



Industry Voluntary Code on Customer Checks and Documentation Requests Based on Spend

The following voluntary code is designed to cover all aspects of social responsibility (SR) measures where, notwithstanding any other regulatory requirement, customer spend is the trigger for action. The purpose of this code is to provide a more consistent approach to SR compliance by operators which reduces the need for documents to be requested from customers. This voluntary code is one part of the broader set of protections operators deploy to identify and reduce risk of harm, as required by the Licence Conditions and Codes of Practice (LCCPs). This voluntary code will be accompanied by a separate voluntary code on AML in order to provide the same consistency across the sector in respect of anti-money laundering measures.

Nothing in this voluntary code replaces an operator's legal duties or the conditions of its operating licence (including the LCCPs).

- 1.** Operators shall deploy a range of actions between the threshold for financial vulnerability checks, the detail of which will be mandated in the LCCPs, and enhanced consideration (as set out in paragraph 3 below). A non-exhaustive list of examples of actions which could be undertaken includes: one-way notices and messaging; interactive questionnaires; surveys; PGSI surveys; telephone and live chat interactions; requests to set a deposit limit; and, sending an activity statement with acknowledgement required. These actions should not require documentation to be provided by the customer. Operators shall be free to select the action that best fits with their current tool kit of interactions and at the threshold optimised for the customer.
- 2.** If any customer wishes to have a net deposit of more than £5k in a rolling month (or equivalent), operators must undertake a risk assessment of that customer to: i) understand their financial situation (if not already known); and ii) assess whether that customer is displaying any indicators of harm. For 18-24 year-olds, this figure will be £2,500. If a risk assessment does not take place (for example, if a customer has not responded to a request for an interaction from an operator), the customer may not exceed such amount in the relevant month or any subsequent month. If a customer has a net deposit of £5k (or £2,500) each rolling month (or equivalent) for three consecutive months and the operator has not been able to complete a risk assessment on that customer, because (for example) the customer has not responded to the operator's request for an interaction, the operator must promptly undertake such risk assessment and restrict the customer until the assessment has been completed.

2a. The risk assessment must include one or more of the following (or similar approaches):

- i. A safer gambling interaction with the customer, including a self-declaration of the customer's income and/or wealth, via 2-way live chat or phone;
- ii. A review of the customer's affordability, including estimating their income and/or wealth (for example, by obtaining their occupation, industry, job title and annual salary, or their savings/investments/assets);
- iii. A review of open-source information on the customer, such as Companies House filings, public information on the customer's specific salary or wealth/assets, or previous winnings;
- iv. A review of relevant information obtained from the customer; and/or
- v. Financial insights, including an estimate of the customer's income and/or wealth, from a third-party whose business is subject to statutory regulation.

The above does not preclude operators finding additional alternative methods of satisfying these requirements or using multiple methods from the above to complete the risk assessment. Operators shall not be covered by this voluntary code if they seek to influence the customer's answers as part of the interaction.

2b. As a result of the risk assessment undertaken in accordance with 2a, an operator will need to take appropriate action where high risk activity is identified. Operators may need to escalate into enhanced consideration where comfort cannot be obtained using the information provided for the risk assessment.

3. When a customer has a net deposit of £25k in any rolling 12-month period, operators must promptly undertake a process of enhanced consideration (which may be similar to an operator's existing enhanced due diligence process). Customer winnings/net position can be used as part of that process. The voluntary code does not require operators to perform document checks at a gross deposit level.

Additional condition:

When determining if a customer has met the relevant threshold, the customer's overall net position can be considered over the previous 180 days.