

# One year on: progress delivering the National Responsible Gambling Strategy

**June 2017** 

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#### **Foreword**

We are now one year on from the publication in April 2016 of the National Responsible Gambling Strategy. This report is our assessment of collective progress over the first twelve months. It has been delayed slightly by the purdah restrictions associated with the General Election.

We believe the objectives of the Strategy, and the priority actions designed to achieve them, remain as relevant today as they were when they were agreed.

The overall impact is difficult to assess after only one year. There has been a good deal of activity and a general sense of moving forward. There have also been some disappointments. We need to be realistic about what can be achieved over a relatively short period. But there is still much to do if the Strategy is to make visible progress towards its objectives. We need to increase the pace of delivery over the next 12 months.

A strength of the Strategy is that it was produced in collaboration with a range of different stakeholders, increasing the extent to which it is collectively owned. This progress report is the result of widespread consultation. The Responsible Gambling Strategy Board is grateful to all those who contributed their views and details of the work they have undertaken. The judgements are our own.

Childre read

Christopher Kelly Chair, Responsible Gambling Strategy Board

#### I. Introduction

- In April 2016, the Responsible Gambling Strategy Board published a National Responsible Gambling Strategy for 2016-17 to 2018-19<sup>1</sup> with the aim of reducing or mitigating gambling-related harm. The publication of the Strategy followed a period of public consultation.
- 2. The Strategy was constructed around 12 priority actions which, with collective ownership and delivery, were intended to deliver five priority objectives:
  - I. develop more effective harm minimisation interventions, in particular through further experimentation and piloting of different approaches
  - II. improve treatment through better use of knowledge, data and evaluation
  - III. build a culture where new initiatives are routinely evaluated and findings put into practice
  - IV. encourage a wider range of organisations in the public and private sectors to accept their responsibility to tackle gambling-related harm; and
  - V. move towards a better understanding of gambling-related harm and its measurement.
- 3. We undertook to publish annual reviews of progress, to check that the priorities in the Strategy were still appropriate, to ensure that delivery remained on track and to make any necessary adjustments in the light of experience or other developments.
- 4. This is the first of our progress reports.<sup>2</sup>

#### Developments since the Strategy was published

- 5. There have been a number of developments relevant to the Strategy in the period since it was published.
- 6. In particular:
  - i. In June 2016, GambleAware (formerly the Responsible Gambling Trust) appointed a new independent chair. It has subsequently increased the proportion of trustees on its board without an industry background. Such independent trustees are now in a clear majority (eight out of 13).
  - ii. In October 2016, the Department for Culture, Media and Sport (DCMS) published a call for evidence for its Review of Gaming Machines and Social Responsibility Measures.<sup>3</sup> A consultation paper is expected shortly. The outcome of the review may have significant implications for some aspects of the Strategy.
  - iii. In December 2016, GambleAware published a five-year strategy to 2021.<sup>4</sup> The GambleAware strategy contains commitments to triple the number of people receiving treatment, double GambleAware's investment in prevention and increase its research budget by 50 per cent.
  - iv. In January 2016, we published an initial assessment of the funding required to deliver the research, education and treatment elements of the National Strategy delivered by GambleAware. Our conclusion was that, on the information then available, GambleAware was likely to be adequately funded for delivering the initial stages of the Strategy, provided it met its funding targets.

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<sup>&</sup>lt;sup>1</sup> The National Responsible Gambling Strategy 2016-17 to 2018-19, Responsible Gambling Strategy Board, April 2016

<sup>&</sup>lt;sup>2</sup> This report was prepared by April 2017, but its publication was delayed due to the purdah period leading up to the General Election in June 2017.

<sup>&</sup>lt;sup>3</sup> Call for evidence: Review of Gaming Machines and Social Responsibility Measures, DCMS, October 2016

<sup>&</sup>lt;sup>4</sup> GambleAware Strategy 2016 – 2021, GambleAware, November 2016

However, we noted that the industry as a whole does not yet meet GambleAware's fundraising target of 0.1 per cent of gross gambling yield. We also recognised that as more is understood about what works, and if GambleAware is successful in its objective to increase the number of those treated, additional funding is likely to be required.

v. In January 2017, we submitted to the Gambling Commission our advice on maximum stakes and prizes on B2 and other gaming machines, an issue which we had undertaken at the time of the Strategy to address subsequently and in detail. We understand that the Commission will be publishing that advice shortly.

#### Current estimates of gambling participation and problem gambling

- 7. The most recent estimate suggests that the number of problem gamblers in England, Scotland and Wales (as defined by the most widely used screening tools), is around 300,000. There are a further 540,000 individuals classified as being at moderate risk of problem gambling according to the screens. These numbers are produced by combining 2016 data relating to Wales with earlier (2012 and 2015) data from English and Scottish Health Surveys. They do not therefore have any light to shed on the impact of a Strategy which began in 2016.
- 8. We do know, however, that overall participation in gambling increased in 2016 relative to the previous year. The Gambling Commission's report<sup>5</sup> on gambling behaviour in Great Britain in 2016 estimated that 48 per cent of people aged 16 and over had participated in at least one form of gambling in the past four weeks (a three per cent increase on 2015).
- 9. The report also indicated a hardening of attitudes to gambling. 67 per cent of people in Great Britain agree that people should have the right to gamble whenever they want. But only 34 per cent currently think that gambling is fair and can be trusted. 78 per cent agreed that there are too many opportunities for gambling, and 69 per cent agreed that gambling is dangerous for family life. Gambling operators would do well to consider the implications for the long-term sustainability of their industry. Shifting attitudes might be thought to increase the importance to them of delivering real gains from this Strategy.

#### **Production of this report**

10. After the Strategy was published we held a series of meetings with industry trade associations to discuss their plans to help deliver its commitments. We then held a meeting in the summer with the Industry Group for Responsible Gambling to agree how we could collectively review and report on delivery. In November and February we used two meetings of our Advisory Group, which includes other stakeholders as well as gambling industry representatives, to exchange views about what was happening and to consider any possible gaps. We also invited written evidence from industry trade associations, larger operators and other stakeholders about the actions they had been taking. This report was shared with our Advisory Group in draft. The judgements in it, however, remain our own.

#### Structure of this report

11. The remainder of this report is structured as follows:

Part II presents a summary review of progress

Part III provides greater detail about progress on each of the priority actions and identifies areas of focus for the next period

Part IV contains some brief conclusions

**Annex A** details many of the research projects, industry initiatives and other actions that have been delivered during the first year of the Strategy.

<sup>&</sup>lt;sup>5</sup> Gambling participation in 2016: behaviour, awareness and attitudes, Gambling Commission, February 2017

#### II. Summary review of progress

- 12. There has been considerable activity during the first year of the Strategy, some elements of which have been more successful than others. We recognise and welcome what has been achieved.
- 13. Ideally, we would be measuring progress by assessing the impact on the amount of gambling-related harm. Unfortunately, as is well known, the data do not as yet exist to allow that to happen. Instead, the table below provides a brief summary of our view of progress in the delivery of each of the priority actions in the Strategy. The following section, on page 14, gives greater detail and suggests the main areas of focus for the next 12 months.
- 14. We have judged each priority on a red, amber or green scale, based on our assessment of the evidence. The ratings reflect our overall level of concern taking into account:
  - i. progress against delivering the priority action as set out in the Strategy
  - ii. overall achievements; and
  - iii. level of risk to the delivery of the priority action by the end of the Strategy period.
- 15. It will be apparent that most ratings are red or amber. That may, in part, be inevitable when we are still only one year into a three-year Strategy. It may also reflect the fact that some of the initiatives described are at a more mature stage of development than others, some of which were starting from a low base. That said, if the Strategy is to be effective it will be important to find ways to accelerate the pace of delivery over the remaining two years and, in particular, to find ways of addressing those areas where progress has been more disappointing.
- 16. We should not be complacent about any of the priority actions. Our assessment is at a point in time. Ratings are unlikely to remain static. They could move in either direction over the next year.

Assessment of progress to date			
Priority action	Indicators of success	Current Level of concern	Summary assessment
PA1: Understanding and measuring harm	A better, shared understanding of what is meant by gambling-related harm. A range of indicators that will assist in its measurement and monitoring. Greater insights into the factors that can cause transition from non-harmful to harmful play.	Red	Planned research has yet to be published following a peer review. This is a particularly important strand of work if we are to get to a position to understand whether efforts to reduce harm are working. The first phase of research will still only move us a small way towards the ambitious target we have set. There are significant challenges to overcome if any useful findings are to be implemented by the end of the Strategy period.
PA2: Engagement with relevant public sector bodies	Demonstrable engagement by a wider range of public bodies, evidenced both by the commitment of resources, action to help reduce gambling-related harm and by the adoption of appropriate policies.	Red	There are some signs of interest from a number of public health bodies. It is too early to assess if this initial interest will lead to any significant engagement and a commitment to change policy. A red rating is necessary until we have seen firmer commitments to partnership work on gambling-related harm.
PA3: Consolidating a culture of evaluation	Every significant new intervention to be routinely and independently evaluated in line with the Evaluation Protocol. Evaluations published or shared between operators, so that learning is disseminated. High levels of take up of training and support materials.	Red	A lot of activity is said to be taking place and some evaluations have been published. We have not, however, yet seen sufficient evidence of evaluations of player protection interventions being widely carried out. We are also concerned that, where evaluations are taking place, there is insufficient focus on impact as opposed to process. Without evidence of what does, or does not, work, it will prove difficult to demonstrate that progress is really being made to reduce gambling-related harm.
PA4: Increased understanding of the effects of product characteristics and environment	Increased understanding of the relevance of different environments and product characteristics and the impact they have on gambling-related harm.	Amber	Some useful research has been completed. Plans are in place to build on this through our research programme. However, achieving an evidence-based understanding of the link between harm and different gambling product characteristics and environments remains a significant challenge. A large amount of work is still required.

Assessment of progress to date			
Priority action	Indicators of success	Current Level of concern	Summary assessment
PA5: Improving methods of identifying harmful play	Well-established methods across the industry so that operators are able to identify which of their customers are most likely to be suffering harm.	Amber	A lot of welcome activity is taking place in both land-based and online parts of the industry. More progress is required in terms of demonstrating the effectiveness of these approaches, improving their transparency and ensuring that proven good practice is adopted across the industry.
PA6: Piloting interventions	Operators, often working in collaboration with each other, designing and implementing pilot projects to test interventions to reduce harmful gambling. This should be across a wide range of different types of support and interventions, taking place in all sectors of the industry, and accompanied by evaluation and development to put learning from trials into practice. Results should be shared at conferences and in other ways.	Red	There is some innovative practice developing in a number of operators. But there is still limited evidence of its effectiveness. We are yet to see the wide scale development, testing, implementation and evaluation of interventions to reduce harmful gambling for which we had hoped.
PA7: Self-exclusion	Schemes in place and followed by evaluations designed to improve their effectiveness and assess the extent they are effective at reducing gambling-related harm. Improvements in levels of awareness amongst gamblers of the possibility of self-exclusion as a tool to manage their gambling.	Green /Amber	Implementation of multi-operator schemes is so far going well. All but one of the planned multi-operator self-exclusion schemes are now established. Player awareness of them is improving, albeit from a relatively low base. But it will take longer for the impact of the schemes to be understood. They have yet to demonstrate their effectiveness as a harm minimisation tool. Evaluation to understand the impact of these schemes is essential.
PA8: Education to prevent gambling-related harm	Completion of a systematic review of the role of education and decisions taken about how best to follow up its conclusions, and scale-up activities that are proven to have a realistic prospect of being successful in reducing harm.	Amber	A number of research projects and harm minimisation pilots are taking place, which should improve understanding of what works and what kinds of interventions might be counterproductive. But we do not yet have a clear idea of whether preventative education is likely to be effective in

Assessment of progress to date			
Priority action	Indicators of success	Current Level of concern	Summary assessment
			reducing gambling-related harm, nor of the best ways of delivering it to those who need it most.
PA9: Building the quality and capacity of treatment	The creation of a body of evidence about the quality and effectiveness of different treatment options. More will be known about the steps that can be taken to encourage people to seek support through treatment and prevent them from dropping out. The Data Reporting Framework will be fully embedded in funded treatment provision and independent analysis will be published regularly. The learning from these activities will inform future commissioning decisions.	Amber	Borderline red. Services are in place to provide treatment in a variety of ways from brief interventions through weekly therapy to intensive residential care. But there are issues about the mix of services, the effectiveness of different services and the relatively small number of problem gamblers receiving treatment. GambleAware has taken significant new steps in relation to commissioning. The new approach has, however, yet to prove itself and will take time to embed. We look forward to more evidence over time of the effectiveness of the treatment system as new pathways are developed and implemented.
PA10: Widening and strengthening the research field and improving knowledge exchange	A wider range of researchers tendering for gambling-related research. Fewer expressions of unwillingness to do so because of concern about the source of funding. Researchers will have access to a broader range of funding streams and expertise from other sectors and fields of research.  They will be assisted by greater availability and sharing of data and results will be disseminated widely and transparently. There will be a greater degree of public confidence in the quality and independence of gambling-related research, and	Amber	We have taken steps to improve the research commissioning process, including the publication of an independent research programme and a commitment that research questions will be set by RGSB. There are some signs of a widening of interest in gambling-related research. But we have yet to see whether making the accountabilities and other aspects of the commissioning process more transparent will succeed in reducing misapprehensions about the independence of GambleAware-commissioned research.

Assessment of progress to date			
Priority action	Indicators of success	Current Level of concern	Summary assessment
	a reduction in criticism of the way research funds are allocated and research questions set.		
PA11: Horizon scanning	Horizon scanning will involve a range of different techniques to gather information, including media scanning, data analysis and insights from industry stakeholders. Such analysis will be disseminated so that a wide range of partners can benefit from any insights.	Amber	The Gambling Commission is taking steps to improve horizon scanning through their plans to publish a Risk Outlook in their 2017-18 business plan. There needs to be a greater focus by operators and others on identifying future risks linked to products they are developing.
PA12: Public engagement	Gamblers, whether experiencing harm or not, should be consulted during the planning of interventions at a point when their insights and experiences can influence those plans.	Amber	The Gambling Commission, GambleAware and some operators are now incorporating the views of gambling consumers in the development of their initiatives. There is undoubtedly more that could be done across the industry to ensure that better use is made of the insights of problem gamblers, other players, and their families.

- 17. We regard all 12 priority actions as important to the Strategy. It follows that all 12 should continue to be progressed with energy and commitment.
- 18. There are, however, four areas where we have particular concerns:
  - i. The search to find better ways of identifying and measuring gambling-related harm is of fundamental importance. The preliminary work has not yet improved understanding as much as we would have hoped. Even if it had, there would still be significant challenges to delivering on this priority action by the end of the Strategy period. We do not underestimate the difficulties of delivering useful results before the end of the Strategy period.
  - ii. We remain as yet unconvinced that the wide range of organisations in the public and private sectors with a responsibility for public health are ready to accept their responsibility to help address gambling-related harm, and use their expertise and resources to develop policy responses or fund treatment services. We hope that the second year of the Strategy will lead to more tangible results, that will build on the signs of interest that have emerged during the past year.
  - iii. Impact, as opposed to process, evaluations of new initiatives are not taking place as frequently as we would want. In addition, only a small number of the larger evaluations have been published; and we are not yet seeing the culture change or sharing and learning from each other's practice for which we had hoped. Without evidence of what does, or does not, work it will be difficult to prioritise efforts to minimise gambling-related harm.
  - iv. We are encouraged by what operators have told us about the initiatives and interventions they are designing and piloting to detect and mitigate harmful play. However, we believe that more of this activity is needed if the industry is to demonstrate that it is genuinely seeking to minimise harm. Except in the case of the industry-led information to players projects, where pilots are taking place, there is little evidence of the learning being shared across the industry. That may have been largely inevitable at this stage of the Strategy. But broader sector and industry-wide initiatives will be needed to create the desired impact on minimising gambling-related harm by the end of the Strategy period.

#### III. Detailed assessment of progress

### Priority action 1: Understanding and measuring harm <a href="Progress: Red">Progress: Red</a>

19. In July 2016, GambleAware commissioned PwC to undertake the first phase of a three-strand research programme. The first part is an exploration of the different kinds of harm gamblers and others experience and how this can be used to establish a framework, which would allow the development of systematic and comprehensive measurement indicators.

- 20. The report will be published shortly. It does not look as if it will have progressed thinking as far as we had hoped. The second strand, which is yet to be commissioned, provides an opportunity to address this shortfall. It will identify specific indicators and how the relevant data can be collected so that the impact of attempts to minimise gambling-related harm might be more accurately evaluated.
- 21. GambleAware has published a report by the Institute for Public Policy Research (IPPR) on the cost of gambling-related harm to government. This captures only the fiscal impact, and does not cover more personal or social costs. But it is a useful contribution to the debate.

#### Focus in year two

Commissioning the second phase of the research to measure gambling-related harm is a critical next step. The work is likely to face considerable challenges, not least the attribution of identified harm to gambling rather than other factors and persuading other agencies to collect new data or share what they have already.

## Priority action 2: Engagement with relevant public sector bodies and other agencies to encourage greater sharing of responsibility for delivering the strategy

**Progress: Red** 

- 22. Previous attempts to encourage relevant agencies such as the Department of Health and Public Health England to recognise the role they can play in identifying and reducing gambling-related harm have been largely unsuccessful. In recent months we and GambleAware have, with the support of the Gambling Commission, encountered some limited but encouraging signs of greater willingness to engage. It is, however, too early to tell if this interest will lead to significant changes in policy or a commitment of resources.
- 23. To support this priority, in December 2016 we published a position paper on gambling-related harm as a public health issue. GambleAware has also published the IPPR report on the cost of problem gambling. This report, although limited by the available data, estimates that problem gamblers directly cost the public purse between £260 million and £1.2 billion a year, with the highest costs being associated with health, welfare and employment, housing and criminal justice. The report also acknowledges that there is an urgent need for central and local government, service providers, academics and others to come together to fill the gaps in the existing evidence base.

#### Focus in year two

The Responsible Gambling Strategy Board and GambleAware will continue to work with the Gambling Commission on engaging with other public health bodies to raise the profile of gambling-related harm.

The objective is to gain their acceptance of gambling-related harm as a public health issue which should be recognised in their strategies and reflected in their spending decisions, their staff training, their collection of data (for example in screening clients) and the information and signposting they provide. It is hoped that the IPPR research and information becoming available as the result of Priority Action 1 will help in making the case.

#### Priority action 3: Consolidating a culture of evaluation Progress: Red

- 24. A number of practical steps have been taken to support the industry with evaluation. We published an Evaluation Protocol<sup>6</sup> in April 2016. GambleAware has delivered evaluation training to operators, published a range of evaluation support materials on their enhanced online information system (InfoHub) and appointed a panel of suppliers who can support the industry with evaluation expertise. The Gambling Commission continues to stress the importance of appropriate impact evaluation of harm reduction initiatives. It is also developing an evaluation framework for the multi-operator self-exclusion schemes, and using its Annual Assurance Statement process as a mechanism for encouraging and sharing good practice. Trade associations are similarly encouraging their members, and are endeavouring to evaluate their own initiatives.
- 25. These activities are bearing some fruit with larger initiatives more likely to be evaluated than before. We also recognise that we are only one year on from the publication of the Strategy. However, our impression is that there has not yet been the culture change for which we had hoped. Where evaluation has taken place it is often only focused on process and not considering the impact an intervention is having on reducing harm. It is important that the industry accepts responsibility for understanding the impact of interventions if they are to be seen as credible in their intention to lead on the reduction of gambling-related harm.
- 26. There is also still some uncertainty about how different interventions can most appropriately and proportionately be evaluated. Evaluation need not always be an expensive nor academic activity.
- 27. We are also concerned that there is, as yet, relatively little evidence of evaluations being published or otherwise being made available so that learning about success and failures can be shared.
- 28. Some of these issues may partly be a question of the timing of when initiatives were started. We hope they do not imply a more fundamental weakness.

#### Focus in year two

Operators and their trade associations, with support from GambleAware, the Gambling Commission and the Responsible Gambling Strategy Board, will need to continue to evaluate new initiatives, focusing on impact (both intended and unintended) as well as process. Proportionate and appropriate impact evaluation needs to be embedded in the design of any new initiatives and products, whoever undertakes them.

<sup>&</sup>lt;sup>6</sup> Evaluation Protocol, Responsible Gambling Strategy Board, April 2016

GambleAware will explore the possibility of a central portal where industry evaluations (either partial or full) can be uploaded and shared with others so that appropriate lessons can be learnt.

### Priority action 4: Increased understanding of the effects of product characteristics and environment

**Progress: Amber** 

- 29. In the past year, GambleAware has commissioned and published a number of research reports providing descriptive accounts of how people gamble in different environments, including Ipsos MORI research into problem gambling behaviours in bingo premises. GambleAware also commissioned a report on product-based harm-minimisation which considers possible mechanisms for harm prevention and minimisation by modifying the structural characteristics of gambling products. The licensed betting office (LBO), adult gaming centre (AGC) and bingo sectors have made data available about patterns of play on B2 and B3 gaming machines in different gambling venues. The Gambling Commission's recent consultation on remote gambling and software technical standards also highlighted the extent to which new and emerging game design may encourage excessive gambling behaviour as an area it wishes to explore further.
- 30. All of this has been useful. But we still need to know more about how and why people play particular products, what this means for harm, how play varies by location, what motivates gamblers to gamble in particular environments, and what triggers players to move in and out of harmful periods of play.

#### Focus in year two

We have published a research programme which sets out what needs to be done to gather evidence relevant to this and other priorities. That programme will be implemented over the next two years. In line with Priority Action 10, it will be important that as wide as possible a range of researchers from different disciplines become involved, so that the best possible understanding of the issues can be achieved.

### Priority action 5: Improving methods of identifying harmful play Progress: Amber

- 31. We have been encouraged by the volume of activity by major operators in relation to methods of identifying harmful play, including the development of algorithms to identify behavioural markers which may indicate a potential concern, the monitoring of patterns of deposits and spend over specified timeframes, and reviews of customer conversations.
- 32. The National Casino Forum (NCF) is working with Focal Research and five major casino operators to identify harmful machine play in their sector. GambleAware has commissioned PwC and the Responsible Gambling Council of Canada to undertake research to inform practical applications of harm minimisation for remote gambling operators. The first two phases of the research into markers of harm in the remote sector have been published and the focus of phase three is being scoped.
- 33. A number of operators have also updated their induction and staff training programmes and some are employing the services of external providers such as GamCare to provide training and certification on player protection and social responsibility. The Association of British Bookmakers (ABB) is convening a staff training sub-group to coordinate an industry-wide staff training standard.

- 34. An evaluation of the ABB Player Awareness System (PAS) in licenced betting offices has been published. The evaluation has led to a commitment from members of the ABB to agree a minimum set of industry-wide standards for PAS. The ABB is also trialling two in-session markers of harm for non-account based players in three geographical areas, which it is hoped will complement the development of PAS and identify all players at risk of harm, rather than just those using account-based play.
- 35. Important though these initiatives undoubtedly are, they have, for the most part, yet to be translated into measureable improvements in the identification and prevention of harmful play. It is important that good intentions are translated into good practice, and systematised across the industry.

#### Focus in year two

The industry will need to continue to experiment with methods of identifying potentially harmful play and to evaluate and share their findings so that industry-wide protocols and good practice guidance can be developed. Understanding and identifying harm for different vulnerable groups (eg young people) should also be a focus.

The industry trade associations will need to take forward the findings from relevant research projects, including the tracked play research in casinos, the findings from the Player Awareness System evaluation in licenced betting offices, and markers of harm in the remote sector.

#### **Priority action 6: Piloting interventions**

**Progress: Red** 

- 36. The main areas of progress in piloting interventions over the past year have been in relation to messaging, customer interaction and debit card blocking. The GambleAware-funded information to player's projects being delivered by the Industry Group for Responsible Gambling and the Senet Group<sup>7</sup>, with support from the Gambling Commission and Responsible Gambling Strategy Board, are nearing the end of their first phases and beginning to produce some interesting findings, which will be taken forward in a second phase. In addition, Senet members have newly committed to daily or twice-daily responsible gambling messages using social media, and some operators have been experimenting with, for example, escalating alerts, mobile applications and real-time messaging.
- 37. With the possible exception of the messaging projects, however, we have yet to see the wide-scale development, testing, implementation and evaluation and sharing of interventions to reduce harmful gambling which we believe to be necessary. It is too early to assess the effectiveness of those measures which are being tried, particularly where robust impact evaluation has not yet been undertaken.

#### Focus in year two

GambleAware working with the Industry Group for Responsible Gambling, Senet Group, Gambling Commission and Responsible Gambling Strategy Board, will need to continue their work on messaging, ensuring that the findings are evaluated and turned into practical action across the industry.

Operators and trade associations will need to put even greater energy into developing, testing and evaluating different forms of intervention, being innovative and agile in their experimentation, following up any insights from commissioned research and drawing on ideas from consumers in line with Priority Action 12.

<sup>&</sup>lt;sup>7</sup> An independent body set up to promote responsible gambling standards and ensure that the marketing of gambling is socially responsible.

If sufficient experimentation does not happen through industry leadership, as we hope it will, we will work with the Gambling Commission to specify some of the areas it would be helpful to explore through pilot projects.

#### **Priority action 7: Self-exclusion**

**Progress: Green/Amber** 

- 38. Implementation of these schemes is generally progressing well, but it will take longer for us to understand what impact they are having.
- 39. Multi-Operator Self-Exclusion Schemes for the arcade, betting, bingo and casino sectors are now all in place. Customers need make only a single request to be excluded from multiple operators within the same sector. The Remote Gambling Association is working towards implementing a similar scheme for their sector by the end of 2017. A number of operators have also revised their policies for players returning from self-exclusion to ensure these players are given additional support to manage their gambling responsibly.
- 40. The recent evaluation of the multi-operator self-exclusion scheme for licensed betting offices<sup>8</sup> found that 83 per cent of users found it to be effective in reducing or stopping their gambling activity. The Gambling Commission is developing a framework to ensure that impact evaluations of the remaining schemes commissioned by the industry are consistent and comprehensive.
- 41. The Gambling Commission's latest report<sup>9</sup> on gambling participation found that 6 per cent of gamblers have self-excluded, and a further 37 per cent of gamblers are aware of self-exclusion as a player protection measure, compared with 29 per cent in 2015. Overall awareness is therefore moving in the right direction. It is, however, still lower than desirable. It will be important over the coming months that the availability of self-exclusion continues to be promoted to those who might need to use it, and that operators consider what more they can do to increase the take up of other responsible gambling tools by those that would benefit from them.

#### Focus in year two

The Remote Gambling Association is continuing to develop a multi-operator self-exclusion scheme for the remote sector and plans to have it in place by the end of the year. The implementation of a fully operational scheme involving over 200 operators is likely to prove challenging.

The trade associations for the land-based schemes should use the Gambling Commission's evaluation framework to explore the impact of multi-operator self-exclusion schemes and the extent to which they are effective at reducing gambling-related harm. It will be important that these evaluations include a good sample of customers who have been registered and subsequently completed their participation on the schemes so their perspectives can be captured.

Efforts should continue to promote awareness of self-exclusion schemes and take-up of other responsible gambling tools.

<sup>&</sup>lt;sup>8</sup> Evaluation of the Multi-Operator Self-Exclusion Scheme (MOSES), GambleAware, March 2017

<sup>&</sup>lt;sup>9</sup> Gambling participation in 2016: behaviours, awareness and attitudes, Gambling Commission, February 2017

#### Priority action 8: Education to prevent gambling-related harm

**Progress: Amber** 

- GambleAware published an updated literature review of children and young people's 42. gambling in April 2016.<sup>10</sup> It is also sponsoring a number of harm minimisation projects focusing on education and on target groups that could be considered to be particularly vulnerable, such as young people, military personnel and people in prison. Work led by Senet and the National Casino Forum is focusing on educating young gamblers and customers with mental health difficulties respectively.
- The objective is to use the learning from these schemes to help put in place a coherent national approach to preventative education which guards against the risk of unintended consequences and, as far as possible, targets those groups for whom educational messages are likely to be most effective. As in some other areas covered by the Strategy, it is still too early to assess the extent to which any of this work will produce useful outcomes in terms of harm reduction. We have concerns about the ability to scale-up some of the smaller projects in the future and the limited engagement with the government departments responsible for education. We know that evidence of the effectiveness of preventative education in other areas is mixed.

#### Focus in year two

GambleAware should develop its plans, setting out how it will move from relatively small scale pilots towards a more coherent strategy for preventive education, if the evolving evidence suggests this would be effective.

The Industry Group for Responsible Gambling is planning a cross-industry responsible gambling week later in the year that will build on the first cross-sector 'Responsible Gambling Day' in 2009 and the more recent Association of British Bookmakers Gamble Aware Weeks in 2015 and 2016.

#### Priority action 9: Building the quality and capacity of treatment **Progress: Amber**

- GambleAware has recently undertaken a significant recommissioning process for the 44. treatment services it funds to create a more structured treatment system with defined pathways and tiered levels of care to ensure that the services delivered are meeting the needs of problem gamblers more effectively. Some aspects are still to be completed. New three-year funding agreements are, however, now in place for residential-based services in the West Midlands and South London.
- GambleAware is also in the process of developing a common screening tool for use by all treatment providers so that people seeking treatment for their gambling can be referred to the appropriate service based on the severity of their gambling problem. It is also piloting and testing new approaches to inform the development of this integrated referral pathway. Treatment providers are now reporting data consistently through the Data Reporting Framework (DRF) which should enable aggregate data on the nature and outcomes of treatment to be collated and published annually. 11 Efforts have also been made by a number of operators and trade associations to improve signposting to treatment.
- We are yet to see wider engagement in, or funding for, gambling treatment services. We look forward to seeing evidence on the effectiveness of the new treatment system as the commissioning process is completed and the pathways are embedded.

Children and young people's gambling: Research review, GambleAware, April 2016
 Statistics for Gambling Treatment in Great Britain 2015-2016 from the Data Reporting Framework, GambleAware, December

#### Focus in year two

Over the next year, GambleAware will complete its commissioning process, finalise and implement its common screening tool for treatment providers and continue to embed and analyse the Data Reporting Framework. GambleAware should also develop and publish its evidence base on whether the right mix of treatment services is being delivered. Evidence on the efficacy and quality of different treatment approaches is also needed, as is an understanding of why more people are not accessing treatment, and why people drop out of treatment.

### Priority action 10: Widening and strengthening the research field and improving knowledge exchange

**Progress: Amber** 

- 47. The relative narrowness of the range of researchers interested in the area of gambling has long been a concern. A number of steps have been taken to try to address it. Developments in the last 12 months have included the launch by GambleAware of an innovative applied research grants programme. The programme attracted bids from nine organisations (seven academic institutions and two research organisations), who had not previously engaged with GambleAware. Overall the total number of research contracts awarded by GambleAware has also increased from 12 contracts in 2015-16 to 23 in 2016-17. GambleAware has also redesigned its InfoHub as a much-improved online resource to improve knowledge exchange; and we were encouraged by the number of researchers attending the GambleAware Harm Minimisation conference in December 2016.
- 48. We published a Research Governance and Commissioning Procedure<sup>12</sup> in May 2016 to clarify responsibilities for each step of the commissioning process, not least the fact that research priorities and research briefs are determined by us, not GambleAware. In December 2016 we published, and invited comments on, a detailed research programme setting out our current view of the priorities for research to be commissioned from April 2017 onwards to support the Strategy.
- 49. We hope these changes will help to address any remaining misapprehensions about the credibility and independence of gambling research commissioned by GambleAware.

#### Focus in year two

In the forthcoming year, we and GambleAware will implement the new approach to research commissioning set out in the Research Governance and Commissioning Procedure. The Board will keep the research programme under review; and GambleAware will continue to commission the underlying projects.

It is important that industry continues to make data available for research purposes. To help facilitate this process, GambleAware will investigate the creation of a central reporting framework and database which would make data more widely available and would reduce the requirement for ad hoc requests to the industry.

In an effort to remove any (unjustified) lingering perception that GambleAware-commissioned research is not independent of the industry, further consideration should be given to replacing the present voluntary funding system of funding for Research, Education and Treatment with a statutory levy.

<sup>&</sup>lt;sup>12</sup> Research Commissioning and Governance Procedure, Responsible Gambling Strategy Board, September 2016

#### Priority action 11: Horizon scanning

**Progress: Amber** 

- 50. Horizon scanning is important if emerging risks to responsible gambling are to be anticipated and mitigated before they become entrenched. In the past year, the Gambling Commission has enhanced its risk-based approach to identifying priorities and targeting resources to provide better thematic insights on topics of importance. It has also published a position paper on the emerging issues of virtual currencies, eSports and social casino gaming.<sup>13</sup> It is planning to publish its first Risk Outlook in March 2018.
- 51. Operators and industry trade associations continue to monitor emerging market trends for their own commercial purposes. We would like to see more being done to combine this with a greater focus on identifying social responsibility risks that might come from their product innovations. We suspect there is greater scope to exchange information about potential emerging issues and to discuss ways of responding to them.

#### Focus in year two

All stakeholders should continue efforts to identify emerging risks to safe play, share their insights and analysis more widely, and look for opportunities to discuss appropriate ways to mitigate harm.

#### Priority action 12: Public engagement

**Progress: Amber** 

- 52. The Gambling Commission published a consumer engagement plan in October 2016 and is increasingly incorporating the public voice into how it shapes its thinking and in the design of new initiatives such as the Information to Players projects. Examples of this are also evident in the joint programme of work with the Competition and Markets Authority (CMA) where the CMA engaged directly with gambling consumers and asked them to feed in their experiences. This engagement subsequently shaped the scope of the investigation into whether online gambling firms are treating their customers fairly.
- 53. Some operators have responsible gambling teams in regular contact with gamblers, and some trade associations have engaged the wider public through focus groups, interviews and survey questionnaires on some of their projects. GambleAware has redesigned the <a href="mailto:begambleaware.org">begambleaware.org</a> website to be more user-friendly and has launched a risk-takers campaign aimed at 16-24 year olds. GambleAware is also setting up an 'Expert by Experience Panel' to increase service-user involvement in the development of its treatment, harm prevention and harm minimisation activities.
- 54. There is undoubtedly more that could be done by researchers, operators and others, consistently with the Gambling Commission's approach, to ensure that fruitful use is made of the insights of problem gamblers and other players in developing this strategy.

#### Focus in year two

Our Research Programme emphasises the importance of methodologies that provide sufficient opportunities to capture the views of members of the public, including gamblers and others affected by their gambling. We have also drawn attention under Priority Action 6 to the role that consumers can play in the development of ideas for harm-mitigation pilots.

GambleAware should publish the evaluation of its risk takers campaign and build on the findings for future campaigns targeted at this age group.

<sup>&</sup>lt;sup>13</sup> Virtual currencies, eSports and social casino gaming - position paper, Gambling Commission, March 2017

#### **IV.** Conclusion

- 55. The National Responsible Gambling Strategy set out an ambitious set of objectives, all of which in our view, and in the view of those we have consulted in preparing this progress report, remain as valid today as when the Strategy was agreed. No-one should be in any doubt about the challenges which will have to be met if satisfactory progress towards these objectives is to be achieved.
- 56. One year into the three-year Strategy we have been able to report some progress against all of the 12 priority actions set out in the Strategy. But there have also been some disappointments, not least the, as yet, relatively slow implementation of harm mitigation pilots and the limited number of evaluations completed or in progress. It is clear that much remains to be done if the Strategy is to prove a success in terms of demonstrable reductions in harm.
- 57. We will work with the Gambling Commission and GambleAware to identify ways of accelerating progress in those areas identified as being off-track with the objective of improving the pace of delivery. We will also do more where we have identified any shortfalls of our own, communicate our findings with operators and talk to them about how they can most effectively respond.
- 58. Over the next year we will want to see significant efforts put into all the priority actions, but in particular into:
  - Taking forward phase two of the research to develop measurable indicators of gambling-related harm, which will enable us to demonstrate the impact of the Strategy as a whole
  - ii. Encouraging other relevant agencies to recognise gambling-related harm as the public health issue it is, and reflect that in their spending decisions, interventions with clients, staff training and data collection
  - iii. Further embedding the culture of evaluation that has begun to develop across the industry, improving its focus on impact and sharing the findings more widely so that others can learn from them
  - iv. Turning recommendations from research, or insights from players and others, into new pilots and interventions.

Responsible Gambling Strategy Board
June 2017

#### **Annex A: Summary of actions**

This annex contains more detail on many of the research projects, industry initiatives and other actions that have been delivered in the 12 months since the publication of the new Strategy. It does not include initiatives relevant to the Strategy that were in place before April 2016. The list is not exhaustive and does not include details of operator-led projects, but attempts to capture a large proportion of what has happened at a national and sector level.

#### **Priority action 1: Understanding and measuring harm**

- GambleAware commissioned phase 1 report of the PwC/Responsible Gambling Council of Canada research to inform practical applications of harm minimisation for remote gambling operators.
- GambleAware commissioned phase 2 report of the PwC/Responsible Gambling Council of Canada research to inform practical applications of harm minimisation for remote gambling operators.
- Completion and publication of the GambleAware commissioned phase 1 report by PwC on measuring gambling-related harm (March 2017).

### Priority action 2: Engagement with relevant public sector bodies and other agencies to encourage greater sharing of responsibility for delivering the strategy

- Publication of a position paper on gambling-related harm as a public health issue by the Responsible Gambling Strategy Board (December 2016).
- Completion and publication of the GambleAware commissioned research by the Institute for Public Policy Research (IPPR) on the cost of problem gambling (December 2016).
- Launch of the GambleAware Local Government Association pilot scheme with two public health partnership initiatives with Leeds City Council and West Sussex underway.

#### Priority action 3: Consolidating a culture of evaluation

- Publication of an industry Evaluation Protocol by the Responsible Gambling Strategy Board (April 2016).
- Appointment of a panel of suppliers with evaluation expertise by GambleAware (July 2016).
- Delivery of evaluation training to industry operators by GambleAware.
- Completion and publication of the PwC evaluation of the Association of British Bookmakers Player Awareness System (PAS) (October 2016).
- Development and publication of evaluation specific support materials by GambleAware on InfoHub (March 2017).
- Completion of the first stage of the SENSE evaluation by the National Casino Forum.
- Ongoing review of whether operators are conforming to the Playing Safe Principles by the National Casino Forum.
- Development and publication of an impact evaluation framework for Multi-Operator Self-Exclusion Schemes by the Gambling Commission.

### Priority action 4: Increased understanding of the effects of product characteristics and environment

- Completion and publication of the GambleAware commissioned research on the Secondary analysis into Category B2 and B3 gaming machines (May 2016).
- Completion and publication of the GambleAware commissioned research on Tracked play on B1 gaming machines in British casinos (June 2016).
- Publication of a Gambling Commission consultation on Remote gambling and software technical standards (October 2016).
- Completion and publication of the GambleAware commissioned research on Key issues in Product Based Harm-Minimisation (December 2016).

- Completion and publication of the GambleAware commissioned research on Gambling behaviours over time: a follow up study to a survey of loyalty card holders (January 2017).
- Provision of data by SG Gaming and Inspired Gaming from machines located in licensed betting offices (LBO), adult gaming centres (AGC) and bingo venues.

#### Priority action 5: Improving methods of identifying harmful play

- Completion and publication of the GambleAware commissioned research on behalf of the Bingo Association into Problem gambling in licensed bingo premises (July 2016).
- Completion and publication of the PwC evaluation of the Association of British Bookmakers Player Awareness System (PAS) (October 2016).
- Completion and publication of the GambleAware commissioned research on Young people, gambling and gambling-related harm: pathways into and out of danger (March 2017).
- Research commissioned by the National Casino Forum and delivered by Focal Research to identify harmful machine play in five major casino operators (ongoing).
- Participation by Grosvenor Casinos in the GambleAware commissioned research study to track play on B1 gaming machines in British casinos.
- Bingo Clubs carried out over 2,000 know your customer (KYC) interventions in 2016 leading to 50 enforced suspensions.
- One of the large lottery providers is embarking on a loyalty card scheme for retail players to monitor spending patterns instore, and intervene where they believe a player to be at-risk of gambling-related harm.

#### **Priority action 6: Piloting interventions**

- Responsible gambling messaging is presented continuously as an integral part of broadcast, print and shop-front advertising by Senet members to build public awareness of the problem gambling behaviours and enable them to raise concerns with friends and family. The campaign also encourages gamblers to reflect on their gambling habits.
- The Association of British Bookmakers increased the number of mandatory time and spend limits on B2 machines (July 2016).
- The Association of British Bookmakers introduced refreshed top screen messages (July 2016).
- The Association of British Bookmakers introduced a Roadmap for Player Protection (August 2016).
- Launch of the Association of British Bookmakers Don't Gamble with Health pilot project in partnership with Betknowmore UK to provide outreach support and resources to customers in Islington experiencing gambling-related harm (October 2016).
- Launch of the Association of British Bookmakers combined responsible gambling
  project in London's Chinatown with its major operators and the Chinese National
  Healthy Living Centre to raise awareness, provide support and signposting, explore
  cultural attitudes to gambling and develop a network of local 'Ambassadors'.
- Completion of a small study by the National Casino Forum of Game Chooser which indicates the volatility of games on IGT machines.
- The National Casino Forum contributed to the development of the social responsibility features of the SlotGuru App, a new and unique service that provides key information on casino slot games directly to a players' mobile phone.
- Launch of a GamCare pilot project with Cheshire Police looking at screening for problem gambling at the point of arrest.

#### Priority action 7: Self-exclusion

 More than 6,000 customers have been enrolled on to the National Casino Forum's Self-Enrolment National Self-Exclusion Scheme (SENSE) since its launch in August 2015 and the first-stage of its on-going evaluation is now completed.

- The Gambling Commission has worked closely with the industry to ensure all landbased Multi-operator schemes are in operation and continues to support the Remote Gambling Association as they develop the National Online Self Exclusion Scheme (NOSES) (ongoing).
- The Gambling Commission carried out targeted compliance to assess awareness of Multi-operator schemes across the industry and fed back the results to schemes owners and the industry (March 2017).
- Development and publication of an impact evaluation framework for Multi-Operator Self-Exclusion Schemes by the Gambling Commission.
- Responsibility for the national retail bookmaker Central Multi-Operator Exclusion Scheme is assumed by Senet who provide support, guidance materials and pre-paid correspondence to bookmakers. There are now over 3,000 individuals registered with the scheme and Senet continue to facilitate information sharing across operators, looking in particular at data breaches or attempted breaches of self-exclusion (ongoing).
- Integration of the two Adult Gaming Centre self-exclusion schemes completed (November 2016).
- Launch of the Industry Group for Responsible Gambling 'Opt-in to Self-Exclude' scheme.
- Since the launch of the National Bingo Self-Exclusion Scheme there have been around 900 self-exclusions of which 100 attempted breaches have been prevented.
- Completion and publication of the GambleAware commissioned evaluation of the land-based multi-operator self-exclusion scheme (March 2017).
- Completion and publication of the GambleAware commissioned Evaluation of the Multi-Operator Self-Exclusion Scheme (MOSES) (March 2017).

#### Priority action 8: Education to prevent gambling-related harm

- Completion and publication of the GambleAware commissioned literature review of children and young people's gambling (April 2016).
- During 2016 Senet has been supporting a Young Gamblers charity initiative to
  educate and empower teachers and others to address gambling issues with the
  young people they work with. The project is nearing conclusion and measured
  impacts are expected shortly.
- The National Casino Forum hosted a workshop with the Alzheimer's Society to explore good practice in engaging and managing customers who have mental health difficulties.
- GamCare is working with three partner agencies to expand its youth outreach programme into four new areas of the UK.
- The Association of British Bookmakers hosted National GambleAware Week (July 2016).

#### Priority action 9: Building the quality and capacity of treatment

- Publication of a new specification for GambleAware funded treatment services (June 2016).
- Publication of a Brief Intervention Guide for use in non-specialist settings by GambleAware (March 2017).
- Continued facilitation of the GambleAware National Clinicians Network Forum (quarterly).
- Publication of GambleAware updates on wait times for assessment and treatment (quarterly).
- Analysis and publication of aggregate statistics on Gambling Treatment in Great Britain in 2015-2016 from the Data Reporting Framework.
- Discussions underway to make the Data Reporting Framework available through the National Drug Evidence Centre (NDEC) at the University of Manchester GambleAware (ongoing).

### Priority action 10: Widening and strengthening the research field and improving knowledge exchange

- Publication of a research governance and commissioning procedure by the Responsible Gambling Strategy Board (May 2016).
- Publication of a Research Programme for 2017 to 2019 by the Responsible Gambling Strategy Board (December 2016).
- Appointment of a new Director of Research and Evaluation at GambleAware (February 2017).
- Sponsorship of three new PhD students by GambleAware (November 2016).
- Redesign and relaunch of the GambleAware InfoHub (January 2017).
- Launch of the GambleAware innovative applied research grant programme to support original and creative projects that help deliver or extend the National Responsible Gambling Strategy and its own charitable objectives (August 2016).

#### **Priority action 11: Horizon scanning**

- Publication of the Gambling Commission's discussion paper on virtual currencies, eSports and social gaming (August 2016).
- Publication of the Gambling Commission's position paper on virtual currencies, eSports and social casino gaming – position paper (March 2017).

#### **Priority action 12: Public engagement**

- Publication of the Gambling Commission's consumer engagement plan (October 2016).
- Launch of a joint Gambling Commission and Competition and Markets Authority (CMA) investigation into unfair terms and conditions (October 2016).
- Redesign and relaunch of the **GambleAware** website.
- Launch of a new GambleAware risk-takers campaign aimed at 16-24 year olds (February 2017).
- Redesign and relaunch of the <u>Gambling Commission</u> website to be more consumer facing (January 2017).