Principles for good and safe game design

When we talk about principles for good and safe game design we need to take a whole systems approach that incorporates the entire gaming and gambling ecosystem. So this covers not just the product, but also the place (such as the platform and marketing) and player.

When we think about principles, we want to these to be rooted in common sense and for them to have the best interest of the consumer at the heart of them. They should be broad enough to guide the development of most products. The industry needs to have the freedoms to build games that are engaging and exciting for all player types (within permitted regulations), so we do not want the principles to be too specific or too blunt (there might be a need for specific regulations for products).

Principles are important because it's hard for regulations to adapt quick enough to the pace of technological change. We believe that good principles for good and safe game design can ensure that industry maintains a safe and sustainable product roadmap whilst also continuing to adapt and evolve product offerings in line with new technological and creative opportunities. These principles are a starting point that will adapt and evolve as we work with a range of stakeholders to challenge and refine them and develop new insights and evidence over the coming years.

DESIGN

Default stake to be the minimum stake (where possible)
Preselection employs the default effect cognitive bias – a psychological phenomenon where people tend to go with the option that is already chosen for them, even if there are other choices available. We are aware of arguments that suggest personalisation of stake levels can improve the customer experience. We believe there is some merit in this argument, however it is simple for players to change the stake to their preferred stake for a gaming session without too much inconvenience to the customer journey. The industry should also consider how defaults can be used to help players make better decisions with regards to limit setting and depositing.

Game developers and operators should not use features that accelerate the speed and experience of playing the game
We believe that the entertainment value of gambling should combine the experience of engaging with a game with the chance of winning. Whilst the risk element is a major reason why people engage with games and gambling, it shouldn't be the only reason people gamble. By-passing the entertainment element and value of the games and events and focusing predominantly on the risk element risks reducing gambling to be become solely focused on the financial element (note that we do not consider auto-play to be a feature that accelerates the speed and experience).

Wins below the stake, anticipation animations, and near misses should be celebrated differently and in a more muted way compared with wins above the stake (if they are celebrated at all)
Good game developers are aware of the need to appropriately notify players of a win or return v. a win that is larger than the stake. Industry should not build games that include losses disguised as wins i.e., wins less than stake will not be celebrated with a celebratory animation at the same intensity as genuine wins. The same concept applies to anticipation animations and near misses.

MARKETING

Games should not target under 18s and the vulnerable

Games should clearly not target under 18s, with regards to themes and marketing. Consideration should also be given to the use of celebrity theming and promoting winning lifestyles and testimonials, particularly the impact these can have on impressionable youth and vulnerable customers.

Marketing and terms and conditions associated with games, including bonusing, should be clearly explained and not mislead players or encourage increased depositing and/or staking

Whilst regulatory advertising guidance in jurisdictions already prevents emphasising impulsiveness and urgency in marketing communications across many industries, the gambling industry should ensure that the same standards apply to in-game copy and design as the operators do to on site and marketing communications. For example, industry should not put undue pressure on players to gamble or encourage excessive gambling e.g., industry will not label or market any event-driven features, such as time-based jackpots, as 'hot'. Design patterns should also be assessed in the wider platform e.g., Are quick deposit buttons overly marketed? Are withdrawals buttons hidden away? etc.

Policies should integrate safer gambling and marketing activities

Marketing and safer gambling policies should be integrated to ensure players' welfare takes precedent over increased revenue. Whilst examples of policy integration exist at a basic level e.g., those who have self-excluded, or have recently returned from self-exclusion, shouldn't be marketed to, opportunities exist to strengthen policies. For example, players who are considered at high or moderate risk of harm should not be sent marketing offers, players who display elevated behaviour on certain markers of harm, for example increasing depositing trajectory, should not be sent deposit bonus offers, likewise, players who are displaying high levels of time on device should not be rewarded for continually returning to the site and depositing.

PLAYER EDUCATION

Games should be clearly labelled so players understand the likely 'entertainment cost' associated with games

In all forms of entertainment, whether that's going out for dinner, watching a live sports event, or going to the cinema, the consumer typically knows, roughly, what budget is required to experience the entertainment and what they are likely to get from the experience e.g., that might mean the price of the cinema tickets, the popcorn and drinks, and a taxi home, which fulfils about 3 hours of entertainment, for example. Not all gambling experiences are the same, some games last longer and others might pay out higher or more frequently. Giving players information about the entertainment value or cost of play of a game can help pick the right game for them and ensure that they have a positive entertainment experience.

Operators and game developers should offer 'reality checks' for those that win reasonable / substantial bonuses / jackpots

For example, a reality check would be "congratulations on your win, remember you are unlikely to win this again in the near future...". The rationale behind this principle is that players who win have actually won real money and operators should not assume player wins are 'house money' i.e., money that the player will recycle back with the operator (and eventually lose). It's not for anyone to decide how a player chooses to spend their winnings. However, reminding them they are unlikely to experience such a win again in the near future might nudge them to make a financial decision that is better for them. This in turn could help retain the player as a satisfied, long-term customer.

Game concepts and features that are frequently used should be explained in a simple and consistent manner

It would be helpful for the major key concepts of games, for example Return to Player (RTP) or Hold, to be explained simply and clearly in a consistent manner across games. Research suggests players struggle to understand how these concepts work in reality. Other possibilities include standardising terminology for major gaming verticals, for example with slots, this could include terms like wild, free spin, scatter and bonus. We recognise that this is a complex area, with many different games and terms used across multiple supplier sand operators, however reinforcing simple and standardised concepts can help players better understand the products regardless of where they engage with them. The gambling industry needs its own PEGI system.

SAFETY AND EVALUATION

Every gambling product should be assessed for safety risks with associated risk mitigation actions identified and implemented

Industry should develop methodologies and approaches to assess any safety risks associated with games. Any product safety approach must be undertaken within the wider gambling ecosystem and consider how the player and place interact with the product – we call this a whole systems approach. It's not acceptable to state the existing methods are too blunt to do this effectively or that the evidence doesn't exist. If this is the case, then more sophisticated methods need to be developed, backed up with evidence. If this is not undertaken, the industry can expect greater regulatory restrictions in future.

There should be periodic evaluation of games v. potential harms e.g., new features, the impact of safety mitigations implemented, exploratory research, etc,

It should be considered best practice for any new changes to games and platforms to develop an evaluation plan to assess the impact of the changes within 12 months of the deployment of that change. Industry cannot test everything so there will be a prioritisation, most probably based on existing evidence. Without testing the impact of games on player behaviours and harms, how can industry have the confidence that players are not experiencing harms as a result of a contribution from a product or feature? Given the complex interactions of player, product and place, this is not easy, but that's not an excuse to not do it.

Evaluation should, where possible, be independently scrutinised, be transparent and published, and undertaken with support from wider stakeholders

For all of the above game features and platform changes, game developers should work collaboratively with operators to develop evaluation plans to assess the impact of the changes. Such assessments should include independent oversight of the methodology and the results should be made public. The gold standard is peer-reviewed research – this is achievable but is hard and time consuming, so not everything will be able to go through this cycle. Working collaboratively and respectfully with a variety of stakeholders, who have different but relevant experiences and expertise, can only help strengthen such evaluations. Unless product safety evaluations are made public, how can wider stakeholders have confidence in them? Every stakeholder has biases, transparency helps understand where they could be and what has been done to mitigate them.

CULTURE

Games designers should undergo safer gambling training and understand the range of factors that can lead to harms in the context of the player, product and place

We believe there is value in game designers understanding the bigger picture of the industry and effects that gambling can have on vulnerable players. Training should be focused on the intersection of player, product and place, with an understanding of the key research and impacts the product can have on player experience e.g., cost of play, speed, continuity, structural characteristics, and wider platform features (including marketing practices). Cultural change within the gambling industry is critical and that must start from the leaders who make the key decisions on how products are developed and marketed to players.

Management should consider a wider range of remuneration schemes to reward game designers that are not solely focused on game GGR

In a highly competitive industry, like gambling and gaming, it is challenging to not use revenue as the only relevant KPI (key performance indicator) to drive remuneration. However, we encourage executives to look at other elements of performance that can contribute to the development of a sustainable industry. These could include, for example, completion of safer gambling training, the results of game evaluations, and other DEI aspects.