

GAMBLING COMMISSION

Regulatory data collection

Consultation

16 November 2016

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1 Introduction and background

- 1.1** This consultation sets out the Gambling Commission's proposals to change some parts of the information that we require licensed operators to provide to us and gives an opportunity for stakeholders to comment on the proposed changes. Its main focus is on regulatory returns data, which all operators are required to complete and submit as a condition of their licence on an annual or quarterly basis.
- 1.2** In addition to regulatory returns we also collect regulatory data from other sources such as reportable events and data collected through the licensing process. These form some of the primary sources of data which enable us to undertake our statutory responsibilities and through which operators can demonstrate that they put the consumer at the heart of business decisions.
- 1.3** This consultation details the proposed changes to the data collected through the mechanism of regulatory returns, as well as the method of collection and invites comments on these issues. We intend to make these changes through a phased process, with a focus on making those changes which are more time critical (for example because of their importance to the [proposed changes to fees](#)) during the first phase.
- 1.4** Our guiding principles throughout this review process are the collection of the required data, at the appropriate time and by the most efficient and effective means. This will:
- a) focus on the collection of data which tests whether operators are putting consumers at the heart of business decisions
 - b) better inform us and enable the effective targeting of our activity
 - c) seek to minimise the regulatory burden placed upon operators, and
 - d) raise awareness amongst consumers by helping them to make informed decisions and promote an informed stakeholder debate about gambling.
- 1.5** As part of our focus on ensuring that operators put the consumer at the heart of business decisions, we have proposed certain topics worthy of further exploration, either by supplementing the data already collected through regulatory returns and reportable events, or by suggesting additional thematic (in-depth) work. We are mindful that our developing focus in this area may well result in future work on areas not specifically highlighted within this document, which may include the requirement for operators to make financial contribution to research, education and treatment of problem gambling (RET) or a sharper focus upon customer complaints data.
- 1.6** This consultation document is divided into the following sections:
- **Section 1** provides an introduction and some background to the consultation
 - **Section 2** outlines proposed changes to the elements that are common to all or some of the regulatory returns and the associated guidance notes, (including organisational and social responsibility information requirements)
 - **Section 3** outlines proposals for the harmonisation of certain products across both the non-remote and remote forms
 - **Section 4** outlines proposed changes to the sector specific elements of the regulatory returns and the associated guidance notes
 - **Section 5** outlines proposals for changes to the types of guidance to help the completion of regulatory returns
 - **Section 6** outlines some future proposed changes to collection and submission of regulatory data
 - **Section 7** explains how to respond to this consultation
 - **Section 8** recaps the consultation questions.

Background

- 1.7 We have collected regulatory returns since October 2007; they are a key component of the regulatory framework. It is a requirement of licence condition 15.3.1 of the [Licence Conditions and Codes of Practice](#) (LCCP) for all operators to submit a regulatory return. The information provided through regulatory returns informs a number of important regulatory functions such as understanding developments within the industry, planning of the Commission's focus and resources and publishing [Industry Statistics](#).
- 1.8 The fact that the Gambling Act 2005 (the Act) permits the collection of information from operators is not of itself sufficient justification for doing so. We are committed to balancing the principles of Better Regulation and to improving the quality of data requests and communicating why they are required; this is set against ensuring the data is able to provide the information needed to empower consumers and inform stakeholders, and in so doing to contribute to a well-functioning market.
- 1.9 As such we must have clear and specific purposes for all the data that we request and should link that to the best ways to provide relevant information to customers and other stakeholders. These rationales are outlined within the box below.

Compliance risk assessment:

This involves the collection of information which will be used to inform the Commission's risk assessment; that is, the risk that a particular licensed activity is considered to present to the licensing objectives, or the likelihood of an operator breaching licence conditions or the social responsibility codes of practice. This assessment will help to plan compliance work and its focus, particularly with operators where their size may cause the biggest impact. For example, if operators reported a significant increase in customer complaints, future compliance effort might focus in that area.

Compliance with LCCP:

It is an operator's responsibility to comply with licence conditions and associated codes of practice, including operating within the fee category specified on their licence. The data provided on regulatory returns allows us to check whether there has been a breach of that condition and whether a variation application should be submitted. Some of the data items in the regulatory returns relate to social responsibility requirements outlined in the LCCP. This information enables the Commission to consider whether an operator has appropriate arrangements in place to ensure compliance and when aggregated and published it can provide stakeholders with data to help them form a view on this market and its regulation.

Research and policy:

We are responsible for advising the Secretary of State on the incidence and impact of gambling, where this is necessary, to secure the continued achievement of the licensing objectives. The provision of information from the industry is an essential part of this. A detailed and continued understanding of the structure of, and developments in the industry will improve the quality of regulatory policy.

Strategic planning:

Information about trends in the industry will influence our deployment of internal resources, ensuring that our business plan reflects regulatory needs. The regulatory returns data will also help us to monitor the scale of the overall regulatory burden imposed on operators and to assess whether it is achieving proportionate regulation.

Provision of information to stakeholders about the industry:

We publish Industry Statistics on a bi-annual basis and they are designated as 'official statistics' under the Statistics and Registration Services Act 2007. A substantial amount of the information contained in the Industry Statistics publication is taken from the data in regulatory returns and this is a valuable source of information on the gambling industry in Great Britain. This provides contextual information to the public, to Government and to other stakeholders on the functioning of the gambling market, and can give wider public confidence that operators are acting in accordance with their licence obligations and consequently that the market is well regulated.

- 1.10** When we first introduced regulatory returns we committed to keeping the need for the information requested under review. This was to ensure that the returns were fit for the purposes outlined above, that we were making use of the data and not placing an unnecessary burden on licensed operators. As part of our review of the regulatory data collection and associated guidance, we are now consulting stakeholders on a number of proposed changes. The changes we are proposing take into account are informed by:
- a) our own experience of using information collected through regulatory returns
 - b) informal feedback from the industry provided through enquiries to us
 - c) stakeholder meetings and recent open events, and
 - d) relevant consultations including the [Commission's fee structures](#) or [amendments to LCCP for all operators in relation to the prevention of crime associated with gambling](#).
- 1.11** In carrying out the review we have considered whether:
- we are making full use of the data we request and that it informs our view of risks to the licensing objectives
 - the data we requested are still necessary
 - there are any gaps that should be filled
 - the request and its associated guidance are clear
 - licensees understand the reasons for asking for the data, and
 - we can improve the data capture, submission and quality assurance processes.
- 1.12** This document focusses on proposed changes but we are not consulting on every data item in each return. This is because we consider that many data items should be retained and the reason for their collection remains valid, for example the number of customer complaints. We will also 'tidy up' the returns to ensure that they are consistent and correct any typographical errors. These minor amendments do not materially affect the regulatory returns and are not specifically mentioned in the consultation.
- 1.13** Although this consultation contains a number of specific recommendations about the collection of data we undertake an ongoing evaluation of our data collection. This may in future require the addition of specific questions to regulatory data collection in order to meet our statutory duty of providing advice to the Secretary of State or any other function required of us.
- 1.14** This consultation does not seek to provide wide-ranging clarification on definitions, unless there is a specific requirement to do so. We intend to update guidance as necessary for any changes that are later implemented. Section 5 outlines proposals for changes to the types of guidance to help the completion of regulatory returns.
- 1.15** There are various ongoing¹ regulatory data collection mechanisms, each of which has certain structural attributes which lends itself to a particular type of data collection and most of which are accessed through the Commission's eServices system. The characteristics of each are described below:

¹ Over and above the data collection undertaken at the time of licensing.

- a) **Regulatory returns:** This mechanism lends itself to quantitative data submission which is easily aggregated across regular return dates (examples include ‘count of’ or ‘totals’ such as Gross Gambling Yield (GGY) data). It does not lend itself well to data which is time sensitive, or data which needs to be disaggregated or provided in more qualitative detail.
- b) **LCCP / key event notifications:** This mechanism lends itself well to data which is time sensitive (for example data which the Commission requires the operator to tell us within five days or as soon as practicable) or to data about individual events which are listed within the LCCP. Qualitative information can be transmitted in this way, including a description of the details of the event in question.
- c) **Issue specific compliance data:** For example customer funds reporting for remote operators.
- d) **Annual assurance statements:** Please note that the annual assurance statements are not in scope for this consultation.
- e) **Bespoke data requests:** We request other data, which is often a mixture of both quantitative and qualitative, either on a regular basis (such as regular age verification testing results) or as part of a one-off requirement, for example to support the provision of specific advice to the Department for Culture, Media & Sport (DCMS).

1.16 The rationale for collection of this data across the various regulatory data mechanisms is shown in the table below.

Reason for collection	Regulatory returns	LCCP / Key event notifications	Issue specific compliance data	Bespoke data requests
Compliance risk assessment	•	•	•	
Compliance with LCCP	•	•	•	•
Research and policy	•	•		•
Strategic planning	•	•	•	•
Provision of information to stakeholders (aggregated)	•			•

Implementation

1.17 This consultation contains some suggestions which, if agreed, will need to be implemented sooner than others – in particular the pieces of GGY data which are currently ‘missing’ and are required to provide an accurate overall picture of an operator’s GGY. In these instances we envisage their implementation to coincide with the fee proposals discussed in the latter sections of this document.

1.18 While some data on GGY or revenues will be required that has not previously been part of regulatory data submissions, we consider that in most cases this will be information that operators will already have to hand and should not present any problems to provide. For example we know that most forms of gambling with GB customers² are subject to gambling duties so it is reasonable to assume that operators will already collect this information for payments to HMRC.

1.19 Where this is not the case, operators should explain any difficulties as part of their response to the consultation.

1.20 We are assuming that any additional data requested through regulatory returns which is proposed within this consultation would be published in an aggregated form (ie across the relevant sector or industry) in the same way as other data is currently published within our regular [Industry Statistics publication](#).

² With the exception of some products, such as society lotteries.

1.21 Other changes, such as potential changes to the timings of submissions which are outlined in section 6 would be considered as a more long-term approach, especially given the IT development which may be required to facilitate their implementation.

2 Proposed changes to the data elements that are common to all or some of the regulatory returns (including organisational and social responsibility information requirements)

- 2.1 This section outlines certain proposed changes to data elements that are common to all / many of the sector specific regulatory returns or the wider regulatory data collection architecture, as described in the subsections below.

Number of machines

- 2.2 Feedback gathered during the production of our bi-annual [Industry Statistics](#) publication and also from operators engaged as part of the ongoing quality assurance process for regulatory returns, indicates there are some recurring issues arising from the difference between the definitions of machines and terminals, despite the fact that these definitions are detailed within the regulatory returns guidance. The text from the current definitions is included in the box below, and a common error is that the same number is entered into both fields, often indicating an apparent breach of entitlement, for example more than four category B2s in a Licenced Betting Office (LBO) or category B3 accounting for >20% of all machines in an Adult Gaming Centre (AGC).

Machines:

A gaming machine is defined as a machine that is dedicated to a single game (eg a traditional physical reel band fruit machine, pusher or crane). Each player position is considered to be one gaming machine; therefore a pusher with five player positions would count as five gaming machines. Where the stake or prize can be altered to change the game category, but the game itself remains the same this would be considered a gaming machine. Where this is the case, you should count the highest category available when determining the average number of machines. For example, if you can switch between category C and D stakes and prizes, it should be counted as one category C machine.

Terminals:

A terminal is defined as a machine that can offer more than one game, which can be selected by the player at the time they credit the machine. Server-driven hand-held devices that offer gaming machine content should be counted as terminals. If the server system only allows for a limited number of hand-held devices to have gaming machine content enabled at any one time, it is that number that should be counted when determining the overall average number of terminals. If a terminal offers games that equate to different machine categories you should count the highest category of game available when determining the average number of terminals. For example, if a terminal offers category C and D games it should be counted as one category C terminal.

- 2.3 Upon more detailed investigation it emerges that there is typically no breach, but the same number is entered into both columns by the operator because they are unaware of the difference, effectively double-counting. Investigating this problem creates a burden for both the Commission and for operators, whom we occasionally have to contact to verify and then correct the original data they have submitted to us.
- 2.4 To alleviate this confusion we propose to amalgamate the section on all relevant regulatory return forms which will ask operators to supply a single data point for the number of machines and terminals within one field per category (eg B2, B3), thus reducing some of the potential risk of double-counting.

- 2.5 We are confident that we do not routinely require the split into the separate categories of machines and terminals, so one single (ie combined) figure will provide the level of detail required by the Commission through this collection method. Should further detail be required, for example as a result of a thematic piece of work, we propose collecting this as required through a bespoke (and targeted) data collection process with relevant operators.

Question

Q1. Do you agree with our proposal to combine the columns into a single submission for each category, in order to avoid double-counting? This would require collecting more granular detail only on an as-required basis and would be done through a bespoke (and targeted) data collection process with relevant operators.

Machine GGY categorisation

- 2.6 In the past some operators have told us that they are unable to split out GGY from machines or terminals which are capable of play at more than one category (eg a cabinet in a Licensed Betting Office (LBO) can have both B2 and B3 play and in fact customers can switch between both within a single game or session). Where this is the case, we have permitted operators up until now to aggregate GGY for a machine or terminal which has multiple categories to the highest category of play possible on that machine or terminal. In the example above this often means that all revenue is categorised as B2, although other data from machine operators indicates the detailed split is in fact readily available.
- 2.7 Machines are an area of gambling which attract a large amount of public debate, often disproportionate to the size of the available evidence base. It is one of the areas on which we are regularly asked to provide data and advice to stakeholders, including Government. The absence of an accurate split of GGY by machine category creates a risk in terms of our understanding of the distribution of GGY, meaning that we have to caveat the dataset.
- 2.8 Over the last few years we have either requested data to support specific advice to DCMS or have been involved in the facilitation of data provision from operators to expert research, such as GambleAware's research projects. This work has demonstrated to us that it is possible to split out GGY from a machine according to the category of play, or if that is not feasible then it is possible to make an accurate estimate about the breakdown of that GGY.
- 2.9 Given these considerations we propose to make obligatory the requirement for operators to accurately split out GGY, based on the actual category of play and not just the maximum category available on that machine or terminal. We think this is a realistic prospect as there are a much larger number of machines now utilising server-based technology at the premises of larger operators (which account for the vast majority of machine GGY in the LBO market). This split will lessen the requirement to estimate or caveat in our regular publications or specific advice.

Question

Q2. Do you foresee any problems in splitting out machine GGY according to the category of play?

Social responsibility

- 2.10 The social responsibility questions contained within the regulatory data architecture are of vital importance in terms of providing data for us to ensure that operators have in place suitable policies and procedures to make sure that they comply with the LCCP requirements, and can also enable operators to evidence whether they are putting the consumer at the heart of their business decisions. When published it can also raise awareness amongst consumers by helping them to make informed decisions.

- 2.11** As mentioned above, the regulatory returns system provides a platform for us to regularly collect aggregated, quantitative data, from which it is possible to undertake either macro level comparisons (eg at sector level) or time series comparisons (either at an aggregated or individual operator level) against previous figures provided.
- 2.12** During 2014, we conducted a consultation about proposed amendments to the social responsibility provisions in our LCCP. The changes we proposed reflected developments in social responsibility practice and significantly improved understanding of risk since we first published the LCCP in 2007. Some of these changes directly feed into the proposals outlined below.

Underage gambling

- 2.13** Section 47 of the Act makes it an offence to allow a child or young person to enter certain gambling premises, while section 46 of the Act creates an offence if a child or young person is allowed to participate in certain forms of gambling. These offences underpin the licensing objective of protecting children from being harmed or exploited by gambling.
- 2.14** At present we receive data from operators and other third parties on this issue in a number of ways:
- a) under LCCP condition 15.1.1 and 15.1.2 operators must inform us of an event that they *“know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition”*
 - b) the regulatory returns system asks operators to submit (dependent on their sector) data for the following, with the guidance text shown in the box below:
 - i) People who having entered the premises were unable to verify their age, and
 - ii) People who having gambled were unable to verify their age.
 - c) certain operators, dependent on their size or which licence they hold, must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to us. These events are reported to a named contact for review.

People who having entered the premises were unable to verify their age

For the period relating to the regulatory return, please record the number of people who have entered your premises and were unable to verify their age. You should record the number of occasions upon which a person was unable to verify their age when challenged, after entering the premises.

People who having gambled were unable to verify their age (non-remote)

For the period relating to the regulatory return, you should record the number of people who, having gambled, were unable to verify their age when challenged. You should not include incidents where a customer is challenged when they attempt to gamble and is refused service because they are unable to prove their age. Such instances should be reported under the ‘people having entered the premises and were unable to verify their age’ count.

People who having gambled were unable to verify their age (remote)

For the period relating to the regulatory return you should record the number of people who have gambled, and are then identified as being underage, ie they have been found to have bypassed the operator's age verification systems. It should not include individuals who have

chosen not to complete an operator's age verification procedures as this may be for reasons other than the individual being underage.

- 2.15** Both the LCCP and regulatory returns requirements are important datasets for us for different reasons, with the LCCP requirement enabling operators to provide details of where there is specific evidence of an underage breach of the Act. We do not propose a change to this requirement.
- 2.16** We note however, in terms of the LCCP notification requirement, only a handful of non-remote operators have submitted data on the number of times where there is specific evidence of an underage breach (for example where a parent returns to an operator with a betting slip which their child placed or where the operator challenges an individual who then produces a passport which confirms that they are underage).
- 2.17** The data collected through regulatory returns is slightly different and is focused on underage challenges where the outcome was that the person challenged did not or could not verify their age (ie walked away after they were challenged).
- 2.18** Our view is that within the regulatory returns mechanism, the most appropriate proxy for understanding the regulatory risk around underage gambling is a focus on "*People who having gambled were unable to verify their age*". This can provide an important metric to help us understand the success (or otherwise) of the procedures put in place by operators to stop underage gambling.
- 2.19** When it comes to the data submitted through regulatory returns, we propose removing the requirement for operators to tell us the number of times people who having entered the premises were unable to verify their age, as we think the second metric (people who having gambled were unable to verify their age) is a more suitable proxy for risk and can be directly compared across all relevant sectors. This will give us an indication of where the operator's policies and procedures may not be not working.
- 2.20** Across both mechanisms (LCCP notifications or regulatory returns), we propose to update our guidance in the lead-up to the proposed change to make it very clear to operators about which data should be submitted through which mechanism and within which particular timeframe.
- 2.21** Our view is that details of the number of underage challenges on entry undertaken by operators are best suited to collection through third party age-verification (AV) testing which is described above. We are content that in the shorter term, we will be able to use this third party test purchase data to continue to help us judge whether operators have an effective AV process in place. As with other areas, we will keep our regulatory data requirements under review.

Question

Q3. Do you agree with the proposal to remove the requirement to provide "*People who having entered the premises were unable to verify their age*" from the relevant non-remote forms?

Customer incidents, on gambling premises (directly related to gambling activity) requiring police assistance

- 2.22** Operators currently have to provide details of the number of times the police are called to gambling premises during the reporting period and we regard this as an important proxy for risk relating to the licensing objective “*preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime*”.
- 2.23** At present, this number is not split down by individual product or specific reason why the police are called, in large part due to the difficulties which operators may face when it comes to correctly codifying incidents between individual products. For example, a customer may have been playing a number of products (such as machines and betting over-the-counter) or engaged in a number of different activities before the incident requiring the police to be called occurred. Any data collected in this way will inevitably come with a significant caveat around the accuracy of the split.
- 2.24** With this in mind, we propose retaining the current requirement within regulatory returns, as this will enable us to continue to benchmark this high-level metric as a proxy for risk to the relevant licensing objective.
- 2.25** Within the [responses](#) to our consultation into [the prevention of crime associated with gambling](#), we indicated that we would look into this in more detail. Given the importance of this topic, we feel that the data currently collected through regulatory returns on its own, while important in providing an overall proxy, is not able to provide us with the granularity required for an in-depth understanding of the risks in this area.
- 2.26** For this reason we wish to consider alternatives as being required to provide the levels of granularity, accuracy and qualitative data which we need. These alternatives may take the form of one of the following options:
- a) expand the data requirements through regulatory returns to provide more granular detail (which may include metrics such as the number of violent incidents or the number of times machines are damaged by customer actions)
 - b) undertake a targeted, thematic piece of work outside of regulatory returns to consider additional or in-depth data from operators, which may include metrics outlined immediately above but would also provide an opportunity for operators to submit qualitative context to the data provided.

Questions

- Q4. Which of the two options outlined in paragraph 2.26 do you think would provide the best and most useable data to provide the Commission with an in-depth understanding of the risks in this area?
- Q5. Do you have any alternative approaches which would provide the Commission with the levels of granularity, accuracy and qualitative data which we need?
- Q6. What are the most useful metrics available to operators in terms of the number of times police are called to gambling premises? For example the number of violent incidents or the number of times machines are damaged by customer actions.

Suspicious activity reports (SARs) and discontinuation of customer relationships

- 2.27** Operators are required to complete SARs in the event of having knowledge or suspicion that a customer is engaged in money laundering, and they must also report the unique reference numbers (URNs) of SARs to the Commission. At present operators have to provide us with details of the number of SARs submitted in reliance on their licence(s) held, through two methods.
- 2.28** The first method of notification is through the key events system through which the operator has to enter details of the relevant URN assigned to each individual SAR. This process means that operators have to tell us within five working days of the submission of a SAR, and they are also required to provide the URN relating to that SAR.
- 2.29** Also, the regulatory returns system requires operators to report the total number of SARs submitted within the relevant reporting period (either quarterly or annually depending on the size of the operator in question or the licence(s) held). As discussed above, the regulatory returns system does not allow for the ability to provide a great deal of qualitative data and therefore it is not possible to submit any further details through this process (such as the relevant URN for each SAR etc).
- 2.30** Having assessed the most relevant method of submission, we propose removing the requirement for operators to report the total number of SARs submitted within the relevant reporting period through regulatory returns. We will continue to require operators to inform us through the key events system on a SAR by SAR basis.
- 2.31** In addition, our consultation into [the prevention of crime associated with gambling](#) identified the issue of whether operators are continuing commercial relationships with customers after the submission of a SAR. A licensee may decide to terminate a business relationship with a customer if the licensee believes the customer is involved in money laundering or that by continuing, the licensee risks committing money laundering offences under PoCA. We are interested in information about any customer relationships discontinued for those reasons because it is useful to us in developing a clear understanding of money laundering threats and trends in the gambling industry.
- 2.32** At the time we proposed the following approach:
“An addition to the licence condition for key events, requiring operators to report on the number of cases where they discontinue a customer relationship because of money laundering concerns, for the reasons above”.
- 2.33** Within the [responses document](#) (published in May 2016) we set out the following position in relation to discontinued relationships as a result of money laundering concerns.

The Commission's position:

We will consider further whether we wish to gather information on discontinued customer relationships due to AML concerns as part of a review of our Regulatory Returns later this year, as such information may help the Commission to track trends in incidents across sectors and develop a clearer understanding of threats in the gambling industry.

It is not part of our approach to use information such as numbers of discontinued customer relationships in isolation to compare the performance of different operators. However, we can and do use such information to identify and begin to understand variations between licensees of similar size and business model.

We confirm that we are interested only in information about relationships discontinued for money laundering concerns - that is, as a result of a decision by the licensee that there was a risk that money laundering offences might otherwise be committed. We do not consider that information about other types of discontinued relationships would be helpful to us at this stage.

Licence holders do have a requirement to notify us of the Unique Reference Number (URN) of any SAR they submit under existing regulations, but this information does not include whether or not they have discontinued the customer relationship. Nor does submission of a SAR automatically mean that an operator has discontinued a customer relationship, and vice versa. Although we have the URNs of SARs, we are prohibited from routinely requesting any further information about these reports from the NCA. Access and review of SARs material is strictly monitored by the NCA and is explicitly prohibited for regulatory purposes. Therefore, in order to learn about numbers of discontinued relationships we need to collect this information separately.

Having considered all of the responses, we do understand some of the concerns licence holders expressed regarding the burden of raising an individual key event report every time a customer relationship is discontinued for money laundering concerns. We agree with respondents that it would be more proportionate to report such numbers via a regular report such as the Regulatory Returns, rather than as individual key events. We will be reviewing our Regulatory Returns requirements later this year and will pick up this topic with a view to including it as part of that review.

- 2.34** We have been considering further whether regulatory returns is the correct way to collect this information. Having weighed up the counter argument around proportionality against collection of the most relevant data which can help us to understand regulatory risk within the market, we are proposing an alternative option. This option asks operators to indicate (via a check-box) whether they have discontinued the customer relationship at the same time as they notify us of a submitted SAR (including appropriate consent) as a key event. This will also help alleviate the risk which was identified within the engagement to date around relationships which are discontinued for reasons other than money laundering concerns:

"[Operators] in the non-remote and remote casino sectors have a responsibility to discontinue customer relationships where they are unable to complete customer due diligence measures for that customer, which might be because the customer did not wish to provide information rather than because of money laundering suspicions."

- 2.35** We believe this will minimise any additional burden on operators, as it will only require them to put a check in the relevant box at the same time as when they are required to submit the SAR and its URN through key events in eServices. This solution does not make the notification of a discontinued relationship a separate key event in its own right.

Questions

- Q7. Do you agree with the removal of the SAR question from the regulatory returns system, thus reducing duplication?
- Q8. Do you foresee any issues with the change of a key event notification regarding the submission of a SAR (including appropriate consent) to include information on whether a customer relationship has been discontinued?

3 Proposed harmonisation of certain data across both the non-remote and remote forms

- 3.1 At present there are some examples of data collection within regulatory returns for particular products which are not uniform across both non-remote and remote forms. This section considers the case for some harmonisation, where relevant.

Turnover, payout and GGY/gross profit

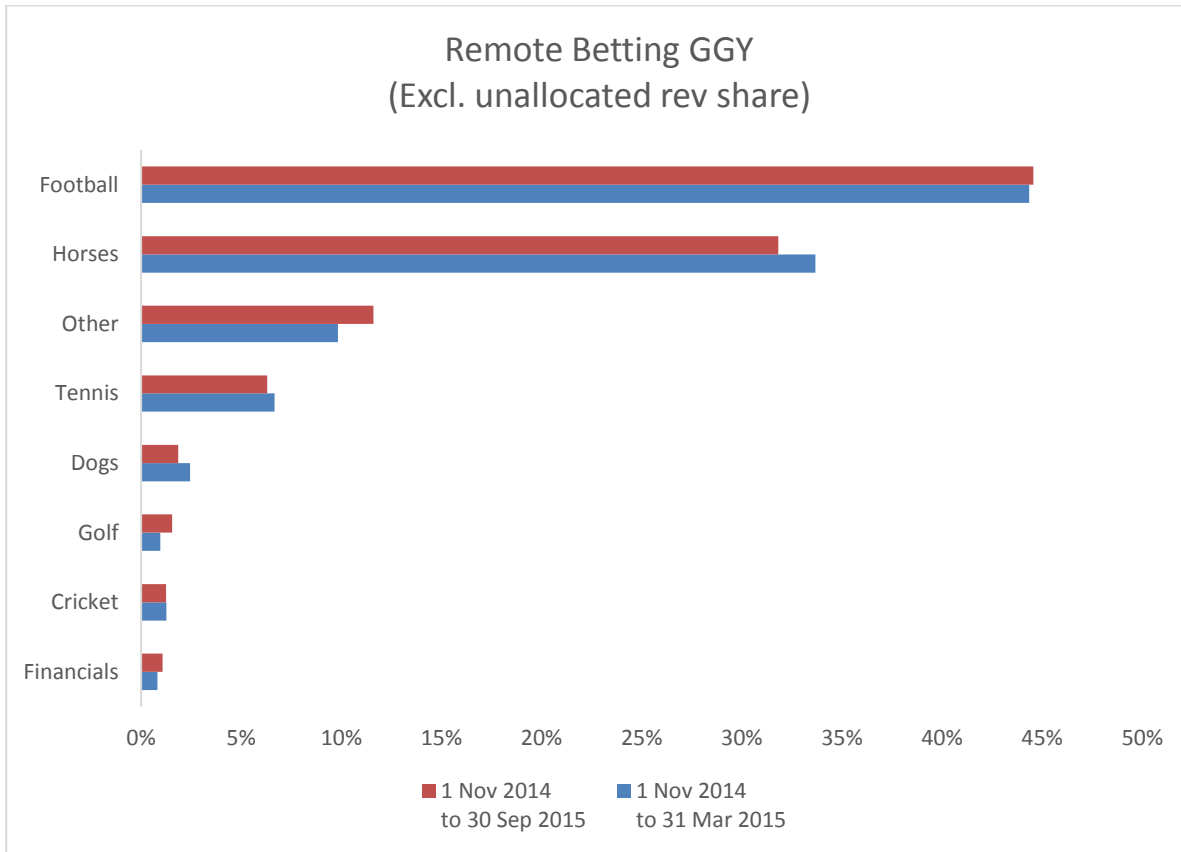
- 3.2 The remote casino, betting and bingo (RCBB) form in certain parts asks for operators to complete details of their turnover *and payout* for various relevant products. This data enables us to calculate a GGY figure.
- 3.3 This approach does not reflect the current data requirement for various non-remote forms, which require operators to complete details of their turnover and GGY / gross profits.
- 3.4 In order to make it as simple as possible for operators to easily and accurately provide the relevant data we require, we wish to standardise, where possible, the data reporting requirements across both remote and non-remote forms. This process will increase the overall efficiency and reduce the margin for error in terms of inaccurate regulatory returns.
- 3.5 We are therefore proposing an update to the RCBB form to require remote operators to tell us details of turnover and GGY for the relevant products. This would remove the requirement for providing payout data.

Question

- Q9. Do you agree with the change to require (where relevant) turnover and GGY details on the RCBB form?

Split by sports (betting)

- 3.6 According to our latest [Industry Statistics](#) publication, in terms of remote betting the 'Other' category has the third largest GGY after football and horses. Indeed, the category is almost twice the size of the next largest (tennis) and is considerably bigger than the remaining categories (dogs, golf, cricket and financials). The percentage split by sports betting GGY from the two Industry Statistics publications which report on the market after the Gambling (Licensing & Advertising) Act 2014 is shown in the chart overleaf.



3.7 Empirical evidence indicates a widening in popularity of other sports, with one operator recently indicating that basketball was now their fourth most popular online³ sport. Based on this, we would like to seek stakeholder feedback on the current list of sports contained within the RCBB form. We are mindful of striking the correct balance between a greater split of sports in terms of collecting data which can help fully inform the Commission (and other stakeholders) and any additional burdens associated with a more wide-ranging data collection. Please note that you should outline your views on eSports in the corresponding section of this consultation.

Remote	Non-remote ⁴
Football	Football
Horses	Horses
Dogs	Dogs
Tennis	Other
Golf	
Cricket	
Other	Numbers

3.8 We would also like to seek views on whether we should ensure that the same sports are represented on both the RCBB, non-remote betting and the betting section of the 2005 casino form. The current split across both remote and non-remote is shown in the table above.

³ Ladbrokes plc – [Interim results for the half year ended 30 June 2016](#).

⁴ For both the non-remote betting and relevant for those operators holding a non-remote 2005 Casino licence which entitles them to betting

Questions

- Q10. Do we have the correct mix of sports for betting on both the RCBB and the non-remote betting form (including Other)?
- Q11. Should we ensure the same sports are represented on both the RCBB form and the non-remote betting form?

Split by games (casino)

- 3.9** To aid our reporting and the accurate collection of data across both remote and non-remote channels we wish to replicate some of the game categories from the non-remote casino return onto the casino section of the RCBB form. The table below shows the current product categories and also lists the proposed categories.

Current list (Remote casino)	Proposed list (Remote casino)
Card games	Roulette
Table games	Blackjack
Slots	Slots
Other	Other

- 3.10** Our initial engagement with operators indicates that this solution will reduce confusion on the part of operators and enable the publication of more accurate data about this market.

Question

- Q12. Do you agree with the changes to harmonise the casino section of the RCBB form with the relevant products used on the non-remote form?

4 Proposed changes to the sector specific elements

- 4.1 The following section of the document outlines proposed changes to some of the sector-specific elements of our regulatory data collection, including those data points which are required for our review of the fee structure.
- 4.2 During July 2016 DCMS and the Commission published a joint consultation outlining proposals to change the ways in which fees are calculated for non-remote operators in several sectors, moving to GGY as the metric for categorising fee bands. Other types of licence would continue to be categorised by gross value of sales, or revenue.
- 4.3 Consequently, those non-remote licence types which are currently banded by premises numbers or premises size would instead be banded by GGY. These include: bingo, general betting (standard), adult gaming centre, family entertainment centre and 2005 Act casinos. The changes will be subject to ministerial and parliamentary approval but if agreed would come into effect from April 2017.
- 4.4 For this reason we would require a complete view of all GGY (or equivalent) generated in reliance on an operating licence, across all licence types. This data will ensure that all operators are within the correct fee category for the licence(s) they hold, based on the overarching principle guiding fee-setting which is that the amounts individuals and organisations pay in fees should reflect the costs that the Commission incurs in carrying out its functions in respect of regulating those gambling activities.
- 4.5 We also require this data to ensure our relevant publications such as [Industry Statistics](#) are as accurate as possible, as they are used to inform consumers that operators are acting in accordance with their licence obligations, as well as underpinning our advice to Government.
- 4.6 As part of our proposals for changes to regulatory returns, we have identified three individual data points from two sectors where we have not previously explicitly asked for data which would contribute to operator revenues in reliance on their licence.
- 4.7 We propose to ask operators to submit these data points through regulatory returns, where relevant to their business. The 'missing' data points are covered in more detail within the following relevant sub-sections:
- Arcades - Adult Gaming Centres (AGC) and Family Gaming Centres (FEC), and
 - Gaming Machine & Technical (GM&T), Remote and Non-remote.

Arcades (AGC and FEC)

- 4.8 We have identified the absence of financial data in respect of prize gaming⁵ which takes place within arcade premises and we are therefore proposing to include a single question on the regulatory return asking for annual GGY derived from prize gaming in reliance on the AGC or FEC operating licence.
- 4.9 We do not consider that the inclusion of this single extra data point will pose a significant extra burden upon operators for two reasons:
- prize gaming is not prevalent in the majority of AGCs, so this field will not need to be completed by most operators who currently fill out an AGC regulatory return, and
 - collection of this data should not represent a new burden by virtue of the fact that operators would already reasonably be expected to collect and submit such data to HMRC for the calculation of gaming duty liabilities.

⁵ S288. Gaming is prize gaming for the purposes of this Act if neither the nature nor the size of a prize played for is determined by reference to-

(a) the number of persons playing, or
(b) the amount paid for or raised by the gaming.

Question

Q13. Do you agree with the inclusion of a question to include details of GGY attributable to prize gaming?

- 4.10 The regulatory returns for AGC and FEC are the only ones which currently ask operators for details of their (maximum and minimum) seasonal employees.
- 4.11 We have never needed to undertake a detailed analysis of this data and we don't routinely publish it as part of Industry Statistics, unlike total number of employees which is published for each relevant sector.
- 4.12 As we have not had to use or publish the data related to seasonal employees to date, we propose to remove it from the regulatory returns form.

Question

Q14. Do you agree with our proposal to remove the seasonal employee question from the AGC and FEC forms?

Gaming machine and technical (GM&T), remote and non-remote

- 4.13 The current GM&T form does not have financial data relating to revenue generated by operators holding a GM&T licence in terms of maintenance and the sale of kits, as there is no specific section on the current form to allow operators to enter this revenue.
- 4.14 However, it has become clear in undertaking quality assurance checks that some operators include this revenue as a constituent within the 'Revenue' field. The inconsistency in completing this section of the return has caused both confusion for operators and also means that potentially we do not have a full picture of operator revenues in reliance on their Commission licence.
- 4.15 We believe that by adding 'Maintenance and sale of kits' as an additional revenue field within regulatory returns we can address both the inconsistency and completeness of data issues and make it simpler and quicker for those operators who undertake maintenance or supply kits in reliance on their GM&T licence to complete the return correctly.
- 4.16 We have considered whether there should be separate returns for holders of non-remote and remote GM&T licences so that we can obtain a clear picture of the revenue derived in reliance on each licence. However we are mindful that this would put an additional burden on those operators who hold both licences. We are therefore proposing to obtain the information required by introducing a question that will ask holders of both licences to tell us the split of their total revenue between the two licences.
- 4.17 By making these proposed changes we will:
 - a) ensure that we have a full understanding of operator revenues in reliance on their Commission licence – and can also ensure that operators are in the correct fee category, and
 - b) be able to report accurate figures through publications such as our [Industry Statistics](#).

Questions

- Q15. Do you agree with our proposal to add a revenue field to capture revenue from maintenance and the sale of kits?
- Q16. Do you agree with our proposal to include an additional question on the form to report the split of revenue between remote and non-remote means rather than introducing a separate form for each licence?

Society lotteries (remote and non-remote)

- 4.18** Operators who hold a remote or non-remote society lottery licence currently submit draw-by-draw data to us on their total sales, total prize fund, amount returned to good causes and the amount allocated against expenses.
- 4.19** By collecting this data we are able to ensure compliance with the mandatory conditions of lottery operating licences as described by section 99 of the Gambling Act 2005, which are described below:
- a) minimum 20% of total proceeds are returned to good causes
 - b) individual proceeds cap of £4m per draw
 - c) annual proceeds cap of £10m, and
 - d) maximum single prize of either £25,000 or 10% of the value of total sales for that draw.
- 4.20** The current database architecture requires the submission of data from operators which can enable us to validate that conditions a, b and c outlined above are being complied with. The system requires data about the total prize fund but not about the single biggest prize (ie to validate that condition d is being complied with), as the potential distribution of prizes is not clear from the figure provided.
- 4.21** Although there is little evidence to date which may indicate that breaches of this condition have taken place, we identified the lack of data collection in this area as a potential weakness in our data architecture as part of our advice to DCMS on the society lottery market during January 2016.
- 4.22** We are therefore proposing to require holders of remote and non-remote society lottery licences to submit an extra data point showing the largest single prize within each of their existing draw-by-draw returns.
- 4.23** In addition, we are asked on an ongoing basis to provide advice on the Culture, Media and Sport Select Committee's Inquiry into Society Lotteries and the subsequent DCMS response. As part of this advice we have reviewed the regulatory returns form and identified a requirement to collect supplementary data through the regulatory returns process on a handful of other products which are sold by operators in reliance on their Commission licence.
- 4.24** In order for us to fully understand the evolving size and product mix of the society lotteries market we require total proceeds data from operators for the key product groups, data which is not identifiable through the current architecture (other than we currently expect operators to tell us which products they sell and how often).

- 4.25** To address this deficiency we propose requiring operators to indicate, via a check-box next to each line of data currently submitted (on a draw-by-draw basis), which product group the data relates to eg raffle-style draws, subscription, scratchcards or vending machines. We consider this to be the best way in which we can minimise the extra burden on operators whilst providing us with the granularity of data we need to exercise our regulatory functions in this area.
- 4.26** This proposed requirement will supersede the need to validate the product categories by frequency, which is currently required through the regulatory returns system. We therefore propose the removal of this question, which is shown below.

3c. Types of lottery						
	Instant win	Daily	Weekly	Monthly	Six monthly	Annually
Subscription	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Scratchcard	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vending machine	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Raffle style	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Online (remote)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 4.27** As part of this process we have also identified a question within the regulatory returns form which replicates the data provided to us on a draw-by-draw basis by society lotteries. These questions under section 4a require operators to provide an annual total sales figure for remote draws (the total remote ticket sales/proceeds (£)) and the total number of draws (total number of remote lotteries managed). For this reason of duplication, we propose removing these questions from the regulatory returns form.

Questions

- Q17. Do you foresee any problems reporting the maximum prize alongside other data, or type of product which is already submitted?
- Q18. Have we missed any important products from the list for society lotteries (ie those which will form the check-boxes)?
- Q19. Do you agree with the removal of the following questions as the data is replicated elsewhere:
- the total remote ticket sales/proceeds (£)
 - total number of remote lotteries managed.

External Lottery Managers (ELMs), remote and non-remote

- 4.28** As part of our ongoing requirement to feed into the DCMS review of the society lottery market, we have also been asked to explore the possibility of collecting the total sales breakdown of ELM-managed products split out in the same way as we are proposing in the society lottery section of this document, with the addition of online (remote) as a separate category.
- 4.29** This proposal would require ELM licence holders to complete a table showing their annual managed proceeds split by product type, as shown in the following example table.

Product category
Raffle-style draws
Subscription
Scratchcards
Online (remote)
Vending machines

Total Sales Managed (£)

4.30 Collection of this data will enable the Commission to delete the current question on the ELM form which asks about the frequency of draws managed by product category, which is shown below.

3c. Types of lottery						
	Instant win	Daily	Weekly	Monthly	Six monthly	Annually
Subscription	X	X	X	X	X	X
Scratchcard	X	X	X	X	X	X
Vending machine	X	X	X	X	X	X
Raffle style	X	X	X	X	X	X
Online (remote)	X	X	X	X	X	X

4.31 This is because we believe that the total proceeds figure is a better proxy indicator for risk than simply frequency of draws. For example, a frequently undertaken draw with very small ticket sales may have a different risk profile to a six-monthly draw with very large ticket sales. The existing question structure does not provide this distinction.

Question

Q20. Do you agree with our proposed list of product categories, or do you have any others which should be considered?

Bingo, non-remote

4.32 The current non-remote bingo form does not specifically ask operators to split out any revenues which are derived from customers using Electronic Bingo Terminals (EBTs), either across the 'machines' content or whilst participating in bingo games such as main stage bingo. EBTs enable players to purchase a larger number of tickets than they would usually be able to handle from playing on paper and can also contain other gambling-related content such as slot games.

4.33 We recognise that use of EBTs has grown over recent years, and their popularity continues to increase. Although EBT revenue is currently captured within the bingo regulatory returns form, it is subsumed within the other constituent parts of the form and it is not currently a requirement for operators to split out EBT revenues in the same way as the section applying to Video Bingo Terminals (VBTs).

4.34 This will provide us with more accurate information, which we will use to form assessments on the risk to the licensing objectives of the changing landscape of bingo activities. It will also enable us to publish more accurate Industry Statistics.

Question

Q21. Do you agree with the proposal to split out revenues derived from EBTs?

Betting, non-remote

Self-service betting terminals (SSBTs)

- 4.35** Several of the largest non-remote betting operators⁶ have indicated that they are rolling out an increased number SSBTs across their licensed betting office (LBO) estate. At present our regulatory data collection does not require any detail on the numbers of, or GGY derived from SSBTs in LBOs.
- 4.36** Given the increasing importance of SSBTs within the product mix for many operators, we believe that it is important for us to have an ongoing understanding of the volumes of GGY generated in reliance on these products.
- 4.37** We therefore propose to include a section on SSBTs within the non-remote betting form, to include requesting the average number of terminals and also a GGY split to match the products used elsewhere within the off-course section of the form (dogs, football, horses, numbers and other).

Questions

Q22. Do you agree with the proposed inclusion of separate questions for SSBT numbers and GGY?

Q23. Do you agree with the list of sports outlined for collection within this section?

Gambling management tools

- 4.38** LCCP social responsibility code provision 3.3.3 applicable for operators holding a non-remote betting licence states that “*licensees must ensure that any B2 machines that they make available for use require customers to make an active choice whether to set time and monetary thresholds for customer and staff alerts*”.
- 4.39** The [ABB Responsible Gambling Code](#) outlines a mandatory requirement for members which states that “*All players must be subject to mandatory reminders for every 30 mins played or £250 added to the machine*”. The code also allows for players to set a “*custom voluntary limit at any stage during play if they do not choose to do so before*”.
- 4.40** We propose collecting the data on the number of times voluntary limits are set by customers, as this metric will provide a proxy from which we are able to benchmark the uptake by customers of this gambling management tool, as well as assuring operator compliance or informing other social responsibility work which may be required in this area.
- 4.41** We are mindful of the fact that this metric relates to the number of instances (and not the number of individual customers), although it is important to collect in order to help us benchmark the uptake of voluntary gambling management tools on machines.

⁶ Ladbrokes plc, [trading update](#) for the three months ended 31 March 2016. “BGT to provide 500 self-service betting terminals to Coral”, GamblingInsider (14 March 2016).

Question

Q24. Do you foresee any issues with reporting on the number of times which time / money limits are voluntarily set by customers?

Number of slips

- 4.42 We currently require operators to tell us the number of slips taken in relation to each product on the non-remote betting form. We do not publish this data and have taken the view that this metric no longer satisfies all of the criteria to warrant collection from all operators.
- 4.43 We therefore propose to remove it from the form – should we require it on an individual operator or case basis then we would collect it directly.

Question

Q25. Do you agree with the proposal to remove 'Number of slips' from the non-remote betting regulatory returns form?

Remote

- 4.44 We undertook a consultation about regulatory returns submitted by operators holding a remote (betting, bingo or casino) licence, as well as those holding gambling software licences in October 2013.
- 4.45 During that consultation process we identified and subsequently implemented a number of additional data requirements of operators to develop our understanding of the market including:
- a) information on revenue share agreements, and
 - b) the split between data on GB and non-GB customers.
- 4.46 Since the changes were introduced we have been assessing the requirement for, use of and knowledge gained from the data submitted by operators on the current remote regulatory return (RCBB). This exercise has indicated a number of areas where we think we could recalibrate the data requirements, to enable us to focus our efforts on the collection of key data, submitted at the right time through the correct mechanism.
- 4.47 These various changes are listed below and for ease of reading are split out into three distinctive areas: data which is proposed for removal, data which is proposed to be amended and data which is proposed as an addition to the current requirements.

Data which is proposed for removal (Remote)

Customer funds

- 4.48 One section of the current RCBB form asks operators to submit details of customer funds held by the operator. The current guidance says "*Funds held in customer accounts: include all funds in accounts that customers could use to gamble on facilities licensed by the Commission. This should incorporate funds held in all accounts regardless of whether they are active, dormant or suspended accounts*".

4.49 We have previously consulted on plans to introduce a more robust customer funds reporting process. Following these consultations, we confirmed that the requirement for remote gambling operators to submit regular reports to us on the level of customer funds assets and liabilities would be introduced on a phased trial basis in 2016, starting with the operators holding the largest amounts of customer funds.

4.50 This phased trial process is currently underway with a number of operators in-scope and a final decision to be made on its roll-out. If the outcome is to fully implement the new customer funds system, we aim to remove the customer funds question currently within the regulatory returns system. This is because we believe the new system will provide the necessary level of detail which is not currently possible through the regulatory returns system.

Question

Q26. Subject to the outcome of the phased trail process, do you agree with the removal of the customer funds question from regulatory returns?

Trading and domain names

4.51 Both 'Trading names' and 'Domain names' are sections of the current regulatory return and within them we ask operators to confirm details of both trading names and domain names. We also ask for this information as "key events" within the eServices system where there have been any changes to trading or domain names.

4.52 Having reviewed the data provided via both mechanisms we believe that the structural characteristics of eServices, including the fact that we benefit from submission of this data in a time-sensitive manner and the fact that additional information can be submitted at the same time as the key event, make a strong case to remove the relevant sections from the regulatory return. This therefore avoids unnecessary duplication and retains the need to notify changes to Trading and Domain Names as key events. As such we propose removing the requirements for both from regulatory returns.

Question

Q27. Do you agree that trading names and domain names reporting sits best within key events and as a result should be removed from regulatory returns?

Customer demographics

4.53 We introduced a voluntary field for operators to report customer demographics following the 2014 review of the RCBB form. This was at a time when we were still finding out details of the market from newly licensed operators and were looking to triangulate any data collected through our participation surveys.

4.54 Since the 2014 review of the RCBB form we have developed our quarterly participation data. Although the demographics coding has remained the same throughout the period (to ensure consistency and comparability), work has been undertaken to ensure that we are reaching a more representative sample of the population in order to make the participation data as robust as possible.

4.55 The development of our participation data, as well as the demographics data which will be published through other sources (such as within the forthcoming Health Survey for England and Scottish Health Survey) has diminished the requirement for its collection through regulatory returns. We therefore propose to remove this question from the RCBB form altogether

Question

Q28. Do you have any objections to our proposal to remove the voluntary question about customer demographics?

Other remote events

4.56 The 'remote events' section of the RCBB form was designed to enable operators to provide us with details of one of the following types of event which has taken place during the reporting period. Please note that these are relevant for some other returns which do not distinguish between remote and non-remote (such as society lotteries).

- a) change controls
- b) software defects
- c) system outages or malfunctions
- d) RNG failures
- e) system security issues.

4.57 Since the last changes to this section of regulatory returns, we have continually updated and improved the list of key events which we require operators to submit. Our current guidance is shown below.

Licence condition 15.2.1 requires the reporting as a key event (key event 25) of any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.

We use information reported on this condition to monitor ongoing compliance and evaluate risk across the sector. Should themes emerge that would be of value to share with the sector (such as specific attacks targeting a number of operators) this may be fed back to help operators deal with emerging threats.

The types of event which may be reportable in relation to incidents affecting the confidentiality, integrity or availability of customer data and gambling systems are explained below.

This is primarily for remote operators, however, the licence condition applies to all operators and would include an information security breach for any operator who holds electronic records of customer information or gambling transactions.

Types of incidents

Whilst not exhaustive, the list below gives some common examples of incidents which may impact on the confidentiality of customer data or the availability of accounts:

- infection by viruses or malicious software
- theft or damage of computer equipment
- attacks by unauthorised outsiders resulting in network penetration
- unauthorised access (internal or external)
- unauthorised or accidental disclosure of customer data
- staff or third party misuse of customer data
- denial of services attacks
- customer impersonated fraud (identity theft).

4.58 As a result of this review, we now consider that these five areas are either covered by the existing key events or will be covered by the addition of a new key event (as discussed below) specific to RTP faults (see paragraphs 4.79 onwards for further details of this proposed additional key event).

4.59 We therefore propose to remove the “remote events” section from the relevant regulatory return forms.

Question

Q29. Do you agree with the Commission’s proposal to remove the “remote events” section from the relevant regulatory return forms?

Data which is proposed for amendment (remote)

Jurisdiction

4.60 As a result of the Gambling (Licensing and Advertising) Act 2014, we sought to focus upon the regulatory risks around operator group revenues derived from other jurisdictions. Our position at the time was set out in the blog section of our website and is shown in the box below.

Business to consumer operators

The Commission will be asking B2C businesses to tell us about any market where they get 3% or more of their total revenue from players or in the case of operators with total revenue of less than £5m per annum – any markets they are targeting where the revenue is more than 10% of their total revenue. The percentage applies to the entity seeking a licence.

For each of these markets, the Commission will ask operators why they think provision of gambling facilities is not illegal either because they are licensed to operate in that jurisdiction or because they have satisfied themselves that it is not illegal for them to provide gambling facilities to those players. If businesses are relying on legal advice as part of evidence of responsible due diligence we will expect businesses to tell us who they have been advised by – we will not expect to see legal opinions as such but will wish to understand the legal rationale.

In line with our aim to ensure probity and responsible behaviour we also want businesses to tell us about any additional markets (ie those with less than 3% or 10% revenue as appropriate) they are actively targeting in order to grow their business. By actively targeting we mean, for example, that the home page is directed towards a jurisdiction and is in that jurisdiction's language and/or that jurisdiction's currency can be chosen and/or payment methods available include those only available in that jurisdiction and/or the homepage has a customer service for that jurisdiction or material aimed at particular countries. This tells us about any deliberate/active marketing to jurisdictions where that might be illegal for the operator to supply into the country or for the player to use the services not covered by the 3%/10% requirement above.

As mentioned above, for licensing we are not asking, as a matter of course, B2C operators to give us any information about markets which they are not actively targeting and which provide less than 3%/10% thresholds. However, we would expect a responsible operator to assess the consequences of their continuing to receive a noticeable stream of income from any jurisdiction where there are real doubts about the legality of their providing gambling services to its population. We would not expect the operator to continue to supply those services without considering the applicability and enforceability of such laws to both operator and player. Where no justifiable arguments exist to continue with such activities, we would expect the operator to make reasonable attempts to stop such access. Clearly in such circumstances should an operator not take reasonable steps to stop such access it may reflect on their integrity and therefore continuing suitability. We accept there will always be some players who deliberately flout domestic legislation but responsible operators could be expected to take reasonable steps to discourage this.

The key for us, whether or not levels of business fall below the thresholds or an operator is actively targeting growth in that market, is that due care is undertaken. We would expect operators to have a reasonably coherent rationale for what they are doing. Operators are expected to keep the licensing objectives in mind when making business decisions. It will not be acceptable to hide behind wilful ignorance or implausible assumptions or arguments at the application stage or subsequently, but at application stage we will only seek the assurances and information detailed above, unless of course the responses raise concerns which need following up.

Business to business operators

As is the case with our assessment of a B2C operator, we have an interest in the financial risk of a B2B operator seeking a licence (in terms of both its ability to meet its financial obligations and its dependency on revenues derived from particular markets) and in the probity of the B2B operator (including where a material proportion of revenue is likely to be from sources that we deem to be unacceptable). B2B operators typically provide gambling software to one or more B2C operators or other B2B operators. B2B operators may also provide facilities for gambling to one or more B2C operator as in the case of platform or network providers. Some of the B2B and B2C operators contracting with the B2B operator applying for a licence will themselves provide facilities for gambling and/or gambling software to the British market. We have a strong interest in deterring those we license (either B2B or B2C operators) from supporting in any way those who compete illegally with Commission-licensed B2C operators servicing the British market.

We will ask the B2B applicant to explain where its revenue comes from by setting out approximately what proportion of revenue comes from: (a) operators with point of consumption licences in jurisdictions other than Great Britain (such as France and Spain); (b) from Commission licensed operators; and (c) from other operators where the B2B applicant may be uncertain about the players' locations. We will ask the B2B applicant how it decides to whom it will deal with (ie what process does it go through and what contractual constraints does it impose on its clients, for example requiring operators to block players located in the US) and whether or not it implements any technological or other protections itself.

It is also going to be a licence condition in all gambling software licences issued by the Commission that the B2B operator licensed by us undertakes to secure contractually with its B2C operator clients that any British-based player accessing the network/platform does so via a Commission licensed B2C operator and that, from 31 March 2015, any gambling software used by a Commission-remote operating licensee must be manufactured, supplied, installed or adapted by the holder of a gambling software licence. We acknowledge that: (a) some business models will not provide the B2B operator with the location of a player; and (b) that technology tracking player location is not wholly effective, but the sort of licensing regime that a B2C operator is subject to may enable some inferences to be drawn. In such circumstances, there is also an increased importance placed on the B2B operator understanding the business of the B2C operator it supports.

- 4.61** Since this time, we have been collecting data on jurisdictions through both LCCP notifications and separately through regulatory returns, albeit that each has a slightly different focus.
- 4.62** In terms of LCCP notifications, an amendment was made to licence condition 15.2.2 which came into effect in May 2015, as shown below. This does not have the 3% cut-off and applies to all companies within the group.

“Licensees must also notify the Commission ... their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised.”

- 4.63** In terms of regulatory returns, operators have to select a list of jurisdictions and indicate their percentage of revenue derived from those locations, as well as other jurisdictions being actively targeted, regardless of whether or not they exceed the 3% / 10% total⁷. Importantly, as regulatory returns are specific to the licensed operator, the jurisdiction question does not apply to the wider group. In all areas of regulatory returns we have been clear that the data must relate only to the licence holder submitting the return itself (ie the data is solely in reliance on their licence held).
- 4.64** The current provision of data provides a percentage split of revenues (through regulatory returns) at an operator level, but we are mindful that this does not represent the wider picture of the group. Conversely, it also provides (through LCCP notifications) an historical view of jurisdictions in which the group has advertised, but does not provide any indication of the magnitude of group revenues within those jurisdictions.
- 4.65** Within this question in particular, we are mindful of the issues around proportionality, namely balancing the competing dynamics of requiring more data from operators and at the same time managing any regulatory burden placed on them.
- 4.66** We therefore propose a solution which would make a slight change to the LCCP notification to indicate either when the group begins advertising to a new jurisdiction, or the 3% / 10% jurisdiction threshold being passed for the group (which could be done by any group company holding a Commission licence). The requirement would be to notify us at such a time as the group becomes aware of the change, and would focus upon a significant or sustained change in the group's revenue profile by jurisdiction. For this rationale we would expect that it would be reported against a usual reporting period for the group and would relate to an appropriate time-period (for example annually or quarterly), dependent on factors such as the size or organisational structure of the group.
- 4.67** This proposed solution would subsequently enable us to remove the jurisdiction question from the regulatory returns form.
- 4.68** We are keen to avoid operators having to inform us of a relatively small-scale or short-term change in revenues from a particular jurisdiction, for example if group revenues derived from a particular jurisdiction just exceeded the 3% threshold, but where they do not expect this will apply in the future on a sustained basis. Examples may include a particular sporting event or a series of results which are a one-off or would not be expected to be repeated, as we would wish operators to focus on significant or sustained changes in their business model or revenue profile by jurisdiction.
- 4.69** Given the complexity of this area, we encourage stakeholder views on our proposed solution, in particular around the 'significant change in the group's revenue profile' (by jurisdiction).

Question

Q30. What are your views on our preferred option for the provision of group jurisdictional revenue information to the Commission, and why?

In-play

- 4.70** We have recently published our [position paper on in-play](#), which updates the paper we published in March 2009.

⁷ Where total GGY is >£5m per annum, please report each jurisdiction where GGY from that jurisdiction is 3% or more of the operator's total. Where total GGY is <£5m per annum, please report each jurisdiction where GGY from that jurisdiction is 10% or more of the operator's total.

- 4.71** By in-play betting (also known as in-running or live betting), we mean placing a bet while the event to which the bet relates is actually taking place, for example, placing a bet on a football match while the match is being played. This form of betting takes place mainly, but not exclusively, on sporting events.
- 4.72** In-play betting is predominantly an online activity, where bettors place bets using a betting operator's website. Bets can be placed via sportsbooks that offer fixed odds in-play betting, and through betting exchanges that facilitate in-play betting between two or more parties. Bets can also be placed in betting shops (through over the counter transactions and via self-service betting terminals) and by telephone.
- 4.73** In-play betting continues to grow in popularity - the number of in-play markets are expanding and a significant volume of betting takes place in-play. Our gambling participation survey data from 2015 shows that 25% of online gamblers had bet in-play within the preceding four-week period. From November 2014, we began collecting data on all operators holding a licence to supply the British market, and indications from this show that in-play betting accounts for over one-third of online betting GGY.
- 4.74** Our position paper concluded that we will continue to monitor the development of in-play betting and associated risks in accordance with our intention to be an evidenced-based regulator.
- 4.75** We introduced a field for operators to submit data about GGY derived from in-play betting at the time of the previous review of the RCBB form. Although a voluntary field, our analysis shows that most operators (where relevant to their business model) have provided the data and this has helped inform various pieces of advice since that date.
- 4.76** The size, shape and importance of the in-play market is receiving increasing amounts of attention and is predicted to be one of the key drivers behind remote betting sector growth in future⁸. We therefore think it is vital to understand the evolution of this sector in terms of overall size, as well as the breakdown according to the headline sports. This will help us identify any changing risk profile presented by the growth of in-play.
- 4.77** As a result we propose to mandate the existing (voluntary) question which asks operators to report their in-play GGY. For the purposes of understanding the products used, this will require a product split between 'football' and 'other'.
- 4.78** We propose that the question will remain in line with the previous question within regulatory returns and as such will apply to GGY derived from GB customers only.

Questions

Q31. Do you agree with the Commission's position of mandating the collection of data on in-play GGY for GB customers?

Q32. What are your views on the proposed split categories 'football' and 'other'?

Gambling payment (return to player) faults

- 4.79** One of our three licensing objectives is to ensure gambling is fair and open, and we underpin this with:
- a) regulations
 - i) technical standards

⁸ "European Gaming – a New Era", Barclays Equity Research (November 2015)

- ii) testing requirements
 - iii) licence conditions and codes of practice
 - iv) requirement to report failures/issues
- b) working with industry using information provided by reported failures and complaints by consumers to ensure incidents are handled fairly
- c) sharing any learning from field incidents and finding better ways to prevent and identify problems, amending regulations as necessary.

4.80 Where faults occur that result in under or overpayments to players, regulators have an interest in understanding how and why the issue occurred, the scale and severity of the impact on players and whether the licence-holder will deal with the matter in the most appropriate way in keeping with the fair and open objective.

4.81 As soon as an under or over payment has been confirmed (that is, an investigation into a potential issue has confirmed a fault), the game should be disabled and a notification sent to us with oversight of the affected product, setting out the issue for consideration with as much information about the fault, how it occurred, any failures or weaknesses in testing, its impact (eg number of players and amounts involved) and what actions are being taken or proposed as a result.

4.82 Not every suspected payment fault would be reported to us. However once a fault is confirmed, reporting would be expected. A game under or overpayment issue, even a minor one, represents a failure in design, build, testing or deployment and is therefore likely to be of interest to regulators. While a game paying out a faulty amount that is within a fraction of the advertised rate appears minimal, it indicates something went wrong in the lifecycle of a game which could easily have been larger. An operator who is able to detect minor variances using their monitoring processes would be demonstrating they have very effective processes in place.

4.83 Notification of these events within regulatory returns takes place through the 'Other remote events' section of the form, which is discussed above. We consider a gambling payment return to player (RTP) fault such as this fits best within the key event notification process, given the potential time-delay if we are to continue using the regulatory returns (currently this sits within the data requirements in Appendix of the RCBB return form). We therefore propose removing the requirement entirely from regulatory returns and instead designating it as a key event within eServices.

Question

Q33. Do you agree with the removal of information about a gambling payment RTP fault from the regulatory returns and designating it as a separate key event?

Additional data which is proposed for inclusion (Remote)

eSports

- 4.84** During August 2016 we set out our position on eSports in our [discussion paper](#).
- 4.85** eSports are not new but in recent years their popularity has continued to grow strongly. It is difficult to define eSports but for the purposes of this paper we use the term to describe the playing of computer games which can range from play by two individuals (including 'match-ups') to playing in professional competitions.
- 4.86** Popular eSports include real-time strategy, fighting, first-person shooter, and multiplayer online battle arena. Tournaments such as The International, the League of Legends World Championship, the Battle.net World Championship Series, the Evolution Championship Series, and the Intel Extreme Masters, provide live broadcasts of the competition, and prize money and salaries to competitors. In 2015, eSports were estimated to have an audience of 160 million and total prize funds exceeding \$71 million⁹.
- 4.87** eSports present some particular challenges and risks for gambling regulation. In 2015 a number of established British operators began taking bets on eSports and some specialist operators also entered the market. In terms of overall market share, betting on eSports currently accounts for a very small proportion of the British gambling market, but it is growing.
- 4.88** In our view, the regulation of betting on eSports is no different from any other event upon which bets can be placed. As we see it, betting on eSports presents risks that need to be managed in a similar way to other forms of betting and gaming, including the risk of cheating and match-fixing and the risk that people will gamble excessively. We expect operators offering markets on eSports to manage the risks, including the risk that children and young people may try to bet on such events given the popularity of eSports with children and young people.
- 4.89** There is currently no separate section of the RCBB form for eSports, and to date the Commission has requested data on an ad-hoc basis from certain operators within this market. For these reasons we propose including a question within the regulatory returns to establish the GGY on eSports.

Question

Q34. Do you have any views on the addition of fields for eSports revenues, which will allow a GGY calculation?

Gambling management tools

- 4.90** The current RCBB form includes a section for the collection of data on the volumes of gambling management tools, including some metrics which are unique to remote, which are listed below:
- time-outs, and
 - product-specific restrictions placed by customers.
- 4.91** In addition the LCCP requires relevant operators to adhere to remote technical standards, which allows for customers to be able to proactively set limits in terms of the time and money they spend.

⁹ Global Growth of Esports Report – Newzoo Games Market Research.

4.92 We propose collecting the data on the number of times voluntary time and money limits are set by customers, as this metric will provide a proxy from which we are able to benchmark the uptake by customers of this gambling management tool, as well as assuring operator compliance or informing other social responsibility work which may be required in this area.

Question

Q35. Do you foresee any issues with reporting on the number of times which time/money limits are voluntarily set by active customers?

5 Proposed changes to the types of guidance to help the completion of regulatory returns

- 5.1 The current eServices system has online guidance accessed via clickable question marks. This was designed to provide an interactive guidance to assist operators in making accurate regulatory returns, without crowding out the screen by large amounts of text.

Financial information

Please provide details of your off-course trading information

- 5.2 As a result of the various quality assurance activities which we undertake on regulatory data received, we have identified that in some cases operators are either unaware of the guidance provided by us, or do not believe that they need to look at it. A number of reasons have been given by operators for this:
- an assumption that the data required is 'straightforward' so they have no need to check the guidance
 - they have inherited the responsibilities for regulatory data submission from another colleague, and in doing so have not thought that they needed to check the guidance themselves
 - although the individual may have submitted this data to us on previous occasions (and therefore assume they can remember), for annual returns the amount of time between returns may mean they forget or feel they have no requirement to check the guidance.
- 5.3 We have also received feedback that the format of the guidance (ie click-through accessible through the question mark icon) isn't necessarily suitable for all users, and as a result of this we are proposing to incorporate some potential different forms of guidance for operators to use, with suggestions including:
- Automatic pop-up guidance when certain fields are clicked into,
 - Mandatory guidance for fields in which the highest number of mistakes / potential mistakes are made,
 - Alternative communication channels for guidance such as demonstration videos (for example a link to YouTube) or webinar-style, interactive 'how to' guides.
- 5.4 Our guiding principle for these changes is to make it as seamless and easy as possible for operators to submit accurate regulatory data.

Question

Q36. What are your views on how we can make the regulatory data guidance better for your needs?

6 Future proposed changes to collection and submission of regulatory data

Other considerations

- 6.1** In addition to looking at potential changes to specific data requirements, we have also been considering changes which could minimise the burden on both operators and us in terms of collection and processing of data. This is set against the backdrop of maintaining the best possible evidence base on which to base regulatory decisions, including enabling operators to evidence whether they are putting the consumer at the heart of their business decisions.
- 6.2** Some suggestions for ways in which we may balance those requirements are included in the table immediately below.

Suggestion	Benefits
Single returns per licensed entity	<ul style="list-style-type: none">• Time-saving for operators if returns are combined• Reduction in complexity of returns
Fixed submission dates (eg per sector)	<ul style="list-style-type: none">• Reduction in data skew within reports such as Industry Statistics
Quarterly returns for all large (non-remote) operators	<ul style="list-style-type: none">• More up-to-date information on the largest gambling operators• Level playing field across sectors for largest operators• Removes much of the requirement to 'estimate' parts of Industry Statistics based on time-lag

- 6.3** We would welcome stakeholder views on the suggestions above and/or any other suggestions stakeholders may have. Any such changes would be longer-term and would be subject to a rigorous cost-benefit analysis for both operators and the Commission and to further discussion.

Questions

Q37. What are your views on the possible suggestions outlined above?

Q38. Do you have any other suggestions about structural changes to the regulatory returns process which could benefit stakeholders?

Self-exclusion

- 6.4** Self-exclusion is widely accepted as an important harm minimisation tool for customers who have recognised that they have a problem with their gambling. At present the regulatory returns system asks operators to tell us three pieces of data about self-exclusions:
- a) number of new self-exclusions made during this period
 - b) number of known breaches of self-exclusion, and
 - c) number of self-excluded individuals opting to return to gambling

- 6.5** Previously, if an individual wished to self-exclude entirely from all forms of gambling they needed to do so separately with each operator they gambled or might gamble with. In our 2014 [consultation](#) document, the Commission highlighted concerns, made in the Responsible Gambling Trust's harm minimisation¹⁰ and self-exclusion¹¹ reports, concerning the ease with which self-excluders can continue to gamble at 'other venues, sites, operators, sectors and jurisdictions' undermining, in their view, the effectiveness of self-exclusion as a tool.
- 6.6** Following the 2014 consultation we confirmed changes in a number of areas, one of which was the introduction of a Social Responsibility Code (SR Code) 3.5.6 that requires operators to offer multi-operator self-exclusion allowing customers to exclude themselves from other premises that offer the same type of gambling in their locality. This requirement has resulted in separate schemes covering multi-operator self-exclusions for both remote gambling and a series of sector-specific schemes covering non-remote gambling. These schemes are not currently run (or proposed to be run) by operators directly, instead being undertaken through other industry stakeholders such as NCIF, RGA and Senet.
- 6.7** The current eServices IT architecture only allows licensed operators to log-in and enter data into the system, meaning that at present it is not possible for other industry stakeholders (such as those listed above who are or will facilitate the multi-operator self-exclusion schemes) to do this. This presents a potential problem for the Commission in terms of data collection from the multi-operator self-exclusion schemes.
- 6.8** Collection and analysis of data in relation to the multi-operator self-exclusion schemes are vital in terms of monitoring their performance and providing an insight into their success and any emerging relationship with the (current) operator specific schemes. As customers have a choice about whether to self-exclude from an individual operator or to participate in one of the multi-operator self-exclusion schemes, we feel it is important to continue to collect the current self-exclusion data from operators, as well as the new data from the multi-operator schemes.
- 6.9** As a solution, we propose to develop the eServices system to accommodate login and data entry facilities for non-operator stakeholders who deliver one of the multi-operator self-exclusion schemes. It is envisaged that we will require them to enter data on a regular basis using the same three metrics as outlined above, which equate to the count of the following specifically about the multi-operator self-exclusion scheme on a regular basis:
- a) number of new self-exclusions made during this period
 - b) number of known breaches of self-exclusion, and
 - c) number of self-excluded individuals opting to return to gambling.

Questions

Q39. Do you have a view on the proposal to develop eServices to allow login and data entry for (relevant) stakeholders who are not operators to capture this data?

Q40. Do you have a view on the specific questions asked?

¹⁰ Blaszczyński, Parke, Parke and Rigby (2014) Operator-based approaches to harm minimisation in gambling: summary review and future directions (Report prepared for the Responsible Gambling Trust).

¹¹ RGT report on self-exclusion.

7 How to respond to this consultation

- 7.1** We welcome comments on these proposals from all stakeholders who may be interested. This consultation document is available at the Gambling Commission website (www.gamblingcommission.gov.uk).
- 7.2** The closing date for responses to this consultation is Friday 13 January 2017.
- 7.3** Please send your comments by e-mail to: consultation@gamblingcommission.gov.uk or to:
Consultation Coordinator
Gambling Commission
Victoria Square House
Birmingham
B2 4BP
- 7.4** When responding, please state whether you are doing so as an individual or representing the views of an organisation. If you are responding on behalf of an organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled. We will acknowledge your response.
- 7.5** All information in responses, including personal information, may be subject to publication or disclosure under Freedom of Information legislation. Although we will endeavour to respect any request made by a respondent which is said to be made in confidence, this may not always be possible. Any such request should explain why confidentiality is necessary. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.
- 7.6** This consultation is being conducted in line with the Cabinet Office consultation principles published in January 2016. The criteria are listed on www.gov.uk and the Commission's website, together with details of who to contact with any comments on the consultation procedure or complaints about the way it is being conducted.

8 Summary of consultation questions

8.1 The following table recaps the consultation questions as set out (in order) from within this document.

Questions

- Q1. Do you agree with our proposal to combine the columns into a single submission for each category, in order to avoid double-counting? This would require collecting more granular detail only on an as-required basis and would be done through a bespoke (and targeted) data collection process with relevant operators.
- Q2. Do you foresee any problems in splitting out GGY according to the category of play?
- Q3. Do you agree with the proposal to remove the requirement to provide “*People who having entered the premises were unable to verify their age*” from the relevant non-remote forms?
- Q4. Which of the two options outlined in paragraph 2.26 do you think would provide the best and most useable data to provide the Commission with an in-depth understanding of the risks in this area?
- Q5. Do you have any alternative approaches which would provide the Commission with the levels of granularity, accuracy and qualitative data which we need?
- Q6. What are the most useful metrics available to operators in terms of the number of times police are called to gambling premises? For example the number of violent incidents or the number of times machines are damaged by customer actions.
- Q7. Do you agree with the removal of the SAR question from the regulatory returns system, thus reducing duplication?
- Q8. Do you foresee any issues with the change of a key event notification regarding the submission of a SAR (including appropriate consent) to include information on whether a customer relationship has been discontinued?
- Q9. Do you agree with the change to require (where relevant) turnover and GGY details on the RCBB form?
- Q10. Do we have the correct mix of sports for betting on both the RCBB and the non-remote betting form (including ‘Other’)?
- Q11. Should we ensure the same sports are represented on both the RCBB form and the non-remote betting form?
- Q12. Do you agree with the changes to harmonise the casino section of the RCBB form with the relevant products used on the non-remote form?
- Q13. Do you agree with the inclusion of a question to include details of GGY attributable to prize gaming?
- Q14. Do you agree with our proposal to remove the seasonal employee question from the AGC and FEC forms?
- Q15. Do you agree with our proposal to add a revenue field to capture revenue from maintenance and the sale of kits?

- Q16. Do you agree with our proposal to include an additional question on the form to report the split of revenue between remote and non-remote means rather than introducing a separate form for each licence?
- Q17. Do you foresee any problems reporting the maximum prize alongside other data, or type of product which is already submitted?
- Q18. Have we missed any important products from the list for society lotteries (ie those which will form the check-boxes)?
- Q19. Do you agree with the removal of the following questions as the data is replicated elsewhere –
- the total remote ticket sales/proceeds (£)
 - total number of remote lotteries managed
- Q20. Do you agree with our proposed list of product categories, or do you have any others which should be considered?
- Q21. Do you agree with the proposal to split out revenues derived from EBTs?
- Q22. Do you agree with the proposed inclusion of separate questions for SSBT numbers and GGY?
- Q23. Do you agree with the list of sports outlined for collection within this section?
- Q24. Do you foresee any issues with reporting on the number of times which time / money limits are voluntarily set by customers?
- Q25. Do you agree with the proposal to remove 'Number of slips' from the non-remote betting regulatory returns form?
- Q26. Subject to the outcome of the phased trail process, do you agree with the removal of the customer funds question from regulatory returns?
- Q27. Do you agree that trading names and domain names reporting sits best within key events and as a result should be removed from regulatory returns?
- Q28. Do you have any objections to our proposal to remove the voluntary question about customer demographics?
- Q29. Do you agree with the Commission's proposal to remove the "remote events" section from the relevant regulatory return forms?
- Q30. What are your views on our preferred option for the provision of group jurisdictional revenue information to the Commission, and why?
- Q31. Do you agree with the Commission's position of mandating the collection of data on in-play GGY for GB customers?
- Q32. What are your views on the proposed split categories 'football' and 'other'?
- Q33. Do you agree with the removal of information about a gambling payment RTP fault from the regulatory returns and designating it as a separate key event?
- Q34. Do you have any views on the addition of fields for eSports revenues, which will allow a GGY calculation?

- Q35. Do you foresee any issues with reporting on the number of times which time/money limits are voluntarily set by active customers?
- Q36. What are your views on how we can make the regulatory data guidance better for your needs?
- Q37. What are your views on the possible suggestions outlined above?
- Q38. Do you have any other suggestions about structural changes to the regulatory returns process which could benefit stakeholders?
- Q39. Do you have a view on the proposal to develop eServices to allow login and data entry for (relevant) stakeholders who are not operators to capture this data?
- Q40. Do you have a view on the specific questions asked?

Gambling Commission November 2016

Keeping gambling fair and safe for all

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