



# Responsible Gaming Framework

## Massachusetts Gaming Commission

The Responsible Gaming Framework is designed to provide structure for responsible gaming practices of Massachusetts Gaming Commission licensees and is based on the commitment by the Massachusetts Gaming Commission and their licensees to the guiding value of ethical and responsible behavior.

Version 1

# Acknowledgements

The preliminary development of the Massachusetts Gaming Commission (MGC) Responsible Gaming Framework consisted of an extensive research process involving the review of a broad range of academic papers and studies, policy papers, investigative reports, jurisdictional reviews, corporate reporting documents, and legislation relating to gambling issues in Massachusetts, other United States jurisdictions, and abroad. From this review, materials produced by the following entities most notably informed the Framework:

- American Gaming Association
- Australian Government Productivity Commission
- British Columbia Lottery Corporation
- New Zealand Department of Internal Affairs
- New Zealand Ministry of Health
- Nova Scotia Government (multiple agencies)
- Ontario Problem Gambling Research Centre
- Ontario Responsible Gambling Council
- Queensland Government Office of Liquor and Gaming Regulation

Scholarly papers of notable significance to the development of the Framework include:

- Blaszczynski, A., Collins, P., Fong, D., Ladouceur, R., Nower, L., Shaffer, H. J., & Venisse, J. L. (2011). Responsible gambling: General principles and minimal requirements. *Journal of Gambling Studies*, 27(4), 565-573.
- Hancock, L., Schellinck, T., & Schrans, T. (2008). Gambling and corporate social responsibility (CSR): Re-defining industry and state roles on duty of care, host responsibility and risk management. *Policy and Society*, 27(1), 55-68
- Williams, R.J., West, B.L., & Simpson, R.I. (2012). Prevention of Problem Gambling: A Comprehensive Review of the Evidence, and Identified Best Practices. Report prepared for the Ontario Problem Gambling Research Centre and the Ontario Ministry of Health and Long Term Care. October 1, 2012.

Key to the refinement of the Framework was input and information gathered from the Massachusetts Department of Health, Massachusetts Council on Compulsive Gambling, participants of the Massachusetts Partnership for Responsible Gaming, Problem Gambling Solutions, Inc., and other stakeholders from government agencies, the gambling industry, advocacy groups, academicians, not-for-profit organizations, and concerned citizens of Massachusetts.

# Responsible Gaming Framework

## *Massachusetts Gaming Commission*

### Introduction

The Responsible Gaming Framework is intended to inform gaming regulation in Massachusetts and provide an overall orientation to responsible gaming practice and policy adopted by the MGC and gaming licensees. The framework is not designed to function as a regulation, but to guide the Commission’s decisions as it promulgates regulation. The Responsible Gaming Framework is based on the commitment by the MGC and its licensees to the guiding value of ethical and responsible behavior.

The Responsible Gaming Framework provides an approach through which licensees can ensure their general gaming practices are consistent with the Commission’s expectations that gaming in the Commonwealth will be conducted in a manner to minimize harm.

The MGC Responsible Gaming Framework supports the implementation of the expanded gaming law (chapter 194 of the Acts of 2011, M.G.L. chapter 23K, or “the Gaming Act”) of the Commonwealth of Massachusetts. The legislation includes a number of key mandates to ensure the successful implementation of expanded gaming including, protection for host and surrounding communities and mitigation of social impacts and costs.

#### Key Terms:

##### Responsible gaming



Responsible gaming is the provision of gambling services in a way that seeks to minimize the harm to customers and the community associated with gambling.

##### Problem gambling



Problem gambling is characterized by gambling behavior which leads to a continuum of adverse consequences for the gambler, others, and the community.

# Guiding Values & Approach

The Responsible Gaming Framework is guided by the values expressed in the mission statement of the Massachusetts Gaming Commission:

*The Massachusetts Gaming Commission will strive to ensure that its decision-making and regulatory systems engender the confidence of the public and participants, and that they provide the greatest possible economic development benefits and revenues to the people of the Commonwealth, reduce to the maximum extent possible the potentially negative or unintended consequences of the new legislation, and allow an appropriate return on investment for gaming providers that assures the operation of casino-resorts of the highest quality.*

To this end, the MGC Responsible Gaming Framework's aim is to create a sustainable, measurable, socially responsible, and accountable approach to gaming.

The Responsible Gaming Framework has adopted an evidence-based approach to responsible gaming measures where sound research or evidence is available. Where evidence is lacking, uncertain or ambiguous, and there is reasonable concern that gambling related harm may occur, a precautionary approach has been applied. The precautionary approach rejects the notion that risks are acceptable until harm has been proven or that risks can continue unmitigated until such time as the effectiveness of a harm minimization measure is proven. While all responsible gaming measures will be evaluated and continually improved upon, measures driven by a precautionary approach will be subject to more rigorous evaluation. Responsible gaming efforts in their entirety will retain flexibility to respond to emerging evidence, and the evolving technological and cultural environment.

As gaming regulators, the MGC Responsible Gaming Framework's focus is on gaming licensees' practices. However, the MGC believes licensees do not have an isolated role in minimizing the potential harm of gambling. Government, science, industry, and gaming consumers must all take part to most effectively minimize harm caused or exacerbated by gambling.

# Goal & Objectives

**Goal:** To create a sustainable, measurable, socially responsible and accountable approach to gaming.

## **Regulatory Objectives:**

- Minimize harm from gambling to individuals, families, and communities while serving the good of the Commonwealth and gaming licensees.
- Promote best and promising responsible gaming practices in all aspects of licensee activities.
- Utilize principles of responsible gaming in introducing all new and emerging technologies.

## **Research Objectives<sup>1</sup>:**

- Inform best practice in responsible gaming strategies and methods, problem gambling treatment and prevention, and responsible gaming messaging.
- Create and translate knowledge to support evidence-informed decision making about gambling policy and regulation.

## **Education Objectives:**

- Provide accurate and balanced information to enable informed choices to be made about gaming activities.
- Provide patrons adversely affected by gambling with timely access and appropriate information on problem gambling; and counsel to where assistance in dealing with such matters can be obtained.
- Create a shared understanding of responsible gaming practices among individuals, communities, the gambling industry and the government.

---

<sup>1</sup> Gaming licensees will be participants in meeting research objectives; they will not be solely responsible. The Gaming Act requires that the Commission establish an “annual research agenda” in order to understand the social and economic impacts of expanded gaming in the Commonwealth. Research grantees will collaborate with gaming operators, governmental agencies, and others to meet research objectives.

# Strategies

The Responsible Gaming Framework commits the MGC licensees to implement responsible gaming strategies, with a particular focus on prevention and customer protection practices.

The Responsible Gaming Framework is organized into the following broad strategies:

1. Commit to corporate social responsibility
2. Support informed player choice
3. Provide protections within the physical environment
4. Ensure responsible marketing
5. Manage high-risk financial transactions
6. Engage the community

Each strategy contains a number of related responsible gaming practices. MGC licensees are responsible for ensuring their commitment to the relevant practices and compliance with related regulations.

The Responsible Gaming Framework, strategies and practices, will be monitored and evaluated regularly by the MGC for effectiveness and fidelity. Where appropriate, policies and practices will be promulgated into regulation.

Responsible gaming strategies and practices will continue to evolve in response to innovation and new evidence related to problem gambling and responsible gaming. The MGC Responsible Gaming Framework strategies and practices will be periodically reviewed and revised.

# Strategy 1: Commit to Corporate Social Responsibility

**1.1** The aim of Corporate Social Responsibility (CSR) is to minimize the negative environmental and social impacts and maximize the positive impacts. Social responsibility, sustainability, consumer protection and product safety are central to public confidence and therefore need to constitute a core business approach driven from the top by strong corporate leadership, built into business purpose and strategy, and woven into the organization's culture.

**1.2** To demonstrate a commitment to promoting responsible gaming and addressing problem gambling, it's important that each MGC licensee include responsible gaming policies within their code of ethics and implement a Responsible Gaming Plan. Each licensee should maintain records relating to the practices and policies outlined in the Responsible Gaming Framework.

These commitments are specific to licensee operations in order to:

- Educate employees about responsible gaming and their role in promoting a responsible gaming environment inclusive of the requirement that all employees participate in MGC approved responsible gaming employee training programs.
- Reduce the risk of employee gambling related problems through policies and practices inclusive of educational programs and resources for employees in need of assistance.
- Assist in creating an environment that meets the needs of a broad range of customers, including individuals and their family members who are adversely affected by problem gambling behavior.
- Ensure that an appropriate level of awareness relating to responsible gaming is maintained throughout the licensed organization and key contractors, so that responsible gaming is made an integral part of daily operations.
- Provide employees with clear statements of expectations and responsibilities including an emphasis on the importance of employees in promoting responsible gaming and creating a healthy gaming environment.
- Designate responsible gaming duties for senior management and other leadership positions.
- Give consideration to the needs of their local communities with a particular focus on any geographic and cultural issues.
- Assure effective implementation of policies and practices property-wide, conducting internal audits, surveying employees, and reviewing relevant data, on a regular basis, with a responsible gaming committee.
- Detail a systematic approach to measuring and reporting on the licensee's commitments, actions and progress on responsible gaming practices.

# Strategy 2: Support Informed Player Choice

## 2.1 Informed Decision Making

Informed decision making requires that patrons have the information they need to make gambling decisions. Licensees have a role to assure information available throughout the gaming establishment.

The Informed Decision Making (IDM) framework consists of three separate information strategies aimed at three different types of gamblers:

- **Casual Gamblers** may benefit from programs that enhance their gambling literacy – i.e., how gambling works and what are the key safeguards and minimize risk factors.
- **Frequent Gamblers** may benefit from a deeper understanding of how gambling works as well as information dispelling common gambling myths.
- **Intensive Gamblers** may benefit from information about their play activity, the use of self-assessment tools and the options available for help.

Information guided by the Informed Decision Making Framework should be made available through a variety of practices and methods including displaying materials throughout the gaming establishment (see Appendix B for guidelines), utilization of Play Information and Management Systems, and within the Responsible Gaming Information Centers (RGIC).

## 2.2 Play Information and Management Systems

Informed player choice is enhanced through the use of voluntary play information and management systems. Play management tools are incorporated into player management software and gaming devices to enable players to more easily track their play, manage their gambling decisions, and obtain individualized play feedback. A few key considerations to the successful implementation of a play information and management system include ease of use, incentives to use the tools and availability within the gaming area. These tools are generally preventative measures that assist players maintain awareness of their play.

The MGC will investigate the feasibility including the cost, available technology and effectiveness of incorporating play information and management systems into the development of regulations.

- **Play management tools** include limit setting where players can voluntarily choose to set time limits, loss limits and / or win limits, and receive pop-up reminders to help them stay within their pre-determined limits.
- **Play information tools** provide patrons with access to: cost of play messaging and monthly statements including the patron's total bets, wins, and losses; tips on keeping play manageable; educational quizzes; and information on how to access assistance.

## 2.3 Responsible Gaming Information Center

Each gaming establishment is required by statute to provide on-site space for player education services staffed by third-party vendors contracted through the MGC. To receive maximum visibility, the Responsible Gaming Information Center (RGIC), should be located near the gaming area of the casino to serve as the patrons' central point of contact for inquiries and enrollment into voluntary responsible gaming programs and services, including self-exclusion programs; play information and management systems; and educational tools to assess play risks, provide responsible gaming tips, and increase players' knowledge of how games work while dispelling common gambling myths. Within the RGIC, patrons will have access to privacy controlled environments where they can log into their responsible gaming accounts and access computer assisted information and services. A responsible gaming professional will be available during peak hours and patrons will have access to a phone where they can call the 24 hour Massachusetts Problem Gambling Helpline.

## 2.4 Self-Exclusion

As required by statute, self-exclusion programs are available to assist patrons who recognize they have experienced a loss of control over their gambling and wish to invoke external controls. Licensees will inform the public and make available to patrons three forms of self-exclusion: the ability to opt-out of marketing lists; the option to be banned from receiving house-credit and/or check cashing privileges; and voluntary exclusion from MGC licensed gambling venues state-wide. The self-exclusion process utilizes an engaged approach ensuring the patron obtains the assistance needed, is responded to in a respectful, timely, discreet manner, and feels supported. Licensees will set mechanisms and procedures in place to enforce self-exclusion agreements and assist individuals attempting to break their agreement. Gaming wins and losses by banned individuals will be transferred to the MGC Gaming Revenue Fund.

Individuals utilizing the casino self-exclusion program will select the minimum duration of their self-exclusion. At any time after the expiration of the selected duration of exclusion, an individual may request that their name be removed from the voluntary self-exclusion list by submitting a petition for removal and participating in an educational session with an agent designated by the MGC.

# Strategy 3: Provide Protections within the Physical Environment

## 3.1 Restrict Access to Gambling by Underage Persons

Licensees should implement policies and practices designed to prevent legally underage persons from gambling and from entering designated gambling areas. Licensees should take all reasonable steps to ensure that staff understands their responsibilities for preventing underage gambling. Gaming wins and losses by underage persons will be transferred to the MGC Gaming Revenue Fund

## 3.2 Monitor Premises for Unattended Children

Licensees should establish policies and practices to safeguard children from neglect or abandonment when a child is brought to the licensee's property by a casino patron, including monitoring premises and motor vehicles parked within licensee's grounds.

## 3.3 Prohibit Tobacco Use in Gaming Establishments

In order to maintain a safe and healthy work environment for all employees and patrons, licensees will establish and enforce a prohibition of smoking in all enclosed areas of the gaming establishment, and prohibit the use of e-cigarettes in accordance with local regulation.

## 3.4 Minimize Alcohol Abuse

Alcohol has a disinhibiting effect on gambling behavior. Therefore, licensees should incorporate policies and practices to prevent visibly intoxicated persons from gambling, including the following:

- Escort visibly intoxicated persons from the gaming area.
- Use an MGC approved training program for beverage servers, security, valet attendants and other personnel to reduce potential harm caused by intoxicated patrons.
- Prohibit the distribution of alcoholic beverages to visibly intoxicated persons.
- Prohibit the distribution of alcoholic beverages to all persons between the hours of 2:00 a.m. and 8:00a.m

## 3.5 Assist Customers in Need

Licensees should develop customer assistance policies and practices to appropriately respond to customers asking for assistance, exhibiting behaviors disruptive to others, displaying emotional distress, and showing symptoms of fatigue or medical needs. Customer assistance programs should be designed to offer aid to any patron in need with emphasis placed on developing training, procedures, and evaluation methods for assisting those with a suspected gambling problem.

### **3.6 Encourage Breaks in Play**

In an effort to encourage breaks in play licensees should take the following measures:

- Offer amenities including hospitality services and non-gaming forms of entertainment in areas where gambling is provided.
- Display clocks in prominent locations in the gaming area to help patrons track the passage of time.

### **3.7 Involuntary Exclusions**

In an effort to protect individuals who manifest a severe gambling disorder and are unable or unwilling to exclude themselves from an MGC licensed gaming facility, involuntary exclusions will be made available. Licensees will enforce the exclusion of individuals who are banned from gaming establishments by an entity other than the excluded individual.

# Strategy 4: Ensure Responsible Marketing

Licensees should develop and implement strategies to ensure advertising and promotions are delivered in a responsible manner, responsible gaming messaging is well integrated into casino marketing materials and advertising is sensitive to concerns about youth exposure to gambling promotion

As a minimum standard for casino advertising and marketing, guidelines adapted from the American Gaming Association's Code of Conduct should be followed. Enhanced advertising guidelines specific to the protection of youth are found in Appendix C.

For the purposes of this practice, advertising and marketing includes, among other media, radio and television, print ads, direct mail, social media, billboards and Internet promotions.

## 4.1 Accepted practices in casino gambling advertising and marketing minimally includes:

- Responsible gaming messages and/or a toll-free help line number prominently displayed in a font that is proportionate to the rest of the message.
- Compliance with all state and federal standards to make no false or misleading claims.

## 4.2 Practices in casino gambling and advertising generally do not:

- Contain images, symbols, celebrity/entertainer endorsements and language designed to appeal specifically to children or minors.
- Feature anyone who is or appears to be below the legal age to participate in gambling activity.
- Contain claims or representations that gambling activity will guarantee an individual's social, financial or personal success.
- Be placed before any audience where most of the audience is ordinarily expected to be below the legal age to participate in gambling activity.
- Imply or suggest any illegal activity of any kind.
- Encourage people to play beyond their means.
- Imply the certainty of reward.
- Exaggerate the chances of winning.
- Encourage excessive or irresponsible play.

# Strategy 5: Manage High-Risk Financial Transactions

## 5.1 Financial Transactions

Licensees will develop policies that ensure all legal, statutory, or regulatory requirements relating to check cashing, payment of winnings and financial transactions are implemented.

## 5.2 House Credit

Gambling on borrowed money is considered a high-risk practice that necessitates consumer protections. The following safeguards are intended to assure that risks associated with issuing house credit are minimized:

- Credit worthiness of an applicant will be verified using MGC approved procedures.
- House credit will only be extended to patrons who qualify for a minimum threshold and will not exceed the amount requested by the patron.
- Credit applications will include an MGC approved problem gambling self-assessment.
- Credit officers will obtain verbal verification from credit applicants that they are comfortable losing up to the amount of credit requested and granted.
- House credit will not be offered to persons who self-identify as a problem gambler, place themselves on a voluntary credit suspension list, or are recipients of public assistance.
- Increases in credit may be restricted by frequency and amount.
- Credit requests, including extensions, may not be accepted from patrons who are visibly intoxicated or exhibiting behaviors suggestive of impaired mental competency.

## 5.3 Bank Card Transactions

Using credit cards to finance gambling results in high fees and interest rates charged by credit card institutions and may lead to serious debt problems. For these reasons, bank card transactions should not be offered in the gaming area. ATM services should not be located within 15 feet of gaming areas.

## 5.4 Check Cashing

Licensees should develop and implement a system of internal controls relative to the acceptance of checks presented by patrons for gaming purposes. These controls should prohibit cashing third party checks other than bank issued cashier's checks or travelers checks.

## Strategy 6: Engage the Community

Licensees should actively engage the community to promote broad-based citizen participation in addressing concerns and strengthening community relationships.

- 6.1 Establish policies and practices to gather customer comments and to respond to customer complaints.
- 6.2 Develop relationships with relevant community organizations that provide support and information for individuals experiencing problems and their families.
- 6.3 Regularly engage with parties interested in problem gambling and responsible gaming issues formally and informally and periodically report activities to the MGC.
- 6.4 Provide opportunities for interested parties to voice relevant concerns or questions. Where appropriate, integrate the information into strategic-decision making and community mitigation processes.
- 6.5 Designate easy to access space within the casino property for a RGIC. Within the RGIC, licensees will designate an office for private meetings between patrons with concerns related to their gambling and counselors or other staff trained in crisis intervention, mental health triage, and the facilitation of a self-exclusion process.

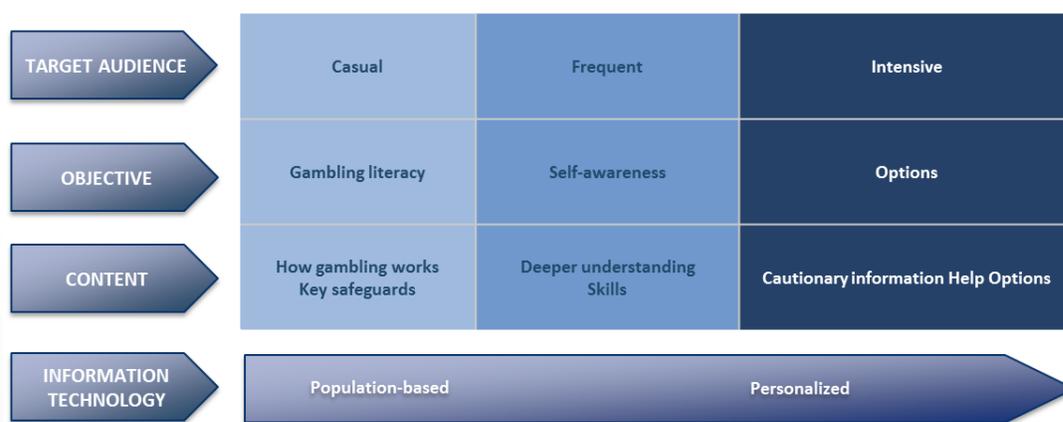
# Appendix A: Informed Decision Making<sup>2</sup>

Using the data and extensive analysis from the Insight 2010 project, the Ontario Responsible Gambling Council’s Centre for the Advancement of Best Practices developed an Informed Decision Making (IDM) framework, designed to assist decision makers in their efforts to promote informed decisions among patrons and to reduce the risk that patrons will develop problems related to their gambling.

The resulting report identifies a framework consists of three separate information programs aimed at three different types of gamblers:

- **Casual Gamblers** may benefit from programs that enhance their gambling literacy – i.e., how gambling works, what the key safeguards and main risk factors are.
- **Frequent Gamblers** may benefit from a deeper understanding of how gambling works as well as information dispelling common gambling myths.
- **Intensive Gamblers** may benefit from information about their play activity, the use of self-assessment tools that draw attention to the consequences of their actions and the options available for help.

If an individual moves from casual, to frequent, to intensive gambling, these changes have important implications for information objectives, content and delivery. The objective for the casual gambler is to promote basic gambling literacy; for the frequent gambler to promote self-awareness of one’s gambling, and for the intensive gambler is to provide cautionary information and raise awareness of options to reduce risk. The way information is delivered also changes with increased level of risk, moving from population-based strategies with more broad-based messaging, to more personalized delivery methods using individualized communications between patrons and staff members. The more personalized and targeted delivery reflects the more critical need for exposure to the information.



<sup>2</sup> Excerpts from: Responsible Gambling Council, Centre for the Advancement of Best Practices, INSIGHT, Informed Decision Making, 2010. The full report is available at: <http://www.responsiblegambling.org/docs/default-source/research-reports/informed-decision-making.pdf?sfvrsn=17>

# Appendix B: Display of Responsible Gaming Material Guidelines

## DISPLAY OF RESPONSIBLE GAMING MATERIAL GUIDELINES

Responsible gaming signage and information should be available at each location where gambling is taking place, publicize the Massachusetts Problem Gambling Helpline, and promote problem gambling treatment services. Consideration in messaging should be given to ensure people from linguistically diverse backgrounds have access to messaging.

Method:

- Massachusetts Gaming Commission approved responsible gaming posters should be displayed in full view of gambling customers, as well as in staff areas.
- Video systems should periodically display the relevant information with regard to the helpline.
- Responsible gaming and problem gambling treatment messaging should be available in guestrooms, lounges, and other public areas.
- Responsible gaming and problem gambling treatment messaging should be available at gambling point of sales, such as cashier cages, casino tables, and pari-mutuel windows.
- Problem Gambling Helpline details should appear on all gaming machines, including slot machines, either on a sticker or displayed on the machine screen.
- Responsible gaming and problem gambling treatment messaging should be available at all cash desks, information desks, and club desks, and other frequently visited locations proximate to the gambling area.
- ATM machines near the gaming areas should have problem gambling helpline signage affixed to the machines, periodic on-screen responsible gaming messages, and problem gambling assistance information printed on each transaction receipt.

# Appendix C: Advertising and Marketing Underage Guidelines

## ADVERTISING AND MARKETING GUIDELINES TO PROTECT YOUTH

- Gambling advertising and marketing materials should not be directed to or intended to appeal to persons below the legal age.
- Gambling advertising and marketing materials should not contain cartoon figures, symbols, celebrity/entertainer endorsements, and/or language designed to appeal specifically to children and minors.
- Gambling activities should not be advertised or promoted by anyone who is or appears to be below the legal age to participate in gambling activity.
- Casino advertising and marketing should not be placed in media where most of the audience is reasonably expected to be below the legal age to participate in gambling activity.
- Where reasonably possible, casino advertising and marketing materials should not appear adjacent to or in close proximity to comics or other youth features.
- Gambling activities should not be advertised to or promoted at any venue where most of the audience is normally expected to be below the legal age to participate in gambling activity.
- Unless in response to a charitable request, clothing, toys, games, or other materials that appeal primarily to children or minors should not be given away at events where most of the audience is reasonably expected to be below legal casino gambling age.
- Participation in gambling activities should not be promoted on college or university campuses or in college or university publications. Gambling activities should not be advertised or promoted on billboards or other outdoor displays that are adjacent to schools or other primarily youth-oriented locales.

