

**Remote gambling and software  
technical standards**

August 2009

# Contents

<b>1. Introduction</b>	<b>3</b>
<b>2. Definition of terms</b>	<b>5</b>
<b>3. Remote gambling and software technical standards</b>	<b>6</b>
RTS 1 – Customer account information	6
RTS 2 – Displaying transactions	7
RTS 3 – Rules, game descriptions and the likelihood of winning	9
RTS 4 – Time-critical events	11
RTS 5 – Result determination	12
RTS 6 – Result determination for play-for-fun games	13
RTS 7 – Generation of random outcomes	14
RTS 8 – Auto-play functionality	17
RTS 9 – Skill and chance games with auto-play	18
RTS 10 – Interrupted gambling	19
RTS 11 – Limiting collusion/cheating	20
RTS 12 – Financial limits	21
RTS 13 – Time requirements	22
RTS 14 – Responsible product design	23
<b>4. Information provision annex</b>	<b>24</b>
IPA 1 – Customer account information	24
IPA 2 – Displaying transactions – third party user-interfaces	25
IPA 3 – In-running betting	26
IPA 4 – Use of automated gambling software	27
IPA 5 – Time-critical events	28
IPA 6 – Interrupted gambling	29
IPA 7 – Limiting collusion/cheating	30
<b>5. RTS - Security requirements</b>	<b>31</b>
Standard - A.5 Security policy	31
Standard - A.6 Organisation of information security	31
Standard - A.8 Human resources security	31
Standard - A.9 Physical and environmental security	31
Standard - A.10 Communications and operational management	31
Standard - A.11 Business requirement for access control	32
Standard - A.12 Correct processing in applications	33

# 1 Introduction

- 1.1** This document sets out remote and gambling software technical standards issued by the Gambling Commission (the Commission) under section 89 and section 97 of the Gambling Act 2005 (the Act).
- 1.2** This document replaces the *Remote gambling and software technical standards (RTS)* – June 2007.

## Review of RTS

- 1.3** The Commission has monitored RTS since they came into force on 1 September 2007. The Commission also carried out an initial review of RTS between October and December 2008 to determine whether there were any possible issues or changes that warranted a full consultation.
- 1.4** Feedback from stakeholders indicated that the RTS remain fit for purpose and there are no issues that required full consultation. The Commission published an information note on this in December 2008.

## Changes to RTS

- 1.5** This updated RTS document therefore does not include any changes to policy. However, the Commission has decided to publish an updated version to bring together other RTS requirements that were originally published separately.
- 1.6** This version now includes:
- a summary of the RTS security requirements that licence holders must meet (in chapter 5)
  - signposting to the relevant testing and audit requirements that licence holders must meet (below).

## Testing and audit requirements

- 1.7** The Commission's '*Testing strategy for compliance with the remote gambling and software technical standards*' (August 2009) sets out the Commission's current requirements for the timing and procedures for testing. Compliance with the RTS and testing strategy is a licence condition<sup>1</sup>.
- 1.8** Importantly it sets out the circumstances in which independent third party testing is required. The relevant standards are given in chapters 3 and 4 of this document.
- 1.9** The *Testing strategy for compliance with the remote gambling and software technical standards* also sets out the independent audit requirements that licence holders should fulfil. This is based on relevant sections of Annex A to ISO/IEC 27001: 2005 which are summarised in chapter 5 of this document.

## Application to remote bingo licences

- 1.10** The following standards do **not** apply to holders of remote bingo licences when making facilities available by means of remote communication in respect of games of bingo played on more than one set of premises:
- RTS 1
  - RTS 2
  - RTS 6

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<sup>1</sup> Condition 2 in Licence Conditions and Codes of Practice (LCCP), October 2008

- RTS 8
- RTS 9
- RTS 11
- RTS 12
- RTS 13
- RTS 14
- IPA 1-5
- IPA 7

### **Gambling software**

- 1.11** In the case of gambling software, these technical standards only apply to manufacture, supply, installation or adaptation of software for use in connection with remote gambling which takes place in reliance on an operating licence issued by the Commission.

## 2 Definition of terms

2.1 In this document the following terms have the following meanings:

Compensated games or events	Games or virtual events that adjust the likelihood of winning outcomes occurring based on previous payouts or intake. Sometimes referred to as adaptive behaviour or percentage compensation.
Game	A game of chance as defined in section 6(2) of the Act
Instant lottery	A lottery in which the draw takes place before any of the tickets in the lottery are offered for sale.
Mapping	Is the process of selecting an outcome using the result from a Random Number Generator (RNG). For example, the result from a RNG is mapped to a reel strip symbol.
Lottery	As described by section 14 of the Act.
Lottery ticket	As described by section 253 of the Act and a reference in this document to a lottery ticket includes: <ul style="list-style-type: none"> <li>• a lottery ticket which is sent by post following entry by means of remote communication</li> <li>• a message sent or displayed to a person electronically in a manner which enables him to <ol style="list-style-type: none"> <li>(a) retain the message electronically or</li> <li>(b) print it.</li> </ol> </li> </ul>
Non-commercial society	As described by section 19 of the Act.
Peer-to-peer gambling	A type of gambling where customers gamble against each other rather than against the house. For example, equal chance gaming such as poker or peer-to-peer betting through betting exchanges.
Progressive or progressive jackpot	An incremental prize that increases as a result of contributions from the monies staked within a game from pre-set base value.
Random Number Generator (RNG)	Refers to any item of hardware or software which is used to generate random numbers with the intended property of statistical randomness.
Restricted display device	A device such as a mobile phone or personal digital assistant which has limited space on which to display information, when used to access gambling facilities that the operator intends a customer to use by means of such a device.
Scaling	Scaling is the process used to convert the output from a RNG into the format required to produce a result for a particular gambling product. To illustrate, an RNG may produce a result of between 1 and 100,000 but these possible outcomes need to be scaled to the potential game outcomes of, for example, between 1 – 52 (ie to correspond to a standard pack of cards).
Seeding	Refers to the process used to determine the initial state of the RNG.
Subscription lottery	A series of lotteries (other than instant lotteries) promoted on behalf of the same non-commercial society or local authority in respect of which participants pay for participation in one or more future lotteries by regular subscription over a fixed or indefinite period.
Telephone gambling	Gambling which takes place via a telephone, without the use of visual displays, by interaction with a customer service agent or an automated system, such as intelligent voice recognition systems or touch tone.
Virtual	As described by s353(3) of the Act. Virtual event and virtual game are to be construed accordingly.

### 3 Remote gambling and software technical standards (RTS)

#### RTS 1 – Customer account information

##### All gambling – except subscription lotteries

###### RTS aim 1

To provide customers with easily accessible information about their current balances.

###### RTS requirement 1A

Where customers hold a credit or debit balance, the pages or screens used to move money into and out of accounts or products must be designed to display the customer's current account or product balance, either in the currency of their account or the currency of the gambling product (e.g. dollars, euros or pounds sterling), whenever that customer is logged in.

For telephone betting this information is to be delivered at the customer's request by the customer service agent or automated response system.

###### RTS implementation guidance 1A

a. Where funds are moved between products (for example, from a betting product to a gaming product) the balance does not necessarily have to represent all of the balances that a customer may hold with an operator in respect of those products.

###### RTS requirement 1B

Where customers hold a credit or debit balance, the pages or screens used for gambling must be designed to display the customer's current account or product balance, or where this is not practical to display a link to a page or screen that shows the balance, whenever that customer is logged in. Balances are to be presented either in the currency of the customer's account or the currency of the gambling product (e.g. dollars, euros or pounds sterling).

For telephone betting this information is to be delivered at the customer's request by the customer service agent or automated response system.

###### RTS implementation guidance 1B

a. Where funds are moved between products, the balance does not necessarily have to represent all of the balances that a customer may hold with an operator in respect of other products.

b. Gambling pages and screens include virtual game pages, sports betting coupons, and poker and other virtual gaming 'tables'.

## RTS 2 – Displaying transactions

### All gambling

#### RTS aim 2

To enable the customer to understand the value and content of their transactions.

#### RTS requirement 2A

The remote gambling system must be designed to make available clear information about the amount of money being gambled by the customer, including any conversions from one form of currency to another, or from currency to credits, chips or other tokens etc, at the point of conversion.

For telephone gambling, this information is to be delivered by the customer service agent or automated response system.

#### RTS implementation guidance 2A

- a. It is preferable for the amount being gambled to be displayed either in the currency of the customer's account or in the currency of the product. The use of credits, chips or other tokens with no face value should be avoided wherever possible.
- b. Any conversion from one currency to another should be clearly presented to the customer and any conversion rules are also to be presented. Where currency is converted into tokens, chips or credits, etc, the conversion should be clearly displayed.
- c. Information about the value of the gamble should be displayed including, as appropriate:
  - i. unit stake and total stake, whether currency, credit, tokens, chips, or any other form of payment
  - ii. entry fees, for example, payment for entry to poker tournaments
  - iii. the price of lottery tickets and the number of draws entered.
- d. For subscription lotteries, sending a confirmation by email or post and/or displaying the stake and the number of draws entered when the customer subscribes is sufficient.

#### RTS requirement 2B

The gambling system must be designed to display sufficient relevant information about the customer's gamble so that the content of the gamble is clear. This information must be made available before the customer commits to the gamble including, for example, in the artwork and textual information displayed during gaming, or on an electronic equivalent of a betting slip or lottery ticket.

For telephone betting, this information is to be delivered by the customer service agent or automated response system.

#### RTS implementation guidance 2B

- a. The following items provide guidelines about the type of information that may be relevant:
  - i. selections – the items the customer has chosen to gamble on;
  - ii. the bet type
  - iii. the accepted odds, for example current odds, starting price, first show, etc.

These items, where relevant, are required on applications designed for use on restricted display devices.

- b. For telephone gambling the content of the customer's bet should be read back to them before the bet is confirmed.
- c. Where the customer is able to choose, through the use of a third party user-interface, to override the display of this information, this must not be the default option. That is, the customer

must make an active choice not to have the information available or to install a user-interface that does not contain the information. The remote gambling system should continue to make available or send the information to the customer; it should not assume that the information is not required.

d. For subscription lotteries, sending a confirmation by email or post and/or displaying the first draw and the number of draws for which the customer will be entered is sufficient.

## RTS 3 – Rules, game descriptions and the likelihood of winning

### Gaming (including bingo), lotteries and betting on virtual events

#### RTS aim 3

To enable customers to make informed decisions about whether to gamble based on their chances of winning, the way the game, lottery or event works, the prizes or payouts on offer and the current state of multi-state games or events.

#### RTS requirement 3A

An explanation of the applicable rules must be easily available to the customer before they commit to gamble. The content including artwork and text must be accurate, and sufficient to explain all of the applicable rules and how to participate. All reasonable steps must be taken to ensure that the content is understandable.

#### RTS implementation guidance 3A

a. Explanatory content includes information in artwork and text displayed within the virtual event, in 'help' or 'how to play' pages, or other supporting material.

b. Links to the information should be prominently placed, for example on home pages for gaming sections, game selection pages or menus, or within individual games, so that customers can easily locate them.

c. As a minimum, restricted display devices should provide explanatory content via a menu item or other link.

d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:

- i. the name of the game, lottery or virtual event
- ii. the applicable rules, including clear descriptions of what constitutes a winning outcome
- iii. restrictions on play or betting, such as any play duration limits, maximum wins, etc
- iv. the number of decks or frequency of shuffles in virtual card games
- v. whether there are contributions to jackpots (progressives) and the way in which the jackpot operates, for example, whether the jackpot is won by achieving a particular outcome
- vi. instructions on how to interact with the game
- vii. rules pertaining to metamorphosis of games, for example, the number and type of tokens that need to be collected in order to qualify for a feature or bonus round and the rules and behaviour of the bonus round
- viii. the rules for entering a single lottery draw or a series of lottery draws and the frequency of the draws.

#### RTS requirement 3B

Where relevant, as the game or event progresses, information that may reasonably be expected to enable the customer to understand the current state must be displayed.

#### RTS implementation guidance 3B

The following items provide guidelines on the type of information that may be relevant.

a. Where a game builds up a collection of tokens (symbols etc), the current number collected.

b. An indication of which rules are currently relevant, such as displaying 'bonus round' or other feature labels.

c. This requirement does not apply to lotteries.

#### RTS requirement 3C

For each virtual event, game (including bingo), or lottery, information that may reasonably be expected to enable the customer to make an informed decision about his or her chances of winning must be easily available before the customer commits to gamble. Information must include:

- i. a description of the way the game works and the way in which winners are determined and prizes allocated
- ii. house edge (or margin)
- iii. the return to player (RTP) percentage
- iv. the probability (likelihood) of winning events occurring.

### **RTS implementation guidance 3C**

a. The following items provide further guidance on acceptable types of information about the likelihood of winning:

- i. for types of peer-to-peer games where the likelihood of winning may depend on skill and/or the actions of other participants, a description of the way the game works and how winners are determined will be sufficient;
- ii. for bingo, and some types of lottery or other games where it is not possible to determine the likelihood of winning because it depends on the eventual number of participants, a description of the way in which prizes are allocated will be sufficient.
- iii. the average theoretical return to player percentage. Where an event (other than peer-to-peer) involves an element of skill, return to player percentage should be calculated using either the auto-play strategy or a standard/published strategy;
- iv. the house edge, margin or over-round, for example for a virtual race;
- v. the probability of each winning event occurring, or such information as may reasonably be expected to allow the customer to calculate the probability that the event will occur. The nature of some games may mean that the game itself provides sufficient information, for example, the likelihood of rolling a six on a six-sided die would not require further explanation.

b. Information may be included in artwork and text displayed within the virtual game or event, in 'help' or 'how to play' pages, or other supporting material.

c. Information should be easily accessible, for example by placing links on home pages for gaming or virtual event sections, game selection pages or menus, or within individual games.

### **RTS requirement 3D**

For each virtual event, game (including bingo), or lottery, content describing the potential prizes and payouts or the means by which these are calculated or determined must be easily available before the customer commits to gamble.

### **RTS implementation guidance 3D**

a. Information should be made available about the amounts that customers may potentially win, for example in the form of pay-tables, or by showing the odds paid for particular outcomes.

b. For peer-to-peer games where the prize is determined based on the actions of the participants, a description of the way the game works and the rake or commission taken will be sufficient.

c. For lotteries and other types of events where the potential amount or prize paid out may not be known before the customer commits to gamble, describing the way in which the prize amount is determined will be sufficient.

d. Information may be included in artwork and text displayed within the virtual event, in 'help' or 'how to play' pages, or other supporting material.

e. Information should be easily accessible, for example by placing links on home pages for gaming sections, game selection pages or menus, or within individual games.

f. Displays of jackpot amounts that change over time ('progressives') should be updated as frequently as practicable, particularly after the amount has been reset following a win.

## RTS 4 – Time-critical events

### Gaming (including bingo), and betting on virtual events

#### RTS aim 4

To reduce the risk that customers are unfairly disadvantaged by technical factors that may affect speed of response, where response time has a significant impact on the likelihood of winning.

#### RTS requirement 4A

Where speed of interaction has a significant effect on the customer's chance of winning, operators must assess the level of risk and demonstrate to the Commission that they are taking reasonable steps to reduce the risk to customers.

#### RTS implementation guidance 4A

Examples of possible approaches include:

- a. estimating the degree of network latency (delay) a customer is experiencing and displaying regularly updated information to the customer about any disadvantage that they may be operating under (e.g. high, medium, low)
- b. applying a handicapping system based on estimated performance and/or system latency
- c. treating winning responses that arrive within a period of time as simultaneous and implementing a policy on how simultaneous wins are to be dealt with.

## RTS 5 – Result determination

### All gambling

#### RTS aim 5

To ensure that the gambling system implements the operator's rules, game rules and betting rules as they are described to the customer.

#### RTS requirement 5A

All reasonable steps should be taken to ensure that gambles are accepted, processed and settled in accordance with the operator's published terms and rules, and the rules of the specific game, event, or bet.

Where unexpected system flaws, faults, or errors that affect the customer occur, steps are to be taken as soon as practicable to remedy the problem and ensure that the customer is treated fairly according to the circumstances.

#### RTS implementation guidance 5A

- a. Under normal operation, in the absence of technical faults, the system should act in accordance with the rules.
- b. Reasonable steps include testing of systems and new products against the published rules.
- c. Customers should be notified when errors that affect them, for example, incorrectly settled bets, have occurred as soon as practicable after the event occurs. Steps should be taken to rectify the error, for example, by manually adjusting the customer's account.

## RTS 6 – Result determination for play-for-fun games

### Gaming (including bingo), lotteries, and betting on virtual events

#### RTS aim 6

To minimise the risk that customers are misled about the likelihood of winning due to the behaviour of play-for-fun games.

#### RTS requirement 6A

Play-for-fun games must implement the same game rules as the corresponding play-for-money games. Operators must take all reasonable steps to ensure that play-for-fun games accurately represent the likelihood of winning and prize distribution in the play-for-money game. For the purpose of this requirement playing a game includes participating in a lottery and/or betting on a virtual event.

#### RTS implementation guidance 6A

a. The play-for-free game should use the same RNG as the corresponding play-for-money games, another RNG that fulfils the requirements set out in RTS requirement 7A, or a publicly available RNG, (such as those available as standard within operating systems) that may reasonably be expected to produce no systematic bias.

b. Where 6a is not reasonably possible, it should be demonstrated that the method of producing outcomes does not introduce a systematic bias, for example:

- i. if tables of random numbers are used, they should be sufficiently long to support a large number of games without repeating
- ii. the method should represent game probabilities accurately, ie it should not produce a higher than expected proportion of winning outcomes.

c. The prize distribution should accurately represent the play-for-money game. For example, where play-for-fun games use virtual cash, the virtual cash payouts should be the same as the corresponding play-for-money game, and where tokens are used, the allocation of tokens as prizes should be proportionate to the stakes and prizes in the play-for-money game.

## RTS 7 – Generation of random outcomes

### Gaming (including bingo), lotteries, and betting on virtual events

#### RTS aim 7

To ensure that games and other virtual events operate fairly.

#### RTS requirement 7A

Random number generation and game results must be 'acceptably random'. Acceptably random here means that it is possible to demonstrate to a high degree of confidence that the output of the RNG, game, lottery and virtual event outcomes are random, through, for example, statistical analysis using generally accepted tests and methods of analysis. Adaptive behaviour (i.e. a compensated game) is not permitted.

Where lotteries use the outcome of other events external to the lottery, to determine the result of the lottery (for example, using numbers from the National Lottery) the outcome must be unpredictable and externally verifiable.

#### RTS implementation guidance 7A

a. RNG's should be capable of demonstrating the following qualities:

- i. the output from the RNG is uniformly distributed over the entire output range and game, lottery, or virtual event outcomes are distributed in accordance with the expected/theoretical probabilities
- ii. the output of the RNG, game, lottery, and virtual event outcomes should be unpredictable, for example, for a software RNG it should be computationally infeasible to predict what the next number will be without complete knowledge of the algorithm and seed value
- iii. random number generation does not reproduce the same output stream (cycle), and that two instances of a RNG do not produce the same stream as each other (synchronise)
- iv. any forms of seeding and re-seeding used do not introduce predictability
- v. any scaling applied to the output of the random number generator maintains the qualities above.

b. For lotteries using external events - where it is not practical to demonstrate 7a. - the events outcomes should be:

- i. unpredictable, that is, events should be selected only where they may reasonably be assumed to be random events
- ii. unable to be influenced by the lottery operator (or external lottery manager)
- iii. publicly available and externally verifiable, for example, events that are published in local or national press would be acceptable.

c. For games or virtual events that use the laws of physics to generate the outcome of the game (mechanical RNGs), the mechanical RNG used should be capable of meeting the requirements in

a. where applicable and in addition:

- i. the mechanical pieces should be constructed of materials to prevent decomposition of any component over time (e.g. a ball shall not disintegrate)
- ii. the properties of physical items used to choose the selection should not be altered
- iii. players should not have the ability to interact with, come into physical contact with, or manipulate the mechanics of the game.

d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.

### **RTS requirement 7B**

As far as is reasonably possible, games and events must be implemented fairly and in accordance with the rules and prevailing payouts, where applicable, as they are described to the customer.

### **RTS implementation guidance 7B**

- a. Games should implement the rules as described in the rules available to the customer before play commenced.
- b. The mapping of the random inputs to game outcomes should be in accordance with prevailing probabilities, pay tables, etc.
- c. When random numbers, scaled or otherwise, are received, e.g. following a game requesting a sequence of random numbers, they are to be used in the order in which they are received. For example, they may not be discarded due to adaptive behaviour.
- d. Numbers or sequences of numbers are not to be discarded, unless they fall outside the expected range of numbers required by the virtual event – such an occurrence should result in an error being logged and investigated.

### **RTS requirement 7C**

Game designs or features that may reasonably be expected to mislead the customer about the likelihood of particular results occurring are not permitted, including substituting losing events with near-miss losing events and simulations of real devices that do not simulate the real probabilities of the device.

### **RTS implementation guidance 7C**

- a. Where a virtual event simulates a physical device, the theoretical game probabilities should match the probabilities of the real device (for example, the probability of a coin landing heads must be 0.5 every time the coin is tossed).
- b. Where multiple physical devices are simulated the probabilities of each outcome should be independent of the other simulated devices.
- c. Games may not falsely display near-miss results, that is, the event may not substitute one losing outcome with a different losing outcome.
- d. Where the event requires a pre-determined layout (for example, hidden prizes on a map), the locations of the winning spots should not change during play, except as provided for in the rules of the game.
- e. Where games involve an element of skill, every outcome described in the virtual event rules or artwork should be possible, that is, the customer should have some chance of achieving an advertised outcome regardless of skill.
- f. Where a customer contributes to a jackpot pool, that customer should be eligible to win the jackpot whilst they are playing that game, in accordance with the game and jackpot rules.

### **RTS requirement 7D**

The rules, payouts and outcome probabilities of a virtual event or game may not be changed while it is available for gambling, except as provided for in the rules of the game, lottery or virtual event. Such changes must be brought to customer's attention.

### **RTS implementation guidance 7D**

- a. Changes to game or event rules, paytables or other parameters that change the way in which a game, lottery, or event works, the winnings paid, or likelihood of winning (except as described in 7Dc.), should be conducted with the game or event taken offline or suspended.
- b. Altered games, lotteries, and events should display a notice that informs customers that the game or event has been changed, for example, 'rules changed', 'new odds', or 'different payouts'.

The notice should be displayed on game selection screens and on the events themselves if it is possible for the customer to go straight to the event without using a selection screen.

- c. This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:
- i. virtual events, such as virtual racing products where the odds differ from event to event depending on the virtual runners
  - ii. virtual games, such as bingo where the odds of winning are dependent on the number of entrants
  - iii. games with progressive jackpots, where the amount that can be won changes over time
  - iv. games with bonus rounds where different rules apply, so long as these rounds are properly described to the customer
  - v. unspecified changes to rules, paytables or other parameters that change the way in which a game, lottery or event works are not permitted, for example, rules that state 'game rules may be changed at any time' would not be acceptable.

#### **RTS requirement 7E**

Except in the case of subscription lotteries, the system must be designed to clearly and accurately display the result of the game or event and the customer's gamble. 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.

#### **RTS implementation guidance 7E**

The game artwork and text should be sufficient to provide the customer with all of the information required to determine whether they have lost or won, and the value of any winnings.

## RTS 8 – Auto-play functionality

### Gaming

#### **RTS aim 8**

To ensure that the customer is still in control of the gambling where auto-play functionality is provided.

#### **RTS requirement 8A**

Auto-play must be implemented in such a way that the customer is able to control the amount gambled through selecting the stake and the number of auto-play gambles. The number of auto-play gambles may not exceed 25 in one batch.

#### **RTS implementation guidance 8A**

- a. The customer should choose the stake and either the number of auto-play gambles or the total amount to be gambled.
- b. During auto-play the customer should be able to stop the auto-play regardless of how many auto-play gambles they initially chose or how many remain.
- c. Auto-play should not override any of the display requirements (for example, the result of each gamble must be displayed for a reasonable length of time before the next gamble commences, as set out in RTS 7E).

## RTS 9 – Skill and chance games with auto-play

### Gaming

#### RTS aim 9

To minimise the risk that auto-play functionality disadvantages a customer or that autoplay or other strategy advice is misleading.

#### RTS requirement 9A

Strategy advice and auto-play functionality must be fair, not misleading and must not represent a poor choice.

#### RTS implementation guidance 9A

- a. In implementing this control, the following should be considered, where appropriate:
  - i. if there is a standard strategy, for example, for well known games like blackjack, the standard strategy should be used
  - ii. strategies or auto-play should (theoretically) produce at least the average Return to Player (RTP) for the game over time.

## RTS 10 – Interrupted gambling

### Peer-to-peer betting and gaming (including bingo)

#### RTS aim 10

To ensure that customers are treated fairly in the event of interrupted play or betting and that they are aware of how they will be treated if interruptions occur.

#### RTS requirement 10A

Operators must take all reasonable steps to ensure that their policies for instigating or dealing with service interruptions are fair and do not systematically disadvantage customers.

#### RTS implementation guidance 10A

- a. For gaming the following policies should be applied:
  - i. where an interruption occurs after the operator receives notification of the customer's gamble and where the customer can have no further influence on the outcome of the event or gamble the results of the gamble should stand
  - ii. where an interruption to a single-participant single stage event occurs before an outcome has been generated the customer should have any deducted stake returned to their balance
  - iii. for stateful games (games where there are multiple stages or decision points), all reasonable steps should be taken to restore the game to its last known state to enable the customer to complete the game
  - iv. games with multiple participants (equal chance or otherwise) should be dealt with fairly on a case-by-case basis
  - v. progressive jackpot values should be restored to their pre-failure state.
- b. For peer-to-peer betting the following policies should be applied:
  - i. where a service interruption is caused by failures in the gambling system, operators should suspend betting on all betting markets that have been affected by a significant event before service is restored
  - ii. other failures should be dealt with fairly on a case-by-case basis.

#### RTS requirement 10B

Systems must be capable of recovering from failures that cause interruptions to gambling, including where appropriate, the capability to void gambles (with or without manual intervention), the capability to suspend betting markets, and taking all reasonable steps to retain sufficient information to be able to restore events to their pre-failure state.

#### RTS implementation guidance 10B

- a. For gaming the system should:
  - i. be capable of voiding gambles and restoring the amount gambled to the customer automatically, or in conjunction with manual operational controls; and
  - ii. implement all reasonable measures to maintain sufficient information to be capable of automatically restoring an event to its pre-failure state so that it may be completed by the customer. The following information should be restored, as appropriate:
    - the state of a deck of cards, and any hands that have been dealt
    - number of tokens collected
    - any other predetermined information, such as maps or prize layouts
    - the value of any progressive jackpots
    - the state of any gambles, e.g. who has staked what on what outcome
    - bets placed or offered.
- b. For peer-to-peer betting, it should be possible to suspend betting markets manually or automatically.

## RTS 11 – Limiting collusion/cheating

### Peer-to-peer gaming

#### RTS aim 11

To reduce the risk that cheating or collusion by players unfairly disadvantages another player.

#### RTS requirement 11A

Measures intended to deter, prevent, and detect collusion and cheating must be implemented. Gambling systems must retain a record of relevant activities to facilitate investigation and be capable of suspending or disabling player accounts or player sessions.

#### RTS implementation guidance 11A

- a. The Information Provision Annex standard 7 provides guidance on the minimum information that should be made available to deter cheating.
- b. Relevant activities to be recorded will vary by game but may include:
  - i. which players played at which tables
  - ii. the amounts won from and lost to accounts
  - iii. game activities to an individual bet/action level.
- c. Where appropriate, prevention measures may include:
  - i. taking steps to prevent a player from occupying more than one seat at any individual table.
- d. Detection measures may include, detecting and investigating the following, where appropriate:
  - i. players who frequently share the same tables
  - ii. players from same address who share the same table
  - iii. suspicious patterns of play (such as chip dumping).
- e. Customer complaints about cheating should be investigated.

## RTS 12 – Financial limits

### All gambling

#### RTS aim 12

To provide customers with facilities that may assist them in sticking to their personal budgets for gambling with the operator.

#### RTS requirement 12A

The gambling system must provide easily accessible facilities that make it possible for customers to impose their own financial limits. Customers must be given the opportunity to set a limit as part of the registration process (or at the point at which the customer makes the first deposit or payment).

For lotteries, where the customer's spend is controlled through subscriptions, additional facilities do not have to be provided.

#### RTS implementation guidance 12A

a. For telephone gambling (except lotteries), customers should be asked if they would like to set a deposit or spend limit when they register. Customers should be able to request a limit at any point after registration. The limit should be implemented as soon as practicable after the customer's request. The customer should be informed when the limit will come into force.

b. For other access media (including internet, interactive TV and mobile), customers should be offered the opportunity to select a deposit/spend limit from a list which may contain a 'no limit' option or to enter a limit of their choice as part of the registration or first deposit process. The 'no limit' option should not be the default option.

c. Limits could be in the form of:

- i. deposit limits: where the amount a customer deposits into their account is limited over a particular duration
- ii. spend limits: where the amount a customer spends on gambling (or specific gambling products) is restricted for a given period – this type of limit may be appropriate where the customer does not hold a deposit account with the operator
- iii. loss limits: where the amount lost (i.e. winnings subtracted from the amount spent) is restricted (for instance when a customer makes a £10 bet and wins £8, the loss is £2).

d. The period/duration of the limit should be no less than one day (or 24 hours).

e. In addition:

- i. limits may be implemented per customer, per account, or other means
- ii. limits could also be implemented across all products or channels or for individual products or channels
- iii. financial limit facilities should be provided via a link on the home page
- iv. facilities should be available on deposit pages/screens or via a link on these pages/screens.

#### RTS requirement 12B

All reasonable steps must be taken to ensure that customer-led limits are only increased at the customer's request, and only after a cooling-off period of 24 hours has elapsed.

#### RTS implementation guidance 12B

a. Increases should not be implemented until a cooling-off period of at least 24 hours from the point at which the request to increase the limit was received. Where it is practicable to do so, the customer should be required to confirm that they still wish to increase the limit at the end of the cooling-off period.

b. Where possible (for instance, unless systems/technical failures prevent it) limit reductions are to be implemented within 24 hours of the request being received.

## RTS 13 – Time requirements

### All gambling except telephone gambling

#### RTS aim 13

To provide customers with facilities to assist them to keep track of the time they spend gambling.

#### RTS requirement 13A

Where the gambling system uses full screen client applications that obscure the clock on the customer's device the client application itself must display the time of day or the elapsed time since the application was started, wherever practicable.

#### RTS implementation guidance 13A

- a. Time of day should either be taken from the customer's own device or 'server time' and should be displayed in hours and minutes.
- b. Operators will not be expected to detect whether or not customers have hidden their clocks.
- c. Elapsed time should be displayed in minutes and hours.
- d. For restricted display devices, time of day or elapsed time should be displayed where the device supports it.
- e. In addition, customers may be offered the ability to set a session or game-play duration reminder.

## RTS 14 – Responsible product design

### All gambling

#### RTS aim 14

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

#### RTS requirement 14A

Gambling products must not actively encourage customers to chase their losses, increase their stake or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they wish to stop.

#### RTS implementation guidance 14A

a. By actively encourage, we mean the inclusion of specific features, functions or information that could reasonably be expected to encourage a greater likelihood of the behaviours described occurring. For example:

- i. the amount of funds taken into a product should not be topped up without the customer choosing to do so on each occasion, e.g. when a customer buys-in at a poker table they should have to choose to purchase more chips to play at the table - automatic re-buys should not be provided
- ii. written or graphical information should not encourage customers to try to win back their losses
- iii. customers who have chosen to exit a game should not be encouraged to continue playing by, for example, being offered a free game.

b. This requirement is not intended to prevent operators from offering special features or well-known games such as blackjack that allow customers to increase their stake on the occurrence of specific events (e.g. split).

## 4 Information provision annex (IPA) standards

### IPA 1 – Customer account information

#### All gambling except subscription lotteries

##### IPA aim 1

To provide customers with facilities that enable them to review previous gambling and account transactions.

##### IPA requirement 1A

Customers must have easy access to their account and gambling history. Where customers access operators' products or register via websites, it is acceptable to provide access to statements via these websites. For customers who do not access or register via websites, information is to be provided via the medium of access, or a copy must be sent via email, fax, or post.

##### IPA implementation guidance 1A

- a. Account history should include credit and debit information such as deposits, withdrawals, movement of funds between products, payments off credit accounts, entry fee deductions, and bonus information, as appropriate.
- b. For betting, gambling history should include bets placed, and the results of bets, including winnings paid. For gaming (including bingo) full or summarised gaming information should be available, for example, £10 taken into game, £100 turned over, £3 taken away from game.
- c. Where customers are able to move funds between gambling products, account information and statements should clearly display movement of funds into and out of products.
- d. For telephone betting, where customers demonstrate that they also have access to websites – by registering online or using other online products – it is acceptable to provide access to statements via these websites, otherwise customers should be sent a regular copy of their statement via email, fax or post unless they elect not to receive this information. Customers should be sent a statement on request, even if they have opted out of receiving regular statements.
- e. For gaming, where detailed historic game information may not necessarily be directly available to customers, as a minimum, customers should have easy access to details of the last game played and summarised information for previous activities.
- f. For restricted display devices, where customers demonstrate that they also have access to websites – for example, by registering online or using other online products – it is acceptable to provide access to statements via these websites. Otherwise, if the information cannot practicably be provided on the device, customers should be sent a copy of the statement via email, fax or post.

## IPA 2 – Displaying transactions – third party user-interfaces

### **IPA aim 2**

To inform customers who choose to use third party user-interfaces that they may not receive full information about their gambles.

### **IPA requirement 2A**

Customers must be informed that third party interface applications may not display full information about the customer's gambles.

### **IPA implementation guidance 2A**

a. Information should be included in terms and conditions, rules or other general information about the gambling product that is made available to and/or sent out to customers.

## IPA 3 – In-running betting

### Betting and peer-to-peer betting

#### IPA aim 3

To make the customer aware that they may not have the latest information available when betting on live events, and that they may be at a disadvantage to operators or other customers who have more up-to-date information.

#### IPA requirement 3A

Information must be made available that explains that 'live' TV or other broadcasts are delayed and that others may have more up-to-date information. Main in-running betting pages must be designed to include this information where practicable.

#### IPA implementation guidance 3A

- a. Brief information should be included on main in-running pages or screens, such as the in-running home page or screen. More detail should be provided in 'help' or 'how to' or other product pages or screens.
- b. For telephone betting the information should be included in the general betting or product information that is made available to and/or sent out to customers.
- c. Where a brief notice cannot be practicably included on the main pages or screens, the information should be provided on easily accessible 'help', 'how to' or other product pages or screens.

## IPA 4 – Use of automated gambling software

### Peer-to-peer gambling

#### IPA aim 4

To make customers in peer-to-peer(s) gambling aware that they may be gambling against a software program (designed to automatically participate in gambling within certain parameters), rather than another (human) participant. This software is sometimes referred to as a robot or bot.

#### IPA requirement 4A

Where operators use programs to participate in gambling on their behalf in peer-to-peer gambling, easily accessible information must be displayed, which clearly informs customers that the operator uses this kind of software.

#### IPA implementation guidance 4A

a. Peer-to-peer(s) gambling operators that use software to gamble on their behalf (for example, poker robots) should display a notice to customers on the home pages or screens and in the game description, 'help' or 'how to play/bet' pages or screens.

b. As a minimum, restricted display devices should provide a link to further information on gambling pages/screens or in 'help', 'about' or 'how to bet/play' pages or screens.

#### IPA requirement 4B

Where peer-to-peer(s) customers may be gambling against programs deployed by other customers to play on their behalf, information should be made available that describes that this is possible, and if it is against the operator's terms and conditions to use robots, how to report suspected robot use.

#### IPA implementation guidance 4B

a. The warning and information about how to complain should be included in game descriptions, rules, terms and conditions, 'help', 'how to play' or other general product information pages.

b. The warning should also inform customers that if they use a program to gamble on their behalf, other customers may be able to exploit it.

## IPA 5 – Time-critical events

### **Gaming (including bingo), betting on virtual events, and peer-to-peer betting**

#### **IPA aim 5**

To make the customer aware that they may be at a disadvantage due to technical characteristics, such as slower network connections or lower end user device performance, if they are participating in a time-critical form of gambling (where the customer's speed of interaction influences their chance of winning).

#### **IPA requirement 5A**

For time-critical events, the customer should be informed that they might be at a disadvantage because of technical issues such as slower network speeds, or slower end user device performance.

#### **IPA implementation guidance 5A**

a. Information should be included in game descriptions, rules, 'help' or 'how to play' pages.

## IPA 6 – Interrupted gambling

### **Gaming (including bingo), betting on virtual events, and peer-to-peer betting**

#### **IPA aim 6**

To inform customers about the operator's policies with regard to service interruptions and how they are likely to be treated if interruption occurs so that they may make an informed decision about whether to gamble and in what way.

#### **IPA requirement 6A**

Operators must make available information about their policies regarding service interruptions in various different circumstances.

#### **IPA implementation guidance 6A**

a. Operators should make information available to customers about how they will be treated in various common scenarios. However, this does not mean that operators have to detail all possible scenarios or responses to service interruptions.

## IPA 7 – Limiting collusion/cheating

### Peer-to-peer gaming

#### IPA aim 7

To inform customers about the risks posed by collusion/cheating and to deter individuals from attempting to cheat.

#### IPA requirement 7A

Information must be made available about the operator's policies and procedures with regard to cheating, and about how to complain if a customer suspects other participants are cheating.

#### IPA implementation guidance 7A

- a. As a minimum deterrent, customers should be informed that accounts will be closed if the customer is found to have cheated.
- b. Relevant information should be included in terms and conditions or rules.

## 5 Remote gambling and software technical standards – security requirements

- 5.1** This section sets out a summary of the RTS security requirements that licence holders must meet. The Commission has based the security requirements on the relevant sections of Annex A to the ISO/EIC 27001: 2005 standard. The full sections of the relevant security requirements can be obtained in paper format from the Commission. Alternatively a full copy of the British Standards can be obtained from BSI Customer Services, 389 Chiswick High Road, London, W4 4AL. Tel: ++ 44 (0)20 8996 9001. Email: [cservices@bsigroup.com](mailto:cservices@bsigroup.com)
- 5.2** The Commission's aim in setting out the security standards is to ensure customers are not exposed to unnecessary security risks by choosing to participate in remote gambling. The Commission has highlighted those systems that are most critical to achieving the Commission's aims and the security standards apply to these critical systems:
- electronic systems that record, store, process, share, transmit or retrieve sensitive customer information, eg credit/debit card details, authentication information, customer account balances
  - electronic systems that generate, transmit, or process random numbers used to determine the outcome of games or virtual events
  - electronic systems that store results or the current state of a customer's gamble;
  - points of entry to and exit from the above systems (other systems that are able to communicate directly with core critical systems)
  - communication networks that transmit sensitive customer information.

### Security requirements summary

#### Standard – A.5 Security Policy

Objective A.5.1 Information security policy

Requirement A.5.1.1 Information security policy document

Requirement A.5.1.2 Review of the information security policy

#### Standard – A.6 Organization of information policy

Objective A.6.1 Internal organization

Requirement A.6.1.8 Independent review of information security

#### Standard – A.8 Human resources security

Objective A.8.2 During employment

Requirement A.8.2.2 Information security awareness, education and training

Objective A.8.3 Termination or change of employment

Requirement A.8.3.3 Removal of access rights

#### Standard – A.9 Physical and environmental security

Objective A.9.2 Equipment security

Requirement A.9.2.1 Equipment siting and protection

Requirement A.9.2.6 Secure disposal or re-use of equipment

**Standard – A.10 Communications and operations management**

Objective A.10.1 Operational procedures and responsibilities

Requirement A.10.1.4 Separation of development, test and operational facilities

Objective A.10.2 Third party service delivery management

Requirement A.10.2.1 Service delivery

Requirement A.10.2.2 Monitoring and review of third party services

Requirement A.10.2.3 Managing changes to third party services

Objective A.10.4 Protection against malicious and mobile code

Requirement A.10.4.1 Controls against malicious code

Requirement A.10.4.2 Controls against mobile code

Objective A.10.5 Back-up

Requirement A.10.5.1 Information back-up

Objective A.10.6 Network security management

Requirement A.10.6.1 Network controls

Requirement A.10.6.2 Security of network services

Objective A.10.7 Media handling

Requirement A.10.7.1 Management of removable data

Requirement A.10.7.2 Disposal of media

Requirement A.10.7.3 Information handling procedures

Requirement A.10.7.4 Security of system documentation

Objective A.10.9 Electronic commerce services

Requirement A.10.9.1 Electronic commerce

Requirement A.10.9.2 On-line transactions

Objective A.10.10 Monitoring

Requirement A.10.10.1 Audit logging

Requirement A.10.10.2 Monitoring systems use

Requirement 10.10.3 Protection of log information

Requirement 10.10.4 Administrator and operator logs

Requirement 10.10.5 Fault logging

Requirement A.10.10.6 Clock synchronization

### **Standard – A.11 Business requirement for access control**

Objective A.11.1 Business requirement for access control

Requirement A.11.1.1 Access control policy

Objective A.11.2 User access management

Requirement A.11.2.1 User registration

Requirement A.11.2.2 Privilege management

Requirement A.11.2.3 User password management

Requirement A.11.2.4 Review of user access rights

Objective A.11.3 User responsibilities

Requirement A.11.3.1 Password use

Requirement A.11.3.2 Unattended user equipment

Objective A.11.4 Network access control

Requirement A.11.4.1 Policy on use of network services

Requirement A.11.4.2 User authentication for external connection

Requirement A.11.4.3 Equipment identification in networks

Requirement A.11.4.4 Remote diagnostic and configuration port protection

Requirement A.11.4.5 Segregation in networks

Requirement A.11.4.6 Network connection control

Requirement A.11.4.7 Network routing control

Objective A.11.5 Operating system access control

Requirement A.11.5.1 Secure log-on procedures

Requirement A.11.5.2 User identification and authentication

Requirement A.11.5.3 Password management system

Requirement A.11.5.4 Use of system utilities

Requirement A.11.5.5 Session time-out

Requirement A.11.5.6 Limitation of connection time

Objective A.11.6 Application and information access control

Requirement A.11.6.1 Information access restriction

Requirement A.11.6.2 Sensitive system isolation

Objective A.11.7 Mobile computing and teleworking

Requirement A.11.7.1 Mobile computing and communications

Requirement A.11.7.2 Teleworking

### **Standard – A.12 Correct processing in applications**

Objective A.12.2 Correct processing in applications

Requirement A.12.2.1 Input data validation

Requirement A.12.2.2 Control of internal processing

Requirement A.12.2.3 Message integrity

Requirement A.12.2.4 Output data validation

Objective A.12.3 Cryptographic controls

Requirement A.12.3.1 Policy on the use of cryptographic controls

Requirement A.12.3.2 Key management

***These requirements were notified in draft to the European Commission in accordance with Directive 98/34/EC, as amended by Directive 98/48/EC.***

**Gambling Commission August 2009**

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## **Keeping gambling fair and safe for all**

For further information or to register your interest in the Commission please visit our website at:  
**[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)**

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