

Sent date	Subject line	In scope content
01/06/2022	Official Sensitive: Commissioner Update - 16 May - 1 June	██████████ delivered training to compliance and enforcement colleagues on the new customer interaction requirements, which will come into effect on 12 September. The discussions at these sessions also inform issues likely to be raised by the industry which can be addressed in guidance or website content.
18/08/2022	Official-Sensitive: Commissioner Update (25 July - 8 August)	...we drafted correspondence to Damian Collins MP to thank him for his support with the ongoing Customer Interaction work.
19/08/2022		In the meantime the socialisation with DCMS of the consultations will continue. It is likely that the ██████████ and the customer interaction consultations will prove more challenging for us. This will also be relevant in terms of how we proceed with the other consultations.
23/08/2022	RE: Various	Yes, though customer interaction is by far and away the most controversial thing we have ever done, in the industry's eyes, and I have little doubt that off the back of falling revenues (and increasing anecdotal evidence of accounts being restricted as operators realise they cannot carry on as they were) we are now seeing some sort of realisation that profits in the UK market cannot be sustained at previous levels whilst also being compliant. We've now also had a letter from the BGC asking for a delay on the implementation of the planned changes due in September, where bonus offers are supposedly the most difficult parts. Again, this seems to be an effort at the last minute to stave off the measures that currently allow the worst excesses we see in cases.
20/09/2022	Official-Sensitive: Commissioner Update (26 August - 7 September)	External communications –We continue to prepare communications for the Customer Interaction consultation and LCCP changes and continue to be in dialogue with DCMS Communications regarding a variety of issues.
08/12/2022	Official Sensitive: Commissioner Update: 21 November - 2 December	The Commission's remote customer interaction guidance consultation went live on 22 November and will close in January. Consultation meetings are planned during December. In September, the Commission introduced new, more prescriptive, customer interaction requirements for remote operators. Last week we launched a consultation seeking views on proposed guidance in relation to these new requirements. We are keen to hear from stakeholders about any experiences of the

		<p>implementation of the new requirements and about any ways in which the proposed guidance could be improved.</p> <p>...we provided an update on recent customer interaction work...</p>
18/12/2022	Tweet from Racing IV (@RacingIV)	<p>Racing IV (@RacingIV) tweeted at 10:24 am on Sun, Dec 18, 2022:</p> <p>"I think it's a disgrace!"</p> <p>@SenseiChanning lays into the Gambling Commission! #LuckOnSunday</p> <p>@ABE_Dubai https://t.co/B5V3ini3Tj</p> <p>(https://twitter.com/RacingIV/status/1604422310592659456?t=NAVq7akNenyZNUl4dm94sO&s=03)</p>
19/12/2022	FW: Tweet from Racing TV (@RacingTV)	<p>Hi,</p> <p>I saw this last night. I have seen a few clips of this chap laying into us, mainly around things like affordability etc, as this one is. He talks about us never going on a series of outlets - all racing based - and I wondered if we actually had been invited and declined? I'm not necessarily suggesting we do attend-we'd have to think hard about that as it might be a hiding to nothing. There is a narrative building in the Racing Post and elsewhere that pretty much all of racing's woes are down to the GC and affordability checks we have imposed. I think racing's issues are wider than that, but we have not 'imposed' affordability checks -this is what the industry is doing in response to clearly unaffordable gambling found in the worst of cases. If 85% of GGY comes from 5% of accounts, then any taper in that by operators could have an impact. This might suggest that racing has been benefitting from unaffordable and harmful levels of gambling for some time. Or it might not - there are several pointing to this singular issue when there are broader issues.</p> <p>The narrative about affordability checks is one I think we might need to push back on. I think the reality is that some operators don't think they can continue to make money in the way they did and remain compliant and not see the extreme cases we have highlighted. Our Compliance and Enforcement Report from 2020 gives us a bit of a headache here. The industry always seeks prescription, whilst simultaneously telling us the prescription is wrong, and in that report we said that a way of addressing affordability concerns is through payslips, bank statements etc. This was not an instruction but nonetheless I think several have decided this is safer than doing something not suggested by the GC. If we have UK Finance soft financial</p>

		checks, this starts to reduce but in the meantime there is a misleading narrative out there, which we are not currently challenging. One for us to discuss, I think?
19/12/2022	RE: Racing Post - deadline 4pm	<p>Thanks,. I'm not sure it is worth altering the response and drawing the question of why we altered it, but my only temptation is to add:</p> <p>The Gambling Commission has not introduced or imposed affordability checks on the gambling industry. The regulatory system for gambling in Great Britain allows operators to set their own thresholds for checks and evidence requirements, based on their own assessment of risk. Any checks being undertaken are based on the operator's own decisions about risk and when intervention should take place. I don't feel strongly inclined to add it, but I do have a concern that a narrative is being constructed that we have introduced something we have not, though we are clear that previous efforts have not eradicated the extreme cases we have continued to see in our casework.</p>
23/12/2022	Official Sensitive: Commissioner Update: 5-16 December	<p>...the thrust of it is the continuing turmoil around what affordability requirements the white paper might bring and the issues the industry has caused itself through its own attempts to address the issue.</p> <p>External communications –However, affordability checks continues to be an important issue especially for the Racing Post and other racing media which have attempted to draw the Commission more into the argument ahead of the GAR White Paper. We resisted that and stuck to our previous lines.</p>
13/01/2023	RE: Official Sensitive: Commissioner Update: 19 December 2022 - 13 January 2023	We conducted a consultation meeting with BGC remote operators on the remote customer interaction guidance consultation ahead of the consultation closing date of 23 January. The session allowed operators to share experiences of implementing the requirements which came into force on 12 September and discuss suggestions for future iterations of the guidance.
01/02/2023	Official Sensitive: Commissioner Update: 16 - 30 January 2023	The remote customer interaction guidance consultation closed on 23 January, we received over 50 responses to the consultation and an initial review has been completed in order to update the Board for the February meeting.