

October 2009

LET 09/08

To casino trade bodies

Compliance inspections of casinos' social responsibility measures regarding access to gambling

This letter informs you about the findings of the Gambling Commission's inspection of a number of casinos. The inspection formed part of a programme designed to assess whether the operation of social responsibility measures such as self-exclusion and the prevention of access to those under age remain effective following the changes to Money Laundering Regulations (2007).

The Money Laundering Regulations (2007) permitted casinos to allow anyone, aged 18 and over, admission to a casino gaming floor without having to produce identification. This effectively removed the requirement for casinos to have full membership schemes for individuals wishing to gamble. The regulations require that once an individual player had staked more than €2,000 (Euros) within any 24 hour period, the casino must conduct appropriate customer due diligence. This is known as 'the threshold model'.

Many casinos saw the change as an opportunity to increase visitor numbers and were keen to implement the threshold model. A number have actively marketed the change. Given the relaxation in identifying customers as they entered the casino, some concerns have been raised that the introduction of the threshold model conflicts with some of the social responsibility requirements introduced under the Act, most notably the enforcement of self-exclusion agreements.

The Commission has undertaken a programme of compliance visits to assess how effectively casinos were in putting their self-exclusion policies and procedures into practice. A thematic compliance programme was established visiting around 1 in 6 casino premises across a cross-section of large, medium and small scale operators operating a variety of entry systems.

The Commission does not reveal the results of individual compliance inspections. However we can say that our visits found that the steps taken by operators to ensure compliance were generally positive. Operators demonstrated effective safeguards in maintaining sound procedures to identify self-excluded customers and those appearing under age, whilst introducing new policies and procedures for wider access controls.

Ensuring that social responsibility procedures remain fit for purpose and that gambling is conducted in line with those policies and procedures is a constant challenge for operators and as you would expect the programme identified some minor improvements for individual operators. However, the Commission found that overall casino operators had adapted well in ensuring their entry systems have developed without a detrimental impact on the required social responsibility measures.

Yours faithfully



Nick Tofiluk
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