



PLAYING SAFE

THREE YEARS ON



Innovating
Responsible
Gambling

EXECUTIVE SUMMARY

Playing Safe, now in its fourth year, was established to provide the UK casino industry with a robust, socially responsible framework within which all businesses are expected to operate. It has created an enhanced responsible gambling programme to which all members of the NCF are required to sign up as a condition of membership.

Playing Safe's principles define the way the UK casino industry conducts its business. This code of best practice is the flagship industry-led responsible gambling programme in the UK and the Playing Safe Accreditation, Certification and Evaluation (ACE) Panel has developed a methodology for evaluating company practices against it.

To date, the four largest casino companies (which currently operate more than 70% of all UK casinos) have been evaluated, and all have been judged compliant with the code. The evaluations revealed examples of best practice which are in the process of being shared across the sector, and they also identified issues which are shaping the next strands of Playing Safe's work.

This brochure gives a flavour of some of the areas Playing Safe is currently focusing on, as well as an insight into the broader way in which the industry as a whole is responding to social responsibility obligations.

But it also seeks to celebrate the value casinos bring to communities, offering career opportunities to 16,300 employees from croupiers and pit bosses to senior managers, and thousands more such as chefs, waiters, and waitresses, all of whom aspire to the highest standards. Casinos are an important element of the UK's broad entertainment and leisure mix and they need to grow and evolve if they are to survive. It is important to strike a balance between giving our customers the products and experiences they want - and which they can find in other jurisdictions around the world - and the need to protect the vulnerable.

Together with the Gambling Commission, the Department for Culture, Media and Sport, and our affiliated charities and trusts, we believe we are setting sector-wide standards. 2017 will see Playing Safe continue to deliver best practice protocols for all our members.

Tracy Damestani

Chief Executive, National Casino Forum

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THE PLAYING SAFE EXECUTIVES

Professor Yvonne Guerrier

Yvonne Guerrier has been Social Responsibility Advisor to Playing Safe for the last three years. She is currently working on several projects, including the evaluation of SENSE and the messaging initiatives, and also provides advice for consultations and on research which may be relevant to the casino sector. Yvonne is chair of the ACE (Accreditation, Certification and Evaluation) Panel. Before joining Playing Safe, Yvonne was Professor of Organisation Studies and Dean of the School of Business and Social Sciences at the University of Roehampton. She has wide experience as a researcher and expert in the leisure industry, particularly hospitality and tourism. She is a visiting professor at West London University.

Dr Guy Bohane

Guy Bohane has been lead-researcher on academic studies into gambling, including an Alcohol Concern project exploring the relationship between alcohol and gambling behaviours, conducted in collaboration with the Royal College of Psychiatrists in Wales. He also led two studies on the social impact of casino gambling in the UK. Guy, who has a PhD in Business Ethics and a Masters in Education, teaches corporate social responsibility and ethics at the University of Roehampton Business School. A member of the ACE accreditation panel, he is also involved in ongoing evaluation of the SENSE scheme, the Young People and Casinos project, and the development of training resources to support vulnerable customers.

Tom Kavanagh CBE

Tom Kavanagh CBE is a member of the Playing Safe Accreditation, Certification and Evaluation (ACE) Panel. He chairs the National Casino Forum working group which is preparing good-practice guidelines on the prevention of money laundering and terrorist financing in the land-based casino industry. Tom is also controller of the Independent Panel for Casino Arbitration, which provides alternative dispute resolution procedures. As former Secretary of the Gaming Board for Great Britain for 14 years and Deputy Chief Executive at the Gambling Commission until 2010, Tom has a solid background in gambling regulation.

Dr Christeen George

Dr Christeen George is a Chartered Occupational Psychologist with a special interest in the psychological contract: the unwritten set of expectations in the employer-employee relationship. She has managed and delivered research

projects in many large organisations and has also worked extensively with the leisure sector. Christeen designed and analysed the on-line surveys for the SENSE evaluation and continues to be involved in this work. She will also

work, with other members of the Playing Safe Executive, on the project around younger people and messaging, in the development of the training module for supporting vulnerable customers, and with casino staff on engaging with the responsible gambling agenda.



SEVEN CORE ELEMENTS

- 1 Responsible Gambling Culture and Governance
- 2 Protecting Children and Young People
- 3 Protecting the Vulnerable
- 4 Advice and Information for Customers
- 5 Customer Interactions
- 6 Marketing and Advertising
- 7 Training and Development

The seven core elements of the Playing Safe principles are embedded into the responsible gambling policies of all NCF member companies. Companies are encouraged to test the robustness of their responsible gambling policies in accordance with the Accreditation Certification and Evaluation (ACE) programme.



ACCREDITATION, CERTIFICATION AND EVALUATION (ACE)

The ACE panel - an independent body of experts, comprising Professor Yvonne Guerrier, Dr Guy Bohane and Tom Kavanagh - is tasked by NCF with evaluating land-based casinos' responsible gambling policies and practices against the seven core elements of the Playing Safe principles.

The largest casino operators have been successfully evaluated and awarded ACE certification and evaluations of the smaller and independent operators are underway.

While several examples of good practice have been identified from the reviews, we have also noted some areas which all companies find challenging and these form the basis of new projects and interventions. There are also some areas where we need to change or add to the Playing Safe principles to ensure they remain pertinent.

Responsible Gambling Culture and Governance

Companies are assessed on the way in which they embed responsible gambling practices across the organisation and the mechanisms they have to monitor trends in problem gambling.

There were several examples of good practice across all companies.

The ACE panel commended

Protecting Children and Young People

All the casino companies stressed their consistent message of zero tolerance for under-18s entering casinos and the constant vigilance of staff, particularly on the reception desk.

Managements make the prevention of underage gambling an absolute priority and are acutely aware of it when planning security and staff training, especially in relation to Challenge 21/25 ▶



procedures. There are comprehensive procedures in place to ensure that under-18s do not gain access to casinos and staff do not hesitate to request valid ID.

Protecting the Vulnerable

The SENSE voluntary self-exclusion scheme is now effectively embedded in all casinos and included in all responsible gambling training.

Talking to staff at all levels in different casinos, the ACE panel found a high level of awareness of SENSE and the process for making managers aware of concerns about individual gamblers, especially when dealing with potentially problematic guests. Genting has in place quality management systems to ensure that vulnerable people are not encouraged to re-stake their winnings, chase losses, or continue to play when they have indicated that they wish to stop. ▶



Advice and Information for Customers

All the companies correctly displayed the appropriate leaflets and stickers, but the ACE team questions whether this is necessarily the best way to communicate responsible gambling messages. Playing Safe has now initiated some projects on messaging (See What's Next for Playing Safe on page 16). Panel members were impressed by the way Aspers displays responsible gambling messages on screens and by Caesars' experiments with engaging interactive screens.

Marketing and Advertising

Compliant and robust systems are in place for marketing and advertising. However, greater focus will be put on language and style of marketing literature in future.

Training and Development

All the companies reviewed so far have robust systems for training new staff and updating staff on responsible gambling. Much of this is now delivered online and companies have invested considerable time and resources into the development of modules. One downside of online training is that material can be difficult and expensive to update or change. Playing Safe is working to develop a

learning module on identifying and protecting vulnerable customers (See What's Next for Playing Safe on page 16), in part to test a more flexible approach to online training.

The Criteria

While the current round of ACE evaluations will be conducted with the initial criteria, this year the panel will be reviewing the criteria and process. For example, the section on Protecting the Vulnerable will be expanded so it is not just focused on self-exclusion. Other issues that are not explicitly addressed in the current criteria include recognising problems with VIP customers, gambling with the proceeds of crime (where crime is a consequence of problem gambling), and systems for identifying people at risk, for example those with mental health issues.

We also intend to incorporate general business ethics in the section on Governance to assess how casino companies ensure high ethical standards are maintained and integrity risks are managed. The revised criteria and process will be firmly focused on operators' capacity to reflect on, evaluate, and learn from their practices, not just on their compliance with regulations.



SENSE IN ACTION

Evaluating how the SENSE scheme has been implemented by casino operators

More than 6,000 customers have been enrolled on to the Self-Enrolment National Self-Exclusion (SENSE) scheme since its launch in August 2015, and the Playing Safe executive has now completed the first stage of its on-going evaluation: to investigate how SENSE has been implemented by the operators.

Feedback shows that SENSE has been enthusiastically received in casinos and is generally working well, although some areas require more work:

- Making sure managers understand the full functionality of the system: for example, its translation capabilities
- The most appropriate ways to provide customers with information about self-exclusion and the sources of help and support available while they are excluded
- Ensuring managers are properly trained to conduct SENSE interviews, particularly when removing customers from the scheme

The findings are drawn from 11 interviews with senior CSR/compliance directors and an on-line questionnaire sent to Personal Management License Holders (PMLs), who are responsible for signing people up to SENSE and cancelling their enrolment on the scheme. Of the 337 respondents, 88% had signed up at least one person to SENSE.

The CSR/compliance directors said staff had responded enthusiastically to the new scheme and found the new tablet-based system easier to implement than the old paper-based systems.

The questionnaire asked respondents about the last customer they had signed up to SENSE. In most cases they reported that the customer had initiated the discussion, although about half the managers reported that the customer was known to them and we do not know if any discussions had taken place beforehand. Three-quarters of respondents said ▶



the customer had come to them immediately after a gambling session and there were some comments about the difficulty of processing enrolment when someone was distressed and anxious to leave as quickly as possible.

Self-exclusion breaches and attempted breaches - when someone is stopped before they enter the casino floor - are relatively common, with 2,600 identified to date. Just under half the managers questioned reported that they have had to deal with breaches or attempted breaches. While we do not know how many excluded customers have slipped through without being identified, the number of recorded breaches and attempted breaches is a positive sign that the system is robust. Three-quarters of respondents said the SENSE photo gallery was useful or very useful in identifying self-excluded customers, with most operators also using their own databases to help with identification.

To date 1500 customers have asked to be removed from the SENSE database. Inevitably fewer managers have experience of removal compared with signing up, with only half the respondents saying they had conducted at least one interview to remove a customer from the scheme. The proportion of managers - 54% - who said they felt prepared or well-prepared for cancelling a SENSE enrolment suggests that operators need to pay more attention to equipping managers to conduct these interviews, which are arguably trickier than registering a customer on to the system.

Although the system is voluntary and customers must be removed if they ask to be, it is the policy of all operators to interview returning customers - even if they have been taken off the scheme by another operator - and to bar them if there is any doubt about whether they are ready to return to gambling.

Customer Surveys

The Playing Safe team is also collecting data from customers who have been registered on SENSE and have now cancelled their enrolment. The object of these questionnaires and follow-

up interviews is to better understand customers' experience of SENSE and being self-excluded. We are keen to learn whether any additional help or advice was sought during self-exclusion and what form that might have taken, and also whether any other gambling activity took place during the SENSE exclusion period.

Response rates are currently too low to report findings but early indications, especially from interviews, again suggest that the focus needs to be on the most appropriate ways of giving customers information about self-exclusion, help, and support, and on making sure managers are well trained to conduct SENSE interviews.





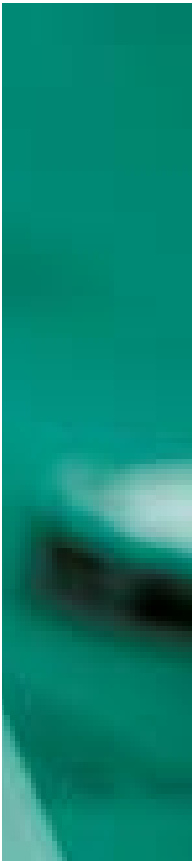
USING PLAYER DATA TO IDENTIFY RISK: THE NEXT PHASE

The National Casino Forum (NCF) continues to take part in a three-phase study on using player data to develop algorithms for identifying high-risk gambling patterns. This international collaborative project is co-funded by the Canadian Government with industry participation from operators in three different countries.

The study is driven by growing demand for gambling operators to comply with regulations requiring the use of risk identification technology to mitigate risk for problem gambling, money laundering, and other high risk gambling behaviour. Equally important is the ability of this technology

to monitor the impact of practices and policies designed to reduce consumer risk and harm.

Focal Research has been developing risk detection models for commercial use since 2005 and these have proven to be effective responsible gambling tools. But building custom algorithms is expensive and technically challenging, so a cost-effective alternative is needed if the industry is to adopt this technology. In consultation with industry, regulators, and public health providers, Focal designed a staged research plan to develop ALeRT: a reliable, flexible, risk identification and mitigation platform. ▶



Phase 2 is now well underway in the UK. It involves developing working algorithms for testing during an eight to 12-month field trial (Phase 3) beginning in July 2017. These algorithms are:

- High-Risk Models for detecting and tracking high-risk gambling patterns for problem gambling among high-spending and lower-spending UK casino customers
- No-Low Risk Model for detecting and tracking low-risk gambling patterns
- Identification and tracking for prevention applications versus harm reduction

Following review of Phase 1 testing in the UK, conducted through NCF's Playing Safe initiative with four large casino operators providing customer access and player data, the research study is now also exploring these questions:

- 1 Can 'gamblers of interest' be identified using machine session data live-on-the-floor to extend risk identification to include customers who gamble without a player card?
- 2 Can a self-updating component extend the

shelf-life of the models without having to conduct customer risk surveys to update them?

- 3 Can standard performance metrics be set to monitor the impact of responsible gambling activity for customer risk and harm?

Five NCF operators are taking part in Phase 2 of the study, with 2,273 player risk surveys collected in September, October, and November last year. Participating operators provided historical loyalty data and, when available, corresponding 'un-carded' or anonymous data sets for comparison. Data transfer was completed in February 2017 and analysis is now underway.

The Phase 2 summary report is expected in June 2017 and a full technical report is due around July 2018 following completion of the trial.





PREVENTING UNDERAGE ENTRY TO CASINOS

NCF members continue to ensure their system for keeping under-18s out of casinos is working properly.

The Challenge 21/25 programme, which operates in every member casino, is tested annually by an independent test purchasing provider.

All casino operators in the country were included in the 2016 assessment which put age verification procedures to the test in 135 casinos nationwide. Only six venues did not challenge the test purchaser for ID and these casinos were placed into the remedial test programme.

Following the remedial tests, all premises achieved a 100% pass rate.



YOUNG PEOPLE AND CASINOS RESEARCH PROJECT

The casino industry is committed to continuously improving the ways in which we identify harmful play in order to protect our customers. With that in mind, we have set up the Young People and Casinos qualitative research project to help us examine the risks of casino gambling for younger people.

We have a responsibility to ensure that children and young people grow up in an environment protected from gambling-related harm. One of the key issues today is the way the rise of social gaming – playing online games on a social media platform – has blurred the lines between gambling and other leisure activities.

Another longstanding concern is the effect of gambling advertising on children and young people. Ofcom reported that there were 1.8 billion commercial gambling ‘impacts’ on four- to 15-year-olds in the UK in 2012 and The Minister for Sport, Tourism and Heritage has made it clear that she will look regularly at the issue of gambling advertising. It is our responsibility to stay on top of emerging technologies and communications platforms, and to ensure that marketing for gambling products does not target young people.

This research project will help us to analyse the behaviour and playing strategies of younger players and assess young peoples’ perceptions and awareness of the risks of casino gambling. Our aim is to find the messages that are most effective in helping younger people to manage their gambling.

The objectives of the research therefore are:

- To consider ways of improving the support and guidance around gambling safely for young customers and casino staff
- To critically analyse customer behaviour and the playing strategies of younger players

Research conducted so far includes

We are also planning a further round of interviews and focus groups with young customers at the Victoria Casino, London.

The research will be published in the form of an interim executive report in 2017.



WHAT'S NEXT FOR PLAYING SAFE

Playing Safe is engaged in a number of exciting projects

SENSE Evaluation

Our work on evaluating the Self-Enrolment National Self-Exclusion (SENSE) scheme is ongoing as we strive to make the system as effective as possible.

We will be conducting focus groups with managers who enrol and remove people from SENSE to see how they can be better trained and supported to operate the system.

We will review the available customer information about SENSE and the signposting around problem-gambling to ensure it is as accessible and user-friendly as possible.

We will prioritise the collection of data from customers who have been registered on SENSE but have now cancelled their enrolment in order to better understand their experience of the process.

Read about the first stage of the evaluation on page 10.

Messaging and Marketing

A qualitative project with young adults has been described on page 15.

We will also be undertaking a similar project with gamblers aged 50-plus, an important but less studied segment of casino customers.

Identifying and Supporting Vulnerable Customers

In October 2016, NCF Playing Safe facilitated a workshop for casino operators run by the Alzheimer's Society.

This raised awareness of a range of cognitive conditions, such as autism and dementia, and explored how they might affect decision-making, potentially increasing the vulnerability of some customers when gambling in casinos. ▶



The workshop focussed on how staff can better recognise customers with cognitive difficulties to engage with them more effectively.

Since only a small number of people were able to attend the workshop, the Playing Safe team now plans to develop an e-learning module for casino managers and staff.

The learning resource will be developed and made available to all NCF members through an open-access virtual learning environment, or delivered through an operator's own virtual learning system.

As well as providing valuable resources, the initiative will offer a foundation for the development of other modules to enhance operators' own training programmes.

Transparency and the Volatility of Slot Games

In 2015, Playing Safe conducted research on Game Chooser, an IGT initiative to make the volatility of different slot games transparent. The results, reported in *Playing Safe: Two Years on (2016)*, concluded that transparency about volatility was desirable as a responsible gambling tool, but that if each operator had its own icons for indicating volatility, players would be unlikely to understand them.

Playing Safe has now been contacted by the developers of SlotGuru, an app to provide slots players with more games information, including details of volatility. We have worked with SlotGuru to ensure that messages about responsible gaming are embedded in the app and we are delighted that the product is now being piloted in Aspers Casinos. We will be evaluating the pilot from the perspective of responsible gambling. ▶



ACE Reviews

We aim to have conducted a first review of all NCF members within the next 18 months.

A review of the Playing Safe criteria against which companies are evaluated is planned for this year. We intend to incorporate more on business ethics - to assess how casino companies ensure they maintain high ethical standards and manage integrity risks - and on anti-money laundering (AML), both in relation to problem gambling.

We also want to make sure the process supports an evidence-based approach in line with the Gambling Commission's Annual Review statement.

Read more about the ACE reviews on page 7.

Phase 2: Using Player Data to Identify Risk (ALeRT)

NCF is participating in Phase 2 of a three phase collaborative international research project with Focal Research using player data to develop reliable algorithms for identifying high-risk gambling patterns among UK casino patrons. Following development of successful preliminary UK casino models for 'proof of concept' in Phase 1, increased sample sizes were gathered in Phase 2 from Sep 1 to Nov 30, 2016 with data transfer completed Feb 2017. Analysis is underway using advanced analytics and data science with the new Focal ALeRT platform prototype to develop custom algorithms for participating casinos during spring 2017. Final models will be ready for field trial, performance monitoring, and usability testing in Phase 3, scheduled to commence July 2017. ▶





Casino Staff – Playing Safe 360 degrees

In order to support customers to gamble responsibly, casino staff must in turn feel supported in their job roles. The emphasis on responsible gambling often puts staff under pressure: for example, they may have to deal with agitated customers wishing to self-exclude at peak periods of the work shift.

Psychological contracts are the unwritten set of expectations between employees and employer: a form of guarantee that if both sides play their part then the relationship will be mutually beneficial.

It has been shown that employees' willingness to go the extra mile for customers is linked to having well-balanced psychological contracts. The Playing Safe Executive therefore plans to assess how well the psychological contracts of casino staff are being fulfilled, by looking at the obligations of both staff and the casinos in which they work.

Working with Other Agencies

We continue to engage with and support other researchers, for example Ridgeway, and other sectors of the gambling industry, through work with the Industry Group for Responsible Gambling (IGRG) and other stakeholders.



National Casino Forum

ASSOCIATION OF BRITISH CASINOS

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