



# Safer Gambling Standard

2022-23 Insight Report



**Safer  
Gambling  
Standard**



ISO/IEC 17065



## Foreword

In this report, we focus on the Safer Gambling Standard certification scheme, a detailed and rigorous assessment of operators' safer gambling practices.

The Standard assesses operators against a set of requirements developed with the support of an independent and expert review panel, ultimately providing a rating which can be used to benchmark operators and their approach to customer protection.

The Standard is becoming increasingly recognised as an independent benchmark to which operators should aspire. The scheme was recently accredited by The United Kingdom Accreditation Service (UKAS), and from 2024, one major high street bank will decline business from gambling operators who have not achieved the Standard at Level 2 or above.

With the release of the Gambling White Paper, the UK gambling industry and safer gambling particularly has never been more in the spotlight. In this report, you can read more about how we plan to raise standards in this area.

This report covers detail on:

- The 5 Cs that form the pillars of the Standard
- Upcoming changes to the requirements and areas assessed
- How the Standard assessment works
- Key highlights from the Standard, including the number of operators certified and feedback received on the scheme
- Key recommendations and actions to come out of the Standard
- Information on our other services, including training, Helpline Transfers and our Safer Gambling Labs.

We look forward to working with you on raising safer gambling standards over the coming years.

**Dan Whitlam**, Head of Safer Gambling  
GamCare

[SAFERGAMBLINGSTANDARD.ORG.UK](https://safergamblingstandard.org.uk) | [INDUSTRYSERVICES@GAMCARE.ORG.UK](mailto:INDUSTRYSERVICES@GAMCARE.ORG.UK)

## Who is GamCare?

GamCare is the leading provider of information, advice and support for anyone affected by gambling harms in the UK. We operate the National Gambling Helpline, provide structured support for anyone who is harmed by gambling, create awareness about safer gambling and treatment, and encourage an effective approach to safer gambling within the gambling industry.

Part of our mission is to minimise gambling-related harm through education and engagement work such as the Safer Gambling Standard.



## Contents

The 5 Cs of the Safer Gambling Standard	4
Upcoming Changes to the Standard	6
How the Standard Works	7
Highlights	8
Standard Recognised by UKAS	10
NatWest Bank – Expecting Higher Standards from Operators	12
Common Assessment Findings and Recommendations	13
Interview with an SGS Assessor	16
Other Safer Gambling Services	18

# The 5 Cs of the Safer Gambling Standard

In 2022, we adjusted our criteria for how we assess gambling businesses during the Safer Gambling Standard review process. These changes introduced five new pillars of player protection – known as the 5 Cs – which have been brought to the forefront of our evaluations when assessing gambling operators.

## Culture & Governance

This pillar analyses a gambling business's approach to harm prevention, including leadership commitment, governance and its key performance indicators. During the assessment we look closely at how the governance of the business ensures that a culture of harm prevention is embedded within the organisation and that there is a clear strategy in place to mitigate harm.

## Customer Environment

This area assesses how gambling companies create a safe environment for their customers, looking at how an operator approaches issues such as age verification, responsible marketing practices, and safer gambling information and tools, such as limiting play/spend and self-exclusion.

## Customer Management

This pillar analyses how effectively companies identify and manage customers who may be at risk of harm. It centres around practices like risk profiling and customer interaction,

particularly with customers who may be vulnerable. Ensuring effective policies and procedures are in place is important to identify those at risk and take appropriate action.

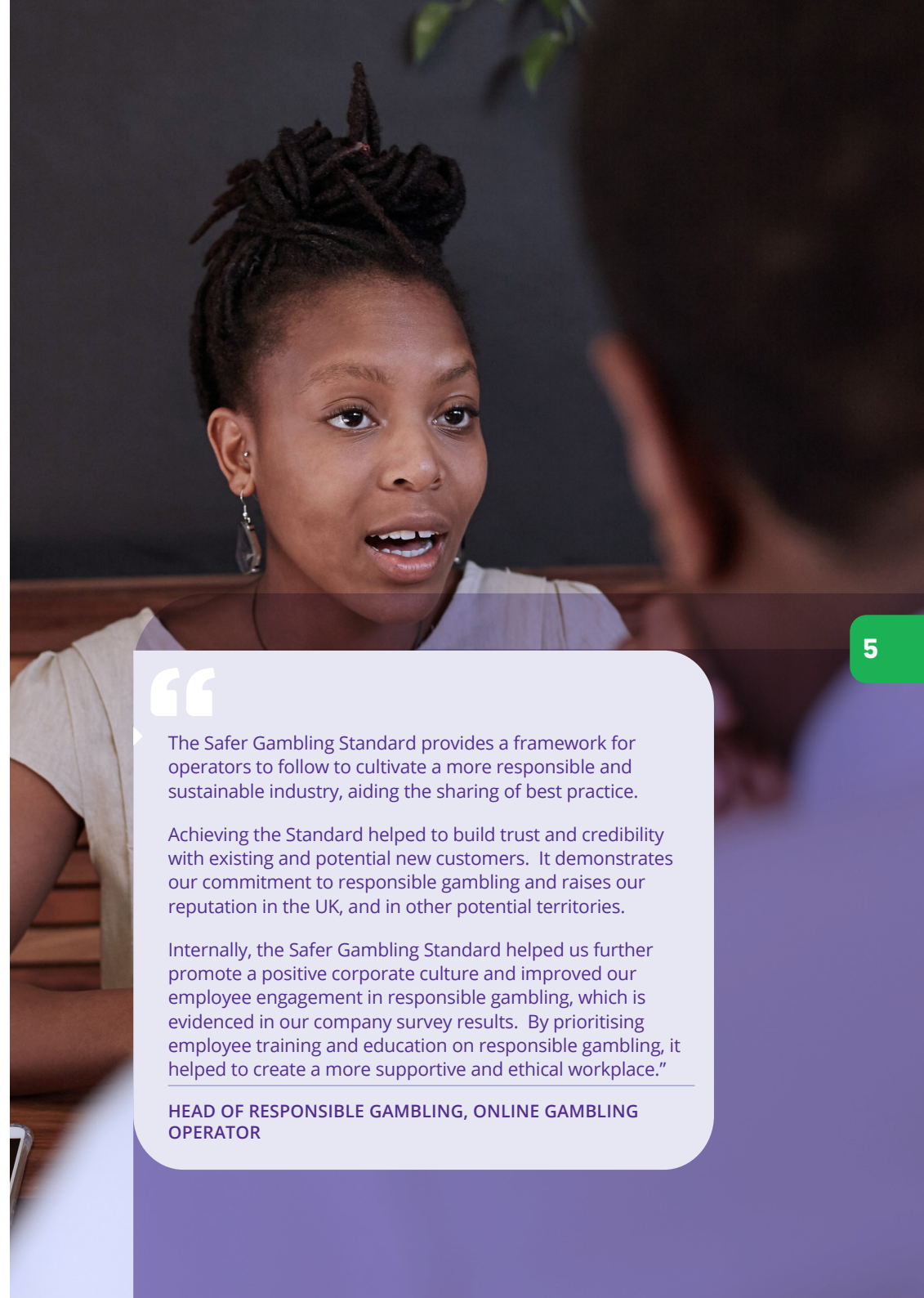
## Colleagues

This area focuses on how companies train and support their staff in promoting safer gambling. It reviews the level of training offered to staff and information and support provided to colleagues to help them understand any customers experiencing harm.

## Collaboration

The final pillar is collaboration. This looks at how businesses collaborate with the wider industry in sharing best practices, particularly on research and education around preventing gambling harms.

Watch our  
Safer Gambling  
Standard video



The Safer Gambling Standard provides a framework for operators to follow to cultivate a more responsible and sustainable industry, aiding the sharing of best practice.

Achieving the Standard helped to build trust and credibility with existing and potential new customers. It demonstrates our commitment to responsible gambling and raises our reputation in the UK, and in other potential territories.

Internally, the Safer Gambling Standard helped us further promote a positive corporate culture and improved our employee engagement in responsible gambling, which is evidenced in our company survey results. By prioritising employee training and education on responsible gambling, it helped to create a more supportive and ethical workplace."

HEAD OF RESPONSIBLE GAMBLING, ONLINE GAMBLING OPERATOR

# Upcoming Changes to the Standard

The Standard is reviewed at least annually to ensure it continues to encourage safer gambling innovation amongst operators. Here we outline changes expected for version 5 of the B2C Standard in late 2023. You can download the Standard at: [www.safergamblingstandard.org.uk/the-standard](http://www.safergamblingstandard.org.uk/the-standard)

There have been several changes to the Standard requirements for version 5, these include:

- Most of the previous governance requirements have moved from the Advanced Level to an expectation as part of the Base Level. This has been replaced in the Advanced Level by more focus around Leadership Strategy, Commitment & Oversight.
- More content has been added to self-exclusion to reflect regulatory changes/cross brand self-exclusion option, and to promote good practice in re-instatement after return from self-exclusion. It is also proposed that operators should offer product blocking/ advertisement blocking when someone self-excludes.
- The Customer Management pillar has been updated to reflect additional requirements from new UK Gambling Commission customer interaction guidance. Financial vulnerability, as set out in the White Paper and related consultations, has also been included.
- Single Customer Account requirements have been strengthened to include different brands or companies within a group of companies to ensure that the business has an accurate risk profile of the customer.
- Definition of 'Young Persons' has been raised from 18 – 21 to 18 – 24 years to reflect White Paper proposals.
- Minor changes in training and performance management requirements to better reflect what is expected in terms of regulation and good practice, and what can be further promoted through Advanced Level good practice.

# How the Standard Works



# Highlights

Follow GamCare's  
Safer Gambling  
Team on LinkedIn



The Safer Gambling Standard (SGS) continues to grow.

At time of publication in September 2023, we have 23 organisations that are certified, covering over 80 different brands

Advanced  
Level 3

11

Advanced  
Level 2

8

Base  
Level

3

- These 23 SGS certified operators between them manage over 2,700 gambling venues and 44,000 lottery outlets. That means many more customers are in safer hands thanks to the commitment of operators to the Standard.
- In 2022-23, across 14 assessments, the team reported 46 requirement actions (mandatory changes before being able to obtain certification) as part of the assessments carried out, and a further 246 recommendations to operators.

- 34 land-based and online operators have been through the process since January 2019, with five of the largest operators all certified or in the process of being assessed.
- Our satisfaction survey shows that 90% of respondents would recommend the SGS assessment to someone else.
- In August 2023, GamCare was accredited by The United Kingdom Accreditation Service (UKAS) (ISO/IEC 17065).

“

Through my own experiences I have seen the huge impact gambling related harm can have on all parts of a person's life. I fully support GamCare's Safer Gambling Standard work, which identifies how gambling operator standards can be raised and ensures fewer people are harmed in the same way I was.”

LIAM, LIVED  
EXPERIENCE FORUM

“

It was a pleasure to go through this process. Frank was an absolute pleasure to work with and very inspiring to talk to. I felt privileged to have an open communication line with Frank and our two-way conversations sparked even more enthusiasm for us to do more and better in the future... We feel very strongly about this topic and being able to talk to someone and measure our approach is helping us to develop into a stronger operator.”

HEAD OF COMPLIANCE & MLRO,  
LAND-BASED CASINO OPERATOR

# Standard Recognised by UKAS

In August 2023, the Safer Gambling Standard was accredited by the United Kingdom Accreditation Service (UKAS) (ISO/IEC 17065 international standard audit of certification schemes and bodies).

UKAS ensures certification schemes are operated in a competent, consistent and impartial manner. This award, which GamCare first applied for in October 2021, has been a huge piece of work for the team in helping evidence the impartiality and integrity of the Standard.

Going through the process has been no small feat. The team has worked incredibly hard with UKAS assessors over the past two years. Having our operations audited by UKAS has also required us to submit large amounts of evidence on how we conduct our work as part of our assessments.

It has also involved UKAS joining two live assessments we have conducted over the past year – one with a B2C business and one with a B2B business – we are very grateful to the operators that allowed this to happen. Going through this process provided valuable insights into how the Standard assesses and evaluates the gambling industry's practices and safeguards to protect customers.

Additionally, the team has also responded diligently to improvements and recommendations that UKAS have given us throughout the process. Changes included establishing a

Safer Gambling Standard Corporate Governance sub-committee who meet at least annually to review potential conflicts of interest, as well as updates to our related governance policies and contract terms.

With all the effort that had gone in behind the scenes towards this process, we were delighted to receive the news that we had achieved UKAS accreditation.

Being recognised by UKAS is an important step in demonstrating how the Safer Gambling Standard can help protect customers from gambling harm. It is an important milestone for us in ensuring a safer environment for customers. We look forward to building on this momentum in the coming years.



ISO/IEC 17065

“

I am delighted that the Safer Gambling Standard has been accredited by UKAS. This external validation attests that our safer gambling assessments of operators are carried out in a rigorous, consistent and independent manner. We are proud of the robust governance systems that have been recognised through this process.”

MARGOT DALY, CHAIR OF THE BOARD OF TRUSTEES, GAMCARE

10

11

# NatWest Bank – Expecting Higher Standards from Operators

In May 2023, NatWest Banking Group became the first bank to prohibit relationships with gambling operators who have not achieved Safer Gambling Standard Advanced Level 2 by 2024.

NatWest recognise that the activities of their customers can have environmental, social and ethical (ESE) impacts – including polluting activities and the potential for human rights infringements.

ESE risk forms part of NatWest Group's overall Reputational Risk Policy and requires enhanced due diligence to be performed for certain customer relationships, transactions, activities and projects. To manage these risks, NatWest have developed Risk Acceptance Criteria for sectors which present heightened ESE risk (including the gambling sector) and define the level of ESE risk the bank is prepared to accept.

This has led to NatWest taking the decision to only provide banking services to gambling operators who have achieved Advanced Level 2 of the Standard or above.

In the criteria, NatWest Group say, "We consider customer relationships carefully and will only do business with companies who are committed to the highest level of customer care and place safer gambling at the forefront of their operations and strategy."

Read the full criteria at: [www.safergamblingstandard.org.uk/natwest-sgs](http://www.safergamblingstandard.org.uk/natwest-sgs)

## What is meant by SGS Advanced Levels?

The Standard offers a stepped certification consisting of four levels (Base Level through to Advanced Level 3). Operators who achieve Advanced Level 2 or higher must be able to demonstrate that they are developing or have adopted a range of safer gambling measures that go beyond the social responsibility provisions of their gambling licence.


Those that achieve Advanced Level 3 go even further – having evidenced adoption of a wide range of robust safer gambling measures including demonstrating a greater likelihood of supporting and ultimately refusing to accept business from customers identified as experiencing gambling harm at an earlier stage.

# Common Assessment Findings and Recommendations

The Safer Gambling Standard offers a great opportunity for gambling operators to improve their safer gambling practices. Here we identify the most common findings across each area of the assessment in 2022-23, as well as actions taken by operators as a result.

## Culture & Governance


### Assurance Processes


 **Finding:** Operators need to ensure they have a robust three lines of defence framework in place, including a quality assurance (QA) process.

 **Recommendations & actions taken:** Operators' safer gambling teams should be restructured to support the three lines of defence framework. An operator actioned this recommendation by changing their compliance team structure to include all three lines of defence. The operator also improved their ongoing compliance monitoring processes and procedures. ✓

## Customer Environment

### Safer Gambling Tool Innovation

 **Finding:** Operators should allow customers the ability to restrict the type of product they can use and to block gambling at certain times of day/night e.g. in the early hours. This may be particularly valuable to customers who are concerned about or have exhibited harmful gambling behaviour by gambling at these times.

 **Recommendations & actions taken:** Operators should innovate to provide safer gambling tools to customers which go over and above those required by regulation. Such tools or innovations can include those referred to above. An operator actioned this recommendation by introducing curfew and product blocking as additional safer gambling tools for customers. ✓

## Product Risk Assessments

**Finding:** Operators need to review the type of products they offer customers and confirm this in a Product Risk Assessment document. This will help ensure that all staff involved in reviewing products from a safer gambling perspective understand the type of products the business will and will not offer customers.

**Recommendations & actions taken:** Operators should review their product risk assessment policies and processes in respect of the approach to safer gambling. Product Risk Assessments should also include other factors such as default stake limits set on games, which ideally should be at the lowest staking levels. An operator actioned this recommendation by reducing their stake limit by 80%. ✓

## Customer Management Safer Gambling Operations

**Finding:** Safer Gambling Teams not operational 24/7 and no cover during the night, limiting protection in place during higher risk gambling periods.

**Recommendations & actions taken:** Operators should ensure that sufficient cover exists to quickly identify and reduce risks associated with overnight play. An operator actioned this recommendation by implementing a 24/7 operation to help monitor and protect customers. ✓

## Self-Exclusion Reactivation Procedures

**Finding:** For accounts to be reactivated following self-exclusion, 'reactivation' customer calls could be further enhanced by asking the customer to consider what may have changed in their circumstances which makes them comfortable to return to gambling.

**Recommendations & actions taken:** Operators should review their self-exclusion account reactivation procedures to encourage the customer to reflect on their gambling behaviour. An operator actioned this recommendation by reviewing their reactivation procedure, adding questions on what actions the customer took during the exclusion period and what they wanted their new limits to be, rather than default amounts previously offered. ✓

## High Spending Accounts

**Finding:** Operators only review a limited number of high spending customer accounts from the previous day.

**Recommendations & actions taken:** Operators should increase the number of high spending accounts monitored and reviewed daily. An operator actioned this recommendation by increasing the number of accounts under review by 50%. The operator also committed to keeping this continually under review, with an aim of increasing these numbers further. ✓

## Colleagues

### Personal Management Licence (PML) & Escalated Risk Training

**Finding:** Operators' PML holders have previously received formal training commensurate with their PML responsibilities. On checking training records, these have not been renewed within the last twelve months, along with new PML holders.

**Recommendations & actions taken:** Operators should schedule formal training for existing and new PML holders and have a process in place to check training records are up to date. An operator actioned this recommendation by arranging formal training for all PML holders and implementing a process to ensure training records were up to date and refresh training taken annually. ✓

## Collaboration

### Sharing Good Practice

**Finding:** Operators have mapped out ways in which they collaborate with stakeholders in the gambling sector through various methods including trade body working groups and other forums.

**Recommendations & actions taken:** Operators should be more proactive at working with research parties and universities to further the understanding of gambling harms, particularly given their significant customer database. An operator actioned this recommendation by undertaking a review of opportunities to collaborate and support research projects within the sector and with local universities. ✓





# Interview with an SGS Assessor



Frank McCready, Senior Safer Gambling Manager at GamCare, shares his reflections from the past year on raising standards of player protection.

## What have been your biggest learnings from assessing operators in the past 12 months?

One of the biggest things we have seen is that safer gambling has become more ingrained into board-level discussions. This is welcome as we know how important embedding this culture right from the top is when it comes to setting out an operator's approach to safer gambling. While we know there is more to be done, we have seen greater investment in safer gambling measures from operators we have assessed, and a stronger desire do right by their customers.

## When it comes to raising standards, which area have you seen the most improvement on across the board?

There have been advancements in early intervention and monitoring of customers at-risk. Operators are investing more in technology to support safer gambling teams to identify those whose patterns of play may be highlighting issues.

Operations teams have better access to these reports and the businesses do seem to be evaluating these regularly and consistently looking to make improvements.

## What should operators be thinking about when some of the measures announced in the white paper are introduced?

While several of the measures have been put out to consultation, operators should be readying themselves to ensure they are compliant with what is to come. It is important that they communicate clearly with their customers to highlight what changes are coming and why. Finally, we hope to see a consistent approach across all operators to give the new measures the best possible chance of protecting people from harm.

## What is the biggest barrier for operators taking the Standard?

A lack of certainty in the regulatory landscape has been a big concern for operators but with the release of the white paper we are seeing renewed interest in the service. Operators are sometimes concerned that they will fall short of achieving certification, or that they will not fare as well as competitors. To this we say – get in touch, if you don't feel ready for the Standard yet, we offer pre-assessment options which you can complete prior to committing to a full assessment. The earlier you start thinking about the process, and engaging with GamCare, the easier it will be.



We recognise the importance of creating opportunities to evaluate our approach to player protection. The Safer Gambling Standard provided a secure, collaborative space, where the assessors came with genuine interest to understand who we are, how we support our players and what we hope to achieve.

With the easy-to-use portal, supporting documents were uploaded allowing time for the on-site visit to fully focus on seeing our processes in action, absorbing the culture of our teams. With remote working favoured over the last few years, our highlight of the assessment, was being able to show the end-to-end journey of an interaction, between operator and player.

[Our company]...sets high standards for player experience, with a focus on innovating change. GamCare's Safer Gambling Standard forms part of that innovation, to ensure we do not get complacent and can continue to lead the way for a safer gambling experience."

HEAD OF PLAYER RISK,  
ONLINE BINGO OPERATOR

# Other Safer Gambling Services

As part of our commitment to the 5 Cs, we offer other products and services to support gambling operators in the following areas.

## Culture & Governance / Colleagues

We offer CPD accredited safer gambling training services centred around gambling harm and interaction. We also provide suicide prevention and eLearning packages, as well as customised training for senior executives looking to develop the safer gambling culture within their business.

Find out more at [www.safergamblingstandard.org.uk/training](http://www.safergamblingstandard.org.uk/training)

Watch our Safer Gambling Training video



## Customer Environment

Our Helpline Transfer Service makes it easier than ever for operators to offer their customers frictionless access to the National Gambling Helpline.

Find out more at [www.safergamblingstandard.org.uk/helpline-transfers](http://www.safergamblingstandard.org.uk/helpline-transfers)

We have also developed industry codes setting out good practices for safer gambling information display online and in venues. This is important for customers, who will see consistent signposting to tools and support, right there in the gambling environment.

Find out more at [www.safergamblingstandard.org.uk/industry-code](http://www.safergamblingstandard.org.uk/industry-code)

## Customer Management / Collaboration

Our Safer Gambling Labs bring together gambling operators, GamCare staff and people with lived experience of gambling harms to work together to find solutions to some of the biggest safer gambling issues today. In the past year, we have reviewed self-harm threat procedures and fairness complaints, undertaken vulnerability reviews and gap analyses, and completed communication strategy reviews.

Find out more at [www.safergamblingstandard.org.uk/sglabs](http://www.safergamblingstandard.org.uk/sglabs)



The GamCare team are experts in their field. I have been so impressed by their work ethic, reliability, and quality of the training. They live and breathe their own ethos of empathy and deliver on the spirit of Motivational Interviewing every day. I have learned so much and have valued the collaboration with our business and teams".

HEAD OF LEARNING & DEVELOPMENT, ONLINE & LAND-BASED GAMBLING OPERATOR

## **GamCare**

91-94 Saffron Hill  
London  
EC1N 8QP

**020 7801 7000**

Charity Number: 1060005

Charitable Company Registered  
in England No: 03297914



**[safergamblingstandard.org.uk](https://www.safergamblingstandard.org.uk)**

Publication date September 2023

