

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Data Session Follow-up and Policy Liaison  
**Date:** 12 January 2023 09:30:00

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Morning [REDACTED],

Apologies for the earlier cryptic reference to [REDACTED] correspondence, it's helpful to know you are looped into that. I know [REDACTED] office are exploring opportunities for him to follow up on some of the points made.

For a meeting on the White Paper, it looks like the most relevant colleagues out our end have availability on the 24<sup>th</sup> Feb between 13.00 – 14.30, or any time after 14.30 on the 27<sup>th</sup> Feb. Let me know if either of those would work for you and I will hold time in diaries here. Subject to the timing of publication we can confirm particular areas of interest and attendees closer to the meeting or indeed rearrange it if there are further delays.

Regards

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**From:** [REDACTED]  
**Sent:** 10 January 2023 17:36  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Data Session Follow-up and Policy Liaison

Afternoon [REDACTED],

Thank you for the note and Happy New Year to you and the team.

I am aware that one of your media rights holders followed up on our collective engagement with a letter to [REDACTED], reiterating the points made when we met.

It was suggested during our meeting that the individual groups would follow up the discussion with some more granular commercial data showing the reduction in turnover, but as yet we have not received anything. If your colleagues still think that is of value we are happy to receive material. I did follow up an enquiry from one attendee following the meeting on the treatment of such data. I reiterated that we would treat the information as commercially sensitive and use it only to inform internal considerations, but as you will appreciate as a public body my FOI team did advise me to flag the following to inform any decision to share data:

*As a public authority all recorded information, we hold is subject to potential disclosure under the FOIA. Each request for information needs to be considered on a case by case basis. However, we are aware of the sensitive nature of data we hold and would not be in a position to release information which is of detriment to us or the provider of the information. Section 43 (the exemption for commercial interests) provides a way to block disclosure of information that will harm the commercial interests of both public bodies and other organisations that they do business with. But it is a qualified exemption – subject to a public interest test – so, while this is potentially an appropriate exemption, there are no absolute guarantees.*

On the White Paper, I'll resist any temptation to predict publication dates. Happy to look to hold a slot in Feb with a view to rearranging if the White Paper has not appeared or if further time is required to digest it. The cast list at this end may be a little different as it is likely some of my policy colleagues can helpfully be involved. Let me check the availability at this end and I will share some possible slots later this week.

Regards

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**From:** [REDACTED]

**Sent:** 02 December 2022 16:43

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Data Session Follow-up and Policy Liaison

Afternoon [REDACTED]

Thank you for your help arranging today's meeting and please reiterate our thanks to the various attendees. Given the complexity and contentiousness of the issues discussed I agree it is important to have constructive engagement to help us understand our respective positions even if we do not always agree on every issue.



On the issue of sharing commercially sensitive data we are happy to engage with individual stakeholders where they have data that they believe can help our understanding and insight into their businesses. Given the anticipation that a White Paper is due shortly, perhaps it would be sensible to use that as the point at which further engagement collectively and individually (where necessary) would be most constructive. If there is any data that attendees wish to share in advance of the White Paper publication to substantiate the headline points made today, [REDACTED] and I are happy to discuss any related handling points. Equally we are happy to engage with you and [REDACTED] on other aspects of the White Paper once published, to discuss any elements that the Commission will be responsible for delivering.

One recurring theme from today's discussion was the concern of displacement to unlicensed operators (domestic or overseas). Whilst we can pick up on the specifics when we speak next, it would be helpful for colleagues here to understand what sort of evidence or proxies are being relied upon for that aside from anecdotal accounts. I think it was [REDACTED] who mentioned he has access to some interesting data in that space and we would be interested in understanding what type of data he was referring to.

Feel free to continue to use [REDACTED] or me as a point of contact and we can ensure relevant policy colleagues here are engaged as required.

Regards

[REDACTED]

[REDACTED]

GAMBLING COMMISSION

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