



Growth through regulated
online gaming

Responsible Gaming Pillars

**A comprehensive guide to industry integrity and
best practices** in online gaming and betting



ABOUT IDEA GROWTH

The iDevelopment and Economic Association (iDEA) is a 501(c)(6) association which seeks to grow jobs and expand the online interactive gaming business in the United States through advocacy and education. We represent all sectors involved in the growing industry of internet gaming and entertainment, including operations, development, technology, marketing, payment processing and law.

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Executive Summary

Responsible gaming is a core value of iDEA and its member companies. To support our mission, we have developed a set of seven guiding principles – iDEA’s Responsible Gaming Pillars — that outline industry-wide best practices and performance standards.

These Pillars demonstrate our commitment to address critical gaming issues by educating consumers, supporting effective regulation, addressing problem gambling, preventing fraud, promoting sports-betting integrity and responsibility in advertising and marketing.

Pillar 1: We Promote Responsible Gaming

iDEA promotes responsible gaming practices by educating and providing resources for lawmakers, community stakeholders and the general public on the benefits of legal, regulated online gaming. Our member companies actively address responsible gaming issues as part of their daily operations, and we work collaboratively with our members, and other gaming industry stakeholders, to continuously advocate for high standards industry-wide. We advocate for gaming regulation that will preserve the integrity of the industry and have developed model legislation to serve as a guide for lawmakers seeking to implement online gaming as a mechanism for growing jobs, increasing revenues and protecting gaming consumers in their states.

Pillar 2: We Address Problem Gambling

Recognizing that there are potential behavioral risks associated with gaming, iDEA encourages operators to actively monitor player behaviors and provide assistance to those who display warning signs of problem gambling. While only a small percentage of players are problem gamblers, iDEA and its members strive to increase awareness and mitigate negative consequences for at-risk players by implementing preventative measures and maintaining a continuous commitment to research and education.

Pillar 3: We Work to Prevent Underage Gambling

We believe that preventing underage gambling is a shared responsibility. Our members work to build awareness and to provide resources to parents and caregivers on how to prevent access to gaming sites by minors (i.e., setting parental controls on computers and/or mobile devices). iDEA’s members also employ sophisticated age verification tools as part of the account registration process and continuously monitor aspects of play to flag suspicious accounts.



Pillar 4: We Work to Address Risks to Vulnerable Groups

Research shows that some populations are at higher risk for problem gambling than others. Identifying vulnerable groups is a complex issue, and our members are committed to continuous research on ways to identify problem behaviors and implement preventative measures and intervention strategies to address them.

Pillar 5: We Work to Keep Crime Out

iDEA member companies use state-of-the-art technologies to prevent fraud and criminal activity, confirm player identity and help consumers recognize safe and trusted online gaming sites. “Know Your Customer” (KYC) protocols are enlisted to verify identity, and protect player data, and geolocation technologies are used to confirm whether a user is where they claim to be. Our members collaborate with third-party technology providers that specialize in fraud protection, anti-money laundering and counter-terrorist financing, so that customers have confidence that personal and financial data is protected.

Pillar 6: We Support Sports Betting Integrity

As legal sports betting becomes increasingly popular across the United States, sports bettors are now moving away from illegal gambling sites to legal online sites that provide a safe and trusted gaming environment. iDEA and its members collaborate with sports leagues, colleges and governing bodies to continuously develop innovative technologies and monitoring tools aimed at protecting consumers and integrity in the sports betting industry.

Pillar 7: We Advocate for Responsible Advertising and Marketing Practices

iDEA members voluntarily adopt responsible advertising and marketing behaviors and remain committed to ensuring a culture of safe gambling to protect children and vulnerable groups. In practice, this means that our members are committed to conducting business in a fair and transparent way, particularly in relation to marketing, advertising and promotions.



Responsible Gaming

Responsible gaming is a core value of the members of iDEA. At the leading edge of promoting responsible gaming, our member companies actively address responsible gaming issues as part of their daily operations.

Education

Education is a key component of our commitment to responsible gaming. iDEA members collaborate with industry-wide players on best practices for responsible gaming, implement effective company policies, provide resources for players to prevent and treat problem gambling, and advise legislators on regulatory frameworks that will safeguard consumers and prevent fraud.

Effective Regulations

iDEA members advocate for gaming regulation that holds stakeholders to the highest standards of quality, and that ensures the integrity of the industry. Our members regularly meet with state legislators, head regulators and members of the executive branch, to advise on practical solutions for protecting consumers and to provide a roadmap to a successful legislative process for online gaming.

To that end, iDEA has developed model legislation to serve as a guide for state lawmakers looking to implement online gaming in their state as a way to grow jobs, boost state revenues and protect consumers.

Customer Tools to Prevent Problem Gambling

iDEA members provide consumers with tools and resources that allow them to identify risky behaviors and treat gambling problems should they arise.

Some of the tools our members implement include providing limits on the amount of money and time players can spend on gaming, and also providing players with the ability to set financial limits on their own accounts. In addition, players are given the option to self-exclude, not just from individual gaming sites, but also set blanket self-exclusion across all gaming sites within a specific jurisdiction.

In addition to these tools, iDEA members provide customers with resources that are prominently displayed on their sites should they exhibit risky behaviors or develop a problem gambling issue.



Fairness and Openness

iDEA members are committed to fairness and openness in business operations and customer relations. Providing consumers with the information they need to be informed, and complying with state mandated regulations and reporting requirements, our members strive to build transparent relationships with consumers of online gaming entertainment.

Our member companies provide rules, terms and conditions, and privacy policies that are easily accessible, and aim to outline the information in these documents in a way that consumers can understand.

Consumers have the right to file a complaint, and our members are committed to providing an accessible communication channel for customers and to handling any grievances in a fair and timely manner.

Our members spend considerable time and resources to help the small percentage of those who may not play responsibly and for whom the games are not intended.



Industry-wide Commitment

Responsible gaming is a collaborative effort, and iDEA members advocate for an industry-wide commitment to ensure a safe and enjoyable experience for consumers and to sustain the benefits the gaming industry provides to states. It is up to all stakeholders to implement best practices to keep responsible gaming and all other forms of consumer protection at the heart of all business activities.



Problem Gambling

iDEA members encourage operators to actively monitor player behaviors and provide assistance to those who display warning signs of problem gambling. While only a small percentage of players are problem gamblers, our members strive to increase awareness and mitigate negative consequences for at-risk players by implementing preventative measures and maintaining a continuous commitment to research and education.

Preventative Measures

iDEA members incorporate a variety of tools to help identify players who are potentially at risk and to get in front of any issues before problems arise. Data analytics provide valuable insight, and our members are committed to continuous assessment and innovation in accurately detecting risky behaviors in online gaming.

If it is determined that a player is at risk, educational resources and a variety of tools are made available to help players make informed decisions when participating in gambling as entertainment. Some strategies include:

- Stopping marketing messages to flagged players
- Sending reminders regarding the self-assessment tools available
- Providing instructions for players on how to set limits
- Providing phone numbers and other resources for problem gambling

“The power of technology to ensure responsible gaming online—and to quickly detect anomalous behaviors that indicate incipient problem gaming—is remarkable. We have honed the tools to identify issues as they arise, then we add the human communication and assistance to ensure play stays safe.”

Martin Lycka, SVP U.S. Regulatory Affairs and Responsible Gaming - Entain



“We develop our products and games with safer gambling in mind, and do our utmost to identify, assist and exclude those with gambling problems.”

Yaniv Schwartz, SVP Customer Risk Management - 888

Addressing Problem Gambling

It is the responsibility of everyone in the gaming industry to develop policies and procedures to address problem gambling. iDEA members strive to make information on self-help tools, telephone hotlines, educational resources and treatment centers readily available and prominently posted to help those that may be struggling with gambling addiction.

iDEA supports a collaborative environment for research and sharing of general knowledge and data, along with putting more emphasis on education so that problem gambling can be accurately spotted. Continuous research and refinement are key to accurately identify risky behaviors, incorporate effective preventative measures and successfully treat those with gambling issues.



Underage Gambling

iDEA members enlist policies and procedures to keep young people safe, while providing online gaming entertainment to those who are old enough to participate. Our members work to build awareness around underage gambling, incorporate age verification tools and procedures and provide resources to adults for preventing and treating underage gambling issues.

Age Verification

iDEA members enlist powerful technologies and operational measures to prevent access to gambling by those who are underage. For example, when patrons register for an online account or wish to deposit electronic funds, identity information is required and then verified by reputable third-party service providers; a common practice for online businesses.

Even after players are verified and given notice about the importance of account security, our members continue to monitor different aspects of play to determine if further investigation is required.



Sophisticated Know Your Customer (KYC) technologies focus on preventing underage gambling and fraud. KYC protocols are part of the regulations in all states in the U.S. where online gaming and sports betting are legal and regulated.





Building Awareness and Empowering Parents / Caregivers

Preventing underage gambling is everyone's collective duty. iDEA members are committed to building awareness of underage gambling by supporting and enforcing state mandated age requirements, implementing strict policies around underage gambling and providing resources for adults with minors in their care.

Underage gambling policies are prominently posted on gambling websites so that consumers are aware of the legal age requirements, and are also aware of the penalties should a minor be identified. Operators and affiliates are committed to compliance in training employees, and to working collaboratively with legislators to further prevent gambling by minors. Efforts are also made to ensure that underage persons do not directly receive marketing messaging, and that the imagery and wording used in advertisements for gambling products or games does not appeal to children.

iDEA members encourage parents and caregivers to monitor children's online activity and provide information on how to set parental controls on computers and mobile devices.

Additional resources on prevention, and identifying a potential issue, are also provided to consumers.



Vulnerable Groups

iDEA members acknowledge research that has identified certain populations that are at higher risk for problem gambling than others, and work to develop effective preventative measures and strategies for intervention.

Since it is not always obvious when such vulnerabilities exist, building a profile of customers, and training staff to know the signs, assists operators in identifying customers that present an increased risk.

Data shows that, for multiple reasons, some groups are at higher risk for problem gambling than others. Some of those include:

- **Young adults:** some research has shown that young adults are at an elevated level of risk, as they may be less familiar with commercial gambling products, more likely to have a lower level of income, or more inclined to act impulsively.
- **Mental illness:** individuals experiencing poor physical or mental health or physical or cognitive impairment, such as those suffering side effects from a brain injury or medication.
- **Socioeconomics:** individuals experiencing financial difficulties (inability to make essential payments, excessive borrowing), those that are homeless, are suffering from domestic or financial abuse, have caring responsibilities, are experiencing a life change (such as bereavement) or sudden change in circumstances (such as loss of employment, or conversely a significant windfall).
- **Existing addictive behaviors:** individuals who potentially suffer from another disorder (i.e. drug or alcohol abuse). Research has consistently shown that problem gamblers tend to have other comorbid disorders.

Our members are committed to continuous research on building awareness of customers who are potentially vulnerable, and therefore more susceptible to experiencing gambling harms.



Training

Education

Conscious Advertising

Our members also implement best practices and consider how best to manage the risk of problem gambling in vulnerable groups. Some of the actions our members take include the following (remember that vulnerability is a complex issue, and not every case requires the same action):

- Raising awareness of responsible gaming through targeted communications;
- Encouraging the customer to set limits on their gambling;
- Motivating the customer to take a break from gambling or provide tools to self-exclude;
- Enhancing monitoring of the customer's behavior (for example, it may be sensible for the operator to set risk thresholds at lower levels);
- Intervening directly, which sometimes includes the enforcement of limits or termination of the relationship;
- Including signposting to free, professional help and support resources (particularly when the operator has opted to terminate the relationship).



Keeping Crime Out

iDEA members understand that preventing fraud and criminal activity makes the online gaming space a safer place, and a more sustainable one too. Our member companies implement the latest tools and technologies to detect fraud, confirm identity and help educate consumers on how to identify safe and trusted online gaming sites.

Technology

Bad actors attempt to exploit online gaming websites and customers in order to enact fraud in a variety of ways. Our members utilize various technologies to confirm player identification. One of these is geolocation, which confirms to operators whether a user is where they claim to be. Another is a rigid identity verification onboarding process that is difficult for scammers to skip; one that includes device fingerprinting, email analysis and IP analysis, so fraudsters can't register multiple accounts with the same computer or mobile device, using the same email from the same location. Tools like KYC (Know Your Customer) protocols ensure that registered gamers are showing up in good faith.

With an abundance of third-party technology solutions, our members don't stop checking for fraud after the initial registration step. Our members collaborate with third-party solutions that specialize in this kind of fraud prevention, which means they can confidently tell customers that their data is protected. Additionally, operators have the ability to monitor player data and keep it confidential so that no one else can access it—including would-be identity fraudsters.

Know Your Customer (KYC) Protocols

iDEA members are committed to Know Your Customer (KYC) protocols. Users are accustomed to verifying their identity on any website that handles secure transactions, and our customers are not only aware that they benefit from these measures; they also expect them.

Our members often use third-party tools to keep customers safe and prevent fraud. Some of the most common data protection measures they use include:

- ID verification
- Age verification
- Cross-referencing with Voluntary Self-Exclusion watchlists
- Cross-referencing with deceased records

Most importantly, if there is any doubt, our members flag suspicious activity and investigate before transactions are cleared to proceed.



Anti-Money Laundering (AML) / Counter-Terrorist Financing (CTF)

Our members are committed to protecting consumer financial data and combatting cybercriminal activity by continuously tracking monetary transactions, executing KYC protocols and utilizing other data analytics. Our members enlist strict policies and procedures around anti-money laundering (AML) and counter-terrorist financing (CTF).



Prevention of cybercriminal activity involves an industry-wide commitment to education, knowledge-sharing and best practices. Our members have an obligation to ensure that their employees are properly trained on preventing fraudulent money transactions, and making sure that they are aware of what is expected of them within their roles. Educating staff and other stakeholders on the consequences of illegal activity is crucial in building an industry-wide culture that is committed to combatting online criminals.

Monetary tracking is a continuous process. Through the course of a player's entire experience on a gaming website, our members aim to keep them safe by looking for anything out of the ordinary. By collecting data tied to monetary transactions, behavioral anomalies and potential compromises can be more easily detected.

Identifying a Trusted Gaming Site

iDEA members know that gaming is first and foremost a customer service industry. Behind-the-scenes fraud prevention is important, but so are customer-facing methods to help users feel secure. iDEA members actively work with state legislators and regulators to educate the market about what indicates a safe, trusted gaming site and to flag offshore or untrusted sites before they can defraud players.

One of the most visible ways gaming sites can indicate trustworthiness is to prominently present credentials on their site. Like any other regulated market, legal participants in the online gaming industry have copyright, trademark and corporate information clearly visible to visitors. State regulatory bodies may also have credentialing requirements, and players should look for those.

Sports Betting Integrity

There are substantial illegal sports betting operations around the world that make players vulnerable and threaten the integrity of the game. The goal of our members is to move players to legal sites that provide a safe and trusted environment and encourage the integrity of the game.

Match-fixing and Spot-fixing

Match-fixing is an illegal activity whereby a result of a sports game, or even a virtual esports, would be manipulated. Spot-fixing relates to manipulation of an event within the game linked with a proposition bet. It is of crucial importance to educate stakeholders about what match-fixing and spot-fixing look like.

Our members in the sports betting space commit to having sports integrity policies and to training their employees to follow them. Integrity policies include a roadmap for reporting instances of sports manipulation, not only to their gambling regulator, but to leagues and colleges themselves. Our members also strive to collaborate with sports-governing bodies to mitigate the impact and prevent these instances from happening.

Legalized Sports Betting = Consumer Protections



age protections



| integrity of the game



| player exclusion





Integrity

Sports betting integrity is inextricably linked with the integrity of sports themselves. One of the key obligations of operators in that regard is to collaborate with sports leagues, colleges and others in this space. Our members use sports integrity monitoring tools and mechanisms that allow them to identify any instances or incidents, or events of match-fixing.

Our gaming operators are cautious of the way they portray gaming in marketing materials and advertisements. They avoid the portrayal of gambling as a lifestyle or a career, but rather show it as the pastime that it is.

Our ultimate goal is to make sure the general public can have trust in the games they watch, knowing that they are viewing fair play and not being hoodwinked by manipulation. Careful collaboration between operators and sports-governing bodies is key to holding stakeholders responsible and keeping manipulation out of sports.



Advertising and Marketing

iDEA members voluntarily adopt responsible advertising and marketing behaviors and remain committed to ensuring a culture of safe gambling to protect children and vulnerable groups. In practice, this means that our members are committed to conducting business in a fair and transparent way, particularly in relation to marketing, advertising and promotions. In order to continue to improve safeguarding, iDEA members cooperate to ensure that measures taken are agreed upon collectively within the industry to guarantee a safe and enjoyable gambling environment for everyone.

Compliance

Our members are committed to compliance with advertising codes and to ensuring that certain advertisements are not served to certain online browsing profiles; for example, advertisements or sponsorship links do not appear on website pages that are targeted to children.

As a result of global compliance and enforcement activity, standards are continuously improving, although some operators can do more to ensure that their marketing communications are transparent and socially responsible to avoid the risk of enforcement action for misleading marketing practices and potential financial penalties.



iDEA members use responsible advertising and marketing practices that protect U.S. consumers from false or misleading statements, provide clear terms and conditions, and do not entice vulnerable individuals.



Messaging

The advertising of gambling products and services should be undertaken in a socially responsible manner and must not mislead consumers. All rules, and terms and conditions which apply to marketing incentives, must be provided transparently and prominently and be made available for the full duration of the promotion.

Protecting children is a top priority. Our members are committed to preventing access to gambling by persons who are not of legal age, as well as working to prevent advertising from targeting minors. Marketing communications are crafted in a way that does not appeal to children or teens, particularly if they are generally available to be viewed by them. Efforts are made to ensure that underage persons do not directly receive marketing messaging, and operators are mindful of the imagery and wording used in advertisements for gambling products or games.

As part of this process, our members pay particular attention to advertisements that:

- Trivialize gambling (e.g. encourage repetitive or frequent participation);
- Refer, even indirectly, to indicators of problem gambling behavior (e.g. solitary play, playing late at night, pre-occupation with gambling, or isolating oneself from others);
- Refer to personal problems (e.g. that gambling can provide an escape);
- Seek to exploit financial concerns;
- Appear in media for those under legal age requirements;
- Appear in other media where minors are likely to comprise more than 25% of the audience;
- Are targeted at those who are known to be, or are likely to be, underage through the use of data such as that available on platforms like social networking sites, video sharing platforms and online display ad networks.

Placement

iDEA members are cognizant of ad placement, ensuring that digital advertisements are not displayed on websites providing unauthorized access to copyrighted content and do not knowingly engage in the distribution of unsolicited advertisements (i.e. SPAM), either directly or through a third-party. In doing so, our members take all reasonable steps to ensure that they are responsible for the actions of their third-party partners, including marketing affiliates.

Volume

Subject to the particular nuances of each jurisdiction, unless expressly permitted by law, consumers must not be contacted with direct electronic marketing without their informed and specific consent. If required, operators must be able to provide evidence which establishes that consent.

Whenever a consumer is contacted, the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn, as soon as practicable, our members ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again.



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