

Response ID ANON-7F6D-N78G-U

Submitted to **Discussion on a new national strategy to reduce gambling harms, and Consultation on proposed amendments to LCCP requirements on gambling businesses to contribute to research, prevention and treatment**

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Introduction

1 What is your name?

Name:

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2 What is your email address?

Email:

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3 Are you responding as an individual or on behalf of an organisation?

Charity

4 What is the name of your organisation (if any)?

Organisation:

Young Gamblers Education Trust (YGAM)

5 The Privacy Notice (link below) sets out how we will use your personal data under the Data Protection Act 2018, and requests your consent to do so. Please confirm you have read this notice and give consent for your personal data to be processed in accordance with the Privacy Notice. You can withdraw your consent at any time by contacting safergambling@gamblingcommission.gov.uk

Please tick the box to confirm you have read the Privacy Notice:

Yes

YES - I give consent to the Gambling Commission publishing my name and organisation to indicate I have responded to this consultation.

6 When publishing the results of our consultations, we include comments that have been made in the responses but do not attribute comments to any individual or organisation. This means that we may include your comments in an anonymised form if you give your consent. You can withdraw your consent at a later date if you choose. Are you happy for anonymised comments to be included in the results of this consultation/ discussion?

Yes, I am happy for anonymised comments from my response to be published

The current National Responsible Gambling Strategy

7 Do you have experience of the current National Responsible Gambling Strategy?

Yes

8 What are your experiences of the current National Responsible Gambling Strategy?

Tell us about your experiences of the current strategy:

YGAM are members of the Responsible Gambling Strategy Board (RGSB) Advisory Group and so it has been pleasing to witness the progression of the current strategy and meet many of the current stakeholders. Progress against the current strategy has been good in some Priority Actions and we have witnessed some useful cross-industry collaboration (i.e. around self-exclusion). However, the current strategy, while bold and thorough YGAM feels it has too many priority areas (i.e. Priority Actions). The sheer number of Priority Actions has meant that some priorities have been slow or very limited in their progress. YGAM agree with the emerging strategy and the (i) focusing of priorities and (ii) reducing the number of priorities overall.

YGAM has witnessed tension between licensed operators and the principal Research, Treatment and Education (RET) commissioner which has not been helpful given RET funding ultimately is the principal economic driver of the strategy in the absence of a public health funded model. We note too that many of the objectives in the current strategy appear not to have been achieved; and support the proposal to widen the range of organisations engaged in delivering the future strategy.

We agree with the Commission's view that many see the current national strategy as the 'RSGB strategy', suggesting a lack of buy-in from key stakeholders. Broadening the range of organisations engaged in delivery of the strategy and enabling 'organisations to become champions' of the new strategy (and newly named, specific Priority Areas) would be a useful way forward. We are also hopeful that the new, emerging strategy will provide a clear governance structure for organisations interested in reducing gambling harms to get behind, unite and deliver.

Finally, we are hopeful the new, emerging strategy will provide an opportunity for those with lived experience to directly contribute. YGAM has views on how this

might be achieved as below.

A new national strategy to reduce gambling harms - our approach

9 What are your views on our overall approach to the strategy from defining the problem through to ensuring widespread adoption of good practice?

Views on our overall approach:

YGAM is encouraged that a theme of implementation will be protecting children and young people. We agree with the definition of harms being 'the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society'. Four years of experience at YGAM tells us that focusing on the health & wellbeing of consumers (and affected others) and building (particularly in young and vulnerable people) their digital resilience is fundamental to reducing harm.

The proposed 'Approach' to the strategy is clear, robust and – subject to available resources - deliverable. On the note of wide spread adoption of 'good practice', we believe those willing to contribute to the strategy must be supported, whilst being held accountable through good governance and scrutiny arrangements with the Commission. To ensure stakeholder buy-in of the five Priority Areas, we would favour an approach of joint authorship around key-deliverables, so they are realistic yet challenging and more importantly coordinated in terms of reporting and sharing progress.

Priorities for the new strategy

10 Do you have any views on what should be prioritised under a new national strategy?

Views on priorities:

All five Priority Areas are of equal measure and should be prioritised under the new strategy.

Naturally operators consider their RET donations in April (being the start of the new financial year) and so a priority might be to agree which organisations can receive RET funding under the proposed LCCP guidance as below. Some excellent organisations in this space (namely GamCare and Gordon Moody) currently have multi-year funding agreements in place with GambleAware, so a consideration of the Commission might be to prioritise areas of the strategy where such agreements are not in place for RET funding so enable purposeful activity to be delivered in year-one.

We believe that licensed operators may consider increasing the amount of RET funding they currently contribute, through meaningful collaborations with 'approved organisations' (i.e. those on the RET register) that are delivering and championing the new strategy. Obvious priorities here 2, 3 and 5 given progress already happening. A slight concern would be spending too much time on Priority Action one, meaning that tangible action, evaluation and wide spread adoption may be put at risk.

Priority Area 1: Research to inform action

11 To what extent do you agree with the proposed actions for Priority Area 1: Research to inform action?

Agree with actions - Creating an independent data repository to facilitate research:

Strongly agree

Agree with actions - Increasing research capacity and quality through research centres:

Agree

Agree with actions - Improving links between research and policy using a research hub:

Strongly agree

Agree with actions - That creating a data repository should be a Year 1 action:

Neither agree nor disagree

12 Do you have any other comments on Priority Area 1: Research to inform action? For example, what other actions should be considered? How could these actions be taken forward and which organisations should be involved?

Other comments on research priority area:

In our response to this question, we will focus on theme five 'Education and Prevention'. We do have some emerging research here and insight to progress. For example, guided by the recommendations of the Responsible Gambling Strategic Board 'Gambling and Children and Young People: A Case for Action' paper which was published on 26 June 2018, YGAM proposes to deliver a national education strategy for young and vulnerable people which will complement four of the nine RGSB principals which are clearly aligned with our social purpose. Namely Principle 1: Commercial gambling should be regarded primarily as an activity for adults; Principle 4: Priority should be given to protecting children and young people from the rapidly developing risks of online gambling; Principle 7: Children and young people have a right to information about the risks of gambling and Principle 8: Parents and families can and should play a significant positive role in reducing the risks of gambling-related harms affecting children and young people.

In addition, the YGAM programme has been evaluated by City, University of London and is the only education programme to hold a combination of the Pearson Assured quality-standard, PSHE Association quality-mark and ASDAN accreditation in this space. YGAM is also working with City & Guilds to achieve its Assured quality standard (Q2 2019) and we have just commissioned a study by Redbrick Research to look specifically at student gambling in universities (reporting Q3 2019). We consider that our approach to accreditation and evaluation may have value to other organisations working in the field of preventative education.

YGAM is working with Policy Connect to host a Parliamentary symposium in Q2 2019 specifically looking at the convergence of gaming into gambling. We realise

that the video games market sits outside the Gambling Commission's area of oversight , but given public concerns, this might be something that would warrant research, potentially in year three of the emerging strategy.

Finally, we believe GambleAware is well placed to lead the research Priority Area given its expertise in this space. In addition, we feel other organisations contributing to the national strategy who are listed on the RET register should contribute insight their programmes will gain (i.e. GamCare, Gordon Moody, YGAM etc).

Priority Area 2: Prevention

13 To what extent do you agree with the proposed actions for Priority Area 2: Prevention?

Agree Priority 2 actions - To measure harms of gambling:

Strongly agree

Agree Priority 2 actions - Support public health model for prevention & education:

Strongly agree

Agree Priority 2 actions - Support national and local public health plans:

Strongly agree

Agree Priority 2 actions - Significant progress on measuring harms as a Year 1 action:

Strongly agree

14 Do you have any other comments on Priority Area 2: Prevention? For example, what other actions should be considered? How could these actions be taken forward and which organisations should be involved?

Other comments priority 2: Public health, prevention and education:

This area of the strategy is core to the social purpose of Young Gamblers Education Trust (YGAM). Like Priority Area three: Treatment we hope this area will be opened to enable new providers to have equal footing in the delivery of the national strategy. While YGAM agrees that a broad interpretation of 'education' should be considered, the Commission, in order to safeguard the integrity of the strategy and mitigate risks, might consider a set of principles around the content of education to maintain a national standard of quality. We also have views of the governance arrangements for those wanting to deliver against Priority Action 2 – covered in question 26.

Gambling is a risky activity that young and vulnerable people participate in. As such, education that is focused on prevention should not be glamorised and while YGAM agrees that lived experience is an important component this should not be the sole bases of such a programme.

We believe organisations wishing to deliver in this space should have, at the very least, achieved a nationally recognised quality-assurance mark for the educational rigour, delivery, impact and leadership of their programme (such as the PSHE Association quality-mark). Any nationally recognised quality-assurance mark should be able to evidence the leadership of teaching and learning; quality-assurance and continues improvement cycle; outcomes achieved by learners; teaching colleague professional development and assessment practice; data management and content, relevance and quality of programme. Such a robust approach will help to minimise programmes that may have good intentions, but unknown consequences. Such an approach will also enable a programme to stand up to public scrutiny and help maintain the overall approach and quality within this Priority Area.

We also believe that facilitators should be trained to a minimum standard of Level 3 Award in Education and Training (RQF) qualification (or equivalent). This is ideal for anybody who delivers training in the workplace or wishes to teach in the further Education & Skills Sector and forms a foundation for those with little or no previous experience of teaching or training. This award is also required for anybody teaching a range of regulated qualifications and awards provided by awarding organisations. Previously this qualification was known as PTLLS and again is an established benchmark within teaching – helping to maintain high standards for learners. Finally, we believe that the use of Disclosure and Barring Service (DBS) enhanced checks should be mandatory for all persons going in to educational institutions (such as schools, youth centres, universities etc).

YGAM does have views on which type or organisations should contribute to Priority Action 2 – see question 26.

Finally, the scaling up of preventive education should be considered as part of the strategy in year 1 – aimed at (i) young and vulnerable people in schools, youth centres, colleges, universities other high risk areas and (ii) the scaling up of parent's awareness programmes. This will ensure a timely start to delivery of the new strategy, bring insight in a timely manner and engage parents or guardians.

Priority Area 3: Treatment

15 To what extent do you agree with the proposed actions for Priority Area 3: Treatment?

Agree Priority 3 actions - Evaluation and needs assessment:

Strongly agree

Agree Priority 3 actions - Progress towards truly national treatment:

Strongly agree

Agree Priority 3 actions - Strategic partnership for gambling and other harms:

Strongly agree

Agree Priority 3 actions - Evaluation and needs assessment as Year 1 action:

Agree

16 Do you have any other comments on Priority Area 3: Treatment? For example, have we adequately mapped the current treatment provision? What other actions should be considered? How could these actions be taken forward and which organisations should be involved?

Other comments Priority 3:

Treatment is not a specialist area of YGAM and so we are not experienced to provide answers here.

However, YGAM strongly believes that the current arrangement of GamCare being the lead organisation, supported by a network of treatment providers for treatment should remain (if anything to help consistent Safer Gambling messaging in gambling venues / products). We however feel the number of treatment providers should be increased in the pool. We would be interested to learn more of plans to develop specialised treatment clinics under the NHS long term plan and consider that residential treatment services ought to be expanded through the Gordon Moody Association.

Priority Area 4: Evaluation

17 To what extent do you agree with the proposed actions for Priority Area 4: Evaluation?

Agree priority actions 4 - Embed use of evaluation through evaluation protocol:

Strongly agree

Agree priority actions 4 - The regulator and government to lead by example:

Strongly agree

Agree priority actions 4 - Explore use of central/ co-ordination evaluation body:

Agree

Agree priority actions 4 - Embed evaluation protocol as Year 1 action:

Strongly agree

18 Do you have any other comments on Priority Area 4: Evaluation? For example, what other actions should be considered? How could these actions be taken forward and which organisations should be involved?

Other comments priority 4:

We agree with the Commission's summary that the approach to evaluation and finding out what works remains patchy and there is a potential risk of pilots or trials occurring without proper, proportionate evaluation, which hinders progress towards understanding what works and the impact on consumers. The single biggest thing that would help an organisation such as YGAM would be to support our programme of research, evaluation and continuous improvement. As our charity is firmly rooted in education and not supported by the principal commissioner. Therefore, we have developed our research and evaluation methodologies which are used within and recognised in formal education. This has helped enormously to get the charity transaction and give confidence to our customers (i.e. schools, colleges, youth clubs and universities) of the educational rigour and professionalism of our education offering. Some educational organisations would value a full, multi-year, controlled group comparison evaluation; the vast majority are guided by pupil welfare (for their Ofsted Inspection) or activities that contribute to functional skills.

Priority Area 5: Gambling businesses

19 To what extent do you agree with the proposed actions for Priority Area 5: Gambling businesses?

Agree with Priority Area 5 Actions - Focus industry efforts for safer gambling:

Strongly agree

Agree with Priority Area 5 Actions - To properly evaluate and compare initiatives:

Strongly agree

Agree with Priority Area 5 Actions - To ensure widespread adoption of current best practices:

Strongly agree

Agree with Priority Area 5 Actions - Focus industry efforts as Year 1 Action:

Strongly agree

20 Do you have any other comments on Priority Area 5: Gambling businesses? For example, what other actions should be considered? How could these actions be taken forward and which organisations should be involved?

Other comments Priority 5:

UK licensed operators are without doubt key to the delivery of the national strategy and we feel Priority Area 5 should appear as one rectangular block beneath all the other Priority Areas rather than being a vertical priority at the end of the proposed model.

YGAM strongly believes in robust enforcement of the licensing objectives. However, we sense there is a risk that should the regulator and operators drift apart, then ownership of the national strategy will appear fragmented. All key stakeholders have a duty of care and a responsibility for the ownership and delivery of the new strategy and it would not be helpful if we are failing at this most basic hurdle.

YGAM supports operators targeting collaborations (i.e. collaborative approach to self-exclusion) and considers that much more can be done in this area. For example, collaborating around colleague training to achieve a minimum national standard / qualification for customer facing roles would be helpful; as would operators collaborating to establish an industry-wide apprenticeship scheme.

Summary of discussion on the new strategy

21 To what extent do you agree with the emerging content of the new national strategy to reduce gambling harms?

Summary respondents - Overall aim to reduce gambling harms:

Strongly agree

Summary respondents - The overall approach: define problem through to adopt best practice:

Strongly agree

Summary respondents - Priority Area 1: Research to inform action:

Strongly agree

Summary respondents - Priority Area 2: Prevention:

Strongly agree

Summary respondents - Priority Area 3: Treatment:

Strongly agree

Summary respondents - Priority Area 4: Evaluation:

Strongly agree

Summary respondents - Priority Area 5: Gambling businesses:

Strongly agree

22 Do you have any other comments on the emerging proposals for the new national strategy to reduce gambling harms?

Any other comments:

We agree with the emerging content; however, we would ask you to consider placing Priority Area 5 beneath Priority Areas 1 – 4 as a single rectangular shape to emphasis the need for the industry to organise, collaborate and own the national strategy.

What does not come through strongly in any documentation we have read is the parameters of a national education strategy and what this might look like. I have therefore uploaded the proposed YGAM three-year education strategy, in the spirit of collaboration which we hope to consultate with the Commission (along with a range of other stakeholders) before we formally publish in Q1 2019.

Upload here:

Strategy_Doc_2019_2021_v3 (1).pdf was uploaded

Consultation on proposed amendment to LCCP requirement for businesses to support research, prevention and treatment of gambling harms

23 Do you broadly agree with the proposed change to our requirements to give clarity to operators on where contributions made under the LCCP requirement may go?

Yes, I broadly agree with the proposed change

24 Do you have any comments on the proposed drafting of the provision?

Comments on draft requirement on businesses:

No

25 Do you have any other comments on the requirement on businesses?

Comments on requirements on businesses:

No

26 To what extent do you agree with the principles for bodies signing up to delivery of the new strategy?

Agreement with governance principles - Independence:

Strongly agree

Agreement with governance principles - Openness and transparency:

Strongly agree

Agreement with governance principles - Integrity:

Strongly agree

Agreement with governance principles - Clarity of purpose:

Strongly agree

Agreement with governance principles - Effectiveness and accountability:

Strongly agree

27 Do you have any other comments on the proposed principles?

Comments on governance principles:

YGAM agrees with the proposed principles, but we believe that scrutiny around the governance arrangements of organisations seeking RET funding would benefit from being tighter.

For example, organisations suggesting they are charities should be formally registered with the Charity Commission and have an independent (or majority independent) board of trustees. Organisations who are suggesting they are social, not-for-profit enterprises should be listed and constituted as such with Companies House, again with a formal independent (or majority independent) NED board who are legally responsible for the governance of the organisation. Organisations that are Limited Businesses to drive shareholder income should be transparent on this.

As suggested to the answer for question 14, lived experience has an important role to play to the delivery of the strategy. YGAM has witnessed several former gambling addicts wanting to give back and as such, some have established their own organisations to do this. While this should be encouraged, scrutiny of these organisations is important particularly where the founder has been convicted of 'theft by employee or fraud' as part of their addiction. Scrutiny of public information, governance and internal financial arrangements should in particular be evaluated. Ownership and legal structure of the business should also be considered as well as their business resilience and infrastructure to deliver quality interventions should be evaluated and well as finance and organisational risk. Therefore, we agree an appropriate governance framework should be in place for any organisation wishing to deliver.

28 We believe it is implicit that most funding under the LCCP requirement will be targeted at reducing gambling harms in Britain. However, in order to promote the principle of international co-operation, we recognise there may be instances where organisations signed up to deliver the strategy are based in other jurisdictions. We are of the view that in these circumstances their work should have a clearly defined link to the impact of reducing gambling harm in Britain. To what extent do you agree with this assessment?

Strongly agree