

ABSG Board 10 September 2020 – Informal Notes of the Meeting

Apologies: None

Introductions, chair's update, and horizon scanning

█████ welcomed █████, and █████. The Group noted that advisory groups now fall under the Governance team within the Commission following a recent structure change.

It is assumed that the November 2020 meeting will be held remotely and given the business at hand suggest a 10am to 2pm meeting. Items will include an update on patterns of play research and █████ on advertising.

Minutes and matters arising from July 2020

█████ noted that the June minutes did not include a record of the discussion which occurred under AOB regarding the changes to the conflicts policy. It was understood that the policy change was implemented to reflect a greater distance from industry in terms of representation on the Board. The Group noted the concern that the fact that the issue was raised and discussed should be recorded in the minutes in the interest of transparency. █████ advised that the June minutes would be updated and circulated for agreement prior to publication.

Professor Samantha Thomas, Deakin University, Victoria

█████ introduced █████ and invited the group to introduce themselves.

Presentation shared and discussed - Responding to gambling related harm in the online environment.

█████ which covers a range of gambling research. Strict policies in place around industry funding. Focus is on a public health rather than an addiction framework. Commercial and political determinants, de normalise gambling.

Looks at a continuum of gambling harm, in contrast to addiction models. Regulation and policy approaches look from recreational to problem gambling and everything in between. Research looks at a range of different issues – public health advocacy a key theme. Draw on other areas of public health e.g. WHO framework convention on Tobacco Control. Use as a historical template for current harm responses – focus on the highest standard and paradigm shift in regulatory strategies to address. Demand and supply reduction.

Examples of reducing harms online in Australia

- 35 Licensed operators (not including on course) whereas GC has over 1100 remote gambling entities.
- Interactive Gambling Act (2017) – prohibits online casinos, slots and in play
Civil penalties for individuals in contravention of the Act
- Structures used to prevent access to illegal offshore sites – restrict supply and drives down demand. Not significant evidence that regulation leads to black market access
- Two COVID19 studies – all land-based gambling closed. No evidence of product switching during COVID19, evidence shows people missed the social element.
- Protecting the consumer and reducing harm: Strong and consistent regulatory environment, protecting those who may be vulnerable, concerns primarily around marketing re: normalising gambling for young people, connection to sport, reducing perception of risk associated with gambling.
- Long way to go on the marketing

What more could regulators do?

- Regulatory curbs on below the line marketing – prompt and nudge behaviour. Little visibility on mapping and monitoring how they are being used.
- Inducements/VIP schemes often offered directly- text/email
- Prevention of young people's exposure to advertising – WHO defines as 15 to 24. Little movement on achieving this. YP caught in the crossfire of saturation advertisements.
- Australia banned advertising in live sport up to 8.30 but had little impact as still seeing adverts around the game, and on social media. Suggest regulators requires that industry must lodge below the line schemes with the regulator.
- Mandate clear information about products and outcomes. Australia Productivity Commission recommended highlighting the risk and high intensity nature of some products.
- RET funding system – industry should not be at the table or have any decision-making powers
- Clear reportable metrics as part of licensing – use and placement of harm messages, number of affordability checks, deposits refused, accounts closed or restricted on that basis, underage gamblers Identified and refused.
- Clear and transparent framework for monitoring industry practices and system related to sanctions.
- Industry will always try to find a way to get around the regulations .

Detailed study with Experts by Experience (EbE) – priority areas identified as:

- Measures to protect consumers – stake, time, affordability, risk of harm classification, product design
- Limits on advertising, promotion, and sponsorship
- Changing personal responsibility and responsible gambling discourses: language around responsibility damaging for some groups
- Structures for independent RET and advocacy.

Lessons in translating evidence to policy

- Research must come with viable solutions
- EbE can help us challenge existing beliefs
- Regulators regulate not mediate between reform and industry
- Statutory levy for RET to ensure independence from vested interests

Discussion and Questions

Happy to share lived experience paper with the Commission. It sets out structural things that EbE think need to happen for them to have a meaningful role in research:

- Defined EbE
- Trust – mechanisms to build trust. The Commission is taking a step forward to that
- How we help EbE move from self-advocacy to self-determination. A decade ago, rare to hear people speak publicly. In Australia lots of women now active in advocacy, although only one woman in completed study so not representative. There is a movement now and there is conflict around those who accept industry funding and those who do not. Self-advocacy well established, now need to move to self-determination. Not just about their story but ways to move forward.

█ – Health and Social care alliance in Scotland is working on that

In response to a query about lotteries in Australia and how those sit within a public health framework, the group were advised that Australia does not have a national lottery, only state-based schemes. Some have embraced public health harm prevention – for example, Lotteries West who also run health promotion foundation. Lotteries fall off the radar as seen as a soft form of gambling, just published a paper 4-5 weeks ago on harm. There was an increase under COVID19 on lotteries and scratch cards.

There is a difference between addiction and public health models – they are not incompatible but public health is a population response rather than an individual model. The public health approach includes treatment but the big shift using that model is the uptake of research looking at industry practice and the role of policy rather than just socio-economic factors. The Gambling industry is the key vector of harm- look at that and work out how to build protective mechanism.

Lotteries would sit within that same framework - however there are exemptions around lotteries and a lot of advertising exemptions are in place to consider the lottery. That skews attempts to curb all gambling advertisements.

█ the game changer with tobacco was the WHO framework convention which brought in the United Nations and shined a light on practices in developing countries. █ noted that understood WHO is doing some work on gambling at the moment, can find out and come back to you on that. In her view, not sure that we need a framework convention yet, or that industries would allow one but does give a historical template to use to think in more creative ways. We are starting to see some global interest – the WHO/Lancet/UNICEF report on children talks about gambling in respect of marketing practices. Having gambling sitting alongside alcohol, tobacco, and junk food as a risk industry for young people helps.

█ the focus from recreational gamblers through to problem gamblers and need to get better at understanding participation. Advertising, normalisation, alignment with sport – interested in mapping of marketing strategies might go some way to improving wider understanding of culture of safer gambling, and the subconscious emphasis on it being a choice. Mapping exercise would show how people are targeted and drawn in.

█ I started looking at gambling marketing in particular █ The first piece of mapping work was to sit in the stadiums and map the incidences of gambling logo, and this has been replicated elsewhere. Work expanded as marketing strategies have changed – firstly around normalisation of betting and peer behaviour and now most of the messages are inducement based. Work has involved mapping the advertising and talking to children about what they see and how they interpret and apply those messages. Starting to see similarities with tobacco – brand loyalty, recall of brand colours, concerning – 75% of children think gambling a normal or common part of sport, inducement promotions create a perception that there is no risk attached to gambling. One of the reasons for strong restrictions is that inducements suggest there is no risk (money back/free bets).

The channels through which companies can reach young people are many – should focus on exposure, not targeting (targeting difficult to prove as have to show intent). Even education programmes for young people have been presented as ensuring young people have a pleasurable gambling experience when they are older.

█ lotteries and scams - quite a big problem with Australian lotteries. Individual states license the lotteries, are they receptive to working to support people around gambling harm, how do you manage and influence them?

█ – one of the complexities as state and territory level for lots of types of gambling. Can find out for you.

■■■■ – trying to get people to recognise harm has been a challenge in Trading Standards, how have you challenged those opinions?

■■■■ – Trust point is fascinating. Role of ABSG is to help the Commission win the trust of the EbE. Public health approach is the right one, but tobacco and alcohol has been a long journey, but if people bet safely and well that's fine, Affordability checks for me are an immediate measure.

■■■■ - Australia does not have a strong regulatory framework around affordability. **Some consumer protection work has been done, will send a copy.** In my view this is how the UK could be leaders in this space around affordability and stake limits online. We did not go as far in Australia as we should have but the UK has an opportunity to lead now. We are not anti-gambling but doing everything we can to prevent harm.

■■■■ - lodging below the line advertising with the regulator and sought clarity on the in-play betting ban in Australia. ■■■■ confirmed this is the case but there is a loophole where in play bets can be placed by phone. Online considered too risky. Regulators acted on click to call buttons added to apps by industry. Believe that the in-play ban led to companies leaving the Australian market.

■■■■ – any work done on mandating clear information about risk?

■■■■ no ongoing work through a national consumer protection framework on consistent messaging across all companies but need to see outcome of that. Need to get away from assuming responsible gambling message is enough in terms of counter framing. During COVID19 new safer gambling ads still had high levels of brand promotion.

■■■■ moving from self-advocacy to self-determination key issue for the implementation groups. Good at asking people to tell their stories, early days around evaluation and research, would be great to connect.

■■■■ very clearly even for EbE who have had no training, response on what needs to be done are very similar to what is coming out from public health.

■■■■ closed the session, thanked ■■■■ and agreed follow up actions.

Gambling Review/Online Gambling Controls

■■■■ and ■■■■ joined the meeting and introduced themselves.

■■■■ updated the group on the potential scope of the Gambling Review, based on the DCMS drafts that have been shared with the Commission. The review will potentially cover:

- Online protection (including product rules and tech to reduce harm)
- Advertising and Marketing
- GC powers and resources to regulate effectively
- Options to fund research
- Consumer redress arrangements
- Age limit for society lotteries
- Age limit for other forms of gambling open to children
- Continued suitability of changes to land based sector post 2005

In response to a query about the scope of the review, ■■■■ explained that what is proposed will not be an independent review in the manner of the Budd review. It will be ministerial led, and the current plan is that it will be launched around October 2020 with a document explaining the scope and a call for evidence. A white paper and consultation will follow but likely not until the summer of 2021. Commission advice will be specifically commissioned by DCMS so we may not have flexibility in

timing and scope and have not considered yet exactly what role ABSG might have in assisting us with that advice.

██████ there is a possibility of the patterns of play research informing this work. It is hoped that research findings describing how people play could be available for February 2021 as a slide pack and headlines. The next phase – the link to problem gambling – will be another year.

██████ - the paper includes a range of questions which could not be answered today but were opportunities to signpost on specific points. On question 12 in particular, could ██████ signpost on minimum unit pricing for alcohol.

On a point regarding a levy and the recent levy advice, the group noted that they were keen for this to be published. ██████ noted that the Commission are still finding their way with what officials may have in mind regarding a levy within the scope of the review.

In response to a query, ██████ explained that whilst the paper presented was particularly focused on stakes, wider issues around product characteristics – such as speed of play and near misses – would also be considered.

██████ - the review covers Great Britain.

██████ - on minimum unit price, alcohol sitting in health has allowed the devolved nations to take their own approach which has given a lot of opportunities for research. Gambling approaches could not be applied differentially in GB. ██████ suggested that it would be worth testing with DCMS to see what may be possible to trial and evaluate options.

██████ – ██████ has published in the International Journal of Environmental Research and Public Health an evaluation of minimum unit pricing of alcohol. Would be keen to build in evaluation of policy. Looking at question 8, welcome thoughts on how ABSG can help on these issues around staking behaviours.

██████ - suggest that there might be some cross learning re: scam and victim profiling. Can share information on differentiation around vulnerability to scams and risk levels.

██████ - FOBT stake limits showed the principle that reduction in stake limits reduced harm. Concerned about the balance between political reality and evidence-based approach which sets stake limits on FOBT and does not have the same online. ██████ advised that the Commission carries the scars of trying to balance evidence and political considerations from the last gambling review, where we advised that the stake limit advice was around a range from £2 to £30.

██████ - on the evidence base, I'm disappointed that the Government still has such a strong focus on stakes because I think the evidence is that you can't just look at one dimension of the decision that gamblers take and if you don't look across the board at speed of plays and volatility that's when you have the greatest risk of harm. A paper from Finland looked at online betting through the prism of prospect theory. One of the arguments of prospect theory is that gamblers, like other people, have a loss inhibition – they do not like losing so emphasize getting back losses to get back to where they were. When gamblers ran into losses, they changed their strategy. Before this paper the consensus was that they take more risk. This study looked at the odds that they chose and found systematically that in a loss situation they switched to higher stakes on shorter odds – low risk style of play, high risk in stake size. Gamblers are not just one dimensional. Low stake limits in this case might mean they could only get back to their starting point by betting at long odds which might be less desirable. It would have to be modelled to predict where it would all end up but illustrates many dimensions and to focus on one is potentially dangerous.

█ - the previous review considered unintended consequences like longer play due to stake restriction. The findings discussed are consistent with a discussion with EbE about this; their view was that as they ran short of money they would switch to longer odds with smaller stakes, but the point is consistent in that the style of play changes to recover losses.

█ – Evaluation is really key and Public Health teams funded by the NHS could be commissioned to do that. On the issue of stakes, having heard what █ talked about can we suggest that some of these are just prohibited as in Australia. e.g. online casinos and in play betting.

█ – raised the question on in play betting and whether that is time to talk about again?

█ - the scope is broad and the call for evidence is so could well be in the frame. The other things █ mentioned were in relation to characteristics of play, we will want to emphasise the importance of the whole customer journey. Points of decision before during and after play for customer and operator interaction.

█ – Was going to pick up the gambling customer journey. In a public health context, much of reducing gambling harm is a much broader spectrum than just problem gambler. Wider recognition of people's lives and the impact.

█ – examples of interventions that have been very successful in addressing wider determinants.

█ - █ mentioned suicide, and Gambling with Lives have been keen to push measures and messaging along the same kind of lines as tobacco. Is tobacco unique in that mandatory health warning messaging?

█ – yes, I think it is. Tobacco is unique in that govt had decided it should not be treated as an ordinary commodity, but aim is to abolish it rather than just make its use safer.

█ – █ spoke earlier about the importance of independent messaging and the evaluation of those. Board members can provide very specific advice on some of these questions, and ABSG has got a lot to say on this – we need to think about how we can help to support and feed into this. Need to think about gathering evidence and recognising the political context.

█ – On logistics – there is clearly a vast scope for the review. Consider if groups within ABSG may want to focus on particular issues. █ and █ to discuss further to break down the advice questions.

On policy, ABSG has given robust advice and one of the constant challenges has been the framing of gambling as a normal and legitimate activity within the 2005 Act. Wonder whether there is an opportunity to comment on the higher-level framing of the product. Where does that sit in the advice?

█ – Any sense of gambling moving out of DCMS and into health?

█ – don't think that is on the table. On the policy framework, I don't think that some of the fundamentals of the framework are going to be addressed e.g. the way the Act is framed around the objectives and specifically permitting gambling in so far as it is reasonably consistent with the Licensing Objectives. In terms of tone we must aim to permit – think there could be a repositioning as to what constitutes reasonably consistent but not a full reframing.

█ – pressure to do something different in relation to online harms. For ABSG to point out the limits and the risks is really important.

█ – fair amount of scope to shift the balance more toward protection through the review.

█ – share specific details/evidence now.

█ - thanks and subgroups will help, will need to focus your fire within the issues raised to where you can have the most value.

████████████████████

Key points for █ to raise with Gambling Commission Board

█ revised paper on workplan is available.

Three recent workshops held with participants from ABSG, EbE, Exec and Commissioners looking at three statutory objectives and the metrics which might be attached to the them – fair and open, protection of children and vulnerable individuals from harm, and gambling and crime.

What to bring to attention of Board?

█ - measures and metrics – covered in the progress report, but █ very keen to land with up to 9 metrics to be worked through and taken forward. The Commission is under huge pressure to demonstrate own effectiveness and be clearer about how it is reducing harm.

█ – attended the first workshop, really concerned that there was a comment from one of the Commissioners that the session was not about safer gambling, that was next week. Need to be clear that safer gambling is a thread that runs through all work. Would welcome push back on that point.

█ - How do Board see the relationship with ABSG playing out? There is more and more contact, would be interested in their views as to how we could be most impactful and how we help the Commission grow as a trusted regulator.

█ – Will try and turn it into a question for Board.

█ – Overarching question – the paper covers the processes about the ABSG publication, and Commission response – what happens next? Having heard from experts, can they share the process by which they reach their decisions and what do they do with the advice given? In the past, do not always know what has happened or a different route taken. Would like a sense of the process by which they come to their final decision.

█ – take the point on closing the loop and looking to ensure that we are doing that. The principle of the Commission receiving and considering advice from multiple sources – try to playback some of the stumbling blocks that the Commission may be facing e.g. the issue around framing. 4NL advice had some correspondence back from the Exec Director. █ and I are exploring more of a workshop on the progress report with some of the senior people to talk through the recommendations.

█ – █ is right in that a workshop or a follow up may be more effective in measuring and gauging impact rather than a written response.

█ – complicated. Really pleased to see the workshops happening, would just like more clarity on the loop.

█ – Section 11, a bit opaque on effectiveness and value. Effectiveness will be a function of the extent to which the advice is acted upon. Will become increasingly an issue for EbE around value and influence.

█ – Section 11 is a holding place?

█ – new heading in our paper template and many people in the Commission struggle to articulate this in a way that is meaningful. There is a more intangible point around changing thought processes and conversations.

█ – EbE work was something that we felt very strongly about and had active involvement in. Important that it has happened and ABSG had a part in that. More about the feedback loop and understanding the process of what happens.

█ – methodology around seeing what works and I will share that.

█ – Quite worried about what has just been said. Effectiveness is one of those positive words. If it is to be measured by how much difference we make to the final decision that might compromise our integrity. There might be circumstances that we do not expect that the advice will be taken – should still give best advice and best evidence.

█ – it is not and/or, would be good to know the uptake rate to understand how you do change policy and practice.

█ – have taken points to incorporate into my presentation, have some points to circulate for feedback via email on:

- New structure
- Earlier views on drafts
- Levy advice on clarity on publications
- Metrics and what matters to other stakeholders

Board asked last year about 3 priorities – I said address structural challenges around RET, increase transparency to stimulate further improvement in industry safer gambling practices, and invest in mandating digital solutions for tackling online harms.

Outline workplan – other things coming in. Letter from █ asks do we still want to be involved on the Lottery. Need to be flexible enough to say yes, we will respond.

█ – would add EbE – how are we measuring that? I am not clear on what we are measuring and what we are expecting outcomes to be.

█ – Alliance is working on this, have commissioned review based on contribution analysis methodology. Developing what the measures might be involving people who have lived experience. Need to read across through to the National Strategy. Might be helpful to bring someone in to talk to that. Sharing ideas and involving people in setting measures.

█ – our work is looking at effective and early interventions and measuring their wellbeing. We have done an academic wellbeing study on call blocking.

█ – need to have some more time on this.

█ - what █ said is really important, people need to have a role in co-production. Should that also include policy makers?

█ – very keen to follow up on evaluation of the EbE group. Interim group measure was to help co design long term arrangements. When we move to permanent group that is a good reminder that there are some expectations to set and will follow up with █ and █

█ – work with financial institutions – can engage around behavioural change with the banks as on some of those groups.

Input to review of data collection and research methodologies

██████████ joined the group and introduced himself. ██████████ and explained that the Commission has agreed to deliver a review of participation and prevalence research.

Existing issues

- Current main measures on problem gambling are health surveys. Have a number of issues – including different vehicles for England, Scotland, and Wales and not always possible to combine those for GB. Currently referring back to 2016 for GB wide data.
- Also have quarterly phone and online surveys. More timely data but means multiple versions of the truth.
- Not consistency in the question sets across the surveys. Health survey is participation over the last 12 months. Phone survey is past 4-week behaviour. Definitions of activity vary.
- Long turnaround time for health surveys – fieldwork throughout the year, access to GC takes at least a year after completion.
- Impact of COVID19 on face to face interview techniques. Aiming for a more modern and future proof approach.

Aim to publish initial conclusions by the end of Q4 this year, planning to consult in due course. Welcome any initial thoughts and feedback. Review so far has looked at other official and national statistics and a few examples have moved from face to face towards mixed mode methods whilst retaining random probability sampling e.g. Sport England Active Lives, ONS, DCMS Community Life – the Commission may be behind the curve but need to ensure that methodology refresh is done carefully and any new approach is piloted.

██████████ – would you be looking for Commission only vehicle, or another survey? When the Commission moved from using the BGPS there was a lot made of having the more regular telephone surveys as a way of monitoring movement and trends – has that been helpful?

██████████ - the phone survey fills the gaps between health surveys which only happen every 2-3 years. Ideally, we would want to bring everything together. Space for us to adopt a wider range of metrics which we control. With health surveys, small space on a far wider survey.

██████████ – Lots of potential benefits to the GC taking control of data collection – could be useful to take a longitudinal approach and a wider range of people. Have concerns that if this is pulled in house objectivity could be lost, and there is some strength to gambling being included in health and general population surveys. Would be keen for gambling measures to be retained in general surveys.

██████████ – Terminology at the start of the doc around participation and problem gambling prevalence – could lead to some confusion. Incidence also important in looking at prevalence. Online survey – really helpful if all the demographics are published with the results. Health surveys – not sure I completely agree with the national view – for me that is one of the problems with the gambling metrics which can hide worrying differences. It is one of a range of sources. Timeliness – most robust reporting takes a year in my experience in Public health. Quality is key and considering a range of sources – work not done in house has legitimacy. Would rather have more granular geographical data.

██████████ – I would go back to the switch from BGPS to the Health survey to ask what lessons have been learned from that switch? Both gold standard in random testing. The headline resulting from that change was a significant drop in change of prevalence, and it is known that Gambling specific surveys may exaggerate prevalence rate because they attract.

Obvious way would have been to run both to understand change in trends from the change in the vehicle. Think it should be a priority to consider how to manage this so that we can have confidence around looking at long term trajectories?

Health Survey – gains as gambling data could be linked to range of physical and mental harms. Not been exploited, do not know of anyone using the gambling data alongside the health data.

Health survey inadequate in the participation side and lack of frequency data by activity – big loss in understanding where harm lies. Need to clean up the definition of activities. Offline separates dog, horse racing and sports whereas online is only online bookie covering all activities. Frustrates ability to look at horse racing – on 12-month participation has low rate of problem gamblers but looking at weekly very high rate with median PGSI of 11 – In Australia most weekly horse gamblers are problem gamblers.

█ – You mentioned ONS Opinion and Lifestyle survey. ONS has a huge resource – will that be considered? Detail of what you ask about – Dept of Transport e.g. on RTA can be broken down not just by region but locality. Greater specificity and data breakdown would be useful. Benefits to the Commission taking control but specific disadvantages to removing from an independent org to run it.

█ – Would agree with the ideal of a robust survey which allows us to drill down. Much of this is dependent on the funding available to the Commission – had in mind our existing budget which factored into options. There are advantages in being part of an independent survey and completely far that have not made enough of looking at those comorbidities – something we would still like to do. Significant disadvantages for us are as set out in the paper.

█ – █ noted how impressed they were in Australia with Gambling Commission stats to your credit.

█ – welcome the point at Number 9 around seeking views as part for the consultation. Ensuring consultation formally goes to EbE groups would be good.

█ – next steps. Detailed notes will be circulated very soon after the meeting, so please check that and note any changes so that we can get that to Matt and look at the best way to get back to you.

█ – could multiple vehicles be run?

█ – yes, dependent on funding but would also have the issue of different figures to different metrics

█ – If you can get gambling measures on the Public Health Outcomes Framework, funding is not a concern. Gives it some external legitimacy, really concerned about the in-house approach. Do not know that COVID19 is relevant for not continuing with it. Hope we have an opportunity to provide a counter argument to taking in house.

█ – I will pass on contact details for PHOF.

█ – █ and I will discuss next steps and how I respond to you.

8. Any Other Business

Meeting again in November 2020.

█ – update on patterns of play. GambleAware have decided that operators have to the end of this month to produce data. The schedule set out is two months for NatCen to data clean then three months for analysis so will be January before can report substantive findings. Board should know that Camelot withdrew from the project.

■ – to check dates for workshop with ■

Actions to be noted and circulated

■ to share a short note of planned discussions with Board.

Reflections on the meeting

Could the Commission sit in on expert advice – would be useful for ■ to hear ■ presentation.

■ – Presentation less useful – but for speakers who might be useful to the Commission could we out with the meeting have a Board with Commission invite webinars. So, the people who come and tell us about what they are doing would do so outside the meeting and with other stakeholders in the Commission listening.

■ – interesting idea, depend on people's appetite for diarising. Our research team keeps a research brief so ■ would not be unaware, and ■ will be talking to the EbE group.

■ – Forward the Research brief.

■ – happy to do additional webinars. Value with us as a Board alone having some conversations.

■ – thought the meeting worked particularly well. With the breaks and the interconnectedness helps, and value bringing people in. Would be happy to make time to do different things.

■ – will circulate a link to the advice on stakes as the arguments may have parallels.

17.11.20 Notes

█████ welcomed everyone to the meeting and thanked all members for their work and contributions recently. It is important that ABSG is involved in this work but acknowledge the logistics involved and that there is a need to improve timings and deadlines.

█████ noted that some inputs have been requested at short notice, and that he is aiming to set out a clearer view of where contributions are needed and plan and organise this more effectively.

█████ noted emails this morning asking for updates on single customer view, industry challenge, games design.

█████ will review and get a more considered response back within the next week. ██████ will pull together a summary response about how inputs into the Game Design consultation have been used to explain what has happened. On Single Customer View, there has been a blockage around BGC and ICO and there is a meeting to resolve them and to have a look at piloting that soon.

In response to a query on the timing of the Single Customer View work, ██████ advised that there was no definitive answer as yet. When proposals come in from BGC will be questions as to how quickly can be put into practice but no timescales are set. There is a possibility that individual operators may be ready to move faster.

Action: Keep ABSG updated on progress on Single Customer View

1. **Declarations of Interest**

There were no new declarations of interest,

2. **Introductions, Chair's Update and Horizon Scanning**

3. **Minutes and Matters Arising**

Actions Item 6 (5.1) and update from ██████ on Commission Board Meeting. Notes shared from the Board meeting, and ██████ noted that:

- Heard from ██████ and ██████ that would like ██████ and ██████ to attend more often and contribute to specific topics at Board.
- ██████ made the point that metrics are the biggest opportunity and the greatest risk at the moment.
- ██████ felt that the industry was moving in the right direction and many more signs of progress, but there was a need for the Commission to think more carefully about influence at Board level.
- ██████ and ██████ both felt there was an appetite for engaging with the Advisory groups and think that once the EbE chair is there as well the 3 chairs will shift the focus more towards safer gambling. Aim is to ensure that Safer Gambling is the golden thread which runs through everything.

█████ asked ██████ to expand on what was meant by metrics being the biggest risk and challenge. ██████ advised that in her view this was about getting them right. The Commission is twitchy about setting metrics for itself on suicide prevention, and think ██████ is concerned that the Commission doesn't set itself up to fail. On the back of the very public criticism of

█████ reflected on a 2009 Panel on influence of commercial world on children and young people's wellbeing, and work completed by Sonia Livingstone work on advertising impact on children's eating behaviour. Research in this area difficult to carry out practically and ethically (experiment or longitudinal). The finding was that advertising causes 2% of childhood obesity. █████ asked whether it helps us to know that. It is known that advertising is a social and cultural factor amongst factors, and we know that advertising works.

Four ways in which advertising works:

- Brand advertising creates strong emotional bonds with consumers (Building Strong Brands - David Aaker and Buy-ology Martin Lindstrom)
- Most advertising reminds rather than propels us to action (Andrew Ehrenberg)
- Advertising holds up a distorted mirror to society (Richard Pollay) and acculturates our values (L.J Shrum)
- Advertising creates false consensus (Roger Bennett) Study on football hoardings – overestimates market share of the brands advertised. Likely to think many more people gamble than actually do.

2014 UN Panel⁵ looked at whether advertising infringe cultural rights. █████ noted an example which suggested that states should have a role in protecting people from undue levels of commercial advertising and marketing.

Digital Marketing and Advertising

- Not mentioned at all in CAP/BCAP response because advertising regulations apply equally online and offline. █████ disagrees that regulations can be media neutral. The House of Lords report on UK advertising in a digital age noted a quote from Marc Pritchard of Proctor and Gamble that the “media supply chain is murky at best and fraudulent at worst”
- Advertising Supply chains involves myriad different parties
- ASA CEO noted that evidence on exposure to advertising for children and adults online has no agreed metrics.
- Children of the 90s⁶ study – especially an issue as young problem gamblers gamble online. COVID19 study shows that online gambling has increased.

Esports and Esports gambling

- Reach of 454m
- Market worth £1.27bn
- Betting increased 3000% during lockdown
- Betting market worth £9bn
- League of Legends – 44m viewers with average age of 26
- Most organic esports tweets contravened one or more sections of the CAP code
- Many of these companies were not licensed in GB and therefore outside of remit of GC/CAP and BCAP

⁵ [‘Cultural Rights’](#) UN General Assembly, August 2014

⁶ [‘Avon Longitudinal Study of Parents and Children’](#), University of Bristol

What protection is there from non GB licensed operators?

- Can non UK gambling accounts really be geolocked?
- How many gamblers use VPNs to circumvent geographical controls and limits?
- Can gamblers technically self exclude from all digital adverts?
- What parties need to be involved to make this work?

Social Media needs special attention

- CAP and BCAP have addressed influencers
- 40k children following gambling advertising – new for advertising
- 7% of followers of traditional were under 15, 66% are 16-23 and 27% over 24
- Esports 17% of followers under 15, 28% of engagement by under 17
- Sharing of tweets – ratio for exports is 10:53. Content is made to be shared. Have not thought about regulating sharing and don't have sufficient evidence on it.

Q&A

■ – I agree on advertising effect and assumed they would not do it if it wasn't effective. Interested in your data as it is different to what the Commission often reports as participation data – would be interesting to compare. Social media – a new generation, and interested in sharing and likes as giving credibility or a recommendation.

■ – There has been done work on sites like TripAdvisor and how feedback from normal people works. Body of evidence being developed. Not aware that there has been a review on the impact of likes, and the psychology of how a like works.

■ – introduced recently to the concept of influencers and understanding how people position themselves. That's a whole new thing.

■ – The House of Lords Select Committee had ■ giving evidence. Advertising regulators have taken notice and have acted. I don't know if there has been any research that demonstrates the influence that they have.

■ – to support some of the stuff of customer reviews, there was some research on good traders schemes. There was some work done around the value of [reviews and endorsements](#)⁸.

■ – question in relation to some of the work ABSG is likely to get involved in. Marketing and advertising likely to be a big issue in the Gambling Review. To what extent is the current framing of the Gambling Act and gambling as a leisure opportunity an issue?

■ – Gambling is a legal leisure activity. The GambleAware research says people don't like being bombarded with gambling adverts and they say they ignore it – but it still works. Is it an activity that is fine, or is it not? It's framed as a leisure activity and advertising is acculturating us to think it's normal. Especially in relation to sports, we have to decide if we want our culture to be sport=gambling and especially esports=gambling. Do we want them to be synonymous?

In response to a query about organic. Tweets, ■ advised that these are messages originating with the company. Paid adverts are targeted at specific groups. Difficult to research those. Need to

⁷ ['Oral evidence on the advertising industry'](#) House of Lords Select Committee on Communications, December 2017

⁸ ['Online reviews and endorsements: Report on the CMA's call for information'](#) CMA, June 2015

unpack programmatic advertising as those are the targeted ads. Research can be done - CAP and BCAP are using avatars in their work to research and see what type of adverts are served. There may be more computer scientists who know about this.

█ – █. People expect an advert to try and influence. There has been work by Mark Petticrew at the London School of Hygiene on the use of social responsibility⁹ - messages are set out as protection but are actually advertising. In gambling, the slogan 'when the fun stops, stop' – makes a clear link between gambling and fun. Purporting to protect but in fact doing the opposite.

█ – if the gambling industry is saying don't do this, getting the authenticity right between socially responsible and hard nosed and commercial is tricky. The idea of authentic is particularly strong with YP – inauthenticity is an absolute no no. Done quite a lot of work on implicit advertising – it's not a rational medium. It works emotionally. When the fun stops, stop is a classic – all it does is say that gambling is fun, classical conditioning. Pavlovian association.

█ – has the industry been called out on that? They seem to take pride in putting it on their adverts?

█ – There is some work by Philip Newall¹⁰ on that message – I think it has been discredited. █ address to CEOs last October¹¹ said that the evidence and the impact is just not there. We have now had the launch of the new Bet Regret campaign. On credibility, on the positive things the Commission has done is to fund work which started with lived experience (█). █ Could not get more credible than messaging from people with lived experience.

█ – Bet Regret is GambleAware. When the fun stops was run by Senet and has been handed over to the Betting and Gaming Council and we have challenged them to replace that.

█ – Can we have a copy of the slides? Rights approach struck me – the volume of gambling advertising we see is a decision for society. The role of lived experience, the bombardment of gambling advertisement is without permission. Is there any research anywhere where Experts by Experience have been able to challenge that? Equality Impact Assessment approach?

█ – very little evidence as the framing is held by industry. CAP and BCAP are funded by industry. They are regulating a legal activity. It is odd that a piece of research and the way it is taken forward is entirely in the hands of one set of people. I can't think of any good examples where it has been taken forward on rights basis.

█ – the pathway of the companies slide made the point very clearly. Are we seeing any values focus in the gambling industry?

█ – there is challenge, particularly to Facebook, because they are the ones with the power. Trying to hold Facebook and Google to account.

█ – looking for the support among the gambling companies who might be willing to put values and customer as a USP.

⁹ ['Dark Nudges and Sludge in Big Alcohol: Behavioral Economics, Cognitive Biases, and Alcohol Industry Corporate Social Responsibility'](#) Petticrew et al, The Milbank Quarterly, 2020

¹⁰ ['Testing a gambling warning label's effect on behavior'](#) Newall et al (preprint)

¹¹ [CEO Breakfast Briefing October 2019](#), Gambling Commission

█ - two points of general philosophy. I felt that the final points were almost willing us to make the assumption that advertising promotes gambling. I'm not so convinced. Throughout most of the world sports betting is illegal. And yet when we look at participation rates they are very similar to those in a very liberal gambling country. (US participation was within 1% point of UK rate pre legalisation). In those countries advertising is also illegal and we see just as many people gambling.

You say do we want sport and betting to be linked in our culture. In the history of sport they are linked – the laws of cricket were first written down by bookmakers. We come across the same issue which is the tension between wanting people to have fun and protection of those who experience harm. Your question about whether sport and gambling should go together is almost denying that people should have fun. Professional sport is a drama. A principle motive for betting is that even if you have no affinity with the team you create suspense through gambling. An experiment carried out at Yale looked at an ice hockey game and rating enjoyment, with half the participants given money to bet on the game and half not. The people who enjoyed the game most were those who had bet and won. The people who bet and lost still enjoyed the game more than those not betting. We should not deny that sport and betting are complimentary, it is not just current sport is gamified.

█ - agreed, and noted that has given talks on gambling and sport in other jurisdictions. However the image of gambling has not been family fun in the past so brakes have been put on it. Where gambling is illegal there is the same uptake as where it is legal. In this context, it is too early to make conclusions particularly in relation to CYP exposure to gambling. Would there be more of an impact?

█ - according to the various reports esports spend had an increase in period when other sports where not available but latest reports suggest that it is a false dawn.

█ - esports has a lesser proportion of the market but volume increased.

█ - the esports share of betting market in the UK has a remarkably low share compared to other countries.

█ - countries such as South Korea, China and the US are far ahead in esports market share.

█ - a challenge to █ around the singular narrative that sports = gambling and they are inherently linked. That's not the whole thing, in the same way that alcohol being associated singularly with fun is not the only narrative. The problem comes when there is a singular narrative which says that one thing is always associated with the other. The acculturation – need to think that there are a range of things that we need sport to be associated with.

█ - agreed, noting that has never bet on anything and yet can still enjoy cricket. However, we know from analysis from TV figures that for non trivial part of the viewing population getting them to view means that they have to have that betting interest. Most acute in horse racing. A very high proportion of those who attend have to bet to make a day of it. In Horse racing except when supported by middle eastern elites – there is no historical record of any horse racing industry being able to exist without betting. When you get to football – some channels now showing Dutch league matches – quite a number of viewers need betting to make it interesting, and a non trivial part of the demand for sport is underpinned by a complimentary demand for betting on sport. The big lobbyists against advertising bans in Australia and now in the UK are the sports leagues.

█ - agree with █ noting the long history but that we have seen recent changes to culture and behaviour.

█ – a lot of sport would not be there as it can't sell on its own.

█ thanked █ for attending, and █ confirmed that she would be happy to assist ABSG as needed with further work on these issues.

█ – pushback from Commission is this is outside of remit or non Commission based. The Gambling Review is an chance to bring forward evidence. The white paper on online harms – this goes much broader than just gambling. But that’s not a reason for not being quite bold in what we say needs to change here as believe there are lots of people in legislative machinery are taking along the same lines.

█ – key to doing that successful is being really clear about what is the problem we want to solve, what is the evidence and why is the solution the right one? Need to find the evidence that supports that in a balanced way. Shift the dial from where ABSG has been in the past especially around exposure. Need to make the logic clearer.

█ – if the precedent is set in other fields (alcohol and childhood obesity) If there are links in other ways why the need to constantly be proving and providing evidence each time? The call for evidence each time becomes problematic.

█ – if the advice that ABSG were to give was to follow the approach that we restrict advertising for cigarettes you would immediately fall foul of the arguments that we know that smoking is bad for everyone, but gambling is not bad for everyone.

█ – agree what’s the problem, what’s the evidence. The underpinning factor is who gets to decide what is evidence. We need evidence to be seen in the most broad sense.

█ – the good thing about the Gambling Review is that it should be genuinely a societal question.

█ – Good to hear from different voices. On this point doesn’t have to be an either or – there is a need for accelerated high quality research that allows more evidence to emerge over time. I would be very worried if our position was continually we did this here, or this feels right. This point █ raises often is we are the advisory board for safer gambling, not no gambling. What would safe exposure look like rather than no exposure?

5. Loot Boxes

█ introduced the paper and outlined his role and focus at the Commission. DCMS have issued a call for evidence on the loot box mechanic¹² found in video games. The loot box allows a consumer to open a virtual item containing a prize of unknown value. The gambling element is the chance. Loot boxes have become increasingly popular as measure for monetising games. The random mechanic element led to a 2017 policy paper¹³ which set out the Commission position. Since then calls have grown for action on this mechanic and the Commission has been asked to justify our position. We ask for ABSG advice as for some time the conversation has been mainly around what action should be taken. Our question is what is the harm being caused, who is being harmed, and by answering those questions can we move to see what action can be taken?

█ - welcome the paper and note it was interesting that a number of countries have an emerging international consensus that there are some features which are problematic. Questions

¹² [‘Loot Boxes in Video Games - Call for Evidence’](#) DCMS, September 2020

¹³ [‘Virtual currencies, eSports and social casino gaming – position paper’](#) Gambling Commission, March 2017

█ - in gambling we don't understand well enough whether there are particular communities or people that gamble and have a greater risk of harm, whatever the factors. It is important if you want to develop a prevention strategy that you need to be able to target.

█ – talked about looking at problem gambling, perhaps talking about gaming related harm. Our interest is the gambling element. The paper really helped me to understand the nuance and variety of these issues. Asking the question is far greater than a read through into problem gamblers.

█ – it is its own community and imagine that can be quite addictive

█ – research this week on community.

█ – came from the industry and not peer reviewed.

█ found the conversations in the podcast fascinating. They referred to three issues; time, money and speculative value. They agreed it's not appropriate to regulate time. On money, some regulation on CYP spend was something they thought industry would welcome. On speculative value, buying for the prospect of a reward they agreed that should not be allowed to happen.

The need for clearer warning labels, age restrictions on access to paid for loot boxes. Not all Loot boxes are the same. Comes back to vulnerability and public protection against exploitation rather than a prohibition approach.

█ – grateful to █ for the briefing and the bibliography. Heather Wardle published a new paper 2 weeks ago with Zendle ¹⁶ Would caution about whether we will ever get to the bottom of a causal link between loot boxes and problem gambling. Don't think a longitudinal study would resolve it for methodologies reasons. Self selected treatment will reflect non observed characteristics. Independent of that there is plainly cause for concern independent of them and a lot of the points raised have been standard about the interest of consumers. There is a family of such sales tactics. We don't worry much about some of those tactics. We worry about loot boxes as there seems to be a lot of money involved – they can be used repeatedly and they swallow up a lot of money. Would be useful to have distribution of spend but appears there are enough instances that there should be intervention and protection whether through the gambling act or through consumer protection. Don't need to get involved with the problem gambling angle, can attack otherwise.

█ – DCMS immersive and addictive tech – would agree that there is enough to support the idea that the precautionary principle.

█ – interested in the question about definitions in law would be starting position. Should push for that. Games and more broadly loot boxes, struck by what was said about industry and what's next Anticipatory regulation – can we influence that?

Still have scratch cards which can be purchased at 16? That feels like a potential point of weakness.

█ – if loot boxes are not defined as gambling..

█ – the mechanic is a gambling mechanic but under the law we need a cashing out facility. So in Fortnite there is a closed loop, where you can gain a prize but not cash out. Would have to change the definition of money and money's worth

¹⁶ ['Loot Boxes, Gambling, and Problem Gambling Among Young People: Results from a Cross-Sectional Online Survey'](#) Wardle and Zendle, *Cyberpsychology, Behavior, and Social Networking*, October 2020

█ – can you cash out any loot box?

█ – some of them you can and where you can we have taken action

█ – our role around safer gambling, we know that this does harm children,

█ – the focus for us has to be age restriction. We will submit our view to the Commission, not responding to the consultation, quite a broad consensus in the room so will pull something together.

█ – thank you very much. If you have any further comments, please let █ and █ know.

█ – we will summarise the argument and provide the references to recent research. Sure that and █ will send their evidence in.

6. Gambling Review

█ – Slides give a timeline. Gambling Review document will likely be published this month. The first stage of the process will be a call for evidence and the full process runs through to March 2022.

Slides are marked as private and confidential as scope of the review remains in draft. We think this is fairly accurate. Seven topic areas identified so need to consider priority areas for ABSG input.

- Online protections – likely to feature prominently in the early stages of the review. Build on advice given in 2019.
- Marketing and Advertising
- GC Powers and Resources – lower priority as ABSG has already contributed to the Fees Review.
- Research Funding Options – ABSG have already given advice on the Levy and RET. Commission will publish advice once the review has been announced.
█ – my sense is that there is a long way to go within the Commission on the Levy. Keen for our advice to be made public and for ABSG to continue involvement in those debates.
- Consumer Redress – key area where we have an issue at the Commission.
- Society Lottery Age Limits – our understanding is that will become a broader issue on age limits in general.
- Premises restrictions

█ – What are the must haves, what are the red lines and for me land based feels like a really low priority. Feel that casinos are reasonably well regulated.

7. National Strategy to reduce gambling harms

█ noted that there would be breakout discussions for the item.

█ introduced the item. The only thing that is new in addition to the papers is a discussion with █. Papers shared have two areas of focus – looking back and next steps and the progress report. █ had mentioned distinguishing between the role of the Commission and the role of other partners within the progress report.

█ – I did reflect that if you look at the Year 1 Progress report we do specify responsibility for action, but I understand it would help to have a bit more framing around areas of responsibility. This will go on being a slightly difficult conversation because there are differences between what we are here to do and what you are here to do. We are picking up intelligence not just from the Commission but from other places as well. There's nothing personal in our reporting on the strategy, just wanted to acknowledge the tension between the roles.

■ – there will be different perspectives, and that is also true between ABSG and the other audiences for the reporting. There is a lot of value in you being able to take that differing view.

■ – thinking about the different projects going on around treatment, how will they all dovetail together in light of the recent Gamble Aware research brief where they had labelled their slides as the National Treatment Service? In the strategy how will all of that align and how does it fit with the shift in landscape?

■ – from the Commission perspective what we can do in pull together the evidence about all those projects. The gap is who is taking the leadership in driving that forward into a coherent treatment system. GambleAware have gone big – it was always called the National Treatment Service – but they have maximised on that recently, in part to reflect the increased focus for them for treatment above prevention. There are conversations between Health and Social Care – I am less encouraged that there isn't a mechanism like a RET steering group meeting in England. There is a role in relation to Regulatory Settlement projects but ultimately the ringmaster should be central government through HSC and the NHS.

■ – the Social Responsibility fund?

■ – the Social Responsibility funds group is internal and review proposals for regulatory settlements and approves groups who can received those funds. We have now combined decision making into one group.

Group 2 – Board paper, risks, mitigations and how they are being handled.

■ – the paper sets out 5 risks, and you are looking at reflections on the mitigations and then there is a section linking our priorities to the work. The framing is helpful. What struck me (■ had the same thought) – the whole issue and challenges around metrics are not acknowledged as a risk. Whether that is on the Commission's own performance or the strategy or ABSG recommendations, there is a huge reputational risk in not getting agreement. For the National Strategy in particular it feels like a very big risk that we don't have uniformity and clarity across projects. For me there are issues around no mention of NICE, no real mention of an NHS led treatment strategy. It feels to me that the Commission has a central role in driving this forward and providing leadership. A frequent criticism of the strategy itself is that we still don't know how to measure success either on prevention or treatment and support.

■ felt that there still was not enough on suicide prevention, coroner records, work with the banks, staff awareness and the APMS survey and getting gambling back into that survey.

■ – On APMS, it has been delayed by COVID19 and department is consulting on scope. Further update awaited in December and have reiterated previous message that gambling should be included. Due for 2021 and likely to be 2022. Disappointed that published response on consultation did not include gambling. Hopeful but not putting all eggs in one basket.

Engagement in Wales and Scotland to look at equivalent data.

Did not include the detail in the Board paper as we didn't want to focus the time at Board on progress of NICE or APMS but wanted them to consider the whole strategic direction of travel. It's about the timing of the individual spokes.

Suicide prevention – group could benefit from a conversation about the work in Scotland and Wales and developing work in England. That has fed into building in to COVID19 response but does not address the fundamental issue of the coronial system.

██████ – there is movement and consensus in Wales to move forward. People have brought forward projects in play and begun looking at how those fit together. The Welsh Government and the Police have initiative around adverse child events and are trying to embed all activities within that framework.

██████ – Wales jumped ahead by having a specific session on suicide prevention. Some of the session was about pushing back, have had good engagement since the meeting and the Welsh and Scottish suicide prevention leads have linked up.

██████ – if we have a good story to tell about this which provides a model it would be good to shout about.

██████ – Key contributions section – my question is there are a number of contributors, who coordinates all of those and in the risks table, that is a risk that so many different partners are playing pivotal roles and the risk is around delivery. Fundamental issue is around the RET system getting the Governance right and ensuring it is robust.

██████ – what has changed – in discussions internally has been a change in tone – in the first year of the strategy the Commission has to take care to not take ownership. There is now a realisation that we do have to be the driving force beyond the strategy and that gives us the remit to deliver and to do things like our RET timetable on Treatment. Some of the interim actions are really good stepping stones. Ultimately government needs to take forward through the addiction strategy a stance and a pathway for gambling addiction.

██████ – my concern is that someone labels themselves as a National Treatment Service it means it takes away the pressure on Government

██████ – that worries me and it's driven by money. If Chadlington money had not been redirected, if the Commission hadn't directed funds – GambleAware have shedloads of money and have made a public commitment to pulling out of research and just being about treatment. Has to be a pivotal role for the Commission if only to land responsibility where it should be with the NHS. This is risky for people on the receiving end of treatment. Don't know how we take that concern forward or emphasise in mapping.

██████ – What leapt out to me from the risks was the assertion that the voluntary sector has more capacity at the moment. I think it would be difficult to get any traction with Public Health for the next year. Is that risk fairly articulated?

██████ – May be more that voluntary sector has more opportunity to work on projects and take funding. Some of the teams we worked with in Public Health no longer exist. Some charities have real interest right now in tackling a crisis and are happy to take money to build gambling into their work e.g. Step Change.

██████ – my concern is the voluntary sector doesn't have the strategic levers that we would have hoped for through Public Health engagement. Voluntary Sector will not deliver geographical coverage in the same way.

██████ – caveat is that there is a very strong and expert team at Public Health England who are doing more work now which is COVID19 related. Once that review is published it will provide some impetus in the regions with the public health directors. From the centre, until we get changes through Parliament we still have PHE and the evidence review to be published. The worrying thing is

the strategic – the voluntary sector will take money if it is available – but not at the expense of creating something ad hoc and piecemeal at the expense of clarity and government.

■■■■ – one example in the Scotland project and the whole systems approach pilot in Glasgow. It has struggled because of COVID19 and what they have identified is working through charities through a connected governance structure. Pivot away from Local Authority teams to starting with community based projects. If they do that still get the progress but still have the overall strategic role.

■■■■ – intuition is that risky to have everything invested in the NHS when given the current crisis there will be a backlog and public opinion will not be in favour of problem gambling clinic. Although as others have remarked we think that charities will take the money we should not neglect the private sector in terms of delivery. Too risky to have everything committed to an organisation where decisions will be political.

■■■■ – my sense there is a political will and there is an appetite to integrate because clinicians are recognising issues coming through. Ground view is that NHS would welcome a national strategy.

■■■■ – empire expansion. When it comes down to it the public want to make sure that other services aren't impacted. I'm very worried about league table and capacity for reputational agreement to ABSG and Commission.

■■■■ – we have included them in our advice.

Group 1 Feedback

■■■■ – general consensus on same format as last year, on key themes of delivery, prevention and treatment. Agreed worth thinking through impact and audiences for the report. Present in an accessible and digestible. Relevance to Scotland, Wales and England whilst not separating out too much. Split between actions for the Commission and actions for others and noting last progress report says very little about regulatory changes. Spending more time on the strategy over the next few meetings and tie into emerging advice on the gambling review. Flexibility over the timetable. Assumption was end of the financial year for publication.

Question on education and preventative messaging – how do we want to comment on things like Bet Regret.

Group 2 Feedback

■■■■ – discussed 5 key risks and group identified importance of considering risk of success measures. Lack of mentions of individual projects especially suicide prevention, treatment and support. Risks of national treatment service describing itself as such and taking pressure off the NHS. Role of the voluntary sector versus Public Health and risk of public health being diverted. Risks lack of coherency. Measures to co-ordinate voluntary projects and noted public health work still ongoing. League tables.

■■■■ – anything else for us to be working on now? That a clear steer on the progress report for now. ■■■■ wants to talk about league tables.

■■■■ – I am thinking more about what they look like in the end. I am very concerned that there not a grasp of the appropriate methodology or the risks of harm resulting through the incentive mechanisms being wrong. I'd be very worried if we said in principle that we liked them and they were adopted by the Commission without us saying what concerned us.

█ – have been ongoing conversations, looking at the Commission maybe funding some independent research to look at effectiveness, empirical testing with consumers and some testing with operators. Evidence based approach and testing of constructs is being considered. Enough willingness to explore further. Happy to discuss further.

█ – relieved to hear no rush to action, are lessons from other fields and a lot of dangers here.

█ – █ has noted that if league tables are the solution, what's the question? We have asked for further investigation as a mechanism for increasing transparency, driving up standards but unintended consequences are part of that conversation.

AOB

- GC is now using Microsoft teams and question was raised about ABSG using this. Majority views was to stick with Zoom.
- Christmas gathering – Quiz, date to be identified. 5pm start, not Monday or Thursday
- Format for bringing industry updates into the sessions - █ will look at this
- Would be helpful to have a flag for webinars etc like the one for loot boxes – █ will keep in mind with other papers.
- January session – any thoughts for particular focus to go to █ and consider if an extended session would be preferred.
- █ to consider a thematic reflection on Board engagement
- Could a future meeting cover the GREO process with systematic review and process of commissioning.
- Build in time for individual updates from Board members – █ happy to talk on process with GREO but would like to understand wider process with the Commission. Could include that in the papers – paragraph to cover updates to go out in the papers.

ABSG 21.01.21

Attendees: Louise Baxter, Shane Carmichael, Cath Cooney, David Forrest, Ian Gilmore, Hermine Graham, Rachel Lampard, Anna van der Gaag (Chair), Jane West

National Strategy to Reduce Gambling Harms – Year 2 Progress Report

Two workshops had been held to review progress reports on Treatment and Prevention. The Board were asked to consider the following questions:

- Are there any other areas of progress or activity which we should highlight in the progress report? This includes areas beyond the Year 1 ABSG recommendations
- Are there any other areas where we would have hoped to see progress but where there is no evidence in the action map?

Treatment Workshop

██████████ recapped the workshop held on Treatment and the approach used to review the recommendations, assess the available evidence and set out how much progress had been made. The overarching vision is a joined-up treatment system which is centrally co-ordinated, consistent, accessible and effective.

For each recommendation, the group considered what ABSG were aiming for, what would be the minimum standard, and what needed to stop. The workshop notes were shared with the Board for review and comment.

- There is a sense of backward progress on the CQC – need more information but seems that not much progress has been made this year, and potentially some partners have backed away from signing up to independent quality assurance in favour of in-house processes
- Remains a question as to whether legislation is in place to ensure that all treatment providers are required to have independent assessment?
- ██████████ noted that without legislation it would be hard to get traction with both the CQC and providers – that would be a focus for the upcoming review. Continued concern about the relationships between 3rd sector providers and NHS clinics, some of which has been made public. In the absence of a treatment strategy, most people with issues will come under 3rd sector provision.
- ██████████ raised financial pathways and noted it was useful to highlight that concern – Leeds clinic not seeing a flow of clients is concerning
- ██████████ noted that SLAs need to be looked at in respect of NHS clinics and maintaining access to multidisciplinary services for cases meeting a certain threshold
- ██████████ asked about the flow of individuals being referred to the Leeds clinic, and what determines the optimal flow of the 3rd sector to the NHS clinic? ██████████ advised that he believed it should be a PGSI threshold. However, the criteria are not as well defined, and it won't be working as well as it should.
- ██████████ noted that on this the group were relying quite a lot on off the record conversations between ██████████ and the Leeds clinic. ██████████ advised that it was her understanding that the more severe issues, co-morbidities and other factors would go to NHS clinics but need to ensure that is covered in contractual arrangements. ██████████ noted that there must also be the question of what the gambler wants – some might be resistant to a very formal setting versus a helping hand. Would need to look closely at cases.

- [REDACTED] asked if there was an audit or evaluation of people going through the pathway. [REDACTED] advised the review does not provide enough evidence about people coming in, throughout or outcomes. We said that clarification was needed at recommendation 5 on a minimum data set or treatment outcomes as there was no evidence of these.
- [REDACTED] advised the Board that a meeting had been scheduled with [REDACTED] which will be a chance to understand the issues he is flagging. The GambleAware data set has a lot of gaps and does not have enough to use as evidence. The Board might consider inviting [REDACTED] from GambleAware to give an overview of that data from his perspective as they are responsible for commissioning and collecting data – that would allow us to be more specific about where the gaps are.
- [REDACTED] suggested that this is really about 3rd sector insecurities around the future of treatment and a starting position of is there enough to go around. What opportunities does the review present to ask for this issue to be resolved?
- [REDACTED] noted that on recommendation 4, there were some promising pilot initiatives to expand treatment into high-risk environments.
- The Scotland group are meeting on Monday – [REDACTED] hoping to get a sense there as to what government are saying about treatment.
- Recent helpful evidence includes to NIHR review published in the Lancet.

Prevention Workshop

The workshop notes were shared, and the Board were asked to review and make comments. [REDACTED] advised that a similar process to the Treatment workshop had been followed to review the recommendations.

[REDACTED] summarised some additional information that she had provided following the workshop.

- Credit Card Ban – consider an impact assessment to measure both unintended consequences and the impact on gambling harms.
- Consider banking sector work about identifying consumers and patterns of play, financial harm and debt. The same teams are dealing with vulnerability and gambling. Options to block people.
- Enforcement work and the review of the Gambling Act. Will gambling be pushed underground? What are the Commission doing around law enforcement, strategy and disruption as prevention from harm?
- Loot boxes

[REDACTED] reminded the Board that on enforcement ABSG needs to be careful about not going into an area not directly related to the strategy – we need to stick to the prevention and support. There is a lot of work going in the finance and banking sector, for example the [REDACTED] work with Lloyds Bank.

[REDACTED] noted that an effective enforcement and disruption strategy contributes massively to the prevention of gambling harm. [REDACTED] suggested that this issue may sit better in metrics that the Commission uses to measure impact.

[REDACTED] flagged that part of the Gambling Act review is looking at the powers and resources that the Commission has, so if we identify that extra powers are needed to disrupt and enforce, we could reflect that. The Commission has pushed back to the industry about claims on the black market, but it is an argument from the industry to prevent tighter regulation.

█ noted that this also brings back to the loot box conversation as they are not gambling at the moment. All the platforms that harm children, there are issues which mimic gambling.

- On metrics, █ commented on the public health evidence review. A key suggestion was the public health outcomes framework would help to provide local level data for local authorities who will likely be responsible for the wider impacts of gambling harm. To get gambling on the PHOF it would have to become part of the ONS surveys, likely the labour force survey.
- █ added that she was really concerned about the Commission's consultation on the data collection. If they don't opt into these, we miss a trick in that data will not be visible at a local level.
- █ noted that this has wider consequences on other things. The Centre for Governance and Scrutiny work – delivering that would be really difficult without local data. It needs to be collected at the beginning to allow delivery based on that information.
- █ suggested that ABSG reiterates the importance of this moving forward and ask the Commission what they are doing to move forward. █ advised recently that the Commission will be joining the working group on the Adult Morbidity survey – the process of how that happened was unclear. Not easy to follow the line between recommendation and action as we don't know who the decision makers are.
- █ advised that it is about relationship building and people recognising gambling harm as being within the wider determinants of harm. Need people who are able to unleash existing resources. The key in a lot of this is the implementation groups in the nations. How do we observe where we see things going well and share that? One action is finding out more about what is going on Wales.
- █ seconded from an alcohol perspective, Scotland are doing well in being able to do this, in England is a maze to navigate. It's knowing who the decision makers are, who is supporting them and building up long term relationships.
- █ agreed and noted there is something about power and influence. It is what it triggers to get issues on people's agenda. In the action mapping, DHSC aren't listed as a stakeholder and need to be added.
- █ updated on Wales - the implementation group is planning to meet to February. █ last year issued a statement regarding the Chadlington funds to set up treatment services. █ is a public health academic.
- █ referred to Progress Report 1, need to reiterate the point about what outcomes are being generated, not just about activity. There is a doughnut model approach that could be taken.
- Young people and education and keen to see evaluation in year 3.
- Governance and Delivery – overlap between the two areas, need to think about how to continue to develop the report. The Lived experience work needs to be interwoven across the Treatment and Prevention strands. How will LE affect change at the implementation and national level?
- █ noted that hopes of funding through Chadlington – there does not seem to have been much action – it may be a big disruptor to the strategy. █ advised that his understanding was that the charity idea was taken out and the monies given to GambleAware. Understanding from GambleAware was the monies were to be used to fund research on regulatory issues. The report must say something factual and brief about that. None of the funds have been forthcoming as yet, and that has caused a lot of concern.

- [REDACTED] in the action map, there was an item on engaging on the MRC on public health proposals and identifying research funding. [REDACTED] **will follow up on this and update the Board.**

Where are the gaps now?

Overall, the Board felt they had a lot of clarity about what they want to say on recommendations but if there are any gaps those would be good to collate now.

- [REDACTED] spoken about the Patterns of Play research, to update the Board that the interim report will reveal a lot of facts about online gambling that no one outside the industry will have known before. There are more than 1 billion data points, and the research team were given 7 to 8 weeks to review them. As a narrative report could not be produced in that time, we have suggested a slide pack. Gamble Aware would like 20 slides, we have 120 to 200 slides. Target date is to publish on March 10 – we are anxious for as many facts to be put into the public domain as possible before the close of the review consultation. Gamble Aware say they would need several weeks to review the size of slide pack we have proposed. The steering committee is happening today, and he would think that the Commission would be very keen to see the outputs. It will reveal how dependent the industry is on certain types of players, what products make money, the times and spends and session issues. Phase 2 of the work is in NatCen's hands – 4 operators have agreed that their customers can be contacted for follow up as there are no direct indicators in the data set of gambling harm. That will run for a year from the interim report. We stand to know a lot more about online gambling for the progress report.
- [REDACTED] noted that this was a critical report, and so it is disappointing that GambleAware cannot see from a strategic perspective how important this is to the call for evidence. Can the Board something about this work and need to think about framing?
- [REDACTED] noted his hope that they will publish on March 10, and that he hopes to be able to write into the Progress report that the data is available.
- [REDACTED] asked if the report needs a note about barriers to progress regarding research commissioned by Gamble Aware where we get partial results or none at all. Placing money for research into the hands of research councils leads to better governance and clearer outcomes.
- [REDACTED] noted that some projects that GambleAware do would be the sort of things that research councils are used to dealing with, but in this case, we are setting down the facts. It's a data reporting exercise and it couldn't be any more in the time frame. Difficult to know how when something is needed like this, who should be paying or commissioning this? The research councils are better suited to longer timeframes and more traditional academic framework.
- [REDACTED] asked if the idea of the data set being warehoused and accessible to researchers still live?
- [REDACTED] responded that another group was commissioned to look at that and I don't know what progress they are making. The prospect of this becoming an easy resource for researchers is bleak due to the complexity of the data. There would have to be a service where researchers would have to have someone to ask because the variables and meanings are so complex. It would be desirable but would need significant commissioning to organise and manage the data. There is a careers worth of data available.

- ██████ noted that the data repository proposal went very quiet. A group looked and reported back saying it would cost £6m. We need to have a story on this issue. Patterns of Play could be an example which raises much broader governance issues that we have been signposting for a while.
- ██████ suggested a point to be included future progress reporting and data. Imperfect solution to work out if strategy is working based on patchy data and anecdote. Lay the foundations in this report for an exit strategy for progress reporting following on from the end of this strategy. The successor should not rely on yourselves to report on it each year.
- ██████ noted that if the Commission had outcome metrics for everything then they would be collecting the details anyway so that each Board could review those. That is what is lacking.
- ██████ noted that she would update on the conversation with the Commission Board and thought the penny has dropped on the need for better metrics. I'd be comfortable with being honest about the fact that we have imperfect data and sources on which to base our conclusions we have done it so far, but the methodology has its limitations. Now is a good time to signal that in Year 2.
- ██████ noted that in the absence of data it's hard to know what you are governing for. Its fundamental to where we want to go, how we know we are getting there. The good thing is us starting to focus in on the red lines in the context of the review, rather double down on what we have already.
- ██████ asked about the next iteration of the strategy, what will our role be? At what point will that happen? ██████ **to check and update the Board**
- ██████ noted that on the year 1 report, in the annexes we have an impact and outcomes measurement framework. How should we provide a commentary on this? There has been some progress on acknowledging that these are shared goals but zero progress on setting a baseline or agreeing a KPI. We have been specific about what we think needs to happen on metrics. May be a story to tell on league tables.
- ██████ asked what is the blockage?
- ██████ responded that it is partly the Commission desire to unpack and be clear about what metrics are within its own remit and what is not. That is sensible but while I agree with the approach, the Commission shouldn't underestimate responsibility and influence over other agencies.
- ██████ suggested that strategically it is time for the Commission to start making a noise, and in the absence of legislation and more willing wider system. Part of the review is the role of the Gambling Commission and we need to say that we want to engage more widely.
- ██████ noted that in December in Scotland I presented on this subject and I used some of the information and priorities that we set around metrics. Us saying this at least opens a conversation – there will be nuance locally. We were quite brave to nail our colours to the mast on this. Suggest that we stick with this.

Horizon Scanning

- No further updates but ██████ noted the achievements of ABSG in 2020.

Update from the Commission Board Meeting

██████ attended the first part of the Commission Board meeting and provided a brief update for the Board. It was a very positive meeting, in particular the work on metrics and online harms, and work which is now been developed on publishing operator data. ██████ was present for the following agenda items:

- Online Protections
- Game Design
- Metrics
- Publishing Operator Data
- Input to the Corporate Strategy

Overwhelming sense from Commissioners was supporting what ABSG are saying, need for much greater clarity on metrics, helpful discussions on the difference between outputs and outcomes. The Commission Board really got the point about transparency as good for the reputation of the Commission and in terms of operators, by asking more of them that would allow comparisons to be made would have an impact on reputation which mattered to investors and shareholders.

What are the critical metrics that there needs to be a proper resourcing and a proper commitment to establishing so that there is something to measure against?

Feedback was that got the balance right on what the Board needed to know, and the level of contribution expected. Sense that the Commission needs to be bolder, clearer and to ask more of the industry. There was a discussion about the extent to which Boards and shareholders are interested in safer gambling. The debate was whether that was an argument – if consumers are not very interested in what companies are doing about safer gambling, does it really matter. Companies care about their reputation – ultimately what they do and how much attention they pay to those who may be at risk does matter to consumers.

█ noted that you don't hear a lot about companies doing much to protect people – is it because if they say that they are admitting to saying it's something bad.

█ suggested that an analogous example is Salesforce CEO said Facebook is the new smoking and we as digital companies can no longer get away with treating consumers and companies as if it is all about profit.

█ drew attention to the report this morning which illustrate how difficult it is together consumers engaged in responsible gambling.

█ noted that the Skybet model is very interesting, large volume of smaller bets

█ noted his regret that the Patterns of Play work cannot look at individual operators

Email from Regulus re: black market. Concerned that the Commission is blatantly denying the problem. My judgement is that there was a real danger. In other jurisdictions even those who have very aggressive financial blocking and website disruption they have been unable to block citizens accessing unlicensed websites. Starting to see evidence from the Nordic countries – if you put restrictions on you will not lose most customers but the ones who leave will tend to be the heavy customers.

█ noted that the Commission Board considered a paper on the game design consultation and everything except multiple slots was agreed. That is a piece of work ABSG did and will ensure that you have the full list.

Online Protections

Advice, priorities and risk and how we frame our advice. The key points noted were:

- Player journey a useful concept
- Concern about the phrasing of paragraph 8 and the use of the word 'enjoy' – should the Commission use this language as a regulator. Board noted that enjoyment should

not be the responsibility of the regulator, and suggested consumer satisfaction; conversely it was noted that regulation could reduce satisfaction.

- Phrase 'high value customers' also has a positive spin to it
- ABSG concerned that public health perspectives are being missed out.
- High level objectives at Annex B need more detail
- In play betting and whether the online discussion is a place to talk about whether we need to revisit that type of gambling.
- In discussing the overall reduction in gambling related harm, how will this be measured?
- Was there any discussion on the functions or powers that the Commission is seeking to acquire through the review?
- On paragraph 12, the factors they have to be organised and delineated into what types of factor.
- On limits, need to consider options for different types of volume measurement

█ asked how does legislation need to change to better protect and what resources does the commission need? Universal agreement is that £19m is not enough. Huge stretch across the Commission at the moment. There is immediate resourcing and then looking long term at what the Commission is not able to do which it should be doing and what changes are needed to facilitate that? The Commission Board did not get into that – the discussion on this paper was about the approach to customer journey, more detail on the measurements.

█ suggested that what is missing in the player journey is highlighting where people can access help or support as needed. We have had a presentation about in game messaging and tool. Within the players experience there should be scope for advice and information.

█ noted that from the PowerPoint some of the work we are asking the gambling companies to do are asking them to comply with codes of practice on advertising and age verification – that is existing legislation. We could push it more than asking them to do things that they should be doing anyway.

█ noted that there is one specific policy lever mentioned which is stake limits. Without going into detail, he would recommend broadening 'stake' as would need to cover 'spend' and 'deposit' – there would be a great difference in the ranking of players. Different jurisdictions have been introducing limits on the consumer, and if you want to limit the volume of activity you can specific it in a number of ways. The most obvious is how much can you deposit into your account, or the amount lost in a given period. Paras 11 and 12 mention a limit on what stake you can place. Some people place very high stakes but lose very little. In the extremely high stakes players can break even. There is a great deal of consumer choice in the odds at which people can bet – there a big difference between 2/1 on and an outsider, so specifying a limit in terms of the amount of the wager might be very divorced form the number of people who make big losses. In his view the Commission should not be committing to one of those metrics at this stage, but rather talking about some sort of volume measure.

█ noted that stake limits relate to affordability

█ responded that affordability is most obviously about spend. On that route, if you say I can't afford to do something you mean I can't afford to spend x pounds – going to stakes seems to be getting away from the point.

█ noted what people can afford to lose is really variable. On para 8 I am a bit unclear about some of the language used – is there value in being more explicit about what that is. Some people don't realise themselves what that means. How would you decide what on distribution for leisure gamblers?

█ noted that the use of language is really loaded e.g., for those who are not at risk of harm – by whose definition and at what point in time? 12.1 and 12.2 are possible keys to unlock this – what does the evidence base say? Point 13 – what anecdotal evidence looks like?

█ noted the factors referencing financial, debt, relationship, health, employment – how does that help to know that? It's too broad and it's not enough to be able to delineate the harms.

█ suggested the objectives lack an understanding that this is a human system. The causality and complexity of behaviours – there is scope to be more ambitious in the objectives.

█ suggested that issues need to be viewed in the context of a dynamic system of vulnerability, risk, harm and environmental factors

█ agreed that the paper was too narrow on public health dimension but reminded Board of the wider context that other workstreams are covering areas like advertising. Surprised how early days the paper is – does not give much sense where the Commission is on many of these issues. In terms of lack of ambition, my impression is that the Commission is prepared to be ambitious, better read as a very early stage in the thinking process. Hoped for more substance. Don't think we should jump to the conclusion on this.

█ noted that on measures, have to think about how easy or difficult it would be to implement those measures.

█ advised that there was a commitment to look at different types of factors by the end of March. The debt one is a key, there are also factors like time spent – how much should the emphasis be on the financial and the time loss?

█ asked if the Board were being asked to comment on this paper? I'm not sure of the process for that. We have already said quite a lot about online harms in our advice. How will we mesh this together?

█ responded that at the moment ABSG are feeding into the development of the Commission advice. The simplest thing is that we can share out notes and share a bullet point summary to highlight the key points.

The ongoing process will be to capture ABSG views, █ will continue to have regular catch ups with █ and can set up for those with █ as well. At the end of this, can publish a written record of the ABSG advice. █ noted that █ will be splitting the project management on this with █ going forward and we don't know yet how that will fit in with her wider role. The Commission works to different timescales – we don't respond to the call for evidence so our advice will be later.

█ suggested that the paper could have had a short paragraph as a preamble reminding the reader that online gambling has come to dominate land-based gambling. It accounts for 60% of gambling now and it will increase in line with other industries. Secondly, going online has greatly increased our chances of addressing Gambling related harm because we can observe what players are doing and the Commission should be seeking to use this facility –

the Single Customer View is at the heart of exploiting the possibilities that online opens up compared with land-based gambling.

█ noted that there were multiple ways in which the ease of gambling has increased, the knock-on effects of adverts, marketing, social media, free bets, low visibility of warnings and limited evidence of operator interventions with problem gamblers.

█ noted that population level data would be really helpful and would help to estimate how accurate prevalence level statistics.

█ suggested that it could obviously be done to say where accounts were held. However, he would say that if you look at local areas then controlling for the people who live in those areas it's unlikely that there is any systematic difference. In Patterns of Play we allowed conversion of all postcodes to IMD decile so will present information on that basis.

█ noted you can have equally deprived areas that have very different outcomes. If it isn't a hard thing to do then it would be interesting.

█ responded that it's not very useful to just know who has accounts – it is how the accounts are conducted that matters. A very high proportion of accounts are used minimally. It would be very weakly related to anything that you could usefully act on. On Patterns of Play the team are preparing an accompanying data file to go with the slides – we will pick out the areas we think are of interest and the data files will empower other researchers to pick out different areas. The main limitation of patterns of play is that it is account data rather than individual data. We are not able to observe what people are doing online with their other accounts.

█ noted that all this makes the case even more compelling for the single customer view work.

█ noted that the principle of socialising papers early is great. This is as much about thinking about the strategic context as the issue we want to regulate on. Would be interested to see the views from DAP.

█ noted that in her view the big prize is the single customer view, and asked to what extent is the Gambling Act review as vehicle for pushing for that? If that's not built into legislation will it happen?

█ asked if it is specifically a review of legislation or a review of gambling?

█ advised that it is about legislation, but the boundaries are blurred. There is an opportunity around online only if they ran with and delivered effectively – how can that hook be used to make the ground better for delivering single customer view.

█ noted that Licence conditions should be adequate. Want to improve gambling policy – SCV could be imposed through licence conditions couldn't it?

█ advised that he didn't know. There is a combination of issues about customers owning their own data. The framing of how intrusive regulation should be – it feels that there is a societal debate around that. There are some points about where it sits in society.

█ there have been questions about whether the Commission had adequate resources.

█ advised that the Government decides on the level of fees which the Commission can charge.

■■■■ noted that open banking is it a parallel. Project called EQ connect developing a SCV product. We need to have a little bit more facts and evidence.

■■■■ noted that on open banking , the banks have the frontline on gathering information on how we spend. Just because people have more money, it doesn't not cause them harm to lose it.

■■■■ will be in touch with the Chair of LEAP. ■■■■ confirmed that the group will appoint their own Chair before the March meeting.

Loot boxes

■■■■ updated the Group and thanked them for the comments. ■■■■ will produce a next draft to be agreed and passed to ■■■■ as an input to the work ongoing with DCMS.

■■■■ asked if there had been any feedback on the consumer protection legislation. ■■■■ **will check and feedback.** Loot boxes issues coming in from a number of different areas for ■■■■ – can get advice from others if needed.

Minutes

The minutes of the previous meeting were agreed.

ABSG 18.03.21

Attendees: Louise Baxter, Shane Carmichael, Cath Cooney, David Forrest, Ian Gilmore, Hermine Graham, Rachel Lampard, Anna van der Gaag (Chair), Jane West, [REDACTED]

Declarations of Interest

[REDACTED] advised that the Patterns of Play project is funded by GambleAware

Introductions, update from Board Members (including update on Patterns of Play research) & horizon scanning.

The Board noted the departure of Neil McArthur. There will be new leadership with a new CEO, and a new Chair to be appointed. [REDACTED] has drafted a letter of thanks from ABSG to Neil.

Regarding the implications for ABSG, [REDACTED] confirmed that she would continue to have conversations with [REDACTED] but the Board and Commissioners want to involve ABSG. ABSG has a good relationship with the current Chair and Commissioners but right to raise concerns as things could change in the next 18 months. No imminent sense of change but must keep communications open.

Patterns of Play Project

[REDACTED] provided an update on the project and noted that a slide deck will be circulated after the meeting.

[REDACTED] and [REDACTED] have produced a slide-based report of 220 slides. [REDACTED] update today has been condensed into 20 slides. The work involved 7 operators providing 20000 players accounts each, covering one year from mid-2018. The researchers randomly selected accounts, with overweighting of more frequent customers to build a more reliable sample.

All numbers relate to the estimate of the 10 million. Those are different to those of the sample due to overweighting. Of the 7 operators, 5 are principally betting, 2 more focused on casinos and slots but all offer the full range of online gambling. The data covers:

- Age, gender, decile of IMD for each player (based on postcode)
- Betting activity – very detailed granular information
- Gaming data – more difficult and can take place very fast (50 spins per minute is possible) so what was specified was that the whole 12 months was divided into 15-minute window, and information is aggregated for that period.
- Separate data files on safer gambling interventions and use of self-management tools.
- Additional data files resulting in more than 1 billion data points.

Data covered the market for betting – 85% of the GGY from betting according to regulatory returns. Confident that this is an accurate representation.

Gaming market more fragmented – 37% of the gaming market with mix of types similar to those in regulatory returns.

Less confident on the interaction between betting and gaming activity as too much betting relative to gaming.

Gaming is significantly more profitable – betting only £135 profit, gaming only twice as much (£296). Account which does both £602.

Do not know customers problem gambling status or about gambling harm.

Can talk about correlator risks such as high levels of spending. Many more alarm bells from gaming than from betting – higher levels of spending, greater proportions of people losing over the year, greater concentration in poorer neighbourhoods. Consistent with other research.

Betting – football and horse racing were dominant. Most football bettors had wagered in play as well as pre match. Most betting accounts bet on both football and racing. The older the bettor the higher share of horse racing. In senior age groups, sports almost disappeared.

In gaming, the time allocation of the customers to different gaming products. Slots is the biggest consumer of time; bingo has a high proportion of hours. Slots is the dominant product, bingo tends to be low spend, long time, casino play is intense spending.

78% of accounts male, 94% of all bet spending was by men. High frequency of male betting. Extreme spenders are much more present in the male sample.

Gaming – men are dominant in poker and casino play. Women get reasonably close on slots and are most bingo customers. Across all gaming activities, female players were more engaged than male customers (played more often and for longer in each session). On median females more profitable in gaming but on mean males are as more extreme spend in men. The extreme spenders are mostly male.

As regards age, there was a dominance in the 25 to 34 age group across all products in (17% of population but 34% of all accounts). Younger customers are overrepresented but spend at modest levels (under 25s are much less important to the online operators than you might think). Steady increase in spending levels through the age groups.

For male bettors, the older you are, the less you lose as a proportion of your stake. In football, young people tend to bet at very long odds, which tends to indicate they are fond of combination bets. In a deprived area the typical bet was £5 with typical odds of 17/1.

Betting tends to draw across the IMD areas. Virtual betting is very concentrated in deprived neighbourhoods.

Gaming has a very different profile – very strong contrast in areas of deprivation.

Dependence on heavy players. Customers are organised by how much they stake – gives an illustration of the dependence on heavy customers on horse racing. The top 1% are staking more than £20k and providing 52% of operator win.

High dependence of operators on a small number of customers.

50% of customers who bet the least are almost contributing nothing to the operators.

In gambling 10% of customers are giving 85% of revenue.

Levels of Spending

- Betting – 84.5% spent less than £200 a year, with a minority of heavy losers.
- Gaming – similar profile to betting, but a higher proportion of people lose a lot and a higher proportion come from deprived neighbourhoods.

- Heavy loss sessions were remarkably common – 2.3 million sessions where the customer lost £200. 4% of accounts where the customer lost £500.
- Total gambling for the year – low prevalence of extreme time allocation to gaming. High time and high money went together.
- Late night play more reckless in gaming but not in betting. On average all night sessions resulted in the customer winning.
- Speed of play in slots – reason to limit speed of play.
- Credit Cards

Use of self-management tools.

- Reality checks – use growing but not much engagement.
- Deposit limits – the most used of the self-management tools, used by 21% of customers. More than one third set a limit higher than £50k per month. Users may consider that setting a limit is compulsory so are adding a nominal amount.
- Safer Gambling Interventions – seemed to be well targeted for those who received an intervention (tended to be high spending gaming customers) and seem to have been followed by moderation of behaviour. Only a small proportion of customers were contacted, especially with telephone calls. Suspect the issue is with the thresholds set for interventions.

Questions

Asked how ABSG should respond to this data, █████ advised that one thing is that political and media debate has really focused on online betting, and politicians seldom get the message that problem gambling is much higher in online slots and casinos. All that we have found at the individual level confirms that controls on slots and casino play are a higher priority. Customer base for gaming is markedly skewed towards deprived areas, and the propensity to enter the realms of extreme spenders is greater.

█████ noted from the LEAP meeting, there was a similar debate on football betting and Marketing and Advertising, with one member flagging that the marketing that they are now getting on Cheltenham etc. for bonus offers now include 30 free spins – does reflect the crossover and the hook used by operators.

█████ advised that the profit is coming from gaming and dual customers are much more profitable. Politicians readily swallow the line from horse racing that it is very safe compared to other forms of gambling. We find it is equally likely as football to spawn high levels of spend.

█████ asked about is your view as to how many accounts an individual might use? Could under 25s use more accounts, and around safer gambling interventions do people switch to another account? Interested in the odds at which bettors choose to wager – high odds. Linked to deprivation, key that we call for local information.

█████ asked if during the 15-minute window, was there movement between betting and gaming?

█████ explained that the question wasn't looked at as they analysed the two data sets separately. Broadly the brief was not to explore trajectories of gambling – that would take much longer and be more complex. The timeline was 7 weeks from data to report, so mainly concerned about the overall picture and were not asked to look at micro questions but would be something further to look at in the data.

■■■ asked if the work was able to aggregate multiple accounts?

■■■ replied that he didn't know. When this report talks about players, we really mean accounts. On the Commission website, a survey of online gamblers in 2018 one of the questions was about how many accounts people used in the last year and the average was 1.9 and the under 25s had the lowest number of accounts. The middle aged had more accounts.

■■■ noted that the ARA study on self-excluded gamblers found the mean number of accounts was four.

■■■ responded that he would expect self-excluded to have a high number of accounts compared to the wider population and would try to evade Social Responsibility measures. Our estimates of people with high losses will miss those whose losses are spread across multiple accounts. The Daily Mail have yet to use the story on the work but has spoken to ■■■.

■■■ asked about the industry response.

■■■ replied that he did not know, the work has been carried in the trade press but only one of them interviewed me. Quite sober and factual accounts taken from the press release. Operators are brave to put themselves forward – there is lots of evidence of people behaving moderately and those who are not and have severe problems, then media will always cherry pick the most damning parts of the report. Some credit should be given for agreeing to supply data and no credit should be given to Camelot which initially agreed and then withdrew.

Minutes and matters arising from January 2021

Agreed

National Strategy to Reduce Gambling Harms – Year 2 Progress Report

Careful thinking needed about how to frame the report:

- Review each section in turn and input on metrics and measurement.
- What do we want to say as a Board in the Executive Summary?

Section 2 - Prevention and Education

- ■■■ noted that the Industry Challenges do not mention Single Customer View and it needs to be included
- On affordability checks, ■■■ advised that a Board paper is being considered in March 2021, but he did not know at what level a hard check limit is likely to be set or what technological solutions might be set out.
- ■■■ noted that the year 1 progress report identified affordability as a high priority so that does need to be covered in this report. ■■■ recalled that there had been a line saying that if we want to take the opportunities that online presents, SCV is key to making that happen. ABSG agreed that this statement needed to be included in the report.
- ■■■ will attend Board on 25 March so can update after the meeting to see if that has any bearing on what is said in the report.
- ■■■ advised that the Commission decision on SCV was to go with the sharing of flags between operators – more low-tech version which does not involve data

pooling. The decision was made to take first steps and get started. BGC are due to deliver their prototype proposal this month.

- █████ noted that taking action is resource driven, and it will be important for the Gambling Act review and fees consultation to make that point.
- █████ noted that affordability is a blunt instrument. The Scottish Chief Medical Officer has mentioned gambling harm in his [annual report](#). To address every issue requires a significant and whole system response. Seeing a bit more joined up response, but we need to see where deprivation and affordability sits within that.
- █████ noted there was reference to Ad Tech, but I notice that in █████ paper there were some deficiencies mentioned around consumer protection messaging and should we make mention of this.
- On Marketing and Advertising this is a key element of prevention and should draw this out further in this section.

Action: Follow up in the session with █████ about the Ad tech challenge to help build that message out.

- █████ noted the need for clear positioning for the Commission in relation to public health. The big prize is strengthening the Commission's ability to act and to convene others – use the Act as a mechanism to do the bigger things.
- █████ advised that work on redress could link into prevention and treatment. █████ has been working with █████ on consumer redress on wrongdoing and affordability – trying to map current work in the financial sector onto this. Could it be self-funding with a code, and could address early onset problem gambling
- On evaluation, █████ asked if the report could develop how that is working with GREO. There has been a withdrawal of the Commission from its influencing role and we need to flag that up, noting the fees pressure context.
- On the question of women – evidence shows the typical gamer being female in terms of engagement, and here is a need to not forget women as a significant proportion of problem gamblers. The adverts and messaging that we have seen have been male focused.
- █████ noted that he was not satisfied with the COVID account and would discuss this point with █████
- On high tech solutions – whose experts are delivering this and to whom? Monitoring behaviour through algorithms is already in use but not in the public domain. We must emphasise that the threshold is set by the operators.
- █████ also noted concern that in the draft text the black-market possibilities are dismissed. Migration to the black market would have implications for problem gambling.

Treatment

- █████ noted the dissonance on the picture in England as to exact numbers accessing treatment and if there are agreed criteria and pathways or not. In this report we need to present the data from wherever we can source it. Until there is a consistent flow we are not going to be delivering to the right people at the right time. We are saying that there are different narratives in this.
- █████ agreed the drafting captured the tenor of discussions on treatment very well.
- █████ advised that ABSG have been very honest about our concerns and must see if there is any progress as a result. There is a lot of conflict, turf wars and politics and we must name those issues.

- █████ welcomed █████ raising the issue that as she has had some experience with GREO, and was concerned about the methods and processes and these to the attention of the Commission. The ease of delivering something the result might not be that good. Would be concerned about GREOs involvement. Had several concerns about the credit card evaluation.
- █████ suggested that in the recommendations should there be some stronger statements about next steps. Would be keen to see something about movement on research councils, and an independent look at who is the best to lead research and to assess.
- █████ noted that ABSG will be hoping that at some early stage the Government will agree to a compulsory levy and that the money will be collected by the Commission. So, we will need a proper mechanism for allocating research funds. There may be a policy change that would force decisions to be taken. It is helpful that the draft includes that some research is very specific and is needed, as well as fundamental development to help us to understand the field.
- █████ flagged that the BGC line on Patterns of Play is that it is 2018 data – therein lies the hook around the need for a data repository and the need for up-to-date data to be available.
- █████ noted research funding requires a solution and asked if ABSG had made suggestions in the levy paper that could be lifted into the progress report?

Metrics and Measurement

█████ advised that ABSG talked in year one about league tables and baseline data. We were involved in some work last summer and █████ helpfully divided the challenges of measurement into three areas – Commission, National Strategy, and operator data. We have something to say about work done, but exactly what operator data we should publish is yet to be agreed. We have some movement on the APMI with the Commission joining the working group, but we do need to flag the lack of progress of recommendations on suicide.

█████ explained that the lack of progress is in part about Commission resource, and there was a lot of support for using the data we have. Also, there is a fear of getting it wrong as we have not yet worked out what transparency should include. I have been asked to meet next week with █████ and █████ to look at metrics – do have a bit of frustration about the slow progress here but this is linked to the fact that the organisation that is well down on productivity due to COVID, has now lost its CEO and will be changing Chair in the next few months.

█████ reflected that it is difficult – there is some value in focusing on areas where it is less about resource, like the Public Health framework where it is more a political issue.

█████ noted that there is a lack of clarity on that. A lot of different messages about how reg settlements will be used, from █████ and from others.

█████ advised that █████ has been leading on metrics and this has moved from working quickly and then people have not been clear on what is being asked for. There is something about leadership and knowing what it is you want.

█████ advised that in speaking to █████ and █████ next week, she wants to propose to move ahead on reg returns data on several areas which could be published by operators (e.g., self-exclusion rates, customer interactions, number of complaints, problem gambling rates, number of customer suspensions). In Year one we asked for GGY, affordability, time

spent gambling and more on warning labels. What I am trying to do is check what data we already have which could be displayed and made public to address the transparency

██████ agreed that it is good to move in this direction, however asking operators to display self-exclusions or interactions may reward operators who do not suspend or interact.

██████ asked if operators would age, sex etc for problem gambling or is it just numbers in each category?

██████ advised that this would only be known at population level. Problem gambling stats are generated by surveys.

██████ noted that he was sceptical over metrics and I recognise that the list of possible metrics is more straightforward. There is a risk of operators gaming the system. E.g., contact can be at various levels. You are also assuming the self-exclusion is a good thing but with better monitoring a system could prevent the loss of control. One operator reporting a higher number than another would not necessarily tell up if one operator has higher standards.

██████ asked if any operators analyse figures and ██████ noted that was a recommendation in the Year one progress report.

██████ suggested that as there is not a sense that the Commission is able to move ahead with that, the recommendation could be repeated.

██████ noted that in the Patterns of Play work, they were not allowed to look at individual operators, only at combined data.

Gambling Review – Marketing and Advertising

ABSG Notes for item 5 – Marketing and advertising.

The group provided some initial thoughts explaining that there are many elements on this complicated topic which interrelate. The discussion today will explore initial thoughts which will help to advise the government on marketing and advertising in terms of Gambling related harms.

██████ gave an overview of the paper, which outlines the five main questions within the Gambling Review that relate to marketing and advertising. The paper outlines the landscape of 'where we are now'.

██████ advised the Board that learning from other sectors including using previous public health initiatives should help provide a good starting point. ██████ also advised that their role is to look at what else could be done regarding legislative change which can be used for discussions for the review.

The group discussed each point in turn.

Safer gambling messaging in adverts.

- ██████ referenced the Heather Wardle paper discussing the deficiencies in messaging on websites. She asked if safer gambling messages posted before the watershed were really safer gambling adverts or are they a way to get brand awareness advertised as logos are used.
- The group also acknowledged that safer gambling messaging is not working and questioned if industry should be leading the messaging on this subject.
- The group used the Smoking ban as reference and thought that we may be missing the public health aspect for reducing gambling harms.

- █████ advised that defining what a safer gambling message is would be useful. If a safer gambling message is tagged onto another advert, is it a safer gambling message or a marketing message.
- The group advised that there is not much evidence but using related subjects will help such as the ban on TFL of junk food adverts. There is not a lot of evidence to say if this has worked, but it was common sense to ban this advertising to help with the issues associated.
- █████ used the example of alcohol advertising where well-known brands will be able to get their brand of alcohol in adverts relating to the 'low alcohol content' version of the drink, which will help brand awareness.
- The group discussed the classic ad campaign 'when the fun stops, stop'. They acknowledged that the industry does not have any reason to promote measures that does not help shareholders. Companies will offer to do what is requested but will drag their feet to do it. The group also discussed the timings of the important messages are so quick, can they be effective. The group agreed that it does not make sense to let industry regulate itself on this.
- The group discussed that Italy have banned gambling advertising, as well as France banning alcohol advertising etc. They advised to look at other jurisdictions where banning similar products have been put into place.
- The group discussed that a set of rules for what can be shown and when, ensuring that it would protect children and vulnerable people. The group were aware of lots of evidence for banning advertising gambling products.
- █████ added that there is a challenge for industry as they will try to do the least amount possible. If we provide clear guidelines such as fonts, timing for messaging etc. to ensure clearer messaging or should all advertising be banned.
- █████ said that a ban like this has not been done since the smoking ban. The government will need to be provided with the evidence and the advice that it will help vulnerable and young people for them to make a decision.
- █████ suggested that the group and GC should point out the successes such as smoking, seat belts etc. The adverts helped the public to understand what was going to happen and helped once the law was changed and came into force.

█████ advised that we need to get political leadership on board including, directors of Public Health, the Chief Medical Officer etc. █████ advised that there has been a recent Scottish report that touches on gambling harms.

The group are aware that lockdown has changed behaviour and online gambling has increased.

█████ said that until there is a sense that this is an issue that required mitigation such as the smoking ban did, there will always be reluctance to act. A longer conversation is required to help change the narrative around the public health agenda and harms.

█████ asked if the strap line was '**don't bet your life on it**' and looked at life as a whole including suicide, quality of life etc, would this a more powerful message than 'when the fun stops, stop'? Links to educational messaging.

█████ thought that this is something we can influence with GambleAware as well as call out more specifically on this.

█████ referenced the work on fat free labels and how messages are phrased and the language used.

Overall thoughts on this section were around:

- Safer messages in adverts
- broad brush of advertisements which utilise branding and brand awareness.

Next steps: What does the picture look like and then build on what is effective and what has been successful in other sectors.

Promotional offers and free bets/bonuses:

████████ spoke about the well know idea 'power of free'. Consumers are persuaded to change behaviour if they receive free stuff. It is a tactic that increases the likelihood to engage in behaviour. She referenced the presentation given to the group earlier in the meeting. They also discussed consumers adding small amounts of money to receive a free bet along with long odds betting. There is a danger to any marketing when we say free.

████████ added that choice of odds is under researched. It is known from past literature that problem gambling is associated with short odds betting not long odds betting. Big spenders do not typically have long odds choices.

████████ added that it is incentivising those with the least which goes back to the 'dream of the big win'. █████████ added that a good example of this is from the lotto game 'set for life' it provides a clear advert that gambling is a way to access a lifestyle for a longer period which is concerning.

- The group reference the work by █████████ which investigates promotions.
- █████████ advised the group on FCA studies on [performance-based regulation](#).
- █████████ informed ABSG that the Commission have done a lot of work around free bets and bonus offers and asked the group what else can/should do.
- █████████ asked if there had been any advice from LEAP on this topic yet.

████████ asked the group if there wasn't a total ban on promotional offers but there was a set of restrictions set out, how would the restrictions be cut? Would we look at product risk, type of promotion. The group agreed that this is a complicated topic to cover, and careful consideration is required to provide a steer for Government.

████████ advised that looking into targeted marketing rather than mass marketing and how these are monitored in terms of triggering any interventions. He wondered if departments within operators are working together so gambling harms and promotions work together and not separately.

████████ advised that consumers often make multiple accounts to get all the promotions on offer. Therefore, is the only solution a total ban.

████████ said that the greatest resistance did not come from the industry with the smoking ban. Broadcasters may be the biggest resistors.

████████ provided some statistics on advertising where pre-covid costs were c£6.6m a week from the industry (excluding social media and marketing). During lockdown this dropped to c£4.3m per week. █████████ also advised looking at the GC's own work from 2020 around the responses from young people regarding brand awareness, advertising and gambling exposure.

████████ spoke about an association between brand awareness and susceptibility. Children and young people of adults who gamble are significantly more susceptible to gambling themselves. She also mentioned the research from Stirling University

█████ mentioned gambling moments in sports outside whistle2whistle. Issues around promotion of in play/mid events bets which appear to appeal to younger gamblers and people with a tendency to harm. Also pop up adds for social gambling within children's games on mobiles to also be considered.

With regard to targeting online - using data/insight that is clearly available as demonstrated in Patterns of Play feels like an example of targeted, evidence-based intervention at one end with the application of the precautionary principle at the other end with the idea of 'confusion audits' and better messaging from GambleAware in the middle

█████ asked when does gambling become a problem? The Government want junk food banned, how is this any different?

Sports sponsorship

The group asked for clarification on whether banning sports sponsorship in its entirety is being considered or just on sports shirts and in sports stadiums.

█████ advised that if ABSG were voting on this, she would opt for a total ban.

The group agreed that it's a difficult area to consider as changing this could be difficult and resistant to change.

█████ said that when you present the spectrum from total ban to restrictions thinking in terms of dilemmas (where we need to think both/and rather than make a simple either/or choice) can be helpful in designing a transformative innovation initiative and for piloting it through the turbulent system transition towards the future.

█████ advised that using the TFL junk food ban could set a good precedent. She advised that the consultation which is out now could be used as a good understanding of the public view which could then be analysed for gambling restrictions/bans.

█████ advised that when the smoking ban came in, many thought sports would collapse due to the drop in advertising revenue, it did not do that. Due to the timings of sports games such as football and the F1, we won't be able to ban children, young people or vulnerable people watching, but we can help protect them by restricting/banning advertisements.

The consensus of ABSG was that there may be ways to restrict advertising and sports sponsorships, but the ultimate goal is a ban. The group agreed that framing the recommendation will be vital and using evidence from other sectors on the best way to protect young people and vulnerable people.

High level messages are:

- Provide more detailed advice at the end of the summer and involve ██████████.
- Ensuring there are no loopholes for advertising, for example overseas advertisements in other languages would also come under any restriction or ban.

AOB

█████ reminded the group that the next meeting in May will be the last meeting for ██████████. She offered them the opportunity at that meeting to provide their thoughts on their tenure with ABSG.

█████ also reminded the group that there is a discussion taking place on 30 April with ██████████.

█████ advised ABSG that interviewing will be taking place next week. She alerted the group that many of the candidates are from other jurisdictions. She flagged this so the group are aware that timings of ABSG may need to be reconsidered to ensure all members could attend. She asked members that if this could be an issue to let her know.

█████ advised that he had read in a trade newspaper an interview with one of the credible bidders for NL4 on why they thought they would do a better job than Camelot. The article discusses being fit for the digital age and how this was central to their bid. █████ flagged that this reinforces what ABSG advised about asking bidders to outline risks in their bids, including product innovation.

ABSG Notes 13.05.21

In attendance: Anna Van der Gaag (Chair), Jane West, Lou Baxter, Hermine Graham, David Forrest, Ian Gilmore, Shane Carmichael, Cath Cooney, Philip Newall, Ulla Romild, [REDACTED] [REDACTED]
[REDACTED] [REDACTED]

AVDG welcomed members to the meeting, and noted the transition with saying goodbye to three colleagues and welcoming two new members.

There were no new declarations of interest.

Introduction for new members

ABSG members introduced themselves and gave a brief outline of their backgrounds.

Updates from Board Members and Horizon Scanning

[REDACTED] had taken part in tendering process for the credit card evaluation. The contract has been awarded. It was a very robust process and it should be announced in the next couple of weeks on the award and timescales. There were five bids and [REDACTED] is confident that the process was well run. [REDACTED] will be on the working group for the evaluation to track progress.

The Board noted that [REDACTED] was involved in the original scoping, so may need to consider replacing [REDACTED] [REDACTED] will follow up with the team leading and will advise.

[REDACTED] – the evaluation could be mapped to the work on redress and measuring impact.

[REDACTED] noted that in the Chair's report [REDACTED] referred to the research (I didn't catch the name) is carrying out, [REDACTED] was interviewed and has found this helpful in opening discussions with the Scottish Government. [REDACTED] is the new head of alcohol and gambling for the Scottish Government and [REDACTED] will meet with him next week.

[REDACTED] advised that [REDACTED] is looking at industry influence on policy making and would be interested in [REDACTED] view.

[REDACTED] advised that Ireland has now agreed to bring in minimum unit pricing for policy from 1 January 2022. The significance is that it is now policy in Scotland, Wales and Ireland and the approach and adoption parallels smoking in public places. It does indicate the resistance in England to tackling big industry.

[REDACTED] noted the Irish Government does not actually have a gambling regulator.

[REDACTED] noted that PHE are very happy with what is happening with gambling in Scotland and bringing it into the public health strategies.

[REDACTED] has been attending the GC Board meetings and wanted to update the group. Both meetings so far have been staging (customer interaction, affordability, publishing operator data covered). The way the Board has been requesting the Exec to give early option proposals and then have several goes at getting to a position. On both issues there is progress. The consultation on affordability had 13000 responses and is really focusing attention on what should be done in the short, medium and long term. [REDACTED] happy to provide more detail but feels affordability is going in the right direction and the same is true

for working to get more data in the public domain. What is being discussed at the moment is some kind of report card – Board agree with ABSG that there should be greater transparency but exactly what that looks like remains to be seen.

■■■■ – work on financial institutions. Voluntary code of reimbursements is not working, Now looking to regulate and this is a precedent. ■■■■ to provide further details on approach.

■■■■ – Board were shown compliance rates on customer interaction and they were abysmal. Sense that what is in place has not effected change as yet.

Minutes and Matters Arising March 2021

The minutes of the meeting were agreed.

Gambling Act Review – Land Based Protections

■■■■■ joined the meeting to discuss land based protections.

■■■■ suggested that there were three key areas for ABSG to consider:

- What is our view based on the evidence?
- What are the innovations worldwide that we can draw the Commission's attention to?
- How do we futureproof any legislation relating to gambling?

In this session, the aim is to gather thoughts and views on these issues and consider what additional evidence we need to shape our advice to the Commission by the end of July.

■■■■ introduced the paper and advised that the Government has set out a number of specific questions. The Commission wants to respond to those points but we don't want to be constrained to just these issues. We want to use the opportunity to ensure that land based gambling can be made safer. The paper outlines three or four key areas for Advisory Panels:

- Player tracking in premises – not a new concept but delivery in the land based context has been very slow. Compared to the online space it seems an ongoing lacuna to have such limited capabilities in land based.
- Cashless Payments – the trends in wider retails economy are the declining popularity of cash. We want to think about the risks of harm as well as opportunities to improve safer gambling
- Risks of harm around increasing numbers of machines in casinos – light on current evidence on this and need to build the case on this area.

Tracking Play

■■■■ noted that the Commission was using papers from 2016 and 2014 – would have thought there would be more recent per reviewed evidence on these topics. The world was a very different place then.

■■■■ advised on the player tracking, there is a system in Sweden. Not sure there are any published papers but has been around for around 5 years and now also connected to online gambling. Also in regards to underage gambling. ■■■■ will check if there is any published evidence.

■■■■ noted that from Australia the latest news is a move to cashless systems in casinos. In New South Wales in-venue gambling is bigger than online (casinos and machines in pubs). Big casinos are moving to strictly cashless payments because of concerns around money

laundering. In Sydney, Crown Resorts are opening a new casino, and the operator had issues in their Melbourne casino with money laundering.

Cashless technology can be done in many different ways, and the player cards in Las Vegas are essentially a marketing exercise. But cashless can be done differently with elements of friction added – some groups in NSW want mandatory pre-commitments, or for example to separate deposits and winnings so that you have to receive winnings separately. Also the data element which is very important – the Lloyds banking study found some in venue transactions. Cashless system would produce observable data and create big data sets.

██████ – looking at the annexes, the survey from 2018 indicated that cash was a better approach for controlling gambling and spend. On the issue of tracking, the same people who would be policing gambling would also be using to promote the product. The same company tracking to provide harm reduction and suing for advertising purposes.

██████ – yes that was one of the key concerns – how operators might use data for commercial purposes is a barrier.

██████ – Difficult position to put companies in. They should not be both policing and promoting.

██████ – Wondering about the move to cashless spending and geographic differences as we have had issues around communities using cash and not having bank accounts. Some communities don't use banks. Is that important to consider here?

██████ – This is an ongoing conversation which tracks from loyalty cards to effectively the single customer view. If we push for this, should push for the SCV end of the continuum. Otherwise could atomise across the different parts of the industry and we lose opportunities to introduce better practice and better understanding. If there was a move to using tracking, there would need to be standardised thresholds across operators. Also note the point on different community approaches – and disassociation when using a card or app to pay.

██████ – ████████ has raised an important topic. Once we put land gambling into the mix of tracking it is more extreme problems that we are observing as a part of the individuals activity. We wouldn't just think of tracking to intervene in the way that we usually talk about. In retail premises in could be used very locally to alert staff if someone has been on a machine for three hours for example. In betting shops and casinos where the trade press are already talking about the unstaffed betting shop. In the industry there is often inadequate premises staffing to keep an eye on extreme behaviour so this technology does not just feed into a grand central system but could also be used for staff interventions on a short term and local level.

██████ – a bigger issue is the consideration of geographical spread of venues. There is a disproportionate number of betting shops in deprived areas. Could that be factored into the consideration.

██████ – ████████ did some research on this and confirmed the pattern – in addition to ████████.

██████ – ████████ did a paper with Leeds Council. (Was it [this one?](#) ████████)

██████ – would agree that is a good point. Similar situation with junk food. The problem we have had locally is that local government is so variable that gambling is not prioritised and local policy is driven by elected members. It is one of the arguments for getting gambling input to the Public Health framework.

█ – Glasgow whole system approach has the whole city and elected members behind it and if that was not there wonder what the council commitment would be to the issue. Points again to the implementation of the strategy. In terms of more casinos, what is that EQI approach. Women and men and the difference between visits to casinos and betting shops. Can we understand a bit more about the gendered nature of the issues.

█ – in the paper, point 10 refers to the mandatory tracked play and want to know what would happen.

█ – that relates to further down to line. Contrasting land and online that the performance of online is not good. However in the online space we have the ability to track patterns of play and spend and therefore operators have the capability to identify and prevent. In land based it is principally anonymous and cashless. If some similar ecosystem was available in the land based environment we would be able to hold them to the same level of account as our online operators.

█ – land based should not be less scrutinised than remote. Should be able to ensure that we can track to provide a level playing field for business. Would also like to see similar sanctions.

█ – if it is still a system which is similar to online where it is the operators duty then worry that you will still see low compliance rates as they have incentives to look the other way. Have the chance to design a system and could build in the harm reduction features from the outset. Could make those features universal and a great opportunity.

█ – attended a conference about the gamblification of games this week. One of the things that struck me was some of the survey data in the paper refers to issues around privacy and data. It is absolutely endemic – the companies know who they are and are targeting already. It is not an argument for inaction to protect privacy. There was definitely an age differential younger people are much more relaxed about what they put online, and there is an age related reluctance about moving from cash to cashless. Will this new legislation be fit for purpose for the next generation and the one after.

█ – the possibility to react and what we can learn from online strategies. Swedish companies have a pattern to call people when they see changes in their gambling. You can see changes over time.

█ – I am concerned that we should respect the rights of people who want to use cash and we don't want to exclude people if they want to use cash or don't have phones to use an app. As for privacy, I take the point that younger generations appear less sensitive to giving away data. People who use betting shops may not like the thought of people keeping a record of how much they are doing. There is no clear consensus across customers. There will be many people who will be uneasy that gambling should be monitored, Online I think there is an acceptance that online activity will be tracked. Bookmakers will be very pleased if they can have another weapon to keep out the bets from people who are too good at betting, If there was a system to stop people trying new shops to place well informed bets the bookmakers would be pleased.

█ – In thinking about those who are experiencing gambling related harm, the anonymity of cash based gambling could make it harder to have workable universal self exclusion schemes. Another benefit of mandatory tracking could help to reduce someone who has tried to self exclude can still bet.

█ – █ you can't give cash away! There is a culture shift in support of safer society. Unpublished work by NESTA about sharing health related data. If people have clarity and transparency of purpose then people are for it. Will share when available.

█ – On money laundering, if someone is going to a bookies with cash obtained through illegitimate means, I don't know if there has been any research on the extent of that practice. We focus on harm, but we also need to reflect that argument about addressing crime as that is a GC objective.

█ – can help – similar work with the banks to tackle issues with student banks accounts being used as conduits for money laundering.

█ – was part of a team report for European Commission on keeping crime out of betting. Betting in the UK, in contrast to casinos, was not rated high on the Government's risk rating. When we talked to Law Enforcement in Britain the main way that money was stored at bookmakers was in the machines, Small scale criminals would go to FOTBs with a 98% payback rate. Betting was not an efficient form of money laundering for the criminal.

█ – With lots of things that you use cash for or where there is an age restriction, you have to show ID. Is it a really simplistic thing to say if you want to use cash then you show ID. Have to think about working with cash as part of the equation.

█ – in part think cash is preferable as there is a limit to how much cash you can have, Frictionless spend through a card removes the physical restraint of a limited supply of cash. People spend more on cashless transactions.

█ – we will need to come back to you on number of machines and have recognised the complexities of moving to a cash free betting environment. We want to do some more work and look at the evidence – Australia, Nordic countries, EC work. Might signpost some of the money laundering evidence, issues on gender and locality.

█ – sometimes a topic just gets left alone – sometimes there is no evidence. The number of machines doesn't matter. You can't rule out that some people stay longer because they will have to give up their place. There are as many reasons for giving up on the restrictions as to keep them.

█ – On category C machines in pubs we flagged concerns as RSGB on the theoretical cost per hour. Don't want that to get lost as have advised that we wanted to return to that.

█ – thanks to █ and keep questions in mind.

Links and comments shared during this session

Re: move to cashless payments by an Australian casino group:

[Crown and Star to phase out cash at all casinos to counter money-laundering fears](#), Sydney Morning Herald, 13 May 2021

Re: betting shops in deprived areas:

[Betting shops in the public eye: A commentary](#) Peter Jones, Daphne Comfort, Tim Hall, Journal of Public Affairs, 20 April 2020

From █ to Everyone: 10:37 AM

To echo █ point there is a question of equivalence across land and online. Partly as a point of legal principle but also because otherwise we run the risk of driving the market in

one direction or another depending on permissiveness. That's a crude and sweeping statement but interested if it makes sense

From [REDACTED] to Everyone: 10:40 AM

It doesn't appear to be fair from my perspective, plus makes it even harder to provide a consistent approach and promote best practice. It seems like we have an opp here to plug a gap

From [REDACTED] to Everyone: 10:43 AM

[REDACTED] *for next CEO of the GC!*

I'm sorry I have to drop off for a bit but I wanted to test my own ignorance - I assume racetrack (of all types) betting is not considered 'premises'? Sorry for such an ignorant question.

From [REDACTED] to Everyone: 10:46 AM

For info - coincidentally Which launched a big Cash Friendly Pledge yesterday which the big shops have signed up to. I'm in favour of mandatory tracking across all sectors, but this pledge shows some of the public pressure supporting cash which remains.

[Some of the biggest names in retail take Which?'s Cash Friendly pledge](#), Which?, 13 May 2021

Re: money laundering in Australian casinos

[Hundreds of millions believed laundered at Crown Casino Perth through \\$2 shell company](#) (ABC News, 10 February 2021)

Re: Digital payments

[Digital gambling payment methods: Harm minimization policy considerations](#) Sally Gainsbury and Alex Blaszczyński, Gambling Law Review, September 2020

Gambling Act Review – Age Limits

[REDACTED] joined the meeting, and noted that LEAP will be considering this area of work next week.

[REDACTED] outlined the key issues for ABSG to consider in looking at the paper and considering their advice.

In relation to children and young people, [REDACTED] noted her attendance at the Montreal conference and that calls were being made for regulators to do more due to the increasing access to gaming apps that are socialising children to gamble.

[REDACTED] introduced the paper and explained that the Government call for evidence has closed and that the Commission is waiting for DCMS to ask for advice.

Three key questions in the paper:

- Available evidence
- Products
- Potential protections for young adults (18 -25) and what factors contribute to risk for that group?

traditionally family venues or a gathering place for teenagers. The latter is declining. Do have some sympathy with the notion that there are not many places that teenagers can meet each other.

██████ – would be nice to have more confidence in the data and the estimates of participation. 17% feels very different to what we hear on the ground and the 16 to 24 group is quite wide and very different environments and life changes represented. Combining ages may be masking significant differences. Can the data be broken down further?

██████ – on Category D, wanted to pick up the point on trivial amounts of gambling. It is primarily an activity for adults, one half is the crane grabbers and the other half is slots. The concern on slots is the mechanisms and children learning the way of gambling and the habitual activity. Not sure we should support arcades as a replacement for youth work provision but in terms of the transition from young person to young adult take ██████ point.

██████ – in Sweden have age limits but do have define the different types of gambling clearly. What we have seen is reduced gambling and reduced levels of problem gambling, from 18 and above, used to have highest level of gambling problems around 20 and that has now moved up to 30 (could gamble more freely prior to age limit change)

██████ – on Cat D, would agree with ██████ that the crane grab machines have gambling structural characteristics. The study mentioned earlier also included crane grabs – weaker associations but still risk - For crane grab machines, an adult problem gambler is 3.4 times more likely to remember frequently using them as a child, compared to an adult non-gambler. Three points to note:

- Cat D do come up a lot in Lived Experience conversation. Would particularly suggest looking the oral evidence from ██████ for the House of Lords report.
- Gambling related harm can take time to develop, won't necessarily see this immediately
- Don't like self report problem gambling scales, especially when applied to children as suggests that there is such a thing as responsible child gambling. From personal history of gambling underage, know that had to mature to be able to understand impact and actions.

██████ – what we are learning from Fast Forward and their education hub and the regulatory settlement which Edinburgh University are leading (Page 7). On delay, what can we learn from sexual health evidence in public health. Education, linked to knowledge, decision making and risk – might be worth looking at alternative evidence bases. Some really good studies in the Netherlands on early onset and education.

██████ – Page 4 refers to high value customers. Think that language should not be used as is positive in reference. What would the impact of being a VIP of a 25 year old on embedding that mindset. It is quite discretionary on the operators as whether they allow under 25s to be VIPs. Could under 25s be excluded from schemes?

From ██████ to Everyone: 11:40 AM
what evidence do we have about the links between children gambling at home (harmless games for example cards) and then adult gambling

From ██████ to Everyone: 11:42 AM
Agree ██████ we've raised this many times. Grooming language.

From ██████ to Everyone: 11:43 AM

Agreed [REDACTED]

[REDACTED] – Arbitrary decision as a society that we set a line around when people can legally do things, the brain continues to develop but have to set a line between childhood and adulthood. Additional barriers for different aspects of life could be very complex.

[REDACTED] – there is growing evidence of risk to mental state as the brain is more prone. Children's services in Birmingham go 0-24 because of that risk. Move away from arbitrary cut off to reflect research around mental health and risk.

[REDACTED] – don't agree that it should be back and white between 18 and above. Changes to legislation on motoring are more nuanced – the ability of new drivers to take certain journeys are limited based on their risk. In the context of gambling, one isn't thinking about what they are legally allowed to do but about how much caution there should be about monitoring their behaviour. Based on a [review of the ALSPAC data](#) at 17 years and 9 months and 20 years – found that between those two ages almost all those recorded as problem gamblers under 18 had ceased to be by age 20. There was an increase in the whole group prevalence between 17 and 20. In view of the high incidence of new problem gambling recommended lower thresholds for younger gamblers so should be more ready to intervene. We said 18 to 20 as we only had these two points.

In Patterns of Play online under 25s had very high likelihood of having an account but their spend was exceptionally low compared to other age groups. A sorting error resulting in excluding 25 year olds at one point - the 18-25 spending and the 18-24 spending were surprisingly different which might suggest that something happens around that age which impacts. Need more longitudinal studies which are high frequency – Canadian studies are very 2 years. The policy response would be to give special attention to flag activity at set ages.

[REDACTED] – I agree with [REDACTED]

[REDACTED] – good regulation is problem based and would lend itself to a more nuanced approach. Driving is interesting as it shows what is possible. On the paper, some of this seems to make a strong case for SCV? Does the progress report draw that out as we need to keep pushing. Correlation between exposure to advertising and social media posts – the emerging advice doesn't cover adding friction to that as a source or driver for behaviour.

[REDACTED] – they are connected and need to reference.
Need to have a look at the evidence available and have quite a lot that we can give you on the effect of children's gambling and adult behaviour.

[REDACTED] noted a recent study from 2CV on younger gamblers – in draft at the moment but flagged the importance of parental influence dna found increased propensity for young adults to become problem gamblers of the experience at home was either very positive or very negative (as in forbidden). Gambling Management tools are not always seen as sensible options.

From [REDACTED] to Everyone: 11:57 AM

I also meant to say it would be remiss of us not to acknowledge (AND BE THANKFUL FOR) the work that a number of current ([REDACTED] and previous ([REDACTED] among others_ members of this board have done over the years to influence the recent change to age limits on Scratch cards. I think we should again celebrate the trendlines as well as the headlines

National Strategy to Reduce Gambling Harms – Year 2 Progress Report

█ thanked members for their contributions to the report, especially █ and all members for their comments and █ support in pulling it all together.

█ suggested that the Board consider some particular areas where we need to clarify if we have got it right in terms of tone and emphasis:

- Metrics and league Tables. This was a prominent recommendation in year 1.
- Suicide and metrics, priority area in year 1
- Statutory levy – should we signpost advice more
- Referral pathways and relationships between third sector and the NHS
- Research on addictive products – have we said enough?
- Government and what we say about England and the lack of leadership from the centre. Inaction is comparison to progress made in Scotland and Wales.

Happy to take comments by email on any other issues, but key for today is a sense check on these areas.

█ – on suicide unsure as to how to get more traction. Have tried to engage locally and not sure how we can raise the bar on this issue. There seems to be a lot of barriers to information and partnership work.

█ – did consider referencing work with Surrey but was not helpful. In comparison the integration into suicide prevention in Scotland is developing. In England, the Primary Care gambling service has now got gambling on the e-consult.

Swedish study on identifying numbers – cannot replicate here as we do not have the recording systems available.

Frustration that it is such an important topic. █ will follow up again with Surrey as there has been a restructure on the Coroners service.

█ – did not formally feedback but share frustration. Could the recommendations be shifted to right up after the Exec Summary to highlight them. On the levy and on suicide, could we be more specific in the recommendations to strengthen the accountability element?

█ to follow up with thoughts on targeting recommendations.

█ – signalling on affordability and SCV remain fundamental. Would agree that the levy could be a driver of change but do not have an answer on the specific ask.

█ – on suicide, there is an issue that it is a hard topic to study and the lack of solid evidence is holding it back. Muggleton found a strong association between gambling spend and all cause mortality, you could weight that by size and demographics so you could get an upper limit on gambling related suicide in the UK. There are econometric techniques which could tease out a more realistic numbers.

█ – for ABSG there is enough to make a case for greater action but there is not enough evidence for those who need to take action. GambleAware and the Research Councils are not in place to take up this type of research, How can ABSG make the partners that can take action see the evidence available? Catch 22 – enough and not at the same time.

█ – contrary view. Evidence is not what shifts policy. Stories and patient voices and experience of families who have lost loved ones have mobilised in the alcohol related harm space.

From [REDACTED] to Everyone: 12:45 PM

Apologies [REDACTED] All three of my priorities are largely preventative so I do recognise the need to make a priority call for one issue on treatment. For me that has to be a sharp demand that treatment pathways are sorted (other, more informed colleagues can help us get to specificity) On suicide...the Samaritans have just started their work to develop their next UK strategy. Not an order of magnitude to include in this but an action to ensure we engage [REDACTED] who could facilitate engagement from GC colleagues if of interest, recognising existing relationships from previous work

[REDACTED] - I think you must have been listening to a separate chat [REDACTED] and I had. [REDACTED] we changed primary legislation 3 times, none of those were because of convinced Civil Servants but due to ministers who felt under wider emotional/public pressure to act. Not saying that is right but it is something I've flagged before. Anything we can do support/encourage the GC to invest directly and indirectly via EBEs etc to apply sophisticated emotion not just reason to how we campaign should be commended

[REDACTED] – went to the roundtable on suicide hosted by Gambling with Lives. The conclusion was very much along those lines, and the unique contribution of those with Lived experience is to present evidence from their experience. If there is a form of words that can be used – feel that the reference to disappointing progress is not yet correct.

[REDACTED] – unforgiveable lack of progress?

[REDACTED] – fair, given the consequences and impact on families.

[REDACTED] – who are we directing that comment at? Discussed with [REDACTED] being clearer about who recommendation are directed towards. Slightly nervous about the strength of language but need to be clear about who that is aimed at. In reporting on the progress report you are advising a range of people, not just the GC.

[REDACTED] – Adverse childhood experience (Wales) influenced Scotland to embed the work and start using an ACEs approach. Can point to that as a counter to the lack of evidence.

Seeing the patterns: 'important patterns are often obscured by data gathered by services and systems divided between individual presenting needs and between life stages. When we can't see these patterns, we are doomed to repeat them.' [Hard Edges Scotland 2019, Robertson Trust, Lankelly chase](#)

[REDACTED] – are we saying enough about government and leadership in England? Excuse being used is that waiting for the PHE evidence review before can make progress. [REDACTED]

[REDACTED] at the ministerial round table was very clear and forceful on the issues that concern us and the evidence review will make some clear recommendations and statements on what needs to happen. This goes to the challenges around referral pathways and the tension between the third sector view and the NHS view. How do we navigate that?

[REDACTED] – two problems. DCMS focus is on the revenue obtained from gambling. Because Gamble Aware have positioned themselves as a treatment provider it relinquishes responsibility for any other agency to step up. It is not clear what is and what is not classified as treatment.

[REDACTED] – could one say that it is disappointing that there has been no progress and would be unforgiveable if the PHE review is not a springboard for immediate action.

█ – as long as there is hesitation, there is a risk to life. Can be emotive without apology.

█ – on metrics and league tables, since the workshops, things have progressed. Initially there no appetite and now the Board are supportive of the idea of grater transparency and more in the public domain. Have we got the balance right in terms of what we say about the Commission. █ was keen to not focus on details in this report. By this time next year if we can't say something definitive than have to come in much more strongly. We are currently encouraging progress that has been made without making too much of a judgment on the Commission.

█ – could be stronger in what we are saying.

█ – Should be bolder and need to consider what will have wider interest

█ – the opportunity of the times that we are in – a willingness of leaders to do something different and address inequality. Pace is important but so is intention.

█ – one of the nuances is to be aware that what we say in different groups will be heard in different ways to what we say to the Commission to which we are an advisor. We need to ensure we deploy that power carefully. We need to be intentional about the exec summary and the recommendations – if it is not there it may not be read.

█ asked that members put forward any additional thoughts on the Progress Report by email, especially the Exec summary, recommendations, language and tone.

Comments from members leaving the Board in May 2021

█ shared thoughts and reflections on the departing members

█ I am very conscious of how well you have used your political acumen in our work, and you have been an important part of the Commission's work for so long. One of the things that I read was you talked about oceans of justice and rivers of fairness and I thought that was a wonderful phrase to guide and lead us.

█ when we first met, we disagreed about prevalence and problem gambling. █
█
█

█ I think about you with all your many hats and such a huge knowledge. █
█ Your conversion to Public Health and what an immense contribution you have made to Public Health and the gambling work we have done together.

We are so sorry to be losing such a rich and diverse group, but we hope to be keeping in touch with all of you and calling on you when we need you. Grateful for your contributions and the learning from each of you.

█ replied to note that you mentioned the paper on Macau and that does make me say that some of the things I have tried to get the Board interested in I have failed, The employees of the industry are often people who experience harm themselves. We don't know whether it is because they work in the industry or if they are attracted to it. In Britain, in these years of the strategy we have never paid attention to the employees of the industry.

█ gave her thanks, have enjoyed having you as colleagues. Leaving ABSG brings an

end to a 16 year association with the Gambling Commission, and I want to flag up how far we have come.

█ advised that he would echo those words, this has been quite an unusual committee. It has been hard work but well organised, well chaired and it has been fun. Thanks to █ and all the team. It is more difficult to see the fruits of our labour than other organisation – we should recognise that we have come a long way. Two chairs have been incredibly hard working. Broadened my horizons – stumbled onto gambling and has brought home to me the power of addiction and the power of the industry and the damage not just to individuals, but to children, families and community. Satisfaction is seeing the public health lens used much more.

█ – thanks to all of you. The gambling world we worked in looks very different 5 years ago when I first met you to where we are now and am I optimistically confident that you have effected some of the change.

ABSG Notes 15.07.21

In attendance: Anna Van der Gaag (Chair), Jane West, Lou Baxter, Hermine Graham, Cath Cooney, Philip Newall, Ulla Romild, [REDACTED]
[REDACTED]

Apologies: [REDACTED]

There were no new declarations of interest.

Minutes and Matters arising from May 2021

The minutes were reviewed and agreed.

Introductions, updates from Board Members & horizon scanning

[REDACTED] provided an update on the GC Board meetings which she now attends along with the other two Advisory Board Chairs. The Chairs are there as observers and are still unsure as to how best to contribute but feels that the Commissioners are getting used to the Chairs being there and invite their views. Previously there was only an annual update whereas now the Chairs are there for part of every meeting.

The discussion on the Gambling Act Review at the last meeting was also attended by [REDACTED] [REDACTED] from DCMS. He talked about the 16000 responses to the call for evidence and advised they were in two categories – one around ban, on around keep. Around 500 substantive responses amongst those 160000. DCMS were particularly interested in stake limits, consumer redress and tackling the black market. They are already aware that they need to address tighter controls online, especially in relation to young adults. There will be a white paper at the end of the year, and a ministerial speech in August which will set high level direction of travel. From DCMS it is all about balance – we should expect there to be a loosening of some rules, e.g., around Mayfair casinos.

For the purposes of ABSG, this is our last chance to work out the must haves for us as a group, in light of what we are being told by DCMS about their priorities. Whatever we say, this is going to be a political decision. For [REDACTED] it is disappointing to say there are 16000 responses but only 500 are substantive.

Meetings with the Commission are going well, and Advisory groups are building trust as critical friends. Feels there is opportunity to influence – for example on statistics, [REDACTED] and [REDACTED] made clear points about why there should be caution in going down the road proposed. [REDACTED] provided some useful detail to support that, and work has now been paused. Feeding in specific evidence and setting out arguments through advice is our role.

[REDACTED] explained that there was a consultation on a change of approach on participation and prevalence statistics where the Commission proposed to do more work in house. The debate is around how much is put out to external parties, and the desire in the Commission is for a quicker turnaround. [REDACTED] has argued that whilst there are disadvantages to using external agencies, there are major advantages in independence and comparison, methodology and replication over time. Commission will come back for a more in-depth discussion – may be helpful for [REDACTED] and [REDACTED] to get involved.

█████ advised that the pieces in the advice on player tracking and SCV were key, there are weaknesses in the current three data sets. Behavioural Insight team's recent data sets shows that operators typically transact with 3 or 4 operators. A single customers interactions could be across multiple operators and the current real-world data is limited in showing that.

Single Customer View and how that can be achieved remains in question – advice needs more details as to how it could be achieved. █████ explained that SCV is about customers actual play data with operators. When an operator is looking at markers of harm currently, they are only seeing one set of interactions, rather than the customer's entire play. The idea of SCV is to flag customers in a commercially sensitive way. The second dimension is on a research and analysis perspective.

█████ noted that █████ argued that gamblers lie. Using a self-report methodology means that people are not giving a true picture. Using SCV to have sight of spend patterns and play across all operators is a key goal.

█████ commented on the feedback from DCMS – noted that █████ had commented that public health has to be the first priority in response to Ruth Davidson's film on gambling in football.

█████ advised that she had been in touch with Surrey Coroners service regarding the link between gambling and suicide and is awaiting a call. There has been a shift within the banks to do more around prevention on both scams and gambling.

█████ attended the launch event of the behavioural Insights team research and the personal services research team at the University of Bristol. All good signs of progress on a more proactive stance.

The Muggleton/Lloyd's banking work shone a light on what can be discovered through sources other than self-report.

█████ – the Strategic Implementation Group Scotland had a workshop in between meeting which went well, █████ sensed much more willingness to collaborate. █████ was there and spoke a lot in the workshop. █████ is hopeful for the meeting next week. █████ noted that the RSPH have launched a [level 2 award on tackling gambling harms](#), aimed at those working in the industry. GambleAware and the Beacon Trust attended.

The █████ 'Don't bet your life on it' is part of the Level 2 award. █████ also joined the RSPH webinar and noted that GambleAware talk about prevention in a different way to the usual public health approach. The new Office of Health Promotion has three core workstreams, one of which is addiction and gambling is referenced.

█████ attended a session on gambling at the WHO Forum on Alcohol, Drugs and Addictive Behaviours. █████ attended a session on gambling at the [WHO Forum on Alcohol, Drugs and Addictive Behaviours](#). Africa and Asia reported increasing gambling and the need for a global perspective on prevention. This was the first time that gambling was included in the main agenda. Continued interest in gaming, want to have their own instruments for measurement.

█████ asked if they placed gambling harm in the sustainable development goals. █████ responded not yet. Swedish government have a five-year strategy for alcohol, tobacco and drugs which does not yet include gambling – getting recognition and integration at national level will help.

Gambling Act Review

█████ proposed that ABSG work through the 14 pages of advice, with a specific focus in children and young people, land based and consumer redress, as these are the least developed areas of the advice.

More detail is needed on international perspectives and examples of good practice, as well as considering how much of any of this could actually be translated into law. The legislation needs to be mandating elements not included in the 2005 Act. The fear is that ABSG present a wish list which cannot actually be translated into legislative action.

█████ advised that current developments in Australia are focused on investigating the large casinos and the role of the regulator. █████ noted that the duty of care appeared to be different in Australia – ABSG have said that duty of care should be applied to the industry.

Children and Young People

█████ noted that the advice section does not currently set out exactly what we are asking for. What do we want to say about children and young people, their characteristics and risk, but equally the product design and how products put children and young people at risk?

█████ noted that the developmental stage and brain development around adolescence, executive function and impulse regulation means that children and young people are less likely to be able to regulate themselves and if exposed to gambling products are more likely to use it in an impulsive way. The impact of early big wins, and the ability to make a lot of money quickly also needs to be considered.

█████ considered the rhetoric that we take on a public health approach, when there is not a public health approach mandated. What kind of things could be legislated? E.g., mandatory operator reporting. The other big element is around creating lifelong habits at an early age – the ambiguity around lootboxes – it could be legislated and that would make a difference.

Is it Nevada who do mandated monthly reporting by operators? █████ to check

█████ noted that we have regulation that already fits this in consumer protection (pester power in relation to advertising to children). There should not be adverts in children's products so could frame some of what we have around the consumer protection and the Command paper on the Competitions and Markets Authority. The ASA already have enforcement powers under this legislation, but they are not applying it to gambling. █████ noted that there is legislation on junk food advertising, but it isn't used – it has that window of ambiguity which the operators jump on.

█████ suggested that the way around this is to commission legal opinions. ABSG could get advice to interpret that law.

█████ – existing legislation is overly subject to interpretation as to what does or does not have an appeal to children. █████ suggested that there is not such a gray area, but it does not match up to real world action. Quite a lot of work has been done to consider what appeals to children.

█ – are we agreeing that reduction in exposure is what we should push for rather than making more use of existing legislation? █ – if you go any other way than reducing exposure you will get into lots of rabbit holes.

█ – I would agree. If you don't reduce exposure, then you get into a lot of technicalities about what is allowed when.

█ – there is legislation around aggressive practices that could be applied to gambling. On exposure, if we could advise a gambling company that there is a potential criminal offence then they will be more likely to comply in removing it. Need to provide guidance or an opinion to say that it is breaching this legislation.

█ – trying to get the legal system to respond is very similar to approach in Sweden where existing laws are responding to new situations arising around gambling. New legislation from 2019 in Sweden references duty of care and specifies that companies are obliged to report statistics. They are supposed to report actions taken due to signs of problem gambling.

- Using existing legislation more effectively
- Legal limits on age
- Limits on exposure
- Mandating reporting of activity on accounts and actions by operators in response

█ – how does mandatory reporting fit into the CYP section. Under 18s should not have anything on account, so this tool and suggestion should be added to powers and resources.

█ point is that if you had that kind of reporting it would raise accountability and limit the ability for operators to allow children to gamble – a disincentive through increased transparency.

█ – advice needs to be clearer around limits on exposure.

█ – banning lootboxes for under 18s. The use of AdTech and delivery of gambling ads. If you search for help you still get gambling ads. There should be a prevention of ads on any platform which is available to under 18s. █ – I think that is already the case, as that gambling adverts should not be included in children's content.

█ noted that all the advertising issues were part of the ad-tech challenge and the code which BGC accepted. Keen that the advice is not taken to be covering work that already been done.

█ reviewed the notes from █ and refers to the study on depth of recall for gambling advertisements. That might be worth referencing, as well as her references to exposure and the normalisation of gambling in sport.

█ noted a reference in the public health piece about children recognising brands. With regard to outdoor advertising, the normalisation comes from that subtle exposure.

█ shared a link on the banning of advertising in Spain: [The Big Step on Twitter: "Officially the end of gambling advertising and sponsorship in Spanish football - congratulations to our friends in Spain who fought this campaign and won €s](#)

exposure is working on so many different levels and that is why voluntary codes are not enough.

█ that is the right space. Noted █ view on smoke free places – the exposure, the connections with sport and the pervasiveness is a part of the debate which is still to be had. That then brings in the issues about development and harm and sets a coherent narrative.

█ noted that ties into the system wide approach to public health. Current narratives around the commercial determinants of health – big tobacco, big alcohol and now big gambling and the pursuit of profit.

█ – if we are trying to get in the Ministers head and influence the Commission is language like commercial determinants could be a step too far. Could describe the concept without using the term. Public Health is often understood through the language of prevention – talking about whole systems might again lose the audience. We need to frame our advice clearly.

█ noted that prevention in public health is about stopping the issue from occurring, not dealing with the issue when it has already manifested.

█ noted the GambleAware study on marketing spend online being higher than football. Minister has recently said there is no proven link that advertising causes gambling behaviour so do worry that we could overplay our hand in talking about exposure. What is the strategic angle here? Need to ensure that the arguments are backed by evidence.

█ – lots of public health issues don't have the evidence that politicians want in policy making. There are comparisons to other areas of work.

█ – a statutory levy on prevention – should we repeat that at key points in the paper?

█ – a lot of the things that might need to happen are probably around what social media companies need to do. If social media companies can't address racist abuse, what hope do we have on the exposure to children. Is there a line about greater responsibility on online protections e.g. around children following gambling operators on social media. Can we push that debate about responsibilities of social media companies into this space? Is there a way in which the environment should change to prevent that?

█ – impact that gambling has on a child in later life. How do gambling problems as a child or an young adult affect later life? That should be a good argument around considering the consequences of gambling. My feeling is that there are quite a few studies that early onset gambling means you are more likely to continue to gamble and experience harm.

█ – in the headline recommendations, could there be a specific recommendation on children and young people? Thinking back to our previous advice we set out some key messages – could those be moved up to a headline?

█ – do we know from the DAP if they have any insight on social media that we might learn from? █ advised that since █ left, it has not really been an area of expertise for many members. Their headline view is how difficult it is to manage exposure when marketing and advertising online is developing so fast. They were interested in more reporting and more transparency.

Stakes

█ – like the citations on online gambling as a risk factor for problem gambling. The availability of online gambling in the UK is extreme as compared to other jurisdictions. Australia doesn't have online casinos, only online sports betting. Product specific recommendations will be strategically weakened over time. New product development often works around those that have been strongly regulated.

On online stake limits, is there anything more we should be saying? █ – nothing to add to the draft advice specific to this issue.

█ – there is another angle. The deposit limits is one element – Sweden has this with registration of gamblers.

█ – Paragraphs 16 to 21. Stakes, speed of play and characteristics of online products should parallel any offline version.

Sections 20 to 21 talks about controls on deposits and losses. Is what the Commission is doing on affordability enough? █ – could we include something in there about the Swedish approach.

█ – in Sweden a survey on limits was largely positive, sampling gamblers and non-gamblers. These kind of regulations could be both safe and effective. █ – that would be useful to quote as the industry arguments have focused on limits restricting consumer choice.

On signage and warning labels, █ noted it was the least restrictive intervention from a public health perspective. It is a strategic approach to one of the easiest changes to make and get support for. There are some good studies to show that this approach can be effective – it's not the strongest intervention but in combination with other actions it can have a useful role to play. Link shared: [Effects of front-of-pack labels on the nutritional quality of supermarket food purchases: evidence from a large-scale randomized controlled trial | SpringerLink](#)

█ noted that the new GC CEO Andrew Rhodes █

█ In his view requiring greater transparency is a key piece of work.

█ – there is the other type of warning labelling with generic safer gambling message. The generic messaging should be mandated in terms of content. There is a project here looking at alternatives to that type of messaging which is a really hard nut to crack. Some people want very hard hitting messaging akin to smoking, but the studies so far show that does not go down well in focus groups with people with lived experience and policy makers.

█ asked if there was experience from other campaigns that could be relevant?

█ – █ point that generic messages should not be designed by the operators should be a strong principle which should be expanded across that section. Do not want the operators to be explaining things to consumers on their terms.

█ – are you suggesting that every single company has to provide details, is that done by the Commission is requesting information and setting the format for communication?

█ – it probably has a parallel to powers and resources that it would need development, design and research to makes that useful and impactful. At the moment the Commission does not have the budget and skills to do that.

Can we say anything useful about what is happening with food, and how that is monitored?
How is compliance monitored?

■ – is there any type of labelling at all on gambling products at all? ■ – in online casino there are four different options for what they can put, and they always choose return to player. Has to be reasonably prominent – ■ has done a study on this and ambiguity in legislation generally means that operators interpret that in the way that is least helpful to consumers. The exact presentation and words used is a really important thing to get right.

■ noted that Swedish law requires operators to refer to the National Helpline for gamblers. The UK license regime requires online operators to sign up to GamStop and to promote support.

■ noted that lived experience have a line 'Don't bet your life on it'. There is something around health education and experience from other consultations around putting calories on food. There is something about people being able to select based on information.

Consumer Redress

The current advice sets out an alternative to an Ombudsman following a model used in the banking industry, based on a voluntary code.

■ – can I question why we think an Ombudsman is not likely? Conversations internally suggest that there is quite a lot of appetite for an Ombudsman at DCMS level.

■ – what is the current option for the consumer?

■ – there is ADR now but only on contractual issues. They go to company first, and then to the ADR.

■ – would an Ombudsman have greater reach? ■ – the proposal covers a voluntary code and doesn't fully work in the banking sector.

■ – the Commission Board had a sense that in creating an Ombudsman would lead to an increase in gambling harms and gambling suicide because people see that there is an option for families to get compensation. ■ did not agree with that approach and the damage done by companies not acting was greater than the risk done. Let's ask for what we can get now.

■ – is it worth putting in that thinking around the different layers but this is what we think is more achievable.

■ – there is a lot of work around sector specific charters, and seem to get more buy in from sector led approaches.

■ – sensible proposal to have a Plan B to hand. Could be included in the league tables so that consumers could consider compliance as well.

■ advised that in her view a lot of the issues are about practicality and money, so are considering what is possible and based on a model being used on a comparable sector. What it does not do is assist in how the Commission is dealing with calls. In powers and resources that element needs to be considered about the Commission's own response.

■ suggested that the bigger issues is around how the Commission manages consumer contact – whether signposting to the ADR or an Ombudsman, or collecting relevant information from consumers to inform our regulatory work. The current Commission process is to [refer consumers back to the operators](#), who are required to provide a complaints

process and to give access to ADR providers under the [LCCP section 6.1.1](#). ADRs are approved by the Commission. Operators are also required to [report on complaints](#) and ADR referrals through mandatory regulatory returns.

█ noted that an Ombudsman would not necessarily be more accessible as they are typically the final stage. The code could also include trigger points for the Commission to act if too many complaints are being referred to the ADR.

█ suggested that the wording needs to be tightened – link to current guidance and LCCP requirements. The new system was require as a condition of licence information to be published on complaints and outcomes, with the stick of licensing, and the offer of a voluntary system which will become mandatory.

█ noted concerns about people being able to articulate complaints. █ noted it was a recurrent issue in the lived experience community.

█ – LEAP are likely to recommend an Ombudsman. Note that we share the same goal but consider this proposal to be more likely because of cost, engagement with the industry and the testing in a related sector. Setting up an ombudsman means a whole new organisation, resourcing etc and this proposal is about acting quickly, decisively, with industry engagement and with a clear link to the licensing regime.

█ – need to be conscious is that the gap you are signalling in terms of the current system is around the needs of people who have a complaint and are suffering harm. One of the concerns from LEAP was that in referring people back to the operator you are putting them back into a space where they have experienced harm. Anything that reflects improving trust and supporting people experiencing harm.

█ – to create a independent code, could be done with 12 months. All the focus in this proposal is on the industry to act.

Land Based Protections

█ – the idea of getting the best data and the best potential consumer protection measures together is a real focus. Looking at thinking big and bold about the potential of SCV, tracked play and consumer protection. There is advantage in trying to address land based and online gambling at the same time. Neither the Behavioural Insights or the Oxford studies track land based gambling so struggling to have a good understanding. There have been no new developments in NSW but it is a key issue for my interests so will keep ABSG informed of any developments. The current drafting is good as is.

█ – can make more of the Oxford and BIT study and what we can understand about online as part of an argument for parity.

█ – very different set up for UK. Turning land based gambling to digital payments – in Sweden need to have a players card to play, which saw a real reduction in monies spent for some time. There was movement to online, but the first reaction was that people did not want to register their gambling. Now people have to identify themselves each time they log on for online gambling. █ – would be good to reflect that narrative in the advice around initial reluctance, reduction in spend and the identification across online and land based.

█ – how will machines be managed, and how will proposals impact on real life play when people are using multiple machines simultaneously? █ – in the Swedish system can only gamble on one machine at a time as you have to logon to the machine with an account.

In Sweden there is only one operator for the gambling machines to have a single unique account for each customer.

■■■■ – public health approach and clustering of premises in the most disadvantaged areas. A few local authorities have started looking at that through planning but that could be more centrally legislated. ■■■■ – there is a draft at paragraph 80 to be fleshed out, and notes concern about clusters in areas of deprivation. Are ABSG happy to focus on clustering above machines in casinos?

■■■■ – issue is both number of machines and the range of venues which they can be placed in. ■■■■ noted that there are currently limits on machine numbers, would not see numbers of machines in casinos as a particular priority. Emphasis should be on disadvantaged communities – do we have anywhere that would give us access to the most current LA decisions on giving access to licensed premises?

■■■■ – in the past the Commission has complained that LA are not carrying out the local checks and enforcement that the fees are meant to pay for. The issue of clustering may have been overtaken by COVID. Not much current knowledge on this issue.

■■■■ – paper shared yesterday adds to the context of why place matters in terms of deprivation.

Powers and Resources

Have we been clear enough on issues beyond the statutory levy? Should we be more specific on general resources, the role of data and potentially a data repository.

Have noted the need for increased resources on monitoring social media, generic messaging and accessibility. Paragraph 40 does suggest a data repository but does need to be more specific on the management on that data. There is a difference between individual and population level data so what are we asking for? The point on tracked play is that it would provide access to both. It is one thing to say the Commission should have the power to ask operators for that information – note that discussions on SCV are progressing. ■■■■ suggested this could be dealt with more neatly with a link to the SCV work and the call for gambling to be covered in the Public Health Outcomes Framework.

■■■■ – on powers and resources, if this section is about what additional powers and resources the Commission should have we are asking for a single customer view.

■■■■ noted the PHOF ask is flagged and ■■■■ advised that mandatory reporting would also support that if the data was provided on a local authority area basis.

■■■■ – the SCV would make it possible to aggregate data up – would not have to make estimates, would know how many people are gambling in each postcode, what the spread of spend is like – so many longstanding open questions that could just be answered.

■■■■ – need to cover the point about confidentiality. Is an ask to operators comprising GDPR?

■■■■ – suggest that for this document don't need to be too specific on the ask around data. The principle is more important to get across – the data is important, it is available but not currently used in this way, keen to ensure that issues around privacy and GDPR are addressed. Paragraph 40 to be developed to include mandatory reporting at local authority level.

Review of full document

- Points on CYP to be added to the background section
- Suggestion to start with key recommendations, and to add a section on where the recommendations are aimed at/mechanism for delivery.
- Consider if this is a recommendation for legislative change or something that you think the Commission can do now? Could also capture elsewhere the items where you think that other agencies need to act. As this is advice to the Commission on the review, need to focus.
- █████ noted that LEAP will start each section with headline recommendations, with detail below. █████ – ABSG’s contribution to this process is about the published evidence from research so we have set out a problem, recommendations and evidence to support.
- Need an Executive summary and key priorities. █████ asked that introduction reflects the public health approach and recommendation that it is delivered.
- █████ – concerned to not to draw attention in the initial section to the elements we think are wrong and/or are not happening. Recognise that we need a public health approach and that these are the things that we think could deliver that.
- █████ – note on prevalence that we cannot see the full scale of the issue simply from prevalence numbers, and also to reflect affected others which is currently not referenced.
- On style the numbered recommendations should precede the context or take the numbers off.
- Start with numbered recommendations – either short or detailed with nuance? █████ – start with one line summaries, then context and detailed recommendations.
- A lot on lootboxes, but have already published advice so could shorten the section and provide a link to published advice.
- On other priority topics, note mechanisms for delivery and note other agencies that have responsibility in this space. █████ – ASA considers 16 upwards to be an adult, and we are saying 18. Can we reflect that? TL to check. Link to ASA Guidance on Age restricted ads: [Age-restricted-ads-online-2021-guidance.pdf \(asa.org.uk\)](https://www.asa.org.uk/age-restricted-ads-online-2021-guidance.pdf)
- Members to submit any additional comments ASAP.
- Section Two on supporting evidence is currently in a range of formats. The original plan was that a key piece of evidence should be summarised in the couple of lines, then a list of resources. That would be an accessible topic based approach. Members to edit relevant sections.
- What is the difference between what the ASA require in relation to children and their requirements in relation to YP? █████ to check
- In reference to the lootbox issue should include more than just a link to our previous advice as it is a major issue. Currently have paragraphs 56 to 64 and that should be reduced.
- Black market was mentioned as interest to DCMS – need to ensure that is covered. █████ noted there is a reference in powers and resources which needs some development.
- Turnaround by the first week of August to start refining the next draft.

ABSG November 2021 Meeting

Session with the GC Research Team 17 November 2021

In attendance: Anna va der Gaag, Cath Cooney, Ben Haden, Laura Balla, Helen Bryce, [REDACTED], Ulla Romild, Lou Baxter

The Research Team shared a slide deck prior to the meeting. [REDACTED] explained that the current team has been together for around a year and work is now focused on business blocks rather than the previous research and statistics teams – understanding the consumer, understanding children and young people, understanding gambling harms, understanding the market, and a developing block on evidence assurance and authoritative voice.

The new arrangements have been helpful and the team are based across two or three business blocks apiece. This has been beneficial for sharing knowledge and expertise across the team and getting people used to dealing with data in various forms.

There is further work ongoing on improving data quality and enabling us to do more secondary analysis. There is a far more interesting world in terms of access to large data sets from operators and financial services. On participation and prevalence there is a question on linking together all our data. The goal is to have a more planned approach rather than the previous iterative approach.

Market Impact data from operators is a good example – we are able to collect and report quarterly in ways that enable the Commission to see swiftly what is happening. That has changed mindsets about what is possible and how data can be used close to real time to identify risks. Helping the business understand evidence, improving the data and providing the best analysis we can are the focus points.

Stakeholder pieces of the P&P work have brought in lots of difference views and real life perspective which has been really valuable. [REDACTED] noted that he is keen to develop discussions about our data – in terms of our authoritative voice this is the first step.

[REDACTED] responded positively to the developments described. The changes she has noted are about working across the Commission and moving away from silos and the outward facing direction. From last week, it was great to see engagement with leading international experts – a really good model to build on and the opportunities of remote working are huge.

[REDACTED] noted that the wider engagement and networks are key to how advisory groups will work going forward. Sessions will be less about when someone has a question but more about bringing in expertise from your own networks. Those sessions will add huge value to the Commission's work and remote work opens up so many opportunities. [REDACTED] noted that 3 stakeholder workshops over 2 days were held and were so straightforward to set up.

[REDACTED] noted that people in academia will give their time if there is an element of impact for them – a key metric for academics is whether their research has impact so there is a benefit in kind in engaging with a regulator.

[REDACTED] noted that the blocks that were described brought the slides to life and indicated that there seems to be some success in bringing people in across the Commission. There is an increasing interest in data and in public health, including gambling. [REDACTED] explained that she has been working remotely for a long time and has found the extension of remote working to

bring added value. The networks have always existed in ABSG so if there is more of an appetite to develop that it is positive.

■■■■ explained that there is a stakeholder mapping exercise in place for each block which will cover who we need to inform and who might be able to help us.

■■■■ advised that the blocks have been used to distil key issues and identify what is missing. Over the last 6-9 months there has been greater understanding of the kinetic experience of harm – it's not the same people, there are different times, reasons and places. There is more conversation – that comes in some ways from the nature of data that people are seeing – for example the Muggleton work. In the absence of previous longitudinal work it is difficult to present that it is different people at different times.

■■■■ noted issues about qualitative data and the why people move in and out of harm – there is a need to listen for the data that we do not have. ■■■■ related that internally those triggers and where one might help someone is quite a live debate. The data quality map as it stands covers some of the basics.

■■■■ noted that ■■■■ has written a report on consumer vulnerability – the format and the data used is an interesting example of drawing out the qual and quant data. The Commission is using binge gambling examples that have really hit home with DCMS and that narrative is important. But with an academic rigour that on some of the work done in the efforts to be visual and accessible there is a risk of mixing the qual and quant and having people question if the data is robust. When the Commission used the 2CV data in the assessment last year would question how that was presented. PHE looked at 4000 studies and decided that there were 38 that were suitably rigorous for inclusion. ■■■■ noted that the Commission should be mindful of how those who care about rigour will perceive that.

Using 2CV and Patterns of Play in the same frame gives concern – how does the Commission ensure that in pursuing robust data the field is strewn with studies that have been funded or influenced by industry or are just not good.

■■■■ asked if there are any fields that are getting it right in blending data with the ability to tell a story. That is challenging – we want to lead with stats but there does need to be a story. ■■■■ suggested speaking to ■■■■ and ■■■■ at PHE. Recent reports from ■■■■ – the second report is a good example of presenting data – but their data is from statutory services. A good model would be the government publications on drug and alcohol use. ■■■■ asked if the point was the mixed presentation and ■■■■ confirmed that it was.

Lancet paper – the problem with the 1.2% is that it hides the sub groups where up to 50% are problem gamblers. What does the 1.2% actually mean – we need to start foregrounding the financial burden and using the recent and robust data rather than the stuff that is highly contested and misused by people on all sides.

■■■■ noted that the team have agonised over some of the 2CV work and how we present is always improving. Part of the issue is that anything we put out is used in ways that we would not wish it to be. He has been really keen to get data out and get the Commission used to getting data out on a regular basis. We have a challenge in just getting minor changes to the website! What we want is to present how we see the world – through our output and others – but we don't really have the vehicle to do that as it stands.

■■■■ asked about people about ONS and OfCom. There is a director on online harms. ■■■■ explained that we are linked in with the GSS, who have a best practice team focused on statistical presentation. We have links with their quality champions, harmonisation

(focused on survey questions) and presentation leads. A few years ago we asked them to peer review our young people and gambling reports which was really useful. The ONS have some excellent contacts – we have gone to them with some quite specific methodological questions e.g when GambleAware published their Patrick Sturgess paper on methodology. We looked at that with ONS. We have also taken advice from ONS on the P&P methodology consultation.

█ noted that triangulating from all those different sources is helpful. PHE mentioned the loneliness survey – lots of people had mentioned it, but when David Cameron got interested it happened and is now part of the PHOF. Getting that ministerial push https://gamblingcommission-my.sharepoint.com/:f/g/personal/gbridgwater_gamblingcommission_gov_uk/Eoszgw9jHXIANrSS2PPdoxMBIrr0fmWLLt8S4Zu5yp2mrw?e=Gz4Nc9o bring gambling into statutory vision is the key.

█ noted that she and █ were speaking with civil servants about smoking cessation – it was an MSP with personal experience who went above and beyond to get it. Personal stories have influence. Finding the key piece of info that is based on rigorous data.

█ noted that we need to do better than the 1.2%. Andrew is very keen for that to not just be brushed aside – what happens when you apply that to groups of interest, we need to work in a smarter way. We intend that all this grows and improves – █ would hope that more and better work will come, especially with the new methodology in place. █ noted we are currently restricted on the relevance of the data – we have really good ambition.

█ asked about factor analysis going from 27 to 10. The final 10 are a mix of feelings and behaviours which is a different approach. █ noted that the length of the survey, the circumstances and the incentives available can all affect participation.

█ noted that using incentives for surveys was not usual in Sweden. A more important factor is making people think that this is an important issue. █ noted that the team have been thinking about a name for the survey and how to explain the benefits of taking part. Considerations include the presentation of the survey document, how they are branded and the possibility of using a government logo.

█ noted a conversation about attracting people in – we need some new messages and we want to hear from people who know about gambling. Start from the premise that you are the expert and we want to know what you think. █ noted that people who do gamble often do not class themselves as gamblers. █ suggested that the word gambling is almost starting to get in the way – so many people do not describe themselves as gamblers. We want to cover both legal gambling and activities adjacent to the gambling world. Gamble is not the language that people use – people play bingo, or play the lottery. In the industry session they talked about the fact that their consumers talk about playing – that does corresponded with what we have seen about how people describe what they do.

█ suggested something on money and leisure. There is some friction in a paper survey arriving in the post. If sent by email might be considered to be a scan. A QR code process might be an option to consider. A letter with a Government stamp could be offputting for some people.

█ asked about the percentage of returns on surveys. █ explained in a prevalence cohort of 25000 they got just under 30%. That was with an oversampling of young people and people at risk. On a follow up sample of people who had been interviewed twice before got a 64% return rate. A National Health study gets around 40% with postal and web access. The survey was one page and is translated into English.

█ noted that the aim is 34% with two reminders.

████ suggested asking LEAP about a survey title as well other networks. █████ noted that LEAP had given good advice on assurance on confidentiality and ensuring that people feel comfortable about giving honest responses. █████ noted that if you want to follow up people must feel really safe when giving information.

████ noted the need to be clear to include attitudes early on – if someone is not a gambler then need a hook to engage them. █████ offered ABSG as a sounding board for text.

████ advised their study is presented as being on gambling and health. So important to decide what the name is and ensure that is clear and known in the field. █████ advised that NatCen have an internal ethics board and the survey will be covered by this. Large agencies have their own boards but often team up with universities to cover ethics review.

████ asked on factor analysis if the challenge was how long the survey – the questions feel like a slightly disparate list at the moment, and █████ noted that the same feedback has been received from █████ Trying to ensure that we have a full spread means that there is a mix of different types so will be looking at more consistent wording across the statements.

████ joined the meeting and noted that the credit card evaluation was a very clear and concise review of the project. The work was accessible and very easy to read.

████ explained that there is an ambition to reach 10000 with the new survey and how to engage people. █████ explained that there is a £10 completion incentive in vouchers. █████ warned that an incentive based survey could be used by criminals to obtain personal information. █████ explained that the process would be similar to the census and council tax process. █████ noted that 11 years ago they sent out a survey which gave an incentive whether people responded or not. █████ advised that the survey would be sent to random address via Royal Mail. █████ suggested that the danger is not that people will put in false details but it is more that people will pick it up and try to use it – can include anti scams messaging in the language. Links will only be provided by letter.

████ asked what else would be useful for the Research and stats team.

████ noted access to perspectives, advice, and access to networks is really helpful, and having the chance to chat today has been useful. Will have a think on any specific asks.

████ asked that the research team keep in touch and don't hesitate to bounce ideas off ABSG as needed. You don't need to take ABSG advice but the Board would like to know what the next stage is. █████ noted that linking the message as about prevention and a call to action can be a good incentive for people to get engaged and respond.

████ advised that the team will keep in touch and will share their forward planning.

ABSG Meeting 18 November 2021

In attendance: Anna van der Gaag, Philip Newall, Hermine Graham, Shane Carmichael, Ulla Romild, Jane West, Cath Cooney, Tim Livesley, Andrew Rhodes, Joanne Higgs, Tim Miller, [REDACTED], Zoe Osborne (notes)

No new declarations of interest were declared.

[REDACTED].

[REDACTED] explained that ABSG had a discussion over the meal last night, with a briefing from [REDACTED] on the changes at the Commission and how that may impact on the work of ABSG.

The minutes of the meeting held in September 2021 were reviewed and agreed.

For today, the Board are keen to meet Andrew and to hear his views on the key changes for the Commission – there is a new Chair and a new CEO as well as the Gambling Act Review and where the Commission is at. There is a strategic or existential question about the ask from and the offer to the Commission from ABSG, in addition to the operational work that ABSG has been involved in trying to articulate what it is that the gambling act review needs to do. On that point, [REDACTED] is unsure that the advice says enough about futureproofing and the need for the Commission to build internal capability to explore new developments.

Microsoft are banning gambling ads which feels like another significant player leading change, and would be worth making reference to that. The plan is to get the advice finished by the end of the month in terms of formatting and proofing so that we are ready. However, the timescale from DCMS has been adjusted since the change of ministerial team – the publication of advice will likely be in the New Year.

[REDACTED] explained that the key question is how ABSG defines itself in the new world where the direction of travel is much more focused on the regulatory elements of gambling activity and less on the strategy. On treatment and support there is a big question as to whether the Commission wants to stay as a leader in that space. The sense from most of the Board was that the way this is framed is really important – it is not about the Commission wanting to get out of responsibility but looking at what is the next best step for funding and access to treatment and support so that it is placed on a statutory footing. The big question is who will be responsible for leading that – what is the Commission's role and what is the ABSG role in that?

[REDACTED] noted that the ABSG work over the last 9 months has been more about the GAR advice than the National Strategy. The Strategy has never been the only way that ABSG's role has been defined. [REDACTED] noted the strategy has been a vehicle but it is not the only option.

[REDACTED] noted that they had discussed looking at models from other countries and other areas of work. [REDACTED] asked if there were any lessons from elsewhere about how the regulator engages.

[REDACTED] explained that the Australian situation is different, and land based is a bigger issue at the moment. All the states do things differently but all are moving towards tracking expenditure, using cards, and a government led single customer view mechanism.

[REDACTED] spoke from his experiences around health regulation and the notion of the duty of care and ensuring that services are available for those who are in difficulty. Through a pure

regulatory lens the idea is about helping people not get into difficulty and in prevention – that someone should not get into difficulty. The prevention of harm is a soft power exercise.

█ talked about what the Commission should be responsible, including the evaluation of regulation. The question is about what ABSG want to bring to the Commission's attention. In redesigning and reconfiguring regulation here we should be looking at what works well and what we can learn from other people. █ noted that it could be 5 years before we get a new Act and there are other tools in the UK legislative framework that we could use.

█ advised that the Commission is trying to make progress on SCV and affordability in areas where it would be really helpful to have legislative backing and cover. On SCV, there are civil liberties concerns about data sharing – this is why the ICO has permitted sandbox testing and has judged it to be a legitimate test. Issues of consent and opting in.

█ noted that the operator issues might be a concern. Bradford have linked the data for health and social care and people consent to that. █ noted that ABSG might be well placed on the back of the sprints to suggest how the Commission might use its resources in a smart way to prevent harm. In thinking beyond whatever comes after the National Strategy, what is the legacy of the work that the Commission might transition from. █ suggested that legacy is not the right wording – sustainability might be a better phrase. Need to think about what can be done without legislation. █ noted need to understand the mechanisms to move to the next stage – for example to steward the work on and sign it over to someone else.

█ noted the need to be writing at this level for the progress report year 3. █ agreed the need to consider the higher level actions and mechanisms rather than getting into the detail. █ noted that he has been reflecting on how to make best use of the time with Andrew and suggested that the best approach is to have an open conversation about where the Commission is and how ABSG can offer advice to help the Commission to navigate the consequences. There is not much discussion to be had about the general direction. █ was keen to understand the rationale for the direction of travel. █ noted that there was a question about ABSG being different to all the other voices that are critical of the Commission – it is not about just acceptance but it is about how the conversation is approached and recognising that advice is here to help the Commission move forward.

█ noted that for her the GambleAware situation is a really big challenge. The Commission is slightly hands off, but her feeling is unless the situation is addressed then ABSG are skirting around uncomfortable truths on treatment and support. Her sense is that the Commission is distancing itself because it is a toxic area.

█ explained that the strongest lever for the Commission is getting regulation right and ensuring that operators are complying. That is where we can have the biggest impact and that is what we are most directly responsible for. When we don't have enough resource to do lots of work, how much resource we put into ensuring GambleAware is spending its money wisely is limited.

█ suggested that the RET list should be held by a statutory body and they would decide who is best placed to deliver services. █ noted that the provider collaboratives in the ICS system co-ordinate services for specific areas. This is a model which could work. This is what has been set out in the Levy advice. █ suggested that GambleAware have been allowed to grow and become a strong lobbying body – they are enabled to take on this space so if the Commission no longer held the lists and passed those on it would become more straightforward.

The role that the Commission can realistically play – there has been zero willingness to engage statutory bodies over the three years of the National Strategy. [REDACTED] suggested that [REDACTED] who is leading the work is very interested. A conversation between [REDACTED] and Andrew might help to push that along. They have been carrying on without the Commission being involved because they think the Commission is not interested.

As a regulator in a continuum from illegal to harmful, then sorting out GambleAware is probably not a priority. The Commission can offer advice, but they cannot force anyone to sort out GambleAware. [REDACTED] asked if the Commission has a role in the decision for monies to go to GambleAware and nowhere else. [REDACTED] explained that the Act sets out a voluntary system. Until the legislation changes, the operator decides where the money goes.

[REDACTED] asked about the criteria for accessing the RET list.

Andrew Rhodes, Interim CEO

[REDACTED] welcomed Andrew to the meeting and introduced the ABSG members. [REDACTED] explained that the Board are keen that Andrew gets the best out of ABSG and to consider what needs to change and how the relationship will develop.

[REDACTED] explained that the Board have been heavily involved in the GAR advice, have a responsibility to report on the National Strategy, and have increasingly been having more informal interactions with Commission staff. The Board want to work and make a difference rather than to opine. ABSG want to be involved early on and engage rather than to come in at the end.

Andrew introduced himself and explained his background. [REDACTED]

Where the Commission is now, we are seeing the gambification of entertainment – there are increasingly new and novel products which don't feel like gambling, and it is pioneer territory. It is less and less clear what people are engaged with. There is a worry about a watering down of what gambling is and making it easier for people to access. He is in the upstream of prevention; the industry itself is not massively compliant. In food standards the reputational risks, standards and penalties were sufficient to ensure that that bigger operators held the line. In gambling, price is king and people's perception of risk is different. The non-compliance is concerning – as a comparator it's like rats being commonplace. There is an irrational argument coming down from operators, What the Commission needs to do is to use the tools at our disposal. The Commission has had quite a bruising time – we need to bring some things into sharp focus and make it understandable and accessible.

Andrew has dabbled with ideas around rating schemes, [REDACTED] [REDACTED] It was simple and clear and allowed people to make a choice. He has recently asked the team to generate a fact pack with 5 key issues to talk about with the Secretary of State – one was that the gambling industry takes £450 a second from people in the UK. When you start to talk about these issues we can start talking about specific issues and problems – we need to get to a way to communicate in a simple, easily shareable form which someone else does not take and change the meaning.

In the FSA, one of the big parts of credibility was advisory groups – with advice that was commissioned early on and that was made to be accessible. In terms of financial pressures the industry is 800 times the size of the Commission, and mainly not that bothered about compliance. We need to highlight that and holding the industry to account. We need to take more enforcement action. There is an interesting new mix on the ministerial side – [REDACTED] is the lead and the secretary of state is much more on the sceptical of the industry side. The GAR has moved back – unlikely to see a white paper until March and will be interesting to see how hard people want to push. Marcus is keen to ensure that we have asked for everything that we want.

Andrew's ask is help us to make the details easy and accessible. He is keen to engage earlier. The Commission needs to be able to communicate more and contest that space which the industry is taking up.

[REDACTED] advised that ABSG has been talking about accessibility for some time – [REDACTED] work on warning labels and explaining to players what they are getting into could be really useful. In terms of knowledge translation from the evidence ABSG can provide the rigour – but more most people they can provide the one or two lines which explain what it is that the research says. [REDACTED] noted that is a strength of public health where communication needs to be clear. [REDACTED] noted a recent speech at COP about culture change and values and behaviour, and that does not seem to apply to industry. Andrew explained that in his view gambling is a very long way behind other industries but it is relative to themselves, not other sectors. Some operators are proactive and take it seriously even if it because they don't want the hassle – they are others which are less so. The gambling industry is often a loose conglomeration of brands – they get fined and they just pay it. Values may be getting there, but not so much in behaviours. When they talk about gambling harms, their interest is in getting money over a long period of time.

Andrew noted that we need to find the thing that hurts – for gambling businesses reputation and customer perception does not have as much impact. [REDACTED] noted a discussion about the binary nature of licensing and the lawyering up – if there is repeated bad behaviour then why not revoke? Andrew noted that we tend to see more licence surrenders rather than revocation. It is quite binary and in the case of multinational businesses it can sometimes be easier to give up a licence for part of the business. One operator in a fringe space has invited us to prosecute them. There is the inequality of arms financially that is a worry but we have started that conversation with government to move towards polluter pays.

[REDACTED] advised that her team focuses on disruption rather than prosecution and asked if there is a disruption strategy. Andrew explained that it is not yet drawn up but there are other options such as restriction of operations and non-binary options. If we saw problems with operators not dealing with issues at certain times or on certain markets then we can impose conditions. Andrew explained the public perception is less effective with the gambling industry. They are very worried with market share. It's hard to counter perceptions as people refuse to be outraged by bookies. The levers are mostly about commercial incentives or disincentives – they don't like losing money.

[REDACTED] spoke about voluntary regulation and charters in a number of sectors. Andrew advised that the BGC have started describing themselves as the standards body for the gambling industry and that is not what they are doing. Andrew and Marcus have been pressing them that if they want to say that then they should make it true. It's a longer term push.

[REDACTED] explained that in Sweden there are two organisations – one focused on standards and ethics and one that is more focused on licensed operators. Andrew advised that the

Commission does communicate with trade bodies which cover a wider range of activities. They are typically advocating for their industry rather than trying to improve.

Earned recognition as a principle is fine but disagree with paid immunity. The gambling industry is below the regulatory standards, and it is too far away for self-regulation.

█ asked about the approach on SCV and working through the BGC initially. Are there some risks of giving that to industry? Andrew agreed that there are risks – the biggest of those being that they will not deliver. The challenge to the BGC is to prove that they can take it seriously. It does have enormous potential to help to prevent harms if it is done right. We can't always have a service approach where we do everything for the industry – it is their job to comply. █ asked if the Commission would signal through advice that SCV could be legislated? In Andrew's view the industry would view doing SCV as a way to avoid doing other things. They are more worried about affordability checks. SCV would be more likely to increase friction and prevent harm in a way that affordability checks might not achieve.

█ welcomed the idea of more sophisticated disruption to drive industry change. He asked about the policy sprints and the choices that Andrew and Marcus are likely to have to make to enable shorter term strategy to work and what do you think is needed from the GAR for the longer term?

Andrew explained that in the short term there will be some stopping and throttling back of work to put resource into key areas. We already making choices on reallocation of resources. In the longer term, our powers are very strong but our problem is the number of people – we want a new funding model based on demand and complexity. Our current model is based on the number of licensees and a fee structure and does not represent the real cost or complexity of regulating the industry. Limits on online stakes, development of an ombudsman, change to the voluntary contribution system, changes in the land based sector, fees and a well resourced regulator, advertising remains an odd policy question as banning advertising for a leisure activity suggests that it is not a leisure activity. It would be popular to do but it's not well driven based on the evidence or the arguments.

ABSG Ways of Working

Paper 3 is a starting point for thinking about some key questions. The Board considered their views on the following questions and █ collated the answers.

What is working? (Innovation)

What is hopeful? (Aspiration)

What is troubling? (Things to let go)

What is missing? (Ideas for action)

█ noted that some of the questions are about ways of working, some are about outputs. One quick win on process might be providing blogs for the Commission on areas of expertise. There is a need to change with the changing leadership. A strength of the Board is the eclectic mix of expertise. In terms of a USP should the focus be on harm reduction? Independent and expert advice on harm reduction – pulling together evidence from a multidisciplinary perspective. █ noted he finds it easy to tell people what LEAP and DAP do. ABSG has usually been defined around the national strategy and the skill set need to review that – now the types of question are changing.

█ – a systemic public health challenge needs a systemic approach. The expertise of ABSG is about the whole systems approach. In the Scottish group their action plan

acknowledges the expert advice given by ABSG – advice being seen as independent and useful is a validation.

█████ noted Andrew's concern about having a single view on an issue. In that sense having a systems focused advisory group is useful. We can help the Commission to throttle back safely without losing impact.

█████ took the view that most of the proposals would be accepted but more reflection would be helpful on the USP point. The scope of ABSG needs to be broadened so this is about the external facing and the comms side. █████ noted that there is a danger that ABSG will develop a USP which does not align with the direction that Andrew and Marcus want to take. █████ expressed a concern about defining based on leadership that changes results in a loss of the ability to provide independent advice. It is important to stay relevant and give clear and usable advice. █████ was clear that this is not about compromising perspectives but it is about adapting.

National Strategy

█████ joined the meeting to talk about the National Strategy and the updates on the details available. █████ noted that there remains questions about the National Strategy beyond the end of year three. Lots of projects that were on hold due to the pandemic are now starting to move on and develop. There are conversations to be had about what support we can continue to provide, what they will look like, and what transition arrangements might be able to be put in to place. One opportunity is to engage other stakeholders in using the action map as that is something we don't yet know.

On October 2021 updates were sought from all the main partners – the version sent out with the papers did not include the GambleAware actions, and we are still receiving details. By the end of next week there should be a quite full response available.

Public Health England evidence review was a significant development – PHE have announced that gambling will be a key priority for the new IHID. There is a new Gambling Policy and Research Unit which has one year of funding to date. Specific to the Commission there are the online changes on game design which are focused on reducing the intensity of games and providing more details to consumers.

Data provided by partners is taken at face value – where there are published documents then we expect links but it is a large volume of information coming in. OHID have not confirmed any detail on giving gambling priority. █████ advised that there will be three key areas and one directorate will focus on addictions.

The Commission's role in supporting the strategy has been set out on the website and team are considering what to say post the end of the strategy. The Commission has published data on RET contributions for the first time. The interim evaluation of the credit card ban was published earlier this month and gives assurance that the action has been effective and has not resulted in unintended consequences.

The Howard League report on state of play has been funded through reg settlements and is starting to get some traction with the Department of Justice.

Another project TalkBanStop layers together self-exclusion and blocking software. The interim evaluation shows that it is helpful and effective. From our perspective some of the things not yet drawn out are that there is still low take-up for software and limited detail on cost benefit. The Commission has previously carried out a consultation on blocking software and did not consider it appropriate to make it an LCCP requirement.

Commitment to include questions on the APMS – last included in 2007. [REDACTED] on the steering group, do not yet have a definite date on the work.

Could do a similar update to the next ABSG meeting. Team are due to update the regulatory settlement page on the website.

Could do some work on prevention and treatment after lunch.

[REDACTED] asked to what extent ABSG want to comment on achievements through the whole strategy in the Year 3 report. Is it an opportunity to reflect back on the highlights and negatives from previous years. [REDACTED] felt that having not come to the end, ABSG should not yet comment.

[REDACTED] noted concern that without knowing the Commission position in relation to the National Strategy then ABSG cannot make a decision on how to frame their report. [REDACTED] noted a further question about how the progress report can be pitched to support transition. [REDACTED] advised that there needs to be a clear understanding of the task at hand.

[REDACTED] noted that many projects have end dates beyond the end of the strategy. [REDACTED] noted the need to be in at the start with OHID and their development. [REDACTED] advised that the Commission is recommending that the work is picked up by the statutory agencies.

[REDACTED] noted that there is much that is unclear internally and subject to conversations to be resolved. [REDACTED] noted that the ABSG response to the policy sprint has advised that the Commission has to have a role in the prevention space – whether that is a strategy or not. It would be counterintuitive for the Commission to say they will have no involvement in a Strategy. [REDACTED] was clear it is not about letting the relationships die away. [REDACTED] countered by saying that there is a lack of GC presence at meetings and when that has been challenged it is always countered by issues around resource and capacity. From the ABSG perspective the Commission must be at the table, and that has not been happening. That would be an important part of the transition to be present.

Year Three Progress Report

Over the lunch session, [REDACTED] [REDACTED] encouraged ABSG to lift their sights in terms of the focus of the progress report. There is an opportunity to point to successes and then looking at areas where there has been clear collaboration and leadership and then focusing on areas where there is a gap. ABSG could use the report to present the opportunities. Gambling is one of the few issues that has united politicians in a very toxic political environment. [REDACTED] advised that there will not be a hard stop to the Strategy at the end of three years. The flexibility is in place due to the forthcoming GAR.

If all goes well this will be the last progress report. The final report will either be a handover or a close down report. Therefore it should draw a line and prepare for what comes next. Celebrate the success of the national strategy as an approach rather than the individual pieces of work. [REDACTED] noted that in his views, DCMS ministers are quite distinct from DCMS officials in their views.

If all goes well this will be the last progress report. The final report will either be a handover or a close down report. Therefore it should draw a line and prepare for what comes next. Celebrate the success of the national strategy as an approach rather than the individual pieces of work. [REDACTED] noted that in his view, DCMS ministers are quite distinct from DCMS officials in their views.

If there is a really clear gap in the provision of treatment that impacts on the Commission's regulatory success then we should be able to challenge that. The Commission has no influence over design of services but having an operational treatment system is within the interests of delivering against the licensing objectives.

Four enablers in the National Strategy are the parts that are most important going forward, as well as unpacking what has worked well and what has not. Collaboration between the regulator and the industry has not worked well and we need to rethink that. [REDACTED] noted that ABSG were concerned about that but felt it would be disingenuous to be critical of the proposal. That is something that could be named.

Format of the report and divide of activity

- [REDACTED] suggested proposed next steps and a summary of what is outstanding in terms of the Strategy
- [REDACTED] – make the report appealing for the next organisation, cross cutting themes. [REDACTED] will pull out points from notes – what has having a strategy helped achieve, the big ticket items. Non voluntary principle, enjoyed the description from [REDACTED] about the value of the work, not an exit strategy but a genuine appealing narrative.
- [REDACTED] suggested convene on prevention and treatment to develop the structure of the report.
- The report examples that were shared were short, concise, not text dense.
- [REDACTED] suggested that this document is more campaign focused – a campaign for the effect that the strategy has had and what it could continue to do.
- [REDACTED] discussed the concept of a tipping point – it is a call to action and an invitation,
- What the strategy represents and what it has enabled. What the strategy has made possible and then what has happened – how it has moved the conversation on? That covers the overarching theme.
- Each of the four enabling groups to be covered by the subgroups
- 12 pages, design input and infographics along with the links to the detail. Remember that much of the detail lives in the Commission Action Map. Produce a lay summary or abstract.

Possible December session for ABSG to start taking a look at the progress report through sub groups.

January meeting could cover some other issues as well as the updates on the NS Action Map. Then move to final draft for completion by the end of March. Keep the audience in mind in writing. Everyone is up for flexibility and a different way of working.

Next Steps

- Photograph and type up flipchart notes
- [REDACTED] to set up a JamBoard link for ABSG
- Look at dates for December

ABSG Meeting 21 January 2021

In attendance: Anna van der Gaag (Chair), Lou Baxter, Shane Carmichael, Cath Cooney, Hermine Graham, Philip Newall, Ulla Romild, Jane West, [REDACTED]

Apologies

None received

Declarations of Interest

No new declarations of interest

Minutes and matters arising from November 2021

The minutes were reviewed and agreed.

Chair's Update

[REDACTED] explained that [REDACTED] will be joining the meeting [REDACTED] asked ABSG members to consider if there was anyone, they thought would be useful to invite to a meeting this year.

[REDACTED] explained that in October 2021 the advisory groups were invited by [REDACTED] to submit some thoughts on direction of travel for the Commission. Since then, the Executive have been working on policy direction. There was a workshop and a Board meeting this week and [REDACTED] has shared her views.

Overall, the sense is that the Commission want to focus on their regulatory remit and do less but do it better. The other area of interest is how impact and outcomes are measured and this is an area where ABSG have already had quite of lot of input. The Commission is looking for more guidance in this area. [REDACTED] advised that what is less clear is in order to balance the upswing in enforcement and compliance activity what are the things that the Commission can let go of. That is implicit in the direction that is being put forward – that has implications for the National Strategy and for the work that ABSG contributes to the Commission.

[REDACTED] noted that [REDACTED] comments were a fair summary. [REDACTED] noted that the other Advisory Group chairs were of the view that there is nothing that the Commission can stop doing. [REDACTED] noted that there is a clear imperative around a treatment strategy owned by the health services rather than the Commission. There is less clarity on how to divide up the prevention and public health elements. The regulator must be involved in those agendas.

[REDACTED] suggested that there is a space around public health campaigns and assurance where the Commission has a real gap in the knowledge and skills needed to drive a multi agency public health approach to reduce harms.

[REDACTED] asked if the Commission is the best place to hold a list which advises the gambling industry where they can send money to fund RET. [REDACTED] noted that the ongoing issue about the levy is live, and clearly linked to this.

[REDACTED] noted that to really deliver a public health approach other agencies need to be involved – but it feels that the Commission is not that well connected to the relevant agencies and is

holding on to everything when there could be opportunities to work with others to deliver a system wide approach. [REDACTED] noted that the advice suggested that new legislation had a framework for interagency cooperation.

[REDACTED] noted that similar discussions happen in Sweden. Treatment is handled in the same way as all other treatments. For prevention, regulators advice but the local and regional agencies deliver. There are forums to bring together relevant agencies. Prevention is the most delicate part but often the most difficult part to get right. The Swedish equivalent of the GC would be involved in discussion prevention but not actively delivering the work. [REDACTED] noted it might be interesting to see more detail about how the Swedish system works – is there evidence that it is working, and it has impact?

Since 2018, many more agencies have moved in the scope of working together – [REDACTED] noted that many agencies in Sweden feel that they own part of this question. There is documentation and reports to Government on the work. Collaboration is easier when everyone is working towards the same goal.

[REDACTED] noted that in the Progress Report the section on collaboration covers that there is no clear co-ordination group for England. The Progress Report is likely to land around the same time as the White Paper so is an opportunity to make the case of what is needed. The Commission does have the links in this space but there is no forum to bring a multi-agency approach and a commitment to decisions and accountability.

[REDACTED] asked about the measurement of the experience of harms through non-compliance by vulnerable people – how would it be measured? [REDACTED] noted concern and that she had commented to the Board that the how will be the issue that makes change. The definition of vulnerability is not helpful. The FCA have a much more helpful statement around the fluctuations around vulnerability. [REDACTED] suggested that we use the term consumers rather than an ill-defined group.

[REDACTED] queried indirect harm, such as the impact of advertisement and the ripple effect of gambling.

[REDACTED] was struck by the absence of public health in the sprint documents, particularly with the Minister framing gambling in this way. Having the systems approach sensibility is key. [REDACTED] asked what it would mean for the industry regulator to put its name to a public health approach. There is a struggle now in moving from where we were with a focus on the National Strategy to where we are now.

[REDACTED] noted that imposing a levy or removing the voluntary system is not something that the Commission can decide to do itself. Our only lever on that is to recommend to government. The sprints are about what we do now and we can't hang everything on it will only be better if we have a levy – they are based on the power and resources that we have now.

[REDACTED] noted on metrics that there is a much stronger plan in place but it links back to working with other agencies – I would expect people to say that they want local government information. The Commission can't do this on its own so must be able to collaborate.

[REDACTED] asked about providers and due diligence. Will the Commission launch a business education campaign? [REDACTED] noted that there was some work that would fall into that space and will come back to the group.

party access to systems, share the information and best practice, and to set the standards that we will enforce against them. Worried that █████ presented the SCV work as a matter of trust – that is not the case. BGC have committed to come up with something that is compliant. A good past example is GamStop. If operators were not fit to meet that requirements they would not be compliant and would face enforcement action. SCV is not about an operator being told to share all their data with all their competitors – that is a complete misrepresentation.

█████ agreed that trust is misleading but asked how explicit the Commission can be. BGC have already appointed a supplier for SCV. █████ advised that a partner has been appointed for product management.

█████ noted concerns about SCV data being managed by people as close to the industry as the BGC. The next steps section should suggest that it is independent of industry or has independent governance or oversight. █████ noted that there are ongoing conversations between the Advisory group Chairs on this and █████ will lead on this.

█████ asked about trust – we can use the report to add things in that would give that trust.

█████ asked about wallets and where the reference was. █████ advised that there is no hard evidence available – wallets were not covered by the Oxford study.

█████ noted they need to include successes in regulatory cooperation. On payphone services, there are no unintended consequences from the credit card ban evidence as yet.

Note to be added on financial services sector to reflect any change since Year 2. █████ noted that MMPHI are continuing to work in this area but no specific outputs. This section refers back to the last 3 years so include on that basis.

█████ advised that his paper on “When the Fun Stops, Stop” is still embargoed – it can be cited but should have a link available by March.

█████ noted that in reporting results should be cautious about treating all evidence as equal when there are varying sources and quality of evidence.

█████ noted that there is some ongoing work on Crypto casinos – that is specifically gambling operators which take money in crypto. Some of the key issues are lack of age verification, cross jurisdictions and access to unregulated markets. Like gambling squared – all the online gambling aspects but with a stake that is itself fluctuating in value. It is a new product which poses unique risks – two of these firms are sponsors of Premier League teams.

█████ suggested including the Muggleton evidence on low level gamblers and prevalence of harm. █████ noted it was discussed in the last report but asked █████ to draft a note.

█████ – would find listing the GambleAware £4m as a success problematic, as well as industry funding charities. Need to find somewhere in the report to make this point but not as a strength. █████ to suggest wording and location.

█████ will discuss at Scotland SIG – Commission is being tasked to produce a public statement on the outcomes of the Glasgow summit. █████ to follow up with █████.

█████ suggested some earlier intervention work around mental health (to preclude suicide prevention) Would be useful to have a prevention outcome.

█ noted on page 34 on banking – the reference to Barclays publishing complaints is not consistent across the financial sector – they are not a good model.

█ noted the need to build in lines on primary prevention. There are some areas where this could overlap with local authorities.

The Executive Summary sets out key areas of progress – █ and █ will look again at headline messages.

█ advised that the plan is to complete the report before the end of March with a view to publish in April 2022. A further draft will be circulated for comments and input over the next week to 10 days, with a focus on short points with source documents that can be linked to.

There is a purpose question about what this report is – a progress report, horizon scanning, literature review, or advice on the GAR or the sprints. Consider why we are saying certain things. Any comments or thoughts on what we could say that is relevant to other areas of work like GAR and sprints are welcome.

ABSG Meeting 23 March 2022

In attendance: Anna van der Gaag (Chair), Lou Baxter, Shane Carmichael, Cath Cooney, Hermine Graham, Philip Newall, Ulla Romild, Jane West, [REDACTED]

Apologies

None received – [REDACTED]

Declarations of Interest

No new declarations of interest.

Minutes and matters arising from January 2022

The minutes were reviewed and agreed.

Chair's Update

The Chair's Update report is included in the papers. [REDACTED] advised that she wanted to talk about the draft blog which she has circulated to members.

[REDACTED] advised that she had attended the Wales Implementation Group and would feed in any points that were relevant to the Progress Report. [REDACTED] has provided an update on the meeting. [REDACTED] noted that the meeting membership has stabilised and there is a forward plan in place.

[REDACTED] explained that the draft blog came about from stakeholder meetings around the progress report, and the issue of funding came up repeatedly. The tensions that we have been aware of for many years are coming to a head, and that motivated [REDACTED] to get some thoughts down on paper. [REDACTED] has also spoke with [REDACTED] and [REDACTED] and caught up with Andrew Rhodes this week. [REDACTED] asked members for their take, and to consider the possibility that the Gambling Act review will not deliver a levy. There is a quite toxic environment around funding, and ABSG need to consider how we might work together constructively if that is the case. Everything that ABSG have said about accountability, transparency, quality assurance and standards needs to continue, and we need to find a way to ensure all parties are on the same page. Should ABSG get involved in this space? [REDACTED] has been invited to the OHID Task and Finish Group, and there are real concerns that people will not engage with GambleAware at all. The NHS Providers do not agree with each other about an approach either.

[REDACTED] noted that there is a systemic issue and a risk of getting drawn into the dynamics of the relationship. ABSG should step back and see the bigger picture, including the external factors which feed that dynamic. The advice that we have given is the position that we should come back to and would caution against getting drawn into the fray and trying to referee the relationship. The funding model could be switched around so that the NHS gets the funds rather than GambleAware.

[REDACTED] asked where the situation is happening – is it in forums connected to the Commission or more widely? [REDACTED] concurred with [REDACTED] view on not getting involved and sticking to our advice whilst considering other options. It might not be possible to change GambleAware from the inside – they will always be controlled to some extent by industry. This is an issue in public health that we see in other sectors – where people will not get around the table and people have very strong views. It would be best to avoid getting into that if it is avoidable.

█ noted that need for ABSG to repeat our consistent position that whether there is a levy or not there needs to be a sustainable approach. Our approach should be focused on setting a tone and being clear on the need for a whole system and engaging across the systems. What is missing is the 'so what?' █ point does go to the heart of it – the ICS in the NHS can act as a convenor to resolve some of these issues. The Commission are not resourced to do this kind of work – if there is no place for the system to come together there is no way to fix it. That's the practical thing that needs to be addressed.

█ noted that the levy would remove the operator influence from the funding. Gambling treatment and prevention in Britain has been seen as something different to other types of treatment and prevention work. Sweden has bi-annual meetings between operators, authorities, and health groups to have regular engagement which helps to solve problems – that takes time to organise.

█ reflected that Andrew Rhodes had noted that things have never been more favourable for a levy than now in terms of stakeholder and Government support. The blocker is the Treasury – there is little that the Commission and ABSG can do to influence that aside from pointing out the cost of gambling harm. There is an opportunity around reg settlements – Andrew was keen to decouple the work that the Commission does around settlements from the distribution of those funds. As an enforcement strategy the Commission wants to move away from settlements, but that is an opportunity to move into that space of distribution which could be less controversial.

█ will rework the blog and will signpost towards that future. █ flagged that in her world, the NHS decision has been really positive received, so would be keen not to alienate them by perpetuating the toxic notion. █ noted that there are two proposals – someone collecting money and funnelling, and the other option is the RET list which the Commission controls. That list could include only accredited and approved providers – that's another option to regulate who is able to receive money.

From chat: █ 1. *Set the agenda by repeating our advice on more structural and transparent funding, Levy or otherwise, as █ suggests (the piece largely does this)* 2. *Push for systematic thinking...there has to be a role for Govt, 3rd sector, community, customers, and industry for any system to work. Even with a Levy we know this to be true* 3. *Set the tone of discourse without having to solve or forment* 4. *How can we then work on alternative funding and distribution (as per █ models and the absence of a system convening role/body/place to bring the actors together and help the whole become more than sum of its parts. I remain convinced that without the latter, all and any funding arrangement will not maximise potential impact*

Progress Report

█ asked ABSG to give their views on the Progress Report. This will be published before the White Paper. █ noted that the Commission has seen some draft content and she understands that █ is generally pleased with what has been shared to date. The timing of the Progress Report is unfortunate in relation to the GAR, but we cannot wait to publish.

█ noted that in the first section the remaining gaps mentions outcome measures and evaluations and asked if it should have in there the understanding of prevalence, especially at local authority level. █ noted that GambleAware have released a new survey showing much higher rates of problem gambling. █ noted that is hard locally to stimulate interest when there is no local information available, especially as compared to alcohol, smoking etc. █ noted signs of progress in the Commission meeting with LAs and there are individual

authorities which are incorporating gambling in local teams. [REDACTED] advised that generally public health teams are engaged, but elected members do not tend to be engaged and that is hard to work with locally. [REDACTED] asked what is a practical thing that we can suggest – there is no budget in the Commission’s work to expand the sample and winning hearts and minds of local authorities is happening at a slow place. [REDACTED] suggested the missing piece is OHID and the local area profiles. There would have to be Commission support to get gambling added to the profiles, and there is potentially an open door with OHID.

[REDACTED] and [REDACTED] attend the OHID working group, and [REDACTED] confirmed that the issue has been raised.

[REDACTED] has seen the new survey and suggested prevalence surveys are the weapon of choice for both sides of the gambling debate. It shows the limitations of the method and the reason why we should be moving on from the method. This survey uses the full 9 item PGSI whereas the Commission uses the 3-item screener. [REDACTED] will look at whether he can access the data from the new survey. [REDACTED] noted that is something that we could give advice on. Can ABSG say something useful about these issues? It is proposed to use the time between the Progress Report and the White Paper to do something useful on data and evidence.

[REDACTED] asked about advice on diversity and equality and whether the information is accessible for everybody.

[REDACTED] asked as this is the last report, should we clear about who we are passing issues onto? [REDACTED] noted that is included in the recommendations. [REDACTED] noted that there was a debate about this in Year 2 around feedback from DCMS about ABSG tasking organisations, so we have not taken this approach this year. The recommendations are clear about where they are directed. [REDACTED] advised that she felt this should be clearer throughout the report.

ABSG reviewed the report page by page:

[REDACTED] noted the [REDACTED] inquest has brought issues to the fore but it is harder to get a sense of what is happening at LA level. The recommendations are a snapshot of critical actions.

[REDACTED] suggested that an option is added to cover if there is not a levy. [REDACTED] noted that the language used refers to a move away from a voluntary system – it is a big piece of work to scope out all the other options that might be an alternative to the levy and would suggest that this is not the place to do that. [REDACTED] stressed that we need to be prepared for there not being a levy and thinking about alternatives, but not here.

Page 4: [REDACTED] proposed removing the right hand column in the table. ABSG agreed to keep the table.

Page 6: On MMHPI, is there any more qualitative data? [REDACTED] suggested that there should be a call to the banks to deliver on offering blocking terms. The financial institution response is inconsistent and dependent on who you bank with – suggest that there should be a minimum standard and sharing of best practice. Incentivise banks to take action? The direction needs to come from government.

Page 7 and 8: Evaluation section is short but reflects a lack of evaluation. [REDACTED] noted that there is no independent process for evaluation – it goes back to the framework of the mainstream funders (NHIR, Research Councils) where that process is in place. Is there something around the opportunities for evaluation and research to fall under that umbrella? [REDACTED] noted that the report is neutral on GREO and that is consistent – creating other resources to support evaluation activity is where she is comfortable. [REDACTED] noted that what is missing is the independence and research management.

Page 8: Are ABSG content with the approach taken to the £4m grant. █████ asked if it would be better to be more specific about the progress needed. █████ noted that the recommendations are about regulatory action and that is clearly directed at the Commission. █████ confirmed that this would be reviewed again.

Page 10: █████ noted the reference to the 8% increase in the use of GamCare. There are a growing number of partners in this space – but it needs appropriate oversight and resource by independent funding. Are the figures used helping the point that is being made? We have not seen an increase in the numbers accessing treatment and the message could be delivered differently. █████ – he felt that some of the debate around treatment has entered a risk that people may not access treatment as headlines suggest that treatment is lacking/and or influenced by industry. The aim was a form of wording which does give some credit to the providers involved currently and acknowledging the third sector involvement. █████ asked what stats we use here which are meaningful and make the point?

█████ suggested replacing with a sentence that says treatment is available to those who need them yet access to these services has not been increasing in line with what we would expect.

ABSG agreed the Progress Report draft, subject to the amendments discussed. A further draft will be circulated to ABSG, with a plan to submit the report to the April Commission Board meeting.

Data and Evidence

█████ explained that she and Ulla have been working on this for a couple of weeks, and █████ has been discussing the issue with █████ This is a very contested area but █████ was very struck by the BGC tweet about the University of Liverpool study. █████ is keen that ABSG say something for people who want to signpost to a more informed view.

█████ began with an explain – last year the result from a prevalence found that 44% of the adult population had gambled in the last year. At the same time a survey from Public Health said 56% and the gambling authority survey said 73%. This is an example that survey results can vary, and this is something that we should think about when we talk about data and evidence. We are moving from prevalence rates into measures for harm, and we are also moving from individual responsibility into operator responsibility.

Longitudinal surveys track changes over time and █████ noted that this indicated it is important to monitor issues in a consistent way to understand the drivers of gambling harm and the impacts that it has. Whenever you provide a number you are seen to have a stronger argument! There is different ways to improve the data – larger samples can just lead to a better estimate of bias, panels can also be biased, operator data is disaggregated so cannot follow a gambler. What it comes down to is to consider different ways to think about what we do.

█████ agreed that ABSG could say something useful on this point – his interest is whether we could go further in talking about the weaponization. There is a focus on the abuses by industry, but it does happen on both sides. In 2018-19 there was an increase in youth prevalence reported but reviewing the data showed a major change in methodology which meant that the figure could not be compared with previous years. █████ agreed that ABSG telling a story about the ways data is used could help. There is a general issue about funding for research and how that is managed in industries where there are certain connections.

█ noted that we want better data and better evidence across the whole spectrum of activity as that could cover a whole range of methods – there is an urgent need for primary research. Caution about the mention of Cochrane – other frameworks have been used in public health. █ agreed that Cochrane is a benchmark, but it is one that is very RCT focused. It might be worth contacting ((who)) to talk about their work researching research. █ suggested that speaking to █ and █ would be helpful, and would also help to understand the Commission stance. The whole issue of evidence is really central so feels like the right thing for ABSG to focus on.

On Forward Plan, the White Paper and the Commission's delivery plan is the next thing we are waiting for – there will be no shortage of topics where work will be taking place, it is just considering timelines and priority around those.

AOB

█ explained that the Commission has been looking at Advisory Groups as part of a Governance Sprint. One of the outcomes around membership of the Advisory Groups was that it is hard to predict what questions will be raised in any given year, making it hard to consider the mix of skills needed. The plan is to combine a core group with people who have deep knowledge on a particular topic. That led to an approach which will reduce the size of Advisory Groups but work more through networks. That means that we will not automatically renew members through two terms.

█ noted that the Commission is going through a period of huge change and the very strong focus on enforcement came across in her conversation with Andrew this week. We are waiting on the White Paper and there remain a number of questions on consumer issues where █ input may be of use.

█ shared her reflections on her time with ABSG and the work that still needs to be done in relation to consumer vulnerability.

ABSG Meeting 18.05.22

In Attendance: Anna van der Gaag (Chair)
Cath Cooney
Jane West
Philip Newall
Ulla Romild
Shane Carmichael

[REDACTED]. She will share here paper with the group.

[REDACTED] is attending a conference tomorrow in Cardiff.

Declarations of Interest

No new declarations of interest

Minutes and Matters Arising

The minutes were agreed. [REDACTED] noted that the two blog pieces are still being worked on. [REDACTED] advised that the Commission is about to start a data sprint so keen to publish the data and evidence blog. On funding, there is some tension around stakeholder relationships and on balance have stuck with the Progress Report going out whilst we are still waiting for the White Paper and any and all public statements may be misconstrued.

Chair's Update

[REDACTED] advised that she had started conversations with different ends of the spectrum [REDACTED]. Some productive conversations talking through the draft and the message that ABSG have tried to land in clarifying what is agreed, what is not agreed and how we might move forward in the absence of a statutory levy. [REDACTED] is meeting with [REDACTED] and [REDACTED] tomorrow. This follows a meeting with [REDACTED] and some of the GA Exec Team about the draft. They were not happy with how they had been presented in the report, reference to the Academic Research Hub (just announced this week at Bristol), QA, outcomes – generally not happy at all, and did not get very far in addressing issues.

The key point for GambleAware is that they maintain that by having industry funding they are not influenced by industry. They make a particular feature of this in relation to the ARH (£4m in funding, separate Governance structure). [REDACTED] agreed that was a fair summary, and noted that in his view, he would not describe it is a confrontational meeting. GA were not telling us anything they have not said before – a continued playing back of their position.

[REDACTED] was unclear whether it is a lack of understanding of the concerns or just a wilful ignorance. [REDACTED] asked for thoughts on how to manage tomorrow's meeting. [REDACTED] noted that in her view GambleAware are aware of concerns, but they have their system. In terms of setting the research agenda, [REDACTED] noted that other organisations might have an independent group with reference to formal guidance, with proposals then filtering up to a more specialised panel who set the final agenda.

[REDACTED] suggested that with the Research Hub, GA are deliberately choosing to not be involved at all by handing over the money. [REDACTED] noted that she found the Research Hub idea really

worrying – there should be an open review process and competition, rather than just handing over the money.

█████ asked █████ for his views, noting that he is not part of the centre. █████ knows the people at Bristol who are running the centre. For him, independent of everything GA say, the general perception has affected the composition of groups putting forward for funding. Only a subset of UK based researchers apply for funding and that may not represent the best of the research available. The Bristol Group are going down the route of other funding sources that may be problematic e.g., YGAM

█████ noted concerns about funding research and getting media coverage. ABSG have been consistent throughout our reports in expressing concerns. It is a perplexing anomaly that treatment services are being funded by voluntary contributions from the industry. The blog names some of these dilemmas and we should not stay silent on this. The providence of the funding cannot be talked away and ABSG must not shift for our perspective. How do we support the research community who do not go towards the funding.

█████ noted that we have been stuck in a loop with GA for some time and they are locked into their position – which is understandable given their investment into the lead commissioner role. If there is a statutory levy, then the concern is that GA will continue to push themselves forward into that role. At some part, should ABSG take a deep dive into if there is not a statutory levy, what role we play in working towards a shift. █████ noted that the Commission may have a role in developing roles with other funders.

█████ noted that in the research community there is increasing transparency around researchers announcing their funding. It is important to be clear that this is about gambling industry funding going directly into this organisation.

█████ advised that she was clear about the need to stay at the table, be challenging and be respectful. On a positive note, the House of Lords recent debate lasted three hours and Anna noted a shift with much greater clarity about where the government needed to go, a real development of knowledge and commitment to addressing the issue. The Government's response noted that there will be a levy on industry if existing systems fail and this will be addressed in the White Paper. █████ queried what the measure of failure would be. Lord Grade was clear that there is a duty of care to prevent harm.

█████ noted a newspaper article about the lobbying by the BGC to Treasury officials in a push against the statutory levy. That influenced Rishi Sunak to write to DCMS to suggest that the levy be looked at again.

█████ updated ABSG, advising that there are still issues to be resolved in the White Paper, and the ministerial write around is unlikely to be a smooth process. The two issues where we know DCMS are still undecided is on marketing and advertising and on the levy and the Commission does not have a clear line as to where they will land.

The target for the advice after the White Paper will be helping the Commission in respect of its delivery plan. What might come out of that is a question on the levy and how the Commission respond to this. As it stands, we are now in a waiting game.

█████ noted that she was uncomfortable with staying silent where others are speaking out. The Progress report has been sent out to a range of stakeholders, the levy advice still stands, it is about prominence and debate. █████ advised that the Commission is not silent in our relationship with DCMS, we are just not using the media. The general sense is that the BGC approach is overplaying their hand.

[REDACTED]

[REDACTED] asked about OPHID and DHSE. [REDACTED] explained that a task and finish group is looking at treatment pathways and referral routes. The plan is a literature overview and proposals for a pilot to test different methodologies. Following the pilot, the group will review findings. This work links into the NICE guidelines and will feed into that. [REDACTED] has engaged about literature, stakeholders to talk to and potential pilot sites, as well as membership issues. The group has been effectively disbanded as there were people who were not comfortable with GambleAware membership. [REDACTED] is encouraged by the work and the support from OHID.

[REDACTED] has been interviewed by a researcher from Public Health Scotland who is evaluating the whole systems approach in Glasgow.

[REDACTED] advised that the Wales Implementation Group until after the White Paper. [REDACTED] confirmed that the same is the case for the Scotland Group.

[REDACTED] noted that the feedback on the Progress Report has generally been very positive, including from the Commission Board. ABSG are now in discussion on what happens next, and what will happen from the end of the Strategy – as it stands, we are now in transition, and it is about how responsibilities are distributed across the system.

Gambling Commission research updates and forward look

[REDACTED] and [REDACTED] [REDACTED] joined the meeting for an early scoping discussion on the 3-year research plan.

[REDACTED] introduced the session by setting the context for the work. He explained that the proposals are a key part of the Commission's Business Plan. Over the last 12 months the team has been focused on four particular areas:

- Gambling Act Review – supporting the business in terms of types of evidence and on evidence assurance processes
- New approach to measuring participation and prevalence, including building a framework for measuring harm
- Filling the evidence gaps and build understanding of consumers – consumer voice work
- Developing systematic rigour to plans for research going forward and to set some horizons internally, making sure that we answer the right questions in the right way.

[REDACTED] noted that the team is trying to stretch in terms of what we look at and how we look at it, as well as ensuring that we do not sit in a gambling research silo. In the areas that we are interested in, we need to be more expansive and build on our networks as well as yours.

The Business Plan the Commission has published provides further context. Strategic goals include a laser focus on the licensing objectives and ensuring that our work sits firmly in our regulatory role. Improving what we do and the data that we work from is a further strategic goal. In the links to the wider Business Plan, evidence is much more writ across the Business Plan and the Commission is looking to make strides in terms of how we harness data. That fits very well into the team and the research plan. There is also significantly more investment planned into this space e.g. doubling the sample size for P&P work and funding to carry on the telephone survey for another year, carrying on the consumer voice work.

Within a three-year plan need to be realistic about what we can do and where contributions from partners will be needed. It is important that our work identifies the sectors, consumers and operators where we need to take action.

The overall aim remains to have an authoritative voice, to be agile, have a breadth of understanding and be focused on work that will help us to take action. We need to clearly evaluate the changes that come from the GAR.

█ talked to the research plan slides covering direction of travel and research vehicles and how those will develop over time with the ambition to have the Gambling Survey for Great Britain (name TBC) as a consolidated approach by 2023/24. The goal is for more robust single sources.

Within the P&P vehicle is work on questions to identify gambling harms which has been developing over the last two years. A version of those questions were in the pilot and are now moving into the experimental phase. What we have done to date is being reviewed externally currently, as well as █ and her team running some data analysis from the pilot. There needs to be an intelligent way to work with that data to set out measurements of harm.

There will be deeper dives to accompany the core data. The Commission is looking at what suppliers can provide to give voice to consumers and help us to understand how consumers interact with gambling. █ noted that this work is in the early stages of procurement and the White Paper will inform prioritisation.

The CYP survey is currently in field following disruptions due to Covid. Cognitive testing has informed changes to the approach to ensure that we are asking CYP about gambling in the right way. There is a gap around 17-year-olds due to the schools based CYP survey and adult surveys picking up at 18 so looking to fill that.

█ and █ noted that there were three key questions for ABSG:

- What are the key things from your wider experience and perspectives that we should be considering when developing the research plan?
- What is happening outside of gambling that we should bring in? (i.e. methodologies, wider thinking)
- Are there any other people or bodies that are doing similar things that we could speak to or learn from?

█ welcomed the report, noting the additional investment as a real positive. The opportunity to review and calibrate surveys will be key. On increased sample surveys, █ noted the need to plan for follow ups, reminders and sub collection from non-respondents. She has noted tendencies to increase the sample size rather than follow up.

Noted the plans for longitudinal follow ups which are really valuable across the time frame. Involving key experts on data collection is a help and hopes that others will be engaged on data analysis. █ noted that from the Swedish perspective, she is the key person to speak to about this type of work.

█ asked to what extent the Commission is trying to replicate the work that has been done in Sweden, and are the team clear about what that achieves? What is the focus for the Commission given the intelligence that could come from other countries? Why do we need this for Britain?

█ explained that we can learn from each other, but we have different cultures and different industries. This plan, combined with work on harm is the right plan. Prevalence studies need to be included but not as the only piece of work. You need to ask questions around gambling – how people think about gambling and how they live the rest of their lives. There is a need to invest and do it properly.

█ noted that the team are really keen to go back and talk to respondents at a later date and takes the point about the sample size. The aim internally was to get a starting point to give the space to explore what the right number will be. The more people we talk to, the more people we are likely to be able to follow up. There is a piece about ensuring that this part of the data is as robust as possible. The baseline needs to be future proofed.

█ noted that in Sweden there are official registers so can oversample at risk young people but thinks the 20k will be sufficient to learn and then adjust.

█ noted that this is really important to get right and noted a comment from the House of Lords debate and the uncertainty around the figures. Everyone can use the numbers they prefer and clearly methodology affects the rates. In the experimental phase, █ suggested a sub sample collected with the old methodology to understand the effect of changing the methodology and to maintain the ability to compare with the past. On youth participation, changes to the methodology and sampling approach meant that it was difficult to tell what element of the change could be attributed to methodology rather than actual change.

█ explained that the pilot report is due out next week with a sample of 1000. There is definitely a useful point on the experimental phase, as well as how the numbers are used. As the Commission we need to do more to be a louder voice about the most robust approach and how we report and push that message, accepting that people will always use the figure that suits them. On reporting, what should we lead with – the problem gambling rate amongst gamblers, or the problem gambling rate at population level?

█ drew out several points from the slides, noting that the official statistics feel different to the research. Some clarity on research would help to be clear whether that is research to support regulation and evaluation or the wider landscape. The official statistics are key and there is more scrutiny of those figures, as in public health environments those figures are often challenged.

When talking about participation and prevalence, in the wider public health world the presentation would be questioned – prevalence of what? There is a question about incidence, reporting the actual numbers, all the details, and the robustness of sample sizes as they are quite small. There has to be a number where people can see that it is representative, and they can have confidence in. In Bradford 30000 children are being asked three gambling questions and that cohort outcome will be valuable.

█ responded and noted that in particular the need for clarity should be addressed. The team have been thinking about the new P&P survey and a different name. Comments on the sorts of numbers we should aim for are useful and realistically we have to consider the budget available.

█ welcomed the points made and noted that within the 3 year plan the point about the challenge from people about survey methodology and the picture of gambling harm needs to be addressed. We know that it is always going to underreport and welcomed █ note that survey work is part of the jigsaw but there is a need to use other sources to show that we are not relying wholly on a problem gambling screen to represent everyone.

█ noted that the Commission could explore aligning with other agencies and bringing in public health experts to add in that perspective. There are likely to be things happening elsewhere that could fill in parts of the jigsaw. █ explained that she is thinking about conveying where the line is in terms of what the Commission can provide. We need to find some way of acknowledging where others could fill gaps or where we are open to new partners. There are routes through reg settlements, other funders and other agencies and we need to consider the wider place that we draw from in setting out our 3-year plan.

█ suggested that there is a public health space that the Commission could move into and connect. In general, public health there is a suspicion about gambling research due to links to industry, so the Commission could reach out in a more transparent and open way and others might follow the lead.

█ asked about the Commission's focus on the regulatory role and how the research plan maps onto the key areas of the regulatory work. █ advised that there is some overlap – there is work on impact metrics which draws on our data and then the team is a natural place to have a role in evaluation of policy which is yet to come. That is something where we have identified we are at a basic level and therefore the evaluation is a goal for the end of the plan

█ noted that there is a need to be smarter internally about evaluation to understand that there are a lot of different ways to do evaluation and we need to be creative about our approaches to ensure that it is baked in up front into projects. There will need to be some budget conversations to achieve this. █ added that the White Paper will inform what goes into the plan. Now is the time to push for evaluations and methods that we can use.

█ noted the need to signal that we are planning to fill, as well as to highlight the gaps where the research councils could start engaging. There are tactical questions about how to encourage other funders to engage in the space.

█ noted that the discussion is timely and agreed with what has been said already. Has the team got the capacity to pivot as needed, with relatively small resource? It would be helpful to fine tune the P&P language. There are existing good relationships through the Implementation groups and strengthening relationships now is the right time, with the GAR coming forward. █ suggested that this should be a more regular agenda item for ABSG.

█ noted that she would send some thoughts on the slides, and endorsed the comments made. The challenge she would make is in relation to the context for the P&P work. The three pillars are part of a bigger research plan and for ABSG, they have talked about the Commission's role in having more of a handle on industry and banking data and mandating the industry to deliver more on data. Some of the partnership working might involve coproducing with the FCA. The context is not just about self-report but other sources of data, the big data, and that needs to be in the research plan.

There is a missing story about knowledge translation in the plan. Bigger projects have a budget for translation, dissemination, and stakeholder engagement. The figure is not just 0.2% - it is the context.

Two further points – co-design and where you are involving people with lived experience in the design and delivery of research, and finally ethics and independent ethics approval. Some regulators have established partnerships with universities or health boards to check that, but those would be elements that █ would like to see in a regulatory research plan. The consideration is those elements that will be scrutinised in the regulatory and research communities when this is made public.

█████ noted that the points were very helpful and will be looking to incorporate links to data and the next stage after Patterns of Play. The goal there is how we get better access to operator data. The points about knowledge translation, co-design and ethics all need to be taken away. We have been thinking about the quality of what we put out and how we put it out and being more on the front foot when others use or misuse our data.

█████ noted that this is the most highly contested evidence base that she has ever worked with the regulator needs to get on the front foot and pre-empt the misinformation from all sides. Being the authoritative voice means having the confidence and the courage to be proactive.

█████ noted that this very much reflects internal conversations about the Commission being the voice of reason and being able to be seen to have a clear view in between two binary views. We think we should be doing that but organisationally its not where we have been before so working on finding the right tone and place. Setting the intention in our plan is important. To █████ point on capacity to pivot, the Business Plan does say that as so much of what we do will be driven by the GAR, it is planned to review the Business Plan again in September and there is an understanding that we need to be flexible.

█████ advised she would welcome engagement on the procurement side and noted concern that the work would go towards a market research provider. She is keen to see an approach which meets the need in a different way and explores more complex intervention methodologies that are being used in health services research to give a deeper level of understanding.

█████ agreed with █████ point, noting that for many years the health aspects of gambling have been underrepresented. █████ noted the comments and that the team are keen to include different perspectives and providers. In procuring for consumer voice, we are being clear that traditional methods have probably taken us to our limits, so methods must be something that takes us further.

█████ noted that quarterly catch ups are now in place with OHID and welcomes any suggestions from ABSG on people and resources to look to.

█████ thanked █████ and █████ for their time and invited them to come back and talk to ABSG.

Metaverse

█████ updated ABSG on an event that he attended this week, which was hosted by the Digital Regulation Cooperation Forum. █████ advised that he was not familiar with the concept of the Metaverse until recently and noted that █████ had highlighted some of the moves amongst the big four tech companies and the amount of money being spent.

The event included stalls with tech demonstrations and █████ noted that the level of technology is very advanced and there are gambling environments already being built into VR environments. An organisation called Arcade has been working with the National Gallery to develop an AR engagement project for children. From their evaluation, it showed that children would get a lot of learning from the project and other users welcomed children engaging in the space in this way. █████ noted that the application could be used in land-based gambling spaces in a very positive way to provide information to players as well as in way to promote services and offers.

Another demonstration was Bodyswaps, with a HR training focus giving an immersive experience on role playing scenarios in a VR headset.

The presentations gave a sense of the future development of the Metaverse from people in the field. For many people this is the next version of the internet and the next iteration of how we experience online content. A VC suggested that this was six years in to a 15-year project. The role of the big four – Google, Apple, Microsoft and Amazon – was really emphasised, they are the ones buying up start ups and disrupting in this space. The scalability of this was interesting – the ambition is to scale down VR headsets. The tech is affordable already (£250 to £300) so will become more accessible. The interoperability of metaverse worlds was discussed – the ‘walled garden’ was a buzz phrase with the idea of more connectedness in the future but the realism that Apple products for example remain walled off from other tech.

Snapchat had a policy person talk about the difference between VR and AR and their view is that AR will give customers most in the long run. AR is in the real space but enhanced with information and the tech is more manageable.

The other issues to think about are that there is never anything brand new coming out of these developments – the issues that might arise are those that we are already aware of, but in a new immersive world they are presented in a different context and need to consider how that changes the game for us and the psychology of this. The remit question also came up – █████ spoke to the BBFC and noted that they are looking at remit. On NFTs as constituted they are not gambling but have highlighted those as an issue. The common issue for regulators is how this challenges our remit and how we interact with other regulators to ensure that consumer protection issues don't get missed. Along with that is the international aspect as we currently regulate on the GB. Some companies are moving away from state boundaries or expressing that as their ambition and that presents a challenge for regulation.

█████ asked if the regulators said anything on initial thoughts on regulation and impact, and was there any discussion of the impact of immersive technology on behaviour? █████ advised that those issues cut across the day. There were a lot of representatives from Government and there was a lot of focus on how GB can be welcoming to tech companies whilst managing consumer protection concerns.

On the behaviour point, █████ noted that Snapchat talked about their demographic, and it is a very early stage in terms of research on how these technologies affect behaviour. Snapchat have a very young consumer base, but their growth is in the 35-50 age group. The Bodyswap HR demonstration was in some ways just a training piece of software which is fairly typical of mandatory training but clearly, they are betting on a more immersive experience bringing greater change. █████ advised that old research shows that where people take on other personas it changes their behaviour so will be interesting to see what happens.

█████ explained that the Commission is keen to be in the best position to be ready to take action and to be aware of the risks. █████ noted that in this space there are greater concerns about being

█████ noted that this work is part of the scanning function and how we are aware of and grounded in the reality of what is going on. We are coming back to the same issues – referenced some of the wider contextual factors and tactics relating to stakeholder capitalism. There are some cautionary principles, and there is a point of risk as well as opportunity.

█████ noted that the Online Safety Bill has used the language of ‘legal but harmful’ which is useful. The research plan needs to make reference to awareness of emerging technologies and gambling like products.

█████ noted that gambling often latches onto new technology before other sectors, and noted it was another emerging area to keep track of.

█████ noted that the collapse of Terra this week had caused a major impact in the cryptocurrency world. █████ suggested we are on route to another crypto bust like in 2017. Bitcoin and Ethereum are more established whereas smaller currencies are much less stable. Some of the bigger currencies will remain as they still have the underlying use case (making it easy to break the law in whatever jurisdiction you are in), but it destroys the wealth of people who own a lot of these assets.

█████ noted that some past trends were underhyped in the past and overhyped in the future. In the short-term bubbles form and burst but does not undermine the long-term trend. █████ noted that often it is not the first mover in a space which is the one that succeeds – e.g., internet search engines before the advent of Google.

Any Other Business

None notified

From the Meeting Chat:

From █████ to Everyone: 09:49 AM

I think that as academics once they go full on with GA/industry related funding you kind of have to stay on that road as the more general funders are going to be more cautious about working with them

From █████ to Everyone: 09:49 AM

yes exactly █████ the University of Sydney group has gone the same way

From █████ to Everyone: 09:53 AM

I think supporting researchers who aren't linked to industry funding could come via the GC developing relationships with the major PH funders (NIHR/RCUK etc)...and that doesn't necessarily require a statutory level - there's an open door e.g. NIHR PHR has a current gambling call out

From █████ to Everyone: 09:53 AM

have to break a few eggs to make an omelette :)

From █████ to Everyone: 10:04 AM

the squeaky wheel gets the oil!!

From █████ to Everyone: 10:53 AM

████████████████████: "official Gambling Commission figures show that problem gambling has fallen to just 0.2% of the adult population, half the rate of the previous year"

From █████ to Everyone: 11:10 AM

improve, but don't lose comparability with the past!

From █████ to Everyone: 11:15 AM

Its really difficult to evaluate policy and impacts locally as reliable metrics are not available at a local level - but really needed here as local policy likely to have sig impact

From [REDACTED] to Everyone: 11:30 AM

Industry data could be really key to strengthening your official stats which would increase robustness etc

Can I also throw in other stakeholders to co-design/co-production (i.e. local gov, mental health services, debt/housing charities)?

From [REDACTED] to Everyone: 11:35 AM

I agree [REDACTED] and those partners are involved in Strategy Implementation Groups - important to not lose the thread on these SIGS.

'Policy is to a large degree shaped by who prevails in framing problems and their solutions. All too often, the choices we make about what we say and how we say it are influenced by and reflect corporate interests. In this way, corporations can define the world of the possible and the impossible, the blameless and the guilty. We need to find better ways to tell the stories that matter, and better

ways to counter the pollution of discourse on health' Maani et al May 2022

From [REDACTED] to Everyone: 11:41 AM

Agree, exploring complex intervention methodologies approach is key - Matter of Focus in Scotland have developed a good approach in that complexity landscape using 'Outnav' - happy to discuss.

From [REDACTED] to Everyone: 11:42 AM

For official stats OHID may be a really useful connection to help provide methods guidance

From [REDACTED] to Everyone: 12:20 PM

Is there learning from the legal but harmful language in the online safety bill

From [REDACTED] to Everyone: 12:21 PM

<https://www.theguardian.com/technology/2022/may/14/can-we-create-a-moral-metaverse>

From [REDACTED] to Everyone: 12:22 PM

yes that was a good piece thanks [REDACTED]

From [REDACTED] to Everyone: 12:25 PM

Thank you for sharing the Guardian article [REDACTED] it does start to highlight potential areas of significant harm

ABSG Notes 26 July 2022

Present: Anna van der Gaag, Hermine Graham, Cath Cooney, Ulla Romild, Philip Newall, [REDACTED]
[REDACTED]

Apologies: [REDACTED]

[REDACTED] welcomed ABSG members to the meeting and advised that [REDACTED] would be joining the meeting today to update on Patterns of Play. [REDACTED] will also talk to the group about his current research work.

There were no new declaration of interest.

The minutes of the last meeting were agreed.

[REDACTED] Chairs update was circulated with the papers for the meeting. [REDACTED] noted the following points:

- The White Paper has been delayed
- [REDACTED] has met with Gambleaware and NHS Treatment providers
- [REDACTED] and [REDACTED] have worked on a draft blog on prevention and would welcome any comments.
- [REDACTED] has been working with [REDACTED] to look at the Open Safely project in Oxford. The project gained prominence in the early part of the pandemic as they developed technology which could lock on to and extract data from NHS records.
- BBC Three documentary released on 18 July featuring [REDACTED] and [REDACTED].
- GamLearn have been involved in developing a film called One Last Spin and [REDACTED] attended the remote launch last week.

[REDACTED] attended the One Last Spin premiere in Scotland, and noted it was part funded by the Alliance. [REDACTED] noted that there was a Radio 4 piece yesterday about Addiction in the Age of the Metaverse: [BBC Radio 4 - Analysis, Addiction in the age of the metaverse](#)

[REDACTED] met with [REDACTED] Excellent meeting, and [REDACTED] had circulated the letter from the Scottish Public Health Minister to [REDACTED]. [REDACTED] suggested that the statement from [REDACTED] about the future of the National Strategy work needs to be set out in a much more public way. The delay in the White Paper has had a huge impact on planning.

[REDACTED] advised that the last two meetings and the next one of the Welsh group have been cancelled.

[REDACTED] asked where the Commission are at and where we feel that the new Minister and the PM candidates are at. He noted comments from [REDACTED] and [REDACTED]. [REDACTED] also noted that [REDACTED] is looking at Duty of Care and asked if there was more detail.

[REDACTED] explained that she understood that [REDACTED] was just agreeing with the ABSG position on duty of care.

[REDACTED] explained that recess started last week, and our understanding is now that it will not be published until after recess. We know that there will be a new PM, a new cabinet and anything else is speculation. Even in the best case scenario it seems unlikely that the

effect – that is people tended to gamble more. The first reporting of the study made much of the fact that the initial message highlighted Fun over the Stop. The Industry responded by changing the presentation of the message. The latest response has been to adopt a new message – the first one not to mention the word fun. However it still maintains a personal responsibility narrative and the advice is vague.

█████ explained the aims of the study and the improvements made for this study. The second study additionally covered speed of play, rates of help seeking, and the number of bets made.

The outcomes cover:

- Proportion of available funds bet (Initial stake plus all the winnings) Varies from 0 for those who bet nothing to 1 for those who bet and lost everything
- Speed of play
- Total number of spins
- Clicks to additional help

Results

There was a 2% reduction in proportion bet between control condition and message conditions, but effect does not reach threshold for statistical reliability.

Speed of play is slightly slower in the message plus condition. It is not enough to be a statistically reliable finding.

Total number of spins is slightly lower in message condition only but not a credible effect.

The probability of GamCare click was around a 3% base rate which affects the ability to detect reliable difference.

The summary is that there were no credible effects found to conclude that Take Time to Think has an impact. There is a consistent effect of a 2% reduction in proportion bet, but the other outcomes were not demonstrating consistent effects. Whilst largely ineffective, there is not a backfire effect with the new message. Further improvements could help.

A previous study manipulating speed of play did find credible effects on proportion bet and total number of spins. Further changes to game design have much more potential to see meaningful differences in behaviour.

█████ asked about the message plus condition – does a whole screen message reduce the speed, and was that controlled for? █████ explained that the time on speed of play does not start until the first spin.

█████ noted that the industry has tended to use strategic flexibility to make interventions ineffective – for example deposit limit options where people set huge deposit limits rather than a realistic approach. RTP information is not shown in helpful ways.

█████ asked there had been any response from GambleAware to the findings. Messaging in this space does not help.

█████ asked about the sample and whether it was categorised? █████ advised the main criteria was online gamblers and a complete PGSI was completed. There was a full range of PGSI scores but broadly representative of online roulette gamblers. None of the effects were different based on different PGSI scores.

█████ joined the meeting to present an update on the Patterns of Play research.

█████ reminded ABSG of the background of the project, noting the steady shift of gambling activity to the online space. This has been slower than in some other sectors, but it moved steadily and pre COVID 56% of all non Lottery gambling was carried out online.

█████ talked through his presentation on the research. NatCen produced a follow up survey. NatCen were very good to work with. GambleAware relationships were more challenging. The Commission was represented on an advisory board but GambleAware refused to allow a meeting. GambleAware were overly engaged in editing the initial interim report but things did improve from January 2022 with the appointment of a new Research Director.

Technical report two covers the recommendations and █████ noted:

- Online gaming is a far bigger industry than online gambling and the policy focus needs to move away from sports betting.

Three possible projects to make use of the data sets which are beyond the scope of the Commission:

- █████ noted that the data is set to be destroyed at the end of the year
- 5 of the 7 operators will not give permission for any further research with this data
- Night Time Play
- In Play Betting and Micro Betting
- Operator Interventions

█████ asked if the Commission could be more specific about the markers of harm. There is research on patterns which predict harm and these should be included in the operators algorithms. █████ suggested that threshold-based systems might be just as effective as algorithm based systems.

From █████ to Everyone: 01:43 PM

<https://www.bbc.co.uk/programmes/m0019k3x> Link to programme

From █████ to Everyone: 01:51 PM

<https://consult.gov.scot/mental-health-unit/mental-health-and-wellbeing-strategy/>

<https://www.gov.scot/publications/consultation-new-suicide-prevention-strategy-action-plan-scotland/>

From █████ to Everyone: 02:08 PM

Brilliant!

From █████ to Everyone: 02:10 PM

<https://www.apbgg.org/previous-meetings>

From █████ to Everyone: 02:14 PM

The GC have had some engagement with this APPG before as they investigated us.

From █████ to Everyone: 02:22 PM

<https://www.bbc.co.uk/news/science-environment-62225696>

From █████ to Everyone: 02:24 PM

[REDACTED]

From [REDACTED] to Everyone: 02:54 PM

I need to take a short break

From [REDACTED] to Everyone: 03:31 PM

take time to think

From [REDACTED] to Everyone: 03:42 PM

sorry, need to pop my camera off a few mins. Listening with enormous interest. Cross-selling products to existing customers is a proven and lucrative marketing route in other sectors e.g.

[REDACTED]

From [REDACTED] to Everyone: 03:53 PM

these findings are particularly relevant to GC's next steps perhaps on its consultations

From [REDACTED] to Everyone: 03:55 PM

Thank you [REDACTED] finding your presentation and analysis today hugely insightful - much in tune with ABSG recommendations and advice to GC, which is encouraging. I must sign out now [REDACTED]). Hoping we can continue this thread (implications and learning from [REDACTED] and [REDACTED] research findings) at next ABSG Board meeting.

From [REDACTED] to Everyone: 03:59 PM

thanks [REDACTED]

From [REDACTED] to Everyone: 04:08 PM

[REDACTED] - the last slide is a perfect example of Sparrow's 'characteristics of harm' model of regulation. The industry clearly already has the data to understand the characteristics of micro-betting harm and therefore act upon it shld they wish to do so. A vital secondary outcome of this research by [REDACTED] and [REDACTED] is to confirm how much is already/could be known and therefore what is possible...

From [REDACTED] to Everyone: 04:09 PM

Here is a RCT from Norway on this intervention suggesting a causal effect
<https://onlinelibrary.wiley.com/doi/full/10.1111/add.14982>

From [REDACTED] to Everyone: 04:10 PM

Thanks [REDACTED] V interesting. Shame [REDACTED] isn't here to discuss a group of Swedes (and one Canadians) researching the Norwegians!

ABSG Informal Notes 16.11.22

In attendance: Anna van der Gaag, Cath Cooney, Hermine Graham, Jane West, Philip Newall, Ulla Romild, [REDACTED]

Apologies

None received

Declarations of Interest

No new declarations of interest

Minutes of the previous meeting

Agreed

Chair's Update

[REDACTED] asked [REDACTED] to update on the Glasgow whole systems work and noted that [REDACTED] and [REDACTED] have a planned meeting with UKRC in January 2023.

[REDACTED] attended the European Public Health Gambling network to present on prevalence studies and how no change can be reported. The key message is that what we are trying to monitor gambling prevalence at population level, the prevalence is one measure but harms need to be considered as well – don't relax if prevalence is steady as harms are still occurring. Seminars are run once or twice a year and [REDACTED] would recommend them.

[REDACTED] advised that the Glasgow project had asked [REDACTED] to facilitate a session with their multi agency group focused on action planning. [REDACTED] impressions was that people would welcome some steer from the implementation group but not ownership. Partners had a greater sense of agency and there was a commitment to keeping the issue live. A report went to the multi agency group yesterday. [REDACTED] spoke to [REDACTED] and noted that [REDACTED] has been in touch with the group and there is a desire to continue involvement in ad hoc meetings.

[REDACTED] reflected on a conversation with [REDACTED] in Greater Manchester and noted that they have applied for another regulatory settlement. ABSG need to stay connected to what is going on even though the group will now be focused on the regulation and the licensing objectives.

ABSG queried the decision-making process on regulatory settlements and noted the advice available on the Commission website.

[Regulatory settlements applied for socially responsible purposes - Gambling Commission](#)

[Meetings and decision-making - Gambling Commission](#)

[REDACTED] noted that LEAP met with the new minister yesterday and it has been suggested that the White Paper may be published before Christmas. [REDACTED] noted that [REDACTED] had led the session with the group and it was a well organised session on the part of LEAP.

[REDACTED] noted [REDACTED] blog and asked if members had had a chance to read it. [REDACTED] welcomed the reference to epidemiology and the need for a timeline of data.

Gambling Commission Three Year Evidence Strategy

Members of DAP, LEAP and the Commission Research and Statistics Team joined for the item. [REDACTED] asked everyone to introduce themselves.

The advisory groups have come together to discuss research questions and their input into the three-year strategy.

[REDACTED] presented on Evidence gaps and priorities. [REDACTED] advised that in April 2023 the Commission intends to publish a research strategy with a three-year horizon to inform regulation. Post the Gambling Act Review, the team are keen to refocus – to fill gaps and to consider how we gather and use evidence. The conversation today is less about method and resource, more about questions. Slide 6 outlines what we want to know. The outcome is a published document, consistent with the licensing objectives and embedded into our business planning process.

[REDACTED] outlined the work undertaken over the last 12 months, including reviewing the GAR advice, internal workshops and mapping the evidence ecosystem. This approach is focused on getting a breadth of opinion.

[REDACTED] proposed theming the discussion around three areas – people, products and practices. [REDACTED] advised that the group should be focusing on the important questions that the Commission should be asking, and where the information might sit. At the end of the session, each of the group will be asked to identify their top three priorities.

People	Where does the information sit/what other details are available/notes from chat
Psychological and financial dimension – predictive algorithms aimed at interesting with the risk of gambling harm mean needing to accept that harm has multiple elements. Some factors may moderate the risk of harm, what leads or contributes to harm beyond gambling behaviour.	
Are there ways to better collect data to assess data on psychological indicators?	Health and wellbeing work – looking at change over time
Who is experiencing harm – including those affected others. Need to achieve consensus about what the policy problem is before collecting data – who has a voice in defining the problem?	
Marginalised groups – many groups do not have a voice in research. Could there be more done to look at how women are affected both as gamblers and affected others.	New survey will cover affected others
Gambling harm as a continuum – there is a spectrum of impact	Language and defining key terms is really important especially when they're very broad e.g. how is vulnerable defined - and whilst there may be a formal definition for some

	<p>terms they will mean something different to different stakeholders, operators and the public e.g. 'fair and open' 'harm' etc - that takes some groundwork but being clear on this at the outset avoids problems down the line</p>
<p>Starts with working out who – in public health research questions would be set in different ways – reporting, reliable epidemiology as detail is masked when you group people together, need risk profiles by age, ethnicity, where people live, time trends. Review of existing evidence. Co-production with people with lived experience and other stakeholders to ensure prioritisation is possible and what is financially and politically feasible. Current feels like research questions are developed first.</p>	
<p>Map is missing how the regulator can affect the market. Cannot see clearly what are the gambling opportunities.</p>	
<p>Local routine data and what works. From the Commission perspective, how can the Commission gain access to operator data and other data sources (in collaboration with the FCA and banks). Much of the current data is self reported – how can we go in a different direction and demand more of operators in terms of anonymised data?</p>	<p>Commission needs to make technical investment in accessing anonymised data. DAP has been looking at approaches to bridge this gap. Opportunity to force the industry to self report?</p>
<p>Where do people gamble and when (e.g. sporting events, times of day away from family, when paid ...)</p>	
<p>Access to operator data – especially whether interventions are really changing behaviours? Where there are breaches can assess whether interventions made a difference. Safer Gambling tools – research question around comprehension of messages and how uses interact with them when they are going to gamble.</p>	<p>██████ work on understanding of messaging</p> <p>Would be great to have operator data but agree no single source is enough -I would support multiple sources so having routine annually reported data (PHOF) can help verify as well as offering the opportunity to link to other PH indicators (homelessness, suicide, first entry to the justice system, crime/domestic abuse etc) and to the NHS (access to treatment</p>

	pathways), and importantly offers transparency
Have to regulate for the contribution of data into a single customer view – has to be mandatory. The voluntariness of some safer gambling tools – there are system led tools that can be used but that will rely on a data feed and a real time data pool.	Noted this was the original vision for single customer view
Industry data is not a silver bullet – it will be hugely complex and could take several years. The regulator sets a framework for self report – in financial services, the regulator initially gave the industry a lot of leeway. What happened through disclosure was the regulator could see what was and was not reducing risk – visibility of internal practices enabled stricter regulation.	
Bank data is not reliable – one bank contributed to research and has advised that they see no commercial value in continuing	
Are we finding out from younger people how they have managed to avoid verification measures in online gambling? How does age verification vary across online providers – can the Commission regulate a mandatory minimum standard?	
Who gets to frame research – where does the Commission put its resources? What is the role of the Commission in this- standard setting, compliance, enforcement, protection, official statistics, who is harmed and who do we stop it happening.	<p>Policy is to a large degree shaped by who prevails in framing problems and their solutions. All too often, the choices we make about what we say and how we say it are influenced by and reflect corporate interests. In this way, corporations can define the world of the possible and the impossible, the blameless and the guilty.</p> <p>We need to find better ways to tell the stories that matter, and better ways to counter the pollution of discourse on health' Maani et al May 2022</p> <p>Huge untapped source of data from third sector orgs and individuals - what is the actual definition of the</p>

	policy problem, what is the hegemony
--	--------------------------------------

Products	Where does the information sit/ what other details are available/notes from chat
Mandatory gambling card – in venue gambling in Australia. Can prevent children being able to gamble and can build in mandatory self exclusions through the card. The card has pre-commitment limits and maximum spend amounts. A universal public health intervention – centralised and automatic rather than relying on operator data to direct.	Premier of Tasmania - Nation-leading card-based gaming with pre-commitment a first in Tasmania
Land based gambling and cash in hand gambling a refuge for those excluded (by whatever means) from online gambling	
Product and promotion could stretch to certain links to contextual setting (like 'football', 'entertainment media')	

Practices	Where does the information sit/ what other details are available/notes from chat
Creation of stigma and the impact of the responsible gambling model and individual focus – what impact that has on gamblers	May cross over into people – need to make better use of the studies which have already focused on people GambleAware are doing some work on stigma
Promotion and marketing practices – operation and automation. Business use data to inform this and it is a massive set of nudges that needs to be turned off automatically in certain circumstances	I like the 'call' point - I see a future where operators automatically 'block' certain digital marketing / promotion (like free credits / plays) based on algorithms, then follow up in a controlled process in case of 'false positives' - catching non harmful situations
New Swedish Gambling Act 2019 obliges operators to report to the gambling regulator – number of active accounts, amount spent and actions taken according to the duty of care within the Gambling Act. When are operators supposed to act and what should those actions be? Kindred are holding a seminar this week on these issues. All operators need to have clear definitions on what to report.	

Mandatory duty of care for gambling operators and financial services as a whole population intervention.

Priorities	
■	<ul style="list-style-type: none"> • Hierarchy of evidence – what should and should not be considered, evaluation frameworks • Regulator thematic reviews – concept from financial services • Product risk – much more robust approach to working with industry needed
■	<ul style="list-style-type: none"> • Who is affected by gambling harms? • What is the continuum of gambling harm? • What the wider population define as gambling harm? Is there an understanding of it at all
■	<ul style="list-style-type: none"> • Products – need to understand the harmful elements of products. • AI to identify harmful gambling • Understand the impact of the responsible gambling model – contributes to stigma and underpins the attitude to gambling and people who develop addiction
■	<ul style="list-style-type: none"> • Understanding product attributes and promotional practices that most impact potential gambling harm and considering regulating changes directly • Drive better data from operators – to automate prevention of harm and facilitate research • Types and categories of harm to target – to understand that requires richer data and not yet in good shape to use AI or machine learning
■	<ul style="list-style-type: none"> • Having a research framework and model that drives the focus of research and priorities • Product risk and characteristics – design features which increase addictive patterns • Effectiveness of operator interventions and whether they change behaviour
■	<ul style="list-style-type: none"> • People experiencing harm • Understanding of gambling products and the types of products that we can accept in the market • Duty of care – ability to rapidly detect issues
■	<ul style="list-style-type: none"> • Products – research on high-speed gambling products and high level losses Reduce the speed and ease of online gambling in order to prevent harm - Newall - Addiction - Wiley Online Library. The idea can be developed into in play betting. Australia policy focused on reducing harm by creating friction – have to carry out in play betting by phone
■	<ul style="list-style-type: none"> • Move to compel industry data as a regulator, alongside regular reporting • Women and gambling

	<ul style="list-style-type: none"> • People and places – co-morbidity and the notion of vulnerability
■	<ul style="list-style-type: none"> • Co-morbidity • Language and different meanings in different spaces • Young people
■	<ul style="list-style-type: none"> • Can the Commission monitor those at higher risk of harm across online operators? • Can we analyse and publish thematic review of breaches relating to marketing to children? • Can we review regulatory breaches and publish analyses of customer behaviour?

ABSG – Forward Plan and January Workshop preparation

ABSG reflected on the previous session and discussed the hierarchy of evidence and how this can apply to the Commission. For the Commission, need to understand what evidence and research is for. Some of the work is about signalling to others in the external environment, not just doing the research.

ABSG considered what we can get access to and what can be mandated through regulatory powers. There are potential licence conditions available around ad hoc data requests that could be used. ABSG would like to see the Research team to return with a framework, detail on resources and methodology and to consider how that fits into regulatory settlements.

■ noted that data requests have to be considered carefully to understand what infrastructure is needed to collect and collate and use data. There is a resourcing challenge.

On next steps, ■ noted that ABSG have a workshop with Commission staff planned for January 2023, looking at the terms of reference with a view to refreshing the flow of requests for advice from across the Commission. ■ intends to use the workshop to bring on stream some new questions from other parts of the Commission.

Dates have been circulated for meetings for ABSG for 2023. The invite for the 31 January workshop is to be shared with all members of ABSG.

Action: Possible in person meeting dates for February 2023 to be considered.
Potential for a short meeting in January 2023 if the White Paper is published.

■ noted that a key question for the Commission is getting the Evidence Strategy right. ■ will follow up with ■ and the team to discuss next steps. ■ noted that the in her view the research and evaluation function is too narrow and it needs to be about the Commission's data and intelligence function as well. ■ asked how ■ team works with different teams across the Commission and how teams are integrated.

■ explained that DAP had been working closely with ■, with a focus on how the Commission can use data to become a better regulator. ■ and there remains a question about how the data focused approach will move forward. Conversations are ongoing about bringing in the right leadership, expertise and support to establish cross Commission activity.

■ noted that there is a need to think about intelligence gathering and research flowing from that. The cross cutting approach needs to see the Commission as a system. ■ talked about a forum for looking at what is coming – horizon scanning and data scraping.

AOB

None notified

Advisory Board for Safer Gambling 23 January 2023

Present: Anna van Der Gaag, Ulla Romild, Cath Cooney, Jane West, Hermine Graham, Philip Newall, [REDACTED]

[REDACTED] opened the meeting and advised that the purpose of the meeting is to discuss the Workshop session planned for the end of the month.

No new declarations of interest

ABSG Updates

[REDACTED]

[REDACTED] asked of the COI policy would impact on lived experience recruitment. [REDACTED] noted that the policy is specific about senior management positions in campaigning organisations; [REDACTED] The policy also looks at parity with the other advisory groups. In terms of the membership we have erred on the side of openness – it is difficult in respect of the Chair position to have someone who takes a strong public stance. So that we hope that it will not have an impact on recruitment, and that there is still a wide cohort.

It is hard to recruit onto a standing panel and get a diverse view of gambling harm. What we have been doing more recently is workshops with people with lived experience. Before Christmas LEAP co-facilitated a session with a group that works with women with experience of gambling harm. We plan to do further sessions with people with lived experience from ethnic minority and cultural backgrounds, and also with people who have experienced illegal gambling. One ask of LEAP is that there are at least one year into recovery. The blended approach will allow for engagement with much more current experience.

[REDACTED] acknowledged the response. [REDACTED] advised that the response had given some assurance and that there are a wealth of people with experience out there. There is a fluidity to working with lived experience, but it would be helpful to stay in touch. [REDACTED] advised that he is meeting [REDACTED] next week and wants to take that message about an ongoing working relationship into that meeting.

[REDACTED] reassured [REDACTED] that engagement with GwL as a stakeholder will continue. Our enforcement team are working with families involved with GwL to develop and improve processes with keeping in touch with families when there is a gambling related suicide.

[REDACTED] noted the OHID update, and that there was no great conflict with the original work. Reference should be made to range of suicides rather than a specific number.

[REDACTED] contacted [REDACTED] and there are now 24 staff in NHS clinics in England and they estimate they will be able to offer 3000 sessions by 2024. That demonstrates the scale of expansion, and work is ongoing with GambleAware on the

integrated pathways. ██████ thanked ABSG for their input on this work and influencing GambleAware's thinking. We are seeing slow progress to objectives set out in the strategy. ██████ and ██████ met with the MRC and a workshop was proposed for academics and funders to identify gaps and available funding. It did not address the issue of them administering a funding programme. ██████ noted that she was interested to know where the £45m in fines had gone – under previous arrangements ABSG would have been involved, and the argument about regulatory settlements funding and the need for the UKRC to be involved stands.

██████ advised that he will follow up with a meeting with ██████ On research priorities, that fits well with work that ██████ and ██████ are doing to flag evidence gaps where others can contribute. There is a difficulty in the Commission contributing to where treatment money is spent but we do not have expertise in the Commission on that. ██████ was disappointed in the focus on evidence gaps – that should be done by a panel of people and through a transparent process. In the MRC they were trying to understand what sort of things they would be funding.

██████ noted that prioritisation should not just be by the Commission – it should engage with local authorities and people working in this space.

- ██████ confirmed that there is no further update on the Gambling Act review.
- On data strategy, ██████ noted that the Commission were doing a lot of work last year with the interim COO. ██████ Work is being picked up with DAP and the Exec Team as part of business planning for next year. ABSG could have some useful contributions to that issue. ██████ asked if there is a process to involve ABSG in discussions – ██████ advised that nothing is in place as yet, but the work is a priority and embedded in the Exec Team. ██████ suggested that ██████ and ██████ could have an initial conversation as the best route in, or invite ██████ to ABSG.
- Spring Conference, 9 March 2023. ██████ will be speaking to ██████ shortly about a panel session on lived experience and ██████ will follow up with ██████ on evaluation. ██████ will follow up with the team on invites.

Workshop Session 31 January 2023

One hour session with Exec Team and senior staff. The agenda is focused on developing ways of working between ABSG and Commission.

██████ noted a discussion on consumer messaging with ██████ ██████ suggested that it would be useful to explore the types of working and ensure that the Commission understands the skills within ABSG and the shift in the terms of reference, as well as to reset a relationship with colleagues to help them to understand where advice will be useful to them in the future.

██████ noted that ABSG need to show where they can add value as that can only happen when opportunities are presented. On Comms, ██████ agreed that the Commission is very good at talking to industry and there is scope to get better with the public and with other organisations – local government, health and public health. ██████ asked where that would add most value for the Commission in engaging with a wider range of stakeholders. ██████ noted the need to keep the networks in Scotland and Wales running. This session is about relationships.

██████████ noted that the Welsh implementation group highlighted where having everyone around the table influenced the Commission's mind in terms of what people on the ground need. There is a place for having a wider range of stakeholders involved.

██████████ advised that he wanted ABSG to think about how engagement with education, treatment, public health etc get translate into advice which helps the Commission with it's primary role, which is regulation. ██████████ suggested that the Commission take action and this work could close the loop. Having those people around the table helps the Commission to understand the implications of changes that have been made, and whether people on the ground are affected by the changes that are made. ██████████ welcomed that view and noted that he has been talking to colleagues about how advisory groups can offer insights which assist the Commission with regulation. It is not about taking ABSG to what we were good at before.

██████████ noted that ██████████ in a speech stated that there had been a 70% drop in VIPs since new regulation and income from higher spending customers has reduced. That is directly related to evidence presented around high risk, high engagement and high spend. The Commission has made changes which are filtering through to revenue streams – it is a good story about the use of evidence and lived experience to shape thinking. ██████████ noted that the Commission does more than just regulate – e.g. to evaluate you have to have stakeholders. The issue around Comms is that many stakeholders understand what the Commission does – it would make a difference if people understood what we do.

There will be a further session with ██████████ to prep for the workshop.

██████████ asked if ██████████ found chairing the Wales implementation group useful in her regulatory role.

██████████ ██████████ messaging from Australia. Would be good to do similar focus groups with people from the GC! <https://psyarxiv.com/48f6t>

ABSG Workshop 31 January 2023

Present: [REDACTED]

Apologies: [REDACTED]

Attendees introduced themselves.

[REDACTED] set out her thoughts on the purpose of the meeting, and welcomed the opportunity to speak with Commission colleagues. She acknowledged that change has occurred in spite of the long wait for the White Paper. The momentum around transparency, driving transparency from operators, publishing more and engaging with the agenda around transparency and standards is key. For ABSG, there is a sense that there is a momentum around the understanding of the differential impacts of online products, and the differential impacts on people. There are particular concerns around the impact on low income families., growing trends around women and gambling, and finally the impacts of practices – particularly those relating to data profiling and direct marketing. ABSG role is to make sense and translate evidence into more accessible formats. The new term of reference recognise the shift away since the end of the National Strategy on reducing gambling harms and the focus on the regulatory toolkit and rising standards. ABSG are keen to see how they can contribute to that remit. In talking to [REDACTED] [REDACTED] and [REDACTED] how ABSG contribute to regulatory function as well as regulatory purpose (influence and support and identifying and enabling responses to future risks as well as current risks)

[REDACTED] asked [REDACTED] to discuss recent engagement through the joint session with LEAP and DAP, how that helped and what could have been done differently.

[REDACTED] explained that R&S is putting together a three year plan and sought advice on what should be included, what was possible, and in doing so set out four questions.

There was a clear task for the session and the team achieved their goals for the session, having got what they needed. Before the session, concerns about the number of people in the session were in a virtual environment but got perspective from everyone and discussion. The breadth of experience and perspective from that group was very useful – there are such a range of perspectives to bring and the session brought different views to the table. What worked well was bringing in members from other expert groups for challenge and discussions. People brought ideas and were open to discussing and building on other people's views. For [REDACTED] he hopes to have the broadest range of perspectives to distill into what will work going forward.

What could have been better – [REDACTED] noted the recognition of time. With less face to face meetings, we try to squeeze in virtual meetings whereas on some issues we need more time to do issues justice.

In terms of impact, the frame of the discussion has set out the draft work that is being drawn together now – the conversation is driving the output. For [REDACTED] he wants to go to meetings and have preconceived ideas and notions challenges, and the meeting did do that for him. Being prepared to be open minded is where the value can be added.

In terms of lessons for the future, the first one would be how we get the best of all the expert groups together. It helps for the groups to be in the room at the same time having the same discussions rather than lopping round the groups separately. A list of expertise for each

advisory group would be useful to understand when to just use ABSG and when to use the groups together for efficiency and effect.

██████████ noted that he has been talking to colleagues about how to use advisory groups more effectively. He is keen to use the groups together more and bring in the networks – something ██████ recently discussed with ██████ and will help draw in skills and expertise of ABSG colleagues and contacts. The value comes more from the discussion rather than the set piece written advice, and keen to ensure that we build on that.

██████████ reflected on where the policy perspective has come from and where the Commission is going. Going back to the National Strategy development, the Commission had a reasonably clear playing – there was a gap in terms of the strategic view over the landscape. The Commission stepped in to deliver that and had some freedom to decide what to look at. In drawing closer to the publication of the White Paper, that freedom has reduced – the White Paper will set much of the policy framework and landscape. The Commission will need to be very focused on the delivery of what comes from the White Paper. The consequence of that is that in practical terms our regulatory bandwidth and resources will be primarily focused on delivery. The bulk of what we are working on are in the White Paper space and there will be less space to do the things that we choose to do.

██████ noted that from that, there will be a narrowing of the ability to come up with what we want to work on – presumably the White Paper will have a broad range of asks. ██████ clarified that the White Paper will set the priorities for action and the Commission cannot lose sight of that. There will be less room to pick up new ideas. One of the hopes is that we will move away from constantly layering interventions on top of the other and not knowing what the impact. There will likely be a smaller number of big actions which we can follow all the way and understand the impact. ABSG could help us to focus on the outcomes rather than being distracted by new issues.

██████████ asked if there is any preparatory work that could be started now in advance of the White Paper, given the holding space. The continue to wait model is a worry.

██████████ suggested that there will be areas which will come as no surprise – there will be a heavy focus on online and parity of protection in online and land based. There is a sense that online has some catching up to do and areas where land based could learn. In terms of looking at emerging evidence base that would be a focus. Another area is ensuring a robust approach to evaluating our work. That means understanding our baseline as a starting point – much of which will be captured in the advice. The third area is staying really close to international development, what is working and what isn't. There are a range of jurisdictions trying new things and it will be important to understand that. Strong links with the international academic community will be key – both to understand what is being published and how we could feed into new work.

██████ noted that the overall refocus on the statutory remit is in part borne out by the fact that the Commission has been under intense scrutiny on performance on our role as a regulator. That limits our freedom to an extent. Where we have spotted gaps in the past we have tried to fill it rather than advising of that gap. Board are very keen to focus

Importance of evaluation – absolutely agree, not tied to a specific topic but need to build internal awareness and processes.

Challenges – white paper in the sense that the process followed by Government will develop expectations and disappointment on publication, affordability/financial risk will be the most contentious policy undertaking the Commission has ever undertaken, NL transition, and an internal change particularly operationally. What we have never grasped is harnessing the proactive influencing approach and breaking out of enforcement led regulation. Six new Commissioners will significantly change the scope, feel and view of the Board.

█ noted that Australia are changing their safer gambling messaging to be harsher in respect of the potential harms. That is based on some research that █ contributed to, and he would like to see something similar. █ has carried out research on the UK gambling industry messaging which shows that current slogans have no impact on behavior.

█ referred to █ feedback and noted the impact on the team and the direction. ABSG are there to advise, not to tell the Commission what to do so useful to hear about that reframing occurs from discussions. █ asked if what if the way we see the problem is the problem. Framing is in tune with the terms of reference. ABSG can support and challenge, and the strength of the network of expertise will be key.

█ welcomed █ point on online, evaluation and international development. To █ point the summary of challenges and changes was very useful. Whilst understanding the point on refusing on statutory remit, another regulator has looked at regulatory function as well as the support and influence role. In discussing with another regulator looked at how those resources are divided up, 30% of resource goes into support and influence and that creates a more proactive and future focused regime. If we are not influencing others then the role of the regulator on this space is galvanizing actions by other agencies. The evidence and evaluation space is highly contested and therefore the support and influence is key to the success of the regulatory model. So many regulators talk about the statutory bit but has to be collaboration.

█ agreed that influence takes all shapes and forms – our focus needs to be how we influence licensees. Preventing harm rather than reacting to it starts with licensees. That is where the enforcement led approach is inefficient.

█ noted that regulation has to raise standards for everybody. It is in the interests of operators to drive transparency. █ reflected that the 70/30 split has been in place for the most part in the Commission. On sitting down with lived experience groups, he noted that our regulatory performance was starting to undermine our credibility in the influencing space – we are being asked why we are not enforcing the rules that we already have in place and focus on our own operational performance.

█ noted that influencing licensee is key – gambling is not a normal consumer market, a lot if the competition is using behavioral design and trick consumers into losing as much money as possible. Reverse withdrawals were a classic behavioral design which the industry used – that is a good example of action taken to address. █ noted that in that case where we took a clear decision and banned the work – it is getting the balance right in terms of an appropriate control to put into place. That is where practical advice based on research can be used to inform operational decision making. █ noted that there are international examples – bans are quite a crude tactic. Australia has a good example on in play sports betting – it's not banned, it has to be done over the phone. Qualitative research showed how off putting this change was.

█ asked how the current ABSG forum works in terms of a range of perspectives? Are there differences of opinion or do you see things in a broadly similar light? █ noted that there is, but there is less so now – reflecting on people like █.

█ noted the reference to recruitment – there are points which might drive recruitment. █ noted that using networks to bring in different contacts would be useful to bring in those different perspectives and to have constructive debate. ABSG should think about how other regulators are working internationally. The work has been less nuanced at looking at problem solving and the tools available. Engaging across the advisory groups brings different views as well.

█ noted the need to discourage groupthink and current recruitment will focus on diversity of thought. █ noted that the three areas suggested by █ would be really useful to centre into plans for ABSG. █ added financial risk and affordability, 4NL transition and moving past enforcement led regulation. All the issues are related to shaping the Commission's direction.

ABSG Meeting 15 February 2023

Present: Anna van der Gaag, Cath Cooney, Jane West, Philip Newall, Ulla Romild, Hermine Graham, [REDACTED]

Evidence Strategy Session

Present: [REDACTED]

Welcome, apologies and declarations of interest

[REDACTED] welcomed Board Members to the meeting and asked members to introduce themselves.

[REDACTED] acknowledged how incredibly sad and sorry she was to see [REDACTED] go and recognised all the work [REDACTED] had contributed to on ABSG. Acknowledging [REDACTED] has an incredibly long and deep knowledge and that the work ABSG do and continue to do, will be part of [REDACTED] legacy.

There were no new declarations of interest. [REDACTED] confirmed that the website hasn't yet been updated with new declarations, however this is in the pipeline. [REDACTED] also advised the new conflict of interest policy will be circulated to members before it goes live on the Commission website.

Minutes of the previous meeting

Minutes will be presented to the next meeting.

Chair's Update

[REDACTED] introduced the Chair's report and asked if there were any other updates/comments to provide. None were reported from the Board.

Update on workshop

[REDACTED] shared reflections from the January workshop with Commission colleagues, noting good discussions held, recognising that there wasn't as many attending from senior Executive team as ABSG would have hoped. Conversations were mainly held with [REDACTED] and [REDACTED]. Despite this, [REDACTED] felt this was a good discussion with [REDACTED] on the immediate future and key priorities to work on. One was parity between land based and online in terms of protection, getting better at evaluation, bringing to the attention of colleagues what was going on in terms of international research and are there any lessons we can learn from other regulators.

[REDACTED] reflected on what she took from discussions with [REDACTED] – demonstrating the effectiveness of regulation, pressure on the Commission to show how it is being effective, how we do that better (a big question). The second, how we engage more proactively with operators, recognising this is not something considered so much by ABSG before. Rather than being reactive, how do we become proactive as a regulator.

[REDACTED] asked the Board for reflections on the workshop:

- [REDACTED] commented that it was an interesting meeting, trying to think creatively about how we can promote safer gambling. Raised about banning things and trying to think about other interventions one could do beyond that. [REDACTED] noted Australia's

approach to in play sports betting and this fitting with [REDACTED] suggestion about looking at regulation beyond UK shores. Acknowledged what [REDACTED] said about longer interactions with different advisory groups and people at the Commission.

- [REDACTED] still keen to do a piece of research for messaging on safer gambling - would like to do more interactions going forward. [REDACTED] recognised Andrew Rhodes has an interest in how the Commission can do more on messaging. Highlighted the opportunity in April/May for ABSG to talk to [REDACTED] more about this and despite Bristol, finding a way around this – noting it would be really good to find creative ways.
- [REDACTED] reflected that the notes taken took her back into the room and thanked [REDACTED] for the excellent set of notes. [REDACTED] noted that [REDACTED] spoke about how the team had worked to re frame after meeting with ABSG and other advisory groups and commented that if ABSG can help to reframe that's helpful – recognised this was completely within ABSG's terms of reference. [REDACTED] also reflected on how ABSG can continue to advice GC in that broader scope. Noted the challenge made regarding whether group think is present, which [REDACTED] commented was a good challenge and in reflecting on this, [REDACTED] sees that ABSG have a shared purpose, each bringing different perspective and set of expertise.

[REDACTED] asked for any comments or questions on what the group had read or heard and also reflected on how quick the hour went. [REDACTED] was really pleased [REDACTED] is coming to ABSG to engage with the group. [REDACTED] missed the sense that everybody was there for the session, however understood why all of ABSG weren't and saw this as the first stage of building relationships. Recognised this as a big change for the Commission and ABSG and that the terms of reference will take some time to familiarise with. Noting that the immediacy of feedback could bring confrontation and a change in dynamics.

[REDACTED] recognised that a bit of a program of work will come with the White Paper and was pleased discussions in the workshop didn't get trapped in that and felt positively that ABSG had come away with key themes. Highlighted that time is being given at spring conference on evaluation, which can be used as a springboard for best practice for ABSG activities at the GC. Noted, the online protection work will continue to be ongoing. [REDACTED] also highlighted the Racing Post interview given by Andrew Rhodes on Sunday and the difficulties within this space but recognised that at least the Commission are having discussions around this. Also, noted that [REDACTED] attending isn't far off. [REDACTED] raised the topic of international academia and that the Board might want to think about how best to bring this work into ABSG work – considering what other regulators are doing.

[REDACTED] reflected on what struck her on the international front and referred to [REDACTED] & [REDACTED] - to keep ABSG in touch with what might be coming down the road of relevance to what we do. Noting other regulators, considering other innovations and think about how that feeds into ABSG's work with Commission colleagues and putting this more front of mind.

In response, [REDACTED] talked broadly about how other levers can be used, questioned how you use strategic partnerships well to achieve other things aside from a threat of a fine. Referred to thinking strategically about partnerships and highlighted that the focus on regulatory remit could be found as limited.

[REDACTED] asked that the group bring into the forefront international work and sharing this on an ongoing basis. Getting into the detail on online, which could come into the frame when the

White Paper (WP) is published. [REDACTED] recognised the work [REDACTED] proposes and work with [REDACTED] - the two immediate areas ABSG will be asked to focus on with the Commission. Noted that the WP has shaped the last year. [REDACTED] looking back at the GAR advice, noted there was good reference and suggests [REDACTED] & [REDACTED] review, and highlighted the need for more peer reviewed research. [REDACTED] felt it was a shame that the paper isn't published.

[REDACTED] asked do we have a sense of when the advice might be published. [REDACTED] advised that there wasn't a timeframe for the Gambling Act Review (GAR) and advised of the process for publication - the Government will publish the WP at which point Commission advice will be published and then alongside it the advice of Advisory Groups. [REDACTED] did note that advice from ABSG has already been shared with DCMS and advised that this has been influential in interactions with DCMS over this process. [REDACTED] also noted that the Commission have been approached for a meeting with LEAP and Secretary of State (SoS) for DCMS, and that (DCMS) appears where gambling will continue to sit.

The Board raised a concern that ABSG's advice to the White Paper becomes out of date and flagged whether ABSG's advice could be shared across the Commission. So, that the team could look at areas that ABSG flagged regarding areas of research, sharing internally to inform thinking. [REDACTED] confirmed that it has been shared with GC colleagues working on the GAR. [REDACTED] raised whether there has been any new research on the topics ABSG covered and that later references could be added as foot notes in light of delays. [REDACTED] commented that from March 2022, the Commission recognised that we were trying to maintain a document and prefer saying that was the advice of March 2022. Noting the challenge is that we don't know when the WP might come out and therefore the solution may not be keeping the document up to date.

[REDACTED] asked that members are mindful of new research and keep this in mind.

Evidence Strategy Session

[REDACTED] welcomed [REDACTED] and [REDACTED] to the meeting. [REDACTED] asked members to introduce themselves to [REDACTED]

[REDACTED]

[REDACTED] gave a brief overview of the work to be discussed today. Following a session with ABSG in November, an approach has been agreed with the Commission's Executive team, and a draft paper has been produced. This is a high-level document and is intended to offer transparency about our evidence agenda, to identify where we want to get to and to enable external stakeholders to understand where they can contribute to the bigger picture. The priority themes have moved on from the original approach focused on the licensing objectives. Based on the feedback last time, the research themes have been updated:

- Understanding the range and variability of gambling experiences
- Understanding the impact of operator practices
- Product characteristics and risk
- Gambling-related harms and vulnerability
- Early gambling experiences and gateway products
- Illegal gambling and crime

Points on methodology and development of evidence will be drawn out in the sections on the Commission's role in delivery and monitoring the evidence base.

Key questions for today:

- Reflections and feedback
- Is there anything missing or anything that should be clearer?
- Are the themes sufficiently explained?
- Is it doing what we want it to do?

█ opened the session with a question – how is this a strategy document? In her view, strategy is the overarching mission, enablers, goals and outcomes. This document feels like an analysis of the areas that the Commission wants to get into. How does this link with the data strategy work?

█ explained that in first starting this work it was discussed as a strategy – in development it is now more of a plan driven by analysis and understanding. It is more action orientated now. This is where we want to be firmer about what year 1 looks like but with flexibility about future development. In respect of the data strategy, that will be more about enabling this to happen. For some questions, delivering the data strategy will enable us to do the work needed to answer these questions so that is where the work will connect.

█ asked what the Commission would see as the aim of identifying these gaps? Is it internal or is it to identify areas for external researchers. █ explained that it is both, probably more on the latter. It is an opportunity for the Commission to be clear that it is an imperfect evidence base in many ways. The initial session identified over 100 research questions. █ noted that this is also about clarity about the scope of our remit. There has been a broad discussion about how and where we should get involved – we need to be clear about what we can do whilst acknowledging that gaps still exist.

█ advised that the DAP perspective is being evidence led supported by data is a strategic theme which needs some tactics. That will be a pillar of what the Commission does. █ sees this work as lower level actions and tactics in support of a wider strategic goal of being data led. On DAP, we agree that it is essential to have that supporting strategic theme at the heart of what the Commission does. We see data as a foundation of evidence, and being evidence led in regulation is the right way to go. That is all forms of data, and about innovating with evidence and data and bringing other stakeholders into the theme.

█ agreed that the paper needs to sit under something more strategic and maybe the data strategy is the right place. There is some overlap so would like to see the two pieces of work integrated.

█ agreed that data is referred to in the broadest sense, and that anyone reading this needs to be able to join the dots with the strategic purpose.

Theme	Name	Comments
Illegal gambling and crime	█	Main point on black market is the way that new technology can change this. Crypto gambling has extra risks and is not widely talked about. It is advertised quite a lot – short sponsorships in football.
	█	Scope of the question is huge. Resorting to crime to fund addiction is very common in gambling addiction from his experience of working with those with lived experience and affected others.

	<p>Undetected crime and criminal activity (such as theft from family or friends to fund gambling activity) – how much of that is happening? In relation to enforcement action by the Commission, do we know if that increases black market gambling as that is a constant refrain from the industry. What do we understand about the impact of regulatory action?</p>
	<p>Would encourage involving other partners here – the Police for example. Pilots going on about routine enquiries about gambling so would be useful to see that perspective and data. Criminal justice unit would also be useful.</p>
	<p>Noticed throughout the document that there were no references to inequality and prevention which are key to public health and should be key to a regulator. As an example, where operators target disadvantaged areas gambling is normalized in communities where people are least able to afford to spend money. From addiction the only option is to find money to gamble. The regulator should work towards stopping targeting particular areas and identifying a pathway of addiction for people who gamble. There are opportunities here for regulation. That relates back to access to other data sets and ABSG have campaigned for gambling related indicators to be included in public health monitoring.</p>
	<p>Huge area of work – how easy it is for consumers to tell if they are using a regulated operator? Used question in last survey and 1% to 2% said they had used illegal sites online but 5% said they did not know who was regulated. Recent Swedish study reviewed court sentencing records for references to gambling.</p>
	<p>On unregulated operators, consider the phrases tax evasion (illegal) and tax avoidance (wrong). Series of grey areas which are technically not regulated, technically not illegal but could be gateways to all sorts of harms. What is not regulated but ought to be – what new forms of gambling are emerging? Monitoring activity devoted to AML practices in regulated industries - do we know the extent to which actual money laundering happens, whether in illegal or regulated entities and what does that say about monitoring processes?</p>
	<p>May benefit from a taxonomy of what is in this bucket – need to define the types of activity and then consider the priority areas. Agree on the link between harms and spending proceeds of crime which ties into the source of funds checks that operators should do. Would also like to understand data sharing with the NCA – believe that this does not happen but if operators are sharing SARs would be useful to tap into that intelligence. Affiliate regulation is not yet in place but would like to understand why as other jurisdictions are looking at this.</p>
	<p>What are operators telling us now about criminal activity? Link to GC AML stats needs to be in here</p>
Early gambling experiences	<p>Looked at the GAR advice on CYP – the other area that would be worth looking at is advertising and the role that advertising and marketing plays in raising CYP awareness and normalization. From a public health perspective would consider other factors such as</p>

<p>and gateway products</p>		<p>family member gambling and the role in gateway to gambling. In substance misuse, family members engagement in drug use is a gateway issue for young people who are more likely to use drugs themselves.</p>
	<p>████</p>	<p>████ mentioned clarity around definition and that is a general need throughout the document. Certain terms mean something different to different people – e.g. harm, vulnerability, risk, early gambling (needs age group) to be clear to everyone what is meant. Accept what is doable and what might be really hard to do – what is possible and what is outside the remit of the Commission. With reference to other life events and pathways, it is really difficult to understand that in research terms. Focusing on epidemiology to get that type of data might need different approaches to the life events work. Would need cohort data to associate factors and outcomes. On early experiences, is this individual or general exposure, also gaming culture is missing.</p>
	<p>████</p>	<p>Where is the evidence that the current level of marketing and advertising is safe to young people? Have been piloting work with CYP and the evidence is that long term normalization has changed their perception of risk and they consider that gambling is safe, harmless and fun and there is no recognition of a risk to mental health.</p>
	<p>████</p>	<p>Childhood exposure to gambling and marketing. Raises a broad point about limitations of data and we should not be scared to draw conclusions based on the limited data that we have. As an example, government have decided not to regulate loot boxes in the absence of evidence – this is simply a research question which needs to be answered and causal evidence will not always be available through experimentation. We have to draw conclusions based on the evidence we have available. Useful to see inclusion of research on legal gambling like child machines – good to see it noted here. They may be less harmful but are frequently engaged in and can be an issue.</p>
	<p>████</p>	<p>What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature - ScienceDirect</p>
	<p>████</p>	<p>The ABSG advice on the GAR noted the growing investment in education for young people – there has been a debate about what is appropriate and how it should be best taken forward. Not strictly for regulation but relevant to the protection of CYP.</p>
	<p>████</p>	<p>Categorization of what we mean in this section by early and young. Are we going as far as 18-24 or is this focused on 11-16? I am interested in some of the statistics and data published by the GC in relation to problem gambling rates by age group. We use 16-24 age range and in the latest publication there is a very high PG percentage (1.4% for that age group) with a wide confidence interval, and the fact that it is self report. There is some evidence that the problem age group is 16-24 and it is the group where social marketing has the most impact. A more detailed focus on that age group is suggested – is there specific additional research that could be done</p>

		on that age group? There is also an issue about the way in which we quote numbers – we should be as explicit as possible about the data that we do have. The numbers could be dramatically different when other factors are brought into play – that has an impact on social norming and that can change views.
		On gateway products, are we defining products that are not gambling but lead to gambling, or softer gambling products – needs to define. We should be cognizant of some of trends in this age groups – streaming on Youtube for example, as well as themes of gambling. What innovations in some of these forms are attractive to CYP?
Gambling-related harms and vulnerability		Legacy harms and post addiction – how does regulation impact that experience of living in a society where you are constantly encouraged to engage in behaviour that is harmful?
		Absence of a public health analysis and wider determinants of health. This area has the most research questions which could arise. The ABSG GAR advice has a huge number of references to the existing data but would need to check how up to date. The acknowledgement of the voice of lived experience as evidence.
		Need to clarify definitions. Vulnerability has been discussed a lot by ABSG. Difficult area to research but is where you need routine collected data at a Local Authority level to consider impact and risk factors. The focus would be clarifying the definitions and considering other data sets which might feed into demographics and characteristics. On co-production, a new intervention will be better received when people affected have been involved in developing and delivering the research.
		In Sweden, assigned researchers to look at the societal costs of gambling harms and how this affects society as a whole – consequences are not always acknowledged.
		Warp around environmental factors such as the number of betting shops in an area and understanding how that affects peoples vulnerability to gambling. Is the cost of living crisis a factor. Where people live, mental health, age etc could all affect.
		Types of vulnerability and definitions
		The industry struggles with the term vulnerability – what would you expect the industry to take into account?
		Transition points – why do people not carry on the journey to problem gambling. What factors prevent or influence the failure to make that transition? Examining through qualitative data to understand what factors prevent people from becoming problem gamblers?
		Its not always a journey – important to measure but hard to do so
Product characteristics and risk		It is mentioned that there have been some regulatory developments – questions don't cover the impact that these have had?
		Speed of play in online slots – that is relevant across all gambling products. In play betting has a higher speed of play – current themes are good

		<p>and others have done work on product characteristics which are more likely to make products addictive – important to look at new products and understanding evidence.</p>
		<p>Need to define risk and being very clear about our meaning as will look different for different products and ways of gambling</p>
		<p>Welcomed the inclusion of this theme – needs to be something about individual choice and societal choice in considering risk</p>
		<p>Would argue that there is not significant real world research available – mostly experimental. Reference existing tools – there are major shortfalls so including these might suggest that these are fit for purpose. The link to harms needs to capture other harms and what elements of the products link to different types of harms.</p>
		<p>Canadian project identified lower risk gambling guidelines Interaction and the range of products – some products are more inherently risky</p>
		<p>Why don't we ask what are helpful and protective product characteristics to share awareness? To what extent do marketing tools and techniques that may prove harmful built into gambling products?</p>
Understanding the impact of operator practices		<p>Key issue – e.g. VIP schemes, operators designing safer gambling messages, safe gambling tools in ways that are designed to fail. Everything that operators do is designed to maximise the amount of money that people lose and safer gambling tools are designed to be ineffective. Any area where operators have choices in terms of a given practice they will choose option to maximise customer loss.</p>
		<p>Values – including values in some of the questions. More broadly, where is there a values approach in the gambling industry?</p>
		<p>Skybet have a safer gambling advert now – covered in advertising while a safe gambling message is read out. Although processes are in play do they prime people to think about the message or to want to gamble due to the branding? Size and positioning of safer gambling messaging.</p>
		<p>What is the impact on someone suffering harm from receiving inducements, free spins etc? The GC is stepping up enforcement – what is the impact of fines and actions on practice? Safe gambling and relying on the individual to act does not work</p>
		<p>All important questions – nothing to add</p>
		<p>Which operators do not use harm detection algorithms and safer gambling tools? Should that be monitored and published How do harm detection algorithms affect marketing practice – should link so there is no risk of human error?</p>
		<p>Commercial determinants of health – industry requires that you have to prove something is harmful rather than the other way around. It is hard to prove things in wider determinants of health. There is working towards reversing that influence to proving something is not harm and educating that there is not a way to evidence everything. The challenge is to have a research strategy that can deal with that. Learning from other commercial determinants – food and alcohol – will improve understanding of methods like cohorts. It is not ethical to</p>

		test things – need observational research. Research that can show industry the value of some sort of corporate responsibility.
Understanding the range and variability of gambling experiences	██████	Nervous about this being presented first and is for too vague – needs to be much more specific.
	██████	Not content with the positive play focus – should focus more on people who are harmed by gambling. Report due from the Victorian Safe Gambling Foundation which has some great work on measuring gambling harms.
	██████	Needs to make reference to the primary role of the regulator to protect the public. Concerned about this being the first theme – interesting but not as relevant to the role of the regulator.
	██████	Is there a question to make sure that we explore the spectrum of the gambling activity – how the initiatives from operators/GC have had any impact on that experience or behaviours?

██████ thanked the group for the range of perspectives. A strong takeaway is around the sharpness of language used and removing the room for misunderstanding.

After returning from a break, ABSG reflected on the discussion held on the Evidence Strategy and ██████ asked that members please send in any peer reviewed references to share with ██████

Reflections from ██████ on her work with ABSG

██████ commented that it has been a delight working with the Board and that she has spent some time looking back on what has changed over the past six years and her recommendations for future work:

- Over the term, the Board has changed demographically and dramatically in size.
- Noted that the Board previously visited operators which was useful and recognised that it was felt the view from before was that the problem wasn't the product, but the person. ██████ felt this has changed noted awareness now from a public health perspective.
- A shift in the dynamics of the Board - RBSG (formally named) held ownership of the strategy and a major positive change was the adoption by the Gambling Commission and rolling out to implementation boards across the UK. ██████ was partly sad that not so involved in this.
- Noted positive changes from ABSG involvement, i.e ban on credit cards and the adoption of a public health model of perspective with consideration to the environmental factors that are in play that influences a gamblers journey.
- Recognised good engagement with the LEAP panel.
- Felt it has been an interesting six years - positive changes with room for further development. ██████ noted that she feels the Board is heading in the right

direction. Questioned whether what the scope of the Board does if going to be too limited.

- Hope for next steps - it is really important for the Commission as the regulator to measure its impact. Also, ██████ felt if the Commission continues to hold the RET list this should be of regulated and formed of approved providers.
- Noted positive change in advertising and marketing, however the risk is that the industry finds ways around this. Suggested the Board think about the loopholes, i.e where young people are following gambling companies on Twitter. ██████ reflected on the Department of health and social care adopting treatment and the research agenda.

█████ recognised that ██████ was spot on with her denotation of challenges and next steps. The Board all thanked ██████ for her contributions and recommendations for future work.

█████ asked that members put some thoughts down from discussions today. Noting that some context is missing from the Evidence Strategy and reflected that there was consensus from today's discussions and hoped there was value in the approach taken.

Action: Members to add any comments they wish to the draft paper shared to enable ██████ to share these with ██████ by Friday 17 February 2022 (if possible).

Any Other Business

None notified

Meeting of the Advisory Board for Safer Gambling: 2 May 2023

Venue: Remote meeting
Time: 12.30 – 15.20
Attendees: Anna van der Gaag (AVDG) (Chair), Cath Cooney (CC), Philip Newall (PN), Ulla Romild (UR), Stephen Sharman (SS), Jane West (JW), David Zendle (DZ)
In attendance: Andrew Rhodes (AR) (Item 4-5), [REDACTED]

1. Welcome, apologies and declarations of interest

- 1.1. AVDG welcomed Board Members to the meeting. There were no new declarations of interest.
- 1.2. The group discussed switching back to Zoom for future meetings.
- 1.3. AVDG welcomed [REDACTED] and [REDACTED] to the Board and thought it was a great time for them to join especially with the publication of the White Paper.

2. Minutes, matters arising from February 2022 and opening remarks

- 2.1. The note of the February meeting was shared. [REDACTED] explained that ABSG have a short note of the meeting that it published on the website and a more in depth note for internal use.

3. Welcome

- 3.1. AVDG introduced the two new members of the group and asked them to introduce themselves.

3.2. [REDACTED]

- 3.3. [REDACTED] He is keen to look at how ABSG works with Lived Experience.
- 3.4. [REDACTED] explained to the group that the White Paper publication will be a big focus for the group to provide advice. She explained that the Commission doesn't always want formal advice but short and interactive discussions and sessions.
- 3.5. [REDACTED] explained that she would like the group to be involved in the following immediate next steps:
- Helping with the wording of consultations
 - Taking forward the statutory levy
 - Working on the online gambling area e.g. game design and messaging
 - The Commission's data capability and strategy
- 3.6. [REDACTED] explained the role of the programme manager for the GAR advising that they have already spoken about how advisory groups can be involved with the GAR work. [REDACTED] also advised that [REDACTED] is keen to work with ABSG on the online work.
- 3.7. ABSG noted that advice from advisory boards and links to the advice were prominent in the White paper.

4. Reflections on White Paper publication

- 4.1. AR advised that a lot of work is for DCMS to control and take forward including the consultation work on the statutory levy which will include thinking about the distribution of funds and RET organisations.
- 4.2. ABSG noted that there are 80 work strands that the Commission will be involved with, and one big item will be on player protection checks (formally player protection checks). This will be consulted on by the Commission.
- 4.3. AR reflected that there were a number of missing pieces in the GAR including marketing and advertisement.
- 4.4. ABSG were advised that the first batch of consultations are due to be released in Mid-July, noting that after that it is harder to predict the timelines. The timeframes are challenging and it is expected that all consultations will need to be completed by Summer 2024 / election.
- 4.5. AR explained how much work is involved with changing things like the LCCP, which will include addressing misuse of information and addressing how to enable c2400 operators to make any changes. ABSG were invited to ask questions and make any remarks.

- 4.6. ██████ praised the enormity of what's been achieved through the publication of the White paper.
- 4.7. ██████ expressed her appreciation of being taking through the informal GAR run through, advising that she was struck by the consultation work. She thought the tone of the GAR was good. She then when on to explain what ABSG may have to offer in terms of support which included:
- Advice on consultation wording
 - Levy advice
- 4.8. AR explained that it was too early to say how ABSG can be involved with any consultation on the Levy as this will be a DCMS ran consultation. He advised that the big questions at the moment will be around how much the levy should be and how it the levy would be distributed. AR did advice that he thinks DCMS would be open to advice once this work has commenced but not too early on.
- 4.9. ██████ noted that she believed the levy would provide a robust model to distribute the funds available and would attract a wider pool of organisations to be involved.
- 4.10. AR explained that there the levy could help with some scenarios including the belief that industry is vetoing research work and it will hopefully invite organisations back who do not want voluntary funds. He advised that there is work to look at on how much the levy should be and that this work is making some people nervous.
- 4.11. ██████ asked about data and how it will be used for work. ██████ advised that he is closely involved and that the GAR work on data is a work in progress. This will include the customer journey and customer data being used for better regulation and compliance at the earliest opportunity. Intelligence data is also an area to look at alongside research.
- 4.12. ██████ advised that there are a number of strong longitudinal studies but there have been issues with progress in this area.

5. International Strategy

- 5.1. ABSG welcomed ██████ and ██████ to the meeting.
- 5.2. ██████ gave an overview of the work and talked through the slides which were slightly reordered form the pack sent to Board members.
- 5.3. ██████ explained that they are working on strengthening international reach through research and have a number of opportunities in the pipeline.
- 5.4. AR provided his thoughts on this the international strategy work and advised that there are a number operators who work in multiple markets, meaning that there are a relatively small number of operators. He explained that operators are usually unhappy when gambling regulators work together and discuss the

market. The Gambling Commission also deals with emerging issues first and we have a lot to give to other regulators and jurisdictions. Working with other jurisdictions will ensure that operators are held to account and high standards remain.

- 5.5. ■ found the overview from colleagues interesting and saw the advantages of working internationally and utilising the findings from elsewhere including the transfer of generalisation and transferability.
- 5.6. ■ asked if there is any guidance on this that ABSG are aware of. She was advised that there may not be specific guidelines but making sure that the right people are in the room for discussions is a key factor.
- 5.7. ■ advised that he had attended a conference in Canada in April where lots of state-owned operators also attended. He advised that they are more likely to share data with independent researchers. He also commented on his previous role in Australia around the messaging for Gambling. He advised that their approach is to make it more difficult to gamble rather than banning gambling at certain times. He provided the example of gamblers having to call to place a bet instead of being able to use an app. The results are looking positive as young gamblers in particular are unable to gamble on impulse and provides time to think about what they are doing.
- 5.8. ■ also advised that this point links to regulation and horizon scanning the international scene. When analysing international business knowledge gaming data could also be used. This also links to people having more control over their data.
- 5.9. The group also discussed Australia requiring operators to provide consumer data on behavioural economics e.g. what has a consumer lost and won each month.
- 5.10. ■ advised that the Commission has good relationship with the Australian Regulator and could look into this. The group were also advised that New South Wales has some work on land-based gambling including gambling smartcards.
- 5.11. ■ advised that global gambling industry regulatory networks such as The Gaming Regulators European Forum (GREF) are important to work with. She informed the board that she was recently involved with a Nordic gathering to discuss the possibility of a common gambling study but with many differences in regulation in different jurisdictions could make it difficult but felt that collaboration is the way to go.
- 5.12. ■ asked the group to think about genuine learning from other places and what the Commission should be doing to ensure that opportunities aren't missed.

- 5.13. The group briefly discussed looking at regulators in other sectors, e.g., Cosmetic surgery in Australia which uses a combination of technology and regulatory muscle to stop unlicensed operators.

6. Group discussion on how ABSG can support our international work and research of international academia

- 6.1. AVDG invited the group to discuss how ABSG can support the international work and research of international academia.
- 6.2. ■ advised that she has tried standardisation from a technical requirements point. She advised that they put in more work than they got out of the process due to the compromises that were required. She said that the base level data is universal, but research and evaluation is making a difference. She also advised that generalisations differ between jurisdictions and will be affected by different things such as childcare, working hours per week.
- 6.3. ■ advised that standardisation in regulators expectations in evaluation and robustness was crucial. She advised that the Commission is improving the expectations on evaluation etc. that is expected.
- 6.4. ■ developed the point further by advising that we need to state what evaluation should look like and our expectation of what this is. This is due to the fact that evaluation of regulatory activity/natural experiment etc. rarely get evaluated.
- 6.5. Members provided the following points on evaluation:
- ■ advised of the work of Pawson and Tilley's on Realistic Evaluation.
 - ■ said that evaluation is often a piecemeal of evaluation and is often not completed but thinks there is hope to increase evaluation processes.
 - ■ advised that new regulation/legislation launched in 2019 but not seen much because of the pandemic. She advised that we could speak to other agencies to build a partnership.
- 6.6. ■ asked if we are looking at what other regulators do internationally or other bodies in the regulatory environment.
- 6.7. ■ advised that the Commission is looking at difference cultures and how they approach regulation to understand best practice and learn from other regulators.
- 6.8. ■ said that being more open when dealing with conferences etc. and having an open call for submissions could be useful as well as having a remote attendance option to get more people in the room.
- 6.9. ■ said that they would consider this to make the most of the opportunities available.

- 6.10. ■ asked the board what their view of the landscape is with trade bodies and are there similar bodies when we think about gambling?
- 6.11. ■ advised that in academic research the output /findings must be published. However, when thinking about evaluation of regulation the same stipulations won't apply. She asked if a network of regulators who can collaborate together on what's happened in the different jurisdictions could be an option.
- 6.12. ■ advised that crime and illegal gambling is usually the way that the Commission's initiates contact with other jurisdictions.
- 6.13. ■ advised that there is a lot of old research (c10 years) which shows high rates of harm in illegal gambling. She asked if more should be done in this space.
- 6.14. ■ mentioned that the grey and black-market Oslo conference hosted by Norwegian lotteries she heard that a Norway monopoly protection tried to challenge some of the big gambling companies. She advised that operators will act differently in markets depending on whether they want/have a license for that jurisdiction. She also mentioned that Swedish research related to crime and convictions looking at the actual crime committed which is not just money laundering.
- 6.15. ■ asked how we can learn from other parts of the world and how looking at policy that does and doesn't work could influence our work by evaluating regulation using ad hoc academic models, incentives to evaluate regulations and novel ways to receive and refine data from other places.
- 6.16. ■ advised that he thought it was important for the Commission to lead by example as so many other countries look to us as a model of best practice.
- 6.17. ■ advised that he may reach out to ABSG members for specific expertise.

Action – ABSG to specify their areas of expertise to help guide work and engage with specific people rather than the whole group.

- 6.18. ■ advised the group that there are lots of sessions in the pipeline for engagement over the next few months and we will be able to build in internationalisation as part of this schedule of work.
- 6.19. The following actions were noted from this discussion:
- ABSG to specify their areas of expertise to help guide work and engage with specific people and smaller working groups between meetings.
 - ABSG Members to send any relevant information and/or research on international work.

7. Forward Look

- 7.1. AVDG and ■ outlined the forward look to the group.

- 7.2. The Board discussed how and if they could get involved with any consultation work. ■ will discuss this with the programme manager for the GAR work.
- 7.3. ■ explained the role of ABSG on advising the Gambling Commission which in turn helps to frame Gambling Commission advice to the Department and Government.
- 7.4. The Board reflected on the meeting, noting was good to get AR's perspective of how things stand after the publication of the White Paper at the start of the meeting.
- 7.5. The Board were reminded to send any ideas or information regarding international areas to send directly to ■ and ■

8. AOB

- 8.1. ■ advised that he would be contacting ■ about travel arrangements for the 24-24 May meeting.
- 8.2. ■ Reminded ■ that a photo and bio was required for the website.

ABSG Meeting 24 – 25 May 2023

Present: Anna Van Der Gaag (AVG) (Chair), Cath Cooney (CC), Philip Newall (PN), Ulla Romild (UR), Stephen Sharman (SS), Jane West (JW), David Zendle (DZ), [REDACTED]

In attendance: [REDACTED] Tim Miller [REDACTED] Item 3), [REDACTED] Lucy Denton [REDACTED] (Item 7), [REDACTED]

1: Welcome, apologies and declarations of interest

[REDACTED] welcomed Board Members to the meeting and highlighted that the last in person Board meeting was in November 2021.

[REDACTED] reflected on the recent publication of the White Paper (WP) and ABSG's contributions to this. Recognising the time that has elapsed since ABSG provided formal advice on the White Paper and the sense that ABSG has been in transition waiting for its publication. Acknowledging the significant amount of work which will now follow.

There were no new declarations of interest (DOI's). [REDACTED] raised that the DOI's on the website remain out of date. [REDACTED] confirmed this was in motion, however, would follow this up. [REDACTED] confirmed that the website was now up to date with recent membership changes and that we are working on updating the website with the published minutes.

Action: [REDACTED] & [REDACTED] to complete and finalise ABSG website updates

Item 2: Minutes of the previous meeting and matters arising

Minutes of 2 May meeting were agreed.

Item 3: Gambling Act Review (GAR) – Implementation plan and online protections

[REDACTED] introduced [REDACTED] to the meeting and asked new members to introduce themselves.

[REDACTED] shared reflections on the publication of the WP, noting the biggest challenge now is delivering at pace, whilst still making sure what we deliver is effective. [REDACTED] emphasised the risk if we work without attention to due process, this could result in unintended consequences. There are meetings across the industry that we intend to do at pace. As a fall back there is the ability to create licence conditions which don't require consultation in the same way, through a statutory instrument imposed by the Secretary of State (SoS).

[REDACTED] outlined that today's session would provide a high-level overview of the implementation plans, priority areas, and consultations planned for this summer (with the aim to publish these prior to the school holidays starting). [REDACTED] is seeking input from ABSG and other Advisory Groups as the team proceeds with delivering to the WP, however, spoke about managing expectations due to time constraints.

█████ advised that:

- The Commission (GC) is leading on 22+ WP deliverables, plus tracking actions from our advice
- Key items are affordability and financial risk checks
- GC is also monitoring industry deliverables
- GC needs to provide further advice as to whether additional legislation is needed
- WP sets out a multi-year delivery programme and there is ministerial pressure to proceed at pace.

█████ was concerned about the volume of work and whether there are sufficient resources available. Highlighted affordability checks as being significant, and asked is there some momentum to the other initiatives?

█████ outlined that in his view, whilst the pace we're going at is fast, it is appropriate. There is comfort that there are enough resources for the next twelve months and a clear commitment from the Board and Executive Team that further resources will be provided if necessary. A mix of big and small priorities over each consultation helps build momentum. █████ indicated that the GC has a lead role in delivering many of the commitments. The establishment of an ombudsman would both change the way in which the GC engages with consumers and has the potential to improve consumer outcomes.

█████ highlighted there is a joint program board with GC and DCMS colleagues which will ensure shared delivery plans, risk register and a means of holding one another to account. That some things we need to deliver are reliant on DCMS and will involve other regulatory bodies.

█████ queried whether Scottish and Welsh Governments will be on the Board. █████ was of the view that it shouldn't be for DCMS as to which part of Wales/Scottish government are involved, the invite may be extended, so that they can decide.

█████ reflected on when those might be slotted into the Parliamentary timescale and █████ noted the Regulatory Policy Committee haven't secured slots and dates. Secondary legislation should be driven before the general election. █████ noted the political imperative coming from SOS to get as much as this done before the election. █████ noted that although Consultation is a big part of our work, there is other work ongoing, i.e improving our participation and prevalence data and that the team needs to keep track of those, alongside consultations.

█████ opened for questions/comments on plans for overall implementation:

- █████ opened the session and touched on how the Single Customer View (SCV) pilot is progressing. The team hasn't drilled down into the exact data needed but is considering the kind of data that should be collected across multiple accounts to inform regulation and access to independent researchers.
- █████ noted the big deliverable is building in evaluation, and to do this, we need to be clear on success, base line data and where the gaps are. Noted █████ is leading a more strategic approach to data, supported by the Digital Advisory Panel (DAP) to look at the questions that will need to be answered as a regulator to inform the data needed. Focus is on collecting information for regulatory purposes which won't necessarily go as wide as research.

- [REDACTED] highlighted challenges of customer funds/account details and that the SCV pilot will inform work around this. [REDACTED] outlined the limitations of payment processors used by Operators which can't all identify the name on the payment method, they all apply to the name on the account. As more work is done on account level controls, increased checks on affordability/financial risk, it will positively impact customers trying to hide details. [REDACTED] noted that this reflected a key theme – interdependencies and that ABSG can help to identify these key topics and themes.

[REDACTED] identified there were too many projects to pick through and it was interesting to see where ABSG's interests lie. Noted two key policy areas for the second consultation window:

- Social responsibility inducements - looking at the controls placed on operators, are their offers socially responsible?
- Targeting - connected, customer led gambling management tools and player messaging. Looking at how customers can be encouraged to use gambling management tools and how that sits within the customer awareness journey.

Alongside other themes including, evidence conversations on participation and prevalence, consumer research and evaluation (how are others evaluating what they're doing, i.e SCV).

Emerging evidence issues

[REDACTED] referred to looking at emerging evidence issues to understand how they are impacting Commission work and how to prioritise ABSG's support early in the process. [REDACTED] asked ABSG for any thoughts on this:

- [REDACTED] reflected that he had a distinct interest in evidence related to the WP. He noted that gathering information about compliance, behaviour and safety more generally were all topics which could be summarised as data. [REDACTED] was keen to engage with what data could be gathered and stored and noted that engaging with others on this may be helpful. He referred to the limitations of not having necessary data, leading to an inability to draw good conclusions.

In response [REDACTED] noted that we are finding more pilot projects, where data might provide the answer and possible engagement with ABSG, DAP and the Commissions Strategy and Research and Statistics team may be helpful in posing questions that could be readily answered. However, was keen that the Research and Statistics team isn't used as a group to service the Commissions data needs. [REDACTED] indicated as data progresses; the team will be looking at how this needs to be measured. There is also a designated fund for evaluation, which the team wants to look at how this is spent. [REDACTED] noted that the evaluation leads are [REDACTED] & [REDACTED] and that there are some assessments of the review of our impact, informing our consultations.

- [REDACTED] agreed with [REDACTED] thoughts and gave an example of slots with a 2.5 second spin speed where it is not possible to conduct independent research. That gold standard real world data is needed to evaluate it and highlighted the importance of a data centric approach.

In response, [REDACTED] referred to the approach of a regulatory sandbox which the Financial Conduct Authority (FCA) uses, however noted that this would require statutory underpinning to

allow the GC to use this mechanism. For example, affordability checks, industry would like to do that as a pilot and so would the team, however unsure the GC could deliver on that.

- █████ noted the matter of ethics for the consumers participating in a regulatory sandbox. Also, cited asking for data now on the before and after metrics on cashless payments on gaming machines (land based) and machines in casinos, i.e spend per player and increased frequency in use.

Colleagues talked about the importance of thinking about whether data tells us about the regulatory impact, as just because spend has gone up and down doesn't necessarily reflect harm. Evaluation only provides part of the story, and some data doesn't exist. The harder questions are what data we need for assessment of regulatory impact and delivery against regulatory objectives. Data collection should include markers of harm, assessing how they have changed once you have impacted policy change.

- █████ highlighted an opportunity for data infusion and seeking data or requisition powers for the data. █████ noted that we have the powers, if we identify data, we can acquire it so long as there is regulatory purpose.
- █████ referred to both the frequency and expenditure taken together and primary indicators apart. █████ noted it is easier for online than land based, due to limitations with machines regulated by permits.
- █████ highlighted the importance of just having reliable information/data on how many people gamble and experience harm at a Local Authority level. Noting that some cash societies where people often fall under the radar.

█████ noted, there is not much in the GAR for those that only gamble land based. █████ highlighted that often the most vulnerable people are forgotten and that if everything would have been captured, there would be a pressure on Public Health to add to Public Health outcome framework.

- █████ commented that a big data approach can go beyond a prevalence survey and noted problems with trying to get data on land-based gambling spend.
- █████ queried whether the team deals with finance companies to receive data. GC colleagues reflected on the benefits of data sharing and how this can be overlaid on top of operator data.
- █████ reflected that the Summer Consultations overview table felt the right place to be in, providing time to discuss items in further detail. Also, wanted to make sure there isn't anything else that should be on the shared to do list. █████ noted that there may be adhoc items appear, as DCMS work through their list, and we may get data from other organisations, including joint discussions with LEAP.
- █████ reflected on the positives of collecting data, however also noted drawbacks i.e stakeholders aligned with industry. Asked where data should not be shared? And what we might accidentally be doing? █████ reflected on this and in his view doesn't see a world where we enter into agreements with commercial entities, nor will we endorse

commercial products or require industry to use a particular commercial supplier. Preference is maximum transparency.

- [REDACTED] noted concerns that the team doesn't have the opportunity to see innovative technology. [REDACTED] is keen to see these technologies and highlighted the current approach - to see the technology available and what's possible. [REDACTED] cited difficulties with the GC mandating the use of GamBan.

Statutory Levy

The group discussed opportunities to provide future input on the development of plans for a levy.

- A few ABSG members referred to a leadership vacuum that would potentially be created by the GC not being involved in this. Queried who was going to take this forward/be involved?
- [REDACTED] noted that as soon as you trigger the Levy it gets treated as public money and felt this needed to have Scottish and Welsh Governments involvement and that the Commission aren't distributors.
- [REDACTED] felt in his view confident this has been handed over and felt if the model he has suggested of a Levy Board consisting of Government departments this would provide greatest accountability over the system. Noting further discussions need to take place with DCMS as to the GC's role.
- [REDACTED] outlined that milestones are received from DCMS, and the intention is to consult before the summer on the Levy, including arrangements on implementation. At a headline level, felt there is a confidence that DCMS are leading on this and being in the public domain allows transparency.
- [REDACTED] felt it would be a good idea to pass the baton on and noted the importance of the mechanisms for how that is distributed, out of the hands of those gambling specific.
- [REDACTED] highlighted being careful as to how we fed into it, expecting us to be a recipient for regulatory research. Being careful what we say isn't self-interest.

[REDACTED] reflected on the initial part of the session as setting the scene, an exploratory conversation on the priorities and how ABSG can help and how these can be incorporated into ABSG's workplan.

Cross Selling and Remote game design

[REDACTED] recapped the four summer consultation topics and explained that the team are at the advanced stage of the thinking, building on the advice on the GAR:

- **Age related workstream in land based** – not proposing to talk to ABSG before consultation on this.
- **Financial risk** (previously known as affordability) – work is ongoing.

- **Consumer research** –the team are working with GC suppliers, i.e Yonder as to how consumers can be reached in a meaningful way (useful for ABSG’s input).
- **Cross selling** –proposing a new LCCP requirement to allow consumers greater control over direct marketing material they would receive, to help reduce complaints and reduce the risk of customers with a single product incentivized to gamble on multiple products. Where possible to be applied across remote and non-remote sectors.

ABSG’s views:

- █████ noted the benefit of approaching globally, rather than a subset of gambling.
- █████ queried what it would look like to give control to consumers in terms of their marketing. █████ explained how consumers must opt into marketing. There is already a requirement through the Information Commissioners Office (ICO) that you must opt in.
- Some ABSG members noted industry’s interpretation of guidance can be challenging and that there is a benefit to clearly describing the optimal format. █████ acknowledged this and highlighted there are lessons to be learnt from opt in marketing, where companies auto ticked and the ICO had to address this.
- █████ referred to direct consumer marketing that there is a strong trend to advertising online slots, doesn’t matter what customers originally started on.
- █████ asked if there is anything we can learn on the path industry has taken on gambling management tools? i.e things that are quite user friendly on the apps █████ highlighted that a lot of these projects interrelate. █████ felt this is a relatively simple proposal and highlighted the difficulties of being overly prescriptive.
- █████ cited the Digital Regulation Forum and that the challenges we see are not unique to gambling marketing. Referred to developments like Artificial Intelligence (AI) and in his view felt moving as a group of regulators is better.
- Commission colleagues talked about how principles of Remote Game Design can be explored with relevance to other products online. Highlighted that these are not issues the team anticipate getting firm answers on before the consultation. For those measures introduced on online slots, the team are clear on the evidence base. To inform the consultation, we are having to articulate what we know and information we have gathered. There is a need to explore the argument to ban auto slots and divergence on online and land-based products. Noting auto play is still an issue.

A question was raised regarding technical standards, and it was noted that we don’t go into each license type, to say you can or can’t have these features. However, acknowledging there is an argument you can set standard practices. Setting a standard that drives down to the minimum, meaningful speed for those individual products.

- The range and variability of gambling experiences
- Gambling-related harms and vulnerability
- The impact of operator practices
- Product characteristics and risks
- Illegal gambling and crime

█████ explained that outside these themes are some of the wider topics (evaluation, ethics, governance, research infrastructure). █████ talked about the evidence ecosystem and the GC's role in this, both contributing to the evidence base and receiving. The team recently mapped the six themes across their work and found that 90-95% of the team's work maps into the six themes. This enables the team to monitor their success by continuing to assess the state of the evidence base for each of the six evidence themes on a regular basis.

█████ explained that they look at the body of evidence across these themes, using principles around the GAR evidence assurance. The goal is seeing movement, a richer evidence base and having stronger answers to the questions we set out. Work we do will help our work in the ecosystem and horizon scanning will help with this. █████ noted this could be an area ABSG could also be helpful with. Particularly monitoring success - advice on ABSG's perception of how things are going would be helpful. Also, with the WP out, a lot of the ways these gaps are going to be filled is through evaluation and the team are on standby to see evaluation ramp up to the work they conduct. █████ and █████ recognised challenges in how evaluation of post WP actions is conducted. The team asked for ABSG's thoughts:

- █████ asked a number of questions about how the information will support the GC as a regulator. In particular, how some of the themes support how increasing evidence supports regulation? Noting the ideal scenario is that these gaps be filled, however questioned whether that is for the Commission to do? Secondly, █████ pointed to evaluation and whether this should be a focus, given all the changes in the WP, are they making any difference?

█████ responded on the first point and explained that all themes have originated from the three Licensing Objectives. █████ emphasised that the team could show the path as to how we regulate. However, reflected that maybe there is more we can do, especially stakeholder engagement. █████ noted a lot of time and effort spent on the WP and felt in her view this will cover a lot of the ground set out here. However, also emphasised having a balance with other obligations and statutory work to deliver upon, i.e National statistics.

- █████ noted the wider areas of research, i.e work around vulnerabilities, isn't in prevalence statistics type work and queried whether other organisations could cover. █████ highlighted that we have a dual purpose to be transparent about what's driving us, but also show others in the ecosystem if their doing research in these areas, how it will help evaluation (impact on the external message).
- █████ in her view, didn't think it was advisable for the themes to link back to the Licensing Objectives, noting clarity around regulatory purpose is important and linking the six themes back to this.
- █████ reflected on the recent Evidence conference and felt in her view, it appeared Operators were waiting to see what the Commission had to say, as that would influence their thinking. Noted that themes four and five are very explicit - looking at the way

products are put in the market and how that regulates to the regulatory purpose. Powerful message to the industry. Emphasised getting those meetings and conversations going.

██████████ outlined that we are looking for player level operator data and building on that. Recognising a key area to update on was the work of ROCD (Regular Collection of Operator Core Data).

- ██████████ reflected on the eco-system concept, but in his view noted the asymmetry means the GC will be impaired, as research community will be impaired. Noted solutions the Commission can put into place, to help it delivery and increase transparency - work with DMCS to come up with a framework around dysfunctions & video games. ██████████ noted parallels he also observes in his work - in the study of video games not having access to industry data, and there is no requisition power to obtain this. ██████████ foresees that the Commission will have more problems unless it reviews its role in the data ecosystem. Felt that the GC are data rich in that it is able to understand how much people are spending with individual operators. Emphasised that the team do not centralise the ability to analyse that data within the Research & Statistics team instead work with the community to open up data. Look at the Open Safely.
- ██████████ noted that the Open Safely project has been instrumental in obtaining data on who had covid from the NHS. Not from extracting data from NHS records but docking into NHS records and extracting what it needed. This is a novel way of gaining access to data, without going through the usual process of obtaining permissions.
- ██████████ summarised some takeaways from the conversation - that one of the options to deploy in ROCD is to look at how we can gain that data on a daily, weekly etc basis. ██████████ reflected that reviewing what infrastructure we need; feels the stage we are at. Also, after the conference working more with ██████████ is helpful.
- ██████████ queried the delay on the latest youth gambling data and commented on the benefits of making the data more available. ██████████ advised that it should soon be published and is our intention to make data more available, i.e we recently published all of the telephone survey data.
- ██████████ noted that the GC could provide a data service and police access rather than ad hoc data sets. Suggested UK data bank is where it's going. Similarly, ██████████ highlighted that Human Development Index is significant for health. ██████████ noted there is a similar archive that UK DATA provide, and it is worth the team bearing in mind.

Focus on the Gambling Survey for Great Britain

██████████ reflected on the journey and latest developments in the Gambling Survey for Great Britain (the new adult participation and prevalence survey). Started with a consultation in 2020 and piloted a new methodology. Now in Stage 2 - the experimental phase, involving testing and refining methodology. Dependent on the outcome of this, the team are looking to use this survey this year and onwards.

At a high level, ██████████ explained this is one high quality population survey for the whole of GB. The reason we went out for consultation was because data was coming from different sources, using different methodologies. The learning from the consultation was that this must be based on a robust random probability sample. Operating a push to web approach, but the pilot also showed a postal version was required. The survey will cover a large sample size (20,000pa). Also, new questions have been developed - updating gambling activity list and questions around

gambling related harms. The idea is that the survey will happen on a quarterly basis, with continual collection throughout the year. Data will be available through the archive and there is the ability to recontact participants.

██████ did emphasise the challenge a break in the trend data presents. ██████ acknowledged this and referred to the Youth Gambling Survey, where one year saw a spike in data upwards and reported the difference within the relevant paper, however noted concern that the nuance gets lost. ██████ noted ideally data is incomparable – a way you can run both methodologies, in a given time interval, showing we get x in the previous and how this translates into the new. Shows methodological changes.

██████ explained whilst doing the Gambling Survey for Great Britain, we are continuing with the telephone survey, in order to maintain our official statistics. Health survey data for 2021 just released noted the field work was really impacted by COVID and the methodology changed again.

██████ asked are you making room for data fusions? i.e health and financial records. ██████ noted ambitions to link to that in the future. The survey is in the field at the moment, we don't have an idea about how many people are willing to do it. Trying to get the survey right and thinking about data linkage. ██████ noted speaking to ██████ about this at a later date.

██████ highlighted that they could pilot that in some existing structures i.e Bradford project links routine data for 700,000 in the city. That having something at a local level, helps you to test against health care data for quite a large proportion of the data. ██████ recognised the GC are not likely to have the data to collect at that level.

██████ noted the sample is of 10,000 and secured budget to go further.

██████ asked would there be a conversation about a pilot with a Local Authority? The team noted once we have methodology tested and worked, it doesn't rule out doing a pilot. Including boosting in individual nations - the design we have would allow that to happen. ██████ reflected that it was amazing the team has started this and that it was a good step forward.

██████ highlighted the comms challenge this year - fast forward there will be data to compare too. ██████ outlined that whilst in the Experimental stage, they're testing different approaches to the gambling people take part in. Previous health surveys, there has been a long list of gambling activities. Noted a challenge with paper base and a recommendation from the experiment to stick with the long list but update activities.

Later found in Step 2 of the experiment, high non-response rates to Problem Gambling Severity Index (PGSI) questions, particularly amongst the long lists. Non-response was particularly high amongst those answering the paper questionnaires and those playing the National Lottery.

██████ outlined that she was concerned the PGSI scores might be inflated due to missing people that should complete the questions and if they did, they would have a PGSI score of 0. The postal questionnaire has been redesigned to improve flow and additional routing questions.

██████ was hopefully that this solves the issue, however noted if it doesn't, the team go to the next stage and live with the non-response.

Key questions for discussion (noting there is a separate session with ABSG members planned on 14th June to discuss these further):

- What level of non-response would be deemed acceptable?

- How concerned should we be if nonresponse is biased towards certain types of gambler?
- If non-response remains high what action could we take?

Initial views from ABSG:

- [REDACTED] queried how PGSI is reported. Noting non respondents are probably zero.
- [REDACTED] commented that lots of people don't identify as gamblers but do gamble. Also, that it was interesting that people don't answer the questions.
- [REDACTED] advised to explain the assumptions. You can assume zero but consider the most transparent way of doing that. [REDACTED] indicated there is a detailed paper on this and that the team are doing some modelling on this - if this stays high, and we assume they're all zero, what impact would that have.
- [REDACTED] suggested that you could ask everybody the PGSI at the beginning. Previous work has found that long surveys people get bored - if people say no, they can skip faster. Recommend trying and get as many people as possible to do. [REDACTED] acknowledged this and advised in Step 3 of the design; we ask about participation then PGSI.
- [REDACTED] queried as to whether you can force people to complete this question. [REDACTED] responded and noted difficulties with this, as the main problem is the paper based form.

Further discussion on this topic will resume when [REDACTED] meets with ABSG on 14th June 2023.

Item 7: Consumer Campaign – [REDACTED]

[REDACTED] introduced the session and asked members to introduce themselves to the Communications team.

[REDACTED] outlined the background context to the work around the Consumer Campaign, which primarily came about from a conversation between [REDACTED] & Andrew R, talking about misinformation and disinformation, that the Public didn't understand our role and remit. Felt it would be beneficial to do a public campaign, as to who we are and what we do, and to support this, conduct research to find the ideal sweet spot.

[REDACTED] outlined the timescales – looking to conduct work this finance year and launch the following 12-18 months. As part of the 'Alpha' discovery phase, this involves taking a step back and looking at what's out there - our remit as what we can say is narrow. It is also a crowded space. Referring to the Venn diagram (supplementary material provided on the day) and emphasised were not trying to cover all aspects within this campaign. This is an inaugural campaign and there are benefits in learning from ABSG to get a holistic view. Engaging with other stakeholders - pulling upon influences from LEAP also. Stamp our authority on gambling regulation in GB.

[REDACTED] introduced the first question for today:

- Why are we running a consumer-facing campaign?

[REDACTED] explained that he has been involved in analysing why some of the campaigns out there

haven't done what they set out to do. Putting that to one side, look today at what the Commissions role is as the regulator.

■ queried when people contact the Commission whether the narrative of that is that they expect the Commission to protect them? This messaging is how you protect yourself. The onus is on the individual. Struggling with that concept and the difficulties of 'protecting yourself', not able to access help for example and hope the Regulator would protect you.

■ responded and noted the volume of calls to the Contact Centre being, 'how can you help me?'. Recognised the difficulties in this space as an outcome-based regulator, we aren't prescriptive on the Licence Conditions and Codes of Practice (LCCP) - it is not on us to interpret the LCCP, unless there are clear signs, they have to follow the LCCP. ■ noted lots of detailed consumer complaints received against the LCCP. We can't look at personal issues, they get collated, as to whether they get sent through to compliance. There is no personal collection, we have closed the circle.

■ empathized that the communications perspective is hard to manage. For example, don't want to overplay 'protect yourself', might sound like we can only protect people who can protect themselves.

■ in her view, outlined that all regulators suffer similarly - people only need regulation when something goes wrong. The Commissions job is to provide information and messaging to as many audiences as possible.

■ noted it may be worse in gambling – it is a shame people are not as open, this presents difficulties in a comms perspective. In her view, ■ advised we need a Statutory Ombudsman and that the Commissions Contact Centre needs to focus on the here and now. In the absence of proper redress, seems to be about the information you can give, the form you can give it in and access through the website, as the focus.

■ also referred to the purpose of regulation, which is about protecting consumers, getting that message that you are protecting all consumers, not just those who can protect themselves.

■ referred to the Swedish authority's campaign last year about the role of regulation, which contained a clever way of explaining regulation and what it is for – small clips about playing games, not playing money and that a discussion about what rules were for, attracted good attention. They also took licence versus not licensed type of gambling, i.e if you stick to licensed, there are rules – questioned whether this could be a focus for this campaign? ■ acknowledged illegal gambling is something we could touch on carefully.

■ asked what are your highest hopes and worst fears? Imagine each of those has happened. Sending out a signal and clarity of what that message is, it's to give people agency. Not coming from a place of apology. We live in a lot of uncertainty; how can you feel that sense of agency? Not pretending everything is okay. How do you want people to feel? It's about agency in this transition, there is an Ombudsman - things are changing.

■ explained that her iteration is a campaign run in short bursts - test and iterate. Sophisticated approach not a market to all campaign and prime messages around target audience. Assess, adapt and move on.

█████ responded that is how you're doing it. Regardless of that, what's your vision of how you want things to be? Knowing you will pivot and change. How do you want customers to feel without being a, 'we're fix everything'? █████ in his view felt we could not afford to be defensive. Testing and interaction - is there a different conversation we can have, i.e drawing people who don't know about regulation into that conversation. To █████ point, agreeing we can't talk about individuals, it is the collective.

█████ emphasised being clear on your role and what you're trying to do and the messages you're looking to promote.

Second key question:

- "How can we run an effective consumer-facing campaign?"

█████ referred to a world of systems thinking - you can do the research, often a simple animation really works, bringing it back to essence. █████ noted she is using this a lot and finds it helps people relax as people can pretend, they understand things and this can help to demystify.

█████ reflected that it is hard when you have a spectrum of people - need a multi-pronged approach, as what people want to see is different. There will be people who engage with that well, or don't even look at things online. Noted the difficulty in the task and the issue of reaching people who may not be as accessible. Emphasised prioritising where to make the most difference.

█████ reflected on the Commissions website lacking in animation/pop up boxes. Noted that you could have a short animation of vision and strategy. Gambling is complicated, keeping messaging simple as can be, tailor made for a three second format that can be repeated on the website and advertisements. Highlighted that images in the pack (provided with papers for this session) are powerful and visual - something like that which repeats itself.

█████ touched on the notion of becoming recognisable and asked are you trying to focus on people that make contact with the website or whole population?

█████ questioned looking at those people who know a little bit about gambling who become more informed about their rights, or 44m or higher who might gamble. In her view pushing against society behavioral blockers, what would be the point? If customers just play lotto once a month. Those who have some knowledge might be quite interested, use the website as landing platform, if it was multi-channel - help with disinformation issue, core tag line, regardless of visual imagery.

█████ observed when looking at industry, there are implied themes i.e, enjoyable, play, fun, always about positive connotations. When it gets beyond fun, set a deposit limit. Talked about the benefits of regulated sites – minimize harms of gambling.

█████ noted in his view, you're specifying the things you think will improve - Gamble-aware allegedly thought it would improve things.

█████ asked how do you translate that? There is an enormous amount of complex thinking, we're trying to help to get to that point. The challenge is how you get from complex to simple; this is the image that will convey. █████ suggested you can build in strategy, user testing, building iterative steps for qualitative iteration for however planning will affect. Indicating the

impact if Gamble aware had done that properly when they published fun to fun. Baking in conservativeness could be helpful. █████ explained that the evidence suggests the fun tagline increases gambling - gambling is a risky, harmful activity, be careful with the language.

█████ referred to the Ontario example (handout given during the session) - what we're saying about the how, iterated and tested, it needs to be a clever simple message. Something that translates into a three second format, tactile spot out. Something that at the core is the message. The lessons around not giving the wrong message – don't follow what's been done before, the evidence shows that it has increased propensity to gambling.

█████ referred to the semantics, that we don't want to tell people what to do. How we speak to the audience, give them agency. █████ referred to the unlicensed operators and risks of that/the act of gambling i.e here is the risk of doing it with a lot of money.

Third key question:

- What are the outcomes we want to see?

█████ highlighted the importance of measuring success at the beginning. In his view, a whole lot of wastage would be avoided if a genuine test of 'when the fun stops, stop' had been conducted before hand. Looking at these campaigns afterwards, there is always the risk of somebody marking their own homework - 'When the fun stops, stop' as was assessed by industry. █████ advised design and evaluation by separate teams and as early as possible.

█████ asked is it also who and how they do it? Evaluation does need to be what's the variable and pinpoint. Who does the evaluation and how do you know you've been successful? How do you measure more informed consumers?

Reference was made to the work of the Gambling Survey and from this asking key questions - whether you feel industry is effectively regulated? Are you getting clarity on smart objectives across the campaign? What benchmarks exist and what are relevant to what you're trying to achieve? Would lay off the back end of how does the evaluation look. Until you know the essence, you can't necessarily know metrics and measures that you're trying to identify.

█████ noted that you can create items of factual understanding - perceptions, measure of behaviour, look at these systemically, certain ways of phrasing this. These can be quite cheap. Australia's previous 'gamble responsibly' messaging, is now an independently designed message. We're going to test new Australia messaging against 'take time to think'. █████ asked if there is an example of how it can be done, and █████ referred to limitations and cross sectional. Look at self-reports, more robust ones on actual behaviour.

█████ raised two points when it comes to evaluation - relevant metrics (referring to █████ earlier point) where 20 changes are happening around the same time, the Commission will need to know which changes are impacting what. Wonder about the cohort strategy that needs to sit on top of all the stuff the Commission is doing to selectively understand the impact of the things the Commission is doing - stagger in time, use event study. Interestingly physical spaces and online spaces, if you're interested in an uptake on the website, you can separate the website and can look at spatial interventions. █████ acknowledged this as a good point - want to evaluate the new things happening in the WP. If you're confident what you're putting out there is correct, you will

see how people access what you put out there. Like the Stop Smoking campaign. You want the evaluation of the thing that is helping them stop.

The group split into two and each discussed the following questions:

- What are the three most promising themes for a campaign?
- Why is the commission the right organisation to lead this?
- How will we know its successful?

Group 1

highlighted the challenge posed, as there is so much in terms of where we sit. We don't want to muddy the waters, something we can hold onto that is ours. Picked on the theme of the FCA's Crypto currency campaign, targeted more at younger people. An awareness campaign around regulation, i.e its wild west in terms of non-regulated sites as you could lose.

questioned the aim - is this to stop people getting to the point of harm? Or signposting how they can help themselves? Avoid terminology of 'safe', as different for different people. explained that it's about our remit, i.e 'we are here if you are experiencing this...'. queried some examples being - the Commission is here to help you stop; the Commission is here to help you to protect yourself. You want them to know how to protect themselves. highlighted that a big part of it is disinformation i.e Contact Centre calls we collect data wholesale and advise accordingly. asked is it focusing on everybody? I.e if you gamble, just be careful or is it going to people who gamble to stop?

raised about considering phrasing, i.e a 'flutter', the language is deliberate. Gambling carries risk, here is what the Commission does to keep you safe. You want people to find this.

highlighted you must pick out the aim. Know what you're offering them, what is the help, where are you sending them, is there help that is going to work for them? likened this to domestic abuse or violence campaigns which people recognise. Information in the Licensing Objectives are clues.

likened it to regulation of Ofwat – effectively what gets people attention is saving money. We need to find our version of this. asked what is the help you do? highlighted unlicensed spaces – gap in the knowledge. referred to unlicensed websites – consider where you can help, is it particular areas? Difference between unlicensed operator and licensed operator.

Three most promising themes

- Good & bad practice
- We are here to protect you
- Illegal gambling (risks of black market)
- Bad practices – delayed withdrawals, inducement, cross selling, illegal sites
- SRA digital badge
- Three second format
- Trust people have in the Commission – look at relevant case studies.

Also, noted may be a helpful individual to pick up with around this topic.

Why GC to lead?

- Statutory regulator – as the regulator signpost to other campaigns.’ If you have a problem, this is where you go.’
- Has the power to act.

How will it be successful?

- Measure number of hits on the website
- GC reputation improves
- Misinformation decreased
- Microsite.

Reflections shared by Group 2

initially outlined one theme that was promising - ‘Gambling is regulated to control the risks inherent to gambling’ – identify that it is not your average leisure activity, i.e could lead to addiction. Ruling out focusing on harm and addiction, take the Commission into a space where we are pitching against the industry, avoiding getting into a conversation of pro and anti-gambling and treading on other toes.

The second theme - black markets, target particular groups who are susceptible, i.e people self-excluding. Signpost role of the Commission - why is the GC delivering these messages.

The Group considered why is it so hard to find the problem we are trying to solve?

- in her view noted, surely as the role as a regulator, you have a role in signposting, don’t think that is too controversial.
- felt this feels different to a comms campaign.
- asked with respect to signposting would we proactively launch a campaign?
- talked about focusing on what the Commission is there for, it has a duty, but not the main aim to signpost. People are not going to come to the Commission for treatment.

From the ideas suggested by both groups, the key reflections were:

- felt that the vision statement was so close to the word ‘safe’.
- not sure that’s the most important message that gambling is ‘well regulated’.
- highlighted that gambling carries risk and that both groups made the same first point, which is reflective of independent convergent.
- outlined the notion of ‘we the regulator, here to protect you’ - shut down illegal sites, the evidence shows that these are bad things (delayed withdrawals etc..), that’s our job. Then we act, and we do positive work i.e fines. The reason you do it is you are the statutory regulator and have the power to act.
- commented that you can only communicate if there is a reason to do that and you want people to see that. Felt it was only really the illegal gambling sides where the Commission can help. The other items don’t feel that they fall into the Commissions remit.
- felt the Commission needed to be careful that it’s not opening itself up to push back.

- ██████ remarked on the publication of the WP and hopes for an Ombudsman & Statutory Levy. Emphasised having courage and putting some momentum behind this.
- ██████ asked, "is it the right time? In contrast, ██████ felt there was never going to be a time when it gets calmer.
- ██████ asked whether the group could think of a regulator where that doesn't apply to – in her view regulators are only ever known for their failures and not their successes. Does that mean that you don't do anything? Safer to stay under the radar? Echoed ██████ views - be much bolder.
- ██████ commented that there must be complete confidence that everything in the WP is going to happen. ██████ noted particularly with the Ombudsman, still think we're a long way off, risky stage to say we think this will happen. Might be easier after consultation, i.e if you have a problem, this is where you go for x. Shines a light on the problem and offers a solution.
- ██████ noted that she was not suggesting we put language around WP and what this contains. Something about surveying the landscape - the signs look good, creating narrative if there is a clarity where the Commission stands now to its public facing audience. Create a narrative ahead of what you would hope would come.
- ██████ felt that we had waited and noticed others began to fill the void, resulting in misinformation coming through. No one keeping them apart and consequently anger targeted at the Commission. What we have to say is appropriate for the position that we hold.
- ██████ noted that it depends on who is saying it. To which ██████ felt there was something in this about moral compass.
- ██████ asked if the message is 'were here to protect you', what is the message you want customers to do in response?
- ██████ commented that some of what you're talking about might not be in your remit. Felt the point of a communications campaign is to get information out and think about who. There has to be a point of the messaging – saying we 'might' get an ombudsman, the campaign has to be facts, as people take it literally.
- ██████ asked if it isn't here to protect the public, what is it here to do? Protects the public, crime, fairness, vulnerability – all about a protector.
- ██████ asked what bit of that can you get in a communications strategy, what part and why? ██████ referred to building trust.
- ██████ noted the Commission is to ensure the gambling market is overlooked, in contrast to illegal sites and bad practice. To which ██████ commented there were benefits of showing how an operator is legal.
- In contrast, ██████ noted difficulties in this approach as an Operator could jump on that marketing also, to further encourage gambling on a legal site.
- ██████ asked what else can you expect consumers to act on, what other areas of regulation can you help them with?

██████ and ██████ brought the session to a close. ██████ thanked colleagues for their time and signposted next steps. The team are hoping to engage with other stakeholders, including LEAP. We have given ourselves a year to think about this campaign, if we don't do it right it is bound to fail. What we find we might not need is a campaign, but a website update.

██████ thanked all colleagues for their time and contributions over the past few days.

ABSG Meeting 14 June 2023 10-11am

Present: Anna Van Der Gaag (AVG) (Chair), Jane West (JW), Stephen Sharman (SS), Ulla Romild (UR), Tim Livesley (TL), Abigail Down (Notes)

In attendance: Helen Bryce (Head of Statistics)

Gambling Survey for Great Britain

█████ welcomed attendees to the meeting.

█████ recapped the discussion that took place in May between ABSG and the Research and Statistics team on the development of the Gambling Survey for Great Britain. The project is currently in the experimental phase (Stage 2). The step 2 experiment within this stage focused on the best way of collecting gambling participation data, comprised of three approaches. In this experiment, a high non-response rate to the Problem Gambling Severity Index (PGSI) questions was identified. In particular, for the long list approach which was the recommended approach going forward. The concern is that the non-response rate is concentrated amongst postal respondents, who tend to be older and National Lottery players only. █████ explained that the survey has been re-designed in Step 3 of the experiment and field work has just finished. The re-design focused on strengthening the routing flow of the questionnaire and strengthening wording so that even if a respondent thought the PGSI wasn't relevant to them, they were reminded to complete the relevant questions. █████ was hopeful that the redesign of the questionnaire will fix the problem.

The level of non-response observed in PGSI questions in Step 2 of the experiment for all respondents (gamblers and non-gamblers) was 7%. The non-response rate increased amongst past 12 month gamblers who completed the postal questionnaire to 38%. █████ noted that it would be useful to get ABSG's opinion on an acceptable level of non-response in preparation for Step 3 results.

Key questions for discussion:

1. What level of non-response to the PGSI is acceptable?

█████ advised she would not be concerned if the overall level of non-response to the PGSI was below 10%. █████ highlighted that respondents who just buy lottery tickets are less likely to have gambling problems and asked if you look at those respondents that only gamble on lottery tickets, do you get any scores on PGSI? █████ clarified that there weren't many. █████ noted that in Sweden, they would make the assumption that respondents that only buy lottery tickets would not score anyway and assume a score of 0. Those who gamble on other types of games it is more difficult to assume.

█████ asked what level of non-response is usual for a gambling survey? Do you have equivalent data for prevalence surveys, and can you access that data broken down, as to groups and delivery methodology?

█████ explained that the Health survey overall non-response rate is typically 5%. █████ worked on development of the British Gambling Prevalence Survey (BGPS) and looked at some modelling where zero was input for lottery players - would need to check on the extent of the issue previously.

█████ agreed with █████ perspective, that the subset who have not responded is less concerning. In particular noted that Lottery players may not see that they are experiencing any harm. █████ observed that it was interesting that people don't fill this in and that it is worthy of reporting this - you can hypothesise why you think that might be or do a small project with those where non-response is concentrated.

█████ noted that this issue wasn't observed in Step 1, as the participation question hadn't been changed. In Step 2, we asked for past 12 months and past 4 weeks gambling activity - the questions and routing became more complex. The re-design of the questionnaire at Step 3 contains questions on gambling activity in the past 12 months earlier and the past 4 weeks further down.

█████ suggested that the team could validate what they find on this by using a big cohort to get a better understanding of why participants don't fill that in.

█████ emphasised that there should be transparency in the approach taken, for example in the footnotes. █████ referenced Public Health England's (PHE) papers on 'Gambling-related harms: evidence Review' and in particular the [Quantity harms paper](#). █████ noted the importance of referring to evidence obtained and explaining any assumptions made. As the overall non-response rate is low, this needs an explanatory note, as it can tell the reader more about the demographics of respondents.

█████ noted that there is difference between research and a survey gathering information. She felt it was positive that NatCen were leading on this, as they will have a lot of expertise and hopefully support to improve the response rate. █████ commented that next step is to write the technical reports that will go alongside the publication of the statistics. She advised that the strengths and limitations of the approach are really clear, and it is about being open and transparent around this.

█████ explained that she recently proof-read the new report from the Norwegian National Gambling Survey, who included zero response rate in their reporting. █████ sees this as better than leaving as no value, as you risk getting an inflated measure. █████ reflected on surveys from some years back when those answering postal questionnaires were more 'hard-to-get' respondents that typically also are problem gamblers to a higher extent. Using web surveys as a primary method you are more likely to catch online gamblers and probably also quite a few problem gamblers. Respondents from postal questionnaires nowadays are therefore a different category, often older and not online. Therefore, it is difficult to compare with previous studies.

█████ noted that there is a higher Problem Gambling (PG) rate amongst online respondents, as the typical demographic of paper respondents is lottery only players. If this was an online survey only, we could rely on routing. However, as the level of paper respondents remain at 40%, we have to offer a postal survey.

█████ asked, do you have a comparable group of older people from the paper survey who are lottery players who did fill in the PGSI questions? even if this is a small group, but they all scored zero that adds weight to the rationale to recode as zero those who didn't. █████ explained that there are some responses that would give us the evidence to recode the others as zero.

█████ asked how this will land? In terms of including non-responses and the reducing impact on the overall PGSI rate. █████ felt that people may be particularly interested in these results in the context of the White Paper reforms and that the messaging needs to be clearly communicated to show what the data is saying, i.e what is online data saying. █████

acknowledged the need for a postal questionnaire, recognising this was mainly an older demographic who may be National Lottery players and emphasised the need to have both those subsets clearly reported.

█ agreed with █ point, that the differences and characteristics of those who complete a postal questionnaire is important to report on. By splitting out the postal and online responses will prevent diluting what you see in online reporting as one.

█ explained that this is up for discussion over the summer once Step 3 results are received. There will need to be a headline statistic overall which reflects the PG rate regardless of mode of completion. Supplementary analysis will be published which could be split by mode of completion of the survey, how respondents have told us they gamble i.e giving a PG rate for respondents who gamble online. The new survey breaks down the PG rates by activity.

█ noted that gambling related harm could look a lot less when including all those people. █ acknowledged this, however noted that for the purpose of Official Statistics, headline statistics will need to be defined. Recognising that what sits underneath this shows that rates differ against activities and demographics.

█ asked whether the overall headline figure that a report might lead with, would include non-gamblers? As that would dilute the prevalence of harm identification.

█ agreed with this and noted that at the recent Evidence Conference in March, it was positioned to stakeholders that there is a break in the trend because of the new methodology and that this is a good opportunity to communicate the findings. One suggestion is that we report the PGSI amongst people who have gambled in the last 12 months, rather than amongst the whole population which includes non-gamblers. Noting there were differing opinions on this. Once data is received at Step 3, we can look at ways of showing the information and get advice on this from various stakeholders.

█ reflected that online and not online are two different angles and that should be the methodological thing to present. Secondly, types of gambling online or not online. █ in her view, still thinks that the PGSI number for total of the population is relevant – it shows underlying need for treatment based on society and ideally you would want to report on both.

█ highlighted that, in the event of a needs assessment the more relevant number/ratio is the within population ratio which would show the range of severity, and the range of services which might be needed, from fairy light touch to potentially very costly interventions. █ noted that the within population figure is important and suggested saying something at a more granular level in the explanatory note on the data. In her view, you would want to be publishing both (within – gamblers only data & whole population – gamblers & non gamblers) – within population maybe as the headline.

█ highlighted that if you transfer percentage to number of individuals, there is more of an argument.

2. If the Step 3 questionnaire re-design does not reduce the non-response amongst postal survey respondents, what action should we take?

- Pause the progression to the official statistics mainstage survey while we investigate this issue and consider alternatives

- Go ahead with the official statistics mainstage survey and leave the non-response as it is?
- Go ahead with the mainstage survey and change the PGSI score for lottery only players from 'non-response' to 0? (attached modelling sent with papers ahead of the meeting shows impact of doing this)

There was consensus amongst ABSG that the third option is appropriate action to take. █████ advised that they have experimented with recoding lottery only players as zero and this didn't make much of an impact on PGSI rate.

3. Communication around action we take and how to handle this

█████ reflected on the conversation and asked is it just being open & transparent about the problem?

- █████ thought this was the case and suggested NatCen might be able to help with this.
- █████ saw this as a strength - if you are transparent no one can accuse you of inflating numbers.
- █████ reflected on the references made to established surveys in other jurisdictions and in England including Sweden, Norway, the Health Survey and PHE who have followed a similar methodological response.

4. Anything else we should take into consideration?

- █████ noted if the team are still concerned at the end of this process, they could follow up with a sub-group of those who did not answer the questions. Also, noting that there was something similar in Sweden. █████ confirmed this was built into the survey and suggested they could also contact some of those who have not responded, to understand why and ask them to complete.
- █████ explained that the results collected are methodologically driven. Step 3 field results are a dry run of the first set of Official Statistics - 4000 responses were collected. Initially there will be some lead statistics, then after the first year once when the sample size is increased to 20,000 respondents, there is the opportunity to drill down into different subgroups.
- █████ reiterated the importance of a fully explanatory note and being able to explain what your reference points are. Suggested working with the Communications team on lines.

█████ outlined that in 12 months' time talking about trends will be easier, with the focus on this questionnaire being different and therefore making it easier not to compare to previous surveys.

█████ reflected that she had found the session really useful, thanked everybody for their contributions and would be in touch with next steps over the summer. This is likely to focus on how the findings are presented when published.

ABSG Meeting 13 July 2023 9.30-13:00

Attendees: Anna van der Gaag (Chair), Cath Cooney (CC), Philip Newall (PN), Ulla Romild (UR), Jane West (JW), Stephen Sharman (SS) & David Zandle (DZ)

In attendance: [REDACTED]

Item 1: Welcome, apologies and declarations of interest

[REDACTED] welcomed attendees to the meeting. There were no apologies noted.

There were no new Declarations of interest (DOI's).

Members noted a preference to move back to Zoom meetings.

Action: [REDACTED] to explore whether meetings can be returned to zoom.

Item 2: Minutes and matters arising from May 2023

[REDACTED] thanked [REDACTED] for the work completed on the minutes to date. Minutes were retrospectively approved for, 16 November 2022, 19 January 2023 and 24-25 May 2023.

Action: [REDACTED] to co-ordinate with Digital to ensure the website is up to date for meeting dates and minutes from 2022-2023.

ABSG members raised concerns over the different approach taken to the informal note circulated and the formal published minute. [REDACTED] in particular noted the lack of detail in the published minute, which was in parallel to the level of detail contained in the agenda.

[REDACTED] briefly explained the different approach taken to produce the formal published minute and detailed notes circulated. ABSG's formal minute has tended to be a shorter note, broadly outlining the work ABSG is involved with, whilst the detailed note is circulated with colleagues internally (including ABSG members). [REDACTED] outlined that ABSG's role is to provide advice to the Commission (GC), whilst decision making sits with the Board, where there is a suitable level of transparency in place, with published board minutes.

[REDACTED] talked about striking the right balance and looking at what type of conversation/engagement were trying to achieve with colleagues and that which allows the most value into our work. [REDACTED] noted [REDACTED] feedback and considered reaching a compromise by reviewing the level of detail contained within the published minute, whilst also confirming that ABSG's advice reaches Board, where decisions are taken.

[REDACTED] raised how information is shared with members and asked how to best access this. [REDACTED] explained that documentation has been shared password protected on this occasion and this is part of looking at how information is shared in a more secure way.

[REDACTED] highlighted that the DOI's on the website remain out of date.

Action: [REDACTED] & [REDACTED] to look at reviewing the informal notes/formal minute process. [REDACTED] to ensure members DOI's on the website are updated as soon as possible.

Item 3: Chairs Report

[REDACTED] introduced the Chairs report and highlighted key points, focused on the reforms outlined in the White Paper. In particular, [REDACTED] noted [REDACTED] blog raised helpful points on the Statutory Levy and DCMS's responsibility. Highlighting that external stakeholders have

raised concerns over the timetable for the Levy and that there is anxiety about how this could work.

█ opened up to members to reflect on any meetings they had attended:

- █ attended the International Think Tank on Gambling Research Practice and Policy. He noted that following the event, a report will follow to all members of the Think Tank with a number of action points for major topic areas, which █ will share further details of once received.
- █ reflected on the benefit of networking and how this helps with work at the GC and █ noted the papers on the Think Tank and PSA Conference were helpful.
- █ highlighted that in supporting the GC to become more data focused, he has been working on a paper looking at where the GC can get more useful granular data. Noted the breadth of the open eco-system of data when it comes to advertising.

Item 4: ABSG input to Gambling Act Review (GAR) deliverables

█ thanked members for completing the GAR deliverable spreadsheet to indicate their interests/experience against relevant GC/DCMS led deliverables. █ explained that the summary of priorities will be used in discussions with the team leading the GAR. The exercise was not so focused on chronological conversations, but which elements ABSG can contribute to either as a group or individually. █ summarised the deliverables receiving most votes as priority for engagement and from those highlighted specific deliverables:

Anonymised regulatory data to be made available to researchers - █ outlined in his view that this area of work is an example of the GC receiving endorsement for better capacity to deliver better data. It also presents an opportunity to make data more available to the academic community. Emphasised the importance of harnessing skills set of academics. Two particular projects in the plan are important to this:

- The **Regulatory Returns Project** (collects aggregate data on Operators). Data is currently collected through an out of date system and work is being undertaken to look at what this data consists of. The project is to modernise how we draw core data, to be more fit for purpose and reviewing why we're asking for this data.

- █

█ noted in her view, that the Data Repository idea is key to promote transparency, for example the gambling survey telephone data which the GC already shares. █ expressed that it would be sensible to map this in early on, to know what data to share and in what format, citing the UK Data Service Repository as a good starting point. █ suggested looking at what best practice is elsewhere and assessing how it relates to the challenges faced and the problems to be solved on data.

█ noted that the Swedish Gambling Authority gather data from Operators not as frequently █ noted that agreeing definitions of what should be reported is challenging and the GC may be able to learn from their work.

GC to commission more research relevant to regulation - █ commented on the collaborative work between the Research and Statistics team and ABSG recently. Highlighted that the Levy is not in the GC's remit to lead on, but that it is likely to give input to how this might look and recognised ABSG's keen interest in this area.

Single Customer View live trials underway – [REDACTED] flagged the importance of engaging with Advisory Groups on how to evaluate and react to what the Betting and Gaming Council (BCG) is delivering upon.

Remote Game Design – Policy development have traditionally engaged with ABSG.

Improvements to player centric tools (e.g opt-out limits) – On the agenda to discuss at ABSG's September's meeting.

Universal stake limits for online slots and lower limit for age 18-24 (DCMS priority) – The White Paper (WP) covers the details on this and DCMS are consulting on the levels set out. [REDACTED] asked whether there are further views on this topic. [REDACTED] highlighted that he had recently gave evidence to the Gambling Related Harm All Party Parliamentary Group (APPG) about the evidence base linked to online slots. At which, [REDACTED] provided his point of view that Operators should reduce the speed and ease of gambling. Furthermore, that further education across speed of play across online gambling products, could help reduce harm more broadly opposed to bet limits. [REDACTED] noted keeping ABSG up to speed on this and feeding ABSG's views into the consultation at the appropriate time.

Financial risks – Likely second phase of consultations.

Published vulnerability statement – [REDACTED] noted the published vulnerability statement was due imminently - asked to be involved and timetable for that.

Action: [REDACTED] to contact Research & Policy colleagues re the vulnerability statement and speak to [REDACTED] on where ABSG can input to GAR implementation work.

[REDACTED] reflected on the huge amount of work and a clearer picture as to where and when to involve ABSG in the GAR deliverable work. Highlighted ongoing discussions, particularly around the Evidence Gaps and Priorities programme. [REDACTED] noted that for July's consultations, ABSG's advice has been taken on board and it is now thinking about future consultations.

ABSG members saw the value of completing this analysis. [REDACTED] asked to be kept up to date with progress. [REDACTED] asked members to consider evidence relevant to the consultation topics, and based upon the evidence, questions for stakeholders.

Item 5: GAR implementation – Socially Responsible Incentives

[REDACTED] welcome [REDACTED] to the meeting.

[REDACTED] opened the session by giving some broad context around a number of initiatives led by the GC on the GAR. Highlighting some of the key areas from GC advice, based on evidence submitted by Advisory Groups:

- Reforms on reducing consumer exposure to online advertising. Including, new rules that came into place as to advertisements not having strong appeal to under 18's (U18's).
- Limiting the frequency and amount of advertisements in elite football stadiums – yet to see how that might emerge and possible scope for voluntary agreements in that space.
- Work with Social Media platforms to do more with U18's being exposed and interaction with gambling advertisements. ASA have worked closely with those platforms, and this is ongoing work.
- The main project is ensuring incentives are Socially Responsible. Other work has also taken place on Customer Interaction Requirements related to bonuses. In February, Operators were required to cease sending any bonuses/incentives to those displaying strong indicators of harm. Work is ongoing at looking at a way to evaluate

the effectiveness of this through compliance activity.

█ briefly recapped on the consultations due in the next 12 months. In particular, the Cross Selling consultation is launching in July, which allows consumers powers to opt out based on type of gambling and the format in which advertising is sent. █ explained that the general programme of work viewed together gives overall impact on consumers. GC has asked Yonder (market research company) to help with how consumers engage with and understand bonus offers and the methodology around this. █ explained that qualitative and quantitative studies will help with evaluation base lining.

Opened up for ABSG's views:

- █ highlighted the importance of establishing the qualitative approach in respect of mitigating established biases. Further explained that any financial inducement has a value and historically in online gambling, inducements held a lot of value. Play through requirements set the cost of getting that bonus. T&C's can make the inducements less valuable.
- In response to █ point, █ asked whether Yonder's methodology could present risks to missing this? What is possible to win in real terms could be less valuable.
- █ to connect █ with an Australian colleague who specialises on this topic.
- █ reflected on the challenge of defining 'Social Responsibility' and those who are 'vulnerable'. She raised concerns that this is being viewed on an individual level and may not be able to equip everybody with the knowledge of what's happening when they place a bet. █ recommended a population level approach to protect the consumer, i.e looking at how disadvantaged areas are targeted.
- █ noted Yonder will look at what an average gambling consumer looks like. █ suggested that Yonder could speak to █ and █ for further advice.

Action: █ asked that examples (inc research papers) of where population level initiatives have been successful and how these have been evaluated are emailed to █

█ shared - [All bets aren't off when it comes to football and its obsession with gambling | Football | The Guardian](#)

█ shared - Sugar tax leading to industry reducing sugar in their products: [Changes in soft drinks purchased by British households associated with the UK soft drinks industry levy: controlled interrupted time series analysis | The BMJ](#)

- █ reflected on the construction of the incentives and what would and wouldn't be captured in qualitative research. He explained that some incentives are structured based on time pressure and a sense of urgency, some of which isn't allowed, for example boosted odds in sport, which can give an implied pressure to bet. █ noted that she would take this away.
- █ reflected on a lack of consumer understanding around the costs of an inducement. Highlighted that Yonder may be able to help assess if the GC are asking for the right granular detail.
- █ asked whether consumers have the knowledge to achieve an offer? █ responded that the ASA look at advertising and how it is constructed. If changes are made to the way in which an offer is constructed, the ASA ensure the advertising is responsible. █ noted a concerning example where an Operators offer led a gambler to gamble more, which triggered off warnings around safer gambling.
- █ reflected on the benefits of sharing anonymised examples to demonstrate poor industry practices.

- [REDACTED] suggested to look at alcohol minimum pricing work - The Lancet April 2023 - [Evaluating the impact of alcohol minimum unit pricing on deaths and hospitalisations in Scotland: a controlled interrupted time series study - The Lancet](#)

[REDACTED] rejoined the meeting and [REDACTED] summarised the discussion so far.

Key questions for discussion:

a) How do we regulate incentives more effectively to ensure they are delivered in a socially responsible manner?

- [REDACTED] noted only new customer offers are permitted in Sweden, which presents a problem as people who want to gamble frequently, move between Operators, which also affects Operators retaining customers. [REDACTED] suggested in her view, a solution would be to not allow any bonuses. [REDACTED] flagged that this is an area of interest, looking at the difference between new and existing customers - as to whether there is evidence to suggest the two need to be different.
- [REDACTED] noted if the GC was going to become radically data driven, there is a way to do regulation top down rules and bottom up looking at behaviours, to enable a data driven cut off.
- [REDACTED] noted random checks on Operators algorithms is an important part of the solution. [REDACTED] noted considering this as part of pre consultation guidance.

b) How do we increase consumer knowledge and understanding of incentives? For example, do customers have the knowledge to judge the achievability of an offer?

- [REDACTED] suggested looking at this from an actuarial perspective to establish true long term value (referenced the work of [REDACTED]). [REDACTED] noted that the concept of cash out is marketing, not an inducement, but does present a similar issue with an implied cost of cash out. Also, noting that this can offer less value than hedging the bet out. [REDACTED] reflected on whether it is achievable to mandate a warning label, to show the independent calculated value of the inducement, i.e showing a high play through value. Noted the actuarial approach can be used to show which complex T&Cs reduce the true value of the inducement the most.
- [REDACTED] asked is there a way of challenging the legal language and accessibility within the T&C's? [REDACTED] acknowledged this as work in progress. Discussion referred to previous CMA work presenting T&C's in simple to understand ways. However, noted these can still be confusing. The FCA have done something around promotional offers.
- [REDACTED] was of the view that most people have a lay understanding of gambling, and unsure whether it is helpful to increase knowledge of complex processes among a large group of people.
- [REDACTED] referred back to Think Tank thinking – raising awareness of the likelihood of winning, rather than losing. Highlighted the FCA fairness test – holding Operators to account as they do in Financial Services. Asking is it the job of the Operator to simplify their incentives? What are the things that should be stopped?
- [REDACTED] cited difficulties in not having full access to data in the data community. Considered the approach to regulation and keen on the idea of the GC leading data-driven audits – for example if a certain % of individuals who receive incentives are going on to develop problems, debt, having to self-exclude, the Operators are held to account. If the GC wants to regulate top-down instead, then either this evidence is generated internally or if the GC does not have the capacity, it could consider opening up the data to the distributed research community which is academia.

- [REDACTED] noted the FCA are using understandability audits over financial products.
- [REDACTED] in her view, felt more population level intervention, more protection of at risk gamblers, more interrogation of data in order to get underneath Operator practices. [REDACTED] reflected there is an option to be more prescriptive with this work. Noted room for movement in terms of the extremes for options we have.

[REDACTED] summarised the session and asked members to send over any examples of use of incentives and thoughts around defining 'Socially Responsible'. Consider what are the probable outcomes from any new regulations and evidence that relates to that. [REDACTED] flagged possible consultation questions to consider:

- Which groups should always be excluded from receiving bonus offers/incentives to gamble? (under 18s? 18-25 year olds? At risk gamblers? Self-excluded gamblers?)
 - Which online games should remove all bonuses/incentives for all customers? Online slots? Online casino games? Online poker?
 - Should GC be permitted to carry out secure random checks on the use of operator algorithms with 18-25 year olds and self-excluded customers?
 - Should cash-back on losses be banned? For all customers?
 - Should operators offer real time information on wins and losses to online customers?
 - Should terms and conditions specify how much of a customer's own money is required prior to obtaining bonus/incentive?
 - Should all online products have return to player ratios?
- [REDACTED] asked how research is commissioned post WP? Highlighted the tension of wanting knowledge from the Academic community, but this community not being able to access the data for which assists this.
 - [REDACTED] noted there is an exercise to go through on what data is available/defining that. Also, a conversation to be had on what is feasible to deliver upon now and that further down the line. [REDACTED] suggested an exercise involving [REDACTED] and [REDACTED] looking at the data already available and what we could get.

[REDACTED] thanked [REDACTED] for joining. [REDACTED] reflected how helpful this session was. Noted this summer is focused on pre-engagement with Advisory Groups, informal discussions with the industry, possible session with Operators in September and hoping to consult on proposals on November. [REDACTED] will keep ABSG up to date and share findings from Yonder research.

Item 6: Data Update

[REDACTED] introduced the data project and highlighted that this is in early stages of development and hasn't been shared widely across the GC yet. [REDACTED] outlined the work happening now, what the GC are hoping to achieve and how this work can be used to fill priority gaps. Including the North Star vision for the project and what this means in practice. Alongside, the Plan on a page, where we will be in six months and two year vision – realising the 'North Star'. Key points noted:

- There are three pilot projects and ABSG could help to identify the pipeline of activities. In particular, the Evidence Gaps and Priorities Programme is a good useful reference point as to questions the GC want to answer, that are right for data sets.
- [REDACTED] reflected on increased confidence in core datasets – building a world leading approach. Cited two important events - the launch of the Great British Gambling Survey and improving collection of aggregate Regulatory Returns data.

- Two year vision – Realising the ‘North Star’ - need better data governance.
- Developing Core Skills and culture - talking to commercial services about procurements services. Prioritised the improvements to be made and getting a core team in place, including a handover for developing capacity for Digital Advisory Panel (DAP).
- Connecting with other Regulators and possible learnings from this. Particularly the ASA, who have a built a foundation team and allowing greater capacity of an in-house team.
- Pilot projects – Generating data driven insights. █████ noted a collaboration with Warwick Business School, building on the work █████ was involved in on banking data. Also, that █████ is providing consultancy work on looking at data around the black market, how big this is and type of spend.

█████ noted building on the vision, as to the benefits associated with better data.

Action: █████ to share the North Star document and members to provide any feedback.

█████ sought ABSG’s views on material presented and next steps:

- █████ liked the way in which the Overall strategy was presented from short to long term.
- █████ felt this was an impressive document, showing roadmaps and iterative building. However, in his view suggested it could go further to integrate data into the activities of Regulators – didn’t see anything on data that could be on behavioural interventions. Secondly, noted there isn’t a concrete plan for intervention, i.e what is the journey to getting to the two year plan. Cited the NHS as a good example in this arena.

Action: █████ to follow up with █████ on the overall strategy.

- █████ cited the Evidence Gaps and Priorities programme and suggested if there is a key priority gap observed, the GC can look to see how data solutions would help tackle that problem.
- █████ noted ad tech algorithmics was an obvious pilot to assess if the industry is compliant in not offering incentives to self-excluded customers. Linked to the Evidence themes work, specifically the impact of Operator practices. █████ felt that data sources could easily be used to investigate that.

Item 7: AOB

Nothing raised

ABSG Meeting 1 September 2023

Topic Core data collections – Building blocks for KPIs

Attendees: Cath Cooney (CC), Anna Van der Gagg (AVDG, Chair), Steve Sharman (SS) and David Zendle (DZ)

In attendance: Jason Davies (JD), Tim Livesley (TL) and Abigail Down (notes)

Welcome

Members introduced themselves and gave a brief outline of their role.

ABSG members were given an overview of existing data collections, which included:

- Reg Returns and Industry Stats (a core data set) – consisting of Operator data, data gathered quarterly/annually. A Commission working group is looking at streamlining this, as there are over 1000 questions. Intended Operator engagement and consultation, recognising the landscape has changed, i.e GAR review, may be new questions we want to ask.
- Other data sources – Licensing applications, Key events, Market impact data etc.
- Experimental stats – [REDACTED] and YouGov finance.
- Research/Surveys – Gambling Survey for Great Britain (GSGB), Consumer Voice Young People's Survey.

An overview was given of each data collection:

Regulatory returns and Industry Stats

ABSG received an overview of the key categories of data collected underneath Regulatory Returns currently. For example, these tend to be focused on Gross Gambling Yield (GGY), data is received at a very granular level for all types of betting, games etc. Questions also ask about workforce numbers, number of premises, customer interactions, disputes, self-exclusions, contributions to gambling harm charities etc.

ABSG were advised that this data is not consistently received across all operators. There is not a full data set with a high degree of confidence in the quality of that data. Part of the improvement project and working group, will look at the quality of data, how to cut out the unnecessary, superfluous data that is received from Operators. The heart of the quality issues in some cases is non submissions from Operators and in other instances submissions that do not appear quite right - may be due to the nature of being built up into a huge data set. There are thousands of Operators and thousands of questions. The Research and Statistics team (R&S) is trying to update and streamline the data. Official Industry stats published in

November are based on Regulatory returns. Returns are submitted based on when the licence is granted, and data is harmonised based on when they are submitted. Very little of the data goes into the published industry stats.

ABSG raised the following points/questions on this data collection:

- If there are 1000 questions and c2700 operators would that mean only 25% of the data is used?
- Is there another published date in addition to Industry Stats?
- On key metrics is there anything around distribution? In respect of GGY does the Commission measure how that revenue is measured across the customer base? This could identify operators whose revenues are based on small percentiles of players.

In response, ABSG were advised that some Operators only see a fraction of questions and data is used internally - some may not inform Industry Stats but could inform key performance indicators. There is the ability to broadly drill into the Operator data. However, can't marry that together with customers playing across operators.

Experimental Statistics

YouGov Finance Data

ABSG were given a brief overview of the work the Research & Statistics team is conducting with YouGov Finance data - essentially open banking data (transaction details) for 4000 individuals (anonymised bank account statements). Includes demographic information, i.e age, region, location, household income and survey responses on risk attitudes. Data includes all deposits and withdrawals from gambling in the context of an individual's other bank data. Analysis has only just begun.

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Direction of travel for research

ABSG were informed that historically a lot of consumer research and consumer voice has been used. The GSGB is beginning to get to a single source of data. Beyond this, Yonder was commissioned by the Commission to help develop consumer voice. For example, where the GSGB may identify things that are interesting, there may be a desire to explore more consumer data.

Research/Surveys

Data on Young People

ABSG were informed this provides insights on young people's attitudes, behaviours and habits. There is also an appetite to look to add a few more data sets under experimental data sets – adding to [REDACTED] and YouGov data, with conversations happening with the Advertising Standards Authority and also, the Office of National Statistics around Visa transactions.

In general discussion of the data collections, ABSG looked to the future and areas the Commission may be engaged on, i.e financial vulnerability, binge gambling, sustained heavy losses, online stake limits, emerging and new products and asked how/where will data be captured? ABSG were advised the Young People Survey touches on some of that, alongside the regulatory returns working group and an October workshop with Entain. They were advised the Commission can change questions asked without consulting, however it was felt there is more engagement needed with operators. In turn, this helps with quality, sharing data openly, what we can publish in an accessible way.

ABSG advised data sources aren't being harmonised to isolate different operators and impact they have on individuals. For example, research/surveys look at data on exposure to adds, see which operators are pushing adds and who is spending with who.

ABSG were advised that the Commission is developing its data capacity and is looking at how to use it. ABSG reflected on the discussion and noted story telling is key to bringing the data alive and engaging with people with lived experience. The Commission conference in March, the panel talked about this - not just the consumer voice but affected others. Turning data into that narrative – bringing that data to life.

Closing comments

ABSG noted the session was helpful ahead of meeting on 12 September where they would be looking at the Corporate Strategy and impact metrics.

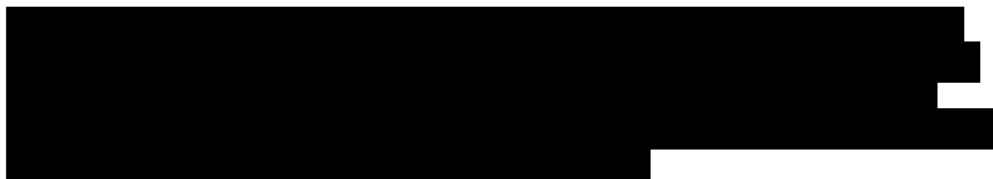
Advisory Board for Safer Gambling – 12 September 2023

Venue: Remote via Zoom

Time: 09.30 to 13.30

Attendees: Anna van der Gaag (Chair), Cath Cooney, Philip Newall, Ulla Romild, Jane West [until 12.30], Stephen Sharman & David Zendle

In attendance:



Apologies:



1. Welcome, apologies and declarations of interest

█ welcomed all attendees to the meeting. No apologies were noted.

Members sought advice on new declarations of interest and clarification on the process was provided. Matters were taken offline.

2. Minutes, matters arising from 13 July 2023 and opening remarks

The minutes from 13 July 2023 were approved.

3. Chairs Report

The Board received a verbal update from the Chair and the following key points were noted:

- The Chair reflected on the ramifications of the recent announcement that £32 million of regulatory settlement funds will be distributed via Gamble Aware, noting ABSG's concerns, and the risks associated with the approach. There were mixed reactions/concerns around the announcement, in the main these had been negative. Reg settlements were raised at the recent DCMS Select Committee, and the Chair felt there was re-assurance that this regulatory settlement fund would be separate from Gamble Aware's voluntary contributions. As such some providers and academics would be comfortable applying for these funds, until the Statutory level is in place. It would be for individuals to make their own decisions on this.
- Key takeaways from a meeting with the Chair of the Commission - pleased with progress on the consultations of the White Paper (WP) and new appointments to the GC Board. Encouraged ABSG to take an active part in the Corporate Strategy and particularly impact metrics.
- The Chair also outlined thoughts on the topics of the levy and financial risk assessments and the framing of the discussion on personal freedoms.

- The Board were advised that the mechanics of the Levy and the creation of an ombudsman are areas of GAR being led by DCMS. The Chair noted that ABSG have an interest in the development of the levy as they have previously given advice on the topic. It was noted that future funding architecture should retain the expertise that exists within the voluntary sector, particularly on the treatment side.

The Board shared their reflections on the Chairs Update:

- Reflected on the Select Committee and reference made to the positive contribution of ABSG to the work of GC.
- On the regulatory settlement announcement and new system in place, felt clarity of messaging was an issue, for example in Glasgow, people are unsure which part of the Gamble Aware money they can apply for.
- The Board were advised the role of Advisory Groups is to help the GC in its role to regulate better. The Statutory Levy rests with DCMS, it is not clear yet how involved the Commission will be on design of the Levy. Once the GC have outlined their position, we will explore options for further engagement with ABSG.
- The Chair noted the levy is a pressing issue – single biggest change for treatment, prevention and research on reducing gambling harms.

4. Gambling Management Tools (GMT's)

The Board were joined by members from LEAP and DAP. The Chair asked members to introduce themselves.

The Group were advised that the purpose of the session was to discuss a policy area which the Commission is planning to consult on later in the year. The discussion would look at experience in using these GMT's, any good design practices, innovation and how impact is considered. It was highlighted that this policy area is not considered in isolation and is part of ongoing work in a wider context. The Group noted three broad policy options which are being considered for the consultation document:

1. Fully mandated – all accounts will have a limit applied with no opt-out. The upper limit is pre-determined and cannot be exceeded but customer can set lower limit.
2. Mandatory to participate – all accounts will have a limit applied with no opt out. Customer to set the limit. May be offered using free text or pre-populated with defaults which can be overridden.
3. Default opted in – all accounts will have a limit applied as a default, but with an option to opt out completely. Customer to set the limit. May be offered using free text or pre-populated with defaults.

The Chair introduced the first question and asked LEAP members:

- **From personal experience, how have you made use of player-centric tools?**

Reflections from members of LEAP:

- Had experience of the tools, however, limits do not carry through to another operator. It was suggested to consider how effective limits are without the use of Single Customer View (SCV).
- Attempted to use limits but would be unsuccessful. A participant felt there is much emphasis on limits to prevent harm, whereas the impact of reverting the limit, can cause more harm. Urged a sense of caution around the approach taken.
- Noted no previous safeguards in place to prevent gambling more than a desired amount.
- Noted tools can be a tick box exercise and sometimes no engagement is needed to ask for tools to be removed. A participant noted, it could be helpful if implemented across all Operators, as opposed to being able to move around other Operators and avoid tools. Felt from experience Gamstop & Moses were the most effective tool. However, it had its limitations, for example having to pinpoint each shop to self-exclude, instead it would have been beneficial to be able to give a parameter for self-exclusion.
- Noted it was difficult to perform these safety measures when addicted to gambling.
- Noted it could be helpful if affordability checks encouraged gamblers to set deposit limits straight away to become the norm from the start of the journey.
- A concern was raised that limits do not consider pre-existing money held on accounts.
- Noted to consider different products and different deposit limits for different types of product i.e deposit limits on sports betting opposed to slot games.
- Noted it would be beneficial to have a mandatory deposit limit that would be universal, however impact of limits depends on what that limit would be set at.

The Group discussed more widely with views from members of ABSG & DAP, considering other designs and practices in other jurisdictions and key points/reflections were captured as follows:

- In Nordic countries there are universal loss limit restrictions and customers can also set personal loss limits which are lower. In Finland there are fewer gambling Operators, as Finland operates with a regulated state monopoly. Universality is important, having a single place to set limits. Co-ordinating limit setting with other aspects of safer gambling, such as messaging, is also helpful.
- In Norway when people choose limits, they are also contacted. Noted this could be a good combination but requires a Single Customer View. Human contact is important – studies such as patterns of play have highlighted that human interaction by UK operators has been very limited.
- It was noted that marketing offers are not in consideration to limits set, i.e in a certain time period it would be possible to increase an imposed limit to take advantage of an offer.
- It was noted there is a significant marker of harm if customers are changing limits, and they should not be receiving marketing information.
- Technological solutions are available. However, there is an impact that gamblers can be stopped from gambling where they are successful at gambling and the Commission should be mindful of this.
- Options to link to SCV as a natural extension of Gamstop, is the extension of limits, however SCV is complex and current plans are small in scope. The possibility was noted of utilising deposit limits with open banking, and Application Programming Interface (API). It was noted that the exchange of data, can be costly to industry. It was queried why centralised deposit limits couldn't be used. As a logical extension of

Gam stop and Gamprotect being explored. It was noted that tools are connected, there are different types of limits and timeframes, a suggestion was raised to bring together pre-commitment options from player to player. Also, the differences between daily limit, versus monthly limit and understanding how people use limits.

- It was noted that people constantly setting and changing limit levels should be seen as a significant marker of harm.
- The group acknowledged components fit together and questions were raised around should there also be a centralised deposit limit? Whether there is enough about the types of limits?

The Group were advised the intention is to implement incrementally and this will help to fill the data gap. Aim to draw out the long term future and policy options, being realistic about proposals outlined with the WP. Can and will want to flag where the evidence will push in a different direction. It is unlikely centralised deposit limits could go into the consultation, as unlikely to implement this in given timeframes, noting there are a lot of shifts happening at one time however want to continue to explore.

The Group highlighted the benefit of signalling to the long term objective - whilst this consultation needs to be focused on financial limits, there are other aspects in the frame. The Group discussed suggestions/solutions around this, and the following points were raised:

- What extent do Canada's initiative on low risk guidelines come into this and is there an interest for the Commission? The Group were advised that there is significant interest in low risk guidelines and noted the benefit of shared information with other departments and agencies to garner public conversations. It was also noted that the other aspect of the WP is consumer journey and messaging and the role of Public Health and how the GC implement, recognising the burden is on the industry. Discussed the right messaging from Public Health – deposit limits and financial limits, early stage as a preventative tool and where low risk guidelines might be helpful.
- It was noted that there are varied estimates about how many people use tools. A helpful basis for consultation and discussion would be to understand how tools are currently used.
- It was stated that in the absence of evidence of financial limits being effective in protecting consumers and preventing harm (or in fact if they have the opposite effect), a participant supported a precautionary principle and not promoting limits as a harm prevention tool. It was noted that most of the research is self-report, rather than account detail and until access to this is obtained, it is difficult to know.
- Related to the above, it was also noted that limit setting could play a role as part of a package of safety measures – and suggestion that the Commission is not considering relying on this in isolation.
- It was noted there are advantages to a centralised system, independent of the industry - the right incentive and tools to increase understanding of safer gambling.
- A suggestion was put forward of a universal system that works across the board, i.e a centralised card that builds up data on how people bet and covers SCV.
- It was also noted that limit setting from banking could play a role in creating a platform for cross-operator limit setting.
- The Group noted the research flaws, i.e often a measure is whether spend has reduced. Research is scanning internationally on deposit limits as to impact on people at the right time, right stage.

- It was suggested to talk to larger Operators as to what data is available, how customers engage with limits, how they use them? The Group were informed there is a pilot program asking for this data.

The Group weighed up the pros/cons of having this data available before going out to consult. The Group were asked to consider whether the Commission should strive for 'perfect' data or accept a reasonable level of judgement based on possible available evidence before improvements are made. The Group provided their views on whether the Commission should wait for better evidence before making progress on the Consultation and the following key points were noted:

- Access to data other than self-report is part of the challenge.
- Recognised it was important to make progress and that timeframes for delivering GAR are not entirely for GC to set. Agreed that need to make progress using best available evidence.
- Understand basic metrics of how many people have used limits - gather routine data and metrics.
- From a gambling related harms perspective, look at how people are using limits, over a sustained period. If tampering with limits, more effective to understand this.
- Current recruitment for specialist data capacity in the GC is helpful.
- How metrics are used to measure successes is difficult, i.e it can include people who have not gambled online. There is a broad range of data, depending on what methodology is used.

The Group were advised that the Commission are progressing with building in-house skills and architecture needed to extract more data from Operators at account level. However, it was recognised that this work is on a longer time scale than data available to inform consultation. The Group discussed the second question, and the following key points were noted from discussion:

- **What does good design look like? Are there examples of good practice from other jurisdictions?**

- In Australia they use activity statements showing wins and losses - evidence that monthly spend statements increase awareness and reduce unaffordable spend: https://behaviouraleconomics.pmc.gov.au/sites/default/files/projects/better-choices-online-wagering-report_0.pdf
- A participant debated whether policy option 1 or option 2 in the paper (paper 2) was achievable - the difference between option 1 and financial risk checks, the consumer can change and opt for a lower limit and it was noted that financial risk checks contain an element of taking away consumer choice.
- Option 1 one was felt to be less controversial as a customer can set a limit.
- Ongoing research in Sweden to use the financial system to set limits.
- It was noted that limits being a precautionary principle that becomes part of the narrative when somebody enters into gambling, along with other regulations could help to prevent harm in the long-term.
- A participant noted from past experience, they previously had no concept of how much was spent, until an email from a VIP Manager awarding 10% cashback on losses.
- It was suggested if managing deposit limits from the off, be realistic as to what average gamblers spend. Assess the behaviour behind the limits.

- It was noted that building awareness around somebody's gambling journey from an early stage is important. Not just deposit limits, the time spent gambling, showing how this may have increased over a period of time – impact to financial life and personal. Showing key indicators can be helpful to offer support early doors.
- Suggestion of limits applied based on average spend. It was raised to what extent people are being made aware of what they have actually spent.

In drawing the session to a close, the Group recognised the overarching question, in the absence of a universal tool, what could be in place? Officials advised they are striving for long term solutions but improving incrementally in the meantime. The Group felt more could be done than is being proposed in the current position. Including signalling long term direction, i.e more to be achieved from account data to understanding harms and doing the right thing. It was felt that data could solve a lot more and GC should not be over reliant on limits.

5. The GC Corporate Strategy and Impact Metrics

The Chair welcomed Officials to the meeting and outlined the questions for discussion in this session:

- What would help to measure the Commission's impact outcomes with particular regard to those linked to gambling related harm, and are there any practical ways we could demonstrate our own impact rather than that of others?
- Further to the feedback already provided by ABSG on the Overall Strategy, which is being considered. Are there any further issues raised or clarifications needed to better explain our position and activities, in light of actions from the GAR and White Paper?

Officials noted that ABSG had already provided feedback on the draft Corporate Strategy (2024-2027) and that today's session would consider Impact Metrics and explore what more could be done to demonstrate progress. ABSG initially discussed the Corporate Strategy, and the following reflections were shared from the Group:

- Suggested further clarity on regulatory purpose, there is a lot on regulatory function. There is also no reference to harms and harms reduction. The narrative is helpful around regulatory responsibility on products, places and people, consider shifting towards product design, safety design. Strategies need to reflect wider political environment and context. Assurance was given to the group that this is considered in the document.
- Ensure 'vulnerability' is clearly defined and noted it is difficult when looking at what data to use for this. From the strategy there wasn't a sense of the inequalities in harm and getting a better understanding of this. It was noted that the recent GC Vulnerability Statement does help with this, but it was questioned as to what metrics are used to measure that? Different organisations and specialists use the term differently - ideally have a benchmark.
- Considering all the changes in the WP, what does a transformative approach look like? What is the vision for the gambling landscape in Great Britain for reduction of harm and obtaining greater data? How is a different vision achieved? There are a number of seeds for transformation and the Commission needs to be clear in its role as a regulator.
- The Group reflected on the recent Select Committee, i.e gaps in knowledge around National Lottery.

- Look at other regulators, i.e OECD regulatory outlook - what's best practice in terms of regulation?
- Cross Government collaboration - collaboration with stakeholders and use of big data, across the sector in gambling.

The Group were advised that since sharing the Strategy, the data piece has changed, being more ambitious, clearer on what we need to do now, to invest in the infrastructure. The GC Board are actively engaged around the data aspect of the strategy.

A discussion ensued around the Impact Metrics, specifically the wording of the 'Strategic Regulatory Outcome' (paper 4) and the proposed source of metrics. The Group discussed each outcome in turn and raised the following key points/questions:

Protect

- Important to assess how effective the controls are. Are there any other ways in which you can tap into other data sources that might inform that question?
- Is the statement under outcomes relating to 'vulnerable people' sufficient? It was noted that this is the goal, but that it is harder to measure. The Group were advised that there is a greater emphasis on evaluating requirements and compliance with requirements and are a series of proxies to measure against, i.e are Licensees complying with consumer protection requirements that have been imposed.
- Would like to see greater granularity on customer interaction rates i.e calls/emails broken down by Operators and put in public domain. The market can see what its competitors are doing. There is a mis-match in current customer interaction rates between what is needed from Operators and what is received. Improved data could help demonstrate compliance and help in raising standards across the sector as a result.
- Financial risk checks and data on unaffordable losses/binge gambling.
- ABSG believe that it is still important to use metrics to signal zero tolerance of gambling-related suicides. Ambition should be to collect data on this.
- It was raised that the extent of losses and time spent gambling are the most consistent indicators of harm – any metrics the GC can publish by Operator, would be helpful.
- A query was raised regarding available data from the health system. To which the group were advised how there is a potential for collecting info on harms and also recognising there is manifestation in all different vehicles. However, there is a need to consider role of the GC in the eco system, the key thing we want to measure is whether our licensees are complying with our requirements to protect consumers.

Fair and open

- How to clarify fair and fair from whose perspective? (i.e difference between Operator and Consumer). The Group were advised this outcome is from the consumers perspective - taking the present sense from consumer trusting the product they are playing.
- Benefit to reviewing complaints data 'by Operator'. The Group were advised there is an appetite for greater transparency on this. Customer complaint data is currently recorded by top themes, not by Operator.

- A query was raised about the 'Trust' metric used with Yonder. The Group were advised the Yonder work is qualitative, looking at what trust means to different consumers? There is potential work in developing the metric, once we understand what drives trust/ what is meant by trust.
- Consider fairness and the point in which openness should begin. For example, targeting advertising, VIP schemes, fair and open issue and metric to be considered, would be for operators to provide to the GC why they are targeting individuals in the way they are. A suggestion raised to extend the ability to collect and process data to deem fairness.
- Is it possible to create an interface at a granular level where every Operator is giving details of who/what they are targeting? The Group were advised there are difficulties with affiliates.

Crime

- The Group reflected on the remarks made at the recent Select Committee regarding ongoing activity and progress in terms of telling the public what the GC is doing. The Group were advised that illegal gambling is an area where the GC is trying to seize control of the narrative and rejecting the framing of the industry. The regulatory outcome is phrased in such a way as to try to put some success criteria onto the outcome. The focus is more on what the Commission is trying to do with those operating illegally and targeting UK consumers. █████ is to do some further work on what proxies do exist, to set some trend data on demonstrating our impact.
- The Group noted that Officials are talking to an affiliate platform around the flow of money and if there are ways of measuring the money flow from outside of the UK, from transactions with UK customers to see the flow of money to unregulated sites.
- There is an opportunity with data which the GC is already piloting the use of – data from YouGov and open banking. From banking data, can see how much flows into gambling. The Group were advised that the pilot around open banking data, they may not know till a while off as how that impacts.

National Lottery (NL):

- It was noted that the Select Committee discussion reflected no evidence of harm relating to NL, felt this may not be representative of the evidence base.

The discussion drew to a close and Officials may return to ABSG for further discussions as the work progresses.

6. AOB and Reflections

The Group reflected on how they found the timings and format of the meeting, which was overall positive.

For newer members, it was raised that it would be helpful to have a summary before each meeting on matters discussed previously/advice given, so as to avoid duplication of ideas/thinking. The Group noted this would be challenging to do and discussed the benefit of re-pitching ideas again and the benefit of discussing with other Advisory Groups.

Action: The Chair requested members email any links to relevant research to GC colleagues from today's sessions.

Resources shared in the meeting:

BBC Radio 4 Podcast 'Desperate Calls'

- <https://www.bbc.co.uk/programmes/m001k717>

Public Health Scotland – 'Update to Minimum Unit Pricing (MUP) for alcohol - Evaluation findings at a glance'

- <https://publichealthscotland.scot/news/2023/august/update-to-minimum-unit-pricing-mup-for-alcohol-evaluation-findings-at-a-glance/>

The Lancet – 'Commending Public Health Scotland's evaluation of minimum unit pricing'

- [Commending Public Health Scotland's evaluation of minimum unit pricing - The Lancet](#)

In terms of the 'Protect - Under 18s strategic regulatory outcome' see this new report on gambling among 15-16 year olds in Ireland, published by the **Institute of Public Health Ireland**

- <https://www.publichealth.ie/sites/default/files/resources/Gambling%20and%20children%20report%20final.pdf>

Swedish research on monetary systems rather than operator data –

- ["Show Me the Money": Preliminary Lessons from an Implementation of Intervention Tools at the Payment Gateway Level | SpringerLink](#)

Meeting of the Advisory Board for Safer Gambling: 16 November 2023

Venue: Remote meeting
Time: 09:45 to 12:00
Attendees: Anna van der Gaag (Chair), Cath Cooney, Philip Newall, Ulla Romild, Stephen Sharman, David Zendle

In attendance: [REDACTED]

Apologies: [REDACTED]

1. Welcome, apologies and declarations of interest

- 1.1. [REDACTED] welcomed Board Members to the meeting and noted the apologies from [REDACTED]
- 1.2. No new declarations of interest were raised.

2. Minutes, matters arising from 12 September 2023 and opening remarks

- 2.1. The minutes of 12 September meeting were shared and agreed.
- 2.2. The group received a short update on appointments, [REDACTED], and the Data strategy:

Appointments:

- 2.3. The Group were advised that a [REDACTED] role officially changed in October to lead data and innovation work. In the meeting it was announced that [REDACTED] will be taking over the Head of Advisory Group role in January [REDACTED]

ACTION: [REDACTED] to be invited to all meetings.

- 2.4. LEAP has recently completed a large recruitment drive, with seven appointments made. The group is currently six members with four due to step down soon. A further recruitment drive will take place in 2024, with a focus on further diversity of the group. The recruitment process will also be reviewed to

ensure that the recruitment is successful, this may include applicants submitting videos as part of their application.

- 2.5. ABSG was informed that the gender split is 4 women and 5 men. The group were informed that the anonymised recruitment process was not as beneficial to this type of recruitment as they criteria for LEAP members is very different to a recruitment for a technical role within the Gambling Commission.
- 2.6. ABSG offered to advise the LEAP coordinator on recruitment ideas for the next LEAP recruitment drive.

ACTION: Add LEAP recruitment advice to forward look for February meeting.

- 2.7. The Digital Advisory group (DAP) has also completed a successful recruitment drive and now has three new members. They had their first meeting in November.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 2.11. The Group were informed of two further projects currently underway which are:

- a) A project on Facebook advertisements with a recent PHD Graduate. This focuses on analysing bonus offers and inducements.
- b) A project looking at social media posts about gambling operators to explore how this source of data can inform our view of operator risk.

3. Chairs Report

- 3.1. [REDACTED] reflected on the following key points:

- a) The recent appointment of the Industry Forum Chair
- b) The Statutory Levy Consultation

- c) [REDACTED] on behalf of ABSG will be writing and presenting a paper to the next Board (7 December)
- 3.2. The main focus of the Chairs report related to the Consultation work. The Board noted that there is a lot of tension within the system regarding a commissioning body to ensure all aspects of RET would receive funds.
- 3.3. The Board reflected that a lot of concerns have been raised about the current set up for groups to receive money via the current RET system and how this will be reflected with a new statutory Levy.
- 3.4. The Board briefly discussed the levy including:
 - 3.4.1. Who will be commissioning money/projects (OHED or other)
 - 3.4.2. Prevention and Health
 - 3.4.3. Looking at other jurisdictions such as New Zealand and other industries such as the alcohol tax.

Updates from other members

- 3.5. [REDACTED] advised that she was encouraged by conversations between the Commission and the Scottish Government. She advised that she would like to be involved in any further discussions, if there is an opportunity to do so.
- 3.6. [REDACTED] advised that he had attended the Ofcom round table, and this could be an organisation to look at in terms of the levy and how it interacts with research communities. He advised that it is a good model for regulator and research relationships.
- 3.7. The Board was advised that they can respond on the latest consultations as an individual academic.
- 3.8. [REDACTED] reminded the board of the evidence gap document to help clarify the shared goals, and how this can increase the prominence of this work in the academic field.

4. Update on the latest Young People and Gambling Statistics

- 4.1. [REDACTED] welcomed the Head of Statistics and one of the Research and Impact Manager's to the meeting.
- 4.2. The Board was advised that the latest Young People and Gambling Statistics had gone live on the website earlier that morning.
- 4.3. The Board received a short presentation outlining some of the key data and trends from the survey. The Board noted that this survey had included, for the first time, independent schools and 17-year-olds.
- 4.4. The Board discussed the results and provided the following thoughts and questions:

- 4.4.1. The decrease in the problem gambling rates for 11-16 year olds, noting that there is only one year to compare the rates to. This will be of interest for the results next year. The group contemplated if the changes to advertisements had caused the decrease.
- 4.4.2. The group noted that they are interested in the trends and results from arcade gaming to see the impacts at young people and as an adult. The Board were advised that Arcade machines are always a top activity for young people. It is an activity that many young people will do with an adult supervising. The board asked what was next for this area of the research. ABSG Members advised that they would be interested to help with this research work.
- 4.4.3. The Board discussed the views that young people had said that gambling earnings had helped to buy things such as holidays, the Board thought it would be good to delve into this more to understand perception of this vs if this actually happened. They also noted that understanding why young people think this way could be useful.
- 4.5. The Board asked the Research and Stats team how they can best advise the team and help.
- 4.5.1. The Team advised that they are already looking ahead to next years survey and question design. They asked the Board which areas should be of focus or where further questioning might be useful that could be added into the design. They also advised to review the language of the questions to ensure they are fully understood by the age range of participants. The Board reflected on the difference between results from young people in independent schools vs state schools. They also noted the following could be explored further:
- Quality of sleep.
 - What gambling earnings are paying for (e.g. holidays, food) and the impact of cost of living.
 - Geography of participants
- 4.6. The Board discussed the data that is available to researchers after the results are published. It was noted that it can be difficult to use the data for secondary analysis as things such as coding could be clearer. It was also noted that being able to access data quicker would be beneficial for research.

ACTION: [REDACTED] to send some feedback to Research and Stats team on data useability.

- 4.7. The Board briefly discussed gambling markers of harm and gambling behaviours to inform metrics. They discussed the FCA approach and the banking sector.
- 4.8. ABSG thanked the team for the presentation and advised that they are looking forward to reading the report in full.

5. AOB and reflections from ABSG members, including on any recent engagements

- 6.1. The group was asked to confirm availability for the 2024 meeting dates. The Group noted that extra meetings may be added throughout the year to cover any gaps or help with specific pieces of work as required.
- 6.2. The group will invite the interim Head of Advisory Group's to the informal December meeting.
- 6.3. [REDACTED] Advised that she will share the [REDACTED] ahead of the February meeting. The group was advised that this is confidential and should not be shared.
- 6.4. A copy of the draft board paper will be shared soon for collaboration by ABSG members.