

DEVELOPMENT OF A NEW NATIONAL SAFER GAMBLING STRATEGY - SENET GROUP RESPONSE TO THE CONSULTATION

Questions 1. to 7. [ORGANISATIONAL DETAILS]

About the Senet Group

This submission is made on behalf of Senet Group and supported by its Funding Partners.

The Senet Group is a not-for-profit body focused solely on promoting safer gambling through facilitating industry collaboration, raising industry standards, developing and promoting best practice and supporting prevention of gambling harm through high profile player education and awareness campaigns. We work to raise standards and prevent problem gambling through developing and sharing guidance and best practice material that will be freely available for use by all operators.

With independent participation at Board level, the organisation's sole purpose is to advance the responsible gambling agenda. Senet is supported by Funding Partners¹ who are committed to the Senet Group agenda of raising standards, increasing collaboration on safer gambling, prevention through education and building a culture of continuous improvement.

Question 7. and 8. What are your experiences of the current National Responsible Gambling Strategy

- There was much to commend in the 2016-19 strategy and particularly the focus on a highly collaborative approach with businesses. This has helped to encourage more joint working and is a strong foundation on which to build the next strategy.
- The strategy has driven new safer gambling initiatives and more effective sharing of best practice. Many good examples are beginning to emerge. These include² industry collaboration days; data sharing pilots such as Senet Group's work to identify a common set of metrics to identify problematic gambling; guidance on marketing affiliates; development of multiple operator self-exclusion schemes³; and industry-wide sharing such as Senet waiving copyright restrictions on 'When the Fun Stops, STOP' campaign to make all materials freely available to all operators.
- However, twelve responsible gambling priorities were difficult to manage, and this may have contributed to a loss of focus and momentum for the strategy.
- Senet Group sits on the RGSB Strategy Board and we support the RGSB's view that it has been challenging to measure and track the success of the existing strategy. The evaluation has broadly relied on subjective reporting and it is vital that the new strategy defines clear outcomes, including action plans with measurable progress indicators from the outset. These plans should be developed in collaboration with all partners and we support the view that this is a Year-1 priority.

¹ Aspers Group; Caesars UK; Genting UK; GVC (LadbrokesCoral); PaddyPower Betfair; Sky Betting and Gaming; Rank Group; Scotbet; William Hill;

² See also Senet Group's submission to the Year 3 Progress and Achievements Report National Responsible Gambling Strategy 2016-2019

³ <https://self-exclusion.co.uk/> <https://www.gamstop.co.uk/>



Question 9. “THE APPROACH” What are your views on our overall approach to the strategy from defining the problem through to ensuring the widespread adoption of good practice?

- Senet Group and our Funding Partners fully support the aim of the strategy to reduce gambling harms and are committed to working in partnership with the Commission to deliver that aim.
- The approach as set out is clear and the framework is broadly sensible.
- However, an additional stage should be built into the framework to “*Identify the Desired Outcomes*”. This will ensure there is a shared and collective view of what we are trying to achieve from the outset. Without these clearly defined outcomes it is difficult to assess progress on delivering the strategy or focus collective action.
- Suggested Framework:

Define the Problem
Identify the Desired Outcomes
Identify risk and protective factors
Develop and Test Prevention Strategies
Ensure widespread adoption

Definition of Harms

- There has been important work done in this area by Wardle et al and we note the intention to use the definition as set out <https://www.gamblingcommission.gov.uk/PDF/Measuring-gambling-related-harms.pdf>
- We support the authors’ views that this is a challenging area and one where further work is required. It may be helpful to note the extensive work at national level in other sectors to distinguish between broad and narrow measures of product-related harms. Too wide a definition can be problematic and make it difficult to assess the causal impact of a harm reduction strategy due to other correlating factors and co-morbidities. There may be developments in other sectors that could also be helpful in this regard: <https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-alcohol/2018/part-1>
- There is an opportunity to explore using existing regional data sets to include gambling harm data to enable better local targeting of resource. See Public Health England’s LAPE data as an example: <https://www.gov.uk/government/statistics/local-alcohol-profiles-for-england-february-2018-update>
- The majority of psychological research into problem gambling emphasises the importance of the individual in feeling they can personally take control of their gambling, and care should be taken that the new definition does not detract from the importance of this. We would encourage the strategy to seek the views of organisations that provide treatment and support to problem gamblers in this regard.



Other

- Senet Group has commissioned Revealing Reality to conduct qualitative behavioural research insight to better understand the motivations, controls and tools that can help people to stay in control of gambling. We will share this research with the Commission and it will be used to inform future work.

Question 10. Do you have any views on what should be prioritised under a new national strategy?

- We support the approach that businesses are vital in delivering the new national strategy and will need to be engaged across all the pillars.
- However, identifying priority area 5 ‘Gambling Businesses’ is out of kilter with the theme-based approach of the other four pillars. There is an inherent risk that this will create an artificial barrier within the strategy when the desire is to have multi-sector partnerships working collectively towards a common goal.
- Therefore, we suggest that pillar five could be renamed *Collaboration* to fit with the overall themed approach. This would also help to reinforce the message that operators and suppliers need to be focused on all aspects of the strategy and that collaborations and partnerships will be important in delivering the desired outcomes of the strategy.
- The current strategy defines the risk factors to gamblers as being personal, situational and structural. Two of those would be potentially lost under the new proposal. We believe this structure is a useful way of categorising the different areas in which responsible gambling efforts might be focused and should be retained in the new strategy.
- For example, while we agree that sole responsibility to reduce gambling harm should not rest on the individual, we believe player and young people’s education, tools and personalised safer gambling strategies must remain a core part of an effective prevention programme. Promoting responsible and in control gambling and showing what good looks like remains important.

DETAILED COMMENTS ON PRIORITY AREAS

Question 12. Research to inform action

- Under the current strategy, Senet Group convened a pilot data collaboration to develop a common set of common metrics to identify potentially harmful patterns of play (markers of harm).
- This pilot has brought together expertise, insights and behavioural data from five online gambling companies to develop a minimum standard model that can be shared with operators across the industry to help identify potential problem gambling at the earliest stage.
- Using guidance produced by the Remote Gambling Association and the Gambling Commission, and combining it with insights from their own in-house systems, and publicly available literature, including the PWC report on markers of harm, the companies have collaborated to produce a “1.0” threshold-based model that can be incorporated by any operator into existing or new online behavioural tracking programmes to identify and engage with customers exhibiting signs of potentially problematic gambling.



- Senet Group does not intend this to be a static model. In collaboration with its industry partners, and in line with rapid and ongoing developments in machine learning approaches, Senet Group plans to lead a process based on on-going testing and evaluation that constantly evolves this model.
- This project has been a helpful road map to develop data sharing protocols and work through the complexities of multi-operator data collection and standardization. We will share the findings of this pilot and related learnings with the Commission in March and through the upcoming LCCP consultation on customer interaction. This will help to establish tested protocols and processes from cross-operator data sharing pilots.
- A data repository or research hub may be a good solution to establishing common standards of data integrity across the industry, and in reinforcing the Commission’s confidence in that data. However, the complexity of delivering a data repository in Year-1 should not be underestimated, and we would have the following observations based on our experience with the markers of harm pilot:
 - The comparability of data is something that will have to be continually resourced and scrutinised. There are innumerable ways in which the true comparability of data can be compromised at a macro and micro level, leading to potentially inaccurate research results and conclusions. The role of the operators and their in-house data scientists in preparing the data thereby assisting researchers in highlighting inconsistencies and anomalies will be critical.
 - We would suggest that data requests made to operators are targeted to specific research objectives and outcomes, enabling operators to ensure that data submitted is as free from anomalies as possible to aid true comparability. The alternative, which is unstructured data for indeterminate purposes, is much more likely to lead to wasted research resource and inaccurate conclusions.
 - We believe a data repository should be accessible to operators just as much as researchers, as there is significant value in industry operators being able to compare their performance in the responsible gambling space with other companies.
 - Senet Group Funding Partners and other operators have their own academic programmes – (e.g. BetBuddy, Playtech with City University; and GVC working with Harvard). RGA and ABB are also working on affordability and player messaging pilots. A Year-1 Priority to capture and assess all this existing work would be a good starting point and would provide gap analysis to help prioritise the next key areas for data collaboration. Senet would be pleased to support the co-ordination of this.
 - Regulatory oversight of data supplied will be important, not only to comply with issues of privacy under legislation such as FOI and GDPR, but also to ensure that commercial interests are protected and compliant with competition law.
 - There are numerous examples of data sharing from other industries such as the pharmaceutical sector, that we believe the Commission can look to and learn from in the design and execution of a data repository. In all instances that we are aware of, these facilities have been established with specific goals in mind.
 - A data repository will provide a useful academic resource, but it will not be capable of replicating the conditions present in a live gambling environment, and for that reason there should remain a focus on continued primary research and specific pilots. Identifying behaviour changes triggered by small changes in product design, in customer messaging or other forms of intervention will still have to be conducted at operator level.



- There are other areas of the gambling sector which would also welcome involvement in the design and execution of a data repository, such as the Anti-Money Laundering Group.

Question 13. PRIORITY AREA 2 PREVENTION

- The Senet Group fully supports the focus on reducing gambling harm for children and young people as well as other vulnerable groups.
- We support the view that gambling businesses have a role to play in assisting the Commission to deliver the prevention element of the strategy and would support clarity on where operators should focus effort.
- Operators will have a key role in preventing gambling-related harm on the front line through direct access to customers. Whether through personal interaction in retail environments, or through the use of data to identify harmful play online, companies are now developing protocols, IT systems, training programmes and trialling technology to significantly improve the identification of harmful play, and to enhance the effectiveness of customer interventions. The insight and experience of staff within the industry should be a valuable resource on which the Commission calls in the implementation of its new strategy.
- We would also encourage the strategy to look at facilitating and encouraging wider strategic partnerships. From banking and consumer groups to educational organisations, youth groups, GPs, Citizen’s Advice Bureaus and parents, the ability to design and implement a prevention programme with consistent advice and signposting to support and treatment where necessary, is considerable.

Children and Young People

- The most common gambling activities that 11 to 16-year olds spent their own money on in the past week are placing a private bet for money with friends (6%), followed by playing National Lottery scratch-cards (4%), fruit/slot machines in an arcade, pub or club (3%) and cards for money with friends (3%)⁴. Parents and educators are essential in building the knowledge and resilience of young people before they reach the legal age for gambling.
- There are now good examples of positive control messaging to players, but very little guidance is available to parents who want to talk constructively to their children about gambling. Giving parents and educators the tools and confidence to talk about gambling should feature in the prevention element of the strategy.
- It is known that education programmes that solely focus on single issues or harms are not as effective as prevention strategies that are built into wider life-skills and resilience programmes. Senet Group has commissioned an expert in this field to conduct a scoping paper to begin a process of identifying how risks associated with gambling and building a resilient approach might be most effectively incorporated into existing PSHE schools-based programmes, alongside drugs, alcohol and other life-skills modules. This is due to report in Spring 2019 and we will share the findings with the Commission.

⁴ <https://www.gamblingcommission.gov.uk/PDF/survey-data/Young-People-and-Gambling-2018-Report.pdf>



Question 16. PRIORITY AREA 3 TREATMENT

- Operators have a clear responsibility to help identify problem gamblers, and wherever possible direct them to the services and resources that can help them. With millions of customer interactions every year, often with people known to them, trained staff can support access to treatment services.
- Many operators are already helping to connect customers to treatment services through microsites, player information and by actively promoting available support and tools (such as GambleAware, GamCare, self-exclusion schemes and the National Gambling Helpline). In this respect, removing as many of the friction points as possible between a customer experiencing harm and receiving help, are key. We suggest the following opportunities:
 - There is scope to capture best practice on presenting and signposting treatment and support consistently for players. Senet Group will work with leading accredited providers to identify and disseminate best practice guidance for operators in this area.
 - There is also an opportunity to look at wider strategic partnerships and to better understand co-morbidities and links between gambling and other harms such as debt and mental health so the new national gambling strategy builds on existing good practice in other treatment provision and other addiction services.

Other points:

- We note this discussion paper refers to only 2% of problem gamblers receiving treatment, but this figure might significantly under-estimate the treatment being received as it only captures treatment commissioned through GambleAware. There are many other organisations providing treatment of different kinds, from addiction centres to Church groups. Mapping the different treatment providers and the range of different treatment services on offer is an important first step in identifying gaps and determining what an effective and comprehensive national provision should look like.

Question 18. PRIORITY AREA 4 EVALUATION

We note the Commission is looking for feedback on the Evaluation Protocol developed by the RGSB <https://www.rgsb.org.uk/PDF/Evaluation-protocol-April-2016.pdf>

- This protocol is welcome in terms of broad principle based good practice. However, we would concur that that this framework has yet to reach its full potential.
- There has been too little evaluation of projects in the gambling industry in recent years, and that what evaluation has been conducted has often been inconsistent and in varying degrees of quality. However, this has been exacerbated by the absence of clearly defined and measurable outcomes as referenced at the beginning of this response. If the industry can work towards a national strategy's shared and common objectives it will be easier to evaluate and identify progress.
- We broadly agree that the Year-1 priority is to disseminate and embed the use of the evaluation protocol. We believe this would be more effective than a central co-ordination evaluation body which would be cumbersome and costly.



- We welcome the increased moves by operators to share information and collaborate about different approaches. Senet Group can help to facilitate these discussions working with other partners and to promote the evaluation protocol.

Question 20. Do you have other comments on PRIORITY AREA 5 – GAMBLING BUSINESSES

- We strongly support the proposed Year-1 actions to ensure that efforts of the gambling industry are coordinated through targeted collaboration and focused on safer gambling.
- However, while collaboration is a clear priority, we would caution against making the collaboration process overly bureaucratic or ‘owned’ by the regulator. This would defeat the purpose of effective industry collaboration. We believe the new Strategy can help to support more effective collaboration by setting clearly defined outcomes and priorities and make clear the challenges it wants industry to address. Industry can then focus on how best and most practicably these solutions can be delivered. A Year-1 priority for Senet will be to facilitate better collaboration networks across the industry. The Senet Group CEO’s Forum and Data Scientists Task and Finish Group on markers of harm are good examples of how this can work in practice.
- To this end, Senet Group is in discussions with its Funding Partners and other operators, trade associations, industry groups, and charities to scope out a long-term business-led safer gambling strategy, focused on collaboration and fully aligned with the Commission’s ambitions for a new national strategy. The aim is to identify key deliverables from business and work with the Commission to embed these into the 3-year strategy. We would be pleased to discuss this further with the Gambling Commission to support the implementation and action plan.
- One of the biggest contributions the industry can make to addressing gambling related harm is in supporting customers to stay in control through information, education and improving the consistency and availability of effective tools. Senet Group and its partners consider this a key priority for Year-1 and will support the strategy in researching and testing what interactions and interventions are most effective.
- Operators also have a key role to play in supporting prevention and education programmes through accredited providers such as GamCare, YGAM and others. There is a good opportunity under the new strategy to design large scale programmes with multiple delivery partners which businesses can support through RET contributions (see also Question 23.). Senet Group is facilitating discussion on how these large-scale programmes might be developed.
- Another key area of current and future industry focus for the industry is in game design, game labelling and the development and personalisation of tools to help people manage their time, money and information about their gambling. Senet Group and its Funding Partners also consider this as a key priority for the business-led element of the new strategy. Year-1 priority is to commission a review of different approaches and their effectiveness with a view to sharing best practice in this area.

CONSULTATION ON LCCP RET FUNDING

Question 23. Do you broadly agree with the proposed change to our requirements to give clarity to operators on where contributions made under the LCCP requirement may go?



Key points

- We recognise and welcome the intent to provide greater clarity for operators on meeting their LCCP requirement and broadening the ability of other partners to deliver key elements of the new strategy. The speed of delivery under the current strategy has been too slow and widening the number of partners who can deliver is vital to the success of the new strategy.
- However, there is an inherent risk that this “approved organisations” only approach could become a barrier in itself to delivering the new strategy if too few organisations meet the independence test.
- Therefore, we strongly recommend that the Commission takes the opportunity to widen the RET scope away from just ‘organisations’ to include ‘*RET projects, campaigns or programmes*’ that are clearly defined, adopt the evaluation protocol and will deliver outcomes set out in the new strategy. This would unlock huge potential to get large scale programmes designed and implemented with multiple delivery partners rather than creating bottlenecks and pressure on too few organisations.
- This approach would also help to harness operators’ own innovation funds in a structured way to support delivery of the new national strategy.

Other points

- Senet Group as a not-for-profit company registered at Companies House, has oversight via independent Board directors and is further reviewing its governance arrangements to achieve a fully independent Board. As an organisation in receipt of RET funding we welcome the opportunity to discuss the proposed approach to qualification process in more detail with the Commission.
- Many charities also receive a high proportion of funding from private sector businesses and the Commission should be careful not to dual-regulate with the requirements of the Charities Commission which already set clear rules and protocols on independence and governance which should satisfy the RET approval process.
- The independence test is also at risk of establishing an ideological divide in the industry, where funding direct from industry operators is in itself considered an unacceptable source of influence, whether this is codified in the new Conditions or not. This effectively creates an internal contradiction in the aims set out in the Discussion paper, in that the proposals are designed to create clarity on what organisations can be funded, but if the industry offers them funding they would be unable to accept without jeopardising their approved status. This could impact smaller charities particularly hard and recreate the problem that there are too few organisations approved to effectively deliver a national strategy at scale.
- In summary, if RET approved is set too prescriptively, it will effectively reduce or potentially eliminate funding for a wide range of organisations, programmes and initiatives that rely entirely or partially on the industry for money, resources, skills or time. This will have serious unintended consequence of stifling important areas of safer gambling innovation and expertise. This would be high risk to the successful delivery of the new strategy.

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