Internet Responsible Gambling Standards

Revised December 2023

Introduction

All forms of gambling have the potential to bring both positive and negative consequences to the customer. Internet gambling is no exception. Online gambling comes with inherent risks, and these guidelines were created to help mitigate some of those risks. The most ethical and economical way to mitigate gambling-related harm is a comprehensive public health strategy that includes the full spectrum of services: research, prevention, intervention, treatment, and recovery. Responsible gambling is a vital element of both the prevention of and intervention for gambling-related harm. The gambling industry plays a key role in preventing gambling-related harm. The National Council on Problem Gambling (NCPG) developed these Internet Responsible Gambling Standards as a template on which to guide operators, regulators, and vendors to base their programs to ensure that player protection remains at the forefront of operations.

The Internet Responsible Gambling Standards (IRGS) were initially developed in 2012 and were most recently updated in 2023 to reflect new regulations and technology. These standards have provided guidance for responsible gambling regulations in several states as online gambling has developed in the U.S. The recommendations in this document come from NCPG's experience in problem gambling versus responsible gambling, empirical evidence, existing international codes, and feedback from experts in the field, including operators, regulators, vendors, researchers, clinicians, and advocates. The standards are continually evolving as gambling-related legislation, regulation, and technology change the gambling landscape. The IRGS are intended to be applied across all internet-based platforms (including web, desktop, mobile, app, and any other device that can be used for internet gambling) and all forms of gambling (including lotteries, mobile sports betting, daily fantasy sports, iGaming and more).

The National Council on Problem Gambling strongly recommends that operators, regulators, and vendors consult with experts in the field of problem gambling and responsible gambling during the development and implementation of internet gambling. Consultation with these experts, as well as the use of these guidelines, will help mitigate the inherent risk associated with gambling that has been shown to cause gambling-related harm, including problem gambling and gambling addiction. Like other mental health disorders, gambling addiction will likely never be eliminated, but better efforts must be made to mitigate the damage.

About the National Council on Problem Gambling

The National Council on Problem Gambling is the only national nonprofit organization that seeks to mitigate gambling-related harm. NCPG was founded in 1972 and is non-partisan and neutral on legalized gambling.

NCPG remains committed to establishing and maintaining partnerships with companies that are committed to responsible gambling. The IRGS creates a template on which companies can base their programs to ensure that player protection remains at the forefront of operations.

Terminology

Before reviewing the IRGS, it is important to apply standard definitions for commonly used terms throughout the document.

Gambling is the wagering of something of value on a game of chance-seeking a reward, where instances of strategy are discounted. By this definition, gambling requires three elements to be present: consideration (an amount wagered), risk (chance) and a prize (reward).

Responsible gambling refers to practices, policies and behaviors to ensure that gambling remains a safe and enjoyable activity for individuals who choose to participate. Responsible gambling initiatives are designed to prevent and reduce potential harm associated with gambling, promote consumer protection, improve community and consumer awareness and education, and provide referrals to resources offering treatment and recovery.

Problem gambling refers to gambling behavior patterns that adversely affect an individual, family, or community. These can include financial, physical, emotional, societal and other effects. Gambling can negatively impact someone's family, job, or health. Additionally, individuals who experience problem gambling are at risk of developing a gambling disorder.

Gambling disorder is a recognized mental health diagnosis. Gambling disorder is characterized by a host of symptoms, such as needing to gamble with increasing amounts to achieve the desired excitement, lying to hide gambling activity, and repeated unsuccessful efforts to control, cut back on or stop gambling.

Note: The use of the term 'company' is meant to include operators, regulators, and vendors throughout this document.

The IRGS presents ten categories of recommended guidelines, each with its own section in the document. Each category is broken down with subheadings that provide more concrete information on what the IRGS recommends for successful implementation.

Governance

Corporate Responsible Gambling Policy
A Corporate Responsible Gambling Policy identifies the company's clear commitment to responsible gambling, player protection and mitigating gambling-related harm in all strategic directions. The policy outlines expectations for leadership participation in responsible gambling efforts, including designating an executive/senior staff responsible for implementing responsible gambling policies, procedures and continuous development of responsible gambling initiatives. The contact information related to this executive is listed publicly on the platform. A review of the Responsible Gambling Policy is done annually.

Responsible Gambling Strategy
The company has a Responsible Gambling Strategy with defined goals and a clear plan of action including timelines, risk assessments, measurable expected outcomes, and metrics of success. The strategy is evaluated annually for progress, and the report is made publicly available. The strategy incorporates all recommendations from the IRGS.

Policy and Staff Updates
The responsible gambling staff member is interconnected throughout the company and assists in integrating responsible gambling into the organizational culture and everyday practices. There is a process in place to update responsible gambling policies and procedures on an annual basis. The responsible gambling policies and procedures are based on the latest best practices and include feedback from internal and external stakeholders. The policy ensures regular reminders to all staff about the company's responsible gambling policies, as well as updates on industry best practices annually, at a minimum.

Employee Protection
The Employee Gambling Policy is clear and is provided to staff. The policy outlines the increased risk of gambling harm that employees may face and explains how they will be supported by their employer if impacted by a gambling problem.

Training

Annual Training Content
All staff, including new hires, receive updated annual training on responsible gambling with content including, but not limited to:
- Definitions of common responsible gambling key terms
- Myths and facts about gambling
- The company's responsible gambling policies and strategy
- The role each staff member/department plays in contributing to player protection and harm reduction
- The employee gambling policy
- The 'problem gambling' helpline specified/approved in regulations.
- Available responsible gambling tools (including limit setting, self-exclusion/timeout, etc.)
- Online gambling blocking software
- Local/virtual treatment and recovery resources

Customer-facing staff have additional annual training on customer protection, responsible gambling, and problem gambling interventions. This enhanced training includes the above content as well as, but not only, the following content:
- Definitions of problem gambling and intervention key terms
- Myths and facts about gambling
- The spectrum of gambling behavior
- Signs/symptoms/triggers of problem gambling
- How customers can access help with problem gambling and the types of help available
- How to use responsible gambling tools from a customer perspective
- Employee self-care and debriefing tools to be used after assisting customers experiencing potential problems
- Empathic skills and procedures specific to their position to respond to situations where a customer may experience distress (e.g., scripts, examples, etc.)
- Crisis/suicide prevention resources

Training Development and Updates
The training content is updated regularly, at least annually. Some elements of the training are interactive. For example, interactive training could include live, online training, role-playing, face-to-face training, user-led content, etc. The training is developed or evaluated by an unaffiliated third party with experience in problem gambling/gambling disorder and responsible gambling. The training should be developed with the inclusion of lived experience, perspectives and experiences with gambling-related problems.

Effectiveness
The training effectiveness is evaluated through a formal mechanism, such as pre- and post-tests. Trainee feedback is collected and reviewed. Customer-facing staff skills are regularly assessed through customer service requests, and by looking at how they are handled.

Supporting Player Decisions

Information and Tools
Customers are provided with highly visible and readily accessible tools and information to help them make informed decisions about their gambling. This information has been designed with accessibility in mind and ensures equitable access for all individuals, including those with disabilities. All information and tools are presented in clear and plain language (maximum sixth grade reading level), and they appear on the platform and in languages commonly used in the state.

The responsible gambling information includes, but is not limited to:
1. Practical tips on how to keep gambling within safe limits
2. Education and encouragement to use responsible gambling tools and features upon account setup
3. Information that corrects common misperceptions about gambling
4. Functionality of each game
5. Information on randomness, house edge, odds of winning and payout ratios, where applicable
6. Tips on preventing access to a customer's account by underage, unregistered, unauthorized or excluded customers
7. Risks associated with gambling
8. Signs of a potential gambling problem for themselves or their loved ones
9. Behaviors and other coexisting conditions that are often related to problem gambling
10. How to access personal data on gambling behaviors and activity
11. Direct link to a problem gambling helpline specified/approved in regulations

Customers are prompted to confirm they have read the information about available tools and resources. Players receive on-screen prompts, messages, or updates on the tools for responsible gambling that are available to manage their play. The company utilizes behavioral tracking data to advise at-risk players to use responsible gambling tools. The company regularly assesses the uptake of responsible gambling tools and makes updates/changes as necessary to increase participation in player protection measures. The responsible gambling information and tools are readily available across all platforms (including web, desktop, mobile, app and any other device that can be used for internet gambling).

Content Development and Dissemination
Regular input from individuals with lived experience and with support providers is sought and incorporated to improve and enhance information and resource effectiveness. Responsible gambling information is created based on an understanding of players' needs and behaviors. All responsible gambling materials and information are readily accessible on the platform's dedicated responsible gambling section. The company regularly uses social media channels to promote and publicize responsible gambling tools and messaging.

Testing and Evaluation
All external links to treatment providers and other support services are tested regularly, at least annually.

Time and Budget Management

Account Information
Customers have instant access to their personal gambling history and account details, including, but not limited to, the following:
- Amounts wagered, won and lost by week and month
- Time spent gambling by day, week and month
- Money spent by day, week and month
- Money spent by game/vertical
- Number/type of games played
- All details of deposits, withdrawals, and overdrafts
- Movement of funds between products
- Restrictions, such as self-exclusion events and limits
- Number of occasions where time/money limits were met
- Frequency of time and spending limit adjustments
- Net outcomes, including profit and loss over a user-defined period.

This information is readily available across all platforms (including web, desktop, mobile, app and any other device that can be used for internet gambling). Customers receive live, onscreen spend and time updates on an hourly basis during play. Spend limits are displayed in cash, not credits.

Limit Setting
Customers must set limits on the amount of money and time they spend using the platform across all products. The platform requires customers to set limits upon account setup. Limit-setting features are also advertised on the platform. Customers receive individualized messages when they regularly change their deposit, loss and/or time limits. The company encourages or incentivizes limit usage.

Examples of limit setting include:
- Customers can set daily, weekly, or monthly limits on the size of deposits.
- Customers can set daily, weekly, or monthly limits on the amount of time spent on the platform.
- Customers can exclude themselves from specific products or game types (e.g., sportsbook/casino).

Play is automatically and immediately stopped when the limit is reached, and the customer is notified that they have reached their selected limit. Customers cannot relax limits until current

limit settings expire. Customers may view the status of their limits on the account details page. The account details page is accessible across all platforms.

Withdrawals
A clear explanation of the withdrawal process is available to customers on the platform. When a withdrawal is requested, the platform requires the customer to confirm that this decision is irreversible. To encourage breaks in play, the platform is set up to restrict bonus offers, promotions, etc., during the withdrawal process.

Time-Out and Self-Exclusion

Time-Out
Customers can set time-outs, also known as break periods or cool-offs. Time-outs are instant stops in all access and play that are available in lengths of at least 12 hours but less than six months. Longer stops in play are available under the self-exclusion procedure. A player who requests a time-out is also provided with information on how to self-exclude. At the end of the time-out period, play is not automatically resumed. Players are prompted to determine if they want to resume play or renew the time-out. This option is presented in the platform but not as a push notification.

Self-Exclusion Setup
Self-exclusion is a long-term, customer-initiated restriction on their ability to play on the platform. The self-exclusion functionality is no more than three clicks from anywhere on the platform after logging in. Instructions on how to self-exclude are presented in clear language, using a font size that is standard to the remainder of the platform and easily accessible. Messages to customers do not dissuade them from self-exclusion. Customers can self-exclude at the product level—meaning they are not required to self-exclude from the company's entire offerings (though they can select to do so, should they choose). When multiple products are available, it is clearly stated in self-exclusion guidelines and procedures which products are eligible for restriction, and these prompts encourage restriction from all products. The options for the length of self-exclusion range in increments from six months to lifetime. All self-exclusions, regardless of length, are irrevocable until the expiration date.

During self-exclusion registration, the customer is provided clearly-worded information outlining the conditions of the restriction and via email following registration. Customers who self-exclude are provided information via their preferred contact method, as determined in their account settings, about available help, and prevention services (e.g., the helpline specified/approved in regulations, online gambling blocking software, local treatment and recovery resources, etc.).

Self-exclusions take effect immediately. The customer's account is closed or suspended upon the company's receipt of the self-exclusion application so that no deposits or bets can be placed.

The time-out and self-exclusion pages on the platform include resources for assistance, including, but not limited to, the problem gambling helpline specified/approved in regulations, software options for blocking online gambling, and local treatment and recovery resources.

Conditions of Self-Exclusion

During self-exclusion registration, the customer is provided clearly-worded information that outlines the conditions of the restriction, and also via email following registration. Minimally, this information includes the following:

- Length of self-exclusion
- Account closure processes and consequences for any accounts breaching restriction (e.g., a new account opened by the same person during the self-exclusion)
- Notification of removal from promotions and direct marketing
- Requirements for reinstatement upon expiration of the self-exclusion
- How open bets, reward points, scheduled payments and remaining balances are handled
- A record of customer data is provided outside the platform in an easily-accessible file format (e.g.,
  - PDF including amounts wagered, won and lost
  - time and money spent
  - games played
  - net wins/losses
  - games played
  - all deposits, withdrawals, and overdraft occasions
  - movement of funds between products
  - bonus information
  - restrictions such as self-exclusion events and limits
  - number of occasions where time/money limits were met
  - frequency of limit adjustments
  - and net outcomes including total won or lost over a defined period)
- The responsibilities of the customer and the company during the self-exclusion period

Information sent to customers who self-exclude does not include promotional materials. If a customer attempts to set up a new account, they are notified of the reason they were prevented from playing, and provided resources, including available help and prevention services (e.g., the helpline specified/approved in regulations, online gambling blocking software, local treatment and recovery resources, etc.).

Self-Exclusion Renewal
Customers may renew their self-exclusion if it was set for a term less than a lifetime. Customers who renew their self-exclusion are provided information about problem gambling and help resources, including, but not limited to, the problem gambling helpline specified/approved in regulations, online software for gambling blocking, and local treatment and recovery resources.

Self-Exclusion Reinstatement
Accounts require customer-initiated reinstatement after the expiration date. Systems are designed to ensure that customers are not automatically notified at the end of the self-exclusion period. Excluded customers do not receive any promotional materials until the reinstatement process is completed.

The reinstatement process is facilitated by trained customer-facing staff who communicate with the customer about their readiness to resume play. The customer must indicate they want to be reinstated prior to reinstating the account. When a customer initiates reinstatement, they receive assistance through the process and are explicitly encouraged to utilize available responsible gambling tools (e.g., tutorial on how to set financial and time limits on the amount bet and time played). Customers are provided information about local treatment and recovery resources in case they experience gambling-related harm after reinstatement. When a customer is reinstated, they are notified that their play is tracked, monitored, or limited for a specified period to ensure they are not still at risk.

Customer Support

Customer Service Access
The company must provide live customer service via phone and at least one electronic method of communication (e.g., email, chat, text). Customer service contact information is prominent and widely accessible throughout the platform, including, but not limited to, the responsible gambling and help/resources pages. In all instances, the customer service and helpline phone numbers are clearly distinguished from each other.

Customer Response Policies
Clear policies are in place for all levels of staff to assess and respond to situations where a customer indicates they are in distress or are experiencing problems related to their gambling. Policies are in place to address concerns of a third-party (e.g., spouse or relative) about a customer's gambling behavior. All staff have access to information about the problem gambling helpline specified/approved in regulations; self-exclusion, time outs and limits; responsible gambling basics; online gambling blocking software; local treatment and recovery resources; crisis/suicide prevention resources, etc., and can provide that information on request and when encountering customers in distress.

The company has policies and systems in place to monitor customer activity for signs or indicators of problem gambling. The company utilizes behavioral tracking data to advise at-risk players to use responsible gambling tools. The policy details the available internal and external resources and regulations around privacy and/or personally identifying information.

Complaints

The complaint, dispute and resolution processes are clear, accessible, and easy to find on all platforms. The company utilizes complaints and dispute reports for the purpose of improving player protection.

Marketing & Advertising

Responsible Marketing Policy

The company has a clearly-articulated commitment to responsible marketing, including advertising and promotion. The Responsible Marketing Policy clearly outlines the company's intentions, objectives, and goals regarding the marketing of responsible gambling. The company publishes its commitment to responsible advertising and promotion publicly on its platform.

Content Integrity

All marketing provides accurate expectations about the outcomes and risks of gambling. Key points include:

- Gambling must not be presented as a way to solve financial problems
- Marketing and advertising must not encourage excessive or unaffordable spending
- Marketing and advertising must not misrepresent the chances of winning
- Marketing and advertising must not appeal to minors
- The odds of winning or losing must not be misleading
- Gambling must never be presented as risk-free

Communications with customers refrain from intentionally encouraging customers to:
a) increase the amount they play with
b) gamble continuously
c) re-gamble winnings and
d) chase losses

There is a risk assessment and evaluation process for all marketing and advertising campaigns or content that may be viewed by people with gambling problems, populations at greater risk of developing gambling problems, or underage populations. Any identified mitigating factors are included in a campaign, should these be required in the case of medium- to high-risk content. Bonus and other offer conditions are clear, simple, and easy to access. All physical and digital content associated with responsible and problem gambling are not paired with promotions or play-related rewards programs.

Advertising Targeting

Adults of legal gambling age are the sole intended audience for the company's marketing, advertising, and promotion. All social media channels are age-gated where possible and clearly signaled as 18+ in all instances. The company makes an intentional effort to avoid marketing to audiences at higher risk for gambling disorder and those under the legal age to gamble. The company has an advertising risk assessment and evaluation process in place for campaign targeting that considers the potential negative impact on minors. Campaigns are not misleading about the level of risk involved or the opportunity to make money. Gambling is clearly presented as a form of entertainment. Customers are given the option to opt in or out of email, direct messaging, and SMS marketing messaging at any time.

The result of these efforts is that the primary audience of the company's advertising and promotion is not people experiencing gambling-related harm or populations at greater risk of experiencing gambling-related harm, including underage populations. The company shows a proactive and responsible approach with demonstrable safeguards in place when developing and placing advertising and promotions that may be seen by audiences who are statistically at a higher risk of experiencing gambling-related harm. The company effectively balances objectives by striving to minimize potential harm while simultaneously reaching the desired target demographic.

Frequency of Communication

Customers have the capability to request to reduce the frequency of or to opt-out entirely of direct advertising/marketing at any time.

Game Play

Display Cash

Game currency must not be misleading. In all instances, game currency is displayed as cash (USD), not credits, points, tokens, etc.

Game Features

The platform does not allow customers to play games automatically using an auto-play feature. Game functionality refrains from using features that promote gamblers' fallacies, reinforce myths or give the illusion of control. The game and platform function allows players to block individual access to certain products.

New Features

Before publication, all new games and platform technology are reviewed for possible impacts on gambling-related harms utilizing a risk assessment protocol (e.g., GamGard or ASTERIG).

Free Games

Free or demonstration games are not available to play without first signing into an account to restrict availability from specified populations, including minors or individuals who requested a time-out or self-exclusion, etc. Free or demonstration games have the same payout percentages, odds, and age restrictions as paid games.

Encouragement to Continue

Customers are encouraged to withdraw winnings instead of continuing to play using winnings. Communications with customers must refrain from intentionally encouraging customers to:
   a) increase the amount they play with
   b) gamble continuously
   c) re-gamble winnings or
   d) chase losses

Positive communications with customers may include:
   a) incentivizing responsible gambling tool usage
   b) encouraging taking a break or
   c) educating customers on safer gameplay

Accessibility

All platform functions, games and resources have been assessed for accessibility to ensure access for all eligible individuals. Information on how to request accommodation for those with disabilities is provided in clear and concise language and available in the languages commonly used in the state.

Know Your Customer

Underage Gambling

The minimum age to gamble is clearly stated on the platform. Companies put in place technical and operational measures to prevent access by those who are underage. Age verification is required as a part of account setup and before the deposit of any funds. A reputable independent third party that is common in the business of verifying an individual's personally identifiable information is utilized.

If an underage customer is found, their play is immediately stopped, and their account is locked. If an approved account is found to be accessed by someone underage, the company provides education and resources on the risks associated with underage gambling, locks the account, and requires a cooling-off period prior to reactivation. However, if underage access reoccurs, the account is closed.

Minimum Age

A minimum age of 21 is strongly recommended to access any play, whether free or paid.

Duplicate Accounts

All new account registrations are checked against existing player accounts to ensure duplicate accounts cannot be created.

Payment Methods and Credit

Customers undergo a thorough age and identification verification process in setting up their payment methods. Customers cannot obtain a line of credit from the platform. The platform does not accept credit card payments.

Research, Education, and Treatment

Support

A portion of the company's revenue is dedicated to reducing the social costs of gambling-related harm. Examples can include:
- financial support to treatment programs for gambling disorder and/or affected others
- contributions (monetary or non-monetary) to education and awareness programs that aim to prevent gambling-related harm
- support of general education and awareness programs aimed at impacting vulnerable groups, or
- financial support of research groups/organizations aimed to reduce gambling-related harm and improving responsible gambling initiatives

Player Insight

An evaluation program is in place that monitors, reviews, and improves the effectiveness of responsible gambling policies and player protection mechanisms, including tracking customer usage and uptake of responsible gambling tools.

Public Health Messaging

The company has campaigns to educate the general population on the risks of gambling and all about responsible gambling tools and seeks to normalize safer play and responsible gambling strategies. The company monitors the effectiveness of the general responsible gambling messaging and uses the information to continuously improve marketing practices.

Independent Research

Demographic, play behavior and payment data are made publicly available to qualified researchers for the purposes of researching harm that is gambling-related. Public data is anonymized to remove information that is personally identifying, consistent with federal and state privacy, intellectual property, and laws about the freedom of information.

Conclusion

These IRGS are intended to guide operators and regulators when establishing and regulating forms of internet gambling. NCPG recognizes the IRGS as best practice and utilizes this tool to support operators and regulators to improve existing and future services. Given the rapid evolution of the gambling field, these standards are updated regularly. Sustainable business and public health depend on operators, regulators and vendors prioritizing responsible gambling in partnership with experts on problem gambling.

To evaluate responsible gambling programming, NCPG encourages all companies utilizing online platforms to participate in the Internet Compliance Assessment Program (iCAP), a U.S. accreditation for best practices in player protection in online gambling based on the IRGS. For more information, visit NCPGambling.org/icap.