

1 September 2023

██████████
Chair, Betting and Gaming Council

By email: ██████████@[BettingandGamingCouncil.com](mailto:██████████@BettingandGamingCouncil.com)

Dear ██████████

Clarification regarding GamProtect

Further to our call on 9 August, I agreed to follow up on a couple of matters relating to your multi operator risk sharing solution, GamProtect.

Commission colleagues have confirmed, as I thought, that at no point did we stipulate that you onboard a further 15/Cat B-only members. Rather, we have consistently asked when you will be onboarding your full remote membership. ██████████ and ██████████ met with ██████████ and ██████████ on 16 August who share our understanding.

It may be, however, that the 15 (plus the current trial group) comprises the majority of your remote gambling membership and a very high share of market GGY. Could you please confirm if this is the case. Also, can you please advise on the number of remote members who will not be onboarded in the forthcoming wave, why, and when they will be.

I asked you at the meeting why onboarding would take until the end of the year. I understand that it is a complex undertaking, but timelines have slipped. Can you please confirm that this wave will be fully onboarded by 31 December.

I am very keen to know when you will be in a position to present your “final” SCV product to the Commission and DCMS. We consider this to mean the fulfilment of your Sandbox plan which involves the development and implementation of two further use cases. We want to ensure a level playing field but will only be able to consult on mandating industry wide involvement in GamProtect once we are satisfied that your product has met our “Challenge.”

Phase 1 is a very positive start, and I don't underestimate the effort that has gone into getting us this far, but SCV was never intended to be just about closing accounts of those at self-declared crisis point. The Challenge objective was for industry to collaborate to make gambling safer by ensuring that when gamblers display evidence of harm or potential harm, they experience an informed, consistent interaction across their accounts that helps to reduce the impacts.

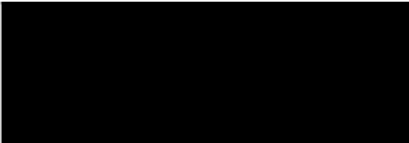


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Finally, please do let me know if you are experiencing any issues or pushback from elements of your membership. I would be more than happy to speak with them and remind them of the importance we and DCMS attach to this project.

Yours sincerely,



Marcus Boyle
Chair

GAMBLING COMMISSION

██████████
Chief Executive
Betting and Gaming Council (BGC)

By email only.

21 August 2023

Dear ██████████

BGC members offering gambling services without holding a required licence

At a previous meeting, I referred to the work we have been doing to tackle unlicensed illegal gambling, including our ongoing work to disrupt those offering such activities and increasing activity upstream to prevent such activity in the first place. That includes our ongoing international collaboration, with strong connections to our counterparts in Europe and beyond, and increasingly close ties with growing markets, particularly in the United States.

Illegal gambling is an issue the BGC has sought to give a very high profile to, including in the run up to the final publication of the white paper and your submission to the Select Committee, and later appearance. **I am sure you will have noted that illegal gambling is a feature of our [evidence gaps and priorities](#) work and it would be helpful if you would share any research you do conduct in this area.** For example, we have requested a copy of the research carried out on your behalf by Yield Sec but were advised at the time that you have not actually received the report, despite the research being referenced in BGC press releases. Obviously without sight of the research itself it is difficult for us to take account of figures that are solely referenced in a press release.

We have instigated a very deliberate programme of work to increase collaboration with other regulators around the world, which is proving very useful, especially in the area of illegal gambling. It is worth me making an important distinction here – I am not referring to so-called 'grey markets' where gambling is not prohibited but also not regulated or licensed within that jurisdiction. I recognise that several major operators now have a position of only operating in regulated markets, or remaining in markets which are becoming regulated, and it is generally a matter for governments in those jurisdictions to resolve in terms of what regulation they wish to put in place.

What is more concerning to me is that a number of regulators have now raised specific concerns that GB licensed operators appear to be operating in countries which are regulated markets and where there is a process in place to secure a licence, but where they have failed to do so. **In short, those operators are deemed to be offering unregulated, illegal gambling**, in the same way as an operator providing products and services into the GB market without having secured a GB licence. Among the operators of concern recently are several GB licensed operators, including members of the BGC. Let me remind you that if an operator licensed in Great Britain is offering illegal gambling in another jurisdiction, any such findings may give rise to concerns relating to their suitability to hold a GB licence.

We have also been looking into the risk of software provided by GB Licensed operators which appear to be advertised or offered by illegal entities/websites. So far it appears many of these brands are advertised but not available from Great Britain and as such the risk may be more of a perception one than real, but we need everyone to remain vigilant to support the licencing objectives to keep crime



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out of gambling. We have been proactive to reach out to media outlets to remove and be wary for paid content from illegal entities. I have met a few software providers already to raise this issue and I understand some operators are being proactive to limit the risk of their products being misused, cloned etc. I am grateful to those making efforts to prevent such activity and want to ensure there is consistent visibility and commitment to this cause. I expect that vigilance to be consistent across the sector so **I will be calling meetings with software providers to seek assurances on this matter and explore what more we can all do to avoid both the activity and perception of availability of such products on illegal sites.**

I would imagine you share my initial view that any connections between GB licensed operators and illegal activities, where it is concluded to be present, would undermine and rather pervert some of the arguments being made about the perception of potential risks of illegal gambling made to Government, Parliament and others.

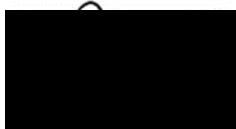
- **I would like you to clarify, especially given the profile the BGC has given to this issue, what is the BGC's position on operators, including any members, who may be operating in regulated markets without a licence?** It would be helpful to understand, in particular, on what basis you draw the distinction you appear, by definition, to have made between unlicensed operations in the GB market and unlicensed operations in other regulated markets.
- **Can you also clarify that the list of members on the BGC website comprise your full membership, if not, can you please provide us with a full list?**

The BGC's stated purpose is to champion industry standards and to be the 'standards body' for the industry which drives a focus on ethical standards and building public and institutional trust in the industry. Given the very clear and prominent statements the BGC has frequently made to that effect, I would hope you would agree that offering gambling in a regulated market without a licence is incompatible with membership of the BGC, and any members in such a position should either immediately withdraw from that market or immediately regularise the position .

A shared position on this matter would, I think, underline a mutual commitment to address the issue of illegal gambling and would be consistent with your stated aim to build public and institutional trust in the industry.

I am eager to retain a constructive, evidence-based dialogue on any risks of illegal gambling. Many licensed operators have been engaging openly, including to share specific examples where they can. I will also be continuing to engage with our international counterparts to ensure we are robust and consistent to stop illegal gambling activity from wherever it comes from. As discussed at the recent Chairs roundtable, **we will look to schedule this as an agenda item at the next CEO and Chairs roundtables.**

Yours sincerely,



Andrew Rhodes
Chief Executive

Mr Andrew Rhodes
CEO
Gambling Commission of Great Britain
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31 August 2023

Dear Andrew,

Following the publication of the Gambling Commission's (GC) first round of consultations stemming from the White Paper, we would like to raise particular concerns regarding the proposals within the "Remote Gambling: financial vulnerability and financial risk" consultation published on 26 July 2023.

We are supportive of the Government's proposals and stand ready to play an active role in helping to implement them. However, our concerns as set out below, are sufficiently serious that they must be brought to your attention now, even though we are only a few weeks into the consultation period. I would also like to formally request an urgent meeting with you to discuss and help find solutions to some of these issues.

Summary

- The GC's current proposal for the Financial Vulnerability Check does not meet the stated aim of the White Paper in that checks should be "frictionless".
- Operators cannot meaningfully respond to the proposed Financial Risk Assessment as it is significantly lacking in detail.
- The proposed requirement for operators to make decisions manually rather than through automated means is disproportionate, impractical, and unreasonable.
- The proposed definition of net loss is unnecessarily complex, and both technically and operationally very difficult to implement.
- We are greatly concerned by the fact that the GC has yet to fully consider a number of important legal and data protection considerations.

Financial Vulnerability Check

The GC's proposed version of the Financial Vulnerability Check (FVC) clearly goes against the stated aim of the White Paper, in that checks should be "frictionless". The Secretary of State for Culture, Media and Sport Lucy Frazer said when answering questions to Parliament: *"most people will not even know that the checks ... are happening. They will be frictionless and happen behind the scenes: 80% of people will have to do nothing at all and 20% will have a simple check on whether they have been made bankrupt or have a county court judgment against them. They will not know that that check is taking place"*.

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Under the GC's proposal there will be four required components of the FVC, namely, the credit reference agencies (CRAs) check against bankruptcies and county court judgements (CCJs), job title, employment status and postcode.

While the first component was expected, the remaining components were not. Operators will now be required to record customers' job title as part of the FVC. This introduces friction into the process as operators are not currently required to ask customers for this information. Customers' stated job titles are subjective and their corresponding income can be of great variance. For instance, a customer stating their occupation as a company director could be a sole trader, or the CEO of a FTSE100 company, earning well above the average income. This illustrates that the information is circumstantial at best. This is the same for employment status. If a customer state they are "retired", how will that give any information as to their monthly discretionary income? This will simply not work for those who have little or no credit history (credit invisibles), such as homemakers and women on maternity leave. Operators will have no choice but to ask for documentation to verify this information. The suggested change to the Licence Conditions and Codes of Practice (LCCP) states operators "must" combine this information with the CRA check.

Moreover, the White Paper clearly stated that self-certification "*is unlikely to be an adequate basis for a thorough and accurate risk assessment*". The GC's proposal to use job title and employment status, which relies on self-reporting by customers, will affect the accuracy of information and corresponding open source data. This is something that the GC themselves acknowledge within the consultation: "*some of the data (i.e. job title) may rely on self-reporting by a customer and this may affect the accuracy in some circumstances*". To date, GC assessment and enforcement have asked operators to verify information supplied by customers, often through open source. As a result, operators will be obliged to ask customers directly for documents, effectively amounting to additional Customer Due Diligence beyond Know Your Customer requirement, at an early stage of a customer journey.

There are a number of surveys conducted independent of the BGC that show customers do not like to hand over personal information to operators. For instance, a February 2023 [Racing TV survey](#) found that 50.7% of those asked to provide personal information refused to do so.

With regard to postcodes, the expectation that a customer's postcode will be used for either review against a deprivation index, average area salary, or "*open source data relating the average financial resources of those living in the postcode*" is disproportionate and potentially discriminatory. This information is, again, circumstantial at best. Operators could be subject to customer complaints and legal action, on the basis that they are being discriminated against based on their address. Postcode data can only provide population level insight and is inconducive to identifying vulnerability at an individual level.

The requirements to add employment status, job title and postcodes as verifiable information were not in the White Paper. They effectively create a demand to determine income before the Financial Risk Assessment (FRA). It was always intended that discretionary income consideration was to be done when hitting the FRA thresholds.

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The White Paper estimates 3% of customers will be subject to the enhanced spending check in the first year, of which only 10% will be subject to “disagreeable checks” (i.e. where frictionless checks cannot be delivered and presumably requiring documentation). Under the GC’s proposal, the reality is that 20% of customers will be subject to requests for personal information (i.e. job title, employment status, postcode) at the FVC level, of which operators are then required to determine “average salary”. This is the FRA at lower levels than required in the White Paper. Does the GC believe documentation is only required for the 0.3% of customers hitting the FRA who don’t have a credit profile, as mentioned in the White Paper Impact Assessment?

Financial Risk Assessment

Operators cannot meaningfully respond to this part of the consultation as the GC’s proposal is significantly lacking in detail. It is still unclear what data points CRAs are willing to share with operators on a data minimisation basis.

We are greatly concerned by the fact that CRA checks have yet to be scoped, tested or approved. Until the CRAs are able to share test data with operators, there is simply not enough detail for operators to ascertain the impact, accuracy or cost of the proposed changes at this stage. The BGC and its members are happy to work with the GC and CRAs in the development of this proposal, in order to define financial risk and the required data points, and then work with the Information Commissioner's Office (ICO) and UK Finance to ensure it is compliant with UK General Data Protection Regulation (UK GDPR).

Manual Decision/GDPR interpretation

Following FVC and FRA checks, the GC proposes that operators will be required to make decisions manually rather than through automated means. It is disproportionate that operators would need to review these cases on a manual basis, given the vast reliance on automation within all industries, including the financial sector. For example, the financial services sector uses automation to approve mortgages and credit card limits. CRAs use automated processes to generate credit checks. How then, can it be proportionate to ask operators to review all cases manually, following the identification of any level of risk flag?

For relatively straightforward cases, i.e. closing the account of a customer who is currently bankrupt, this can be dealt with by automation. For those at the other end of the scale, i.e. somebody who is potentially gambling at a level slightly above what has been determined to be reasonable for them, there are a range of measures that an operator can take, short of account closure. However, if they are waiting on a manual review, the potential exists that accounts could have been frozen or even closed, while operators work through the vast number of cases that they will be dealing with. A vast majority of customers won’t show a negative score from the FVC, yet they will be held up waiting for a manual decision by an operator. Imagine a horseracing punter at Cheltenham hitting the FVC check during the event, having to be told that they cannot make any further bets until a manual decision on the FVC has been taken.

As with most industries in the digital age, operators are increasingly reliant on automation as more sophisticated technical systems are developed. The GC should not stifle innovation and

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add more costs onto operators by forcing them to implement manual processes, into an area which can clearly be dealt with via automated means. The GC estimates around 6.1 million customer accounts to be captured under FVC and around 1 million customers to be captured under FRA. Large operators would need to manually review millions of checks and would need to recruit and train hundreds of people just to process the manual checks. The proposed requirement for operators to conduct these checks and manual reviews every 6 months is far from a risk-based approach. This is simply impractical and wholly disproportionate. We would welcome an opportunity to discuss an alternative approach with the GC.

Definition of net loss

The GC's proposed definition of net loss is needlessly complex, and technically and operationally very difficult to implement. Under the GC's proposal, stakes would only be counted towards net loss at the point of bet settlement, which could be many months after funds are deposited and a bet is placed. Implementation of this proposal would require a recalculation of a customer's position after settlement of every single bet or spin, over various backward-looking periods. This gives rise to the following issues:

- *Lower level of player protection:* a customer could place bets well in excess of the thresholds and would not be captured by either FVC or FRA checks, until such subsequent time as the bets are settled. Further deposits and bets could be made in the meantime. What would happen if, when a FVC or FRA check is subsequently conducted, it becomes apparent that the customer is unable to pass a check?
- *Significant cost and complexity:* operators would be in a position where they constantly have to establish a customer's net position following every settled bet, within a rolling 90-day period. This would be incredibly technically and operationally complex and require significant development and trialling by operators, as well as being confusing for customers.

Pending clarification of this key issue, it will be difficult for operators to accurately assess the likely costs of implementing the changes. We would welcome an opportunity to discuss an alternative approach with the GC.

Failure to consider key legal issues

As an overarching point, it is apparent that the GC has not given adequate consideration to the potential downsides associated with the FVC and FRA checks.

- (A) *Consumer freedoms and Equality:* Although the White Paper makes passing reference to consumer freedom, and the downside of "semi-agreeable" and "disagreeable" checks, the consultation gives very little consideration at all to the potential downsides for consumers of the FVC and FRA checks.

The consultation suggests that there will be a separate exercise to seek the views of consumers. However, these key issues should have been properly addressed in the

consultation itself, rather than as a side issue, having regard to the established public law principles governing public consultations.

These issues are fundamental. The GC must ensure that any regulation is legitimate and proportionate as regards consumers, given the need to comply with the Data Protection Act 2018 / UK GDPR, the Equality Act 2010 (EqA10), and Article 8 and Article 1 of Protocol 1 of the European Convention on Human Rights.

The failure to properly consider the downsides for consumers is also evident in relation to the EqA10. The consultation refers briefly to the possibility that its proposals may constitute direct discrimination against younger adults on the basis of age. However, the GC has not also considered the fact that there are a range of individuals, often referred to as “credit invisibles”, who are unlikely to be able to pass credit checks due to their lack of credit history or employment record.

Credit invisibles may, for example, be home makers or retirees. These groups may well have protected characteristics for the purposes of the EqA10 (e.g. gender, age, race), and to the extent that such groups are likely to be disadvantaged by the proposed system of FVC and FRA checks (because they will find it harder to pass such checks), then that raises the question of whether the proposals give rise to indirect discrimination against such groups. However, the GC fails to refer to this issue at all.

This is surprising, given that very similar issues were brought to the attention of the GC in response to the GC's *Customer Interaction - Guidance for remote operators* consultation (November 2022). It also raises the possibility that the GC's consultation fails to comply with the established public law principles governing consultations. The 2018 Consultation Principles state that “*Consultations should be informative - Give enough information to ensure that those consulted understand the issues and can give informed responses*”. However, the consultation contains little considered reference to these issues, or explanation of how the Commission intends to ensure compliance with them.

(B) *Business Impacts*: The Regulators' Code states that regulators should consider “*how they can best: understand and minimise negative economic impacts of their regulatory activities; minimising the costs of compliance for those they regulate*”.

The consultation refers to the impact assessment set out in Annex A of the White Paper. Annex A provides only an estimate of the reduction in GGY which would result from the proposed introduction of the FVC and FRA checks (of between £380m - £710m, based on a number of assumptions, such as it being possible for frictionless FVCs to be delivered for 100% of customers, and 80% of customers being able to pass a FRA check frictionlessly). Annex A does not make any reference to the costs of implementation for operators. The consultation itself does not include any new information in relation to the likely impact of the changes, and makes no attempt to analyse the costs to business of implementing the proposed FVC and FRA checks.

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The GC should note that the EANDCB of the FVC and FRA checks will exceed £5m. These changes will therefore constitute a qualifying regulatory provision (QRP), and the GC will be required by s.24A of the Small Business, Enterprise and Employment Act 2015 to produce a detailed impact assessment in respect of these proposed changes. The Government's *Business Impact Target Statutory Guidance* (January 2019) states:

“In the interests of good policy-making, the Government strongly recommends that for QRPs Regulators undertake the evidence-gathering process during the proposal development stages, and that a BIT Score is calculated and verification sought from the RPC prior to a final decision on implementation being taken. However, the Government accepts that Regulators may, for a variety of reasons, want to take a different approach.”

It is therefore concerning that the proposals set out in the consultation are vague in a number of key respects (for example, in relation to the types of information which operators will be required to obtain and review in connection with the FVC and FRA checks). This makes it difficult for operators to assess and comment on the likely costs of the proposals. In turn, this may prevent the GC from fulfilling its obligations in respect of producing an Impact Assessment.

The GC is required to consult HMRC in respect of the proposed changes to the LCCP (s. 24(10) GA05). Again, given the current lack of detail regarding the scope and financial implications of the proposed changes, it is difficult to see how HMRC will be able to effectively respond at this stage.

Data Protection Considerations

On 13 July 2023, the ICO published a letter sent to UK Finance regarding the *Sharing of personal data to facilitate "financial risk checks" by online gambling operators*. This letter indicates that UK Finance had asked (seven months previously) for a steer in respect of two narrow issues relating to the re-purposing of data. The ICO indicates that, in relation to those two specific issues, the ICO is of the view that it is *in principle possible* to design the risk checks in a compliant manner, subject to appropriate DPIAs being conducted and the relevant data sharing agreements being suitably adjusted. More generally, the ICO indicates that the financial risk checks and the sharing of data must be done transparently and proportionately.

The ICO notes in passing the sensitivity of the personal data which would be processed, and the potential impact on individuals in terms of denial of service by online gambling operators. The ICO states that the CRAs should share only the minimum amount of personal data needed to fulfil the new purpose (as required by UK GDPR). The ICO does not provide any specifics regarding the extent of the data which would be shared, but refers to the possibility of sharing zero-knowledge proofs (which confirm that someone is not at financial risk without revealing any further information regarding their financial status).

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Similarly, the White Paper states: *We would expect the credit reference agency would be able to provide an overview of pertinent information for the individual customer, for instance an estimate of overall disposable income, rather than providing all the raw data to gambling firms.*

The GC's proposal is inconsistent with the ICO and the White Paper's regard for data minimisation. The GC suggests that where a FRA check is triggered, that an operator must obtain data from a provider, or obtain a risk assessment from a provider, which includes *both (a) credit performance data and (b) income and expenditure data, including current account turnover data*. The GC does not explain why this information is pertinent (as opposed to the *estimate of overall disposable income* suggested by the White Paper), or why processing such data is compatible with the key data protection principles of purpose limitation and data minimisation (i.e. that data should only be processed for a specific purpose, and that only the data which is strictly required for that purpose should be processed). The GC does not explain what period must be covered by its proposed checks, or what relevance e.g. historic credit performance data may have.

Next Steps

I hope that these initial comments have been of assistance to you in understanding why these proposed changes in relation to FVC and FRA checks present significant challenges, and why we have felt the need to bring this matter to your immediate attention. The GC's consultation deviates from the proposals set out in the White Paper in a number of regards. It is imperative that we discuss these issues before the end of the consultation period and identify solutions.

Although you can see that we have a number of important and serious concerns about the consultation, my hope is that this will be a real and meaningful consultation, in that the GC will want to listen and respond to reasonable concerns. To repeat: the BGC and our members are determined to work with the GC to make this part of the Government's White Paper a success. But for any changes to be a success, they must be workable and consistent with the intention of the White Paper. I am very grateful for your continued engagement, and I look forward to meeting you soon. Given the obvious interest here, I am also copying this letter to [REDACTED]

Yours sincerely,

[REDACTED]

CEO, Betting and Gaming Council

cc. [REDACTED] MP, DCMS

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From: [REDACTED]
To: [Andrew Rhodes](#)
Cc: [Marcus Boyle](#); [REDACTED]
Subject: Pathway for bereaved families to disclose information to the GC
Date: 11 September 2023 16:58:08
Attachments: [image378129.png](#)

CAUTION: This email is from an external source - be careful of attachments and links

Dear Andrew,

We were last in touch almost a year ago when GwL was just at the start of working with [REDACTED] on a pathway for bereaved families to disclose information to the Gambling Commission. It felt at that point, despite some bumps along the way, that bereaved families would have a route to working with the Gambling Commission that would be safe and respectful of them, and that would help the Gambling Commission receive information it needs to perform its regulatory function.

For a number of reasons that's now in question.

- The first family who disclosed information to the GC under the new pathway were given the impression that they would be able to receive the gambling history of their deceased loved one, only to then be told they couldn't have it, with some hard to accept reasoning. This was and continues to be very upsetting for them, and does not align with the levels of transparency that were intended when we embarked on this work with your team. I'm convinced that there must be a way to share information with families in a way that doesn't create any risk for the GC.
- We understood that since last year the GC was working on the development of a framework or MOU with the Chief Coroner, but we haven't heard anything substantive to come from that work. I followed up in January with [REDACTED], copying you in, pressing the importance of this work in allowing families to disclose information to the GC in a way that meets the GC's requirements on the timely sharing of information. One family we are supporting have been keen for a year to share information with you about the death of their loved one and the activities of BET 365 but are having to consider very carefully with their lawyers what the impact might be on their son's inquest. Leaving them and others in this position is unfair and unproductive.
- Further issues have emerged publicly over how the GC engaged or failed to engage with the coroner in the [REDACTED] case, which I won't go into as I know that you're in correspondence with [REDACTED] and her representatives on the matter. What I will say is that the situation is concerning from the perspective of any bereaved family considering working with the GC.

We understood very clearly from [REDACTED] when she was in post that the GC wants the information that families hold on your licensees' activities as quickly as possible, and that the GC intends to be compassionate and transparent with them.

As a matter of urgency are you available to meet with us to discuss the issues raised in this email?

Best wishes

[REDACTED]

[REDACTED]

[REDACTED]

Mobile: [REDACTED]

Web: www.gamblingwithlives.org

Andrew Rhodes
Chief Executive
Gambling Commission
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12th September 2023

Dear Andrew,

Re: Gambling Prevalence Survey for Great Britain

I am writing to you to express the concern of the BGC and its members in relation to the planned publication of a new Gambling Survey for Great Britain next year and particularly your plan to replace the 'Gold Standard' NHS Health Surveys with an experimental new Gambling Survey for Great Britain.

We want to be clear that we share your interest in the collection of robust data in order to inform policy, as well as your concerns about the misrepresentation of statistics and your desire for a greater degree of care in this area. However, we are concerned that the approach is potentially inconsistent with the Code of Practice for Statistics¹, and therefore subject to a potential compliance review by the Office for Statistics Regulation (OSR) by virtue of the Statistics and Registration Service Act 2007.

There is a clear risk that the change in survey methodology will have a serious impact on the Government's Gambling Act Review given the implications for Financial Risk Assessment thresholds; and the establishment, and rate, of a statutory levy to fund gambling harm prevention (as well as the forthcoming introduction of quotas for remote customer interactions).

At the outset of the Gambling Survey for Great Britain project, the Gambling Commission admitted that the switch from face-to-face interviewing to an online survey was likely to result in over-reporting of gambling participation and the population prevalence of 'problem gambling'; and acknowledged that the framing effects of a gambling survey (as distinct from a health survey) also raised the risk of sample bias. Both of these concerns – which we share – are underpinned by an extensive research literature².

The results released to date (the Pilot Survey and the Experimental Stage results) vindicate these concerns, with strong evidence of selection bias in both survey samples. We have seen no evidence that the project team has been successful in eliminating skew and we have been told that the 'problem gambling' rate in the final survey *will* be higher than in the NHS Health Surveys because of changes to survey methodology. This suggests a degree of pre-determination which is both unscientific and potentially inconsistent with aspects of The Code of Practice for Statistics.

¹ <https://code.statisticsauthority.gov.uk/the-code/>

² See for example, Sturgis & Kuha (2022), p.63: *"Our findings show that surveys conducted online produce substantially higher estimates of problem gambling compared with in-person interview surveys. This is because online surveys, whether using probability or non-probability sampling, overrepresent people who are more likely to gamble online and to gamble frequently, relative to the proportions of these groups in the general population."*

We have set out our concerns in greater detail in the attachment to this letter. We acknowledge that there may be benefits from creating a new prevalence survey (including timeliness and coverage) but do not consider that any of these should be traded off against survey reliability. In order to build confidence in the statistics, we would appreciate answers to the following questions:

1. Will the survey, methodology, and results be submitted for review to the Office for Statistics Regulation to ensure that the process of replacing the 'Gold Standard' NHS Health Survey with an experimental online survey is consistent with OSR guidelines and consistent with the Commission's stated ambition to "*build confidence in the statistics through transparency and access to data for all*"?
2. Will you grant reasonable requests for additional data accessibility, so that we and others can assess the context for the results published to date and their likely reliability?
3. Will you consider wider evidence with regard to survey reliability – including comparisons with independently audited and assessed industry data?
4. Will you commit to a genuinely independent assessment of survey reliability, such as that carried out by Professors Patrick Sturgis and Jouni Kuha in their 2022 research paper on comparisons between online and face-to-face surveys?³
5. Will the NHS Health Surveys remain the source of Official Statistics on gambling participation and the prevalence of 'problem gambling' until far more robust and transparent checks have been completed on the reliability of the new Gambling Prevalence Survey for Great Britain?⁴

We hope that you agree that these questions are reasonable and that such steps are worth taking in order to ensure that Official Statistics remain trusted and reliable. We look forward to hearing from you in regard to this matter.

Yours sincerely

[Redacted signature block]

³ Sturgis, P. & Kuha, J. (2022) How survey mode affects estimates of the prevalence of gambling harm: a multisurvey study. *Public Health*

⁴ It is our understanding that the NHS Health Survey for England will contain questions on gambling in both its 2023 and 2025 editions

The Gambling Prevalence Survey for Great Britain

Our concerns relate to the reliability of the survey results and the extent to which the project may be inconsistent with the Code of Practice for Statistics; and the implications for effective market regulation arising from the use of unreliable statistics. The Gambling Commission has acknowledged from the outset that the use of an online survey and framing effects arising from the designation of a gambling survey (as distinct from a health survey) creates risk of over-reporting both gambling participation and the prevalence of problem gambling. We agree and – based on the results published to date by the Commission – have little confidence that these sources of bias have been mitigated.

The Code of Practice for Statistics

In its December 2020 consultation on gambling participation and problem gambling prevalence research, the Gambling Commission stated:

As part of our duty under the [Gambling Act 2005](#) to advise the government on gambling in Great Britain and provide an effective regulatory function, we collect gambling participation and problem gambling prevalence data via surveys of adults in Great Britain. The data are published as official statistics – meaning they are produced in accordance with the standards set out by the Government Statistical Service in the Code of Practice for Statistics.

The statistics published by the Gambling Commission have the status of 'official statistics', and the Gambling Commission is required to comply with the Code of Practice for Statistics (the "**Code**") published by the UK Statistics Authority ("**UKSA**").

The UKSA is required to promote and safeguard: (a) the quality of official statistics (including their impartiality, accuracy and relevance, and their coherence with other official statistics); (b) good practice in relation to official statistics; and (c) the comprehensiveness of official statistics.

The Code is intended to ensure that official statistics are trustworthy, good quality and are valuable. The key principles underpinning the Code include that:

- those producing statistics must demonstrate their integrity and professionalism. Their behaviours and actions should reflect the public interest as shown in their public commitments, attitudes and processes;
- statistics have to be based on the right data sources, with transparent judgements about definitions and methods, and judgements about the strengths and limitations of the statistics. Producers should demonstrate how they assure themselves that their statistics are robust and reliable; and
- statistics must be equally available to all, and not be released partially or to selected audiences.

Amongst other things, the Code specifically states that:

- The collection, access, use and sharing of statistics and data should be ethical and for the public good. Those producing and releasing statistics should be free from conflicts of interest, including political and commercial pressures, that may influence the production, release and sharing of the statistics and data. [Para. T1.2 of the Code]
- Statistics, data and explanatory material should be presented impartially and objectively. Independent measures, such as internal and external audit, peer review and National Statistics Quality Reviews, should be used to evaluate the effectiveness of statistical processes. Statistics producers should be open about identified areas for improvement. [T4.6]

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- The nature of data sources, and how and why they were selected, should be explained. Potential bias, uncertainty and possible distortive effects in the source data should be identified and the extent of any impact on the statistics should be clearly reported. [Q1.5]
- The causes of limitations in data sources should be identified and addressed where possible. Statistics producers should be open about the extent to which limitations can be overcome and the impact on the statistics. [Q1.6]
- The quality of the statistics and data, including their accuracy and reliability, coherence and comparability, and timeliness and punctuality, should be monitored and reported regularly. Statistics should be validated through comparison with other relevant statistics and data sources. The extent and nature of any uncertainty in the estimates should be clearly explained. [Q3.3]

Inconsistency between the Health Surveys for England and the Pilot Study

While the statistics published by the Gambling Commission are required to carry the designation of 'official statistics', the statistics within the Health Survey for England carry the higher designation of 'National Statistics', on the basis that these statistics have been assessed as meeting the highest standards of Code compliance, including the value they add to public decisions and debate.

It is therefore concerning that the Pilot Survey (and, by inference from Gambling Commission statements, the experimental stage) reported a markedly higher overall level of gambling participation in the population than HSE in 2018 and HSE 2021. Based on our own analysis, we do not consider these results to be plausible. If the Commission's new survey is skewed towards people with higher than average engagement in gambling, it seems obvious that it will also over-report rates of 'problem gambling' in the population⁵. The NatCen/University of Glasgow report on the Pilot Survey attempted to adjust comparisons between the Pilot Survey and the HSE 2018 by comparing 'problem gambling' rates among people with similar breadth and frequency of participation in gambling – but failed to recognise the distortive effects that lockdown measures will have had on both metrics. Taken together with the Commission's insistence (unsupported by evidence) that Health Surveys have under-reported the population prevalence of 'problem gambling' we are concerned that this project may not have been approached with sufficient rigour.

It is also concerning when Commission officials have made statements at odds with the spirit of the Code, such as:⁶

The pilot of course presented figures regarding levels of gambling related harms different to our current methodology. Whilst our current figures show the overall problem gambling rate is statistically stable at 0.2%, the pilot data suggested that rate for participants was 1.3%. The figures are different. We make no apology for that.

Following its last compliance check, the Office for Statistics Regulation ("**OSR**") wrote to the Gambling Commission on 21 June 2019.⁷ The OSR stated:

we encourage you to engage more widely. Being able to incorporate the views of a wide range of bodies, including interested lobby and industry groups and academics, could help you to make further improvements that would deliver more insight from these important data sources.

⁵ Findings from the experimental stage that the sample over-reported rates of suicide attempt also indicate sample skew.

⁶ <https://www.gamblingcommission.gov.uk/news/article/westminster-media-forum-ian-angus-keynote>

⁷ <https://osr.statisticsauthority.gov.uk/correspondence/compliance-check-of-gambling-commission-industry-statistics/>

You may be able to reinforce the quality and trustworthiness of the statistics by including more detailed documentation of your arrangements for assuring the quality of data. When users can read clearly about how the data are quality assured, they are able to better interpret the strengths and limitations of the statistics.

We have made several requests for data that would help to test the reliability of the Pilot Survey (as well as the 'experimental stage' results); but these have been rejected. It should be expected that outside parties will wish to critique the findings and data. This is part of a dynamic and open process to assure data quality and analysis.

Pursuant to para. Q3.3 of the Code, we would expect the Pilot Study to be validated against the HSE surveys⁸, particularly as these carry the higher designation of 'National Statistics'. We believe that further work should be done to assess the reliability of the Pilot Study and the experimental stage results; and that the Gambling Commission should engage with stakeholders in a far more transparent and open way in order to achieve this.

Practical consequences

The Commission's plan to report a higher rate of population prevalence of 'problem gambling' threatens to have a distortive effect on market regulation:

Post-hoc impact on LCCP changes. By changing the reported rate of 'problem gambling' by use of methodological revision, the Gambling Commission threatens to subvert three consultations on market regulation by introducing (potentially unreliable) post-hoc revisions to key evidence.

- **Interaction Quotas** – in January 2023, the Commission closed a consultation on remote customer interactions. This included the introduction of quotas for interaction, based on the reported 'problem gambling' prevalence rate among participants in each type of activity. These quotas have been proposed using 'problem gambling' rates from the HSE 2018. Should these rates subsequently increase (as appears to be the Commission's intention) we should therefore expect the quotas to rise. The Commission has therefore proposed a formula to calculate interaction quotas in the full knowledge that a key variable will be subject to arbitrary increase in the near future; and that the quotas may be expected therefore to rise shortly after their introduction.
- **Financial Risk Assessments** – in July 2023, the Gambling Commission opened a consultation on the introduction of standardised thresholds for financial risk assessments for consumers gambling online. The consultation document states that "problem gambling rates and other information about harms" was one of "three key information points" used to establish the thresholds. It seems likely therefore that the planned increase in the reported rate of 'problem gambling' will lead to a future downwards recalibration of these thresholds.
- **Statutory Levy** – although the DCMS has yet to open its consultation on the establishment of a statutory levy to fund gambling harm prevention, it is likely that its assessment of required resources will be influenced by the official reported rate of 'problem gambling' in Great Britain (for example by considering cost per 'problem gambler'). The planned introduction of a higher reported rate of problem gambling prevalence clearly has the potential to influence the outcome of this consultation – or future consultations to recalibrate funding levels.

⁸ This should include the HSE 2021, but it is our understanding that the project team has made no attempt to do so and has not even requested the full gambling dataset from the NHS.

The impact that the change in the reported rate of problem gambling will have has not been mentioned in either of the consultation documents published to date; and this raises an issue of transparency. It also means that any impact assessment conducted by the Commission in relation to the planned changes to the LCCP will prove to be wrong; and it threatens to undermine the policy intent of the Government's Gambling Act Review.

Beyond these near-term practical consequences, we also note that the official statistic on the population prevalence of 'problem gambling' is a key variable in a wide range of other studies and – as the Commission has itself acknowledged – it is commonly used for political purposes. We highlight the following examples:

- It directly affects the Office for Health Improvement and Disparities ('OHID') estimate of *'deaths by suicide associated with problem gambling'*. The Commission's planned increase may result in the OHID's estimate of such deaths rising from 496 to 2,000 (or one-third of all such deaths in England). The Gambling Commission is well aware of the problems with the OHID estimates, describing them last year in an internal report released under the Freedom of Information Act as being *'not based on reliable data'* – but has refused to disclose this opinion publicly. The Commission is also well aware of the effect that its new prevalence survey will have on such estimates, having speculated (immediately prior to the publication of last year's Pilot Survey) that, *"if investigated in future, the multiplier may be lower but the PG rate may be higher than 0.4% to produce a broadly similar number"*. It is difficult to see how the Commission can claim to be acting in good faith if: i) it continues to suppress its view that the OHID estimates are *'unreliable'*; and ii) it contributes to a substantially increased, arbitrary and – to use the Commission's own words – *'unreliable'* estimate.
- It will directly affect wider claims (also unreliable) about economic costs associated with gambling. These include the OHID report but also the recent report from the National Institute of Economic and Social Research ('NIESR'). This report is highly speculative (for example, 60% of its cost estimate is based on the spurious contention that winning £500 over a two-year period and being economically inactive due to ill health is a suitable proxy for DSM-IV 'at risk gambling') and contains numerous mathematical and factual errors. The Gambling Commission approved funding for this report and – according to NIESR – fed back on its production; but has indicated that it has no interest in whether or not it is likely to be accurate. We note too that a key adviser to the Gambling Prevalence Survey for Great Britain project served on NIESR's expert advisory board for the project.
- It will distort attempts to evaluate the effect of recent and planned changes to market regulation by altering official statistics (and may indeed be used to show that reforms are associated with increases in the rate of 'problem gambling'; or that 'problem gambling' has increased in spite of reforms).

Having repeatedly advised licensees in recent years that the population prevalence of 'problem gambling' was *'too high'*, we are concerned that the Commission now appears intent on inflating the rate by moving away from a highly reputable ('gold standard') survey to a highly experimental one. The justifications provided for this by the Commission are weak – our analysis attached to this letter suggests that the targeted benefits may be rather marginal and that they represent a poor trade-off compared with survey reliability. We understand that the Department for Health and Social Care has committed to fund gambling questions within the Health Survey for England 2023, 2025 and (possibly) 2027. It is unclear why the Commission did not itself disclose this. The new survey may therefore increase costs and diminish clarity.

We support the Commission in collecting high quality data which may be used to inform regulatory policy and which can help operators to enhance their own insights and improve their own procedures. The work published by the Commission to date however, gives us little confidence that the new survey will be as reliable as the NHS Health Surveys.

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Analysis of Gambling Commission's rationale for replacing the NHS Health Surveys	
Rationale	Analysis
<p>1. <i>Lack of control over our access to Health Surveys limits our ability to report representative data for the whole of Great Britain</i></p>	<ul style="list-style-type: none"> - Gambling questions were included in the Health Survey for England in 2012, 2015, 2016, 2018 and 2021 – and would have been included in the 2020 survey had it gone ahead. - Questions have also been included in the Scottish Health Survey in 2012, 2015 and 2016. - England represents around 86% of the population of Great Britain. Differences in reporting in Scotland and Wales are unlikely to affect overall results for Great Britain in any meaningful way. - Results from the Scottish Health Survey and the Wales Omnibus have failed to indicate any material differences in gambling behaviours or harms. - The Quarterly Telephone Survey provides a mechanism for testing whether important differences exist between England, Scotland and Wales.
<p>2. <i>Different participation and prevalence questions on different surveys generate multiple figures</i></p>	<ul style="list-style-type: none"> - This is correct – but a new prevalence survey will not help this; in fact it will make matters worse. - FOIA disclosures reveal that the DHSC has paid for the inclusion of gambling questions in the Health Survey for England 2023, 2025 and (probably 2027). - In addition, rates of gambling participation and 'problem gambling' will also be reported in the Adult Psychiatric Morbidity Survey 2022 and the GambleAware Annual Treatment Survey. - It may also be the case that the Commission continues with its Quarterly Telephone Survey.
<p>3. <i>Data from the different surveys is not directly comparable due to different methodologies being used</i></p>	<ul style="list-style-type: none"> - This is correct – but the new prevalence survey will exacerbate this (as described above).
<p>4. <i>The infrequency and long turnaround time of the Health Surveys from inception to reporting</i></p>	<ul style="list-style-type: none"> - Health Surveys took place in five years out of ten between 2018 and 2021. This would have been six years out of ten had the 2020 survey not been cancelled. - There is no suggestion that different actions might have been taken had the surveys been carried out more frequently. - It took nine months between the end of fieldwork for the 2018 Health Survey for England and publication; it took 11 months for the 2021 survey. These do not appear to be very long turn-around times. While expediting results is possible (e.g. results for alcohol consumption were released four months after fieldwork ended), speed is not worth the sacrifice of quality. - The Quarterly Telephone Survey has provided the ability to test for changes between household prevalence surveys.
<p>5. <i>Traditional research methods (on which we rely) are in decline and under greater threat due to Covid-19 impacts</i></p>	<ul style="list-style-type: none"> - This may or may not be true. It is too soon to say whether Covid has permanently affected data collection. In the meantime, we observe that the (Covid-affected) Health Survey for England 2021 had a response rate c50% higher than the Pilot Prevalence Survey.

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Mr Marucs Boyle
Chair
Gambling Commission of Great Britain
Fourth Floor
Victoria Square House
Victoria Square
Birmingham
B2 4BP

13 September 2023

Dear Marcus,

Re: Clarification regarding GamProtect

Thank you for your letter dated 1st September, regarding the industry led multi operator risk sharing solution, GamProtect. We are very pleased with the progress we have made and are committed to working with our members to deliver GamProtect.

We agree that the Commission have never stipulated that BGC onboard a further category of 15 members only. Our ambition has always been to onboard as many operators as possible, regardless of their BGC membership status. I must stress however, that GamProtect is a voluntary initiative led by the BGC, and we have no authority to mandate operators to participate in this project, while at the same time we are being proactive in ensuring anyone who wishes to onboard will be able to do so. We have had several meetings with our eligible members and they have expressed a willingness to join.

While operators are supportive of the progress we have made in the current trial, only the trial participating operators have been fully involved in the development process. We are working closely with our biggest operators, who cover approximately 95% market share, to explain the work that we have done, including the Commission's work and our own work with the Information Commissioner's Office. This is why our current focus is to onboard this cohort of operators as soon as possible. We will begin the onboarding process in Q4 this year and expect to have the majority of this cohort onboarded in Q1 2024.

As I have explained to you in our previous meetings, it takes an incredible amount of work to onboard operators. I outline some of the workstreams below:

Governance Structure

The trial is currently governed by a steering committee comprising of the trial participating operators. While this has been working well with a small group of operators, it is unsustainable for a wider group beyond the trial. We are currently in the process of developing a governance framework. This includes an agreed and approved governance board and the scope with the appropriate level of support to manage the GamProtect scheme.

Onboarding Process

The new operators who are 'onboarding' have not been involved in the initial development and trial phase of the project. It has been an iterative process to get operators fully across the various workstreams, including compliance, data protection, commercial, technical, information security and legal.

Operators then need to obtain the necessary sign offs internally before they are able to commit formally to onboarding. We have been working closely with operators over the past few months

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to address their concerns, understand their unique challenges and establish a roadmap. This is also against their own internal resourcing priorities and their existing dependencies already in flight with some having considerable lead times in their programmes.

For context, operators must review and sign off the below list of documents:

1. Data Sharing and Services Agreement – 110 pages
2. Data Protection Impact Assessment – 48 pages
3. Legitimate Interest Assessment – 16 pages
4. Privacy Notice – 15 pages
5. Appropriate Policy Document – 6 pages
6. Personal Data Retention Policy – 7 pages
7. Personal Data Breach Process – 7 pages
8. Rights and Redress Process – 12 pages
9. GamProtect Security Controls – 4 pages
10. GamProtect Technical Specification

Evaluation and reflection

Furthermore, onboarding is dependent on the results of the trial evaluation. Trial participating operators and onboarding operators will review the full evaluation report before making a formal decision on onboarding. We are working with KPMG to deliver the evaluation report and expect the report to be ready in October. Depending on the findings of the report, we will look to implement any recommended improvements/changes onto the current system before we go into the full scheme and onboard a further cohort of operators.

We believe it is vital that the trial is a successful one that leads to a roll-out that industry and the Commission are satisfied with, and that ultimately protects players. There is no final product – the product is the scheme itself and we look to layer on more trials based on different elements. It is an ongoing process. We have indicated that we are happy to begin scoping the self-exclusion trial.

We have provided regular updates to and are in regular contact with your colleagues [REDACTED] and [REDACTED]. We appreciate the Commission's ongoing support and look forward to continuing working closely with your colleagues on this project.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Roundtables
Date: 14 September 2023 11:17:00
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)

Hi [REDACTED]

Hope all is well. Sounds like it was a productive meeting on Tuesday so thanks for your help in organising it.

For the casinos roundtable coming up on 25 September, regarding agenda – our senior manager leading on GAR land-based proposals is happy to attend and talk through some of the next steps on those (building on some 1:1s he’s already been having). I understand from an operator they can also give an update on the ‘industry standard’ exercise they were looking at. So thoughts on agenda are:

1. Compliance conversation – update on industry standard activity
2. GAR:
 - a. Update on progress
 - b. Looking ahead to land-based proposals
3. AOB

Anything else to add from your side?

[REDACTED]

From: [REDACTED]<[REDACTED]@BettingandGamingCouncil.com>
Sent: Monday, August 7, 2023 2:17 PM
To: [REDACTED]<[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]<[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]<[REDACTED]@BettingandGamingCouncil.com>
Subject: RE: Roundtables

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

I hope you are well. Just following up on the below – please can you send out the meeting invites to the attendees?

[REDACTED] has now left the BGC, so grateful if you could come to my colleague [REDACTED] or myself on this going forward.

Best,
[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Follow up
Date: 15 September 2023 09:05:00
Attachments: [image001.png](#)

Hi [REDACTED] – I'm copying [REDACTED] in as I think they saw a constructive option to discuss this with you at a forthcoming meeting, the pace and focus of the group will be vitally important.

The working group is entirely separate from the industry forum.

Let me follow up the secondment point internally and get back to you.

Regards,

[REDACTED]

From: [REDACTED]@BettingandGamingCouncil.com>
Sent: Thursday, September 14, 2023 10:28 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@BettingandGamingCouncil.com>; [REDACTED]
[REDACTED]@BettingandGamingCouncil.com>
Subject: Follow up

CAUTION: This email is from an external source - be careful of attachments and links

Dear [REDACTED]

Hope you are well. I've got some CEOs wanting a little clarity around the Working Group on Financial Risk Checks we discussed on Tuesday in the roundtable. I don't believe the launch of the Industry Forum today was related to that WG idea. Can you confirm? I'd also like to start getting some flesh on the bones on the WG – Andrew said he would Chair it and I know we wanted to start it soon (this month) in light of the consultation. I guess I can work with [REDACTED] or [REDACTED] on the ToR?

Also – do you have a spec on what type of people the GC wants to second from industry to assist on Black Market?

Cheers,

[REDACTED]

[REDACTED]

M: [REDACTED]
E: [REDACTED]@bettingandgamingcouncil.com

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