

Senet Group response to October 2017

Consultation on proposals for changes to gaming machines and social responsibility measures

The Senet Group welcomes the opportunity to respond to the Department for Digital, Culture, Media and Sport Consultation published in October 2017.

The Senet Group works to raise standards through the commitments made by our funding partners and others, by promoting best practice and through a sustained campaign of responsible gambling messaging. Our campaign work is designed to prevent problem gambling by reaching and influencing the behaviour of those who gamble with some regularity. Our work is wholly aligned with the objectives of the review and Ministers' wishes to protect those who may be vulnerable to harm through their gambling activity.

This response focuses on our achievements with responsible gambling messaging and looks at where we believe more needs to be done, particularly by the sector itself working collectively, to make services safer and fairer. Today, surveys show over 80% of players are aware of the messages and tips in the Senet Group's responsible gambling campaign and it seems clear these have resulted in millions of players changing their behaviours and millions of others feeling more confident to raise gambling issues with a friend or family member.

Our response sets out a new and more inclusive approach we believe will allow us to deliver more against a wider agenda and in ways that addresses the Government's call for an increase in the pace with which social responsibility activities are delivered. As with our reply to the original consultation document in October 2016, this reply focuses on the issues relating to social responsibility; particularly issues around advertising, preventing harm with online services and the ways in which operators and others can demonstrate social responsibility through actions as well as funding for relevant activities.

We welcome the increased focus on online gambling in Sections 5.10 - 5.39 of the 2017 consultation. This was an issue that was central to the Senet Group response to the original consultation in which we highlighted the importance of preventative action, particularly in relation to younger players in the 18 - 24 age-category where past research has identified a significantly higher proportion of problem-gambling relative to the generality of players.

Sector developments and online and mobile services

Q12. Do you support the package of measures to improve player protection measures for the online sector?

Yes. And we would offer the following supplemental comments:

Supporting this package should not be seen as agreeing this as the de facto limit to the work that might be done to improve player protection. It is right to identify key issues where the Government expects the sector, the regulator or others to deliver. But this should not become any form of cap on the thinking that happens or our ambition to build trust and confidence amongst players and the public at large. We think it important the approach to legislation, regulation and interventions stimulate, rather than dilute the sense of ownership and responsibility the sector itself has for making services safer and fairer and encouraging moderation and good sense when customers use their services.

The responsible gambling messaging and the decision of operators who were funding partners of Senet Group not to market certain products or to use particular marketing offers in advertising for new customers, highlights the fact the sector itself has the capacity to act individually and collectively to implement best practice. The Commitments given by Senet partners when we launched are set out below.

Senet Group Partner Commitments

1. Offers that are exclusive to new customers (including free bet and free money sign-up offers) may not be advertised on TV before 9pm, mindful of children and young people watching.
2. Gaming machines must not be advertised in betting shop windows.
3. Twenty percent of betting shop window advertisements must be dedicated to responsible gambling messages.
4. Twenty percent of the total area of all TV end frames, or an equivalent, must be dedicated to responsible gambling messages.
5. Ten percent of the total area of all press adverts must be dedicated to responsible gambling messages.
6. All web and social applications must carry prominent responsible gambling messages, including messages on the homepage of major social media sites.
7. All players on gaming machines must be given the option to set time and money limits at the start of their gaming session.
8. All social media channels must carry regular stand-alone Senet Group advertisements.

Paragraph 5.32 of the consultation notes: *“While we welcome the positive industry led initiatives outlined above, we also note concerns expressed by the Gambling Commission that the pace of change by the industry to enhance the measures currently in place to protect consumers and promote responsible gambling has not been fast enough.”*. In relation to a suite of actions Paragraph 5.33 says *“We expect the industry to accelerate its work wherever possible....”*.

There is reference in Paragraph 5.23 to phases of research on harm minimisation concluding sometime in 2019. Elsewhere the Government welcomes steps taken by some operators to incorporate behavioural analytics into their responsible gambling systems alongside the Commission’s work to raise standards across the sector.

Our view

We have been party to collective work with GambleAware, the Industry Group for Responsible Gambling and others on player messaging and we continue to support the plans to pilot forms of intervention and to use the Behavioural Insights Team or others to test different techniques when engaging with those who are or who are at risk of being problem gamblers.

But, as with other issues, we believe there is a need for the sector to build its sense of ownership of these matters. We are, therefore, exploring ways in which the Senet Group and others can work together to share, develop and disseminate best practice across a range of issues.

We want, in particular, to support the Gambling Commission and others by actively facilitating discussions with the sector on possible common algorithms and intervention trigger points that could

be trialled in 2018 by a coalition of leading operators of online gambling services. The DCMS consultation recognises the shift in play to online services and other research has highlighted the higher incidence of problem gambling amongst younger players.

There has been independent research by PwC into possible “markers of harm” alongside innovation within every operator business and through game manufacturers and others who have developed proprietary products that track player behaviours as an aid to intervention when risks are apparent. We do not propose to duplicate this activity but believe there is a need to look at ways in which we might accelerate thinking and action on a common approach.

Any trialling against common algorithms and intervention triggers would allow operators to test the frequency with which interventions are made, the appropriateness and timeliness of the interventions made and share experience in terms of the comparative effectiveness of their different individual techniques when engaging with players when an intervention is made.

Using good practice to raise standards incrementally can inform, rather than challenge, any research work and finds that might be delivered in 2019 and future LCCP related consultation by the Gambling Commission on identifying harm and making interventions (see Paragraph 5.25).

We believe arrangements for monitoring player behaviour and techniques in intervening to prevent harm will be evolutionary in nature. We see merit in the sector stepping forward and playing a lead role in getting practical work under way in the expectation that current and future research will allow us to build on what has been done. This approach could address the Government’s call for an acceleration of work on social responsibility measures.

This approach reflects a general and strategic concern that the sector should continue to have a real sense of ownership and accountability for the social responsibility agenda. It would be a backward step if the industry feels it can, should or must cede the thinking and innovation on such matters to third parties.

Enhancing Player Protection

Paragraphs 5.26 and 5.27 set out forms of tools operators must provide to players on how to gamble responsibly.

The Senet Group has been active in promoting responsible gambling tools within our programme of player messaging. We have been working on other initiatives that are nearing conclusion that are wholly in line with the Government’s wish to enhance player protection. These are set out below.

Player empowerment

We know a significant proportion of players and the public at large continue to see a case for further regulation. But, when pressed on their views on what should be done, many of those we surveyed expressed a marked preference for actions that inform and empower them as users, rather than uniform controls on what they are and are not allowed to do.

Recent qualitative and quantitative research work for the Senet Group found high levels of player support for mechanics that gave players the ability to track their spending and “account” information, for arrangements that give players the ability or obligation to set deposit limits and for tools to test what is affordable. Players also agreed operators should have the ability to monitor behaviour to inform interventions. These views seem to mirror the ways in which the public expect to be informed and assisted as they manage others forms of accounts, banking included.

Having tools is one thing: making them accessible, of interest and used is another. At present there is a mis-match between the significant player interest in responsible gambling tools when these are explained and the currently low level of awareness and take up. Between 25% and 41% of the gamblers surveyed for Senet Group were aware of responsible gambling tools, with awareness of deposit or spend limits at 41% and awareness of reality checks on time spent in play at 25%. Between 3% and 6% of players had used one or more of these tools.

That level of take up might seem understandable given the data on the percentage of the population who may be problem gamblers. We do not think this is the right interpretation or grounds for complacency. Our goal, and that of our partner companies and entities, is to prevent harm. Given the value players attach to these tools more needs to be done to promote their availability and use. And this needs to be done in ways that normalise these tools and their use as common sense practices rather than a response to a perceived failure on the part of players. Accordingly:

- **The Senet Group has prioritised online player messaging and, specifically the presentation of responsible gambling tools. We will produce best practice guidance on this by June 2018.**
- **The Senet Group plans to work with game designers to explore how and when responsible play messages might be incorporated into games, particularly those that seem particularly attractive to at-risk players.**

Addressing the behaviours of younger players online

The concern we expressed in 2016 over younger players online has been reinforced by the continuing trend towards online gambling and the higher than average percentages of problem gambling in the 18 - 24 and 25 - 34 age groups.¹

We understand there is a limit to what can be extrapolated from public health surveys as you drill down into sub-sets of limited size, but the public health survey read alongside other findings and the data in the DCMS report highlights issues which need to be considered collectively:

- There is evidence some forms of online gambling are used by players with a higher likelihood of being problem gamblers;
- there is evidence younger players, who are more likely to be online players, are likely to have a high number of separate gambling; and
- the data suggests we have a significant “at risk” community of players who could become problem gamblers in the absence of changes in their circumstances.

Any distinct risk with younger players may be addressed in part by work on common markers of harm and how these prompt targeted interventions. That should be valuable but is a process that addresses potentially harmful play, rather than working to minimise the risk of this happening in the first place.

- **The Senet Group and partners will work in 2018 to draw together best practice when dealing with young players when they join and use services. This will include the material and the nature and tone of messages players generally, and young players in particular, get when joining a service for the first time.**

¹ <http://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Levels-of-participation-and-problem-gambling/Gambling-participation-and-problem-gambling.aspx>

Q13. Do you support the package of measures to address concerns about gambling advertising?

Yes. We support the package of measures set out.

The Senet Group is a core partner in the planned campaign of public awareness and player messaging and our efforts over the last three years have already secured high levels of player and public awareness of core responsible gambling messages, and also positive behavioural changes from players and their family and friends.

Advertising practices

We believe the process of consultation has been valuable in drawing together trends in terms of advertising activity, the advertising viewed by children and research into the impact or otherwise of advertising on the generality of players. In the absence of evidence of harm in terms of aggravated problem or under-age gambling behaviours we think the Government is right to encourage the completion of research on whether the volume or tone of advertising influences young people's attitudes to gambling (at 5.88 and 5.89).

We think it right to reflect on whether strong calls to action result in any measurable increase in problematic play. The consultation flags the inconclusive research to date on this matter, suggesting any impact might be limited to existing problem gamblers and that the causal element was unclear. In considering this further it is right to recognise the fact that gambling is now an "always-on" option: that, online services and innovation in sports and other betting means there is a continuous availability of services that did not previously exist.

Against this there is the need to recognise that whole and wholly legitimate purpose of advertising is to prompt consumer interest and actions, and that this is not an issue if those actions are not harmful. Finally, there is the need always now to reflect on how any action in relation to broadcast advertising sits in an increasingly multi-media world.

Responsible gambling campaign

- **The Senet Group continues to support the proposal for a significant sustained responsible gambling campaign.**

This is an important activity where Senet Group has played the lead role for the last three years. Since 2015 Senet Group has invested over £4million on advertising and distributing educational messages. These are designed to inform players and their family and friends of the need for moderation and an awareness of risky behaviours in order to prevent gambling behaviours becoming problematic or harmful.

The investment, which has been recognised in parliamentary answers, has funded in excess of 7,000 television advertising spots as well as national and local print advertising alongside an increasing focus on online advertising and use of social media.

Senet Group reported in November 2017 on the most recent survey findings by Bilendi into the reach and effect of the campaign under the broad "When the Fun Stops, Stop" message. These have been made available to the DCMS and can be seen at <http://senetgroup.org.uk/responsible-gambling-campaigning-works-sustained-consistent-tuned-audience/>

The research found that over 80% of regular gamblers and over 50% of all adults surveyed were aware of the overall campaign. Awareness of most individual "tips" was even higher.

There is high awareness for the main responsible gambling 'tips' - especially amongst regular gamblers

Awareness of 'tips' for responsible gambling amongst regular gamblers

	Mar '17
Set your limits at the start	87%
Only bet what you can afford	84%
Never chase your losses	76%
Don't bet if you're getting angry	68%
Never put betting before your mates	52%

Awareness of 'tips' for responsible gambling amongst all adults

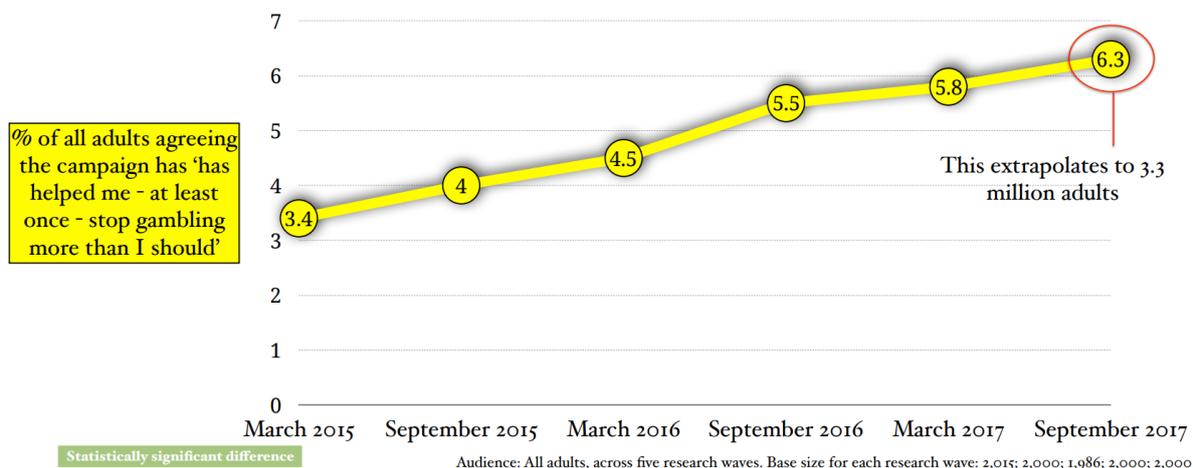
	Mar '17
Set your limits at the start	77%
Only bet what you can afford	84%
Never chase your losses	76%
Don't bet if you're getting angry	68%
Never put betting before your mates	52%

Audience: All adults. Base size: 2,001. Regular gamblers: 468

Alongside reach the campaign has had measurable impacts in terms of behavioural change:

- 11% of the adults surveyed said they had been prompted to warn others about their gambling in some way;
- 23% of the problem gamblers surveyed said the campaign had made them gamble more responsibly; and
- 18% of players said it had helped them, at least once, to stop gambling more than they should.

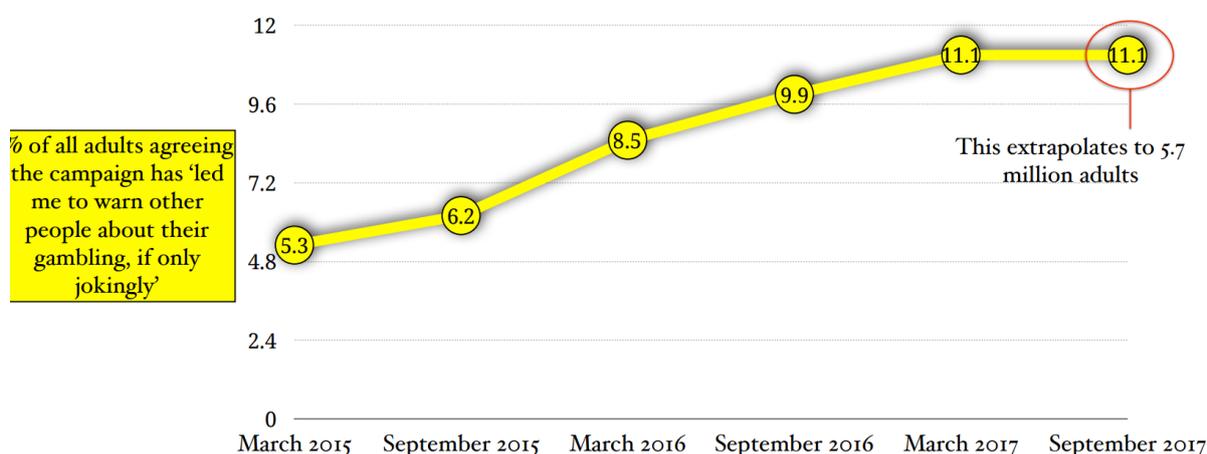
There has been a consistent increase in the number of people who have stopped gambling more than they believe they should



We believe the continuous deployment of messages in a consistent format and the conversational, rather than condemnatory, tone is important in getting messages across and getting players to act on these messages. Another critical aspect is the harmonisation of stand-alone messages in Senet Group advertising and messaging with identical responsible gambling messages our partners commit to including in their own advertising and messaging, on television and radio, in print, in every retail outlet and on every website.

This, for us, highlights the importance of partnership with the sector in delivering messages and in developing fairer and safer services. These are not activities that should or could be prescribed and managed centrally or by third parties.

The number of people warning others about their gambling, ‘if only jokingly’, has remained consistent



We would want all the elements of the proposed joint campaign to be complementary. We would hope any new public awareness campaign messaging would be in harmony with our player messages on setting limits, only betting what is affordable, not putting gambling ahead of family and friends and not chasing losses or betting when angry.

Indeed, our progress to date in terms of awareness and behavioural change suggest there could be advantage in building on the material that already exists and our experience in placing broadcast advertising and using online advertising and messaging to reach younger player audiences.

We are clear, however, that the light and conversational tone which has worked with the generality of players with gambling problems is not appropriate in messaging activity that is targeted specifically at problem gamblers.

We have referred to Senet Group taking a more inclusive approach to raising standards and promoting responsible gambling. To date the use of the “When the Fun Stops” script and promotional materials has been limited to our funding partners. Given the changes in hand we want to make all such material available to all:

- **The Senet Group is lifting all restrictions on third party use of our responsible gambling portfolio of content. We are making all existing “When the Fun Stops, Stop” messaging content, all the subsidiary messages, including new messages promoting the use of responsible gambling tools, “gifs” and our online material and TV content available for use by any and all operators in the UK and any other agencies that seek to encourage moderation and sense when gambling.**

Funding Research Education and Treatment (RET)

Q14. Do you agree that the Government should consider alternative options, including a mandatory levy, if industry does not provide adequate funding for RET?

We think it right that the Government keeps the arrangements for delivering these core activities under review. The work of GambleAware as a commissioner of research and treatment is a central consideration when considering the adequacy of funding for these two activities in particular.

We are pleased the Government also recognises the commitment made by the sector through education work carried out by Senet in terms of informing and influencing player behaviours and by YGAM and others in building a better understanding of gambling and its associated risks for those at and under the age where gambling is legally permissible.

Under current arrangements licence holders have choice in how they may wish to make the commitment expected of them in terms of funding socially responsible RET activity. Parliamentary answers record the £1.7m spend via the Senet Group work in 2017 and the various contributions operators make direct to charities that deliver RET. As a member of the proposed joint campaign of public awareness and player messaging, we expect to make a similar contribution in 2018.

The need for alternative arrangements and a statutory levy

The Government consultation document welcomes the progress made to bolster the current voluntary arrangements and delivery of the Responsible Gambling Strategy. The Government calls on the industry to step up to fulfil their duties under these arrangements and for arrangements to be scalable.

We understand the Government's resolve to introduce a mandatory levy to meet the RGSB targets if the funds are not forthcoming under voluntary arrangements and to act if the current system is unable to deliver on the strategy.

- **The Senet Group would support a move to a statutory levy if it becomes clear this is the only assured way of generating the funds and managing their use to meet the objectives set.**

We do, however, recognise this has considerable implications if a levy process was to shift financial and operational responsibility to the Gambling Commission and/or to the RGSB.

Throughout this response we have highlighted the importance of mechanics that strengthen the positive relationship operators should have with their customers if services are to be enjoyed without harm. We would hope that the arrangements for supporting essential research, education and treatment are consistent with this philosophy.

- **If there is a move to a statutory levy it would seem important to focus on the core deliverables and to apply it in ways that continue to recognise operator investment in activities that inform, educate and empower players to use services safely and with moderation or gives the Gambling Commission or any designated entities the option of continuing to work with current providers with an established record of delivery.**

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