

# IRISH BOOKMAKERS ASSOCIATION

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SAFER GAMBLING CODE

SEPTEMBER 2021

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## **INTRODUCTION**

Gambling is a popular Irish pastime. Whilst the vast majority of people who gamble enjoy betting responsibly and safely, for some it can develop into a problem or addiction.

Subscribers to the Irish Bookmakers Association Social Responsibility Fund(SRF) fully understand concerns regarding those people who may be adversely affected by gambling and, as a responsible business sector, are committed to minimising gambling related harm.

All subscribers are committed to providing a safer and enjoyable leisure experience on the high street and online. This is an evolving process, and we commit to building on current best practice. This code is a culmination of learnings from operators' experiences and various authoritative and credible sources.

The purpose of this paper is to provide a benchmark for Irish Gambling Operators so that they take all reasonable steps to minimise the extent of problem gambling and to prevent underage gambling from taking place.

The Code is broken into two parts: Part 1, Retail Code; Part 2, Online Code.

## **RESEARCH, EDUCATION AND TREATMENT**

All subscribers will make a voluntary contribution to the SRF, and as a requirement of subscription, strive to minimise gambling-related harm. Key to this is effective education and prevention techniques, designed to prevent people getting to a stage where they have a problem with their gambling.

This SRF fund will be given to The Gambling Awareness Trust (GAT). GAT is an independent charity that has been set up to establish and operate a charitable fund which will fund problem gambling counselling, prevention, education, research, and awareness services in Ireland. The GAT goals include;

- Ensuring approved, relevant and competent service providers have funding to provide addiction counselling, education and gambling awareness services in Ireland.
- Commission and supervise comprehensive research in the area of gambling addiction for retail and online, and the gambling addiction services available in Ireland.
- Ensure GAT operates to the highest Governance standards.
- Raise awareness of Safer gambling and ensure people who choose to gamble make informed and sensible choices.
- Raise awareness and increase the availability of problem gambling service providers.

All Subscribers will also:

- Co-operate with any Government led Irish Gambling Prevalence Study to understand how many people in Ireland have a problem with their gambling
- Ensure that gambling information indicating where help can be obtained is displayed prominently on all premises and all online gambling platforms
- Promote Safer Gambling campaigns.

## **SAFER GAMBLING INFORMATION**

Operators that contribute to SRF, will be listed on the [www.GamblingAwarenessTrust.ie](http://www.GamblingAwarenessTrust.ie) website which is owned and administered by The Gambling Awareness Trust (GAT). GAT is committed to providing a hub of safer gambling information for customers and industry members alike, through a dedicated website at [www.gamblingcare.ie](http://www.gamblingcare.ie). The site will also provide details on services provided by experts in the field of addiction in Ireland.

## **CONTACT POINTS**

Any person wishing to comment on this code or report incidents of non-compliance with its provisions should in the first instance, contact: [Info@IrishBookmakersAssociation.com](mailto:Info@IrishBookmakersAssociation.com)

## **LEGAL DISCLAIMERS**

Whilst this code is designed to improve informed choice and self-help strategies for customers, it should not be construed as creating a legal duty of care on the part of operators for problem gamblers or customers at risk of becoming problem gamblers. Nothing in this Code shall be taken to override data protection law or the obligations of operators and their employees under health and safety legislation.

## **PART 1: RETAIL CODE OF PRACTICE**

### **1. CUSTOMER BEHAVIOUR AND SAFER GAMBLING INTERACTIONS**

Customer behaviour will assist in identifying any persons that may have a problem or be developing a problem with their gambling. This is an immediate and direct way of getting to provide simple and effective information to the person displaying such signs, including:

- 1.1 Ability to identify customers that may be displaying signs of problem gambling.
- 1.2 Knowing when to provide relevant literature and information to customers.
- 1.3 Listening to concerns from family members or connected persons.
- 1.4 Referring a customer with suspected problem gambling concerns to the shop manager.
- 1.5 Informing management and documenting incidents in social responsibility journals/diaries (hard or soft copy acceptable) which include an overview of the action taken and the date and time of the incident.

### **2. EFFECTIVE USE OF DATA**

Operators are committed to making effective use of management reports and the validated customer data available to them, to develop procedures that are designed to identify signs associated with problem gambling and the most appropriate time to provide customers with information that relates to the level of risk associated with their gambling.

This would include measures that are flexible enough to take into account any new information provided through problem gambling research findings or deal with any future regulatory change or change to their business.

### **3. AGE VERIFICATION**

The industry takes its responsibility to protect children and young people very seriously;

- 3.1 Operators are committed to working under the 'Think 21' principle. This is a process where any customer that looks younger than 21 is asked for ID. If they are under 18, they are asked to leave.
- 3.2 Operators commit to conducting regular third-party age verification testing to check the implementation of the Think21 policy in shops.
- 3.3 Shops commit to display Age limit signs, and/or use the Garda ID card on their windows.
- 3.4 Apply Age verification procedures in shop.
- 3.5 Members will track and log any Think21 challenges and incidents.
- 3.6 Operators commit to having no Under 18's on the premises.

## 4. SELF-EXCLUSION

Operators are committed to offering an effective self-exclusion process, and recognise it is an important step for individuals who are not in control of their gambling in addressing their behaviour. The most effective system of self-exclusion is a localised one where the self-excluded person excludes from shops where the customer has been a regular attendee and is known to staff.

When a customer requests a self-exclusion form, it should be facilitated with immediate effect for that shop by any member of staff discreetly. Operators are committed to the following:

- 4.1 All operators will maintain a self-exclusion register, monitor the number of self-exclusions in each of their shops and have processes to make sure that shop staff are properly implementing self-exclusion and requesting photos with each.
- 4.2 Internal options for exclusion from the operator's other channels and removal from marketing databases.
- 4.3 Enforce a minimum period for self-exclusion of 6 months.
- 4.4 Provide a 'return to betting form', for customers to sign and confirm their intention to resume business relationship after their Self-exclusion period has ended.

## 5. SAFER GAMBLING INFORMATION

Display prominently the following information in every shop:

- 5.1 How to gamble responsibly.
- 5.2 Support services.
- 5.3 How to self-exclude.
- 5.4 'Think 21' signage.
- 5.5 Members commit to carrying out 'mystery shopper' audits in line with an IBA recommended approach.

## 6. ADVERTISING

Advertising and promotions will not target children (or sectors which are directly connected with children) or leave vulnerable people open to exploitation and harm.

From September 1<sup>st</sup>, 2021, Operators commit to:

- 6.1 Promoting safer gambling messages in shops.
- 6.2 Dedicate 20% of shop window posters to safer gambling messages.
- 6.3 Ensure safer gambling messages on all TV end frames, press advertising and outdoor adverts is prominent and in proportion.

- 6.4 Carrying out 'mystery shopper' audits in line with a IBA recommended approach
- 6.5 Promote safer gambling messages on own web and social applications as appropriate.
- 6.6 Ensure safer advertising, sponsorship and promotional activities comply with ASAI standards or any other relevant standards or regulations.
- 6.7 Ensure 18+ or relevant symbol is included on all posters and adverts.
- 6.8 Include Socially safer messaging and ensuring GamblingCare.ie or another similar service provider, appears on all adverts across all platforms, including on adverts on screens inside shop.
- 6.9 Gambling adverts must not be shown on TV before 9pm. This includes the sponsorship of television entertainment programmes but does not include televised sporting events. However, no pre-watershed television betting advertising will be permitted during the period from 5 minutes before a live event begins until five minutes after it concludes ('Whistle-to-Whistle'). This includes breaks in play, for example, the half time period in a football match.
- 6.10 Because of their inherent links with betting, which is not the case with all sports, the Whistle-to-whistle restrictions do not apply to horse or greyhound racing.
- 6.11 For the avoidance of doubt, where live sports events begin before the 9pm watershed, but continue after that time, then these restrictions apply solely to that part of the broadcast that occurs before 9pm. In relation to time shift channels, that carry a time-delayed rebroadcast of their 'parent' channel programming, these restrictions will not apply if the + broadcast is shown after 9pm.
- 6.12 For multiday sporting events, such as Golf tournaments or Test Matches in Cricket, the five-minute period will begin at the start of each day's activity (i.e. in these examples there should be no advertising from five minutes before the first Tee off or first ball is bowled).

It is important to note that the primary responsibility for the regulation of advertising by gambling operators in Ireland is shared between the [Advertising Standards Authority for Ireland \(ASAI\)](#) and the [Broadcasting Authority of Ireland \(BAI\)](#). This code is designed to supplement and support those rules by providing industry standards in related areas, especially around messaging, that are not covered by the ASAI/BAI rules.

For the avoidance of doubt, where advertising content originates in the UK and that transmission is accessible from Ireland, the relevant UK advertising codes apply.

## 7. STAFF TRAINING

- 7.1 All staff will be trained, in consultation with providers of safer gambling expertise, to recognise a wider range of problem gambling indicators and will aim to identify those customers at risk of developing a gambling problem.
- 7.2 All shop staff will be trained in how to interact with customers around potential gambling problems, including discretely providing literature and contact details for relevant advice centres.
- 7.3 All operators will have an escalation process should the staff member be unable to assist the customer adequately or feel they need more support.
- 7.4 Staff will be trained when joining the company and refresher courses will be provided to all staff at least annually.

- 7.5 All staff will be trained to ensure self-exclusion facilities are available and assist customer in filling out same or answer any questions customer may have on the self-exclusion form or process.
- 7.6 Staff training to include details on how to approach customers regarding age verification.

## **8. SHOP AND STAFF SAFETY**

The level of security within betting shops is very high. Most betting shops are modestly sized, and surveillance from the counter is good. Most also have CCTV provision, and panic buttons. Some have direct links to centralised, rapid response and security facilities. Shop features such as security screens, safe havens, time lock safes, etc. have significantly reduced the incidence of robbery. Retail shops are therefore safe retail environments that neither welcome nor attract a criminal and/or disorderly element.

Shop staff should at all times ensure that they keep themselves safe if dealing with an irate customer. Staff safety procedures are outlined in company training manuals, and all staff should be fully familiar with these.

## **9. CREDIT CARD USE**

- 9.1 Operators must not accept payment for gambling on their premises directly by credit card.

## **10 HIGH VALUE VIP GUIDANCE**

High Value programmes should never be used to exploit vulnerable customers or to encourage problematic behaviour. The measures outlined below should apply to those customers who are identified as warranting enhanced customer service, unavailable to the wider customer base.

Specifically, customer programmes that offer tailored or personalised incentives which may include but is not restricted to:

- 10.1 Invitation to hospitality, events, dinners, or other enhanced services
- 10.2 Personal account management/dedicated point of contact with the operator
- 10.3 Individualised bonuses, benefits, or gifts

In relation to High Value programmes, Operators must be able to demonstrate how they have assured themselves that:

- 10.4 Incentivisation methods do not encourage risky behaviours such as chasing losses, excessive time or money spent gambling, or accelerating frequency of gambling.
- 10.5 The timing of incentives is not linked to periods of excessive play or significant losses, in proportion to the customer's affordability of spend.
- 10.6 Information held on individual customers' habits and preferences is being used to inform safer incentivisation.
- 10.7 Incentives are subject to a customer's affordability and vulnerability assessment by the operator and proportionate to the customers spending pattern.
- 10.8 Tiered or structured incentive schemes are not promoted to customers in a manner which results in individuals gambling excessively to obtain (or retain) a grade or status of VIP which is unsustainable.

Before any operator invites a customer to a high value programme, it must:

- 10.9 Assess whether there is evidence of gambling related harm, or heightened risk linked to vulnerability.
- 10.10 Ensure the licensee has up to date evidence relating to identity, proof of address & occupation.
- 10.11 Continue to monitor the customer activity and spend, performing ongoing gambling harm checks on each customer to try spot any signs of harm.
- 10.12 Operator must appoint a senior executive to oversee the High Value programme.
- 10.13 Operator should take reasonable steps to check whether a customer has previously self-excluded. Where an individual has previously self-excluded, this should be a significant factor in assessing a customers' eligibility for the programme.
- 10.14 Operator to ensure High Value team members have received enhanced training on Safer gambling and AML Risks.
- 10.16 Staff should not be incentivised or remunerated based on a customer's loss, spend, or activity.
- 10.17 Staff are empowered to escalate regulatory concerns relating to High Value customers to managers.

This code is not intended to capture ad hoc, non-personalised bonus offers or promotions that are made available to large numbers of consumers. High value prizes linked to promotions such as customer free prize draws are also not considered in scope where they are made available to the wider consumer base.

## **11. TEAM SPONSORSHIP**

The advertising of adult-only gambling content should never be targeted at teams of u18's or vulnerable people.

- 11.1 Operators will not sponsor any Minor sporting teams.

- 11.2 Operators will not allow their logo or name to appear on the shirts or merchandise of any Minor team.
- 11.3 Operators will not allow their logo or name to appear on any commercial merchandising which is designed for use by children.
- 11.4 Operators will ensure Team Sponsorship messaging includes safer gambling messaging where possible.

## **PART 2: ONLINE CODE OF PRACTICE**

### **12 PROTECTING U18's**

Operators take their responsibility to protect children and young people very seriously. It is the intention of this code to ensure that operators are protecting children, young persons, and other vulnerable persons from being harmed or exploited by gambling.

Operators are committed to age verifying customers to ensure that they meet the legal gambling age of 18.

Operators will:

- 12.1 Make prominent the '18+' sign on web and mobile sites and provide a link to a section of their site detailing age verification controls and policy.
- 12.2 Provide information on the account registration page that underage gambling is not allowed.
- 12.3 Attempt to verify all customers electronically at registration using all available data and as soon as is practical thereafter, for those that cannot be verified electronically.
- 12.4 Prevent Withdrawals from accounts that are yet to be age verified.
- 12.5 Advise that gamblers verified as being underage will have deposits to their account returned to them and will not receive winnings.
- 12.6 Advise that underage gambling should not occur even in the company of adults.

Messages and Content across all platforms and media types will;

- 12.7 Clearly display the 18+ sign or equivalent logo.
- 12.8 Not make claims that gambling represents the transition from adolescence to adulthood, or that gambling can make persons appear more mature.
- 12.9 Not invite or entice U18's to gamble.
- 12.10 Not include Celebrities from movies, programs, or events where the main audience is U18's.

- 12.11 Not display adverts on audio or video platforms where U18's are expected to be the primary audience, including TV ad breaks immediately before or after dedicated broadcasts for U18's.
- 12.12 Not advertise in Print media which specifically targets U18's, e.g. Comic Books, Magazines.
- 12.13 Not include images or photos of U18's in gambling adverts.
- 12.14 Not include images or videos of Adults behaving like or imitating U18's.
- 12.15 Not portray Adolescent, juvenile, anti-social or criminal behaviour.
- 12.16 Not appear on jerseys or merchandise intended for use by U18's, such as clothing, sports gear or equipment.

### 13 SELF-EXCLUSION

Operators are committed to effective self-exclusion and recognise it is an important step for individuals who are not in control of their gambling and may need help in addressing their behaviour. Operators are committed to:

- 13.1 Offering a number of different self-exclusion time periods to customers that are not less than 6 months and minimum can be longer at discretion of operators.
- 13.2 Having an agreed process for players returning at the end of the self-exclusion period, in particular at the expiry of the self-exclusion the customer account is only reactivated at the request of the player and after a cooling off period of at least 24 hours. There is no automatic re-activation of accounts.
- 13.3 Take all reasonable steps to ensure that customers are not directly marketed to during a period of self-exclusion.
- 13.4 Assist any Government department in the establishment and implementation of a national multi operator self-exclusion scheme.

### 14 CUSTOMER LED CONTROLS

In addition to providing self-exclusion facilities described above, Operators are committed to offering other customer led controls that encourage all customers to play within their limits. These could include:

- 14.1 Enabling customers to set **Deposit Limits**. Deposit limits allow customers to place a limit on how much they can deposit in a defined period. They can only be increased after an appropriate cooling off period is observed, while decreases are immediate. The duration of the limit periods on offer should include:
  - one day
  - one week; and
  - one month.

- 14.2 Enabling customers to take a **Time-out** from gambling. The time out periods should include at a minimum:
- one day
  - one week; and
  - one month.
- 14.2 **Reality Checks** should inform the customer when a preselected period of time has elapsed during their session.

## 15 ADVERTISING

Advertising and promotions will not target children (or sectors which are directly connected with children) or leave vulnerable people open to exploitation and harm;

- 15.1 Ensuring safer advertising, sponsorship and promotional activities which comply with ASAI and Broadcasting Authority of Ireland standards;
- 15.2 Having socially safer gambling messages on all television adverts, preferably displaying [www.GamblingCare.ie](http://www.GamblingCare.ie) or another similar service provider.
- 15.3 The inclusion of clear 18+ or 'no under 18s' messaging on all print and television adverts.
- 15.4 Operators should have on their corporate webpages (i) safer gambling messaging and (ii) links through to sources of more detailed information.
- 15.5 Ensure safer gambling messages on all TV end frames, press advertising and outdoor adverts is prominent and in proportion.
- 15.6 Promote safer gambling messages on own web and social applications as appropriate.
- 15.7 Gambling adverts must not be shown on TV before 9pm. This includes the sponsorship of television entertainment programmes but does not include televised sporting events. However, no pre-watershed television betting advertising will be permitted during the period from 5 minutes before a live event begins until five minutes after it concludes ('Whistle to Whistle'). This includes breaks in play, for example, the half time period in a football match.
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providing industry standards in related areas, especially around messaging, that are not covered by the ASAI/BAI rules.

For the avoidance of doubt, where advertising content originates in the UK and that transmission is accessible from Ireland, the relevant UK advertising codes apply.

## 16 MARKETING CONTENT

Marketing communications should not:

- 16.1 Portray, condone, or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.
- 16.2 Suggest that gambling can provide an escape from personal, professional, or educational problems such as loneliness or depression.
- 16.3 State or suggest that gambling may be a way to solve financial or personal issues or represent it as an alternative source of income or substitution for working.
- 16.4 Claim that gambling is free of the risks of financial losses.
- 16.5 Portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments.
- 16.6 Suggest that gambling can enhance personal qualities including for example, that it might improve self-image or self-esteem, or is a way to gain control, superiority, recognition, or admiration.
- 16.7 Promote gambling as an alternative to employment or a financial investment or a solution to financial problems.
- 16.8 Suggest peer pressure to gamble or disparage abstention from gambling.
- 16.9 Link gambling to seduction, sexual success, or enhanced attractiveness.
- 16.10 Portray gambling in a context of toughness or link it to resilience or recklessness.
- 16.11 Suggest gambling is a rite of passage.
- 16.12 Suggest that solitary gambling is preferable to social gambling.
- 16.13 State or imply a promise of winning or portray unrealistic outcomes.
- 16.14 Should not state or imply that a player's skill can influence the outcome of a game unless the skill can actually be demonstrated to affect the outcome of the game.
- 16.15 Attract, condone, or encourage criminal or anti-social behaviour.
- 16.16 Exploit any cultural beliefs or traditions in relation to the role of luck and winning in gambling.
- 16.17 Contain any pressuring or urgent messages.

Marketing communications for events or facilities that can be accessed only by entering gambling premises should make that condition clear.

## 17 SOCIAL MEDIA MARKETING

Operators should follow each of the following and ensure that these guidelines are followed by third parties involved or promoting their social media marketing, such as Brand ambassadors, Influencers, Bloggers, Podcasts, Streamers, etc..

- 17.1 All gambling operators should have on their corporate web pages;
  - (i) safer gambling messaging; and
  - (ii) links through to sources of more detailed information.
- 17.2 Account profiles for operators' branded websites on social media will also clearly carry '18+' symbols or a 'no-under 18s' type message as well as a reference to GamblingCare.ie or another similar service provider and a reminder to users not to forward the content to anyone under the age of 18.
- 17.3 Gambling operators carry the required social responsibility and age requirements on consumer-facing marketing content on all of their Social media channels.
- 17.4 Operators should ensure use of Age restriction tools where available (age-gating) for content published on social media platforms.
- 17.5 Sponsored or paid-for social media advertisements must be targeted at consumers aged 18+ where technology permits. This measure adds an additional level of assurance around the age of consumers where operators do not hold any first party data about the consumers targeted.
- 17.6 Operators should use their own Social media channels to publish safer gambling information regularly. The frequency should reflect on the operator's level of activity on such channels.
- 17.7 Operators should provide information on how to limit exposure to gambling advertisement across social media platforms. This information should be easily accessible and sufficiently prominent on Safer gambling information pages for users to see and follow.

## 18 SAFER GAMBLING INFORMATION

All Operators commit to doing the following:

- 18.1 Make information readily available to customers on how to gamble responsibly.
- 18.2 Such information should include:
  - 18.2.1 The measures available to help customers monitor and control their gambling including financial limits or time-outs.
  - 18.2.2 Self-exclusion options.
  - 18.2.3 Information about the availability of further help or advice.
- 18.3 Provide all new accounts with links to safer gambling information.
- 18.4 Include Deposit limits page as part of the Account registration process where technically possible.
- 18.5 Providing regular safer gambling messages on social media.

## 19 SAFER GAMBLING MESSAGING

The specific content of advertisements is the responsibility of the operators who are placing them. Safer gambling messages are widely used as a tool to enable informed choices and encourage appropriate gambling behaviour. Safer gambling messages should appear on sites, adverts, videos, via social media channels and on customer communications. Operators should commit to;

- 19.1 Ensuring GamblingCare.ie or another similar service provider is clearly visible and legible on the image or content.
- 19.2 Messaging is stated clearly and is legible.
- 19.3 Display 18+ or equivalent legal age symbol.
- 19.4 Display 'Terms and Conditions apply' where applicable.
- 19.5 Display Wagering requirements where applicable.
- 19.6 Include a safer gambling message where space permits, such as;
  - 19.6.1 A Great tip – know when to Stop.
  - 19.6.2 Let's talk about Safer Gambling.
  - 19.6.3 Bet with your Head, Not above it.
  - 19.6.4 Winners know when to stop.
  - 19.6.5 Please gamble responsibly.
  - 19.6.6 If it's no longer fun walk away.

This is not a prescriptive list and serves only to indicate the sort of messaging that might be appropriate.

- 19.7 Link to the relevant safer gambling website.
- 19.8 Safer gambling messaging to appear throughout length of television advertisements.
- 19.9 Radio advertising raises slightly different practical issues to television messaging. However, we recommend including a brief safer gambling message described in list above, or a voiceover at the end which will refer listeners to [www.GamblingCare.ie](http://www.GamblingCare.ie) or another similar service provider.

## 20 EFFECTIVE USE OF DATA AND CUSTOMER INTERACTION

All operators are committed to;

- 20.1 Making effective use of customer data available to them to identify customers that may be displaying signs associated with problem gambling.
- 20.2 Identifying the types of behaviour that will be logged/reported to the appropriate level of staff and which may trigger customer interaction at an appropriate moment.
- 20.3 Identifying the appropriate level of management that may initiate customer interaction.
- 20.4 Providing training for relevant customer facing staff so that they know who is designated to deal with problem gambling issues.

## 21 STAFF TRAINING

All relevant staff will be trained;

- 21.1 On their respective responsibilities in relation to interacting with customer that are potentially displaying signs of problem gambling. This will include the escalation process to involve staff that are designated to deal with problem gambling issues.
- 21.2 So that staff are able to effectively administer systems for self-exclusion.
- 21.3 At induction and on refresher courses on safer gambling issues and responsibilities.
- 21.4 So that they can assist customers to use customer led controls.

## 22 CREDIT CARD USE

- 22.1 Operators must not accept payment for gambling directly by credit card.

## 23 HIGH VALUE VIP GUIDANCE

High Value programmes should never be used to exploit vulnerable customers or to encourage problematic behaviour. The measures outlined below should apply to those customers who are identified as warranting enhanced customer service unavailable to the wider customer base. Specifically, schemes that offer tailored or personalised incentives linked to high value spend or frequency of play. Such treatment may include but is not restricted to:

- 23.1 Invitation to hospitality, events, dinners, or other enhanced services
- 23.2 Personal account management/dedicated point of contact with the operator
- 23.3 Individualised bonuses, benefits, or gifts

In relation to Customer VIP schemes, Operators must be able to demonstrate how they have assured themselves that:

- 23.4 Incentivisation methods do not encourage risky behaviours such as chasing losses, excessive time or money spent gambling, or accelerating frequency of gambling.
- 23.5 The timing of incentives is not linked to periods of excessive play or significant losses, in proportion to the customer's affordability of spend.
- 23.6 Information held on individual customers' habits and preferences is being used to inform safer incentivisation.
- 23.7 Incentives are subject to a customer's affordability and vulnerability assessment by the operator and proportionate to the customers spending pattern.

- 23.8 Tiered or structured incentive schemes are not promoted to customers, in a manner which results in individuals gambling excessively to obtain (or retain) a grade or status which is unsustainable.

Before any operator invites a customer to a high value programme, it must:

- 23.9 Assess whether there is evidence of gambling related harm, or heightened risk linked to vulnerability.
- 23.10 Ensure the licensee has up to date evidence relating to identity, proof of address & occupation.
- 23.11 Continue to monitor customer activity and spend, conducting ongoing gambling harm checks on each customer to try spot any signs of harm.
- 23.12 Operator must appoint a senior executive to oversee the High Value programme.
- 23.13 Operator should take reasonable steps to check whether a customer has previously self-excluded. Where an individual has previously self-excluded, this should be a significant factor in assessing a customers' eligibility for the programme.
- 23.14 Operator to ensure High Value team members have received enhanced training on Safer gambling and AML Risks.
- 23.15 Staff should not be incentivised or remunerated based on a customer's loss, spend, or activity.
- 23.16 Staff are empowered to escalate regulatory concerns relating to High Value customers to managers.

This code is not intended to capture ad hoc, non-personalised bonus offers or promotions that are made available to large numbers of consumers. High value prizes linked to promotions such as customer free prize draws are also not considered in scope where they are made available to the wider consumer base.

## 24. TEAM SPONSORSHIP

The advertising of adult-only gambling content should never be targeted at u18's or vulnerable people. Operators should ensure that;

- 24.1 Operators will not sponsor any Minor sporting teams.
- 24.2 Operators will not allow their logo or name to appear on the shirts or merchandise of any Minor team.
- 24.3 Operators will not allow their logo or name to appear on any commercial merchandising which is designed for use by children.

Operators will ensure Team Sponsorship messaging includes safer gambling messaging where possible.

## **25. AFFILIATE ACTIVITY**

Operators should ensure that;

- 25.1 Affiliates should be subject to KYC, due diligence and PEPS/sanctions checks.
- 25.2 Affiliates should be provided with a copy of this code and operators expectation of compliance with it.
- 25.3 Affiliates should share safer gambling related content frequently.
- 25.4 Operators should terminate relationships with affiliates who cannot or do not comply with this or any other relevant code.

## **CODE REVIEW**

This code will be updated annually or at any time should regulation, legislation or industry require.

## **CODE MONITORING**

Complaints and breaches of this Industry code are dealt with by The Irish Bookmakers Association.

## **CODE IMPLEMENTATION**

Operators who agree to adopt this code have until 31 December 2021 to address all the necessary technical and contractual issues and apply full implementation of the code.

## **CODE AVAILABILITY**

This Code is available online at [www.IrishBookmakersAssociation.com](http://www.IrishBookmakersAssociation.com)