

KnowNow – Player Protection Forum: 26 January 2021



Review of the current player protection landscape

Presented by David Clifton

1. Introduction

I had the great pleasure to present the opening session of the last [KnowNow Player Protection Forum in May 2019](#) with a review of what was the player protection landscape at that time.

There was a great deal to comment on. My goodness, what a lot there is to cover in the period since then. Part of the reason for that is of course down to the intervention of the Covid-19 pandemic which was directly responsible for the adjournment of last year's Player Protection Forum in the hope that by now, we would all be able to assemble together as we have done on so many previous occasions for KnowNow's excellent series of gambling-related conferences.

Alas that was not to be, but I am delighted to start off today's conference with a round-up of key developments in the field of player protection over the last year or so and a quick gaze into my crystal ball to predict what can be expected in both the near and rather more distant future, most notably arising from ongoing tightening up of regulatory requirements by the Gambling Commission that, in the process, will further diminish the list of topics for debate in Parliament as MPs and noble Lords ponder what changes are required to the Gambling Act 2005.

2. General Election 2019

On that front, back in November 2019 we saw for the first time ever within all four major political parties' General Election [manifestos proposals for change to gambling regulation](#). I will take them each in turn.

(a) Conservative Party

The Conservative Party's stated list of issues for particular focus at that time was very short:

- Credit card misuse and
- Loot boxes

As everyone will know, one of those is already ticked off by the [ban on credit cards for online gambling and for non-remote betting](#) that came into force on 14 April last year, surprising many who had not realised that such a ban already existed for land-based casinos and bingo clubs. Despite the fears for their businesses expressed by a good number of operators before the credit card ban was imposed, life (of their businesses) has carried on.

The other issue – that of loot boxes – looks destined to come under some sort of statutory control. Whether it's under a new online harms law or reformed gambling legislation (as recommended by a [DCMS Select Committee report](#) on Immersive and Addictive Technologies in September 2019 and by the [Childrens' Commissioner](#) three months later) remains to be seen, but it's certain that a large mass of evidence will have been collected following the Government's [call for evidence](#) on this subject that ran between September and November last year. We will all learn more about that in the coming months.

(b) Labour Party

At the time the Labour Party's manifesto was published, it was under a very different style of leadership. Since then it has lost both Jeremy Corbyn as Leader and Tom Watson as Deputy Leader, the latter having been particularly [vocal on the need for gambling reform](#) and, somewhat controversially, subsequently [joining Flutter Entertainment](#) as a consultant. This was after he had made a very balanced [speech at ICE](#), in February last year, in which he explained that he did not view *"gambling in terms of angels and demons, in terms of black and white"*, adding *"I'm no prohibitionist, hell-bent on saving souls and closing down the bookies. What I want is a system of regulation which protects the vulnerable, sets sensible boundaries, allows reasonable rewards for the industry, encourages innovation, and lets you get on with your business."*

Difficult to argue with that. It was by no means the 'firebrand' style of speech that many in the industry had feared but those worried about the absence of a replacement firebrand carrier within the Labour Party following Tom Watson's departure need not have feared. His role has been more than ably replaced by [Carolyn Harris MP](#), leader of the Gambling-Related Harm All-Party Parliamentary Gambling Group who has very impressively gathered strong support from all political parties including former Tory leader Iain Duncan-Smith.

Anyway, the Labour Party's General Election manifesto announced that it would:

- *"curb gambling advertising in sports*
- *introduce a new Gambling Act fit for the digital age [and]*
- *establish gambling limits, a levy for problem gambling funding and mechanisms for consumer compensations"*.

(c) Liberal Democrats

The LibDems made clear that they would *"introduce further measures to protect individuals, their families and communities from problem gambling"*. In addition to a ban on credit cards for gambling, their proposed measures were:

- a compulsory levy on gambling companies to fund research, education and treatment of problem gambling,
- restrictions on gambling advertising and
- establishment of a Gambling Ombudsman.

(d) Scottish Nationalist Party

The SNP took a slightly different line, claiming credit for leading the successful campaign against FOBTs, and:

- demanding that not only should problem gambling be treated as a public health matter and tackled “*with a joined-up strategy*”, but also that there should be a full public health inquiry into gambling related harm and
- perhaps unsurprisingly, calling for greater devolution of gambling regulation to the Scottish Parliament.

(e) Prelude to the Government Review of the Gambling Act 2005

So, more than a year before the [Government Review of the Gambling Act 2005 was launched](#) on 8 December 2020, we were given a pretty clear idea of what would constitute the main areas of player protection focus for MPs of all political colours. Indeed by January of last year, the DCMS Minister then responsible for gambling policy was telling the House of Commons that “*nothing is off the table*” insofar as matters to be considered as part of the Review process are concerned.

That was certainly reflected in the very wide range of recommendations that emanated most notably from:

- the [Gambling-Related Harm APPG](#) in June last year and
- the [House of Lords Select Committee](#) on the Social and Economic Impact of the Gambling Industry the following month, their flag now being carried forward by ‘[Peers for Gambling Reform](#)’,

with constant support from certain sections of the national media, most notably the Guardian and the Daily Mail.

I will get out my crystal ball a bit later to help me predict what I think will actually happen after the current [Call for Evidence](#) ends on 31 March and the Government sets out its conclusions and proposals for reform in a White Paper in a few months’ time in readiness for what seems sure to be very heated debate process both in Parliament and in the media.

3. Changes to the player protection landscape over the past year

In the meantime, let’s look at what changes to the player protection landscape (beyond the credit card ban that I have already mentioned) have actually happened within the last year or so.

(a) The Pandemic

The big trigger for change has obviously been the pandemic. The first lockdown in March last year prompted an immediate [call from the Gambling Commission](#) for all online operators to:

- *assess individual affordability on an ongoing basis [because] customers may be experiencing disrupted income*
- *increase social responsibility interactions and intervene where customers are showing signs of gambling related harm*
- *onboard new customers in a socially responsible way and not exploit the current situation for marketing purposes*
- *refresh the information on customers regularly*
- *review the levels that trigger interaction for AML and SR reasons*
- *ensure that gambling products have been tested by a test house before they are released to the market*

A [personal message](#) was sent to all online operators by the Commission's CEO on 25 March adding that:

- customers may be vulnerable and experiencing financial uncertainty, whilst others may be experiencing other effects of being isolated including, for example, feelings of anxiety, loneliness or boredom and
- operators should be very cautious when seeking to cross-sell online gaming products to customers who signed up in order to bet

The Commission made clear it was expecting operators:

- to ensure that their affiliates conduct themselves appropriately
- to act in a way that minimises the risks to the licensing objectives
- to treat consumers fairly and communicate with them in a clear way that allows them to make a properly informed judgment about whether to gamble,
- to work with the Commission in an open and co-operative way and
- to act in accordance with both the letter and spirit of the Commission's regulatory framework.

Just two days later, the Commission issued its own [advice to consumers](#) on "how gambling companies should keep you safe while betting online" and, the following month, the [DCMS requested](#) "regular intelligence from the industry on patterns of gambling during the coronavirus outbreak, including how operators are managing the risk of problem gambling and what more companies can do to promote safer gambling messaging during the current crisis".

Not only that but the Advertising Standards Authority published a "[Gambling Advertising and Lockdown](#)" warning and the Gambling-Related Harm APPG called for [introduction of a daily gambling limit](#) of no more than £50 as "a clear demonstration that the industry is willing to act responsibly and do what they can to protect society and peoples' finances at this dreadful time".

The clear expectation of politicians, the media and many sections of the public alike was that problem gambling rates would soar through the roof as people were confined to their home environments. A [government minister said](#) as much on 21 April:

"Although there is no firm evidence at this stage, there are concerns that the current social distancing measures could lead to an increase in problem gambling online with people in lockdown and internet usage up. This follows reports received by the Gambling Commission of a recent increase in consumer activity around online slots, poker, casino gaming and virtual sports, following the cancellation of most live sport and the closure of all land-based gambling premises".

As matters stand, it's too early to state with any absolute certainty whether fears of greatly increased rates of problem gambling were unfounded. For its part, the [Gambling Commission has confirmed](#) that "there is no evidence to suggest an increase in problem gambling".

As against that, the Gordon Moody Association reported considerable increases in calls to its helpline and a longer waiting list for its residential treatment programme.

The answer may come from an [18 month research project](#) – funded by the Economic and Social Research Council and commenced in June last year – that is considering how risk factors (such as boredom, stress, anxiety, financial problems and loneliness) may have heightened during periods of lockdown. The researchers are also looking at gambling opportunities unaffected by the coronavirus restrictions – such as online slots and casino games, e-sports and virtual events – activities that are usually associated with high rates of problem gambling.

What does seem clear is that the latest [Gambling Commission statistics](#) published last week disclose no evidence of there having been a significant or sustained increase in gambling activity during the Covid-19 pandemic, at least so far.

That said, in his [most recent personal reminder to online operators](#) earlier this month, the Commission's CEO warned as to the possible consequences from people feeling more isolated and vulnerable as a result of the length of the pandemic period and further uncertainty about their personal or financial circumstances.

So where have been the regulator's major causes for concern so far in relation to the effect of the pandemic on gambling consumers? The Commission has consistently pointed out that the 'most engaged gamblers' (meaning those engaged in 3 or more different gambling activities) are the most likely to have started new activities since the Covid-19 outbreak began and to have increased their time spent gambling and their overall gambling spend.

In addition, the first lockdown witnessed a notable increase in the number of online slots sessions lasting longer than an hour (although that subsequently decreased when live sport resumed providing opportunities for betting).

Worth noting is the effect on younger people. In this respect, the [Commission has pointed out](#) that:

- young women (aged under 35) are more likely than average to have *started* gambling since March 2020, where they hadn't gambled before and
- young men (aged under 35) are more likely to have increased their gambling since March 2020 as a result of offers received from gambling companies or because of the desire to socialise.

In assessing what effect the pandemic has had on gambling behaviour, it's appropriate to bear in mind what seems to have been, in general terms, a responsible and constructive response by the online industry to the Gambling Commission's [additional formal customer interaction guidance](#), first published in May last year, still in force now and no doubt remaining in force in the future.

This additional guidance has required:

- reviews by operators of all thresholds and triggers used to track vulnerability to ensure that they reflect the changed financial circumstances that many consumers will be experiencing
- reviews of time indicators to capture play in excess of 1 hour (due to this being a proxy for potential harm)
- the setting of additional (or modifying existing) thresholds and triggers that are specific to new customers, reflecting lack of an operator's knowledge of that individual person's play and spend patterns
- implementation of processes that ensure continual customer base monitoring, identifying customers whose patterns of play, spend or behaviours have changed in the previous few weeks
- conducting affordability assessments for individuals picked up by existing or new thresholds and triggers that indicate consumers experiencing harm
- considering limits or blocks on further play until checks have been concluded and supporting evidence obtained
- preventing reverse withdrawal options for customers (which most certainly now looks set to be a permanent prohibition) and
- stopping bonus offers or promotions to customers displaying indicators of harm (which is surely a 'no-brainer' in any event).

Also very positive has been the observance by BGC members of not only the [cessation of TV and radio gaming advertising](#) during the first lockdown but also the [BGC's Ten Pledge Action Plan](#).

In summary that action plan involved:

1. safer gambling messaging across all sites, apps and channels including inbox messaging to all existing and new customers reminding them of the safer gambling tools available
2. heightened monitoring and data collection in the knowledge that customers are required to abide by social distancing measures
3. active promotion of deposit limits and sending to any player exhibiting abnormal patterns of play a deposit limit message (with a link to the deposit limit tool)
4. ongoing reviews of marketing and advertising – in volume, content and targeting – to ensure it is appropriate and responsible, given the increased risk
5. reporting instances of illegal rogue and inappropriate advertising
6. enforcing a strict 'one-strike-and-you're-out' policy for breaches of the Pledges by affiliates
7. sign-posting in safer gambling messaging to (a) GAMCARE advice and the 24-hour 'free-to-call' National Gambling Helpline and (b) GamStop for self-exclusion
8. a re-stated commitment to maintaining the vital flow of important funding for Research, Education and Treatment of gambling-related harms
9. conducting welfare checks on employees during the Covid-19 crisis and
10. encouraging staff to volunteer for community service, as well as offering premises (where possible) for use by those supporting the effort to tackle the Coronavirus

There are of course many smaller UK licensed operators who are not members of the BGC. Some will not have observed the same commitments as the larger sized operators who comprise the BGC membership.

Some of those smaller operators are likely to be the most at risk from the Gambling Commission's ongoing Compliance Assessment programme. Having assisted a sizeable number of operators in preparation for, or following, such assessments, my main word of advice to them is to thoroughly review your [corporate governance framework and the internal control processes](#) that stand at the heart of that framework. In my view, it's the most crucial starting point to ensure that you stand the best chance of meeting the Commission's compliance expectations.

(b) What else?

So what else has occurred within the last year or so of direct relevance to player protection? Here are twenty material developments (with the single most material development to follow on behind them):

1. Shortly prior to Christmas 2019, a report entitled '[The effects of voluntary deposit-limit setting on long-term online gambling expenditure](#)' concluded that limit-setting appears to be an effective responsible gambling tool. Refining that conclusion, last week GambleAware published an interesting [research report finding by the Behavioural Insights Team](#) that removal of industry-set options for deposit limits can lead to online gamblers reducing the deposit limit amount they set for themselves by up to 46%. It's worth a read.
2. It was [announced last March](#) that, with effect from the start of the next school year in September 2020, education designed to enable children and young people to understand, and avoid, risks associated with gambling would become a compulsory element of the UK Department of Education's personal, social, health and economic (PSHE) curriculum. This initiative was supported two months later with the BGC launching a £10 million [national gambling education and support programme](#).

3. The requirement for all UK-licensed online gambling operators to participate in [GamStop came into force](#) at the end of March (leading to the immediate [operating licence suspension of two operators](#) who had failed to do so)
4. In June, the BGC's five largest members [committed to spending £100 million via GambleAware](#) improving treatment services for problem gamblers – a commitment publicly reaffirmed by GambleAware to the Gambling-Related Harm APPG earlier this month. This is in addition to the £9 million from regulatory settlements that the [Gambling Commission confirmed](#) in April was then en-route to GambleAware in order to “*boost resilience of gambling harm treatment services during Covid-19*”
5. In June the gambling affiliates trade organisation ‘Responsible Affiliates in Gambling’ announced its [support in principle](#) for a licensing or registration scheme for affiliates
6. That same month, the Gambling Commission announced it was “*working with an [interim Experts by Experience Group](#) who will provide advice, evidence and recommendations to the Commission to help inform decision making and raise standards, along with co-creating a permanent Experts by Experience Advisory Group to advise the regulator on a more established basis*”.
7. In September, the [BGC Game Design Code of Conduct](#) introduced safer gambling changes to online game design. Following a Gambling Commission [consultation process on online slots game design](#) that concluded that same month, imposition of changes to the Commission's Remote Technical Standards are now anticipated within the near future
8. At the beginning of October the new [6th edition of the Gambling Industry Code for Socially Responsible Advertising](#) came into force, introducing:
 - a. new requirements relating to social media marketing,
 - b. promoting consumer awareness of ways in which to minimise exposure to gambling advertising across social media platform,
 - c. expanding the scope of the Code to cover search advertising and
 - d. requiring more robust controls with regard to marketing activity conducted by affiliates
9. In mid-October, Gambling Commission CEO Neil McArthur gave [a speech](#) inviting the financial sector to join a multi-sector partnership approach to find innovative ways to reduce gambling-related harm. By all accounts, it went down well, so more positive news on that front is eagerly awaited.
10. Following earlier publication by the BGC of a Gambling Industry Code of Conduct for High Value Customer VIP Reward Programmes, the Gambling Commission strengthened controls on how operators incentivise their high-spending customers with its [High Value Customers Industry Guidance](#) that came into effect at the end of October (together with associated LCCP changes)
11. At the same time, the Commission introduced [other LCCP changes](#) intended to provide greater protections for customers which included publication of amended Complaints and Disputes Guidance for operators

12. On 6 November, the Gambling Commission published its first ever [National Strategic Assessment](#) designed to assess (and prioritise actions to address) the issues and risks that gambling presents to consumers and the public. Both that document and the Commission's annual [Compliance & Enforcement Report](#) (published on the same day) constitute essential reading-matter for all UK-licensed gambling operators
13. In mid-November, [BACTA voluntarily banned](#) under 18-year-olds from playing Category D cash payout machines of the type located in seaside arcades and family entertainment centres
14. A few days later, Neil McArthur expressed keenness on the part of the Commission to [engage more directly in future](#) with those of its licence-holders and their trade bodies that are willing to work in collaboration with the regulator to raise standards further
15. Later that same month, the [ASA reported](#) that the second of its online monitoring sweeps to identify and tackle age-restricted ads appearing in children's media had encouragingly revealed that the number of such ads had reduced significantly, from 70 ads in the first sweep to just 5 ads in the second
16. On 8 December, the [government announced](#) that the minimum age for playing the National Lottery would be raised from 16 to 18 by no later than October this year
17. Just over a week later, GamCare, Gamban and GamStop collectively launched a twelve-week [TalkBanStop pilot programme](#) to offer three free tools to help people stop gambling
18. On 18 December, the Gambling Commission commenced a [consultation](#) (that closes on 12 February) on proposals to adopt a new methodology for its regular participation and prevalence research to provide nationally representative data for the adult population of Great Britain
19. On 13 January this year, [the Lancet launched its inaugural Commission on Gambling](#) with an aim for "*transformational change in policy and political action*", describing gambling as having been "*neglected and understudied as a public health issue*"
20. Last week, the Committees for Advertising Practice published updated ['Age-restricted Ads Online' Guidance](#), that will help marketers to effectively prepare and target marketing communications responsibly with child audiences in mind.

So, all in all, and despite the temperatures currently affecting large parts of the UK, the player protection landscape has not exactly been frozen in time since we last assembled together.

4. Affordability

As mentioned, I have left out of my top 20 list what, in my view, is likely to be the biggest shockwave ever to hit the UK's online gambling industry when, as I believe is inevitable, the Gambling Commission will compulsorily require all of its remote B2C gambling operators to conduct defined affordability assessments at thresholds that are set, not by operators, but instead by the Commission itself.

That is the stand-out proposal in the Commission's current [Remote Customer Interaction Consultation and Call for Evidence](#), the expiry date for which has been [extended until 9 February](#), meaning there is still time for all interested parties to respond.

This affordability proposal is in line with a [call made by the Gambling Related Harm APPG](#) (in June last year) for affordability limits to be set and imposed by the Commission, even though at that time many in the industry pooh-poohed the idea of many of the APPG's recommendations meriting serious consideration.

Many have also suggested that, by effectively imposing monthly spending caps on gambling consumers, the introduction of the Commission's affordability proposal would constitute such a fundamental policy change affecting personal freedoms that it would be constitutionally wrong for it to be considered otherwise than in Parliament as part of the government review. There's little chance of that happening now, it would seem.

In my view, there can be no doubt but that this proposal will be implemented. For example, just bear in mind the following [words from the Commission's Executive Director Tim Miller](#) when the consultation was launched on 3 November last year:

"Whilst some operators have continued to improve their customer interaction processes, our evidence shows that many online operators are not setting thresholds for action at appropriate levels. They are not taking the appropriate action or acting quickly enough when they do identify risks of potential harm. We are clear on the need for gambling companies to take further action and that the Commission must set firm requirements to set consistent standards."

The Commission's Call for Evidence asks, amongst other questions:

1. what the thresholds for these affordability assessments should be,
2. about the nature of these affordability assessments, and
3. how operators are required to protect consumers following an assessment.

So what will those thresholds be and will they be linked to deposit or loss or both? The Commission has provided a clue, [saying](#):

"..... it may be worth considering that the Commission does not currently consider that a threshold in excess of £2000 would be realistic or appropriate, and indeed the evidence base may point to a threshold considerably below this. This is linked back to the evidence about discretionary income which shows that 98% of population have less discretionary income than this threshold"

adding:

"..... we are not – based on the evidence so far – considering a 'licence to gamble' which would require affordability checks to be conducted as a solely pre-emptive action for all consumers. This may indicate that the lowest possible threshold is likely to be at least £100 loss per calendar month".

Of course, the current consultation spreads broader than just that proposal. New LCCP customer interaction requirements will be imposed and a new remote customer interaction 'manual' will be created (in place of the existing remote customer interaction guidance) that the Commission [says](#) will "set out implementation guidance on how to meet each of these [new] requirements".

Anyone wanting to know more about the Commission's current affordability expectations would be well-advised to read the chapter entitled "Triggers and customer affordability" in its [Compliance and Enforcement Report](#) published in November.

In addition, the Commission's ["National Strategic Assessment"](#) (published on the same day) makes clear the regulator's opinion that "individuals spending more than they can afford to lose is one of the

harms most associated with gambling. Harm can be significant even at low spending levels as the level of spend at which harms begin to occur depends on the consumer's discretionary income".

Operators who still have affordability check thresholds set in the thousands of pounds (or other levels that do not take account of the affordability of a typical consumer) would be well-advised to check out a table within *"The person gambling – Customer affordability"* section of the [National Strategic Assessment](#) that shows the percentage of discretionary income (meaning how much an individual by age has left at the end of the month after accounting for taxes, bills, food and accommodation) using January 2020 YouGov survey data.

It also summarises case study examples of ineffective control frameworks that have resulted in regulatory action against operators, in which common issues include *"interventions not happening in a timely way with customers flagged as needing an interaction, but this not happening until the next day, or later, after the customer had spent life-changing sums of money"*.

The answer to the affordability conundrum probably lies in the ['single customer view' initiative](#) that was kicked off by the Gambling Commission nearly a year ago with the intention of creating a single industry-wide solution to help reduce gambling harm, in particular where customers have multiple online accounts. That initiative still has a way to go and involves the resolution of tricky data protection and privacy issues but, if its aims can be achieved, it will represent a very constructive step forward for all concerned.

5. The Gambling Commission

My player protection review of the past year would not be complete without passing mention of the criticisms heaped upon the Gambling Commission by parliamentarians during 2020.

No sooner had the [APPG](#) branded it *"not fit for purpose"* in the summer than the Chair of the [House of Commons Public Accounts Committee](#) described it as *"a torpid, toothless regulator that doesn't seem terribly interested in either the harms it exists to reduce or the means it might use to achieve that"*.

The [House of Lords Select Committee](#) on the Social and Economic Impact of the Gambling Industry didn't pull its punches either, its Chairman stating that *"lax regulation of the gambling industry must be replaced by a more robust and focussed regime which prioritises the welfare of gamblers ahead of industry profits"*.

6. Crystal ball gazing

My crystal ball assures me that the Gambling Commission will survive the government review, but what else does it tell me? I will limit it to my 'Super Seven'.

1. Increased Gambling Commission fees. This has to be 'a given'. When [launching the government review](#), the 'Gambling Minister' confirmed that:
"DCMS is already considering proposals from the Gambling Commission for a fees uplift to reflect the increasingly complex nature of the industry it regulates".
2. There will be considerable debate over the industry's fear (constantly emphasised by the BGC) that an *"unintended consequence"* of the Government's Gambling Review will be to drive

customers towards the illegal, online black market. The Gambling Commission clearly disagrees, its [CEO having said](#) as recently as 18 January:

“We know that licensed operators and their trade bodies are concerned about the impact of the illegal market, but our own evidence suggests that the impact may be being exaggerated. In any event, we are not convinced by the argument that suggests that raising standards in the licensed market will prompt consumers to gamble with illegal operators”.

3. I foresee more prescriptive requirements being introduced that will require UK licensed operators to enhance player protection by investing more in [technological solutions](#). The cost of this could well be outside the bounds of affordability for smaller remote operators, leading to greater numbers exiting the British market and/or greater consolidation of the market.
4. We will see some restrictions imposed on online stake, speed and prize limits. The clarity of my crystal ball in this respect is assisted by the Government’s [formal response to the House of Lords Select Committee’s Report](#) on the Social and Economic Impact of the Gambling Industry. Published on 8 December, it underlines the government’s desire to *“make sure customers are suitably protected whenever and wherever they are gambling, and that there is an equitable approach to the regulation of the online and the land-based industries”*. Although it doesn’t necessarily point to absolute parity with restrictions applicable to land-based gambling, it’s hard not to imagine that the existing disparity will not be addressed in some way.
5. I think it unlikely that a licensing system for affiliates will be introduced, not least because it might serve to erode the principle of UK licensed gambling operators being responsible for the actions of their affiliates. Indeed, in its same [Reply to the House of Lords Select Committee](#), the government has expressed its own similar concern and encouraged *“licensees and the affiliate industry to continue working together to raise standards”*.
6. I think we could well see establishment of a Gambling Ombudsman to determine consumer complaints, a proposal first put forward by one of the Gambling Commissioners in 2016, repeated by Tom Watson as a [Labour Party proposal in 2019](#) and now seemingly supported by many other parliamentarians.
7. Taking into account what the government has sensibly said about *“a robust evidence base” being “essential to effective policy making and regulation”*, I foresee no gambling advertising ban or prohibition of sports sponsorship by gambling operators being imposed, pending more definitive research on the impact of gambling advertising on adult gambling behaviours, bearing in mind that – whether rightly or wrongly – the government considers the existing evidence base does not demonstrate a causal link between problem gambling on the one hand and exposure to gambling advertising that complies with the current rules on the other.

7. Conclusion

To conclude, I wholeheartedly support [the government’s ambition](#) that the Gambling Act Review achieves *“an appropriate balance between consumer freedoms and choice on the one hand, and prevention of harm to vulnerable groups and wider communities on the other”* and that Parliament’s decisions in this respect are firmly based on the strongest possible evidence base rather than on misinformation and groundless speculation.

Just before I finish, my clearest forecast of all is that there will be plenty more to discuss at next year's KnowNow Player Protection Forum.

Anyone requiring further information on the above or on the licensing and regulatory services that we provide to all sectors of the gambling industry should not hesitate to contact us:

- **David Clifton:** dc@cliftdavies.com 07703652525
- **Suzanne Davies:** sd@cliftdavies.com 07767666300
- **Clifton Davies Consultancy Limited:** www.cliftdavies.com

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