

Responsible Gambling Charter

David Lucas, Vice Chair, Institute of Licensing, April 2025

The Institute of Licensing (IoL) is the professional body for licensing practitioners across the UK and one of the IoL's areas of concern is the control of premises where regulated gambling takes place. The objectives of the IoL are for the benefit of the public and are concerned with the application of licensing laws to promote the prevention of crime and disorder and the protection of children and vulnerable people together with wider objectives.

The IoL is committed to partnership working, particularly in relation to the effective and proactive management of licensed premises. The IoL seeks to positively influence conversations and promote partnerships directly and indirectly related to licensing. The Responsible Gambling Charter produced by the Gambling Business Group is entirely consistent with the aims and objectives of the IoL and we are pleased to be able to add our support to its implementation by the Members of the Group.

Matthew Hickey, then CEO, of the Gordon Moody Association, February 2023

We all have our part to play in reducing gambling harm. Research, education, prevention and treatment are all essential in creating a safer environment for those who operate in the sector as well as their customers ensuring that those that need support have access to the right intervention, in the right place, at the right time.

Therefore, we are delighted to see organisations like the Gambling Business Group working proactively to go above and beyond with their approach to Responsible Gambling and the commitment to continuous improvement. We have reviewed the new GBG Responsible Gambling charter and as a result, we are very happy at Gordon Moody to support its contents. Let's tackle gambling addiction together.



Responsible Gambling Charter

Introduction

This document sets out the core principles in the provision of Safer and Responsible Gambling products and services to consumers that all Gambling Business Group (GBG) Members agree to have embedded in their organisational culture. It does not supersede or replace any of the responsible gambling legal requirements set out in the Gambling Act and the <u>Licensing Conditions and Codes of Practice</u>. The Charter builds on those requirements and demonstrates GBG Members' commitment to even higher standards of responsible gambling.

It is therefore important that ALL Gambling Commission licensed Gambling Business Group Members sign up to and commit to this Charter as minimum. GBG Members who are not licensed by the Gambling Commission are expected to commit to the Charter's Principles as appropriate to their organisation. If found in breach of the Charter, the GBG Exec has the right to warn, suspend or terminate the relevant Members' GBG membership.

This document will be reviewed and updated as a minimum every anniversary, but also as and when unforeseen changes necessitate interim reviews, including when gambling legislation is reviewed or new requirements introduced.

Gambling Business Group Ethics and the Protection of the Vulnerable

Responsible Gambling must sit at the heart of the provision of gambling products, gambling services and gambling operations, not least because protecting the vulnerable is one of the three licensing objectives in gambling legislation.

If consumers are to trust operators they need to be confident that operators have robust procedures and practices to prevent customers from being subjected to gambling harm. In the unlikely event that a customer is subjected to gambling harm, customers must trust that operators respond quickly and offer help and information.

Responsible Gambling Principles

1. Responsible Gambling Statement (B2B, B2C and non-licensed Members)

Members who provide consumer facing services (B2C) commit to having a Responsible Gambling policy or statement that:

- a. is publicly available and accessible, and
- b. describes the organisation's approach to Responsible Gambling for any current or potential stakeholders and
- c. explains the organisation's compliance with the Licensing Objectives and LCCP and
- d. ensures that marketing and advertising strategies support informed choices by customers in line with responsible and safer gambling and
- e. describes the organisation's approach to preventing money laundering and terrorist financing and
- f. sets out the organisation's complaints and escalation processes and
- g. conforms with the contents of this Responsible Gambling Charter and
- h. conforms with any relevant Safer Gambling and Responsible Gambling industry standards and guidelines introduced and ratified by the GBG Members including (but not limited to);
 - The appropriate operation of automated cash dispensers and the respective merchant codes (Industry Code of Conduct for the Use of ATMs and ATRs in licensed gambling premises)
 - ii. Prevention of under 18-year-olds from playing (complex) Category D
 gaming machines with an all cash pay-out, regardless of premises type.

B2B Members and non-licensed Members will, as a minimum, signpost sources of support such as GamCare's National Helpline.

2. Nominated Responsible Gambling Point of Contact (B2C Members)

B2C Members commit to nominating a team, a senior manager(s) or a board member(s) as their Responsible Gambling Governance Point of Contact(s) and ensuring that the rest of the organisation is aware of the process to raise issues with them. This role will not mitigate the accountability of the Board of Directors for Responsible Gambling and Social Responsibility.

3. Responsible Gambling Staff Training (B2B, B2C and non-licensed Members)

The requirements for training on all of the respective responsible gambling elements of the Licence Conditions and Codes of Practice (LCCP) are the minimum that GBG B2C Members use in their businesses.

B2C Members are committed to ensuring that customer facing employees are trained in:

- o the identification of gambling related harm and associated behaviours
- conducting and carrying out effective interactions and identifying when further intervention is required
- o accurately recording interactions and process self-exclusions.

B2B Members to undertake training as appropriate and *non licensed Members* are encouraged to have a good understanding of responsible gambling.

All Members commit to regular review and enhancement of training as appropriate.

4. **Consumer support** (B2C Members)

B2C GBG Members commit to continuously reviewing and improving their available player/customer information and education services. It is already a legal requirement for operators to display the odds of winning and information about game mechanics or specifications, but these GBG Members commit to going further such as the following:

- i. Time and financial limits
- ii. Time outs and reality checks
- iii. Account history, where technically feasible

5. **Employees & Gambling Harm** (B2B, B2C and non-licensed Members)

All GBG Members commit to having a clear corporate policy on how to deal with an employee should they develop or portray harmful gambling behaviours. Measures should also be in place that:

- a. are designed to protect employees from gambling related harm and
- b. facilitates appropriate and necessary support and actions from colleagues and line management.

6. Stakeholder engagement (B2B & B2C Members)

GBG B2B and B2C Members commit to having processes in place to enable all stakeholders to be consulted with, in relation to the identification of improvements to best practices for Responsible Gambling. These stakeholder groups could include:

- a. Employees
- b. Consumers/customers
- c. The Research, Education and Treatment sectors
- d. Similar product/service providers
- e. Government
- f. Regulators

7. Innovation and development (B2B & B2C Members)

B2B & B2C GBG Members commit to adopting a Responsible Gambling ethos from the ground up when innovating, designing and creating new products and services. The characteristic of this ethos is identified in part below.

- a. Consumer protection measures. GBG Members will help and support with the pursuit of better consumer/player protections through innovation and the development of new products.
- b. Problematic consumption identification. GBG Members want their customers to stay in control and continue to enjoy their gambling activity. Through innovation, evaluation and collaboration with industry colleagues, there will be focus on finding effective ways to identify behaviours that indicate gambling related harm and enable early intervention.
- c. Where appropriate, new products and service will undergo a controlled test/trial in a safe environment to facilitate a full evaluation of the players experience and ensure any unforeseen impacts are identified and addressed quickly.

- d. Game design. When designing new games, a balance will be struck between the creation of an attractive and popular game that consumers can enjoy, without unnecessary compulsive behavioural triggers.
- e. Games risk assessment. Processes will be in place to ensure that all new products and games are subjected to a risk analysis to reveal potential harming effects and any other unintended consequences.

8. Corporate Social Responsibility (B2C Members)

As part of the GBG's aim of demonstrating how high street premises can contribute to the wellbeing of communities and society, *B2C GBG Members* will commit to continually reviewing and promoting their broader Corporate Social Responsibility activities, as appropriate to their business. Depending on the nature of their business this could include:

- Signposting Citizens Advice/ Age UK support services
- Having a safeguarding policy and/or a nominated children's safeguarding champion
- Operating <u>Ask for Angela</u> (or similar initiatives)
- Participating in local BIDs/Purple Flags schemes
- Being a member of local Betwatch/Pubwatch schemes
- Operating as a safe haven
- Signing up to late night Charters where they exist, for example
 - London Women's Night Safety Charter (resources and how to sign up)
 - West Midlands Women's Night Safety Charter (info and how to sign up)
- Getting involved in other local relevant initiatives

GBG Responsible Gambling Charter Version Control

August 2022	V1
September 2022	V2
November 2022	V3
December 2022	V4
January 2023	V5
January 2024	V6
February 2024	V7
March 2024	V8
July 2025	V9