

Online games design and reverse withdrawals

Responses

February 2021

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1 Executive summary

- 1.1** During the summer we consulted on proposed changes to the design of online slots - specifically to make them safer for consumers. Alongside this consultation, we proposed restrictions on reverse withdrawals which would apply to all remote operators.
- 1.2** We know that the success of many technology companies, digital content creators and game designers depends on their ability to establish and maintain the engagement of their consumers on their website, mobile apps and – in premises – gaming machines.
- 1.3** We also know that speed of play, frequency of gambling opportunities, and other factors can increase the risk of addiction and harm. The changes outlined within this document will help to mitigate these risks for online slots players.
- 1.4** Online slots are one of the largest online gambling products by Gross Gambling Yield (GGY) - played by relatively few but with a high average spend. Structurally, these products have a number of features which can combine to significantly increase intensity of play and pose a relatively high risk. This is reflected in the associated problem and moderate-risk gambling rates and further details can be found in the “Gambling product” [section](#) of our National Risk Assessment.
- 1.5** At the time of the consultation, we were clear that proposals on the design of slots games and reverse withdrawals are just one step in reducing the risk of harm. It is an area which has seen technological innovation in terms of product design, and we expect operators to continually show an equal, and indeed greater, commitment to innovate in terms of consumer protection. The proposals in this consultation form part of a comprehensive package of work we are taking forward to make online gambling safer. The proposals related to:
- a suite of new controls aimed at reducing the potential for consumers to be harmed by their gambling on the most intensive products: online slots.
 - removing the ability of operators to reverse customer withdrawal requests.
- 1.6** It is our intention to proceed with most of the proposed changes as set out in the consultation document. Reflecting the responses received we have sought additional evidence before reaching a decision on some proposals and amended others.
- 1.7** We have set out our position on each proposal in the relevant section of this document and in addition a summary of the new Remote gambling and software technical standards (RTS) requirements can be seen in Annex 1.
- 1.8** The new requirements will form part of a revised RTS which will take effect on **31 October 2021**.

2 Introduction

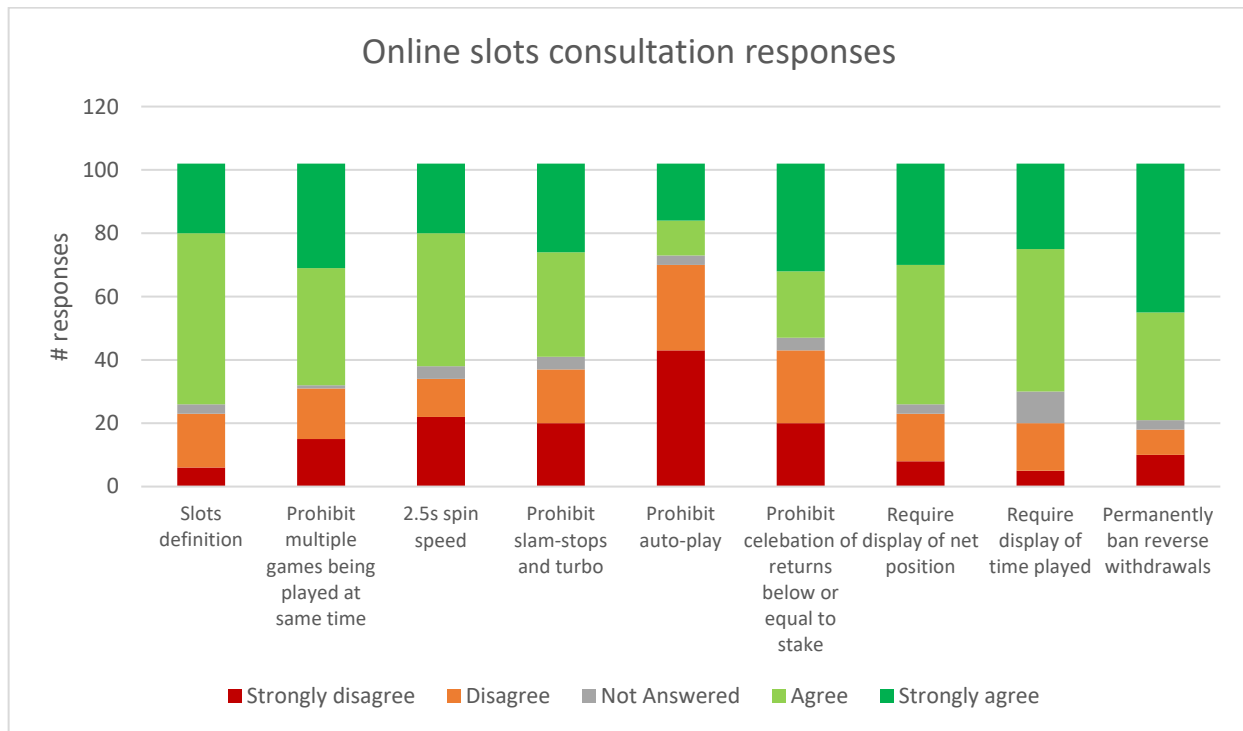
- 2.1** We license and regulate commercial gambling within Great Britain, including the National Lottery, with the exception of spread betting which is regulated by the Financial Conduct Authority (FCA).
- 2.2** Our functions include:
- licensing operators and individuals,
 - monitoring compliance with licence conditions and the law,
 - investigation and enforcement, both in relation to licensees and illegal (unlicensed) gambling, and
 - providing advice to central and local government on the incidence, manner, effects, and regulation of gambling.

- 2.3** We have a duty to aim to permit gambling if it is reasonably consistent with the statutory licensing objectives.

Consultation proposals and background

- 2.4** In [October 2019](#) the Commission brought together industry CEOs and laid the ground for trialling a more collaborative approach to improving player protections. During the event and through the various working groups that have taken place since, we challenged the industry to develop bold and effective methods to make online slots games safer for consumers.
- 2.5** An industry [code of conduct](#) has since been produced and went into effect at the end of September 2020. We think that the areas covered in the code will help to make online slots safer for consumers, but we do not consider the measures, by themselves, sufficient. Using industry and consumer data, gambling research and input from our Advisory Board on Safer Gambling, Digital Advisory Panel and interim Experts by Experience groups we identified several additional areas that could be implemented to make online slots safer.
- 2.6** The full set of proposed measures was set out in our 8 week [consultation](#), which closed on 3 September 2020. The consultation also proposed a ban on reverse withdrawals, a topic which was covered in the additional customer interaction guidance which was issued in [May 2020](#). The changes set out in this response will be incorporated within the Remote gambling and software technical standards (RTS), which sets out the specific technical standards that licensed remote gambling operators and gambling software operators need to meet.
- 2.7** Our aim is to take proportionate steps to reduce the intensity of online slots and we have been clear that the onus is on licensees to ensure their games are designed in a way which is consistent with delivering that aim. If we find that game developers are seeking ways to circumvent these controls, we will not hesitate to take further action.
- 2.8** We received 102 written responses to the consultation from the following categories of respondents, details of which can be seen in Annex 3:
- Members of the public - 46
 - Gambling operators - 39
 - Gambling industry trade bodies - 4
 - Charities - 1
 - Academics - 1
 - Other - 11
- 2.9** Section 3 provides a qualitative summary of the responses we received to the consultation questions, along with our position. Figure 1 provides a breakdown of responses to the consultation questions.

Figure 1



Approach to implementation dates

- 2.10** The changes to the RTS outlined in the relevant sections of this document will take effect on **31 October 2021**.
- 2.11** In assessing the most appropriate implementation date we considered the following:
- The number of games in-scope and levels of complexity of some of the required changes, including lead-time for development and change control processes
 - Operators of different size and capability have sufficient time to be compliant
 - Since we published the consultation there are some increased protections for online slots players because of the [BGC Code of conduct](#) which was launched in September 2020. Members of the BGC are now bound by this code, which includes limits on spin speed and a voluntary ban on features such as slam stops and turbo.
- 2.12** We welcome the commitments made by BGC members to make online slots games safer for consumers. However, we do not consider that as a package the measures proposed by industry are, by themselves, sufficient.
- 2.13** This consultation goes further in a number of additional areas to help protect slots players and will mandate requirements across all in-scope licensees, regardless of whether they are a BGC member or not. This means that where licensees fail to apply the new standards they can be subject to regulatory action.
- 2.14** It is our expectation that the additional lead-time will enable all operators to make their games compliant by the implementation date.

3 Summary of responses

3.1 The proposals in this consultation form part of a comprehensive package of work we are taking forward to make online gambling safer. We will continue to review the evidence base, evaluate the impacts of this work, and consider what further regulatory measures or advice to Government may be necessary. As part of this consultation, we sought views on our proposals to:

- Reduce the intensity of online slots
- Improve the information available to consumers that play slots
- Prohibit reverse withdrawals.

3.2 For each of the proposals we asked respondents to provide their views and related feedback or evidence. Operators were also asked to provide an indication of costs and time needed for implementation if a proposal was introduced. We have summarised responses to these questions under *respondent views* and provided our response in the 'our position' box.

Defining online slots within the Remote Technical Standards

3.3 There is not a separate licence type for remote slots as they are a casino product and caught under the Gambling Act 2005 (the Act) as gaming. Therefore, in order to increase controls on these products we proposed defining online slots within the [Remote Technical Standards](#).

Term: Slots

Definition: Casino games of a reel-based type (includes games that have non-traditional reels).

Consultation question

Q5. Is the wording of the slots definition sufficiently clear?

Respondents' views

3.4 The majority of respondents that answered the question (76%) agreed that the definition of slots was clear, including 25 operators. Several respondents commented that they agreed with the definition or found it sufficiently workable.

3.5 Some respondents raised concerns that the definition was vague, and further clarity was needed for terms such as *non-traditional reels*. It was mentioned that some gambling products have similar underlying mechanics to online slots but differed in terms of their overall presentation. It was therefore suggested that the definition draw a clearer distinction between game logic and user interface presentation. One operator suggested the definition was too specific.

3.6 Some respondents questioned whether game types other than slots were in scope of the definition, such as instant win games, video poker, virtual sports or video bingo. A small number of respondents asked for examples of game types that did or did not meet the definition of slots. One respondent stated that developers may need to seek confirmation from us on whether or not a product was in scope.

3.7 A concern was raised that different stakeholders (operators, test labs and the Commission) may have different interpretations of a product.

3.8 Suggestions for improving the definition included the addition of:

- 'grid based'
- awards prizes based on the outcomes displayed on the reels

- *result cannot be materially affected by customer interaction*
- *...but are based on the same combinatorial mechanics*
- *the outcome of such games is determined by RNG*
- *regulated under the Online Casino Games sections of the 2005 Act*
- *100% random and luck based*

- 3.9** One operator was concerned that developers may seek to circumvent any new regulations and another stated that developers would be incentivised to obscure the game logic.
- 3.10** A trade body suggested that online bingo operators offer slot games without reference to casino games and that the definition could be made clearer by including additional text that slots are caught as casino games under the Act.
- 3.11** It was further suggested that an additional definition should be considered to include National Lottery instant win games.

Our position

In order to increase controls on slots in the absence of a separate licence type, we proposed defining online slots within the Remote Technical Standards.

We are aiming for a definition that will be understood by developers, operators, test houses and which fits with our wider regulatory approach. That is why we proposed a high-level approach to the definition.

Our focus is on online slots, because of a particular concern about the accelerating intensity of these games being driven by technology and designs that aim to increase the time and spend of players. The definition is not seeking to bring into scope games that have some similar characteristics but are distinct from slots. Online slots are a remote casino product, so products which are caught by a different licence type, such as bingo, are not in scope of the definition. Other well-established games such as poker that have their own widely understood rules are not in scope of this definition.

Gambling operators are already required to determine whether the games they make available to consumers are slots for the purposes of correctly reporting financial data in their regulatory return submissions. Further, operators must ensure that the games they offer to consumers are sufficiently understood so that customers can make an informed decision before gambling. Our view is that the proposed definition should provide enough information to ensure games continue to be classified appropriately. We will monitor the implementation of the definition.

Based on our assessment of slots games and considering the feedback we have received throughout the consultation we expect that all slots games will be caught within the proposed definition. For any products where an operator is unsure, they should consult the supplier/developer of the product to ensure the product is consistently categorised across the industry. This should be no different from what currently happens, for operators to fulfil their existing obligations.

We note the suggestion to include text which makes clear that slots consumers cannot 'materially affect the outcome of the game'. Our view is that, introducing such text may require further explanation or guidance for the term *materially* and could mean that certain types of slots games (such as those featuring a skill based element) were not caught by the definition.

In general, we consider 'grid based' to fall under the definition of non-traditional reels. We cannot be definitive in every instance, especially as grid based is not defined and products will continue to develop.

One of most commonly suggested additions to this definition was 'awards prizes based on the outcomes displayed on the reels'. However, the addition would not serve a specific purpose (such

as moving a game into or out of scope) and would not appear to strengthen the definition while at the same time may increase the risk of circumvention.

The National Lottery is governed by a separate regulatory framework to the online casino sector and was therefore not in scope of this consultation.

This definition will come into force on **31 October 2021**.

New definition

Term: Slots

Definition: Casino games of a reel-based type (includes games that have non-traditional reels).

Prohibiting multiple slot games

- 3.12** Due to the risks of functionality deliberately designed to encourage consumers to play two slots games simultaneously, we proposed an update to RTS to require operators to ensure that consumers are only permitted to play one slot game at a time per account across multiple tabs/windows, browsers, applications (apps) or devices.

Consultation question

- Q6. Do you agree with the proposal to limit the number of slot games that can be played to one per account at a time?

Respondents' views

- 3.13** The majority of respondents that answered the question (69%) agreed with the proposal to limit the number of slot games that can be played to one per account at a time. This included 32 operators that agreed or strongly agreed with the proposal, with seven either disagreeing or strongly disagreeing. Operators overwhelmingly agreed with the aim of the proposal but there were some concerns with the wording.
- 3.14** Support from members of the public was more mixed with 26 responding positively and 19 disagreeing.
- 3.15** There were a number of concerns raised with the proposal which can be broadly grouped into the following areas:
- Technical challenges
 - Responsibility (customer facing operator vs game supplier)
 - Playing on multiple accounts
 - Innovation
 - Bonus wagering
- 3.16** Operators informed us they would be reliant on the customer facing operator (B2C) to implement this proposal as suppliers (B2Bs) only have visibility over their own games or platform. Suppliers are therefore unable to see if a consumer is playing on another supplier's game and as such do not have sufficient ability to prevent customers playing on games provided by other suppliers. Respondents felt we should be clear where the responsibility for compliance lies, although one game supplier informed us that they already prevented customers from loading multiple games that they supply.

- 3.17** While B2C operators broadly agreed with the aim of the proposal, they expressed concerns that to prevent multiple slot play in all cases across multiple devices would require a significant amount of development work as the functionality doesn't currently exist. An operator was concerned that the wording of the proposal could lead to a position where avoiding compliance breaches is out of their control. They also highlighted the potential for players to seek refunds if they were able to find a way to circumvent their controls. A trade body stated that the prevalence of playing on multiple slots was low and urged for, what it termed, a more proportionate approach.
- 3.18** The possibility for easy circumvention of the controls was raised by operators (and shared by other respondents), specifically that consumers could easily play on multiple accounts, which would negate the potential benefits of this proposal. As well as raising this risk, they highlighted that perversely the proposal might encourage consumers to switch between accounts or open additional accounts, resulting in increased deposits and lower visibility of consumer play for each individual operator.
- 3.19** Several operators asked how we would differentiate between games that featured multiple reels compared with the playing of multiple games. Operators mentioned that products featuring multiple reels were popular in other jurisdictions, an example was provided that featured four slots which could be configured individually, another mentioned Belgian skill slots. They were concerned that prohibiting such content would deter innovation.
- 3.20** An operator felt we should focus the requirement on the features that are deliberately designed to promote the ability to play multiple slots at once.
- 3.21** Some consumers told us that they may play on multiple slots when playing through bonus wagering requirements, either to reduce the variance or to reduce the time that would be otherwise required playing on a single game. There were concerns that as bonuses may have a time limit attached to requirements, they would be harder to complete. One consumer informed us that they would increase stake to compensate.
- 3.22** One respondent suggested that playing four games at once should be restricted but that preventing the concurrent play of two could increase the risk to the consumer if they chose to circumvent the restriction by playing on a second account. Another respondent echoed calls for the requirement to permit playing up to two games at the same time.

Our position

The reason for consulting on this proposal was due to the introduction of functionality deliberately designed to encourage play simultaneously via a split screen. Advice from our Advisory Board for Safer Gambling¹ indicated that *"this facility cannot be justified in the context of a reasonable approach to safer gambling and protecting players from suffering harm"*.

We will introduce a new requirement which prohibits operator-led functionality specifically designed to facilitate the playing of multiple slot games at the same time, which includes prohibiting split-screen or multi-screen functionality. We have amended the requirement and subsequent guidance accordingly to reflect this and provide further clarity.

We also proposed a requirement which went further than a prohibition of such features on individual websites to explore the feasibility of preventing multiple slot play across browsers/apps.

We have considered the responses to this proposal and acknowledge that the requirement to prevent multiple slots play across browsers or devices in all circumstances is likely to be technically challenging and are either easy to circumvent or could lead to unintended consequences.

¹ <https://www.gamblingcommission.gov.uk/PDF/Online-harms-advice.ABSG.pdf>

However, we are aware that some developers have implemented measures which would prevent more than one of their games being played by a consumer on the same operator's website and we welcome the initiative shown by an operator who informed us they were planning to implement measures to actively prevent multiple slots play in some cases.

Given the feedback on complexity, we tested these responses with our Digital Advisory Panel (DAP) who agree that implementing the proposal at an account/brand level would be complex and challenging and advised that mitigating the risk of play on multiple slots should be explored as part of the ongoing [Single Customer View](#) (SCV) project.

Structurally we expect that the prohibition on auto-play facility for slots games contained within this suite of measures will help to minimise the ability of players to gamble on multiple products, especially as each slots spin will now require individual user action to initiate the spin. This effectively stops the ability to set the reels spinning on auto-play and then switch to other forms of gambling while the reels are spinning.

While we are mindful of mandating a requirement which would be very complex to implement, we would be prepared to do so providing there are tangible benefits in terms of protecting consumers and where the proposed solution can mitigate against the risks of circumvention by consumers.

On balance, we agree that the proposed solution on stopping multiple slots games being played at the same time will at best only partially mitigate the risk identified, and without other suitable controls in place could potentially encourage other (riskier) behaviours. This may encourage some players to open additional accounts in order to circumvent the proposals.

We are alert to the unintended consequences of well-intentioned regulatory interventions and consider that such a risk exists with this proposal in the absence of a further developed SCV solution.

As such we will put this part of the requirement on hold until further progress is made with the SCV project.

We are, however, still concerned about the risks to consumers from intensive play across multiple slots games at the same time. We welcome the efforts from a handful of suppliers and operators who have already taken some action to stop consumers playing more than one of their games at once.

We recognise that operators may not currently be able to stop consumers from playing multiple slots games at the same time, but we are clear that operator led functionality specifically designed to encourage or allow customers to play multiple slot games at the same time is not consistent with our expectations of responsible product design.

A few existing games feature more than one set of reels within the individual game. Although we have seen limited evidence of such games in the GB market to date, it is possible such games increase the intensity of play and as such this is an area that we will keep under review.

Whilst there are some examples of good work in addressing this risk, we are concerned that some licensees may consider combining multiple separate slots into a single game or linking the wager of multiple slots to give the impression that it is a single game. We are adding guidance to make clear that developments aimed at circumventing the requirement are also prohibited.

We have taken action in the past on game features which are inconsistent with the aim of the RTS 14 and are prepared to do so in future. Licensees must take account of the aim of RTS 14² when designing new features or products.

² To ensure that products are designed responsibly and to minimise the likelihood that they exploit or encourage problem gambling behaviour.

This requirement will come into force on **31 October 2021**.

New requirement

RTS requirement 14C

The gambling system must not offer functionality which facilitates playing multiple slots games at the same time.

RTS implementation guidance 14C

- a) Operators are not permitted to offer functionality designed to allow players to play multiple slots at the same time. This includes, but is not limited to, split screen or multi-screen functionality.
- b) Combining multiple slots titles in a way which facilitates simultaneous play is not permitted.

Introducing speed of play limits

- 3.23** Currently, remote gambling is not subject to a minimum game cycle speed meaning there is a potential for faster, more intensive products to be available online than in other sectors or environments.
- 3.24** We proposed a minimum spin speed for online slots, which will mirror category B3 (mostly slots) gaming machines at a minimum of 2.5 seconds.

Consultation question

Q9. Do you agree with the proposal to introduce a minimum spin speed of 2.5 seconds for slots?

Respondents' views

- 3.25** 65% of respondents agreed with the proposal to introduce a minimum spin speed to online slots.
- 3.26** A number of responses stated that 2.5 seconds was insufficient, and a longer spin time should be considered. This included a response from academia that stated 2.5 seconds is insufficient for the emotional and physiological arousal outcomes of the previous bet to have subsided. Suggestions of 3 seconds and 5 seconds were offered. Several operators suggested a tiered approach where the spin speed was dependent on the stake size and was slower for higher stakes.
- 3.27** Consumers were split on the length of time for a game cycle. Some respondents raised concerns that the proposed speed limit could result in longer play (sessions), especially to complete bonus wagering requirements with some respondents suggesting it would spoil the player experience or that they may increase stakes to compensate. Others suggested that players may seek out unlicensed gambling opportunities.
- 3.28** There was concern that the wording of the proposed requirement appeared to prohibit auto-play as it made reference to the need to *release and depress the start button* and for players to commit to each game cycle individually. Along similar lines, some consumers told us that being required to take action to commence each game cycle would be annoying or inconvenient.
- 3.29** Several responses questioned the definition of 'game cycle' and offered opinions on how the start and end of one should be defined. These included:

- perhaps using international standards (such as those established by test labs)
- a game cycle is defined as “wager to wager”
- should be 'bet to result' time and shouldn't include wording around pressing of buttons/interacting with game.

Our position

After consideration of our position and the responses to the consultation, we will introduce a minimum game cycle speed of 2.5 seconds for online slots. We acknowledge the concerns expressed by some stakeholders that 2.5 seconds may not be long enough to introduce sufficient friction but it is important to consider the requirement as part of a wider package of measures designed to reduce the overall intensity of gameplay and protect consumers from harm.

The introduction of a minimum spin speed which mirrors B3 gaming machine content in the retail sector, should not be seen as an indication that 2.5 seconds is perceived as a ‘safe’ or ‘unsafe’ game cycle speed. It will create parity between the online slots and offline B3 machine spin speed (mostly slots). This will provide a baseline for evaluation and any future action.

The wording of the requirement has been updated slightly so it further aligns with game cycle definition in the machine technical standards. This definition is well established and understood by the industry.

A game cycle is initiated by player action such as depressing the start button and the next game cycle cannot be started until the previous one has been completed. The wording of the proposal was not an attempt to remove auto-play, as the consultation also contained a separate section for this feature. The inclusion is to mitigate one of the simpler circumvention methods.

Feature/bonus rounds which are awarded from the ‘base’ game are part of the same game cycle, providing no additional funds have been wagered. As the minimum spin speed is only applicable to slots, well known game elements such as splitting or doubling in blackjack are not relevant to this proposal.

Any game played with funds made available to a customer in lieu of stake, such as bonus funds, are treated as a game funded by a customer’s own funds and are subject to the minimum 2.5 seconds spin speed.

Implementing this proposal is a key part of our effort to reduce the risk of harm from online slots. The risk of consumers choosing to avoid the minimum spin speed by playing on illegal websites will be subject to close monitoring. Our approach is to continue to tackle unlicensed operators targeting British consumers alongside improving standards in the legal market.

This requirement will come into force on **31 October 2021**.

New requirement

RTS requirement 14D

It must be a minimum of 2.5 seconds from the time a game is started until the next game cycle can be commenced. It must always be necessary to release and then depress the 'start button' or take equivalent action to commence a game cycle.

RTS implementation guidance 14D

A game cycle starts when a player depresses the ‘start button’ or takes equivalent action to initiate the game and ends when all money or money’s worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game.

A player should commit to each game cycle individually, continued contact with a button, key or screen should not initiate a new game cycle.

Prohibiting player-led “spin stop” features

- 3.30** We consulted on prohibiting in-game features which contribute to greater intensity of gameplay by enabling consumers to:
- Deliberately speed up play, or
 - Provide consumers with an artificial illusion of control, or
 - Encourage dissociation from playing the game itself.

Consultation question

Q14. Do you agree with the proposal to prohibit features designed to deliberately speed up play, provide consumers with an artificial illusion of control, or encourage dissociation from playing the game itself?

Respondents’ views

- 3.31** 62% of respondents agreed with the proposal to prohibit the features listed in the consultation. This included broad support among operators with around three times as many responding positively than negatively. Other business stakeholders were slightly less in favour but still supportive and members of the public had mixed views.
- 3.32** A number of operators questioned why this proposal was necessary as the consultation also proposed to introduce a minimum game cycle speed of 2.5 seconds, with several suggesting features should be permitted providing the spin speed is adhered to.
- 3.33** Several respondents disagreed with the notion that features such as slam stop provided an artificial illusion of control stating that such features were designed to allow consumers to skip repeated animations. A response from academia was of the view that using slam stops may give a consumer the perception of some degree of control over the outcome of a spin, even though the feature has no impact on the probability of winning. A consumer responded that if the outcome was not changed by quick spin or a stop feature, they should be removed. Whilst another mentioned that they knew interacting with the game, by using one of the features, didn’t have an impact on the outcome.
- 3.34** There were several operators who were of the view that the proposal should not affect free spins or features within the game, as doing so would create a lengthy game cycle. Further, it was mentioned that allowing free spins to be accelerated would not conflict with the intention to mirror retail games. One consumer felt that players should be required to initiate each free spin awarded by a bonus.
- 3.35** It was mentioned by a couple of operators that the turbo mode may increase the speed that the reels spin at but not necessarily shorten the game cycle speed.
- 3.36** Several operators expressed concern that the proposal may impact other game elements such as bonus mechanics. A question was asked about whether this would impact ‘genuine skill stops’.

3.37 A number of BGC members informed us that they had committed to removing the features in-line with the BGC [game design code of conduct](#).

Our position

After consideration of our position and the responses to the consultation we will introduce the proposed requirement to prohibit features that speed up play or give the illusion of control such as turbo mode, quick spin and slam stop. This list is not intended to be exhaustive as we are aware operators may use alternative names for identical or similar features.

Implementing this requirement alongside the other requirements from this consultation will help reduce the intensity and potential for harm when playing online slot games.

This requirement applies to all slots regardless of the time taken to display the result or the overall game cycle speed. This is to ensure that games that take longer than 2.5 seconds to display the result, cannot be sped up by a customer who may get the erroneous impression that their interaction influenced the outcome.

We are taking this opportunity to clarify that allowing customers to skip animation after the result has been communicated is permissible. For the avoidance of doubt, features that allow customers to reduce the time until a result is shown will not be allowed after the implementation date. After the result is shown, a customer is permitted to skip animations if they wish to - although as per new requirement 14D, the next game cycle cannot be started until the 2.5 seconds have elapsed.

This proposal was not intended to remove any 'genuine' choice elements of game play such as picking which box to open, or the number of steps to progress in a feature/bonus round.

There are a wide variety of feature / bonus rounds across the large number of slots games in the market. Where rounds do not require any additional financial commitment from consumers and do not frequently occur (such as some bonus / feature games), the ability for consumers to interact is of lower concern from an intensity perspective and are therefore not in scope.

The aim of the policy is to reduce the intensity of online slots and the onus is on licensees to ensure their games are designed in a way which is consistent with delivering that aim. If it comes to our attention that game developers are seeking to exploit this, by significantly increasing the proportion of game considered to be 'in a feature' or in ways which increases the intensity and risk of slots titles, we will not hesitate to take further action in this area.

This requirement will come into force on **31 October 2021**.

RTS requirement 14E

The gambling system must not permit a customer to reduce the time until the result is presented.

RTS implementation guidance 14E

- a) Features such as turbo, quick spin and slam stop are not permitted. This is not intended to be an exhaustive list but to illustrate the types of features the requirement is referring to.
- b) This applies to all remote slots, regardless of game cycle speed.
- c) This requirement does not apply to bonus/feature games where an additional stake is not wagered.

Prohibiting auto-play functionality for online slots

- 3.38** Due to our evolving view of risk and research which cites auto-play as a potential contributing factor to gambling related harms, we proposed removing auto-play for online slots, which is the product most heavily associated with auto-play functionality. This research into the risks posed by auto-play was supported by feedback from our interim Experts by Experience (EbE) group and by data provided by GamCare from its online support forum for service users.

Consultation question

Q17. Do you agree with the proposal to prohibit auto-play on slots?

Respondents' views

- 3.39** Although the majority of respondents did not agree with the proposal to prohibit auto-play on online slots, 29% either agreed or strongly agreed. While operators were the least positive about the proposal with around 18% in favour, members of other organisations and individual respondents were also not supportive with negative response rates of 73% and 65% respectively.
- 3.40** Quite a few operators raised concerns about the evidential basis for prohibiting auto-play and mentioned that it was not clear how we had formed the proposal to ban it. Questions were asked about the correlation between auto-play usage and problematic behaviour. Similar views were expressed by trade bodies with the BGC mentioning that auto-play was one of the areas it has been looking into along with some of its members and that the industry are willing to share data with academics which could be used to assess the impact of auto-play on gambling related harms.
- 3.41** One operator indicated that they were concerned we were over-representing the views of those who had been harmed by their gambling, namely that we were giving too much prominence to the GamCare survey results and the feedback from our interim Experts by Experience group. In addition a number of operators and a trade body pointed to previous data shown to us by the (then) Remote Gambling Association, which they said showed that auto-play use did not correlate with gambling harms, and therefore in their view did not pose a disproportionate risk to players.
- 3.42** A number of operators and one individual suggested that reducing the maximum number of auto-play spins from 100 may be more appropriate than prohibition, with suggested limits ranging from 10 to 50. Other suggestions included limiting the maximum stake permitted using auto-play or limiting the total number of times auto-play could be used per session.
- 3.43** Operators, trade bodies and some members of the public suggested that auto-play could be used as a way to control gambling expenditure. This was because consumers may use auto-play to play a set number of spins which could be determined beforehand and that it was easier to stick to compared with individually committing to each spin and keeping track of how many they had played.
- 3.44** Operators expressed views that the current requirements in place for auto-play, such as requiring a customer to set a loss limit before commencing the gamble, provided consumers with a suitable amount of control and that they required a customer to think about the total financial commitment before using the feature. A number of operators felt that prohibiting auto-play and removing these additional controls could be counterproductive to the aims of the proposal. One respondent suggested updating the controls around auto-play to ensure they were the best versions, another suggested auto-play could be required to stop for wins over a certain amount.

- 3.45** Several operators stated that in light of the proposal to set the minimum game cycle duration to 2.5 seconds, the removal of the auto-play feature seems unnecessary. Further, several operators pointed out that auto-play does not necessarily speed up play. For instance, one operator referenced figures which indicated that the average game cycle was one minute slower per 50 spins when auto-play was in use.
- 3.46** A small number of respondents informed us that removing auto-play would be detrimental to the player experience, that being required to press a button each time would be exhausting or tedious, and that removing auto-play would be unfair on some of the customer base.
- 3.47** Several consumers raised concerns relating to disabilities or other physical conditions for whom access to play might be affected by the proposal to remove auto-play. Consumers also expressed concerns noted in other sections of the consultation about the impact this proposal would have on bonus playthrough.
- 3.48** A group of operators raised concerns that the proposal would make unlicensed gambling sites more appealing and the practice of using auto-play would become unregulated due to circumvention. A few respondents mentioned that auto-play was already prohibited in other jurisdictions, whilst one individual stated the current requirements on auto-play meant it was more heavily regulated than in some other countries. One respondent asked whether it was our intention to remove the auto-scratch functionality from other products such as scratch cards.

Additional research on auto-play

- 3.49** While analysing the consultation responses it became clear that our proposal was not supported by some respondents, partly because of the apparent popularity of auto-play for some consumers and partly because of the potential for unintended consequences caused by the:
- Removal of current pre-commitment features of autoplay. At present consumers using auto-play are required to set a loss / spin limit up to a maximum of 100 spins, with some responses highlighting the risks which may be associated with the removal of these pre-commitment tools.
 - Potential knock-on effects on how consumers play slots should auto-play be removed, with some respondents flagging the risk of faster play, longer sessions or some consumers increasing stakes/loss.
- 3.50** Given the breadth of views expressed we considered three additional strands of data collection and research to inform our response. This additional evidence covered different perspectives, including general slots players, as well as those who have been harmed by their gambling.

Target cohort	Aim	Vehicle	Type	# responses
Online slots players (consumer research)	Seek views on auto-play from online slots players, explore how it's used and whether it correlates to intensity of play and to potential harms	Online, with nationally representative sample	Primarily quantitative, with some qualitative content	358 online slots players / 190 auto-play users
Those who have played online slots and experienced harm from their gambling	Seek targeted view on what (if any) role auto-play featured in the harm they experienced	Survey hosted on GamCare service user forum	Primarily qualitative, with some quantitative content	33 service user forum responses
Operator transaction data	Explore the quantum of use of auto-play by online slots players (numbers of spins,	Data request to operators	Quantitative	2 x operator [business to

for auto-play users	sessions, accounts using auto-play etc.)			consumer] datasets 1 x supplier [business to business] research
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- 3.51** The response rates (190 from the consumer research and 33 from the GamCare survey) have been robust enough to help inform our position, especially as the consumer survey analysis has been derived from a nationally representative sample of 2,000 respondents.
- 3.52** The **consumer research**³ highlighted that auto-play has been used by 41% of online slots player respondents during the last 12 months (in addition 10% said they'd used it but >12 months ago) and that the feature was used most by the under 35 age cohort, where 51% had used auto-play during the last 12 months. This compares to 35% for those aged 35-54 and 24% past year use for those aged 55 and over.
- 3.53** In terms of frequency of use (past 12 months auto-play users only), the split was roughly equal (one-third each) between those who use auto-play more than half of the time, less than half of the time and very rarely. The under 35 age cohort were more likely than any other age cohort to use auto-play more than half of the time (37%).
- 3.54** Analysis of the responses reinforce the potential risks posed by auto-play for some users. 42% of respondents who use auto-play agreed that they lose track of their play whilst using auto-play, and almost one-third agreed that auto-play makes it difficult for them to stop gambling. This supports the academic research which points to the potential for dissociation for some players when using the feature.
- 3.55** Simultaneous play on multiple machines⁴ has been identified in the offline environment as a risk to players, as has online functionality "*which allows customers to play two online gambling products simultaneously via a split screen function*"⁵. In the context of these risks, the finding that 34% of respondents who had used auto-play agreed that they gamble on other activities at the same time as using auto-play (i.e. when the reels are spinning) does not seem compatible with an aim to keep players safe. While this may not happen during every session it still indicates a sizeable minority who are exposed to this risk.
- 3.56** The research findings support our concerns about the potential intensity impact of auto-play, where we sought to understand the relationship between auto-play and the three main dimensions of intensive slots play (time, spend and speed). The findings indicate that in the view of the respondents, auto-play correlates to a larger degree with increased speed of play, but still for a significant minority it also correlates with spending more money and spending more time on a game as a result of auto-play than originally intended.
- i. The majority (58%) of auto-play users agreed that auto-play had resulted in them playing a game faster than they had intended.
 - ii. Almost half (45%) agreed that auto-play had resulted in them spending more money than they had originally intended, and
 - iii. 38% agreed that auto-play had resulted in them spending more time on a game than they had intended.
- 3.57** While it is not possible to attribute causality in terms of auto-play and intensity of play, these findings imply that there is a strong relationship between them.
- 3.58** The consumer research indicated that for some players auto-play was used as a tool to mitigate some of the potential risks they faced. 45% of auto-play users agreed that it

³ 190 respondents who have used auto-play.

⁴ Machines Research Programme: Report 1 – Theoretical markers of harm for machine play in a bookmaker's. Wardle, Parke & Excell (2014).

⁵ <https://www.gamblingcommission.gov.uk/PDF/Online-harms-advice.ABSG.pdf>

helped them budget by setting a maximum they are prepared to lose and 35% agreed that auto-play helps them make sure they take a break in play.

- 3.59** As per some of the consultation responses, a sizeable proportion of respondents (34%) agreed that the feature increased their enjoyment of gambling.
- 3.60** A small number (around 7%) of respondents indicated that they felt using auto-play improved their chances of winning, despite it having no such impact.
- 3.61** The purpose of the research into the views of those **GamCare service users who have used auto-play and been harmed by their gambling** was to understand better the role that auto-play might have played in the issues they faced. The survey was shared through GamCare's publicly accessible online forum for one month and received 33 responses⁶. It found that the majority of this group (60%) felt that auto-play either contributed (45%) or was one of the main causes (15%) of the harms they experienced.
- 3.62** The majority of respondents agreed that "auto-play contributed to me gambling my allocated funds more quickly than I had planned" (67% agree), "I lost track of my play whilst using auto-play" (61% agree) and "Auto-play contributed to me spending more money than I intended" (55% agree).
- 3.63** Overall, two-thirds of the respondents felt that online slots would be made safer by a prohibition of auto-play.
- 3.64** The **data provided by two operators** appears to show that auto-play stakes tend to be on average at a slightly lower level than stakes for all slots spins - namely there is a higher prevalence of smaller stakes on auto-play. In addition, the average stake decreases as the proportion of auto-play use increases.
- 3.65** It also indicates that sessions involving auto-play tend to last longer and have a longer average spin cycle, in comparison to session data for all slots spins.
- 3.66** One operator's data indicates that auto-play use increases with age.
- 3.67** The **supplier research** presented to us based on data from a licensed operator, indicated that as the inferred risk score of players increased, the proportion of spins using auto-play decreased. It also showed non-linear relationship between auto-play usage and risk factors such as financial loss; as the proportion of spins using auto-play increased up to around 30% for an individual consumer, financial loss decreased, before levelling off and increasing once again past 40%.

Our position

After consideration of our original position, the responses to the consultation and further research, we will introduce the proposed requirement to prohibit auto-play for online slots.

We proposed removing auto-play due to the potential link to gambling related harms identified through academic research as well as feedback from our interim Experts by Experience (EbE) group and by data provided by GamCare from its online support forum for service users.

The consultation responses highlighted a broad spectrum of issues, including opposing views on whether auto-play is harmful or is used by some as a gambling management tool. It is possible that the different views are valid for different players or at different times for the same player particularly as it is clear that use of autoplay is not a niche activity.

⁶ While the forum is a safe and secure space for GamCare service users, the forum's accessibility means that anyone could complete the survey

Operator data shared with the Commission in 2019 was presented as evidence that auto-play is not a contributor to harms. This was not a view we shared as the data examined the relationship between auto-play use and a consumer's propensity to self-exclude⁷ from gambling - rather than correlating auto-play use against a significantly more robust measure such as PGSI.

We were keen to augment the existing academic evidence base by seeking the views from those who have been impacted by gambling related harm and we do not agree with the suggestion that in doing so we have disproportionately listened to one group at the expense of others. Our approach to understand whether these responses are indicative of a wider sentiment from consumers led us to seek the three stands of further, targeted evidence.

Our analysis of the **additional GamCare service user survey responses** showed that auto-play appeared to play a role in the harm experienced by the majority of this cohort.

The **additional consumer research** supports the findings of the academic work looking at auto-play and indicates that for a sizeable minority of auto-play users there appears to be a correlation with issues around intensity of play, as well as dissociation expressed through agreement that players lose track of play whilst using auto-play. It also highlights that for around one-third of respondents, the use of auto-play can make it difficult to stop gambling.

The finding that 34% agree that they gamble on other activities at the same time as auto-play is spinning reels is troubling. It adds weight to the argument that auto-play can be a contributor to gambling harms, at least for some players, some of the time.

This is a key finding in the context of player safety, especially as removing auto-play actively inserts friction and provides less opportunity for simultaneous play across multiple products. This is of particular importance given the introduction of a 2.5 second spin speed for slots which could be circumvented by using auto-play across multiple products.

The consultation responses, consumer research and GamCare research all provided evidence that consumers may use auto-play to facilitate the undertaking of other activities whilst gambling. Amongst them were extreme examples, such as hiding a mobile phone from family members which continued to auto-play. While such responses are not indicative of the wider usage of the feature, they highlight concerns about potentially harmful behaviour enabled by auto-play.

While we recognise the potential benefits afforded by the additional controls on auto-play required by RTS (around pre-commitment), and the fact that a number of respondents indicated that it encouraged them to take breaks in play; we note that auto-play does not provide the only opportunity for slots players to use these facilities or for operators to encourage or require players to use them.

On balance we do not assess that these mitigating factors sufficiently counter the potentially sizeable harms associated with auto-play.

The consultation has provided helpful evidence that for some players with particular health conditions auto-play can be an enabler of play. While we recognise our proposals can provide a challenge for those players, they are also likely to be exposed to the risks associated with auto-play identified previously.

The structural use of auto-play and its potential to facilitate play on multiple products at once does not seem compatible with the requirements for operators to keep players safe. It is therefore our decision to proceed with the prohibition of auto-play for online slots.

⁷ Research has shown that self-exclusion is not a satisfactory proxy for problem gambling or gambling related harm. See - Griffiths, M.D. & Auer, M. (2016). *Should voluntary self-exclusion by gamblers be used as a proxy measure for problem gambling?* Journal of Addiction Medicine and Therapy, 2(2), 00019

We will be vigilant where licensees seek to circumvent the intention of this prohibition and where necessary that will prompt further action.

This requirement will come into force on **31 October 2021**.

RTS requirement 8C

The gambling system must require a customer to commit to each game cycle individually. Providing auto-play for slots is not permitted.

Prohibiting effects that give the illusion of “false wins”

- 3.68** We proposed changes to ensure that returns equal to or below stake must not be celebrated in the same way as a “true win”. This is because we are concerned with the fairness of these celebratory effects, as we consider it important that consumers are empowered to use information about their play to make informed decisions.
- 3.69** We are also aware of the potential psychological effects of indicating wins more frequently than is actually the case, as this could induce a hot state which has been associated with gambling related harm.

Consultation question

Q20. Do you agree with the proposal to require returns below or equal to total stake, to have no sounds or visual effects that are associated with a win?

Respondents’ views

- 3.70** 61% of public respondents either agreed or strongly agreed that audio and visual events representative of a win above total stake should not be associated with wins below or equal to stake. A lower figure of 15 (32%) members of the public were not in favour of the proposal to restrict the celebratory aspects of a losing game cycle either disagreeing or strongly disagreeing with the proposal.
- 3.71** 22 operators disagreed or strongly disagreed with our proposal to restrict celebratory events for wins below and equal to total stake, whilst 17 operators were in favour of the introduction by either agreeing or strongly agreeing.
- 3.72** Multiple operators mentioned that games will need a significant amount of reworking including and not limited to redesign, development, internal and independent testing. Concerns were raised about delays due to test house demand. Several operators stated that all games may require third party test certification.
- 3.73** Seven operators estimated an implementation timeframe in excess of 12 months to make these changes. For operators that have an extensive suite of games, anticipated implementation time for games to adhere to the proposed requirement would be longer. Inclusion of back catalogued games will potentially increase the estimated turnaround times and it was noted from the responses that implementation time was difficult to predict due to uncertainty of the inclusion of back catalogue games.

- 3.74** An operator stated that additional staff will need to be hired to deliver this requirement as their roadmap is fully committed for 2021. The respondent pointed out that there is ongoing business to consider in addition to existing market commitments.
- 3.75** One respondent pointed out that for smaller suppliers this requirement could and will likely mean they are unable to bear the financial burden of operating in the UK market.
- 3.76** Various members of the BGC led game design working group suggested that we should introduce the celebratory restrictions within the [BGC game design code of conduct](#). Game code modifications will apply to returns below total stake, although the commitments exclude returns that are equal to the total stake value.
- 3.77** A small number of respondents raised concerns about accessibility. It was mentioned that 'audio prompts and large win text are mechanisms used to present information clearly'.
- 3.78** Several respondents stated clarity for the celebration level is required, examples such as font size for messaging and length of audio were raised. One operator mentioned that the 'nature of enforcing this requirement in their development as a slot supplier will be very subjective as the line between information and celebration is vague'.
- 3.79** A few respondents referred to a losses disguised as wins (LDW) as a sub-stake win. One operator mentioned that 'almost all slots in the market contain this kind of win, and without it, games would be extremely volatile, and extremely harmful to players'.

Our Position

After consideration of the responses, we will introduce the requirement as proposed in the consultation. This requirement will help to make games safer for players by helping increase their understanding of their play experience, particularly by balancing the following risks against the potential cost and complexity of implementation:

Fairness

We are concerned with the fairness of these celebratory effects, as we consider it important that consumers are empowered to use information about their play to make informed decisions. This includes whether the outcome was a true 'win' in the sense that it returned more than their 'total' stake and is a relevant consideration for all online slots players.

Potential impact on gambling behaviour

We are also aware of the potential psychological effects of indicating wins more frequently than is actually the case, as this could induce a hot state which has been associated with gambling related harm.

Several pieces of research have emphasised the psychological and physical changes that occur with consumer experience of losses disguised as wins.

The combination of these risks makes it important in our view to take this action, understanding that this could have sizable implication for some licensees. This requirement spans two licensing objectives and given the size of the risks we view this as proportionate to help make online slots games safer by design for consumers.

We did not consult on prohibiting slots games from returning amounts below (or equal to) stake, as seems to be the interpretation by some respondents. Instead the consultation was about limiting the celebratory effects to clearly distinguish a net losing spin from a net winning spin.

Whilst clarity has been sought about the type of audio and style of graphics, the requirement will remain high level and principles based. Extensive sound libraries and graphics that can be utilised within a game means we do not propose to be overly prescriptive, consistent with our wider

approach to regulation. That said we have enhanced the proposed guidance to include guidelines for reasonable steps to inform the customer of the result of their game cycle.

We have also updated the proposed guidance to remove the previous explicit reference to “win”, as we are content that the guidance at 14F(a) provides sufficient cover in this regard and is high-level enough to incorporate future innovation in this area.

Licensees must assess if the audio and visual events that are implemented within their games satisfy the requirement, however they also need to ensure that the outcome of a game cycle is transparent and can be sufficiently understood by a consumer (as per RTS 7E⁸).

Several operators suggested utilising celebration levels that the BGC led game design working groups have included in their code. Whilst we welcome the introduction of this code, our proposal goes further as it includes prohibition of celebrating a financial return which is of equal value to the amount staked. From a fair and open perspective, we want consumers to be able to understand the differences between a spin where they have made a net gain and others, including where they may be losing money.

We also noted requests to exclude all back-catalogue games and we have considered the views provided, including some of the challenges around implementation. We have concluded that if the requirement were to be applied to newly developed games only, a large proportion of slot games would still contain the celebratory aspects for returns below and equal to total stake and that the risk to consumers would not fully be addressed.

The requirement will therefore apply to all slot games regardless of release date. We have considered estimated timeframes which have been projected to re-design, re-develop and test games, although timescales were not provided by some respondents as clarity was being sought about historical game inclusion.

The new requirement comes into force on **31 October 2021**. Any games not compliant by this date must be removed from the market until such time as they are updated.

We have slightly updated the wording and expanded the guidance to provide clarity. The new requirement is:

Requirement 14F

The gambling system must not celebrate a return which is less than or equal to the total stake gambled.

RTS Implementation Guidance 14F

- a) By ‘celebrate’ we mean the use of auditory or visual effects that are associated with a win are not permitted for returns which are less than or equal to last total amount staked.
- b) The following items provide guidelines for reasonable steps to inform the customer of the result of their game cycle.
 - i. Display of total amount awarded.
 - ii. Winning lines displayed for a short period of time that will be considered sufficient to inform the customer of the result. This implementation should not override any of the display requirements (as set out in RTS 7E).
 - iii. Brief sound to indicate the result of the game and transfer to player balance. The sound should be distinguishable to that utilised with a win above total stake.

⁸ ... The result must be displayed for a length of time that may reasonably be expected to be sufficient for the customer to understand the result of the game or event in the context of their gamble.

Display of net position and time spent

- 3.80** We want consumers to be provided with more information upfront in order to make informed choices about their gambling. Whilst we recognise that there are a number of possible data points that may help consumers keep track of their play, expenditure and time spent gambling were identified as the most relevant in minimising the risk of gambling related harm.
- 3.81** In the consultation we therefore proposed to provide consumers with their net position and time spent during slots gaming sessions. Display of these two metrics will maximise the chances that consumers will better understand their play, whilst not 'crowding' the screen especially in light of the increasing amount of slots gambling done through restricted display devices (such as mobiles).

Consultation question

Q23. Do you agree with our proposal to require net position to be displayed at all times within a slots gaming session?

Q24. Do you agree with our proposal to require the elapsed time of slots gaming session to be displayed at all times?

Respondents' views

- 3.82** The majority of respondents agreed that both a net position and elapsed time should be displayed to slot consumers during their gaming session, stating that it would provide transparency and allow consumers to track and consider more easily their spend and time whilst playing. However, there were disagreements about how it should be implemented.
- 3.83** 76% for net position and 71% for elapsed time of all consumers responses agreed or strongly agreed that this was a common sense approach which would help all consumers whilst gambling.
- 3.84** A number of operators wanted clarification as to what we defined as a 'gaming session' as concerns were raised about consumers transferring between different games over short periods of time, losing connection and whether or not time should start when the game is opened or the first spin has started.
- 3.85** Six operators proposed instead that the gaming session should start from when a consumer first accessed the website or app and only finish once they have left. This would continue regardless of how many different games they accessed.
- 3.86** Six operators also questioned how displaying both sets of data on restricted display devices would be achievable considering the lack of space available. They argued that space is already filled with valuable information and by adding more you would be potentially creating confusion for consumers. They also suggested that it may result in struggling to deal with consumers checking balances and accessing other features at the same time as playing a game.
- 3.87** The idea that requiring this information to be permanently displayed to consumers would in the long run not be beneficial was also raised by a number operators who warned that 'it will eventually just be another piece of information that blends into the general game'.
- 3.88** One operator and a trade body took this further and wrote that if net position was displayed permanently with differing figures shown for other requirements it would actually have a

detrimental effect on consumers. With consumers being able to see if they are up or down on their starting position it may prompt them to chase losses gambling more, and gamble for longer, than initially intended. Information must therefore be presented in a meaningful, digestible way.

3.89 A couple of operators proposed that instead of the information being displayed within the game window it should be included as a pop-up or via an in-game hub, which is always accessible via an in-game menu or dedicated button.

3.90 The majority of games developers who responded wrote that any development that took place must be done on the website client side and not on the game client side. This was mainly because of the potential for net position and time to be tracked across multiple game sessions at a time and not within a single instance of a game. If we were to require this, it would have to be done on the website due to the amount of development needed for game clients and portals to talk with each other.

Our position

After consideration of our position and the responses to the consultation we will introduce the requirement to display net position and time with one minor update to the proposed text to enhance clarity. We have also removed one part of the proposed guidance as we are confident that the requirement provides sufficient clarity as per the updated draft.

We agree with the views of most respondents that requiring the information to be permanently displayed on the game screen will give consumers greater transparency along with further tools to monitor their spend and time.

Although many respondents asked for us to provide greater clarity to be included within the requirement, we consider the proposed drafting to be sufficient in terms of outlining the outcomes we expect to see. It would be neither appropriate nor practical to impose an overly descriptive and ultimately restrictive set of rules – especially around points such as a text size, placement etc.

It is important that the overall requirement will be kept high level and principles based allowing operator's greater freedom in implementing the rules in a way which balances the need to be clear for consumers and their own individual set-up and suite of games. We also agree with the respondents who indicated that it is important that these are presented in a meaningful, digestible way.

Noting the responses keen to see the display of the proposed metrics across all online gambling activity, we are only consulting in this section on changes to one of the most intensive products – online slots. It is therefore our intention to proceed as set out in the consultation. We have updated the display of time requirement to make it clear that the elapsed time should be displayed over one gaming session and not multiple sessions.

We have previously taken steps to ensure that operators provide information to consumers across their whole account such as net deposits and account history. These existing requirements at an account level will remain in place. We want to raise standards above this threshold for slots play to implement an additional safeguard.

We do not view the lack of space on restricted display devices as sufficient reason to not include net display and time on them. By ensuring that the wording of the requirement is high-level, operators will be able to design a process by which this information is always viewable along with other information already required in a way which suits their particular games.

This requirement will come into force on **31 October 2021**.

RTS requirement 2E

All gaming sessions must clearly display a customer's net position, in the currency of their account or product (e.g. pounds sterling, dollar, Euro) since the session started.

RTS Implementation guidance 2E

Net position is defined as the total of all winnings minus the sum of all losses since the start of the session

RTS Requirement 13C

The elapsed time should be displayed for the duration of the gaming session.

RTS Implementation guidance 13C

- a. Time displayed should begin either when the game is opened or once play commences.
- b. Elapsed time should be displayed in seconds, minutes and hours.

4 Evaluation of changes to slots games

- 4.1 There were a small number of responses who indicated that we should evaluate these changes. This reflects our intentions when it comes to evaluating the interventions contained in this document.

Our position

We have developed a theory of change model and once the new requirements are in place, we will measure their impact through consumer research, operational data on slots and compliance assessments.

In the short term we propose assessing the following headline metrics which will help understand changes in player behaviour, in addition to headline participation and GGY stats to inform context to these changes:

- The number and proportion of sessions which last >60 minutes
- The number and proportion of sessions which result in a sizeable loss to the player
- Changes in staking patterns

In the longer term we will assess changes to the proportion of online slots players considered as problem gamblers or in the moderate-risk category on the PGSI scale. The timeframes associated with this will be longer than the short-term metrics.

In terms of player feedback, we will explore assessing the impact by seeking the views of those negatively impacted by gambling as well as how the package of measures has impacted the experience of the majority of players who do not experience harm.

We are currently exploring the methods by which we will collect this data.

We consider the proposed RTS updates and guidance gives us a clearer basis to raise standards and we will monitor the effectiveness of the guidance through our ongoing compliance and enforcement work. If this approach fails to deliver the outcomes required, we will revisit the need to impose more prescriptive requirements for specific licensees or general requirements.

Please note that details of how we will evaluate the ban on reverse withdrawals is contained in the following section, as it applies to all remote operators and not just online slots games.

5. Prohibition of reverse withdrawals for all remote operators

Consultation question

Q28. Do you agree with our proposal to permanently ban reverse withdrawals for all consumers?

- 5.1** In the consultation, we proposed that the ability for players to ‘reverse withdrawals’ be prohibited for all remote operators. Reverse withdrawal is a function that allows consumers to change their mind about withdrawing funds from their gambling account by cancelling a withdrawal of part or all of their funds before the transfer to their bank or wallet is completed. We accompanied this with proposed implementation guidance that withdrawals should be as frictionless as possible.
- 5.2** Our proposal was based on evidence that shows that the reverse withdrawal function presents a risk to engaged and vulnerable gamblers, from research, evidence from our casework, and information provided by people with lived experience. The proposal followed the additional guidance issued to remote operators on 12 May 2020, which stated that operators should prevent reverse withdrawal options for consumers until further notice.

Respondents’ views

- 5.3** The majority of respondents agreed or strongly agreed with the proposal to ban reverse withdrawals. Some respondents agreed that there were risks associated with allowing reverse withdrawals but considered the risk was for consumers to manage, or that the risks should be managed by restricting the functionality rather than banning it.
- 5.4** One respondent commented that banning reverse withdrawals is disruptive for the consumer and results in more frequent transactions on customer bank statements, which in their view could affect the consumer when applying for credit. Some respondents noted that there may be increased payment processing fees for the operator as a result of the inability to reverse withdrawals.
- 5.5** Some respondents suggested that the guidance that operators should prevent reverse withdrawal options remain in place temporarily while the Commission conducts an evaluation of the impact on consumers and operators. This would then fully inform whether a permanent ban on reverse withdrawals was needed.
- 5.6** One respondent stated that in their view it was inappropriate to include the consultation on reverse withdrawals (which affects all remote gambling) alongside the game design consultation (which primarily related to the provision of online slots games).

Our position

Following the consultation, the new requirement RTS14B to ban reverse withdrawal functionality will proceed, as well as the implementation guidance that operators should make the process to withdraw funds as frictionless as possible.

We note the suggestions that further restrictions of reverse withdrawal functionality would be possible, rather than a ban, and that some of the relevant research also considered or pointed to these options. However, some of these options would require the consumer choosing the restrictions and, as the evidence (from research and people with lived experience) suggests the functionality impacts on the most vulnerable and engaged gamblers, who may be least likely to apply voluntary restrictions or to maintain that voluntary application.

Where the further restrictions would rely on the operator to identify and take action, we have seen no evidence of operators actively taking this step for individual consumers in spite of the fact that

use of reverse withdrawals has been widely recognised as an indicator of harm for many years. This would also risk inconsistent application of individual restrictions and the most vulnerable consumers slipping through the net.

We carefully considered respondent proposals that further evaluation of the impact of the guidance issued during lockdown should be conducted before proceeding with the new requirement. However, we consider that the evidence to date on the impact of reverse withdrawals on vulnerable and engaged gamblers is sufficient to take action as a requirement now. An inconsistent application of the guidance risks confusing customers and having a disproportionate impact on operators implementing the guidance properly.

This is also balanced against the relatively low benefits which the functionality brings to operators and some consumers. Since the guidance was issued that operators should prevent customers from reversing withdrawals, we have had positive feedback both as part of the consultation, and from some consumers that operators have streamlined the process of a customer withdrawing funds from their account, and that this has supported consumer choice and decision-making.

We have not identified significant unintended consequences on consumers of the guidance issued in May on reverse withdrawals. Although this feedback does not constitute a formal evaluation of the guidance, it does provide added weight to the value of the proposed ban, and on making it a requirement so that it is implemented effectively and consistently across the industry.

Some operators raised a concern that the removal of reverse withdrawals may lead to consumers conducting more deposits and withdrawals, and operators consequently incurring greater payment processing fees. However, no significant increases in payment processing costs as a result of implementing the guidance during the initial Covid-19 lockdown period was reported and most industry respondents did not share this concern in the consultation responses. In addition, for reverse withdrawals to take place, a delay in payment processing is required which has a negative impact on all consumers, including those that do not use the reverse withdrawal function.

Although the consultation on reverse withdrawals was conducted alongside the consultation on game design, we took care to ensure that both topics were listed in the title of the consultation, that we explained the proposals in the summary of the consultation, and that we drew attention to the consultation to trade associations and relevant parties. We are content that the consultation presented an appropriate opportunity for stakeholders to provide comments and input to the proposals.

This requirement will come into force on **31 October 2021**. In May 2020, the Commission issued additional customer interaction guidance to state that operators should prevent access to reverse withdrawals. This guidance to operators will remain in force until October 2021.

RTS requirement 14B

Consumers must not be given the option to cancel their withdrawal request.

RTS implementation guidance 14B

Once a customer has made a request to withdraw funds, they should not be given the option to deposit using these funds. Operators should make the process to withdraw funds as frictionless as possible.

6 Testing

- 6.1** The [Testing strategy](#) for compliance with remote gambling and software technical standards sets out our requirements for the timing and procedures for the testing of remote gambling products (games and software).
- 6.2** This sets out:
- what the Commission considers to be the types of testing required in order for it to be satisfied that the technical standards are being met
 - the circumstances in which independent third-party testing is required and who the Commission considers appropriate to carry out that testing
 - the procedures for testing.
- 6.3** This is issued in accordance with sections 89 and 97 of the Gambling Act 2005 and Condition 2.3 of the Commission's Licence Conditions and Codes of Practice (LCCP). The Act allows for the Commission to set technical standards and allows for administration of testing, whilst the LCCP requires relevant licensees to comply with the Commission's technical and testing requirements.
- 6.4** As a principle, operators must satisfy themselves that they are offering compliant games. Where they are not sure, any existing game will require independent retesting.
- 6.5** All new games published after the implementation date will need to be tested. Games which are not compliant by the commencement date will need to be removed until such time as they can be verified. Games that require retesting could be prioritised based on popularity to spread the demand for testing.
- 6.6** We will shortly be publishing an updated Testing Strategy to incorporate the new standards and changes made to the numbering of existing requirements. This will incorporate a number of other minor changes have been made to the document in order to bring it in line with accessibility requirements.

7 Annex 1

Summary of changes to Remote gambling and software technical standards and testing strategy.

Final wording of the new definition

Term: Slots

Definition: Casino games of a reel-based type (includes games that have non-traditional reels).

Final wording of new RTS requirement 2E Slots only

RTS requirement 2E

All gaming sessions must clearly display a customer's net position, in the currency of their account or product (e.g. pounds sterling, dollar, Euro) since the session started.

RTS Implementation guidance 2E

Net position is defined as the total of all winnings minus the sum of all losses since the start of the session.

Final wording of new RTS requirement 8C Slots only

RTS requirement 8C

The gambling system must require a customer to commit to each game cycle individually. Providing auto-play for slots is not permitted.

Final wording of new RTS requirement 13C Slots only

RTS Requirement 13C

The elapsed time should be displayed for the duration of the gaming session.

RTS Implementation guidance 13C

- a. Time displayed should begin either when the game is opened or once play commences.
- b. Elapsed time should be displayed in seconds, minutes and hours.

Final wording of new RTS requirement 14B All gambling

RTS requirement 14B

Consumers must not be given the option to cancel their withdrawal request.

RTS implementation guidance 14B

Once a customer has made a request to withdraw funds, they should not be given the option to deposit using these funds. Operators should make the process to withdraw funds as frictionless as possible.

**Final wording of new RTS requirement 14C
Slots only****RTS requirement 14C**

The gambling system must not offer functionality which facilitates playing multiple slots games at the same time.

RTS implementation guidance 14C

- a) Operators are not permitted to offer functionality designed to allow players to play multiple slots at the same time. This includes, but is not limited to, split screen or multi-screen functionality.
- b) Combining multiple slots titles in a way which facilitates simultaneous play is not permitted.

**Final wording of new RTS requirement 14D
Slots only****RTS requirement 14D**

It must be a minimum of 2.5 seconds from the time a game is started until the next game cycle can be commenced. It must always be necessary to release and then depress the 'start button' or take equivalent action to commence a game cycle.

RTS implementation guidance 14D

A game cycle starts when a player depresses the 'start button' or takes equivalent action to initiate the game and ends when all money or money's worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game.

A player should commit to each game cycle individually, continued contact with a button, key or screen should not initiate a new game cycle.

**Final wording of new RTS requirement 14E
Slots only**

RTS requirement 14E

The gambling system must not permit a customer to reduce the time until the result is presented.

RTS implementation guidance 14E

- a) Features such as turbo, quick spin and slam stop are not permitted. This is not intended to be an exhaustive list but to illustrate the types of features the requirement is referring to.
- b) This applies to all remote slots, regardless of game cycle speed.
- c) This requirement does not apply to bonus/feature games where an additional stake is not wagered.

**Final wording of new RTS requirement 14F
Slots only**

RTS Requirement 14F

The gambling system must not celebrate a return which is less than or equal to the total stake gambled.

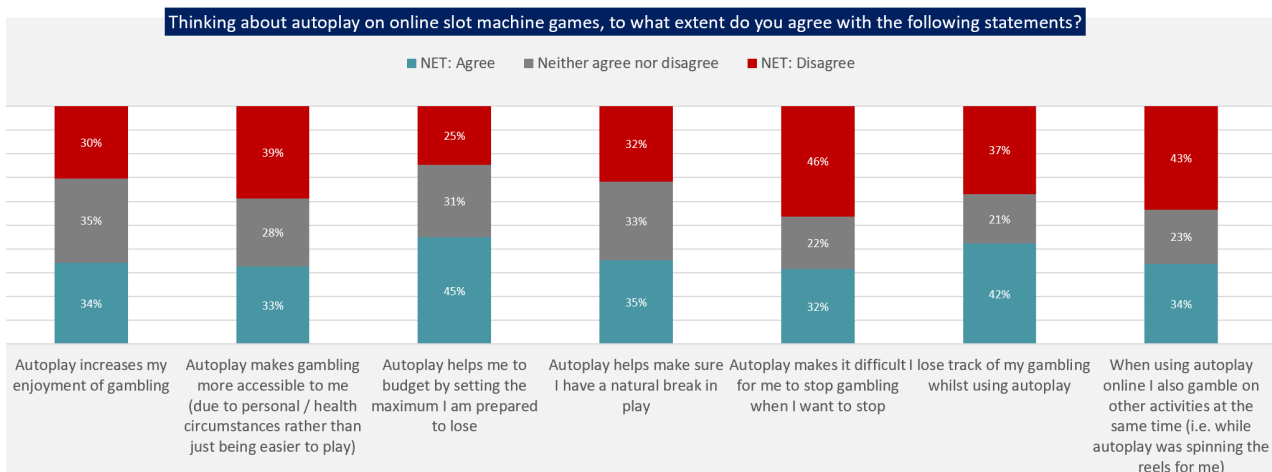
RTS Implementation Guidance 14F

- a) By 'celebrate' we mean the use of auditory or visual effects that are associated with a win are not permitted for returns which are less than or equal to last total amount staked.
- b) The following items provide guidelines for reasonable steps to inform the customer of the result of their game cycle.
 - i. Display of total amount awarded.
 - ii. Winning lines displayed for a short period of time that will be considered sufficient to inform the customer of the result. This implementation should not override any of the display requirements (as set out in RTS 7E).
 - iii. Brief sound to indicate the result of the game and transfer to player balance. The sound should be distinguishable to that utilised with a win above total stake.

8 Annex 2

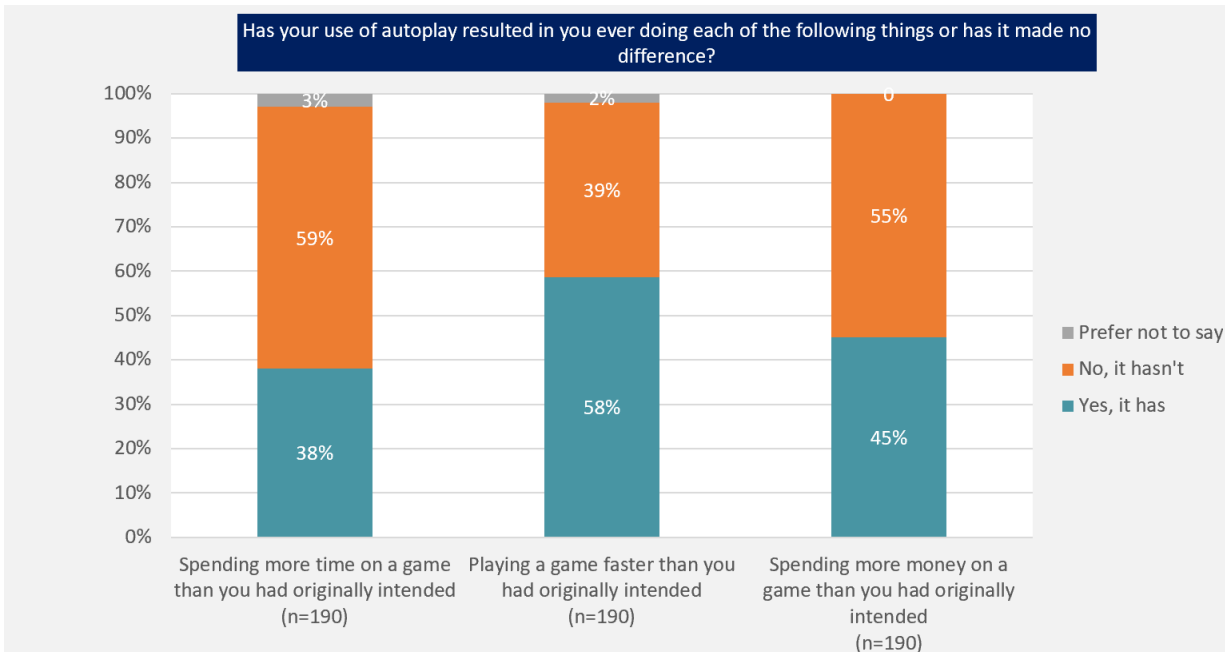
Summary of consumer research into auto-play

- 8.1** We inserted a number of questions on auto-play into December’s online tracker (a nationally representative online survey which typically gets 2,000 responses per quarter). Of these responses, 358 were online slots players and of those, 190 respondents indicated that they have used the auto-play feature.
- 8.2** The aim of this research was to test the views of consumers on auto-play, as well as their patterns of use and establish any self-reported correlation around areas of likely harm, dissociation and intensity of play.
- 8.3** This number of responses gives us a sizeable base of slots auto-play users on which to base our analysis and can assure us of a wider reach than the limited number of consultation responses from consumers. It should be stressed that we expect a large amount of read-across to highly engaged gamblers amongst the auto-play using cohort, which can be a driver for risks.
- 8.4** Claimed auto-play use is relatively frequent across a past 12 months timeline, with 41% of online slots players having claimed to have used the feature (an additional 10% claimed to use it >12 months ago).
- 8.5** Where used, it is often used frequently, as 34% of respondents who had used the feature in the last 12 months indicated they used auto-play on online slots more than half of the time.
- 8.6** An additional 33% indicate they use the feature less than half of the time and a similar percentage ‘rarely use’ auto-play.
- 8.7** Headline findings are shown in the following chart.



Sample size : 190 adults aged 18+ who have ever used auto-play on online slots

- 8.8** In addition, the following findings support our concerns about the potential intensity impact of auto-play, as we sought to understand the relationship between auto-play and the three main dimensions of intense play (time, spend and speed).



Sample size : 190 adults aged 18+ who have ever used autoplay on online slots

- 8.9** These findings imply that auto-play does have a strong relationship with intensity of play, albeit that we are not able to attribute causality between these factors.
- 8.10** Whilst there is undoubtedly some evidence of a correlation with gambling related harm for some, there are also findings which illustrate that for some auto-play increases their enjoyment and perhaps more importantly it is used by some as a budgeting tool or as a tool to provide breaks in play.
- 8.11** We are mindful that the removal of auto-play could therefore have an unintended consequence in terms of removing a budgeting tool for a number of players, we note that auto-play does not provide the only opportunity for slots players to use these facilities or for operators to encourage players to use them.

9 Annex 3 – list of consultation responses

9.1 Overall we received We received 102 written responses to the consultation from the following categories of respondents:

- Members of the public - 46
- Gambling operators - 39
- Gambling industry trade bodies - 4
- Charities - 1
- Academics - 1
- Other - 11

9.2 The following respondents indicated that they gave consent for their name to be included in a list of responses received.

Name	Organisation
Wayne Howe	Howe Gaming Limited
Tony Plaskow	Black Cow Technology
David McMorrow	Scottish Children's Lottery
Paul Caruana Turner	Nolimit City Limited
Ian Sims	Rightlander Ltd
Gregory Gomes	Member of the public
Paul Dolman-Darrall	Gamevy
Adam Avery	Angeltooth Ltd
Daniel Stephen Heames	Security
Razaq Suleman	Member of the public
Srikanth Balini	Gaming Associates Europe Ltd
Oliver Shackleton	Member of the public
Gordon George Donaldson	Member of the public
Matthew Brookes	Online Casino
Nathan	Nathan Coles Coaching
Victoria Taylor-Smith	White Ribbon Association
Adam Fisher	Member of the public
Mark Mealyea	Member of the public
David Clark	Member of the public
Sue Dawson	Ubud Ltd
Nicholas Martin	Martin Smoked BBQ Ltd
Chris Annett	Member of the public
Jan Vesely	Member of the public
Adam Mason	<u>Greentube</u>
Eddie Barrett	Lottogo.com
Richard Ingram	Inspired Gaming (UK)
Thomas O'Halleran	Blueprint Gaming Ltd
Mark Haynes	Sharp Gaming Ltd
James Marshall	<u>Push Gaming</u>
John White	bacta
Myron Cavalchini	Reel Time Gaming
Matt Zarb-Cousin	Clean Up Gambling
Nicole Garrett	Betting and Gaming Council
Craig Ferguson	Twitch Slot Streamer

Martin Paterson	Beathefix
Brian Wallace	Flutter
Sarah Wood	GVC Holdings PLC
Gambling Research Group	Bournemouth University
Peter Hannibal	The Gambling Business Group
Jemal Sudra	Member of the public
David Kerrigan	William Hill Group

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