



Gambling Commission – consultation on proposed changes to Licence Conditions and Codes of Practice (LCCP) and Remote Gambling and Software Technical Standards (RTS)

Socially responsible incentives

We want to ensure that incentives such as free bets and bonuses are constructed in a socially responsible manner and do not encourage excessive or harmful gambling. As a result, we are consulting on proposals to ban or limit on the use of wagering requirements in promotional offers and a proposal to ban on the mixing of product types (e.g. betting, bingo, casino, and lotteries) within incentives. We are also consulting on changes to the section of our LCCP that covers rewards and bonuses to make it explicit that incentives should be constructed in a manner that does not lead to excessive or harmful gambling.

11. If one of these proposals were to be adopted, which do you prefer?

Option A – ban wagering requirements

Option B – cap wagering requirements

12. To what extent do you agree with the proposed option A to ban wagering requirements?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give reasons, including any evidence, for your answer

Gambling with Lives (GWL) is a charity that was founded in 2018 by Liz and Charles Ritchie MBEs. In 2017 Liz and Charles lost their son Jack to gambling-related suicide, which led them to find and meet other families bereaved by gambling-related suicide.

As a charity we now support many families bereaved by gambling-related suicide from all over the UK, campaign for legislative change, and raise awareness of the devastating effects of gambling disorder.



As part of the support we provide to bereaved families, we discuss and explore the circumstances leading to the deaths of their loved ones. This can include analysis of their loved one's detailed gambling (provided through Subject Access Requests from gambling operators) and banking records.

Our answers to this consultation are based on the overall lessons learned from these investigations and informed by academic research and data. We have also consulted with people in recovery from gambling disorder and included their experiences with wagering requirements. We have provided some detail from examples of the experiences of individuals and families to illustrate key recommendations.

We believe that all forms of inducements to gamble should be banned, including wagering requirements, which are misleading and encourage people to use highly addictive gambling products for extended periods of time, spend more money that they would have wished or can afford, often for the first time as part of a sign up "bonus".

In 2023, a class-action lawsuit was brought against US sports betting operator DraftKings for "unfair and deceptive promotional offers", specifically relating to wagering requirements attached to a £1,000 "sign-up bonus". The case is being funded by the Public Health Advocacy Institute and has been backed by Professor Richard Daynard, a US law professor that was heavily involved in the litigation strategy against Big Tobacco.

Academic research into the specific effects and impacts of wagering requirements is limited, however research has clearly linked the incentives themselves ("free bets") to harm, including (1, 2):

- gambling for the first time
- being drawn back into gambling after stopping
- gambling with a new company
- gambling on a new product
- placing riskier bets
- gambling in a way outside their usual pattern
- gambling longer than they want

The Commission's own research (3) shows that these offers are targeted at people classified as suffering from problem gambling, with 35% receiving daily offers compared to just 4% of people classified as non-problem gambler. All of this research also confirms that the negative impact is greatest on people already being harmed.

Lived experience testimony confirms this, with one respondent gambling for "days and weeks" to try and meet wagering requirements, as does the Gambling Commission's own consumer research (4):

"... a number of behaviours associated with using promotional offers that may demonstrate risk of harm, including:

- the urgency to meet wagering requirements within an allotted time leading to longer gambling sessions"

Wagering requirements normalise excessive time spent gambling on addictive products – it is both dangerous and unique that this happens in gambling. It would be unfathomable to imagine such promotions with other legal, addictive, health-harming products, such as alcohol or tobacco. For



example, a £10 “free bet” with a wagering requirement of 10x would require someone to gamble £100 before being able to withdraw their £10 bonus. The longer someone gambles, the more likely it is they will suffer harm. Clearly wagering requirements are designed to encourage the customer to gamble for as long as possible, which is stated in the consultation document:

“Gambling licensees often use wagering requirements to allow customers to gamble longer on a product and to enable them to promote higher value, and therefore, more attractive incentives.”

Certain “free bet” offers – such as this one by Monster Casino (5), a brand belonging to UK-licensed ProgressPlay – have absurd wagering requirements of 50x with a “free bonus” of up to £1,000 available. To withdraw the maximum “bonus” included in this offer, you would have to stake £50,000 – more than the UK average salary.

We spoke to people in recovery from gambling disorder who described their experiences with wagering requirements:

“Wagering requirements often felt like a maze with no exit. Initially, they promise a quick win, but the reality is they start a cycle of betting that pulls you deeper into gambling. Each bet took my money but also my time and peace of mind, growing my addiction under false pretences.

“Wagering requirements are a deceptive practice that can turn what starts as a pastime into a devastating trap you can’t escape from. They should be banned”.

Anonymous, Manchester

“The so-called “FREE BETS” was simply to get huge numbers addicted within their platform and to keep myself gambling more and more. Bet365 for many years had a £200 opening offer and the terms applied to it were just impossible!

“You had to play that for days and weeks and then if you’re lucky to have some winnings you can then withdraw. It doesn’t STOP there as you try to withdraw and even then they try to hold onto the winnings by having a “reversal “button which I believe has been stopped now. The industry has tried all sorts to keep gamblers gambling. All this needs to STOP now!”

Hussain Vorajee, Gloucester

“Wagering requirements were the start of my downfall. I was just opening dozens and dozens of online gambling accounts for the first time – it had all been in the bookies before. I was very quickly hooked, in a matter of days really, I started on the online slots and casino games.”

Sam Wood, Leeds



“Wagering requirements can be up to 250x the wins off the free spins before you can withdraw, but by the time you do this, they have all your details, so they can then send all sorts of promotions and other “free” bets.

“And as we all know, it doesn't take too long until you are putting your own money in. It is morally wrong. You don't walk into a pub, and they offer you free beer do they? It's naughty to say the least.”

Anonymous, London

Considering the above, we fully support complete ban on all wagering requirements.

Furthermore, the types of offers and promotions that include wagering requirements often include cross-product incentives and offers, pushing customers toward riskier and more addictive products. We will cover this in detail in the relevant part of the consultation.

References:

1. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7704449/>
2. https://acquire.cqu.edu.au/articles/report/Effects_of_wagering_marketing_on_vulnerable_adults/13447859
3. <https://www.gamblingcommission.gov.uk/about-us/guide/consumer-experiences-and-attitudes-to-free-bets-and-bonuses>
4. <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/exploring-consumer-journeys-using-gambling-promotional-offers-and-incentives>
5. <https://www.monstercasino.com/landingpage/welcome-offer-UK/?tracker=236000&dynamic=5553ga1016463cid6ZYMRD2GOV5ICB7Gpidaffid1013993>

13. To what extent do you agree with the proposed option B to cap wagering requirements?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer

As stated in our previous answer, wagering requirements are dangerous and deceptive.

They must be banned – not capped.



We note that the consultation document states that “our engagement with gambling licensees identified that ... it is necessary to have ... wagering requirements to prevent customers from taking ‘free’ money derived from the winnings of a bonus.”

This seems to be saying that a customer can have a “free bet” as long as it is not truly free. It feels akin to operators limiting the amount that a ‘winning customer’ is allowed to bet on their account: you can bet as long as you don’t win too much. It exposes the truth behind wagering requirements: they are designed as a method of luring customers in to play for a significant length of time with the hope that they develop a habit or worse. They should have no place in the gambling landscape.

14. If wagering requirements were to be capped, which threshold do you prefer?

Up to a maximum of 1 time

Up to a maximum of 5 times

Up to a maximum of 10 times

Please give your reasons, including any evidence, for your answer

We see no evidence to justify wagering requirements. If they are not banned, they should be capped at the smallest amount possible to discourage excessive play and minimise subsequent risk of addiction.

15. Do you have any further comments on these proposals?

Incentives and inducements of all kinds can make it very difficult for people being harmed by gambling to abstain from gambling – the Gambling Commission’s own research (1) found that people harmed by gambling are nine times more likely to receive daily incentives to gamble than those unharmed. Indeed, incentives and inducements can also draw people in recovery from gambling addiction back into gambling.

We are concerned that this consultation focuses too much on financial incentives and the financial harms associated with wagering requirements – gambling addiction is a mental health condition, and gambling harm can occur at a relatively low level of spend. For many bereaved families their loved one died without losing huge amounts of money over a short time.

Time spent gambling is a huge factor in risk of harm/ addiction and wagering requirements clearly incentivise gambling for prolonged periods of time.

Proposals to change the features and structure of incentives should be considered as a single element of a wider approach that must include changes to the gambling environment, the availability of gambling products and the design of products – stake size and spin speed for example.

Hing et al’s findings (2) corroborate this point:

“Consistent with a public health approach, measures to reduce and regulate wagering advertisements and inducements need to be supplemented by measures to reduce the



environmental, structural and situational factors that interact with wagering marketing to normalise betting and contribute to betting-related harm.”

We are also concerned that people do not sufficiently understand the terms and conditions for wagering requirements and indeed for many other incentives, which can result in increased likelihood of harm. Again, the Hing et al research concludes:

“Misperceptions about the likely returns from wagering inducements indicate a need for consumer education and operator care in advertising, as well as banning or restricting play-through conditions. Direct messages are particularly problematic and require restrictions or stringent opt-in requirements.”

This point supports our call for a full ban on wagering requirements and inducements.

Finally, this consultation should also consider restricting the number of spins which are offered as an incentive. It is not uncommon for operators to offer 500 “free” spins. This is not intended merely to give the customer a chance to ‘experience’ a product: it is clearly designed to keep a customer playing for a significant period of time and to develop the immersive experience (3) which can so often be the gateway into addiction.

References

1. <https://www.gamblingcommission.gov.uk/about-us/guide/consumer-experiences-and-attitudes-to-free-bets-and-bonuses>
2. https://acquire.cqu.edu.au/articles/report/Effects_of_wagering_marketing_on_vulnerable_adults/13447859
3. [https://www.greo.ca/Modules/EvidenceCentre/files/Arshad%20and%20Clark%20\(2022\)_Immersion%20in%20substance-related%20and%20behavioural%20addictions_final.pdf](https://www.greo.ca/Modules/EvidenceCentre/files/Arshad%20and%20Clark%20(2022)_Immersion%20in%20substance-related%20and%20behavioural%20addictions_final.pdf)

16. Do you have any comments about implementation issues, timelines and practicalities?

Please give us your views below

A full ban on wagering requirements should be implemented as soon as possible.

17. Please provide an estimate, including any evidence, of the direct costs associated with implementing these proposals, identifying to which proposals the estimated costs relate.

Please give us your views below



NA

18. To what extent do you agree with the proposal to ban the mixing of more than one type of gambling product within an incentive?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer

Our position is that all forms of gambling advertising and marketing should be banned.

The experience of the GwL families, combined with the evidence quoted by the consultation, notably the Health Survey for England 2018 (1), clearly demonstrates that customers who gamble on multiple products are at much higher risk of suffering gambling harm. Therefore, we believe that no-one should be encouraged, incentivised or cross-sold different gambling products, especially within the same incentive or offer.

Furthermore, certain gambling products are much more addictive and harmful than others. Characteristics that make products more addictive include speed of play and 24/7 availability, accessibility via smartphone.

Online casino and slot games are among the most harmful products, with some of these carrying addiction and at-risk rates of up to 45% (2). It is inevitable that the overwhelming majority of people who gamble on these products will eventually lose.

The urgency for action is clearly demonstrated by the fact that the use of products such as online slots is increasing. The figures also demonstrate a substantial increase in dangerous play as characterised by excessively long sessions. According to the Gambling Commission's latest figures (3):

- slots GGY increased 6 percent to £618 million YoY. The number of spins increased 11 percent, while the average monthly active accounts in Q3 increased 8 percent to 4 million per month.
- the number of online slots sessions lasting longer than an hour increased by 3 percent YoY to 9.8 million.

Highly addictive products like online slots, combined with aggressive industry marketing practices, such as cross-selling, form the foundations of the online gambling industry's harmful business model – 86% of gross online profit comes from just 5% of gamblers, many of whom are addicted or at serious risk of addiction.

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Cross-selling – inducing gamblers to move to different, often higher risk products – is one of the most dangerous practices used by the industry. This is evidenced by the experience of the GwL families, several of whom lost loved ones who had been cross sold highly addictive and dangerous slot and casino-style games, which had a catastrophic impact.

Furthermore, many people with lived experience of gambling harm have told us they feel strongly they would have never used an online slot product without being incentivised to do so. No-one should be induced to gamble on different products, and we therefore fully support this proposal.

In one case the young man had been gambling to any extent for just seven months. He had begun mainly betting on UK football matches. Over time he received emails encouraging him to bet on football matches all over the world and was eventually offered inducements to engage in higher risk in-play betting and play casino products. The frequency and scale of his gambling increased as he started to use these higher risk products, and the inducements from the operator surged as his gambling escalated, pulling him further into harm.

At one time he received a “safer gambling” email, suggesting the operator was concerned about his gambling, but just 14 days later the same operator offered him 20 free spins on eligible slots, the product category known to be the highest risk. He took his own life aged just 19 on the day he lost his last pound playing a casino product.

References

1. <https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2018>
2. <https://www.gamblingwithlives.org/wp-content/uploads/2022/01/Addictive-Gambling-Products.pdf>
3. <https://www.gamblingcommission.gov.uk/news/article/market-impact-data-on-gambling-behaviour-operator-data-to-dec-2023>
4. https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final.pdf

19. Do you have any comments about implementation issues, timelines and practicalities?

Please give us your views below

We agree that a full ban on mixing different gambling products within incentives should be implemented immediately.

However, we believe that the restriction should be stronger than this. As previously noted, we do not believe that there should be any inducements to gamble. However, if that restriction is not implemented, we believe that no one should receive an inducement for a form of gambling which they are not already engaged in.



A person involved in sports betting should not receive marketing or incentives for casino or bingo, say. We are aware that this is partially covered by other consultations but believe that it must be explicitly covered within the operation of incentives rather than just marketing.

20. Please provide an estimate, including any evidence, of the direct costs associated with implementing this proposal

Please give us your views below

NA

Customer-led tools

We have been exploring the role of customer-led tools as part of our wider work on online protections, including considering how easy it is to set and keep meaningful account limits. We are consulting on proposed changes to the Remote Gambling and Software Technical Standards (RTS) to make sure that consumers who want to make use of pre-commitment tools such as deposit limits can do so easily, in ways that work for them and with the minimum of friction.

To inform future thinking, we are also seeking views on consumer ability to choose limits across accounts held by multiple operators, and on any concerns or specific examples where consumer decision-making has been influenced or encouraged through the use of friction or other barriers.

26. To what extent do you agree with the proposal that offering facilities to set limits should be a requirement rather than implementation guidance?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

We are strongly in favour of customer-led tools such as limit-setting becoming a mandatory requirement rather than guidance. It is crucial that these limits apply to both the amount of money



and time spent gambling – harm can occur at relatively low levels of spend, so time spent gambling is a crucial marker of harm that should not be overlooked. We strongly recommend that time limits apply to both the length of time of any given gambling session and the total time spent gambling per day.

We note that the research base for this area is inadequate, with most existing studies commissioned by the industry, and that online gambling operators currently have no incentive to introduce measures that may impact their bottom line – the business model for online gambling is currently based on harm, with 86% of profit made from 5% of customers. Guidance is unlikely to be followed by some operators, therefore, offering customer-led tools must be mandatory.

Considering this, we recommend that independent research into the effectiveness of customer-led tools is commission as a matter of urgency, looking into levels, mandatory nature, and other important areas. Until a robust evidence base has been gathered, the precautionary principle must be adopted.

It is important to state that customer-led tools can – and should – never be a replacement for proper regulation and customer-wide measures, such as affordability checks and game design to make products safer. We cannot build an effective population-wide safety model which relies on individual responsibility, which is the essence of customer-led tools. These points are fundamental to our view and apply to multiple questions throughout this section.

Despite the PR from the gambling industry, there is little independent evidence or research to suggest that the current set of tools have a substantial impact, especially for people with gambling disorder – those most at risk of suffering serious gambling-related harms.

Indeed, in 2023, the coroner at the inquest into the death of Luke Ashton, who died by gambling-related suicide in 2021, raised several concerns relating to player protection tools. In his prevention of future deaths report, (1) the coroner wrote:

“I remain concerned that the player protection tools, as mentioned above, were and are inadequate to protect a person such as Mr. Ashton, who was a problem gambler with a worsening problem, specifically that such tools do not amount to any or any meaningful interaction with the gambler, or any intervention into the practices of the gambler.”

Currently there are no mandatory requirements to set spending or time limits at the start of play and no mandatory agreed methods of monitoring play with a view to intervening once problematic gambling sessions are identified, as highlighted by the coroner at Luke Ashton’s inquest. And crucially, there is no robust independent research which proves that they work.

The requirement that gambling operators allow customers to self-exclude is arguably a unique condition for any legal product and a clear indication that gambling is not an ordinary product, and should not be treated as such. Self-exclusion is clearly a powerful tool. Considering this, the process must be quick and simple: it should be possible to sign up to lifetime exclusion and the cancellation of any exclusion should require a cooling off period of at least 48 hours.

We recommend that current tools are significantly upgraded.

The overwhelming consensus among people recovering from gambling disorder and affected others is that the current tools are ineffective. By placing emphasis on individual behaviours, such as “taking breaks”, “tapping out”, setting time or monetary limits and self-excluding, these tools fail to



recognise that addictive behaviours are based on artificially induced behavioural need rather than a rational or willing choice.

We spoke to a mentor at an NHS Gambling Clinic who said:

“Our service users tell us that user-controlled tools are counter-productive because they actually raise anxiety levels even more as when they’re aware they are coming to these limits where they have to stop, then they just change them and end up gambling more than they intended.”

Addiction robs the individual of their cognitive capacity (2), increases risk taking and impulsivity so that capacity for rational decision making while engaged in gambling is severely reduced. This indicates that messages, voluntary controls, or limits cannot be effective.

Research by Frontiers in Psychology (3) supports this point:

“The prompt to set a voluntary, removable deposit limit of optional size did not appear to be effective in reducing gambling intensity in users of an online gambling platform with online slot machines as the preferred gambling category.”

Their findings are further supported by a report from the APPG’s Online Harm Enquiry (4), which concluded:

“Yet despite the existence of these tools, there is little evidence to establish the effectiveness of setting deposit or loss limits on online gamblers. Indeed, there is research which raises questions about the use of responsible gambling tools by gamblers. The Behavioural Insights Team has said “setting limits [by gamblers themselves] were generally perceived as ineffective as they could easily be reset within a relatively short time period”.

In summary, we agree with the proposal that customer tools should be mandatory. However, they must be expanded to include ‘hard stop’ measures which prevent someone from continuing their gambling for a substantial period of time or until there has been a specified real interaction, and limits must not be easily overturned or reset.

As highlighted earlier, customer tools will not work in isolation and must be accompanied by population wide restrictions on stake sizes, spend, time or affordability measures.

References:

1. <https://www.judiciary.uk/prevention-of-future-death-reports/luke-ashton-prevention-of-future-deaths-report/>
2. <https://www.sciencedirect.com/science/article/abs/pii/S0278584619307304>
3. <https://www.frontiersin.org/journals/psychology/articles/10.3389/fpsyg.2019.00639/full>
4. <http://www.grh-appg.com/wp-content/uploads/2019/11/Interim-APPG-Report-November-final-1.pdf>

27. To what extent do you agree with the proposal that for access media (such as interactive TV) limits must only be offered to consumers using free text?



Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

We are concerned that using free text could create an extra barrier to setting a limit.

However, free text does provide customers with more choice and the evidence (1) appears to bear this out with free text leading to lower limits, when compared to drop down.

References

1. <https://www.bi.team/wp-content/uploads/2021/01/Remote-Interventions-gambling-anchoring-report-Final-Jan-15th-2021.pdf>

28. To what extent do you agree with the proposal that implementation guidance states that operators could provide links to tools or resources to support limit-setting as part of the process?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

We support this proposal. However, it is crucial that it is implemented properly, and that linked resources are independent and properly scrutinised – they must be clear and not contain any messaging that perpetuates the individual responsibility narrative. We believe that any messaging or instructions should be developed or approved by an independent 3rd party such as the Gambling Commission.

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29. To what extent do you agree with the proposal that limits must be applied at the account level?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

Most people who gamble online have an average of three accounts (1), with people suffering harm likely to have many more, which renders having a limit on a single account completely ineffective. Therefore, for spending limits to be effective, they must be applied across the customer's entire experience – and not just individual accounts with a single operator.

The development of the Single Customer View (SCV) must be completed and implemented as soon as possible. However, it must go beyond the current specification to allow operators to share 'flags' on individual gamblers. It must have the capability of allowing consideration of an individual's complete gambling experience and for restrictions to apply across all elements for an individual, whether through population wide restrictions or customer-led action.

References:

1. <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/taking-a-more-in-depth-look-at-online-gambling>

30. To what extent do you agree with the proposal that gambling licensees can also continue to offer financial limits at the product or channel level in addition to account level limits?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below



First, we believe that this should not be an optional offering by licensees: they MUST offer financial limits at the product/channel level.

As indicated in previous consultations, we believe that there should be maximum stake levels for particular products such as online casino, slots and bingo.

As evidenced earlier in this consultation and elsewhere, different products carry significantly different levels of risk of harm. Therefore, it is important that industry-wide maximum stake limits are applied but that customers are also empowered to limit their spending on certain channels and products.

31. To what extent do you agree with the proposal that gambling licensees should clearly communicate to customers how product/channel limits work?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

Gambling operators should be transparent with customers and explain limit setting to them in the simplest terms possible, giving examples. As discussed in the previous section on “free” bets and inducements, licensees have demonstrated their inability or unwillingness to present clear understandable instructions and explanations for customers. Therefore, these communications should be developed or approved by an independent organisation.

32. To what extent do you agree with the proposal that the gambling licensees should determine whether customers holding multiple accounts wish to apply limits across all accounts held?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below



Limit setting must be applied across all operators and accounts to be effective – gambling operators must have no influence over this, and it must be the default setting. As noted, the development and implementation of a SCV system, operated by a 3rd party which is entirely independent of individual operators or industry funded bodies, is essential.

33. To what extent do you agree with the proposal that gambling licensees should inform customers about how limits set across simultaneous timeframes work, when a customer chooses to set multiple limits?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

It's important that gambling operators are transparent with customers and explain limit setting to them in the simplest terms possible. As noted above, all messaging must be developed or approved by an independent third party.

34. To what extent do you agree with the proposal that the gambling system must offer deposit limits as a minimum?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

To be effective, limits must apply to both deposits/ overall spend and time spent gambling as a minimum.



35. To what extent do you agree with the proposal that the gambling licensees should continue to have the option to offer spend and/or loss limits, in order to maximise consumer choice?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

As noted above, these voluntary tools are believed to be effective in reducing harm.

Therefore, they should be mandatory across all operators rather than being treated as another element of marketing.

36. To what extent do you agree with the proposed definition of spend limits as a tool “where the amount a customer spends on gambling (or specific gambling products) is restricted for the period/duration of the limit applied”, for the purpose of RTS 12 – Financial limits?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

Whilst financial limits are important, gambling harm can occur at a relatively low level of spend, with time spent gambling an equally important measure of harm.

Therefore, we propose that this consultation also consider adding an equivalent definition to the RTS about time spent gambling with appropriate restrictions.



37. To what extent do you agree with the proposed definition of loss limits as a tool “where the amount lost is restricted, i.e. winnings subtracted from the amount spent for the period/duration of the limit applied”, for the purpose of RTS 12 – Financial limits?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

38. To what extent do you agree with the proposal that financial limit facilities must be provided via link on the homepage and clearly visible and accessible?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

The facility to apply spending limits must be clearly visible and easy to access, not hidden away.

39. To what extent do you agree with the proposal that financial limit facilities must be provided on or via link on deposit pages/screens and clearly visible and accessible?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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Please give us your views below

40. To what extent do you agree with the proposal that links to limit setting facilities from communications should link directly to the facilities unless security settings require an intermediate log in?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

41. To what extent do you agree with amended wording in relation to controls around actioning customers' requests to increase limits?

(All reasonable steps must be taken to ensure that customer-led limits are only increased at the customer's request, only after a cooling-off period of 24 hours has elapsed and only once the customer has taken positive action at the end of the cooling off period to confirm their request.)

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

We recommend extending the cooling-off period to 48 to 72 hours, which is the standard period used by banks offering a gambling blocking facility.



42. To what extent do you agree with the proposal that customer-led reductions in limits must be implemented immediately?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

We fully agree with this proposal.

As noted above, gambling disorder can rob the individual of their cognitive capacity, so that any time that an individual is conscious that they are being harmed by gambling and is prepared to take action, it's important that they can limit their gambling spend and access immediately before their gambling disorder takes hold.

43. To what extent do you agree with the revised wording of the implementation guidance, specifically to inform customers when the limit reduction will take effect, if not automated or due to technical issues?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

44. To what extent do you agree with the proposed implementation guidance that gambling licensees should alert customers when they are approaching their limits?

Strongly agree

Agree



Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

The data quoted in this consultation (1) indicates that the majority of people would find a reminder before they reach their limit more useful than as they hit it.

We recommend licensees should contact customers with plenty of time to spare before they hit their limits, i.e. 50 or 60 per cent.

References

1. <https://www.gamblingcommission.gov.uk/about-us/guide/exploring-consumer-journeys-using-customer-led-tools>

45. Do you have any evidence to offer regarding the optimum point when approaching a limit that a customer should receive an alert?

Please give us your evidence below

46. To what extent do you agree with the new requirement for operators to provide activity statements to customers, including information currently required to be made available under RTS 1 – Customer account information?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below



47. To what extent do you agree with the new requirement for this information to be provided every six months for accounts with activity within a rolling 12-month period?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

It's important that customers are aware of their own gambling and gambling expenditure.

48. To what extent do you agree with the new requirement for operators to provide facilities for customers to set the frequency of reminders?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

These should be mandatory and not set by the customer.

49. To what extent do you agree with the new implementation guidance that operators should also provide activity statements to prompt a review of limits at additional appropriate points in the customer journey?

Strongly agree

Agree

Neither agree nor disagree



Disagree

Strongly disagree

Please give us your views below

50. To what extent do you agree with the new implementation guidance that operators should consider ways to share activity statements with customers in order to maximise engagement?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

51. To what extent do you agree with the new implementation guidance that operators should monitor engagement and interaction with activity statements to inform good design and best practice?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

52. To what extent do you agree with the implementation option 1 – presentation of customer-led tools as the default option?

Strongly agree

Agree

Neither agree nor disagree



Disagree

Strongly disagree

Please give us your views below

It concerns us that option 1 would make it too easy to opt out of any customer-led tools.

For customer-led tools to be effective they must be a mandatory account condition.

53. Please add any further comments.

Please give us your views below

54. To what extent do you agree with the implementation option 2 – presentation of customer-led tools as required to participate?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

55. Please add any further comments.

Please give us your views below

56. If you have a clear preference for implementation option 1 or 2, please indicate below?

Implementation option 1 – presentation of customer-led tools as the default option

Implementation option 2 – presentation of customer-led tools as required to participate

No preference

Please give us your views below



57. To what extent do you agree with the proposed new wording of the RTS 12 aim, to reflect the detailed changes set out in this section of the consultation?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

58. Please provide any other information or issues regarding implementation of these proposals that the Commission should take into account.

Please give us your views below

59. Please provide an estimate of the direct costs associated with implementing these proposals.

Please give us your views below

60. Do you have any evidence of the effectiveness of cross-operator deposit limits in reducing gambling harm?

Please give us your views below

61. How do you think cross-operator deposit limits could work in the future, within the context of our regulatory framework?

Please give us your views below

As we have noted in this and several previous consultations, we believe that a Single Customer View (SCV) system which allows the monitoring of the totality of an individual's gambling is essential to the effective implementation of safety measures whether applied on a population-wide basis (such



as Affordability Checks) or through customer-led actions considered in this consultation. The development of the Single Customer View (SCV) must be completed and implemented as soon as possible. However, it must go beyond the current specification to allow operators to share 'flags' on individual gamblers. It must also be developed and operated by an independent 3rd party which does not share data with individual operators or any industry funded bodies.

We are aware that the Gambling Commission has been contacted by at least one independent organisation who would be able to develop, implement and run such as system. But we understand that at present, even after 4 years, the Commission is continuing to pursue the development of an inadequate system in partnership with the BGC.

62. Do you have anything further you wish to add about cross-operator deposit limits?

Please give us your views below

63. Do you have examples or evidence of situations where the architecture and design of gambling facilities creates an imbalance in the gambling licensees' favour and drives consumer behaviour which may not be in their best interests?

Please give us your views below

64. Attaching additional information

Attach additional documents- customer-led tools

Please make sure your file is under 25MB

Choose file

Current file:

65. Do you have any evidence or information which might assist the Commission in considering any equalities impacts, within the meaning of section 149 of the Equality Act 2010, in the context of any proposal considered in this section of the consultation?

Improved transparency on customer funds in the event of insolvency

We want to ensure it is clear to consumers throughout their relationship with a gambling licensee with a 'not protected' rating that their funds are not protected. We want to improve transparency for customers of these gambling businesses and we therefore propose a new requirement be added



to the existing LCCP provision. This is that gambling businesses should remind customers that their funds are not protected.

67. To what extent do you agree with the Commission's proposal to add a specific requirement to the LCCP, which requires gambling licensees with a 'not protected' rating to remind its customers that their funds are not protected in the event of insolvency?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

Gambling operators must always be transparent with their customers, including about the security of their funds.

68. If the proposal were to be adopted, which option do you prefer?

Option A - reminder to customers when value of funds reaches a threshold amount

Option B - reminder sent to all customers irrespective of the value of funds held

Please give us your views below

69. Question relating to option A only: To what extent do you agree with the Commission's proposal to make this subject to a threshold amount for the value of funds held which the customer must reach before the gambling licensee must send the reminder?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below



70. Question relating to option A only: If a threshold amount were to be applied, please indicate which of the suggested values you consider to be appropriate:

£100 £250 £500 £1,000

Please give your reasons, including any evidence, for your answer

71. To what extent do you agree with the Commission's proposal to ensure gambling licensees send a reminder to consumers no more than once every six months that their funds are not protected when the value reaches the threshold amount?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer

72. To what extent do you agree with the Commission's proposal to require gambling licensees to ensure customers acknowledge a reminder before being permitted to gamble?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

It's important that customers are aware of the security of their funds, regardless of the amount.

73. Do you have any comments about the application of this requirement to non-remote gambling licensees and/or the likely scale of impact?

Please give us your views below

74. Do you have any comments about implementation issues, timelines and practicalities?



Please give us your views below

75. Please provide an estimate of the direct costs associated with implementing these proposals.

Please give us your views below

76. Attaching additional information

Attach additional documents- improved transparency on customer funds

Please make sure your file is under 25MB

77. Do you have any evidence or information which might assist the Commission in considering any equalities impacts, within the meaning of section 149 of the Equality Act 2010, in the context of any proposal considered in this section of the consultation?

Changes to the frequency of regulatory returns submissions

Regulatory returns submissions from gambling licensees are a vital source of information for us, government and the public, providing an understanding of the size and shape of the gambling market in Great Britain. Some gambling licensees send us annual submissions, whilst others are submitted quarterly. We are consulting on a change to the LCCP so that all regulatory returns would have to be submitted to us quarterly. This would provide a timelier and more accurate picture of the gambling sector.

79. To what extent do you agree or disagree with the proposed change to regulatory return submissions from annual to quarterly?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give us your views below

For harm prevention purposes, it is essential to have as much data as possible, therefore we strongly support this proposal.

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80. Do you have any comments about implementation issues, timelines, and practicalities?

Please give us your views below

81. Please provide an estimate of the direct costs associated with implementing this proposal

Estimate of direct costs associated with implementing this proposal

82. Attaching additional information

Attach additional documents- changes to the frequency of reg returns

Please make sure your file is under 25MB

83. Do you have any evidence or information which might assist the Commission in considering any equalities impacts, within the meaning of section 149 of the Equality Act 2010, in the context of any proposal considered in this section of the consultation?

Please give your answer below

Removing obsolete Commission requirements due to the government's upcoming statutory levy (LCCP RET list)

The government has recently published its [consultation on a statutory levy on gambling licensees](#) and once the statutory levy is brought into force, it will replace the current system for funding research, prevention and treatment (RET) where the amounts raised are voluntary. We currently require gambling licensees to make an annual financial contribution to one or more organisation providing RET on a list that we maintain. That requirement in the LCCP will become obsolete and we are consulting on removing it once a levy is introduced or at the beginning of the financial year in which a levy is introduced.

85. To what extent do you agree with the proposed change to remove paragraph 2 of SR Code Provision 3.1.1?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree



Please give us your views below

We fully support the move away from voluntary operator contributions to a statutory levy, which will finally bring independence to the research, education, and treatment sector. Therefore, we strongly agree that this wording should be removed.

86. Can you foresee any issues related to the proposed timing for removing this SR Code Provision?

Please give us your views below

87. Are there any additional issues related to the removal of this SR Code Provision, or other practical considerations that we should consider?

Please give us your views below

88. Attaching additional information

Attach additional documents- removing obsolete Commission requirements

Please make sure your file is under 25MB

Choose file

Current file:No file chosen

89. Do you have any evidence or information which might assist the Commission in considering any equalities impacts, within the meaning of section 149 of the Equality Act 2010, in the context of the proposal considered in this section of the consultation?