

Customer interaction – guidance for remote gambling operators

Guidance note

1 Introduction

- 1.1 Customer interaction describes how you identify people who may be experiencing, or at risk of developing, problems with their gambling, and how you interact with them to offer help or support.

2 Summary

- 2.1 If you suspect a customer may be experiencing or at risk of developing problems with their gambling, you are required to interact with them to offer help and provide support.
- 2.2 This guidance sets out some of the issues around identifying potentially harmful behaviour in remote gambling. It talks about why it is important, makes our expectations clear, and suggests ways you could meet them. This includes some ways that remote gambling operators have told us they have found worked for them and their customers.
- 2.3 In our [corporate strategy](#) for 2018-21, we set out our expectation for operators to intervene to make play safe and to protect consumers who may be at risk of gambling-related harm. This includes people who, due to their current circumstances, may be more vulnerable to developing problems with their gambling. In order to raise standards, we are committed to helping businesses be compliant: to ensure standards are understood, to facilitate sharing of best practice, and to give guidance.
- 2.4 As the industry continues to trial and evaluate new approaches to protecting consumers who are at risk of harm, and as new research is published, we will update this guidance. We expect that to continue to raise standards in this area, we will need to change the [Licensing Conditions and Codes of Practice \(LCCP\)](#), and will use evidence of good practice to set these minimum standards.

How to use this guidance

- 2.5 You should use this guidance to look at your own policies and procedures, and think about whether they meet our expectations, or if you could do more.
- 2.6 In this note, we refer to people who may be experiencing, or at risk of developing, problems with their gambling as being “at-risk customers”. When we talk about “indicators of harm” or “harmful behaviour”, we mean behaviour or activity which could indicate that someone is experiencing, or at risk of developing, problems with their gambling.
- 2.7 Customer interaction does not mean customer service or marketing, or requests for information solely for anti-money laundering purposes, and this note does not cover your responsibilities around anti-money laundering. For more information on this, see our advice on [meeting your anti-money laundering responsibilities](#). However, because the signs of

harmful behaviour can look similar to fraudulent activity, you could use your ongoing due diligence and monitoring procedures to identify both harmful and/or fraudulent activity.

Your regulatory responsibilities

- 2.8** All gambling operators are required to put into effect policies and procedures for customer interaction where they have concerns that a customer's behaviour may indicate problem gambling, as set out in our [LCCP](#), Social Responsibility Code 3.4. Recent [public statements of lessons learnt](#) show that a number of operators have failed to meet this regulatory requirement.
- 2.9** These policies should describe how you identify customers who might be experiencing problems with their gambling, and interact to help them. When deciding whether to interact with a customer, you should take into account:
- what you know about the signs of harmful gambling
 - what you know about the customer.
- 2.10** We know that some of you are concerned about your responsibilities around consumer data protection, alongside gambling regulation. General Data Protection Regulation (GDPR) requirements do not stand in the way of using data responsibly to identify patterns of play and target interactions to protect customers. For more information, see our [advice on GDPR](#).

3 Identify

Identifying at-risk customers

- 3.1** You need to know:
- the indicators of harm relevant to online gambling
 - how to spot when those indicators should trigger an interaction.
- 3.2** You need to put together what you know about the customer, with the indicators of harm, to decide whether you need to interact. More information can mean better decisions.
- 3.3** Some indicators of harm, such as high staking behaviour, can look similar to VIP and high-value customer activity. Even if you think the customer can afford it, they may still be at-risk. Your regular contact with your VIPs means you have many opportunities to get to know them well.

What we expect you to do

- Use a range of indicators relevant to your business. Do not rely on financial indicators alone. You should use realistic trigger points for when usual becomes unusual, and remember that not every customer will trigger every indicator.
- Monitor customer activity, so that you can interact early, and quickly. Invest in systems and staff to manage your process effectively
- Make sure your process keeps pace with any increase in demand – through growth, mergers or other internal changes.
- Train your staff to know their roles and responsibilities, and be supported and able to act when they spot harmful behaviour. This includes your VIP teams.
- Your customers should not be at more risk because they gamble overnight or out of hours. You need to think about how you can protect these customers, and also new customers.

- We expect you to take social responsibility seriously for all customers, including VIPs, and not let commercial considerations override customer protection. This means your VIP customers get the same level of protection as your other customers.

Using the right indicators for your business

- 3.4** Change compared with previous gambling activity is a general trigger that you could use for customer interaction. Building up a profile of your customers can help you spot changes in their behaviour.
- 3.5** You should use a range of indicators. The [PWC remote gambling research](#) identified some account and play indicators, but they are not a definitive list. Your list could include:
- **Time and spend indicators:** amount and frequency of time and deposits, time of day, large losses.
 - **Account indicators:** cancelled withdrawals, failed deposits, multiple payment methods.
 - **Use of responsible gambling tools:** changing deposit limits, trying to stop reversing withdrawals, previous self-exclusions or previous customer interactions.
 - **Customer contact:** information or hints from customers, frequent complaints, requests for bonuses following losses, or signs of distress.
 - **Play indicators:** chasing losses, erratic betting patterns and product choice.
 - **A 'big win':** [research shows](#) high staking following a win could hide or even lead to harmful behaviour.
- 3.6** If you use global thresholds, these should be realistic. To put this into context, you could look at the [Office of National Statistics publications](#) on levels of household income, or assess what is 'normal' for most of your customers.
- 3.7** For new customers or higher risk groups you could use lower thresholds for interaction, or other tools such as compulsory deposit limits.

Spotting harmful behaviour

- 3.8** How you monitor activity depends on your business. For some very small operators, manual monitoring may work. Larger operators with more active customers will need comprehensive systems, which could include a mix of automated and manual processes. Options for spotting harmful behaviour include:
- in-play real time monitoring to identify harmful behaviour as it occurs
 - daily reports on activity
 - chat-room monitoring and moderation.
- 3.9** The right information can mean better and quicker decisions. You should aim to integrate your systems so that staff have a more complete picture of the customer's activity, and this includes records of previous customer interactions.
- 3.10** Unmonitored overnight gambling carries an increased risk. [Remote gambling research](#) found that the highest risk customers were much more likely to gamble overnight than non-problem gamblers. Some operators have full 24-hour dedicated responsible gambling monitoring and support, so that customers have the same level of protection overnight as during the day. Another option could be more training and extra responsibilities for customer service staff or chat hosts to provide that support.
- 3.11** Because VIP customers can also be at risk of harm, you should carry out a responsible gambling check when upgrading a customer to VIP status, and keep this under review. You can also use these opportunities to carry out checks for AML. This could also help you to support customers who have had major wins.

Questions to think about

- Are your indicators relevant to your products and customers?
- Do you rely too much on financial indicators like deposit levels or losses?
- How do you decide the right level of your thresholds? Do you set your thresholds based on the staff you have to manage the workload, or do you think about what is right for your customers?
- Do you take into account all relevant information, and act quickly?
- How could you assess the risk level of new customers? What can you find out about your customers? What protections could you put in place until you can find out enough about your customers?
- Can your monitoring process keep up with demand?
- Do you offer the same level of player protection for all your customers, no matter how long they have been a customer, what time of day they play, or whether they are VIPs?

4 Interact

- 4.1 When you are concerned that a customer may be at risk, acting early and quickly could help stop the harmful behaviour getting worse.
- 4.2 For some customers, making them aware of their behaviour may be enough to prompt them to change. Some customers will need more support or advice.
- 4.3 Your interactions should have an outcome. Knowing what impact your interaction had will help you support the customer and help to keep improving your approach.

What we expect you to do

- We expect you to be curious, and if you spot harmful behaviour, assume that the customer is at-risk until you know otherwise.
- Make all reasonable efforts to make contact and interact with a customer, find out whether they received your interaction, and what impact it had on behaviour.
- You should choose the type of interaction based on the extent of the potential harm – from automated responses to human contact – and adapt your messaging to try to get the best outcome.
- Think about what information you should give the customer, such as the type of behaviour they displayed or practical help or support where appropriate.

Using the right interactions for your customers

- 4.4 You can interact with your customers in a number of ways: email, telephone calls, live chat or pop-up messages. The best way could depend on the circumstances:
 - what you need to know from the customer, and what you already know about them
 - what information you want to give to the customer.
 - how urgent it is to make contact.
 - how many times you have already interacted with the customer.
 - the outcome you want to achieve.

- 4.5** A customer interaction has three parts:
- **Observation** – behaviour you have spotted or something the customer tells you
 - **Action** – contact to prompt the customer to think about their gambling, and an opportunity for you to offer information or support
 - **Outcome** – what you or the customer did next.

Tailoring messages for your customers

- 4.6** You may already target your marketing messages to different customers. You could also use insight about your customers, such as how the customer prefers to contact you, to decide the best way to interact with them about their gambling.
- 4.7** [Industry-led research](#) shows that messages that get customers to think and make their own decisions based on the information they are given can be more effective, than messages that seem to be 'nagging'. [Research](#) also shows that personalising feedback can also improve impact with customers. You should test different types of messaging to see what works best.

Offering help and support

- 4.8** You should suspend direct marketing to customers who show signs of harm, so that you are not encouraging them to keep gambling, until you are able to interact with them.
- 4.9** If you have difficulty making contact with a customer, you could suspend account access until you are able to interact with them.
- 4.10** A self-assessment questionnaire can help customers think about their own behaviour. Their shared responses, alongside their gambling behaviour, can help you work out the right kind of help and support to offer.
- 4.11** You might direct the customer to responsible gambling information, or suggest suitable gambling management tools to address the harmful behaviour. You might need to signpost them to sources of help and specialist support from organisations who deal with advice and treatment for problem gambling.
- 4.12** You may need to interact with some customers a number of times. Your records of previous interactions with the customer will help you decide how to provide the right help and support. In some cases, you may need to take action for the customer, such as setting limits or closing their account.

Questions to think about

- How do you decide the best way of interacting with a customer? Do you use different methods for different groups of customers?
- Do you tailor your method and message depending on the extent of the harm?
- Do you know if the customer received and acted on the information you gave?

5 Evaluate

- 5.1** Evaluation can help on two levels: did the customer interaction have a positive outcome for the customer, and does your overall approach work? The Responsible Gambling Strategy Board has published an [Evaluation Protocol](#) for the industry to use when designing evaluations.

- 5.2** To help you work out the best options for the customer, you need to know what impact your interaction has had on their behaviour. This includes whether the customer has understood the information or advice you gave.
- 5.3** Keeping your policies and procedures under review and up to date by taking into account research and industry best practice will help you to identify at-risk customers, and can help you target your resources where they are most needed. This can also reduce the risk of driving away customers who are not at risk of harm.
- 5.4** At the moment, we think that too few customers are being identified and interacted with. Our regulatory return data shows that in 2016 around 1% of remote customers received a customer interaction. The [Health Survey for 2015](#) shows that 24% of online slots, bingo and casino players, and 12% of sports bettors are either experiencing or at moderate risk of harm.

What we expect you to do

- You should review and try to understand the impact of your customer interactions, to help you work out whether your customers are getting the right help and support.
- You need to keep records of your customer interactions, including your interactions with VIP customers, and use these to help support individual customers and to help you keep improving.
- We expect you to evaluate your approach, use that to update your processes, and to share good practice internally and with the rest of the industry.

Understanding customer impact

- 5.5** Sometimes it is not clear what impact your interactions have had, so you should try to work out whether the customer interaction has changed the behaviour that prompted it.
- 5.6** Some ways to work out that impact include:
- Did the customer start using gambling management tools; independently or following your advice?
 - If you are tracking links from emails, did the customer click through to responsible gambling information?
 - Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction? Has the customer's risk profile improved?
 - You could also follow up and ask the customer whether they found the interaction helpful or not.

Evaluating your policy and procedures

- 5.7** You may already quality assure individual customer interactions by spot-checking chat records and emails. As well as checking that customers are getting the right support, this can also identify staff development needs and highlight good practice that you can share across your business and across the industry.
- 5.8** You could use the [NatCen statistics](#) from the health surveys on the numbers of problem and moderate risk gamblers to work out the percentage of your customers you should be interacting with. These percentages vary depending on the gambling activity, and make sure you use the figures for the percentage of gamblers, not the overall population.

- 5.9** The following measures could help to work out whether your approach is working well:
- gambling management tools – increased take up and more customers sticking within their limits
 - customer retention
 - reduction in complaints.

Questions to think about

- Do you know how many of your customers may be at risk of experiencing problems with their gambling?
- How do you know you are delivering the positive outcomes for your customers?
- How could you improve on your policy and procedures?
- How could you share your best practice with the industry?

6 Summary of research and information

[Gambling behaviour in Great Britain in 2015](#) (NatCen, 2017)

[Responsible Gambling: Collaborative Innovation](#) (Revealing Reality, 2017)

[Getting Grounded in Problematic Play](#) (Jonathan Parke and Adrian Parke, 2017)

[Remote Gambling Research](#) (PWC, 2017)

[RGSB Evaluation Protocol](#) (RGSB, 2016)

[Testing normative and self-appraisal feedback in an online slot-machine pop-up in a real-world setting](#) (Auer and Griffiths, 2015)

[Office for National Statistics household income data](#) (ONS, 2017)

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