

RGT Conference

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Harm minimisation in gambling: progress and prospects

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Good morning Minister, Chairman, ladies and gentleman. I am delighted to have been invited to speak to you – albeit briefly – on this important subject.

The ‘rich picture’ and the strategy

Since I took up my new role on 1 October, I have been meeting with a range of different stakeholders including operators, trade bodies, faith groups, and interest groups concerned with preventing and treating harm from gambling. What has become obvious to me is the very rich picture of initiatives across a range of groups, and I thought it might be helpful to take a look at some of the work underway.

The Trust plays a critically important role, of course, and we place a high priority on working constructively and in concert with the Trust and the Responsible Gambling Strategy Board. So, for example, work that the Trust is commissioning around gambling-related harm will help to identify the quantum and nature of resources that are needed to address that harm, and how best to target those resources for maximum impact. And forthcoming work on identifying patterns of play indicative of a heightened risk of harm in the online environment should add to our understanding of what is possible in terms of player protection in that growing market. Our own research, not least into gambling participation and the prevalence of problem gambling, allows us to identify trends and areas of risk, and, at a very high level, to track progress. The betting industry is announcing today some of the work that it has been doing to identify customers who might be at risk of harm. We’ll be hearing about that later. And betting and other sectors have been developing their own codes for tackling responsible gambling. Of course there are many other initiative besides these.

The opportunity of this work, led by what has been described to me (among other things) as a ‘sea change’ in the industry’s recognition of the need to own and act on problem gambling, is that we can reach a deep understanding of a range of measures that can contribute to minimising harm, and at pace. By contrast, the risk with all of this work is that instead of a strategy that sees ‘a thousand flowers’ blooming to great effect, we have a tangle of well-intentioned but uncoordinated, and ultimately less effective activity, progressing at the pace of the slowest.

So it is important that these efforts cohere. As its name suggests, the Responsible Gambling Strategy Board has a key role here. In addition to providing independent expert advice to the Commission, RGSB also formulates a strategy for responsible gambling. A revised version of the strategy is currently out for consultation. It sets out what I think is a clear vision for an industry in which people are able to gamble enjoyably, without harming themselves or others (family, friends, employers).

It makes clear that behind the complex picture I’ve shown here, there needs to be a clear and logical process whereby efforts to improve understanding, help to identify appropriate actions that can be tested, trialled and evaluated. And trialling and evaluation in turn adds to our understanding, so that we can improve on those actions, and so on.

In that spirit of improving our understanding, I thought it might be interesting to share with you just a few findings from an online survey that we conducted recently. It found that almost a third of online gamblers were not aware of available information to help them control their gambling. Similarly, almost a third were unaware of information about where to go to seek help with controlling their gambling.

Encouragingly, awareness and use were much greater amongst problem gamblers, with awareness percentages in the 90s, and usage around 80%. But a successful harm minimisation strategy should be seeking to prevent harm, not just deal with it when it arises.

The survey found a similar story when it looked at awareness and use of the tools that are available to help people manage their gambling online. As you can see, the proportions that had actually used such tools were very small. Again, problem gamblers were more likely to have used the tools, although even then the proportions were still low, with financial limits being the most used at 18%.

There is of course a separate issue around which information and which tools are effective, and there is much to do to improve our understanding. The industry has a critical part to play in that.

The industry's role

I hope it's been clear from what I've been saying that there are many players in this process. As the regulator, a key priority for me personally is to do all that I can to ensure that consumer protection is at the heart of the Commission's decision-making. It has to be so to reflect our statutory focus, which is to aim to permit gambling provided that we think that is reasonably consistent with pursuit of the licensing objectives in the Gambling Act. And those objectives include ensuring that gambling is conducted in a fair and open way, and protecting children and other vulnerable people from being harmed or exploited by gambling.

But I'm also conscious that the industry, meeting fully the ambition of its licence obligations, is best placed to take many of the actions that ultimately help to protect customers. Working well, this would see operators focus on their consumers first (and less on the regulator), and bringing innovation to bear wherever they can on the way in which good consumer outcomes are met. Implicit in innovation is that some measures will fail as well as succeed – the key is the learning.

As I have said, I have heard – even in the short time that I have been in post – much about the will in the industry to make progress on the social responsibility and consumer protection agenda, and I have heard something of the examples of that progress.

As the regulator, we have a responsibility to challenge the industry to deliver and maintain its progress. In general, we would like to see much greater pace and clear evidence that operators are applying the same kind of intellectual and commercial expertise, and innovation, to social responsibility, that is brought to efforts to compete in the market. At an individual operator level, there will be an important opportunity for the Commission to assess industry progress in meeting these challenges, when we receive the first of around 40 annual assurance statements which are due next February.

At an industry-wide level, I want to set out some of the things we will look for as the industry approaches current and future social responsibility initiatives. We will want see evidence of:

- **Clarity of purpose:** is the work operators are doing on social responsibility aimed at preventing harm or just dealing with it where it is already occurring? We think it should be part of a committed and sustained agenda around effective harm minimisation.
- **Evaluation:** is there a transparent framework for this and, over time, how will operators report their findings? RGSB has been doing some work with support from the Trust on an evaluation protocol, which should certainly help in this respect. Amongst other things, it will highlight the importance of sharing findings and methods. And I should say that the Commission is keen to assist in this in whatever way makes sense.

- **Added value:** are operators doing the minimum, or taking their responsibilities further?
- **Customer focus:** are businesses considering every aspect of the customer journey, including where it begins, with marketing and advertising? In our compliance work, for example, we have found examples of potentially misleading marketing within the remote gambling sector, and we are taking action to address that.
- **Transparency:** will operators take stakeholders with them, and be open about the inputs to work, as well as the conclusions and actions? The challenge for everyone in this room is to engage those beyond it - representatives of the public, consumers, the media, communities such as the faith groups, and other stakeholders.

These aspects provide a framework within which operators can test their own progress in their social responsibility work. And, let's be clear, the industry really has to be at the top of its game, placing social responsibility at the heart of what it does. It has to be able to build public confidence that gambling merits its place as a legitimate leisure activity, subject to a firm but balanced regulatory regime under which it can develop and grow.

Closing remarks

We will be hearing, through the course of the day, aspects of much of the work that I've mentioned. We've heard from the Government and now from the Commission. And we'll be hearing from the industry, from the research community, the Trust, the Responsible Gambling Strategy Board and other stakeholders. Realistically, we are likely to hear some disagreement and some challenge – and that is only right and proper. But I hope and expect that we will also hear some common themes, a sense of shared objectives, and the translation of commitment, into innovation and action to minimise gambling-related harm.