

From: [REDACTED]
To: [REDACTED]
Subject: RE: Lines on publication of survey results for correspondence
Date: 20 March 2024 14:13:00

Hi [REDACTED] hope you're well.

Please see below. Do let me know if you need anything further.

In 2020-21 the Commission conducted a consultation and call for evidence exercise on the topic of remote customer interaction, including on unaffordable gambling. The findings from the consultation part of this exercise were set out in our [response to the 2020-2021 consultation on customer interaction](#), and resulted in new customer interaction requirements which were introduced over the period 2020-2021.

We also published an [update on our next steps following the 2020-2021 consultation and call for evidence exercise](#), setting out the three key risks that we continued to seek to address: the identification of financially vulnerable customers, addressing significant unaffordable losses over a short period (binge gambling), and addressing significant unaffordable losses over time. In the update, we stated that we would continue to work closely with government to feed in advice and evidence to the Government's Review of the Gambling Act 2005 - recognising that broader public policy questions about how to protect people from harm would be considered as part of that Review. We provided formal [Advice to Government in 2023, including on the topic of financial risk checks](#).

We have never said that *there is 'no public interest' to support release of the findings [not aware we've ever said this– it's possible we said in response to an FOI that there was an intention to publish at a later date and no public interest in sharing it until then]* - we said we had already put some information out about the response in our [response to the 2020-2021 consultation on customer interaction](#), and in the [update on our next steps following the 2020-2021 consultation and call for evidence exercise](#), and that we intend to provide further information on the 2020-2021 call for evidence in connection with our response to the summer 2023 consultation.

Best wishes
[REDACTED]

From: [REDACTED]@dcms.gov.uk>
Sent: Tuesday, March 19, 2024 3:31 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Subject: Lines on publication of survey results for correspondence

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

Hi [REDACTED]

I hope you're well.

I'm preparing a response to some ministerial correspondence. This comes off the back of the [Gamblers Consumer Forum urging gamblers to write to their MP with this template](#). The template raises the following two points in relation to unpublished research.

- *After more than three years, it has still not released the results of a survey of the attitudes towards affordability checks of more than 12,000 consumers – undertaken as part of its 2020 call for evidence. It has refused a request for the publication of these survey results, claiming that there is ‘no public interest’ to support their release.*
- *It has suppressed its own research (conducted in 2019 by 2CV), showing widespread opposition to affordability checks by consumers.*

Please can you provide some lines to respond to these points. I understand from previous conversations with [REDACTED] and [REDACTED] that the call for evidence findings will be referenced in the upcoming consultation response so I'm happy to hold off replying so that we can link to the response.

Please can you share some lines with us by EOW.

Thanks,

[REDACTED]

--

[REDACTED]
Gambling & Lotteries

100 Parliament Street, London SW1A 2BQ

www.gov.uk/dcms

Gambling Commission Forward Look- Consultations and Calls for Evidence

'Implementation' refers to implementation of any proposed changes following consultation

* Consultations where scope/timings are still subject to Exec/Board approval

1. [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]

2. Consultation and Call for evidence on remote customer interaction requirements and guidance

- Completed- November 2020 - February 2021 (14 weeks)
- Response document to be published – Q2*
- Implementation – Q3* (requirements already consulted upon)

Subject to above:

- Follow up consultation – Q2/3*
- Response document to be published – Q4*
- Implementation – Q1 2022/23*

3. [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]

Closed consultations awaiting implementation:

- [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
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 - [REDACTED]
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[REDACTED]

Closed consultations awaiting implementation:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Subject to above:

- Follow up consultation – 12 weeks launched in Q3*
- Response document to be published – Q4*
- Implementation – Q1 2022/23*

2. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

Closed consultations awaiting implementation:

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

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- [REDACTED]
- [REDACTED]
- [REDACTED]

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- Implementation – Q3* (requirements already consulted upon)

Subject to above:

- Follow up consultation – 12 weeks launched in Q3*
- Response document to be published – Q4*
- Implementation – Q1 2022/23*

2. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

Closed consultations awaiting implementation:

[REDACTED]

- [REDACTED]
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Subject to above:

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- Response document to be published – Q1 2022/23*
- Implementation – Q2 2022/23*

2. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

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- [REDACTED]
- [REDACTED]
- [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

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- Completed- November 2020 - February 2021 (14 weeks)
- Response document to be published – Q4*
- Implementation – Q1 2022/23* (requirements already consulted upon)

Subject to above:

- Follow up consultation – 12 weeks launched in TBC*
- Response document to be published – TBC*
- Implementation – TBC*

2. [REDACTED]

- [REDACTED]
- [REDACTED]
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- [REDACTED]
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- [REDACTED]

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- Completed- November 2020 - February 2021 (14 weeks)
- Response document to be published – Q4*
- Implementation – Q1 2022/23* (requirements already consulted upon)

Subject to above:

- Follow up consultation – 12 weeks launched in TBC*
- Response document to be published – TBC*
- Implementation – TBC*

[REDACTED]	
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]

Closed consultations awaiting implementation:

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[REDACTED]	
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]

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** TBC as is dependent on when the GAR is published

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- Completed- November 2020 - February 2021 (14 weeks)
- Response document to be published – Q1 2022/23*
- Implementation – Q1 2022/23* (requirements already consulted upon)

Subject to above:

- Follow up consultation – 12 weeks launched in TBC*
- Response document to be published – TBC*
- Implementation – TBC*

- [REDACTED]
- [REDACTED]
- [REDACTED]

Closed consultations awaiting implementation:

- [REDACTED]
- [REDACTED]
- [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

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1. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]*

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

Closed consultations awaiting implementation:

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

Consultation and Call for evidence on remote customer interaction requirements and guidance

- Completed- November 2020 - February 2021 (14 weeks)
- Response document published – April 2022
- Guidance to be published – June 2022
- Implementation – September 2022

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1. [REDACTED]

- [REDACTED]**
- [REDACTED]**
- [REDACTED]**

[REDACTED]

- [REDACTED]**
- [REDACTED]**
- [REDACTED]**

[REDACTED]

- [REDACTED]**
- [REDACTED]**
- [REDACTED]**

Closed consultations awaiting implementation:

Consultation and Call for evidence on remote customer interaction requirements and guidance

- Completed- November 2020 - February 2021 (14 weeks)
- Response document published – 14 April 2022
- Guidance published – 20 June 2022
- Implementation – 12 September 2022

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Draft lines following select committee questions
Date: 01 July 2022 19:51:00

No problem – I wasn't really expecting a reply, but that is helpful.

From: [REDACTED]@dcms.gov.uk>
Sent: Friday, July 1, 2022 6:07 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk>
Subject: Re: Draft lines following select committee questions

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Thanks [REDACTED] and sorry for the delay in responding. The lines all look sensible to me.

[REDACTED]

On Thu, 30 Jun 2022 at 14:00 [REDACTED]@gamblingcommission.gov.uk> wrote:

Hi [REDACTED]

We spoke a short while ago and I said I would send over the lines I had provided to comms colleagues for consideration about some queries we received during today's SC session. There were two areas - [REDACTED]
[REDACTED] and then on affordability and why GC has not issued the conclusion on the affordability work.

Not agreed lines, but my starting point internally is set out below.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On affordability: I would use lines such as this - possibly too long, but could be a starting point for a note for the Committee if we do decide to write and shortened for press queries should we get any:

The Commission conducted a consultation on remote customer interaction alongside a call for evidence on affordability and other issues in 2020. We received approximately 13,000 responses to the consultation and call for evidence and held a programme of engagement to discuss with a wide range of stakeholders. As this is an area of policy that requires us to carefully consider how to balance the need for consumer protection and the need for consumer privacy and freedom, we indicated that we wanted a full and proper debate and consultation process. In May 2021 we published an [Update on Remote Customer Interaction Consultation - Gambling Commission](#) which indicated our planned next steps on the consultation and call for evidence. In that update, we set out our next steps.

- 1 The first was publishing the response to the consultation. Since then, we have published the new LCCP requirements and associated guidance for remote operators which will come into effect on 12 September.
- 2 The second was that we intend to feed in to the Government's Gambling Act Review to ensure that our work on this area can dovetail with broader public policy questions about how to protect people from harm. Our advice will be published around the same time as the Government's White Paper following the Review.
- 3 We also indicated that we would continue to engage with consumers, the financial sector and the gambling industry on the information about customers that should be available to gambling businesses. We have continued this work, and also engaged with the ICO to consider data protection issues associated with assessing financial risks for consumers. This has helped to inform our upcoming consultation.
- 4 Finally, we indicated that we would consult further on the issue of affordability and the three key financial risks which emerged from the call for evidence and our casework. The three key risks where we will consulting on more prescriptive requirements are: significant unaffordable losses over a short period

(binge gambling), significant unaffordable losses over a long period and customers who are particularly financially vulnerable. We intend to launch this further consultation later this year and have reaffirmed our commitment to do so publicly on a number of occasions.

We reiterate that operators must meet the current requirements and guidance in the meantime, and in doing so should be considering the three key risks identified above.

At all times, the Commission has been transparent about our progress and plans.

Thanks,

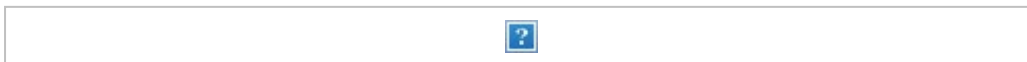


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Gambling & Lotteries
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 @dcms.gov.uk | 
 @dcms  /dcmsgovuk | www.gov.uk/dcms



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