

LAND-BASED GAME DESIGN CODE OF CONDUCT

Introduction

As part of its collective commitment to safer gambling, members of the British Amusement Catering Trades Association (bacta) together with representatives of the Betting and Gaming Council (BGC) and the Bingo Association (BA) have undertaken a review into the design of land-based gaming machines and games to ensure that safer gambling principles are fully incorporated into industry games.

The result of the review is this Land-based Game Design Code of Conduct which demonstrates the industry's commitment to embracing positive change to enhance player safety through responsible game design and is intended to sit alongside the existing Game Design Code of Conduct produced by the BGC and which was primarily aimed at online activities. As per the Brief set out by the Gambling Commission, this Code covers aspects of game design only. Any areas covered by platform functionality are considered to be outside the scope of this Code.

We intend for this Code to be a living document, evolving as the research base and understanding around game design continues to develop. It is intended that the first phase of the Code should come into effect 6 months after the Code has been ratified to allow games that are in development to absorb any changes.

Part of this long-term work will include some areas that we feel require more research, more data and/or more discussion. These, as they currently stand, are listed in the Phase 2 section of the Code and will be brought into effect in a timely manner as they are investigated and deemed to be appropriate to implement.

The Code also sets out key principles and commitments that can be adopted by the industry in the following areas:

Game Characteristics

Working with academics, regulators, consumers, individuals with lived experience of gambling related harm and other technical experts to identify and agree on features that are correlated to greater player risk.

Informed Player Choice

Empowering customers to play more safely through the provision of clearer information on product and game rules, including mathematical properties such as risk, the chances of winning and optimal strategies.

Governance and Continuous Improvements

Process for reviewing and updating any Code of Conduct, in addition to transparency, disclosure and independent evaluation.

This Code represents our members' continued commitment to those aims and to responsible and safer game design.

Principles

The principles below reflect best practice already being undertaken by many bacta, BGC and BA members both in game design and venue management. They aim to instil a minimum set of standards in the Industry's approach to responsible game design. Embedded within these principles is a commitment to transparency, player education, innovation and research with the overarching aim of enhancing player safety. These principles also set out how the Industry will seek to review and improve the Code over time as our research and understanding of game design evolves.

1. A dedicated committee comprising representatives from bacta, BGC and BA, focused on Industry Sustainable Product & Game Design comprised of experts from product, technology and game studios, will review and adapt this Code on an ongoing basis.
2. We will conduct industry research and follow an evidence-based approach to development. Where there is evidence to suggest that a feature is correlated to player risk of harm, the Industry will take action, within the bounds of reasonableness, to mitigate the risk.
3. We will collaborate with academics, regulators, consumers, individuals with lived experience of gambling-related harm and other experts to identify risk and best practice.
4. Where we develop innovative game features or elements, we will review them internally within our individual organisations and identify any safer gambling considerations, including the support of post-release evaluations which will be reviewed by the committee.
5. We will be transparent in the reporting of findings from any research, including external scrutiny of our methodology and data (without prejudice to any data protection or privacy agreements).
6. The industry will provide information to our partners and players which clearly explains how products work and encourage safer play. This includes ensuring that games are designed to be clear and transparent to players and do not mislead players about likelihood of winning or how they work.
7. Game operation and rules, including best strategies, must be clearly set out and readily accessible to the customers.
8. We will look to innovate and build new safer gambling products and features and improve the level of control offered to players in games whilst gambling, as well as bring a consistent approach to existing in-game tools across suppliers.
9. Games will be designed and tested robustly to ensure they operate according to these standards and provide players with fun and fair games that they can trust.
10. We will ensure our games do not target people under the age of 18.
11. We will formally review and republish these principles and specific proposals periodically, recognising that the research base and player requirements around sustainable content are continually developing. We expect these principles to be continuously improved.

Standards

The following Code Standards are split into two phases of delivery and apply to all new land-based slots products. For the avoidance of doubt, this includes all brand new Category A, B and C slots products, but does not include updates to existing content or games. Certain items may be impossible to implement effectively on some products. By way of an example, verbose dynamic messaging is not possible on analogue machines whose only dynamic communication medium is a 16 digit alpha-numeric display. However, where the items can reasonably be implemented, we are committed to doing so.

Phase 1

The following standards represent measures bacta, BGC and BA members have committed to having in place for new game releases after 01/10/2022.

1.1 TARGET PLAYER-BASE

Regardless of any game theme used, cash payout games are not designed to specifically appeal to children.

1.2 FORMAT OF HELP INFORMATION

Help information will be presented in broadly the same format across all suppliers with Win plans (descriptions of awards), compliance text (including RTPs) and "How to Play" coming first. Games will show all RTPs for all available stakes, if these differ, at the same time.

1.3 AVAILABILITY OF HELP INFORMATION

All help information will be viewable without depositing funds as is currently mandated, but now should also be made available at all times where the player has a decision to make that can change the outcome of the game.

1.4 RESTRICTIONS TO AUTOPLAY FUNCTIONALITY

In line with autoplay functionality currently being used by players as a method of controlling spend, on single meter (deposit meter only) games, any autoplays that remain to be played will be cancelled if a big win is achieved, however that win is delivered. Autoplay does not need to be cancelled after a bonus feature has been achieved unless a big win is awarded from that bonus. A big win is defined as a win that is at least 25 times the maximum stake allowed for that machine.

1.5 AWARDS BELOW THE STAKE SIZE

Total wins that are below or equal to the stake will be informative but not celebratory. Specifically:

- *The win amount will be displayed*
- *The win line is displayed long enough for player to understand the impact of the bet*
- *A brief sound can be used to make the player aware of the result (the return of funds to wallet)*

In contrast, total wins greater than the stake may be celebratory and allow the following elements:

- *The win amount can be displayed in a differentiating manner e.g., the win display could be in a text size that is greater and could utilise dynamic win animations, for example coin showers*
- *The win line can be displayed with additional animation permitted*
- *Celebratory sound effects can be used.*

1.6 GAME STRATEGY EXPLANATIONS

In addition to the existing requirements mandating that players should be informed if they can affect the RTP or volatility by adopting a best strategy, this strategy will now also be explained to them in the help information. Gamble features specifically will come with a statement (shown on the gamble screen or in the help information) along the lines of "THIS GAMBLE FEATURE WILL RETURN AN AVERAGE PAYOUT OF 100%. PLEASE NOTE THIS DOES NOT MEAN THAT EVERY PLAY OR SERIES OF PLAYS WILL RETURN THIS PERCENTAGE. GAMBLE WINS ARE REWARDED RANDOMLY AND THE RETURN TO ANY INDIVIDUAL PLAYER MAY BE LESS OR MORE THAN 100%."

Phase 2

In addition to our Phase 1 standards, bacta, BGC and BA members also intend to further investigate and discuss a range of additional measures over the forthcoming months as part of our Phase 2 commitments for land-based slots. These could include:

Game Labelling on multi-game machines
Visibility and Prominence of Safer Gambling Tools and Help
Slamstop and its perceived effects

Bacta, BGC & BA Membership - Adoption of the Code

By way of this committee, bacta, BGC and BA are committed to setting the highest industry standards.

Compliance with the Code will be undertaken by members in line with the timescales proposed, including where operators use non-bacta, non-BGC and non-BA game suppliers.