

National Council on Problem Gambling

Guidelines for Payment Processing

Approved by NCPG's Board of Directors January 23, 2020

Excessive spending on gambling, leading to significant financial harm, is a hallmark of gambling problems. Each type of payment—from cash to credit cards—has different structural characteristics that may impact problem gambling. Innovations in payments technology and changes in consumer behavior continue to change, shifting risk and protective factors as a result.

Gambling operators, vendors, payment processors, financial institutions, regulators - and people who gamble - all have important roles to play in minimizing harm.

We call on all stakeholders to:

- encourage people who gamble to set their own limits of time and money
- deliver personalized responsible gambling messages
- allow players to self-exclude
- allow players to synchronize their exclusions with property and state exclusion lists
- research signs of problematic play
- utilize the payments data they collect to monitor performance
- develop models to help predict and prevent excessive usage

These guidelines are based on an informed consumer choice model.

Limits: Limits on payments are an important responsible gambling tool. Limits are a consumer-centric approach that emphasizes player control, information and shared responsibility. For limits to be effective they must be able to apply across accounts and types of gambling regardless of the method of payment. Research shows that limits more salient when they are set by users themselves. Providing players with information and guidance around risks and norms helps them set more meaningful limits.

- Limits on payments should be opt-out.
- Operators should encourage and even incentivize the player to set payment limits.
- Players should have the option of setting daily, weekly or monthly limits on the size of deposits.

- Players should be able to lower limits immediately.
- Players may request increases in or removal of their limits.
- Play is stopped when the limit is reached.
- After the period ends and a request for increase or removal is made, there will be an additional delay of at least 24 hours. The player must reconfirm their request for the limit to be changed.
- Limits should be periodically reviewed, with payments history and analysis of current deposits and spending projected on an annual basis

Know Your Customer: Operators should make every effort to verify identity of customers through their payment history, including a thorough age and identification verification process when setting up their payment methods.

Information: Players should routinely receive information on their payments activity; and regularly receive information on their overall activity and identifiers of potentially risky behavior. Players should have access to their account details, including:

- all deposits and withdrawals
- movement of funds between products
- bonus information
- restrictions such as exclusion events and limits
- net outcomes including total won or lost over a defined period

This information should be readily available and accessible at any time upon request.

Self-exclusion: The gambling operator should provide individual customers with the ability to exclude themselves from gambling that includes blocking of any ability of the customer to use any payment method. Players should also have the ability to block themselves from particular payment types. Payment processors, banks, credit card companies and others should have their own self-exclusion programs as well.

Research: Data on gambling deposits and other transactions that is collected by operators and vendors across the payment ecosystem should be made publicly available through the regulatory agency to qualified researchers. This metadata must be anonymized to remove personally identifying information, consistent with Federal and state privacy, intellectual property and freedom of information laws. As a condition of licensure, operators and vendors should be required to share data. During the regulatory approval process, the responsibility should be placed on regulators to provide research to show that new payments products and services do not increase gambling-related harm.

Many of these recommendations were first set out in our Internet Responsible Gambling Standards, but these payments guidelines are intended to apply broadly to all forms of gambling and guide stakeholders across the industry. We welcome feedback on these guidelines and expect to continue to refine these recommendations.