
Proposed changes to LCCP requirements for customer interaction and alternative dispute resolution, and call for evidence on gambling website blocking software

Overview

Consumers, gambling operators and members of the public are being invited to voice their opinion on proposed changes to Licence Conditions and Codes of Practice (LCCP) and to provide views on gambling blocking software.

LCCP consultation on Customer Interaction

We are consulting on changes to the LCCP social responsibility (SR) code provision 3.4.1 (Customer Interaction) and associated ordinary code provision 3.4.2.

These code provisions apply to all types of operating licence except non-remote lotteries, gaming machine technical, gambling software and host licences. A separate code provision applies to all lotteries, which are out of scope of this consultation.

This consultation will be of particular interest to gambling businesses, but responses are welcomed from all stakeholders, in particular consumers who may wish to bring their own experiences into this discussion.

LCCP consultation on alternative dispute resolution (ADR) - requiring licensees to only use providers that meet our additional standards

We have been looking closely at how complaints processes in the gambling industry are working for consumers. Part of that review focused on the provision of ADR.

All ADR providers must meet the requirements in government regulations. We decided to set out a framework of extra requirements for ADR providers in the gambling sector. The framework would include standards around customer service, decision making and supporting the gambling industry. Our aim was to make the role of an ADR provider clearer, improve consistency, and help to

reassure consumers that a provider is independent of the gambling business. We would then review all approved providers against the additional standards in our new framework.

A call for evidence on gambling website blocking software

We would like to obtain views on whether we should extend the existing expectation (that operators should signpost blocking software to consumers) so that operators have to provide access to gambling blocking software free of charge to customers. We would also like views on how this could most effectively be delivered.

Why we are consulting

We are conducting a formal consultation under Section 24 of the Gambling Act 2005 on proposed amendments to the LCCP requirement for gambling businesses to carry out customer interaction, as set out in our Business Plan 2018 - 19 and in our Online Review submitted to Government to support the Review of Gaming Machines and Social Responsibility Measures.

The proposed changes are intended to raise industry standards and accelerate progress around customer interaction, in order to prevent harm to consumers.

We are also consulting on whether we should require gambling businesses to name only ADR providers who meet our additional standards, as well as the requirements of the ADR regulations. This would give an incentive to ADR providers to meet our additional standards, because those that did not could not be used by gambling businesses. It would also make sure that consumers receive a consistent service from any ADR provider in the gambling sector.

Introduction

1 What is your name?

2 What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

3 Please indicate which organisation you belong to?

For example, member of the public, gambling operator, trade association, charity etc

4 Privacy notice

As part of these consultations and call for evidence, we may decide to publish your name and organisation on our website to indicate that you have responded. We have asked you to indicate your consent to the Commission publishing your name and organisation to indicate you have responded to these consultations and call for evidence.

(Required)

Please select only one item

I CONSENT to the publication of my name and organisation to indicate I responded to this consultation

I DO NOT CONSENT to the publication of my name and organisation to indicate I responded to this consultation

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Please choose which part you wish to respond to first

There are three different elements to this consultation:

- A consultation on proposed amendments to LCCP requirements for customer interaction
- A consultation on proposed amendments to LCCP requirements for alternative dispute resolution- requiring licensees to only use providers that meet our additional standards
- A call for evidence on gambling blocking software.

We welcome a wide range of views to all three and these can be taken in any order that you wish.

Which part do you wish to respond to first?

Select an option from the drop down list

Please select only one item

- Consultation on Customer Interaction Consultation on ADR
- Call for evidence: Blocking software

Introduction

Customer interaction describes how gambling businesses identify and interact to assist customers who may be at risk of or experiencing harms associated with gambling.

We do not restrict this definition to individuals who may identify themselves as 'problem gamblers' according to the Problem Gambling Severity Index (PGSI) or Diagnostic and Statistical Manual of Mental Disorders IV (DSM-IV) scale. By gambling harms, we mean the broader impacts on health, wellbeing and relationships that gambling could cause or be a contributing factor towards. This includes those who may be experiencing moderate levels of harms, or at an increased risk of experiencing gambling harms.

We have made it a priority of our Research Programme to implement the framework for measuring gambling harms in order to target action where it is most needed to reduce those harms. The framework categorises harms into resources, relationships and health.



For regulatory purposes, we expect gambling operators to be able to identify *customers* who may be at risk of or experiencing harms associated with gambling, through observation or detection of a customer's gambling behaviour or activity.

Background

We last reviewed and updated the LCCP requirement for customer interaction as part of our **Strengthening Social Responsibility review**

<https://www.gamblingcommission.gov.uk/PDF/consultations/Strengthening-social-responsibility-LCCP-responses.pdf> . This led to changes to SR code provision 3.4.1 including the introduction of a requirement to *take into account relevant information to ensure effective decision making and to guide and deliver effective interactions* in 2015.

Since then, we have seen an increase in efforts by gambling operators to develop technological solutions to identify problematic play in remote gambling, in particular through greater use of data analytics and algorithms, leading to more sophisticated methods of identifying harmful gambling activity.

There has been more research in identifying the types of behaviours that could indicate a customer is experiencing harm, as well as efforts to improve messaging and the types of interventions that could encourage safer gambling. We are driving further research to improve our understanding of the impact of problematic gambling through the development of a framework for gambling harms, which will enable us to measure the sometimes 'hidden' impacts and costs associated with gambling harms on individuals, on those close to them, and the wider community or societal impacts.

We have seen progress being made by the industry to work collaboratively together to share their own practices, facilitated by the Gambling Commission (the Commission) or the industry itself. In the last 12 months in particular, more and more gambling businesses have worked together on a shared understanding of what gambling-related harm looks like, how this can show itself in their customers' behaviours, and ways to interact effectively with those customers to reduce the risk of harm.

Remote Gambling Association – using behavioural analytics to identify harmful play

In February 2018, the Remote Gambling Association (RGA) published its own guidelines for members on using behavioural analytics to identify harmful play, as a part of customer interaction in remote gambling. Since then, the RGA has held quarterly workshops to collaborate and work together on ways to effectively identify harm, starting with operators sharing good practice and moving towards more practical sessions, to a focus on evaluation.

We have also seen gambling operators engage more in research into how to identify customers who may be experiencing harm. There has been active engagement and participation in research to test different targeted interventions, based on behavioural economics or 'nudges', to identify approaches which encourage safer gambling by customers.

However, while technological advancements in how to identify customers who may be at risk of or experiencing harms associated with gambling are welcome, it is clear from our compliance and enforcement casework that many parts of the industry are still not carrying out the basics, and some customers remain at a higher risk of experiencing harms associated with gambling, which continues to be under-detected.

As published in our recent **enforcement report**

<https://www.gamblingcommission.gov.uk/PDF/Raising-standards-for-consumers-enforcement-report.pdf> , other regulatory action and public statements, there remain weaknesses across the remote and non-remote sectors in identifying and interacting with customers who may be experiencing harm associated with gambling. These weaknesses are largely consistent across many operators, in some cases with repeated failings by single operators. This suggests that some operators are not fully taking into account the lessons learned from enforcement cases to improve their own policies and procedures, and that identifying and reducing the risk of harm still presents a significant challenge.

Case studies in the report identify instances of:

- Failure to adequately interact with VIP customers who were displaying clear signs of harm associated with gambling
- Failure to have in place written policies and procedures that could have curbed the gambling behaviour
- No evidence of any customer interactions taking place despite significant deposits being made and losses incurred by the customer.

The report includes a number of key questions for operators to ask themselves in relation to customer interaction and identifying problem gamblers.

There are three themes that consistently come through our casework and compliance activity. These themes are consistent with the views of the Responsible Gambling Strategy Board (RGSB) in its two progress reports against the National Responsible Gambling Strategy 2016-19:

- Failure to identify harmful gambling activity due to the licensee having insufficient or ineffective indicators and triggers, excessively high and/or unrealistic monetary and time thresholds, and inadequate or ineffective monitoring processes;

- Failure to interact promptly or effectively when a customer exhibits indicators of harm, either through making unjustified assumptions about what gambling behaviour is 'normal' or being slow to react; and
- When an interaction has taken place, there is little or no attempt to monitor activity or understand the impact of the interactions, or to evaluate the effectiveness of policies and procedures, all of which would help deliver continuous improvement.

The most widely used measure of problem gambling in the population comes from the **combined health surveys of England, Scotland and Wales**

<https://www.gamblingcommission.gov.uk/news-action-and-statistics/news/2018/Latest-combined-Health-Survey.aspx> . This survey takes the responses to a series of questions about an individual's gambling, which gives a score on a numerical scale, out of 27. According to this measure, an individual who scores eight or more is defined as a 'problem gambler'. A score between three and seven denotes an individual is experiencing a "moderate level of problems leading to some negative consequences". This definition is commonly referred to as 'at-risk'.

When referring to the prevalence and severity of problem gambling, RGSB has recommended that we no longer use the definition 'at-risk', as this suggests a misleading impression that gamblers who are experiencing a *moderate level of problems* are on the road to a higher classification, whereas empirically, the likelihood of progression to a score of eight or more is low.

Further, this recommendation highlights that we should not so much be worried about the possibility of individuals getting worse and progressing to full 'problem gambling', but rather concerned that they are likely to be experiencing harm *now*, and that this should be addressed now.

In this document we have adopted the recommended PGSI definition.

Customer interaction in the context of safer gambling

In this consultation we are seeking your views on our LCCP requirements for customer interaction – identifying and interacting with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This is part of a range of measures that we think are necessary to make gambling fairer and safer. In our corporate strategy we set out our commitment to inform and empower consumers to manage their gambling in ways that work for them. Our work in this area will also include looking at the right information customers need to make informed choices, the right tools to help customers manage their gambling, and the effectiveness of help and support when it is needed.

Our latest Health Survey data published in September 2018 identifies that past year rates of participation for online gambling continued to grow. As part of our **Review of Online Gambling** <<https://www.gamblingcommission.gov.uk/PDF/Online-review-March-2018.pdf>> we identified a need to assess the effectiveness of current consumer protections, by which we mean the range of tools that operators provide to enable customers to manage their gambling. This would include an assessment of whether other more effective tools should be implemented, and ways to encourage more customers to use the tools from the start of, and throughout, their gambling.

We expect operators to trial and evaluate some of these options, so we can better understand the protections that work best for consumers. We will shortly be calling for evidence around strengthening consumer protections on category B machines. For more information, please see the **consultation hub** <<https://www.gamblingcommission.gov.uk/news-action-and-statistics/Consultations/consultations.aspx>> on the Gambling Commission website.

We know that issues such as how much a consumer can afford to spend on gambling will vary amongst different consumers, which is why some of the more effective processes for identifying harmful gambling activity rely on changes to a customer's usual gambling preferences and behaviours. This however is not an effective way to manage the risks presented by *new and unknown* customers who have not built up a 'gambling pattern'. One of the ways that operators could manage the risks for new customers is through the imposition of account limits, or 'back-stops', that for example prevent customers depositing above a set amount of money until further information about the customer has been verified. But these simple monetary thresholds for interacting with customers could only be effective if set at a realistic level which the majority of consumers could reasonably afford. They are ineffective as a sole indicator or trigger.

Where the evidence proves a case for action to protect vulnerable people, we will consider how thresholds could be implemented to more consistently reduce the risk of harm.

Our current approach to customer interaction

In February 2018, the Gambling Commission published guidance for customer interaction for remote gambling operators. This followed a review of current practice and set out the Commission's interpretation of the current LCCP SR code provision 3.4.1, some suggestions based on research and current practice on how to meet our expectations, and some key questions to consider. Feedback from stakeholders has indicated that this guidance was well received, and that equivalent guidance for customer interaction in non-remote gambling would be welcomed.

We did not propose changes to LCCP at that time because we wanted to continue to establish the evidence base and better understand current customer interaction practices in the non-remote sectors, which we have now done.

Identify - interact - evaluate

The guidance we published in February 2018 expanded more explicitly on what we mean by the process of customer interaction, specifically:

- More clarity on what should trigger or prompt an interaction
- A greater emphasis on the importance of interacting appropriately and in good time
- The need to evaluate the impact of the interaction on the customer's activity, and continually review and assess the effectiveness of the approach.

Our review of current practice in non-remote gambling premises was consistent in its findings. We propose to amend the LCCP requirement to reflect this.

Our approach - the new LCCP

We propose to rewrite SR code provision 3.4.1 to focus more on the **outcomes** that we want operators to achieve; that is, to minimise the risk of customers experiencing harm associated with gambling.

Our experience through compliance activity and case work suggests that a prescribed set of requirements can lead to assumptions amongst operators that simply following a 'checklist' will mean that harm cannot occur, or that the operator is in any case compliant. We do not think this is an appropriate approach to customer interaction, as operators may focus on compliance with technical details rather than on achieving the key outcome that the code provision intends.

The proposed wording:

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 1. identifying customers who may be at risk of or experiencing harms associated with gambling.
 2. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 3. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

This proposal sets out the outcomes that we expect operators to achieve – to minimise the risk of customers experiencing harms associated with gambling.

The proposal also requires gambling operators to take account of guidance on customer interaction. We have included this proposed guidance with this consultation, in the section **guidance**.

We propose to remove the more specific elements outlined in the current social responsibility and ordinary code provisions. However, this does not mean that those elements no longer play a part in effective customer interaction. Practices which are shown by evidence to be essential to delivering effective customer interaction are included in the guidance.

In the following sections, we discuss each of the elements of the proposed Code in more detail.

Do you agree with the proposed approach that the SR Code Provision focuses on the outcomes that gambling operators must meet - that is, to identify and interact effectively with customers who may be experiencing harms associated with gambling?

Please select only one item

Yes No Neither agree nor disagree

If you don't agree, please explain why?

Identify

Proposed wording:

Social responsibility code provision 3.4.1

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1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
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 3. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

Not all customers who may be experiencing harms will display signs in the same way, and what may be indicative of healthy and controlled gambling activity in one individual could be harmful in another.

In order to increase the likelihood of identifying harmful gambling, operators need to use a **range of different indicators** that are appropriate to the gambling product, the environment and **what is known about the customer**, or can be inferred. These need to be supported with robust, proportionate and **effective systems for monitoring and recording**.

The indicators will vary depending on the type of gambling. This is not an exhaustive list or minimum requirement. Examples of indicators can be found in the **PWC remote gambling research** <http://about.gambleaware.org/media/1549/gamble-aware_remote-gambling-research_phase-2_pwc-report_august-2017-final.pdf> and our latest **Health Survey data** <<https://www.gamblingcommission.gov.uk/news-action-and-statistics/news/2018/Latest-combined-Health-Survey.aspx>> is useful. Operators must use the appropriate indicators for their business, based on research, experience and shared practice. These may include:

- Time – such as the frequency of gambling sessions or visits, the length of time spent gambling and the time of day of the gambling session.
- Money – the amount of money deposited, the frequency of deposits etc.
- Staking behaviours – such as chasing losses, erratic betting patterns
- Product choice – high risk (eg high volatility/low RTP games, or betting on outcomes that the customer is unlikely to have made an informed choice about such as niche overseas sports markets)
- Account and transactional – multiple funding sources, declined payments, cancelled withdrawals, using credit cards or other higher risk payment sources and wallets
- Use of gambling management tools – such as changing deposit limits, the remote time-out facility, records of previous self exclusions or customer interactions
- Customer contact – signs of distress, agitation or complaints
- Physical/visual signs – changes to or deteriorating physical appearance

Gambling with credit

In our Online Review published in March 2018 we supported the principle that consumers should not gamble with money they do not have. We stated that we would “conduct further work on gambling using credit to develop a more comprehensive understanding of the associated risks before setting out some options for consultation”. We committed to exploring options to restrict or prohibit the use of credit cards for gambling but said we would also explore the consequences of doing so.

We will shortly be calling for evidence around gambling with credit. The call for evidence will gather data on the prevalence of, and risks of harm associated with, gambling with credit cards, but will also seek to better understand the risks of any unintended consequences that might arise from a prohibition (such as consumers having recourse to more expensive forms of credit for gambling, eg payday loans). For more information, please see the **consultation hub** <<https://www.gamblingcommission.gov.uk/news-action-and-statistics/Consultations/consultations.aspx>> on the Gambling Commission website.

Life events or changes to an individual customer’s circumstances may mean that a person becomes more or less vulnerable to gambling harms. Those circumstances could include bereavement, loss of income or a sudden windfall, health issues or other events which could mean an increased risk of harm. It will not always be obvious or clear to an operator when such events

have occurred but knowing your customers can help to determine whether those individual circumstances present an increased risk.

“Knowing your customer” can also include information such as the demographic profile of the locality in which they are resident, as such information could indicate levels of affordability i.e. information about a customer’s potential income level or occupation. This can also include observed knowledge about a customer’s ‘regular’ gambling patterns or behaviours.

In our **Consultation on age and identify verification**

<<https://www.gamblingcommission.gov.uk/news-action-and-statistics/news/2019/New-rules-to-make-online-gambling-in-Britain-fairer-and-safer.aspx>> we sought views around affordability, for example on the type of information that operators could access to help inform them as to how much a new customer might be able to afford to gamble. We asked for examples of good practice in relation to both existing practice and what is possible. We have recently published our **response document** *<<https://www.gamblingcommission.gov.uk/PDF/AV-CI-Consultation-responses-Feb-2019.pdf>>* which sets out suggestions around the ways in which to identify affordability.

Effective monitoring processes enable operators to spot when a customer’s gambling activity may indicate an increased risk of harm. How operators monitor a customer’s gambling varies significantly depending on the type of product, place and provider. We think that effective monitoring processes are essential to enable operators to meet the outcome of reducing the risk of harm, and some examples of different ways to monitor activity are set out in the customer interaction guidance.

The guidance builds on the above to provide further information and suggestions around identifying customers who may be experiencing harms associated with gambling

To what extent do you agree with the proposed wording of the code, for operators to meet the outcome to identify customers who may be at risk of or experiencing harms associated with gambling?

Please select only one item

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Don't know

Do you have any other comments?

Interact

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 1. identifying customers who may be at risk of or experiencing harms associated with gambling.
 2. **interacting with customers who may be at risk of or experiencing harms associated with gambling.**
 3. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

It is not enough to be able to identify customers who may be experiencing harms associated with gambling. Gambling operators are required to interact with the customer in order to find out whether they may need help or support in managing their gambling, or to stop or restrict their gambling.

Each operator will need to implement systems and processes appropriate to their business in order to meet the outcomes required by the proposed SR code provision, taking account of the following principles:

- Customers receive the same levels of protection regardless of when or where they gamble. They are not placed at greater risk because they gamble overnight or at weekends, or because a venue is busy.
- Operators interact promptly and early to reduce the risk of greater harm occurring.
- Operators are prepared to refuse business or prevent the customer from gambling, in order to minimise the risk of further harm.

In some situations, the interaction may need to take place at a later time, for example if the customer was displaying signs of agitation, distress or aggression which may inhibit a customer interaction. These incidents must be noted, and the interaction take place at a time when the

customer may be more receptive to the interaction, and when the circumstances and situation are more conducive to interacting.

A customer interaction itself has three parts:

- Observation – which triggers the interaction
- Action – to make contact with the customer
- Outcome – what happened as a result

Observation

This is the behaviour or activity which prompts an interaction. There are few hard and fast rules about how harm can manifest itself in a customer's behaviour, but this can be a combination of:

- displaying any or a combination of the indicators of harm
- a spike or change in gambling behaviour or patterns
- other information held, known or that could be inferred about the customer
- records of previous interactions.

Action

This is the act of interacting. How an operator interacts will depend on the circumstances, the product and environment. There is no one single method of interacting that will always be the best option. Considerations include:

- the method appropriate to the situation – this could be an automated or personalised email, pop up message, phone call, chat-room contact or face-to-face
- the 'strength' of interaction appropriate to the severity of the harmful behaviour – which could be anything between a brief intervention or break in play, through to the licensee taking direct action
- the type of information that the customer needs – this could include telling them what prompted the interaction, and options for providing help or support, such as:
 - advice or suggestions to help the customer manage their gambling, or to take a break from their gambling
 - recommendation of tools or signposting to support
 - taking direct action, such as when there are ongoing concerns but the customer does not take action themselves. This could include ceasing advertising, imposing limits, suspending accounts until the customer engages, increasing visibility or promoting gambling management tools.

Outcome

There will not always be a clear outcome to each interaction, and sometimes the first interaction will be all that is needed to draw the customer's attention to what could develop into harmful gambling. In some cases, further monitoring of the customer's gambling may be needed to spot any change and identify early any further behaviours which could indicate an increased risk. This monitoring process can be manual or automated.

The customer interaction guidance builds on the above to provide further information and suggestions around interacting with customers who may be at risk of or experiencing harms associated with gambling.

To what extent do you agree with the proposed wording of the code, for operators to meet the outcome to interact with customers who may be at risk of or experiencing harms associated with gambling?

Please select only one item

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Don't know

Do you have any other comments?

Evaluate

Social responsibility code provision 3.4.1

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 3. **understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's approach.**
2. Licensees must take into account the Commission's guidance on customer interaction.

In more recent discussions about customer interaction, we have referred to the importance of evaluation, by which we mean understanding the *impact* of the interaction on the customer and the *effectiveness* of the licensee's approach to interaction.

Evaluation means finding out whether something works, which in turn will help improve methods for identifying and interacting with customers.

Understanding the impact of individual interactions

Understanding the impact of the interaction on the customer includes being able to look at and compare:

- the behaviour before the interaction
- the change in behaviour or prompt for the interaction
- how the operator interacted and what was said or done, and
- what happened next.

By ‘impact of the interaction on the customer’, we are referring to a change in the customer’s gambling activity or behaviours which could be attributed to the interaction. Not every customer who receives an interaction will require active follow up, but some will. How the licensee makes that distinction should be proportionate to the severity of the harm being displayed, in order to minimise the risk of further harm.

Keeping records is an essential part of evaluation. Good record-keeping which captures the above, including where an interaction was prompted but did not take place, will help the licensee to consider whether the interactions have had a positive impact on the individual customer’s behaviour, to track over time whether the customer has responded to the interactions, and help to guide decisions about future interactions with that customer. Good record keeping allows operators to demonstrate when and why they have interacted with customers.

Evaluating the effectiveness of the approach

Records of interactions can also provide useful evidence of what types of indicators, methods of interacting and options for support work well for customers. They help the licensee to inform an evaluation of the effectiveness of its overall approach to customer interaction. Good evaluation enables operators to understand which aspects of their approach are the most effective at identifying the right customers, the forms or methods of communication that appear to resonate best with customers, and the types of tools or support that work well to help customers manage their gambling in a way that works for them.

As part of evaluating the effectiveness of their approach, operators should also understand what the prevalence of at-risk gambling is among their customer base. A starting point is the combined health surveys of England, Scotland and Wales. It should be noted however that rates will vary significantly between geographical areas and localities, for example with problem gambling rates in urban areas being higher than rural areas (**see the Problem gambling in Leeds report as an example**) <<https://www.leeds.gov.uk/docs/Problem%20Gambling%20Report.pdf>> , and that when looking at the potential percentage of at-risk or problem gamblers within the customer base, operators should consider the percentage of gamblers, and not the percentage of the adult population.

Gambling operators submit data on the numbers of customer interactions and the numbers of customers who received an interaction, as part of regulatory returns. This is currently the only quantitative measure of whether operators are identifying and interacting with customers who may be experiencing harms associated with gambling. An analysis of this data suggests that some operators misunderstand or misinterpret the purpose of these fields, so the data is not completely reliable. Recently, the Commission has clarified the definitions in regulatory returns and issued

guidance on customer interaction for remote gambling operators, which should go some way to addressing some of the data quality issues.

The Commission will continue to use regulatory returns to measure the levels of customer interactions taking place across all operators, but setting data quality aside, the numbers of interactions alone cannot tell us whether those interactions are with the right people or are having a positive impact on the individual customer's gambling. This is why we need better evaluation.

The customer interaction guidance builds on the above to provide further information and suggestions around evaluating the impact of interactions and the overall approach to customer interaction.

To what extent do you agree with the proposed wording of the code, for operators to meet the outcome to understand the impact of the interaction on the customer, and the effectiveness of the Licensee's approach?

Please select only one item

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Don't know

What other tools or data would be beneficial to licensees to help them understand and evaluate the effectiveness of their approach?

And how could that be provided?

What other types of data could be used to help understand the impact on consumers at an industry level?

Do you have any other comments?

Guidance

Social responsibility code provision 3.4.1

Customer interaction

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 1. identifying customers who may be at risk of or experiencing harms associated with gambling.
 2. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 3. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's approach.
2. **Licensees must take into account the Commission's guidance on customer interaction.**

We propose to introduce a requirement to LCCP that licensees must take into account the Commission's guidance on customer interaction. This guidance is structured along the three key outcomes operators will be expected to meet: to identify – interact – evaluate. Key principles from the guidance have been set out in the previous three sections of this consultation document.

The purpose of guidance is to share knowledge based on research, current practice and lessons learned in order to support operators in determining how they can meet the outcomes. Not all of the content of the guidance will be relevant to all operators, but we expect licensees to **take it into account and be able to demonstrate how they have done so**.

Our understanding of gambling harms and how they manifest is constantly evolving, so we will update the guidance periodically as new information becomes available. However, the guidance is not the only source of information which operators should use to help them develop their own processes, so operators should also keep up to date with published research and other sources.

Similarly, following the guidance alone will not guarantee that harm will not occur.

How the Commission will use guidance

For compliance and enforcement purposes, we will expect operators to demonstrate how their policies, procedures and practices meet the required outcomes. This can be through implementing relevant parts of the guidance or demonstrating how and why implementing alternative solutions equally meet the outcomes.

For the purposes of raising standards, protecting consumer interests, and preventing harm to consumers, we will update and re-issue guidance where new evidence or risks emerge which may have a meaningful impact on how the outcomes can be met.

Remote and non-remote sectors

Following feedback from stakeholders, we have produced separate guidance for remote and non-remote gambling. This is because while the *principles* behind effective customer interaction are the same, the way in which gambling harms manifest themselves, how those behaviours are observed, and the methods for interaction and evaluation can be different.

Remote (updated guidance) <user_uploads/remote-guidance-4.pdf>

The Gambling Commission published guidance on customer interaction for remote gambling operators in February 2018. This guidance is still current. We propose to update the current guidance with the revised version available from the link above, to come into effect at the same time as the proposed LCCP code.

Non-remote (new guidance) <user_uploads/non-remote-guidance-.pdf>

We propose to publish equivalent guidance for customer interaction for non-remote gambling operators. This follows a consistent format and structure to the previously published remote guidance that some operators will already be familiar with.

To what extent do you agree with the approach to use guidance to provide good practice and support to operators to help deliver effective customer interactions?

Please select only one item

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Don't know

Do you think guidance will assist operators in developing practices to deliver effective customer interactions?

Please select only one item

Yes No

What else would you wish to see included in guidance?

What other tools - regulatory or less formal – do you or would you find useful to assist you in delivering effective customer interaction? This could include research and insight, copies of evaluations, sharing good practice, workshops etc.

Do you have any other comments?

Ordinary code provision 3.4.2

We propose to remove all three parts of Ordinary Code Provision 3.4.2. The rationale for this is set out below, and we are seeking your views on whether we should proceed.

We propose to remove OCP 3.4.2 1 - *Operators should work together to share experience and deliver good practice across the full range of social responsibility requirements for customer interaction.*

Recently, we have seen progress being made by the industry to work collaboratively to share their own practices, facilitated by the Commission or the industry itself. In the last 12 months in particular, more and more gambling businesses have worked together on a shared understanding of what gambling harms looks like, how these can manifest in their customers' behaviours, and ways to interact effectively with those customers to reduce the risk of harm.

In particular, this collaboration has become apparent through Remote Gambling Association workshops on behavioural analytics, collaborative working at our Raising Standards conferences, and our recent co-creation workshop with operators looking at the use of customer data to identify harmful play.

The new national strategy to reduce gambling harms will include specific priorities for collaboration by gambling businesses on trialling and evaluating approaches for player protection. The strategy will be launched in April 2019.

We propose to remove 3.4.2 2 - *Operators should keep a record of customer interactions, and where an interaction has been ruled out, the reasons for this. Where an interaction has taken place at a later date, this should also be recorded.*

However, this does not mean that the need to record interactions is no longer necessary. We propose to include the necessity of accurate record-keeping, including where an interaction has not taken place, as part of the guidance. This is because there will be occasions when a customer displays behaviours which would ordinarily prompt a customer interaction, but it is not possible for staff to carry it out. In these situations, it is important that the behaviour is recorded, to inform staff and enable them to either carry out an interaction when possible, or to help establish a pattern of behaviour to help decide whether an interaction should take place.

We propose to remove 3.4.2 3 - *In providing training to staff on their responsibilities for customer interaction, licensees should have, as a minimum, policies for induction training and refresher training.*

We think that effective policies and procedures for staff training, including induction training and refresher training, are an essential factor in being able to meet the outcomes and should be inherent in each operator's approach. Therefore, we think that including this requirement as an ordinary code provision is unnecessary.

Do you agree with the proposal to remove ordinary code provision 3.4.2?

Please select all that apply

Yes No

Do you have any other comments?

Estimation of costs for licensees

Please note that this question is for licensees only.

For licensees: If possible provide an estimate of the costs that might be incurred by your business through implementing the proposed changes to SR Code 3.4.1. Such costs might include, for example, technological changes (including software development and associated staff time), familiarisation costs in terms of staff training, or other business impact costs. Please also provide details of one-off costs and any annual or ongoing costs from the proposals.

Completed

Many thanks for completing the questions for the consultation on customer interaction. Please select which of the others to complete next, or click finished.

Please select an option of where to go next

Please select only one item

- Consultation on ADR Call for evidence: Blocking software
- I have completed all three and have now finished

Introduction

All gambling businesses licensed by us must appoint an alternate dispute resolution (ADR) provider if customers gamble directly with them. If a customer has a complaint about the outcome of their gambling, they must complain first to the gambling business and go through its complaints process. If the customer is unhappy with the business's decision, they can then ask the ADR provider to look at their complaint again.

The provider must be named in the business's complaints procedure and customers can only use one that the gambling business has agreed to. The provider is independent of the business and must be approved by us. The gambling business must choose its provider from the **approved list** [<https://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/General-compliance/ADR/Approved-ADR-providers.aspx>](https://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/General-compliance/ADR/Approved-ADR-providers.aspx) .

Review of complaints processes in the gambling industry

Over the last two years, we have been looking closely at how complaints processes in the gambling industry are working for consumers. We published our **review**

<https://www.gamblingcommission.gov.uk/PDF/Complaints-processes-in-the-gambling-industry.pdf> in March 2017. We found that improvements were needed to make these processes more accessible and effective for consumers across all aspects of complaints handling. Part of that review focused on the provision of ADR.

When we published that review, there were 11 approved ADR providers for the British gambling industry. We had expected that number to give consumers more choice of provider, and that competition between them would help to drive quality and accessibility. Our evidence indicated that had not happened and standards across providers might not be consistent.

When they were approved, providers had to show they met the standards set out in the **ADR regulations** <http://www.legislation.gov.uk/ukxi/2015/542/contents/made> . These standards are not specific to gambling and, because of this, they don't provide detailed requirements on customer service and decision making, for example. Our information suggested that consumers were not always getting good customer service from providers, and that decision making standards varied.

We also considered that ADR providers were able to inform the gambling industry and us about emerging problems they had spotted in complaints they had seen. Not all providers were doing this.

We decided to set out a framework of requirements for providers in the gambling sector. The framework would include standards around customer service, decision making and supporting the gambling industry. It would also cover governance arrangements. Our aim was to make the role of an ADR provider clearer, improve consistency, and help to reassure consumers that a provider is independent of the gambling business. We would then review all approved providers against our new framework.

Standards and guidance for ADR providers

In October 2018 we published our **standards and guidance**

<https://www.gamblingcommission.gov.uk/PDF/ADR-in-the-gambling-industry-guidance.pdf> for ADR providers. The standards supplement, rather than replace, the requirements of the ADR regulations. They include areas such as:

- Defining the types of complaint a provider can look at
- Compensation
- Information to consumers on aspects such as funding, processes and timescales and how to make complaints about the provider
- Consumers' rights around evidence and being kept updated on the progress of their case
- Principles of good governance set out by the Ombudsman Association
- Requirements around potential conflicts of interest

During November and December 2018, we reviewed providers against the new standards and the requirements of the ADR regulations. We are now considering any further action we need to take. The action taken will differ, depending on whether we have found a failing against the ADR regulations, our new standards, or both.

The ADR regulations require us to publish a list of providers that we have approved under the terms of those regulations. Following our review, if an ADR provider does not meet the ADR regulations, and does not remedy that failure within three months, we may remove it from our list of approved providers.

We plan to publish a list of those providers that also meet our additional standards. If a provider does not meet them, we will not add them to this 'extra' list.

Our proposed change

We want to consult on whether we should require gambling businesses to name only ADR providers who meet our additional standards, as well as the requirements of the ADR regulations. This would give an incentive to ADR providers to meet our additional standards, because those that did not could not be used by gambling businesses. It would also make sure that consumers receive a consistent service from any ADR provider in the gambling sector.

The requirements on gambling businesses to make sure that their customers can access ADR are contained within our **Licence Conditions and Codes of Practice**

<https://www.gamblingcommission.gov.uk/PDF/LCCP/Licence-conditions-and-codes-of-practice.pdf#page=71> (LCCP).

We propose to make this change by changing the definition of 'ADR entity' that currently appears in code provision 6.1.1 of the LCCP. The proposed new definition is shown below:

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

In this Code, 'ADR entity' means

a) a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015, and

b) whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

The existing paragraphs of this section of the LCCP will be unchanged.

Do you agree that we should require gambling businesses to only use ADR providers that have met our additional standards?

(Required)

Please select only one item

Yes No

Please give reasons for your answer

More information

Our document '**Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers**' <<https://www.gamblingcommission.gov.uk/PDF/ADR-in-the-gambling-industry-guidance.pdf>> contains our additional standards, requirements of the ADR regulations, and general guidance and information on how we expect these to be applied. We have extracted the additional standards and included them here. For ease of reference, the standards are listed in the approximate order they appear in our guidance document and should be read alongside it.

ADR Standards

1. Decisions an ADR provider can consider (see Standards and Guidance 3.7)

1.1 The ADR provider must consider a transactional and/or contractual dispute. The dispute must be considered independently and impartially of any investigation by the Gambling Commission.

1.2 The ADR provider must consider whether there are any statutory obligations and or requirements that impact on its ability to deal with the dispute.

2. Compensation (see Standards and Guidance 3.13 – 3.15)

2.1 In any claim to award compensation (rather than reimbursement), the ADR provider must consider the emotional and practical impact on the consumer.

2.2 The amount of any compensation awarded is at the discretion of the ADR provider and is not subject to appeal by either party within the ADR process.

3. Information to consumers (general) – reconsidering an outcome (see Standards and Guidance 3.21)

3.1 An ADR provider must make available to consumers information on:

- a) whether it will reconsider the outcome of a dispute after the outcome has been issued
- b) the circumstances and/or grounds for reconsideration to take place
- c) the time-limits for requesting a reconsideration, and the process that it will follow
- d) what happens at the end of the process

4. Information to consumers (general) – funding, scheme purpose, processes and timescales, annual audit (see Standards and Guidance 4.4)

4.1 The following information must be published and made readily available to consumers and businesses:

- a) the purpose of the ADR scheme
- b) how the ADR scheme is funded and is independent
- c) the ADR provider's methods, manner and timescales for handling disputes.

4.2 A review must be conducted annually of the ADR provider's service standards, service quality and governance arrangements.

4.3 An annual audit must be conducted by the ADR provider of all its dispute outcomes.

5. Information to consumers (general) – performance data (see Standards and Guidance 4.8. 4.9. 5.16)

5.1 The ADR provider must publish performance data demonstrating how its procedures are transparent and independent. This information must be published quarterly to supplement the information in its annual report.

5.2 The ADR provider must publish information on its website(s) about its performance against the customer service requirements outlined in the Gambling Commission's document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

6. Information to consumers (general) – complaints about the ADR provider (see Standards and Guidance 5.13)

6.1 The ADR provider must put in place and publish on its website(s) an effective procedure for handling complaints received about its service. The information must include:

- a) how a complaint can be made
- b) the types of complaints that can be raised
- c) an explanation of the process for reviewing the complaint
- d) how long the process is expected to take
- e) the communication the complainant can expect to receive from the ADR provider

7. Information to consumers (specific) – timescales and updates (See Standards and Guidance 5.9, 5.17)

7.1 The ADR provider must acknowledge receipt of the consumer's initial contact within 3 working days.

7.2 Once they have received all the documents that make up the complete dispute file, the ADR provider must give an update to the consumer at least every 30 calendar days that the dispute is ongoing.

7.3 Any 'pause' triggered by the ADR within the dispute process must be explained to the consumer and gambling business.

7.4 The ADR provider must publish its grounds for closing a dispute. This information must also be clearly communicated to the consumer and business at the time the decision is made.

8. Information to consumers (specific) – evidence (see Standards and Guidance 2.20, 4.6, 4.7, 5.10)

8.1 All parties to a dispute must be notified as early as possible in the dispute process of their right to request to see the evidence advanced by the other party. This information must be provided to them in a timely manner. The only exception to this requirement is where sharing evidence or information may result in a conflict with other law or regulations.

9. Vulnerable consumers (see Standards and Guidance 5.14)

9.1 An ADR provider must consider if the language that the consumer has used in raising their dispute, or in any of their communication, indicates that they might be vulnerable and/or in need of additional support to understand the ADR process.

9.2 When dealing with a vulnerable consumer the ADR provider must consider:

- a) that the communication is tailored to meet the individual needs of the consumer as far as is possible
- b) whether the consumer needs additional support or an alternative means of contact
- c) whether there are indications that the consumer's gambling behaviour puts them at risk of being harmed by their gambling, or presents a risk that others (such as family members) may be harmed.

10. Compliance with natural justice and the Ombudsman Association's six principles of good governance (see Standards and Guidance 4.3, 4.5)

10.1 The ADR provider in the gambling sector must meet the Ombudsman Association's six principles of good governance irrespective of whether it is a member of the Ombudsman Association.

10.2 The ADR provider's policies and procedures for decision making must take account of the balance of power within a dispute and must take account of the consumer's needs when requesting or sharing information.

11. Compliance with natural justice and the Ombudsman Association's six principles of good governance – decision quality standards (see Standards and Guidance 4.16, 4.17, 4.18)

11.1 Before reaching an outcome in a dispute, the ADR provider must:

- a) thoroughly examine all the evidence presented to it
- b) identify the key issues, establish the relevant facts, and identify all necessary enquiries
- c) ask intelligent and informed questions, in an appropriate manner, to enable all the relevant facts to the dispute to be identified
- d) provide information to the parties to the dispute in such a way that clarifies the key issues, the facts that are known, and any information still outstanding.

11.2 In reaching an outcome, the ADR provider must:

- a) take full account of the relevant information provided in the dispute
- b) interpret and apply the law correctly, including consumer protection laws
- c) ensure the rules of natural justice are met, in that the parties know the case they must answer, have had fair opportunity to make their own case, and that there has been no bias
- d) reach an outcome that is reasonable in all the circumstances of the case (taking account of whether the outcome is reached through mediation or adjudication)
- e) tailor each communication and outcome notification to the case, ensuring that the consumer's perceived level of understanding is respected.

12. Conflicts of interests (see Standards and Guidance 4.10 – 4.15)

12.1 The ADR provider must ensure that its official(s) are not conflicted by their non-ADR duties.

12.2 Any conflict(s) must be reported to the Commission and, as a minimum, handled in accordance with the procedure in the ADR Regulations.

12.3 The ADR provider must ensure that parties to a dispute are informed that if the dispute is transferred to another ADR provider, due to a conflict of interest, the terms and conditions of the new ADR provider will apply to both parties for that dispute.

13. Providing information to stakeholders and to us (See Standards and Guidance 6.1, 6.5, 6.6)

13.1 The ADR provider must share relevant information with interested stakeholders, where it is appropriate to do so. The only exception to this requirement is where sharing evidence or information may result in a conflict with other law or regulations. This must include:

- a) information on emerging trends or themes
- b) data and reports
- c) input to relevant consultations or calls for evidence
- d) providing feedback to gambling businesses
- e) providing information on potential regulatory breaches

13.2 The ADR provider must submit quarterly activity returns, based on the annual report, containing the following:

- a) number of domestic disputes in Great Britain that were received
- b) types of disputes to which the complaints relate. We will agree a common typology with ADR providers to ensure consistency of reporting.
- c) number and percentage disputes upheld in favour of the gambling business – overall and for each type of complaint
- d) number and percent disputes upheld in favour of the gambling business – overall and for each type of complaint
- e) number and percent disputes settled by the gambling business without an outcome being imposed – overall and for each type of complaint
- f) average length of time taken to receive the complete case information from the gambling business

g) average length of time taken to complete the case having received the complete complaint file.

13.3 The ADR provider must submit the information in the manner and to the timetable the Commission specifies. ADR providers may submit a nil return if they have not undertaken any gambling dispute activity in the quarter.

Completed

Many thanks for completing the questions for the consultation on alternative dispute resolution. Please select which of the others to complete next, or click finished if you have completed them all.

Please select an option of where to go next

Please select only one item

- Consultation on Customer Interaction Call for evidence: Blocking software
- I have completed all three and have now finished

Introduction

Blocking software can be a helpful tool to add friction between a compulsion to gamble and the ability to do so. Currently operators should signpost customers to the availability of blocking software that helps prevent access to gambling websites (ordinary code provision 3.5.4 paragraph 4).

Evaluation <<https://about.gambleaware.org/media/1813/blocking-software-evaluation-findings-report.pdf>> undertaken for GambleAware about the effectiveness of such software indicates that it can be beneficial to those that want to restrict their access to online gambling. One potential barrier to the take up of these services is that, when there is a charge, they currently need to be funded by the individual.

Additionally, payment is often per device (per year) so if someone pays for one device, they don't necessarily pay for all the devices they own, meaning they have easy access to continue gambling. GambleAware decided last year to fund free access to blocking software for those customers that were participating in treatment services funded by them.

We would like to obtain views on:

- i) whether we should extend the existing expectation (that operators should signpost blocking software to consumers) so that operators have to provide access to blocking software free of charge to customers, and
- ii) how this could most effectively be delivered.

One of a number of tools

We require operators to:

- provide information to customers to help them make informed choices
- offer a number of tools to allow customers to manage their gambling such as the ability to set time and money limits
- identify those that maybe experiencing gambling related harm and to intervene to reduce that harm.

The aim of these requirements is to limit the amount of gambling related harm. Interventions should happen at the earliest opportunity to reduce gambling related harm. There is also a need to offer facilities to support those that have decided to stop gambling.

Based on the results of systematic testing, blocking software appears to be generally effective in restricting access to online gambling, including illegal websites. Gambling-specific software blocking packages were found to be more effective in only blocking access to undesirable content, rather than blocking information that could be helpful such as gambling support services. Gambling-specific software packages also sometimes include advertising blocking features.

Current limitations of blocking software include: the ability for someone to access gambling by using a different device; that it doesn't provide 100% coverage; and the fact that an individual using the software does not need to inform a gambling operator that they wish to be blocked, therefore there isn't a third party also trying to prevent them from gambling.

If a consumer wants to be prevented from gambling it is therefore better for them to use blocking software in combination with self-exclusion, which places a responsibility on operators to take all reasonable steps to prevent someone from gambling, and payment card blocking for gambling transactions, which a number of financial institutions are beginning to offer.

Gamstop will, when it becomes a licence condition, allow an individual to self-exclude from all online operators with a single request. But it should be recognised that none of these tools will be infallible and if someone is determined to gamble they will find a way to do so. It is therefore very important that, in addition to using tools such as this, people receive treatment or support to build long-term strategies to avoid, or manage their, gambling.

How it should be offered

We would welcome views on whether:

- a) it is proportionate to require gambling operators to make gambling blocking software available free of charge to consumers;
- b) if implemented, operators should offer a direct route for their customers to access the service;
- c) operators should fund free blocking software for Gamstop users who request it;
- d) the offer to the customer should be for blocking software on a single device or multiple devices, and if multiple, how many;
- e) there might be any unintended consequences of requiring operators to fund blocking software.

An advantage of gambling operators funding free blocking software for Gamstop users is that customers who use Gamstop are requesting to be prevented from gambling with all relevant licensed online operators, and the blocking software is aiming to achieve the same result. Together, they should complement each other and add to the likelihood of the consumer being prevented from gambling online.

The advantage of operators offering it directly is that it becomes another tool in a suite of options that consumers can choose to use in a way that best helps them to manage, or stop, their gambling. Requiring a customer to self-exclude in order to access free of charge blocking software may be a barrier to take-up of the service.

One of the reasons we continue to require operators to offer their own self-exclusion schemes is to provide self-exclusion options for those who may consider participation in a national scheme to be too extensive for them. So, while take-up of blocking software shouldn't be a pre-condition to participation in an individual operator's self-exclusion scheme, if a consumer requested blocking software from an operator there would be an expectation that the operator (but only that operator) prevents that customer from gambling for the duration of the gambling block.

Duration

Currently most funding models are based on a per device, per year basis. Given the likely increase in demand for the service if it were to be offered free of charge to customers, we would expect that this model could change. We would welcome views on the duration the software should be offered for e.g. whether it should mirror self-exclusion durations i.e. at least 5 years.

Possible unintended consequences

We would welcome views on whether there could be any unintended consequences of requiring operators to fund blocking software. For example, it was noted in the evaluation that 'some stakeholders said that charging can be helpful in achieving outcomes by making the user value the investment in the software.'

Questions

Should gambling operators make gambling blocking software available free of charge to consumers?

(Required)

Please select only one item

Yes No

If yes, how should operators most effectively offer this service?

Should operators fund free blocking software for Gamstop users?

(Required)

Please select only one item

Yes No

Please give reasons for your answer

Should blocking software be made available free of charge by gambling operators on a single device or multiple devices?

(Required)

Please select only one item

Single device Multiple devices

Please give reasons for your answer

How long should operators fund access to blocking software free of charge to each customer?

Please give reasons for your answer

Are there any unintended consequences of requiring operators to fund blocking software?

(Required)

Please select only one item

Yes No

Please give reasons for your answer

Completed

Many thanks for completing the questions for the call for evidence on blocking software. Please select which of the others to complete next, or click finished if you have completed them all.

Please select an option of where to go next

Please select only one item

- Consultation on Customer Interaction Consultation on ADR bodies
 I have completed all three and have now finished

Finished

Many thanks for your submission(s) to our consultations and call for evidence. We will list the responses in due course.

This is the final page before submission. If you still want to go back and submit a response to one of the three surveys, then please select one of the options here.

Please select only one item

- Consultation on Customer Interaction Consultation on ADR bodies
 Call for evidence: Blocking software Submission page