

Minutes of Meeting

The second inquiry session of the Gambling Related Harm All Party Parliamentary Group's Inquiry into: Online Gambling - Assessing the Current Harm Prevention Provision

Date: Wednesday 24th April

Time: 14.00pm – 15.45pm

Location: Room M, Portcullis House

Chair: Carolyn Harris MP

Minutes taken by: Holly Ramsey, Interel UK

Evidence Heard From:

First Session

- Micah Willbrand, Managing Director, Experian
- Sarah Williams-Gardener, Director of Public Affairs, Starling Bank
- Stuart McFadden, Head of Financial Difficulties, Monzo Bank
- Robin Caller, CEO, Lolagrove Group

Second Session

- Fiona Palmer, CEO, GamStop
- Matt Zarb-Cousin, Director, Gamban
- Steve Moffatt, Public Policy Manager, Addaction

Members Present

Carolyn Harris MP
Iain Duncan Smith MP
Ronnie Cowan MP
Richard Graham MP

First Session 14.10 – 15.00

- **Carolyn Harris MP (Chair)** began the first evidence session by welcoming Micah Willbrand, Steve Moffatt, Sarah Williams-Gardener and Stuart McFadden, and asked them to introduce themselves.
- **Carolyn Harris MP** also acknowledged that even though the witnesses are not part of the gambling industry, they are still working towards helping problem gamblers. She also noted that the APPG wrote to the major banks including Santander, Lloyds, RBS and Barclays and received positive responses regarding their work towards helping problem gamblers.
- **Micah Willbrand** first explained that Experian over the past two years have been working towards addressing problem gambling and age verification, which appear to be the most pressing matters. He also welcomed the Gambling Commission's announcement on age verification that companies can no longer wait 72 hours to check someone's age, but age should be checked before someone gambles. Although additional steps can be taken.
- He added that more can be done on affordability as they have a lot of data available to work with. This will help gamers who are already in debt to avoid further debt. The APPG heard that 10 million people rely on credit cards just to cover everyday expenses and with the world moving to more technology, particularly in gaming and entertainment, he said this is going to cause increasing problems for people.
- **Stuart McFadden** then explained that Monzo are helping customers who find themselves in difficult and vulnerable situations. Monzo have a gambling block in place which people can choose to turn on. If a customer wanted to turn off this block they would have to go through customer support first to discuss why they want the blocker turned off, and then wait a further 48 hours before the blocker is turned off.
- **Stuart McFadden** said that Monzo want to provide as much support to customers as possible and that problem gamblers were an obvious group they could help within their customer base, which is a common issue. 80,000 people are using the block of which 10-15% are problem gamblers.
- **Sarah Williams-Gardener** introduced herself and noted that Starling Bank are doing the same as Monzo. They came about due to the disillusionment with the lack of change in banks that aren't focussed on customer needs. Starling Bank aims to reduce anxiety associated with finance and allow customers to track their spending in order to budget better and spot money problems. This form of banking also means you can spot money problems before they happen.
- She used an example of pharmaceutical companies in the 1990's who changed their paracetamol packaging by making the packets smaller and

limited the amount of packets you could purchase at one time. This resulted in a 43% decrease in use. This extra effort or friction actually mitigated an epidemic. Similarly, people who want to limit their spending on betting by having this extra layer of friction are able to remain in control of their spending.

- Starling Bank was the first to offer a gambling blocker after a customer and former gambling addict mentioned it would be very useful to have. Blockers can help a significant number of people as before banking gambling blockers existed, people had to go through various onerous processes to block their cards which was time consuming and also humiliating. Blockers have changed this.
- Customers are able to opt in to using this blocker and if they want to turn it off then a warning message is sent to the customer with information for gambling helplines. Around 20% of their customer base using this blocker which is around 75,000 people using this feature.
- **Sarah Williams-Gardener** also said it was heartening to see some of the legacy banks introducing their own blockers and most, if not all, will have this feature by the end of the year.
- She added that these blockers are a compelling example of disruptors bringing about change for good. They aren't being told to do this by policy makers but have built this technology from scratch themselves.
- **Robin Caller** then introduced himself and explained that Lolagrove are a data processor that help advertisers track personal information across the web on a lawful basis and with explicit consent. More than 50% of automotive manufactures use them to process customer and data enquiries. For example they move data from a website through their system checking it with a company like Experian and deliver the data to the data recipient such as BMW.
- **Robin Caller** then gave a more detailed example of how their software works. Lolagrove were asked to look into the idea of for example if someone wanted to buy a blue jumper from John Lewis but chose not to, could they then be sent an email by for example The Guardian about a blue jumper. Lolagrove built a platform to be able to do that, which is highly available across the entire UK marketplace.
- Another option is to de-target, for example if the jumper was purchased from John Lewis, then that customer no longer requires an email to encourage them to purchase a blue jumper. De-targeting can be used for existing customers, time wasters and unsubscribers.

- This work then led them to think about applying their software for sector solutions to deliver a solution to protect the vulnerable which could be used for gamblers or the charity sector for example.
- Lolagrove are in discussions with the gambling sector who have been receptive of this software such as William Hill, GVC and the ABB for example and the industry see the benefits in the software in unlocking efficiencies. This software can also be extended to sky, responsible banks and mobile networks.
- **Carolyn Harris MP** responded to Robin stating that the biggest problem they see is when people try to self-exclude from gambling online but are still targeted by the industry. She asked if what Lolagrove are offering could allow the industry to target and encourage people to bet or start gambling online?
- **Robin Caller** responded saying yes that it could possibly be the case and targeting is already happening and acknowledged that accidents can happen, but explained that de-targeting can be put in place.
- **Carolyn Harris MP** said that with the gambling industry she does not think accidents happen when it comes to targeting the vulnerable and that the industry are determined to use tools for their benefit.
- **Iain Duncan Smith MP** was concerned even with the technology being used to de-target because the gambling industry makes its money from problem gamblers and aren't interested in successful gamblers. Whilst Iain Duncan Smith can see the positives of problem gamblers being de-targeted from gambling advertisement, in the wrong hands this technology could have very negative consequences. The industry could use the technology to effectively target problem gamblers and de-target successful gamblers. This software is in the hands of the industry, and the industry has demonstrated the worst inclinations to help vulnerable.
- **Iain Duncan Smith MP** also added that the gambling industry cannot be trusted to use this technology to reduce problem gambling even though the technology is there to be used to de-target people. It can't be guaranteed that the industry won't abuse this technology to target problem gamblers. Could checks be put in place to ensure this technology is used properly.
- **Robin Caller** added re-targeting is already happening, but the key point is that there is the ability to reduce targeting vulnerable people and instead de-target them.
- **Carolyn Harris MP** asked if Lolagrove create a package to comply with what the purchaser is asking them to do.

- **Robin Caller** said they only act under instruction, so if the instruction was to de-target, then to target would be a breach of their contract.
- **Carolyn Harris MP** then pushed the point and asked if the industry asked to target these people who use gambling sites could the software do this.
- **Robin Caller** explained that their software does not include cookies, only personal information, and the decision on what to do with the data is up to the operator. He added that retargeting in its own right is a reasonable activity, but he took the point about the software being in the wrong hands.
- **Ronnie Cowan MP** said that the software is not the problem, its about putting it in the hands of responsible users. He said the problem is for the legislators to ensure that vulnerable people cannot be targeted in such a negative way.
- **Carolyn Harris MP** then asked the other witnesses if they issued credit cards.
- **Sarah Williams-Gardener** said currently no, but if they did they would have the same gambling block function.
- **Carolyn Harris MP** then asked when blockers can be turned off.
- **Sarah Williams-Gardener** said immediately but a notification comes up explaining what they are doing and directs them to the gamble aware helpline service. Starling Bank are looking into delaying the blocker being turned off for 24 hours but this hasn't been implemented to date and there is a grey area because payment services regulation states that customers must have access to their money at all times.
- **Stuart McFadden** added that Monzo keeps the blocker on for 48 hours after someone has requested it being turned off and the customer speaks to customer support. Monzo can then decide if they need to take further steps.
- **Iain Duncan Smith MP** asked if it would be obvious if problem gamblers were running into difficulties if they started moving their money around into different accounts, and would there be steps the banks could take to identify issues.
- **Sarah Williams-Gardener** said that both Starling Bank and Monzo offer pots in the same account where customers can put their money into for example for rent or savings, so customers have control. Overtime, they will be able to build up data about how customers who use blockers are behaving. It is feasibly something they could look into whereby a customer is sending a strong single something is going wrong. There is a fine line to

tread between acting like big brother and being able to empower the customer however.

- **Stuart McFadden** said that it was unrealistic to speak to everyone everytime money was being moved around into different pots but they are looking into merchant blocking.
- **Iain Duncan Smith MP** then asked if banks and a company like Lolagrove worked together, could it become obvious that an individual was being targeted?
- **Robin Caller** said that this would be possible.
- **Ronnie Cowan MP** interjected and said that there has been no indication that the industry is prepared to behave responsibly as their mind set is how can they extract as much money as possible from people.
- **Sarah Williams-Gardener** added that what they are doing is only one part of the solution.
- **Micah Willbrand** added that they are able to work with gaming associations and demonstrate where people are struggling financially. Limits on what gaming associations offer to those customers can be introduced. They are able to see trends that can trigger different products. For example if someone's affordability is better, then gaming companies can offer more expensive products and if someone's affordability is less, then they won't be offered the more expensive products. It is about ensuring people have money to spend before they are offered a products. Higher tier gaming companies are looking into this.
- **Richard Graham MP** said that is was difficult to grasp the extent to which technology can be a solution to a problem. Gambling companies say they have sophisticated mechanisms in place but it is important to know what technology they are actually using, particularly when it appears so easy to get around self-exclusion just by changing your name.
- **Carolyn Harris MP** questioned why banks would lend people money to gamble and why they aren't looking into where this money is going. She then cited an example of a problem gambler who used his mothers credit card to gamble £30,000 in just over an hour. She wondered why was the bank not blocking or checking this highly unusual activity despite some banks blocking people booking flights abroad. She said it was confusing as to why there wasn't any consistency.
- **Stuart McFadden** said it was concerning this happened as banks have a lot in place to stop this kind of activity and they are getting better at it. Currently, however, regulation is unclear and vague regarding responsibility and when intervention should take place. Challenger banks

are trying to look into confirmation of payee and overtime this should start to take place.

- **Iain Duncan Smith MP** then added that banks are in a similar place to gambling companies by which they make their money from people who owe them money.
- **Sarah Williams-Gardener** said not all act in such a way and are much more transparent.
- **Iain Duncan Smith MP** thought that Government should get involved in tackling the massive debt people incur on credit cards and began to question the role of Government.
- **Stuart McFadden** noted that Monzo doesn't provide credit cards but they do have overdrafts. When setting this up they had a discussion if people could use this overdraft to gamble. It was decided that it could be used because it would not be normal to restrict this, particularly when most people don't have an issue with gambling.
- **Carolyn Harris MP** then concluded the session thanking the witnesses and noted that their comments had given the group a lot to think about regarding the role of technology and problem gambling, as well as the role of Government.

Second Session 15:00 – 15:40

- **Carolyn Harris MP (Chair)** began the second evidence session of the APPG by welcoming Fiona Palmer, Matt Zarb-Cousin and Steve Moffatt, and asked them to introduce themselves.
- **Fiona Palmer** began by explaining that GamStop is a website where people register their details to be added to a national self-exclusion scheme. They can register for 6 months, 1 year or 5 years to block themselves from gambling online from British licensed operators.
- Operators are requested to check the register every time someone opens a new account with them. The website was switched live last year and they now have over 70,000 registrations.
- She said all large operators are all checking and actively registered despite it not being mandatory, there are only a small handful who are yet to register.
- **Steve Moffatt** from Addaction explained that they provide services to help people tackle their harmful behaviours such as drug and alcohol abuse, but also gambling. Addaction's interest in gambling starting a couple of years ago when a lot of their clients had gambling issues along with alcohol

issues for example. They saw a huge overlap between substance abuse and gambling problems.

- A big problem for Addaction was knowing where to refer problem gamblers, especially those living in remote areas. There aren't many specialists to help people with both gambling and alcohol issues. Addaction looked at the gambling industry regarding levels of harm and provision of help and saw that the industry hasn't worked towards the same level of harm reduction as has been seen with alcohol.
- **Carolyn Harris MP** asked how Addaction are funded and Steve Moffatt said mainly through local authorities but also clinical commissioning groups and the national lottery.
- **Matt Zarb-Cousin** explained his company called Gamban, which is a software that can be installed on any device which blocks gambling sites and access to gambling apps. It is designed so it can't be uninstalled or deleted by the user. The user will have to go to Gamban directly to ask to remove the software, and Gamban still have the ability not to act for at least a month.
- He also acknowledged that this software doesn't stop gambling addiction on its own but it is a step in someone's recovery path, working in conjunction with the likes of GamStop and Monzo. Of course, a determined user could buy a new device that Gamban is not downloaded to, or use a land based venue, so it is important to work together.
- However, in the time it takes to buy a new device, cravings to gamble will have lessened. The software is therefore helping on the treatment side, but more needs to be done on prevention as this is not the ultimate solution to addiction.
- **Matt Zarb-Cousin** went on to say however that there are still not adequate prevention services which is frustrating and he doesn't feel comfortable referring current treatment providers to people who are suffering from addiction. The gambling industry appear to be comfortable with the treatment side of the issue because harm has already taken place and profit has been made. Therefore prevention needs to be a clear focus.
- **Carolyn Harris MP** asked how Gamban was funded and **Matt Zarb Cousins** said the company was viable and there are some operators who are purchasing licenses from them.
- **Carolyn Harris MP** then asked for clarification if some online casinos buy licences from Gamban to offer to their customers who want to self-exclude.
- **Matt Zarb-Cousin** said that was the case as they want operators to align with them and encourage their customers to do as much as they can

instead of just self excluding which isn't that effective. A number of steps should be included into the self-exclusion process such as clicking for gam stop, clicking for gam ban etc.

- **Fiona Palmer** added that they have to provide a free service to users and the industry was behind them and are voluntarily paying substantial fees.
- **Carolyn Harris MP** asked if Gamstop accept that there are pitfalls in Gamstop, as were exposed in BBC's 5 Live piece.
- **Fiona Palmer** acknowledged this and agreed that some individuals will change their name to get around self exclusion, but added that since the programme changes have been made.
- **Carolyn Harris MP** pushed this point noting that people are saying they have registered with gamstop but are still gambling and can get around it.
- **Fiona Palmer** responded saying that is why self-exclusion is not a silver bullet, and neither is Gamban but when used together it makes the gaps to get around them smaller. Gamstop do not exist as a replacement for treatment but are a tool to help. They are aware that for the majority of users Gamstop is effective but there are concerns about getting around it and they are working towards addressing this.
- **Ronnie Cowan MP** then asked if facial recognition on handsets can help address some of the issues.
- **Fiona Palmer** said that this is an opportunity and **Matt Zarb-Cousin** also agreed, but said there has been a lack of support from apple and android. Apple could do a lot more and already have facial recognition. If this could be integrated into gambling blocking apps it would be hugely beneficial. Mobile networks and internet providers could also act to add another layer of protection.
- **Fiona Palmer** added that they have an aspiration to be the national scheme and are proud of what Gamstop is doing, particularly as people can self-exclude with much more ease now as they don't have to go to each individual operator anymore. She added that it was the industry that came together to create this.
- **Carolyn Harris MP** outlined her cynicism over self-exclusion as a lot of people she had spoken to who had self-excluded still received adverts to gamble.
- **Iain Duncan Smith MP** then asked which is more effective, Gamban or Gamstop.

- Both **Fiona Palmer** and **Matt Zarb-Cousin** agreed that it would depend on the individual and what approach works best for them.
- **Carolyn Harris MP** added that with Gamstop however they are dependent on the gambling operators' cooperation.
- **Richard Graham MP** said it was clear there is not one single full proof self-exclusion scheme that exists.
- **Steve Moffatt** said that is it important that as many tools are used as possible to help stop someone's addictive behaviour. But what is more beneficial is prevention to create a barrier in the first instance. Better understanding is also needed on what causes addictive behaviour. As a charity they are getting better at this understanding, but the gambling industry are not.
- **Iain Duncan Smith MP** said there was a clear overlap between alcohol, drug and gambling addictions and Richard Graham MP asked if there was an overlap in treating these issues.
- **Steve Moffatt** said treatments are that reducing your cravings are similar, so there is an overlap, but to first address an issue properly you need to know the causes.
- **Carolyn Harris MP** asked Gamstop if they signpost people to treatment.
- **Fiona Palmer** said they signpost people to a number of services such as Gamcare, Gamban, Debtline, Citizens Advice, amongst others.
- **Carolyn Harris MP** said there is still not enough money being put into those services and treatment. She asked the witnesses thoughts on a mandatory levy.
- **Steve Moffatt** agreed and Addaction have looked into the lack of treatment. He noted a case where it took one problem gambler 9 years to get into treatment. If it takes that long then the person is clearly not being made aware of what problem gambling is.
- **Carolyn Harris MP** asked if there should be gambling treatment in prisons like there is for alcohol.
- **Steve Moffatt** agreed and said if a problem is identified it should be treated in the same way as alcohol.
- **Ronnie Cowan MP** said he has seen maps where poverty and alcohol abuse seems to correlated in deprived areas, he asked if Steve thought this was the same for gambling.

- **Steve Moffatt** said the same level of research into gambling abuse is not available like there is for alcohol.
- **Richard Graham MP** noted that it was clear the Government hopes the threat of a mandatory levy will provoke the gambling industry to voluntarily give more. He asked if this approach has been done anywhere else?
- **Matt Zarb Cousin** mentioned that New Zealand has a mandatory levy. The levy is derived from sectors which cause the most harm and allocation of the levy is dependent on need.
- **Richard Graham MP** then asked what types of treatment work best.
- **Steve Moffat** said that Gamcare is good treatment, as is Gordon Moody in terms of outcomes. However he felt that how services are commissioned should be more transparent and treatment should be open to everyone.
- **Matt Zarb Cousin** also felt that there was no need to be dogmatic whether a levy is mandatory or voluntary but what is key is where the levy goes and the industry shouldn't be able to choose where money goes.
- As the meeting was concluding Nick Harding, a member of the public asked if the Gambling Commission were present as they need to be made aware of the APPGs discussions. The Gambling Commission were present and Carolyn Harris MP confirmed that the APPG also make the Gambling Commission aware of the sessions.
- Tony Kelly, another member of the public also asked if he thought more awareness should be made about problem gambling in schools.
- **Iain Duncan Smith MP** agreed and **Richard Graham MP** also added that awareness should include going to colleges and universities too.
- **Carolyn Harris MP** then thanked all the witnesses for attending and giving their evidence and stated that the next APPG meeting would be on the 8th May at 2pm.

Meeting concluded at 15.45pm

External Guests

- Tosin Adedayo, Interel UK (Secretariat)
- Katherine Morgan, Interel UK (Secretariat)
- Holly Ramsey, Interel UK (Secretariat)
- Wes Himes, Remote Gaming Association

- Paul Terroni, Novomatic
- Nick Harding, Gauselmann
- Will Durant, RSPH
- Leslie Mcleod-Miller, LLM
- Holly Johal, Hanover
- Julia Gray, Gambling Commission
- Eleanor Curry, DCMS
- Kate Reynold-Jones, Gamstop
- Nina Doehmel-Macdonald, Atlas Partners
- Tony Kelly, Red Card Gambling Support Project
- Dr Jane Rigbye, GambleAware
- Tiffany Trenner-Lyle, Camelot
- David Altaner, Gambling Compliance
- Ralitsa Vissilovska, LolaGrove
- James Noyes, Tom Watson MP's office
- Adenike Adebisi, Money and Mental Health
- Sarah Bunn, POST Parliament
- Philip Newall, Warwick University
- Derek Lloyd, The Football Pools
- Alexandra Freat, Starling Bank
- Lauren Beadle, Lord Chadlington's office
- Timothy Cho, Fiona Bruce MP's office
- Charles White, Bishop of St Alban's office