

Library Briefing

Online Gambling: Problem Gamblers and the Multi-Operator Self Exclusion Scheme

Summary

On 23 November 2017, the House of Lords is scheduled to debate a motion moved by Lord Browne of Belmont (Democratic Unionist Party) on the "challenges facing problem gamblers, specifically with respect to online gambling, and of the Multi-Operator Self Exclusion Scheme about to be introduced to help online gamblers".

According to the Gambling Commission, Great Britain now has the largest regulated online gambling market in the world. In the period October 2015—September 2016, the remote gambling sector generated a gross gambling yield, defined as the amount retained by operators after the payment of winnings but before the deduction of costs, of £4.5 billion. (Remote gambling is defined as gambling in which persons participate by the use of remote communication, mainly the internet). This represented a 32 percent market share of the gambling industry as a whole, which generated £13.8 billion over the period.

The latest official estimates are that 63 percent of adults (aged 16 and over) in Great Britain had gambled in the most recent year surveyed. Problem gamblers—defined as those who gamble to a degree that compromises, disrupts or damages family, personal or recreational pursuits—were estimated to comprise 0.8 percent of the adult population, with such individuals far more likely to be men than women. This translates to an estimated 430,000 problem gamblers in Great Britain in 2015, with a further 2 million having been deemed 'at risk' of problem gambling. Elsewhere in the UK, problem gambling has been estimated to affect 2.3 percent of the adult population in Northern Ireland—a higher proportion than in England, Scotland or Wales.

Concerns have been raised by the Gambling Commission, as the responsible regulator, and others about the potential for problematic gambling behaviours to develop now that online gambling is readily available at any time to those with a device and an internet connection. However, the Commission and others have also contended that technological advances could be utilised to protect consumers by helping to control problematic behaviour. An online multi-operator self-exclusion scheme is scheduled to be in place by 2018 to allow problem gamblers to self-exclude from all online operators via a single website, rather than having to self-exclude from all online operators separately.

Table of Contents

- I. Overview
- 2. Background
- 3. Prevalence of Gambling Behaviours
- 4. Challenges Facing Problem Gamblers
- 5. Multi-Operator Self Exclusion Scheme
- 6. Recent Developments
- 7. Further Information

Table of Contents

I. Overview	I
2. Background	1
2.1 Regulatory Context	I
2.2 Remote Gambling's Position in the Gambling Industry	3
3. Prevalence of Gambling Behaviours	5
3.1 Gambling	5
3.2 Problem Gambling	8
4. Challenges Facing Problem Gamblers	11
5. Multi-Operator Self Exclusion Scheme	15
6. Recent Developments	17
6.1 Government Policy	17
6.2 Gambling Commission	19
7. Further Information	22

I. Overview

Gambling has become an increasingly popular leisure activity in the United Kingdom in recent years, with consistent growth noted across the gambling industry as a whole—Great Britain now has the largest regulated online gambling market in the world with around 21 million active accounts. However, concerns have been raised by stakeholders including the Government, the Gambling Commission and academics over levels of problem gambling in all parts of the UK since the advent of technological changes that have allowed individuals to gamble online using computers and handheld devices, often in the privacy of their own home and at any hour of the day.²

This briefing provides background information on how gambling is regulated in the UK and the size of the domestic gambling sector. It then examines the prevalence of gambling behaviours, including problem gambling; some of the challenges faced by problem gamblers; and the forthcoming online multi-operator self-exclusion scheme which is due to be in place by 2018. The briefing concludes by providing information on recent developments regarding government policy and regulatory enforcement.

2. Background

2.1 Regulatory Context

The Gambling Act 2005 provides the basis for the regulation of gambling in Great Britain, which remains largely a reserved matter (with the exception of Northern Ireland).³ The Act established the Gambling Commission, an independent non-departmental public body sponsored by the Department for Digital, Culture, Media and Sport, which regulates commercial gambling in England, Scotland and Wales in partnership with licensing authorities.⁴ The Gambling Commission regulates the National Lottery throughout the UK under the National Lottery etc Act 1993.⁵

Gambling Commission, <u>Industry Statistics: April 2013 to March 2016—Updated to include October 2015 to September 2016</u>, May 2017, pp 3–4; and Gambling Commission, <u>Annual Report and Accounts 2016/17</u>, 4 July 2017, p 10.

² Gambling Commission, 'Gambling Participation and Problem Gambling', accessed
9 November 2017. See also, for example, Sian Griffiths, 'Is Gambling a Public Health Issue?',
BMJ Opinion, 28 September 2017.

³ For example, schedule 5 of the Scotland Act 1998, as amended, includes "betting, gaming and lotteries" as a matter reserved to the UK Parliament.

⁴ Gambling Commission, 'About Us', accessed 9 November 2017. The Commission does not regulate spread betting. This is the responsibility of the Financial Conduct Authority (Gambling Commission, <u>Gambling Participation in 2016: Behaviour, Awareness and Attitudes (Annual Report)</u>, February 2017, p 5).

⁵ Gambling Commission, 'About Us', accessed 9 November 2017. For further information on statutory provisions relating to the National Lottery, see Gambling Commission, 'National Lottery Statutory Framework', accessed 9 November 2017.

In Northern Ireland, gambling activity (other than the National Lottery) is regulated by the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985. However, the Department for Communities in Northern Ireland has stated that the 1985 Order is "old and complex and has not kept pace with emerging technologies and other changes". For example, the regime does not make provision for remote gambling. The Department has stated that whilst the Order "does not specifically provide for the licensing of online gambling activities [...] It should be noted that nothing in the 1985 Order would prevent a Northern Ireland resident from taking part in internet gambling as a player". But such online gambling must be with a licenced operator. The Gambling (Licensing and Advertising) Act 2014 created an offence of advertising unlicensed remote gambling in Northern Ireland. The Department for Communities has further noted that a "high-level, strategic review of gambling policy, practice and law is underway" in the province.

Gambling operators in Great Britain require a licence from the Gambling Commission to provide services to consumers. Prior to 2014, only remote gambling operators with equipment located in Great Britain required a licence from the Commission. The Gambling (Licensing and Advertising) Act 2014 brought offshore online gambling operators within scope of the Commission's regulatory regime for the first time. This meant that from 2014, business owners who provide facilities for remote gambling by consumers in Great Britain (whether online or through other means such as telephone), or who advertise to consumers in Great Britain, have needed to hold a licence from the Commission. The Commission takes enforcement action against unlicensed providers of online gambling services, including

⁶ Gambling is a transferred matter for the purposes of the Northern Ireland Act 1998 (Department for Culture, Media and Sport, <u>Gambling (Licensing and Advertising) Act 2014: Explanatory Notes</u>, 14 May 2014, p 3).

Northern Ireland Department for Communities, 'Betting, Gaming, Lotteries and Amusements', accessed 9 November 2017.

⁸ Northern Ireland Department for Communities, <u>Future Regulation of Gambling in Northern Ireland: Consultation Document</u>, February 2011, p 17.

⁹ The effect of this provision is that a remote gambling operator who does not hold the required Gambling Commission licence is not able to advertise remote gambling in Northern Ireland (*Gambling (Licensing and Advertising) Act 2014: Explanatory Notes*, 14 May 2014, p 5).

¹⁰ Northern Ireland Department for Communities, 'Betting, Gaming, Lotteries and Amusements', accessed 9 November 2017. For further information, see Northern Ireland Statistics and Research Agency, Review of the Literature on Gambling Legislation in Great Britain, Ireland (North and South) and Other National Jurisdictions, 14 April 2010.

House of Commons, 'Written Question: Internet: Betting Shops', 7 November 2017, 111074

¹² House of Commons, 'Written Question: Gambling: Internet', 31 March 2017, 68854.

¹³ Gambling Commission, 'Do I Need a Licence?', accessed 9 November 2017. Remote gambling is defined by the Gambling Act 2005 as gambling in which persons participate by the use of remote communication including: the internet, telephone, television, radio and any other kind of electronic or other technology for facilitating communication. The Gambling Commission has noted that the majority of remote gambling is engaged in via the internet.

asking payment providers to prevent payments to unlicensed website operators. ¹⁴ The Commission has a number of powers at its disposal that it can use in cases of non-compliance by licensees, including suspending or revoking a licence, imposing financial penalties, or bringing criminal proceedings against companies and individuals. ¹⁵

2.2 Remote Gambling's Position in the Gambling Industry

The most recent statistical release published by the Gambling Commission on the gambling industry as a whole in Great Britain observed the following:

- Total gross gambling yield (GGY) of the gambling industry (October 2015–September 2016): £13.8 billion.
- This represented an increase on the £12.6 billion reported for October 2014–September 2015.
- Total number of employees in the gambling industry (September 2016): 106,678.
- Total number of betting shops (March 2017): 8,788.
- This represented a slight decrease on the 8,809 reported in March 2016.
- Total number of licensed arcades (March 2017): 1,729.
- This represented a slight increase on the 1,721 reported in March 2016.
- Total number of bingo premises (March 2017): 583.
- This represented a slight decrease from the 599 reported in March 2016.
- Total number casinos (September 2016): 147.
- Total number of gaming machines (October 2015–September 2016), excluding those requiring only a local authority permit: 176,410.
- Contributions (to good causes) from the National Lottery (October 2015–September 2016): £1.7 billion.
- This was unchanged from the figure reported for October 2014– September 2015.
- Contributions (to good causes) from large society lotteries (October 2015–September 2016): £231.8 million.
- This represented an increase on the £195 million reported for October 2014–September 2015.¹⁶

¹⁴ For example, see House of Commons, 'Written Question: Gambling: Licensing',

²¹ February 2017, 63925; and House of Lords, 'Written Question: Gambling: Internet', 19 July 2016, HL1055.

¹⁵ Gambling Commission, <u>Licensing, Compliance and Enforcement Under the Gambling Act 2005:</u>
<u>Policy Statement</u>, June 2017, pp 18–29.

¹⁶ Gambling Commission, *Industry Statistics: April 2013 to March 2016—Updated to include*<u>October 2015 to September 2016</u>, May 2017, p 3; 'Industry Statistics', accessed 9 November

4

The Commission also outlined the following figures specifically relating to the remote sector, which includes online gambling:

- Total GGY for the remote sector (October 2015–September 2016): £4.5 billion (an increase on the £3.6 billion reported for October 2014–September 2015).
- Market share of the remote betting, bingo and casino sector (October 2015–September 2016): 32 percent (an increase on the 29 percent reported for October 2014–September 2015).¹⁷

The release noted that the gambling industry had demonstrated continued growth in most areas, including remote gambling, in the most recent period for which data were available. However, exceptions to this trend included bingo and the National Lottery. The Commission remarked that the 32 percent share of the gambling industry accounted for by remote gambling (most of which is engaged in via the internet) represented the largest sector in the industry as a whole. It added that of the £4.5 billion GGY generated by remote gambling between October 2015 and September 2016, casino games generated the highest turnover and £2.4 billion in GGY. This was predominantly through slots games which were responsible for generating £1.6 billion, over half of the total yield from casino games. The release further observed that the GGY for remote betting, including betting exchanges and pool betting, was £1.9 billion. The National Lottery and non-remote betting continued to represent two of the other largest sectors, with market shares of 24 percent and 25 percent respectively. The National Lottery and the narket shares of 24 percent and 25 percent respectively.

The data tables published alongside the release detail that 6,741 individuals were employed in the remote gambling sector in Great Britain in the period October 2015–September 2016, as compared with the 106,678 individuals employed in the gambling industry as a whole in September 2016.²¹

2017; and 'Gambling Statistics Paint Picture of Gambling in Great Britain', 30 June 2016. The Commission collates key statistics on the gambling industry, sourced from regulatory returns from licence holders, which it uses to publish statistical releases on the gambling industry twice a year. These releases have official statistics status (Gambling Commission, 'Latest Industry Statistics Published', 25 May 2017; and 'About the Status of Official Statistics', accessed 9 November 2017). These releases provide the latest information on each industry sector regulated by the Commission, including the online gambling sector. The next release is due on 30 November 2017. Note: Gross Gambling Yield (GGY) is defined as the amount retained by operators after the payment of winnings but before the deduction of the costs of the operation.

¹⁷ Gambling Commission, <u>Industry Statistics: April 2013 to March 2016—Updated to include October 2015 to September 2016</u>, May 2017, p 3; '<u>Industry Statistics</u>', accessed 9 November 2017; and '<u>Gambling Statistics Paint Picture of Gambling in Great Britain</u>', 30 June 2016.

¹⁸ Gambling Commission, <u>Industry Statistics: April 2013 to March 2016—Updated to include October 2015 to September 2016</u>, May 2017, p 4.

¹⁹ ibid. The release noted that remote betting was "dominated by football and horses". For a breakdown of GGY in the remote sector by activity, see House of Commons, "Written Question: Internet: Betting Shops", 7 November 2017, 111074.

²⁰ ibid.

²¹ Gambling Commission, *Industry Statistics: Table 7 (Remote Gambling)*, May 2017.

In the absence of a dedicated gambling regulator in Northern Ireland, statistics for the number of people employed in the remote gambling sector in the province are not readily available. However, according to an employment census dating from 2007 there were estimated to have been 2,389 persons employed in all gambling and betting activities in Northern Ireland in that year.²²

3. Prevalence of Gambling Behaviours

3.1 Gambling

In its <u>Gambling Participation in 2016: Behaviour, Awareness and Attitudes</u> report, published in February 2017, the Gambling Commission highlighted a number of headline findings from its estimates of gambling behaviour in Great Britain in 2016. In respect of overall gambling participation rates, these included:

- Proportion of people who participated in any form of gambling in the past four weeks: 48 percent.
- This represented an increase from 45 percent recorded a year earlier.
- Proportion of people who participated in gambling in the past four weeks, excluding those who had only played the National Lottery draw: 33 percent.
- This represented an increase from 27 percent recorded a year earlier.²³

The reported figures masked variations across gender and age profiles. Regarding gender, a larger proportion of men participated in gambling activity than women, with 53 percent of men and 44 percent of women respectively reporting participation in any form of gambling over the fourweek period. Regarding age, the report noted that those aged between 35 and 64 were more likely to have gambled than younger or older age groups, though it observed that this was predominantly driven by participation in the National Lottery. When people who had only participated in National Lottery draws were excluded, participation was noted as being highest among 16–34 year olds. The report observed large increases in gambling behaviour from people in this younger age group when compared with a year earlier, which it contended may have been due to the timing of the UEFA European Football Championship and the Rio 2016 Olympics that took place in summer 2016.²⁴

²² Northern Ireland Department for Communities, <u>Future Regulation of Gambling in Northern Ireland: Consultation Document</u>, February 2011, p 9.

²³ Gambling Commission, <u>Gambling Participation in 2016: Behaviour, Awareness and Attitudes</u> (<u>Annual Report</u>), February 2017, p 3. These estimates were based on datasets gathered via a combination of quarterly telephone (sample 2,000) and online (sample 1,000) surveys with people aged 16 and over. The surveys were conducted by Populus.

Gambling Commission, Gambling Participation in 2016: Behaviour, Awareness and Attitudes

In a report prepared for the Gambling Commission and published in August 2017, NatCen Social Research collated evidence from the Health Survey for England 2015, the Scottish Health Survey 2015 and the Wales Omnibus 2015 to present an analysis of the prevalence of gambling activity in Great Britain. This noted a higher incidence of gambling behaviour among the population at large than the Gambling Commission's earlier estimates based on telephone survey data, though it supported some of the earlier study's other findings. The report noted the following regarding overall gambling participation rates:

- 63 percent of adults (16 and over) in Great Britain had gambled in the past year [2015], with men (66 percent) being more likely than women (59 percent) to do so.
- The most popular gambling activities were the National Lottery draws (46 percent), scratchcards (23 percent) and other lotteries (15 percent).
- Excluding those who only played the National Lottery draws, just under half of adults (45 percent) participated in other types of gambling activity; 49 percent of men and 42 percent of women.
- For both men and women, overall participation was highest among the middle age groups and lowest among the youngest and oldest age groups. Excluding those who only played the National Lottery draw, gambling participation was highest among younger adults.
- Past year gambling participation rates varied across regions, from 52 percent in London to 68 percent in Scotland.²⁵

In May 2017, the Northern Ireland Department for Communities published a report on the prevalence of gambling in the province in 2016. In respect of gambling behaviour generally, the study found:

- Just over two thirds of respondents (67.2 percent) said they had gambled in the last 12 months. This is a decrease since the 2010 survey (79.8 percent).
- When compared to other regions of the United Kingdom, the level of participation in gambling in Northern Ireland is higher than the rates in England (62.0 percent) and Wales (61.3 percent), but similar to the most recent participation rate for Scotland (67.8 percent).
- Most respondents (86.1 percent) from the 2016 survey were considered to be 'non-problem gamblers' based on their Problem Gambling Severity Index (PGSI) score.²⁶

⁽Annual Report), February 2017, pp 4 and 7.

NatCen Social Research, <u>Gambling Behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales</u>, August 2017, p 1.

²⁶ Northern Ireland Department for Communities, '2016 Northern Ireland Gambling

Online Gambling

In respect of online gambling behaviours, the Gambling Commission's <u>Gambling Participation in 2016: Behaviour, Awareness and Attitudes</u> report highlighted the following estimates, including that the vast majority of online gamblers engaged in gambling activity at home:

- Proportion of people who gambled online in the past four weeks:
 17 percent (an increase from 15 percent recorded a year earlier).
- Proportion of gamblers participating in any online gambling:
 36 percent.
- Proportion of online gamblers who gambled at home:
 97 percent (no change from a year earlier).
- Proportion of online gamblers who gambled using a laptop:
 55 percent (a decrease from 61 percent recorded a year earlier).
- Proportion of online gamblers who gambled using a mobile phone or tablet: 43 percent (an increase from 33 percent recorded a year earlier).
- Average number of accounts held by online gamblers: 3 (a slight decrease from 3.5 recorded a year earlier).
- Proportion of online gamblers who bet in-play: 26 percent (a slight increase from 25 percent recorded a year earlier).²⁷

The report noted that laptops remained the most popular method of accessing online gambling overall, the majority of which took place at home, though the proportion of online gambling by mobile phone and tablet had increased from a year earlier. In addition, men were reported to be more likely to gamble using a mobile phone than women—who were in turn more likely than men to gamble using a tablet.

The report also observed that the largest increases in participation in online gambling had been seen in younger age groups, with younger online gamblers more likely than people in other age groups to gamble in locations other than at home—notably at work, whilst commuting, or in a pub or club. Rates

Prevalence Survey Published', 3 May 2017. See also Northern Ireland Department for Communities, 2016 Northern Ireland Gambling Prevalence Survey: Main Release, May 2017. The PGSI measure is based on responses to nine questions ranging from 'chasing losses' to 'gambling causing health problems' to 'feeling guilty about gambling'. Each item is assessed on a four-point scale: never, sometimes, most of the time, almost always. Responses to each item are given scores. When scores to each item are summed, a total score ranging from 0 to 27 is possible. A PGSI score of 8 or more represents a problem gambler. PGSI scores between 3 and 7 are indicative of moderate risk gambling and a score of 1 or 2 is indicative of low risk gambling (NatCen Social Research, Gambling Behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales, August 2017, p 27).

²⁷ Gambling Commission, <u>Gambling Participation in 2016: Behaviour, Awareness and Attitudes</u> (<u>Annual Report</u>), February 2017, pp 3–15; and '<u>Gambling Participation and Problem Gambling</u>', accessed 9 November 2017.

of in-play betting were also reported to be highest among 18-24 year olds.²⁸

The report further observed that 32 percent of online gamblers 'followed' a gambling company on a social media platform, though online gamblers continued to be more likely to be prompted to spend money on gambling by advertising than social media posts.²⁹

In Northern Ireland, the Department for Communities report on the prevalence of gambling in the province estimated that online gambling accounted for 15.8 percent of gambling participation in 2016.³⁰ The report also found that 20.8 percent of men and 10.7 percent of women respondents reported that they gambled online.³¹ It added that online gambling was more popular with younger age groups than older age groups, and that betting on an event or sport had the highest online engagement of the top four most popular gambling activities overall with nearly a quarter (24.0 percent) of participants betting online.³²

3.2 Problem Gambling

The Gambling Commission's <u>Gambling Participation in 2016</u>: <u>Behaviour</u>, <u>Awareness and Attitudes</u> report included information on rates of problem gambling among those who participated in gambling activity. In so doing, it noted the general definition of problem gambling used by the charity GambleAware:

Problem gambling is behaviour related to gambling which causes harm to the gambler and those around them. This may include family, friends and others who know them or care for them.³³

The report presented data on problem gambler status, as defined using the PGSI measure, collected via telephone surveys.³⁴ It noted the following regarding the prevalence of at-risk and problem gambling behaviours:

 Proportion of respondents who were identified as low or moderate risk gamblers: 5.5 percent (no statistically significant

²⁸ Gambling Commission, <u>Gambling Participation in 2016: Behaviour, Awareness and Attitudes</u> (<u>Annual Report</u>), February 2017, p 4.

²⁹ ibid.

³⁰ Northern Ireland Department for Communities, <u>2016 Northern Ireland Gambling</u> <u>Prevalence Survey: Main Release</u>, May 2017, p 37.

³¹ ibid, p 38.

³² ibid, pp 38–9.

³³ GambleAware, 'Recognise a Gambling Problem', accessed 14 November 2017.

³⁴ As detailed above, a score of I to 7 using the PGSI measure is indicative of at-risk gambling. A score of 8 or more is indicative of problem gambling (NatCen Social Research, <u>Gambling Behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales</u>, August 2017, p 40).

- change from a year earlier).
- Proportion of respondents who were identified as problem gamblers: 0.7 percent (no statistically significant change from a year earlier).³⁵

The report noted that men were more likely to be categorised as problem gamblers than women (1.2 percent compared to 0.1 percent), and that 16–24 year olds were more likely to be categorised as problem gamblers than those in older age groups.³⁶

Regarding control measures, the report observed that 6 percent of gamblers had ever self-excluded; that gamblers aged 25–34 were most likely to self-exclude; that 10 percent of online gamblers made use of financial limits to manage their gambling; and that awareness of self-exclusion had increased among those who had never excluded to 37 percent.³⁷

The NatCen Social Research report also presented estimates of the number of problem gamblers in Great Britain. In a summary of its findings in this area, the report noted:

- Problem gambling is gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits.
 Estimates of problem gambling are provided according to two different measurement instruments, the Diagnostic and Statistical Manual of Mental Disorders IV (DSM-IV) and the PGSI.
- According to the DSM-IV, problem gambling prevalence among adults living in private households was 0.7 percent. Men were more likely than women to be classified as a problem gambler according to the DSM-IV (1.3 percent and 0.2 percent respectively).
- According to the PGSI, problem gambling prevalence was 0.6 percent, with men again being more likely than women to be classified as a problem gambler (1.1 percent and 0.1 percent respectively).
- Problem gambling prevalence measured by either the DSM-IV or the PGSI was 0.8 percent, with men being more likely than women to be classified as problem gamblers (1.5 percent and 0.2 percent respectively).

³⁵ Gambling Commission, <u>Gambling Participation in 2016: Behaviour, Awareness and Attitudes</u> (<u>Annual Report</u>), February 2017, p 3. The Commission has explained that due to the small base sizes presented by the telephone survey on which the findings in this report are based, these figures should not be considered its comprehensive estimates of problem gambling rates in Great Britain (p 13). Instead, the Commission uses figures compiled from health survey data (see the NatCen Social Research report cited below for these estimates).

³⁶ ibid, p 14.

³⁷ ibid, p 4.

- The highest rates of problem gambling were among those who had participated in spread betting (20.1 percent), betting via a betting exchange (16.2 percent), playing poker in pubs or clubs (15.9 percent), betting offline on events other than sports or horse or dog racing (15.5 percent) and playing machines in bookmakers (11.5 percent).
- Problem gambling was more prevalent among people who had participated in a number of gambling activities in the past year (prevalence was 11.9 percent for those who participated in seven or more activities compared to 0.3 percent of those who had taken part in just one gambling activity in the last year).³⁸

The report explained that the 0.8 percent estimate of the incidence of problem gambling (reached using the DSM-IV or PGSI measures) meant that there were an estimated 430,000 adult problem gamblers in Great Britain in 2015. It noted that due to the confidence interval around the 430,000 figure, the number of problem gamblers could have been as low as 300,000 and as high as 560,000 adults.³⁹ The report added that a further 2 million adults in Great Britain were estimated to be 'at risk' in 2015, defined as those who showed some signs of problematic gambling but remained below the threshold for problem gambling.⁴⁰ (This figure included an estimated 1,430,000 low-risk gamblers and 555,000 moderate-risk gamblers). These figures have been cited by the Government as comprising their official estimates.⁴¹

This report further noted that the prevalence of problem gambling among men was highest in the 16–24 and 25–34 age groups.⁴² It was also highest among those adults who were economically inactive (for example, the long-term sick, carers and those looking after home or family) but not students, unemployed or retired individuals.⁴³ In addition, problem gambling was more prevalent among those who engaged in online gambling and betting activity (5.1 percent) than those who engaged in any gambling activity (1.4 percent).⁴⁴

NatCen Social Research, <u>Gambling Behaviour in Great Britain in 2015: Evidence from England</u>, <u>Scotland and Wales</u>, August 2017, pp I—2. The DSM-IV screening instrument is based on criteria from the fourth edition of the Diagnostic and Statistical Manual of the American Psychiatric Association (DSM-IV). It contains ten diagnostic criteria ranging from 'chasing losses' to 'committing a crime to fund gambling'. Each item is assessed on a four-point scale, ranging from 'never' to 'very often'. Scores are summed and problem gamblers are identified as those who meet at least three of the DSM-IV criteria (NatCen Social Research, <u>Gambling Behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales</u>, August 2017, p 36).

³⁹ ibid, p 43.

⁴⁰ ibid, p 28.

⁴¹ HC Hansard, 31 October 2017, col 712.

⁴² NatCen Social Research, <u>Gambling Behaviour in Great Britain in 2015: Evidence from England,</u>
<u>Scotland and Wales</u>, August 2017, p 41.

⁴³ NatCen Social Research, *Gambling Behaviour in Great Britain in 2015: Evidence from England*, Scotland and Wales, August 2017, p 47.

⁴⁴ ibid, p **45**.

Combined figures for the prevalence of problem gambling in Great Britain mask regional variations, with the Gambling Commission having cited the following estimates for England, Scotland and Wales respectively:

- 0.5 percent of people aged 16+ in England identify as problem gamblers (2012).
- 0.7 percent of people aged 16+ in Scotland identify as problem gamblers (2015).
- 1.1 percent of people aged 16+ in Wales identify as problem gamblers (2015).⁴⁵

In Northern Ireland, the latest official report on the prevalence of gambling behaviour estimated the prevalence of problem gambling in the province to be much higher than in other areas of the United Kingdom. The report estimated that 2.3 percent of respondents to a survey of 1,004 adults resident in the province were problem gamblers and 4.9 percent were moderate risk gamblers. In addition, problem gamblers were more likely to be male than female, and to belong to a younger than an older age group. Moderate risk and problem gamblers were also more likely to belong to the 'semi-skilled workers/state pensioners' group (11.3 percent), than the 'lower middle class' (2.8 percent).

Regarding control measures, according to the Gambling Commission there were 812,657 applications made for self-exclusion and 58,375 known breaches of self-exclusions in Great Britain between October 2015 and September 2016.⁴⁹ In addition, 46,222 individuals cancelled their self-exclusion after the minimum period (currently six months).⁵⁰ In the absence of a dedicated gambling regulator in Northern Ireland, equivalent figures do not appear to be readily available for the province.

4. Challenges Facing Problem Gamblers

As noted above, problem gambling is widely understood to be behaviour related to gambling which causes harm to the gambler and those around them. This may include family, friends and others who know them or care for them, including work colleagues.⁵¹

⁴⁹ Gambling Commission, <u>Industry Statistics: Table 7 (Remote Gambling)</u>, May 2017. Note that remote gambling customers may have accounts with more than one operator and therefore these figures relate to accounts rather than individuals.

⁴⁵ Gambling Commission, '<u>Gambling Participation and Problem Gambling</u>', accessed 14 November 2017.

⁴⁶ Northern Ireland Department for Communities, <u>2016 Northern Ireland Gambling Prevalence Survey: Main Release</u>, May 2017, p 23. The survey used the PGSI measure. ⁴⁷ ibid, p 25.

⁴⁸ ibid, p 31.

⁵⁰ ibid; and Gambling Commission, 'Self-exclusion', accessed 9 November 2017.

⁵¹ GambleAware, 'Recognise a Gambling Problem', accessed 14 November 2017.

The challenges facing problem gamblers can be multifaceted and complex, and differ in severity depending on an individual's personal circumstances. As the charity GambleAware has explained, problem gambling can affect an individual's mental health by causing stress, depression or anxiety. It can also cause financial difficulties by leading an individual to fall behind at work and struggle to maintain their employment, or lead to a build-up of unmanageable debt. It can also lead to the breakdown of relationships, including those in a family unit. In addition, the NHS has observed that problem gamblers are more likely to suffer from low self-esteem, stress, anxiety and depression, and that gambling addicts are more likely to go to prison as a result of criminal activity—almost always theft and fraud. Sa

Professor Mark Griffiths, Director of the International Gaming Research Unit at Nottingham Trent University, has elaborated on this theme. He has argued that 'problem gambling' should be thought of as a term which lies on a continuum—at the other end of which lays 'gambling addiction'. Problem gambling, he contends, while still a major concern, may not lead to problems in every area of a person's life. Gambling addiction, on the other hand, may lead to a host of negative consequences, including:

[...] interference with performance of life roles (eg job, social activities, or hobbies), impairment of social relationships, criminal activity, legal problems, involvement in dangerous situations, physical injury and impairment, financial loss, or emotional trauma.⁵⁴

In addition, Professor Griffiths has argued that problem gambling does not often occur in a vacuum and is often co-morbid with other behavioural and psychological disorders, "which can exacerbate, or be exacerbated by, problem gambling". 55 He has outlined the challenges which may therefore affect problem gamblers as follows:

Some of the psychological difficulties a problem gambler may experience include anxiety, depression, guilt, suicidal ideation and actual suicide attempts. Problem gamblers may also suffer irrational distortions in their thinking (eg, denial, superstitions, overconfidence, or a sense of power or control). Increased rates of attention-deficit hyperactivity disorder (ADHD), substance abuse or dependence, antisocial, narcissistic, and borderline personality disorders have also been reported in pathological gamblers. There is frequently a link with

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⁵² GambleAware, 'Recognise a Gambling Problem', accessed 14 November 2017. See also Centre for Social Justice, 'Special Report: Gambling Addiction in the UK', 10 July 2007.

⁵³ NHS Choices, 'Gambling Addiction', 23 April 2015. The NHS runs a specialist treatment centre, the National Problem Gambling Clinic, based in London (National Problem Gambling Clinic, 'About Us', accessed 14 November 2017).

⁵⁴ Mark Griffiths, <u>Problem Gambling in Great Britain: A Brief Review</u>, Nottingham Trent University, July 2014, p 3.

⁵⁵ ibid, p 7.

alcohol or drugs as a way of coping with anxiety or depression caused by gambling problems, and, conversely, alcohol may trigger the desire to gamble. There is also some evidence that co-morbidities may differ among demographic subgroups and gambling types.⁵⁶

Professor Griffiths added that research on gambling behaviours has suggested that it is mutable and therefore subject to change over time.⁵⁷ The challenges facing problem gamblers are, as a consequence, likely to depend on the individual circumstances of the individual concerned at any point in time.

More broadly, problem gambling has been identified as an issue which not only affects individuals, but society as a whole through its costs in damaged relationships and the health and financial situation of those affected, though it has been contended that the totality of these effects is not yet fully known. For example, the chair of the Gambling Commission, William Moyes, has stated that "problem gambling has a real cost to the economy and to the individuals and families affected by it, although the scale of the adverse impact is currently poorly understood". For Professor Griffiths has also commented on this issue, stating that "at a societal level, the economic and social impacts of gambling, its role in public policy and its public health implications are under-researched". Mr Moyes followed up his view that further research is required in the area of online gambling by setting out the Gambling Commission's ambitions to understand the risks posed by the projected increase in online gambling activity:

We, and policy-makers, need to understand better the risks posed by online gambling and what might be the most effective methods of regulating this industry to keep up-to-date with the constant evolution that online gambling offers. We are carrying out a considerable amount of work to better understand and address the risks posed by this market. In focusing on online gambling, we are working closely with the Advertising Standards Authority, the Competition and Markets Authority and other agencies. We hope to publish our thinking early in 2018.⁶⁰

Specifically in relation to online gambling, concerns have been raised about how this mode of access to gambling activity could contribute to excessive gambling and the related potential for harm which may arise from such behaviour. For example, Dr Sally Gainsbury, Deputy Director of the

58 Gambling Commission, Annual Report and Accounts 2016/17, 4 July 2017, p 9.

⁵⁶ Mark Griffiths, <u>Problem Gambling in Great Britain: A Brief Review</u>, Nottingham Trent University, July 2014, p 7.

⁵⁷ ibid, p 6.

⁵⁹ Mark Griffiths, <u>Problem Gambling in Great Britain: A Brief Review</u>, Nottingham Trent University, July 2014, p 33.

⁶⁰ Gambling Commission, Annual Report and Accounts 2016/17, 4 July 2017, p. 11.

Gambling Treatment and Research Clinic at the University of Sydney, has summarised these concerns as follows:

[Online gambling] is a largely automated activity that could be conducted in private, at any time and location, using highspeed internet connections enabling rapid placement of bets and notification of outcomes. The ability for large wagers, continuous gambling, rapid feedback and instant, easy access to a vast number of betting options has resulted in concerns that internet gambling could contribute to excessive gambling.61

However, following a literature review, Dr Gainsbury concluded that online gambling itself was not a cause of problems, but rather a potential catalyst:

Taken together, the evidence reviewed here suggests that internet gambling does not cause gambling problems in, and of, itself. However, use of internet gambling is more common among highly involved gamblers, and for some internet gamblers, this medium appears to significantly contribute to gambling problems. Internet gamblers are a heterogeneous group, and the impact of this mode of access on gambling problems is moderated by a range of individual, social and environmental variables. As internet gambling continues to evolve and participation increases, particularly among young people who are highly familiar with internet technology and online commerce, it is likely that related problems will emerge. Research and regulation will have to evolve to further the understanding of the impact of this mode of access on the experience and incidence of gambling disorders.62

Dr Gainsbury followed this conclusion by highlighting the potential for online gambling providers to improve the detection of problematic behaviours among online gamblers:

The internet offers a potentially strong environment for the provision of responsible gambling, including player-focused tools and resources for moderating play such as expenditure tracking, self-set spend limits, time outs and information. Furthermore, operators can enact strategies to assist customers including targeted notifications (eg, popup messages) based on patterns of play and other tailored contacts derived from analysis of player accounts to identify risky behaviour.⁶³

⁶¹ Sally Gainsbury, 'Online Gambling Addiction: The Relationship Between Internet Gambling and Disordered Gambling', Current Addiction Reports, 2015, vol 2 no 2, p 185.

⁶² ibid, p 190. 63 ibid.

She added that "online self-exclusion programmes should be developed that would allow individuals to exclude themselves from multiple gambling sites simultaneously".⁶⁴

These conclusions have been echoed in recent research by Professor Griffiths. In a journal article on the subject of consumer protections in place for online gamblers, he stated:

Online gambling can be riskier for problem gamblers because online gambling offers a function for mood-modifying experiences, including escapism, immersion, and dissociation, which may be more prominent in the online gambling world. This excessive involvement can—in some cases—lead to more problematic gambling behaviour. However, because of the way that online companies can collect behavioural tracking data on their clientele, internet gambling may in turn offer possibilities for utilising responsible gambling tools (eg, temporary self-exclusions, personalised behavioural feedback, limit setting tools, popup reminders, etc) that might be difficult in a land-based setting unless player cards are used to track the totality of a gambler's behaviour.⁶⁵

The authors of the article made a number of recommendations relating to consumer protection by providers of online gambling services, including that operators should provide "signposting towards a referral service to help those who think they may have a gambling problem"; "blocking software for those gamblers who request it"; and "an easy to use voluntary self-exclusion system that does not involve contacting customer service or filling out a long form". 66

5. Multi-Operator Self Exclusion Scheme

The Gambling Commission has stated that self-exclusion is "widely accepted as an important harm minimisation tool for some people who have recognised that they have a problem with their gambling and have made a commitment to dealing with it and for others who wish to use measures such as this to better manage their gambling activities".⁶⁷ The Commission added that "one of the principal benefits of self-exclusion is the formal acknowledgement by the individual that they are experiencing problems with their gambling and wish to take steps to address these problems".

⁶⁴ Sally Gainsbury, 'Online Gambling Addiction: The Relationship Between Internet Gambling and Disordered Gambling', Current Addiction Reports, 2015, vol 2 no 2, p 190.

⁶⁵ Maris Bonello and Mark Griffiths, '<u>Analysing Consumer Protection for Gamblers Across Different Online Gambling Operators: A Descriptive Study</u>', *Gaming Law Review and Economics*, April 2017, vol 23 no 3, pp 278–9.

^{აა} ibid, p 284

⁶⁷ Gambling Commission, <u>Briefing Note on the National Online Self-exclusion Scheme</u>, May 2015, p 2.

Multi-operator self-exclusion schemes currently run across the industry for betting shops, casinos and bingo venues in the UK.⁶⁸ However, no such scheme currently operates across online operators providing gambling services to consumers in the UK. This means that an individual wishing to self-exclude entirely from online gambling would need to contact and self-exclude separately with each operator.

In 2014, the Gambling Commission conducted a consultation about proposed amendments to the social responsibility provisions in its licence conditions, which included a proposal to introduce a new social responsibility code that would require the majority of online gambling operators to participate in a national online self-exclusion scheme.⁶⁹ It stated that the Gambling (Advertising and Licensing) Act 2014 had provided a framework for a multi-operator self-exclusion scheme be established across online operators for the first time. In 2015, the Commission published a briefing note on the proposed online self-exclusion scheme which provided background information on the initiative.⁷⁰ More recently, the Commission stated that the gambling industry aims to have an online multi-operator self-exclusion scheme in place by 2018.⁷¹ The scheme will be known as GAMSTOP and will be operated by the Remote Gambling Association (RGA), a trade association for online operators.

The Gambling Commission has stated that it supports an industry-led and managed scheme:

An industry-led and managed solution is best placed to deliver an effective and efficient scheme by building, in particular, on the core experience and expertise in the industry of developing and overseeing large IT solutions, as well as administering current [non-online] self-exclusion schemes.⁷²

The RGA has remarked that the scheme will "enable UK consumers to exclude themselves via a single website process from all online gambling operators that are licensed by the Gambling Commission". The added that the "website will also set out other measures that are available to help people manage their gambling and will signpost specialist advice and support

⁶⁸ GamCare, 'Self-exclusion', accessed 14 November 2017.

⁶⁹ Gambling Commission, <u>Proposed Amendments to the Social Responsibility Provisions in the Licence Conditions and Codes of Practice for All Operators (the LCCP)</u>, August 2014, p 48.

⁷⁰ Gambling Commission, <u>Briefing Note on the National Online Self-exclusion Scheme</u>, May 2015.

⁷¹ Gambling Commission, 'Online Multi-operator Self-exclusion Scheme', accessed 14 November 2017.

⁷² ibid.

⁷³ Remote Gambling Association, 'GAMSTOP Announced as the Brand Name for UK National Online Self-exclusion Scheme', I June 2017. The scheme will extend to Northern Ireland by virtue of the Gambling (Licensing and Advertising) Act 2014 prohibiting the provision of unlicensed remote gambling in Northern Ireland (Gambling (Licensing and Advertising) Act 2014: Explanatory Notes, 14 May 2014, p. 5).

services for those who might benefit from it". The RGA has stated that its aim is to have GAMSTOP fully implemented before the end of December 2017. The GAMSTOP website currently states that the scheme is planned to launch in spring 2018.

Criticism of self-exclusion schemes include that the existing and forthcoming schemes are not linked. For example, an individual who has self-excluded from betting shops can gamble in other forms, such as online. In 2012, the House of Commons Culture, Media and Sport Committee recommended that the Government "should support the development of a system which would allow a customer to self-exclude from all forms of gambling regulated by the Gambling Commission".⁷⁷ This is also an issue that has been raised in academic literature reviews on self-exclusion programmes.⁷⁸

The forthcoming scheme has received criticism from other quarters. For example, Adam Bradford, the son of a gambling addict who was imprisoned for fraud offences, has been quoted as saying that the proposal for the RGA to run the scheme was "like asking a policeman to arrest himself for a crime".⁷⁹

Sarah Harrison, Chief Executive of the Gambling Commission, has stated that "operators remain on track to implement the scheme for the online sector in the coming year". 80

6. Recent Developments

6.1 Government Policy

In October 2016, the Department for Digital, Culture, Media and Sport launched a review of gaming machines and social responsibility measures which began with a call for evidence.⁸¹ In this call for evidence, the Government acknowledged the increasing market share of online gambling.⁸² In October 2017, the Department published the responses and launched a

⁷⁴ Remote Gambling Association, 'GAMSTOP Announced as the Brand Name for UK National Online Self-exclusion Scheme', I June 2017.

⁷⁵ ibid.

⁷⁶ National Online Self Exclusion Scheme, '<u>Self-exclusion from Gambling</u>', accessed 14 November 2017.

⁷⁷ House of Commons Culture, Media and Sport Committee, <u>The Gambling Act 2005: A Bet Worth Taking?</u>, 24 July 2012, HC 421 of session 2010–12, p 27.

⁷⁸ See, for example, Sally Gainsbury, 'Review of Self-exclusion from Gambling Venues as an Intervention for Problem Gambling', Journal of Gambling Studies, 2014, vol 30 no 2.

⁷⁹ BBC News, '<u>The Tricky Issue of Problem Gambling</u>', 31 August 2017.

⁸⁰ Gambling Commission, Annual Report and Accounts 2016/17, 4 July 2017, p. 13.

⁸¹ Department for Digital, Culture, Media and Sport, <u>Review of Gaming Machines and Social Responsibility Measures: Call for Evidence</u>, 24 October 2016.

⁸² ibid, p 3.

consultation on proposals for changes to gaming machines and social responsibility measures.⁸³ The Government's proposals in relation to social responsibility measures included a number relating specifically to online gambling.⁸⁴

In its consultation document, the Government stated that it welcomed the new multi-operator self-exclusion scheme for online gambling, adding that it wanted to see the industry "promote awareness of the scheme and do more to increase the take up of this, and other responsible gambling tools that are available". It added that it had noted concerns expressed by the Gambling Commission that the pace of change by the industry in respect of consumer protection measures had "not been fast enough", and outlined its expectations for the industry. These expectations included that the industry ensure that "implementation of the new multi-operator online self-exclusion scheme is completed at the earliest opportunity". Se

The Government further stated that it was concerned about the prevalence of free bet offers on online gambling websites and apps, and the absence of limits on stakes and prizes in virtual games offered by online operators. It added that it supported the Gambling Commission's review of the online sector, which would "inform any future action in relation to online gambling". The consultation will close on 23 January 2018.

Tom Watson, Shadow Secretary of State for Digital, Culture, Media and Sport, criticised the Government following the publication of its consultation:

We have consistently said to the Government that our gambling laws are no longer fit for purpose. There has been an explosion of online and digital-platform gambling that the Gambling Act 2005 could not have anticipated. We have offered to work with the Government on a cross-party basis to make our laws fit for the digital age. The report published today could have been a significant starting point for the process, because even by the most conservative estimates, the associated harms and costs of gambling addiction are believed to total more than £1 billion a year—and I bet the true figure is far higher. The impact is felt not only through the losses that gamblers accrue but through NHS and treatment costs, in our communities as families

⁸³ Department for Digital, Culture, Media and Sport, '<u>Call for Evidence: Review of Gaming Machines and Social Responsibility Measures</u>', 31 October 2017; and '<u>Consultation on Proposals for Changes to Gaming Machines and Social Responsibility Measures</u>', 31 October 2017

⁸⁴ Department for Digital, Culture, Media and Sport, <u>Consultation on Proposals for Changes to Gaming Machines and Social Responsibility Measures</u>, October 2017, pp 33–9.

⁸⁵ ibid, p 37.

⁸⁶ ibid, p 38.

⁸⁷ ibid, p 39.

struggle and break down, and in our police forces, which deal with the resultant crime.⁸⁸

The Labour Party had earlier called for a levy on the gambling industry to fund addiction treatment.⁸⁹

Speaking for the Liberal Democrats following a statement on the Government's plans in the House of Lords, Lord Clement-Jones asked whether stakes in online games would be considered during the consultation process. Lord Ashton of Hyde, speaking on behalf of the Government, indicated that the issue of stakes was addressed in the consultation document. In the consultation document.

6.2 Gambling Commission

In July 2017, the Gambling Commission published a new enforcement strategy, which included changes to its statement on financial penalties that would allow the introduction of higher penalties for breaches of licencing terms by gambling operators. Since July, the Commission has imposed a number of fines on remote gambling operators for breaches of their licencing conditions, including in relation to their treatment of vulnerable customers.

The Commission welcomed the publication of the Government's consultation on proposals for changes to gaming machines and social responsibility measures. It commented that the document highlighted the "work we are doing separately to examine the online sector. In particular, we are looking at data, market trends (both current and future), consumer participation and action by operators on social responsibility and crime in the online market". The Commission stated that recommendations for action would be published once this work was complete. 94

⁹¹ See in particular, Department for Digital, Culture, Media and Sport, <u>Consultation on Proposals for Changes to Gaming Machines and Social Responsibility Measures</u>, October 2017, p 39.

⁸⁸ HC Hansard, 31 October 2017, col 704.

⁸⁹ BBC News, '<u>Labour Plan Gambling Levy to Fund Addiction Treatment</u>', 26 September 2017.

⁹⁰ HL Hansard, 31 October 2017, col 1282.

⁹² Gambling Commission, 'Gambling Commission Unveils New Enforcement Strategy', 5 July 2017. See also Philip Evans and Tom Orpin-Massey, 'All Change for Commercial Gambling?', New Law Journal, 15 September 2017.

⁹³ See, for example, Gambling Commission, 'Gambling Firm 888 to Pay Over £7.8 Million for Failing Vulnerable Customers', 31 August 2017.

⁹⁴ Gambling Commission, 'Government's Consultation on Proposals for Changes to Gaming Machines and Social Responsibility Measures', 31 October 2017. The Commission also published advice it had received on the review from the Responsible Gambling Strategy Board (Responsible Gambling Strategy Board, Advice in Relation to the DCMS Review of Gaming Machines and Social Responsibility Measures, 31 January 2017).

On 14 November 2017, the Commission published a new strategy for the period 2018–2021. In respect of online gambling, the strategy set out how the Commission wanted operators to utilise technological changes to improve consumer protections:

Online gambling has grown at a rapid rate, now representing around a third of gambling spend. Our current work and government interest is focused on the issues this raises for consumers and regulation. We need to be prepared for the consumer risks and regulatory challenges that further market and technology changes bring, whilst also being ready to seize the opportunities. We want licensees to be just as focused on how they can exploit new technologies to manage risks and protect consumers, as they are on how to use them to achieve their commercial ambitions.⁹⁵

In respect of Northern Ireland, the Department for Communities has stated that a strategic review of gambling policy, practice and law is underway. Proposals for change were outlined to the Northern Ireland Assembly Committee for Social Development in 2013.⁹⁶

Responsible Gambling Strategy Board

The Gambling Commission supports the Responsible Gambling Strategy Board, a group of expert advisors which:

- Advises the Gambling Commission (and through them, the Government) on the research, education and treatment elements in a national responsible gambling strategy.
- Determines and recommends to GambleAware (after consultation with stakeholders and experts) what research, education and treatment is required to reduce harm from problem gambling as part of an overall national responsible gambling strategy, and the levels of funding necessary to deliver the recommended priorities.⁹⁷

The current National Responsible Gambling Strategy, for the period 2016–17 to 2018–19, made a number of observations in respect of remote gambling. The strategy noted that the Gambling Commission "may need to explore the desirability, practicality and cost-effectiveness of linking [self-exclusion] schemes across different parts of the industry", including the

⁹⁵ Gambling Commission, <u>Strategy 2018–2021</u>, 14 November 2017, p 7. See also Gambling Commission, '<u>Commission Lays Out Roadmap for Fairer and Safer Gambling</u>', 14 November 2017.

⁹⁶ Northern Ireland Assembly, 'Committee for Social Development: Betting, Gaming, Lotteries and Amusements Bill—Department for Social Development Briefing', 7 February 2013.

⁹⁷ Responsible Gambling Strategy Board, 'About Us', accessed 14 November 2017.

land-based and remote sectors. ⁹⁸ It also called for a mechanism that could be used by the Commission to keep abreast of technological change and innovation to help identify potential issues which may create an increased risk of harm. It added that such a mechanism "should include the capacity to monitor developments in other jurisdictions and in social trends that might become relevant to the gambling sector (such as social gaming and its relevance to the encouragement or normalisation of gambling by children and young persons)". ⁹⁹

In an update on this strategy published in June 2017, the Board gave a 'green/amber' progress marker for self-exclusion. In respect of next steps, it stated:

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

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

Efforts should continue to promote awareness of self-exclusion schemes and take-up of other responsible gambling tools. 100

⁹⁸ Responsible Gambling Strategy Board, <u>National Responsible Gambling Strategy 2016–17 to 2018–19</u>, 11 April 2016, p 25.

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Responsible Gambling Strategy Board, One Year On: Progress Delivering the National Responsible Gambling Strategy, June 2017, p. 16.

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