
From: [REDACTED]@gamblingwithlives.org>
Sent: 15 August 2023 19:33
To: Andrew Rhodes <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@gamblingwithlives.org>; [REDACTED]@gamblingwithlives.org>
Subject: Gamblers Consumer Forum and DCMS Select Committee

Dear Andrew

I attach the annex to a letter which we have sent to Dame Caroline Dinenage in her role as Chair of the DCMS Select Committee. The annex addresses a number of complaints (about our evidence to the Select Committee) made in a letter to you from an organisation called the Gamblers Consumer Forum (GCF). We included the annex in our correspondence with Dame Caroline since they had copied the letter to her. For completeness and transparency, I have attached our letter to Dame Caroline.

I'm not sure why GCF sent the complaints to you: we have had no contact from them. Indeed we had no knowledge of them until days before their letter was 'announced' on Twitter. However, we wanted to address the allegations made. We reject all their claims.

[REDACTED]

[REDACTED]

Best wishes

[REDACTED]

Web: www.gamblingwithlives.org

[Redacted]

From: [Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)>

Sent: Wednesday, October 18, 2023 6:15 PM

To: [Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)>; [Redacted]

[Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)>; [Redacted]

[Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)>

Cc: [Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)>; [Redacted]

[Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)>

Subject: RE: Lines for Gambling Consumers Forum Letter

[Redacted] In that case, I suggest below an amended version of [Redacted] draft which seeks to further address the proposal, including that GC commission their app - not something I think we would ever consider appropriate.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Sent: Wednesday, October 18, 2023 5:31 PM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: RE: Lines for Gambling Consumers Forum Letter

I'm also not excited about meeting them and giving them that level of status [REDACTED] especially an Exec or Director level meeting.

[REDACTED]

[REDACTED],

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Sent: Wednesday, October 18, 2023 5:02 PM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Subject: RE: Lines for Gambling Consumers Forum Letter

The difficulty with offering a meeting in my view is that they are positioning this app as an alternative to the Government's position and our proposals for FRCs. So their email is conflating a potential treatment solution with a live consultation proposal. Whilst also continuing to incorrectly view our regulation as being aimed solely at addiction rather than protecting children and vulnerable people from harm.

I don't have a strong view about whether we meet them or not, but if they want to talk about treatment solutions they are probably best directed to others eg. GambleAware, NHS or those able to evaluate their app. The idea that we are going to commission an app and new associated screening approach and drop the proposals the Government has

determined are required seems a little far-fetched. They list various experts who have endorsed the app but have not provided evidence of its efficacy. With all that in mind and assuming there is nobody else drafting a response does something along the following work subject to any amends from others....

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>
Sent: Wednesday, October 18, 2023 12:18 PM
To: [REDACTED] [\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]
[REDACTED] [\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED] [\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>
Cc: [REDACTED] [\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>; [REDACTED]
[REDACTED] [\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>
Subject: FW: Lines for Gambling Consumers Forum Letter

Do we think we need to offer them a meeting? [REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, October 18, 2023 11:22 AM
To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]@gamblingcommission.gov.uk>
Subject: FW: Lines for Gambling Consumers Forum Letter

Hi all,

We've had a chase from DCMS on the GCF letter they've received. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]@dcms.gov.uk>
Sent: Wednesday, October 18, 2023 11:12 AM
To: [REDACTED]@gamblingcommission.gov.uk>
Subject: Re: Lines for Gambling Consumers Forum Letter

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

Hi [REDACTED]

Just wanting to follow up on the below and see if you have a response planned?

Best,



[REDACTED]

www.gov.uk/dcms

On Thu, 12 Oct 2023 at 14:46, [REDACTED]@dcms.gov.uk> wrote:

Hi [REDACTED]

Hope you're well

We have received the below letter from the GCF and wanted to know what you are considering for your response and if you are planning to meet with them?

From: [REDACTED]
To: [REDACTED]
Subject: RE: Confiscation of Funds
Date: 30 October 2023 15:00:00
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)

[REDACTED]

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, October 30, 2023 2:56 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Subject: Fwd: Confiscation of Funds

[REDACTED]

This one's for me to respond to as I penned the GCF letter [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]@IBAS-UK.co.uk>
Sent: Monday, October 30, 2023 2:22 pm
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk> [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>
Subject: Confiscation of Funds

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

[REDACTED]

[REDACTED]

One of our Adjudication Panel members noticed that in a recent letter to the Gamblers Consumer Forum the Commission included the following when discussing checks made at withdrawal:

This reflects the CMA's earlier work on account withdrawal issues which also recognised that operators need to fulfil their general regulatory obligations (including eg anti-money laundering and fraud prevention obligations) – the CMA noted that while these obligations may justify a delay in payouts, they cannot justify confiscation of funds.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

IBAS PO BOX 62639, London EC3P 3AS



This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Extract from Internal Emails, August 2023

Subject: Letter of Complaint

Sent: Tuesday, August 15, 2023 10:56 AM

We'll need a new folder for the Gambling Consumers Forum in our Stakeholder files.

Sent: Thursday, August 3, 2023 9:07 AM

I think they make their own mistake in the use of official stats in the letter

Sent: Thursday, August 3, 2023 9:02:00 AM

I note on their website they have announced they wrote to us as well: The GCF write to the Gambling Commission about the misreporting of official statistics and misinterpretation of data to the DCMS Select Committee - Gamblers Consumer Forum.

Their main issue is affordability checks as detailed on their website.

Sent: Wednesday, August 2, 2023 5:44 PM

I'm interested to know what we know about the GCF, if anything, including who is involved. It appears to have been set up in July 2023.

Sent: Wednesday, August 2, 2023 3:25 PM

We've received the attached letter from the Gamblers Consumer Forum regarding the evidence that Gambling With Lives gave at the recent Select Committee.

Extract from Internal Emails, August 2023

Subject: RE: Andrew's letter

Sent: Tuesday, August 15, 2023 1:33 PM

We've made two requests for corrections from the Gamblers Consumer Forum and the Arena Racing Company – the details of these are as follows:

- *Gamblers Consumer Forum - You make reference to the "99.8% of gambling consumers who bet without issue". This presumably references our quarterly telephone survey data that relates to the whole 16+ population so the figure relating to just gambling consumers would be lower.*

Sent: Monday, August 14, 2023 5:10 PM

We also pointed out the errors to the gambling consumer forum or whatever it's called.

**Extract from Letter sent from the House of Commons to the Gambling Commission,
25 August 2023**

The Gamblers Consumer Forum recently estimated that as a result of gamblers not contributing to the Levy after rejecting affordability checks, the Levy Yield roughly halve, and as a result, would see a 17.5% drop in prize money.

Extract from Internal Email, September 2023

Sent: Wednesday, September 20, 2023 9:11 AM

I think this is the second correspondence from this group (albeit I don't actually know who the group are, represent etc).

Extract from Internal Email, September 2023

Subject: FOI Request

Sent: Monday, September 25, 2023 11:46 AM

2. Please can you disclose the names of all organisations and/or individuals that the Gambling Commission has written to since the start of 2023 in relation to the misuse of Official Statistics by those organisations or individuals?

The ones I know of are Gamblers Consumer Forum.

Extract from Internal Email, September 2023

Subject: RE: Letter re open letter to Racing Post readers

Sent: Wednesday, 27 September, 2023 14:45 PM

*Am just looping in [REDACTED] on our draft reply to [REDACTED]
[REDACTED]/Gambling Consumer Forum.*

**Extract from Email sent from the House of Commons to the Gambling Commission, 27
October 2023**

It is my understanding however, based on disclosures made under the Freedom of Information Act, that the Gambling Commission has written to just two organisations since the publication of your open letter on 14th August – the Gamblers Consumer Forum and the Culture, Media and Sport Committee; and no referrals have been made to the OSR. You appear not to have written to anyone else to “correct the record”.

Media Summary, 9 August 2023

National - The Guardian (09.08.23) – reports that the company behind lobby group – The Gamblers Consumer Forum (GCF) - is co-owned by a consultant for the betting industry. The group describes itself as the “voice of gamblers” on its website. Analysis by the Guardian has found that the group has ties to politics and a veteran gambling industry consultant.

TalkRADIO, 29 August 2023 19:10 - 19:15

In the studio, co-founder of the gamblers consumer forum.

Winning Post, 24 October 2023

Recent disclosures made under the Freedom of Information Act reveal that, since the open letter was published, the Gambling Commission has written to just one organisation – the Gamblers Consumer Forum - other than the select committee.

Media Summary, 1 November 2023

The Sun (01.11.23) – report on a survey by YouGov for the Gamblers Consumer Forum, which found that 53 percent of those surveyed believe there is a risk affordability checks will see an increase in black market activity. Article is also available to read online.