[redacted]

From: [redacted]
Sent: 19 September 2024 09:04
To: [redacted]
Subject: RE: Fee Upgrade Evidence

No probs. 😊

Kind regards
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, September 18, 2024 2:25 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Fee Upgrade Evidence

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Hi[redacted],
Thanks for coming back to me - he thinks it's just a generic email now he's read it again. Appreciate your help though thank you!
Sent from my iPhone

> On 18 Sep 2024, at 10:30, [redacted]@gamblingcommission.gov.uk> wrote:
>
> Hi[redacted]
>
> I'm not sure as this is more of a licensing issue. Do you have the licensee's name, maybe there is something on file that could clarify?
>
> Thanks
> [redacted]

<image001.jpg>

[redacted]
[redacted]
[redacted]
www.gamblingcommission.gov.uk

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<image002.png>

From: [redacted]@bacta.org.uk>
Sent: Tuesday, September 17, 2024 11:54 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Fee Upgrade Evidence
Importance: High

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Hi [redacted],
I hope you are well! Just a quick question please if you don't mind? I've an operator who has increased his fee category as he thinks he may end up over his current one and wanted to go up in good time before his year end. However when he did an email went into his spam (so he's just found it) asking for evidence by the 19th. He's not sure what evidence is required, neither am I and he can't get through to anyone to speak to about it. Any assistance would be appreciated.

Kindest regards

[redacted]

[redacted]

[redacted]

[redacted]

Mobile: [redacted]

E-mail: [redacted]

<image003.png>

29-30 Ely Place

London

EC1N 6TD

GAMBLING COMMISSION

26/11/2024

Dear Licensee,

Raising Compliance Standards in the Land Based Arcade Sector – for action

We write following recent assessment work conducted by the Gambling Commission ('the Commission') across the land-based arcade sector. This work identified some priority issues we wish to make you aware of to raise standards across the industry.

We invite you to review key elements of your business to ensure you are meeting the requirements of the Licence Conditions and Codes of Practice ('LCCP').

We would like you to review the controls you have in place for:

- Customer interaction: identifying and interacting with customers who may be at risk of gambling related harm and evaluating those interactions and the effectiveness of your overall approach.
- Anti money laundering and counter terrorist financing ('AML/CTF'): assessing and identifying risks associated with anti-money laundering and terrorist financing activity, and implementing policies, procedures and controls to mitigate those risks.

These are important conditions of your licence. Customer interaction is key so that operators to are proactive in identifying harm: interacting to manage risk and evaluating the impact of action you have taken to see whether further enhanced action is necessary. Anti-money laundering and counter terrorist financing (AML/CTF) controls protect your business from being involved in the flow of money from criminal sources, which could lead to you being involved in serious criminal offences.

It is important you read and understand this letter and act where required.

The key themes identified in our assessments are summarised below:

disability confident COMMITTED

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Customer interaction

- Operator policies and controls did not always include the key criteria that may indicate a customer is at risk of, or experiencing, gambling related harm. This means customers at risk of harm may not be identified.
- Employees conducting interactions did not always demonstrate awareness of why they were conducting interactions. Staff should be trained in identifying potential indicators of harm, how to conduct a customer interaction, and what to do if the behaviour or concern continues. They should be clear on what the aim of conducting an interaction is, how to record the outcome and how to monitor behaviour in case follow up action is needed.
- Operators are not checking whether interactions are working effectively, whether follow up action is required, or whether the interaction was appropriate for the type of harm (or potential harm) identified. Evaluation (or reviewing the effectiveness) of customer interactions is a 'must do' as part of the conditions of your licence.
- Operators were not always able to demonstrate they had taken the Commission's Guidance on Customer Interaction for Premises Based Operators into account. Our guidance is not itself mandatory but must be considered when controls are designed for your businesses. These controls must ensure the requirements of SR Code 3.4.1 are met.

Anti-money laundering and terrorist financing ('ML/TF')

- The operator's Money Laundering and Terrorist Financing Risk Assessment ('MLTF RA') did not always consider all relevant risks, including those found in guidance we provide to you and in our ML/TF risk assessment of the British gambling industry. You need to review these documents and ensure you have captured all relevant risks and any additional risks that you think your business may face within your MLRA. Please refer to the AML checklist to see details of where to find the guidance we provide to you and our ML/TF risk assessment of the British gambling industry.

To help you comply with the conditions of your Operating Licence, we have provided more information and checklists below about the specific licence conditions that you must meet. The checklists are there to help you assess whether you have reviewed the key areas of focus that we have included in this letter.

It is your responsibility to ensure you comply with the conditions of your Operating Licence. You must have processes in place to check that you are compliant across the whole business.

Customer Interaction

Social Responsibility (SR) Code 3.4.1 – Customer Interaction

This SR Code consists of four requirements:

- The requirement to identify customers who may be at risk of, or experiencing, gambling related harm.

- The requirement to interact with customers who may be at risk of, or experiencing, gambling related harm.
- The requirements to understand (evaluate) the impact of the interaction on the customer, and the effectiveness of your actions and approach to customer interaction.
- The requirement to take the Commission's guidance on customer interaction into account. The guidance sets out why customer interaction is important and makes our expectations clear. For compliance and enforcement purposes, we will expect licensees to demonstrate how their policies, procedures **and practices** meet the required outcomes. This can be through implementing relevant parts of the guidance or demonstrating how and why implementing alternative solutions equally meet the outcomes.

Reminder of key customer interaction requirements and guidance

This does not replace the customer interaction guidance, which must be taken into account.

LCCP requirement	**Action**	**Date reviewed**
Social Responsibility Code 3.4.1, Para 2	Review the Commission's Formal Customer Interaction Guidance for Premises Based Operators.	
Social Responsibility Code 3.4.1, Para 2	Ensure you have taken the Formal Customer Interaction Guidance for Premises Based Operators into account when developing your approach to customer interaction.	
Social Responsibility Code 3.4.1 Para 1a	Set the indicators of harm that will prompt an interaction and how you will identify these in your venues.	
Social Responsibility Code 3.4.1, Para 1b	Train staff to identify customers who may be at risk of harm, or who are experiencing harm so that you are able to interact early and quickly.	
Social Responsibility Code 3.4.1, Para 1b	Train staff to interact with customers who might be experiencing, or at risk of experiencing, gambling related harm, and to record these interactions appropriately. Train staff to interact in a way that is appropriate to the severity of the potential harm.	
Social Responsibility Code 3.4.1, Para 1c	Provide staff with clear systems and procedures for recording and reviewing interactions, which captures relevant data including the observations that prompted the interaction, the action taken, and the outcome. Train staff to make use of all relevant sources of information to guide and deliver effective customer interactions, including records of previous interactions.	

Social Responsibility Code 3.4.1, Para 1c	Put processes in place to understand the impact of each individual interaction on a consumer's behaviour and whether, or what, further action is needed.	
Social Responsibility Code 3.4.1, Para 1c	Understand the effectiveness of your approach by trialling and measuring impact. Embed lessons learned and best practice across the business and collaborate to share across the industry.	
Social Responsibility Code 3.4.1	Ensure you have appropriate mechanisms in place to check compliance with these requirements across each of your premises.	

Anti-money laundering

LC 12.1.1 - Prevention of money laundering and terrorist financing

This Licence Conditions consists of three parts:

- The requirement to assess the risk of your business being used for money laundering or terrorist financing.
- The requirement, once the risk assessment has been produced, to ensure that you have appropriate policies, procedures and controls to prevent money laundering and terrorist financing and address the risks detailed in your risk assessment.
- The requirement to ensure your money laundering and terrorist financing policies, procedures and controls are effectively implemented, reviewed and revised as appropriate so they remain effective, and to ensure that they take account of any applicable learning or guidelines published by the Commission.

Ordinary Code 2.1.2 – Anti money laundering other than casino

This is an Ordinary Code provision that sets out good practice. You may adopt an alternative approach if you have actively taken account of the Ordinary Code and can demonstrate the alternative approach is reasonable in your circumstances or that your alternative approach is similarly effective.

Ordinary Code 2.1.2 specifies that operators should take account of the Commission's advice on the Proceeds of Crime Act 2002 ('POCA advice'): Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators.

The following checklist details and reiterates the requirements and is intended to assist operators.

Anti-money laundering and terrorist financing checklist

LCCP requirement	**Action required**	**Date reviewed**

Licence Condition 12.1.1 Para 1	Assess the risk of your business being used for money laundering and terrorist financing. • Ensure the risk assessment is appropriate and takes account of changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic, or other material changes. • Assess Money Laundering risk regarding country and geographic risk, customer risk, transaction risk, and product risk, as a minimum. • Review the Commission's risk assessment of Money Laundering and Terrorist Financing in the British gambling industry, and take it into account when developing your Money Laundering Risk Assessment ('MLTF RA').	
Licence Condition 12.1.1 Para 1 and Para 3	Regularly check the Commission's AML Hub for updates, public statements, and emerging risks on anti-money laundering and terrorist financing that you may need to take into account.	
Licence Condition 12.1.1 Para 1	Review your MLTF RA to take account of changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, updates to the Commission's own MLTF risk assessment of the British gambling industry, at least annually.	
Licence Condition 12.1.1 Para 2	Put processes in place to ensure your money laundering policies, procedures, and controls are effectively implemented. These measures should, among other things, include effective training for staff on your money laundering and terrorist financing risks, controls and expectations.	
Licence Condition 12.1.1 Para 2	Put processes in place to ensure your money laundering policies, procedures, and controls are effectively implemented. These measures should, among other things, include effective training for staff on your money laundering and terrorist financing risks, controls and expectations.	
Licence Condition 12.1.1	Review your AML/TF policies, procedures, and controls to ensure they remain effective. This review	

Para 3	should be conducted whenever the MLTF RA is updated or reviewed.	
Licence Condition 12.1.1 Para 3	Ensure your AML/CTF policies, procedures, and controls (including your MLTF RA) take account of applicable learning or guidelines published by the Commission, including public statements and the Gambling Commission's current risk assessment of money laundering and terrorist financing risk in the British gambling industry.	
*Ordinary Code 2.1.2	Demonstrate you have taken account of the Commission's advice on the Proceeds of Crime Act 2002 ('POCA advice'): Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators	
*Ordinary Code 2.1.2	Monitor all transactions or activity using a risk-based approach, recording what has been done, and why.	
*Ordinary Code 2.1.2	Where a customer is assessed as higher risk, collect additional information in respect of that customer.	
*Ordinary Code 2.1.2	Ensure you 'Know Your Customer'. Be satisfied that the sources of information used for KYC checks are suitable to mitigate the full range of risks to which you might be exposed.	
*Ordinary Code 2.1.2	Clearly communicate policies, procedures, and controls to all employees.	
*Ordinary Code 2.1.2	Have robust mechanisms in place to ensure policies, procedures and controls are implemented effectively, weaknesses are identified, and improvements are made and recorded where necessary.	
*Ordinary Code 2.1.2	When establishing a relationship with a customer, consider: • the potential money laundering risk posed by the customer. • whether it is necessary to do Know Your Customer ('KYC') or due diligence checks on the customer. • whether it is known or suspected that the customer may launder money (including criminal spend). (Please refer to the Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators for a definition on when a customer relationship is formed).	

*Ordinary Code 2.1.2	Monitor customers who, through their customer profile or known pattern of gambling activity, appear to pose a risk of actual or potential money laundering.	
*Ordinary Code 2.1.2	Ensure the arrangements you have in place to monitor customers across outlets and products are sufficient to manage the risks your business is exposed to.	
*Ordinary Code 2.1.2	Consider ending the customer relationship where: • it is known that the customer is attempting to launder criminal proceeds or use your business for criminal spend. • where you consider the risk of breaches to POCA to be too high. • where the customer's gambling activity leads to a steadily increasing level of suspicion, or actual knowledge, of money laundering.	
*Ordinary Code 2.1.2	Seek a defence from the NCA (referred to as a Defence Against Money Laundering or DAML SAR) where you have terminated the relationship with a customer, and you know or suspect they have engaged in money laundering, before paying any winnings or returning funds to the customer.	
*Ordinary Code 2.1.2	Have a system in place for submitting SAR's (Suspicious Activity Reports) to the National Crime Agency.	
*Ordinary Code 2.1.2	Consider appointing a Nominated Officer to help you meet your obligations under the Proceeds of Crime Act 2002 and Terrorism Act 2000. Where appointed, this individual must hold a Personal Management Licence.	
*Ordinary Code 2.1.2	Submit a SAR to the National Crime Agency as soon as practicable if you suspect a person is engaged in money laundering.	
*Ordinary Code 2.1.2	Ensure your staff are trained to be alert to the risks of money laundering and in the identification of activities or transactions which appear to be suspicious.	
*Ordinary Code 2.1.2	Ensure your staff are aware of: • their responsibilities for the detection and prevention of money laundering. • the money laundering risks your business faces. • your procedures for managing those risks.	

	• the identity and responsibilities of the nominated officer (where one has been appointed) or person responsible for making reports to the NCA. • the potential effect of a breach of POCA on your organisation.	

** Ordinary Codes set out good practice. You may adopt an alternative approach if you have actively taken account of the Ordinary Code and can demonstrate the alternative approach is reasonable in your circumstances or that your alternative approach is similarly effective. Ordinary Codes are admissible in evidence in criminal or civil proceedings and must be considered where the Court or Tribunal think them relevant, and by the Commission in the exercise of its functions. Any departure from Ordinary Codes can be considered by the Commission on a licence review but cannot lead to a financial penalty.*

The reminders and checklist we have provided relate to key issues identified during recent assessments. They are not intended to form an exhaustive list of requirements, and do not supersede existing LCCP requirements.

Next steps

The Commission will be working with BACTA and other operators directly to ensure messages from this letter are clearly received.

[redacted], is delivering a speech summarising our findings to the BACTA Convention on 28 November 2024, and this will be published on our website shortly after.

We are planning a programme of education workshops in early 2025 to support operators' understanding of the key issues. We will contact you with details of these workshops when they are available.

Compliance assessments and follow up assessments will be conducted in 2025 to assess progress in these areas.

Should you have any questions concerning this letter, please contact us at ComplianceAction@gamblingcommission.gov.uk.

Yours sincerely

[redacted]

[redacted]

From: [redacted]
Sent: 27 November 2024 11:35
To: [redacted]@bacta.org.uk)
Subject: Letter to AGC's
Attachments: AGC project letter to Operators.pdf

Hi [redacted],

The letter I alluded to is attached. Should go out to all later today/tomorrow,

Regards

[redacted]

[redacted]

[redacted]

GAMBLING

COMMISSION

[redacted]@gamblingcommission.gov.uk

www.gamblingcommission.gov.uk

Confidential Call line 0121 230 6655

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Think of the environment before printing out this message

[redacted]

From: [redacted]
Sent: 03 December 2024 10:47
To: [redacted]
Subject: RE: Reporting of Suicide

Morning [redacted]

Just coming back to you on the suicide reporting query you had. There is no time elapsed cut off so any instances of becoming aware of a customer past or present should be reported. Here's a link to guidance, the info on reporting is about half way down the page. LCCP Information requirements - LCCP notifications (other reportable events) . Hope this helps.

Is there any update on the Arbroath operator and the expedited portal access?

Kind regards
[redacted]

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[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Friday, November 29, 2024 3:27 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Reporting of Suicide

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Hi [redacted]
Thanks for the info.

Regarding Arbroath, I'm not sure that he would be aware. As you know there are still operators who believe that if they are the only operator in town then they don't need MOSES, a misunderstanding that we have regularly emailed members about but obviously non members would remain under that misunderstanding. I'll check with the office to see if Portal access has been expedited.

Thanks again and have a great weekend.

Kindest regards

[redacted]

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, November 29, 2024 3:17:09 PM
To: [redacted]@bacta.org.uk>
Subject: RE: Reporting of Suicide

Hi [redacted]

I'll need to enquire internally on the suicide reporting requirement question. I'll get back to you soon.

Premises 'on' licensed for alcohol have an automatic entitlement to have two gaming machines of either cat C or D, provided that the relevant licensing authority or licensing board (Scotland) is notified, so no operating licence required. A link to GC website info: https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/page/c-gaming-machines

When we spoke the other day, you mentioned that operators can use your MOSES until they become a member, would the Arbroath applicant be aware of this?

The Glasgow event hasn't been finalised yet, but I'm likely to be involved!

Kind regards
[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Friday, November 29, 2024 1:09 PM
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Reporting of Suicide

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Hi [redacted]
I hope you are well. Firstly we have received an application from an operator in Arbroath - it will be discussed for approval at the next National Council meeting on 12th December after which time I will make contact and arrange a visit.

I'm sorry to bother you with this one but I've had a query from a member regarding the reporting of suicides. He has asked if there is a timescale where the reporting is not appropriate e.g. if it's been over 2 years since the individual has gambled in the premises, or if any and all must be reported regardless.

Lastly, can I just check the situation with pubs and gaming machines? Can a publican buy/rent maximum of 2 cat C's and not be required to have an operator's licence?

I understand from [redacted] that we've to have a roadshow in Glasgow which is great news. Hopefully see you there!
Kindest regards

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

bacta
Empowering the UK's amusement machine industry

29-30 Ely Place

London

EC1N 6TD

[redacted]

[redacted]

Web: www.bacta.org.uk

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Don't forget to follow bacta and tickets2wishes on social media - Support #Tickets2Wishes to help Rays of Sunshine grant wishes to children with terminal or life-limiting conditions

@bactauk @tickets2wishes

[redacted]

From: [redacted]@bacta.org.uk>
Sent: 17 December 2024 08:20
To: [redacted]
Subject: RE: Evaluation of multi-operator self-exclusion

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Hi [redacted]

Sorry I haven't got back to you sooner.

Thanks for this.

Speak soon.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 06 December 2024 16:47
To: [redacted]@bacta.org.uk>
Subject: Evaluation of multi-operator self-exclusion

Hi [redacted]

Thanks again for visiting VSH yesterday. I promised to signpost you to some evaluation of multi-operator self-exclusion that has taken place over the years. Please find attached two reports undertaken by Ipsos Mori on all of the schemes. Please find links to two on GAMSTOP below, the Ipsos one is recent and the Sonnet one from 2021.

Ipsos report (gamstop.co.uk)

https://www.greo.ca/en/greo-resource/resources/Documents/Sonnet-Advisory-and-Impact-2021_-GAMSTOP-Evaluating-online-self-exclusion-scheme.pdf

Have a good weekend and I'll see you in the SESOG meeting on Monday

Kind regards

[redacted]

[redacted]

Victoria Square House
Victoria Square
Birmingham
B2 4TP

[redacted]

From: [redacted]@bacta.org.uk>
Sent: 28 January 2025 13:40
To: [redacted]
Cc: [redacted]
Subject: RE: SESOG - information reporting
Attachments: BactaReport-2024-Q4.xlsx; BactaReport-2024-Q3.xlsx

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Hi [redacted]

Sorry for the delay in getting this to you, I have only recently received it.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 24 January 2025 10:20
To: [redacted]@bacta.org.uk>
Subject: SESOG - information reporting

Hi [redacted]

Hope you're well.

Please would you send me the quarterly information reporting figures for July to September and October to December 2024 – here is the link to the question set Guidance on self-exclusion scheme provider information reporting

We are planning to present some of the data at Thursday's meeting and all the other schemes have submitted their figures so if you could send this through as soon as possible, that would be great. Some of the data in the presentation will be broken down by scheme so we need to include the Bacta stats to make this meaningful.

Kind regards

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[redacted]
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[redacted]

From: [redacted]@bacta.org.uk>
Sent: 07 March 2025 13:53
To: [redacted]
Subject: RE: Joint working visits

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Hi [redacted]

Are you free for a quick phone call ?

I'm on [redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 04 March 2025 14:26
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Joint working visits

Thanks [redacted]. Look forward to hearing from you.

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 4, 2025 2:23 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: Joint working visits

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Hi [redacted]

I'm with [redacted] tomorrow.
We'll try and sort something out then and get back to you Thursday/ Friday

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 11:06:02 AM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Joint working visits

Hi [redacted]

Hope you are both well?

I'm looking forward to meeting up with you both out on the 'shop floor'. If possible, I would like to carry out our premises visit(s) before the end of the month,
would either **Friday 21st** or **Monday 24th** work for you?

In terms of location, I would happy travelling along the coast to say Hampshire / Dorset or up to the Thames Vally / South London.

If planning would be easier via a Teams call then please let me know and I'll set one up.

Look forward to hearing from you.

Regards

[redacted]

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

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This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

[redacted]

From: [redacted]
Sent: 10 March 2025 14:47
To: [redacted]
Cc:
Subject: RE: Joint working visits

Hi [redacted]

If you can't make the 24th I'd be happy to meet with separately, once your availability has settled down.

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, March 10, 2025 11:23 AM
To: [redacted]@bacta.org.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: RE: Joint working visits

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Hello [redacted]

Thank you for the invitation and you time re the visit or the 24th March. [redacted]
If that's the case, I will have to leave it with [redacted]

Hopefully I will see you there

Many thanks

[redacted]

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Empowering the UK's amusement machine industry

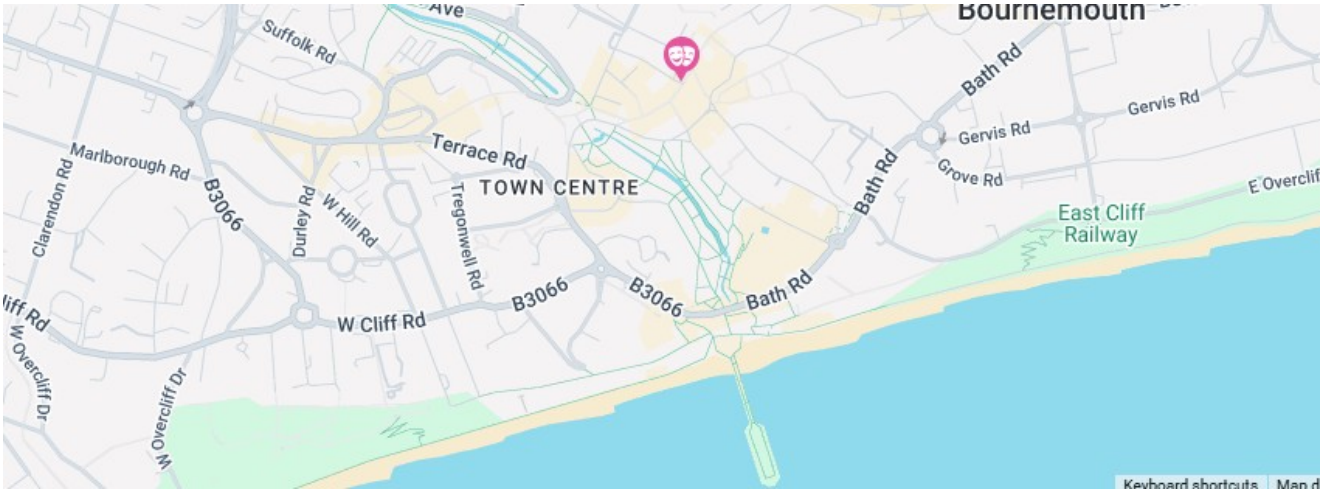
From: [redacted]@bacta.org.uk>
Sent: 07 March 2025 15:03
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>

Cc: [redacted]@bacta.org.uk>
Subject: RE: Joint working visits

Hi [redacted]

Details of the venue for the 24th

J Holland & Sons Ltd
T/A Trident Casino Slots
49-51 Old Christchurch Road
Bournemouth
Dorset
BH1 1DT



They will be expecting us around 11.30. I was thinking maybe we could meet for a coffee about 11ish

I'll give you a bell next Friday

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 04 March 2025 14:26
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Joint working visits

Thanks [redacted] Look forward to hearing from you.

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 4, 2025 2:23 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: Joint working visits

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

Hi [redacted]

I'm with [redacted] tomorrow.
We'll try and sort something out then and get back to you Thursday/ Friday

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 11:06:02 AM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Joint working visits

Hi [redacted]

Hope you are both well?

I'm looking forward to meeting up with you both out on the 'shop floor'. If possible, I would like to carry out our premises visit(s) before the end of the month,
would either **Friday 21st** or **Monday 24th** work for you?

In terms of location, I would happy travelling along the coast to say Hampshire / Dorset or up to the Thames Vally / South London.

If planning would be easier via a Teams call then please let me know and I'll set one up.

Look forward to hearing from you.

Regards

[redacted]

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

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GAMBLING COMMISSION

Dear [redacted]

Thanks for your email dated 20 February 2025.

The Gambling Commission (GC) meets the requirements of the Regulators' Code. We publish advice on our website and within formal guidance documents to assist licensees with compliance of our licence conditions and codes of practice. We have also published our licensing, compliance and enforcement policy statement to provide clarity around our approach to compliance. In addition to this we also provide a substantial engagement letter, where head office reviews are conducted, that outlines the approach we will take to each assessment we undertake. To enhance this approach, we have also historically published enforcement reports and included the use of public statements when enforcement cases have concluded.

Our assessments are not full audits and are conducted to understand what controls are in place, including how they are implemented in practice at the time of the assessment. We may identify different examples of a behaviour or competence during a particular assessment which may impact our findings. If something that ought to have been identified is (unfortunately) not identified during a particular assessment, that does not of course mean that a licensee can rely on it never being raised in a future assessment.

As a regulator, we strive to continually improve the quality of our assessments and to ensure that our compliance work is achieving appropriate coverage of different sectors. Both of these areas are a matter for the GC, and do not involve any departure from our published approach to compliance.

As set out in our 2024 to 2027 Corporate Strategy, we seek to keep pace with the industry and continue to improve our regulation for the benefit of consumers and the public. We welcome engagement with bodies such as Bacta as we work to improve our effectiveness and efficiency in applying our published approach to compliance.

As detailed by [redacted] at the recent Bacta roundtable meeting, I can confirm that there have been no significant changes to our approach or our interpretation of the LCCP requirements in place (which have not themselves changed).

We have however sought to increase our awareness of how operators evaluate customer interactions. We have also reviewed in more depth the written policies and procedures provided by businesses, including considering how our guidance has been taken account of within those documents. None of this involves a departure from our published approach to compliance, only an improvement in how we have been able to apply that on the ground.

Without specific examples of the concerns of your members it is difficult to fully understand what concerns relate specifically to AML/CTF requirements. Under Licence Condition ('LC') 12.1 a licensee is required to:

- Conduct a risk assessment - guidance is provided on our website detailing the risks for the arcade sector.
- Have appropriate policies, procedures and controls to mitigate those risks identified.
- Ensure policies, procedures and controls are implemented effectively.
- Ensure licensees take account of Commission guidance.

Our review of the AML risk assessment and policies and procedures considers how our guidance has been incorporated into written policies and procedures. At recent workshops it was made very clear to licensees that they were outside of the 'regulated sector' for AML but still need to meet the requirements of LC 12.1.

We have offered support and advice via workshops and offered the opportunity for Bacta member support officers to shadow our compliance staff on assessments to provide more clarity and openness around our approach. I struggle to understand how Bacta and members remain concerned when we have taken a proportionate approach to advice and raising standards rather than formal action and we have offered support to membership support officers that provides the most transparent of approaches.

We have committed a significant resource to supporting Bacta members and wider AGC providers and we have gained a significant amount of value from this engagement and we hope that Bacta and members have gained value from this activity and have a much clearer picture around how we conduct our assessment work.

I trust this addresses your concerns. We look forward to further engagement with Bacta, members and membership support officers.

Best regards,

[redacted], Gambling Commission

[redacted]

From: [redacted]
Sent: 17 March 2025 12:36
To: [redacted]
Subject: Fw: Compliance Assessments
Attachments: Bacta [redacted] Response (140325).pdf

Many thanks,
[redacted]

[redacted]

From: [redacted]
Sent: Friday, March 14, 2025 1:46 PM
To: Bacta [redacted]
Cc: [redacted]
Subject: Re: Compliance Assessments

Hi [redacted],

Apologies for the delayed response, please find attached. Any questions let me know.

Have a good weekend.

Many thanks,
[redacted]

[redacted]

From: Bacta [redacted]
Sent: Thursday, February 20, 2025 10:33 AM
To: [redacted]
Cc: [redacted]
Subject: Compliance Assessments

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important
CAUTION: This email is from an external source - be careful of attachments and links

Dear [redacted]

At a roundtable meeting between Bacta and the Gambling Commission on 5 February 2025 I mentioned concerns about a number of compliance assessments carried out by the Commission at the end of last year. These led to operators taking certain actions and I know that many have now reported back to the Commission on the steps taken.

As I stressed at the meeting, the Raising Standards initiative has been welcomed by us and we are fully engaging with Commission officials in relation to the ongoing workshops. Indeed, we look forward to the feedback on the workshops and assessments at our Bacta National Council meeting tomorrow.

However, I do want to relay legitimate concerns expressed by our members regarding the process for Commission compliance assessments of their licensed premises and more widely the framework in which the assessments sit.

The Regulators' Code states that regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply. They should ensure that their approach to regulatory activities is transparent, and consistent. Under the Code Regulators should carry out their activities in a way that supports those they regulate to comply and grow. The Code does of course apply to the Commission.

During 2023 the Commission undertook compliance assessments of a number of our members' licensed premises and their wider systems. Those assessments included review of policies and procedures on compliance with the Licence Conditions and Codes of Practice ('the LCCP'), such as those in respect of customer interactions, and anti-money laundering and terrorist financing risk assessments ('AML/CTF'). Generally, the outcome of those assessments was neutral or positive, with suggested improvements but little significant criticism.

During 2023 and 2024 there were no material changes to the LCCP relevant our members' operations, no change to AML/CTF regulations and no change in Commission guidance interpreting the LCCP or AML/CTF regulations. During this period, a number of our members updated and improved their LCCP policies and procedures. I am sure we would jointly agree this was welcome.

Irrespective of whether individual members had an assessment in 2023, members proceeded with their operations on the basis that the criteria were unchanged.
The Commission more recently conducted compliance assessments during 2024, referenced in the Commission letter dated 26th November 2024. Some of those assessments were of the same operators as those undertaken during 2023. During 2024 those members were operating similar policies and procedures to comply with the LCCP as those that had previously been assessed by the Commission during 2023. The Commission, following the 2024 assessments, identified conduct or concerns that may indicate that our members have not met some of the minimum requirements of the LCCP or AML/CTF. This is despite there being no material changes to the LCCP, regulations or Commission guidance relating to these requirements.

I have to pose the simple question: what has changed?

I appreciate that at our meeting in February [redacted] said that the only difference was that the recent assessments delved more deeply. I am afraid that does not marry with the feedback that members have given us. They report that the topics and methodology were pretty much the identical as were the policies and procedures requested, the field work carried out and the interview lengths. Our members are understandably concerned that during 2024 the Commission has changed its approach to compliance with the LCCP and AML/CTF, without previously setting that out clearly and

with explanation. Further, on AML/CTF, our members report that the Commission is treating their operations as though they were part of the AML regulated sector, and similar to casinos and online licensees. As you know, they are not part of that regulated sector and are quite different in practices and risk profile.

Significantly, it appears the Commission has changed its approach to assessments without providing clear information, guidance or advice to enable Licensees to meet their responsibilities under the LCCP and AML/CTF. Some of those members have been subject to Improvement Notices which state that "Failure to improve could result in enforcement action by the Commission and potentially fines or licence revocations" – despite in some cases operators believing that the category of concern was not justified by the substance of the findings. These circumstances seem grossly unfair, for those businesses which were acknowledged to be compliant in 2023 and then found non-compliant in 2024, despite there being no changes to the rules of compliance.

Bacta's members, (who are Commission licensees), urgently need to understand the changes in the Commission's approach to compliance assessments, which have led to the contrasting assessment outcomes between 2023 and 2024. The Commission should be providing clear published information and guidance to ensure its approach to regulatory activities is transparent, and consistent. I would hope that you would consider consulting and advising BACTA on such changes. While we welcome the forthcoming workshops, as part of engagement process we would have expected workshops to have been conducted before - not after - assessments, to inform operators of the changes.
We look forward to understanding from the Commission on how it will ensure the fair, balanced assessment of our members premises, and on support for licensees to enable compliance.

I believe that our collaborative working can help raise standards. We are willing partners. But it must be done in a fair and transparent way.

I would welcome a chance to discuss these matters with you.

Best wishes.

[redacted]

bacta
Delivering the Serious Business of Fun for 50 Years
29-30 Ely Place
London EC1N 6TD

Email: [redacted]
Main Line: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

[redacted]

From: [redacted]
Sent: 19 March 2025 14:31
To: [redacted]
Cc: [redacted]
Subject: RE: BACTA visits provisionally pencilled in for Wed 23 April – potential location of Cleethorpes/Grimsby

Hi[redacted]

Nice to speak just know. To confirm..

Monday 28 April 2025 in Southport (from noon onwards) works for me. Google Maps advises it's a c. 3 hour drive so a noon start should be fine.

I'll pop the date into my diary now and we can confirm details nearer the time.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, March 19, 2025 1:37 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: BACTA visits provisionally pencilled in for Wed 23 April – potential location of Cleethorpes/Grimsby

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Hi[redacted]

Great to see you yesterday. Good session.

I know you've been liaising with [redacted] about a GMTS visit.

We would suggest Monday 28 April 2025 in Southport (from noon onwards). We would visit an arcade at the entrance to Southport Pier and also some clubs.

Does that work for you?

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 12 March 2025 12:34
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: BACTA visits provisionally pencilled in for Wed 23 April – potential location of Cleethorpes/Grimsby

Hi [redacted]

With sincere apologies for any inconvenience this will cause, I need to request a change of date as I will be required to support [redacted] on another engagement on that date. Understandably, given the pressures on his diary, I need to flex at my end.

Having looked at my diary, I could do the Tuesday (day after the BH but not an issue for me) or Thursday of that week. Alternative options include… Mon 14 or Wed 16 April, any day week commencing Mon 28 April,,,

Cheers (and apologies again)

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

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[redacted]

From: [redacted]
Sent: 20 March 2025 09:26
To: [redacted]
Subject: RE: Joint working visits

Shall we say 09.30 Friday?

From: [redacted]@bacta.org.uk>
Sent: Thursday, March 20, 2025 9:09 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Joint working visits

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

Hi [redacted]

When is a good time to firm up plans for Monday ?

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 07 March 2025 15:10
To: [redacted]@bacta.org.uk>
Subject: RE: Joint working visits

Thanks [redacted] all sounds good, speak next week.

Regards

[redacted]

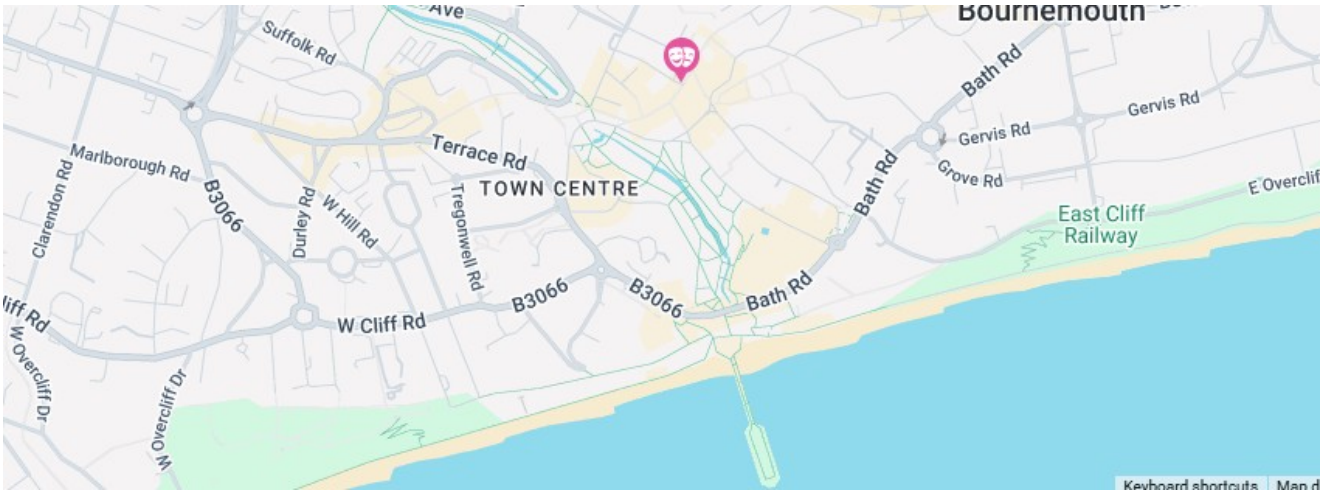
From: [redacted]@bacta.org.uk>
Sent: Friday, March 7, 2025 3:03 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Joint working visits

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

Hi [redacted]

Details of the venue for the 24th

J Holland & Sons Ltd
T/A Trident Casino Slots
49-51 Old Christchurch Road
Bournemouth
Dorset
BH1 1DT



They will be expecting us around 11.30. I was thinking maybe we could meet for a coffee about 11ish

I'll give you a bell next Friday

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 04 March 2025 14:26
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Joint working visits

Thanks John. Look forward to hearing from you.

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 4, 2025 2:23 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: Joint working visits

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Hi [redacted]

I'm with [redacted] tomorrow.
We'll try and sort something out then and get back to you Thursday/ Friday

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 11:06:02 AM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Joint working visits

Hi [redacted]

Hope you are both well?

I'm looking forward to meeting up with you both out on the 'shop floor'. If possible, I would like to carry out our premises visit(s) before the end of the month,
would either **Friday 21st** or **Monday 24th** work for you?

In terms of location, I would happy travelling along the coast to say Hampshire / Dorset or up to the Thames Vally / South London.

If planning would be easier via a Teams call then please let me know and I'll set one up.

Look forward to hearing from you.

Regards

[redacted]

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Victoria Square
Birmingham B2 4BP

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[redacted]

From: [redacted]
Sent: 28 March 2025 19:15
To: [redacted]
Subject: RE: Joint working visits

Hi [redacted]

No problem.
Give me a call sometime, other than between 11-12.30

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, March 28, 2025 4:18 PM
To: [redacted]@bacta.org.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: RE: Joint working visits

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Hi [redacted]

Are you free for a catch up or on Monday ?

[redacted]

From: [redacted]@bacta.org.uk>
Sent: 21 March 2025 10:58
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Joint working visits

Hi [redacted]

Bowl Central registered as K.T.O Limited

K.T.O. Limited

[redacted]

Head office address
Fun Central, 45-47 Westover Road,
BOURNEMOUTH, BH1 2BZ, United Kingdom

Licence summary	
Trading names	1
Domain names	0
Premises	2
Regulatory actions	0

Trading names

Name	Status
Bowl Central	Active

And the car park

Richmond Gardens Car Park
Richmond Gardens, Bournemouth BH1 1JE · 68 mi

Directions

See you Monday

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 07 March 2025 15:10
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Subject: RE: Joint working visits

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Regards

[redacted]

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Sent: Friday, March 7, 2025 3:03 PM
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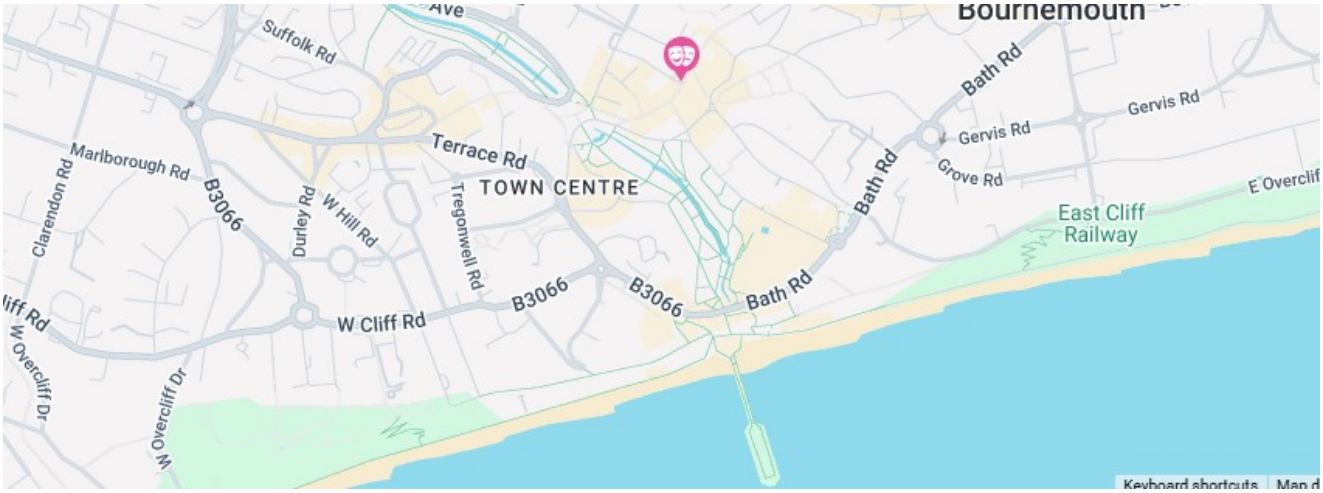

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I'll give you a bell next Friday

[redacted]

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Sent: 04 March 2025 14:26
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Joint working visits

Thanks [redacted]. Look forward to hearing from you.

Regards

[redacted]

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Sent: Tuesday, March 4, 2025 2:23 PM
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Regards

[redacted]

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[redacted]

From: [redacted]@bacta.org.uk>
Sent: 11 April 2025 18:18
To: [redacted]
Cc: [redacted]
Subject: Re: SESOG - data reporting
Attachments: Copy of BactaReport-2024-04--2025-03.xlsx; Copy of BactaReport-2025-Q1.xlsx

Follow Up Flag: Follow up
Flag Status: Completed

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[redacted],

I attach both sets of data for your info….

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, April 7, 2025 09:42
To: [redacted]@bacta.org.uk>
Subject: SESOG - data reporting

Morning [redacted]

Just a quick reminder that submissions will be due soon for the next sets of data reporting:

- Quarterly data for January to March 2025
- The annual return for 2024/25

The deadline for sending the data is 15 April.

Kind regards

GAMBLING COMMISSION

[redacted]

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[redacted]

From: [redacted]
Sent: 23 April 2025 13:10
To: [redacted]
Subject: RE: Other issues

Hi [redacted]

I'm out today in [redacted]

Will call you tomorrow.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, April 22, 2025 2:59 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Other issues

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

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]@bacta.org.uk>
Sent: 22 April 2025 14:50
To: [redacted]@gamblingcommission.gov.uk
Cc: [redacted]@bacta.org.uk>
Subject: Other issues

[redacted]

My missed call related to issues in this e mail. If you want to ring me back and discuss great.

1. I found the assessment process at Cannock most useful. The operator worked hard to get their policies and procedures up to date.

2. Could we discuss self-exclusion ordinary code 3.5.2 and MOSES self-exclusion 3.5.6 SR code. This was raised by [redacted] when he did a ghost assessment with my colleague [redacted] The encouraged use of 3.5.2 is a problem I will explain further.

3. It has been mooted that we pencil in periodical meetings between your compliance team and ourselves (Bacta MSO team). I understand this was discussed between [redacted] and [redacted]. Don't know

if this suits or best left on a one to one between ourselves. Interested in your thoughts or should I discuss with [redacted]

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

bacta
Delivering the Serious Business of Fun for 50 Years

Hi [redacted]

Hope all is well. During the roundtable hosted a few weeks ago by [redacted] and [redacted] when discussing regulatory returns, you mentioned that there was a help button on our website that didn't actually provide any help and instead directed you back to the home page. I flagged this with our Digital team in the hope of getting it fixed but I wondered if you could direct me to the issue or provide me with some more information as we are struggling to find the source of what you were referring to.

Many thanks,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk

Making gambling safer, fairer and crime free

Terrific thanks.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: Thursday, August 8, 2024 9:27 AM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Mumbles visit

Hi [redacted]

Thanks for this. Yes, confirming that the team plan to arrive at 10am and there will be 2 cars that need parking spaces, hope that works.

Thanks again for all your help with organising this, if you need anything else, just let me know.

Kind regards,
[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, August 7, 2024 4:43 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Mumbles visit

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Hi [redacted]

Thanks for this which is very helpful.

On your questions

- Could you please advise who will be attending from Mumbles? [redacted]
- Are there parking facilities on site that can be used? Yes. Please advise how many cars.

Can I also re-confirm the start time of 10am.

Best wishes.

[redacted]

From: [redacted] gamblingcommission.gov.uk>
Sent: Tuesday, August 6, 2024 12:15 PM
To: [redacted] @bacta.org.uk>; [redacted] @bacta.org.uk>
Cc: [redacted] @gamblingcommission.gov.uk>
Subject: Mumbles visit

Hi [redacted]

Hope all is well. As promised, some details for the visit next week.

Colleagues attending from the Commission will be:

- Andrew Rhodes, Chief Executive
- [redacted]
- [redacted]
- [redacted]

As with the Admiral visit, we've pulled together a couple of areas of interest to help guide the tour/discussion.

1. Market update from your perspective - what is the market like at the moment?
2. How is footfall doing?
3. How do you ensure that machines meet technical requirements?
4. How do you ensure only licensed/ permitted staff maintain/ repair machines – what staff training is provided?
5. How do you ensure stakes and prizes limits are not exceeded on non-monetary prize machines?

6. How do you ensure it is clear to consumers when a machine is skill or gaming machine (crane machines, skill vs compensated)?
7. How do you identify whether a machine is skill with prizes, cat D or cat C
8. You hold a more general AGC license but are not currently using it, what factors would make you consider using it to its full potential.

Also, a couple of questions from me:

- Could you please advise who will be attending from Mumbles?
- Are there parking facilities on site that can be used?

[redacted] will be your point of contact on the day if needed and you can reach her [redacted], I've also looped her into this email.

Any questions, just let me know.

Kind regards,
[redacted]

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Hi all,

We hope you're keeping well.

We've been busy at our end pulling together the arrangements for our first event in September!

Following your feedback at our last working group meeting, we've spent the last few weeks focused on the event logistics and developing content for the day. Now, we're ready to begin building the session focused on sharing best practice, which will be led by Operators.

We're keen to dedicate a sizeable portion of the agenda to this session, to make the most of the opportunity. We have one volunteer already for this session (thank you [redacted]) and would like to host at a couple more too.

Therefore, if you'd also like to present at this session, please may you reply to this email by no later than Friday 16th August to let us know.

Following this we'll hold another working group session, to bring you up to date with the latest plans and share the next steps to get us ready for the day.

Thank you and talk to you again soon
[redacted]

[redacted]

[redacted]

From: [redacted]gamblingcommission.gov.uk>
Sent: Thursday, June 27, 2024 4:07 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

Good afternoon [redacted]

I hope all is well with you.

Please see below a draft agenda for the Roundtable on the 17th of July.

Please could you advise of any topics you would like to add to the agenda by the end of next week.

- Welcome and introductions
- GC update
  - Update on Gambling Act Review
  - Update on Gambling Survey Great Britain (GSGB)
  - New operational points of contact
- Areas of interest raised by Bacta
- AOB

[redacted] **please reply to** [redacted], copied here, [redacted].

Many thanks
[redacted]

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[redacted]

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From: [redacted]

[redacted]bacta.org.uk>
Sent: Thursday, June 13, 2024 4:38 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

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Will do – kind regards.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Thursday, June 13, 2024 3:43 PM
To: [redacted]@bacta.org.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

Hi [redacted]

If possible, could you please let me have any items you would like to add to the agenda by the end of this month?

Thanks
[redacted]

[redacted]
Sent: Thursday, June 13, 2024 3:21 PM
To: [redacted]@bacta.org.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

That's excellent [redacted] Good timing today to be able to ask members too.

I'll book you all into reception.

Best wishes
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, June 13, 2024 3:18 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

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Hi [redacted]

Yes hopefully – apart from [redacted]

We had our Board today so managed to speak to the members.

Kind regards.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Thursday, June 13, 2024 3:14 PM
To: [redacted]@bacta.org.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

Good afternoon [redacted]

Thank you for confirming. Will you all be attending in person?

Best wishes
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, June 13, 2024 3:12 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

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Hi [redacted]

Just to confirm our attendees at the meeting on 17 July 2024 at 3pm:

- [redacted]
- [redacted]
- [redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]

Kind regards.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, June 10, 2024 5:12 PM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

Thanks [redacted]

I'll send you the diary invite for onward cascade to your members. For administrative purposes, it would be appreciated if nearer the time you can advise who will be attending in person and who will join remotely.

Many thanks
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, June 10, 2024 4:57 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: BACTA/Gambling Commission Roundtable

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Hi [redacted]

Yes - let's go for the 17th July at 3pm in Birmingham.

I will confirm our line up at a later stage.

Thanks and best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, June 10, 2024 4:31 PM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: BACTA/Gambling Commission Roundtable

Hi [redacted]

I've checked with Andrew's office and unfortunately due to diary constraints and leave commitments, I'm unable to offer any alternative dates in July. Are you content to go ahead with the 17th at 3pm?

Best wishes
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, June 10, 2024 3:47 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: BACTA/Gambling Commission Roundtable

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Hi [redacted]

Thanks for this.

We are leaning towards the 17th July slot but our [redacted] is unavailable that week. Is there any flexibility on dates? If not, we will take the 17th slot at 3pm.

Kind regards.

[redacted]

[redacted]

[redacted]

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Mobile: [redacted]

Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 10 June 2024 13:16
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted] @gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: BACTA/Gambling Commission Roundtable

Dear [redacted]

I have been asked on behalf of the CEO office to explore dates for the next BACTA/Gambling Commission Roundtable with Andrew Rhodes, CEO [redacted] The previous Roundtable was held in May 2023, and I have attached the meeting note for your reference.

Please could I ask if your office could canvass your members availability for the next roundtable on either of the following dates:

Monday 15th July – anytime between 10 & 2pm or

Wednesday 17th July after 3pm

The meetings usually last no longer than 90 minutes and can be held at our offices in Birmingham in person, hybrid or remote. To note Andrew could only join remotely on the 15th.

I look forward to hearing from you.

Best wishes

[redacted]

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[redacted]

[redacted]

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Thanks [redacted]

I agree it would still be helpful to meet. Hope you have a good weekend too.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, August 9, 2024 9:22 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Meeting next week

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Morning [redacted]

I hope you are well.

[redacted] has informed me that he now cannot make our meeting next Tuesday. I have already booked my travel arrangements. I think it would be good for us to still meet and I can give you an update on our development plans and time scales.

I trust you will have a good weekend and I look forward to seeing you next week.

Best wishes

[redacted]

[redacted]

[redacted]

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29 30 Ely Place
London
EC1N 6TD
Tel: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

Hi [redacted]

That is fantastic, 9.30am on the 3rd September will be good.

In attendance

[redacted]

I will chase this week for questions.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, August 13, 2024 9:39 AM
To: [redacted]@bacta.org.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>
Subject: RE: Training for Bacta Membership support officers.

Good Morning,
3rd of September is perfect.
Can you confirm what start time would be good, 9.00 / 9.30 as a suggestion and who will be coming and I can get them registered with reception to gain access to the building

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From: [redacted]@bacta.org.uk>
Sent: Monday, August 12, 2024 2:03 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: RE: Training for Bacta Membership support officers.

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Hi,

If we can confirm which date works, I will go back and get some specific questions.

Many thanks

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, August 12, 2024 1:01 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: RE: Training for Bacta Membership support officers.

Hi,

[redacted], but happy to provide some info in advance if the dates don't work, especially if there are some typical questions, issues in advance as [redacted] says.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, August 12, 2024 12:57 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Training for Bacta Membership support officers.

Afternoon [redacted]
Will get back to you with regards to the dates but also was expecting a list of common questions to ensure we covered all that you required, or are you happy for it to be an overall general approach?
have coped in [redacted] as he will be working on this with me

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From: [redacted]@bacta.org.uk>
Sent: Monday, August 12, 2024 12:34 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Training for Bacta Membership support officers.

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Hi [redacted]

Sorry I didn't get back to you last week.

Could we go for Tuesday the 3rd September or Thursday the 12th September. I believe you thought it would be a half day, as such can we go for an morning session.

If possible, Tuesday the 3rd would be our preference.

Many thanks once again for organising this.

Speak soon.

[redacted]

[redacted]

[redacted]

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Outlook

Photos

From [redacted]@bacta.org.uk>
Date Wed 8/14/2024 4:42 PM
To [redacted]@gamblingcommission.gov.uk>

2 attachments (8 MB)
processed 60EEFAD7 668D 4E71 BF8A BB7F512D756C.jpeg; processed DFF3F1ED AFD6 491A 8710 333C4E2B66D7.jpeg;

You don't often get email [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

Great to meet you today. Hope you found the visit informative.

Attached the pictures [redacted] asked for.

Enjoy the rest of your Southampton visit.

Best wishes.

[redacted]

[redacted]

Hi [redacted]

Sorry it's taken so long to get back with questions please find comments below from MSO's

1. Please bear in mind that as MSOs do not have access to E services. We are privy to LCCP ordinary & SR codes. We have access to printed or on- line versions of regulatory returns.
2. Members contact us about e Services submissions and most enquiries relate to Reg returns.
3. It would be helpful to have a whistle stop tour of the e Services site for address management, invoices & payments, Key events, LCCP notifications, Reg returns and variation applications etc.
4. An explanation of recent regulatory return changes would be helpful.
5. A run through Reg returns in some detail would be helpful. Examples of recent enquiries include submission of the categories around Prize Game calculations and submission of RET payments.
6. We may wish to consider an understanding of Bingo Reg returns as well as AGCs.
7. Can the trainers explain the functionality of the help boxes in reg returns. Each help box pressed appears to return users to the general guidance site not the specific area of business. Are the help boxes likely to be amended to become more helpful.
8. For MSOs to provide best guidance to our members can we have access to some form of a dummy account. As E services evolves and amendments are made we can try and keep track as well….
9. In Reg returns AGC Operational information there is still some confusion by those submitting in terms of below. Why are MOSES included in one but not in the other.

    - Self- exclusions…… Submission of Nos for own scheme (By operator) but not submissions for MOSES scheme (Nos submitted by scheme operator)
    - Breaches …….. Submission of breaches for own scheme and MOSES scheme.

I look forward to seeing you on Tuesday.

Best wishes

[redacted]

[redacted]

Fab thanks!

And many thanks for having us, it was lovely to meet you all in person.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, August 16, 2024 8:39 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Visit - Mumbles

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Sorry - we have two [redacted]

It is [redacted]

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, August 16, 2024 8:36:57 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Visit - Mumbles

Sorry [redacted] I meant the Man who took the picture?

Thanks
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, August 16, 2024 8:36 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Visit - Mumbles

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Hi [redacted]

It is [redacted].

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, August 16, 2024 8:34:50 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Visit - Mumbles

Hi [redacted]

Many thanks for this.

Please could you let me know [redacted] from Bacta's full name for my records please?

Thanks again

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[redacted]

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[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, August 15, 2024 5:08 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Visit - Mumbles

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Hi [redacted]

Lovely to see you today.

Here is a picture from your visit to Mumbles Pier. We were lucky the sun was peeking out.

Best wishes.

[redacted]

[redacted]

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From: [redacted]
To:
Cc:
Subject: Re: Questionnaire
Date: 28 August 2024 18:56:11

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[redacted]

It seems fairly straightforward. Thanks for sharing…

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Wednesday, August 28, 2024 4:07:51 PM
To: [redacted]@bacta.org.uk>; [redacted]bacta.org.uk>
Cc: [redacted]gamblingcommission.gov.uk>
Subject: Questionnaire

Hi [redacted]

Please find attached a PDF document showing the question sets for the Questionnaire we have told you about.

I'm sorry it's later than expected but we've had a few issues our end to iron out.

Subject to any IT issues this should be sent out to about 250 licensees tomorrow or Friday although not all will be BACTA members.

It is an official request with a deadline of Friday 6 September and contains about 50 questions with Yes/No answers. I completed it myself and it only took about 15 minutes to complete. There is a link to the 'Survey' on the e-mail and results will come direct to us.

Gambling Commission Compliance Questionnaire - Adult Gaming Centres (AGCs)

Personal Details Q's numbers 1-3

Exterior				
Number	**Question**	**Requirement**	**Licensing objective**	**Answer options**
4	Do you display prominent signs stating that under-18's are not permitted, and that no alcohol may be brought onto the premises	The GA 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007	Protecting Children & Vulnerable persons.	Yes/No
5	Do you check that all window displays/promotional material complies with CAP rules on advertising and the Gambling Industry Code for Socially Responsible Advertising	LCCP - SR code 5.1.6	Fair & Open	Yes/No
6	Does the presentation of your premises make it clear that it is an arcade (AGC), is age restricted and not appealing to children or youth culture.	SRCP 3.2.3 (4)	Fair & Open/ Protecting Children & Vulnerable persons.	Yes/ No

Interior				
7	Have you provided information to customers about how to gamble responsibly and where they can access help for problem gambling	SRCP 3.3.1	Protecting Children & Vulnerable persons.	Yes/No
8	Is there direct access between the AGC and any other gambling premises.	The GA 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007		Yes/No
9	Do you have more than one AGC inside a building	The GA 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007		Yes/ No
10	If yes to 6 – does each premises have its own entrance, staff, logs etc	The GA 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007		Yes/ No/ Not applicable
11	Have you made sure that you know the number of Category B gaming machines you	Gambling Act s172 as amended by The Gaming Machines in Adult	Protecting Children & Vulnerable persons.	Yes/No

	should have within your premises	Gaming Centres and Bingo Premises Order 2011		
12	Have you checked to ensure that you have not exceeded this number	Gambling Act 2005 s.172 as amended by the Gaming Machines in Adult Gaming Centres and Bingo Premises Order 2011	Protecting Children & Vulnerable persons.	Yes/No
13	Have your staff been trained in the last 12 months to ensure that they know how to supervise gaming machines and monitor customer behaviour	SRCP 3.4.1	Protecting Children & Vulnerable persons.	Yes/No
14	Do you check that your staff are monitoring the gaming machines and customer behaviour appropriately	SRCP 3.4.1 & Personal licence conditions 1(1) (where applicable)	Protecting Children & Vulnerable persons.	Yes/No
15	If you have ATM machines within your business, are they situated away from Gaming	Schedule 3 The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007	Protecting Children & Vulnerable persons.	Yes/No

	machines and is SG material placed nearby.			
	Anti-money laundering & Proceeds of Crime			
16	Have managers/ senior staff received training in relation to anti-money laundering obligations	LC 12.1.1	Keeping Gambling Crime Free	Yes/No
17	Do you have written processes for anti- money laundering so that your staff can follow	LC 12.1.1	Keeping Gambling Crime Free	Yes/No
18	Do you have records to show that your staff have been trained	LC 12.1.1	Keeping Gambling Crime Free	Yes/No
19	Have your staff been told what to do if they identify suspicious activity	LC 12.1.1	Keeping Gambling Crime Free	Yes/No
20	Have you reviewed your anti-money laundering risk assessment in the last 12 months	LC 12.1.1	Keeping Gambling Crime Free	Yes/No

21	If you have them, do you monitor the use of Ticket in/Ticket Out (TITO) machines?	LC 12.1.1	Keeping Gambling Crime Free	Yes/No/Not applicable
Local Area Risk Assessments				
22	Do you have a local area risk assessment (LARA) for your premises?	SRCP 10.1.1	Protecting Children & Vulnerable persons.	Yes/No
23	Have you made sure any risks identified in the LARA have been mitigated by putting additional measures in place	SRCP 10.1.1	Protecting Children & Vulnerable persons.	Yes/No
Monitoring and Preventing Underage Gambling				
24	Do you have written policies and procedures to prevent underage access the premises	SRCP 3.2.3	Protecting Children & Vulnerable persons.	Yes/No
25	Do you have written written policies and procedures to prevent underage gambling on the premises	SRCP 3.2.3	Protecting Children & Vulnerable persons.	Yes/No

26	Have all your staff been trained in the subject of preventing under age gambling in the last 12 months	SRCP 3.2.3	Protecting Children & Vulnerable persons.	Yes/No
27	Do you have a think 25 policy in place	SRCP 3.2.3 & OC 3.2.4	Protecting Children & Vulnerable persons.	Yes/No
28	Do you ensure no one under the age of 18 is involved in the provision of gambling activities	SRCP 3.2.3 & OC 3.2.4	Protecting Children & Vulnerable persons.	Yes/No
29	Are you involved in a test purchasing programmed	New LCCP requirement SRCP 3.2.3 (8)	Protecting Children & Vulnerable persons.	Yes/No
30	Do you know the rules around the return of stakes when a child or young person has been identified as gambling.	SRCP 3.2.3 (6)	Protecting Children & Vulnerable persons.	Yes/No
Customer Interaction.				
31	Do you have written policies and procedures around how and when to conduct a safer gambling customer interaction	SRCP 3.4.1	Protecting Children & Vulnerable persons.	Yes/No

32	Do you have a process for recording the customer interaction	SRCP 3.4.1	Protecting Children & Vulnerable persons.	Yes/No
33	Are all your staff trained to conduct and record customer interactions	SRCP 3.4.1	Protecting Children & Vulnerable persons.	Yes/No
34	Have you evaluated the effectiveness of your customer interaction process in the last 12 months	SRCP 3.4.1	Protecting Children & Vulnerable persons.	Yes/No
Self-exclusion				
35	Do you have a written process for self-exclusion	SR Code 3.5.1 and 3.5.6	Protecting Children & Vulnerable persons.	Yes/No
36	Are all staff trained to understand and follow the self-exclusion process.	SR Code 3.5.1 and 3.5.6	Protecting Children & Vulnerable persons.	Yes/No
37	Do you have a process in place to identify those that have self-excluded	SR Code 3.5.1 and 3.5.6	Protecting Children & Vulnerable persons.	Yes/No

38	Do you have a written process for those that return to gambling from self- exclusion	SR Code 3.5.1 and 3.5.6	Protecting Children & Vulnerable persons.	Yes/No
39	Do you have a process for checking the multi operator self-exclusion schemes register.	SR Code 3.5.6	Protecting Children & Vulnerable persons.	Yes/No
Complaints and Disputes				
40	Do you have a written process for customer complaints and disputes	SRCP 6.1.1	Fair & Open	Yes/No
41	Have staff received training in relation to these processes	SRCP 6.1.1	Fair & Open	Yes/No
42	Do you have an ADR	SRCP 6.1.1	Fair & Open	Yes/No
43	Do you have a record of complaints and disputes	SRCP 6.1.1	Fair & Open	Yes/No
44	In the last 12 months have you followed any decision made by an ADR	SRCP 6.1.1	Fair & Open	Yes/No/Not applicable

Staff training				
45	Do you have records for all staff training	3.2.3 & 3.2.4	All LO's	Yes/No
Management checks				
46	Do you have regular checks by senior staff to ensure all processes are being followed	3.2.3 & 3.2.4	All LO's	Yes/No
47	Are you aware of what needs to be reported to the Gambling Commission for regulatory returns	LC 15.3.1	All LO's	Yes/No
48	Are you aware of what needs to be reported to the Gambling Commission for key events	LC 15.2.1	All LO's	Yes/No
49	Are you up to date with regulatory returns and key event reporting.	LC 15.3.1	All LO's	Yes/No

Gaming Machines				
50	Are all gaming machines supplied by the holder of a Gambling Commission licence	GA05 s.243	All LO's	Yes/No
51	Are all repairs/ upgrades conducted by individuals with the appropriate licences	GA05 s.243	All LO's	Yes/No
52	Are visual checks conducted for the machines to ensure there is sufficient RTP and safer gambling information on the machines	Gambling Act 2005 s.240	All LO's	Yes/No
53	Do the machines display the appropriate machine category	Gambling Act 2005 s.240 and The Gaming Machine (Circumstances of Use) Regulations 2007	All LO's	Yes/No
54	Are all machines tested to ensure they meet machine technical standards	LC 2.3.1	All LO's	Yes/No

Hello [redacted]

Thank you for your reply.

The operators have been picked mainly at random, however we have attempted to try to get a broad mix of different sizes of operator as well as with differing activities on their licences.

Kind regards,

[redacted]

GAMBLING COMMISSION

Making gambling safer, fairer and crime free

Victoria Square House
Victoria Square
Birmingham B2 4BP

Phone: [redacted]
[redacted]@gamblingcommission.gov.uk
www.gamblingcommission.gov.uk

Great Place To Work. Certified NOV 2023-NOV 2024 UK

From: [redacted]@bacta.org.uk>
Sent: Friday, August 30, 2024 10:05 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Gambling Commission - Single Point of Contact Pilot

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important
CAUTION: This email is from an external source - be careful of attachments and links

[redacted]

I am a [redacted] with bacta and I was sent the below e mail by one of my members.

Can you tell me how many AGC operators are likely to be invited into this tranche of the pilot. Is this latest expansion based on size of the business and likely volume of calls or is it a random offering to operators?

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, September 4, 2024 12:14 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Training

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Hi [redacted]

I just wanted to drop you a note and thank you for yours and [redacted] time yesterday it was very much appreciated.

I know that Bacta's Membership Support Officers and I got a lot from the meeting and training.

If there is anything that we can do for you please do not hesitate to get in contact.

If your colleague from the comms team that took the photograph could send me a copy it would be very much appreciated.

Very best wishes

Many thanks [redacted] Best [redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, September 5, 2024 4:17 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Re Age verification and test purchasing - non remote

You don't often get email from [redacted]bacta.org.uk. Learn why this is important
CAUTION: This email is from an external source - be careful of attachments and links

Hi [redacted]

I have had your email below directed to me.

The Age Verification service to members currently falls under my remit along with the Membership support officers.

Please let me know if there is anything I can do to help.

Best wishes

[redacted]

[redacted]

[redacted]

bacta
Delivering the Serious Business of Fun for 50 Years

29-30 Ely Place
London
EC1N 6TD
Tel [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 04 September 2024 07:11
To: [redacted]@bacta.org.uk>
Subject: Re Age verification and test purchasing - non remote

Good morning,

can you please let me know who currently is responsible for this issue. Thanks in anticipation.

Regards

[redacted]
Gambling Commission
Victoria Square House
Victoria Square
Birmingham
B2 4BP
Tel: [redacted]

Mob: [redacted]
www.gamblingcommission.gov.uk

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Am glad you found it useful, I will have a chat with our digital team who 'own' the screenshots and see whether we can release them to you.
Any questions going forward please do not hesitate to reach out – your insight into the problems that users had was very useful for us

GAMBLING COMMISSION
[redacted]
Phone number: [redacted]
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]@bacta.org.uk>
Sent: Thursday, September 5, 2024 4:19 PM
To: [redacted]@gamblingcommission.gov.uk>
[redacted]@gamblingcommission.gov.uk>
Subject: RE: Pictures

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

Hi [redacted]

Many thanks for the pictures and your time and patience on Tuesday. I and the team found it very helpful.

Very Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 05 September 2024 16:17
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Pictures

Good Afternoon [redacted]

Please see attached the photos from the other day.

Hope you all got back safely.

Regards

From: [redacted]
To:
Subject: RE: Questionnaire
Date: 09 September 2024 15:46:11

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

[redacted]

A couple of operators contacted me stating that they pressed save and they did not receive any confirmation that the questionnaire had been sent. Can you confirm that this is the case....

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 28 August 2024 16:08
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Questionnaire

Hi [redacted]

Please find attached a PDF document showing the question sets for the Questionnaire we have told you about.

I'm sorry it's later than expected but we've had a few issues our end to iron out.

Subject to any IT issues this should be sent out to about 250 licensees tomorrow or Friday although not all will be BACTA members.

It is an official request with a deadline of Friday 6 September and contains about 50 questions with Yes/No answers. I completed it myself and it only took about 15 minutes to complete. There is a link to the 'Survey' on the e-mail and results will come direct to us. The PDF is only a reference copy and each operator will also get a copy of it.

I hope this makes sense. Any questions shout up.

Kind regards.

[redacted]

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From: [redacted]
Subject: RE: EAG 2025
Date: 12 September 2024 11:23:15

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Hi [redacted]

Thanks – I'll double check and revert.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 12 September 2024 11:14
To: [redacted]@bacta.org.uk>
Subject: RE: EAG 2025

Hi [redacted]

Good to see you on Tuesday and chat about recent engagement. On the below, I'll put this back round with colleagues. Can you just send me some brief info on the positioning of the Safer Gambling Hub and so on? As I said on Tuesday, colleagues who staffed our stand a year or so ago (before you were on the scene) weren't overly impressed with the positioning, so whilst we're pleased to see your ongoing commitment to a Safer Gambling Hub, I think there may be some reluctance to take part again in the same way as a result.

Thanks,

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, September 11, 2024 8:51 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: EAG 2025

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

I am writing regarding the EAG Expo 2025 being held on 14-16 January 2025 at the Excel in London. See full details: EAG Expo Welcome Page

As you know, in previous years we have been pleased to have the GC set up a stand as part of the Safer Gambling Hub.

We would be delighted to host you attend again.

Let me know if that might be possible and, if so, what days you may wish to attend.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

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From: [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, June 24, 2024 3:56 PM
To: [redacted]@bacta.org.uk
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Invitation - Safer Gambling Hub - EAG Expo 2025

Dear [redacted]

Thank you for your email and invitation to next year's event. We would very much like to attend the event and look forward to it.

I look forward to receiving further information about the event in due course. Should you have any questions or require a contact please do not hesitate to contact me directly.

Kind regards

[redacted]

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Monday, June 17, 2024 4:13 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Invitation - Safer Gambling Hub - EAG Expo 2025

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Dear Gambling Commission,

I would like to express Bacta's appreciation for your attendance at previous EAG Expos.

Your participation in the Safer Gambling Hub helped to promote safer gambling practices and increase awareness in our industry of the valuable work your organisation does.

We would be delighted to have your organisation participate once more at the 2025 EAG Expo. This will take place at London Excel on the **14th – 16th January 2025.** Please be aware the show is expanding this year and in addition to the existing Expo will be a Casino Show.

We have reflected on the format of the Safer Gambling Hub and in 2025 and we will be dividing the area into sections

- Exhibition stands which can be booked by organisations in two hour slots on each of the days of the Expo.
- A more socialable area where you can meet people or hold small gatherings. This area can also be booked out at specific times eg for a small lunchtime meeting.

As in previous years no charges will be made for any bookings. The aim is to provide a showcase for your organisation to our wider sector.

We hope this new arrangement will continue to give you the chance to engage with the many attendees at the Expo.

If you would like to express an interest in booking a stand or the more social area, please let me know the times and dates you are seeking.

We look forward to welcoming you back to the EAG Expo in January and to working together towards responsible and safer gambling.

If you have any questions about the new arrangements, please get in touch.

Warm regards.

[redacted]

From: [redacted]
To: [redacted]
Subject: FW: Re Age verification and test purchasing - non remote
Date: 30 September 2024 12:46:00

Hello [redacted]

Any thoughts please?

[redacted]

From: [redacted]
Sent: Friday, September 6, 2024 1:21 PM
To: [redacted]@bacta.org.uk>
Subject: RE: Re Age verification and test purchasing - non remote

Hi [redacted]

The Commission thought it would be timely to remind relevant Trade Associations in regard to the AV testing processes for the NR sector. You are no doubt aware the smaller (Cat A and B operators) are now required to conduct AV TP as well as submit the results themselves, not via their TA. Should you not have already done so (which you may well have done) it might be timely to give them a nudge. The E Bulletin has already issued a number of reminders. The following was published on 1st May 2024. Summer 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response - Summary - Strengthening age verification in premises (gamblingcommission.gov.uk)

Secondly there is an ordinary code provision regarding under 25s which affects all operators irrespective of size. This is also covered in the E Bulletin.

More generally we would be interested to hear if there has been any notable technological innovations or other changes that are being adopted within your sector(s) in regard to AV. We would be interested to hear of any developments.

Should you have any questions please drop me a line

Best [redacted]

[redacted]

You don't often get email from [redacted]bacta.org.uk. Learn why this is important

[redacted]

From: [redacted]
To:
Cc:
Subject: RE: Reg Returns
Date: 04 October 2024 14:04:00
Attachments: image002.png
image003.png
image004.png

Hi [redacted]

Ill sort a call with [redacted]

Regards

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]@bacta.org.uk>
Sent: Friday, October 4, 2024 12:36 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Cc: [redacted]
Subject: Reg Returns

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Hello [redacted]

Re: Regulatory Returns

I believe I spoke with you earlier in the week. Would it be possible for you or one of the team to contact a Bacta Member from the Isle-of-White, who is having difficulty in completing some of the areas on the return.

[redacted]

I know you are busy, many thanks for your time

Regards

From: [redacted]
To: [redacted]
Subject: RE: Reg Returns
Date: 07 October 2024 11:02:35
Attachments: image001.png

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Thanks [redacted]

Regards

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 07 October 2024 09:19
To: [redacted]@bacta.org.uk>; [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Reg Returns

Hi [redacted]

I hope you are well.

Just for future reference, the [redacted] in Compliance at the Commission you need to speak to about reg returns is [redacted] (CC'd into this email). Do not worry, there is a few [redacted] in the Compliance Team!!

I forwarded your email to [redacted] and believe he has progressed your enquiry.

Kind regards
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, October 4, 2024 12:36 PM
To: [redacted]gamblingcommission.gov.uk>; [redacted]

From: [redacted]
Subject: Re: Membership
Date: 15 October 2024 18:01:09

Thanks [redacted]

Sorry I didn't get chance to call you.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, October 15, 2024 4:59:07 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Membership

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[redacted]
I have referred this enquiry internally within bacta. It will be discussed at our National Council meeting this week on Thurs 17th. As soon as a decision is made I will get back to you...

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, October 11, 2024 12:20:29 PM
To: [redacted]@bacta.org.uk>
Subject: RE: Membership

Ok [redacted]

Thanks, if I can't make it on Monday, I'll call on Tuesday.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, October 11, 2024 12:14 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Membership

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[redacted]

I am about later on Monday and any time Tuesday to take a call. [redacted]

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 11 October 2024 12:00
To: [redacted]@bacta.org.uk>
Subject: RE: Membership

I [redacted]

I don't anticipate there being too much work for you as the failings seem to suggest that most operators (who we have risk assessed) cannot be in BACTA as we know the answers returned are inconsistent with your policies and procedures i.e. No MOSES in place.

I have a meeting about this on Monday afternoon so will call you next week to discuss if that's ok?

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, October 11, 2024 11:33 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Membership

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[redacted]

Just a few points.....

1. As you will be aware I will have to share this request with other bacta staff to get the go ahead but I wouldn't think there will be a problem.
2. What is the timescale for completion of your analysis?
3. In terms of risk- based visits to address any failings when do you think that process

will start?

4. If bacta is looking to address their members is that an assessment by yourselves about who requires a visit or is this a piece of work based on general themes and improvement.
5. Is there a template you would wish us to use?
6. Just trying to work out how much work is involved here and our MSO capacity.

Give me a bell when you get chance it will be easier to have a chat....

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 10 October 2024 09:44
To: [redacted]@bacta.org.uk>
Subject: Membership

Hi [redacted]

I hope you are well.

We are analysing the results of the questionnaire we sent out recently to all AGC operators. Our main problem is that we are unable to establish from our data which operators are BACTA members and which aren't.

Is it possible for you to supply us with a copy of your membership list so that we can separate the BACTA and non-BACTA members?

The intention is to leave you to address any failings from the BACTA list and we will take up the non-compliance of the other operators.

Many thanks.

[redacted]
GAMBLING
COMMISSION
[redacted]
www.gamblingcommission.gov.uk
Confidential Call line [redacted]

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Think of the environment before printing out this message

From: [redacted]
To:
Subject: RE: Coinslot
Date: 16 October 2024 13:01:00

Hi [redacted]

I hope you are well.

Thanks for reaching out and apologies for the delay in responding – I was waiting until I had emailed firstly about plans to hold catch-up Teams meetings with the trade bodies.

I must confess I was a little surprised by the two recent articles in Coinslot. Whilst certainly not wanting to make a big deal of things (I could have reached out to relevant parties directly but didn't), I did consider whether reference to the proposals within trade press was helpful at this time and in the spirit of pre-consultation engagement. We can perhaps chat through when we speak in a couple of weeks' time.

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, October 9, 2024 9:22 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Coinslot

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Dear [redacted]

I wanted to get in touch about an article in Coinslot last week. The article "Bacta Prepared to go 'all the way'" (page1) has mis-reported the comments of our President and we have contacted Coinslot as a result.

We have our concerns about the latest batch Technical Standards proposals, but we are grateful for the continuing engagement with you and your team on the industry proposals we submitted and we welcome the steps you have taken to adopt a number of these.

Looking forward to catching-up soon.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]

From: [redacted]
To: [redacted]
Subject: RE: Re Age verification and test purchasing - non remote
Date: 17 October 2024 05:33:00

Hello [redacted]

I was wondering if you had any observations regarding the mail I sent. Thanks. [redacted]

From: [redacted]bacta.org.uk>
Sent: Thursday, September 5, 2024 4:17 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Re Age verification and test purchasing - non remote

> You don't often get email from [redacted]acta.org.uk. Learn why this is important

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Hi [redacted]

I have had your email below directed to me.

The Age Verification service to members currently falls under my remit along with the Membership support officers.

Please let me know if there is anything I can do to help.

Best wishes

[redacted]

[redacted]

[redacted]

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London
EC1N 6TD

[redacted]

Outlook

Bacta Convention

From [redacted]@bacta.org.uk>
Date Fri 11/1/2024 4:00 PM
To [redacted]@gamblingcommission.gov.uk>
Cc [redacted]@bacta.org.uk>

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

I hope you have had a good week.

I am just reaching out ahead of Bacta's Convention later this month, which [redacted] kindly agreed to speak at, to enquire if he had any slides that he would like to be added to the deck?

The current slot for [redacted] with the possibility to extend should he wish. We would also be very grateful if he could take a few questions from the audience and those streaming in from elsewhere.

If you have any questions at this stage, do let me know.

Best wishes,

[redacted]

[redacted]

Email: [redacted]@bacta.org.uk
Mobile: [redacted]

bacta
Delivering the Serious Business of Fun for 50 Years
29-30 Ely Place
London EC1N 6TD

From: [redacted]
To: [redacted]
Subject: Re: Bacta SES development.
Date: 04 November 2024 08:46:54

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Hi [redacted]

Can we go for 3.00 pm on Thursday.

Best wishes

[redacted]

> On 31 Oct 2024, at 17:20, [redacted]@gamblingcommission.gov.uk> wrote:
>
> Hi [redacted]
>
> [redacted] Next week I could do Monday or Friday after 13:00 or Thursday after 15:00. Let me know if any of those times work and I'll send you an invite.
>
> Have a good long weekend
>
> [redacted]
>
> -----Original Message-----
> From: [redacted]@bacta.org.uk>
> Sent: Thursday, October 31, 2024 5:08 PM
> To: [redacted]@gamblingcommission.gov.uk>
> Subject: Re: Bacta SES development.
>
> CAUTION: This email is from an external source - be careful of attachments and links
>
>
> Hi [redacted]
>
> [redacted]. Are you free mid morning on Tuesday or Thursday say 11.00am?
>
> Best wishes
>
> [redacted]
>
> Sent from my iPhone
>
>> On 31 Oct 2024, at 16:03, [redacted]@gamblingcommission.gov.uk> wrote:
>>
>> Sorry [redacted] I've got back to back meetings on the 6th.
>>
>> I'm pretty meeting free tomorrow though. If you have any availability for a call tomorrow let me know and I'll send you an invite.
>>
>> Kind regards
>>
>> [redacted]
>>
>> -----Original Message-----

>> From: [redacted]bacta.org.uk>
>> Sent: Thursday, October 31, 2024 3:43 PM
>> To: [redacted]@gamblingcommission.gov.uk>
>> Subject: Bacta SES development.
>>
>> CAUTION: This email is from an external source - be careful of attachments and links
>>
>>
>> Hi [redacted]
>>
>> I hope you are well.
>>
>> I have a catch up meeting with your enforcement team at 10.00am on Wednesday the 6th November at your offices. If you are available it would be good to have a quick meeting and I can bring you up to speed on the situation regarding the development of the new Bacta Self Exclusion System
>>
>> Best wishes
>>
>> [redacted]
>>
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> This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

From: [redacted]
To: [redacted]
Subject: Re: EAG Safer Gambling Hub
Date: 04 November 2024 11:20:29
Attachments: Outlook-5pexpfqh

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Hi [redacted]

That is great. We will be in touch soon.

Best wishes,

[redacted]

[redacted]

Email: [redacted]@bacta.org.uk
Mobile: 0[redacted]

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29-30 Ely Place
London EC1N 6TD

From: [redacted]@gamblingcommission.gov.uk>
Sent: 24 October 2024 3:18 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: RE: EAG Safer Gambling Hub

Thanks, [redacted] for copying me into this email.

Hi [redacted]
Nice to be introduced to you. My engagement in June was with [redacted] and the email detailed below was sent to me, to which I responded that we would like to attend. Please do not hesitate to contact me should you have any queries. I look forward to receiving further information about the event.

Kind regards

[redacted]

.....

Dear Gambling Commission,

I would like to express Bacta's appreciation for your attendance at previous EAG Expos.

Your participation in the Safer Gambling Hub helped to promote safer gambling practices and increase awareness in our industry of the valuable work your organisation does.

We would be delighted to have your organisation participate once more at the 2025 EAG Expo. This will take place at London Excel on the **14th – 16th January 2025.** Please be aware the show is expanding this year and in addition to the existing Expo will be a Casino Show.

We have reflected on the format of the Safer Gambling Hub and in 2025 and we will be dividing the area into sections

- Exhibition stands which can be booked by organisations in two hour slots on each of the days of the Expo.
- A more socialable area where you can meet people or hold small gatherings. This area can also be booked out at specific times eg for a small lunchtime meeting.

As in previous years no charges will be made for any bookings. The aim is to provide a showcase for your organisation to our wider sector.

We hope this new arrangement will continue to give you the chance to engage with the many attendees at the Expo.

If you would like to express an interest in booking a stand or the more social area, please let me know the times and dates you are seeking.

We look forward to welcoming you back to the EAG Expo in January and to working together towards responsible and safer gambling.

If you have any questions about the new arrangements, please get in touch.

Warm regards.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Thursday, October 24, 2024 1:32 PM

To: [redacted]@bacta.org.uk>
Cc: [redacted]gamblingcommission.gov.uk>
Subject: RE: EAG Safer Gambling Hub

Hi [redacted]

Thanks for this. Actually, I think I might have been slightly over complicating matters when I spoke to [redacted] My understanding now is Compliance colleagues have agreed back in June(?) to attend and staff a stall/pop-up etc and generally be available to meet attendees. We can now nail down the details of that over email if you like and it is of course very welcome that you want to build our feedback into planning for next year's event.

On that basis I'm copying in [redacted] who is one of our Operational Points of Contact with Bacta and who, working in Compliance will be looking at how we staff EAG this coming year. Also copying [redacted] from my team who can advise if necessary.

Thanks,

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, October 24, 2024 10:17 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: EAG Safer Gambling Hub

> You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

I hope you are having a good week.

I am touching base regarding the Safer Gambling Hub at the EAG 14-16 of January. I believe my colleague, [redacted], reached out in September on this.

We are very keen to have the Gambling Commission have a strong presence there and I understand that there may be some hesitation around the Commission getting involved after some frustrations with the positioning of last years stand. I am happy from our end to do whatever we can to ensure that this is rectified.

It has been decided that there will be a revised format for the Social Responsibility Hub this year, with each charity and organisation offered an unmanned pop-up and literature rack to be present for the duration of the event. There will also be four stalls to be manned by charities on a rotating schedule, as well as a meeting lounge in the

centre of the Hub for organisations to hold group sessions.

We would be happy for the Gambling Commission to be there for all or some of the event, whatever works best for yourselves. Please do let me know anything we can do to help with your participation in the event.

Best wishes,

[redacted]

[redacted]

Email: [redacted]@bacta.org.uk
Mobile: [redacted]

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London EC1N 6TD

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, June 10, 2024 9:11 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: BACTA Convention 2024 - Invitation to Speak and Save The Date - Thursday 27 November 2024

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

Fabulous, thanks!

Best wishes.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 10 June 2024 09:10
To: [redacted]@bacta.org.uk>
Subject: RE: BACTA Convention 2024 - Invitation to Speak and Save The Date - Thursday 27 November 2024

Hi [redacted]

No problem, [redacted] is also available on the 28th November, so I'll update the diary this end.

Best wishes
[redacted]

From: [redacted]@bacta.org.uk>

Sent: Monday, June 10, 2024 9:07 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: BACTA Convention 2024 - Invitation to Speak and Save The Date - Thursday 27 November 2024

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

Hi [redacted]

Thanks but I've blundered!

The Convention is on Thursday 28 November (not 27th).

My apologies.

Kind regards.

[redacted]

From: [redacted]gamblingcommission.gov.uk>
Sent: 10 June 2024 08:56
To: [redacted]@bacta.org.uk>
Subject: RE: BACTA Convention 2024 - Invitation to Speak and Save The Date - Thursday 27 November 2024

Dear [redacted]

I have held the 27th November in [redacted] diary and await to hear further from you with regard to timings/venue etc in due course.

Many thanks and best wishes
[redacted]

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Monday, June 10, 2024 8:30 AM
To: Andrew Rhodes [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: BACTA Convention 2024 - Invitation to Speak and Save The Date - Thursday 27 November 2024

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

Hi [redacted]

Many thanks for letting me know.

Best wishes.

[redacted]

[redacted]
[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD

Mobile: [redacted]

Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]gamblingcommission.gov.uk> on behalf of [redacted]
<[redacted]@gamblingcommission.gov.uk>
Sent: 07 June 2024 16:34
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Cc: Andrew Rhodes [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: RE: BACTA Convention 2024 - Invitation to Speak and Save The Date - Thursday 27 November 2024

Dear [redacted]

Thank you for the kind invitation.

[redacted] will attend in Andrew's place this year.

I have copied [redacted] who is [redacted] PA.

Have a lovely weekend when it comes.

Kind regards
[redacted]

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Friday, June 7, 2024 11:58 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: Andrew Rhodes [redacted]@gamblingcommission.gov.uk>
Subject: BACTA Convention 2024 - Invitation to Speak and Save The Date - Thursday 27 November 2024

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

Dear [redacted]

I wanted to give you advance notice of the 2024 Bacta Convention which is being held in London on **Thursday 27 November 2024 from 10am to 1pm.** Note the new date.

We would be delighted if Andrew is able to speak at the Convention (as he has in previous years) and we are flexible on timings for his slot.

I will be able to advise on the specific venue in due course but wanted to give you as much advance notice as possible.

With kind regards.

[redacted]

[redacted]

From: [redacted]
To:
Subject: RE: SESOG - information reporting
Date: 06 November 2024 09:25:00
Attachments: image002.png

Hi [redacted]

Thank you for confirming arrangements.

Kind regards

GAMBLING COMMISSION

[redacted]

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From: [redacted]

[redacted]@bacta.org.uk>
Sent: Tuesday, November 5, 2024 5:12 PM
To: [redacted]gamblingcommission.gov.uk>
Cc: [redacted]bacta.org.uk>
Subject: RE: SESOG - information reporting

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Hi [redacted]

Just to say my colleague [redacted] (copied) is now the main Bacta contact for SESOG. [redacted] will respond to your enquiry.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 05 November 2024 16:54
To: [redacted]
[redacted]@bacta.org.uk>; [redacted]
[redacted]
Subject: SESOG - information reporting

Hi all

Hope you're all well.

Just a quick reminder that the data for July to September 2024 is now due.

Thanks

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[redacted]

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Raising Standards
Date: 11 November 2024 09:01:00

Thanks [redacted]

I have sent an invite for 21/11 at 11am

Thanks

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, November 11, 2024 8:49 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Raising Standards

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

[redacted],

I have spoken to [redacted] and we can both make below....

Tues 19/11 4pm
Thurs 21/11 11am

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 11 November 2024 08:28
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Raising Standards

Hi [redacted]

No problem at all moving the meeting but apologies, I have another commitment at that time today. Let me know of a few times through this week and early next week and we can move the meeting to try and suit everyone. I will struggle to meet the time tomorrow as I have a full day already booked in for other matters.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, November 8, 2024 5:03 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Raising Standards

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

[redacted]

[redacted] Is it possible to bring the Teams meeting forward to 2.30pm instead of 3.30pm....

Cheers [redacted]

From: [redacted]@bacta.org.uk>
Sent: 06 November 2024 11:25
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: Re: Raising Standards

[redacted]
Myself and [redacted] are available for Teams meeting as below:
Mon 11/11 bet 2-5pm
Tues 12/11 bet 11-1pm

Cheers [redacted]

[redacted]
[redacted]
[redacted]
[redacted]
[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: Thursday, October 31, 2024 1:50:33 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Raising Standards

Hi [redacted]
Further to our call.

Thanks for your email. Myself and [redacted] won't be around on 6 November. However, it would be good to catch up with you. Can we arrange a team's call, let me know your availability , a few dates and we can arrange a catch up.

Thanks

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, October 30, 2024 6:57 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: Raising Standards

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[redacted]

I understand you spoke [redacted] this week regarding bacta members requiring improvement around customer interactions. This is as a consequence of the submissions of the Compliance Questionnaire. I note that you wish to work with bacta to raise and improve standards. You will be aware of communication between ourselves and [redacted] regarding the sharing of details of bacta members.

At 10am on Thursday 6th Nov myself and [redacted] from Bacta have a meeting with GC Intell at your offices. I would suggest the meeting will last about an hour. Is it possible to meet with yourself or [redacted] after that meeting to see how we can move forward.....

Cheers [redacted]

From: [redacted]
To:
Subject: RE: Bacta Convention
Date: 12 November 2024 12:42:00

Hi [redacted]

Many thanks for sending the working agenda through, timings look ok for [redacted] He has advised that he will not be using any slides.

Thank you also for confirming that [redacted] and [redacted] are both welcome at the convention.

Best wishes
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, November 12, 2024 9:52 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Bacta Convention

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Hi [redacted]

[redacted] and [redacted] are most welcome at convention!

Please see the following working agenda to be confirmed shortly. Do let me know if Tim and the team would like more time.

10.30 Opening – [redacted]
10:35 Government Relations Update - [redacted]
10:50 Minister Introduction [redacted]
10:52 Minister Speech - [redacted]
11:02 Thank Minister & Intro GC Speaker - [redacted]
11:04 Gambling Commission - [redacted]
11:25 [redacted]
11:35 [redacted]
11:50 Panel – MPs and Stakeholders
12:20 [redacted]
12:30 Question Time
13:00 Close of Convention followed by lunch

Best wishes,

[redacted]

[redacted]

[redacted]

Email: [redacted]@bacta.org.uk

Mobile: [redacted]

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From: [redacted]@gamblingcommission.gov.uk>
Sent: 12 November 2024 9:03 AM
To: [redacted]@bacta.org.uk>
Subject: FW: Bacta Convention

Hi [redacted]

If possible, we would like [redacted] our [redacted] and [redacted] our [redacted] to accompany [redacted] to the BACTA convention. Please can you confirm that this is acceptable?

Also just wondering if the agenda could be shared with us?

Many thanks
[redacted]

From: [redacted]
Sent: Monday, November 4, 2024 11:30 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Bacta Convention

Good morning [redacted]

Thank you for your email. I will check with [redacted] regarding whether he will be using slides, when would you need these by?

I think 20mins will be enough time for him and I can see no objection from him to take questions from the audience.

Have you a draft agenda you could share?

Thanks
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, November 1, 2024 4:00 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Bacta Convention

> You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

I hope you have had a good week.

I am just reaching out ahead of Bacta's Convention later this month, which [redacted] kindly agreed to speak at, to enquire if he had any slides that he would like to be added to the deck?

The current slot for [redacted] with the possibility to extend should he wish. We would also be very grateful if he could take a few questions from the audience and those streaming in from elsewhere.

If you have any questions at this stage, do let me know.

Best wishes,

[redacted]

[redacted]
[redacted]

From: [redacted]
Subject: SESOG [survey summary and dates for next meeting]
Date: 15 November 2024 10:55:00
Attachments: image002.png
SESOG NOVEMBER 2024.pdf

Dear all

Please find attached a slide deck which gives a high level summary of the summer 2024 survey responses.

We are planning to hold an in-person meeting at the Commission's offices before Christmas on one of the following dates:

- 11th December
- 18th December
- 19th December

Please would you let me know whether you are available to attend.

Kind regards

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[redacted]
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GAMBLING COMMISSION

SESOG Survey

November 2024

Contents

1. Working Well

2. Opportunities for Improvement

3. Common Challenges

4. Gambling Commission

Feedback on what is working well

Objectives

Group members see the Group's objectives as positive:

- Forum for collaboration and sharing best practice
- Consumer focus
- Single entry point for consumers

Feedback on opportunities for improvement

Barriers	Suggestions
1. Conflicts of interest	1. Stronger consumer focus
2. Meetings can lack direction	2. Keep target of single entry in mind, with a dedicated working group
3. Too much focus on FR	3. Agree milestones for objectives
4. Ideas don't fully account for some schemes' practical limitations	4. Demo from each scheme

Feedback on common challenges

Single Entry Challenges

Group members see certain common challenges for the Group in achieving a single entry:

- Tension between consumer protection and operator resources and interests
- Different governance models and technology provision arrangements
- Overlap between schemes within sectors currently
- Not all schemes offering national exclusions currently
- Land-based schemes at a different scale to online scheme
- Effectiveness of identification in land-based venues

Feedback on the Gambling Commission

Contributions	Involvement
The contributions of the GC to the Group were valued, including:	One Group member requested the GC leads the Group in order to speed up progress. (The position of the GC remains that schemes need to take ownership of meeting the Group's objectives.)
LCCP interpretation	
direction of travel guidance	
data collection and reporting	
governance	
credibility	

SESOG could be a “significant platform for change”

Group member

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@GamRegGB

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Pro Formas
Date: 19 November 2024 09:26:00
Attachments: image002.png

Thanks all

From: [redacted]@bacta.org.uk>
Sent: Monday, November 18, 2024 4:02 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]
Subject: RE: Pro Formas

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

Hi [redacted]

[redacted]

This this the form we sent out to Bacta members only. See below.

In retrospect we feel we could have asked additional questions such as

- "How many B4 machine do you think would have to scrap?"
- "How many B3 machines do you think you would have to scrap?"

Kind regards.

[redacted]

SURVEY FORM SENT OUT IN SEPTEMBER

Could operators please answer the questions below and return by **Wednesday 25 September 2024**. Sorry for the short timescale. We need to get our evidence to the Gambling Commission asap.

QUESTION	ANSWER
1) How many Cat C machines do you operate?	
2) How many B3/B4 machines do you operate?	
3) How many Cat C machines are networked to manufacturers to download new content?	
4) How many Cat B3/B4 machines are networked to manufacturers to download new content?	

5) How many Cat C machines are analogue?	
6) How many B3 machines are analogue?	

Your individual response will be treated in the strictest confidence and will remain private. The results will be collated into an overall industry number and presented to the Gambling Commission. No individual results will be presented.

Please fill in the questionnaire and return to [redacted]@bacta.org.uk

---

From: [redacted]@gamblingcommission.gov.uk>
Sent: 11 November 2024 12:31
To: [redacted]@bacta.org.uk>; [redacted]
Cc: [redacted]
Subject: Pro Formas

Hi both

We are starting to think through our own potential data requests and how we may go about this.

Would it be possible to share the Pro Formas you used for your data requests during pre-consultation, as this may be informative on how we go about this.

I hope this makes sense but if there are any questions, then please do not hesitate to contact me.

Many thanks

GAMBLING COMMISSION

[redacted]

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Outlook

Bacta Convention Speaking Check in

From [redacted]@bacta.org.uk>
Date Wed 11/20/2024 11:18 AM
To [redacted]@bacta.org.uk>

1 attachment (11 MB)
Bacta Convention Agenda A4 10804 sm.pdf;

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

Good morning,

Thank you very much for confirming your availability to speak at our Convention next week. We are very grateful!

Ahead of time, I wanted to pass on a running order and to check if you needed any briefing materials from us to help with your preparations.

Agenda

10.30 Opening – [redacted]

10:35 Government Relations Update – [redacted]

10:50 [redacted]

11:05 Gambling Commission Update - [redacted]

11:25 [redacted]

11:35 [redacted]

11:50 Panel Discussion with [redacted]

[redacted]

12:20 [redacted]

12:30 Question Time Session with [redacted] and Selected National Council members

13:00 Close of Convention and Lunch

As ever, if you have any questions please do not hesitate to get in touch.

Best wishes,

[redacted]

Email: [redacted]@bacta.org.uk
Mobile: [redacted]

bacta
Delivering the Serious Business of Fun for 50 Years
29-30 Ely Place
London EC1N 6TD

50 YEARS bacta

CONVENTION AGENDA

THURSDAY 28 NOVEMBER 2024

GOING FOR GROWTH

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Agenda

10.30 **Opening**
[redacted]

10:35 **Government Relations Update**
[redacted]

10:50 [redacted]
(DCMS, [redacted])

11:05 **Gambling Commission Update**
[redacted]

11:25 [redacted]

11:35 [redacted]

11:50 **Panel Discussion**
[redacted]

12:20 **President's Address**
[redacted]

12:30 **Question Time Session**
Bacta President and Selected National Council members

13:00 **Close of Convention and Lunch**

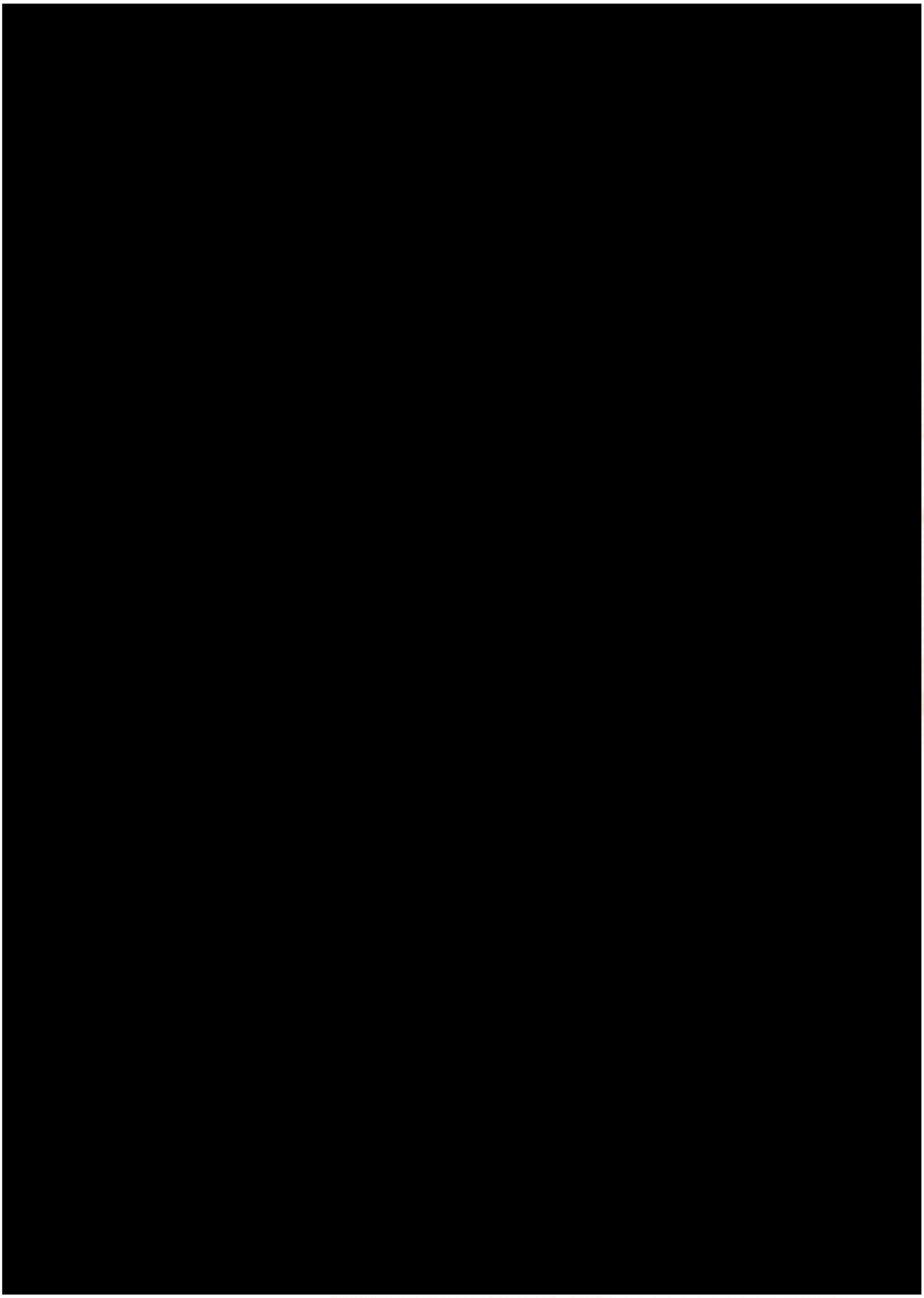
Going For Growth

'This has been a tumultuous year for UK and global politics, at a time when our sector continues to face challenges relating to rising business costs and a lack of regulatory reform.

The first Labour Government for 14 years has came to office on a platform of championing UK growth, promising the fastest growth in the G7. Time will tell what this means for the wider economy but what is clear is that this presents opportunity for the amusement and gaming sector to unlock our economic potential in this post-COVID era.

Chancellor Rachel Reeves' first budget was a disappointing start to this new growth agenda, with increases in Employers' National Insurance contributions, Minimum Wage and Business Rates, set to hit our sector hard.

Throughout the course of this Convention we will hear from influential MPs from across the political divide, Government officials, our regulator and key industry figures. From this we will take stock of where we are as an industry and what we need to see from this Government to see our sector truly go for growth.'



[redacted]

Bacta Charitable Trust

The Bacta Charitable Trust has had another fantastic year, raising £50,000 for our partner Rays of Sunshine, who brighten the lives of seriously ill children across the UK by granting wishes and providing ongoing support in hospitals and the community.

We also welcomed a new charitable partner into the family, Little Lifts. They do brilliant work providing thoughtfully curated gifts to breast cancer patients receiving chemotherapy or radiotherapy treatment. The Trust is very much looking forward to working with the Little Lifts team and seeing what we can accomplish together.

At Bacta's 50th Birthday Party at the ACOS networking event we set a new goal with Rays of Sunshine to grant even more wishes for Children with serious health issues. In Bacta's 50th year we are striving for members to sponsor 50 wishes for seriously ill children. If you or your organisation is able, please do look through the enclosed Rays of Sunshine wish pack and get in touch with me to pledge your support to a wish.

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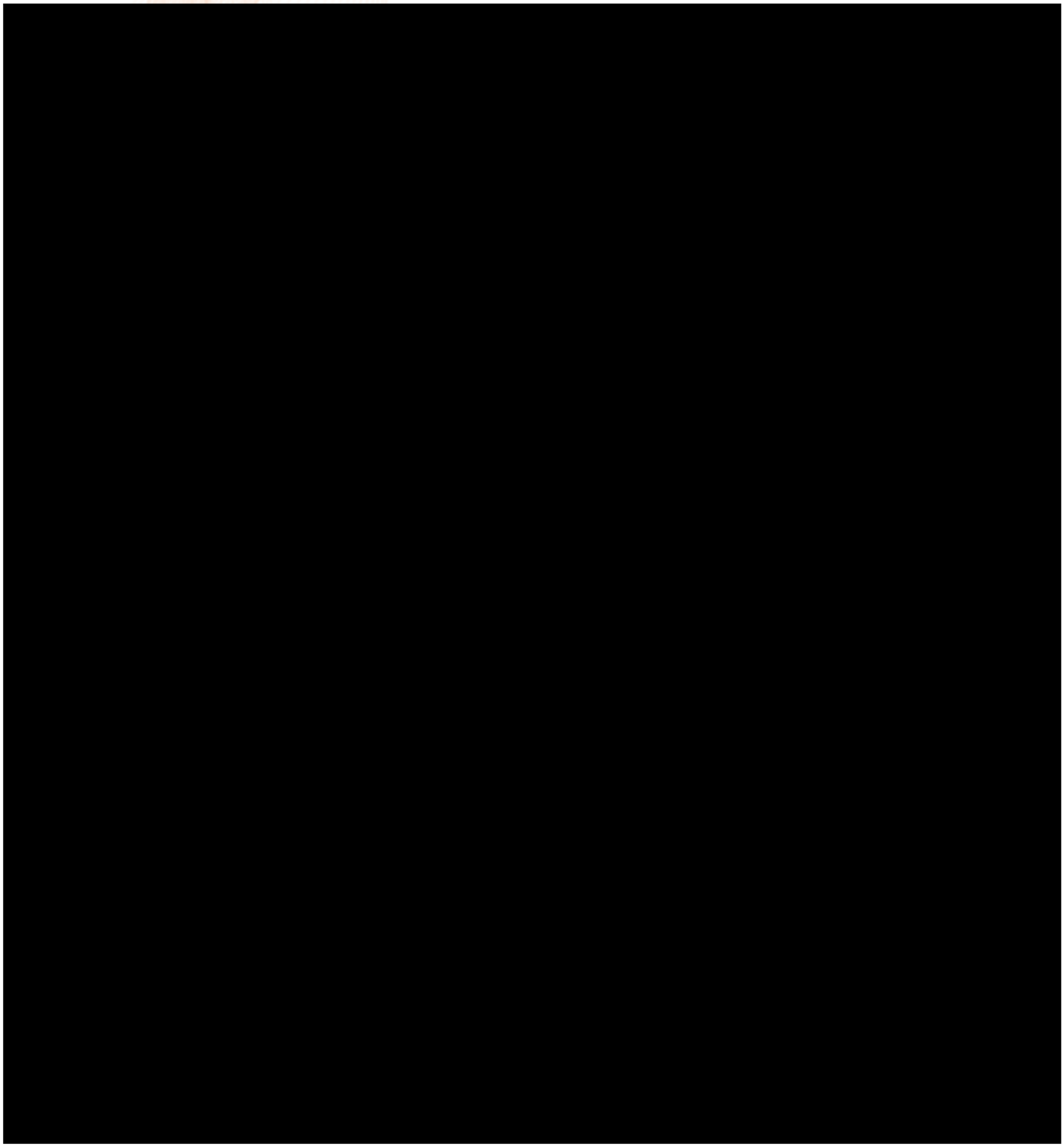

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From: [redacted]
[redacted]
Subject: Re: Operator Engagement Forum
Date: 21 November 2024 11:05:18
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Hi [redacted]
No that's perfect thank you - he just didn't want it to appear on his e-service and miss it.

Brilliant - even if it was just for one day (Wednesday is the busiest day) it would be beneficial to the industry. In the meantime have a great Christmas!

Kindest regards

[redacted]

bacta
Empowering the UK's amusement machine industry

29-30 Ely Place
London
EC1N 6TD
Mobile: [redacted]

Main Line: [redacted]
Web: www.bacta.org.uk

Don’t forget to follow bacta and tickets2wishes on social media - Support #Tickets2Wishes to help Rays of Sunshine grant wishes to children with terminal or life-limiting conditions

@bactauk @tickets2wishes

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From: [redacted]@gamblingcommission.gov.uk>
Sent: 21 November 2024 07:52
To: [redacted]@bacta.org.uk>
Subject: FW: Operator Engagement Forum

Morning [redacted]

Firstly, am sorry in not getting back to you sooner. I didn’t notice there was a query in your email and was just looking into whether I can attend the invite.

Thanks so much for inviting me. I am still looking into whether I can go on behalf of the GC. If I can, I certainly will. I will confirm once I get a steering.

In relation to the specific query. Looks like the Operator thought they would be breaching the fee category so has done the variation to increase the fee category.
The increased fee category is effective immediately but the increased annual fee only takes place at the next renewal, we don't pro-rata for the remaining year.

I hope this answers the query but if not let come back to me.

Thanks

GAMBLING COMMISSION
[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Tuesday, November 12, 2024 11:54 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Operator Engagement Forum

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Hi [redacted]
I hope you are well! Further to the voicemail left this morning I'd like to extend an invitation to you to attend our EAG Show 14th - 16th January. [redacted] has confirmed that the GC will be present and I was hoping that you may be able to attend to help operators with licensing queries. Not all operators who attend are Bacta members - some join at the show but regardless it would be great to have a licensing presence if you are available?

Secondly I've had a query from an operator who has gone up a fee grade when they have submitted their 3rd quarter return (just submitted in October) as he thinks he will surpass the limit. He was unsure as to whether the additional charge for the 4th quarter will be invoiced separately or added to his 2025 invoice, and if it will come as an email or he needs to keep checking his E-service - any advice/guidance will be welcome!

Kindest regards

[redacted]

29-30 Ely Place
London
EC1N 6TD
Mobile: [redacted]
Main Line: [redacted]
Web: www.bacta.org.uk

Don't forget to follow bacta and tickets2wishes on social media - Support #Tickets2Wishes to help Rays of Sunshine grant wishes to children with terminal or life-limiting conditions

@bactauk @tickets2wishes

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From: [redacted]@gamblingcommission.gov.uk>
Sent: 03 October 2024 15:28
Subject: Operator Engagement Forum

Hi all,

on the back of the recent Operator Engagement Forum, I just wanted to reach out and say thank-you for attending. For those that were unable to make it, I hope to meet you at the next one.

A special thanks to [redacted] for leading the table on the day. I thought we had some really good open conversations and high engagement on the sessions throughout the day. I am currently collating the notes for our table as well as combining them all for the other tables to see what actions and takeaways we can identify.

A few things I wanted to mention on the back of our conversations:

- I have provided [redacted] ome positive feedback as part of our internal recognition process. This was based on the conversation around sharing enforcement experiences. It was good to hear the positive journey and thought it would be worthwhile recognising [redacted] for this.
- Here is a link on our website which provides a list of Key events for Operators which we discussed on the day. [redacted]
- Here is a link on advertising and marketing rules and regulations based on a topic of discussion we had Advertising and marketing rules and regulations (gamblingcommission.gov.uk)

A couple questions and a request that were asked on the table:

Why isn't the National Lottery required to pay the RET (Responsible Gambling) Levy?
Why is each Operator only allocated one login to e-services?
A request was asked around splitting out the compliance data provided on the day from non-remote to remote.

These will be passed over as part of the actions and takeaways and we will consider them and look to provide a consistent response.

If you require anything from me do not hesitate to reach out. It was nice to meet you all.

Kind regards

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From: [redacted]
To: [redacted]
Subject: RE: Re Age verification and test purchasing - non remote
Date: 21 November 2024 08:21:00

Super, thanks [redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, November 21, 2024 8:20 AM
To: [redacted]gamblingcommission.gov.uk>
Subject: RE: Re Age verification and test purchasing - non remote

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Hi [redacted]

I will send a Teams invite for 10.00am.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 21 November 2024 05:48
To: [redacted]@bacta.org.uk>
Subject: RE: Re Age verification and test purchasing - non remote

Hi [redacted] I can do a Teams at any time next Tuesday apaprt from 11.00 – 12.30. [redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, November 20, 2024 4:51 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Re Age verification and test purchasing - non remote

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Hi [redacted]

I am sorry I haven't got back sooner. We have our convention next week and are just completing our Audit, so it has been a bit hectic.

I could do a Teams meeting next Tuesday 26h November am or Friday 29th November pm.

I will be in Birmingham on either the 3rd or 5th of December if you would prefer a face to face.

I look forward to hearing from you.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 25 October 2024 06:44
To: [redacted]@bacta.org.uk>
Subject: RE: Re Age verification and test purchasing - non remote

Ok [redacted] – thanks [redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, October 24, 2024 6:15 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Re: Re Age verification and test purchasing - non remote

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Hi [redacted]

[redacted]. I will email some dates when I get back to set up either a face to face or teams meeting.
Best wishes

[redacted]

> On 23 Oct 2024, at 10:27, [redacted]
> [redacted]@gamblingcommission.gov.uk> wrote:
>
> Hi [redacted]
>
> That would have been handy. Unfortunately I have meetings all day. However maybe we can do it over Teams next week? [redacted]
>
> ---
>
> **From:** [redacted]@bacta.org.uk>
> **Sent:** Wednesday, October 23, 2024 9:37 AM
> **To:** [redacted]@gamblingcommission.gov.uk>
> **Subject:** RE: Re Age verification and test purchasing - non remote
>
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Hi [redacted]

Sorry I haven't got back to you sooner.

You may be aware that we use a third-party company called Check Policy to carry out age verification checks on our relevant member arcades. We also have a team of Membership Support Officers that support our members in compliance matters.

I have a meeting with one of your colleagues at 10.00am on the 6th of November at your offices in Birmingham. If you are available, it would be good to have a catch up meeting afterwards.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 06 September 2024 13:21
To: [redacted]bacta.org.uk>
Subject: RE: Re Age verification and test purchasing - non remote

Hi [redacted]

The Commission thought it would be timely to remind relevant Trade Associations in regard to the AV testing processes for the NR sector. You are no doubt aware the smaller (Cat A and B operators) are now required to conduct AV TP as well as submit the results themselves, not via their TA. Should you not have already done so (which you may well have done) it might be timely to give them a nudge. The E Bulletin has already issued a number of reminders. The following was published on 1st May 2024. Summer 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response - Summary - Strengthening age verification in premises (gamblingcommission.gov.uk)

Secondly there is an ordinary code provision regarding under 25s which affects all operators irrespective of size. This is also covered in the E Bulletin.

More generally we would be interested to hear if there has been any notable technological innovations or other changes that are being adopted within your sector(s) in regard to AV. We would be interested to hear of any developments.

Should you have any questions please drop me a line

Best [redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, September 5, 2024 4:17 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Re Age verification and test purchasing - non remote

> You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

I have had your email below directed to me.

The Age Verification service to members currently falls under my remit along with the Membership support officers.

Please let me know if there is anything I can do to help.

Best wishes

[redacted]

[redacted]

[redacted]
[redacted]

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29-30 Ely Place
London
EC1N 6TD
[redacted]
[redacted]
Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 04 September 2024 07:11
To: [redacted]@bacta.org.uk>
Subject: Re Age verification and test purchasing - non remote

Good morning,

can you please let me know who currently is responsible for this issue. Thanks in anticipation.

Regards

[redacted]
[redacted]
Gambling Commission
Victoria Square House
Victoria Square
Birmingham
B2 4BP
[redacted]

[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]
To:
Subject: Re: BACTA Convention
Date: 27 November 2024 14:11:14
Attachments: image002.png
image003.png

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Regards

[redacted]
Sent from my iPhone

On 27 Nov 2024, at 14:09, [redacted]
[redacted]@gamblingcommission.gov.uk> wrote:

Thanks for confirming [redacted] has another meeting at 3pm so I'll suggest he calls you at 2:30pm. Should that not happen, there is time at 4pm.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, November 27, 2024 2:07 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: BACTA Convention

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Thank you for this [redacted] anytime after 2.30 but before 5 would be great.

Regards

[redacted]
Sent from my iPhone

On 27 Nov 2024, at 13:26, [redacted]
<[redacted]@gamblingcommission.gov.uk> wrote:

Hi [redacted]

[redacted] is in meetings until 2pm, could you make time for the call at 2:30pm? If so, I'll add the to his diary and ask him to call you. For future reference [redacted] work mobile number is [redacted]

Thanks
[redacted]

<image001.jpg> [redacted]
www.gamblingcommission.gov.uk <image002.png>

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, November 27, 2024 12:56 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: BACTA Convention

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Hi [redacted]

I did want to call you to check on arrangements for you speaking tomorrow at the convention, but unfortunately do not have a contact phone number.

If you get a chance, could you call me (number below)

Regards

[redacted]

[redacted]

[redacted]

From: [redacted]
To:
Subject: RE: SESOG meetings - Dec and Jan
Date: 29 November 2024 14:33:00
Attachments: image002.png

Hi [redacted]

Thank you for confirming your availability.

Kind regards

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[redacted]

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From: [redacted]

[redacted]@bacta.org.uk>
Sent: Friday, November 29, 2024 2:10 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: SESOG meetings - Dec and Jan

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Hi [redacted]

It is our National Council meeting on the 12th and my replacement would unfortunately be at this meeting as well.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 28 November 2024 12:15
To: [redacted]@bacta.org.uk>
Subject: RE: SESOG meetings - Dec and Jan

Hi [redacted]

Thank you for providing your dates.

I'm trying to get everyone's availability to tally and wanted to check whether you might be able to rearrange your commitments on 12 December for the Teams call or arrange for

another representative to attend instead.

Kind regards

GAMBLING COMMISSION

[redacted]

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From: [redacted]

[redacted]@bacta.org.uk>
Sent: Wednesday, November 27, 2024 11:36 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: SESOG meetings - Dec and Jan

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Hi [redacted]

I can do either of the times on the 9th but can't do the 12th December.

I can't do the 23rd as I have a National Council meeting but can do the 30th January 2025.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 27 November 2024 10:47
To: [redacted]@bacta.org.uk>
Subject: FW: SESOG meetings - Dec and Jan

Hi all

Please would you let me know if you can make a Teams call on:

- 9 Dec – 1-2pm
- 9 Dec – 2-3pm
- 12 Dec – 3-4pm

We're also setting up an in-person meeting on either:

- 23 Jan
- 30 Jan

Please would you let me know as soon as possible.

Thank you

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[redacted]

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From: [redacted]

Sent: Friday, November 22, 2024 2:46 PM

To: [redacted]@bacta.org.uk>; [redacted]

Subject: SESOG meetings - Dec and Jan

Hi all

We are looking to arrange a Teams call for an hour before Christmas and I've collated some possible dates:

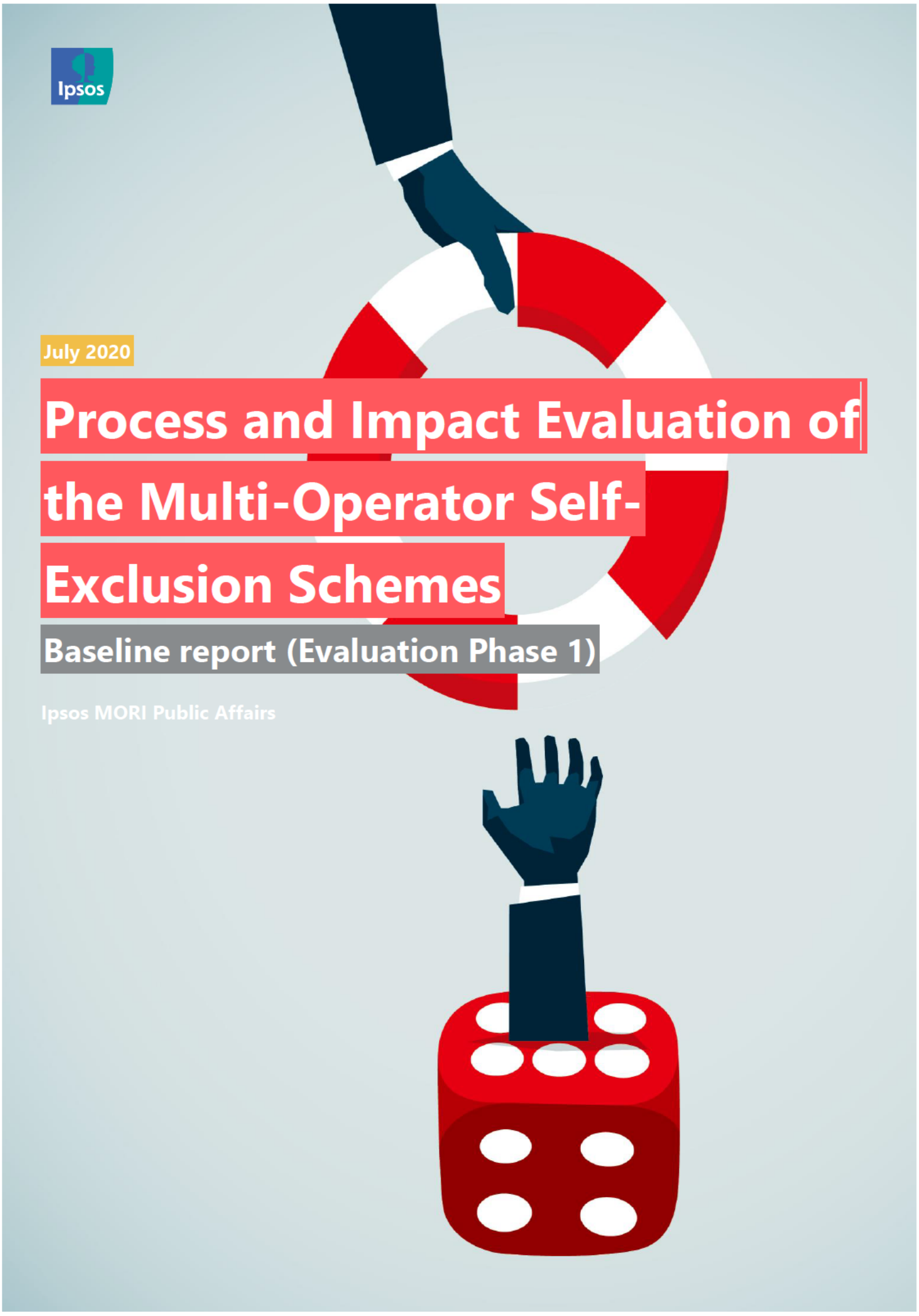
Date	Time
2 Dec	11-12
3 Dec	1.30-2.30
4 Dec	11-12
9 Dec	1-2
9 Dec	2-3
12 Dec	3-4
12 Dec	4-5
16 Dec	1-2
16 Dec	2-3

We are also scheduling an in person meeting for either 23 or 30 January 2025.

Please would you let me know your availability. I've uploaded a document to SharePoint for you to use SESOG meeting availability.docx

If you prefer, you can email me instead.

Thanks all, have a lovely weekend.



July 2020

Process and Impact Evaluation of the Multi-Operator Self-Exclusion Schemes

Baseline report (Evaluation Phase 1)

Ipsos MORI Public Affairs

18-038856-01 Multi-Operator Self-Exclusion Scheme Evaluation Report Phase 1 | This work was carried out in accordance with the requirements of the international quality standard for Market Research, ISO 20252, and with the Ipsos MORI Terms and Conditions which can be found at http://www.ipsos-mori.com/terms. © GambleAware 2020

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1 Introduction

This is the report of findings from Phase 1 of the evaluation of Multi-Operator Self-Exclusion Schemes.[1]

This report is structured as follows:

- The remainder of the Introduction presents an overview of the Multi-Operator Self-Exclusion Schemes and a summary of the objectives of the evaluation.
- Chapter 2 is a stand-alone **Executive Summary**.
- Chapter 3 details **the evaluation framework** - the Theory of Change and process map which were developed at the inception stage. The Theory of Change describes the causal links through which the Multi-Operator Self-Exclusion Schemes inputs and activities are anticipated to lead to target outputs and outcomes. The process map illustrates the key processes involved in the implementation and delivery of the scheme's impacts.
- Chapter 4 gives a more detailed account of the **objectives of the evaluation and an overview of the methodological approach**.
- Chapters 5-7 present the **key findings** under the headings of **planning, implementation** and **delivery**. Each of these chapters will:
    - Revisit the context in which the current schemes are operating[2] (as identified in the scoping interviews with providers);
    - Present the findings and whether outcomes are being achieved; and
    - Provide recommendations to support the desired outcomes.

Overview of Multi-Operator Self-Exclusion Schemes

Since April 2016, the Gambling Commission has required all non-remote operators[3] in the land-based arcade, betting, bingo and casino sectors to participate in **multi-operator self-exclusion schemes**, in addition to offering their own single-operator schemes. The multi-operator schemes were developed and managed to allow

[1] As the evaluation will be largely limited by the availability of usable sample of problem gamblers and Multiple-Operator Self-Exclusion Scheme users, the evaluation programme has been divided into two phases – the first of which primarily focuses on the scoping phase where we will determine the availability of this sample and its potential use (for example if longitudinal research will be a possibility). The commissioning of the second phase is subject to the findings of this first phase.

[2] Please note fieldwork took place January – December 2019 (pre COVID-19 pandemic and UK lockdown)

[3] Land based operators with physical premises, excluding online

customers to exclude from multiple operators from that sector with a single request. The current schemes include:

- **Self-Enrolment National Self-Exclusion (SENSE)** which allows people who believe they have a problem with their gambling to voluntarily enrol in a scheme to exclude themselves nationally from all land-based **casinos** in Great Britain.

- **The Bingo Industry Self-Exclusion Scheme** enables people to request exclusion from all land-based licensed **bingo** premises across Great Britain via the Bingo Association;

- **The Multi Operator Self Exclusion Scheme (MOSES)** for Betting Shops, run by a subsidiary of the Senet Group, allows people to self-exclude from **betting** shops centrally with more than one operator by contacting a call-centre;

- **Bacta and Smart Exclusion (IHL)** are two separate multi-operator self-exclusion schemes for the **arcades** sector which work collaboratively to provide a single scheme for consumers who gamble in this sector, and;

- **GAMSTOP**, a service which allows users to self-exclude from **online** gambling.

It should be noted that in March 2020, responsibility for SENSE was transferred to the Betting and Gaming Council (BGC). Although the BGC is the single industry association for betting and gaming, representing betting shops, online gaming businesses and casinos, MOSES and GAMSTOP remain independent schemes

If a gambler thinks that they are spending too much time or money gambling – whether online or in gambling premises – and wish to be supported in their decision to stop, they can opt-in to one of these Multi Operator Self-Exclusion Schemes and ask to self-exclude from multiple operators across a sector. The consumer enters a voluntary agreement that commits them to abstain from gambling and the operators to take all reasonable steps to prevent them from gambling with them for a period of time. The minimum self-exclusion period is six months.

According to recent research undertaken by the Gambling Commission,[4] 5% of gamblers have self-excluded and a further 42% of gamblers are aware of the scheme facility but have not self-excluded. Men and those aged 25-34 are most likely to self-exclude. The most common reason gamblers give for having entered into a self-exclusion is to help the individual control the amount they were gambling overall (50%), followed by wanting help to control spending with a particular gambling company (41%).

[4] Gambling Commission, Gambling participation in 2019: behaviour, awareness and attitudes. Annual report (Feb 2020)

Objectives of the evaluation

The key aim of the evaluation is to explore how far Multiple-Operator Self-Exclusion Schemes have led to the desired changes in levels of awareness and to explore perceptions and delivery arrangements of the schemes. It also aims to highlight any unanticipated barriers to the achievement of the self-exclusion objectives that might form the focus of future policy improvements. For completeness, the objectives outlined below are for the full evaluation programme (including Phase 2).

Whilst many of the objectives related to understanding and improving the efficiency of the Multi-Operator Self-Exclusion Schemes can be answered in Phase 1, this phase is predominantly a formative evaluation which is not expected to provide an empirical assessment of impacts. The latter will be achieved from the completion of Phase 2 of the evaluation, where we hope to build in longitudinal insight from multi-operator self-excluders and quantitative results from engaging with a larger sample of scheme users.

Objectives have been grouped by audience, and for clarity, the objectives which relate to Phase 1 have been labelled as such '(1)' and those which will be partially achieved from this initial stage and fully achieved through the completion of Phase 2, have been labelled '(1/2)' below.

Gamblers experiencing harms and users of self-exclusion schemes/Multi-Operator Self-Exclusion Schemes

- Determine levels of awareness and perceptions around the schemes (1);[5]
- Assess the accessibility of the schemes and identify barriers that may prevent someone from self-excluding (1);
- Assess the effectiveness of self-exclusion generally and Multiple-Operator Self-Exclusion Schemes specifically as a harm minimisation tool (1/2);[6]
- Identify whether self-excluding prompts further harm minimisation actions addressing gambling behaviours, and vice-versa (1/2); and
- Identify possible improvements to each of the five schemes (1).

Operators and frontline staff within each sector

- Assess the effectiveness of the staff training (1);
- Assess the effectiveness of communication activities and marketing material to inform gamblers of the Multi-Operator Self-Exclusion Schemes (1);
- Establish whether staff are supported by appropriate self-exclusion identification systems (1); and

[5] '(1)' - indicates that we would expect to achieve this objective during Phase 1 of the evaluation.

[6] '(1/2) – indicates that we would expect to partially achieve this objective during Phase 1 using indicative findings and fully at Phase 2

- Ascertain the level and extent of monitoring information collected which supports staff in registering gamblers displaying harmful behaviour and/or identify those who attempt to breach their self-exclusion period (1).

Multi-Operator Self-Exclusion Scheme owners by sector / Gambling Commission

- Determine the effectiveness of current communication methods between Multiple-Operator Self-Exclusion Schemes providers and operators (1);
- Identify any barriers to completing a registration with gamblers who make contact with Multi-Operator Self Exclusion Schemes (1);
- Assess uptake of offer of treatments or formal support for self-excluded gamblers (1/2); and
- Determine the feasibility of contact sample from those who have chosen to self-exclude (1).

2 Executive Summary

Introduction

This executive summary encapsulates the findings from Phase 1 of the evaluation of Multi-Operator Self-Exclusion Schemes.

The key aim of the evaluation is to explore how far Multiple-Operator Self-Exclusion Schemes have led to the desired changes in levels of awareness and to explore perceptions and delivery arrangements of the schemes. It also aims to highlight any unanticipated barriers to the achievement of the self-exclusion objectives, so that these might form the focus of future policy improvements.

The evaluation is phased to be delivered in two parts. The first phase is focussed on understanding and improving the efficiency of the Multi-Operator Self-Exclusion Schemes and providing a limited assessment of the impact of the schemes on individuals. This predominantly formative assessment will inform a longer-term goal (as part of Phase 2) to assess scheme effectiveness in securing anticipated impacts: in modifying harmful gambling behaviours and reducing problem gambling-related harms. From a practical perspective, Phase 1 will also provide insight on the methodological approach to achieving Phase 2.

Overview of the Multi-Operator Self-Exclusion Schemes under evaluation

A summary of the schemes is detailed in table 2.1 below, however the primary differences between schemes, which have relevance for the findings, are:

- Contextual: whether an individual is required to register to gamble in that sector as part of a formal membership scheme (in most Bingo only venues and casinos); and
- Reach: some Multi-Operator Self-Exclusion Schemes have national, and some have only regional or local coverage.

Table 2.1: A summary of Multi-Operator Self-Exclusion Schemes

Sector	Bingo membership	Casino Membership	Online	Bingo High Street	Arcades	Betting
Scheme provider	Retail Bingo Association	National Casino Forum*	GAMSTOP*	Smart Exclusion	Bacta	Senet Group*
Names of scheme	Bingo Industry Self-Exclusion Scheme	SENSE	GAMSTOP	Smart Exclusion	Bacta	MOSES
Exclusion coverage	National Great Britain	National Great Britain	National* Great Britain	1000 meters	1000 meters	specific shops identified
Length of exclusion period available	12 months	6 months	6 months, 12 months or 5 years	12 months	6 months 12 months	12 months

The findings in this report are based upon primary evidence gathered from the following sources:

- The scheme providers representing Bacta and Smart Exclusion, the Bingo Industry Self-Exclusion scheme, GAMSTOP, MOSES and SENSE;
- Compliance officers and frontline staff representing the arcade, bingo, online, betting shop and casino sectors;
- The general public, including gamblers who are not signed up to a Multiple-Operator Self-Exclusion Scheme; and
- Users of the Multiple-Operator Self-Exclusion Schemes.

Considerations

At the time of fieldwork:

- The provision of GAMSTOP (the online Multi-Operator Scheme) was not a licensing condition for operators;
- The Betting & Gaming Council, which is the new trade body for the casino, online and betting sectors, had yet to be established; and
- There was no evidence of the Coronavirus in the UK. Lockdown in the UK commenced 23 March 2020 - fieldwork took place January – December 2019.

The work undertaken to consult with compliance officers, frontline staff and multi-operator self-exclusion scheme users was qualitative in nature. This means that a relatively small sample of these populations was consulted and as such their results are indicative of what we may have found had we interviewed a larger sample, but they cannot be extrapolated to represent the whole population.

Overview of findings

What is working well:

- Identification of individuals who try to breach their self-exclusion agreement works well when an individual is required to provide membership details before they can gamble.
- The Multi-Operator Self-Exclusion Scheme promotional materials for consumers are clear and easy to understand. There is a need, however, for improved visibility (see point below re the need for stronger promotion).
- The sign-up process to Multi-Operator Self-Exclusion Schemes is generally considered straight forward.
- Whilst the long-term impact of the Multiple-Operator Self-Exclusion Schemes is yet to be evaluated, there is an indication that at least in the short-term the schemes are proving effective for scheme users either by modifying their behaviour or (at the point of interview) having completely stopped them from gambling in the sector.

Areas for improvement:

- Identification of individuals who try to breach their self-exclusion agreement in non-membership premises requires further development.
- Staff training appears to be inconsistent. Weaknesses include:
  - Training coverage – staff churn and part-time staff make dissemination of information challenging.
  - Staff confidence – to approach a gambler who is displaying harmful gambling behaviour or to challenge an individual who is in breach of their exclusion agreement.
  - Not all staff are trained to register an individual to their sector specific Multi-Operator Self-Exclusion Scheme.
  - There was evidence that on occasion, frontline staff actively advise against Multi-Operator Self-Exclusion as they deem it to be an uncompromising option for an individual.
- There is a need for stronger promotion of the schemes. Generally, there is low public awareness. Scheme users generally became aware of the Multi-Operator Self-Exclusion Schemes through internet searches or recommendations from concerned friends and relatives, rather than through active promotion by the operators.
- Communication to scheme users as to how the Multi-Operator Schemes works could be strengthened. There was evidence of incorrect assumptions from scheme users about the coverage of schemes (geographic/cross sector/online vs land-based operators) and the length of the exclusion.
- There is limited cross-promotion of schemes. Operators in one sector are not taking opportunities to direct gamblers to schemes in other sectors.
- Systems to aid the identification of individuals who try to breach are limited in their effectiveness – either because these rely on members of staff remembering faces, or because the quality of digital facial recognition software is not particularly sophisticated.

Key findings

The Multiple-Operator Self-Exclusion Schemes Operating Models

Each gambling sector is at different stages of development of their Multiple-Operator Self-Exclusion Scheme. Whilst there is motivation from the scheme providers to develop robust schemes, a membership operating model i.e. where an individual requires an ID card or login details to gamble, has two distinct advantages: the ability to assess and understand the gambling behaviour of individuals through customer data analytics; and the ability to identify those who are attempting to breach their self-exclusions via unique ID verification.

Non-membership venues are reliant on staff identifying customers through photographs which requires regular updates, a good memory and/or knowing your customers in order to prevent breaches. Facial recognition software can support customer recognition, but some operators believed that it had greater levels

of success if the venue has a single easy to manage access point. A challenge to the betting shop and arcade sectors is whether account based play could be incorporated into their operations.

At the time of fieldwork, GAMSTOP was still an embryonic scheme which was yet to be made a licensing condition for operators[7], but early evidence would suggest that it is working well.

Effectiveness of training for frontline staff

There is clear evidence that scheme providers are cascading policies, procedures and staff training to compliance officers to disseminate to operating staff. Frontline staff engaged with this evaluation were aware of their obligations in relation to Multiple-Operator Self-Exclusion Schemes, but there was concern from compliance officers and frontline staff that staff churn and a relatively high proportion of part-time staff made dissemination of information a challenge.

Evidence from scheme users and feedback from frontline staff also suggest there is a need for improved training in relation to customer interactions. This is two-fold, firstly identifying when a customer is showing signs of stress[8] and secondly in challenging an individual who they suspect of breaching their self-exclusion 'contract'.

It is recommended that operators develop concise and practical material that staff can easily access when facing a situation where they think customers may benefit from customer interaction. Such guidance material should provide clear steps for staff to abide by if deciding to approach the customer and signpost them to support and advice including Multiple-Operator Self-Exclusion, and a summary of the key terms and conditions of the scheme.

Electronic means of training, such as podcasts and distribution of digital content, should be recommended as a potential means to increase reach to more staff and reduce the need for group events and multiple site visits by operator compliance officers. There was also a desire from operator staff to be exposed to more training videos of interactions between customers and staff at the point where that individual should be approached because they are self-excluded and attempting to breach this self-exclusion.

Awareness and promotion of Multiple-Operator Self-Exclusion Schemes

Generally, there is low public awareness of Multi Operator Self-Exclusion Schemes, including amongst 'at risk'[9] gamblers. Many scheme users became aware because they sought out information on self-exclusion themselves or heard about a scheme through someone they knew (who had also actively sought the information), usually as a first port of call to stop their gambling after a catalytic moment or event (e.g. a big loss).

[7] GAMSTOP was launched in April 2018 and will be required by operators from April 2020

[8] This is prior to an individual making themselves known to staff that they would like to self-exclude.

[9] [9]At risk is defined as per an individual's PGSI score - either low risk, moderate risk or problem gambler

While Multi Operator Self-Exclusion materials were seen to be clear and effective in explaining what the schemes entail, many gamblers felt that the promotional materials were not made sufficiently visible to those who may need this information.[10] A review by operator compliance officers of the way in which the scheme is promoted on premises would be welcome to ensure visibility and consistency. Consistent branding of Multi-Operator Self-Exclusion Schemes should also be explored – as a minimum, this could be a shared slogan.

One cross-sector Multiple-Operator Self-Exclusion Scheme?

The volume of users and whether a scheme is membership based or not has an impact on operators' ability to identify those who self-excluded and are attempting to breach. There is a desire from many scheme users for an all-encompassing cross sector scheme. Whilst scheme providers suggest that promoting the remote operator scheme for their sector may be practical, it would be impractical to administer as there are over 1 million incidences of self-exclusion online. This would be impossible to monitor in venues with current photo recognition processes and limited facial recognition software.[11]

Improved cross-promotion of schemes is something that would be straightforward to deliver in the short-term which scheme users would welcome. Some scheme users interviewed in this evaluation believed that they should be made aware of other Multi-Operator Self-Exclusion Schemes in other sectors when registering for a specific sector, including online (if registering on a non-remote scheme) or vice versa.

Barriers to Multiple-Operator Self-Exclusion Schemes which have been identified

When it comes to registration there is a need for immediacy – otherwise that individual may change their mind to the detriment of their well-being. Barriers to an individual being able to register immediately include:

- **Having a hierarchical internal process for registration.** In some sectors, there is a need for an individual to register for a Multiple-Operator Self-Exclusion Scheme with a manager and that person of seniority is not always available on the premises[12]
- **Not being able to register on-site –** this is specifically in relation to MOSES where you can only register via a contact centre for the Multi-Operator Self-Exclusion Scheme.
- **Not being able to register with other sectors' Multiple-Operator Self-Exclusion Schemes at one location**
- In the case of MOSES, **having to list the individual addresses and postcodes of the venues from which to self-exclude** – there was a desire from scheme users to simplify this process by specifying a radius. Taking this recommendation further, the use of mobile technology (in the form of an app) would enable an individual to pinpoint their location and the location of betting shops within a radius and to communicate their 'bulk' request for exclusion to the scheme provider.

[10] It is acknowledged, however, that effective marketing of the schemes may generate higher volumes of scheme users which are unmanageable for the operators without a significantly different approach to identification.

[11] Industry Statistics, Gambling Commission, (September 2018) – Please note the number of people who have self-excluded may be lower than these figures suggest because individuals may have self-excluded from more than one operator and therefore been counted more than once.

[12] Gambling Commission guidance suggests that all front line staff should be sufficiently trained to feel confident to administer the self-exclusion process

Among gamblers who have not self-excluded through a Multi Operator Self-Exclusion Scheme, the perceived barriers included:

- A **lack of perception that they were experiencing some level of gambling-related harm**, despite some gamblers citing risky gambling behaviours;
- A perception generally that self-exclusion does not work, either because of **a lack of confidence in premises' or websites' ability to prevent breaching**, or because it is not sufficiently broad to prevent harmful gambling behaviour beyond the exclusion areas or in different sectors.
- A perception that **it is not realistic to expect frontline staff to enforce self-exclusion** effectively. Some also doubted staff motivation and talked about the incentives that they have to allow those harmed by gambling to gamble uninterrupted.
- That **the length of the exclusion period** might put people off signing up. However, others conversely, felt exclusions were not long enough.

Perceptions of the effectiveness of Multiple-Operator Self-Exclusion Scheme

The evidence suggests that some gamblers demonstrating harmful behaviour do utilise self-exclusion as a tool to reduce or control their gambling. In our qualitative interviews with scheme users we found that self-exclusion tended to be the first harm-minimisation tool sought out – often where the scheme user enquired about banning themselves from a specific venue or sector.

Whilst the long-term impact of the Multiple-Operator Self-Exclusion Schemes is yet to be evaluated, there is an indication that at least in the short-term, the schemes are proving effective for scheme users either by modifying their behaviour or (at the point of interview) stopping them gambling completely. The reasons why the schemes were considered effective varied:

- **Faith in the system** – some individuals simply assumed that if they did attempt to breach, they would be caught.
- **They were psychologically able to draw a line under their behaviour** - making the decision to self-exclude made some individuals less likely to want to try to gamble.
- **Making gambling less convenient** - even if sector schemes were breached, it was found that all schemes have some degree of effectiveness as it requires more effort from the individual to gamble[13]. By virtue of this they then spend less time and money gambling than if not self-excluded.
- **Being caught when attempting to breach** - Those who self-excluded from within the membership sector (bingo and casinos) were more likely than those in other land based schemes to have been stopped when entering the premises, as the individual is required to either show membership or an ID at entry point, which immediately flags their identity to staff.

There were however examples among scheme users of those who had continued gambling. Those who did continue gambling tended to do so by going to venues outside their self-exclusion zone (i.e. with MOSES or

[13] For example, they would have to travel further distances or have their gambling cut-short if they were caught breaching.

Bacta). Few would gamble in a different sector from which they were self-excluded, although there were some instances where an individual would start or increase their online gambling. Some of these individuals would then later self-exclude through GAMSTOP after noticing they were transferring their problem gambling to online. It is also worth noting that some individuals registered with GAMSTOP after registering with one of the land-based schemes simply as a safety net even if they had rarely gambled online. This evidence adds to the discussion on whether an automatic self-exclusion from online gambling should be considered when registering through a land-based scheme.

There is **desire among scheme users for self-exclusion periods to be longer.** In some cases, scheme users said they would have preferred an indefinite self-exclusion period. This does present a challenge for non-remote scheme providers as a scheme-user's appearance can change and it can make it more challenging to identify a breach. Longer self-exclusions would also mean greater volumes of self-excluders for staff to memorise and identify. The varying time-lengths for each of the schemes also created some confusion, with a few scheme users who were registered to more than one scheme not recalling which scheme ends at which point. Some users reported they did not want to visit a gambling premises to obtain these details out of fear or anxiety. More consistency on providing scheme users with details about their self-exclusion should be considered including allowing users to access this information digitally so there is no need for them to visit a gambling premises to obtain this information.[14]

Supporting harm minimisation tools

The effective implementation of Multiple-Operator Self-Exclusion Schemes is expected to lead to gamblers experiencing harms registering to such a scheme. In doing so, we would also expect self-excluded gamblers to be referred to treatment providers or other harm-minimisation services.

In our interviews with scheme users we found treatment services (e.g. GAMCARE and Gamblers Anonymous) to be the primary services to have been signposted when individuals were registering for self-exclusion. This was most often mentioned by GAMSTOP scheme users while it was also mentioned, though less frequently, by MOSES and Bacta scheme users.

Our survey with the general public also showed that some online gambling self-excluders have used additional blocking software as a tool, although this was not said to be directly as a result of the GAMSTOP registration process.

Gaps in evidence to be addressed

There are gaps in evidence which have been identified during Phase 1 of the evaluation. These areas for further investigation have been identified below and will be incorporated into the design of Phase 2.

[14] it would also be advisable to review the performance of GAMSTOP's new consumer account functionality once it has bedded in, as this allows an individual to check the status of their exclusion and to extend it.

- Guidance from the Gambling Commission states that Multi-Operator Self-Exclusion should be one of a suite of harm minimisation tools offered to an individual who is displaying harmful gambling behaviour. We would therefore have expected greater evidence of scheme users also trialling other methods of harm reduction, but this was not the case. What is unclear is whether this is due to a lack of knowledge or confidence on the part of operator staff to suggest these additional measures, or whether it is a wish of the individual requesting to sign up to the scheme. There is also evidence to be collected around whether Multi-Operator Schemes are more effective if they are supported by additional harm minimisation strategies.
- To understand the potential scope of using play data, relevant only to account based play, to better understand the gambling behaviour of individuals, so those who are displaying harmful behaviour, for example based on unusual patterns of play may be identified quickly and signposted to help.
- The identification of ongoing data collection and monitoring activities which will support scheme improvements through the sharing of best practice at a sector level, among sectors and with the Gambling Commission.

3 Overview of Multiple-Operator Self-Exclusion Schemes

This section presents an overview of the Multiple-Operator Self-Exclusion Scheme. In the first instance, a theory of change is presented which is applicable to all gambling sectors. It shows our understanding of the inputs, activities, outputs and outcomes that Multi-Operator Self-Exclusion Schemes hope to generate. Next, we present the process map – also applicable to all gambling sectors – underpinning the activities depicted in the theory of change.

Multi-Operator Self-Exclusion Scheme Theory of Change

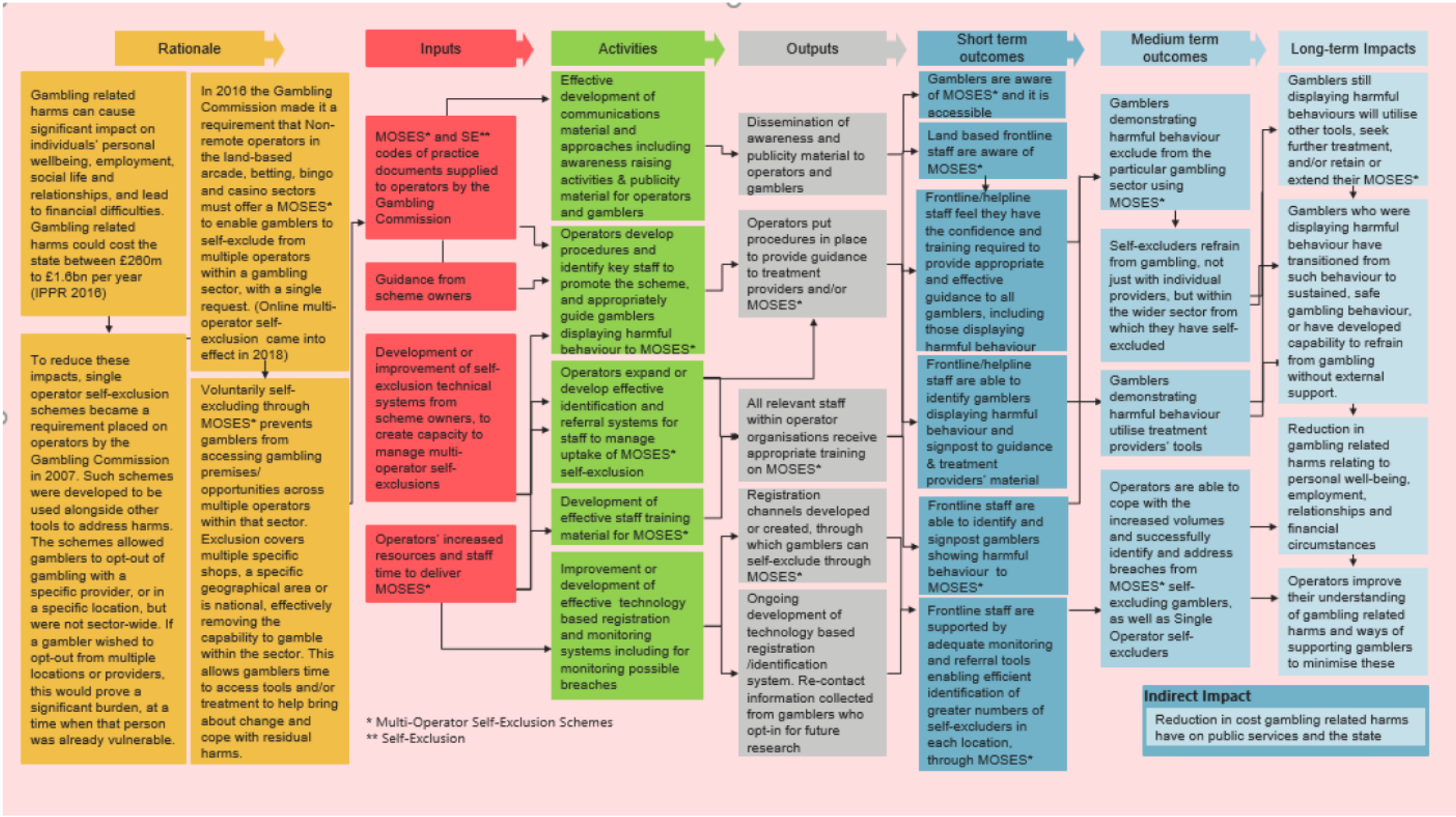
The overarching objective of self-exclusion schemes is to allow gamblers currently experiencing gambling-related harm to stop their gambling activities and to re-gain control over their gambling habits. This may happen either through the sole act of self-exclusion; or by consolidating this action using additional blocking tools such as software or payment blocking and/or receiving gambling related treatments. As such, self-exclusion aims to be an effective harm-minimisation tool for individuals who have recognised that they have a problem with their gambling and have made a commitment to deal with it. The Multi-Operator Self-Exclusion Scheme model allows individuals to self-exclude from a number of operators they would like to be refused service by through a single registration process.

Ipsos MORI developed a theory of change of the Multi-Operator Self-Exclusion Schemes based on the information gathered through the familiarisation interviews, focus groups and documents review. This describes the causal links through which the Multi-Operator Self-Exclusion Schemes inputs and activities are anticipated to lead to target outputs, outcomes and impacts. Note that one theory of change applicable to all gambling sectors has been developed as it is assumed that the rationale for the Multi-Operator Self-Exclusion Schemes and the gambling related harms the schemes hope to minimise are similar across gambling sectors. Whilst the application and development of Multi-Operator Self-Exclusion Schemes varies across the different gambling sectors, the intended outcomes are the same.

The theory of change presented in Figure 3.1 shows our understanding of the causal mechanisms (explained below the figure), common to all gambling sectors, that are hoped to bring about the desired change amongst those harmed by gambling. The theory of change depicts the key desired short, medium and longer-term outcomes across operators, frontline staff and those experiencing gambling related harm, and the anticipated causal pathways to these resulting from activities and inputs brought about by MOSES.

It should be noted that this theory of change was reviewed at several points in the evaluation process by the six scheme providers, and given that it is a working model, we would expect it to be revisited and expanded as required to ensure relevance as the evaluation progresses during Phase 2.

Figure 3.1: **Theory of change for Multi-Operator Self-Exclusion Schemes**



Source: Ipsos MORI

Causal Mechanisms

Figure 3.2 outlines the steps which will be measured between the rationale for Multi-Operator Self-Exclusion Schemes and its impact. Below we highlight how the planned activities are expected to lead to the intended outcomes and impacts:

- By having a comprehensive set of policies, procedures and staff training in place, operators' frontline staff will be aware of their obligations in relation to Multi-Operator Self-Exclusion Schemes and suitably trained and confident to deliver on these.

- A communications strategy, including publicity material, will also help raise frontline staff's awareness of Multi-Operator Self-Exclusion Schemes, further contributing to enhanced confidence to provide appropriate and effective support to gamblers experiencing harm from their gambling. Furthermore, staff will be able to signpost those harmed by gambling to Multi-Operator Self-Exclusion Schemes.

- Making gamblers aware of Multi-Operator Self-Exclusion Schemes and the wider support available to them via the communications strategy and signposting from staff, will make gamblers more likely to take this up, leading to their decision to self-exclude across multiple operators in a particular gambling sector.

- During the self-exclusion phase, it is hoped that Multi-Operator Self-Exclusion Schemes will facilitate gamblers to refrain from gambling activity in the sector from which they have self-excluded. They may also utilise other treatment provider tools in conjunction with this period. Abstinence, supported by self-exclusion, will enable gamblers to gain control of their gambling behaviour minimising any gambling related harms, including those related to personal well-being, employment, relationships and financial circumstances.

- Investment in appropriate systems for monitoring and tracking consumer activity will enable operators to successfully identify and address breaches from self-excluded gamblers. This will enable operators to improve their understanding of gambling related harms and ways of supporting gamblers displaying harmful behaviours to minimise these.

Assumptions

There are a number of key enablers necessary for the realisation of short and medium-term outcomes, some of which are common across the gambling sectors:

- Operators will be motivated to invest in appropriate policies, systems and procedures to implement Multi-Operator Self-Exclusion Scheme effectively.

- Gamblers who are displaying harmful behaviours will respond positively to sign-posting to Multi-Operator Self Exclusion Schemes and other support and be motivated to self-exclude.

- There is relevant and accessible support available, to which those experiencing gambling related harm can be sign-posted or referred.

- It will be possible for operators within each sector to share data with their scheme owners to facilitate the successful implementation of Multi-Operator Self-Exclusion Schemes.

- Multi-Operator Self-Exclusion Schemes will significantly reduce the capability to gamble within the sector from which the user has self-excluded.

Barriers

Lastly it is worth identifying some of the potential barriers to reaching the impacts highlighted in Figure 3.1 which will be explored through the evaluation. These include:

- Access to relevant training may not be engaging or accessible to operator staff.

- Lack of confidence of operator frontline staff in identifying and approaching individuals displaying problematic behaviours. This may also be a result of staff churn; more new staff would mean more people who are less experienced with identifying and approaching those displaying harmful behaviour.

- Consumers not taking up available treatment options.

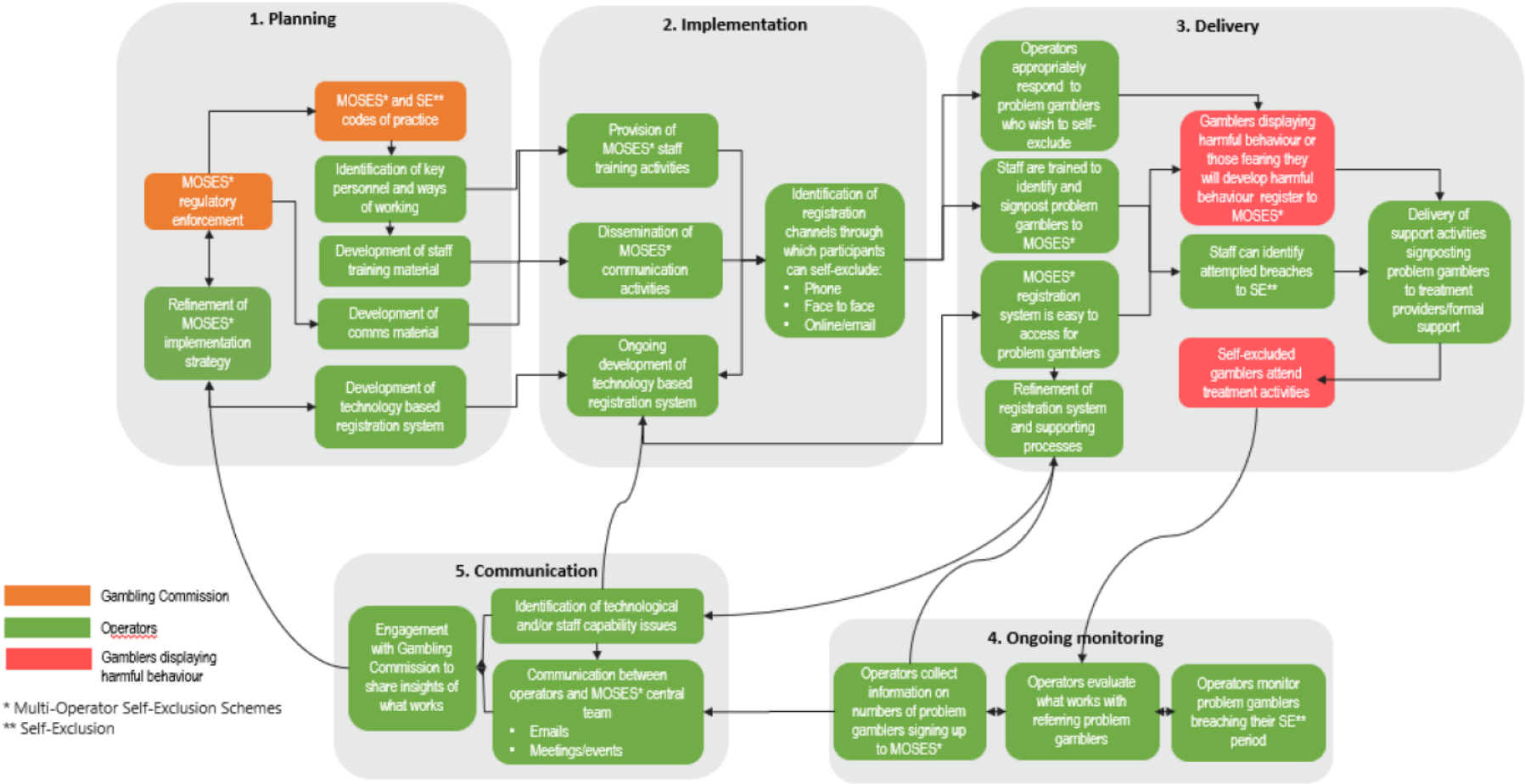
- Lack of ability by operator staff and/or technology to identify those who breach or attempt to breach their self-exclusion.

- Other influences may contribute to an individual's experience with Multi-Operator Self-Exclusion Schemes (e.g. family, friends, counselling, etc).

Multi-Operator Self-Exclusion Scheme Process Map

Ipsos MORI developed a process map describing key processes involved in the implementation and delivery of the schemes. This is based on the documents review, familiarisation interviews, the frontline staff focus group and the compliance officers' workshop.

Figure 3.2: **Process map for Multi-Operator Self-Exclusion Schemes**



Source: Ipsos MORI

4 Objectives and methodological approach

This section expands on the outline objectives listed in the introduction and the methodological approach that has been developed to answer the questions formulated around the objectives.

Objectives of the evaluation in detail

The full range of objectives and the questions drawn from these objectives are listed below. As previously stated, for completeness, the objectives outlined below are the intended aims for the full evaluation programme (including Phase 2). The number depicted after each objective indicates whether the objective is expected to be achieved in full at Phase 1 - (1) or partially at Phase 1 - (1/2) or during Phase 2 - (2)

Gamblers experiencing harms and users of self-exclusion schemes/Multi-Operator Self-Exclusion Schemes

- Determine the level of awareness of Multi-Operator Self-Exclusion Schemes and the operators' own self-exclusion schemes (1);
- Explore perceptions around these schemes (1);
- Determine how easy or difficult gamblers and users of self-exclusion schemes and Multi-Operator Self-Exclusion Schemes found the system registration process, including channels of registration (e.g. online, telephone, face to face) and clarity of terms and conditions (1);
- Ascertain the effectiveness of self-exclusion schemes/Multi-Operator Self-Exclusion Schemes as a harm minimisation tool:
  - Are self-exclusion schemes complementing each other? (1/2);
  - Is one scheme more effective than others, and if so, what are the learnings from this? (1/2);
  - Is there a cumulative impact of being registered to more than one self-exclusion scheme? (1/2);
  - Are they promoted effectively so that those that would benefit from the schemes are aware of them as a harm minimisation tool? (1);
  - Is the registration process clear and straight forward for those signing up to the scheme? (1);
  - What barriers may prevent someone from self-excluding (1);
  - Does self-excluding prompt further harm minimisation actions to address gambling behaviours, and vice-versa. For example, accessing formal support such as treatment programmes as a result of self-exclusion, or accessing treatment and taking action to self-exclude as a result. (1/2).

- Identify possible improvements to each of the five schemes, specifically around:
  - The registration processes (1);
  - Prevention of breaches to the self-exclusion period (1);
  - Signposting of self-excluded gamblers to treatment providers (1).
- Do the schemes stop or limit gambling by effectively identifying and preventing them from doing so? (1/2).

Operators and frontline staff within each sector

- Effectiveness of the staff training activities in relation to:
  - Staff's ability to identify gamblers displaying harmful behaviour (1/2);
  - Staff's ability to effectively signpost gamblers displaying harmful behaviour to self-exclusion, informing them of the terms and conditions (1/2); and
  - Staff's ability to recognise self-excluded gamblers (1/2).
- Assess the effectiveness of Multi-Operator Self-Exclusion Schemes, self-exclusion communication activities and marketing material to inform gamblers of the schemes (1/2);
- Establish whether staff are supported by appropriate self-exclusion identification systems e.g. application of digital or analogue systems identifying and cataloguing self-excluded gamblers (1/2);
- Ascertain the level and extent of monitoring information collected that supports staff in registering gamblers displaying harmful behaviour, and/or identify those who attempt to breach their self-exclusion period (1/2).

Multi-Operator Self-Exclusion Scheme owners by sector / Gambling Commission

- Determine the effectiveness of current communication methods between Multi-Operator Self-Exclusion Scheme owners and operators, specifically in relation to:
  - The registration processes (1);
  - The communication processes between Multi-Operator Self-Exclusion Schemes owners and operators around registration, notifications and breaches (1);
  - Do operators effectively communicate progress, barriers or key enablers to Multi-Operator Self-Exclusion Schemes to central staff who are implementing Multi-Operator Self-Exclusion Schemes? (1/2);

- Do staff responsible for delivering Multi-Operator Self-Exclusion Schemes consider the feedback and suggest refinements to the Multi-Operator Self-Exclusion Schemes implementing strategy and the gambling regulatory requirements to the Gambling Commission? (2);
- Identify any barriers to completing a registration with gamblers who contact Multi-Operator Self-Exclusion Schemes (1);
- Assess uptake of offer of treatments or formal support for self-excluded gamblers (1/2); and
- To test feasibility of collecting a contact sample from those who have chosen to self-exclude (1).

Overview of the evaluation methodology

The table below summarises the methodological approach which has been undertaken to deliver this evaluation and answer the objectives listed. The primary data collection took place between January 2019 and December 2019. A technical report detailing the data collection methods, response rates and the evaluation and research tools is appended to this report.

Table 4.1: Summary of the Methodological Approach

Method	Rationale
1 x familiarisation interview with each of the 6 scheme owners across sectors 2 x follow up interviews with each scheme owner to discuss the TOC 1 x final interview with each scheme owner to plug knowledge gaps	The initial interviews were to gain a better understanding of the processes underpinning the Multi-Operator Self-Exclusion Schemes implementation. The barriers for self-exclusion, context for this evaluation and to determine the feasibility of using contact sample of self-excluders. The follow up interviews were specifically to consult with scheme providers on the content of the Theory of Change. To make subsequent adaptations following initial interviews with frontline staff and Compliance officers. The final interviews with scheme owners happened post-fieldwork and they were undertaken to address points from findings which required further clarification.
2 x familiarisation interviews with treatment providers and 2 x academics	To gain a clearer understanding of the journey gamblers experiencing harm from their gambling go through, ultimately leading them to self-exclude. These interviews also provided insight around the ethics and best ways to approach the subject with gamblers experiencing harm.
1 x extended focus group was carried out with 14 frontline staff working in gambling premises across the land-based gambling sectors	To gain a better understanding of the day-to-day working of the Multi-Operator Self-Exclusion Schemes, and perceptions from staff on the take-up, success and limitations.

1 x workshop with 19 operators' compliance officers across gambling sectors, including the remote gambling sector	To gain a better understanding of the ideas and principles guiding the implementation of Multi-Operator Self-Exclusion Schemes, including the dissemination of information and training to staff, mechanisms for signposting gamblers experiencing harm to Multi-Operator Self-Exclusion Schemes, and enablers and barriers to the consistent execution of processes supporting the Multi-Operator Self-Exclusion Schemes and satisfied customers.
Document and dataset review (GambleAware, the Gambling Commission and Adrian Parke our academic partner suggested relevant documents and datasets)	To aid the development of the conceptual framework and to provide context for this evaluation.
A telephone survey of 1,500 interviews with the general public, with a boost of gamblers[15]	To gather evidence on general public and gambler awareness of self-exclusions schemes, and some top-level attitudes and perceptions. The re-contact sample was also used to recruit gamblers to take part in online focus groups.
5 x online focus groups with gamblers in each sector	To explore in further depth awareness and attitudes towards multi operator schemes amongst gamblers in each sector. This sample did not include those that had taken part in a multi-operator scheme.
42 x depth interviews with scheme users	To gather qualitative evidence from users of the five schemes on the effectiveness of the schemes, and some early evidence of impact.

[15] 1,500 UK adults aged 18+. Within this, 1,000 of those interviewed were gamblers, and 500 non-gamblers. This approach was chosen to ensure that statistical sub-group analysis could be done within the gambler sample population, while still being able to assess a flavour of the wider general public perceptions at an overall level.

5 Planning activities

In planning the implementation of Multiple-Operator Self-Exclusion Schemes, operators need to develop staff training and promotional material, develop an appropriate identification system and identify internal ways of working. These developments need to be considered in relation to the regulatory system for self-exclusion as detailed in the Licence Conditions and Codes of Practice (LCCP).

Context

The single-operator self-exclusion schemes which preceded Multiple-Operator Self-Exclusion Schemes varied in their sophistication and application. Different sectors therefore had different existing capacity for self-exclusion from which to build in order to implement a Multiple-Operator Self-Exclusion Scheme.

The different sectors are at different stages of development of Multiple-Operator Self-Exclusion Schemes therefore impact may be seen comparatively sooner for some sectors. The Casino sector was the first to launch their scheme in August 2015, and all of the non-remote self-exclusion schemes were developed by April 2016. Although GAMSTOP, the online Multi-Operator Self-Exclusion Scheme, decided to begin a soft launch in April 2018, at the time of undertaking this evaluation it was not a licence condition for all operators to participate.

Development of technology-based registration and identification systems

There is a base assumption that operators will be motivated to invest in appropriate policies, systems and procedures to implement Multiple-Operator Self-Exclusion Schemes effectively and indeed the interviews with the scheme providers, and operator staff reflect this. Operators accept that it is the right thing to do, and whilst there is a cost associated with the training and an administrative burden on employees, at a human level they do not want to see their customers getting into difficulty.

Gambling sectors have different operational models which impact how easy it is to implement their Multiple-Operator Self-Exclusion Schemes. These are summarised in the table below and then described in detail.

Table 5.1: Summary of Multiple-Operator Self-Exclusion Schemes by Sector

Sector	Bingo membership	Casino membership	Online	Bingo High Street	Arcades	Betting
Scheme provider	Retail Bingo Association	National Casino Forum*	GAMSTOP*	Smart Exclusion	Bacta	Senet Group*
Names of scheme	Bingo Industry Self-Exclusion Scheme	SENSE	GAMSTOP	Smart Exclusion	Bacta / Smart Exclusion	MOSES
Exclusion coverage	National Great Britain	National Great Britain	National Great Britain	Specific geographic coverage (1,000 metres) from 2 individual venues	Specific geographic coverage (1000 mtrs). Users can request more than one exclusion zone	Specific shops identified
Length of exclusion period available	12 months	6 months	6 months, 12 months or 5 years	12 months	6 months 12 months	12 months
Registration process	Application on the premises	Application on the premises	Online application with contact centre support	Application on the premises	Application on the premises or via a contact centre	Application via a contact centre
Renewal process	Expires after 6 months if no contact made post exclusion period. Face to face meeting required to reinstate even after the expiry period. Followed by a 24 hr cool off period	Face to face return to gambling meeting required to reinstate if before this expiry period followed by a 24 hr cool off period	Expiry date of 7 years if no contact made post exclusion period. Telephone interview required to reinstate before this expiry period		Expiry date of 2 years if no contact made post exclusion period. Face to face meeting required to reinstate if before this expiry period Followed by a 24 hr cool off period	Expires after 6 months if no contact made post exclusion period. Face to face meeting required to reinstate if before this expiry period

* At the time of fieldwork the Betting & Gaming Council had yet to be formed – which is the new trade body

**limited to operators who have signed up to the scheme

Bingo

The Bingo Association delivers a Multi-Operator Self Exclusion Scheme in dedicated bingo halls where an individual has to be a member in order to play Bingo. This membership model makes it easier to assess gambling behaviour and identify self-excluders attempting to breach, however not all operators have real time technology which will allow them to cross reference details, so an individual may swipe their membership card and gain access.

The Bingo Association is in the process of moving from a paper-based registration system to a tablet-based system. This will make the process quicker and ensure greater levels of accuracy as data will not have to be entered manually and the customer has greater involvement in the registration process. This transition has posed some challenges however in that some of the bingo venues did not have wi-fi. It should be noted that at the time of the Phase 1 evaluation this role out was not complete and therefore any impact will be assessed at Phase 2.

Some licensed bingo premises are much smaller than a traditional bingo hall and are based on the High street. Such venues do not typically have a membership system, so an individual can walk in off the street and play. The Multi-Operator Self-Exclusion Scheme for such operators is run by Smart Exclusion, and whilst the system to register is electronic, it is reliant on staff identifying customers from previously supplied photographs. This creates an additional challenge as this system requires staff to be provided with regular updates on self-excluders, know their customers and have a good memory for faces. This challenge is not limited to the bingo sector and exists for all sectors that do not require membership.

Casino

In order to sign up to SENSE, which is the casino industry Multiple-Operator Self-Exclusion Scheme, an individual must request a one-to-one meeting with a senior member of the team working within the casino. The individual is taken through the online registration process, which enables exclusion details to be cross referenced with the personal data which is currently held. An individual can request a national exclusion from all of the casinos in the country or specify venues or specific geographic coverage.

The majority of casinos operate on a membership system and so the administration and detection of individuals trying to breach their self-exclusion is straight forward. However, the larger casinos also operate a guest list which can delay the identification of an individual.

To support the identification process, some casinos operate facial recognition software, this is effective as the buildings generally have single entrances making it easier to regulate.

Online

To self-exclude online an individual can access the link to GAMSTOP through a remote operator or with GAMSTOP directly. As of April 2020, the service requires all operators, to sign up to the scheme as part of their licensing condition. Remote gambling is a technical challenge for the successful implementation of a Multiple-Operator Self-Exclusion Scheme. There are a significant number of operators using different operating systems and needing to connect with the central GAMSTOP database to get real time feedback on their customers.

This requires matching specific criteria provided by the individual with that held by GAMSTOP, so they acknowledge that the system is not full proof although enhanced verification requirements have been introduced with the intention of improving this aspect.[16]

"An individual can use different details - change their name for example to enable them to activate their account. It works for those who want it to work". (GAMSTOP scheme provider)

The present scheme operation requires the provision of a number of mandatory identifiers, with the option for users to voluntarily provide further information. GAMSTOP commented that the more mandatory information which is provided by the scheme user, the easier it is to identify breaches, but there is a balance between collecting sufficient data and putting an individual off the process because it is too onerous. Once registered a person can add further personal details via a user account facility but they cannot remove any information.

Arcade

An individual can sign up to the Arcade Multiple-Operator Self-Exclusion Scheme either in a venue or via a contact telephone centre. A person wishing to exclude from multiple operators will identify the venue or location (such as their home address) and they will be excluded from any arcades which are located within a 1km radius. There is acknowledgement that self-exclusion is a very personal conversation which should be handled discreetly, but an arcade may be single manned, and finding a space in a small venue for privacy may not be possible.

Detection of individuals trying to breach the system is a challenge for staff.

"It's workable but it's not perfect". For 99% of the operators it works well. The 1% are those dealing with a high number of self-excluders in their area, who struggle with the numbers." (Bacta representative)

Training is also perceived to be a challenge by the operators as coastal arcades are generally manned by transient or seasonal staff.

Betting shops

In order to sign up to MOSES which is the Multiple-Operator Self-Exclusion Scheme for betting shops, an individual has to make contact with a call centre and specify the shops from which they want to be excluded. Call centre staff can advise as to which shops are in the vicinity if an individual is unfamiliar with the area, although evidence from those who have signed up to the scheme suggests that this advice is not always provided. Whilst MOSES will accommodate requests for a significant amount of shops when this is necessary, this is rare, and individuals tend to self-exclude from shops which are local to their home, work or places where they visit most often.

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[16] http://www.gamblingcommission.gov.uk/news-action-and-statistics/News/new-age-and-identity-verification-rules-changes-to-the-lccp-from-tuesday-7-may

A photograph of the individual is sent to each of the betting shops specified, but as with other non-membership schemes there was an admission that the system was not full proof. Customer identification is reliant on regular internal staff updates of latest self-excluded customers, and staff's ability to remember faces and details of customers who self-excluded. Identification of self-excluded customers is harder in those premises which are responsible for a greater number of self-exclusions. This can occur because it is a popular shop or in a central area regularly named in the parameters of a multi operator self-exclusion agreement.

"Training can be fantastic, processes can all be in place but if you have 180 faces to flick through on an iPad and remember whilst working on a busy shop floor, it's always going to be almost impossible." (Frontline staff member, betting shop)

The implementation of the General Data Protection Regulation (GDPR) affects the collection, storage and monitoring of Multi-Operator Self-Exclusion Schemes related data. Although digital storage of photographs ensures only authorised individuals have access to scheme users' images, frontline staff said that being unable to display photographs of self-excluded individuals in back-room premises was a significant barrier, and having to scroll through photographs on a tablet was not as efficient and effective.

While technology such as facial recognition is improving, not all operators are confident in its ability to recognise self-excluders who are breaching. Representatives from the arcade and bingo sectors noted that having trialled 'passport style' facial recognition software in various premises, this form of monitoring breaches was unsuited to open premises, with multiple entry points. The recognition software was not always successful. It relies on an individual stopping at the entrance and looking into the camera without face coverings, no distinct changes in their appearance or the picture being distorted by sunlight. It should be noted that it was not evidenced in the interviews with self-excluders that having such software may act as a deterrent to those trying to breach, and could potentially be explored as part of Phase 2.

Preparedness of staff

By having a comprehensive set of policies, procedures and staff training in place, operators' frontline staff will be aware of their obligations in relation to the Multi-Operator Self-Exclusion Scheme and suitably trained and confident to deliver these.

A communications strategy, including publicity material, will also help raise frontline staff's awareness of Multi-Operator Self-Exclusion Schemes and contribute to enhanced confidence to provide appropriate and effective support to individuals who display harmful gambling behaviour. Furthermore, staff will be able to signpost such gamblers to Multi-Operator Self-Exclusion Schemes.

Guidance from scheme owners

Compliance officers within the schemes were consulted as part of this evaluation as they have an overview of the policies, procedures and staff training in place for individual operators. Frontline operators were consulted to provide a user's perspective.

Frontline staff in non-remote operators generally believe that the documentation and processes have improved since Multiple-Operator Self-Exclusion Schemes were first formed. There have been improvements made in training, and better equipment has been put in place to identify breaches.

In arcades, betting shops and casinos, guidance and best practice is cascaded from compliance teams to operations managers who then inform venue staff. The Bingo Association has standardised guidance which is sent direct to all retail bingo operators. Guidance is delivered in a variety of ways:

- By email (betting shops, casinos and arcades);
- Online training (casinos and betting shops); and
- Face-to-face training (casinos, bingo and betting shops).

All of the frontline staff who took part in the evaluation exercise placed great emphasis on training to ensure the implementation of the scheme was successful. In addition to a standardised training package on interventions, there was specific mention from the Bingo association and Bacta of the need to identify when a customer is showing signs of stress and spending more than they should before they identify themselves as wanting to take up self-exclusion.

"Staff aren't social workers or counsellors but are asked to do a lot of things associated with this so training is imperative. They need to be trained to have meaningful conversations" (Bacta compliance officer)

Within the bingo and arcade sectors it was felt that there is a better chance than most of being able to identify individuals in need of support because they are community-based activities and staff are more likely to know their customers well. A finding which was borne out when we talked with some individual scheme users from these sectors.

Membership-based sectors are also in an advantageous position as they can collect data on an individual to identify those displaying harmful behaviour. The Bingo Association has developed an app which provides insight on the frequency and time spent gambling by an individual. Casinos and online operators generate profiles of individuals demonstrating harmful behaviour through data tracking and developing algorithms based upon length of visit, frequency of visits and time spent on certain machines.

Frontline staff who took part in the evaluation were asked to consider whether there could be improvements made to the provision of guidance.

It was felt that decisions made at a strategic level within the sectors were very quickly cascaded down to the business which is then under pressure to ensure changes are being implemented at lower levels. There was mention of training conferences in city centres when changes are made, but people may miss such sessions or join just after they have taken place and so the responsibility is with the manager to plug any gaps in knowledge.

Those working in the bingo sector felt that their system works well and mentioned a constant auditing process and quick implementation of change.

Another challenge mentioned was a high staff turnover in the industry and so there was a constant need for training and development, particularly in betting shops where personnel have to visit stores to specifically train and retrain new starters to check they're up to date.

All sectors agreed that more training and guidance around the interaction with customers would be very useful,[17] particularly for younger, less confident or part-time staff. There was specific mention that live video examples of interactions with customers would be useful.

Frontline staff across the arcade, betting and bingo sectors felt that more guidance was needed on the differences between operator self-exclusion and Multiple-Operator Self-Exclusion Schemes.[18]

Identification of key personnel and ways of working

In order to provide effective advice and guidance to gamblers experiencing harm, frontline operator staff should be able to identify customers showing signs of gambling related distress, and be in a position to take decisions on whether to recommend self-exclusion as the most appropriate harm-minimisation tool for the customer. Subsequently, this needs to be followed by staff carrying out the actual registration to a self-exclusion scheme. Operators must establish ways of working for staff to handle and signpost customers to self-exclusion registration and be clear on responsibilities to do so.

Different sectors have different approaches. Whilst all members of staff are trained to understand the Multiple-Operator Self-Exclusion Scheme process, the arcade sector has a hierarchical process where frontline staff flag customers to their superior, explaining the signs that makes them think the person may have a gambling problem, to then the superior deciding the best course of action. The frontline staff interviewed believe that one person giving a clear message works well. Other sectors such as the betting sector take a more 'everybody's business' approach, but if staff have any issues this is fed back up the lines of responsibility.

Outcomes achieved

Short-Term

A short-term outcome associated with planning activity and identified in the theory of change, is that land-based frontline staff are aware of the Multiple-Operator Self-Exclusion Scheme for their sector. There is clear evidence that scheme providers are cascading policies, procedures and staff training to compliance officers to disseminate to operating staff. The frontline staff who engaged with this evaluation were aware of their

[17]Gambling Commission released Customer Interaction guidance on 31st July 2019. http://www.gamblingcommission.gov.uk/PDF/Customer-Interaction-Formal-Guidance-Non-Remote-July-2019.pdf (after fieldwork with these stakeholders).
This guidance is for Operators to support them in the development of their customers interaction policies and procedures

[18] Whilst staff did not specify who should provide such clarity, this should be the operators responsibility as they are responsible for their own self-exclusion schemes and how they integrate with the multi-operator one.

obligations in relation to Multiple-Operator Self-Exclusion Schemes, but there was concern that staff churn made dissemination of information a challenge.

Medium-Term

A medium-term outcome is that operators are able to cope with the increased volumes of excluders and successfully identify and address breaches from Multi-Operator Self-Exclusion Schemes. In order to assess this outcome, it will be necessary to witness an increase in volumes and to review breaching data alongside more qualitative or quantitative research with scheme providers and operators.

Long-Term

Operators improve their understanding of gambling related harms and ways of supporting gamblers to minimise these. This insight will be addressed at Phase 2 when sufficient time has elapsed to allow scheme providers to have undertaken more sophisticated analysis of their membership data.

Recommendations to support desired outcomes

Given the inherent challenges of identification of scheme users breaching their contracts in non-membership based venues, it would be prudent to assess whether account based play could be feasible across all gambling sectors.

The identification of key personnel and defined ways of working needs to be supported by clear guidance material for staff to refer to when facing a situation where they think they might have identified customers experiencing some level of gambling related harm.

The challenge of staff churn means operators must develop concise and practical material that staff can easily access when facing a situation where they think customers may benefit from self-exclusion or other harm minimisation tools or advice. Such guidance material must provide clear steps for staff to follow, and a summary of Multi-Operator Self-Exclusion Schemes key terms and conditions, if deciding to approach the customer to signpost them to Multi-Operator Self-Exclusion Schemes.

An audit of internal training and communication material across the sectors may prove beneficial to identify best practice examples.

Electronic means of communication is the most practical way in which to reach out to part-time staff and negate the need for multiple on-site visits to address new members of staff. Compulsory online orientation sessions and training may be accessed via smartphones[19] and downloadable podcasts from the Gambling Commission as an alternative to attendance at group events.

[19] 79% of UK adults aged 15+ years own a smartphone : Source Ipsos MORI Tech Tracker QTR 3 2019

6 Implementation activities

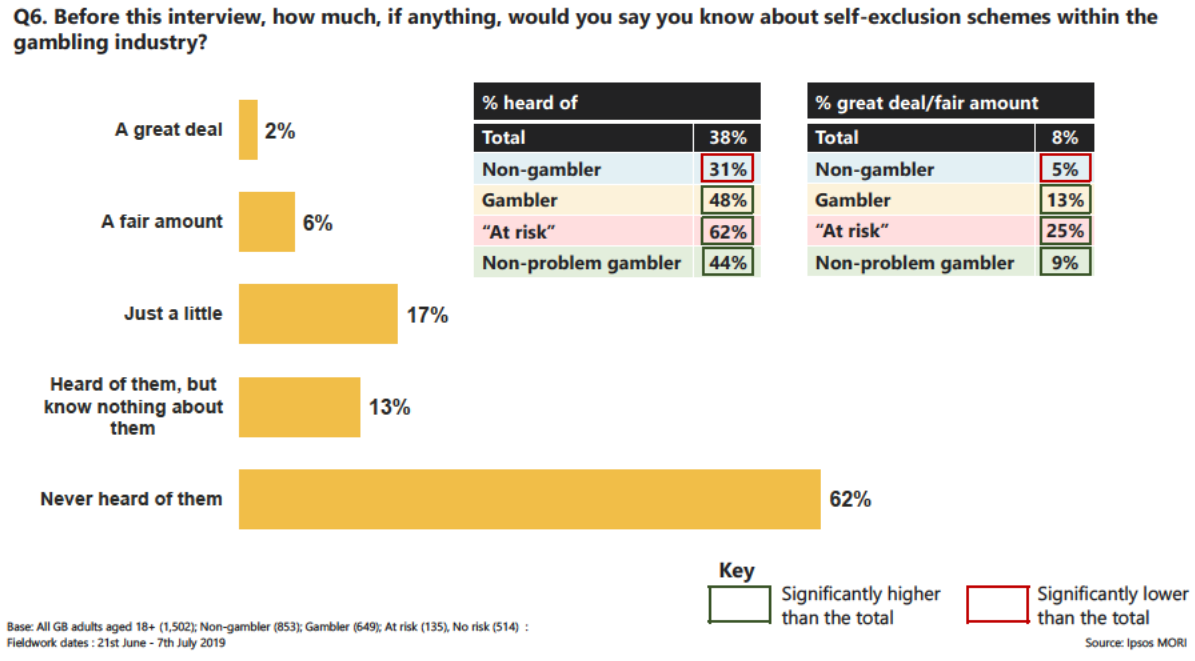
Multi-Operator Self-Exclusion implementation activities pertain to the actual administration of the schemes by each operator. It relates to the provision of staff training, dissemination of promotional activities and the identification of channels through which gamblers experiencing harm can self-exclude.

Awareness of self-exclusion schemes and Multi Operator Self-Exclusion Schemes

Public awareness of self-exclusion

- In our quantitative survey of the general public[20] we asked participants how much, if anything, they know about self-exclusion schemes within the gambling industry. While around two in five (38%) individuals have heard of self-exclusion, a much smaller proportion know "a great deal" or "a fair amount" about them (8%). Awareness rises to nearly half amongst those who gamble[21] (48%) and 13% of this audience know "a great deal" or "a fair amount" about self-exclusion schemes.

Figure 6.1: **General public awareness of self-exclusion schemes**



It is positive to note that those who are "at risk" - low risk gamblers (score of 1-2), moderate risk gamblers (score of 3-7), or problem gamblers (score of 8-27), as defined by their PGSI score,[22] are significantly more likely than average to have heard of self-exclusion (62% vs. 38% overall).

[20] Ipsos MORI Telephone Survey: UK adults aged 18+, base: 1,500 (1000 Gamblers and 500 Non-Gamblers), fieldwork conducted 21 June – 07 July 2019

[21] Defined as those who have taken part in at least one gambling activity in the past 12 months, excluding National Lottery or Scratch cards *only*

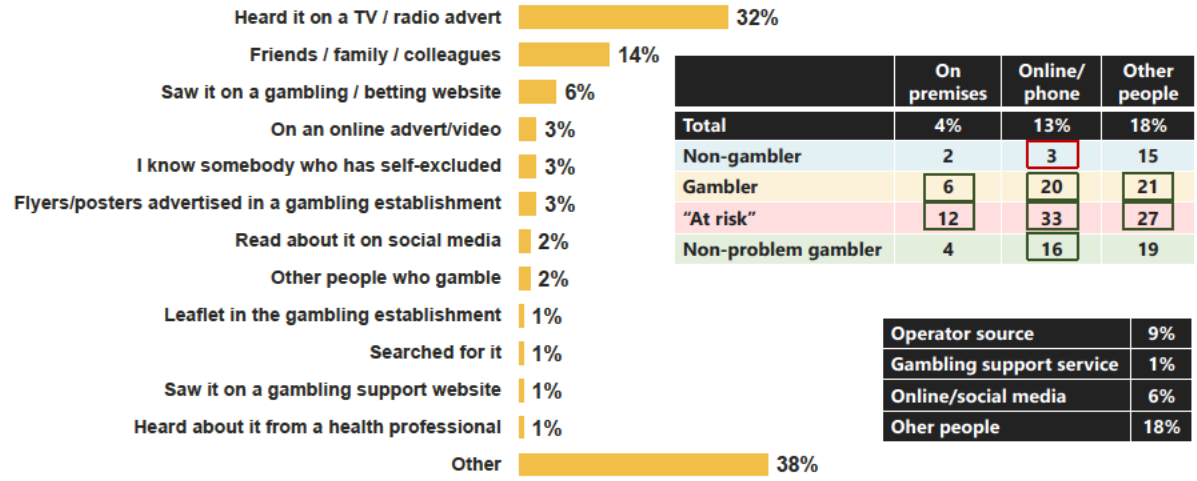
[22] Problem Gambling Severity Index, UK, Ferris, J, and Wynne, H. (2001).

- Within the gambling population, males are more likely than females to have heard of self-exclusion (56% of male gamblers vs. 39% of females), males are more likely to be classified as "at risk" gamblers on the PGSI. Gamblers who are in employment are also more likely to have heard of self-exclusion schemes (51% vs. 44% of those not working), even though there are no discernible differences in our study between the two in terms of those "at risk", suggesting there might be a gap in exposure amongst those not in employment.

- As shown in the figure below, those who had heard of self-exclusion were most likely to recall hearing about it on a TV or radio advert[23] (44%), while others were told about it by friends, family or colleagues (21%) or on a gambling website (6%). Very few had picked up this information from gambling premises (5%).

Figure 6.2: **Source of information about self-exclusion schemes**

Q7. How did you first hear or find out about self-exclusion schemes within the gambling industry?



	On premises	Online/ phone	Other people
Total	4%	13%	18%
Non-gambler	2	3	15
Gambler	6	20	21
"At risk"	12	33	27
Non-problem gambler	4	16	19

Operator source	9%
Gambling support service	1%
Online/social media	6%
Oher people	18%

Key: Significantly higher than the total; Significantly lower than the total

Base: All GB adults aged 18+ who have heard of self-exclusion (575) : Fieldwork dates : 21st June - 7th July 2019

Source: Ipsos MORI

- Older participants aged 55+ are more likely to have heard of self-exclusion through TV or a radio advert (47% vs. 32% overall). Those aged 25-34 are more likely to have received information through someone they know (26% vs. 14%) or read about it on social media (6% vs. 2%). "At risk" gamblers are more likely to have seen this information on premises (12% vs. 4% overall).

[23] There haven't been specific TV or radio adverts commissioned by schemes, however documentaries and news have mentioned self-exclusion

Figure 6.3: **Source of information by key demographic groups**

Q7. How did you first hear or find out about self-exclusion schemes within the gambling industry?

	Age						Region				Work status		PGSI score	
	18-24	25-34	35-54	55-64	65-74	75+	North	Mids/ Wales	South	Scot-land	Work-ing	Not work-ing	"At risk"	Non-prob-lem gamb-ler
Heard it on a TV / radio advert (32%)		19%		45%	50%		24%		40%				22%	
Friends / family / colleagues (14%)		26%		6%	7%				9%	29%	18%	7%	24%	
Saw it on a gambling / betting website (6%)					1%				3%		8%		18%	9%
On an online advert/video (3%)													7%	
I know somebody who has self-excluded (3%)														
Flyers/posters advertised in a gambling establishment (3%)				*%									8%	
Read about it on social media (2%)		6%						*%			3%			
Other people who gamble (2%)										11%				3%
Leaflet in the gambling establishment (1%)													6%	
Searched for it (1%)													3%	
Saw it on a gambling support website (1%)														
Heard about it from a health professional (1%)														

Base: All GB adults aged 18+ who have heard of self-exclusion (575) :
Fieldwork dates : 21st June - 7th July 2019

Green shading denotes a proportion which is significantly higher than the average
Red shading denotes a proportion which is significantly lower than the average

Source: Ipsos MORI

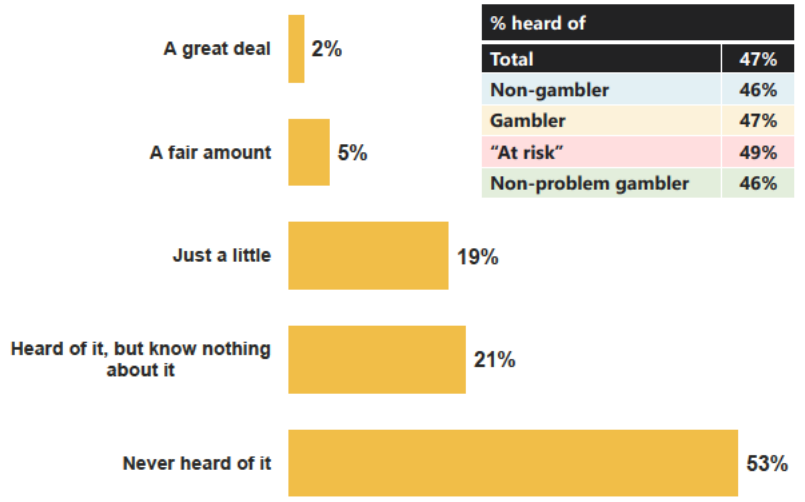
Participants who had heard of self-exclusion were also asked if they had heard of Multi Operator Self-Exclusion Schemes, with just under half (47%) of this group saying they had. **This equates to 18% awareness amongst the general public overall** (the total sample including those who had not heard of self-exclusion).

- Once again, there appears to be a lack of depth of knowledge, with just 7% saying they know "a great deal" or "a fair amount", dropping to 2% amongst to the total sample.

Notably, there are no real discernible sub-group differences when it comes to awareness of Multi Operator Self-Exclusion, including amongst gamblers who are "at risk".

Figure 6.4: **Awareness of Multiple-Operator Self-Exclusion Scheme**

Q10. Before this interview, how much, if anything, would you say you know about the Multi Operator Self Exclusion Schemes such as SENSE or GAMSTOP?



% heard of	
Total	47%
Non-gambler	46%
Gambler	47%
"At risk"	49%
Non-problem gambler	46%

% great deal/fair amount	
Total	7%
Non-gambler	4%
Gambler	8%
"At risk"	15%
Non-problem gambler	6%

18% of total sample have heard of it

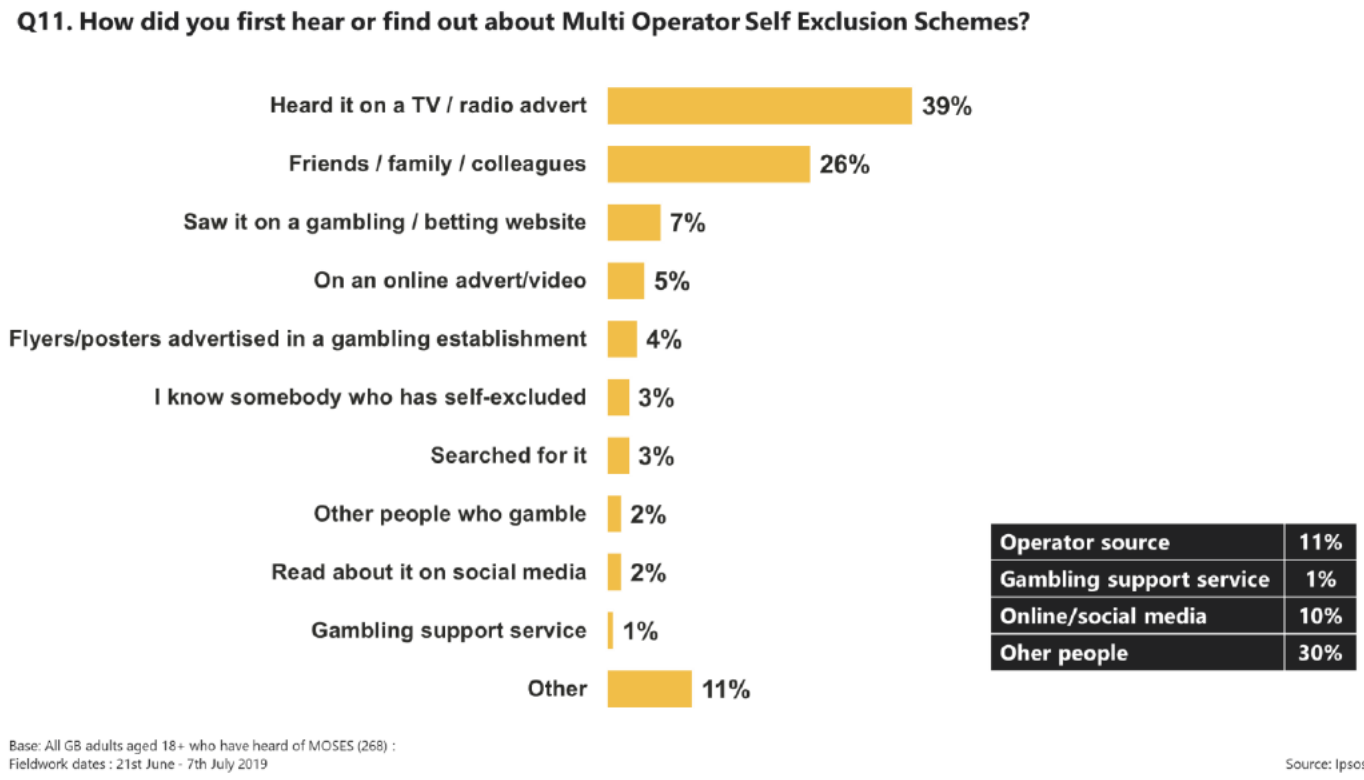
Key: Significantly higher than the total

Base: All GB adults aged 18+ who have heard of self-exclusion (575) :
Fieldwork dates : 21st June - 7th July 2019

Source: Ipsos MORI

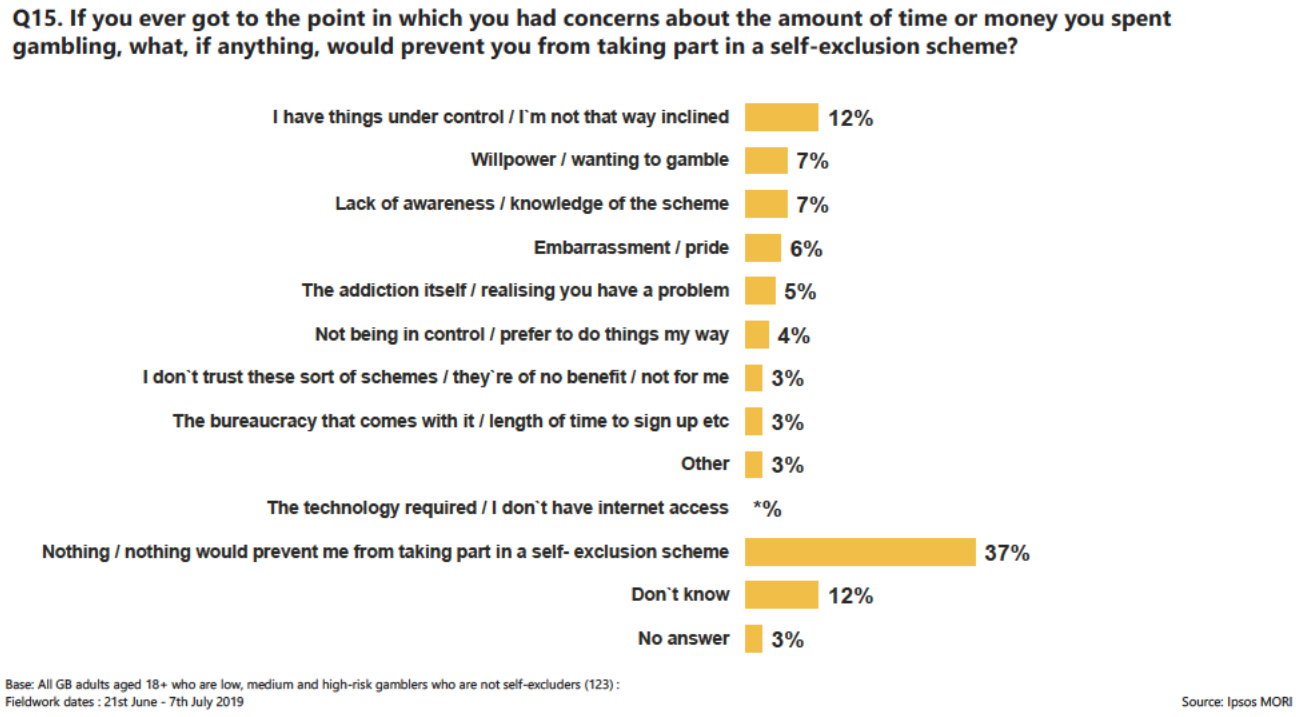
- Those who had heard of Multi Operator Self-Exclusion Schemes recognised them based on similar channels to that of self-exclusion generally; through TV/radio (39%), or through people they know (26%). Again, awareness through the operators themselves was low, with just 7% seeing it on a gambling website and 4% through materials on premises.

Figure 6.5: **Sources of information about Multiple-Operator Self-Exclusion Schemes**



Participants were also asked to state, in their own words, what might prevent them from taking part in a self-exclusion scheme. As shown in the figure below, a "lack of awareness or knowledge of the scheme" is one of the top reasons given as a potential barrier (7%). This question was only asked of "at risk" gamblers, therefore people who might benefit most from taking part in Multi Operator Self-Exclusion Schemes.

Figure 6.6: **Barriers to self-exclusion**



Gamblers' awareness of Multi Operator Self-Exclusion Schemes

Our quantitative survey of the general public shows that there is relatively low awareness of Multi Operator Self-Exclusion Schemes, even amongst those who are experiencing some level of harm in terms of their gambling behaviour.

Discussion groups with gamblers were conducted to explore awareness around self-exclusion, including Multiple-Operator Self-Exclusion Schemes, and what the perceived barriers to joining the schemes might be. We also looked at levels of understanding of how the schemes worked, and the distinction between Multi-Operator and Single-Operator Schemes.

While many gamblers had at least heard of self-exclusion, very few were able to accurately explain the logistics of how schemes worked, or the specific details. Others appeared to categorise it amongst other harm-minimisation tools such as limit setting, timeouts or blocking. Some had not come across self-exclusion despite gambling regularly for many years. Although it is important to note that this sample had a mix of gamblers including some whose PGSI score indicated that they were not eliciting harm as a result of gambling.

> ***"If you self-exclude online there's no way back – you do it for 90 days and that's it. Nothing like that exists for shops." (Male, Betting shop gambler).***[24]

[24] This quote, as throughout, is a direct verbatim from a research participant, based on their own perceptions. We recognise that these perceptions may not always represent factual truth, but they serve to show the extent of participant understanding of the schemes.

"I had never heard of it and I have been playing bingo for 20 years." (Female, Bingo gambler).

While personal experience of self-exclusion appeared to be limited, a number of participants did mention that they knew of friends or family that had self-excluded.

"A friend of mine had to set himself up for the roulettes." (Male, Betting shop gambler).

There appeared to be even lower awareness of Multi Operator Self-Exclusion Schemes amongst online focus group participants, with only a handful alluding to it unprompted. When asked if they knew any names of Multi Operator Self-Exclusion Schemes, only one participant named a specific scheme (GAMSTOP), and even those who had taken part in single operator self-exclusion weren't aware of the schemes and appeared more likely to think the schemes were run by other organisations such as "Gamban" or "GambleAware". After introducing the concept, there was certainly some confusion about the distinction between single-operator and multi-operator schemes, which was reflected within the scheme user interviews (as referenced in the delivery section).[25]

"Assuming you'd be excluded from all accounts but that's just an assumption". (Male, Betting shop gambler)

"I know very little other than it excludes you across a number of platforms in one hit." (Female, Betting shop gambler).

Scheme-users' introduction to Multiple-Operator Self-Exclusion Schemes

Scheme users in the qualitative research were also asked about how they came to be aware of Multi Operator Self-Exclusion Schemes. In many cases, scheme users either proactively sought out a way to self-exclude, or it was recommended to them by a concerned family member or friend. The catalyst that culminated in them seeking out a means to stop their gambling was often a "crisis point", such as losing a lot of money or winning a lot of money, or a fear of losing a house or a partner and from that point not being able to stop gambling. A few participants found out about it through other help they were getting (such as GamCare, Gamblers Anonymous, or a counsellor). In more cases than not, gamblers sought out self-exclusion themselves as opposed to intervention from operator staff.

[25] See page 54

"My partner, she finds this. She says there's the option to go for the self-exclusion because it's better because they help you. You go to the customer service... She found it on the Internet." (Male, 22, Bacta).

"I'd, kind of, seen it out of the corner of my eyes [in a betting shop], as you would when you think about it. And then, of course, my counsellor that I did go to with GamCare, he suggested all this as well." (Male, 43, MOSES).

In cases where scheme users had been approached by operator staff, it was usually when they had a pre-existing relationship with an individual staff member who was able to approach them and suggest it might be a good idea to self-exclude.

"People in the bookies who worked there knew I had a problem, and just came up to me [and said] 'You need to stop.' [...] I think they just saw, you know, if I'd won a high amount, they saw me putting it back in. Because I got quite friendly with them, they said, you know, 'Pack it in. You can't control it.'" (Male, 38, MOSES, Bacta, GAMSTOP).

"It was to do with the leaflets and also obviously the staff that I, you know, had a rapport with. And they said 'look, you can self-exclude yourself' and at the time I didn't realise, though I'd seen the leaflets I didn't really understand it much." (Female, 33, Bacta).

For many though, it was a case of approaching staff and enquiring about self-exclusion. There was very little to suggest that this had been prompted by visible promotional material.

"They have about three leaflets in a little thing saying, 'GamCare'. Or they have a poster, 'Keep your gambling in control'. That's it." (Female, 42, GAMSTOP, MOSES).

Amongst those who had self-excluded from online gambling, a common pathway to finding this option was conducting an internet search, either themselves, or via a friend or family member who then relayed the information to them. Others registered with GAMSTOP only after finding out about it following Multiple Single Operator Self-Exclusion Schemes. Some users felt that GAMSTOP wasn't particularly well advertised given they had self-excluded online and not come across it.[26]

[26] Note at the point of interview GAMSTOP was not a licensing condition for online operators and therefore the scheme had only had a 'soft launch'

"I found out about GAMSTOP which I kind of wish I had found out about that a long time ago, although I don't think it's that old but I just didn't feel it was that well-advertised either unless you look for it. [To find it I] probably just googled problem gambling or something like that." (Male, 36, GAMSTOP).

Communication materials / marketing of Multi Operator Self-Exclusion Schemes

The evaluation research also explored each sector's marketing and promotion materials specifically relating to Multi Operator Self-Exclusion Schemes, and how this was perceived and used by customers.

The operators' perspective

In the workshop with operators, staff were asked to describe their approach to the marketing of Multi Operator Self-Exclusion Schemes.

It was apparent that each sector had its own approach to marketing self-exclusion, with sectors usually having their own slogans or branding for self-exclusion and Multiple-Operator Self-Exclusion Schemes. On premises, information provided about Multi Operator Self-Exclusion Schemes formed part of more generic materials that operators provided around problem gambling, such as leaflets about staying in control or support organisations.

There were mixed views on how visible materials were in land-based premises. Betting shop frontline staff tended to feel that their yellow leaflet was quite prominent and carefully placed in areas where they might be noticed, for example in machine dispensers, or in more discreet places such as toilets where gamblers might pause to reflect. Other premises, such as arcades and casinos, felt that materials specific to Multi Operator Self-Exclusion Schemes weren't particularly visible compared to more general support leaflets such as links to GamCare or GambleAware.

Scheme users' views of the scheme publicity materials

There were some instances where scheme users reported being made aware of Multi Operator Self-Exclusion Schemes thanks to the marketing materials provided by schemes and displayed by operators. The most recognisable materials in terms of branding appeared to be the yellow MOSES leaflet – which was mentioned on a few occasions as a source of awareness amongst scheme users. Generally, however, gamblers did not feel that there was particularly visible promotion of the schemes within gambling premises.

General gamblers' views of the scheme publicity materials

Ipsos MORI used the discussion groups with gamblers who were not scheme users as a platform to explore recognition of materials and general gamblers' awareness of scheme promotion by scheme operators, and how these might be improved. Recognition of materials and awareness of schemes was low amongst this group. Few felt that operators were meeting obligations to make gamblers aware of the schemes, and many suggested improvements to both materials and their promotion by scheme operators. Further detail for each scheme is provided below.

MOSES

In the betting shop discussion group, when shown the MOSES leaflet there was no recognition. Most felt the information was clear and they were able to relay information about the scheme to the group from a brief reading of the materials. There were also comments that the leaflet stood out because of the colours, though the low recognition among this group of (sometimes occasional) betting shop users suggests the leaflet might not stand out very well in the premises. One participant suggested that printing details on the back of betting slips would be more effective than a separate leaflet:

"Get bookies to print these details on the back of the betting slips they give to customers, then everyone will read it." (Male, Betting shop gambler).

Gamblers who frequented betting shops were asked if they felt the scheme operators were meeting obligations to promote MOSES. One view was that schemes were doing the bare minimum to promote the scheme, while another felt that self-exclusion information, if available, was lost in the high volume of general gambling awareness advertising.

"[MOSES is being promoted] probably to the letter of the law – in reality, the least they can get away with." (Female, Betting shop gambler).

"There are loads of GambleAware ads, that's not the problem, but that isn't self-exclusion." (Male, Betting shop gambler).

GAMSTOP

A few online gambling group participants recognised the GAMSTOP materials. One from discussion on the radio the previous week, rather than from activity online. There was general agreement that the material is clear and effective, and most participants picked up important points about the scheme from briefly viewing the materials.

Participants did not generally seem to feel that information about GAMSTOP was readily available. Some felt this varied by operator, whilst others thought it was not advertised enough. There were comments that more publicity was needed, and others felt that bigger, 'government driven', advertising campaigns were needed to raise awareness.

"It needs more publicity." (Male, Online gambler).

"I think it is in early days - as more sites come on board I think it will get more exposure." (Male, Online gambler).

"I hadn't heard of it in depth before, it's not advertised much?" (Female, Online gambler).

Bacta

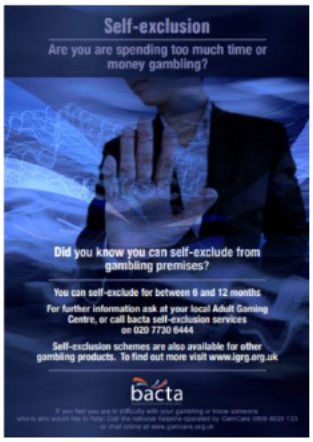
There was no recognition of the Bacta information leaflet, or the self-exclusion scheme itself. Group participants who gamble in arcades were divided in opinion on the materials. Some felt it was clear and easy to understand, although a little wordy. Others felt that it wasn't direct enough and might not hit its intended audience (those harmed by gambling) because this audience wouldn't necessarily proactively engage with posters. When asked to recall details of the scheme from a brief viewing of the materials, most were able to recall that there was a number to call but they felt this information should be more directly presented.

"Very confusing and again you need to accept you have a problem first." (Male, Arcade gambler).

Most felt that the operators were not meeting their obligation to make gamblers aware of the scheme. They felt that the operators were not particularly proactive and there was a sense that if obligations were being met, this was at a 'bare minimum' level.

"I have never seen any information in arcades about issues with gambling/self-exclusion." (Male, Arcade gambler).

"I think pretty much all the arcades I frequent have posters displayed (though different to the one linked) plus stickers on the machines, but none of them are screamingly obvious, it's like they are fulfilling some minimum obligation, but don't really want to draw your attention to it, as obviously it hurts their profits if you do." (Male, Arcade gambler).



Bingo Industry Association Self-Exclusion

There was no recognition of the 'Keep it Fun' leaflet shown to the group of participants who frequent retail Bingo. Though participants felt that the advice was clear, easy to understand, and pitched appropriately. It should be noted that the material shown was a leaflet made by Mecca Bingo, but does reference the Bingo Industry Self Exclusion Scheme.

"It's very well written. not condescending, quite clear." (Female, Bingo gambler).

"It's good simple advice." (Female, Bingo gambler).

Some felt the leaflet might be a little lengthy for people to digest. Suggestions for improvement included:

- Bullet points, to make information easier to digest;
- Helpline and contact information bold and at the top;
- Making the most important information the most visible;

There was general agreement that the scheme needs to be better publicised, because 'everybody should be aware'. Participants felt that the lack of awareness in the group demonstrated that obligations to make gamblers aware of the scheme were not being met. If leaflets are being displayed, these displays are not sufficiently prominent.

SENSE

There was no recognition of SENSE scheme materials amongst participants from the casino gamblers' group. On a brief viewing of the information, participants expressed concerns that there was too much information, that the materials could be more to the point and more digestible at the point of provision.

"I think I'd pick that up and try reading it later. I'm interested by stuff like this." (Male, Casino gambler).

"Need more succinct info for a toilet poster or to grab attention." (Male, Casino gambler).

"I wouldn't read it there and then, but I'd probably take it home and read it the next day." (Female, Casino gambler).

Participants did not seem to think information on self-exclusion or other ways of getting help was readily available in Casinos. Participants felt that this information would be helpful, suggesting that leaflets or posters in the toilets would be useful to people, as they could discretely take down details. Some said it should be mandatory for operators to provide information about the scheme at the point of casino membership sign-up.

The role of operator staff in raising awareness

The evaluation also explored the role of operator staff in effective promotion of Multi Operator Self-Exclusion Schemes for those who might need it, and their perception of staff confidence in approaching people.

In the discussion groups with gamblers, participants were asked about operator staff and how helpful they were in terms of guiding gamblers towards support.

Some gamblers voiced that they had good friendly relationships with operator staff - this tended to be in retail bingo and arcade establishments. There was a perception amongst general gamblers that it was not really the duty of operators to signpost people to support or tools like self-exclusion. Some felt that staff should not have

this responsibility, either because they saw it as the responsibility of the individual, or because they felt it was too difficult for the operators to know what constituted a gambler displaying harmful behaviours at their level of training or job grade. They understood the transient nature of the job and the difficulty of the logistics involved in training part-time staff.

"They have too much of a high turnover of staff to train them up like that...too expensive." (Female, Arcade gambler).

Others felt that they should show more professionalism in exercising their duty of care, and while there was a recognition that staff were not counsellors, they did think that staff should be more adequately trained to police irresponsible behaviour and stop people from harmful gambling by recognising the signs. Equally there was some scepticism among gamblers about operators' motivations to help those who are gambling unhealthy amounts of money. It was felt they were essentially there to facilitate gambling to help the success of the business and this took precedence over gambling safety.

"No disrespect but some of the ones I've seen are not the most professional looking bunch...I'm sure they have the information, but I don't think the ones who work behind counters are the ones I would want to talk to." (Female, Betting shop gambler).

"I think it should be their duty. But I wouldn't trust them to do it" (Male, Casino gambler).

"Shop managers have targets to meet so putting off a punter isn't realistically going to happen" (Male, Betting Shop Gambler).

There was, however, also some mention that it might be difficult to approach someone who is presenting with issues related to gambling-related harm, particularly if they are showing signs of distress or anger, and that ultimately some responsibility also lies with the gambler to control their own behaviour.

"You try and approach somebody who's getting angry, with a GamCare leaflet, it doesn't happen." (Female, Betting shop gambler).

Scheme user experience of staff support

Scheme users were also asked about their experiences of staff support, particularly when enquiring about self-exclusion. Generally, many scheme users found staff to be helpful particularly when they already had a good established relationship with them and when they felt staff were acting in their best interests and supportive of the decision. In many cases, to avoid any possible embarrassment or stigma, scheme users would take the decision to register to a Multi Operator Self-Exclusion Scheme from a premises that they were familiar with, or felt comfortable in, as opposed to going somewhere new.

Scheme users tended to feel positive when they had visited premises that offered private conversations to talk through the possible options, and when their need for help was taken seriously by the staff.

"Because I've got to know them anyway, they were really supportive over it. And I do see them occasionally when I'm walking down the high-street, and they ask me how I'm doing, and I say, 'Oh yes, I'm alright. I'm a lot better now I'm not doing it." (Male, 23, Bacta).

"When I excluded from the local shop, they mentioned MOSES. They said it's better than self-exclusion, gave me their number and said we recommend you do that instead." (Male, 34, SENSE, MOSES, GAMSTOP).

While many of the scheme users did receive sign-posting to gambling support services from staff, not all did. There was a general feeling that staff fulfil their minimum duties rather than ensuring that gamblers are supported to avoid harm.

"There's no support at all. They don't say that there's GamCare, or all the services are out there, or Money Matters. They just do nothing. They just, like, want you to sign that form and get out." (Female, 42, MOSES, GAMSTOP).

Examples given where staff were not helpful tended to have a detrimental effect – particularly when the staff were deemed to be unfriendly and not forthcoming with their support. For many of the scheme users who took part in the evaluation, it was seen to be a big moment for them personally in actually taking the decision to seek help, and therefore they needed staff to be helpful, supportive and discreet at the point they enquired about self-exclusion. While there was some positive evidence of this, generally the research suggests that the quality of staff interactions can be wide-ranging and in instances where scheme users have had bad experiences, it can have a negative effect on their perception of self-exclusion.

"There's no look of respect, it's the kind of, 'Oh, okay'... they don't come across as approachable and they don't really make it discreet, so, they contact the manager over the phone and they say, 'Oh, hi, yes, there's a customer that wants to sign up for SENSE." (Male, 32, SENSE).

Some participants also felt that Multi Operator Self-Exclusion wasn't promoted to them when it should have been. For example, one participant mentioned that he made 20 calls to self-exclude from individual operators, yet it was never suggested to him that he might benefit from a Multiple-Operator Self-Exclusion Scheme.

Many participants who took part in one Multi Operator Self-Exclusion scheme also had pre-existing gambling-related problems in other sectors. These participants felt there was no real evidence of cross-promotion of other Multi Operator Self-Exclusion schemes from operator staff and for some scheme users this may have been beneficial, particularly those who were addicted to a type of play that could also be accessed via another sector (e.g. poker can be played in a casino and online). There was evidence of a desire for this cross-promotion of different schemes available and indeed as detailed in the next section, a wish that there was a cross-sector Multiple-Operator Self-Exclusion Scheme.

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"There's an exclusion for online, arcades, bookmakers as well - I wasn't aware of any of those, just that SENSE really... It was just the land-based casinos, then it didn't really help, but I think, if it was an all-in-one self-exclusion from all sorts of gambling within the UK, then that would help much, much better." (Male, 31, SENSE).

Staff training / confidence in approaching customers

In the workshops with operator staff, those working in land-based premises were asked to give examples of how staff were trained in relation to identifying those eliciting potential harm.

Generally, operator participants communicated that all staff were trained to a basic level in terms of spotting gambling-related harm, but there was an admission amongst some that it can sometimes be difficult to have a conversation with individuals. There was also a consensus amongst frontline staff that there isn't a "one size fits all" approach to training staff to engage with gamblers, because of the different situations that people find themselves in. For example, it was felt that while some customers may usually be in control, they could have a particularly bad day (perhaps for other reasons) and it might not always be appropriate to approach them. Some staff felt they would not always want to approach customers because of the risk of aggravating a situation further – particularly if a customer is displaying aggressive behaviour or is very emotional. In other instances, it was felt that certain behaviours such as monitoring money spent might be a grey area, as big stakes are not always necessarily harmful. Therefore, there may be a gap in current training practises that focuses on the "tell-tale" signs of harmful gambling behaviour and some simple messaging for all levels of staff around appropriate steps to take.

"Approaching this can be very difficult and I know that people struggle. You can't really train people for that." (Betting Shop Operator).

[On what they would improve about implementation processes] "Behaviour recognition training and difficult conversation training... to improve staff confidence." (Casino Operator).

In terms of best practice, some felt it was most important for junior staff to have the confidence to interact with gamblers in an informal way and check they are okay, before feeding back to a more senior member of staff, such as the shift manager, to decide on the best options (e.g. self-exclusion, or suggesting a timeout). Operators felt it worked well when a manager had a higher level of training to conduct the conversation about the self-exclusion process. Although this may limit capacity to support gamblers if the manager is not available. Bingo operators had a training video for staff in identifying certain harmful behaviours. There was also general agreement across all operators about certain signs or triggers of harmful behaviours and that staff should be trained to identify, including:

- Length of time spent within a venue;
- Erratic or aggressive behaviour (banging on machines, getting angry); and

- Asking to borrow money to sustain gambling.

However, there was little evidence of training for less senior frontline staff that specifically dealt with customers for whom it might be appropriate to suggest self-exclusion, or Multi Operator Self-Exclusion Schemes, beyond a signposting role using the leaflets or materials provided if a customer enquiries about it. This was seen to be a particular issue for younger or less experienced workers who don't have a long-term rapport with customers, suggesting a gap in training provision for these staff members.

"There is a lot of younger people in the industry. How do you ask a 20-year-old to approach a 50-year-old? There might just be 3 youngsters working, who does it?" (Betting shop operator).

From the operator perspective, it was felt further training, such as live video examples showing different types of interactions with customers, might help inform all staff to have a more proactive role. This may be key to limiting harm at an earlier stage for certain customers.

Outcomes achieved

Short-Term

There are two short-term outcomes related to implementation which have been identified in the Theory of Change. Following feedback from scheme providers and emerging fieldwork findings, the first outcome, awareness and accessibility of the schemes for those who might benefit from registering, was retrospectively added as a short-term outcome

Individuals who could benefit from the schemes are aware of them and it is accessible for those who wish to register

There is generally low public awareness of Multi Operator Self-Exclusion Schemes, including amongst those harmed by gambling. Many scheme users became aware because they sought out information on self-exclusion themselves or heard about them through someone they knew, had also actively sought the information, usually as a first port of call to stop their gambling after a catalytic moment or event (e.g. a big loss).

Examples of best practice in terms of this outcome being achieved are when operator staff have taken a proactive and timely role in making customers aware of Multi Operator Self-Exclusion Schemes and helping them to take the step to register or at least consider different options. This would normally, although not exclusively, happen when there was a pre-existing relationship between individuals.

There is arguably a balancing act in terms of how much resource should be put into marketing the schemes, given that the majority of customers gamble safely and with more excluders the schemes may find the higher volumes unmanageable with the current identification technology. However, many gamblers felt that the schemes' materials were not always made visible to those who may need this information. The majority of materials were seen to be clear and effective in explaining what Multi Operator Self-Exclusion Schemes entails.

There is little evidence of cross-promotion of the other Multiple-Operator Self-Exclusion Scheme where it might be necessary, both in terms of what appears in the marketing materials and communication from operator staff. Therefore, some scheme users were not aware of the other Multi Operator Self-Exclusion Schemes when they may have benefitted from registering to them and risked merely deflecting their harmful behaviour into another sector.

Frontline/helpline staff feel they have the confidence and training required to provide appropriate and effective guidance to all gamblers including those harmed by gambling

Generally, there was a perception amongst gamblers and scheme users that there wasn't always sufficient training of operator staff to provide appropriate guidance, including signposting to Multi Operator Self-Exclusion Schemes. Some gamblers and scheme users felt that operator staff lacked the skills or motivation to support customers within the business-driven environment.

For scheme-users, there is mixed evidence of how helpful the staff had been in supporting them to self-exclude. However, we consistently found that staff interaction was deemed to be critical in the moment when they decided to address their gambling, as they tend to be in a vulnerable frame of mind. In instances staff were not deemed to be responsive to these sensitivities and this had detrimental effects on the gambler in terms of their willingness to self-exclude at that time or in the future.

There is sometimes an issue with staff confidence to approach gamblers where they might be behaving erratically or being potentially volatile, particularly amongst less senior employees who may not know the customer personally. Sometimes these customers can be amongst the most vulnerable.

Linked to this there is sometimes a perceived grey area of when to approach someone, either because they are normally a safe gambler and might simply be having a bad day, or if they are spending a lot of money but not necessarily demonstrating signs of harm. It was felt further training might be required to standardise the scenarios in which staff should approach customers.

The evidence suggests that while there are obvious efforts to make progress toward these short-term implementation outcomes, there are still some fundamental barriers which will need to be further explored in the second phase of research. Below we summarise some recommendations that could address these barriers and help achieve the short-term outcomes.

Recommendations to support desired outcomes

- Ensure staff are aware of the distinction between Single Operator and Multi Operator Self-Exclusion Schemes, including schemes in other sectors. This could be implemented within current training on self-exclusion, and part of the responsibility of staff to learn a little more about customer's other gambling behaviour, if they are willing to share it, to see if they might need further support or benefit from another self-exclusion. Consider making it a requirement that all staff are trained on being empathetic and sensitive towards customers. As evidenced in the qualitative interviews, the decision to self-exclude can be a deeply emotional moment.

- Consider aligning the branding of Multi-Operator Self-Exclusion Schemes to have a common identifier, such as a shared slogan. This could build on existing branding such as, When The Fun Stops, Stop, or at least have an element of common branding in line with other harm-minimisation materials, such as all having a link to BeGambleAware or GamCare. This could be a link to a landing page that also contains information about other schemes, to raise awareness of Multi Operator Self-Exclusion Schemes, and act as a cohesive tool to be applied across sectors. It is important to note that the aim should not necessarily be to promote self-exclusion schemes to encourage registration but to ensure materials are consistently visible and accessible for those who need them and there are better linkages between scheme materials for people who may wish to enrol on multiple schemes.

- Develop a cohesive training programme that looks at signs of gambling harm that can be rolled out across all land-based sectors. This could include some specific triggers or using learned information about a customer who may benefit from self-exclusion or other harm-minimisation tools as a case-study example. A possible tool to aide this could be the Gambling Commission customer interaction guidance, and operators could ensure that this is consistently implemented into staff training. There is a need to ensure training enables staff of all levels/seniority to feel confident to approach those who might be displaying harmful behaviour and to interact with all types of gamblers (including building rapport with customers to make those conversations easier for staff). Ensuring staff are able to do this may, in the long-term, reduce the numbers of people who feel the need to self-exclude as they are supported to take other preventative measures such as taking time out or spending limits.

Gaps in knowledge

- How analysis of account-based play is used to identify gamblers experiencing harm could be key to effective implementation of Multi Operator Self-Exclusion Schemes and signposting gamblers to support more widely. There is a gap in knowledge about how session-based play can be monitored using technology to identify harms. There may be a need to explore further how these systems can work alongside customer interaction training for frontline staff. This will enable staff to feel more confident when approaching an individual and evidencing why they have done so. It could also remove some of the ambiguity for more junior members of the team, in terms of interpreting whether a situation requires intervention or not.

7 Delivery activities

The delivery of Multiple-Operator Self-Exclusion Schemes relates to the systems and supporting activities carried out by each operator and enabling the ongoing identification of gamblers displaying harmful behaviour. As well as the signposting to Multi-Operator Self-Exclusion Schemes and self-exclusion.

Current registration

In our quantitative survey of the general public we found that **1% of those who have heard of self-exclusion say that they are currently registered to a self-exclusion scheme,** while 2% say they have done so in the past. A further 1% said they are not registered to a self-exclusion scheme but have given it consideration. The number of self-excluded individuals in the survey rises depending on gambling behaviour. While only 5% of all gamblers in the survey say they are registered, or have been registered in the past for self-exclusion, this number is higher amongst those considered to be 'at risk' gamblers (15%) compared with just 2% who are classified as non-problem gamblers on the PGSI..

Figure 7.1: **Registration to a self-exclusion scheme**

Q10. Before this interview, how much, if anything, would you say you know about the Multi Operator Self Exclusion Schemes such as SENSE or GAMSTOP?

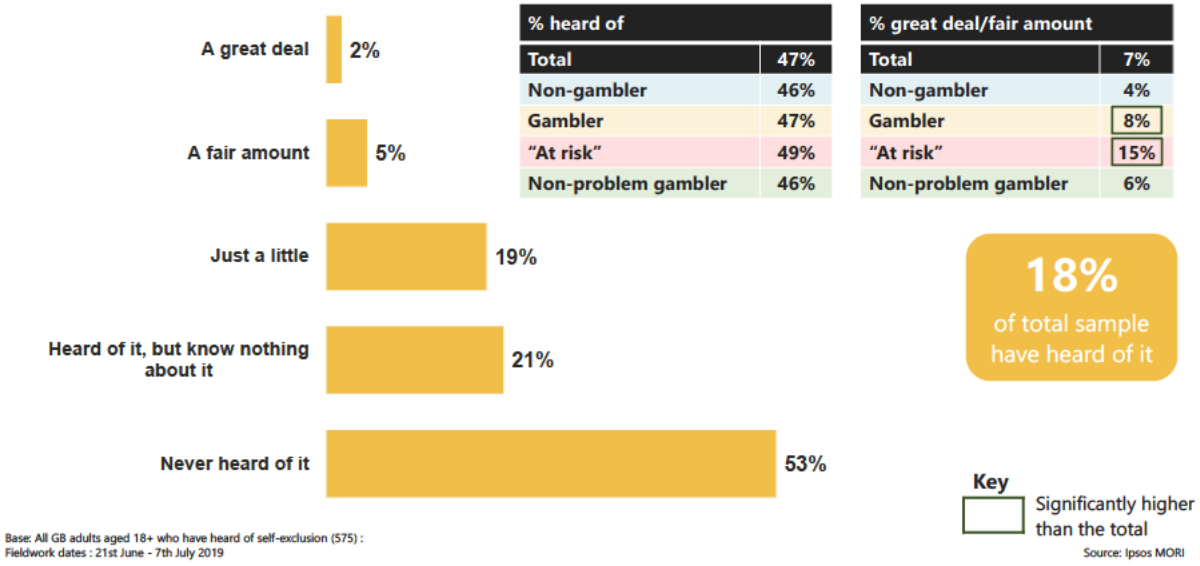


Figure 7.2: **Self-exclusion by sector**

Q9. From which of the following, if any, types of gambling have you self-excluded from?

Absolute numbers

Base: All GB adults aged 18+ who have self-excluded (16) :
Fieldwork dates : 21st June - 7th July 2019

Source: Ipsos MORI

Most individuals who were self-excluded within the survey say they were self-excluded from online betting websites. There was only one self-excluded individual for each of the following sectors - casino, arcades and betting shops. It is important to note that these findings are only indicative as the sample size of self-excluders in the survey was too small to extrapolate to the population.

The process of registering to self-exclude

Scheme operator staff responsiveness to gamblers displaying harmful behaviour who want to self-exclude

Our earlier consultations in the research confirmed the perception established in the literature review that Multi-Operator Self-Exclusion Schemes are a self-help tool that gamblers displaying harmful behaviour must themselves step towards. Key to this evaluation is the assessment of the extent to which operators respond to gamblers' expression of interest in Multiple-Operator Self-Exclusion Schemes, with appropriate support enabling gamblers displaying harmful behaviour to sign up to Multiple-Operator Self-Exclusion Schemes.

In our interviews with scheme users, **operator staff were said for the most part to be helpful,** however there was some variation between and within gambling sectors. Scheme users said staff at casinos were helpful when registering to SENSE. Managers were viewed as taking the self-exclusion process seriously and responded quickly when a customer approached personnel requesting to self-exclude. They treated the process with sensitivity, taking the customer to a separate location, and walked them through the self-exclusion registration process.

"It was pretty straight-forward, so I asked to speak to the manager about self-excluding myself and within five minutes they came out, they talked me through the process of what it involved and it was a minimum of one year to do it for." (Male, 25, SENSE, GAMSTOP).

"Process with the managers is fantastic. They explain all of the implications to it, and at the end of it all they say, 'Look, I know I'm a manager of this place and our aim is to try and get as many people as possible, but you have made the right decision in the circumstances that you are in." (Male, 32, SENSE, MOSES).

There was mixed opinion when it came to staff responsiveness at non-membership operators. The responsiveness of staff in these premises was usually attributed to the prior relationship a customer may have had with the operator staff. Where there was a relationship already established, typically as a result of the customer visiting the premises frequently and/or being located within smaller communities, staff were seen to be knowledgeable and attentive. Where there was not a previous relationship between staff and the customer, staff were often seen as less knowledgeable or interested in assisting the customer through the self-exclusion process.

"They [staff] knew I had a daughter and obviously they were putting my daughter's interests at heart as well, so it was really good." (Female, 33 Bacta).

"There's no support at all. They don't say that there's GamCare, or all the services are out there, or Money Matters. They just do nothing. They just, like, want you to sign that form and get out." (Female, 42, MOSES)

There were also instances where some scheme users felt operators actively discouraged them from self-excluding, asking them to go away and think about it instead, or suggesting that they do a shorter self-exclusion than that which the scheme user had requested. These issues were mentioned by several registered with Bacta:

"[I'd] always ask for twelve months [exclusion], and they say, 'Are you sure you don't want three or six months?' And I'm saying, 'No, twelve months,' because the staff who do the self-exclusions on the tablets try to encourage people to carry on gambling." (Female, 58, Bacta).

"I'd say to the member of staff, you know, 'Look, I've lost another £800, I need to self-exclude.' 'No, no, no, don't do that because then you can't come in. I love seeing you, it's lovely to have a chat" and, 'Don't self-exclude, just try again next week. Give it a couple of days, come back.' That's what I was doing for years." (Female, 44, Bacta).

Those who registered with GAMSTOP mentioned that it lacked a human touch because the process is conducted online. Despite GAMSTOP having a live chat function, with a live representative for customers to ask any questions, the use of this chat function was not mentioned by any of the scheme users. Some said the process itself was not clear, for example which specific sites they were signing up to self-exclude from. One

individual mentioned that the lack of a follow-up email following the registration process contributed to this confusion.

"It was all a bit grey, what I was actually registering to when I registered to GAMSTOP… It was all a bit unclear on how it worked and then there were no follow-up emails after it." (Male, 31, GAMSTOP, MOSES, SENSE, BISES, Bacta).

While operator staff were generally seen as helpful when walking customers through the registering process a few scheme users interviewed said they were not made aware of, or signposted to, self-exclusion schemes in other gambling sectors. This is a key finding as many self-excluders are registered in more than one scheme and have spontaneously mentioned in the interviews that they would desire a universal scheme.

Ease of access and navigation during registration

At the delivery phase we would expect the work done so far in the development of appropriate technology that supports the self-exclusion registration of gamblers displaying harmful behaviour to have come to fruition. As such, we expect the delivery stage to see operators working with appropriate technology (e.g. I.T. based or paper-based registration processes) to support the referral of gamblers displaying harmful behaviour.

Several scheme users interviewed felt the registration process for self-excluding was relatively straight forward.

"It wasn't difficult, I had to phone them, and then it was just a case of emailing them with a photo, just a valid photo." (Male, 38, GAMSTOP, Bacta, MOSES).

"Oh, it was an easy process. I just gave my details…They needed, like, passport on me, my details, my date of birth, all kinds of details about me and how I feel about it." (Male, 22, MOSES).

"It was absolutely easy, yes…they've got, like, an iPad and they ask you questions" (Female, 33, Bacta).

Whilst the actual act of self-exclusion in terms of providing personal details to register was straight forward across all sectors, for MOSES and Bacta specifically some felt that the process was made difficult as they had to give addresses/postcodes of the venues. Where this was done over the phone it was particularly hard as they couldn't look at a list. They then had further difficulty remembering which they had self-excluded from.

"I still did a half job…just so much effort…Because I had to pick all the bookies in and around me, and tell them the exact address, the location, what it is, blah blah blah, for them to exclude me from certain ones … And I can't even remember which ones I've told them and which ones I haven't." (Male, 30, MOSES).

This was similar for those who lived in urban areas, where there were a high number of venues in a given area, as well as more rural areas, where they would need to know the venues within a larger area which is unfamiliar.

"You have to name all the shops you want to exclude from and that's very difficult to remember who all the shops are in the areas close enough to you to get to. I mean, you know, there should be some way of doing it throughout the country." (Male, 81, Bacta, MOSES).

One individual mentioned the difficulty he had registering betting shops in a city he has just moved to and was not familiar with yet.

"I've had to phone them up a number of times saying, 'I want to add this one on, I want to add this one on'... And then it's a lot of difficulty because they've got to do it by street name as well, and I don't know all the streets... So, there were a couple of them that I knew that I could get around because they couldn't find the street. They said, 'There's no bookmaker on this street, we can't do that." (Male, 27, SENSE, Bacta, MOSES).

Another person was an electrician which meant they were constantly in new areas for work and would need to frequently call MOSES in order to add new betting shops to their self-exclusion list.

"Now I'm electrician, so if I find myself working in an area for a while, I'd phone them up...I think they can [sic] one by one but I think the poor girl would end up spending ten years of her life on my account." (Male, 36, MOSES, GAMSTOP).

As a result, when asked how the system could be improved, there was an express wish from some to simply **pick a radius or area and automatically be self-excluded** from all betting shops within that area. Others in Bacta and MOSES wanted a written confirmation, or list, of all the venues that they were self-excluded from so they would definitively know where they could not go.

The **immediacy of being able to self-exclude** is also an important factor, as a delay can lead to a change in intention. Bacta scheme users, for example, referenced the need to accommodate management schedules or incorporate a 24-hour cooling off period before the scheme user could proceed with the self-exclusion. For some this led to an extension of their gambling behaviour.

"... you could've been thinking about it for days and days and days and days, but you want to do it and go in there and say, 'Look, I don't want to come anymore. I want to bar myself because I know I'll get paid tomorrow and I'll come in here,' and they say, 'Oh, you've got to wait 24 hours." (Male, 28, MOSES, Bacta, GAMSTOP).

"A lot of the staff don't know how to deal with it [Bacta registration], and you get, 'Oh, we can't do that just now because the manager's not here,'... When you're also going into the venue, the temptation to just not go to the counter, to go to, you know, gamble." (Male, 31, MOSES, GAMSTOP, SENSE, Bacta, Bingo).

There was a suggestion made by MOSES scheme users specifically that they should be able to discreetly **register for self-exclusion within the betting shop rather than doing it via the MOSES helpline**. It was also suggested that to do so would result in better interaction with staff members, who therefore may gain better skills to recognise gamblers experiencing harm, speak with them, and assist them when needed.

"We recognise [you have a problem], would you like to come in the office so we can talk to you? We have got an exclusion scheme; would you like to do it now?'. And you probably would just do it there and then...obviously they should have a phone or something and take your picture there and then and then you just sign on and then go." (Female, 42, MOSES, GAMSTOP).

There were also a few mentions that the MOSES **helpline** was not available late enough in the evening when problem gamblers are more likely to want to seek help or self-exclude.[27]

"I went to self-exclude through MOSES once and I think, the number that you rung, it wasn't 24 hours at the time. I think it was shut and I never ended up doing it." (Male, 26, MOSES, GAMSTOP).

Lastly, in terms of carrying out the registration process, there was some concern about the lack of **discreetness in some premises** when enquiring how to self-exclude, particularly in betting shops.

"It was quite embarrassing to actually stand there and exclude yourself and take the photo. I kind of would have liked to have gone into a separate room." (Male, 48, MOSES).

There was appreciation for those registering to SENSE, where casinos brought the customer into a separate room for the registration process.

Operator staff signpost problem gamblers to treatment providers and/or formal support

The effective implementation of Multiple-Operator Self-Exclusion Schemes is expected to lead to gamblers displaying harmful behaviour registering to such a scheme. In doing so, we would also expect self-excluded gamblers to be referred to treatment providers. The longer-term effectiveness of Multiple-Operator Self-Exclusion Schemes in ensuring that gamblers who are displaying harmful behaviour are able to resolve/minimise their gambling addiction problems is contingent on (1) operators ensuring clear signposting to treatment providers, (2) the Multiple-Operator Self-Exclusion Scheme's central team signposting registered gamblers to treatment providers and gambling support available.

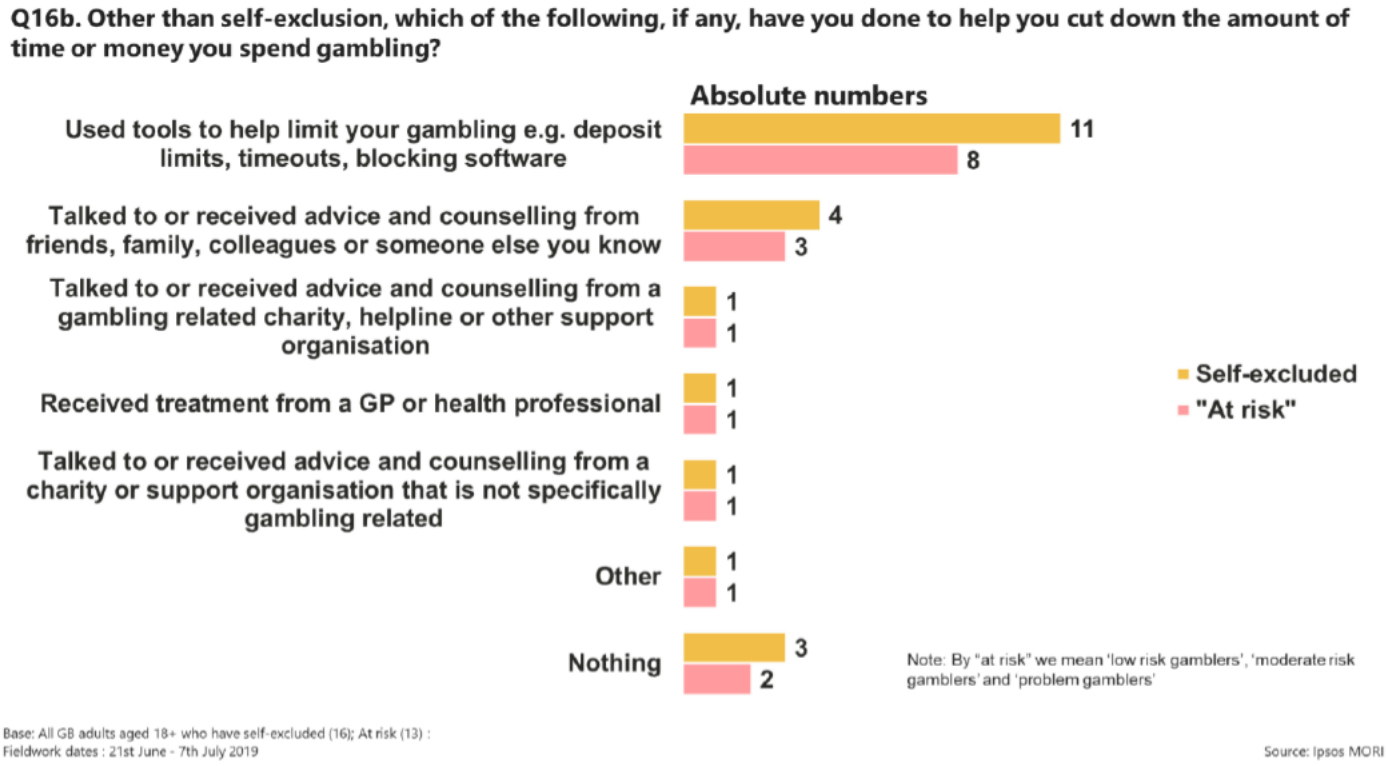
In our interviews with scheme users we found **counselling treatment (e.g. GAMCARE and Gamblers Anonymous) to be the only treatment services to have been signposted** to an individual when registering for self-exclusion. This was primarily mentioned by GAMSTOP scheme users, while it was also mentioned, though less frequently, by MOSES and Bacta scheme users.

"GAMSTOP did [signpost], because they put me in touch with a company called Beacon Counselling, who I used...they did give me numbers of helplines that I could ring if ever I felt I needed to talk to someone." (Male, 38, GAMSTOP, Bacta, MOSES).

Our survey with the general public also revealed that several online gambling self-excluders have also used blocking software as a tool. While a few online scheme users mentioned they used this it was not directly as a result of the GAMSTOP registration process. This was followed by speaking with someone that knew about their addiction, while only one individual mentioned professional counselling.

[27] The helpline is open until 10pm

Figure 7.3: **Other harm minimisation tools used by self-excluders**



Scheme users understanding of Multiple-Operator Self-Exclusion Scheme at the time of registration

The scheme users we interviewed were asked about their understanding of the self-exclusion at the time of registration, in other words if they felt familiar with the fundamentals of self-exclusion. There were some instances where an individual was not fully aware when probed on the detail. For example, some scheme users said they **did not have a complete understanding of which operators they were self-excluded from**. These individuals were mainly registered with MOSES, and they made their selection of betting shops from which to be self-excluded at the point of registration, but then failed to recall each of these.

A few individuals also mentioned that they were not sure if the self-exclusion scheme they registered to was in fact multi-operator or single operator.

"I understood that obviously if you're like one Cashino, it goes for another Cashino. I knew that, because obviously it's the same chain but I didn't realise, you know, how far it went... another amusement arcade literally round the corner from Cashino called Admiral and I didn't realise it had actually gone to there as well..." (Female, 33, Bacta).

There was some confusion amongst a few scheme users, across the sectors, on **whether online gambling was included in the non-remote schemes**. For example, they believed that if they self-excluded from land-based betting shops then this meant that they were also self-excluded from online betting shops. This did not only relate to land-based venue self-exclusion. One individual using GAMSTOP was not sure if they were also self-excluded from land-based casinos when registering. When discovering later that they were not, they then sought to self-exclude with SENSE.

"I actually thought it was linked to land casinos at the time which is what I'm sure I clicked an option for that but obviously I was told after it isn't." (Male, 43, GAMSTOP, SENSE).

There was also some confusion across the schemes as to **what happens when the self-exclusion period ends**. Some had simply forgotten their expiry date, while others had forgotten how long their self-exclusion period would last, or would confuse the time period with another scheme, in the case of multi scheme excluders. This was partly due to having no further communication with the scheme providers after registration, which is understood to be a condition for the schemes. An unintended consequence was that some individuals were anxious about their schemes 'running out' and as a result went into venues to double check they still couldn't gamble.

"Well, they don't let me know at all, but I do pop in, into places at different times, to say, is my self-exclusion up because I want to renew it." (Female, 58, Bacta).

There was also some **confusion around what happens when the self-exclusion period ends**. Those self-excluded from casinos tended to know they required a return-to-gambling meeting if they wished to end the self-exclusion after 6 months, however in other sectors it was not as clear.

"He, like, just explained that it's, obviously, six months and if you do want to come off, you have to come in and have an interview and explain why you should be taken off it and stuff like that." (Male, 34 SENSE).

Effectiveness of multi-operator self-exclusion

Overall effectiveness of multi-operator self-exclusion

Most scheme users interviewed felt that self-exclusion was effective in limiting their gambling or, had at the point of interview, stopped it completely.

The reasons why the various schemes were considered effective varied.

- **Faith in the system** – some individuals simply assumed that if they did attempt to breach, they would be caught. One individual even believed he would be arrested if caught.

Membership sectors were mostly seen to be more effective than non-membership sectors in this respect, which was largely down to a membership ID being required in order to enter the premises which made breaching more difficult.

"With the smaller [casinos], you have to, like, sort of, log-in, sort of thing, check-in, a membership, or even as a guest, you have to come in with ID and stuff like that... [at the larger casinos] they will check." (Male, 34, SENSE).[28]

One user of GAMSTOP felt it would require technical know-how to breach, so would not be able to do it. Just knowing they could not do so provided them with a safety net.

"GamStop and the other schemes are, like I said before, a safety blanket that stops me from doing it. It's like a suit of armour." (Male, 31, GAMSTOP, MOSES, SENSE, Bacta, Bingo).

"... because it's not as accessible...that was really effective for me. I haven't done any online gambling for well over a year... I've won that battle... it's the only thing that's ever, sort of, worked..." (Female, 44, GAMSTOP, MOSES, Bacta).

There were several Bacta and MOSES scheme users who felt the scheme to be just as effective as a membership scheme, but this was often because they had an established relationship with venue staff or, in a couple of cases, the scheme user just believed if they entered a premises they were self-excluded from they were guaranteed to get caught.

"...where I'd thought beforehand that I could go into any gambling shop any time that I...felt the need to gamble, as soon as I'd made that process and sent my identification off and my picture, I thought, 'Well, that's it. It's impossible for me to go into a betting shop now." (Male, 43, MOSES, GAMSTOP).

- Psychologically drawing a line under their behaviour - making the decision to self-exclude made them less likely to want to try to gamble, while another simply said he never had the temptation to breach.

"It's been good for me because I've never tried, to be fair, from the shops I'm self-excluded from, I've never tried to get in and have a bet." (Male, 26, GAMSTOP, MOSES).

"...it's more the piece of mind in knowing that, actually, I am registered with these schemes... it's just that security blanket that just stops me from wanting to do it. It's just the physical aspect of, if I do go in and I am part of it..." (Male, 31, GAMSTOP, MOSES, SENSE, Bacta, Bingo).

- Making gambling less convenient - even if sector schemes were breached the evaluation still found all schemes to have some degree of effectiveness because it required more effort from the individual to gamble (i.e. they would have to travel further). By virtue of this they therefore spend less time and money gambling than if not self-excluded.

[28] It is important to note that despite the respondent having this perception there are indeed some larger casinos that are not exclusively membership and allow walk-in customers.

"It got gambling out of my life. Like, it really did... if I want to gamble, I've got to get in my car and drive out." (Female, 36, GAMSTOP, Bingo, SENSE).

- Being caught when attempting to breach - those within the qualitative interviews who self-excluded from the membership sector - bingo and casinos, were more likely than the other land schemes to have been stopped when entering the premises. This is unsurprising as the individual is required to either show a membership card or ID at the point of entry, which immediately flags their identity to staff.

"...there was a number of casinos in Glasgow and I was drunk, and I was trying to go to a few of them, but I was not able to get in whatsoever. So that really did work..." (Male, 27, SENSE, Bacta, MOSES).

There were however examples of positive identification of scheme users who were attempting to breach in non-membership sectors

"I went into Whitstable...I'd never been in there before and she actually recognised me from a picture immediately. They obviously check every single new person that ever comes in.... The others aren't so good to be truthful with you... In the local area they do take you seriously because they say they know me, so it's a personal thing." (Male, 81, Bacta, MOSES).

As mentioned in the previous section there was confusion among some scheme users as to when their self-exclusion period ended. Several suggested that self-exclusion could be more effective if they were able to opt for a longer exclusion period, some mentioning indefinitely. This way the expiry date or trying to work out when it was due to expire if forgotten, would not be a concern for them.

"I'd prefer lifetime... If you make the decision to phone up and self-exclude, it's obviously a big decision, you know you want it. I think it needs to be a lifetime." (Male, 38, Bacta, MOSES, GAMSTOP).

Ineffectiveness of multi-operator self-exclusion

Gambling in non-self-excluded venues

Several scheme users interviewed had continued gambling during their self-exclusion period at venues which they were not registered with. Those who did this were usually self-excluded with either MOSES or Bacta which do not allow for a blanket self-exclusion in all venues. These individuals would simply travel a given distance outside their self-exclusion zone.

"I find myself just going to different establishments. Going to different bookies. They're literally all over the place. There are thousands of them. You're never too far from one." (Male, 31, MOSES, Bacta).

"Even though I was excluded from that one, I would travel out of town and go to the ones that I wasn't excluded from. Because you're only excluded from certain ones. That's what made it harder for me. So, I would just go anywhere where I know I could get in." (Female, 42, MOSES, GAMSTOP).

One SENSE scheme user mentioned that he changed his self-exclusion to only casinos in his city. He felt that after his first 6 months with a national self-exclusion he was in control of his gambling so could occasionally gamble with friends while on holiday.

Very few individuals moved on to gambling in a completely different or new sector. Some scheme users would carry on their preferred gambling method to online. For example, if they self-excluded from SENSE or Bacta they would then play casino or arcade type games online.

"When it's online it's easier to see...you click a button and you've put money straight from your account. In a casino you have to physically go to a cash machine sometimes outside with limits so I wouldn't." (Male, 22, SENSE).

Some of these individuals would then self-exclude through GAMSTOP after noticing they carried on their harmful gambling behaviour online. It is also worth noting that a few scheme users interviewed had self-excluded with GAMSTOP immediately after registering with one of the land-based schemes simply as a safety net, even if they rarely gambled online prior to self-exclusion.

Breaching – scheme users' experiences

In our interviews we found many examples where **scheme users across all sectors had attempted to breach their self-exclusion agreement** at some point. Their breach experience, and ability to continue gambling, differed according to which sector they were self-excluded from.

It was non-membership schemes which were considered easier to breach. However, with casinos there were some occasions when individuals were able to bypass getting stopped at entry either by going to a non-membership required casino or entering via a guest list at larger casinos.

"If you go to casinos in the big cities, the casinos are like an open door. You can just walk in, they don't check your ID." (Male, 34, SENSE, GAMSTOP, MOSES).[29]

[On SENSE] "...someone who's self-excluded can still go in and play, like, if they really wanted to... they don't ask for ID, and then, if you're not taking out anything over £1,500, they won't ask for ID, you can just say you're a guest." (Male, 34, SENSE).

Despite getting through the door these scheme users were typically caught, often when attempting to cash in their winnings, or their identity had been flagged when staff reviewed the guest list.

"It was a casino I wasn't even a member of, either. So, I like, signed in as a guest. I, like, put my name on the guestlist, and it flagged up on the guestlist, that name." (Male, 27, SENSE).

Experiences in non-membership sectors, betting shops and arcades, were mixed. Scheme users attempting to breach within these sectors tended to go to premises where they felt they would not be recognised. In these instances there appeared to be a lot of dependency on the alertness of staff or a reliance on their relationships with customers. Where individuals were less likely to have known or had a prior relationship with staff there was a higher likelihood that they would not be caught.

"[When someone is able to breach their self-exclusion] I understand why it happens but, in that instance, it was just me and I was the only person in there for about three hours... He [the staff member] could see I was losing shedloads of money. I would be able to recognise an addict's behaviour if I saw it. So, as someone who works in the store and works there every day, I would imagine they can too." (Male, 24, MOSES, GAMSTOP).

One individual who had self-excluded from motorway arcades said that she often went to arcades she self-excluded from and was rarely ever caught. Being caught would most likely happen if a staff member happened to be on site, but even then, she often managed to breach when they were present.

"I checked to make sure I was banned with Welcome Break and they assured me I was, but I was never, ever challenged. If I'd been challenged, that would [have been] it. They'd do, 'No, I'm sorry, you've got to leave the premises because you're self-excluded,' and then I would never have gone back." (Female, 40, Bacta).

There were mixed feelings from scheme users regarding the perception of how staff handled these situations. Overall, there was a general appreciation that staff were simply doing their job and therefore acted in a professional and understanding manner, asking the self-excluded individual to leave the premises and explaining why.

[29] We note this quote contradicts the quote on page 56. This is due to a variance in user perceptions.

"...they don't shout about it. They do come up to you and speak to you quietly. Twice it's happened where someone's come up to me and said, 'You're excluded from here, can you please leave?' ...There are three locally to me, and each one has got a person I know in there. They're very good, and they will tell me to get out." (Male, 38, Bacta, GAMSTOP, MOSES).

There were instances whereby staff either didn't successfully identify, or didn't proactively approach self-excluded individuals, particularly within establishments where they were regular visitors and felt they should be recognised, or in smaller premises with lower footfall.

"...two or three times in the past, two or three weeks and yes, nobody's batted an eyelid. Nobody said to me, you know, 'Oh, you're not allowed in there. You're self-excluded.' Again, I don't think they actually look at the forms." (Female, 44, GAMSTOP, MOSES).

Although rare, there were a couple of occasions mentioned where the scheme users thought that staff handled the exchange unprofessionally and the interactions could have been more discrete.

"The staff is, kind of, a bit lazy. I'm self-excluded around my area. If I go to [operator], if I try to walk through [operator]'s shop, they start calling the police. They tell me that I need to leave the premises, if I gamble..." (Male, 35, MOSES).

"One shop let me go in, the staff knows I'm self-excluding, but they let me gamble, they lend me cash... they wait until you lose all your money, then they say, 'Oh, you're self-excluded. You're not supposed to be here.' But they wait until I've lost all my money..." (Male, 35, MOSES)

There were a few examples given from membership scheme users - particularly SENSE- who were caught breaching at the point of cashing in, having entered the premises and gambled for sometimes significant periods of time. In these instances, although the scheme users understood their obligations under the terms of the scheme, they were unhappy that identification had not taken place sooner, with a perception that operators were focusing on the money and not the gambler in these instances.

"If I lose money, I lose money; If I win money, I lose money... I spent £700 on a table quite freely and easily considering I'm on SENSE. I won about £2000, they asked for my name and DOB, I tried not to give it but they got it out of me. Then the manager came over and said you're self-excluded so we're confiscating your funds..." (Male, 34, SENSE, GAMSTOP, MOSES).

"I re-entered on maybe four or five occasions. Went in and found I was allowed to play, nobody stopped me until I'd actually won some money and went to cash the chips- at which point they became interested in me which I found rather annoying." (Male, 48, SENSE).

Breaching –operator frontline staff perspectives

When discussing breaching behaviour with frontline staff there was agreement from all participants that there needs to be greater emphasis on customer responsibility. This would be done by:

- Providing greater clarity to customers that it is part of their responsibility to not attempt to breach, both in promotional materials and at the point of registration;

  "There's nothing anywhere that says it is also your responsibility." (Casino operator)[30]

- Placing emphasis on the fact that winnings will not be paid out at the point of detection.

Using other self-harm-minimisation tools in conjunction with self-exclusion

In our interviews with scheme users we found that very few use other harm minimisation tools in conjunction with self-exclusion. A few scheme users had used counselling (such as GAMCARE or Gamblers Anonymous) however these individuals mentioned they had used counselling prior to self-exclusion.

"Contacted GamCare a few times. Normally get pointed to a local Gamblers Anonymous sort of thing. I've never been to one. Never believed that group sessions with people with the same problems have any benefit." (Male, 34, SENSE/MOSES/GAMSTOP).

One user mentioned he had used GAMCARE prior to self-exclusion but did not continue to do so after registering. This was because he felt counselling had no effect on him and he probably would have stopped regardless of self-excluding. Another individual mentioned that they found social media to be a useful, though unofficial, tool where they were able to hold discussions and confide in other people around the world with similar issues.

Outcomes achieved

Short-term

The Theory of Change identifies two short term outcomes:

- Frontline/helpline staff being able to identify gamblers displaying harmful behaviour; and

- Signpost those individuals to a) guidance & treatment providers' materials and b) multi-operator self-exclusion schemes.

The achievement of these short-term outcomes is limited. Our interviews with scheme providers and operator front line staff showed that frontline staff are provided with training to identify gamblers displaying harmful behaviour, but there was a request for more training of this nature. In our interviews with scheme users, the vast majority said they took the initiative themselves to inquire about self-exclusion, and only a few said that they were approached by staff after being identified as presenting with self-harm gambling. These instances

[30] Gambling Commission guidelines however do say that it is a joint responsibility: See https://www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Self-exclusion.aspx

primarily occurred where there was already a relationship between the individual and the staff member, who then felt morally obliged to be more proactive. Still, the scheme users who were approached by staff said it was done so in a sensitive manner and felt appreciative that they took the time to speak with them.

When scheme users talked to operator frontline staff about a Multiple-Operator Self-Exclusion Scheme, only a few mentioned that they were signposted to other self-harm minimisation tools either prior to being told to consider self-exclusion or during the self-exclusion registration process. A few had been told about counselling treatment providers although the take up for these was limited.

Another short-term outcome identified is that **frontline staff are supported by adequate monitoring and referral tools enabling efficient identification of greater numbers of self-excluders in each location through Multi-Operator Self-Exclusion Schemes.** There are identified inadequacies in a number of the schemes which have been identified by the scheme providers themselves, specifically non-membership schemes whereby the identification of individuals is reliant upon regular briefings to staff on self-excluders, a good memory for faces and strong relationships with customers. The use of a tablet computer, rather than physical photos, which was introduced to meet with GDPR regulations, makes this task harder for staff in terms of ease of reference. It should be noted that all of this can have a direct consequence on staff confidence as outlined in the Theory of Change.

Medium-term

A medium-term outcome identified in the Theory of Change is **that gamblers displaying harmful behaviour exclude from a particular gambling sector using Multiple-Operator Self-Exclusion Schemes.**

We know that some gamblers who display harmful behaviour do indeed utilise self-exclusion as a tool to reduce or control their gambling. In our interviews with scheme users we found that self-exclusion was most likely the first harm-minimisation tool sought out, often where the scheme user enquired about the possibility to ban themselves from a particular venue or sector. Our discussion groups with gamblers, and quantitative research, provided insight into a number of barriers which may prohibit a gambler who displays harmful behaviour from partaking in self-exclusion. These barriers include:

- A lack of awareness about the existence of Multi-Operator Self Exclusion Schemes;
- Gamblers not perceiving themselves to be experiencing gambling-related harm, despite citing harmful gambling behaviours;
- A perception that self-exclusion doesn't work, either because of a lack of confidence in the ability of premises or websites to prevent breaching, or because it is not sufficiently broad to prevent problem gambling beyond the exclusion areas or in different sectors;

"I self-excluded from casino games but you can do that and still bet on sport." (Male, betting shop gambler).[31]

"The ex-friend I referred to [...] he just got people to put bets on for him" (Male, casino gambler).

- Participants did not think it was realistic to rely on frontline staff to enforce self-exclusion effectively and stated that too much pressure seems to be placed on them. Some doubted staff motivation and talked about the incentives that they have to allow problem gamblers to gamble uninterrupted.

- Some worried that the length of the exclusion period might put people off signing up.

"People might not think they have a big enough issue to quit for a year" (Male, betting shops gambler).

- Others, conversely, felt exclusions were not long enough.

- One participant said they worried about missing out on chances to win when gambling.

"Sometimes I feel regret at not placing a bet when the results would be good and that makes me sad." (Female, online gambler).

Another medium-term outcome we would expect to see is that **gamblers who display harmful behaviour access and utilise treatment providers' tools.**

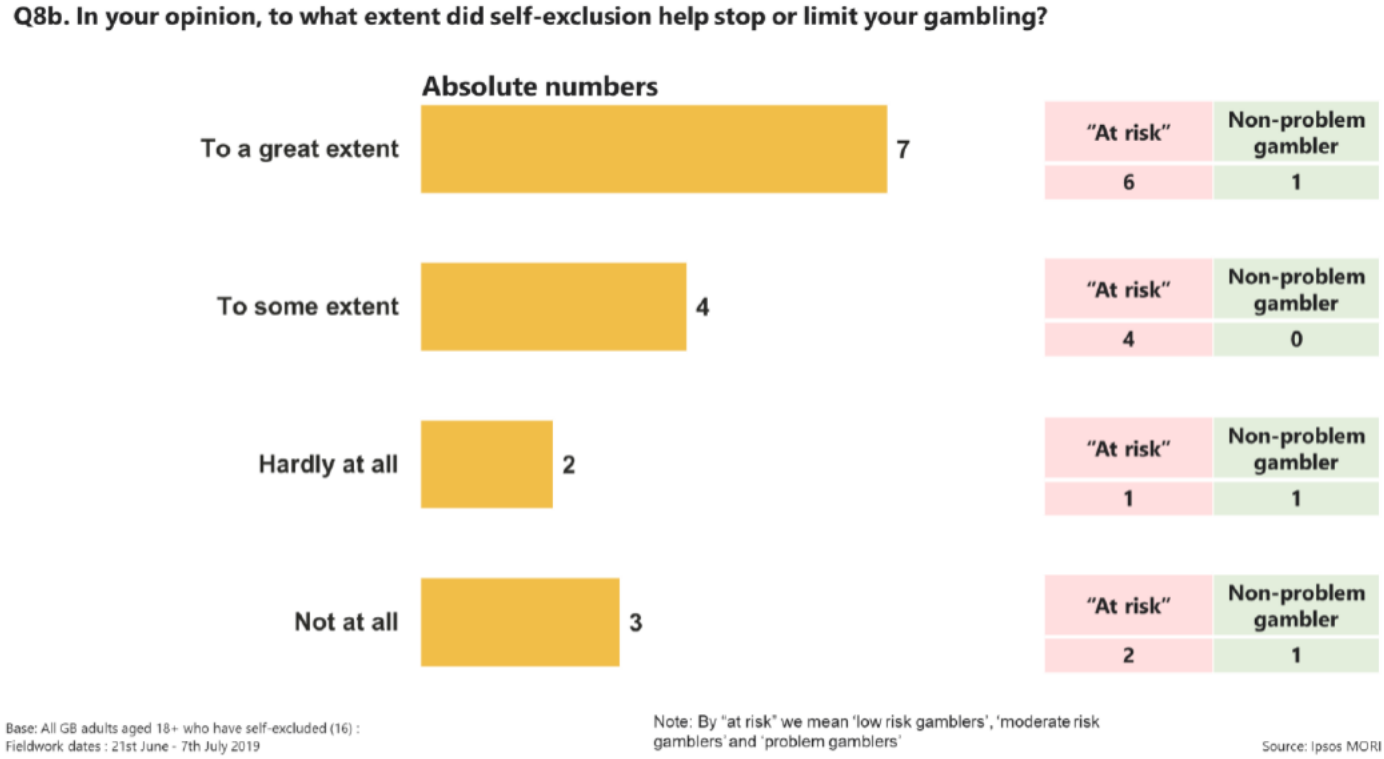
There was little evidence in our interviews with scheme users that they utilise other treatment providers' tools. Counselling (such as GAMCARE or Gamblers Anonymous) was the most mentioned treatment provider tool. Several individuals mentioned they had done this prior to self-exclusion. Some said they received counselling after self-excluding, but in most instances they had stopped attending sessions as they did not find it useful.

Whilst it is too early in the evaluation to make a judgement, there is an indication that **Multiple-Operator Self-Exclusion Schemes are working towards ensuring that self-excluders refrain from gambling**, not just with individual providers, but within the wider sector for which they have self-excluded. This is another medium-term outcome.

Although we are not able to fully determine if this outcome has been reached at this phase of the evaluation, we have provided evidence that some of those who have self-excluded have at least limited their gambling.

[31] This individual self-excluded online via individual casino websites and not GAMSTOP or an individual self-exclusion scheme. The respondent was from the online focus groups and not the qualitative in-depth interviews with scheme users.

Figure 7.4: **Has self-exclusion stopped or limited gambling?**



Our quantitative survey found that 11 out of 16 individuals who have self-excluded found the scheme to have helped stop or limit their gambling to either some or a great extent. While interviews with scheme users showed that most had attempted to breach their self-exclusion agreement, with some exceptions, these individuals were gambling to a lesser extent than they were before self-exclusion. This was largely because self-exclusion, as a minimum, created a barrier to gambling. Having to go further distances to enter a venue they were not self-excluded from, or the subterfuge required to enter a venue from which they were self-excluded.

Long-term

This first phase of the evaluation is working towards assessing the following longer-term impacts:

Gamblers displaying harmful behaviour will utilise other tools and/or seek treatment to transition from harm generated gambling behaviour to sustained safe gambling behaviour

- However, as mentioned above, most scheme users interviewed to date tended not to use other harm minimisation tools in parallel to their self-exclusion. This will be explored in more depth in the next phase of the evaluation.

Gamblers who display harmful behaviour transition from harm-generating behaviour to sustained, safe gambling behaviour, or have developed the capability to refrain from gambling without external support.

- Although we cannot make conclusions at this point of the evaluation on gambling behaviour post-self-exclusion scheme, users were asked in our interviews about their thoughts regarding what they plan to do when their self-exclusion period ends. Although most interviewed did not know what they would do

at that point, many believed they would either let the self-exclusion run out and not return to gambling or would re-register. There was a perception from these individuals that they would not be able to control their gambling so believed they would need this barrier in place indefinitely.

"As soon as they come back with the lift of the ban then I'm going to stick it back on again... I don't want to gamble. I'm in a lot better position now, so I don't want to do that anymore." (Male, 30, MOSES).

- A few said self-exclusion has helped them better manage the amount of time and money they spend on gambling. Therefore, they felt better placed to make a decision on whether to return to gambling. These findings are indicative and will be explored in greater depth in the ongoing phases of the evaluation.

Reduction in gambling related harms concerning personal well-being, employment, relationships and financial circumstances

- Once again, this impact will be explored further in the next phase of the evaluation. Several scheme users interviewed did mention an improvement in their lives where they either had better relationships with friends or family, and/or had more money and were therefore in a better financial position.

"Like I say, I've started saving now instead of spending all my money every month and that, start saving up, get a house and stuff like that. I'm going on holiday next week." (Male, 21, Bacta, GAMSTOP).

- It should also be noted that very few had mentioned things that had become worse for them since self-excluding, several had said that there had not been any significant changes to their life;

Operators improve their understanding of gambling related harms and ways of supporting gamblers to minimise these.

- This will be explored in the next phase of the evaluation.

Recommendations to support desired outcomes

Scheme users offered a number of recommendations that they believed would help better their experience of self-exclusion. For various reasons, we understand that not all these would be possible to implement, but they do offer insight from the perspective of those the schemes are designed to help.

- Single cross sector self-exclusion scheme: The most frequently mentioned recommendation by scheme users was the creation of a single cross-sector self-exclusion scheme. Although the practicalities of such a scheme would face several challenges, we felt it was important to note that a desire for a blanket scheme arose out of the complexity or misperception some individuals faced when wanting to self-exclude from more than one sector. The most noted sector cross-over amongst scheme users was between a primary land-based sector with online. It may be worth exploring how online self-exclusion registration could be integrated with land-based self-exclusion schemes.

- **Improvement on venue/exclusion area selection when self-excluding**: When registering with MOSES, some customers experienced difficulty, or confusion, when selecting the venues and/or area they would like to self-exclude from. While geography and density of venues within a particular area are considerations to the effectiveness of how the scheme is managed, it would be beneficial to the customer if the member of staff registering them could provide more guidance during the registration process. For example, both being able to offer names/locations of venues near where the customer would like to exclude from, or making the customer aware in advance that they will need to know the details of the venues they want to exclude from when registering could make the registration process easier for the customer. Being able to simply pick a radius or area and automatically be self-excluded from all betting shops within that area was mentioned by some scheme users as the most desirable improvement concerning this issue.

  Additionally, scheme users would find it beneficial to receive a written confirmation or list of all the venues from which they were self-excluded so they would definitively know where they should not go. Whilst not available during the evaluation, it should be noted that GAMSTOP now has consumer account functionality which will allow an individual to check the status of their exclusion and to extend it. Given that not knowing when a self-exclusion finishes creates a level of anxiety in individuals, and the fact that there is a desire from some to be able to extend their self-exclusion periods, this change in scheme management should be considered best practice.

- **Improved marketing and visibility around self-exclusion**: As many scheme users were not aware of self-exclusion prior to asking about how they could ban themselves from gambling. Furthermore, customers who register for self-exclusion should also be made aware that other self-exclusion schemes exist within other gambling sectors. They should then be signposted on where to go for further information or register for these other schemes.

- **Longer self-exclusion periods**: Many of the scheme users interviewed requested that their self-exclusion period be longer than the length of time that was available to them. In some cases, scheme users said they would have preferred an indefinite self-exclusion period. Five years was also mentioned as a suitable length. The varying time-lengths for each of the schemes also created some confusion with a few scheme users not recalling which scheme ends at which point. More consistency on self-exclusion period lengths could therefore also be beneficial.

- **Improved training for staff to sensitively deal with customers wanting to self-exclude:** Although frontline staff are trained on how to deal with customers who enquire about self-exclusion and a number of individuals said they had a positive experience with staff, some scheme users mentioned staff could have dealt with the situation in a more sensitive manner. This was usually when staff were unable to provide information to the customer and asked for them to return to speak to a different staff member.

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Others said that when they did hold the discussion, they would have preferred to have done this in a more discreet location within the premises.

- **Extended hours for helplines**: It was mentioned by a few scheme users that the MOSES helpline was not available in the evening when customers are more likely to want to register for self-exclusion. We are aware that the helpline is open late but it may be worth considering if this could be extended.[32] Additionally, MOSES users have suggested being able to register at betting shops themselves as they can be for Bacta.

- **Information sheet on personal self-exclusion details**: As discussed, several scheme users were unaware of when their self-exclusion period ends and the specific venues that they are self-excluded from. Some individuals mentioned it would be helpful to have this information on hand or available to them when they register but also for ease of reference to avoid customers entering premises to find out this information at a time when they might be feeling vulnerable. This information could be provided to them either in written confirmation or potentially via an online portal that users could log into to find out the details of their self-exclusion.

- **Better policing of venues**: Although they appreciate the challenges, several scheme users believed better policing of venues to make breaching more difficult would improve the effectiveness of the scheme. A challenge for non-remote sectors is a reliance on good quality photos and these to be regularly monitored or familiar to staff. Some mentioned using facial recognition technology which we are aware is being tested and implemented in more land-based venues. In our interviews we found that some scheme users who breached were caught when requiring ID to cash in their winnings, primarily in casinos. A consideration may be to do this more often at venues where this may not be the norm.

- **Improved regulations and guidelines around operator advertising**: Even though advertising falls outside the remit of self-exclusion schemes, some scheme users mentioned that it would be beneficial to them if they were not confronted with general gambling advertisements. Online advert blockers seem to work well, however regulating this on television and radio could prove more difficult. Two scheme users mentioned that certain sounds, for example the clinking of a slot machine, were enough to trigger their desire to gamble. More investigation into these triggers through advertising may be worth consideration.

[32] Currently the hotline hours are open from 8am -12am seven days a week. We note that these hours were extended from 8am – 8pm in January 2019. The scheme user may have not been aware of the changes at the time of the interview.

Conclusion

Whilst each gambling sector is at a different stage regarding its development of their Multiple-Operator Self-Exclusion Scheme, the first phase of this evaluation has already highlighted a number of enablers and barriers in regard to the implementation and effectiveness of the schemes.

The first phase of the evaluation covered both awareness, amongst the general public and gamblers who display harmful behaviour, as well as the process of registration amongst scheme users. While the Multi-Operator Self-Exclusion Scheme promotional materials for consumers are clear and easy to understand there was an identified need for improved visibility. Public awareness could be increased as scheme users stated in the research that they only became aware of the Multi-Operator Self-Exclusion Schemes through internet searches or recommendations from someone else. It is also apparent that there is a gap in consistent approaches to training provision of operator staff in identifying and approaching those displaying gambling-related harm, and how technology can be used to assist in this. Something that will need to be explored further in the second phase.

Phase 1 has identified a number of areas that would benefit from improvement. The registration process to Multi-Operator Self-Exclusion Schemes is generally considered straight forward although it was demonstrated that there are instances when operator staff could deal with registration more effectively. Also communication to scheme users as to how the Multi-Operator Self-Exclusion Schemes actually works could be strengthened. For example, some scheme users were unsure of the geographical zone or time length of their self-exclusion. Tools to aid the identification of individuals breaching are also seen to be limited in their effectiveness.

While thus far this evaluation has only measured short-term impact there is an indication that the schemes are proving to be effective for scheme users, either by modifying their behaviour, or having stopped it completely. This demonstrates the need to continue evaluating the Multiple-Operator Self-Exclusion Schemes to gain a better knowledge of its long-term impacts.

Appendix

Reporting conventions

Terminology

When referring to Multi-Operator Self-Exclusion Schemes we have not used any abbreviation, to avoid confusion with MOSES (Multi Operator Self-Exclusion for Betting shops).

Stakeholders naming conventions:

- Scheme providers (e.g. GAMSTOP)
- Scheme operators (e.g. betting shops)
- Scheme users
- A member of the public (quant survey where non-gamblers)
- A gambler (someone who gambles but is not a scheme user)

Scheme naming conventions (note case sensitive)

- SENSE (casinos)
- Bacta (arcades)
- Bingo Industry Self-Exclusion (bingo membership)
- Smart Exclusion (high street bingo – no membership)
- MOSES (betting shops)
- GAMSTOP (online)

Collective nouns

- Non-member schemes (arcade, high street bingo, betting shops)
- Membership schemes (casino, non-high street bingo)
- Remote operators (online)
- Non-remote operators (land based)

Quotes.

When using a direct verbatim quote, we have referred to different groups in different ways, as shown below. It is worth noting that online focus groups were asked to use an alias, and therefore age cannot always be appended to a quote. For consistency, we therefore removed age from all online gambler quotes.

e.g. "quote" (Gender, Sector Gambler)

"If you self-exclude online there's no way back – you do it for 90 days and that's it. Nothing like that exists for shops." (Male, Betting shop gambler).[33]

For scheme user surveys, we were able to attribute age, gender and any schemes they have enrolled on (some participants were registered to more than one Multi Operator Self-Exclusion scheme).

e.g. "quote" (Gender, Age, Scheme)

"I'd, kind of, seen it out of the corner of my eyes [in a betting shop], as you would when you think about it. And then, of course, my counsellor that I did go to with GamCare, he suggested all this as well." (Male, 43, MOSES).

[33] This quote, as throughout, is a direct verbatim from a research participant, based on their own perceptions. We recognise that these perceptions may not always represent factual truth, but serve to show the extent of participant understanding of the schemes.

Glossary of terms

Term	Definition
Bacta	The trade association for the amusement and gaming industry, responsible for the Multi-Operator Self-Exclusion Scheme for Gaming, Arcades and some Bingo premises.
BeGambleAware	GambleAware is the leading charity in the UK committed to reducing gambling-related harms.
Bingo Industry Self-Exclusion Scheme (BISES)	A national self-exclusion scheme which enables a customer to self-exclude from every UK bingo club with just one request.
Breaching	Gamblers who have self-excluded but attempt to gamble in a premises / on a site that is included in the terms of their self-exclusion agreement.
Causal Mechanisms	The means by which an outcome is brought about or achieved.
Depth interview	A qualitative semi-structured research method that is typically a 1 to 1 interview between a researcher and participant. Depth interviews offer more insight and flexibility than a survey and can be more appropriate than a focus group, particularly when it comes to sensitive issues such as gambling.
Focus group	A qualitative research method. Usually a group discussion, that can take place in person or online through a forum. Typically, 6-10 participants will take part in a focus group.
Gambler (survey definition)	Those who have taken part in at least one gambling activity in the past 12 months, as defined in the Gambling Participation Survey (conducted by The Gambling Commission). For this survey, those who have partaken in National Lottery ONLY are not defined as gamblers.
Gambling Commission	The regulatory body set up under the Gambling Act 2005 to regulate commercial gambling in Great Britain in partnership with licensing authorities.

Gambling sector	There are seven core sectors that cover the different types of gambling activities available to gamblers. These sectors are also responsible for their own regulation, including self-exclusion (where applicable). These sectors are Arcades (non-remote), Betting (non-remote), Bingo (non-remote) Casinos (non-remote) Remote gambling (online casino, bingo and betting), National Lottery (remote and non-remote) and Large Society Lotteries (remote and non-remote).
GAMSTOP	The Multi-Operator Self-Exclusion Scheme for remote gambling.
General Data Protection Regulation (GDPR)	The regulation in EU law on data protection and privacy. It also addresses the transfer of personal data and supersedes the Data Protection Directive in 2018.
Harm minimisation tool	Tools and policies put in place which aim to prevent or reduce harms, in this case, gambling-related harms.
Impact Evaluation	An assessment of how the intervention being evaluated affects outcomes and whether these effects are intended or unintended.
Land-based operators	Gambling operators that have physical premises, as opposed to those which operate online only.
Literacy / document review	A process to review the current literature on a topic or policy area in order to inform the basis of the evaluation. This may include current schools of thought from academia, any gaps in the research, or help in framing research objectives.
Membership/non-membership venues	Operators that require gamblers to have a membership in order to access facilities vs. those who don't and allow anyone (aged 18+) to visit.
Multi Operator Self Exclusion Scheme	Sector specific self-exclusion schemes that allow gamblers to self-exclude from multiple gambling operators for a set period of time. This can be national, or area specific. More details of each sector scheme are provided in the Executive Summary of the main body of the report.
MOSES	The Multi-Operator Self-exclusion Scheme for betting shops.

Non-problem gamblers, Low risk gamblers, moderate risk gamblers, and problem gamblers	The segment attributed to a gambler as defined by the Problem Gambler Severity Index, typically asked in survey format (see definition below). A gamblers' score defines the severity of how harmful their gambling behaviour is. Risk scores are calculated as follows: **0 (non-problem gamblers)** = Gamblers who gamble with no negative consequences **1-2 (low risk gamblers)** = Gamblers who experience a low level of problems with few or no identified negative consequences **3-7 (moderate risk gamblers)** = Gamblers who experience a moderate level of problems leading to some negative consequences **8 or more (problem gamblers)** = Gambling with negative consequences and a possible loss of control Due to low sample sizes of low, moderate and problem gamblers, we combined these three categories when analysing the survey to create a category named "At Risk"
Non-gambler (survey definition)	A member of the general public who has not partaken in any gambling activity in the past 12 months, as defined by the Gambling Participation Survey.
non-remote operators	Operators that have physical gambling premises.
Operator compliance officer	A senior member of staff responsible for ensuring their company is compliant with regulatory laws around gambling, including gambling-related harms.
Operator frontline staff	Members of staff who work within the operator's gambling premises (sales assistants, managers etc.)
PGSI	Problem Gambling Severity Index. A bank of statements asked in a survey to determine the severity of problem gambling. Participants will be given a score based on their answers to nine statements, which can be aggregated into one of four categories. A total score of between 0-27 is possible, with the scale for each question equating to a score for that statement: Never: = 0 Sometimes = 1

	Most of the time = 2 Almost Always = 3 Therefore, a participant who answered "Almost Always" to each of the nine statements would get the maximum score of 27.
Process Evaluation	Focussing on the implementation process and whether activities have been implemented as intended, including how far outcomes have been addressed.
Process map	A tool that visually describes the flow of work (in this case delivery of Multi-Operator Self-Exclusion Schemes), usually showing a series of events or processes that produce an end result.
Qualitative research	Research that seeks to answer the "how and why" of a research objective or question. Usually semi-structured and more in depth than quantitative research, typically manifested through in-depth interviews or focus groups.
Quantitative research	Research that produces numerical data to explain and quantify opinions, attitudes, behaviours or other defined variables. This can often be used to run statistical significance, or to extrapolate results from a study sample to speak for a wider population. Quantitative research is usually far more structured than qualitative research, usually in the form of a survey.
Remote operators	Operators that offer gambling services online. Many operators will have both remote and non-remote gambling facilities.
Sample/Contact sample	A small defined group selected to take part in research rather than an entire population. Usually selected through a pre-defined procedure called a sample frame. Specific to this evaluation, the contact sample for online groups was reached through the telephone survey with the general public. From this, a sample of gamblers was selected to take part. For the scheme user interviews, sample was provided by scheme owners, and again a selection of scheme users was used in the research.

Scheme users	Gamblers who are currently enrolled on a Multi Operator Self-Exclusion Scheme.
Self-Enrolment National Self-Exclusion (SENSE)	The national self-exclusion scheme for the Casino sector.
Self-exclusion period	The defined timeframe in which a scheme user has self-excluded for. This can range between 6 months and 5 years dependent on the scheme.
Self-exclusion zone	The defined radius of a non-remote self-exclusion, whereby the scheme does not have national coverage.
Single operator self-exclusion	Self-exclusion schemes run by operators, that offer exclusion from their own company only. This can be offered in conjunction with Multi-Operator Self-Exclusion.
Smart Exclusion (IHL Tech)	The company responsible for managing the mechanics of High Street Bingo Multi Operator Self-Exclusion Scheme, and some Arcade premises.
Theory of Change (ToC)	A comprehensive description and illustration of how and why a desired change is expected to happen in a particular context.
Treatment providers	The system for treatment provision for those suffering gambling-related harm. A network of organisations including GamCare, Gordon Moody, and the National Problem Gambling Clinic.
WTFSS	When the Fun Stops Stop. A call to action attached to communication activities around harmful gambling, as part of a campaign run by The Senet Group, an industry funded group created by a number or large gambling operators.

Technical report

Background & objectives

Ipsos MORI has been commissioned to conduct an evaluation of the Multi Operator Self-Exclusion Schemes, on behalf of GambleAware.

This report outlines a detailed technical description of the design, methodology and data outputs used in the first phase of the evaluation, which ran between January 2019 – November 2019.

The Multi Operator Self-Exclusion Schemes are designed to allow individuals experiencing gambling related harm to exclude themselves across a multitude of locations or sites, in order to stop gambling that has fallen out of their control. The scope of the evaluation covers the five existing multi operator schemes for each gambling sector, detailed below:

1. Multi Operator Self-Exclusion Scheme for Betting shops (MOSES)
2. National Casino Forum Self-Exclusion Scheme (SENSE)
3. Bingo Industry Self-Exclusion Scheme (BISES)
4. Online gambling Self-Exclusion Scheme (GAMSTOP)
5. Amusement and Gaming Industry Self-Exclusion Scheme (BACTA)

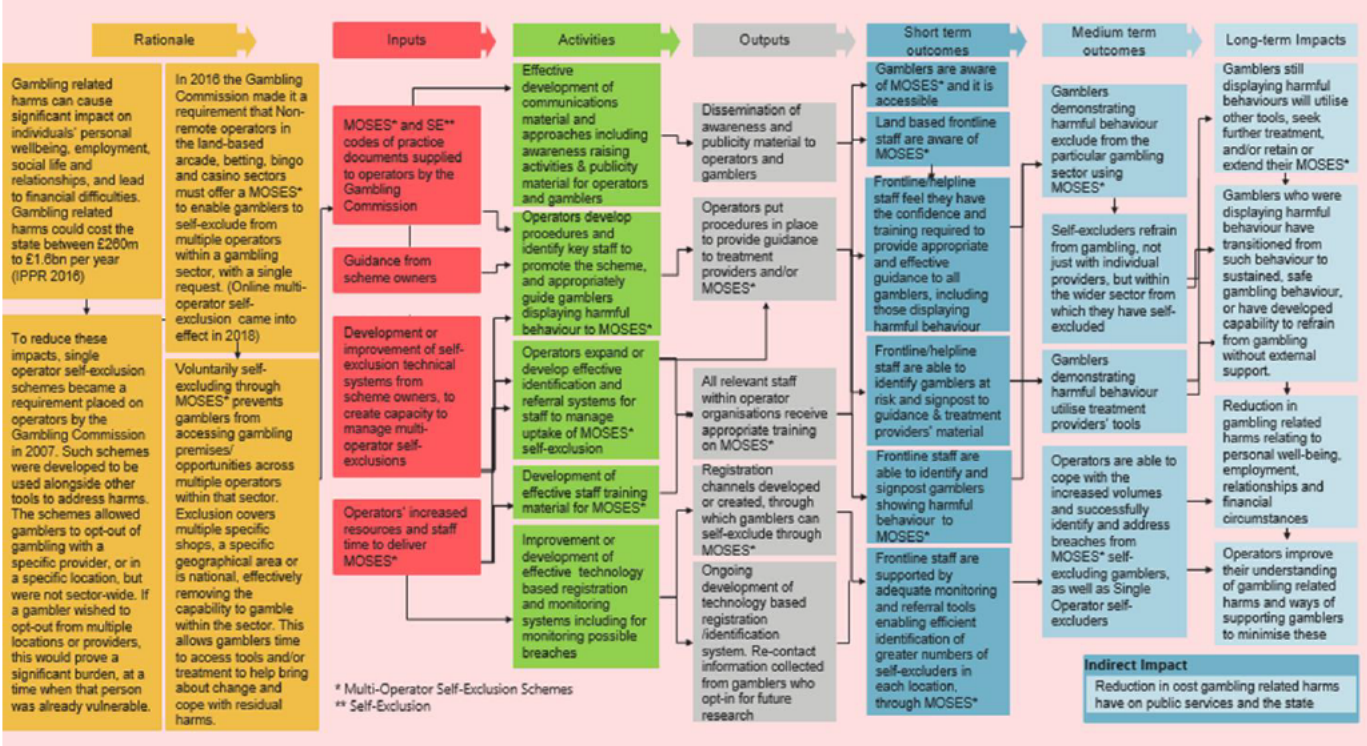
The primary objectives of the research were to:

- Evaluate the effectiveness of the *process* of planning and implementation of the Multi Operator Self-Exclusion Schemes, including enablers and barriers to each scheme running efficiently;

Gather baseline evidence of the *impact* of the schemes, including awareness and perceptions of them amongst gamblers, and how effective they have been for the intended beneficiaries who have registered in helping moderate their gambling behaviour.

Development of Theory of Change (ToC)

Figure 1.1 Theory of Change



The theory of change presented in Figure 1.1 shows our understanding of the causal mechanisms common to all gambling sectors, that are hoped to bring about the desired change with gamblers experiencing harms. The theory of change depicts the key desired short, medium and longer-term outcomes across operators, frontline staff and those experiencing gambling related harm, and the anticipated causal pathways to these resulting from activities and inputs.

In order to ensure a robust theory of change, the core research team at Ipsos MORI undertook an iterative process of development, in collaboration with the steering group, as described below:

1. Literature review of current academic thought on gambling-related harms and where the role of Multi Operator Self-Exclusion sits within the current challenges faced.

2. Familiarisation sessions with individual scheme owners, treatment providers and leading academic to understand the nuances of each scheme, and assess the feasibility of developing one single Theory of Change designed to encompass all schemes.

3. Workshops with operators to gain a further understanding of the enablers and barriers to successful planning, implementation of delivery of the schemes on the ground.

4. Development of a provisional Theory of Change, which formed part of the inception report (also including conceptual framework and a process map).

5. Revisit scheme providers as a sense check against the logic applied to the draft Theory of Change, and re-draft accordingly

6. Review the Theory of Change in a planning meeting for implementation of the phase two evaluation.

Overview of methodology

The table below summarises the methodological approach which has been undertaken to deliver this evaluation. The remainder of the report will take each of these methodological approaches in detail.

Table 7.1: Summary of the Methodological Approach

Method	Rationale
1 x familiarisation interview with each of the 6 scheme owners across sectors 2 x follow up interviews with each scheme owner to discuss the TOC 1 x final interview with each scheme owner to plug knowledge gaps	to gain a better understanding of the processes underpinning the MOSES implementation, as well as barriers for self-exclusion and context for this evaluation as well as determining the feasibility of using contact sample of self-excluders.
2 x familiarisation interviews with treatment providers and 2 x academics	to gain a clearer understanding of the journey those experiencing gambling-related harms through ultimately leading them to self-exclude. These interviews also provided insight around the ethics and best ways to approach the subject with those experiencing harms.
1 x extended focus group was carried out with 14 frontline staff working in gambling premises across the land-based gambling sectors	to gain a better understanding of the day-to-day working of the MOSES, and perceptions from staff on the take- up, success and limitations.
1 x workshop with 19 operators' compliance officers across gambling sectors, including the remote gambling sector	to gain a better understanding of the ideas and principles guiding the implementation of MOSES, including the dissemination of information and training to staff, mechanisms for signposting problem gamblers to MOSES, and enablers and barriers to the consistent execution of processes supporting the MOSES and satisfied customers.
Document and dataset review (GambleAware, the Gambling Commission and Dr Adrian Parke, our partner academic suggested relevant documents and datasets)	to aid the development of the conceptual framework and to provide context for this evaluation.

A telephone survey of 1,500 with the general public, with a boost of gamblers	to gather evidence on general public and gambler awareness of self-exclusion schemes, and some top-level attitudes and perceptions. The re-contact sample was also used to recruit gamblers to take part in online focus groups.
5 x online focus groups with gamblers in each sector	to explore in further depth awareness and attitudes towards multi operator schemes amongst gamblers in each sector. This sample did not include those that had taken part in a multi operator scheme.
42 x depth interviews with scheme users	to gather qualitative evidence from users of the five schemes on the effectiveness of the schemes, and some early evidence of impact.

Scheme provider interviews

Ipsos MORI made initial contact with a representative from each of the six scheme providers in order to gain an informed understanding of each individual scheme through a familiarisation interview.

A discussion guide was created to gain insight into perceptions of the scheme's strengths and weaknesses within the specific sector, internally identified areas of potential improvement and the perceived impacts upon gamblers experiencing harms. A member of the Ipsos MORI core project team each took responsibility for two sector contacts (which remained consistent throughout the process) and liaised throughout various stages of the evaluation. This included acquiring sample for the scheme user in-depth interviews, development and discussion around the Theory of Change and to factcheck scheme specific clarifications at reporting stage.

Frontline staff and compliance officer workshops

Ipsos MORI conducted a focus group with 14 frontline staff representatives from across the four non-remote gambling sectors, with representation of two operators per sector. These staff members were contacted/nominated by senior compliance officers who participated in a further workshop and whose details were provided by the Gambling Commission.

A discussion guide was developed using the draft process map and theory of change, in order to gain a deeper understanding of the experiences of frontline staff across the four non-remote sectors. This was done under the guidance of GambleAware and The Gambling Commission. The guide was designed to meet the following research objectives:

- To understand the planning and implementation of MOSES in the gambling industry, and across gambling sectors;
- To explore the commonalities or differences of how MOSES is implemented and delivered across the five gambling sectors (casinos, bingo, remote, betting shops and arcades);
- To identify potential improvements in how MOSES is implemented and delivered to encourage take up;
- To explore the ways in which technology can support the implementation and delivery of MOSES (e.g. are there limitations and/or barriers to introducing technology assisted identification of problem gamblers?); and

- To understand how current arrangements of identifying customers who have signed up to MOSES is working in practice.

Learnings were taken from this session and used to inform the design of the discussion guide used at the operator workshop. In total, 19 compliance officers from across all five gambling sectors including the remote gambling sector attended this workshop, where they were split into sector specific moderating tables. The objectives here were the same as above, however, moderators were invited to probe on learnings from discussions with frontline staff, and explore potential differences in approach between operators both large and small within the individual sectors. Plenary exercises were also included between sessions to encourage group feedback and knowledge sharing between sectors.

The frontline staff focus group took place on 1st March 2019 during the afternoon as attendees had been nominated by their employers to attend. The group lasted roughly 2 hours and was held at the Ipsos MORI North offices in Manchester.

The operator workshop took place on the afternoon of 19th March 2019 at the Gambling Commission offices in Birmingham and was roughly 4 hours in length.

Quantitative survey

Methodology

Ipsos MORI carried out a quantitative study, in order to gather top-level evidence of awareness and perceptions of Multi Operator Self-Exclusion Schemes amongst the general public, with a particular focus on those who gamble.

A Computer Assisted Telephone Interviewing (CATI) survey was conducted with 1,500 UK adults aged 18+. Within this, 1,000 of those interviewed were gamblers, and 500 non-gamblers. This approach was chosen to ensure that statistical sub-group analysis could be done within the gambler sample population, while still being able to assess a flavour of the wider general public perceptions at an overall level.

For the purpose of the survey analysis, gamblers were defined as those who have partaken in any gambling activity in the past 12 months, excluding those who have taken part in the National Lottery or bought scratch cards *only*. We also determined a sub-group of recent gamblers by asking the same question of those who gamble but stipulating gambling activity within the past four weeks. Further to this, we also asked the Problem Gambler Severity Index (PGSI) in order to analyse a sub-group of "At risk" gamblers – a combination of those who score low, moderate or problem gambler scores in the index.

Quotas were set on age, gender, region and working status to ensure the sample was broadly representative of the profile within each audience (gamblers and non-gamblers). Table 1.2, below, shows the final achieved quotas.

Table 7.2: Telephone survey quota targets vs. actual figures

	Gamblers (1000)		Non-Gamblers (500)	
GENDER	**tgt %**	**act %**	**tgt %**	**act %**
Male	54%	55%	46%	45%
Female	46%	45%	54%	55%
AGE				
18-24	15%	7%	15%	8%
25-34	22%	13%	15%	10%
35-44	19%	17%	16%	15%
45-54	12%	23%	12%	13%
55-64	15%	24%	16%	25%
65+	18%	14%	27%	29%
REGION				
North East	5%	6%	4%	3%
Yorkshire & Humber	9%	9%	8%	6%
East Midlands	7%	7%	8%	6%
Eastern	10%	9%	10%	12%
Greater London	11%	13%	14%	17%
South East	14%	14%	14%	14%
South West	9%	9%	9%	9%
West Midlands	9%	9%	9%	10%
North West / Merseyside	11%	12%	12%	12%
Wales	5%	3%	5%	3%
Scotland	10%	8%	8%	7%
EMPLOYMENT STATUS				
Working (full-time or part-time)	64%	76%	51%	61%
Not working	36%	24%	49%	39%
Other		0%		1%

Data were then weighted to match the overall sample to that of the known profile of gamblers and non-gamblers in the Great Britain order to counteract non-response bias. Table 1.3 and Table 1.4 below shows the weights applied to each group in order to match the representative profile at a national level. Data were weighted to gambler vs. non-gambler overall, and then within the two audiences, a separate weighting scheme was applied by gender, age and work status.

Table 7.3: Telephone survey weighting profile of gamblers vs. non gamblers for overall British public

	Weighted Proportion	Gambler
Non-Gambler	57.72%	570
Gambler	42.28%	430

Table 7.4: Telephone survey weighting scheme

	Non-Gambler	Gambler
Male	26%	23%
Female	31%	20%
	Non-Gambler	**Gambler**
18-24	8%	6%
25-34	9%	9%
35-44	9%	8%
45-54	7%	5%
55-64	9%	6%
65+	15%	8%
	Non-Gambler	**Gambler**
Working (full-time or part-time)	29%	28%
Not working	28%	15%

Design

Ipsos MORI worked alongside GambleAware and the wider steering group[34] to produce a quantitative questionnaire that explored the following themes:

- Overall gambling behaviour, including categorisation of sector-specific gambling and those displaying harmful gambling behaviour . Commonly used measures of gambling behaviour were used in consultation with the Gambling Commission, such as the Problem Gambling Severity Index (PGSI) and the Attitudes Towards Gambling Scale (ATGS)
- General perceptions towards self-exclusion, including awareness and take-up of both single and multi operator schemes, and some specific attitudinal measures of those who are aware
- Awareness and use of other harm-minimisation tools that might supplement self-exclusion
- Demographic questions for quota purposes.

[34] The wider steering group included members from GambleAware, including evaluation consultant Prof. David Parsons, and the Gambling Commission.

Once agreed and signed off by the steering group, Ipsos MORI's data processing team used a programme called Dimensions to create a computer assisted script for interviewers to code participant's answers. Ipsos MORI's research team then checked this script to ensure there were no spelling or routing errors before commencing with fieldwork. During fieldwork, participant responses were then inputted into Dimensions, forming the raw dataset.

Data outputs and reporting

Upon finishing the fieldwork, Ipsos MORI's data processing team produced an aggregated, anonymised data set in the form of:

- **Excel toplines** – this spreadsheet contained the final weighted results for each question, with total columns for gamblers and non-gamblers which could be shared outside the immediate research team.
- **Data tables** – these showed the results for each question, but allow for bivariate analysis via a number of demographic and attitudinal cross-tabulations. The tables also included significance testing at the 95% confidence level, using letters to show where any differences between sub-groups are statistically significant, meaning we can confidently say there is indeed a true difference between these groups. In the charts provided in the report we indicated positive significant differences in green and negative significant differences in red.

Ipsos MORI also produced a short Word 'Key Findings' summary which was disseminated amongst GambleAware and the wider steering group. The quantitative findings have also been used to inform the evaluation research questions in distinct sections of the main phase one report.

Online focus groups with gamblers

Methodology

Following the quantitative study, Ipsos MORI undertook five online focus groups with gamblers from each sector included in the study (Betting, Online, Bingo, Arcade & Casinos). The purpose of the groups was to explore awareness and attitudes towards each scheme in more depth.

Because some topics of the discussion could be considered quite sensitive, it was decided that conducting focus groups online would the most appropriate methodology – participants tend to be more comfortable sharing experiences online than in person, and it allowed potentially vulnerable adults to do this anonymously.

Online programme Adobe Connect was used to facilitate the groups. This programme allowed moderation of a focus group via a shared online forum, where only those recruited to take part could receive the link. Once joining the forum, focus group members share the online platform with the moderator and any observers. Adobe Connect also allows the moderator to share multimedia content with participants, useful for testing materials.

In terms of recruitment, Ipsos MORI used the sample from the quantitative questionnaire in order to reach gamblers. The recruitment team sent an email and followed up with a call using the sample collected made up of those who agreed to be re-contacted.

It was important to recruit participants that gamble in each sector in order to test each relevant scheme with gamblers who may be prospective users. Therefore, hard quotas were set on recruiting c.10 gamblers from each of the five sectors per focus group. In order to reach a balanced sample broadly reflecting different demographics of people who gamble, additional soft quotas were also set on the following:

- **Recent gamblers** (those who had gambled in the past four weeks)
- **Problem gamblers, moderate risk gamblers and low risk gamblers** (as defined by their PGSI[35] score collected in the survey)
- **Heard of self-exclusion**
- **Taken part in self-exclusion** (but NOT multi-operator schemes).

Other soft quotas: we also monitored the following variables to ensure we have a good mix of people:

- Age and gender (good mix within each)
- Education level
- Working status.

Design

Ipsos MORI designed a core topic guide, again with guidance from GambleAware and the wider steering group. Academic expert Dr Adrian Parke was also consulted, alongside Ipsos MORI's internal ethics team, to ensure that the guide was designed in an ethically robust manner.

The guide was designed to meet the following objectives:

- To what extent gamblers feel supported by operators, and how well they are signposted to further support
- How effectively operators are communicating about Multi Operator Self-Exclusion, and how clear and effective communications and implementation systems are
- Gamblers' personal or proxy experiences of self-exclusion systems in practice, and of breaches or attempted breaches

[35] Problem Gambling Severity Index

- To what extent do gamblers experiencing harms and gamblers more widely, see Multi Operator Self-Exclusion as the recommended route to self-exclusion? (How) do Multi Operator Self-Exclusion Schemes complement or compete with other self-exclusion systems?
- Post Multi Operator Self-Exclusion, what are the key barriers and enablers in helping gamblers to reduce or stop their gambling?

Once the core set of questions were agreed, five sector-specific guides were produced, with distinct prompt questions in each. The guides comprised of the following core themes:

- General gambling behaviours, including relationships with others and interactions with staff
- Needs for support, staying in control of gambling
- Awareness and experience of multi operator self-exclusion schemes
- Materials testing – each group asked to look at scheme-specific communication materials
- Further help – support needed alongside self-exclusion.

In addition to the guides, Ipsos MORI also produced a participant information sheet and privacy policy to inform participants of the relevant data protection protocols in order for them to give informed consent to take part.

Fieldwork took place between the 22nd – 26th July 2019, during the evening to maximise participant availability. Each focus group was roughly 90 minutes long and took place between a window of 6-9:30 PM.

Participants were given £40 in Amazon vouchers as an incentive for taking part and were emailed these shortly after completing the groups.

Data outputs and reporting

Adobe connect automatically records the forum transcripts, which were used by the Ipsos MORI research team to inform the analysis. An analytical framework was produced, designed to map findings from each group to the relevant evaluation objectives. Ipsos MORI also hosted a verbal debrief with the steering group to communicate the top-level findings.

This was used to inform the main evaluation report in each relevant section, along with anonymised verbatim directly taken from the transcripts.

Depth interviews with scheme users

Methodology

The final stage of the fieldwork was to complete 42 qualitative depth interviews with users of the five multi operator self-exclusion schemes.

The purpose of the research was to determine the effectiveness of the schemes for its users, and to gather qualitative evidence of the enablers / barriers to this from the perspective of the beneficiary.

These interviews took place via telephone, and were conducted by the core evaluation research team at Ipsos MORI, as follows:

- 12 pilot interviews to test the topic guide, followed by a pause and reflect phase and feedback to the steering group. Originally, these had been planned as cognitive interviews, i.e. building in some feedback on the questions themselves (how easy are they to understand, is this question relevant etc.). However it was decided that given the nature of the audience in these interviews, it was felt that interrupting personal stories of gambling problems to ask cognitive testing questions would be insensitive. Therefore it was decided that these interviews would be pilots, and instead the team built in a "pause and reflect" where learnings from the interviews were applied and used to tweak the guide ahead of the full interview phase.

- 30 mainstage interviews, following tweaks made to the topic guide. These interviews spread evenly across each gambling sector to ensure we gained sufficient qualitative data on each scheme.

For this stage, Ipsos MORI worked alongside each individual scheme owner who held the sample of users. A few months prior to the fieldwork, scheme owners were asked to start collecting re-contact permission from users in order to be eligible sample for the research.

After finalising individual Data Sharing Agreements with each scheme-provider, Ipsos MORI received sample with the contact details of each participant, along with any relevant demographic information. Ipsos MORI's recruitment team then contacted individuals from each team, collecting demographic information as part of a screening process.

As with the online groups, it was important to ensure research was conducted with a broad range of participants in order to broadly reflect the demographic profile of scheme-users. Aside from hard quotas on each sector to ensure an even spread, quotas were also set on demographic variables, as shown in Table 1.4.

It is worth noting that many participants tended to be registered across more than one Multi Operator Self-Exclusion Scheme, and therefore may have appeared in more than one sample. Therefore, participants were sometimes recruited from one sample but qualified for a different sector interview. GAMSTOP (online self-exclusion) did not collect re-contact information for a third party, and therefore could not provide a sample to Ipsos MORI. GAMSTOP therefore took a different approach by emailing 120 scheme-users asking them to opt in. Just one person responded via opting in, and all other GAMSTOP interviews were recruited from other sample sources.

Table 7.5: Scheme user depth interview quotas

Group	Quota target	Priority	Sourced directly from sector sample	Achievement (total)
Betting	8	High	6	8
Casino	9	High	10	9
Arcade	8	High	13	8
Bingo – High Street	4	High	7	4
Bingo – Arcade Gaming Centres	3	High	4	3
Bingo – Trade	1	High	1	1
Online	9	High	1	9
Self-exclusion	**Quota target**	**Priority**		**Achievement**
1-3 months	12	Medium		9
3-6 months	15	Medium		8
6 months +	15	Medium		24
Age Group	**Quota target**	**Priority**		**Achievement**
18-24	7	Medium		4
25-34	14	Medium		17
35-54	14	Medium		15
55+	7	Medium		6
Gender	**Quota target**	**Priority**		**Achievement**
Male	30	Medium		30
Female	12	Medium		12

Design

As with the previous materials, Ipsos MORI worked alongside the wider steering group to produce a topic guide for the scheme-user interviews. Ipsos MORI also worked alongside academic Dr Adrian Parke, an expert in gambling related research, and its own internal ethics board to ensure the topic guide was ethically robust. This process was particularly important given the possibly sensitive nature of some questions, such as asking gamblers to recall their own experiences of problem gambling.

The objective was to understand scheme-users experience of taking part in each Multi Operator Self-Exclusion scheme, in terms of:

- Ease of registration processes;
- Effectiveness of the scheme in controlling harmful gambling;
- The impact of the scheme in terms of how they feel about their gambling now and in the future.

In order to assess these objectives, Ipsos MORI produced a guide designed to follow the "gambling journey" of the scheme-user, using the following structure:

- First experiences of gambling, and first feeling they might have a gambling-related problem
- Doing something about this, e.g. seeking out support or self-excluding
- Registration processes of the Multi Operator Self-Exclusion scheme(s) they had enrolled on
- Effectiveness of the scheme (whether it has helped to control their gambling and whether they have breached it)
- Impact of the scheme – how they feel about their gambling looking ahead to when their self-exclusion scheme ends in the future.

The fieldwork took place between 18 September – 25 October 2019. Interviews were approximately 45 minutes and participants were paid £30 in Amazon vouchers as an incentivisation for taking part. As there were no substantial changes to the discussion guide following the initial pilot interviews, these 12 interviews were also included within the main framework analysis.

Data outputs and reporting

All interviews were transcribed, before being anonymised and input into a common analysis framework that was structured around the salient evaluation objectives. This analysis sheet helped inform the thematic commonalities across interviews as discussed in the main report.

A verbal analysis session was also hosted by Ipsos MORI, which was attended by members of the steering group. This was again used to draw on common themes and was focussed on answering the evaluation outcomes framework.

Quotes from the analysis sheet have been used to support thematic findings in the main report throughout. All quotes are anonymised but do show gender, age (for interviews with scheme users only) and which sector the quote has originated from.

Telephone survey questionnaire

Multi-Operator Self-Exclusion Schemes Questionnaire

General gambling habits & attitudes

The next few questions relate to gambling behaviours. Even if you don't gamble, we're interested in hearing from a cross-section of people

ASK ALL

Q1 Which of the following, if any, have you spent money on in the past 12 months?
Please mention all that apply.

1. Tickets for National Lottery Draws that you buy in person
2. Tickets for National Lottery Draws that you buy online
3. Scratch Cards
4. Gaming machines in a bookmakers
5. Fruit or slot machines in pubs, arcades, casinos
6. Bingo (including online)
7. Roulette, Poker, Cards or Dice in a Casino
8. Betting on horse or dog races online or in person
9. Betting on football online or in person
10. Betting on other sports or events online or in person
11. Online casino games (slot machine style, roulette, poker, instant wins)
12. Any other type of gambling
13. None of the above
14. Don't know

ASK THOSE WHO HAVE GAMBLED IN PAST 12 MONTHS (CODES 1-12 AT Q1)

Q2 And which of these, if any, have you spent money on in the past 4 weeks?
Please mention all that apply.

1. Tickets for National Lottery Draws that you buy in person
2. Tickets for National Lottery Draws that you buy online
3. Scratch Cards
4. Gaming machines in a bookmakers
5. Fruit or slot machines (not online)
6. Bingo (including online)
7. Roulette, Poker, Cards or Dice in a Casino
8. Betting on horse or dog races online or in person
9. Betting on football online or in person
10. Betting on other sports or events online or in person
11. Online casino games (slot machine style, roulette, poker, instant wins)
12. Any other type of gambling
13. None of the above
14. Don't know

ASK All

Q3. Thinking generally about gambling, how strongly do you agree or disagree with each of the following statements?

1. **There are too many opportunities to gamble nowadays**
2. **Most people who gamble do so sensibly**

1. Strongly agree
2. Tend to agree
3. Neither agree nor disagree
4. Tend to disagree
5. Strongly disagree
6. Don't know

ASK ALL; OPEN-ENDED

Q4. If you were concerned that someone you know might have a problem with gambling that is causing them harm, what would you tell them, if anything, to do for support?

1. OPEN ENDED TEXT BOX
2. Nothing
3. Prefer not to say

ASK ALL GAMBLERS (CODES 2-12)

Q5. Thinking about your own gambling or betting now. Thinking about the last 12 months…

1. Have you bet more than you could really afford to lose?
2. Have you needed to gamble with larger amounts of money to get the same excitement?
3. When you gambled, did you go back another day to try and win back the money you lost?
4. Have you borrowed money or sold anything to get money to gamble?
5. Have you felt that you might have a problem with gambling?
6. Has gambling caused you any mental health problems, including stress or anxiety?
7. Have people criticised your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?
8. Has your gambling caused any financial problems for you or your household?
9. Have you felt guilty about the way you gamble or what happens when you gamble?

1. Never
2. Sometimes
3. Most of the time
4. Almost Always
5. Don't know
6. Prefer not to say

BLOCK 3: AWARENESS OF SELF-EXCLUSION AND MOSES

INTERVIEWER TO READ OUT

Now I'd like to ask you about self-exclusion schemes within the gambling industry.

Self-exclusion is a tool that can be used by individuals who wish to stop gambling for a period of time – a minimum of six months. The individual voluntarily registers and then gambling companies will take steps to prevent them from gambling with them. Individuals can exclude themselves from one company, or multiple companies in a specific type of gambling industry (such as betting shops, casinos or bingo) in a particular area or online. When you self-exclude from more than one company with a single request this is called a Multi-Operator Self-Exclusion Scheme.

ASK ALL

Q6. Before this interview, how much, if anything, would you say you know about self-exclusion schemes within the gambling industry?

1) A great deal
2) A fair amount
3) Just a little
4) Heard of them, but know nothing about them
5) Never heard of them
6) Don't know

ASK IF HEARD OF SELF-EXCLUSION (CODE 1 - 4 AT Q6)

Q7. How did you first hear or find out about self-exclusion schemes within the gambling industry?

On premises

1. Flyers/posters advertised in a gambling establishment
2. On a digital/video advertisement in a gambling establishment
3. Leaflet in the gambling establishment
4. Signposted to it by a member of staff

Online/phone

5. Saw it on a gambling / betting website
6. Saw it on a gambling support website (e.g. GambleAware.org / GAMSTOP)
7. Via a gambling support service (e.g. National Gambling Helpline)
8. Searched for it (e.g. google)
9. Read about it on social media (e.g. Facebook, Twitter, Instagram)
10. On an online advert/video (e.g. YouTube)

Other people

11. I know somebody who has self-excluded
12. friends/ family/colleagues/
13. Other people who gamble
14. Heard about it from a health professional

Other

15. Heard it on a TV / radio advert
16. Other (write-in)
17. Don't know / Not sure
18. Prefer not to say

ASK IF HEARD OF SELF-EXCLUSION (CODE 1 - 4 AT Q6)

Q8. And have you ever registered to a self-exclusion scheme within the gambling industry?

1. Yes – currently self-excluding
2. Yes – in the past
3. No – but have considered it
4. No – have not considered it
5. Don't know/not sure
6. Prefer not to say

ASK THOSE WHO HAVE SELF EXCLUDED (Q8 CODES 1-2)

Q8.b In your opinion, to what ~~extend~~ extent did self-exclusion help stop or limit your gambling?'
REVERSE STATEMENTS SINGLE CODE

1. To a great extent
2. To some extent
3. Hardly at all
4. Not at all
5. Don't know/can't remember

ASK THOSE WHO HAVE SELF EXCLUDED (Q8 CODES 1-2)

Q9. From which of the following, if any, types of gambling have you self-excluded from?

1. Betting shops or bookies (including race tracks)
2. Online betting websites
3. Casino
4. Arcades
5. Bingo hall of which I am a member
6. Bingo hall of which I am not a member
7. None of these
8. Prefer not to say

Now I'd like to talk to you about Multi Operator Self Exclusion Schemes, where individuals can self-exclude from multiple companies in a specific type of gambling industry.

ASK ALL WHO HAVE HEARD OF SELF_EXCLUSION (Q6 CODES 1-4)

Q10. Before this interview, how much, if anything, would you say you know about the Multi Operator Self Exclusion Schemes such as SENSE or GAMSTOP?

1) A great deal
2) A fair amount
3) Just a little
4) Heard of it, but know nothing about it
5) Never heard of it
6) Don't know

ASK IF HEARD OF MOSES (CODE 1-4 AT Q10)

Q11. How did you first hear or find out about Multi Operator Self Exclusion Schemes?

On premises

1. Flyers/posters advertised in the gambling establishment
2. On a digital/video advertisement in a gambling establishment
3. Leaflet in the gambling establishment
4. Signposted to it by a member of staff

Online/phone

5. Saw it on a gambling / betting website
6. Saw it on a gambling support website (e.g. GambleAware.org / GAMSTOP)
7. Via a gambling support service (e.g. National Gambling Helpline)
8. Searched for it (e.g. google)
9. Read about it on social media (e.g. Facebook, Twitter, Instagram)
10. On an online advert/video (e.g. YouTube)

Other people

11. I know somebody who has self-excluded
12. friends/ family/colleagues/
13. Other people who gamble
14. Heard about it from a health professional

Other

15. Heard it on a TV / radio advert
16. Other (Type in)
17. Don't know / Not sure
18. Prefer not to say

ASK THOSE WHO HAVE SELF-EXCLUDED AND HEARD OF MOSES (Q8 CODES 1-2 AND Q10 1-4

Q12. Earlier you mentioned that you have participated in a self-exclusion scheme within the gambling industry. Does this include a Multi-Operator Self-Exclusion Scheme?

1. Yes
2. No – but have considered it
3. No, have not considered it
4. Don't know
5. Prefer not to say

ASK THOSE WHO HAVE SELF-EXCLUDED USING MOSES (CODE 1 AT Q12)

Q13. Are you currently taking part in a Multi Operator Self-Exclusion Scheme, or was this in the past?

1. Currently taking part
2. In the past
3. Don't know
4. Prefer not to say

ASK THOSE WHO HAVE SELF-EXCLUDED USING MOSES (CODE 1 AT Q12)

Q14. And from which of the following types of gambling, if any, did you register to a multi operator self-exclusion scheme for?

1. Betting shops or bookies (including race tracks)
2. Online betting websites
3. Casino
4. Arcades
5. Bingo hall of which I am a member
6. Bingo hall of which I am not a member
7. None of these
8. Prefer not to say

BLOCK 4: ATTITUDES TOWARDS MOSES/ SELF EXCLUSION

ASK ALL LOW, MODERATE AND HIGH-RISK GAMBLERS (INDEX SCORE = 1-3) BUT NOT SELF-EXCLUDED (Q8 CODES 3-6). OPEN ENDED QUESTION ALLOW FOR DON'T KNOW. INTERVIEWER TO CODE TO PRE-CODE LIST

Q15. If you ever got to the point in which you had concerns about the amount of time or money you spent gambling, what, if anything, would prevent you from taking part in a self-exclusion scheme?

ASK ALL GAMBLERS WHO HAVE NOT USED SELF-EXCLUSION (Q8 CODES 3-6)

Q16. Which of the following, if any, have you done to help you cut down the amount of time or money you spend gambling?

1. Talked to or received advice and counselling from friends, family, colleagues or someone else you know
2. Talked to or received advice and counselling from a gambling related charity, helpline or other support organisation
3. Talked to or received advice and counselling from a charity or support organisation that is not specifically gambling related
4. Used tools to help limit your gambling e.g. deposit limits, timeouts, blocking software
5. Received treatment from a GP or health professional
6. Other (Please specify)
7. Nothing
8. Prefer not to say

ASK ALL WHO HAVE SELF-EXCLUDED (Q8 CODES 1-2)

Q16.b. Other than self-exclusion, which of the following, if any, have you done to help you cut down the amount of time or money you spend gambling?

1. Talked to or received advice and counselling from friends, family, colleagues or someone else you know

2. Talked to or received advice and counselling from a gambling related charity, helpline or other support organisation
3. Talked to or received advice and counselling from a charity or support organisation that is not specifically gambling related
4. Used tools to help limit your gambling e.g. deposit limits, timeouts, blocking software
5. Received treatment from a GP or health professional
6. Other (Please specify)
7. Nothing
8. Prefer not to say

Discussion guide for gamblers online focus groups

Introduction and warm up (5-10 mins)

My name is XXXX and I'll be moderating our online chat today on behalf of Ipsos MORI, the independent research company.

- The discussion will last up to an hour and a half.
- It's more an informal chat than a 'survey' or 'interview'. Please feel free to chip in with whatever you think, whenever you think it.
- I won't judge you on your spelling if you promise not to judge me on mine!
- There are no right or wrong answers.
- You can choose to not answer a question or leave the discussion completely at any point.
- Everything you say is completely confidential and information collected is anonymised.
- Only your [screen name] can be seen by the others in the chat, never your real name or email address.
- We will write a report at the end of this research project. We might use quotes, but we won't name anyone, identify you personally, or say who has said what.

- We will be talking about feeling in control of gambling, and what happens when people no-longer feel in control. If you would like to talk more about any of the things we raise in this group, you can find free, confidential support and advice about gambling by visiting the GamCare website at www.gamcare.org.uk or calling their freephone number 0808 802 0133. I'll repeat these details at the end of the group, or you can email me and I will send them to you.

Does anyone have any questions before we start?

****

SPEND UP TO 5 MINUTES ON THIS – ALLOW SUFFICIENT WARM UP/ICE BREAKER.

Ok. Let's kick off by talking a little bit about you.

We're here to talk about gambling in [SECTOR FOR PARTICULAR GROUP], so can everyone share a gambling experience that comes to mind?

Setting the scene (15 minutes)

Thanks for sharing that.

Now, I'd like to change the focus, and talk about where you gamble. Remember there are no right or wrong answers – we are simply interested in what you think. Everything you say here is completely confidential and anonymous.

We have invited you to this group, because you told us in the telephone survey that you sometimes gamble in [Shop/Casino/Online].

Do you have one or more favourite [Shop/Casino/Online], or do you go wherever?
- [Those who have a favourite] What makes a place your favourite?
- What do you like about the place(s) where you gamble?

- Anything you dislike or that puts you off?

Thinking about when you go in:
- What information are you looking for when you arrive at the [Shop/Casino/Online]?
    - How is it presented to you? e.g. Odds, offers, options to bet

Thinking about other people you see while you are there:
- Who, if anyone, do you see when you're in there?
    - [If needed] What about staff?
    - [If needed] What about other customers?

What kinds of contact do you have with these people?
- Does this contact with others add to or take away from your experience of gambling?
    - In what ways?

Needs for support (10 minutes)

People who use **[Shop/Casino/Online]** can sometimes develop gambling related problems.

- How do you know you are in control when you're gambling?
- Are there ever times when you think you might not be in control when you're gambling?
    - What about after you gamble?
    - Do you ever think you might have gambling related problems?

- What is it that makes you think you are not in control in relation to gambling?

- What about others you know or people you see / have contact with when you're gambling?
    - What makes you think or feel that others are not in control?

We've talked a bit about how you view being 'in control' when gambling. Just so we are talking about the same thing, when we talk about <u>not being in control</u>, we mean any of the following:

- Betting more than you could really afford to lose;
- Needing to gamble with larger amounts of money to get the same excitement;
- Going back another day to try and win back the money you lost;
- Borrowing money or selling things to get money to gamble;
- Feeling that you might have a problem with gambling;
- Gambling causing you mental health problems, including stress or anxiety;
- Having people criticise your betting or tell you that you had a gambling problem, regardless of whether or not you thought it was true;
- Gambling causing financial problems for you or your household;
- Feeling guilty about the way you gamble or what happens when you gamble.

Thinking again about the **[Shop/Casino/Online]** where you gamble, the information available to you there, and the people you have contact with when you are gambling:
- Do you feel supported to stay in control when you are gambling?
    - How are you supported in the place(s) where you gamble?

- If you started to feel you needed more support to stay in control of your gambling, would you look for this support in the casino(s), or somewhere else?
    - Why do you say that?

- Do you think staff in the [Shop/Casino/Online] where you gamble are able to help you and others find more support, if you need it?
    - Why do you say this?
    - What kind(s) of support can they help you and others find?

Awareness and experience (20 minutes)

If someone thinks they may be spending too much time or money gambling, they can use 'self-exclusion' schemes to help them stop gambling for a period of time.

- Has anyone heard of self-exclusion schemes before today?
- What do you know about self-exclusion schemes?
    - Can you name any?
    - How do you know about them?

- Has anyone in the group had experience of self-exclusion schemes? Either personally, or through others you know?

- In the casino(s), have you ever seen anyone be turned away because they have already self-excluded?

- There are two types of self-exclusion schemes:

- Single operator self-exclusion schemes, where you can self-exclude from one location, or all of the locations in a chain; and

- Multi-operator schemes, where you can self-exclude from multiple locations, across multiple chains. These are specific to one sector of gambling, e.g. betting shops, casinos, arcades, bingo, or online betting.

    - Is it useful to be able to exclude from just one location or just one provider?
    - Is it useful to be able to exclude from multiple locations or providers within a sector?

- With [Shop/Casino/Online], you must exclude from all land-based casinos, rather than selecting specific [Shop/Casino/Online]or a specific area to be excluded from.
    - What are the pros and cons of this?

- What about the length of the exclusion? For casinos this is a minimum of 6 months from when you self-exclude, with no option to opt back in sooner. Is this too short, too long, about right?
    - Do you think the length of the exclusion might put you off self-excluding through the scheme?
    - Why do you say that?

- With the [Sector] self-exclusion scheme, you are not automatically able to gamble again after the six months is up, but remain excluded until you ask for the self-exclusion to be lifted.
    - What do you think about this?

The existing multi-operator schemes are sector specific (e.g. just shops/casinos, just online gambling). Some people think it would be useful to have a scheme which allowed you to opt out across all sectors in one request.

- How useful or not do you think this would be for you personally? Why / why not?
- What about others you know? Why?
- Thinking generally, do you tend to gamble across more than one sector? The sectors for the purpose of this research are: Bookmakers, Casinos, Arcades, Bingo, and Online gambling?
    - Thinking about how you gamble, do you tend to stick to one sector, or gamble across multiple sectors?

- Do you think you can be out of control when gambling in one sector, but in control of your gambling in other sectors? Why do you think this is?

Materials testing (15 minutes)

I'm now going to show you some information about a specific self-exclusion scheme. This relates to the **[Shop/Casino/Online]** scheme, which is known as **[Scheme name]** [SHOW LEAFLET, AND BRIEFLY OUTLINE THE SCHEME FOR THOSE NOT AWARE OF IT].

- Can everyone see that ok? Please can you spend a few minutes reading through?

[ALLOW A FEW MINUTES FOR PEOPLE TO READ THE MATERIALS]

- Have you seen this leaflet before? Where?
- Those who have not heard of [Scheme name], does this prompt any awareness?
- How clear and effective are the communications?
  - From reading this, are you clear on how you go about self-excluding?
  - Are you clear on how long self-exclusion is for?
  - What could be improved?

  - The process for self-excluding is as follows:
    - [Specific scheme process explained here]

- Thinking about [Scheme name] and other self-exclusion schemes you are aware of, what are the differences?

- (How) Does [Scheme name] complement or compete with other self-exclusion systems?

- [THOSE WHO WERE NOT PREVIOUSLY AWARE OF THE SCHEME]

- Would you consider using this scheme?
  - Why? Why not?
  - In what context do you think you might consider self-excluding through SENSE?

- Do you think **[Shop/Casino/Online]** are meeting their obligations with respect to the self-exclusion scheme?
  - Why do you say that?

Further help (10 minutes)

Thinking about if you or others you know ever chose to use the [Scheme name] scheme:

- What help might someone need alongside self-exclusion?
- PROBE IF NECESSARY: What about support and treatment? Blocking bank transactions? Gambling Blocking Software?
  - Who should tell you where to find this help?
  - Who should provide this help?
  - Can you think of anything that might get in the way of someone taking-up help of this kind, if it were offered?
    - How do you think people could get around this barrier?

- What help do you think those who self-exclude are pointed to?
  - How do you know this?
- How are they helped or encouraged to take up this help?

- How do you know this?

- What about after the exclusion term ends, what help might someone need then?
  - Who should tell you where to find this help?
  - Who should provide this help?
  - Can you think of anything that might get in the way of someone taking-up help of this kind, if it were offered?
    - How do you think people could get around this barrier?

Wrap up (5 mins)

Thank you very much for your time today – we are almost done!

Do you have anything else that you you'd like to say about anything we've discussed today?

We wanted to thank you for taking part, and remind you that what you told us today will remain confidential and anonymous. You will receive an email with your Amazon voucher within the next week.

If there's anything else you think of, or if you have any reflections after today's group ends, please feel free to email me at [xxxxx].

Lastly, if you'd like to learn more about anything we discussed, you can find free, confidential support and advice about gambling by visiting the GamCare website at www.gamcare.org.uk or calling their freephone number 0808 802 0133. An advisor would be happy to help you. This includes help to self-exclude if you feel this would be useful to you.

Thank you for your time.

Discussion guide for scheme user interviews

Introduction (3 mins)

My name is [xxxxx] and I'll be talking with you today on behalf of Ipsos MORI, the independent research company.

- The interview will last up to forty-five minutes
- It's more a discussion than a 'survey' with 'yes' or 'no' answers.
- There are no right or wrong answers, we just want to know about your experiences, and hear what you think.
- You can choose to not answer a question or end the interview completely at any point.
- Everything you say is completely confidential and information collected is anonymised.
- We will write a report at the end of this research project. We might use quotes, but we won't name you or give any information that might identify you personally.

Are you happy to proceed with the interview? Yes / No

IF NECESSARY: If you would like to read the Privacy Notice I can email it to you. I will ask you again at the end of the interview.

We will be talking about feeling in control of gambling, and what happens when people no-longer feel in control. If you would like to talk more about any of the things we raise in this interview, you can find free, confidential support and advice about gambling by visiting the GamCare website at www.gamcare.org.uk or calling their freephone number 0808 802 0133. I'll repeat these details at the end of the interview and email them to you after we finish.

I would like to record the interview, this is just to help me with my notes. I won't pass the recording on to anyone else. Are you happy for me to record? Yes / No

Do you have any questions before we start?

Gambling journey – pre-self-exclusion (5 minutes)

1. Through these interviews, we're going to try to 'map out' each person's 'gambling journey'. You can think of it as a timeline, from your first experiences of gambling through to today. Together we'll work out the different steps on the journey, then I'll ask you to tell me a bit more about some of them. Does that sound ok?

Yes / no

2. **I'd like you to think back to your first experiences of gambling. Do you remember other people around you gambling before you started gambling yourself?** [RECORD ON TIMELINE]

3. **Can you remember your first experiences of gambling?** [RECORD ON TIMELINE]
   - What sort of gambling?

4. **When did you first start to think you might have gambling-related problems?** [RECORD ON TIMELINE]
   - What made you think that?
   - What sort of problems were they?

5. **When did you first try to do something about gambling-related problems?** [RECORD ON TIMELINE, BE PREPARED TO REPLAY THESE ANSWERS AT Q10]
   - What did you do? ALLOW SPONTAENOUS RECALL, BUT PROBE IF NECESSARY ON:
     - Cooling off periods / timeouts
     - Bank account blocks
     - Deleting accounts
     - Maximum spend limits
     - GAMBLOCK
     - Professional Treatment
     - Talking to GAMCARE

- Support or advice from others
- Single operator self-exclusion schemes
- Any other harm minimisation tools or actions?

What made you decide to do something?

How did you find out where to go for help?

Experiences of self-exclusion (10 minutes)

6. [IF NOT ALREADY COVERED IN 5] **When did you first hear about multi-operator self-exclusion as an option?**

[RECORD ON TIMELINE – NOTE THIS MIGHT COME BEFORE THEY DEVELOPED GAMBLING-RELATED PROBLEMS]

How and where did you hear about it? [INTERVIEWER TO PROBE FOR MULTIPLE EXPOSURES, NOT JUST ONE]

What made you think self-exclusion might be useful to you?

7. **When did you self-exclude through** [NAME OF MULTI-OPERATOR SCHEME FROM SAMPLE]**?** [RECORD ON TIMELINE]

Is this your first self-exclusion?

Is this your only self-exclusion [PROBE ON SINGLE AND MULTI-OPERATOR SCHEMES. RECORD ALL ON GRID]?

[IF NOT] How many have you done and through what schemes?

Name of scheme	Approximate date of self-exclusion	Ongoing?

QUESTIONS WHICH FOLLOW SHOULD FOCUS ON THE SCHEME FROM WHICH THE INTERVIEWEE WAS SAMPLED, UNLESS THEY ARE ALSO CURRENTLY PARTICIPATING IN ANOTHER SCHEME FOR WHICH WE DO NOT HAVE SAMPLE.

8. **Could you talk me through the process you went through to self-exclude through** [SCHEME NAME] [IF NECESSARY: **this time around**]? AT EACH STAGE PROBE ON: How easy or difficult was it? Anything you found helpful or unhelpful at this stage? Anything that encouraged you or made you pause / put you off? How were the personnel involved?

- Getting contact details
- Making first contact
- Providing information, in writing, verbally or face-to-face
- What choices you had to make
    - Length of exclusion
    - Locality or locations for exclusion
    - Anything else?
- Were you pointed to any other support or other organisations who could help you with your gambling-related problems?
    - Help to control gambling behaviour
    - Help to deal with problems resulting from gambling
- Notification about the self-exclusion coming into effect

- Any further contact

During the self-exclusion (5 minutes)

In this section of the interview, I'm going to ask you about how effective the self-exclusion has been for you. This is so we can understand the effectiveness of the scheme. To remind you, this interview is completely anonymous and we will not pass any information that identifies you back to the scheme or to anyone else. Please be as honest as possible

9. To what extent has the [SCHEME NAME] self-exclusion scheme helped you to manage your gambling in [RELEVANT SECTOR / LOCATION(S)]?
    - In what ways has it been helpful?
    - In what ways has it not been helpful?
    - Have you reduced the amount of time you spend on gambling in [RELEVANT SECTOR / LOCATION(S)]?
    - Have you reduced the amount of money you spend on gambling in [RELEVANT SECTOR / LOCATION(S)]?
    - What could be changed about the scheme to make it more effective in reducing the amount of time / money you spend gambling in [RELEVANT SECTOR / LOCATION(S)]??
10. [IF APPLICABLE: We talked earlier about other things you have tried to do about gambling-related problems [RECAP ANSWERS TO Q5]. Has the scheme worked with other things you have tried to do about gambling-related problems? If so, how? [REPLAY ANSWERS FROM Q5 HERE]
    - What about specific harm-minimization tools?
    - What about other single operator self-exclusion schemes?
    - What about other multi-operator self-exclusion schemes?
11. Since you self-excluded through [SCHEME NAME], have you tried to gamble in any of the places you self-excluded from? [RECORD ON TIMELINE]
    - What happened? [PROBE IF MULTIPLE TIMES / LOCATIONS]
    - [IF STAFF WERE INVOLVED] How well do you think it was handled? What was good, what was less good?
    - [IF STAFF WERE INVOLVED] Did anyone point you to further help at this point?
    - Why do you think

- How did/do you feel about it afterwards?
- [IF THEY HAVE NOT TRIED TO BREACH] What do you think has kept you from trying to gamble in these places?

12. **Thinking about places you have not self-excluded from, have you gambled in any other way during your self-exclusion period?** [RECORD ON TIMELINE] EXPLORE HOW OFTEN, AND PROBE ON:
    - Gambling in other sectors
    - Outside of the designated radius
    - Online if have land-based self-exclusion
    - Land based gambling if signed up to GAMSTOP
13. **How do you feel about this gambling?**
    - Is it problematic, or is it different to what is covered by your self-exclusion?
    - How?
14. **Have there been any other changes to your life have happened (in whole or in part) because of your self-exclusion?** BE AWARE THAT THERE MAY BE POSITIVE AND NEGATIVE CONSEQUENCES FROM SELF-EXCLUSION, AND THAT GAMBLING MAY HAVE BEEN REPLACED BY OTHER HARMFUL BEHAVIOURS. PROBE ON:
    - Things you do instead of gambling that you enjoy or feel are positive?
    - Things that you do instead of gambling that you don't enjoy or that you feel are negative or harmful?

After the self-exclusion ends (5 minutes)

15. **You told me that your self-exclusion is due to end in [month]. Have you thought about what you will do when it ends?** [BE CAREFUL NOT TO MENTION GOING BACK TO GAMBLING. FOCUS ON WHETHER THEY WILL RENEW THE SELF-EXCLUSION OR BE ABLE TO STAY AWAY WITH DIFFERENT SUPPORT / NO SUPPORT] [IF NECESSARY, DESCRIBE SCHEME SPECIFIC OPTIONS AFTER THE SELF-EXCLUSION TERM ENDS]. [RECORD ON TIMELINE]
    - How do you feel about the length of your self-exclusion? Too long/not long enough?
    - What, if anything, do you think will be different as a result of the self-exclusion?

- What, if anything, will be different as a result of other factors (other help, friends and family, change of circumstances)?

16. [ONLY IF PARTICIPANTS SPONTANEOUSLY MENTIONS THEY WILL GO BACK TO GAMBLING] **Why do you think you will go back to gambling / gambling in these venues / online?**
    - [IF YOU PLAN TO CONTINUE GAMBLING] How, if at all, will your gambling be different?
    - Do you feel ready to go back to gambling on [SECTOR]
    - What other support, if any, do you think you might need to stay in control of your gambling?
    - To what extent do you think you have now tackled your gambling-related problems?
        - How much of this is down to the [SCHEME] self-exclusion?
        - How much is down to other factors?
17. **What, if anything, do you think [scheme name] could have done differently, that would have improved your experience or helped you (more)?**
    - What makes you say that?
    - [IF NECESSARY] If you could change one thing about the scheme, what would it be?

Looking ahead and final thoughts (2 minutes)

We are coming to the end of the interview. Is there anything else you would like to mention that we haven't already talked about?

If there's anything else you think of, or if you have any reflections after today's group ends, please feel free to email me at [email address], or call me on [telephone number].

Ipsos or another evaluation partner appointed by Gamble Aware may wish to carry out some follow-up research relating to this study within the next two years. Would it be ok to contact you again?

Yes / No

Thank you for taking the time to participate in this study. Before we finish I need to inform you that you can access the privacy notice online at <www.xxx> This explains the purposes for processing your personal data as well as your rights under data protection regulations to access your personal data, withdraw consent, object to processing of your personal data and other required information. OFFER TO SEND PRIVACY NOTICE BY EMAIL IF REQUESTED

If you'd like to learn more about anything we discussed, you can find free, confidential support and advice about gambling by visiting the GamCare website at www.gamcare.org.uk or calling their freephone number 0808 802 0133. An advisor would be happy to help you. This includes help to self-exclude from further sectors if you feel this would be useful to you.

Lastly, we wanted to thank you for taking part, and remind you that what you told us today will remain confidential and anonymous. You will receive an email with your Amazon voucher within the next week.

[THANK AND CLOSE]

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About Ipsos MORI's Social Research Institute

The Social Research Institute works closely with national governments, local public services and the not-for-profit sector. Its c.200 research staff focus on public service and policy issues. Each has expertise in a particular part of the public sector, ensuring we have a detailed understanding of specific sectors and policy challenges. This, combined with our methods and communications expertise, helps ensure that our research makes a difference for decision makers and communities.

Multi-Operator Self-Exclusion Schemes follow-up study

Reporting on 30 interviews with self-excluders

November 2022

This work was carried out in accordance with the requirements of the international quality standard for market research, ISO 20252 and with the Ipsos Terms and Conditions.

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Introduction

- In July 2020 Ipsos published a baseline and short-term impact evaluation report, on behalf of GambleAware, exploring how far Multiple-Operator Self-Exclusion Schemes have led to the desired changes in levels of awareness of the schemes and to explore perceptions, delivery arrangements and overall effectiveness of the schemes.
- In the baseline evaluation, Ipsos interviewed 42 users of Multiple-Operator Self-Exclusion Schemes between August and September 2019 to gain insight to their perceptions about self-exclusion within their first few months of using the scheme(s). As part of that process consent was gained to recontact these individuals to better understand the longer term impacts of the schemes.
- This report presents findings from this follow-up research, which has been commissioned on behalf of GamCare. Ipsos conducted 30 interviews in April/May 2022 with scheme-users last contacted during the baseline to serve as longitudinal insight into their opinions and perceptions about self-exclusion and their gambling behaviours since self-excluding including whether the Covid pandemic had any impact on their behaviour.
- This report encapsulates these findings from these interviews in addition to providing recommendations for the schemes.

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Summary

- **Most participants confirmed that they were still part of one or more self-exclusion schemes or still believed they were self-excluding at the time of the interview.** Some, however, had returned to gambling with most of these individuals feeling they now had more control over their gambling behaviour.
- **Participants were mostly positive about how effective self-exclusion was in terms of reducing their problem gambling behaviour, although its limitations were recognised**. Some were able to continue gambling by either breaching or gambling at venues they were not self-excluding from.
- Despite this, self-exclusion was seen as a 'speedbump' for gambling where the participant would be required to make a concerted effort in order to gamble. **For some participants, however, self-exclusion had very little effect as they were too easily able to circumvent scheme restrictions** therefore continuing to gamble problematically.
- Breaches are still an issue as seen in the baseline evaluation. Many participants knew how to avoid being detected at venues they were self excluded from whether they chose to breach or not (this applied to both land-based and online self-exclusion). However, **inadequate staff operation in arcades and betting shops should be a specific focus** as participant perceptions indicated some staff were either non-compliant or not sufficiently trained to implement the schemes.
- **There was little evidence to suggest that those self-excluding, transferred their harmful gambling behaviour into another sector or form of gambling**. Most participants, however, self-excluded from more than one sector at a time. In many cases they self-excluded from the sectors that had their game of choice, for example slot machines can be available at most land-based sectors in addition to online. GamStop was most likely to be used in conjunction with other self-exclusion schemes. It is also the case for these participants that COVID restrictions largely stopped play, rather than changed gambling behaviour to online.

- **Those that re-enrolled onto their self-exclusion scheme found the process to be easier than the initial enrolment process.** The ability to re-enrol by telephone or online was seen as a positive aspect where some feared going to a land-based venue would tempt them to return to gambling.
- **Some participants mentioned using other harm-minimisation tools in addition to self-exclusion, with counselling being the most mentioned tool.** Other harm-minimisation tools included mobile/PC software to block gambling sites and advertisements, asking their bank to block any gambling related transactions from their bank account, or relying on friends/family to control or manage their finances directly.
- **Few participants mentioned that they received marketing materials from operators in sectors from which they were self-excluding**. However, some did mention that they received marketing material immediately after their self-exclusion period ended which they were not comfortable with receiving so soon.
- **Nearly all participants were dissatisfied with the amount of gambling related advertising on TV, radio, and particularly online.** Online advertising on social media made participants particularly uncomfortable where, according to their perceptions, it was tailored and targeted towards them specifically.
- **Attitudes towards a single industry and/or national variation of self-exclusion was welcomed as an idea but had mixed opinion on whether it would work or be beneficial for them directly.** Some mentioned that their problematic gambling behaviour was isolated to one game or sector therefore there was no need to self-exclude from those in which they felt they had control, while others said they would prefer to be completely self-excluded from all forms of gambling. Participants, however, recognised the complexities in implementing such a scheme. Despite this, participants were **favourable towards the option of allowing a lifetime self-exclusion period** for whichever particular scheme they were registered on.

Methodology

- Ipsos recontacted a total of 42 self-exclusion scheme users who were interviewed in the baseline evaluation (August-September 2019). In total, 33 individuals expressed an interest to be re-interviewed for this research and 30 interviews were carried out.
- Interviews were conducted by the Ipsos research team via telephone with the participants between 11 April – 6 May 2022. Each interview lasted between 20-45 minutes depending on the scheme and depending on each users unique journey in relation to gambling and self-exclusion usage.
- The profile of users, including their age, gender and scheme use are in the tables below. Please note, Table 2 is based on the scheme in which the original user sample was drawn. As noted in this and the baseline report, many scheme users were part of more than one scheme at a time.

Table 1: Number of interviews by age and gender

Age	Female	Male	Total
18-24	0	2	2
25-34	1	11	12
35-54	5	9	14
55+	1	1	2
Total	**7**	**23**	**30**

Table 2: Number of interviews by scheme sample

Scheme	No. of interviews
Arcade	6
Betting	5
Casino	9
Online	6
Bingo - HS	3
Bingo - Traditional	1
Total	**30**

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Refraining from Gambling and gambling related harms

Most participants were currently self-excluding while some were unsure about their status

- On the whole most participants either confirmed that they were still part of one or more self-exclusion schemes or still believed they were self-excluding at the time of the interview. Several participants mentioned that they were unsure if their self-exclusion scheme time had expired while some were reluctant to check. This was largely because they didn't want to confront a decision on whether to re-enrol or being presented with the opportunity to return to gambling.
- Many participants found it difficult to recall the length of their self-exclusion period (with the exception of those using GamStop who were more likely to confirm it was five years). A few participants agreed more clarity as to when their scheme would expire would be beneficial. Some said direct access to their registration information, for example online, could be a solution.
- There was no evidence that longer self-exclusion periods prevented participants from re-enrolling in their self-exclusion scheme. Moreover, several participants believed having an option of a longer self-exclusion period would be beneficial so that they wouldn't be confronted with having to make a decision on whether or not to re-enrol.

> ***They brought up your file and then it was just like, 'Yes, I just want to add this, I just want to do it for another year,' so I think I was on the phone for five or ten minutes and then that was it. So really, really, really good, yes. Male, 38, Betting Shops, Bingo, Arcades***

> ***[Speaking about GamStop] The option of a lifetime ban on gambling as opposed to just a five-year maximum ban, yes. Male, 46, Online***

> ***For me, I just want to stop for life. I don't want to say, 'Oh, actually I have been twelve months.' I'm going to feel exactly the same way, because why wouldn't you, you know? It's like saying to a [drug] addict, 'Hello. Do you want to stop for six months or one year?' They're going to say, 'For life.' They're not going to say, 'I'll reassess it in a year's time and see if I still don't like it', you know? Female, 39, Bingo***

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Though participants were mostly positive about self-exclusion it was less effective for some

- Overall, participants were mostly positive about self-exclusion. Similar to findings found during the baseline evaluation, self-exclusion largely acts as a “speed bump” to problem gambling. While the schemes do not make it impossible to gamble, most participants found it more challenging to do so. To gamble, they would need to either conceal their identity, travel a further distance to access venues outside of their self-exclusion zone, or, if using GamStop, access overseas websites that were often seen as “risky”.

The self-exclusion helped as well… I knew I can't go to those places because if I'm going to get caught, they will just simply ask me to leave. You know, that's in your mind that, 'I've been self-excluded in those places, they probably know me’. Female, 32, Betting Shops, Arcades, Online

- Self-exclusion did not necessarily work in isolation as other life events were also seen to have a strong impact on gambling behaviour. For example, one participant mentioned that he changed jobs while self-excluding and was no longer near a high street therefore less likely to be presented with the opportunity to gamble. Support from friends and family as well as financial circumstances were also large contributing factors to one’s self-exclusion success.

If you look at my life now compared to what it was five, ten years ago, or probably even less than that, probably a few years ago. As I said, yes, I've got a three year old little boy. As I said, girlfriend stuck by me through the whole lot. Got a house, got a good job. Yes. It's changed my life completely. Male, 38, Online, Betting Shops, Bingo, Arcades,

- For some individuals, however, self-exclusion had little effect, if any, on their problem gambling behaviour as they were too easily able to breach venues they were self-excluded from. This was largely an issue seen by those who were self-excluding from arcades, with those in motor service stations being the easiest to breach, as well as some self-excluding from betting shops.

You’re relying on people working in particular arcades to actually do their job and look to see if you've excluded or not which it doesn't always work, you know. Female, 46, Arcades, Online, Betting Shops

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Casinos seen as most effective in stopping breaches while there is still more work to be done in arcades and betting shops

- The membership casino sector was seen as the most effective land-based venue in its ability to prevent breaching. Betting shops and arcades were found easier to circumvent, similar to findings from the baseline evaluation. This was largely based on staff being inadequately trained/prepared to recognise individuals who were self-excluded or staff simply never checking on customers to see if anyone in the venue was self-excluding.

> ***You didn't want just the hassle of being stopped entering a place. Not that the relative embarrassment in itself was really an issue, it was just the inconvenience. It's definitely an impediment. Male, 50, Casinos***

- While all participants who gambled while self-excluding had some degree of remorse, those who breached at a venue they were self-excluded from tended to display a higher sense of guilt or shame than those who gambled at venues they were not self-excluding from. Participants who breached their self-exclusion, uniformly felt they (the individual) were most responsible for their actions, however, there was also a sense that the venue, in addition to the scheme itself, could be better at stopping those who are self-excluded from entering the premises.

> ***I've put four figures into a fixed odds betting terminal inside of a bookies and I've never had somebody just come and say, 'Look mate, that's enough.' Never, not once. And that's from an establishment which I've been banned from as well. Male, 33, Betting Shops, Online***

- Several participants questioned why there wasn't better technology, such as facial recognition, or the ability to self-exclude nationally, for example, from all betting shops or arcades. Some participants, however, understood the complexities of implementing such approaches but nonetheless believed the schemes should be working towards these goals.

> ***I think the whole country, they should be banned from, every shop should be notified of all gamblers that want to ban themselves from every shop. But, I know that'd be more or less impossible to roll out and the same with online gambling. Male, 45, Betting Shops***

Few participants transferred their problematic gambling behaviour to an alternative form of gambling

- There is little evidence to suggest that those who are self-excluding from one form of gambling will switch to another form from which they are not excluded. In most cases, gambling mode replacement was from land-based gambling to online gambling, particularly during the pandemic, which is why GAMSTOP is often used in conjunction with other schemes.
- Participants who self-excluded from land-based and online tended to play the same game in both modes. For example, someone who self-excluded from arcades whose game preference was slot machines would also play slot machines online. Few participants moved to a completely different game from the one they recognised as their "problem game".
- A number of participants mentioned they have always gambled in more than one sector, but found their problem gambling to only relate to one particular sector or game. Several of these participants would self-exclude from the sector they found problematic yet continue to gamble in the ones they didn't find to be an issue. Some of these individuals mentioned a feeling of control over their gambling behaviour. Often, the lottery or scratch cards were seen as a safe or controllable form of gambling.

Because all of them [the arcades] really closed down [due to Covid] and that, so then that was, the only thing you could do was scratch cards or that. So I think it was because of that, because it was so easy, you can access it so easy on your phone, I think [referring to online gambling]. And I think it's so easy just to put your bank details and you're £100 down in a minute. Female, 44, Arcades, Betting Shops, Bingo, Online

I think I might have carried on and maybe got an extra few scratch cards on pay day but that's just not really an issue, what's a fiver on scratch cards every other week. Male, 34, Online

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Re-enrolling online or over the phone made it easier to refrain from gambling

- There were mixed reasons why participants decided to re-enrol after their self-exclusion period ended. Many participants felt as though the self-exclusion had been a main factor in preventing them from gambling and therefore didn't want the option to return. Others described how their friends and family had encouraged them to re-enrol as they had noticed the positive impacts of the schemes.
- For those that decided to re-enrol, there were various ways in which the process was made easier. Several participants benefited from the option of being able to re-enrol online or over the phone as they didn't have to enter the gambling venue which would have been a temptation to gamble again.
- Support from staff at land-based venues was mixed. In some cases they were extremely supportive doing whatever they could to make the customer feel comfortable. In contrast, other participants found the re-enrolling process challenging as staff in specific gambling venues actively encouraged them to return to gambling. For example, one participant spoke of re-enrolling their self-exclusion in an arcade where a member of staff attempted to persuade them to instead return to gambling.

I was starting to gamble more frequently again. It's like a comfort blanket for me, I can just ring them up and extend it when it's going to run out. Male, 38, Betting Shops, Bingo, Arcades, Online

I just want to stop for life, I'm not going to feel any different after 12 months. Female, 39, Bingo

It was very helpful because within one call they were able to exclude me from several places. Because when you go those places you still get that urge; you see those machines and it triggers you. Female, 32, Casino, Betting Shops

They always say to you 'Are you sure you don't want to come back?' and they said 'Why don't you exclude after your birthday?' because you get a free £5, you see. Female, 65, Arcades

Some participants felt as though they could now gamble without the harmful consequences

- Although many of the participants had decided to continue self-excluding after their term expired, others felt it was no longer needed and could gamble without harmful consequences.
- Among those who had decided to return to gambling, the sense of feeling in control was mentioned as the contributing factor. For these participants, self-exclusion had helped for a short time while they were vulnerable and gambling was having a negative impact on their lives. Several described how they now had more control due to lifestyle changes. For example they could resist frequent gambling due to work and family responsibilities.
- Some also described how they had only returned to certain forms of gambling, which they deemed as less harmful. For example, some participants mentioned how they would still bet on horseracing as they viewed this as 'just a bit of fun'.
- Another reason why a number of the participants had returned to gambling was because of the social aspects. An example of this was visiting casinos for friends birthdays or other special occasions. For these individuals, this type of gambling was not associated with their previous problems and so they didn't want to give these social activities up.

> ***I'm not hugely concerned about dangerous gambling. I'm in a much better place and I think I probably would go back to gambling on an ad hoc basis – I love playing blackjack. Male, 50, Casinos***

> ***I still have a go on the horses and I'm fine with that. It's just [operator name] that have got different machines - they're the issue. Male, 29, Betting Shops, Online***

> ***I'll go with friends for birthdays or stuff like that but it's recreational. I also have a controlled budget of what I will take with me and I won't exceed that. Male, 28, Casinos***

Value in excluding from multi-operator self-exclusion schemes

Most found value in self-excluding from more than one scheme with GamStop being the most used with land-based schemes

- As mentioned in the previous section, most participants were self-excluded from more than one scheme with online self-exclusion most often being used in conjunction with a land-based self-exclusion scheme. Several were appreciative that GamStop was available, citing how online gambling was easier to lose money compared to land-based gambling as there was less need for physical money.

> *It's probably the best thing I did and what I needed at the time – it won't let me do anything - I can't even do the lottery online. Male, 38, Online, Betting Shops, Arcades, Bingo*

- Other individuals found it beneficial to self-exclude from multiple sectors at a time because the game they deemed as harmful was available in different sectors. For example, slot machines can be available in arcades and betting shops, therefore they would self-exclude from all places slot machines were available. For some, self-excluding from multiple sectors may have prevented them from moving to a different form of gambling.

> *[When discussing registering to both land based and online schemes] ... it's almost as if GAMSTOP should be linked to bookmakers and land casinos! Male, 46, Casinos, Online*

- A number of participants highlighted the potential confusion around how long each scheme lasts and potentially would lose track on which schemes expired on which dates. This was also the case when it came to the radius of the self-exclusion zones between arcades and betting shops. Others mentioned they weren't aware if the scheme was a sector-wide or complete ban from all gambling establishments.

> *I wasn't actually aware where I was allowed into, you know, because there are quite a few, like, betting shops and whatnot in that area. Male, 24, Online, Arcades*

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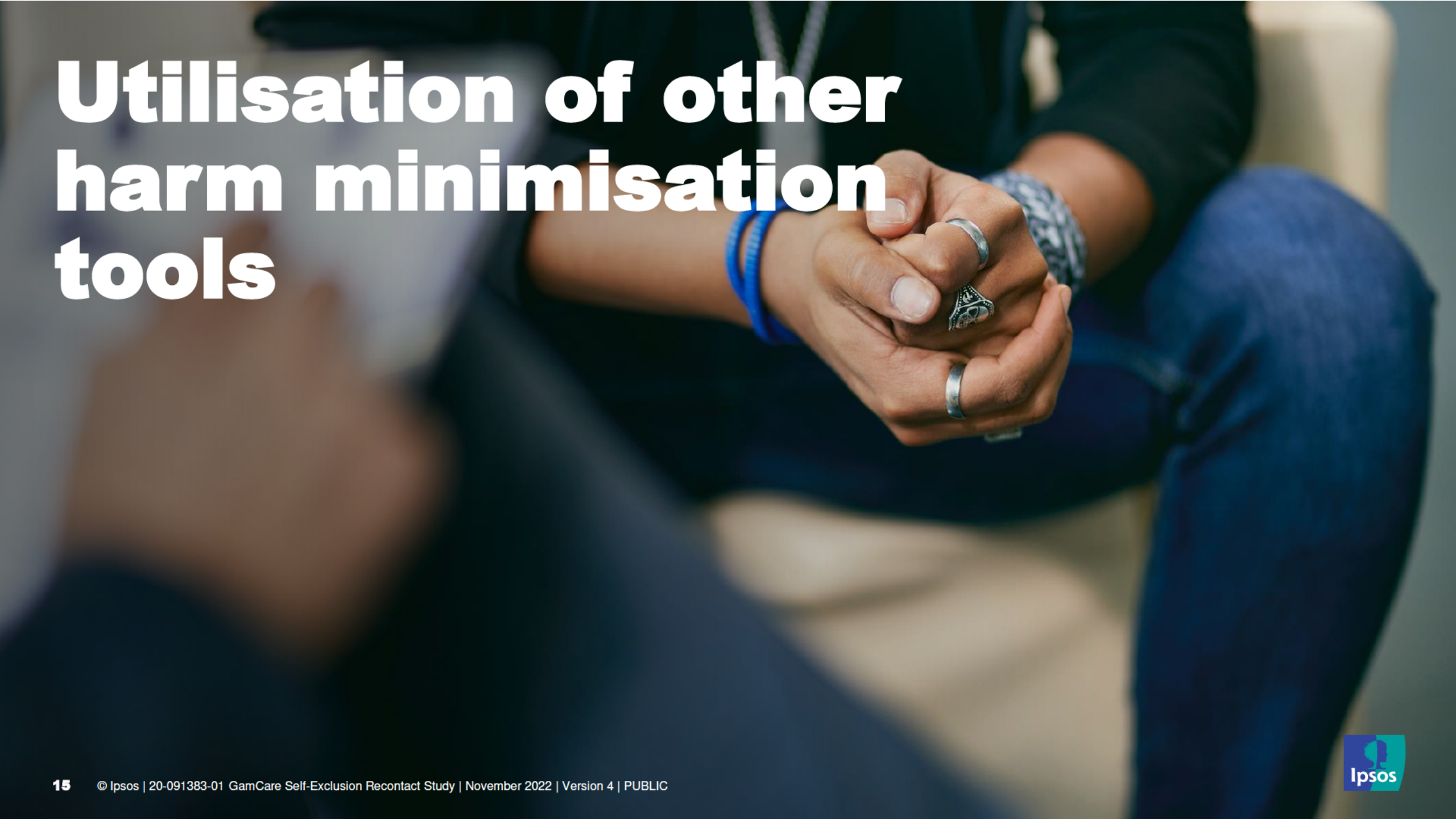
Utilisation of other harm minimisation tools



Some used additional harm-minimisation tools to self-exclusion with counselling being among the most mentioned

- Some participants mentioned using other harm-minimisation tools in addition to self-exclusion. Some used these tools alongside self-exclusion or prior to self-exclusion.
- Counselling and Gamblers Anonymous were among the most common type of harm-minimisation tools used. Counselling sessions and Gamblers Anonymous meetings offered an opportunity to discuss and share experiences (either in one-to-one or group sessions). Some mentioned that their counselling service involved registering to a self-exclusion scheme. The benefits of counselling was mixed having worked for some but not for others. Accessibility was mentioned as a significant barrier to using counselling where individuals worked during the day while holding parent/carer responsibilities in the evenings.
- Software to block online gambling was used by some participants. The most mentioned benefit to this software, when using it in conjunction with GamStop, was the ability to block gambling related ads.

[Speaking about counselling] I think the self exclusion scheme definitely initially played a massive part in it and then afterwards, being able to work on myself has made a massive impact so I think it's multifactorial, where it's a combination of the two. Male, 40, Arcades, Betting Shops, Online

I went under cognitive behavioural therapy and that helped as well. The first step is to admit but then you need to help yourself. Female, 32, Betting Shops, Arcades, Online

I did a 12 week counselling course and part of that involved helping people register with GamStop. It was great, nothing else had worked in the past. Male, 28, Casinos, Online

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Reliance on family members to manage personal finances was also a form of tool used to reduce harmful gambling behaviour

- Some participants requested their bank to block transactions on gambling related establishments. One participant mentioned moving banks in order to gain access to this service.
- Giving financial control of money/bank accounts to partners, friends or family was also mentioned as a device to reduce harmful gambling behaviour. This ranged from simply transferring money to their partner/family member when they were paid or handing over full control of their bank accounts.
- Several participants said they had found it beneficial to keep busy with other hobbies or work-related activities as a form of distraction from gambling. For some this was a requirement due to lifestyle changes and life, for example, a number of participants had changed careers or had gained more responsibility at work so they didn't have time to gamble. Others consciously made efforts to fill their time with other activities such as going on walks or socialising with friends and family.

I left [bank name] because they couldn't provide that and moved bank to Lloyds and froze gambling via my card and online - so now I can't use the card to gamble. Male, 33, Online

If I had surplus then I would transfer that to my sister and she would phone and she'd say, 'Why do you need it?'. It's really important to have these little things - to put a little brake on it. Female, 38, Bingo

I started to do different things like going out with friends and having dinner out. I need that time and we have a laugh; I'm trying to find a substitute - a healthier substitute to it. Female, 32, Betting Shops. Arcades, Online

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Impact marketing materials may have on those self-excluding

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Most participants said they did not receive marketing materials from operators from which they were self-excluding

- Very few participants mentioned that they received gambling related marketing materials from operators that they were self-excluded from. Some, however, said that they received materials not long after their self-exclusion period ended which they felt was an attempt to encourage them back to gambling.
- Few participants said that they did receive marketing material while self-excluding, however, it was unclear if this material was in fact from an operator which they were self-excluding from.
- Participants were more concerned about advertising beyond the control of the self-exclusion scheme. This included public advertisements for gambling establishments on television, radio, and online.
- Advertisements during sporting events, such as football, were frequently mentioned as challenging for some participants to see or hear. The sounds of slot machines on the radio were also mentioned as a worrisome trigger for some.

Of course, it was annoying when they were sending-, once the exclusion finished they were, kind of, sending me emails. I was so angry at them thinking, 'You know my exclusion just expired and you're still sending me those emails and you're still tempting me and this and that. Female, 39, Bingo

We are both inundated with text messages that come in from so many numbers, you couldn't even imagine. Basically saying, 'Click here, we'll give you £200 and you can gamble on our website.' They'll actively say, 'We're not on GamStop and we won't block you' sort of thing. Male, 38, Online

Social media is terrible. I know for a fact that I've had this conversation, my phone's probably listening to this conversation and probably tomorrow, I'm going to get pop ups come up of, like, free spins for this and free spins for that. Play online slots and stuff like that. If there's any way of getting rid of that, that would help. It just brings your mind back to it. Male, 38, Betting Shops, Bingo, Arcades

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Online advertisement, particularly on social media, was viewed as problematic by participants

- Several participants mentioned their dissatisfaction with online advertising. These commonly took the form of advertisement banners on social media sites or in the form of a video advertisement when watching YouTube. Some asked if there was a way to block these advertisements through either the website or browser settings.
- Although many of the participants felt that they could ignore advertisements on the TV, radio or even online, they also expressed concern for people who may be more vulnerable than they are, including children or young adults that may not know the consequences of harmful gambling behaviour.
- Some participants expressed concerns about the style and tone of advertising from operators being presented as “gamified”. Some felt that this evoked childhood memories, or disguised a potentially harmful and addictive product as a harmless game.

> ***The only thing about the marketing is that I have YouTube and, on YouTube, it's like every single video. Like, I have to turn off the ads, pay to turn off the ads because every single - it's got it all over the marketing, it's just ridiculous, it drives you crazy. Female, 36, Bingo, Arcades, Online***

> ***They've started bringing out games for adults gambling, but the branding, the style is everything the same as the childhood game, and I really think they're starting to pick up children or younger people gambling based off the brands alone. Male, 21, Casinos, Betting Shops, Online***

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Interest in a cross sector multi-operator scheme

General support for cross sector scheme in principle although participants recognise it may be impractical

- Participants largely supported the idea of a cross-sector multi-operator self exclusion scheme in principle. Some participants felt that to truly recover from harmful gambling behaviour, they would need the tools to stop gambling completely and a cross-sector scheme would be able to provide this.
- Others however felt that their harmful gambling behaviour was limited to just one sector and therefore a cross-sector scheme would not be beneficial for them (although they recognised it could be useful for others).
- Participants cited the limitations of the current schemes, such as geographical boundaries and easiness of breaching, therefore any additional layer of protection which a cross-sector scheme may provide could be positive.
- Some participants, however, recognised the logistical limitations and practicalities of rolling out such a scheme.
- Nonetheless some participants mentioned there is scope for different schemes to collaborate further, for example, more established links between land-based schemes and GamStop.

> ***I think that should certainly be an option. I think different people may have different weaknesses. Maybe there should be a multiple choice kind of scenario. Male, 50, Casinos***

> ***I would gamble on anything, so whether it's roulette, whether it's in a bookie, online, sports, any sports for that matter. I would gamble it, so yes I would fully support and sign up to a complete ban on all areas. Male, 33, Online***

> ***There's three bookmakers in my town, I can pick that one, that one and that one...they add you to it, but in twelve months time, it automatically finishes. You have to ring up and re-do it all and it's almost like at the time you just want to-, you know, it's almost as if GAMSTOP should be linked to bookmakers and land casinos. Male, 46, Online, Casinos***

Improvements to self-exclusion schemes

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The following recommendations are based on participant perceptions and what they believe would improve their experience of self-exclusion. These interviews have demonstrated that each customer has a unique journey that takes them to self-exclusion. Therefore, the underlying theme across many of these recommendations is providing more flexibility to customers, allowing them to customise or design a scheme that works best for them. For various reasons, we understand that not all of these recommendations would be possible to implement, however they should be considered as long-term goals.

- Allow for more flexible time lengths so that customers can design a self-exclusion period that works best for them. Several participants desired their length of exclusion to be longer so that they did not have to confront the decision to return to gambling – in some cases participants asked for it to be a lifetime period. While this may not be useful for all participants, the availability of both longer and shorter periods of self-exclusion would be welcomed.
- Alternatively some participants mentioned they would prefer automatic re-enrolment when their self-exclusion period expires. Here, the customer would be notified their self-exclusion period would be coming to an end and would be given a set number of days to notify the scheme that they would like to return to gambling. If no contact is made, then they would automatically be re-enrolled. It was felt that this would give some participants peace-of-mind, however, it is also recognised that it could put some individuals off from signing up for self-exclusion or be an unhelpful reminder that they can return to gambling. An alternative could be an option to have automatic re-enrolment without an alert where the self-exclusion period would simply be automatically re-started for an additional 6 months at a time unless the customer intervenes and asks for the automatic re-enrolment option to be removed. It is recognised, however, that the indefinite retention of personal data would not be practical within GDPR guidelines, therefore, both options would need thorough assessment to determine if they would at all be viable.
- Additionally, easy customer access to their self-exclusion information would be seen as positive, particularly for those on land-based schemes. Although not all participants said they required it, some mentioned that they would like the ability to view their scheme information, such as expiry date, online.

- Scheme providers should continue efforts to innovate technology to prevent breaching, such as facial recognition technology. While the system in place for land-based venues is not perfect, these interviews found evidence that the harder it is to breach, the more effective self-exclusion is on both gambling behaviour and customers' mindset towards gambling. Additionally, more consultation work would be beneficial between MOSES, BISES, BACTA and Smart Exclusion on how to improve and maintain a standardised implementation of their schemes, including more efficiently checking for customers who were self-excluding, across operators and venues.
- A number of participants mentioned they felt uncomfortable receiving marketing material immediately after their self-exclusion period expired. According to existing requirements for operators (for example LCCP 3.5.2) no marketing materials should be sent to a customer until they have agreed to accept such marketing material when their self-exclusion period has come to an end. Scheme providers and the Gambling Commission should ensure all operators are following this procedure and remind them of this requirement if necessary.
- Free gambling related ad-block software should be considered for all those self-excluding. Many participants felt that they were bombarded by advertisements online and on social media which was difficult to avoid or control. By offering free ad-block software, customers would have more control over preventing unwanted gambling advertisements while online.
- While attitudes towards a cross-sector scheme was seen as positive, creating and implementing such a scheme was also seen to be a challenge. Nonetheless it was recognised that there should be more cross-sector cooperation and linkages between schemes. For example, the ability to register simultaneously onto multiple schemes should be available.
- Furthermore, there should be continued support for organisations such as GamCare to offer layered support in conjunction with self-exclusion. Evidence in these interviews have shown that this type of support is found to be beneficial, however, the take-up could be improved. More cooperation between the schemes and these organisations would be positive while new ways should also be sought to improve accessibility of tools such as counselling, for those with additional out-of-hours responsibilities an option to speak with a counsellor via a live chat function online was mentioned as one possible solution.

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This work was carried out in accordance with the requirements of the international quality standard for market research, ISO 20252.

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From: [redacted]
Cc: [redacted]
Subject: RE: Data request for Gaming Machine Technical Standards and Testing strategy consultation
Date: 16 December 2024 16:27:00
Attachments: image001.png

Hi [redacted]

Thanks for letting me know

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, December 16, 2024 4:05 PM
To: [redacted]gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Re: Data request for Gaming Machine Technical Standards and Testing strategy consultation

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Hi [redacted]

[redacted] could you please tender my apologies. I have arranged for both [redacted] and [redacted] to attend in my stead.

Regards

[redacted]

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Date: Monday, 16 December 2024 at 15:44

To: [redacted]@gamblingcommission.gov.uk>, [redacted]
[redacted]@bacta.org.uk>,[redacted]@bacta.org.uk>

Subject: Data request for Gaming Machine Technical Standards and Testing strategy consultation

Hi all

From the responses I received the morning slot is the most popular. Hopefully, all can make it.

Regards

[redacted]

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 354 265 186 041

Passcode: 2bL6hp2E

Dial in by phone

+44 20 3855 4234,,351534050# United Kingdom, City of London

Find a local number

Phone conference ID: 351 534 050#

For organizers: Meeting options | Reset dial-in PIN

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From: [redacted]
To:
Subject: SESOG - information reporting
Date: 16 December 2024 15:54:00
Attachments: image002.png

Hi [redacted]

Hope you're well.

Please would you send me the figures for Quarter 2 (July to September).

Kind regards

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

Making gambling safer, fairer and crime free

From: [redacted]
To:
Subject: RE: Gambling Commission
Date: 17 December 2024 14:12:00
Attachments: image002.png

Hi [redacted]

Not a problem, I'll send something over for early in the new year.

Many thanks

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, December 17, 2024 2:11 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission

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Hi [redacted]

Sorry I haven't got back to you sooner; it has been a busy few weeks.

Yes, this is something that we would be delighted to help you with.

Would you like to suggest sometimes for a team's meeting to discuss?

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 02 December 2024 12:39
To: [redacted]@bacta.org.uk>
Subject: Gambling Commission

Hi [redacted]

I've been given your contact details by my colleague [redacted] and I hope you don't mind me getting in touch.

I would like to arrange some training for my colleagues in licensing so they have a better

understanding of your organisation and the operators you represent. Is this some thing you would be interested in doing? If so please come back to me and perhaps we could arrange a Teams meeting to discuss further.

Kind regards

[redacted]

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[redacted]

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From: [redacted]
To:
Subject: RE: Gambling Commission - Your Teams meeting with [redacted]
Date: 19 December 2024 14:55:13
Attachments: image003.png
image004.png
image005.png
image008.png
image010.png

> You don't often get email from [redacted]bacta.org.uk. Learn why this is important

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Hi [redacted]

Thank you for your reply.

I can see in [redacted] diary that he has a meeting on that day from 11am to 12pm.

Can you please do earlier (at 9am, or at 10am?), or after (from around 12:30pm onwards)?

Waiting for your kind reply, and I wish you a happy Christmas and a joyful new year

Kind regards
[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 19 December 2024 13:46
To: [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission - Your Teams meeting with [redacted]

Hi [redacted]

Thank you for getting in touch. I have moved the appointment to Friday 17 January @ 11. I hope this time works, but if not, please let me know and I can reschedule.

Have a lovely Christmas and New Year

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, December 19, 2024 11:01 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission - Your Teams meeting with [redacted]

> You don't often get email from [redacted]bacta.org.uk. Learn why this is important

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

Dear [redacted]

Trust this email finds you well.

Nice to virtually meet you, my name is [redacted] and I am [redacted], hope you do not mind me writing.

[redacted] and I have just spoken about a Teams meeting you are going to have, possibly in the new year in January.

As we shall be attending an important event show (EAG event show at ExCel in London) from 14th to 16th January included, can I please suggest for the Teams meeting to be scheduled either on Monday 13th January in the morning, and/ or on Friday 17th January (any given time from 9am to 5pm)?

Waiting for your kind reply, I wish you a good day.

Kind regards

[redacted]
[redacted]

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From: [redacted]@bacta.org.uk
Sent: 17 December 2024 14:11
To: [redacted]@gamblingcommission.gov.uk
Cc: [redacted]@bacta.org.uk
Subject: RE: Gambling Commission

Hi [redacted]

Sorry I haven't got back to you sooner; it has been a busy few weeks.

Yes, this is something that we would be delighted to help you with.

Would you like to suggest sometimes for a team's meeting to discuss?

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 02 December 2024 12:39
To: [redacted]@bacta.org.uk>
Subject: Gambling Commission

Hi [redacted]

I've been given your contact details by my colleague [redacted] and I hope you don't mind me getting in touch.

I would like to arrange some training for my colleagues in licensing so they have a better understanding of your organisation and the operators you represent. Is this some thing you would be interested in doing? If so please come back to me and perhaps we could arrange a Teams meeting to discuss further.

Kind regards

From: [redacted]
To:
Subject: RE: Tablets and B3 count
Date: 19 December 2024 11:16:00
Attachments: image002.png

Hi [redacted]

As you say, there is an element of subjectivity to this. The expectation is that, hypothetically, if **every** tablet and gaming machine were used simultaneously, there should be enough room in the venue for each player to play comfortably without hinderance. A seat is not required. There is no min/max figures as it's obviously dependent on each venue size and layout. It's also important to bear in mind that all tablets must be available for use and able to be used without staff having to assist eg turn it on/connect etc.

Hope this helps

Kind regards
[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Thursday, December 19, 2024 11:02 AM
To: [redacted]gamblingcommission.gov.uk>
Subject: Tablets and B3 count

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Hi [redacted]
Hope you are well. I've had a query from an operator asking how much occupy-able space the GC requires for a player to be able to play on a tablet, if they can be standing or if they need a seat. I've suggested to them that it is subjective but players need to have enough room for them to play privately and comfortably. However I've been asked to clarify the minimum requirement so any guidance / thoughts would be very much appreciated.

From: [redacted]
Subject: RE: EAG Safer Gambling Hub - Branding
Date: 20 December 2024 14:03:00
Attachments: image001.png
image002.png

[redacted]

[redacted]

[redacted]

From: [redacted]gamblingcommission.gov.uk>
Sent: Friday, December 20, 2024 12:34 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: RE: EAG Safer Gambling Hub - Branding

Hi [redacted]

I've attached our logo and the banner designs – any issues or questions let me know!

Thanks,

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]
To: [redacted]
Subject: Re: Invitation to a free Gambling Commission compliance workshop - Arcade Sector
Date: 23 December 2024 08:34:34
Attachments: image001.png
image002.png

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[redacted]

And you have a good Christmas..

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Sunday, December 22, 2024 9:28:51 PM
To: [redacted]bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Invitation to a free Gambling Commission compliance workshop - Arcade Sector

Hi [redacted]

Apologies, we should have given you the heads up for this just before it went out, but these are only to gather numbers for the workshops as we have to arrange the facilities now well in advance.

We will be in touch regarding the finer points in the New Year and will seek to inform you beforehand of the actual arrangements/input etc.

Cheers and Happy Christmas.

[redacted]

[redacted]

[redacted]

[redacted]

GAMBLING COMMISSION

[redacted]

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[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Sunday, December 22, 2024 9:29 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Invitation to a free Gambling Commission compliance workshop - Arcade Sector

Hi [redacted]

Apologies, we should have given you the heads up for this just before it went out, but these are only to gather numbers for the workshops as we have to arrange the facilities now well in advance.

We will be in touch regarding the finer points in the New Year and will seek to inform you beforehand of the actual arrangements/input etc.

Cheers and Happy Christmas.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, December 20, 2024 5:06 PM
[redacted]@gamblingcommission.gov.uk>
Subject: FW: Invitation to a free Gambling Commission compliance workshop - Arcade Sector

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[redacted]

I have received this e mail from one of my members in Bolton. They are keen to attend one of the forthcoming workshops and have already booked.

Did you or [redacted] share the details of the forthcoming workshops with anyone from bacta as we are keen to keep abreast of communication to our members around raising standards. I note in the GC letter dated 26/11/24 from [redacted] that the GC will be working with BACTA and other operators directly to ensure messages from the letter are clearly received.

Cheers [redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 23 December 2024 08:43
To: [redacted]@bacta.org.uk <[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk [redacted]@bacta.org.uk>; [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: Arcade workshops in February

Dear [redacted] and [redacted]

I hope you are both well. Please accept my apologies that you didn't have sight of the recent communication relating to the Arcade workshops in February. It was my intention that you received a copy of this before it was released publicly and unfortunately this didn't happen.

I would like to reassure you that Bacta are very welcome to attend the workshops, and have an input. We would very much like to share the general contents of the workshop prior to the sessions and welcome any input from Bacta regarding some key questions that members may have for the Commission. It is our intention to cover key areas we identified from recent assessments with a focus on customer interaction requirements. We have not yet finalised the content of the workshops and were very much focussed on getting venues and dates confirmed at this point in time.

I will ask [redacted] to make contact with [redacted] early in the new year to arrange a catch up to talk through logistics of the events, Bacta input and confirm attendees from Bacta.

I hope you both have a lovely Christmas, best wishes for the new year and we will catch up in 2025.

Kind regards

[redacted]

From: [redacted]
To: [redacted]
Subject: Re: Working Group for Operator Engagement Forum (OEF)
Date: 07 January 2025 08:49:26
Attachments: image.png
image.png

Hi [redacted]

Sorry you won't be able to make this session! I'll include you on invites for future sessions and hopefully the next one works better for your diary.

Thanks for letting us know.

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: 06 January 2025 13:28
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Working Group for Operator Engagement Forum (OEF)

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My apologies. Our Board meeting is at this time.

Kind regards.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]gamblingcommission.gov.uk>

Sent: 06 January 2025 13:21
Subject: Working Group for Operator Engagement Forum (OEF)
When: 23 January 2025 11:00-12:00.
Where: Microsoft Teams Meeting

Hi all - Happy New Year!

The time has come to start planning our second Operator Engagement Forum, which will take place on 2nd April 2025.

As you know, this event exists to support two-way discussions between the Commission and Industry. Therefore, it's essential that Operators have a voice in the design and facilitation of the day.

To do this, we're pleased to invite you to join the working group for this event. In these sessions, we'll be looking for your contribution, feedback and support in developing:

- The agenda and content
- The Operator-led sessions
- The structure of the day

The agenda for this first session is attached.

If you are no longer interested in being a member of this working group, please let us know by responding to this email. Otherwise, we look forward to seeing you then.

Thanks

The Operator Engagement Forum Team

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Microsoft Teams Need help?

Join the meeting now

Meeting ID: 322 081 067 566

Passcode: wJ3x9wB7

For organizers: Meeting options

Sent: Wednesday, January 8, 2025 12:57 PM
To: [redacted]@bacta.org.uk>
Subject: RE: EAG Safer Gambling Hub - Branding

Hi [redacted]

Thank you for sharing this information. Attendees from the GC are:

Tuesday 14	Wednesday 15	Thursday 16
[redacted]	[redacted]	[redacted]

I will ask my colleagues within our Communications team to update with any other potential attendees at the event.

Many thanks and looking forward to meeting you next week.

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, January 8, 2025 10:48 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: EAG Safer Gambling Hub - Branding

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Hi [redacted]

Happy New Year!

Looking forward to meeting you at EAG next week!

- The show opens to visitors at 10:00am each morning.
- Please see the attached floor plan for the EAG Expo. The Gambling Commission Desk will be in the Safer gambling Hub, next to the Bacta Lounge in the centre of the venue.
- Promotional branding is being built into the set up for the Safer Gambling Hub, rather than pop ups. Do feel free to bring along any literature/ additional branding you wish to distribute.

In advance, I would appreciate it if you could pass on who else from the Gambling Commission will be in attendance at EAG?

Thank you and best wishes,

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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From: [redacted]@gamblingcommission.gov.uk>
Sent: 03 January 2025 2:04 PM
To: [redacted]@bacta.org.uk>
Subject: RE: EAG Safer Gambling Hub - Branding

Hi [redacted]

Happy New Year!!

We are looking forward to attending the event from 14th January. I would just like to check a few things ahead of the event please:

- Can you confirm the times the show will be open across the 3 days please (I note we can enter the event from 08:00 each morning).
- Can you provide a plan of the event to show where our stand will be positioned, please.
- Can you confirm if the promotional material – pop up banner will be located at the stand or will need to be collected from elsewhere at the show.

Many thanks

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Thursday, December 19, 2024 3:51 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: Re: EAG Safer Gambling Hub - Branding

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Hi [redacted]

Thank you very much for your email.

I believe that this spec is in relation to a pop up banner for the event. If you have a set design for that I am sure it would suffice.

Please do also register for exhibitors badges here: https://www.eagexpo.com/exhibitor-

registration

With an exhibitor badge, they can get into the halls before show open (from 8am each morning). Badge holders can also get in on the Monday before show open and can collect their badges from Midday that day.

Best wishes,

[redacted]

[redacted]

[redacted]

[redacted]

29-30 Ely Place

London EC1N 6TD

From: [redacted]@gamblingcommission.gov.uk>
Sent: 18 December 2024 4:30 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: RE: EAG Safer Gambling Hub - Branding

Hi [redacted]

Hope you are well – [redacted] just passed on your email below to the comms team.

We can send both a black and white high res version of our GC logo but could you confirm the ask re the 8 x artwork files 600mm x 1800mm + 5mm bleed?

Thanks,
[redacted]

From: [redacted]
Sent: Tuesday, December 17, 2024 4:03 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: FW: EAG Safer Gambling Hub - Branding
Importance: High

Hi [redacted]

I've CC'd in [redacted] who can help re the logo and signs – in terms of the free-standing signs, what kind of design are they after for these?

Thanks,
[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, December 13, 2024 4:28 PM
To: [redacted]@bacta.org.uk>
Subject: EAG Safer Gambling Hub - Branding
Importance: High

> You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Good afternoon,

Thank you very much for confirming your attendance at the Safer Gambling Hub at the EAG Expo 2025 between 14-16 January.

In terms of branding, the Expo marketing team are keen to get banners etc off to the printers so I would be very grateful if you could pass on logos etc for the SG Hub and I will pass them off to the team. If I could get these by Friday 20th December, I would be very grateful. They have asked for the following spec:

Free standing signs: 8 x artwork files 600mm x 1800mm + 5mm bleed

High resolution logo

Do let me know if you need any further details ahead of time

I will be in touch soon with venue housekeeping, do register your attendance here as an exhibitor: EAG Expo - Home

Best wishes,

[redacted]

[redacted]

[redacted]

[redacted]

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London EC1N 6TD

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: EAG Expo
Date: 09 January 2025 15:35:00

Sounds like a plan!

From: [redacted]@bacta.org.uk>
Sent: Thursday, January 9, 2025 3:34 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: EAG Expo

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

Hi [redacted]

Excellent news! Could we pencil in a meeting at 12 noon on Wednesday at the Bacta lounge.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 09 January 2025 15:31
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: EAG Expo

Hi [redacted] and [redacted]

I've registered to go down with [redacted] and [redacted] on Wednesday. Keen to have a look around and catch-up with different contacts.

I can make anytime between 11am and 4pm. What time works for you?

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, January 9, 2025 3:27 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: EAG Expo

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Hi [redacted]

Happy new year!

I was wondering if you were able to attend the EAG Expo next week in London EAG Expo - Home

If so, it would be good to get together for an informal catch-up.

Let me know.

Best wishes.

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

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From: [redacted]
To:
Subject: RE: Invitation to a free Gambling Commission compliance workshop - Arcade Sector
Date: 09 January 2025 10:07:41
Attachments: image001.png
image002.png

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[redacted]

Any chance you can ring me for 10 mins today please. Not to cover all the detail but just to see what your brief thoughts are. We are putting together an input for our operators next week...

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 22 December 2024 21:29
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Invitation to a free Gambling Commission compliance workshop - Arcade Sector

Hi [redacted]

Apologies, we should have given you the heads up for this just before it went out, but these are only to gather numbers for the workshops as we have to arrange the facilities now well in advance.

We will be in touch regarding the finer points in the New Year and will seek to inform you beforehand of the actual arrangements/input etc.

Cheers and Happy Christmas.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, December 20, 2024 5:06 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Invitation to a free Gambling Commission compliance workshop - Arcade Sector

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

[redacted]

I have received this e mail from one of my members in Bolton. They are keen to attend one of the forthcoming workshops and have already booked.

Did you or [redacted] share the details of the forthcoming workshops with anyone from bacta as we are keen to keep abreast of communication to our members around raising standards. I note in the GC letter dated 26/11/24 from [redacted] that the GC will be working with BACTA and other operators directly to ensure messages from the letter are clearly received.

Cheers [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 18 December 2024 15:47
Subject: Invitation to a free Gambling Commission compliance workshop - Arcade Sector

Dear Licensee

We recently wrote to you reminding you of your obligations around customer interaction and anti-money laundering. To support you to improve your understanding of the relevant Licence Conditions and Codes of Practice, we would like to invite you to a free workshop. Whilst attendance is not compulsory it will assist your understanding of the relevant topics.

We will be running four workshops on various dates and locations in February 2025. As spaces are limited spaces, and will be booked on a 'first come, first served basis' you are advised to book as soon as possible to avoid disappointment .

Please refer to the attached letter for details of where the workshops are being held and how to book.

Please also note, that whilst your response will be logged, due to the Christmas holidays it will be January 2025 before all spaces will be allocated. You will receive a further e-mail regarding this once the details have been finalised.

For those that are unable to make either the date or location of the workshops an online webinar will be broadcast in March 2025. Further details of this will be communicated in due course.

Kind Regards,

Compliance

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Compliance

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From: [redacted]
To:
Subject: Re: Workshops
Date: 10 January 2025 11:29:36

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Fine by me

[redacted]

[redacted]
[redacted]
[redacted]
[redacted]
[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, January 10, 2025 11:17:07 AM
[redacted]@bacta.org.uk>
Subject: RE: Workshops

Hi [redacted]

I will call your mobile at about 1.30PM. OK?

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, January 10, 2025 10:20 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Workshops

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

[redacted]
Can we do between 1.30 & 3.30pm time to suit you....

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, January 10, 2025 9:43:59 AM
To: [redacted]@bacta.org.uk>
Subject: Workshops

Hi [redacted]

Are you available later to discuss the above?

Thanks.

[redacted]

[redacted]
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COMMISSION
[redacted]@gamblingcommission.gov.uk
www.gamblingcommission.gov.uk
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From: [redacted]
To:
Subject: SESOG - information reporting
Date: 10 January 2025 08:56:00
Attachments: image002.png

Hi [redacted]

Hope you're well.

Please would you send me the figures for Quarter 2 (July to September 2024).

Kind regards

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[redacted]

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From: [redacted]
To: [redacted]
Subject: Small operator workshops
Date: 10 January 2025 13:39:00

Hi [redacted]

I hope you managed to speak to [redacted] yesterday. As promised dates and locations of the workshops:

Workshop 1
4 February 2025
John Abel Room
Grange Court
Pinsley Road
Leominster
Herefordshire
HR6 8NL

Workshop 2
6 February 2025
Crawley Town Hall
The Boulevard
Crawley
East Sussex
RH10 1UZ

Workshop 3
25 February 2025
Victoria Room
Loughborough Town Hall
Market Place
Loughborough
Leicestershire
LE11 3EB

Workshop 4
27 February 2025
Buchanan Room
Mercure Glasgow City Hotel
201 Ingram Street
Glasgow
G1 1DQ

Hi [redacted]

Please see below for your information attendees from the Gambling Commission for this week's event:

Tuesday 14	Wednesday 15	Thursday 16
[redacted]	[redacted]	[redacted]

Kind regards

[redacted]

From: [redacted]
To:
Subject: Re: Bacta/Gambling Commission Roundtable
Date: 15 January 2025 09:06:36
Attachments: image001.png
image002.png
image003.png

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

Thanks

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Wednesday, January 15, 2025 9:05:36 AM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Ah of course, apologies [redacted] hope it's going well.

Look forward to hearing from you later in the week.

Kind regards,
[redacted]

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[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, January 15, 2025 8:52 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: Bacta/Gambling Commission Roundtable

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

Hi [redacted]

I'm currently at Bacta's annual trade show which finishes cop tomorrow.

I'll get back to you later in the week, if that's ok.

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, January 14, 2025 11:32:33 AM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Hi [redacted]

Hope you are well. I just wanted to circle back here to see if you had any updates on who will be attending and any suggested agenda items.

Look forward to hearing from you.

Kind regards,
[redacted]

GAMBLING COMMISSION

[redacted]

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From: [redacted]
To:
Subject: Re: Gambling Commission Compliance Workshop - 4 February 2025 (FOR ACTION BY CLOSE OF BUSINESS FRI 24 JAN)
Date: 16 January 2025 13:29:06
Attachments: image002.png
image003.png

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi,
I can confirm that I will be attending [redacted].

Kindest regards

[redacted]

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Thursday, January 16, 2025 9:28:05 AM
Subject: Gambling Commission Compliance Workshop - 4 February 2025 (FOR ACTION BY CLOSE OF BUSINESS FRI 24 JAN)

Dear Licensee

Thank you for your booking to attend the Gambling Commission Compliance Workshop at Leominster on 4 February. We are pleased to confirm you have been allocated the places at this event that you requested. Please reply to this email by close of business on Friday 24 January to confirm your attendance, and whether you have any specific dietary requirements (e.g. gluten free, lactose free, or vegan). Vegetarian options will be provided.

The venue for the workshop is:

The John Abel Room
Grange Court
Pinsley Road
Leominster
Herefordshire
HR6 8NL

The venue is fully accessible. You can find directions and information on the closest car parks here: Grange Court - Find Us

The agenda for the day is as follows:

09:30 to 10:00 – Arrival and registration (tea, coffee and pastries/biscuits will be provided)
10:00 to 10:30 – Customer interaction presentation
10:30 to 11:15 – Group discussion

11:15 to 11:30 – Break (tea and coffee will be provided)
11:30 to 12:00 – Group feedback
12:00 to 13:00 – Lunch and networking (lunch will be provided)
13:00 to 14:00 – AML presentation
14:00 to 14:30 – Group discussion
14:30 to 14:45 – Break (tea and coffee will be provided)
14:45 to 15:00 – Group feedback
15:00 to 15:30 – Q & A and close

The Gambling Commission officers present on the day [redacted]

There are limited places remaining at the event, so we may be able to accommodate additional bookings if you have additional colleagues who wish to attend. If you wish to book additional places, please confirm the name, account number of the relevant Operating Licence, and the email address of the person attending. We will come back to you next week to confirm if your booking request for additional places has been successful.

Best wishes

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Your meeting with [redacted], today at 12:30pm
Date: 17 January 2025 11:12:00
Attachments: image003.png
image004.png
image005.png
image008.png

Hi [redacted]

Thank you for letting me know, and please don't apologise, I appreciate how busy everyone is.

Would 15:15 work for this afternoon?

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, January 17, 2025 9:44 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Your meeting with [redacted] today at 12:30pm
Importance: High

> You don't often get email from [redacted] bacta.org.uk. Learn why this is important

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Dear [redacted]

I hope this email finds you well.

Nice to meet you, my name is [redacted] I am [redacted].

I am writing about your meeting for later today at 12:30pm, with [redacted] which now requires modification. I am very sorry for the last-minute change, but can we please move your meeting with [redacted] to any given time (always today) after 2:30pm?

I hope that would not be a problem for you, do let me please know what works best for you, thank you very much.

Kind regards,

[redacted]
[redacted]

From: [redacted]
To: [redacted]
Subject: RE: Gambling Commission Compliance Workshop - 4 February 2025 (FOR ACTION BY CLOSE OF BUSINESS FRI 24 JAN)
Date: 19 January 2025 10:46:05
Attachments: image001.png
image002.png

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[redacted]

I will be attending the workshop in Leominster on 4/2. [redacted]

Thankyou

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 16 January 2025 09:28
Subject: Gambling Commission Compliance Workshop - 4 February 2025 (FOR ACTION BY CLOSE OF BUSINESS FRI 24 JAN)
Importance: High

Dear Licensee

Thank you for your booking to attend the Gambling Commission Compliance Workshop at Leominster on 4 February. We are pleased to confirm you have been allocated the places at this event that you requested. Please reply to this email by close of business on Friday 24 January to confirm your attendance, and whether you have any specific dietary requirements (e.g. gluten free, lactose free, or vegan). Vegetarian options will be provided.

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Leominster
Herefordshire
HR6 8NL

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13:00 to 14:00 – AML presentation
14:00 to 14:30 – Group discussion
14:30 to 14:45 – Break (tea and coffee will be provided)
14:45 to 15:00 – Group feedback
15:00 to 15:30 – Q & A and close

The Gambling Commission officers present on the day will be [redacted]

There are limited places remaining at the event, so we may be able to accommodate additional bookings if you have additional colleagues who wish to attend. If you wish to book additional places, please confirm the name, account number of the relevant Operating Licence, and the email address of the person attending. We will come back to you next week to confirm if your booking request for additional places has been successful.

Best wishes

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From: [redacted]
To: [redacted]
Subject: Re: Gambling Commission Workshop - Leominster 4 February 2025
Date: 19 January 2025 12:55:15
Attachments: image003.png
image004.png

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Hi [redacted]

Yes, I will be attending.
Thank you for the invite

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 16 January 2025 09:31
Subject: Gambling Commission Workshop - Leominster 4 February 2025

Dear Licensee

Thank you for your booking to attend the Gambling Commission Compliance Workshop at Leominster on 4 February. We are pleased to confirm you have been allocated the places at this event that you requested. Please reply to this email by close of business on Friday 24 January to confirm your attendance, and whether you have any specific dietary requirements (e.g. gluten free, lactose free, or vegan). Vegetarian options will be provided.

The venue for the workshop is:

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Grange Court
Pinsley Road
Leominster
Herefordshire
HR6 8NL

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14:00 to 14:30 – Group discussion
14:30 to 14:45 – Break (tea and coffee will be provided)
14:45 to 15:00 – Group feedback
15:00 to 15:30 – Q & A and close

The Gambling Commission officers present on the day will be [redacted]

There are limited places remaining at the event, so we may be able to accommodate additional bookings if you have additional colleagues who wish to attend. If you wish to book additional places, please confirm the name, account number of the relevant Operating Licence, and the email address of the person attending. We will come back to you next week to confirm if your booking request for additional places has been successful.

Best wishes

[redacted]

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From: [redacted]
Subject: RE: GC Assessment Training
Date: 20 January 2025 11:28:42

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[redacted]

I will contact my colleagues and let you know about availability for Feb…

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 20 January 2025 09:57
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: GC Assessment Training

Hi [redacted]

I think, given the geography of where the persons delivering this reside, it is likely to be a Teams event next month.

Do you have any dates to avoid in February?

Thanks.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, January 20, 2025 6:51 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: GC Assessment Training

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

[redacted]

As per our previous discussions you will be aware that [redacted] previously offered to host the bacta MSO team at the GC to get greater insight as to how you prepare and carry out your GC assessments for AGC operators. I spoke with him last week and he asked me to contact you to arrange convenient dates for this training to take place. Any further insight would help us with the raising standard process….

Cheers [redacted]

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: FW: Gambling Commission Compliance Workshop - Glasgow 27 February 2025 (FOR ACTION BY CLOSE OF BUSINESS FRI 14 FEB)
Date: 22 January 2025 18:28:46
Attachments: image001.png
image002.png

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Hi [redacted]

Just to say [redacted], is no longer able to attend this event but I will attend in his place. Please add me to the list of attendees.

Bacta has agreed it will send reps to all 4 workshops to stress the importance of this issue to members.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Date: 21 January 2025 at 09:06:16 GMT
To: [redacted]@bacta.org.uk>
Subject: Gambling Commission Compliance Workshop - Glasgow 27 February 2025 (FOR ACTION BY CLOSE OF BUSINESS FRI 14 FEB)

Dear [redacted]

Thank you for your booking to attend the Gambling Commission Compliance Workshop in Glasgow on 27 February. We are pleased to confirm you have been allocated places at this event as you requested. Please reply to this email by close of business on Friday 14 February to confirm you are attending and whether you have any dietary requirements (e.g. gluten free, lactose free, or vegan). Vegetarian options will be provided.

The venue for the workshop is:

Buchanan Room
Mercure Glasgow City Hotel
201 Ingram Street
Glasgow
G1 1DQ

The venue is fully accessible. You can find information on travel to the venue here: Contact Us | Mercure Glasgow City Hotel Please note, the hotel is situated in the Glasgow Low Emission Zone. You can find details on exemptions and on how to pay the LEZ charge here: Glasgow's Low Emission Zone - Glasgow City Council

The agenda for the day is as follows:

09:30 to 10:00 – Arrival and registration (tea, coffee and pastries/biscuits will be provided)
10:00 to 10:30 – Customer interaction presentation
10:30 to 11:15 – Group discussion
11:15 to 11:30 – Break (tea and coffee will be provided)
11:30 to 12:00 – Group feedback
12:00 to 13:00 – Lunch and networking (lunch will be provided)
13:00 to 14:00 – AML presentation
14:00 to 14:30 – Group discussion
14:30 to 14:45 – Break (tea and coffee will be provided)
14:45 to 15:00 – Group feedback
15:00 to 15:30 – Q & A and close

The Gambling Commission staff who will be present on the day [redacted]

[redacted]

There are a limited number of places remaining at the event, so we may be able to accommodate additional bookings if you have any other colleagues who wish to attend. If you would like to book additional places, please confirm the name, account number of the relevant Operating Licence, and the email address of the person attending. We will come back to you to confirm if your booking request has been successful.

Best wishes

[redacted]

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From: [redacted]
To:
Subject: RE: GC Assessment Training
Date: 24 January 2025 14:46:00

Thanks [redacted]

I'm non too fussed about the premises, anywhere Midlands will be ok for me.

Expect the Teams invite shortly.

Regards.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, January 24, 2025 1:42 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: RE: GC Assessment Training

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

[redacted]

If you can set up the Teams meeting on this date, I will let my colleagues know....

Let me know if you want Staffs/ West Mids for a willing victim at an AGC and some convenient dates in due course...

Cheers [redacted]

From: [redacted] [redacted] <[redacted]@gamblingcommission.gov.uk>
Sent: 24 January 2025 12:33
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: RE: GC Assessment Training

Hi [redacted]

Having spoken to my colleagues, we can all do 1.30 PM on Friday 28 February.

If this is still ok with you? If so, I will add all the below to a Teams meeting at that time

where we can run through it with you.

I'll put it in for two hours, but it will probably not take that long and we will arrange to meet you all agreeable venues where we can go over what we look at etc. This will probably we more useful than the Teams meeting.

We don't all want to be travelling too far so if you can think of some operators that might want to allow us to visit them (it will not be a formal assessment) that would be great. Perhaps venues that are mutually agreeable with you would be the best. [redacted] Again, to get maximum benefit, AGC's would be better than FEC's.

We don't have much of a presence in the SW but hopefully [redacted] (who I think covers the SW) can meet us somewhere convenient.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, January 23, 2025 7:53 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: GC Assessment Training

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[redacted]

I have spoken to my colleagues and the only time/dates we are all available in Feb is as below:

17th Feb
26th Feb
28th Feb

All PM start

MSOs on the Teams call

[redacted]

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 20 January 2025 09:57
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: GC Assessment Training

Hi [redacted]

I think, given the geography of where the persons delivering this reside, it is likely to be a Teams event next month.

Do you have any dates to avoid in February?

Thanks.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, January 20, 2025 6:51 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: GC Assessment Training

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[redacted]

As per our previous discussions you will be aware that [redacted] previously offered to host the bacta MSO team at the GC to get greater insight as to how you prepare and carry out your GC assessments for AGC operators. I spoke with him last week and he asked me to contact you to arrange convenient dates for this training to take place. Any further insight would help us with the raising standard process....

[redacted]

[redacted]

29-30 Ely Place

From: [redacted]
To: [redacted]
Subject: [redacted] Commission Compliance Workshop - Glasgow 27 February
Date: 27 January 2025 09:04:00
Attachments: [redacted].png
[redacted].png

Hi [redacted]

Thank you for letting us know. We already had a place reserved for you at this event, so we have removed [redacted] from the list of attendees.

Best wishes

[redacted]
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From: [redacted] @bacta.org.uk>
Sent: Thursday, January 23, 2025 4:50 PM
To: [redacted] @gamblingcommission.gov.uk>
Subject: RE: Gambling Commission Compliance Workshop - Glasgow 27 February

You don't often get email from [redacted] @bacta.org.uk. Learn why this is important
CAUTION: This email is from an external source - be careful of attachments and links

Hi [redacted]

Sadly [redacted] is now unable to attend the meeting but I am able to attend in his place from Bacta.

[redacted]

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD

[redacted] @bacta.org.uk | Web: www.bacta.org.uk

From: [redacted] @gamblingcommission.gov.uk>
Date: 23 January 2025 at 11:56:45 GMT
To: [redacted] @bacta.org.uk>
Subject: Gambling Commission Compliance Workshop - Glasgow 27 February

Dear [redacted]

Thank you for your booking to attend the Gambling Commission Compliance Workshop in Glasgow on 27 February. We are pleased to confirm you have been allocated a place at this event. Please reply to this email by close of business on Friday 14 February to confirm you are attending and whether you have any dietary requirements (e.g. gluten free, lactose free, or vegan). Vegetarian options will be provided.

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Glasgow
G1 1DQ

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The Gambling Commission staff who will be present on the day are [redacted]

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Best wishes

[redacted]
[redacted]
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From: [redacted]
To: [redacted]
Subject: RE: BACTA Attendance at 2025 Spring Conference
Date: 28 January 2025 08:44:10
Attachments: image001.png

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

Hi [redacted]

Happy to go down to 2 from Bacta. We understand the capacity issues.

We are discussing who goes internally and will get back to you.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 27 January 2025 09:24
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: BACTA Attendance at 2025 Spring Conference

Good morning,

I hope you had a great weekend. Could I receive confirmation of the two BACTA attendees that will be present at this year's Spring Conference, please?

Thanks,
[redacted]

[redacted]

From: [redacted]
To:
Cc:
Subject: RE: SESOG - information reporting
Date: 28 January 2025 13:54:00
Attachments: image002.png

Hi [redacted]

Many thanks for sending the figures through. For the quarter 4 data, I just wanted to query the timeframe that the stats cover as they are titled 3 September to 31 December but our reporting period is from October to the end of December.

Kind regards

GAMBLING COMMISSION

[redacted]

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From: [redacted]

[redacted]@bacta.org.uk>
Sent: Tuesday, January 28, 2025 1:40 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: SESOG - information reporting

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Hi [redacted]

Sorry for the delay in getting this to you, I have only recently received it.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 24 January 2025 10:20
To: [redacted]@bacta.org.uk>
Subject: SESOG - information reporting

Hi [redacted]

Hope you're well.

Please would you send me the quarterly information reporting figures for July to September and October to December 2024 – here is the link to the question set Guidance on self-exclusion scheme provider information reporting

We are planning to present some of the data at Thursday's meeting and all the other schemes have submitted their figures so if you could send this through as soon as possible, that would be great. Some of the data in the presentation will be broken down by scheme so we need to include the Bacta stats to make this meaningful.

Kind regards

GAMBLING COMMISSION

[redacted]

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Hi [redacted]

Thanks for giving BACTA a second nudge.

Attendance at these workshops is unsurpassed in my experience, so we are doing very well. We usually open these events up to the entire land-based industry, not just AGC's, and the overall attendance is less than we have this time, despite only inviting the AGC sector.

That is an amazing result, so although Leominster is less popular, the events are a resounding success from an attendance perspective, and even with the lower numbers at Leominster this is the best engagement we have ever had - certainly in the nine years I have worked here

Best wishes

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, January 29, 2025 11:27 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Subject: RE: Hi

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

Hi [redacted]

I am just about to go into a meeting with our President and Vice President and will raise this issue. I am sure we can do push for attendance.

[redacted] – when we meet later today can we have a chat about this as well.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 29 January 2025 10:24
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: Re: Hi

Hi both,

It was good to see you at EAG. The first workshop is next Tuesday in Leominster, as it stands we are only about 50-60% full for that session, where other locations are 80%+. Could you please push this amongst your local members as it would be a shame for several of my team to come and work with ~20 people where we have capacity for 40.

Many thanks,

[redacted]

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, January 27, 2025 3:40 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Hi

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

Hi [redacted]

Sorry I haven't got back to you sooner, busy week with several meetings catching up after the show.

It was good chatting briefly with you at the show and I hope you enjoyed your well-earned beer.

Please find my contact details below.

I look forward to speaking soon.

Best wishes

[redacted]

[redacted]

[redacted]

[redacted]

bacta
Delivering the Serious Business of Fun for 50 Years

29-30 Ely Place

London

EC1N 6TD

From: [redacted]
To: [redacted]
Subject: Publication of our gaming machine consultation
Date: 29 January 2025 10:38:39
Attachments: image001.png
image002.png

Hi [redacted] and [redacted]

I hope you are well.

I am pleased to announce that we have published our consultation on gaming machines – January 2025 Consultation on proposed changes to the Gaming Machine Technical Standards, Gaming Machine Testing Strategy and Licence Conditions and Codes of Practice - The Gambling Commission - Citizen Space.

This consultation will run for 16 weeks and close on 20 May 2025.

Our intention was to arrive at a package of proposals that protect the vulnerable, ensures consumers can make informed decisions about their gambling and recognises the need to minimise the impact on consumers who are not experiencing difficulty in managing their gambling safely.

The consultation includes proposals to:

- introduce 5 new standards, a licence condition and a social responsibility code provision designed to support and empower consumers to use gaming machines safely at every stage of the customer journey – this includes proposals on time and monetary limit setting functionality and information provision such as safer gambling messaging and the display of net position and session time
- amend 3 existing standards having considered industry proposals to improve customer enjoyment and gameplay
- consolidate the existing 12 gaming machine technical standards into a single standard, whilst amending the format to be more consistent with our Remote gambling and software technical standards (opens in a new tab) for greater clarity
- update the gaming machine technical standards and the related testing strategy to remove obsolete material.

We recognise that regulatory changes that impact the design of machines can come with considerable costs. We are encouraging all stakeholders to share evidence that will assist us in measuring both the likely regulatory impacts of the proposed changes and the likely costs of implementing them. This evidence will be invaluable to helping make a robust assessment on whether the benefits to consumers are proportionate to the costs involved.

For industry, this will include targeted data/information requests exploring three areas:

- voluntary limit setting functionality (usage and outcomes) and gaming machine sessional data
- the number and type of gaming machines that can or cannot be updated to comply with our proposals, and
- the different commercial arrangements available to B2Cs if gaming machines

cannot be updated and therefore potentially need replacing.

I will provide a more detailed update on progress in this area under separate cover soon.

I would also like to take this opportunity to thank you and your members for the feedback provided previously during pre-consultation engagement and on the data/information requests. We believe your input (and the evidence provided within it) has had a positive impact on our finalised proposals and supporting material. For example,

- We have added a second consultation option for the 'limit setting' and 'display of sessional information' proposals that would exempt existing B3A and B4 gaming machines and/or games when made available for use in clubs
- We have limited the 'awards below the stake size' and 'prohibiting player-led features that permit a customer to reduce the time until the result is presented' proposals to new Cat B and Cat C gaming machines and/or games, thus removing existing games from those proposals
- For the 'awards below the stake size' and 'prohibiting player-led features that permit a customer to reduce the time until the result is presented' proposals, because neither rests on a sessional definition, we have softened our proposal to game compendiums, meaning that for these proposals new and existing games would be able to sit alongside one another
- Where existing gaming machines and/or games are within scope of our proposals we have extended the proposed implementation timeline from 18 months to 24 months.

I appreciate there is a lot of content to digest. I will therefore pick up potential engagement opportunities with you in a week or so.

Kind regards

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
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From: [redacted]
To: [redacted]
Cc: [redacted]
[redacted] Re: Hi
Date: 29 January 2025 14:09:17

Thanks [redacted] much appreciated.

Many thanks,
[redacted]

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, January 29, 2025 11:26 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: RE: Hi

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

Hi [redacted]

I am just about to go into a meeting with [redacted] and will raise this issue. I am sure we can do push for attendance.

[redacted] – when we meet later today can we have a chat about this as well.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 29 January 2025 10:24
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]bacta.org.uk>
Cc: [redacted]gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: Re: Hi

Hi both,

It was good to see you at EAG. The first workshop is next Tuesday in Leominster, as it stands we are only about 50-60% full for that session, where other locations are 80%+. Could you please push this amongst your local members as it would be a shame for several of my team to come and work with ~20 people where we have capacity for 40.

Many thanks,
[redacted]

[redacted]

From: [redacted]bacta.org.uk>
Sent: Monday, January 27, 2025 3:40 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Hi

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

Hi [redacted]

Sorry I haven't got back to you sooner, busy week with several meetings catching up after the show.

It was good chatting briefly with you at the show and I hope you enjoyed your well-earned beer.

Please find my contact details below.

I look forward to speaking soon.

Best wishes

[redacted]

[redacted]

[redacted]

bacta
Delivering the Serious Business of Fun for 50 Years

29-30 Ely Place
London
EC1N 6TD
[redacted]

From: [redacted]
To: [redacted]
Subject: RE: BACTA Attendance at 2025 Spring Conference
Date: 30 January 2025 09:53:51
Attachments: image001.png

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

Thanks [redacted]

Best wishes.

[redacted]

From: [redacted]gamblingcommission.gov.uk>
Sent: 30 January 2025 09:07
To: [redacted]@bacta.org.uk>
Cc: [redacted]bacta.org.uk>; [redacted]
[redacted]@bacta.org.[redacted]@bacta.org.uk>;
[redacted]
Subject: Re: BACTA Attendance at 2025 Spring Conference

Morning [redacted]

Thanks for this. I will add yourself, [redacted] and [redacted] to the waiting list and will let you know should any space become available.

Thanks,
[redacted]

[redacted]

[redacted]

GAMBLING COMMISSION

www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, January 29, 2025 16:22

To: [redacted]gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>;
[redacted]
Subject: RE: BACTA Attendance at 2025 Spring Conference

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

Hi [redacted]

Just to confirm that the following will attend from Bacta:

- [redacted]
- [redacted]

Kind regards.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 27 January 2025 09:24
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>;
[redacted]@bacta.org.uk>
Subject: Re: BACTA Attendance at 2025 Spring Conference

Good morning,

I hope you had a great weekend. Could I receive confirmation of the two BACTA attendees that will be present at this year's Spring Conference, please?

Thanks,
[redacted]

[redacted]

[redacted]

GAMBLING COMMISSION

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From: [redacted]
Sent: Tuesday, January 21, 2025 14:20
To: [redacted]bacta.org.uk[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk [redacted]@bacta.org.uk>
Subject: BACTA Attendance at 2025 Spring Conference

Dear [redacted],

Thank you for registering to attend the Gambling Commission's 2025 Spring Conference: Building the Bigger Picture: Evidence and Action Across Gambling.

Due to exceptional demand and limited capacity, we are only able to guarantee organisations two spaces at the event. We kindly ask you to confirm which two individuals from your organisation will be attending and we will advise in the coming weeks if we can give you more spaces.

We are sorry for any inconvenience this has caused, and we appreciate your understanding as we work to accommodate as many participants as possible at our conference.

Thanks,
[redacted]

[redacted]

[redacted]

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From: [redacted]
To:
Subject: RE: Bacta/Gambling Commission Roundtable
Date: 30 January 2025 10:46:56
Attachments: image001.png
image002.png
image003.png

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

Thanks [redacted]

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 30 January 2025 10:34
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.[redacted]bacta.org.uk>;
[redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Thanks [redacted] its great to see so many of you attending in person.

We look forward to seeing you next week but if you need anything further in the meantime please don't hesitate to ask.

Kind regards,
[redacted]

GAMBLING COMMISSION

[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]
Subject: Re: Gambling Commission Operator Exchange Forum Presentation
Date: 31 March 2025 11:33:38
Attachments: image001.png
Outlook-lxse2ba4.png
Outlook-5bgyqex4
Outlook-Graphical .png

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

Hi [redacted]

Thanks for the confirmation.

Hope the event goes well.

Best wishes.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, March 31, 2025 10:30:36 AM
To: [redacted]@bacta.org.uk>
Subject: Re: Gambling Commission Operator Exchange Forum Presentation

Hi [redacted]

Thank you for your patience, finalising the agenda has been tricky, on this occasion the agenda didn't allow for a slot on this topic as we prioritised the items that industry asked for. We would be happy to roll over the expression of interest for consideration for future events.

We look forward to seeing you at the event and hope it will be useful.

Kind regards,

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: 31 March 2025 07:48
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Fw: Gambling Commission Operator Exchange Forum Presentation

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

Hi OEF Team

Just double checking.

I didn't hear back from you on this.

Did we get a slot on the final agenda? I assume not but wanted to make sure.

Best wishes.

[redacted]

[redacted]

From: [redacted]gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 12:18 pm
To: [redacted]@bacta.org.uk>
Subject: Re: Gambling Commission Operator Exchange Forum Presentation

Hi [redacted]

Thank you very much for the information, we will be in touch soon.

The OEF Team

GAMBLING COMMISSION

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From: [redacted]@bacta.org.uk>

Sent: 25 February 2025 10:25
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Cc: [redacted]bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission Operator Exchange Forum Presentation

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

Hi OEF Team

I'm replying on behalf of [redacted]

[redacted] is keen to talk about the ongoing joint working between the Gambling Commission, trade associations and operators to raise standards across the board (eg in relation to social responsibility, technical standards and compliance issues); and say this method of partnership working is a model of how we should continue to operate in the future. He also wants to share examples of how this joint working is happening in practice.

He anticipates speaking for 10 minutes and allowing an additional 5 minutes for questions.

Best wishes.

[redacted]

From: [redacted]gamblingcommission.gov.uk>
Sent: 24 February 2025 12:11
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: Gambling Commission Operator Exchange Forum Presentation

Good morning,

I'm getting in touch as my colleague has passed on your details as you have expressed an interest in presenting at the upcoming Operator Exchange Forum. Please could you give me a few details such as which topic would you like to present on and how long the session would take roughly?

Many thanks in advance,

From: [redacted]
To:
Subject: SESOG data
Date: 31 January 2025 14:06:00
Attachments: image002.png

Hi [redacted]

Further to our conversation yesterday, please would you send through a copy of the Q3 data marked up as ‘October to December 2024’ so that we have an accurate record.

Kind regards

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]
[redacted]
Subject: Gaming Machine consultation - engagement opportunities
Date: 03 February 2025 11:23:00
Attachments: image001.png
image002.png

Hi [redacted] and [redacted]

I hope you are well.

I am just in the process of circling back to the trade bodies about engagement.

I think you know that I have agreed to attend to the BA/BACTA gaming machine workshop on March 18.

You previously shared the below opportunities too…

- Session with Bacta Gaming Council to discuss 'macro' issues around consultation document – this Council includes 20 industry leaders from across the UK from both large and small businesses
- Session with Bacta/Bingo Association Technical Standards Committee to discuss 'micro' or specific technical issues – this includes all the leading technical specialists
- BACTA - A visit to East Lincolnshire (Cleethorpes and Grimsby) to visit a seaside arcade and club to assess the impact of GMTS on these venues. We would be happy to arrange a suitable programme at a convenient time.

Would you be free on Thursday or Friday for a 30 min chat to chat things through. My dairy is pretty flexible in that whilst I have some meetings diarised they are internal ones that I can shift around.

From a personal perspective, I am really keen to take [redacted] idea forward re time with the manufacturers re technical challenges. Keen to hear how this might best work – perhaps a joint session with manufacturers reps and 121 follow-up calls to discuss any confidential issues/feedback? Appreciate this one may need a joint approach with GBG, BA and BGC.

Cheers

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[redacted]
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Outlook

04.02.25 - Letter from [redacted], Gambling Commission

From [redacted]
Date Tue 2/4/2025 10:54 AM
To [redacted]@bacta.org.uk>
Cc [redacted]@bacta.org.uk>

1 attachment (147 KB)
04.02.25 [redacted] letter to BACTA.pdf;

Dear [redacted]

Please find attached a letter sent on behalf of [redacted].

Best wishes,
[redacted]

GAMBLING COMMISSION

[redacted]
Mobile: [redacted]
www.gamblingcommission.gov.uk

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Bacta/Gambling Commission Roundtable
Date: 04 February 2025 14:34:10
Attachments: image001.png
image002.png
image003.png

Noted, thanks [redacted]

GAMBLING COMMISSION
[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Tuesday, February 4, 2025 2:29 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

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

Hi [redacted]

We have another member dialling in - [redacted]

Best wishes.

[redacted]

[redacted]
[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]
Sent: 04 February 2025 12:11
To: [redacted]gamblingcommission.gov.uk>

Cc: [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Hi [redacted]

Just to let you know that [redacted] will also 'dial in' to tomorrow's meeting (in addition to [redacted]).

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
[redacted]bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 31 January 2025 15:59
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>;
[redacted]bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Hi [redacted]

No problem, happy to add this item under AOB.

Have a great weekend.

Kind regards,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Friday, January 31, 2025 10:55 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>;
[redacted]@bacta.org.uk>
Subject: Re: Bacta/Gambling Commission Roundtable

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

Hi [redacted]

We have one additional item we'd like to raise at the meeting next Wednesday ie

- Gambling Survey of Great Britain (GSGB) - responding to misuse of data

Perhaps we could raise it under AOB?

Hope that's ok.

Best wishes.

[redacted]

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD

Mobile: [redacted]

Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 30 January 2025 10:33
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted] @gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>; [redacted] @bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Thanks [redacted] its great to see so many of you attending in person.

We look forward to seeing you next week but if you need anything further in the meantime please don't hesitate to ask.

Kind regards,

[redacted]

GAMBLING COMMISSION

[redacted]

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Thursday, January 30, 2025 10:04 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted] gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

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

Hi [redacted]

This is our cast list

BACTA PARTICIPANTS

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

Kind regards.

[redacted]

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD

Mobile: [redacted]

Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 30 January 2025 09:27
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted] <[redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Morning [redacted]

Hope all is well. Could you please let me know who will be attending the roundtable in person and who will be attending virtually next week so we can ensure those attending in person have access to our office building and we have the tech set up for anyone joining online.

Many thanks,

[redacted]

[redacted]
[redacted]
www.gamblingcommission.gov.uk

GAMBLING COMMISSION

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From: [redacted]
Sent: Friday, January 17, 2025 4:21 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>;
[redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Hi [redacted]

Great – thanks for sharing your agenda items and those who will be attending.

If you could please forward the calendar invite to all attendees that would be great, and I'll follow up with you closer to the time to find out who will be attending in person and who will be attending virtually so we can ensure you all have access to the building.

Have a good weekend.

Kind regards,

[redacted]

GAMBLING COMMISSION

[redacted]

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Friday, January 17, 2025 3:34 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: Bacta/Gambling Commission Roundtable

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

Hi [redacted]

See below our suggested agenda items and cast list for the 5 February 2025 meeting.

Let me know if you have any questions.

Best wishes.

[redacted]

BACTA AGENDA ITEMS

- State of Industry / Growth Agenda
- Gambling White Paper - Cashless and AGC Machine Numbers
- GC - Review of Technical Standards
- GC - Raising Standards in AGCs
- Review of Stakes and Prizes
- Bacta Convention, Thursday 27 November 2025 - Invitation for Andrew to Speak

BACTA PARTICIPANTS

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 14 January 2025 11:32
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Hi [redacted]

Hope you are well. I just wanted to circle back here to see if you had any updates on who will be attending and any suggested agenda items.

Look forward to hearing from you.

Kind regards,

[redacted]

[redacted]
[redacted]
www.gamblingcommission.gov.uk

GAMBLING COMMISSION

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From: [redacted]@bacta.org.uk>
Sent: Tuesday, December 17, 2024 5:28 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted] [redacted] [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

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

Hi [redacted]

I'm happy to confirm that **2.30pm on Wednesday 5 February 2025 in Birmingham** works for us.

[redacted] – has asked me to say we would be delighted to host a future meeting of this kind in our central London offices, assuming it was convenient for Andrew and [redacted]

In due course I will let you know 1) our cast list 2) details of anyone dialling-in 3) suggested agenda items.

Best wishes.

[redacted]

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD

Mobile: [redacted]

Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 17 December 2024 15:29
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>
Subject: Bacta/Gambling Commission Roundtable

Hi [redacted]

Hope you are well. I'm reaching out to you to coordinate the next Bacta/Gambling Commission Roundtable with Andrew Rhodes, CEO [redacted].

We have availability on **Wednesday 5 February at 2:30pm**, please could I ask that you explore your members availability for this date and let me know. As with previous meetings it should not last longer than 90 minutes and whilst we'd prefer it to be held in person at our offices in Birmingham, we can also offer hybrid if needed.

This is the draft agenda we are considering and as always, we welcome any items from you and your members:

- GC update
  - Update on GAR including Gaming Machine Technical Standards consultation
- Areas of interest raised by Bacta
- AOB

I've attached the action note from the last roundtable in July for your reference. I look forward to hearing from you.

Kind regards,

[redacted]

[redacted]
[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Bacta/Gambling Commission Roundtable
Date: 04 February 2025 13:27:40
Attachments: image001.png
image002.png
image003.png

No problem [redacted] thanks for letting me know.

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[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Tuesday, February 4, 2025 12:11 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

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

Hi [redacted]

Just to let you know that [redacted] will also 'dial in' to tomorrow's meeting (in addition to [redacted]).

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Bacta/Gambling Commission Roundtable
Date: 18 December 2024 11:04:19
Attachments: image001.png
image002.png

Hi [redacted]

Great, pleased to hear that the date and time work for you and we'd absolutely be open to holding the next one at your offices in London if convenient for Andrew and [redacted]

Look forward to hearing from you with the details, in the meantime we'll share a calendar invitation with you and [redacted] which can be forwarded on to your members.

Kind regards,
[redacted]

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[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]
To: [redacted]
Subject: Re: Bacta/Gambling Commission Roundtable
Date: 31 January 2025 16:11:58
Attachments: image001.png
image002.png
image003.png

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

Many thanks [redacted]

Have a good weekend.

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, January 31, 2025 3:59:14 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Bacta/Gambling Commission Roundtable

Hi [redacted]

No problem, happy to add this item under AOB.

Have a great weekend.

Kind regards,
[redacted]

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[redacted]

GAMBLING COMMISSION

04 February 2025

[redacted]
Bacta
29-30 Ely Place
London
EC1N 6TD

By email: [redacted]@bacta.org.uk

Dear [redacted]

New rules empowering consumers and boosting operator transparency

The Gambling Commission has today announced changes aimed at increasing consumer control over deposit limits and greater transparency of customer funds protection by operators.

A further change to the Commission's Licence Conditions and Codes of Practice (LCCP) will also pave the way for implementation of Government's upcoming statutory levy.

The changes follow a consultation and are consistent with the 2023 White Paper High stakes: gambling reform for the digital age.

New customer led tools

New rules will give consumers more effective ways to manage their gambling by making it easier to set and maintain deposit limits on their online accounts, in ways that work best for them.

From 31 October 2025 all gambling businesses must prompt their customers to set a financial limit before they make their first deposit and make it easy to review and alter this limit at any point after.

These rules will take good practice already offered by some operators and expand that so customers can expect the same standards across the industry. We have also made some changes following consultation to take into account practical issues and reduce the risk of any unintended consequences for consumers.

Gambling businesses will also be required to remind consumers every six months to review their account and transaction information – this will help consumers consider if they want to change existing, or set new, deposit limits.

Our work revealed recent changes by some operators on how deposit limits are offered, which could cause confusion for consumers. As a result, we will launch a short supplementary consultation on proposals to improve consistency and transparency for consumers on how financial limits work.

Victoria Square House
Victoria Square
Birmingham B2 4BP

T+44 121 230 6666
www.gamblingcommission.gov.uk

Transparency of protection of customer funds

Operators who hold customer funds must already set out in the terms and conditions whether these are protected in the event of insolvency, the level of such protection and the method by which this is achieved. They must also make this information available at the point at which a customer first deposits money.

The level of protection must be described as either 'not protected – no segregation', 'not protected – segregation of customer funds', 'medium protection' or 'high protection'.

From 31 October 2025 operators whose customer funds are 'not protected' in the event of insolvency must actively remind consumers once every six months that their funds are not protected.

Whilst there is no legal duty on gambling operators to protect customers funds in the event of insolvency, many of them do so voluntarily. The changes will help consumers understand which operators protect their funds and which do not – information which will support them in making choices about who they gamble with.

Changes connected with the new statutory levy

The Commission's LCCP currently requires operators to make annual financial contributions to a list of research, prevention and treatment organisations.

This requirement will be removed close to the introduction of the government's statutory levy (expected to come into force on 6 April 2025) as it will become obsolete. We will notify licensees of the date of implementation as soon as the Parliamentary process is complete.

These changes illustrate our commitment to ensuring gambling is fair and open by improving consumer empowerment and choice.

These changes will help consumers decide on deposit limits, enable them to keep track of their spending and ensure they are fully aware of what happens to their funds should an operator become insolvent.

We will now continue our work to deliver our remaining white paper commitments, including our programme of evaluation.

I hope you have found this letter useful. Please do not hesitate to get in touch if you have any questions.

Yours Sincerely

[redacted]

[redacted]

Action note: Gambling Commission – July Bacta Roundtable	
Attendees	[redacted]
Gambling Commission attendees	Andrew Rhodes (AR), [redacted]
Date	17 July 2024

Overview

The topics which were discussed as advertised in advance were:

1. Welcome and introductions
2. GC update
   a. Update on GAR
   b. Update on GSGB
   c. New operational points of contact
3. Areas of interest raised by Bacta
   a. Stake and Prize Review
   b. Technical Standards Review
   c. Introduction of Quarterly Returns
   d. Bacta Self-Exclusion Portal
   e. Illegal Machines
   f. GC Visits to Bacta members
4. AOB

Update on GAR

[redacted] that although the Commission are still waiting for ministerial appointment confirmation the assumption is that although there may be some areas Government will want to relook at, they are not expecting any major changes. Once the Commission receive confirmation, they will be able to continue with consultations.

Update on Gambling Survey for Great Britain (GSGB)

[redacted] provided an update on GSGB and the upcoming publication of the annual report (now published) as well as plans to issue a guide explaining how the statistics can and cannot be used (now published). He gave assurance that the Commission plan to combat any misuse of the statistics. One attendee said they have previously expressed concerns about the methodology and although they still have those concerns, they appreciate the effort the Commission is going to ensure the data is understood.

New operational points of contact

[redacted] advised that [redacted] will be their new operational points of contact as the Commission continue to look at strengthening relationships. Attendees welcomed this.

Stake and prize review

Attendees asked the Commission if they would have any objections with them pushing heavily on a review for stakes and prizes with the new Minister. [redacted] said not in principle, but it would be a matter for Government to resolve.

Technical standards review
Attendees gave an overview of the changes they are asking for to the existing technical standards and the importance of working with the Commission to get their asks recognised. [redacted] provided an overview of the work being undertaken by the Commission in this area which because of the election is currently paused until a steer from Government is received. He advised that the Commission had recently held some internal workshops to work through the proposals and some pre-consultation engagement with the industry would follow shortly.

Introduction of quarterly regulatory returns
Attendees asked the Commission to be patient as their members who have moved from annual returns to quarterly returns get used to the changes. They raised some concerns about the tone of communications which suggest that a delay or non-submission may result in further action being taken against the operator. [redacted] advised we want to improve the quality of date received from regulatory returns but reassured attendees that the Commission were not taking a zero-tolerance approach and want to work with the industry to get this right.
ACTION: The Commission to consider the tone in their communications regarding regulatory returns.

Attendees asked if it would be possible for Bacta's membership support officers to have access to the eservice's portal as a viewer, so they are able to assist with guiding their members through the process.
ACTION: The Commission to determine if providing viewer access to the eservices regulatory returns portal is possible.

Attendees asked if the Commission could provide training on the new requirements to their membership support officers.
ACTION: The Commission to assess if training on the regulatory returns changes can be accommodated.

Bacta self-exclusion portal
Attendees provided an update on their self-exclusion scheme and advised that they hope to have the system running by January 2025. [redacted] advised that the Commission's focus is that the scheme works as well as possible for consumers but how they decide to run it is in their gift.

Illegal machines
Attendees asked the Commission to take a stronger stance on combating illegal machines and suggested that the Commission should at least acknowledge any intelligence received. AR explained that the Commission is unable to comment on ongoing investigations and updates on intelligence are not typically given because of recourse capabilities but agreed that more could be done to at least let those providing intelligence know that they have received it and are looking at it.
ACTION: The Commission to consider how they can provide updates or acknowledgment on illegal gambling intelligence provided by operators.

GC visits to Bacta members
Attendees said they welcomed visits to their members and were looking forward to upcoming ones in August.

AOB

[redacted] advised that the Commission were planning to do some operator self-assessments in the coming weeks which would then help to inform which operators to visit. Attendees asked if they could have a copy of the survey beforehand so they are able to prepare for questions from their members and suggested that advance notice of items such as this would be helpful. [redacted] advised that the Commission can not to commit to this on every occasion because of urgency but where possible they can work together.

Attendees asked if the survey could be printable to allow easier collaboration with others. [redacted] advised that this was unlikely as the Commission are bound by Government accessibility requirements but they would look at attaching the survey questions to the email.

Actions

1. The Commission to consider the tone in their communications regarding regulatory returns.
2. The Commission to determine if providing viewer access to the eservices regulatory returns portal is possible.
3. The Commission to assess if training on the regulatory returns changes can be accommodated.
4. The Commission to consider how they can provide updates or acknowledgment on illegal gambling intelligence provided by operators.

For information:
More details on the changes to regulatory returns is available on the Commission website including access to guidance on how to answer the questions. Any feedback on the changes to regulatory returns can be shared with regulatoryreturns@gamblingcommission.gov.uk.

From: [redacted]
To: [redacted]k
Subject: Gambling Commission Compliance Workshop Feedback
Date: 05 February 2025 09:07:00
Attachments: image001.png
image002.png

Dear [redacted],

Thank you for attending our recent compliance workshop. Please click the link below to complete a short, anonymous survey about the day. Your honest feedback is important to help us improve our services.

We will send you the workshop handouts in early March, once all our compliance workshops have concluded.

Please complete the feedback survey within the next seven days, and we hope you enjoyed the workshop! Gambling Commission Compliance Workshop Evaluation (Page 1 of 5)

Best wishes,

[redacted]

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From: [redacted] on behalf of Andrew Rhodes
To: [redacted] Andrew Rhodes
Cc: [redacted]
Subject: RE: High Street Gaming
Date: 06 February 2025 17:02:50
Attachments: image001.png
image003.png

Dear [redacted]

Thank you for sharing.

Kind regards
[redacted]

GAMBLING COMMISSION

[redacted] for CEO Andrew Rhodes

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From: [redacted]@bacta.org.uk>
Sent: Thursday, February 6, 2025 4:48 PM
To: Andrew Rhodes [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: High Street Gaming

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Dear Andrew

Firstly, may I thank you for your time yesterday at our Roundtable meeting.

The BACTA team and I thought it a constructive and worthwhile meeting and am pleased that we can discuss openly and freely the important topics facing our sector.

I did mention that I would be writing to you direct regarding the position on High Street gaming machines and the trends over the last 6 years, and I attach letter together with the supporting stats. I thought you may find it an interesting read and vindicates action taken against the high stake B2 machine and the realignment of the marketplace.

With kind regards

29 - 30 Ely Place London EC1N 6TD
Telephone: 020 7730 6444

Andrew Rhodes
Chief Executive
Gambling Commission
Victoria Square House
Birmingham B2 4BP

6 February 2025

Dear Andrew

Thank you for meeting with Bacta yesterday.

We find these meetings useful, and I would re-iterate my invitation to have a future CEO roundtable at the Bacta Office in London assuming we can agree a mutually convenient slot.

I said I would write to you giving further reflections about the evolution of the Adult Gaming (AGC) market over the past few years and the state of the industry more generally.

- We have been interrogating the Gambling Commission industry statistics published in November 2024.
- By far the most significant policy development in land-based adult gaming in recent years was the reduction in the stake of B2 (FOBT) machines from £100 to £2 in April 2019.
- This was something that Bacta had campaigned for over a five year-period.
- The most useful baseline therefore is the full year from April 2018 to March 2019.
- If you compare the GGY in 2018/19 with GGY in 2023/24 the data indicates that LBO gaming machine GGY is down £591m over this period while AGC gaming machine GGY is up £232m and Bingo gaming machine GGY up £70m.
- Putting it another way, LBO's have lost around one third of their gaming machine revenue; and of the £591m LBO reduced gaming machine revenue 39% has been secured by AGCs, 12% by bingo with the remainder going elsewhere, presumably a large proportion to on-line.
- What we've witnessed is a recalibration of the adult gaming market.
- From a public policy perspective, this demonstrates the positive benefits of the B2 (FOBT) stake change ie nudging a significant number of customers from high-stake, high street gaming machines to AGCs which have gaming machines that are low-stake, low-prize in supervised environments with well trained staff focused on social responsibility.
- The changes in market share also reflect the significant investments many AGC operators made in AGCs following the FOBT stake change, to deliver more welcoming environments for customers.

- It should also be stressed that the increase in AGC GGY has not resulted because of an overall increase in the number of AGCs. Indeed, your data reveals that the number of AGCs actually went down by 13 from 2018/19 to 2023/24. This contrasts with a 2,391 reduction in the number of LBOs.
- Despite the increase in GGY it must be stressed that the economic climate for AGCs continues to be very challenging.
- As you said in our meeting simply looking at GGY does not give the full picture.
- The repeated year-on-year increases in the national minimum wage are adding to Bacta members' staffing costs. High energy costs are continuing to prevail. And the increases in Employers' National Insurance contributions will significantly impact bottom lines and negatively influence investment decisions.
- We fully support the Chancellor's focus on growth. In that light we are keen to see rapid progress towards the implementation of the White Paper reforms, changes to stakes and prizes and a proportionate approach to the reform of technical standards to help growth (or avoid stymieing it).
- I am attaching a series of tables we have produced extrapolating your statistics which underline our assessment of changing market dynamics.

I look forward to continuing our constructive dialogue.

Best wishes.

[redacted]

[redacted]

Email: [redacted]@bacta.org.uk
Mobile : [redacted]

From: [redacted]
To:
Subject: Re: GC Workshops
Date: 12 February 2025 15:51:16

Hi [redacted]

I'm on a course until Friday but will come back to you then.

Thanks

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, February 11, 2025 2:26:19 PM
To: [redacted]gamblingcommission.gov.uk>
Subject: GC Workshops

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[redacted]

Hope you are well. I was considering running an additional workshop/ presentation in the North West for bacta members with one of my colleagues. I am looking at early March and would probably do it in Blackpool. I would primarily cover customer interaction and money laundering.

Any chance you can share the slide presentation with me. My provisional date is Thurs 6th March don't know if you want to join in....

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

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From: [redacted]
To:
Cc:
Subject: RE: Assurance Statements
Date: 18 February 2025 11:50:24
Attachments: image002.png

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Many thanks [redacted]

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 18 February 2025 11:48
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Assurance Statements

Hi [redacted]

All three templates will be out shortly.

There is a B2B template for any members who are in scope that hold a B2B related licence. Some operators may hold a B2C and B2B type licence, so they would need to complete both if that is the case.

Kind Regards

[redacted]

From: [redacted]@bacta.org.uk>

Sent: Tuesday, February 18, 2025 11:36 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: FW: Assurance Statements

> You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

Looking forward to receiving the templates in due course.

I had a preliminary question: if this is only going to be for B2C or will it also cover B2B?

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]
To: Andrew Rhodes
Cc: [redacted]
Subject: RE: Bacta Roundtable action note
Date: 18 February 2025 10:57:28
Attachments: image002.png

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

Thanks [redacted]

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
[redacted] bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk> **On Behalf Of** Andrew Rhodes
Sent: 18 February 2025 10:48
Subject: Bacta Roundtable action note

Dear all,

Please see attached the action note following the roundtable held at our offices on 05 February 2025.

Kind regards
[redacted]

GAMBLING COMMISSION

[redacted] for CEO Andrew Rhodes

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This email and any files transmitted with it are intended solely for the use of the

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Assurance Statements
Date: 18 February 2025 12:51:00
Attachments: image002.png
Draft 2025 Annual Assurance Statement Templates.pdf

Good Afternoon both,

Following on from [redacted] email below, I have attached the Annual Assurance Statement templates for this year's cycle.

If you or any of your members who are in scope would like to submit feedback on the templates, could you please provide this by 14 March.

Kind Regards

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, February 14, 2025 10:33 AM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Assurance Statements

Hi both,

As in previous years we will be asking the largest operators (by gross gaming yield) to complete an assurance statement. These are a set of statements that the board need to sign off that they are assured of compliance in key areas.

I was hoping to send the templates to you [redacted] but we are just finalising them now, so they will be sent to you by [redacted] in the coming days. You will have the opportunity to review and feedback until 14 March and they will then be circulated to operators late March for a 31 May completion (for those who have submitted before) and 30 June (for those new to the process).

Following discussion and feedback at with our Industry Forum we have made a few changes this year to make the assurance statements more helpful to operators and to us.

1. Statements are slightly more specific than previous years

   By being more specific and transparent with operators, in terms of drawing operators' attention to where we are finding specific compliance issues, it is hoped that this will focus operators' attention to these areas for review.

2. This years process will break out non-remote and remote for B2C

   Previously online and land-based operators were together under one B2C template. This change has helped us target more specific requirements where sections of the LCCP only apply to either the remote or non-remote sector, for example customer interaction.

3. We have reduced the threshold for those in scope - GGY >£25m

   Previously the threshold was >£50m. We have reduced it to align with the thresholds we use to group operators when considering our risk monitoring and assurance approach. This group of operators is also expected to receive an account manager in the coming year and we believe the assurance statements will support effective initial conversations.

4. Operators are being asked to provide information which sets out how their board have been assured

   This will enable us to understand the process and level of detail the board have been provided with which has enabled them to provide assurance or not in those areas. Going forward we are looking at different methods of receiving assurance from operators directly and understanding their internal assurance processes will enable us to consider this more effectively.

If you have any questions please let us know.

Many thanks,

[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

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Action note: Gambling Commission – February 2025 Bacta Roundtable	
Attendees	[redacted]
Gambling Commission attendees	Andrew Rhodes (AR), [redacted])
Date	5 February 2025

The topics which were discussed as advertised in advance were:

1. GC update
    - Update on GAR including Gaming Machines consultation
    - Raising standards in AGC's
2. Areas of interest raised by Bacta
    - State of Industry/Growth Agenda
    - Gambling White Paper - Cashless and AGC Machine Numbers
    - Review of Stakes and Prizes
    - Bacta Convention, Thursday 27 November 2025 - Invitation for Andrew to Speak
3. AOB

Update of GAR including gaming machine consultation

[redacted] discussed the current live gaming machine consultation and encouraged them to share their best possible evidence on the implementation costs of updating machines as it will allow the Commission to do a robust assessment of the proposals. Attendees praised the pre consultation engagement from the Commission and shared that they felt it had been handled well. They were pleased to see those conversations reflected in the consultation document.

Attendees shared their concerns around some of the proposed changes and the impact this will have particularly on smaller businesses. Overall, the cost will be significant for the sector and resource limitations to make technical changes to machines will be difficult. They are however supportive of any changes that improve social responsibility and are representative of the environment. They indicated that they will be working hard with their members who don't typically have the capacity to engage, to share their views. [redacted] stressed the importance of not wasting the opportunity to respond to the consultation and provide evidence.

[redacted] provided an update on the recently published consultation responses. There was a conversation on the statutory levy with one attendee asking if the Commission would publish guidance on the transition. Andrew Rhodes (AR) said no as DCMS will be clear about what happens in the transition period but reassured that DCMS are mindful of it needing to be orderly. He clarified the Commission's role will be to collect the money only.

There was a discussion about other white paper provisions which are being led by DCMS and the need for a Ministerial steer before they can be progressed.

Raising standards in AGC's

[redacted] provided an overview of recent compliance activity including a series of workshops that had recently started. Attendees raised that some of their members were unclear about the compliance assessment process and the feeling that goal posts around levels of compliance have changed which they feel would be helpful to be aware of. [redacted] reassured them that there have been no changes, but the Commission are now looking at certain areas in more depth which may have caused differing compliance outcomes. The workshops have been developed to allow the Commission to work with the sector to raise standards and help organisations understand what is being looked at during an assessment. [redacted] encouraged

attendees to remind their members and colleagues that self-assessment questionnaires are a formal assessment and should be completed accurately and honestly.

State of industry/growth agenda
One attendee asked for permission to write to AR to share some findings that suggest the overall growth of their sector has dropped over the last 5-6 years, particularly since the reduction of stakes on FOBT machines were introduced. He said it was important to remember that GGY is not profit. AR agreed that GGY was not profit and does not provide any context, he welcomed the data they have being shared. Following the meeting, a letter outlining these findings has been received by the Commission.

Stakes and prizes
Attendees said they would like the Minister to call a review and hopes the Commission would be supportive. AR said the Commission would not be opposed to it, but it is with DCMS to decide if/when it takes place.

GSGB
One attendee expressed frustration at people constantly misusing GSGB data and the concern that it could lead to debates on public policy. [redacted] advised that the Commission will be making some slight tweaks to the guidance, and more may come following recommendations from OSR. [redacted] also outlined wanting to increase transparency around the action the Commission has taken on the misuse of statistics with the aim being to share those details on their website, subject to compliance with data protection requirements. This idea was welcomed by attendees.

[redacted] shared details on two deep dive reports on the topics of why people gamble and PGSI scores and the relationship between gambling activities which he encouraged them to read. He said they provide a wider context and are a good example of needing to look further into the data instead of taking the headline figures only. He stated that the Commission will continue to communicate that we will not use any set of data in isolation to make substantive decisions on policy. AR clarified that if the public policy debate shifts, the Commission will submit advice to Government, even if it hasn't been requested.

Attendees said they had been working closely with the BGC who have mentioned a workshop which they would be happy to join. AR said that it had been agreed in principle but the framing of it will need to be clear.

AOB
Attendees invited AR to speak at their next Convention on 27 November 2025 and an official invitation would follow. It was advised that the date had been blocked out in AR's calendar.

Actions
No actions were recorded during the meeting.

From: [redacted]
To: [redacted]
Subject: RE: Paid Age Verification Purchase / Annual Submission
Date: 21 February 2025 10:39:00
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png

Morning [redacted]

As we discussed on our call just, our Policy team have sent a response to your enquiry to [redacted] at BACTA.

If you have any further questions, please just get in touch.

Kind regards
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, February 20, 2025 11:38 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Paid Age Verification Purchase / Annual Submission

> You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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

Hi!
That's great thank you. We would like to get a bulletin out on 28th Feb if possible so if there is any chance of confirmation before then that would be very much appreciated.

Kindest regards

[redacted]

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Wednesday, February 19, 2025 9:52:21 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Paid Age Verification Purchase / Annual Submission

Morning [redacted]

[redacted]

I will follow this matter up and will get a response back to you in due course. In the meantime, please advise your members to continue with submissions in line with the current process.

Kind regards
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, February 14, 2025 4:27 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Paid Age Verification Purchase / Annual Submission

> You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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

Hi [redacted]
Hope you are well. Just following on from the brief chat at EAG regarding this and wondered if there was confirmation that the submission was to stay at the end of the fiscal year or if it was being moved to be in line with the new dates for testing i.e. Sept - Aug?

Many thanks!

Kindest regards

[redacted]

bacta
Empowering the UK's amusement machine industry

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Re a query TP/AV and results
Date: 21 February 2025 08:04:27

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

Morning [redacted]

You are up nice and early.

I have a couple of [redacted] that I deal with do you have his surname?

I know some Trade Associations such as the Bingo Association provide this information to you on behalf of their members. However, whilst Bacta have helped to provide a third party company to carry out the testing for our members it has always been the members responsibility to provide the information directly to yourselves.

As always happy to jump on a call with you at any time.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 21 February 2025 05:15
To: [redacted]bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: Re a query TP/AV and results
Importance: High

HI there [redacted] – we have received a query from a colleague of yours – [redacted] – regarding the above and the timescales for reporting requirements. I understand that BACTA are intending to disseminate some info to members on the 28th of this month. I do not have his email address. However, for ease of reference please see below my mail from September of 2024 in relation to this matter. Happy to discuss further with [redacted] if that helps. Best [redacted]

Hi [redacted]

The Commission thought it would be timely to remind relevant Trade Associations in regard to the AV testing processes for the NR sector. You are no doubt aware the

smaller (Cat A and B operators) are now required to conduct AV TP as well as submit the results themselves, not via their TA. Should you not have already done so (which you may well have done) it might be timely to give them a nudge. The E Bulletin has already issued a number of reminders. The following was published on 1st May 2024.
Summer 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response - Summary - Strengthening age verification in premises (gamblingcommission.gov.uk)

Secondly there is an ordinary code provision regarding under 25s which affects all operators irrespective of size. This is also covered in the E Bulletin.

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From: [redacted]
To:
Subject: RE: GC Workshops
Date: 24 February 2025 08:54:00

Thanks [redacted]

I am told, the slides will be shared following the last workshop in Glasgow on Thursday.

Regards.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Saturday, February 15, 2025 7:25 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: GC Workshops

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[redacted]
Thanks for the heads up. I have booked the Dalmeney Hotel on Thurs 6/3 in Lytham St Anne's. It will be helpful if I can have the slides as soon as possible to do my prep. I won't share with anyone....

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, February 14, 2025 4:53:40 PM
To: [redacted]@bacta.org.uk>
Subject: RE: GC Workshops

Hi [redacted]

I've asked the question if we can share the slides and don't see it as a problem.

I'm off for a week but should have an answer before the next workshops.

Regards.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, February 11, 2025 2:26 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: GC Workshops

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

[redacted]

Hope you are well. I was considering running an additional workshop/ presentation in the North West for bacta members with one of my colleagues. I am looking at early March and would probably do it in Blackpool. I would primarily cover customer interaction and money laundering.

Any chance you can share the slide presentation with me. My provisional date is Thurs 6th March don't know if you want to join in....

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

bacta
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From: [redacted]
Subject: RE: Handouts - Gambling Commission Compliance Workshop
Date: 24 February 2025 09:29:00
Attachments: image001.png
image002.png

Thanks [redacted]

Yes, I think it would good to know who is engaging.

Thank you.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, February 24, 2025 9:06 AM
To: [redacted]gamblingcommission.gov.uk>
Subject: FW: Handouts - Gambling Commission Compliance Workshop

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

[redacted]

I received a PDF of the slides on 19/2 as below I presumed this was as a result of our e mail exchange. In terms of my presentation/workshop on 6/3 there will be a number of my NW members attending some whom will be attending workshops and others watching the webinar in due course. Is there any value in you knowing who is attending my event in terms of brownie points for them for wanting to know more about CI & AML.

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 19 February 2025 15:14
To: [redacted]y@bacta.org.uk>
Subject: Handouts - Gambling Commission Compliance Workshop

Dear [redacted]

Please find attached a copy of the handouts from the Gambling Commission compliance workshop on 4th February.

Best wishes,

[redacted]

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: Re: Gambling Commission Operator Exchange Forum Presentation
Date: 25 February 2025 11:18:42
Attachments: image001.png

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

Hi [redacted]
I know I've registered for this, but [redacted] was also very keen on attending.
How many of us can they accommodate?
Regards
[redacted]

Sent from Outlook for iOS

From: [redacted]@bacta.org.uk>
Sent: Tuesday, February 25, 2025 10:25:53 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission Operator Exchange Forum Presentation

Hi OEF Team

I'm replying on behalf of [redacted]

[redacted] is keen to talk about the ongoing joint working between the Gambling Commission, trade associations and operators to raise standards across the board (eg in relation to social responsibility, technical standards and compliance issues); and say this method of partnership working is a model of how we should continue to operate in the future. He also wants to share examples of how this joint working is happening in practice.

He anticipates speaking for 10 minutes and allowing an additional 5 minutes for questions.

Best wishes.

[redacted]

[redacted]

[redacted]@bacta.org.uk>
Subject: Gambling Commission Operator Exchange Forum Presentation

Good morning,

I'm getting in touch as my colleague has passed on your details as you have expressed an interest in presenting at the upcoming Operator Exchange Forum. Please could you give me a few details such as which topic would you like to present on and how long the session would take roughly?

Many thanks in advance,

Kind regards,

OEF Team

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Potential support required
Date: 26 February 2025 09:17:59
Attachments: image001.png
image002.png

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 25 February 2025 21:07
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]
[redacted]
Subject: Re: Potential support required

Thanks [redacted] and [redacted] I will leave [redacted] to take this forward.

Regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, February 25, 2025 4:17:54 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Cc: [redacted]
[redacted]@bacta.org.uk>; [redacted]
Subject: RE: Potential support required

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

Hi [redacted] and [redacted]

We raised this at Bacta's Gaming and Amusement Councils which took place today.

I'm copying in [redacted] who said he was happy to chat to [redacted] to find out more.

Other members who said they were happy to help in principle but asked 1) how many machines you had in mind 2) if the location was just London or elsewhere in the UK.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 24 February 2025 15:19
To: [redacted]@bacta.org.uk>; [redacted] [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Potential support required

Many thanks [redacted] I am of course more than happy to chat with any member who feels able to assist in this matter. Managing illegal machines and casinos is a major priority for GC. Thanks [redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, February 24, 2025 2:56 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted] [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Re: Potential support required

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

Hi [redacted]

By good chance we have our Gaming Council tomorrow and we can ask at the meeting who might be able to assist.

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, February 24, 2025 2:16:24 PM
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: Potential support required

Hi [redacted]

[redacted] is our shared regulation lead (amongst other things) and supports licensing authorities in their gambling role/duties.

In the past, licensed suppliers have supported enforcement work by storing and/or safely disposing of machines that have been seized due to illegal supply… We are seeking similar support (potentially) at this time linked to work being undertaken in and around London. [redacted] wondered if you could advise of any members that may be able to help in this work. For more information you are best to reach out directly to [redacted] – my purposes was to just make introductions and provide a brief summary.

Hope the above makes sense.

Cheers

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Re a query TP/AV and results
Date: 27 February 2025 11:33:34

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

Hi [redacted]

I will send a teams invite.

Speak soon.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 27 February 2025 10:40
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: RE: Re a query TP/AV and results

Hi there [redacted] thanks for this. Is 9.30 am any good for you? [redacted]

From: [redacted]bacta.org.uk>
Sent: Thursday, February 27, 2025 10:18 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: RE: Re a query TP/AV and results

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

Hi [redacted]

I hope you are well.

Are you available for a quick teams call on Monday afternoon.

[redacted]

Best wishes

[redacted]

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: Re: Attendance at Operators Engagement Forum
Date: 04 March 2025 10:49:27
Attachments: image001.png
Outlook-Shape Des.png
Outlook-Shape Des.png
Outlook-Shape Des.png

Perfect, thanks [redacted]

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[redacted]

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From: [redacted]bacta.org.uk>
Sent: Tuesday, March 4, 2025 10:40
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: Attendance at Operators Engagement Forum

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

I'm happy to step aside for [redacted]

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 10:37:09 AM
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: Attendance at Operators Engagement Forum

Thanks both. Who would [redacted] be attending in place of and are you aware of any dietary/accessibility requirements he may have?

Thanks,
[redacted]

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 4, 2025 10:34
To: [redacted]@bacta.org.uk>; [redacted]
<[redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: Attendance at Operators Engagement Forum

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

Thanks [redacted] Would be great if [redacted] was also able to attend.

Best wishes.

[redacted]

[redacted]

[redacted]@bacta.org.uk>
Sent: Tuesday, March 4, 2025 10:33:30 AM
[redacted]@gamblingcommission.gov.uk>; [redacted]
@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: Attendance at Operators Engagement Forum

I believe [redacted] wanted to attend.
Thank you
[redacted]

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 10:27:55 AM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]

[redacted]@bacta.org.uk>
Subject: Re: Attendance at Operators Engagement Forum

Morning all,

We have had an extra seat become available at the Operators Engagement Forum, so if you would still like 3 places you are welcome to have them.

Thanks,
[redacted]

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[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, February 19, 2025 11:44
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Attendance at Operators Engagement Forum

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

Many thanks [redacted]

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]gamblingcommission.gov.uk>
Sent: 19 February 2025 10:17
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: Attendance at Operators Engagement Forum

Morning,

Thanks, [redacted]

With regards to the presentation, we're currently working on the agenda and have shared your willingness to present with the event team, so somebody will reach out to you shortly with more information on this part of that day.

Cheers,
[redacted]

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[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Tuesday, February 18, 2025 11:19
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Attendance at Operators Engagement Forum

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

Thanks [redacted]

Understood. We will confer and revert.

On a related point under the agenda item “Trade body and operator insights” will Bacta have the chance to present? [redacted] expressed an interest.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 17 February 2025 16:46
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Attendance at Operators Engagement Forum

Good afternoon all,

Thank you for registering to attend the Gambling Commission's Operators Engagement Forum.

Due to exceptional demand and limited capacity, we are only able to guarantee organisations two spaces at the event. We kindly ask you to confirm which two individuals from your organisation will be attending and we will advise in the coming weeks if we can give you more spaces.

We are sorry for any inconvenience this has caused, and we appreciate your understanding as we work to accommodate as many participants as possible at our event.

Thanks,
[redacted]

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From: [redacted]
To: [redacted]
Subject: Re: BACTA Attendance at 2025 Spring Conference
Date: 04 March 2025 09:37:32
Attachments: Outlook-Shape Des.png

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

FYI

Regards

[redacted]
Sent from my iPhone

> On 4 Mar 2025, at 09:19, [redacted] <[redacted]@gamblingcommission.gov.uk> wrote:
>
> Hi [redacted]
>
> I hope this finds you well. My colleague [redacted] tells me he hasn't heard back from you on the below. Would either of you like to take up the offer of an extra seat for Bacta tomorrow?
>
> Thanks,
>
> [redacted]
>
> ---
>
> **From:** [redacted]@gamblingcommission.gov.uk>
> **Sent:** Friday, February 28, 2025 08:59
> [redacted] [redacted]@bacta.org.uk <[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk [redacted]@bacta.org.uk>
> **Subject:** Re: BACTA Attendance at 2025 Spring Conference
>
> Morning both,
>
> Hope you're good. We've had a drop out and are now able to offer you another space for the conference, if either of you would like to join?
>
> Let me know!
>
> Cheers,
> [redacted]

<Outlook-Shape Des.png>

[redacted]

[redacted]

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From: [redacted]
Sent: Tuesday, January 21, 2025 14:20
To: [redacted]@bacta.org.uk [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk [redacted]@bacta.org.uk>
Subject: BACTA Attendance at 2025 Spring Conference

Dear [redacted],

Thank you for registering to attend the Gambling Commission's 2025 Spring Conference: Building the Bigger Picture: Evidence and Action Across Gambling.

Due to exceptional demand and limited capacity, we are only able to guarantee organisations two spaces at the event. We kindly ask you to confirm which two individuals from your organisation will be attending and we will advise in the coming weeks if we can give you more spaces.

We are sorry for any inconvenience this has caused, and we appreciate your understanding as we work to accommodate as many participants as possible at our conference.

Thanks,
[redacted]

<Outlook-Shape

[redacted]

[redacted]

www.gamblingcommission.gov.uk

Hi [redacted]

The 9th April should be fine, I've stuck it in the calendar, thanks.

As far as surrendering a licence, as long as it's done as explained on our website Surrender your operating licence that is all that's required.

Kind regards
[redacted]

GAMBLING COMMISSION
[redacted]
[redacted]
[redacted]
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[redacted]@bacta.org.uk>
Sent: Monday, March 3, 2025 11:46 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Co-visit

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

Hi [redacted]
Just to follow up from the voicemail. [redacted]

Also I have an operator who wishes to "de-register" so wants to know the process to surrender his operator's licence. I'll send them the link from the GC website but it was just if there was anything that operator's tend to miss that you would want me to prompt them on. Many thanks!

Kindest regards

[redacted]

29-30 Ely Place

London

EC1N 6TD

Mobile: [redacted]

Main Line: [redacted]

Web: www.bacta.org.uk

Don’t forget to follow bacta and tickets2wishes on social media - Support #Tickets2Wishes to help Rays of Sunshine grant wishes to children with terminal or life-limiting conditions

@bactauk @tickets2wishes

This message is intended solely for the addressee and may contain confidential information.

If you have received this message in error, please send it back to us, and immediately and permanently delete it. Do not use, copy or disclose the information contained in this message or any attachments.

From: [redacted]@gamblingcommission.gov.uk>
Sent: 28 February 2025 4:12 PM

To: [redacted]@bacta.org.uk>
Subject: RE: Co-visit

Hi [redacted]

I'm on leave from 18th April so anytime before that suits me currently.

Cheers
[redacted]

GAMBLING COMMISSION
[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Friday, February 28, 2025 3:30 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Co-visit

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

Hi!
I was literally just ringing you to discuss when your email came through. I wanted to check what your availability was like for April as my diary is a bit bonkers for March so I'm not sure if I can squeeze anything else in. If you could let me know any dates I need to avoid and I'll see what I can organise. Many thanks and have a great weekend too.

Kindest regards

[redacted]
[redacted]
[redacted]
[redacted]
[redacted]
[redacted]

bacta
Empowering the UK's amusement machine industry

29-30 Ely Place

London

EC1N 6TD

Mobile: [redacted]

Main Line: [redacted]

Web: www.bacta.org.uk

Don't forget to follow bacta and tickets2wishes on social media - Support #Tickets2Wishes to help Rays of Sunshine grant wishes to children with terminal or life-limiting conditions

@bactauk @tickets2wishes

This message is intended solely for the addressee and may contain confidential information.

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From: [redacted]@gamblingcommission.gov.uk>
Sent: 28 February 2025 3:27 PM
To: [redacted]@bacta.org.uk>
Subject: Co-visit

Hi [redacted]

Just let me know your thoughts on what was discussed about carrying out a premises visit. I'm happy to travel somewhere mutually convenient where you have a willing member happy to host.

Have a nice weekend.

Kind regards
[redacted]

GAMBLING COMMISSION

[redacted]

[redacted]

www.gamblingcommission.gov.uk

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This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

From: [redacted]
Subject: Re: Co-visit
Date: 08 April 2025 11:03:49
Attachments: image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
image012.png

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Hi [redacted]
Yes most definitely. I know let's hope it holds! See you tomorrow .

[redacted]

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, April 8, 2025 9:22:23 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Co-visit

Hi [redacted]

Just checking we're all still good for tomorrow? Weather 's looking good for the drive!

Kind regards
[redacted]

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[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Thursday, March 6, 2025 2:39 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Co-visit

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

Perfect see you then!

Kindest regards

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

bacta
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29-30 Ely Place

London

EC1N 6TD

[redacted]

[redacted]

Web: www.bacta.org.uk

EAG ENTERTAINMENT, ATTRACTIONS & GAMING INTERNATIONAL EXPO
16-18 JANUARY 2024 | EXCEL, LONDON

Don't forget to follow bacta and tickets2wishes on social media - Support #Tickets2Wishes to help Rays of Sunshine grant wishes to children with terminal or life-limiting conditions

@bactauk @tickets2wishes

CYBER ESSENTIALS CERTIFIED

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From: [redacted]@gamblingcommission.gov.uk>
Sent: 06 March 2025 9:42 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Co-visit

Hi [redacted]

That sounds good. Around 10:30 suits for me.

Kind regards
[redacted]

GAMBLING COMMISSION
[redacted]
[redacted]
www.gamblingcommission.gov.uk
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From: [redacted]@bacta.org.uk>
Sent: Thursday, March 6, 2025 9:00 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Co-visit

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

Hi [redacted]
Great - what time would suit?
The easiest parking is in The Bridges Rooftop car park. It's all automated and if you get the lift down you just straight head out the doors in front of you and it takes you to the rear entrance of Arcadia.

Kindest regards

[redacted]

Sent from Outlook for iOS

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 9:17:22 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Co-visit

From: [redacted]
To: [redacted]
Subject: RE: BACTA Attendance at 2025 Spring Conference
Date: 04 March 2025 09:27:00
Attachments: image001.png

Thanks [redacted] no problem, we just wanted to make sure you had the chance.

Thanks,

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 4, 2025 9:22 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: BACTA Attendance at 2025 Spring Conference

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

Hi [redacted]

My apols. It was kind of you to come back to us but it'll be just [redacted] and [redacted] from Bacta attending tomorrow.

Hope the event goes well.

Best wishes.

[redacted]

[redacted]
[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 4, 2025 9:19 am
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: FW: BACTA Attendance at 2025 Spring Conference

Hi [redacted]

I hope this finds you well. My colleague [redacted] tells me he hasn't heard back from you on the below. Would either of you like to take up the offer of an extra seat for Bacta

GAMBLING COMMISSION

26 March 2025

[redacted]

By email: [redacted]@bacta.org.uk

Dear [redacted]

Gambling promotions to be safer and simpler

I am writing to you today to advise you on new rules increasing the safety and simplicity of consumer promotional offers are to be introduced by the Gambling Commission.

Gambling businesses will be banned from offering potentially harmful offers involving consumers having to carry out two or more types of gambling, such as betting and playing slots. Operators will also be limited on the number of times bonus funds must be re-staked before the consumer can withdraw winnings from the bonus. The changes follow a consultation and are consistent with the 2023 White Paper High stakes: gambling reform for the digital age (opens in new tab).

Mixed product promotion ban

Mixed product promotional offers provide bonuses on the condition the consumer plays different products, such as betting and playing slots. But evidence shows consumers are more at risk of harm when they gamble on multiple products rather than a single product. There is also the risk that mixed product promotions confuse consumers because of complex terms and conditions. The ban is aimed at reducing harm and boosting fairness and openness.

Bonus wagering requirements limited to ten

Some promotional offers provide bonus funds to consumers on the condition the consumer re-stakes any winnings multiple times before being allowed to withdraw winnings from the bonus. For example, a £10 bonus with a 50 times wagering requirement requires the consumer to play through £500 before the winnings can be withdrawn.

Such high wagering requirements could confuse consumers and lead them to gamble for longer, and faster, than they are used to. Capping the wagering requirement to ten decreases

Victoria Square House
Victoria Square
Birmingham B2 4BP

T+44 121 230 6666
www.gamblingcommission.gov.uk

the likelihood of harm, reduces complexity, and improves transparency while maintaining consumer choice.

Rewording the rewards and bonus section of Licence Conditions and Codes of Practice (LCCP)

To ensure increased clarity of the Commission's current expectations of operators it will alter the structure and wording of Social Responsibility Code 5.1.1 (Rewards and Bonuses). Full details of these changes can be found in the response document Autumn 2023 consultation – Proposed changes to LCCP and RTS - Socially responsible incentives: Consultation Response

All changes will come into force on 19 December 2025.

These changes will better protect consumers from gambling harm and give consumers much better clarity on, and certainty of, offers before they decide to sign up.

I hope you have found this letter useful. Please do not hesitate to get in touch if you have any questions.

Yours Sincerely

[redacted]

[redacted]

Hi [redacted]

It was very useful to have our catch up. I hope all went well subsequently. Feel free to contact me if anything further is required, best [redacted]

From: [redacted]
To: [redacted]
Subject: RE: North West Raising Standards meeting
Date: 07 March 2025 13:52:00

Thanks [redacted]

Noted.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, March 7, 2025 12:53 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: North West Raising Standards meeting

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

[redacted]

Further to our GC Assessment Teams Meeting the other day. On Thursday 6th March I hosted Bacta North- West members at the Dalmeny Hotel in Lytham St Annes. The bacta President and other members of the bacta compliance team were in attendance. We presented about raising standards and had extensive discussions focused on customer interaction and money laundering. Of note we also had a presentation from Beacon Counselling (NW Gamcare provider)which dovetailed our discussions around customer interaction and outlined their work around prevention, education and treatment locally. Below is a list of operators in attendance. There were also some key staff members who are not identified below.

[redacted]

[redacted]

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

bacta
Delivering the Serious Business of Fun for 50 Years

From: [redacted]
Subject: RE: Premises Visit
Date: 07 March 2025 12:24:00

Great. Thanks [redacted]

See you then.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, March 7, 2025 12:23 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Premises Visit

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[redacted]

They have moved but still in the shopping centre... 11am should be fine...

Cheers

From: [redacted]@gamblingcommission.gov.uk>
Sent: 07 March 2025 12:22
To: [redacted]@bacta.org.uk>
Subject: RE: Premises Visit

Hi [redacted]

That works for me.

Shall we say 11AM at Cannock?

Are they still in the Cannock Shopping Centre?

Thanks.

[redacted]

[redacted]

From: [redacted]
To:
Subject: RE: Gambling Commission query
Date: 12 March 2025 09:13:00
Attachments: image001.png
image002.png

Hi [redacted]

11.00am is fine, I'll send you a meeting invite.

Kind regards

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, March 12, 2025 8:02 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Gambling Commission query

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

Hi [redacted]

I am well and I hope you are too.

[redacted]. Can we do 11.00am on Friday?

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
[redacted]

[redacted]

[redacted]

From: [redacted]
To: [redacted]@bacta.org.uk
Subject: RE: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot
Date: 18 March 2025 10:21:00
Attachments: image001.png
image002.png

Hi [redacted]

Sorry for the late email on this, could I check whether you received a response regarding this magazine interview?

Kind regards

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, February 12, 2025 9:34 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]
Subject: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot

You don't often get email from [redacted]bacta.org.uk. Learn why this is important

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

Hi [redacted]

We are looking forward to hosting you at the Bacta Social Responsibility Exchange on 26 March 2025 in Leeds. I am pleased to report that sign-ups to attend have been healthy.

We were wondering if you would be prepared to participate in a feature/interview in the trade magazine Coinslot to promote the event and help amplify your message.

Please find below a series of questions that have been supplied from Coinslot. The total number of words is 800. Deadline 18 March 2025.

I hope this might be possible. Let me know.

Best wishes.

[redacted]

1. Without giving too much away can you provide an overview of your address/speech at next week's SR Exchange – what are the key points?

2. The majority of Safer Gambling symposia/events focus on policy. So how important is it to have the Bacta SR Exchange which aims to deliver practical knowledge and insight which consumer-facing staff can take back into their venues and share with colleagues?

3. How would you assess the land-based sector's undertakings in respect of delivering effective player protection?

4. Dealing with specifics , where do you think land-based operators' need to raise their game?

5. Do you think Britain leads the way in balancing a healthy land-based industry with effective player protection – if not which country/jurisdiction provides the benchmark for best practice?

6. The Commission recently embarked on a programme of hosted site visits to licensed gambling businesses which has included Bacta member AGCs – how useful has this been?

7. Finally, can you provide an update on the Raising Standards Workshops – how have they progressed, have they been successful and how much of the focus has been on safer gambling/player protection?

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD

[redacted]

Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]
Subject: RE: Bacta SR Exchange
Date: 18 March 2025 15:25:00
Attachments: image002.png

Thanks [redacted]

That is all really useful. I'll come back to you ASAP with a details of who will be speaking. Totally makes sense re [redacted] too. I'll pick that up with him as well.

Thanks,

[redacted]

[redacted]

From: [redacted]
To: [redacted]
Subject: RE: BACTA/BGC/BA Technical Workshop - GMTS - Thursday 27 March 2025
Date: 20 March 2025 10:07:00

Will do [redacted] Can I politely decline the offer of lunch for the 3 of us. Noting, we are happy to share a cuppa and biscuit.

From: [redacted]@bacta.org.uk>
Sent: Thursday, March 20, 2025 10:07 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: BACTA/BGC/BA Technical Workshop - GMTS - Thursday 27 March 2025

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

Hi [redacted]

Could you forward to [redacted] – I don't have his email.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]
Sent: 20 March 2025 09:55
To: [redacted]@bacta.org.uk>
Subject: BACTA/BGC/BA Technical Workshop - GMTS - Thursday 27 March 2025

Dear Colleague

I am writing to confirm the arrangements to the workshop which is looking at the technical aspects of the GC GMTS review.

The details are as follows:

- Date: Thursday 27th March 2025

- Time: 11am to 2.30pm (approx)
- Venue: Blueprint Gaming Ltd, Blueprint House, Northern Road, Newark NG24 2EU
- Online: it will also be possible to join the meeting remotely – an appointment and Teams link will be sent
- Lunch: will be provided (please advise on any dietary requirements)
- Agenda: Introductions
    - Timelines
    - Set Limits/Staff Alerts
    - B3/B4 community games (implementing time & limits/staff alerts)
    - Electronic Bingo Terminals
    - Display of net position and session time
    - Venue Data Collection Systems and related protocols (SAS, BACTA, GBG)
    - AOB
- GC Attendees: [redacted]
- Industry Attendees
    - [redacted]

Let me know if you have any questions.

Kind regards.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity
Date: 25 March 2025 10:41:00
Attachments: image001.png
image002.png

Wonderful, thanks [redacted]

[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 25, 2025 9:34 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

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

Hi [redacted]

We'd be delighted to host a visit.

I'll get back with a proposal asap.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]gamblingcommission.gov.uk>

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Southport Visit - 28 April 2025 - GMTS
Date: 25 March 2025 16:09:00

Sounds like a plan, thanks everyone. [redacted] so I do have some flex in terms of when we finish – accepting that others may have decent journey times home…

From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 25, 2025 10:09 AM
To: [redacted]gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org; [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Southport Visit - 28 April 2025 - GMTS

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

Hi [redacted]

See below the draft itinerary for the visit to Southport on **Monday 28 April 2025** including visits to arcades and a sports and social club.

If time permits, we may be able to visit other arcades in the locality.

Best wishes.

[redacted]

-

SOUTHPORT VISIT – 28 APRIL 2025

12 noon

Meet at Pier Forecourt, Promenade, Southport PR8 1QX

Followed by visits to:

Silcocks Funland & Pier ([redacted])
Pier Forecourt
Promenade
Southport
PR8 1QX

Silcocks Casino
40 Neville St
Southport
PR9 0BX

2pm (approx)

Fleetwood and Hesketh Sports and Social Club
Fylde Road
Marshside
Southport
Merseyside
PR9 9XH

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]
To: [redacted]@bacta.org.uk
Subject: Letter from [redacted], Gambling Commission: Gambling promotions to be safer and simpler
Date: 26 March 2025 12:10:00
Attachments: 26.03.2025 - [redacted] letter to [redacted] BACTA.pdf
image001.png
image002.png

Dear [redacted]

On behalf of [redacted], the attached letter provides an update on measures to make gambling promotions safer and simpler.

Kind regards,

GAMBLING COMMISSION
[redacted]
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Hi [redacted]

Thanks for getting back to me.

I will send an invite for 12.00 on Monday if that works for you.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 28 March 2025 04:49
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Introduction to [redacted]nd new Bacta role

Hi there both, either Monday or Wednesday pm are good for me if that works ?
Best [redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, March 27, 2025 4:15 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Introduction to [redacted] and new Bacta role

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

Hi [redacted]

I hope you are well.

Are you available for a quick teams call on Monday or Wednesday next week.

I would like to introduce you to [redacted] (I know you have met [redacted] before).
Who is taking on a new role in Bacta [redacted]

We discussed AV testing on our last call, and this is one of the areas that [redacted] will be dealing with going forward.

Best wishes

[redacted]

[redacted]

[redacted]

From: [redacted]
To:
Cc:
Subject: Operator Engagement Forum
Date: 31 March 2025 11:38:48
Attachments: image.png
Outlook-n4psifn4

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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[redacted]

As below myself and [redacted] from Bacta will be attending the Operator Engagement Forum at the Oval cricket ground on Wed 2/4/25.

I have not received an agenda or confirmation that I will be attending. I understand it is a 9.30am start until 4.30pm....

Cheers [redacted]

From: [redacted]
Sent: Tuesday, March 4, 2025 10:37:09 AM
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Re: Attendance at Operators Engagement Forum

Thanks both. Who would [redacted] be attending in place of and are you aware of any dietary/accessibility requirements he may have?

Thanks,
[redacted]

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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[redacted]

From: [redacted]
To:
Subject: Operators Forum
Date: 31 March 2025 11:37:18
Attachments: image001.png

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

Hello [redacted]

Could you possibly send me an agenda for Wednesdays meeting, with start time?

Many thanks

[redacted]

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From: [redacted]
To: [redacted]
Subject: Re: Confirmation: Operators Engagement Forum - 2 April 2025
Date: 01 April 2025 15:34:05
Attachments: Outlook-Shape Des.png

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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

[redacted]

Thanks for this it means I can get there in good time….

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, April 1, 2025 3:27:41 PM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: Fw: Confirmation: Operators Engagement Forum - 2 April 2025

Hi both

[redacted] The email containing the requested information was sent on the 20th of March, it may have ended up in your junk. I have included the information below, hopefully you receive it this time.

Any other questions give me a shout.

Cheers,
[redacted]

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk
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[redacted]

[redacted]@gamblingcommission.onmicrosoft.com>
Sent: Thursday, March 20, 2025 5:02 PM
Subject: Confirmation: Operators Engagement Forum - 2 April 2025

image placeholder

We look forward to welcoming you to the Gambling Commission's Operators Engagement Forum.

Event Details:
Date: Wednesday, 2 April 2025
Time: 09:00 – 16:00
Location: Kia Oval, Kennington, London SE11 5SS

We are pleased to share the confirmed agenda for this, our second Operators Engagement Forum event, which is attached for your reference. Please take the time to familiarise yourself with the agenda and the sessions we have planned throughout the day.

This event is designed to foster collaboration and dialogue across the GB gambling industry and we are pleased to offer a day of insightful discussions, interactive sessions, and valuable opportunities to connect with peers and experts.

The event is now at full capacity and we have a waiting list of individuals wishing to attend. If you are no longer able to join us, please let us know as soon as possible so we can offer your place to someone else.

Please enter the venue through the Alec Stewart Gate. For further directions and travel information, please refer to the attached document. For accessibility guidance, please visit The Kia Oval website.

'Inside the Commission' podcast
You can now listen to the first episode of Inside the Commission, our new podcast, available now wherever you listen to your podcasts and on YouTube.

If you have any questions or need to make any changes to your attendance, please contact us at [redacted]@gamblingcommission.gov.uk.

We look forward to seeing you there.

From: [redacted]
To:
Cc:
Subject: RE: Raising Standards webinar?
Date: 04 April 2025 09:03:00

Hi [redacted]

At present we don't know what the format will be. We are looking at that at the moment and will update as soon as possible.
Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, April 3, 2025 5:30 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Raising Standards webinar?

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[redacted],

As you are aware bacta and our compliance team are continuing our work regarding raising standards and relevant messaging to our members. I noted previous comments that there was unlikely to be an online webinar for those operators who had been unable to attend any of the workshops. Do we know what the replacement or amended format will be and how this will be communicated.....

Cheers [redacted]

[redacted]@gamblingcommission.gov.uk>

Sent: 18 December 2024 15:47
Subject: Invitation to a free Gambling Commission compliance workshop - Arcade Sector

Dear Licensee

We recently wrote to you reminding you of your obligations around customer interaction and anti-money laundering. To support you to improve your understanding of the relevant Licence Conditions and Codes of Practice, we would like to invite you to a free workshop. Whilst attendance is not compulsory it will assist your understanding of the relevant topics.

We will be running four workshops on various dates and locations in February 2025. As spaces are limited spaces, and will be booked on a ‘first come, first served basis’ you are advised to book as soon as possible to avoid disappointment .

Please refer to the attached letter for details of where the workshops are being held and how to book.

Please also note, that whilst your response will be logged, due to the Christmas holidays it will be January 2025 before all spaces will be allocated. You will receive a further e-mail regarding this once the details have been finalised.

For those that are unable to make either the date or location of the workshops an online webinar will be broadcast in March 2025. Further details of this will be communicated in due course.

Kind Regards,

[redacted]

29-30 Ely Place

London

EC1N 6TD

[redacted]

www.bacta.org.uk

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: Re: Consultation responses.
Date: 04 June 2025 14:09:53
Attachments: image001.png
image002.png

Some people who received this message don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

I promise we'll do our very upmost to get the accompanying papers to you by COP Thursday. There is an outside chance we may slip to Friday though.

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Wednesday, June 4, 2025 9:31:09 AM
To: [redacted]@bacta.org.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Consultation responses.

Hi [redacted]

Thanks for confirming.

It would be appreciated if the additional documents are provided by COP Thursday please. We are prepared to start analysis next week and need to be in position on Friday to pull off all reports/documents… to allow us to start that process. Is COP Thursday ok?

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, June 3, 2025 5:49 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]bacta.org.uk>

Subject: RE: Consultation responses.

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Hi [redacted]

That's Bacta made its submission via the portal.

We will be sending the accompanying documents in the next day or so. They are just being finalised now. Hope that's ok.

Talk soon.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]gamblingcommission.gov.uk>
Sent: 03 June 2025 09:48
To: [redacted]@bacta.org.uk>; [redacted]@gamblingcommission.gov.uk>; [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]
Subject: RE: Consultation responses.

Thanks [redacted]

Could you CC my colleagues [redacted] and [redacted] into the email with additional documents so that we can ensure they are recorded as needed.

Thanks

[redacted]

[redacted] – I know there's a saying that covers off the next sentence but… [redacted]

[redacted] I look forward to continuing the positive engagement with you and BACTA in coming months.

From: [redacted]@bacta.org.uk>
Sent: Monday, June 2, 2025 6:02 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]
Subject: Re: Consultation responses.

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

Hi [redacted]

Understood. Our submission has been uploaded and saved and will be submitted tomorrow.

[redacted]

Best wishes.

[redacted]

[redacted]
[redacted]

From: [redacted]
To:
Subject: FW: Gambling Commission query
Date: 07 April 2025 12:06:00
Attachments: image001.png
image002.png

Hi [redacted]

Please would you let me know whether you have an update with progress on this matter.

Kind regards

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]
Sent: Monday, March 17, 2025 9:18 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission query

Hi [redacted]

That's fine, I'll send you a meeting invitation.

Kind regards

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Monday, March 17, 2025 8:48 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Gambling Commission query

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Hi [redacted]

Can we go for 1.00pm on Tuesday.

Many thanks

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 14 March 2025 16:51
To: [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission query

Hi [redacted]

Thank you for your time this morning, [redacted] would like to carry on the conversation next week, if you are free for a Teams call on Monday after 3pm or any time on Tuesday except between 9.30 and 10am, we can pick things up.

Kind regards

GAMBLING COMMISSION
[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Wednesday, March 12, 2025 8:02 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Gambling Commission query

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

Hi [redacted]

I am well and I hope you are too.

I am in Manchester today but will be in the office on Friday. Can we do 11.00am on Friday?

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 11 March 2025 15:12
To: [redacted]@bacta.org.uk>
Subject: Gambling Commission query

Hi [redacted]

Hope you're keeping well.

Would you have time this week for a chat please about a matter our Contact Centre has raised?

I'm free on Thursday afternoon and on Friday.

Kind regards

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

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From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: Re: SESOG - data reporting
Date: 07 April 2025 16:13:29
Attachments: image001.png
image002.png

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[redacted]

Good to see you in London last week. I have requested the data from our self-exclusion IT partner and you should get it in good time....

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, April 7, 2025 09:42
To: [redacted]@bacta.org.uk>
Subject: SESOG - data reporting

Morning [redacted]

Just a quick reminder that submissions will be due soon for the next sets of data reporting:

- Quarterly data for January to March 2025
- The annual return for 2024/25

The deadline for sending the data is 15 April.

Kind regards

GAMBLING COMMISSION
[redacted]
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From: [redacted]
To:
Subject: RE: B2C data request - feedback requested
Date: 10 April 2025 16:43:00
Attachments: image001.png
image002.png

Thanks for confirming [redacted]

[redacted]

[redacted]

From: [redacted]bacta.org.uk>
Sent: Thursday, April 10, 2025 4:30 PM
To: [redacted]gamblingcommission.gov.uk>
Subject: RE: B2C data request - feedback requested

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

[redacted]

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 10 April 2025 10:38
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: FW: B2C data request - feedback requested

Good morning

I hope you are well.

I just wanted to check if you had any feedback in relation to the below request that you

wanted to share. If you do, I really need it by COP today please. If you don't have any comment, a nil response would be appreciated.

Cheers

[redacted]

From: [redacted]
Sent: Tuesday, April 1, 2025 11:05 AM
[redacted]@bacta.org.uk>; [redacted]
[redacted]@gamblingcommission.gov.uk>
Subject: B2C data request - feedback requested

Hi everyone

I hope you are all well.

Delays in receiving the B2B responses (which were needed to support this request) has meant we aren't going to hit the targeted date for sending out of 9 April 2025. We are therefore working towards the 16 April 2025, running for 6 weeks, giving a deadline for completion of Tues 27 May 2025. This is one week after closure of the consultation but we are ok with that in terms of this request.

We have tried to keep the request simple – in essence asking for a stock-take of the number and type of gaming machines that you currently make available for use in your licensed premises. We consider we can use the B2B and B2C responses together to calculate an estimation of the number of Category B gaming machines that, under the changes proposed, would have to be removed as they couldn't be updated to comply. We have used pre-population/data validation where we can – as we feel this will aid completion and subsequent analyse. Free text options are also provided as a means of recording some of the older manufacturer/machine names.

I was hoping to secure some fairly timely feedback (**by COP Wed 9 April**) from a **very small** sample of licensees/members – perhaps 1 or 2 from each sector, no more please. We are broadly comfortable with what we have pr[redacted] but appreciate that a little road-testing could help fin tune things.

I suggest those asked to help digest the document in the following order…

- Draft text to support…
- Guidance Note
- The excel workbook

Those helping can have a go at completing the excel workbook if they want to – or just play around a little to see if the functionality works ok and they are comfortable in terms of what they would have to do. They would still be subject to the actual request in due course.

Happy to take the feedback if any form – it can be as rough and ready as it needs to be.

I hope the above makes sense. Happy to speak if it would help.

Cheers

GAMBLING COMMISSION

[redacted]

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Guidance notes - licensee stock-take of Category B gaming machines

Scope

- This request relates to GMTS proposals 15.1 (Limit setting), 15.2 (Safer gambling messaging) and 15.3 (Display of net position and elapsed time) as these include existing gaming machines/ games within scope.
- GMTS proposals 15.4 (Awards below the stake size) and 15.5 (Prohibiting features that permit a customer to reduce the time until the result is known) are NOT relevant to this exercise - as these proposals do not include existing gaming machines/ games within scope.
- Our request is limited to all Cat B sub-categories as these are the focus of GMTS proposals 15.1, 15.2 and 15.3. We are NOT collecting data with regards to Cat C and/or D gaming machines.

Completion of the Excel workbook

When saving the excel document (for subsequent return) it would be really helpful if you could use the prefix of your account number with the title.

Row 2 – enter the date you completed the exercise.

Row 3 – enter your Account (Licence) Number – details can be found on your licence and/or via https://www.gamblingcommission.gov.uk/public-register/businesses.

Row 4 – enter your Account (Licence) Name – details can be found on your licence and/or via https://www.gamblingcommission.gov.uk/public-register/businesses.

You are invited to make block entries when the relevant details are consistent across **all** columns (A to G). In short, if any detail is different, a separate entry should be made on a new row. Please make entries by moving from left to right across the columns on each row entry.

Column A – Click the cell and use the downward arrow to the right of the cell to select the relevant ***Premises type*** from the pre-populated options. This column recognises that some licensees may make gaming machines available for use in different types of premises.

Column B – Click the cell marked **Select** and use the downward arrow to the right of the cell to select the relevant ***Gaming Machine manufacturer*** name from the pre-populated options. The pre-populated options were generated using information provided during the recent B2B data requests. We appreciate that many ***Gaming Machine manufacturer*** names are not included on the pre-populated options. Where that is the case, please select 'Other' from the pre-populated list and then document the relevant ***Gaming Machine manufacturer*** name using free text in **Column D.**

Column C – Click the cell marked (blank) and use the downward arrow to the right of the cell to select the relevant ***Gaming Machine name*** from the pre-populated options – the options will link back to the ***Gaming Machine manufacturer*** name entered in the previous cell/column. The pre-populated options were generated using information provided during the recent B2B data requests. We appreciate that many ***Gaming Machine names*** are not included on the pre-populated options. Where that is the case, please select 'Other' from the pre-populated list and then document the relevant ***Gaming Machine name*** using free text in **Column E.** ***Gaming Machine name*** aims to capture the most relevant identifier for a cabinet

or platform that offers multiple games on a single gaming machine or the name of the game title where a single game is offered on a gaming machine.

Column D - we appreciate that many ***Gaming Machine manufacturer*** names are not included on the pre-populated options within Column B. Where that is the case, please use this column to document other **Gaming Machine manufacturer** names using free text.

Column E - we appreciate that many ***Gaming Machine names*** are not included on the pre-populated options within Column C. Where that is the case, please use this column to document other ***Gaming Machine names*** using free text. ***Gaming Machine name*** aims to capture the most relevant identifier for a cabinet or platform that offers multiple games on a single gaming machine or the name of the game title where a single game is offered on a gaming machine.

Note re Columns B to E. The ***Gaming Machine manufacturer*** name should be available on the machine's identification plate – where you may also find the ***Gaming Machine*** **name.** Alternatively, you could contact your machine supplier/manufacturer for support in identifying machines.

Column F - Click the cell and use the downward arrow to the right of the cell to select the relevant ***Machine Category*** from the pre-populated options. For gaming machines that offer multiple games, please record the machine category based upon the highest category of game available on the machine.

Column G - use free text to enter the ***Number of those machines available for use.***

Column H – use this column to record any supporting comment which may inform the Commission's understanding of the entry made.

An illustrative **example of a completed workbook** can be found on the excel document that you will use to make your submission.

From: [redacted]
[redacted]
Date: RE: SESOG - data reporting
14 April 2025 09:52:00
Attachments: image001.png
image002.png

Hi [redacted]

I confirm receipt of the SESOG data sets.

Kind regards

GAMBLING COMMISSION
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[redacted]@bacta.org.uk>
Sent: Friday, April 11, 2025 6:18 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Re: SESOG - data reporting

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[redacted]

I attach both sets of data for your info....

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Monday, April 7, 2025 09:42
To: [redacted]@bacta.org.uk>
Subject: SESOG - data reporting

Morning [redacted]

Just a quick reminder that submissions will be due soon for the next sets of data reporting:

Quarterly data for January to March 2025

- The annual return for 2024/25

The deadline for sending the data is 15 April.

Kind regards

[redacted]
[redacted]
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From: [redacted]
Subject: RE: Non-remote licensee category B gaming machine data request
Date: 16 April 2025 16:04:00

Thank you!

From: [redacted]@bacta.org.uk>
Sent: Wednesday, April 16, 2025 3:15 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Non-remote licensee category B gaming machine data request

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Thanks [redacted]

We'll certainly encourage members to respond.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 16 April 2025 14:47
To: [redacted]@bacta.org.uk>; [redacted]
Subject: Non-remote licensee category B gaming machine data request

Hi everyone

We have sent out the B2C category B gaming machine data request today. An example email is provided below – along with the attachments licensees will have received.

Any help in encouraging members to respond will be greatly appreciated – noting we have explicitly stated that this request is made in reliance of our formal powers under licence condition 15.3.1.

Licensees are required to complete and return the attached excel document to us by the

end of Tuesday 27 May 2025.

Kind regards

[redacted]

From: Statistics Queries
Sent: Wednesday, April 16, 2025 1:10 PM
To:
Subject: Non-remote licensee category B gaming machine data request

Hello

This message is sent to you as the named primary contact for;

Account ID – XX *(ID redacted)*

Account Name – XX *(Name redacted)*

We recently launched our consultation on gaming machines. During the consultation, we want to gather evidence that will assist us in measuring both the likely regulatory impacts of the proposed changes and the likely costs of implementing them. This evidence will be invaluable to helping make a robust assessment on whether the benefits to consumers are proportionate to the costs involved.

As part of our evidence gathering, we will be making 3 separate data requests of licensees which will focus on:

1. Gaming machine sessional and voluntary limit setting functionality – a B2B request
2. Machines at risk and commercial arrangements offered – a B2B request
3. Non-remote licensee category B gaming machine stock-take – a B2C request.

These requests are in addition to a licensee's ability to respond to the questions posed within the consultation document.

We have recently completed the two B2B requests.

This email relates to the B2C request. It requires you to record the number and type (by **Gaming Machine manufacturer** name and **Gaming Machine name)** of Category B gaming machines you make available for use in reliance of your licence. This information will inform our estimation of the number of Category B gaming machines that, under the changes proposed, would have to be removed as they could not be updated to comply.

As we move forward during the consultation process, we know that the gaming machine landscape will change. For example, the number of gaming machines 'available for use' may increase or decrease by machine category and/or sector, B2C licensees may choose to update their machine estates for their own commercial reasons and B2B licensees may determine that a particular gaming machine/ game will no longer be supported in terms of updates/ repairs (sometimes referred to as 'end of life'). Given the above uncertainties, this request aims to generate a snapshot in time - based upon the current market.

The request has been sent to holders of non-remote AGC, betting, bingo and casino licences and is made in reliance of our formal powers under licence condition 15.3.1.

It is noted that whilst the primary purpose of this request is to inform the Commission's live consultation, the data provided may additionally be used in connection with our wider policy activity and our role as advisor to Government (for example, in connection with the other gaming machine related Gambling Act Review proposals).

You are required to complete and return the attached excel document to us by the end

of **Tuesday 27 May 2025.** A ‘nil response’ is required from those not currently making any Category B gaming machines available for use in reliance of their licence.

Please take time to read the attached ‘Guidance Note’ which provides further detail on how to complete the workbook. The workbook also contains an illustrative example of what a completed workbook should look like.

All the data provided will be dealt with in compliance with our data protection requirements. We may share data with DCMS/Government in line with our role as advisor. Any data shared or published will be in an anonymised and/or aggregated basis.

Thank you in advance for your co-operation.

Please return your completed document to statistics@gamblingcommission.gov.uk and [redacted]@gamblingcommission.gov.uk.

If you have any questions, please email [redacted]@gamblingcommission.gov.uk.

Thanks

[redacted]

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From: [redacted]
To:
Subject: RE: Premises Visit
Date: 16 April 2025 13:43:00

Got it, thanks!

See you tomorrow.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, April 16, 2025 1:28 PM
To: [redacted]gamblingcommission.gov.uk>
Subject: RE: Premises Visit

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[redacted]

Fine by me see you there....

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 16 April 2025 12:46
To: [redacted]@bacta.org.uk>
Subject: RE: Premises Visit

Hi [redacted]

Just confirming regarding tomorrow.

See you there, Cannock Shopping Centre at about 10.45?

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, March 7, 2025 12:23 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Premises Visit

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[redacted]

They have moved but still in the shopping centre... 11am should be fine...

Cheers

From: [redacted]@gamblingcommission.gov.uk>
Sent: 07 March 2025 12:22
To: [redacted]@bacta.org.uk>
Subject: RE: Premises Visit

Hi [redacted]

That works for me.

Shall we say 11AM at Cannock?

Are they still in the Cannock Shopping Centre?

Thanks.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, March 7, 2025 11:35 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Premises Visit

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[redacted]

How about just 17th April... I have just noted that 18th is Good Friday...

Cheers

From: [redacted]
Sent: 07 March 2025 11:34
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Premises Visit

[redacted]

The operator who is willing to assist is [redacted]. With my commitments and his can we offer you 17th or 18th April to visit Cannock...

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 07 March 2025 09:38
To: [redacted]@bacta.org.uk>
Subject: RE: Premises Visit

Thanks [redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, March 7, 2025 9:37 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Premises Visit

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[redacted]
I will get in touch with the operator and let you know....

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Thursday, March 6, 2025 1:13:14 PM
To: [redacted]@bacta.org.uk>
Subject: Premises Visit

Hi [redacted]

Do you have any suggested dates for the above?

If you can suggest a few I'll see what I'm up to.

From: [redacted]
To:
Subject: RE: Follow Up
Date: 17 April 2025 15:56:00
Attachments: image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
image012.png

Hi [redacted]

Just to let you know, I don't have concrete answers to your queries [redacted]

What I can say is that the format of sweep-ups for those who were unable to attend the workshops is still being considered. As for the RET payments, I've been told that our Policy dept. have not yet released guidance details on payment etc. So it's basically a case of watch this space for both issues, which I appreciate isn't a lot of help.

Hope you have a nice Easter!

Kind regards
[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Monday, April 14, 2025 4:10 PM
[redacted]@gamblingcommission.gov.uk>
Subject: Follow Up

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Hi [redacted]
Thank you again for joint visit last week - both [redacted] and I found it very useful. As requested, would it be possible to chase up the importance of a webinar for the

members who were unable to attend the workshops, ands confirmation as to what members should do with regards to the RET payment when due to pay it now. Many thanks!

Kindest regards

[redacted]

29-30 Ely Place

London

EC1N 6TD

[redacted]

[redacted]

Web: www.bacta.org.uk

Don’t forget to follow bacta and tickets2wishes on social media - Support #Tickets2Wishes to help Rays of Sunshine grant wishes to children with terminal or life-limiting conditions

@bactauk @tickets2wishes

From: [redacted]@bacta.org.uk; [redacted]@bacta.org.uk; [redacted]@bacta.org.uk
Subject: Assurance Statement cycle 2025
Date: 22 April 2025 13:23:51
Attachments: Outlook-Shape__Des.png
Outlook-sarc4f13.png
April 2025 Annual Assurance Statement Templates .doc

Dear, [redacted]

Thank you for providing the feedback on behalf of your members in scope for this years process. We have considered the information which has been provided and are now pleased to share with you the final versions (attached) which will be used for this year's submission.

The feedback highlighted an issue some operators may experience which related to the entire board signing off the Assurance Statement. Within this year's submission, in the free text provided within the template, we will expect operators to outline how their board has received assurances from the business in the areas highlighted in the template. However, in terms of who we would expect to sign the Assurance Statement for submission, this would be the Chair of the board and CEO/Managing Director. These positions should hold a Personal Management Licence, in line with paragraph 2 a and b of Licence Condition 1.2.1 - Specified management offices. Other members of the board are able sign the submission if they wish.

Additionally, to clarify there is no issue if operators do select 'yes' against any of the statements. We are not looking for evidence at this stage. We have also amended the submission date for all operators to 31 July 2025.

If you require further clarification on the statement, then please contact [redacted] at [redacted]@gamblingcommission.gov.uk."

Kind Regards
[redacted]

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From: [redacted]
To:
Subject: Re: Prize Games Reg returns
Date: 23 April 2025 12:26:19
Attachments: image003.png
Outlook-hv2onr45
Outlook-dimz1w4x.png

Fortunately relatively straight forward :

Gross sales are the sale of tickets to do the prize gaming and the par fee is the % of that if any that they keep.

If they give all monies for gross sales back as prizes etc then Par fee is £0.

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From: [redacted]@bacta.org.uk>
Sent: 23 April 2025 11:53
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Prize Games Reg returns

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[redacted]

Thanks for this. Can you help out with gross sales and participation fees as well please the link does not help...

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 23 April 2025 09:16
To: [redacted]@bacta.org.uk>
Subject: Re: Prize Games Reg returns

Good Morning,
Yes I do recall the conversation - hope you and the guys are all doing well.
Prize gaming is explained a little better here Bingo at a premises: prize gaming and relates

to prize bingo.
I am sure we discussed whether Cat D machines that paid out in prizes as opposed to cash were covered under prize gaming but can confirm that we would expect that to be covered under the cat D (or relevant category return)

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Great Place To Work. Certified NOV 2024-NOV 2025 UK

From: [redacted]
Sent: Tuesday, April 22, 2025 17:11
To: [redacted]
Subject: Prize Games Reg returns

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[redacted]

I appreciate this is some time ago. You may recall myself and my colleagues received regulatory return training in September last year. We raised a query on the day. Could you clarify what exactly constitutes a Prize Game and what does it mean in terms of total gross sales and participation fees…… You indicated that you may be moving on from reg returns work who is the best person to contact if not yourself…..

Cheers [redacted]

[redacted]

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[redacted]
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GAMBLING COMMISSION

[redacted] Cookie preferences Privacy statement

Regulatory Returns

Adult Gaming Centre | Return period 01 January 2025 to 31 March 2025

Hub
Operational Information
Financial information
Summary

Prize Games

Detailed guidance on this section of the return can be found on the Gambling Commission website. https://www.gamblingcommission.gov.uk/guidance/regulatory-returns-guidance/rr-guidance-adult-gaming-centre-financial-information

Category	Total gross sales	Total participation fees
Prize games	£	£
Total	£	£

Save

Good morning

Thanks for facilitating yesterday's visits and engagement – I always find these days challenging (in a good way), informative and enjoyable.

I did want to quickly circle back to you on our 'available for use' guidance - When gaming machines are available to use - 20% regulations and Guidance:When a machine is available for use

The first page/link was published in 2019 off the back of in-fills and other space saving designs. You will read the specific reference to how we consider they (in-fills) can be counted for machine entitlement purposes.

…For example, narrow/in-fill single player gaming machines designed to fit in between full-sized gaming machines have become two-player and more recently four-player machines.

Both variants were within the same size cabinet as the original single player machine, which had a width of approximately 10 inches. Such two and four-player machines are not actually available for use in any practical way by more than one player at a time. For example, they cannot be played simultaneously by more than one person.

Such narrow/in-fill machines, ***subject to appropriate spacing*** *(emphasis added), can only be considered to be one gaming machine for the purpose of calculating the number of machines 'available for use'.*

I appreciate that the licensee advised they had sufficient wriggle-room in the premises to ensure compliance was maintained – but that felt partly by chance given that they stated they were duo-pots and therefore counted them as two machines per single cabinet.

Whilst I certainly consider this NFA from me, you might consider what, if any, comms you want to do with members to remind them of our guidance in this area.

Thanks

GAMBLING COMMISSION
[redacted]
[redacted]uk
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Great Place To Work. Certified NOV 2023-NOV 2024 UK

From: [redacted]
To:
Subject: Re: GC Assessments
Date: 09 May 2025 09:43:38

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[redacted]
Just what I thought. Thankyou for the swift reply….

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, May 9, 2025 9:39:54 AM
To: [redacted]@bacta.org.uk>
Subject: RE: GC Assessments

Hi [redacted]

To answer your points:-

1. Th majority have been reassessed (sometimes this just involves sending us updated policies etc and no visit is undertaken but sometimes visits are made) I think [redacted] has a couple outstanding and that's it.
2. As the majority of visits are to smaller operators, it is likely that they will be unannounced premises visits where policies etc can be viewed or requested later. Obviously if policies are requested first, the operator will know a visit is coming and will usually be told so. Generally, as you know, larger operators have longer policy documents which is why we often request them first.

Obviously not all will be Bacta members so you won't get to know about all the visits.

Hope this assists.

Regards.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, May 8, 2025 5:04 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: GC Assessments

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[redacted]

Thanks for taking my call today and updating me on the roadmap for the assessment process. Just a couple of further points if you can help me…

1. I think you indicated that a few assessments had taken place and a number had been subject of an improvement notice. Have these venues been reassessed and are the majority back on track or haven't you finished the work yet.
2. Also when you carry out visits in May – July are you likely to visit head offices if possible or could it be a bit random. I appreciate our discussion about 4 in a day etc….

Cheers [redacted]

[redacted]

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EC1N 6TD
[redacted]
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Delivering the Serious Business of Fun for 50 Years

From: [redacted]
To:
Subject: RE: Age Verification - Virtual meeting
Date: 16 May 2025 15:29:00

Hi, is 10.00 am ok? [redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, May 16, 2025 1:19 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Age Verification - Virtual meeting
Importance: High

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

Dear [redacted]

Many thanks for your email.

I am pleased to meet you, my name is [redacted] I am [redacted].

I am monitoring [redacted] emails today and replying on his behalf as [redacted] is attending a training. I informed him of your email, and [redacted]

Can you please do next week, Monday 19th May, at 10am? Today is unfortunately an extremely busy day for [redacted]

Waiting for your kind reply, I wish you a good afternoon.

Kind regards,

[redacted]

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London EC1N 6TD

Main Line: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>

Sent: 16 May 2025 11:45
To: [redacted]bacta.org.uk>
Subject: RE: Age Verification - Virtual meeting

Hi [redacted] – my apologies for missing this. I [redacted]. Are you free later today? [redacted]

-----Original Appointment-----
From: [redacted]@bacta.org.uk>
Sent: Wednesday, November 27, 2024 10:36 AM
To: [redacted]
Subject: Age Verification - Virtual meeting
When: 16 May 2025 10:00-11:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
Where: Microsoft Teams Meeting

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Dear [redacted] and [redacted]

Hope you are well.

I am inviting you to the **Age Verification** virtual meeting of the to be held on:

Date – Friday, 16 May 2025
Time – From 10am to 11am
Venue – Virtual on Teams (link further below)

Another similar invite, for another virtual meeting to be held 6 months after this one here, will soon follow.

Thank you and I wish you a good day.

Kind regards

[redacted]
[redacted]

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London EC1N 6TD

Main Line: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: B2C Data request reminder
Date: 20 May 2025 13:40:00
Attachments: image002.png

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Hi [redacted]

Many thanks.

By co-incidence we have a Bacta all-members' webinar on the review of technical standards tomorrow.

We will emphasise the need for them to respond.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]@bacta.org.uk | Web: www.bacta.org.uk

Outlook

Re: Apologies I need to postpone today's meeting

From [redacted]@gamblingcommission.gov.uk>
Date Fri 5/23/2025 10:23 AM
To [redacted]@bacta.org.uk>

Yep, of course. I was just checking that 11:30 wasn't better for you. Look forward to catching up at 12.

Kind regards

[redacted]

From: [redacted]bacta.org.uk>
Sent: Friday, May 23, 2025 10:15
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Apologies I need to postpone today's meeting

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

Hi [redacted]

Thanks for the update, can we stick with the original slot?

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 23 May 2025 10:12
To: [redacted]@bacta.org.uk>
Subject: Re: Apologies I need to postpone today's meeting

Morning [redacted]

The meeting I had from 11-12 this morning has now been postponed. So I could move our catch up to 11:30 if that is still a better time for you (I can still do the current scheduled time too) ?

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, May 20, 2025 10:02
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Apologies I need to postpone today's meeting

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

Hi [redacted]

No problem. I hope you are okay. I have meetings tomorrow and Thursday. 11.30am on Friday would work for me if you are free.

Best wishes

[redacted]

Sent from my iPhone

> On 20 May 2025, at 09:29, [redacted] <[redacted]@gamblingcommission.gov.uk> wrote:
>
> Morning [redacted]
>
> With sincerely apologies for the late notice, I'm not going to be able to meet today [redacted]. Can we rearrange to later in the week please (probably on Teams)
>
> Sorry [redacted]
>
> Kind regards
>
> [redacted]
>
> [redacted]
>
> Victoria Square House
> Victoria Square
> Birmingham
> B2 4TP
>
> Mob [redacted]
>
> This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please clearly state that your request is under the Freedom of Information Act.

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Hello [redacted]

Re: [redacted]

I am the Bacta Membership Support Officer for the Southeast. We may have met at the Bacta show? The above are my members.

I have spoken with [redacted] in relation to the MOSES system/ Bacta Portal. I believe there may have been some confusion as to access to the MOSES system. [redacted] (The company) are long-standing Bacta members and are registered for the Bacta Portal, giving them full access to Self-Exclusion. I am assuming that as both AGCs were practically next to each other, [redacted] were using the one Portal log-in for both AGC's?

Would it be possible for me to give you a call to discuss at some stage? Would you be able to forward a number where I can contact you?

Many thanks

[redacted]
London and South East
Mob: [redacted]

bacta
Empowering the UK's amusement machine industry

Dear [redacted] and [redacted]

Thank you both so much for hosting me and my fellow Commissioners earlier this week. We found the visit incredibly useful. It was great to be hosted at an AGC and get a flavour of your site. It was really helpful to talk through the operation and the controls that you have in place. The conversations we had about AGCs, and how the industry/BACTA sees the regulatory environment was very illuminating. We look forward to BACTA's imminent response to our consultation on technical standards.

Thank you for your time and for the time of all those involved in the visit and preparing for the visit. May I ask you to pass on my thanks to everyone involved.

Best wishes
[redacted]

Limit Setting Standard

v.5.0 (01/22)

Voluntary Alerts

Overview and Current Configuration

- In addition to mandatory alerts, players may choose to set a voluntary limit for either time or deposit
- When a voluntary limit is exceeded, play is paused and a message is displayed to the player.
- When a player exceeds a limit, the player may choose from the following options
  - Collect Cash – this ends the session immediately and the player collects any outstanding credit
  - Continue with Defaults – this will allow the player to continue the session with no voluntary limits set, relying on the mandatory alerts.
    - In this case, there will be a cooling-off period of 30 seconds
  - Set Your Limits – this will allow the player to set revised limits
    - In this case, there will be a cooling-off period of 30 seconds
- The player may modify their voluntary limits at any time using the "Set Limits" button on the menu
  - In the case of a player modifying existing limits, there will be a cooling-off period of up to 30 seconds

Voluntary Limits

First pop-up when the session is started.

- By pressing **NO** the pop-up will disappear and mandatory alerts will apply.
- When **YES** button is pressed a Set Limits pop-up will appear so a player can set custom limits.

Custom Limits pop-up

Voluntary Limits - Time Limit Set

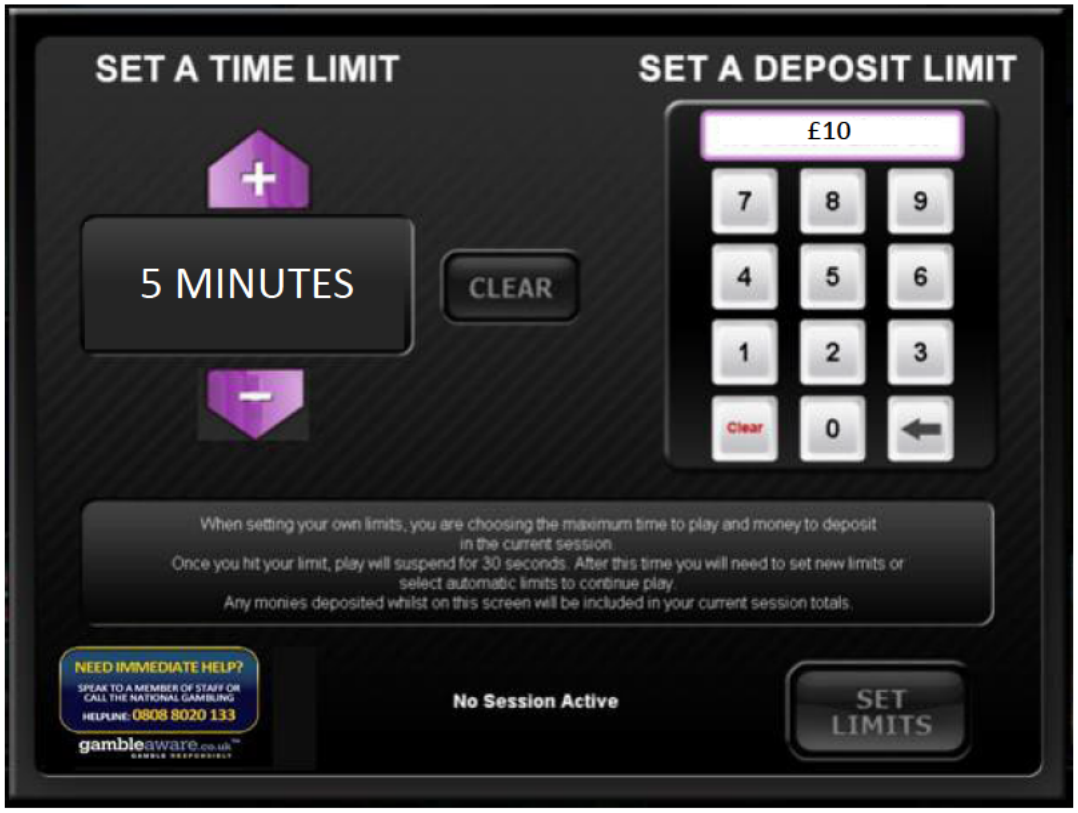
Custom Limits pop-up

Voluntary Limits – Spend Limit Set

Custom Limits pop-up

Voluntary Limits – Both Time & Spend Limits set

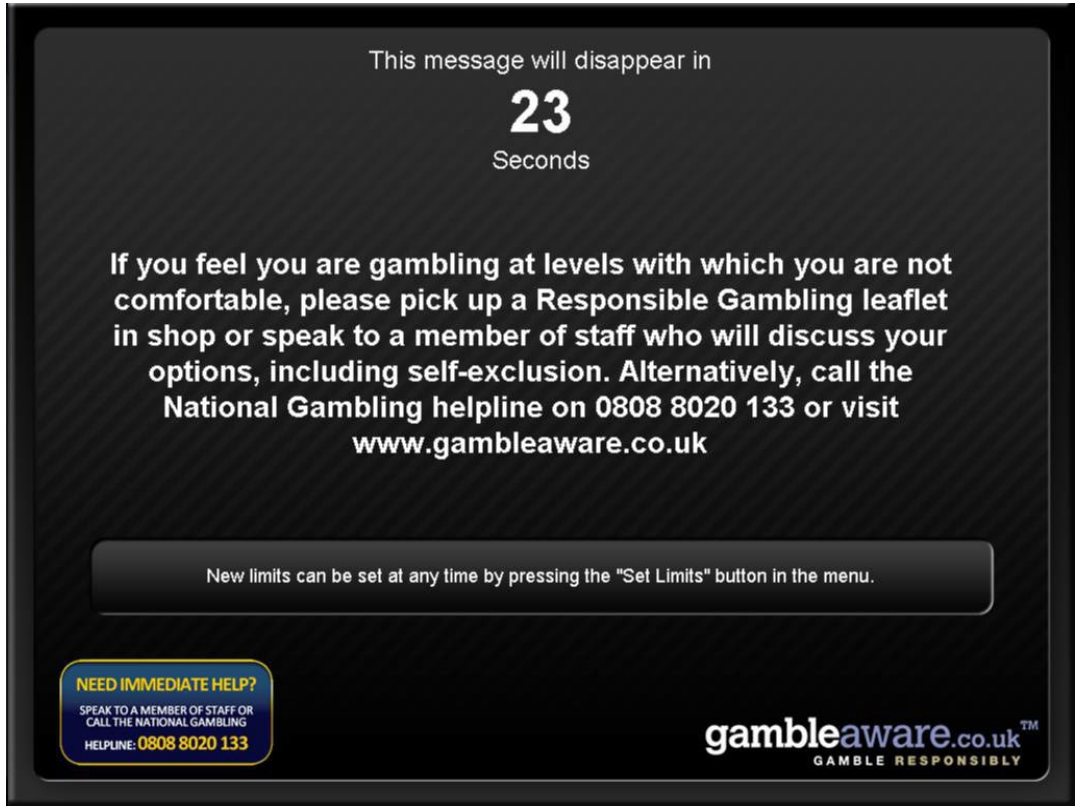
Custom Limits pop-up



Voluntary Limits – Limits Cleared

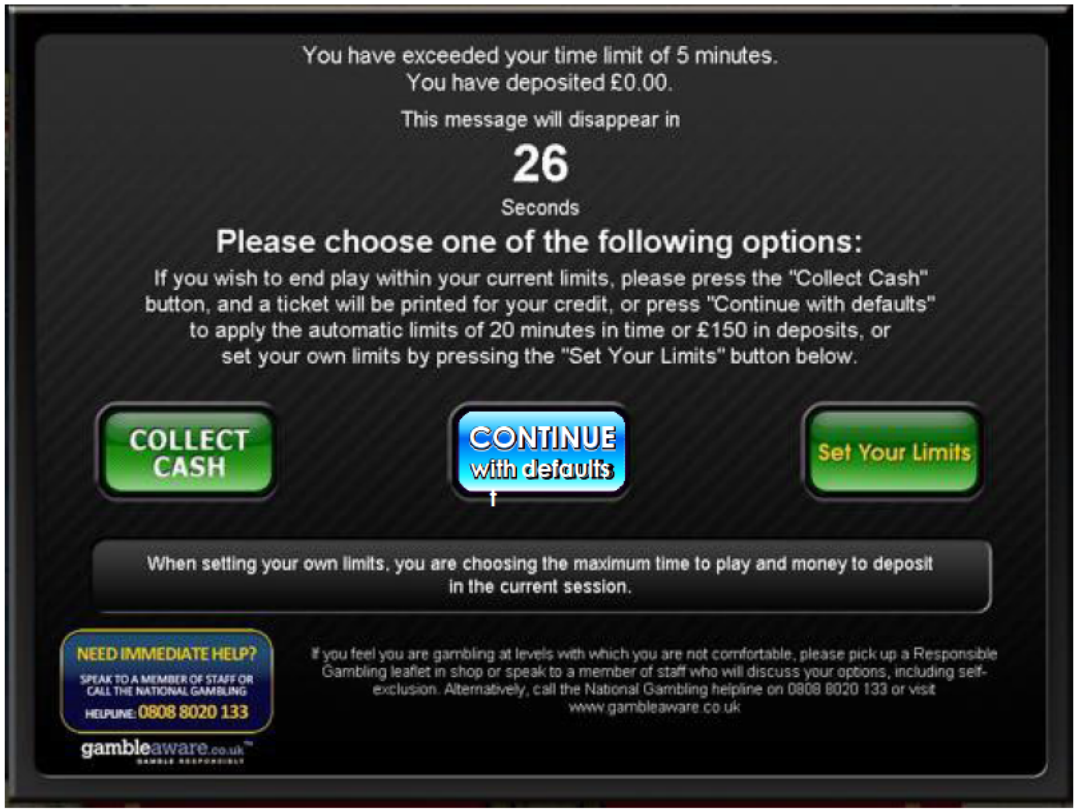
The below appears when a player decides to clear limits in an active session

Cool-off period pop-up



Voluntary Limits – Time Limit Exceeded – CollectCash

Time Limit exceeded pop-up



Voluntary Limits – Time Limit Exceeded – Continue With Defaults

Cool-off period pop-up

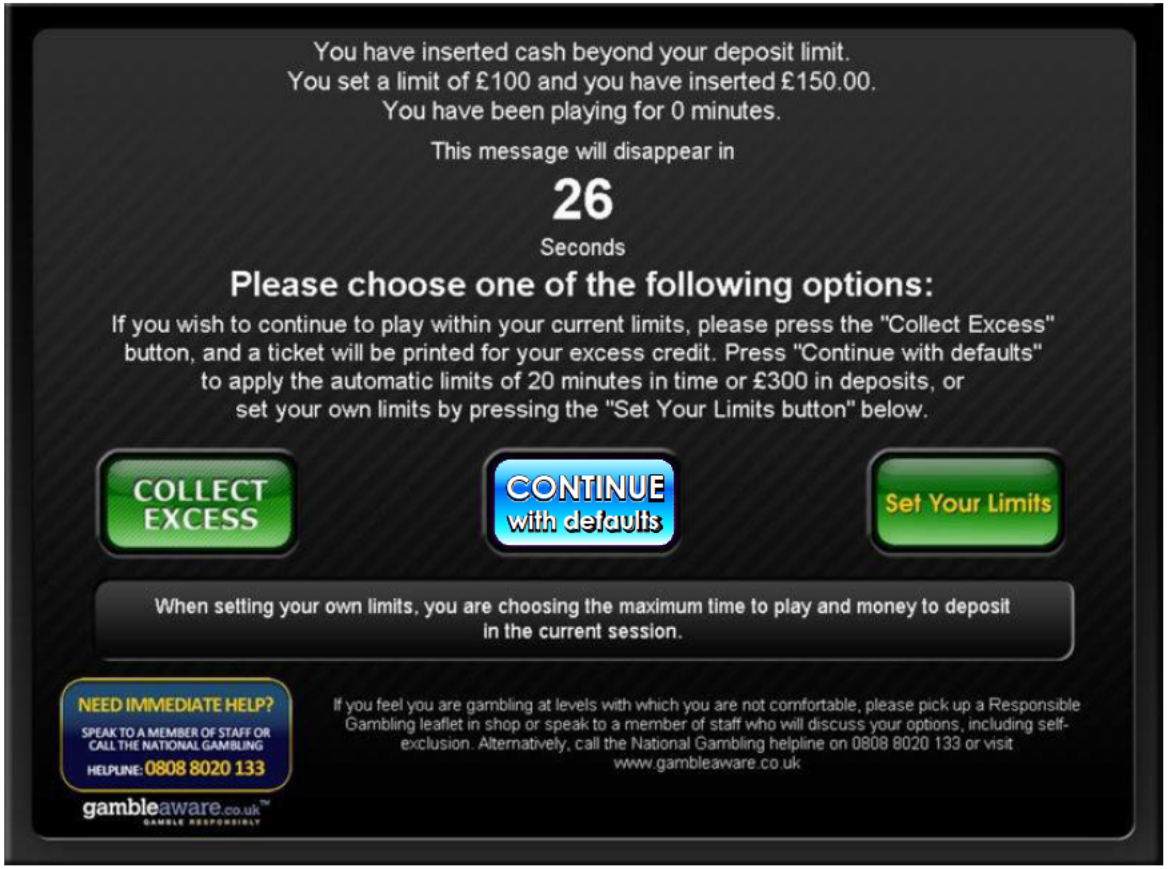
Voluntary Limits – Time Limit Exceeded – Set Your Limits

When player has pressed **Set Your Limits** from the Exceeded pop - up the below cool-off period pop-up will be shown to the player .

Cool-off period pop-up

Voluntary Limits – Spend Limit Exceeded – Collect Excess

Spend Limit Exceeded pop-up



Voluntary Limits – Spend Limit Exceeded – Continue With Defaults

Cool-off period pop-up

Voluntary Limits – Spend Limit Exceeded – Set Your Limits

When player has pressed **Set Your Limits** from the Exceeded pop-up the below cool-off period pop-up will be shown to the player.

Cool-off period pop-up

Mandatory Alerts

Overview and Current Configuration

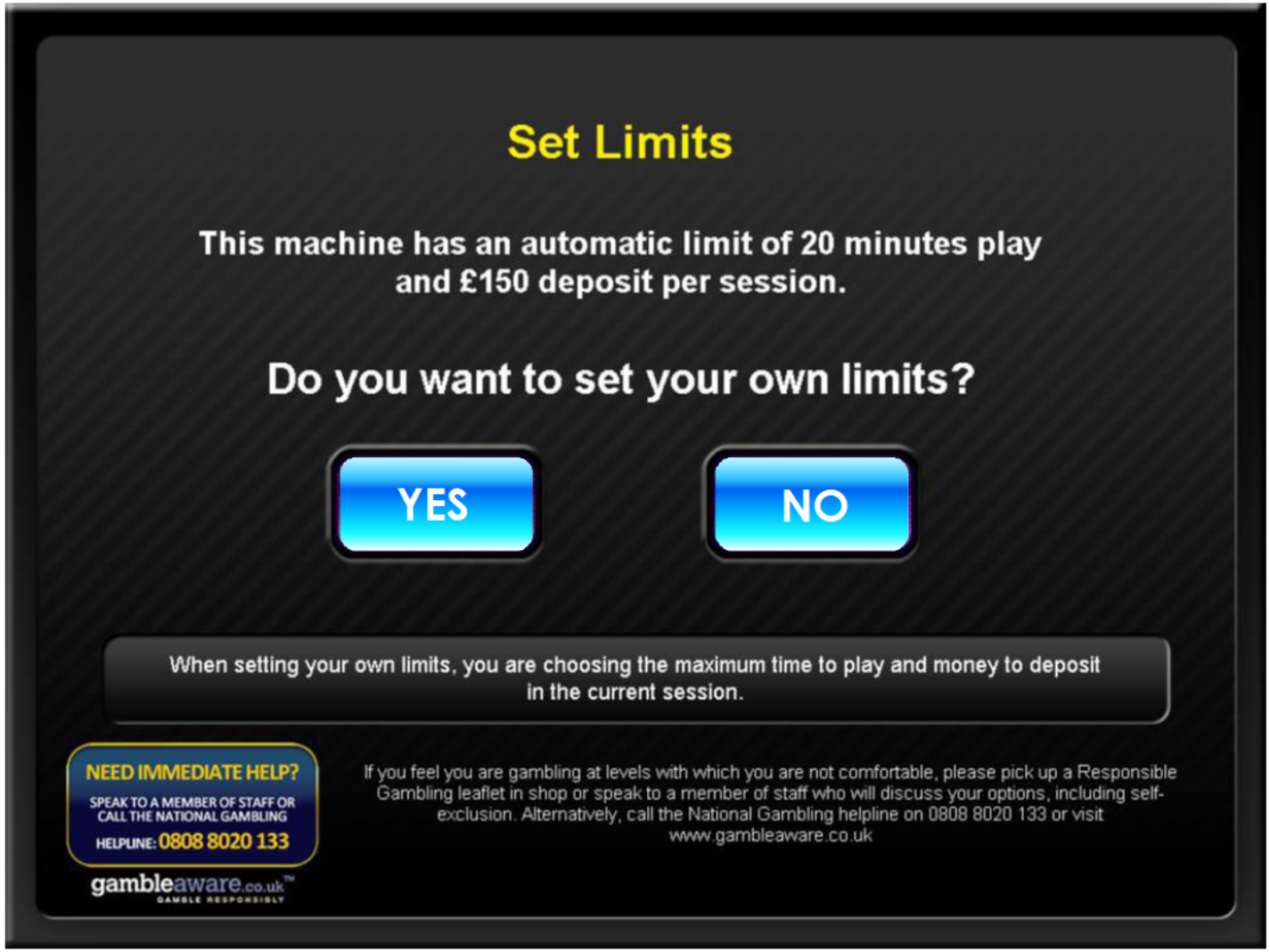
- Mandatory Alerts are displayed for all players

- They are displayed at fixed intervals of Time and Deposit
  - Time since session start
  - Deposit is actual credit **inserted** since session start – *not turnover*

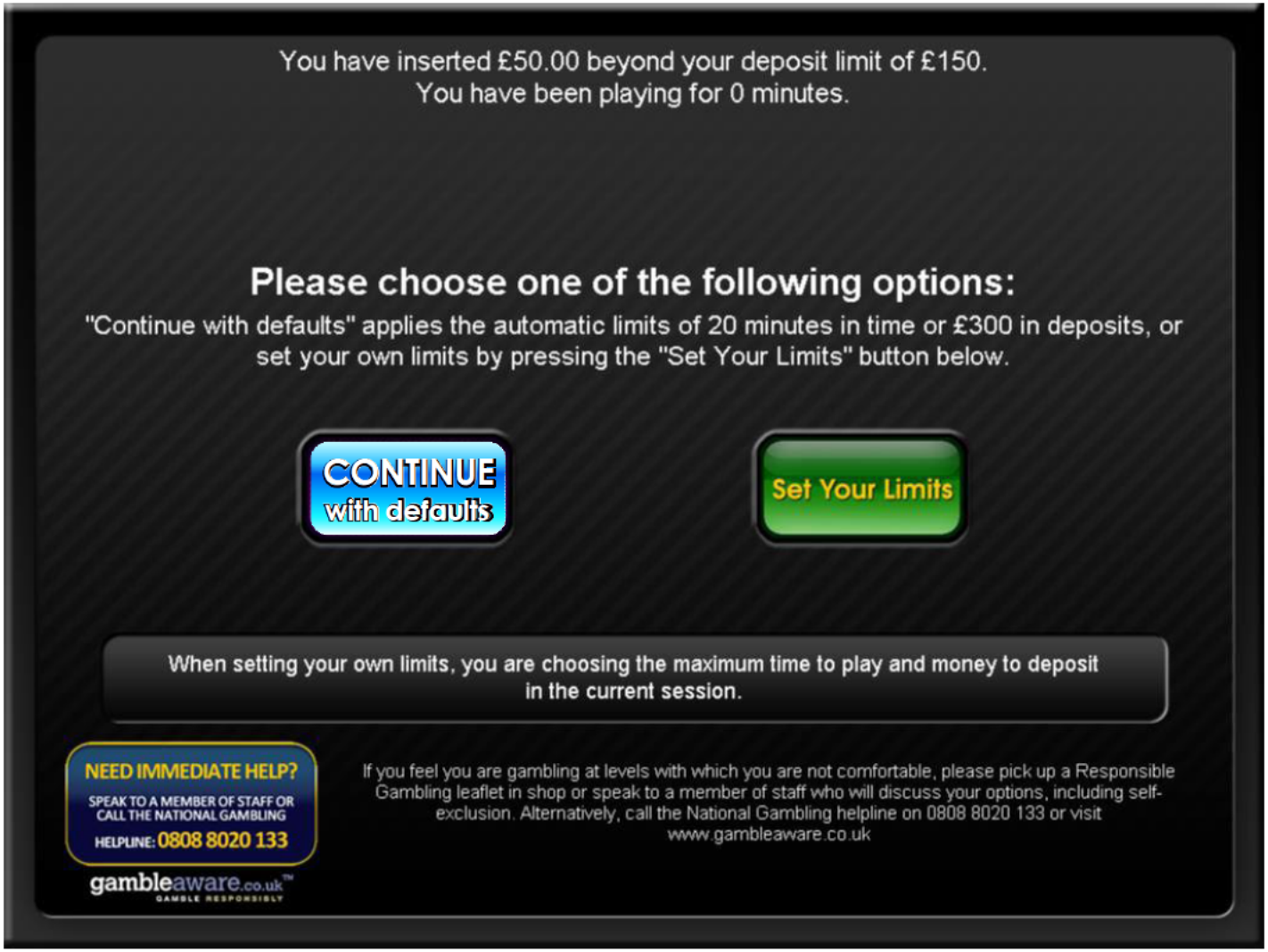
- Current configurations are:
  - Time – 20 minutes
  - Deposit – £150

- When a Mandatory Alert interval is exceeded, play is paused and a message is displayed to the player.
  - The player may dismiss the alert
  - If the alert is dismissed a cooling-off message is displayed
    - The first and second time the player exceeds the mandatory limit the cooling=off period will be 5 seconds
    - The third and subsequent times the player exceeds the mandatory limit the cooling-off period will be 10 seconds

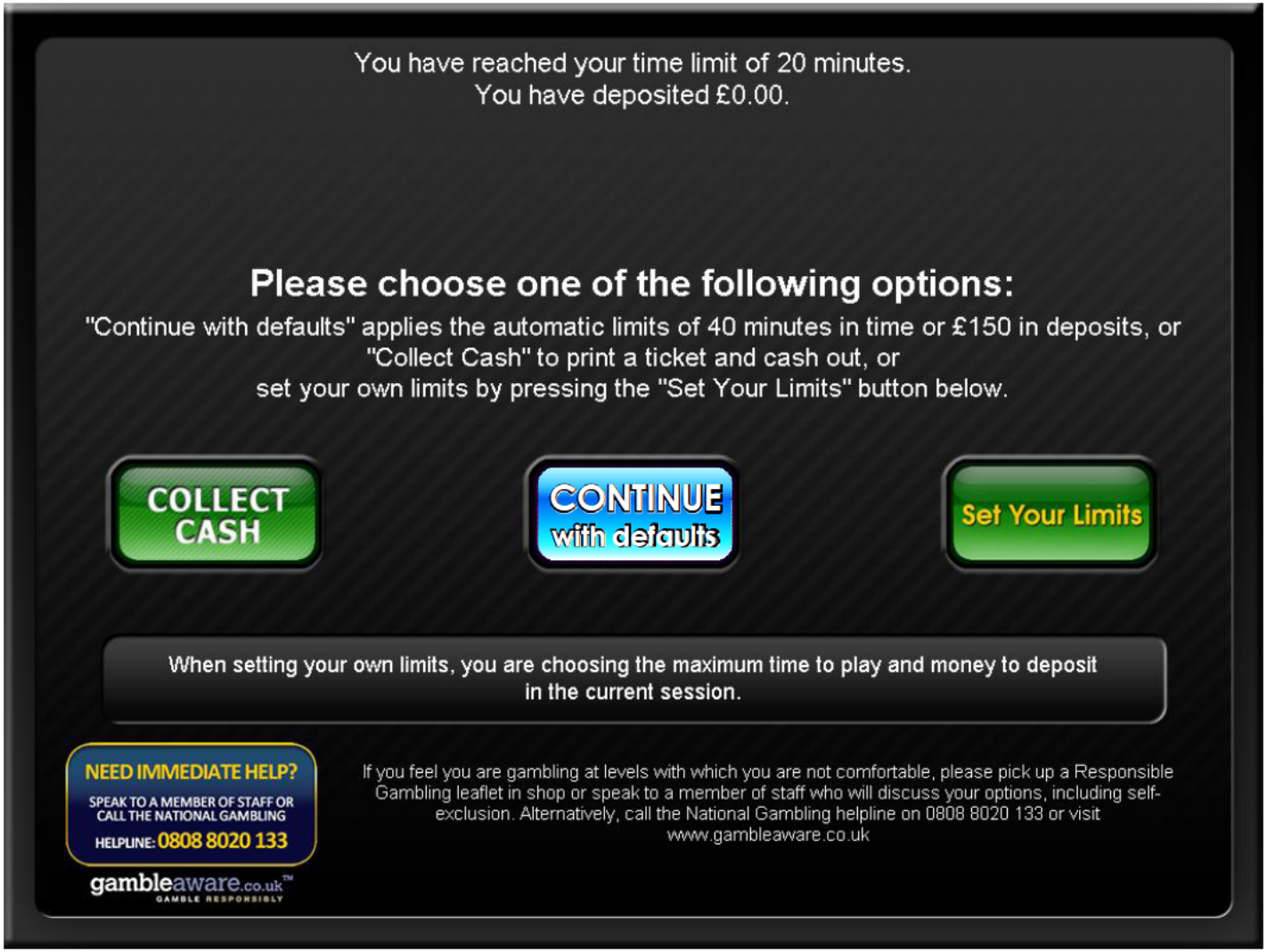
Screenshot – Start of Session



Screenshot – Mandatory Spend Alert (Player)



Screenshot – Mandatory Time Alert (Player)



Screenshot – Cool-Off when Alert Dismissed (Continue with Defaults)

Screenshot – Cool-Off when Alert Dismissed (Press 'Set Your Limits')

[redacted]

Sorry to be a pain. What is your view on my example in point 2 please……

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 06 June 2025 09:52
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: AV testing

Hi [redacted]

Thanks for your enquiry. Yes it is indeed a slightly complicated matter. However we have to allow for all eventualities in terms of reporting and receive accurate data. So on point1 that is correct. Regarding point 2 – let us imagine it is a holiday park – they have a number of AGCs across the park – with -say ALPs attached, we would require a separate report for each of them. To take a similar case – a casino typically offers a number of licensed premises areas each with their own premises licence – again GC would require a separate report for each of these.

I have copied in my colleague [redacted] who may wish to add more. [redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, June 5, 2025 9:36 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: AV testing

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[redacted]

Hope you are well. Can you provide some clarity for me please in terms of the below AV testing and completion of the template….

1. I understand if an operator has an AGC area and an FEC adult area in the same premises an AV test is required in both areas and test results are reported separately.
2. If an operator has 2 or 3 AGC areas (normally grandfather rights) in one premises I presume to test their AV premises they only need to test once and provide one set of test purchase results….

11. Multiple licences. Operators who hold multiple licences in different gambling sectors (for example, bingo, adult gaming centre, casino) must report their test purchase results separately for each licence.

communitycaregaming.org
bacta.org.uk

THE IMPACT OF MANDATORY PLAY BREAKS IN UK ADULT GAMING CENTRES (AGCs)

Lee Willows, Kirstie Hepburn, Professor Paul Dolan
May 2025

Community Care Gaming

bacta

Paul Dolan
pauldolan.co.uk

0. Executive Summary

0.1. This paper presents a conceptual analysis of a proposed regulatory intervention affecting Adult Gaming Centres (AGCs) and small, family-run seaside Family Entertainment Centers (FECs) which also have an over 18 years, AGC area in the United Kingdom. The proposed policy would mandate 30-second breaks in slot machine play every 20 minutes or after customers deposit £150, £300, or £450 on B3, B4 and B3A machines. During these pauses, safer gambling messages would be displayed. Additionally, venue staff would receive alerts when such thresholds are reached, including data on play duration and net spend.

0.2. While intended to promote safer gambling, these changes raise important questions about behavioural responses and overall impact. Drawing on the extant literature from across the behavioural sciences, this paper explores the likely effects of this intervention in low-stakes gambling environments. We discuss the likely effects in relation to five categories of behavioural consequence:

0.2.1. Nudging, with a focus on affective (feelings-based) responses – inter alia, mandatory breaks may disrupt player flow and provoke frustration

0.2.2. Psychological resistance – inter alia, perceived infringements of freedom and autonomy may cause people to disengage entirely

0.2.3. Privacy and stigma – inter alia, the changed relationship with staff and the implicit "social contract" can be undermined in ways that cause more harm than good

0.2.4. Adaptation and habituation – inter alia, habit loops are both hard to break and to replace with new ones, and the time frame may be too short to be effective

0.2.5. Spillover behaviours – inter alia, we are constantly engaging in compensating behaviours, and this could result in multi-machine use or other behaviours that cause the intervention to backfire.

0.3. None of this is to say that the proposed intervention will not work – only that it is unlikely to unless implemented in nuanced ways. Rather than a uniform imposition, the paper recommends adaptive, proportionate safeguards informed by consumer behaviour and local context.

0.4. Whatever else, it must be properly evaluated through an iterative test and learn approach. In the very least, there must be pilot testing prior to national implementation.

0.5. Ultimately, the findings argue for a measured regulatory approach—one that preserves harm reduction objectives without undermining player autonomy, customer experience, or the social fabric of community-based Low stake gaming environments.

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1. Introduction

1.1. Adult Gaming Centres (AGCs) are familiar feature of many high streets in towns and cities across the United Kingdom. Family Entertainment Centres (FECs) are a key feature of seaside towns. Both AGCs and FEC's do typically offer Category D, C and B3 games, providing low-stakes gambling and amusement to a broad demographic, including tourists, retirees, and residents. Despite their casual appearance, these venues are not exempt from the growing scrutiny applied to the gambling sector more broadly, especially considering increasing regulatory efforts aimed at reducing gambling-related harm.

1.2. A new policy proposal under consideration introduces a series of mandatory interventions: a 30-second break in play after every 20 minutes of continuous use or once consumers deposit £150, £300, or £450 into a B3 & B4 machine. During this break, consumers would be shown safer gambling messages. Unlike current systems that implement five-second pauses, this change is designed to interrupt prolonged or intense play and prompt player reflection. Venue staff would also receive alerts when customers reach these thresholds, along with information on session duration and net losses or gains. While consumers retain the option to set personal limits, less than 1% currently do so.

1.3. This paper examines the likely implications of such measures through a conceptual analysis grounded in existing behavioural, regulatory, and public health literature. Specifically, it explores how mandatory breaks and increased staff oversight might influence consumer behaviour, user experience, and the social dynamics of small gambling venues. It critically assesses whether such interventions are likely to reduce harm or, conversely, provoke unintended consequences that cause more harm than good. In so doing, we inform evidence-based discussions on how regulatory interventions should be designed, particularly in socially embedded, low-stakes gambling environments.

2. Regulatory context

2.1. The regulation of gambling in the United Kingdom has undergone significant transformation over the past two decades, with a marked shift toward harm minimisation and consumer protection. The Gambling Act 2005 introduced a liberalised framework that allowed greater accessibility to gambling products, including through Adult Gaming Centres. But concerns over gambling-related harm—ranging from financial loss to psychological distress—have prompted calls for stronger safeguards, particularly in venues frequented by vulnerable or regular consumers.

2.2. In Family Entertainment Centres in particular, machines are typically classified as Category C (maximum £1 stake, £100 jackpot) or Category D (lower stake and prize limits). Category B3 and B4 are located within in specific over 18s areas to protect minors from accessing these machines. These venues are often perceived as low-risk due to their social, family-oriented setting and low-stakes nature. Nonetheless, research has highlighted that harm is not exclusive to high-stakes environments; frequency, duration of play, and impulsivity can also contribute to risk, even at low monetary levels. The UK Gambling Commission (UKGC) has increasingly emphasised that all gambling environments must implement effective responsible gambling tools, regardless of scale.

2.3. Currently, machines in Adult Gaming Centres include optional limit-setting features and brief breaks in play—typically around five seconds—after certain thresholds are reached. However, uptake of voluntary tools is minimal. This has led to proposals for stronger default interventions, including the implementation of 30-second breaks in play at 20-minute intervals or after defined deposit amounts. These breaks would also trigger staff alerts, notifying employees of how long a customer has been playing and how much they have spent or won.

2.4. Internationally, similar harm reduction tools have been trialled with mixed results. In Norway, Australia, and parts of Canada, enforced breaks and machine-based alerts have shown limited behavioural impact unless paired with broader systemic changes. The UK now faces a similar challenge: implementing meaningful safeguards without undermining the customer experience or operational viability of small, community-based gambling venues.

2.5. Blaszczynski et al. (2015) argued that the effectiveness of breaks is highly context-dependent, with minimal impact unless combined with personalised feedback or post-break decision support. In casual environments like Adult Gaming Centres, a short interruption without tailored content is unlikely to shift deeply ingrained play patterns.

2.6. There is clearly the need for more and better evidence on the likely impacts of the intervention. Moreover, the proposed 30-second duration may sit in a grey area—long enough to cause irritation, too short to prompt genuine self-reflection. Without empirical testing, there is a real risk that such breaks simply function as temporal irritants rather than cognitive disruptors. At this stage, we set out the likely impact according to five categories of consequence: nudging, psychological resistance, privacy and stigma, adaptation and habituation, and spillover behaviours

3. Nudging

3.1. The proposed policy can be understood through the lens of nudge theory, where behavioural interventions are designed to steer users toward healthier choices without eliminating freedom of choice (Thaler & Sunstein, 2008). Perhaps the most fundamental lesson from the behavioural sciences over the past couple of decades is that most of what we do simply comes about rather than being thought about. In other words, we are influenced much more by the context within which we make decisions than by the cognition of our minds. Decision-making can be characterised by a dual processing model, whereby "system 1" makes fast, automatic decisions influenced by context in largely unconscious ways and "system 2" makes slow, effortful conscious decisions. This has been most famously articulated by Kahneman in *Thinking, Fast and Slow*, which shows how, in many ways, system 2 is used to validate decisions already determined by system 1.

3.2. This has led to various attempts to gather up the mechanisms through which context (system 1) determines action in ways that are helpful for those charged with designing environments to nudge behaviour. The most notable, perhaps, is the MINDSPACE framework developed by Dolan et al (2010). Each letter of mindspace corresponds to a contextual influence on behaviour. The nine elements are: messenger, incentives, norms, defaults, salience, priming, affect, commitments and ego. We focus here on the role of affect.

3.3. We note that bundling the elements could cause backfire effects. Evidence of this can be seen in Dolan and Metcalfe's 2015 paper on the role of incentives and norms in energy conservation. In this study, the authors examine how some utility companies in the United States tried combining financial rebates for energy consumption with information about lower usage by peers. Whilst each of the incentives and norms worked separately, together they had no overall effect and caused some residents to increase their energy consumption. The mechanism for this is unclear – perhaps people felt insulted by the "double whammy" of being a high energy user and being offered money to change – but it does alert us to the context-dependence of nudges.

3.4. The design features of slot machines and arcade games with multiple win lines are designed to stimulate the brain and cause a rush of adrenalin and excitement. The part of the brain known as the amygdala is central to fear conditioning and threat detection. In gambling contexts, it helps assess the potential risks and losses associated with betting decisions. When functioning normally, amygdala activation can serve as a "brake" system, generating anxiety or fear responses that might discourage risky gambling behaviour.

3.5. The amygdala can also contribute to problematic gambling through emotional hijacking. When highly activated by the excitement of potential wins or the stress of losses, it can override rational decision-making processes in the prefrontal cortex. This can lead to impulsive betting decisions driven more by emotion than logic. Research shows the amygdala responds strongly to "near-misses" in gambling (like getting two out of three matching symbols on a slot machine). These near-miss experiences activate the amygdala's reward circuitry and can intensify the motivation to continue gambling, even though they represent losses (Clark et al, 2018). During gambling losses, amygdala activation can trigger stress responses that paradoxically increase the urge to continue gambling. This can contribute to "loss chasing" behaviour, where people gamble more aggressively to try to recover their losses. Such "near misses" are not a feature of UK machines and not permitted by law, however the random number generator (RNG) may display these periodically.

3.6. By quickly resetting and calming down the amygdala, we can achieve a significant amount in a short space of time. There is some thinking that suggests this could be done in as little as six seconds, though this will depend on the individual and context. It is clear that the chemicals released in our brain when the amygdala is "hijacked" (when we enter the hot state) dissipate very quickly. If we consider the "six seconds" and the things we can do to downregulate the amygdala quicker, it is worth considering switching some of the interventions to a short memory task (unrelated to the player's gaming on the machine) that is fun and entertaining, alongside a proposed nudge (either emotion-based or financial-based as above, but not both).

3.7. In addition, it has recently been stated that *any* cognitively demanding task that activates the executive control network (the part of the brain involved in high-level cognitive functions like attention and working memory) may potentially downregulate the amygdala (de Voogd, Hermans, & Phelps, 2018). Indeed, a downregulation of the amygdala has been observed during the execution of a standard working memory task (de Voogd, Hermans, & Phelps, 2018; de Voogd et al., 2018), with harder cognitive tasks leading to a stronger downregulation (Van Dillen, Heslenfeld, & Koole, 2009; de Voogd, Hermans, & Phelps, 2018).

3.8. Natasha Dow Schüll's work *Machine Gambling* revealed how modern slot machines are designed to create a "machine zone" - a dissociative flow state where players lose track of time, space, and monetary value. Interventions that block and reset this flow state will be beneficial as long as the interruptions are entertaining and don't backfire.

3.9. Several studies caution that abrupt disruption can lead to frustration or irritation, especially if consumers perceive the break as arbitrary. Auer and Griffiths (2015) analysed mandatory play breaks on online gambling platforms and found that breaks longer than 60 seconds were more likely to produce consumer disengagement, while shorter, more frequent breaks often went unnoticed. In the context of physical community venues, a 30-second delay may fall into an ambiguous range—long enough to disrupt, but not necessarily long enough to trigger meaningful self-reflection. The risk is that players will interpret such interruptions as intrusive rather than beneficial.

4. Psychological Reactance

4.1. Enforced breaks may also trigger reactance, a psychological response in which individuals resist rules perceived as infringing on autonomy Norris, Braden E., 2024. In the context of low-stakes recreational gambling, interruptions could be interpreted as condescending or unnecessary, particularly by regular customers who do not display any problem gambling behaviours. This may lead to compensatory behaviour, such as playing multiple machines to maintain uninterrupted activity, or simply swapping choice of machine every 15 minutes.

4.2. One of the pillars of the proposal is the option for consumers to set their own limits. However, consistent evidence shows that voluntary limit-setting tools are significantly underutilised. Hing et al. (2015) and Ladouceur et al. (2012) found that most consumers prefer default settings, largely due to status quo bias—the psychological tendency to accept pre-set options rather than actively choosing alternatives.

4.3. In Adult Gaming Centres, where gambling is often casual or spontaneous, consumers may not feel the need to personalise settings. This raises a critical question: if less than 1% of users currently engage with optional tools, will default imposition of longer breaks change behaviour or merely shift resentment on to the system?

4.4. There is also the risk that consumers will become desensitised to interventions. If breaks and messages occur too frequently, consumers may begin to anticipate and mentally discount them, leading to learned patterns of non-engagement. Behavioural intervention studies in other domains (e.g., seatbelt alarms or smoking cessation prompts) have shown that repetitive, poorly timed prompts often lead to compliance fatigue rather than long-term behaviour change (Noar et al., 2007). Unless the break in play feels meaningful—and is coupled with design elements that promote genuine reflection or the chance to reset—the likelihood of lasting behaviour modification is low.

5. Privacy and Stigma

5.1. It is likely that 30 second interventions every 20 minutes (or related to deposits) will lead to players feeling stigmatised.

5.2. The introduction of 30-second mandatory breaks in play is intended to mitigate excessive gambling by disrupting prolonged sessions and promoting self-awareness. However, literature on gambling behaviour suggests that such interventions can produce a spectrum of responses—some desirable, others counterproductive.

5.3. The introduction of staff alerts implicates surveillance theory, particularly in small venues where consumers and staff often maintain informal (and in many cases longstanding) relationships. According to Lyon (2007, visible monitoring can shift environments from casual to scrutinised, altering behaviour and trust. Customers aware of being tracked may modify behaviour not to reduce harm, but to avoid social judgment.

5.4. The central objective of the proposed intervention—introducing mandatory 30-second breaks and staff alerts—is to reduce gambling-related harm by encouraging behavioural reflection and limiting prolonged, unbroken play. However, the evidence from existing literature raises questions about the practical efficacy of these measures in low-stakes environments.

5.5. One of the most overlooked yet critical aspects of the proposed intervention is its impact on social dynamics and perceived privacy in small, community-based gambling venues. Unlike casinos or online platforms, Adult Gaming Centres often cultivate a familiar atmosphere where customers and staff engage in casual, recurring interactions. In this setting, the introduction of staff alerts tied to customer play behaviour may fundamentally alter these relationships.

5.6. Surveillance literature has long established that the act of monitoring—even when designed to protect—can change behaviour by introducing self-consciousness and suspicion (Lyon, 2007). In the community gambling venue context, real-time alerts informing staff of a customer's session duration, deposit amounts, and win/loss data shift the venue dynamic from informal hospitality to an overt regulated observation. This could undermine the trust that underpins regular customer engagement.

5.7. Zuboff's (2019) notion of "surveillance capitalism" warns that systems designed to optimise or protect behaviour can, if poorly contextualised, instead promote alienation. Customers may feel as though their gambling activity is being scrutinised or judged, particularly in small venues where visibility is high and anonymity is low, a unique strength of the gambling land-based sector in terms of consumer protection.

5.8. A more immediate concern is that mandatory play breaks—especially those triggered by spending thresholds—could make players feel singled out. The pause in machine operation, particularly if accompanied by visible messages or staff engagement, may alert nearby patrons to the player's activity. Research by Hing et al. (2015) on gambling stigma confirms that fear of judgment can discourage help-seeking behaviour and increase concealment strategies. In such a context, even well-intentioned interventions can trigger social discomfort or embarrassment. This may be particularly pronounced among older or habitual players who maintain long-standing relationships with staff. The intervention could be interpreted not as protection but as exposure.

5.9. Literature on workplace monitoring (e.g., Ball, 2010) further shows that when front-line workers are tasked with observing or regulating customer behaviour, relational strain often follows. Staff may be reluctant to act on alerts, fearing conflict or reputational damage with regulars. Conversely, customers may interpret staff interventions as paternalistic or invasive.

6. Adapt and Habituate

6.1. The brain seeks to conserve attentional resources by looking for patterns in behaviour that it can automate. The dual process model shows how slow and effortful system 2 decisions can become fast and automatic system 1 decisions through repeat behaviours that create habit loops. If I'm in the Town Centre, for example, then I go to the AGC. Once I'm in the AGC, the I play the slot machines. Once I play the slot machines, then I keep going until I have no money left.

6.2. Slot machine play itself often involves habitual or compulsive reinforcement loops, where continuous feedback sustains engagement. Disrupting these loops may reduce harm, but also provoke irritation or workaround strategies. Understanding these behaviours is essential to evaluating the real-world effects of mandatory breaks. We also adapt and habituate: if we navigate past the prompts and interventions without any adverse consequence, we may register a reduced emotional and behavioural reaction.

6.3. At present, mandatory breaks are accompanied by safer gambling messages, but these too are subject to diminishing returns. According to Monaghan and Blaszczynski (2010), message fatigue sets in when consumers are exposed to repetitive, generic messages. As consumers become habituated, the messages lose salience, even when frequency is increased.

7. Spillover behaviours

7.1. No behaviour sits in a vacuum, and one behaviour can greatly affect what happens next. Behaviours are linked, at a conscious or unconscious level, by some underlying motive. The first behaviour leads to another behaviour which can either work in the same direction as the first (*promoting* spillover) or push back against it (*permitting* or *purging* spillover). There is pervasive evidence for all kinds of spillover effects across a variety of fields and domains. As a result, it is imperative that we try to capture all the ripples from one behaviour to the next when a pebble of intervention is thrown in the pond, and not just at the immediate behavioural splash it makes (Dolan and Galizzi, 2015).

7.2. For example, Dolan and Galizzi (2014a) investigated how the effect of a financial incentive (intervention) on a physical activity (behaviour 1)—stepping on a 6-inch high stepper—spills on to subsequent eating (behaviour 2). Compared to the control condition, both high incentives (£0.10 per step) and low incentives (£0.02 per step) significantly increased the number of steps participants performed. However, whereas low incentives (vs. control) did not impact subsequent eating behaviour, high incentives increased calorie intake, thus resulting in people consuming more calories than they burned.

7.3. Existing literature also documents compensatory gambling behaviours, in which players actively circumvent imposed restrictions. Gainsbury et al. (2015) observed that when time-based play limits were introduced on digital platforms, some players responded by opening multiple windows or switching between games to avoid downtime.

7.4. In physical venue settings, a comparable risk emerges: consumers may start alternating between machines to bypass enforced breaks. This undermines the goal of reducing continuous play and could inadvertently increase gambling intensity by enabling back-to-back play across multiple machines. While the regulation aims to insert reflection points, some players may view it as a technical hurdle rather than a protective mechanism. Studies on gambling migration (e.g., Hing et al., 2014) have shown that consumers frustrated with land-based restrictions may shift to online platforms, which offer greater anonymity and flexibility.

7.5. In the context of Adult Gaming Centres, long-term or frequent consumers might respond to increased interruptions and staff oversight by choosing to gamble online, where breaks are shorter or avoidable, and behaviour is less observable, especially within unregulated sites. This is the very reason why the black market is a direct challenge to regulated markets. This raises a policy dilemma: interventions that create excessive friction in low-harm settings may drive consumers toward higher-risk, less regulated environments. Without due attention to all the possible spillovers of these interventions, the intention to protect may actually increase risk.

8. Policy Recommendations

8.1. The findings from existing literature suggest that while the intention behind mandatory play breaks and staff alerts is commendable, the proposed intervention may not achieve its harm reduction objectives in its current form. A more effective approach might be involving tailoring interventions based on the behavioural risk profile of consumers. Rather than imposing a universal 30-second break after fixed time or deposit thresholds, a tiered intervention system that escalates in response to repeated patterns of intensive play would likely be more proportionate and less intrusive. Such adaptive frameworks have shown greater user acceptance in jurisdictions like Norway and Australia, where regulatory measures are calibrated to player engagement levels.

8.2. Alternatively, the same message could go to everyone to avoid the stigma referred to above. This lends itself to direct empirical investigation through a randomised controlled trial and an agile, iterative test and learn environment. Although this would not be as effective.

8.3. Privacy concerns surrounding staff alerts also require reconsideration. The visibility of real-time alerts in small venues may unintentionally expose player behaviour and damage customer trust. As such, a redesign of the alert system is warranted. Options include: delaying alerts until the end of a session, anonymising notification content, or limiting disclosures to focus on significant risk flags could help reduce the perception of surveillance and preserve the informal rapport between staff and customers. Again, these require testing and real-world experimentation.

8.4. In terms of messaging, the literature indicates that repeated static prompts tend to result in habituation and message fatigue. Therefore, safer gambling messages displayed during breaks should be personalised, reflective, and entertaining. Prompts that encourage conscious decision-making are more effective than generic warnings. The messaging strategy must be carefully designed to avoid cognitive disengagement, especially in low risk, but still regulated gambling environments.

8.5. Before adopting these measures nationwide, a pilot implementation should be conducted in select venues. This would allow regulators and stakeholders to monitor actual behavioural responses, detect any unintended consequences, and adjust the intervention design based on real-world feedback. Evidence-led refinement is critical to ensuring both efficacy and acceptability.

8.6. Harm reduction strategies must balance efficacy with respect for player autonomy and the unique character of low-stakes venues. Future policy design should proceed cautiously, grounded in empirical evidence and refined through controlled, context-specific pilot implementations. Context is everything: we have suggested a number of different approaches that could be trialled in real-world environments. As a result, we should be cautious about generalising results.

8.7. This paper has examined the potential consequences of introducing mandatory 30-second play breaks and staff alerts in prominently run Adult Gaming Centres, drawing solely from existing literature and conceptual frameworks. While the proposed measures aim to promote safer gambling, the evidence suggests a risk of unintended behavioural, social, and operational outcomes, including evasion tactics, message fatigue, and diminished trust between customers and staff. One feature which has come up time again through this research is the nature of the relationship between the customer and venue staff.

Lee Willows MBA
Founder, Community Care Gaming

Kirstie Hepburn MA (Oxon)
London School of Economics and Political Science (LSE)

Prof Paul Dolan
Professor of Behavioural Science at the London School of Economics and Political Science (LSE)

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Regulated by the Community Interest Company Regulator

Company Registration number 13566221 | VAT registration number: 391 4171 96.
Corporation Tax reference number: 75315 26940 | Apprenticeship Gateway, account ID: JNK6NK

From: [redacted]
To: [redacted]
Subject: RE: SESOG data
Date: 13 June 2025 10:06:00
Attachments: image001.png
image002.png
image003.png

Hi [redacted]

Yes, 2.00pm works fine for me, I'll send you a Teams invite.

Kind regards

[redacted]
GAMBLING COMMISSION
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]@bacta.org.uk>
Sent: Friday, June 13, 2025 10:00 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: SESOG data

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

Hi [redacted]

Sorry I didn't get back to you yesterday.

Can you do 2.00pm today?

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 12 June 2025 14:11
To: [redacted]@bacta.org.uk>
Subject: FW: SESOG data

Hi [redacted]

If you have time for a short chat over Teams about this tomorrow, my day is pretty free.

Kind regards

[redacted]
GAMBLING COMMISSION
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]
Sent: Tuesday, June 10, 2025 8:58 AM

[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: SESOG data

[redacted] and [redacted]

For the breach data points that we collect, please would you confirm which figures relate to these two questions:

Question 3a. Total number of attempted breaches (tried to get in the door and/or website but were stopped and/or didn't gamble)

Total number of attempted breaches of self-exclusion, where they were successfully identified trying to get into the premises and/or website or gained entry to the premises and/or website but were turned away prior to being able to gamble, during the reporting period (report number of breaches, not individuals). GAMSTOP will report the total number of log in attempts.

Question 3b. Total number of full breaches (gained entry to premises and/or website and gambled)

Total number of full breaches of self-exclusion, where they gained entry to the gambling premises and/or website and were able to gamble, during the reporting period (report number of breaches, not individuals).

Is the response to question 3a [redacted] and the response to question 3b [redacted]

Many thanks for confirming.

Regards

27				
28	**BreachCount**		**BreachType**	
29		10	Attempted	
30				
31	**TotalExtensions**			
32		16		
33				
34	**IndividualBreachCount**		**TotalBreachCount**	
35		37		50
36				

[redacted]
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This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from

Hi [redacted]

Thanks for confirming you have the call in your diary.

[redacted] is looking forward to speaking with you too.

Best
[redacted]

From: [redacted]
Sent: Monday, June 23, 2025 1:15 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Catch up call

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Hi [redacted]

My calendar is showing the meeting at 3pm.

Apologies for any confusion.

Looking forward to speaking with [redacted]

Kind regards,

[redacted]

Sent from my iPhone

> On 23 Jun 2025, at 12:48, [redacted]
> [redacted]@gamblingcommission.gov.uk> wrote:
>
> Hi [redacted]
>
> Just wanted to double check that the 3pm call with [redacted] today is in your diary as it doesn't look as if the invite has been accepted by you?
>
> Thanks
> [redacted]
>
> ---
>
> **From:** [redacted]
> **Sent:** Monday, June 16, 2025 12:11 PM
> **To:** [redacted]
> **Subject:** RE: Catch up call

Hi [redacted]

Thank you for advising. Will your BACTA email address be: [redacted]@bacta.org.uk?

I will send over a meeting invite for 3pm next Monday.

Best wishes
[redacted]

From: [redacted]
Sent: Monday, June 16, 2025 11:52 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Catch up call

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Hi [redacted]

[redacted]

My bacta email will also be in use.

Regarding a meeting with [redacted] next Monday afternoon would be ideal.

Could I suggest 3pm?

Kind regards,

[redacted]

Sent from my iPad

> On 16 Jun 2025, at 09:11, [redacted] [redacted]
> [redacted]@gamblingcommission.gov.uk> wrote:
>
> Good morning [redacted]
>
> Further to [redacted] email to you on Friday (as below), we received an undeliverable message, hopefully this email

address is correct and makes its way to you. Please can you advise if this is the correct email address going forward once you are fully in post?

With regard to setting up a meeting between [redacted] and yourself, I wonder if you could be available on either this Friday, 20 June in the morning or on Monday 23 June anytime between 2 & 4pm.

I look forward to hearing from you.

Kind regards

[redacted]

From: [redacted]
Sent: Friday, June 13, 2025 5:48 PM
To: [redacted] bacta.org.uk; [redacted] gamblingcommission.gov.uk>
Subject: Catch up call

Hi [redacted]

I hope you're well.

As the [redacted] it would be useful for us to have a catch up. We are starting to see a growing number of regulatory issues emerging in the AGC sector and it would be useful to have a conversation about how BACTA can support us in getting some messages out to the sector and support your members in improving their compliance.

I'll ask [redacted] in my office to get in touch to find a time that works for us both.

Kind regards

[redacted]

<image001.jpg> [redacted] <image002.png>
www.gamblingcommission.gov.uk

From: [redacted]
To:
Subject: Re: Self-exclusion
Date: 27 June 2025 16:01:43

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

Great cheers

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, June 27, 2025 3:27:07 PM
To: [redacted]@bacta.org.uk>
Subject: Re: Self-exclusion

Sure [redacted]

9AM is good for me?

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, June 27, 2025 11:31
[redacted]@gamblingcommission.gov.uk>
Subject: Self-exclusion

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

[redacted]
Can we have a call on Monday morning. I could do with discussing operators licenses, sites and the MOSES . We could do with some clarity . [redacted]

Cheers [redacted]

[redacted]

29-30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

Image

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

From: [redacted]
Sent: Wednesday, July 2, 2025 3:15 PM
To: [redacted]@bacta.org.uk>
Subject: RE: Follow up from last week

Thanks for that update, [redacted] That's helpful and good to hear.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, July 1, 2025 4:58 PM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Follow up from last week

You don't often get email from [redacted]bacta.org.uk. Learn why this is important
CAUTION: This email is from an external source be careful of attachments and links

`Dear [redacted]

I hope this message finds you well. I thought I would send a short follow-up note after our meeting last week - thanks again for taking the time to meet with me. I thought it was beneficial for both of us and I look forward to working with you during my tenure as [redacted].

Following on from our discussion on self-exclusion, we are taking a number of steps to address the recent concerns:

- Site Operator training sessions in Portsmouth on 3rd July 2025;
- Review of Social Responsibility Charter and bacta Code of Practice;
- Strengthening membership messaging regarding self-exclusion; and
- Formation of a Working Group to evaluate technology solutions.

As you may know, our [redacted], had a meeting [redacted] last week and as you alluded to previously, the necessity of finding a solution to the identified issues has become apparent.

We have arranged to have a discussion with [redacted] tomorrow, however, I wanted to make sure to keep you updated in this regard. As we progress, we'll make sure to keep you updated as we value your input.

Kind regards,

[redacted]

[redacted]

bacta
Delivering the Serious Business of Fun for 50 Years

29-30 Ely Place
London EC1N 6TD

Email: [redacted]@bacta.org.uk
Main Line: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

From: [redacted]
To:
Subject: Re: Commission - New engagement senior manager
Date: 08 July 2025 14:04:57
Attachments: image001.png

Hi,

That would be great,thank you, do you have any specific dates that you would prefer or cannot make.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, July 8, 2025 13:49
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Commission - New engagement senior manager

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Hi [redacted]

From a compliance point it would be myself that would be the main contact.

Would be more than happy to meet up with you in the next couple of weeks.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 08 July 2025 08:56
To: [redacted]@bacta.org.uk>
Subject: Commission - New engagement senior manager

Hi [redacted]

I hope you are well. Our compliance team has a new senior manager, [redacted] responsible for industry engagement and it would be great to catch up with colleagues from Bacta to introduce [redacted] and hand over the compliance point of contact.

My main initial point of contact has previously been through [redacted] Would you mind advising who within BACTA would be the best ongoing contact for [redacted] to engage with.

It would be great if you could provide a point of contact that we could arrange a catch up with in the next few weeks.

Hi [redacted]

Many thanks for your reply.

Yes, I have just checked [redacted] diary once again and the slot from 9 a.m. to 10 a.m., on July the 23rd, sounds perfect!

Thank you for sending the Teams invite across, however, I am afraid that [redacted] would attend the meeting (but please feel free to include me if you wish).

I wish you a nice day ahead.

Kind regards
[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 09 July 2025 09:24
To: [redacted]@bacta.org.uk>
Subject: Re: Commission - [redacted] - Meeting with [redacted] from Bacta

Hi [redacted]

Thank you for your email. A Teams meeting would be preferable please.

9-10 on 23rd July would be perfect. I will send across an invite and include you if that ok?

thank you

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, July 8, 2025 16:34
To: [redacted]@gamblingcommission.gov.uk>
Subject: Commission - [redacted] - Meeting with [redacted] from Bacta

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

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

Dear [redacted]

I hope this email finds you well.

I am glad to meet you, my name is [redacted] I am [redacted] assistant. [redacted] has asked me to check his diary for your meeting-to-be in the next few days.

Next week and the following one seem pretty much all right for [redacted] at the moment, apart from:

- 17th July – He could only do on Teams, any time from 9 a.m. to 12 p.m.

- 23rd July – He could only do on Teams, from 9 a.m. to 10 a.m.

May I ask you please if you would rather prefer for your meeting to be held in person in Birmingham, or virtually on Teams?

Waiting for your kind reply, many thanks.

Kind regards,

[redacted]

bacta
Delivering the Serious Business of Fun for 50 Years

29-30 Ely Place
London EC1N 6TD

Main Line: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

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Hi [redacted]

Apologies for not replying sooner. We haven't issued anything as yet. However, I intend to pick this up [redacted]. I can only apologise for the delay but I should have a draft before the end of the month.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, July 9, 2025 4:46 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Hello

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[redacted]

Did anything come out yet in an e bulletin about this. If not could you drop me a few bullet points and I can get it out to our members in due course…

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 28 May 2025 14:23
To: [redacted]@bacta.org.uk>
Subject: RE: Hello

Hi [redacted]

It was lovely to meet both you and [redacted] and I'm glad you found the meeting helpful.

We are currently drafting a piece to go in our e-bulletin during June, and to ensure our message our messages work together, I would like to get our piece signed off first.

I hope that's ok and I will be in touch later next week.

Many thanks

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, May 28, 2025 11:29 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: FW: Hello

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[redacted]

It was good to have a chat last week and understand the work of the undeclared project and other issues around changes of corporate control etc.

Would you be able to drop me a few bullet points so I can point my members in the right direction please. I will hopefully get this out in [redacted] Briefing' next week and it will complement something you may wish to circulate in due course on the e bulletin….

Cheers [redacted]

From: [redacted]
Sent: 22 May 2025 10:19
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Hello

[redacted]

I have sent out an invite to [redacted] to attend our Teams meeting this afternoon. [redacted]) who deals with issues such as changes of corporate control for some of our members will no longer be dialling in…. See you later…

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 24 April 2025 14:00
To: [redacted]@bacta.org.uk>
Subject: RE: Hello

Hi [redacted]

That date and time work well, that you for organising the meeting.

[redacted]

Last year [redacted] project on undeclared CoCC's and I think this was what you referred to whilst we were at the conference. It would be good to discuss what we

found last time with you and what would be helpful to share with your members so they are able to let you know as soon as any changes take place.

I have also asked my colleague[redacted], who is a [redacted]o attend as he lead on the undeclared project and will be able to add further insight, along with [redacted] who is a Manager on the team. I will forward the invitation on to them once you've sent it.

If you need anything else in advance of us meeting, please let me know.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Thursday, April 24, 2025 1:05 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: RE: Hello

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[redacted]

Can we do 2pm on 22nd May please. I will set up a Teams meeting.

[redacted] In terms of our discussion what are your areas of responsibility so I can understand what my members or colleagues can glean from our conversation….

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 23 April 2025 14:19
To: [redacted]@bacta.org.uk>
Subject: RE: Hello

Hi [redacted]

Unfortunately I can't do either of those date, one is our colleague conference date and the other is already full of meetings!

Can we arrange a Teams meeting, I am free on 15 May and can be flexible with time or I'm available on the afternoon of 22 May. Please let me know if those work for you – if not I'll look at other dates and times.

Many thanks

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, April 22, 2025 10:16 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Hello

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[redacted]
How are you fixed for me coming to Victoria Sq on Wed 14th or 21st May. I can do any time I'm sure an hour will suffice. If not let me know some convenient dates for Teams…

Cheers [redacted]

[redacted]

29 30 Ely Place
London
EC1N 6TD
[redacted]
www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, April 15, 2025 12:10:38 PM
To: [redacted]@bacta.org.uk>
Subject: RE: Hello

Hi [redacted]

A Teams meeting would be fine or you are welcome to meet at the office in Birmingham – I am there most Wednesdays. Just let me know what works best for you and I can arrange either a teams meeting or a meeting room.

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Saturday, April 12, 2025 8:41 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Hello

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important
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[redacted]

Sorry for the delay in replying [redacted]. Perhaps we can organise a Teams meeting some time to discuss the issues [redacted] so I can always pop in to discuss at your offices....

Cheers [redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Friday, April 4, 2025 09:55
To: [redacted]@bacta.org.uk>
Subject: Hello

Hi [redacted]

It was lovely to meet you this week at the Operators Engagement Forum. As promised here are my contact details.

[redacted], but it would be good to catch up when I'm back to discuss how we communicate better with your members and if there is more we can do regarding undeclared changes of control.

Kind regards

[redacted]

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This email and any files transmitted

Hi [redacted]

You have a good weekend too.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 11 July 2025 12:24
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Re: List of participating operators

Thanks [redacted]

Have a good weekend when you get there

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Friday, July 11, 2025 10:59
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: List of participating operators

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Hi [redacted]

Please find list as requested. Sorry I couldn't get it to you sooner.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 07 July 2025 12:04
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: List of participating operators

Dear all,

I'd be grateful if you could send me and [redacted] the full list of operators participating in each of your AGC multi-operator self-exclusion schemes. This is to ensure we have an up to date and complete list of operators currently participating in multi-operator self-exclusion schemes in the arcade sector. Ideally, we would like a list of premises covered too.

It would be helpful to receive this information as soon as possible this week.

Let me know if you have any questions.

Many thanks

[redacted]

[redacted]

Victoria Square House
Victoria Square
Birmingham
B2 4TP

Mob. [redacted]

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Good morning [redacted]

Many thanks for your email, this is well noted.

Kind regards,

[redacted]

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29-30 Ely Place
London EC1N 6TD

Main Line: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

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If you have received this message in error, please send it back to us, and immediately and permanently delete it. Do not use, copy or disclose the information contained in this message or any attachments.

From: [redacted]gamblingcommission.gov.uk>
Sent: 15 July 2025 17:14

To: [redacted]@bacta.org.uk>
Subject: FW: Commission - [redacted] Meeting with [redacted] from Bacta

Dear [redacted]

I hope you don't mind me getting touch.

As you know, my colleague [redacted] and I are meeting with [redacted] next Wednesday.

One of the things I wanted to discuss with [redacted] is whether he would like to join our Operator Engagement Forum working group. [redacted] represented Bacta on the group until recently.

I thought it might be helpful to give you the details of the next working group meeting in advance of next week, so that if [redacted] does want to join us, you have plenty of notice. It's 29 July, 10-11am, via MS Teams.

I hope that's helpful.

All the best,

[redacted]

[redacted]
[redacted]
[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Tuesday, July 8, 2025 16:34
To: [redacted]@gamblingcommission.gov.uk>
Subject: Commission - [redacted] - Meeting with [redacted] from Bacta

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

You don't often get email from [redacted]@bacta.org.uk. Learn why this is important

Dear [redacted]

I hope this email finds you well.

I am glad to meet you, my name is [redacted] I am [redacted]. [redacted] has asked me to check his diary for your meeting-to-be in the next few days.

Next week and the following one seem pretty much all right for [redacted] at the moment, apart from:

- 17th July – He could only do on Teams, any time from 9 a.m. to 12 p.m.
- 23rd July – He could only do on Teams, from 9 a.m. to 10 a.m.

May I ask you please if you would rather prefer for your meeting to be held in person in Birmingham, or virtually on Teams?

Waiting for your kind reply, many thanks.

Kind regards,

[redacted]

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29-30 Ely Place
London EC1N 6TD

Main Line: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

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@bactauk @tickets2wishes

Outlook

Re: Contact details for multi-operator self-exclusion

From [redacted]@gamblingcommission.gov.uk>
Date Wed 7/16/2025 2:23 PM
To [redacted]@bacta.org.uk>

Great, thanks for confirming so quickly

Kind regards

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, July 16, 2025 14:17
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Contact details for multi-operator self-exclusion

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Hi [redacted]

I can confirm that I am ok with the contents of this link as requested.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 16 July 2025 14:14
To: [redacted]@bacta.org.uk>
Subject: Contact details for multi-operator self-exclusion

Hi [redacted]

Please find a link to the information currently on our website about who operators should contact to join a scheme. Grateful if you check the bacta entry and either confirm you are content or provide me with amends asap please.

https://www.gamblingcommission.gov.uk/licensees-and-businesses/page/non-remote-multi-operator-self-exclusion

As discussed, we neeed this to include in a letter we are going to issue to all AGC licensees reminding them of their responsibilities in relation to self-exclusion.

Many thanks

[redacted]

Hi everyone

Hope you're all well.

Just a reminder that the quarterly data for the period April to June 2025 is now due.

Kind regards

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[redacted]

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21 July 2025

Sent by email only

Dear Licensee,

Self-exclusion requirements for adult gaming centre licensees

We are writing to all adult gaming centre (AGC) licensees to remind them of their obligations regarding self-exclusion requirements and to address compliance concerns identified during recent visits.

Licence requirements

All AGCs must have effective processes and procedures in place for customers who wish to self-exclude. These requirements are set out in the Licence Conditions and Codes of Practice (LCCP):

- LCCP Condition 3.5.1 - Non-remote and trading rooms Social Responsibility (SR) code
- LCCP Condition 3.5.2 - Non-remote ordinary code
- LCCP Condition 3.5.6 - Multi-operator non-remote SR code

Multi-operator self-exclusion scheme participation

You must participate in a multi-operator self-exclusion scheme. This requirement has been in place since 2016.

If you are not currently participating, you must join either the Bacta scheme or SmartExclusion immediately. Contact details are set out below:

Victoria Square House
Victoria Square
Birmingham
B2 4BP
T+44 121 230 6666
www.gamblingcommission.gov.uk

GAMBLING COMMISSION

BACTA Scheme Manager

29-30 Ely Place

London

EC1N 6TD

Tel: 020 7730 6444

Email: selfexclusion@bacta.org.uk

SmartExclusion - Boomerang Digital

To sign up to SmartExclusion please call or email:

Tel: 01482 44 11 42 and select option 3

Email: SmartHubSupport@boomerangdigital.co.uk

Web: www.ihlhub.com

These schemes work together to provide a single system that enables customers to self-exclude from areas where they live, work and socialise.

Required procedures and controls

You must ensure that:

- you can accept multi-operator self-exclusion requests from customers
- you have procedures to enable self-exclusion requests and take all reasonable steps to prevent self-excluded customers from gambling across every AGC you operate
- you can effectively identify self-excluded customers
- your staff are appropriately trained to administer self-exclusion and signpost customers to counselling and support services.

Compliance concerns and enforcement action

Recent compliance visits have identified shortcomings in self-exclusion controls and in some cases we have identified operators who do not have required self-exclusion processes in place. In such cases operators can expect that we will consider an immediate suspension of the operating licence. We strongly encourage every AGC operator to proactively review their controls to ensure full compliance.

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We have also seen examples of where operators have confirmed to us that they have self-exclusion in place when this has not been the case. Any evidence of misleading the regulator will likely lead to us considering the suitability of any licence holders.

Given the potential for longstanding non-compliance, we will consider enforcement action even if you join a scheme now. We will be taking steps to identify any licensees not participating in a multi-operator scheme.

Reporting requirements

If you do not have the required controls in place, you must report this to the Commission under Licence Condition 15.1.1. Any failure to make such a report will be considered as a further regulatory breach and will be taken into account when considering any regulatory penalties. You must also put measures in place immediately to ensure compliance going forward.

Next steps

Please review your current self-exclusion procedures and ensure you meet all requirements, as a matter of urgency. We will continue to assess self-exclusion controls as part of our ongoing programme of compliance assessments.

If you have any questions regarding these requirements, please contact your allocated Commission contact in the normal way.

Yours Sincerely,

[redacted]

[redacted]

[redacted]

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Victoria Square House
Victoria Square
Birmingham
B2 4BP
T+44 121 230 6666
www.gamblingcommission.gov.uk

Hi [redacted]

Many thanks for this.

I look forward to seeing you on Wednesday also.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 21 July 2025 11:20
To: [redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: Letter sent to AGC operators

Good morning [redacted]

I wanted to share a copy of the attached letter with you for information. It was sent to all AGC licensees this morning, to remind them of their obligations in relation to self-exclusion.

I understand that my colleague [redacted] had already informed you this was on its way.

I hope it's helpful to see, and look forward to meeting you on Wednesday.

All the best,

[redacted]

[redacted]

[redacted]

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This email and any files transmitted with it are intended solely

Hi [redacted]

That's all booked in, see you on the 3rd September.

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Monday, July 21, 2025 9:05 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Meeting

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

Hi [redacted]

Sorry it has taken a while to get back to you.

The 3rd at 10.00am would work well for me.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 11 July 2025 09:34
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Cc: [redacted]@gamblingcommission.gov.uk>
Subject: RE: Meeting

Hi [redacted] [redacted]

Thanks for your email.

We too have some periods of leave coming up, so the best dates will be:

20th August
3rd September
10th September
17th September

Let me know which one suits and I'll book it in.

We have a new Senior Manager, so I'll invite her along too.

Thanks

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, July 9, 2025 4:58 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>
Subject: Meeting

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[redacted]

Hope you are well. We had our last meeting on 6/11/24. It may be time to pencil another meeting in the diary where we can discuss any current trends or issues. I have recently reminded our members of the process of sharing information and to look at the 'tell us in confidence' page on the website.

I am away on leave 12/7 – 12/8/25. Could you suggest some possible dates and forward to [redacted] please…..

Cheers [redacted]

[redacted]
Mobile: [redacted]
E-mail: [redacted]@bacta.org.uk

29-30 Ely Place
London
EC1N 6TD
020 7730 6444
www.bacta.org.uk

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Outlook

RE: GC FOI Self exclusion

From [redacted]

Date Wed 7/30/2025 5:34 PM

To [redacted]@bacta.org.uk>

Hi [redacted]

Thank you for sending the missing figures across – we intend to use these estimates in our response.

Kind regards

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[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, July 30, 2025 9:32 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: GC FOI Self exclusion

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Hi [redacted]

I have filled in the gaps below with the data I have sent.

The Smarthub numbers look high have they confirmed these?

Can you please send me a copy of the final data that you do send regarding the FOI.

Many thanks

[redacted]

The data sets which are in scope for the request are set out below and relate only to land-based self-exclusions:
Q1 Total number of new self-exclusions added to the scheme during the reporting period

Sector	Scheme	FY22	FY23	FY24
AGC	BACTA	4,234	2,950	1,226
	SmartHub AGC	2,720	5,495	10,115
	Total	**6,954**	**8,445**	**11,341**

Bingo	High St Bingo	3,191	4,256	5,154
	Retail Bingo	657	711	691
	Total	**3,848**	**4,967**	**5,845**
Betting	MOSES	5,860	6,940	6,688
	Total	**5,860**	**6,940**	**6,688**
Casino	SENSE	3,914	4,153	5,046
	Total	**3,914**	**4,153**	**5,046**

Q2 Total number of individuals or people who have added a self-exclusion during the reporting period.

Sector	Scheme	FY22	FY23	FY24
AGC	BACTA	4,065	2,832	1,177
	SmartHub AGC	2,661	5,221	9,276
	Total	**6,726**	**8,053**	**10,453**
Bingo	High St Bingo	3,139	4,058	4,774
	Retail Bingo	475	514	691
	Total	**3,614**	**4,572**	**5,465**
Betting	MOSES	5,860	6,940	6,688
	Total	**5,860**	**6,940**	**6,688**
Casino	SENSE	3,913	4,146	5,046
	Total	**3,913**	**4,146**	**5,046**

Q6 – Total number of active self-excluded customers

Sector	Scheme	FY23	FY24
AGC	BACTA	3,393	1,013
	SmartHub AGC	21,473	21,669

	Total	**24,866**	**22,682**
Bingo	High St Bingo	18,813	21,376
	Retail Bingo	15,033	15,837
	Total	**33,846**	**37,213**
Betting	MOSES	20,097	38,993
	Total	**20,097**	**38,993**
Casino	SENSE	57,612	48,447
	Total	**57,612**	**48,447**

[redacted]

[redacted]

[redacted]

bacta
Delivering the Serious Business of Fun for 50 Years

29 30 Ely Place
London
EC1N 6TD
Tel: [redacted]
Mobile: [redacted]
Web: www.bacta.org.uk

[redacted]

[redacted]

[redacted]

[redacted]

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, July 30, 2025 9:12 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: SESOG data

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

Hi [redacted]

In response to your email below, Boomerang cannot give us this number exactly but from some analysis the numbers are likely to be

2022 4065
2023 2832
2024 1177

If you have any further questions, please let me know.

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 29 July 2025 15:59
To: [redacted]@bacta.org.uk>; [redacted]
Subject: SESOG data

Hi both

Thank you for supplying the data sets for our request.

We wanted to check whether it would be possible to obtain the Bacta data for question 2 in relation to total numbers of individuals who have excluded. We have this data for all the

other schemes and it would be helpful to be in a position to release the figures across the land-based sector.

If you could let me know by tomorrow morning whether this would be possible, that would be great.

Many thanks

GAMBLING COMMISSION

[redacted]

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Great, thanks [redacted] – look forward to meeting you then!

GAMBLING COMMISSION
[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Monday, August 4, 2025 4:24 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted] [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission visit to Blackpool Pier - 12 August 2025

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Hi [redacted]

You can use mine – [redacted] Looking forward to seeing you next Tuesday.

Best,
[redacted]

[redacted]

bacta

From: [redacted]@gamblingcommission.gov.uk>
Sent: 04 August 2025 16:22
To: [redacted]@bacta.org.uk>; [redacted] [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission visit to Blackpool Pier - 12 August 2025

Thanks, [redacted] for confirming the details.

If you could share a phone number of someone who will be there on the day that would be great, just in case we need to get in touch.

Thanks for all your help with organising.

Kind regards,

[redacted]

GAMBLING COMMISSION | [redacted]
www.gamblingcommission.gov.uk
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From: [redacted]@bacta.org.uk>
Sent: Monday, August 4, 2025 3:47 PM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: Gambling Commission visit to Blackpool Pier - 12 August 2025

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

Hi [redacted]

Thank you for your confirmation. From Bacta, [redacted] will be in attendance and joined [redacted] (Blackpool Piers) and a representative from Crown Leisure.

For an itinerary, please meet at the entrance of Blackpool North Pier for 11:30. We are then looking to move on to Blackpool Amusements on the coastline and then hopefully Central Pier at the end of the visit, time permitting. This will give Andrew and yourself a good overview of the premises in the town. I have also passed on your areas of interest to operators, so they will have an understanding of what to expect.

Thank you for your help with this!

Best wishes,

[redacted]

Email: [redacted]@bacta.org.uk
Mobile: [redacted]

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29-30 Ely Place
London EC1N 6TD

From: [redacted]@gamblingcommission.gov.uk>
Sent: 04 August 2025 9:16 AM
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission visit to Blackpool Pier - 12 August 2025

Hi [redacted]

Just a note to confirm that it will be me and Andrew from the Commission attending the visit next week. If you could please get back to me on the questions below when you can, that would be great.

Kind regards,
[redacted]

GAMBLING COMMISSION | [redacted]
www.gamblingcommission.gov.uk

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From: [redacted]
Sent: Wednesday, July 30, 2025 10:31 AM
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission visit to Blackpool Pier - 12 August 2025

Great, thanks [redacted]

You may be planning to include the below details when you send more information, but could I please request that you share the following:

- Who will be in attendance from Blackpool Pier/Bacta? (I'm still coordinating attendance from our end so I will share those details with you shortly)
- Please confirm a meeting point
- A contact number in case we need to reach anyone on the day. My mobile is [redacted]

I've listed some areas of interest below but there is no expectation that the conversation should stick to these areas only, they are just to help guide the conversation if needed. If there is anything you would like to hear more about from our perspective, please let me know and we can incorporate these as well.

1. An overview of your business/facilities
2. How is footfall doing?
3. What challenges is your business facing?
4. How do you ensure that machines meet technical requirements?
5. How do you ensure only licensed/ permitted staff maintain/ repair machines – what staff training is provided?
6. How do you ensure stakes and prizes limits are not exceeded on non-monetary prize machines?
7. How do you ensure it is clear to consumers when a machine is skill or gaming machine (crane machines, skill vs compensated)?
8. How do you identify whether a machine is skill with prizes, cat D or cat C

Kind regards,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
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From: [redacted]@bacta.org.uk>
Sent: Friday, July 25, 2025 11:49 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]@bacta.org.uk>
Subject: Re: Gambling Commission visit to Blackpool Pier - 12 August 2025

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

Hi [redacted]

11:30 works well. We should be able to get confirmed details over next week. Do pass on any areas of interest that we can build into the program.

Best wishes,

[redacted]

Email: [redacted]@bacta.org.uk
Mobile: [redacted]

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29-30 Ely Place
London EC1N 6TD

From: [redacted]@gamblingcommission.gov.uk>
Sent: 24 July 2025 11:41 AM
To: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: RE: Gambling Commission visit to Blackpool Pier - 12 August 2025

Hi [redacted]

Hope all is well. Just looping back on this to confirm timings which are slightly earlier than I had anticipated. Would 11:30am work for you? Andrew will have approximately 2 hours available meaning hopefully we'd be able to cover a couple of the piers.

I can also provide a list of areas of interest if you think this would be useful to help guide the tour/conversation.

Look forward to hearing from you.

Kind regards,
[redacted]

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[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]
Sent: Wednesday, July 16, 2025 10:30 AM
To: [redacted]@bacta.org.uk>; [redacted]

[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission visit to Blackpool Pier - 12 August 2025

Hi [redacted]

Good to hear from you and I'm pleased my email eventually made it through!

No particular preference on which Pier, Andrew will likely have a couple of hours available so it may mean that we can visit more than one of them, however I have never been to Blackpool so I'm not sure what is doable. Happy to leave it with you to coordinate the best option.

We're still finalising other meeting logistics so I can't confirm exact timings just yet but it's still looking likely that availability will be in the afternoon.

Appreciate your help with coordinating this!

Kind regards,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, July 16, 2025 9:13 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: Re: Gambling Commission visit to Blackpool Pier - 12 August 2025

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

Hi [redacted]

Apologies for the delay in getting back to you (your emails had been caught by the filter!).

We are very happy to facilitate Andrew's visit to Blackpool. There are three Piers in Blackpool and we can liaise with each of them- is there a one in particular that you had in mind?

Best wishes

[redacted]

[redacted]

Email: [redacted]@bacta.org.uk

Mobile: [redacted]

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29 30 Ely Place

London EC1N 6TD

From: [redacted]@gamblingcommission.gov.uk>
Sent: 15 July 2025 10:08 AM
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission visit to Blackpool Pier - 12 August 2025

Hi [redacted]

Just following up on the below as I'm conscious the suggested date is fairly soon. As mentioned, if you want to put me in touch with an appropriate contact, I'd be happy to liaise with them directly.

Look forward to hearing from you.

Kind regards,
[redacted]

GAMBLING COMMISSION | [redacted]
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From: [redacted]
Sent: Wednesday, July 9, 2025 9:11 AM
To: [redacted]@bacta.org.uk; [redacted]@bacta.org.uk>
Subject: Gambling Commission visit to Blackpool Pier - 12 August 2025

Hi [redacted]

Hope you are both well.

[redacted] I hope you are settling into your new role at Bacta. I work in the Public Affairs team at the Commission and help to coordinate most of our Executive level industry engagement. The Bacta team have always been very helpful in assisting us with organising various operator visits, and I was hoping that we might be able to request your help again.

Over the last few years, Andrew Rhodes has visited a seaside town during the summer months and this year we are looking at organising a visit to Blackpool Pier. Is this something you would be able to coordinate or alternatively if you'd like to put me in touch with the most appropriate person at the Pier, I'd be happy to liaise with them directly. Andrew will be in Blackpool on the afternoon of Tuesday 12 August; I should be able to confirm exact timings over the next few days.

Look forward to hearing from you.

Kind regards,
[redacted]

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From: [redacted]
[redacted]
Subject: Evaluation of multi-operator self-exclusion
Date: 06 December 2024 16:47:00
Attachments: 18-038856-01-moses-combined-evaluation-report-final-for-publication.pdf
20-091383-01-GamCare-Follow-Up-Study-Report-V4-PUBLIC (1).pdf

---

Hi [redacted]

Thanks again for visiting VSH yesterday. I promised to signpost you to some evaluation of multi-operator self-exclusion that has taken place over the years. Please find attached two reports undertaken by Ipsos Mori on all of the schemes. Please find links to two on GAMSTOP below, the Ipsos one is recent and the Sonnet one from 2021.

Ipsos report (gamstop.co.uk)

https://www.greo.ca/en/greo-resource/resources/Documents/Sonnet-Advisory-and-Impact-2021_-GAMSTOP-Evaluating-online-self-exclusion-scheme.pdf

Have a good weekend and I'll see you in the SESOG meeting on Monday

Kind regards

[redacted]
Gambling Commission

Victoria Square House
Victoria Square
Birmingham
B2 4TP

[redacted]

From: [redacted]
Subject: Suicide reporting
Date: 24 December 2024 13:14:00
Attachments: image002.png

Hi both

I've taken the below from our guidance on suicide reporting, hope it helps, if not I can speak to you on 6th Jan. Have a great Xmas and New Year.

Kind regards
[redacted]

Reporting a death by suicide

You must tell us, as soon as reasonably practicable, if you know or have reasonable cause to suspect that a person who has gambled with you has died by suicide, whether or not such suicide is known or suspected to be associated with gambling.

When reporting this event, you should include the following information:

- the date that the company became aware of the death - use the Date of the notification field to record this
- the person's name
- the person's date of birth
- a summary of the person's gambling activity (to a maximum of 4,500 characters, including spaces).

A summary of the person's gambling activity should include:

- whether the person had an active account with the company
- the period(s) the person gambled with the company
- whether the customer account had been managed in accordance with the company's policies and procedures
- the products the person had gambled upon
- whether the customer was being monitored from a safer gambling perspective
- any customer interactions
- any safer gambling alerts of concern
- any self-exclusion agreements and/or use of gambling management tools.

In addition, it would be helpful if the company could briefly include, where known:

- the person's home address
- the person's email address
- the person's date of death
- how the company became aware of the death
- provide any information in respect of third-party queries received by the company such as from relatives or a Coroner's officer enquiry
- whether any wider internal review of the customer account is or has been carried out by the company
- any further information that the company believes may be relevant in assisting us to determine our next steps.

The upload file function has been disabled for this notification as all information should be provided within the available fields.

If you are unable to provide a person's date of birth, enter the date '01/01/0001' (as it will not be possible to successfully submit the report without completing this field). You should also use the Details field to explain why you are unable to provide a date of birth.

We will record the information received from the company and assess if we need to request any additional material in line with our Licensing, compliance and enforcement policy.

After this notification has been submitted:

- all sensitive[1] information will be redacted
- there will be a reference number displayed within the Detail field, this is for internal purposes only. For any correspondence around this event use the LCCP reference.

This information is to be reported to us via the LCCP notifications part of the eServices digital service (opens in new tab). You must select the following type when entering this LCCP notification on eServices: Death by suicide notification.

From: [redacted]
To: [redacted]
Subject: Re: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot
Date: 18 March 2025 15:07:45
Attachments: image001.png
image002.png

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

Thanks [redacted]

Best wishes.

[redacted]

[redacted]

From: [redacted]gamblingcommission.gov.uk>
Sent: Tuesday, March 18, 2025 3:06:13 PM
To: [redacted]@bacta.org.uk>
Subject: RE: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot

Hi [redacted]

Please see the attached responses to the interview questions.

Can this please be attributed to J[redacted] rather than [redacted]

Kind regards

GAMBLING COMMISSION

[redacted]

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From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 18, 2025 10:42 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Re: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot

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That works - Many thanks!

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, March 18, 2025 10:35:56 AM
To: [redacted]@bacta.org.uk>
Subject: RE: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot

Thanks for confirming.

We have some answers drafted to the below questions, but I'm awaiting sign off before I can send these over.

Would the end of today be the latest?

Kind regards
[redacted]

From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 18, 2025 10:28 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: Fw: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot

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

Hi [redacted]

This was the last communication.

Hope you are still able to help out.

Best wishes.

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 13 February 2025 16:53
To: [redacted]@bacta.org.uk>
Cc: [redacted]
Subject: Re: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot

Hi [redacted]

Sorry for not coming back to you sooner, [redacted] don't think there will be a problem with me doing the article but I have sent it on to our Comms team for consideration. I'm off next week so won't have an answer until the end of Feb but we will be fine to get something to you by 18th March if we are ok to go ahead.

Separately, do you have an agenda drafted yet for the SR Exchange? It would be good to know timings in case I need to nip out for any calls.

Many thanks,

[redacted]

[redacted]

From: [redacted]@bacta.org.uk>
Sent: Wednesday, February 12, 2025 9:34 AM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]
Subject: Bacta Social Responsibility Exchange - Feature/Interview in Coinslot

You don't often get email [redacted]@bacta.org.uk. Learn why this is important

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Hi [redacted]

We are looking forward to hosting you at the Bacta Social Responsibility Exchange on 26 March 2025 in Leeds. I am pleased to report that sign-ups to attend have been healthy.

We were wondering if you would be prepared to participate in a feature/interview in the trade magazine Coinslot to promote the event and help amplify your message.

Please find below a series of questions that have been supplied from Coinslot. The total number of words is 800. Deadline 18 March 2025.

I hope this might be possible. Let me know.

Best wishes.

[redacted]

1. Without giving too much away can you provide an overview of your address/speech at next week's SR Exchange – what are the key points?

2. The majority of Safer Gambling symposia/events focus on policy. So how important is it to have the Bacta SR Exchange which aims to deliver practical knowledge and insight which consumer-facing staff can take back into their venues and share with colleagues?

3. How would you assess the land-based sector's undertakings in respect of delivering effective player protection?

4. Dealing with specifics , where do you think land-based operators' need to raise their game?

5. Do you think Britain leads the way in balancing a healthy land-based industry with effective player protection – if not which country/jurisdiction provides the benchmark for best practice?

6. The Commission recently embarked on a programme of hosted site visits to licensed gambling businesses which has included Bacta member AGCs – how useful has this been?

7. Finally, can you provide an update on the Raising Standards Workshops – how have they progressed, have they been successful and how much of the focus has been on safer gambling/player protection?

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
Mobile: [redacted]
Email: [redacted]r@bacta.org.uk | Web: www.bacta.org.uk

GAMBLING COMMISSION

21 July 2025

Sent by email only

Dear Licensee,

Self-exclusion requirements for adult gaming centre licensees

We are writing to all adult gaming centre (AGC) licensees to remind them of their obligations regarding self-exclusion requirements and to address compliance concerns identified during recent visits.

Licence requirements

All AGCs must have effective processes and procedures in place for customers who wish to self-exclude. These requirements are set out in the Licence Conditions and Codes of Practice (LCCP):

- LCCP Condition 3.5.1 - Non-remote and trading rooms Social Responsibility (SR) code
- LCCP Condition 3.5.2 - Non-remote ordinary code
- LCCP Condition 3.5.6 - Multi-operator non-remote SR code

Multi-operator self-exclusion scheme participation

You must participate in a multi-operator self-exclusion scheme. This requirement has been in place since 2016.

If you are not currently participating, you must join either the Bacta scheme or SmartExclusion immediately. Contact details are set out below:

Victoria Square House
Victoria Square
Birmingham
B2 4BP
T+44 121 230 6666
www.gamblingcommission.gov.uk

GAMBLING COMMISSION

BACTA Scheme Manager

29-30 Ely Place

London

EC1N 6TD

Tel: 020 7730 6444

Email: selfexclusion@bacta.org.uk

SmartExclusion - Boomerang Digital

To sign up to SmartExclusion please call or email:

Tel: 01482 44 11 42 and select option 3

Email: SmartHubSupport@boomerangdigital.co.uk

Web: www.ihlhub.com

These schemes work together to provide a single system that enables customers to self-exclude from areas where they live, work and socialise.

Required procedures and controls

You must ensure that:

- you can accept multi-operator self-exclusion requests from customers
- you have procedures to enable self-exclusion requests and take all reasonable steps to prevent self-excluded customers from gambling across every AGC you operate
- you can effectively identify self-excluded customers
- your staff are appropriately trained to administer self-exclusion and signpost customers to counselling and support services.

Compliance concerns and enforcement action

Recent compliance visits have identified shortcomings in self-exclusion controls and in some cases we have identified operators who do not have required self-exclusion processes in place. In such cases operators can expect that we will consider an immediate suspension of the operating licence. We strongly encourage every AGC operator to proactively review their controls to ensure full compliance.

We have also seen examples of where operators have confirmed to us that they have self-exclusion in place when this has not been the case. Any evidence of misleading the regulator will likely lead to us considering the suitability of any licence holders.

Given the potential for longstanding non-compliance, we will consider enforcement action even if you join a scheme now. We will be taking steps to identify any licensees not participating in a multi-operator scheme.

Reporting requirements

If you do not have the required controls in place, you must report this to the Commission under Licence Condition 15.1.1. Any failure to make such a report will be considered as a further regulatory breach and will be taken into account when considering any regulatory penalties. You must also put measures in place immediately to ensure compliance going forward.

Next steps

Please review your current self-exclusion procedures and ensure you meet all requirements, as a matter of urgency. We will continue to assess self-exclusion controls as part of our ongoing programme of compliance assessments.

If you have any questions regarding these requirements, please contact your allocated Commission contact in the normal way.

Yours Sincerely,

[redacted]

Victoria Square House
Victoria Square
Birmingham
B2 4BP
T+44 121 230 6666
www.gamblingcommission.gov.uk

From: [redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity
Date: 29 May 2025 14:59:00
Attachments: image001.png
image002.png

Hi all,

Just a note to say thank you to you all for hosting us yesterday. I know how much effort goes into preparing for these visits and we appreciate you taking time out of your schedules to accommodate us. I know [redacted] and I found it incredibly useful and interesting to learn more about your business, how you operate and the challenges you face.

Once again, thank you for your time, please do feel free to keep in touch if you have any queries or thoughts, we are always keen to keep engagement open.

Best wishes,
[redacted]

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[redacted]
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From: [redacted]@bacta.org.uk>
Sent: Tuesday, May 20, 2025 4:28 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]bacta.org.uk>
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

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

Hi [redacted]

See below.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 20 May 2025 09:15
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

Morning [redacted]

Hope all is well. I just wanted to check in ahead of the visit to Palace Amusements next week and ask for a couple of details.

- Who will be attending from Palace Amusements/Bacta?

  [redacted]

- Could you please provide a phone number of someone who will be at the visit in case I need to reach them on the day. [redacted]

  [redacted]

- Could you please add [redacted] to the attendee list for the Commission - [redacted] has recently started in the role of [redacted] and will be leading on operational level engagement with the industry.

Noted thanks.

Many thanks,
[redacted]

GAMBLING COMMISSION | [redacted].gov.uk

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From: [redacted]@bacta.org.uk>
Sent: Wednesday, April 30, 2025 2:35 PM
To: [redacted]gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

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

Many thanks [redacted]

That's very useful.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 30 April 2025 13:43
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

Hi all,

Hope all is well. I wanted to share details on who will be attending the visit on 28 May and also some areas of interest. There is no expectation that the conversation should stick to these areas only, but hopefully this will help guide the conversation as you take us around the venue.

GC attendees

[redacted]

Areas of interest

- Given your central London location, can you provide some insight into the demographics of customers?
- What is footfall like?
- Could you please provide an explanation of the different types of machines you have in place and how you meet regulatory requirements in relation to the categories and numbers of machines that are available for use?
- What challenges – if any – is your business facing?
- How do you deal with the challenge of making sure age restrictions are upheld?
- How do you monitor and identify people at risk of gambling harm, and what do you do when you have identified someone in this category?
- How do you identify returning customers who may have self-excluded?
- What training do your staff get around regulatory requirements such as anti-money laundering, safer gambling and customer interaction?
- What impact will the recent NI and minimum wage increases have on your business?

If you could please let me know who will be attending from your side that would be great. If you need anything further at this stage, please let me know.

Kind regards,

[redacted]

GAMBLING COMMISSION

[redacted]

www.gamblingcommission.gov.uk

Making gambling safer, fairer and crime free

Great Place To Work. Certified NOV 2024-NOV 2025 UK

From: [redacted]@bacta.org.uk>
Sent: Friday, April 11, 2025 2:30 PM

To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>;
[redacted]
Subject: Re: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

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

Hi [redacted]

Just confirming that time works for us and the venue.

Best wishes.

[redacted]

[redacted]
[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, April 8, 2025 4:52:21 PM
To: [redacted]@bacta.org.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>;
[redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

Hi [redacted],

Thank you for your suggestion and for being open to accommodating the visit.

Would **3-4pm** on **28 May** work for you - if you think more than 60 minutes will be needed, we have some room to be flexible. I am currently coordinating attendance but there will likely be 4-5 people attending in total.

As mentioned in my email below, this would be an opportunity for [redacted] and Commissioners to have a tour of your premises and learn more about your business. We typically provide some areas of interest in advance to help guide the conversation if needed, so I can share those with you as well if helpful.

Look forward to hearing from you.

Kind regards,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]@bacta.org.uk>
Sent: Tuesday, April 8, 2025 2:00 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

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

Hi [redacted]

For the visit on Wednesday 28 May 2025 between 2pm and 4pm, we would suggest the following venue:

Palace Amusements
310-312 Caledonian Road
N1 1BB Islington, London, GB
Palace Amusements – Islington - Palace Amusements

The company contact is [redacted]

Best wishes.

[redacted]

[redacted]
Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted] <[redacted]@gamblingcommission.gov.uk>
Sent: 08 April 2025 11:20

To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

Hi [redacted]

Just wanted to circle back here to see if you had any update as it would be good to get this confirmed in Commissioners diaries.

Kind regards,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]@bacta.org.uk>
Sent: Tuesday, March 25, 2025 9:34 AM
To: [redacted]@gamblingcommission.gov.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

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

Hi [redacted]

We'd be delighted to host a visit.

I'll get back with a proposal asap.

Best wishes.

[redacted]

[redacted]

Bacta | 29-30 Ely Place | London EC1N 6TD
[redacted]
[redacted]@bacta.org.uk | Web: www.bacta.org.uk

From: [redacted]@gamblingcommission.gov.uk>
Sent: 24 March 2025 12:49
To: [redacted]@bacta.org.uk>; [redacted]
[redacted]@bacta.org.uk>
Subject: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

Hi [redacted]

Hope you are both well. I am reaching out in the hope that I might be able to request your assistance again with organising a visit opportunity to an AGC for the Commission's Interim Chair, [redacted] alongside some of our other Commissioners.

They currently have some other commitments in central London on **Wednesday 28 May** so it would be ideal if we could coordinate something on that day between the hours of 2pm-4pm. As with previous visits, it would be an opportunity for colleagues to have a tour of the premises and learn more about the business.

As much as we are grateful to Admiral and Merkur for hosting visits over the last year or so, we thought this may be an opportunity to visit a different licensee who we may have had less engagement with, however I am happy to be led by you and what might be appropriate options for that date and location.

Look forward to hearing from you.

Kind regards,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from indicating that you are not the intended recipient and delete it from your system. Do not copy, distribute or take action based on this email. Freedom of Information requests can be submitted either by email (FOI@gamblingcommission.gov.uk) or by writing to: FOI request Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Please

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: RE: Gambling Commission Interim Chair and Commissioners AGC visit opportunity
Date: 14 April 2025 09:25:00
Attachments: image001.png
image002.png

Hi [redacted]

Wonderful, thank you very much.

I'll circle back shortly with names of those attending and also a list of any areas of interest.

Kind regards,
[redacted]

GAMBLING COMMISSION
[redacted]
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]@bacta.org.uk>
Sent: Friday, April 11, 2025 2:30 PM
To: [redacted]@gamblingcommission.gov.uk>
Cc: [redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>; [redacted]
Subject: Re: Gambling Commission Interim Chair and Commissioners AGC visit opportunity

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

Hi [redacted]

Just confirming that time works for us and the venue.

Best wishes.

[redacted]

[redacted]

From: [redacted]@gamblingcommission.gov.uk>

Figures shown are for the dates between 2024-07-01 and 2024-09-30

ExclusionCount

7
68
89
52
42
13

ExclusionCount

51
218
2

ExclusionCount

37
8
17
37
26
33
39
50
14
10

BreachCount

10

TotalExtensions

16

IndividualBreachCount

37

ExclusionCount

258
2
4
1
1
1
1

1
1
1

TotalReinstatements

498
1493

AgeRange
18-24
25-34
35-44
45-54
55-64
65+

Gender
Female
Male
Other

Region
:N/A
East Midlands
East of England
London
North East
North West
South East
South West
West Midlands
Yorkshire and The Humber

BreachType
Attempted

TotalBreachCount
50

Km
1
8
10
15
16
20
25

30
50
800

ReinstatementProcessingType
CustomerRequestedReinstatement
AutoReinistatement

Figures shown are for the dates between 2024-09-30 and 2024-12-31

ExclusionCount

18
83
100
57
44
16

ExclusionCount

61
257
0

ExclusionCount

42
15
23
25
39
40
41
59
13
21

BreachCount

25

TotalExtensions

20

IndividualBreachCount

19

ExclusionCount

310
1
1
2
1
2
1

TotalReinstatements

749

1875

AgeRange
18-24
25-34
35-44
45-54
55-64
65+

Gender
Female
Male
Other

Region
:N/A
East Midlands
East of England
London
North East
North West
South East
South West
West Midlands
Yorkshire and The Humber

BreachType
Attempted

TotalBreachCount
25

Km
1
40
45
50
80
500
600

ReinstatementProcessingType
CustomerRequestedReinstatement
AutoReinistatement

Figures shown are for the dates between 2024-04-01 and 2025-03-31

ExclusionCount

59
276
377
256
187
69

ExclusionCount

244
974
6

ExclusionCount

188
49
71
156
122
151
166
206
51
64

BreachCount

206

TotalExtensions

91

IndividualBreachCount

143

ExclusionCount

1
5
1167
1
1
3
5

4
3
1
1
1
2
2
2
1
7
1
3
2
1
1
1
1
3
1
1
2

TotalReinstatements

2664
6875

AgeRange
18-24
25-34
35-44
45-54
55-64
65+

Gender
Female
Male
Other

Region
:N/A
East Midlands
East of England
London
North East
North West
South East
South West
West Midlands
Yorkshire and The Humber

BreachType
Attempted

TotalBreachCount
206

Km
0.25
0.5
1
4
5
8
10

15
16
20
24
25
30
35
40
45
50
55
80
100
130
170
200
250
500
600
800
1000

ReinstatementProcessingType

CustomerRequestedReinstatement

AutoReinistatement

Figures shown are for the dates between 2025-01-01 and 2025-03-31

ExclusionCount

18
65
99
77
54
21

ExclusionCount

67
267
0

ExclusionCount

58
14
17
45
31
40
39
59
15
16

BreachCount

15

TotalExtensions

16

IndividualBreachCount

13

ExclusionCount

323
1
1
1
1
1
1

1
1
1
2

TotalReinstatements

931
2135

AgeRange
18-24
25-34
35-44
45-54
55-64
65+

Gender
Female
Male
Other

Region
:N/A
East Midlands
East of England
London
North East
North West
South East
South West
West Midlands
Yorkshire and The Humber

BreachType
Attempted

TotalBreachCount
15

Km
1
4
8
10
24
55
100

130
170
250
1000

ReinstatementProcessingType

CustomerRequestedReinstatement

AutoReinistatement

B2C Remote Assurance Statement 2025

(To cover the period **//**** - **/**/****)**

Operator Name:
Licence Number:
Assurance Statement
Date:

DRAFT

Question number	Statement	Yes/No	If no, what do you need to do to achieve compliance	When do you expect to achieve compliance	Additional comments if applicable (No evidence required)
1	Are you assured that your PML holders have the relevant knowledge, training and experience to fulfil their senior role?				
2	Are you assured that your staff are trained appropriately on the legal requirements and business policies and procedures for Customer Interaction?				
3	Are you assured that your customer interaction				

	procedures meet the requirements set out in SR Code 3.4.3? We have consistently identified concerns in relation to Paragraphs 4, 7, 8, 11, 12 & 13 so while we are seeking assurance on the entirety of 3.4.3, we ask for particular focus on those areas.				
4	Are you assured your self-exclusion procedures take all reasonable steps to prevent individuals who have self-excluded from gambling. This refers to both your own scheme and GAMSTOP?				
5	Are you assured that as soon as practicable, you are taking all reasonable steps to prevent any marketing material being sent to a self-excluded customer?				

DRAFT

6	Are you assured that your Anti-Money Laundering and Counter Terrorist Financing Risk Assessment is appropriate to your business?				
7	Are you assured that your AML procedures are being implemented correctly and your staff understand their role in this process?				
8	Are you assured that you have carried out adequate due diligence on your third-party partners who are involved in providing the gambling activity that you offer, for example white labels partners, in order to minimise the risk to the licensing objectives?				
9	Are you assured that your terms and conditions are fair and transparent?				
10	Are you assured that your processes for customers to withdraw money from their gambling account, do not				

DRAFT

	place any unfair restrictions on customers?				
11	Are you assured that your marketing and advertising of gambling products and services is undertaken in a socially responsible manner and is compliant with CAP & BCAP codes?				
12	Are you assured that customer funds are held in a separate client bank account or accounts?				
13	If there are other areas of your business that you believe may not have been compliant during this period, please set these out here, along with the actions you are taking to bring these areas into compliance and within what period of time.				
14. Please can you explain how your board has received assurances from the business in these areas? (max 2,000 words, see guidance for details)					

DRAFT

Signed by:

CEO signature:……

CEO name:……

Chair signature:……

Chair name:……

Director signature:……

Director name:……

Director signature:……

Director name:……

Non-Exec Director signature:……

Non-Executive Director name:……

DRAFT

Further Information

This year we have made some slight amendments to the previous assurance statement that was circulated in 2023. Within the previous template we listed broad areas where we had identified concerns, where possible in this year's template we have tried to be more specific and transparent on what these areas are. Again, if you are able to provide assurance in the areas set out, you can simply confirm that you and your Board are assured of your business's compliance. We expect that you will be able to do this through oversight and discussion of the key issues and actions under consideration within, for example, your Audit and Risk Committee, your Compliance Committee, your Safer Gambling Committee or their equivalents.

We do not require you to evidence your level of assurance. This is because we will check when we conduct an assessment or piece of thematic project work, which may focus specifically on one of these areas of assurance. If we do not find evidence to support your assurance, we will seek to understand how you were able previously to make an unqualified statement of assurance within this document. During the assessment we will test the responses you have provided in your assurance statement against your procedures and the outcomes these produce. If any inconsistencies are identified, we will explore these further.

If you are not assured as to your current level of compliance, then we expect you to tell us so. We also expect you to set out any actions you are taking to bring your business into compliance in the specified area and how long you expect that to take.

If currently, or within this period, you have been in contact with the Commissions Compliance or Enforcement departments in relation to any of the areas listed in the above statements, you should indicate this in the comment box.

The layout of the template above is purely indicative. If you would like to say more in answering any of the statements then please feel free to expand the template to accommodate your text.

This assurance statement should be signed by all members of your Board – CEO, Chair, Executive Directors and Non-Executive Directors. This way we can see that the entire Board is assured about the compliance of your business in the key areas we have set out. We have left a number of spaces for signature by your Board members but please feel free to extend these to incorporate the signatures of all members. If your Board is not comprised of people with these titles, please amend the titles below to reflect the titles of your Board members. For clarity these signatures can be electronic.

DRAFT

B2C Non-Remote Assurance Statement 2025

(To cover the period **//**** - **/**/****)**

Operator Name:
Licence Number:
Assurance Statement Date:

DRAFT

Question number	Statement	Yes/No	If no, what do you need to do to achieve compliance	When do you expect to achieve compliance	Additional comments if applicable (No evidence required)
1	Are you assured that your PML holders have the relevant knowledge, training and experience to fulfil their senior role?				
2	Are you assured that your staff are trained appropriately on the legal requirements and business policies and procedures for customer interaction?				

3	Are you assured that your customer interaction procedures are identifying customers who may be at risk or are experiencing gambling harm?				
4	Are you assured that your customer interaction procedures ensure you are interacting with customers who may be at risk of or are experiencing harms associated with gambling?				
5	Are you assured that you have processes in place which ensure that you are evaluating the impact of the interactions you are having with your customers and the effectiveness of your approach?				
6	Are you assured your self-exclusion procedures take all reasonable steps to prevent individuals who have self-excluded from gambling? This refers to both your own scheme and				

DRAFT

	the multi-operator scheme you are participating in.				
7	Are you assured that as soon as practicable, you are taking all reasonable steps to prevent any marketing material being sent to a self-excluded customer?				
8	Are you assured that your Anti-Money Laundering and Counter Terrorist Financing Risk Assessment is appropriate to your business?				
9	Are you assured that your AML procedures are being implemented correctly and your staff understand their role in this process?				
10	Are you assured that your terms and conditions are fair and transparent?				
11	Are you assured that your payout processes do not place any unfair restrictions on customers?				

DRAFT

12	Are you assured that your marketing and advertising of gambling products and services is undertaken in a socially responsible manner and is compliant with CAP & BCAP codes?				
13	If there are other areas of your business that you believe may not have been compliant during this period, please set these out here, along with the actions you are taking to bring these areas into compliance and within what period of time.				
14. Please can you explain how your board has received assurances from the business in these areas? (max 2,000 words, see guidance for details)					

DRAFT

Signed by:

CEO signature:……

CEO name:……

Chair signature:……

Chair name:……

Director signature:……

Director name:……

Director signature:……

Director name:……

Non-Exec Director signature:……

Non-Executive Director name:……

DRAFT

Further Information

This year we have made some slight amendments to the previous assurance statement that was circulated in 2023. Within the previous template we listed broad areas where we had identified concerns, where possible in this year's template we have tried to be more specific and transparent on what these areas are. Again, if you are able to provide assurance in the areas set out, you can simply confirm that you and your Board are assured of your business's compliance. We expect that you will be able to do this through oversight and discussion of the key issues and actions under consideration within, for example, your Audit and Risk Committee, your Compliance Committee, your Safer Gambling Committee or their equivalents.

We do not require you to evidence your level of assurance. This is because we will check when we conduct an assessment or piece of thematic project work, which may focus specifically on one of these areas of assurance. If we do not find evidence to support your assurance, we will seek to understand how you were able previously to make an unqualified statement of assurance within this document. During the assessment we will test the responses you have provided in your assurance statement against your procedures and the outcomes these produce. If any inconsistencies are identified, we will explore these further.

If you are not assured as to your current level of compliance, then we expect you to tell us so. We also expect you to set out any actions you are taking to bring your business into compliance in the specified area and how long you expect that to take.

If currently, or within this period, you have been in contact with the Commissions Compliance or Enforcement departments in relation to any of the areas listed in the above statements, you should indicate this in the comment box.

The layout of the template above is purely indicative. If you would like to say more in answering any of the statements then please feel free to expand the template to accommodate your text.

This assurance statement should be signed by all members of your Board – CEO, Chair, Executive Directors and Non-Executive Directors. This way we can see that the entire Board is assured about the compliance of your business in the key areas we have set out. We have left a number of spaces for signature by your Board members but please feel free to extend these to incorporate the signatures of all members. If your Board is not comprised of people with these titles, please amend the titles below to reflect the titles of your Board members. For clarity these signatures can be electronic.

DRAFT

B2B Assurance Statement 2025

(To cover the period **//**** - **/**/****)**

Operator Name:
Licence Number:
Assurance Statement
Date:

Question number	Statement	Yes/No	If no, what do you need to do to achieve compliance	When do you expect to achieve compliance	Additional comments if applicable (No evidence required)
1	Are you assured that internal commercial targets do not have a negative impact on the requirement to protect vulnerable people when designing and producing any software or products?				
2	Are you assured that you have carried out adequate due diligence on your third-party partners who are involved in providing the gambling activity that you offer, for example your B2C partners, in order to minimise the risk to the licensing objectives?				
3	Are you assured that the software and products you offer are fair and				

DRAFT

	enable the average consumer to understand the rules of any games produced?				
4	Are you assured that your marketing and advertising of gambling products and services is undertaken in a socially responsible manner and is compliant with CAP & BCAP codes?				
5	Are you assured that your PML holders have the relevant knowledge, training and experience to fulfil their senior role?				
6	Are you assured that your products are compliant with the Remote Technical Standards?				
7	If there are other areas of your business that you believe may not have been compliant during this period, please set these out here, along with the actions you are taking to bring these areas into compliance and within what period of time.				
8. Please can you explain how your board have received assurances from the business in these areas? (max 2,000 words, see guidance for details)					

DRAFT

Signed by:

CEO signature:……

CEO name:……

Chair signature:……

Chair name:……

Director signature:……

Director name:……

Director signature:……

Director name:……

Non-Exec Director signature:……

Non-Executive Director name:……

DRAFT

Further Information

This year we have made some slight amendments to the previous assurance statement that was circulated in 2023. Within the previous template we listed broad areas where we had identified concerns, where possible in this year's template we have tried to be more specific and transparent on what these areas are. Again, if you are able to provide assurance in the areas set out, you can simply confirm that you and your Board are assured of your business's compliance. We expect that you will be able to do this through oversight and discussion of the key issues and actions under consideration within, for example, your Audit and Risk Committee, your Compliance Committee, your Safer Gambling Committee or their equivalents.

We do not require you to evidence your level of assurance. This is because we will check when we conduct an assessment or piece of thematic project work, which may focus specifically on one of these areas of assurance. If we do not find evidence to support your assurance, we will seek to understand how you were able previously to make an unqualified statement of assurance within this document. During the assessment we will test the responses you have provided in your assurance statement against your procedures and the outcomes these produce. If any inconsistencies are identified, we will explore these further.

If you are not assured as to your current level of compliance, then we expect you to tell us so. We also expect you to set out any actions you are taking to bring your business into compliance in the specified area and how long you expect that to take.

If currently, or within this period, you have been in contact with the Commissions Compliance or Enforcement departments in relation to any of the areas listed in the above statements, you should indicate this in the comment box.

The layout of the template above is purely indicative. If you would like to say more in answering any of the statements then please feel free to expand the template to accommodate your text.

This assurance statement should be signed by all members of your Board – CEO, Chair, Executive Directors and Non-Executive Directors. This way we can see that the entire Board is assured about the compliance of your business in the key areas we have set out. We have left a number of spaces for signature by your Board members but please feel free to extend these to incorporate the signatures of all members. If your Board is not comprised of people with these titles, please amend the titles below to reflect the titles of your Board members. For clarity these signatures can be electronic.

DRAFT

GAMBLING COMMISSION

B2C Remote Assurance Statement 2025

(To cover the period 06/04/2024 - 05/04/2025)

Operator Name:
Licence Number:
Assurance Statement date:

Question number	Statement	Yes/No	If no, what do you need to do to achieve compliance	When do you expect to achieve compliance	Additional comments if applicable (No evidence required)
1	Are you assured that your PML holders have the relevant knowledge, training and experience to fulfil their senior role?				
2	Are you assured that your staff are trained appropriately on the legal requirements and business policies and procedures for Customer Interaction?				
3	Are you assured that your customer interaction				

	procedures meet the requirements set out in SR Code 3.4.3? We have consistently identified concerns in relation to Paragraphs 4, 7, 8, 11, 12 & 13 so while we are seeking assurance on the entirety of 3.4.3, we ask for particular focus on those areas.				
4	Are you assured your self-exclusion procedures take all reasonable steps to prevent individuals who have self-excluded from gambling. This refers to both your own scheme and GAMSTOP?				
5	Are you assured that as soon as practicable, you are taking all reasonable steps to prevent any marketing material being sent to a self-excluded customer?				

6	Are you assured that your Anti-Money Laundering and Counter Terrorist Financing Risk Assessment is appropriate to your business?				
7	Are you assured that your AML procedures are being implemented correctly and your staff understand their role in this process?				
8	Are you assured that you have carried out adequate due diligence on your third-party partners who are involved in providing the gambling activity that you offer, for example white labels partners, in order to minimise the risk to the licensing objectives?				
9	Are you assured that your terms and conditions are fair and transparent?				
10	Are you assured that your processes for customers to withdraw money from their gambling account, do not				

	place any unfair restrictions on customers?				
11	Are you assured that your marketing and advertising of gambling products and services is undertaken in a socially responsible manner and is compliant with CAP & BCAP codes?				
12	Are you assured that customer funds are held in a separate client bank account or accounts?				
13	If there are other areas of your business that you believe may not have been compliant during this period, please set these out here, along with the actions you are taking to bring these areas into compliance and within what period of time.				
14. Please can you explain how your board has received assurances from the business in these areas? (max 2,000 words, see guidance for details)					

Signed by:

CEO/Managing Director signature: …….

CEO/Managing Director name: …….

Chair signature: ……

Chair name: ……

Further Information

This year we have made some slight amendments to the previous assurance statement template that was circulated in 2023. Within the previous template we listed broad areas where we had identified concerns, where possible in this year's template we have tried to be more specific and transparent on what these areas are. Again, if you can provide assurance in the areas set out, you can simply confirm that the business has received assurance in the areas highlighted within the template. We expect that you will be able to do this through oversight and discussion of the key issues and actions under consideration within, for example, your Audit and Risk Committee, your Compliance Committee, your Safer Gambling Committee or their equivalents.

Rather than provide evidence, we are seeking information which explains how your board has received assurances from the business in the areas set out in the template. We will check when we conduct an assessment or piece of thematic project work, which may focus specifically on one of these areas of assurance. During the assessment, we will test the responses you have provided in your assurance statement against your procedures and the outcomes these produce. If any inconsistencies are identified, we will explore these further.

If you are not assured as to your current level of compliance, then we expect you to tell us so. We also expect you to set out any actions you are taking to bring your business into compliance in the specified area and how long you expect that to take.

If currently, or within this period, you have been in contact with the Commissions Compliance or Enforcement departments in relation to any of the areas listed in the above statements, you should indicate this in the comment box.

The statement should be signed by the Chair of the board and the CEO/Managing Director. These positions should hold a Personal Management Licence, in line with paragraph 2 a and b of Licence Condition 1.2.1 - Specified management offices. If you wish, please feel free to add additional board member sign off. For clarity these signatures can be electronic.

The layout of the template is purely indicative. If you would like to say more in answering any of the statements, then please feel free to expand the template to accommodate your text.

GAMBLING COMMISSION

B2C Non-Remote Assurance Statement 2025

(To cover the period 06/04/2024 - 05/04/2025)

Operator Name:
Licence Number:
Assurance Statement date:

Question number	Statement	Yes/No	If no, what do you need to do to achieve compliance	When do you expect to achieve compliance	Additional comments if applicable (No evidence required)
1	Are you assured that your PML holders have the relevant knowledge, training and experience to fulfil their senior role?				
2	Are you assured that your staff are trained appropriately on the legal requirements and business policies and procedures for customer interaction?				

3	Are you assured that your customer interaction procedures are identifying customers who may be at risk or are experiencing gambling harm?				
4	Are you assured that your customer interaction procedures ensure you are interacting with customers who may be at risk of or are experiencing harms associated with gambling?				
5	Are you assured that you have processes in place which ensure that you are evaluating the impact of the interactions you are having with your customers and the effectiveness of your approach?				
6	Are you assured your self-exclusion procedures take all reasonable steps to prevent individuals who have self-excluded from gambling? This refers to both your own scheme and				

	the multi-operator scheme you are participating in.				
7	Are you assured that as soon as practicable, you are taking all reasonable steps to prevent any marketing material being sent to a self-excluded customer?				
8	Are you assured that your Anti-Money Laundering and Counter Terrorist Financing Risk Assessment is appropriate to your business?				
9	Are you assured that your AML procedures are being implemented correctly and your staff understand their role in this process?				
10	Are you assured that your terms and conditions are fair and transparent?				
11	Are you assured that your payout processes do not place any unfair restrictions on customers?				

12	Are you assured that your marketing and advertising of gambling products and services is undertaken in a socially responsible manner and is compliant with CAP & BCAP codes?				
13	If there are other areas of your business that you believe may not have been compliant during this period, please set these out here, along with the actions you are taking to bring these areas into compliance and within what period of time.				
14. Please can you explain how your board has received assurances from the business in these areas? (max 2,000 words, see guidance for details)					

Signed by:

CEO/Managing Director signature: …….

CEO/Managing Director name: …….

Chair signature: ……

Chair name: ……

Further Information

This year we have made some slight amendments to the previous assurance statement template that was circulated in 2023. Within the previous template we listed broad areas where we had identified concerns, where possible in this year's template we have tried to be more specific and transparent on what these areas are. Again, if you can provide assurance in the areas set out, you can simply confirm that the business has received assurance in the areas highlighted within the template. We expect that you will be able to do this through oversight and discussion of the key issues and actions under consideration within, for example, your Audit and Risk Committee, your Compliance Committee, your Safer Gambling Committee or their equivalents.

Rather than provide evidence, we are seeking information which explains how your board has received assurances from the business in the areas set out in the template. We will check when we conduct an assessment or piece of thematic project work, which may focus specifically on one of these areas of assurance. During the assessment, we will test the responses you have provided in your assurance statement against your procedures and the outcomes these produce. If any inconsistencies are identified, we will explore these further.

If you are not assured as to your current level of compliance, then we expect you to tell us so. We also expect you to set out any actions you are taking to bring your business into compliance in the specified area and how long you expect that to take.

If currently, or within this period, you have been in contact with the Commissions Compliance or Enforcement departments in relation to any of the areas listed in the above statements, you should indicate this in the comment box.

The statement should be signed by the Chair of the board and the CEO/Managing Director. These positions should hold a Personal Management Licence, in line with paragraph 2 a and b of Licence Condition 1.2.1 - Specified management offices. If you wish, please feel free to add additional board member sign off. For clarity these signatures can be electronic.

The layout of the template is purely indicative. If you would like to say more in answering any of the statements, then please feel free to expand the template to accommodate your text.

GAMBLING COMMISSION

B2B Assurance Statement 2025

(To cover the period 06/04/2024 - 05/04/2025)

Operator Name:
Licence Number:
Assurance Statement date:

Question number	Statement	Yes/No	If no, what do you need to do to achieve compliance	When do you expect to achieve compliance	Additional comments if applicable (No evidence required)
1	Are you assured that internal commercial targets do not have a negative impact on the requirement to protect vulnerable people when designing and producing any software or products?				
2	Are you assured that you have carried out adequate due diligence on your third-party partners who are involved in providing the gambling activity that you offer, for example your B2C partners, in order to minimise the risk to the licensing objectives?				
3	Are you assured that the software and products you offer are fair and enable the average consumer to				

	understand the rules of any games produced?				
4	Are you assured that your marketing and advertising of gambling products and services is undertaken in a socially responsible manner and is compliant with CAP & BCAP codes?				
5	Are you assured that your PML holders have the relevant knowledge, training and experience to fulfil their senior role?				
6	Are you assured that your products are compliant with the Remote Technical Standards?				
7	If there are other areas of your business that you believe may not have been compliant during this period, please set these out here, along with the actions you are taking to bring these areas into compliance and within what period of time.				
8. Please can you explain how your board have received assurances from the business in these areas? (max 2,000 words, see guidance for details)					

Signed by:

CEO/Managing Director signature: ……

CEO/Managing Director name: ……

Chair signature: ……

Chair name: ……

Further Information

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The layout of the template is purely indicative. If you would like to say more in answering any of the statements, then please feel free to expand the template to accommodate your text.

From: [redacted]
To: [redacted]
Subject: RE: SESOG data
Date: 13 June 2025 10:06:00
Attachments: image001.png
image002.png
image003.png

Hi [redacted]

Yes, 2.00pm works fine for me, I'll send you a Teams invite.

Kind regards

[redacted]
GAMBLING COMMISSION
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]@bacta.org.uk>
Sent: Friday, June 13, 2025 10:00 AM
To: [redacted]@gamblingcommission.gov.uk>
Subject: RE: SESOG data

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

Hi [redacted]

Sorry I didn't get back to you yesterday.

Can you do 2.00pm today?

Best wishes

[redacted]

From: [redacted]@gamblingcommission.gov.uk>
Sent: 12 June 2025 14:11
To: [redacted]@bacta.org.uk>
Subject: FW: SESOG data

Hi [redacted]

If you have time for a short chat over Teams about this tomorrow, my day is pretty free.

Kind regards

[redacted]
GAMBLING COMMISSION
www.gamblingcommission.gov.uk
Making gambling safer, fairer and crime free

From: [redacted]
Sent: Tuesday, June 10, 2025 8:58 AM

[redacted]@bacta.org.uk>; [redacted]@bacta.org.uk>
Subject: SESOG data

[redacted] and [redacted]

For the breach data points that we collect, please would you confirm which figures relate to these two questions:

Question 3a. Total number of attempted breaches (tried to get in the door and/or website but were stopped and/or didn't gamble)

Total number of attempted breaches of self-exclusion, where they were successfully identified trying to get into the premises and/or website or gained entry to the premises and/or website but were turned away prior to being able to gamble, during the reporting period (report number of breaches, not individuals). GAMSTOP will report the total number of log in attempts.

Question 3b. Total number of full breaches (gained entry to premises and/or website and gambled)

Total number of full breaches of self-exclusion, where they gained entry to the gambling premises and/or website and were able to gamble, during the reporting period (report number of breaches, not individuals).

Is the response to question 3a [redacted] and the response to question 3b [redacted]

Many thanks for confirming.

Regards

27				
28	**BreachCount**		**BreachType**	
29		10	Attempted	
30				
31	**TotalExtensions**			
32		16		
33				
34	**IndividualBreachCount**		**TotalBreachCount**	
35		37		50
36				

[redacted]
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