THE ABB’s CODE FOR RESPONSIBLE GAMBLING AND PLAYER PROTECTION IN LICENSED BETTING OFFICES IN GREAT BRITAIN

September 2013

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CHAPTER 1

INTRODUCTION

The Association of British Bookmakers (ABB) is the leading trade association for Licensed Betting Offices (LBOs) in Great Britain and represents the operators of around 80% of LBOs in Britain, including Gala Coral, Ladbrokes, Paddy Power, William Hill and about 100 independent bookmakers.

Betting is a popular British pastime with around 8 million people visiting LBOs. The vast majority of customers enjoy betting responsibly and safely. Retail bookmakers are already highly regulated and socially responsible businesses committed to upholding the highest standards and complying with a dual-licensing regime. They require an operating license from the Gambling Commission and a premises license from a local authority. In addition, certain senior individuals are required to hold a personal license, also issued by the Gambling Commission. A combination of the 2005 Gambling Act, Licensing Conditions and Codes of Practice (LCCP), Gaming Machine Technical Standards and Premises License Conditions provide exacting standards to which operators must adhere. It is within this context that overall rates of problem gambling have remained stable and relatively low in the UK, at under one per cent, since 1999.

However, we fully understand that there is some public and political concern. As a responsible business sector we consider one problem gambler to be one too many and we are seriously committed to providing a responsible, safe and enjoyable leisure experience on the high street. To this end we intend to create a step change in responsible gambling thinking based around informed choice by adult customers. This is the first code of its kind to be published in the world, implementing new consumer protection measures that will make a difference.

Our new “Harm Minimisation Strategy” focuses on improving our performance at four levels of harm minimisation:

- Issuing clearer and more accessible information on how to gamble responsibly and highlighting the sources of help available;
- Providing customers with new tools such as mandatory time and money based reminders, the ability to set spend and time limits on gaming machines and to request machine session data;
- Training staff to detect the signs of potential problem gambling more quickly and how to interact more effectively with those identified; and
- Undertaking more consistent central analysis of data to identify abnormal activity both in specific shops and, where possible, that relating to individual customers.
We do recognize that there needs to be more research undertaken into what measures are most effective at ensuring harm minimisation. The industry is cooperating fully with the extensive research project into player behaviour (specifically on high stake gaming machines) being conducted by the Responsible Gambling Trust. Given the results of this research will not be available until next year we are launching the ABB’s new Code for Responsible Gambling and Player Protection (the Code) now. This builds on current best practice and implements new player protection measures, many of which go beyond current regulatory requirements, to protect vulnerable people. Launching the first of its kind for the betting shop sector in the world, the Code will include new gaming machine initiatives such as mandatory time and money spent alerts for all players and setting voluntary limits on spend and time.

Expertise in player protection is evolving around the world and the Code will also develop over time with input from key stakeholders and a growing body of empirical evidence. However, the ABB is committed to ensuring that the new measures in this code will come into effect on 1st October 2013 and compliance with it will become a mandatory part of ABB membership. Some technologically driven measures will take 3-6 months to deliver due to need for testing and development of new software solutions being installed in 33,000 gaming machines in betting shops in Great Britain. However, ABB members will work with machine operators to ensure that the time frames are as short as possible. These timescales are clearly indicated in the Code.

The Code of Conduct will be evolutionary. ABB is fully committed to both monitoring compliance to the code and to updating and strengthening the code as new technological solutions are developed, new empirical evidence is produced or new concerns emerge over the coming months/years. The ABB will also formally evaluate the effectiveness of the measures contained in this code by establishing new Responsible Gambling Committee which will meet at least quarterly and review both compliance with the code and the detail of the code, making recommendations as necessary. The Committee will have an independent (non-bookmaking) chairman and an independent adviser who is knowledgeable and respected in this area of gambling related harm. The ABB Responsible Gambling Committee will be operational by 1 January 2014.

We will also ask the RGT if they could evaluate the impact of the new machine measures as part of their machines research.
In the context of the Gambling Commission’s new surveys on participation and problem gambling ABB members are willing to work together in partnership with the Gambling Commission, RGT and RGSB to develop and fully fund the framework of a British Gambling Prevalence Study in 2014, with a view to adding to the knowledge base to help guide new harm prevention strategies. We believe this prevalence study is one way of measuring the effectiveness of the current statutory regulations and the new measures detailed in the ABB’s voluntary Code of Conduct.
CHAPTER 2

EXISTING BEST PRACTICE IN RESPONSIBLE GAMBLING

SHOP SAFETY

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

The Association of British Bookmakers and its members have worked constantly to identify an achievable, realistic and cost-effective solution to reduce the offences against their members, staff and customers. For example, the Safe Bet Alliance was launched in 2010, after a series of robberies in LBOs in London. The Metropolitan Police Flying Squad had been tracking these incidents and worked with the industry, through the ABB, to put in place a voluntary code of safety and security, setting single national standards for bookmakers, covering shop safety and security for the first time.

In the first year of SBA's operation, in London alone, there was a 46% reduction in robberies and a 55% detection rate. The decline in offences has continued, highlighting the sustainability of the initiative. In 2011 the Safe Bet Alliance won the prestigious Home Office Tilley award for Acquisitive Crime reduction. This award highlights the continued commitment of the ABB and its members to a safer betting environment.

The Safe Bet Alliance also stipulates that operators should only allow lone working once a risk assessment has been carried out, should have a lone working policy which addresses staff safety and should maintain regular contact with lone workers. To highlight the key principles of the national standard the ABB is launching a new accreditation scheme in all shops before December 2013.

The ABB is committed to evolving and improving this national standard with support from stakeholders such as the Met Police, ACPO, BRDO, DWP, DCMS, Gambling Commission, Institute of Conflict Management and Community Union.
FINDING LOCAL SOLUTIONS

Bookmakers are responsible businesses that are always willing to engage and work pro-actively to tackle any issues in communities alongside the police, local authority and other businesses. Since January 2012 ABB members have successfully worked with a number of local authorities to address local issues, many of which do not specifically relate to betting shops.

Betwatch schemes and Local Partnership Agreements are examples of effective tools:

- Bet Watch schemes such as the Ealing project encourage the sharing of information between operators and the police including barring customers who exhibit signs of serious anti-social behaviour from all betting shops in the area.

- Local Partnership Agreements between operators, local authorities and the police set out what councils and the police can do to support local businesses, and how businesses themselves can help to keep the local area safe, clean, green and pleasant places to live. In Lewisham, for example, ABB members have signed the Council’s Deptford High Street Charter and are working alongside the council, police and other businesses to tackle such issues.

The ABB and its members, who appreciate the role that local authorities have in responding to community concerns, are in discussion with a number of councils about similar schemes and welcome further local approaches and dialogue to resolve local issues. The ABB is also committed to evaluating the success of these schemes.

ANTI-MONEY LAUNDERING AND TERRORIST FINANCING

The ABB has published guidance for its members helping them to adhere to their anti-money laundering responsibilities under the Proceeds of Crime Act 2002, Gambling Act 2005 and Terrorism Act 2000.

Through the detailed guidance, the ABB aims to assist its members to implement policies and reporting procedures to ensure the betting sector’s continued compliance with relevant legislative requirements and to prevent betting operators being used in connection with money laundering or terrorist financing.

This is another example of the ABB’s drive to keep crime out of LBOs on an on-going basis.
BETTING INTEGRITY

Bookmakers will always have a vested interest in sports integrity, because it is they who are likely to suffer financial loss from betting related corruption.

The ABB and its members work closely with the Gambling Commission and the European Sports Security Association (ESSA) to identify and investigate unusual betting patterns that may be related to corruption in sport. When an unusual betting pattern is identified and deemed to be suspicious, other operators, ESSA and the Gambling Commission are immediately informed. Information is shared, as appropriate with the relevant sport’s governing body once it has been notified to the Gambling Commission.
CHAPTER 3

HARM MINIMISATION STRATEGIES

STAFF TRAINING AND AWARENESS

The ABB and its members believe that staff initiated interaction with customers along with the responsible gambling information and tools made available can help to protect customers and assist them in making informed choices regarding their gambling.

The aim is to create a cultural shift in the staff mindset which firmly plants more player protection at the heart of activities undertaken by existing staff and makes new staff ambitious to aspire to these high standards.

Specific new measures include:

- All shop staff will be trained, in consultation with providers of responsible 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.
- All shop staff will be actively encouraged to ‘walk the shop floor’ as part and parcel of an enhanced customer engagement role, including initiating customer interaction in response to specific customer behaviour which needs to be addressed.
- All ABB members will nominate a member of staff who will be responsible for responsible gambling on a local basis and will receive additional training to deal with more complex responsible gambling interactions.
- Compliance objectives will be added to the performance agreements of all relevant middle and senior managers working for ABB members and compliance will be a standing item agenda at LBO level performance reviews. The ABB will develop a minimum industry standard for staff training which is hoped will evolve into an accredited system.

This new industry standard will be implemented before March 2014 and reviewed annually. The standard will include:

- Provision of appropriate information on the effects of problem gambling
- Recognition and identification of the indicators of problem gambling
- Conflict management
- Customer interaction in response to specific customer behaviour, referral, and follow up processes
- Effective self-exclusion processes at a local level
- The application of a Think 21 policy, especially with regard to machine players
- The identification of vulnerable groups
- Regular refresher training
- Auditing and testing of staff at least every two years
SELF-EXCLUSION

All gambling operators are committed to effective self-exclusion measures but it is widely recognised that it is a challenging area for everyone. Self-exclusion 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 self-exclusion, it should be facilitated with immediate effect for that particular shop by any member of staff. The ABB reiterates its commitment to the following measures:

- All ABB members will maintain a central self-exclusion register, monitor the number of self-exclusions in each of their shops, have processes to make sure that shop staff are properly implementing self-exclusion, and conduct regular audits of their scheme’s effectiveness.

- Internal arrangements for exclusion from the operator’s other channels and removal from marketing databases.

Bookmakers already encourage customers to enter into a wider self exclusion from other betting shop premises and ABB members will develop processes to ensure positive reinforcement and signposting to those who wish to self exclude e.g. notices which, amongst other information, will include helpline numbers for all the major betting operators.

ABB members will pro-actively encourage customers to also self-exclude from other gambling premises such as arcades, bingo halls and casinos in the immediate local area.

The ABB will consult and collaborate with stakeholders such as other trade bodies, RGT and RGSB before December 2013 with a view to developing monitoring mechanisms (to test the effectiveness of these measures) and improving the above self-exclusion processes before March 2014.

AGE VERIFICATION

The industry takes its responsibility to protect children and young people very seriously and is committed to building on the ABB’s High Street Betting Industry Action Plan and Supplementary Code of Practice on Age Verification (2010).

All operators already enforce a rigid ‘Think 21’ policy, and the large national operators employ their own independent testing companies to ensure standards are maintained at a high level. Recent overall results of independent test purchasing exercises are comparable, or favourable, to those for other age-restricted products in general. This clearly demonstrates that LBO staff members are trained and proactive in asking young-looking customers to provide proof-of-age and refusing service if they cannot do so.

However, we have higher aspirations and wish to raise the bar on compliance systems, risk assessment and monitoring in general. We also recognise that there needs to be even more focus on ensuring that gaming machines cannot be accessed by young people and we need to meet the challenges faced by betting shop staff by developing an environment where intervention and challenge around gaming machines is a “non-negotiable”. ABB members are also committed to siting all machines where they can be adequately supervised from the counter.
The ABB is therefore committed to supporting these new initiatives:

- All shop staff will be actively encouraged to ‘walk the shop floor’ and implement the Think 21 policy amongst machine players.

- The ABB will revise and re-launch the High Street Betting Industry Action Plan with a focus on AV compliance. Members will ensure staff get specific training to prevent under age access to machines. In particular, to encourage the use of the remote counter facility to prevent play prior to the completion of appropriate age verification procedures. The new plan will be launched before December 2013.

- The ABB will fund a new programme of compliance testing undertaken by an independent test purchasing company for independent ABB members where necessary before March 2014.

- The major operators also fully support the Government's new plans to extend Primary Authority to age restricted sectors by entering into Primary Authority partnerships as soon as Parliament passes the legislation.

ADVERTISING AND PROMOTIONS

Advertising is subject to the Committees of Advertising Practice (CAP) and UK Code of Broadcast Advertising (BCAP) advertising codes, which are both administered by the Advertising Standards Authority (ASA) and apply to all gambling operators and advertisers permitted to advertise in Great Britain.

The CAP and BCAP codes cover the content and placement of advertising and ensure that gambling
advertising is socially responsible. The rules ensure that gambling advertising is not aimed at children or young people and that it does not leave vulnerable people open to exploitation and harm.

The Gambling Industry Code for Socially Responsible Advertising was published on 7 August 2007. It is monitored by the Review Group for Socially Responsible Advertising and goes further than the CAP and BCAP codes in some areas. For example, the code covers the inclusion of educational or warning messages, and advertising after the watershed, with the exception of sporting events. Advertising and promotions will not target children. Demonstration games, tournaments and other free bets are also guaranteed to operate at the same statistical target return to player percentage rates as paid game play over a statistically significant amount of plays.

The ABB is committed to the following new measures:

- ABB members will pro-actively promote Responsible Gambling messages such as Gamble Aware and the National Gambling Helpline in all shops. The ABB Responsible Gambling Committee will review the effect of these messages before March 2014.

- The ABB Responsible Gambling Committee will address any concerns about advertising (raised by the industry itself or the public); with members being held to account for any individual cases which whilst not breaching regulations are against the spirit of the legislation. The committee will also have regular discussions with the responsible authorities on this issue. The measure will come into effect before March 2014.

RESEARCH, EDUCATION AND TREATMENT OF PROBLEM GAMBLING

In addition to a commitment to a high standard of staff training in LBOs, the sector makes a voluntary contribution to the Responsible Gambling Trust (RGT). Together, all gambling sectors raise nearly £6 million per annum to minimise gambling-related harm. Key to this are effective education and prevention techniques, designed to prevent people getting to a stage where they have a problem with their gambling. Those that do develop problems require fast and effective treatment and support.

The ABB is committed to the following new measures:

- All members will fully support and co-operate with the work of RGT and will make an annual contribution to the research, education and treatment of problem gambling.

- In the context of the Gambling Commission’s new surveys on participation and problem gambling ABB members are willing to work with RGT and RGSB to fully fund a new British Gambling Prevalence Study in 2014, should RGT and RGSB believe that such a study will add to the knowledge base to help guide new harm prevention strategies.

- All members will ensure that Gamble Aware information indicating where help can be obtained is displayed prominently on machines and elsewhere in shops.

- All members will promote new Responsible Gambling campaigns undertaken by Gamble Aware and the National Gambling Helpline.
CHAPTER 4

NEW HARM MINIMISATION STRATEGIES FOR MACHINE PLAYERS

The gaming machine industry currently operates 238,000 gaming machines of different categories in Great Britain. There are around 33,000 in LBOs, the majority of those being category B2 (casino games) and B3 (slot machines). B2 gaming machines, originally known as Fixed Odd Betting Terminals (FOBTs), were introduced to betting shops in 2002.

The industry accepts that there is some public and political concern about this product and that is why the ABB is going to create a step change in our responsible gambling thinking. This is the first code of its kind to be published in Europe, implementing new consumer protection measures that will increase public confidence in the industry and more importantly make a difference to those machine players at risk of developing a problem with their gambling. ABB members are committed to implementing these measures as minimum standards of harm minimisation which could develop over time. If monitoring and evaluation by the ABB Responsible Gambling Committee, which will have access to independent advice, shows the measures are only marginally effective, then ABB and its members are also committed to replacing measures or changing the specific metrics associated with these measures. As new technological solutions emerge they will also be assessed in terms of improving harm minimisation standards.

PLAYER PROTECTION

1. Voluntary Monetary Limits – Customers will be able to set limits on the maximum amount of money spent during a single session of play. Academic research by Professor Mark Griffiths states this may be particularly useful for games where they can spend a long time on the machine\(^1\). When the player’s personal limit is reached an alert will inform the customer that this money has been spent and the customer will be asked to make a decision as to whether or not to continue to gamble. The question will be asked: ‘Do you want to stop playing?’ According to the above academic research this is a better psychological option than asking the customer to continue playing and it means the customer has to read and acknowledge the duration of their play. Game play will be suspended for 30 seconds and during this time the screen will display responsible gambling messages (in consultation with Gamble Aware and other stakeholders with expertise in this area). The next spin cycle will not commence until after the break in play. In the past GamCare’s protection code has advocated a break in game play for 3 seconds and ABB members believe it is socially responsible to provide a longer break. Activation of the alert will also appear behind the shop counter which may offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.

2. Voluntary Time Limits – Customers will have an option to set limits on the maximum amount of time spent during a single session of play. According to the above academic research under 1 this enables customers to plan and pre-set their gambling behaviour. When the player’s personal limit is reached an alert will inform the customer that the time allocated has been reached and the customer will have to decide whether to continue to gamble or not. The question will be asked: ‘Do you want to stop playing?’ Game

\(^1\) Auer & Griffiths, 2013; Griffiths 2003; Smeaton & Griffiths, 2004; Griffiths & Wood, 2008
play will be suspended for 30 seconds and during this time the screen will display responsible gambling messages (in consultation with Gamble Aware and other stakeholders with expertise in this area). The next spin cycle will not commence until after the break in play. Activation of a time limit alert will also appear behind the shop counter which may offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.

3. The industry faces challenges in defining a customer session as personalised data is not recorded on machines. To provide a better and consistent understanding of player behaviour and to make it easier to assess and track data it is important that the industry agrees to a uniform data set and software specification. This will include an agreed definition of a player “session” and give each operator the capability to correctly identify the majority of sessions using these agreed definitions before December 2013.

4. Mandatory money based reminders – Academic research by Professor Mark Griffiths suggests that mandatory reminders are particularly important for players who might find it difficult to adhere to self-imposed limits. A mandatory reminder will inform all customers automatically should they have lost £250 (and every £250 thereafter). The alert will also appear behind the shop counter which could offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.

5. Mandatory time-based reminders – As the above academic research under 4 suggests that mandatory reminders are particularly important for players who might find it difficult to adhere to self-imposed limits this will also apply to time spent. According to Professor Mark Griffiths mandatory reminders after 60 minutes could provide players with a ‘time out’ period to reflect on whether they wish to continue gambling and could also inhibit a player from using gambling as a way to escape their problems. The ABB believes it is socially responsible to implement an earlier time reminder than has been advised and the machines will inform all customers automatically that they have been playing for 30 minutes (and every 30 minutes thereafter). The alert will also appear behind the shop counter which could offer opportunities for customer interaction. It is intended that this new technology will be installed in all member shops before March 2014.

Griffiths, Wood, Parke & Parke, 2006; Wood & Griffiths, 2007
6. **Session data on player cards** – Whilst card technology is not fully developed or universally available in LBOs ABB members who offer machine cards to customers are committed to promoting the schemes and making them more accessible. They will utilize the data as a tool for player protection, customer interaction and centralized monitoring. According to the above research clear data enables customers to see the monetary outcomes of their gambling and diminishes the cognitive heuristics they have when ignoring incurred losses. The card users will be able to request their session data which includes money won or lost and time spent on gaming machines. This measure will be available with members who offer card schemes before December 2013. Due to issues around session data the industry is currently unable to provide this facility to all customers. Following the initial establishment of a uniform data set and software specification (see point 3), requiring further technical development, ABB members will give all customers the voluntary option of accessing, on gaming machines, a time and win/loss summary for their current session before March 2014.

7. **Money loading** – It is generally accepted in the academic literature that repeated money loading can be a sign of a player developing or experiencing problems with their gambling. Whether cash is loaded into the Gaming Machine or a debit card is used at the counter (credit cards are not accepted), customers are forced to make individual decisions about each £20 denomination to be used as stakes. This means that customers are making a number of conscious decisions and have time to reflect before loading a particular amount. Shop staff will be trained to recognise the opportunity for customer interaction. This measure will be available before December 2013.

8. **Exception Reporting** – Unusual transactional data, cash-in, and gross win data will be centrally monitored. Analysis may then lead to customer interaction or further investigation as appropriate. This measure will supplement existing compliance processes and be available from October 2013.

9. **Cash machines in betting shops** – From October 2013 ABB members will not site ATMs that can be used from within a betting shop.

**CUSTOMER INFORMATION**

10. **“Responsible Gaming”** – The responsible gambling page will contain more prominent and clear messages on staying in control (e.g. “Bet with Your Head”) and will aim to improve customer understanding (e.g. “Just because there have been a series of losing spins does not mean this will be followed by a series of winning spins”). These measures will be available before January 2014.

11. **Customer Help Pages** – Customers will have easier access and clearer information on help pages to enable them to understand concepts such as ‘return to player’ (RTP), the effect of randomness on potential returns, and voluntary player controls. This measure will be available before January 2014.

12. **Increased Frequency of Responsible Gambling Messages** – Responsible Gambling messages will be clearly visible on machine receipts, machine screens, and within the betting shop. This measure will be available before January 2014.
13. **More Informative Leaflets in Gaming Machine Areas** – Leaflets will explain the tools available to a player to control their gambling, including voluntary player controls and self-exclusion. This measure will be available before March 2014. Leaflets will also publicise the Gamble Aware website and the National Gambling Helpline more prominently. This measure will be available by October 2013.

14. **Games Design** – Games designers will be encouraged to ensure that the nature of play, and odds relating to, their games are clearly explained and easily accessible to customers.

15. **Websites** – Operators with corporate websites will provide a click through to the Gamble Aware website for anyone who feels they may have a problem with their gambling.
CHAPTER 5

COMPLIANCE AND EVALUATION

Compliance with the code of conduct will be a mandatory condition of ABB membership from 1 September 2013. The measures contained in the code are based upon the evolving body of evidence from around the world as to what does, and does not, work in terms of harm minimisation. The ABB has been advised in this regard by Dr Mark Griffiths, who is Professor of Gambling Studies at Nottingham Trent University’s International Gaming Research Unit and has referenced the academic research in this area to support new measures contained in this code.

However, we acknowledge that harm minimisation, as opposed to harm identification and treatment, is a relatively new concept. There are different measures being trialled across the world and the body of evidence as to what are proven effective harm minimisation measures is constantly evolving. In Great Britain the upcoming research by RGT is highly significant and will hopefully add to our knowledge in the area of harm minimisation. We will recommend to the RGT that they evaluate the impact of the new machine measures as part of this research.

The ABB and its members are fully committed to both monitoring compliance to the code and to updating and strengthening the code as new evidence emerges over the coming months/years. The ABB will also formally evaluate the effectiveness of the code by establishing measurable KPI’s and other success indicators and monitoring performance against them on a regular basis.

The ABB will set up a new Responsible Gambling Committee which will meet at least quarterly and monitor and review both compliance with the code and the detail of the code itself, making new recommendations as necessary. The Committee will have an independent (non bookmaking) chairman and an independent adviser who is knowledgeable and respected in this area of gambling related harm. The panel will also include members with knowledge of gambling and harm prevention and will seek to tap into the expertise available within RGT, RGSB, Gamcare, Gordon Moody Association, The National Problem Gambling Clinic and the Gambling Commission. The panel will receive data reports from ABB members, including feedback from machine players on the effectiveness of the measures, and consider breaches of the code. The panel will agree a terms of reference and set measurable indicators before December 2013. Measures will be assessed six months after their implementation. The reviews will take place in March and September of each year.

The committee will also engage with a wide range of stakeholders in the area of gambling and gambling related harm. The ABB will provide secretariat support to the committee and it will report its findings to the council of the ABB, through the ABB Chairman who will attend committee meetings as required. The panel will propose sanctions to the ABB Council if members are in breach of the Code.

The ABB Responsible Gambling Committee will be operational by 1 January 2014 and will be responsible for reviewing and evaluating the impact of the enhanced player protection measures.
CHAPTER 6

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 the Chairman of the ABB:

Neil Goulden  
Chairman – Association of British Bookmakers  
25 Buckingham Palace Road  
London SW1W 0PP

E: neil@neilgouldenconsulting.com  
T: 02074342111

Once the ABB Responsible Gambling Committee is established contact points for its members will be published in the code.

The ABB code will be prominently displayed on its website and all ABB members will receive copies, and sign an agreement to comply with its provision. Hard copies of the code will be available on request from the ABB.
CHAPTER 7

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. Minimum industry standards are established under the provisions of the Gambling Act 2005 and the associated regulatory framework.

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.