

Call for Evidence on Gaming Machines and Social Responsibility Measures
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The Industry Group for Responsible Gambling (IGRG) is designed to develop and implement responsible gambling initiatives which truly make for improvement throughout the whole industry. It was formed in 2014 and incorporated in November 2015. IGRG comprises of five trade associations which represent operators in all sectors of the gambling industry:

- Association of British Bookmakers (ABB)
- Bacta
- The Bingo Association (BA)
- National Casino Forum (NCF)
- Remote Gambling Association (RGA)

IGRG represents some 640 operators and 8,500 licensed premises across the gambling industry. It is the first time that such an organisation, representing the whole industry, has come together in this way. Member trade associations are all working hard together to find areas of mutual interest, reflecting a strong and genuine commitment on the part of the whole industry to social responsibility, which is now gathering considerable momentum.

IGRG's mission is to provide a structure better to promote socially responsible gambling in all gambling sectors in the UK. Individual operators and their trade associations are already very active in this area and will continue to be so. The purpose of IGRG is not to replicate these activities, but to identify and undertake pan-industry initiatives that will complement these activities.

Both the Gambling Commission and the Responsible Gambling Strategy Board have high expectations of IGRG and we will endeavour to meet those expectations but, first and foremost, IGRG was formed on the initiative of industry operators in recognition of their desire to make a demonstrable improvement to social responsibility in the gambling industry. We strive to ensure that these initiatives go beyond the lowest common denominator amongst IGRG members and raise standards across all sectors.

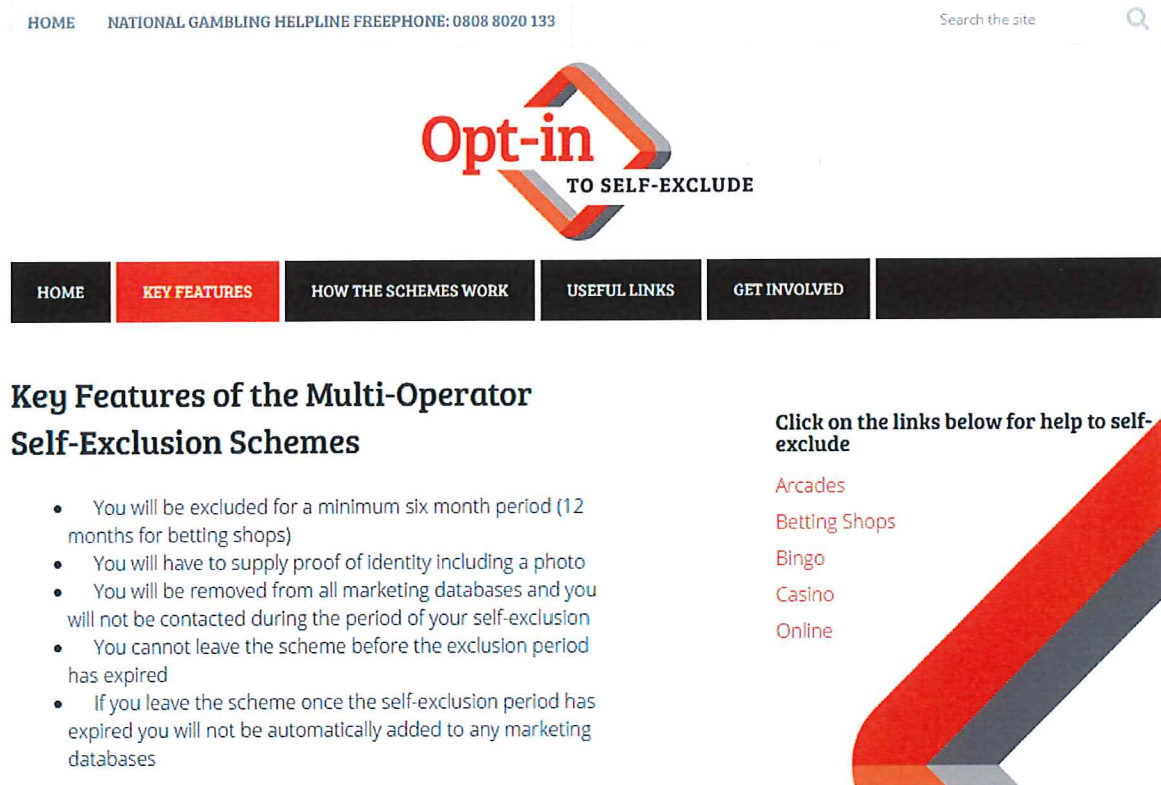
IGRG provides a great forum for industry to work together and provides solid foundations for important responsible gambling initiatives, so our work is directly relevant to a number of questions in this call for evidence.

Q5. What has been the impact of social responsibility measures since 2013, especially on vulnerable consumers and communities with high levels of deprivation? Please provide evidence to support this position.

Deployed

The casino sector launched a national multi-operator voluntary self-exclusion scheme in August 2015. The Arcade, Betting and Bingo sectors implemented sector-wide self-exclusion schemes in April 2016 (with the remote sector due to do so in 2017).

IGRG developed a signpost system to direct people to information about self-exclusion and how to access self-exclusion from the various types of retail and non-retail gambling activities. The signpost website - 'Opt-in to Self-Exclude' - has links to each sector's multi-operator self-exclusion scheme and includes additional helpful information for consumers.



IGRG has been promoting this site with treatment providers, outreach agencies and local authorities.

Ongoing

On its inception, IGRG commissioned a stocktake of the existing social responsibility activities in each sector to understand what was currently happening and to identify potential areas to which the whole industry (land-based and remote) could contribute. As a result of this work, IGRG identified several key areas in which a pan-industry approach could deliver results.

These evolved into four projects designed to complement each other and deliver co-ordinated results. IGRG undertook substantial preparatory work in these areas and successfully bid for funds from GambleAware. Progress with these projects is reported to the Responsible Gambling Strategy Board (RGSB) which monitors industry actions which are delivering the National Responsible Gambling Strategy. IGRG also facilitates participation by its member associations in that monitoring process.

Messaging

Social Responsibility messaging was identified as a key area in which work was needed to improve the industry's activities, and three of the four projects relate to messaging.

General Messaging: To generate, trial and evaluate the effectiveness of ideas for social responsibility messaging that aim to have a positive impact on gamblers' behaviour. The "When The Fun Stops, Stop" campaign is an example of general messaging. This project is tasked to come up with messaging ideas which can be used effectively across sectors and across demographics.

Play Messaging: To assess and make recommendations on ways to develop and improve the effectiveness of play information to all consumers, which is bespoke to an individual's own gambling behaviour. One of the required outcomes is that upon implementation by the industry, players should be able to get targeted personal information about their play, which will inform, empower and enable them to better manage their gambling and reduce their risk of being harmed, by becoming more self-aware.

Product Messaging: To assess and make recommendations on ways to develop and improve the effectiveness of product information to all consumers. One required outcome being that players are able to get access to clear, accurate and easy to understand information about the products they use, including how the product works and the chance of winning. Again, this will inform, empower, and enable them to better manage their gambling and reduce their risk of being harmed, by becoming more self-aware.

Training Strategy

The fourth project is intended to produce standard industry training in Social Responsibility and to then build tools to allow for effective evaluation of the success of the training, not just in terms of staff understanding and deployment, but also in outcomes for those customers that have developed gambling related problems or those who are at risk of doing so.

It is well trained staff in call centres, betting shops, arcades, casinos and bingo clubs who are best placed to identify and interact with problem and at risk gamblers and we believe that this project can really make a difference.

Process

In practical terms, each project is following broadly the same process:

- Phase 1 - Define strawman outline (what would best practice look like), source existing good practice, generate additional practice (if existing good practice is unlikely fully to achieve the vision), small scale trials
- Phase 2 - Pilot best practice; and
- Phase 3 – Implementation

Social messaging project is slightly different in that consumer research is being used to develop the vision for best practice.

The engagement of, and participation with, industry is critical to all four projects. Industry participation is vital to obtaining information on current activities, establishing a vision for the future, testing messaging options, developing outcomes that are practical and workable and implementing them.

Successful industry participation is vital to ensure that the operators have “bought into” the implementation of the outcomes. IGRG will be co-ordinating and leading industry input throughout the process. We have created industry working groups regularly throughout the course of the projects.

All four projects are now off the ground and progressing well. Successful research and creative agencies have been appointed – “Future Thinking” and “18 Feet and Rising” for social messaging and “Revealing Reality” are involved in all four. Operator working groups have been meeting with these agencies, best practice for player and product messaging has been collated and the more interesting research and innovation phase is under way. Literature reviews and interviews with experts in relation to training will be completed this year. The overall goal is that we are ready to start industry-wide implementation of outcomes from August 2017.

Q6. Is there anything further that should be considered to improve social responsibility measures across the industry? Please provide evidence to support this position.

In terms of future projects, a cross sector GambleAware promotion is under active consideration for 2017. This will be an opportunity for each sector to raise responsible gambling awareness under the overarching IGRG umbrella. This will serve as a pilot for what can be achieved by the industry acting together to achieve an economy of scale through coordinated effort.

GambleAware has commissioned the four current projects in partnership with IGRG, providing a model for future industry-wide social responsibility actions, provided of course that its trustees are satisfied they fall within its charitable goals. Clearly implementation will be a matter for the industry itself.

Q7. Is there any evidence on whether existing rules on gambling advertising are appropriate to protect children and vulnerable people from the possible harmful impact of gambling advertising?

Following the announcement by DCMS in 2014 of a review into all aspects of the regulation of gambling advertising, a decision was taken within the industry that IGRG would assume ownership of the Industry Code for Socially Responsible Advertising.

After extensive discussions with the constituent parts of the gambling industry and with other stakeholders such as the Advertising Standards Authority, a range of additions and enhancements were made to the Code. The revised Code was then published under the IGRG banner in August 2015 and it came fully into effect in February of this year. The IGRG Code was early evidence of the kind of benefits that can be delivered when the industry works together constructively.

Compliance with the Industry Code for Socially Responsible Advertising is an ordinary code provision of the licence conditions and codes of practice. While these do not have the status of licence conditions, failure to take account of them can be used as evidence in criminal or civil proceedings, so it is in effect a regulatory requirement.

As we made clear at the time, the Code will be reviewed on an annual basis and provision is included in our work programme for the first of those reviews to take place in early 2017. As part of that

process, we would of course be willing to take into consideration any issues that arise from the DCMS call for evidence.

Conclusion

We are working to achieve a lot more cooperation both within and across sectors. There is a commonality of language of senior executives from all sectors when it comes to responsible gambling and the sincere desire to do better. We are in a very different place to where we were even a year or two ago. The issues have moved from the compliance and regulatory affairs departments to the boardrooms of the biggest gambling operators in all sectors and that is where the leadership is going to come from to shape the future of the industry: Leadership which will be deserving of support and recognition from government. Responsible gambling is a complex and challenging issue, but so are lots of aspects of this business and we are determined to find solutions.

IGRG's members would encourage the Government to make proportionate decisions led by the empirical evidence presented during this consultation process, and not to be swayed by sentiment and anti-industry rhetoric, not least in the media. The sectors and members that we represent have made significant strides in relation to protection of the vulnerable and these initiatives, which continue to be developed, are deserving of recognition and support.

IGRG has a role to play, providing the opportunity through industry cooperation to promote responsible gambling and to back up those words with practical, workable responsible gambling initiatives for the benefit of all consumers, industry stakeholders and society as a whole.

Yours faithfully

