

# GAMBLING COMMISSION

17 November 2009

Baroness Neuberger DBE  
Chair, Responsible Gambling Strategy Board  
House of Lords  
SW1A 0AA

Dear Julia

## **Gambling Commission response to the Responsible Gambling Strategy Board's initial strategy and priorities**

On 14 October 2009, the Responsible Gambling Strategy Board published their initial recommendations and priorities for research, education and treatment. This letter (and the attached Annex) represents the Gambling Commission's formal response to that advice.

The Commission thanks the Strategy Board for producing their first formal advice. The publication of this report marks an important step forward in the development of a national responsible gambling strategy, in identifying the areas that the Strategy Board sees as the key initial priorities for the three components of that strategy.

The report also sets out the framework within which the Responsible Gambling Fund (RGF) can distribute the funds received from the industry (via GREaT), more effectively. It also provides the starting point for the Strategy Board's consultation with RGF, GREaT, the Commission and DCMS on the quantum of funding that will need to be raised from the industry over the three years to 2012/2013.

We recognise the impact that delays and difficulties in establishing the voluntary funding arrangements and reconvening RGF have had on the work of the Strategy Board to date. We appreciate that as a result of these external influences the advice provided at this stage is of a more interim nature than either the Commission or the Strategy Board would have ideally wished.

The Strategy Board has said that it will produce a full set of advice no later than summer 2010, and the Commission welcomes this. We understand that the Strategy Board will be working closely with key stakeholders and experts over the coming months to develop that advice. The Commission looks forward to playing an active part in that process, to receiving any further advice the Strategy Board may produce in the interim, and to the publication of the full report by summer 2010.

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We are grateful to Stephen Dunmore for his attendance at the Commission Board meeting on 29 October, when your report was discussed. Stephen was able to provide helpful clarification of the Strategy Board's thinking on a number of points and issues raised. A summary is attached at **Annex A**

The Commission appreciates the priority that the Strategy Board has given to the areas in which it has previously requested specific advice, namely:

- **a national telephone help and advice line**, which was identified as a priority by the RET report, since it had been an outstanding issue for some time (the need having first been identified in 2003) and therefore an area where action was overdue
- **the business case for a longitudinal study** or whether there are better and more cost effective means of gathering information on the causes of problem gambling
- **high-stake high-prize gaming machine research** taking forward a programme of work which builds on that initially undertaken by the Commission.

and we look forward to the development of these areas over the coming few months, where appropriate through RGF's provisional programme of work.

We also welcome the Strategy Board's clear emphasis on the importance of building proper, independent, evaluations into projects and programmes from the outset. The Commission, others who advise on gambling regulation and the industry bodies providing funds, have a clear common interest in developing an understanding of what works and of how to use the funds available most effectively. A robust evaluation framework will greatly assist with this.

In light of the delays experienced to date, the Commission understands, and accepts, that it will now take longer than originally planned to move to a full scale commissioning approach typically with three-year rolling contracts. We welcome the Strategy Board's recognition of the need to work with existing providers during the transition period, and their commitment to simultaneously working with these providers (and other potential contractors) to introduce clear specifications of services, and associated evaluation.

We understand that the shared executive (which provides support to both the Strategy Board and RGF) are planning to hold a series of stakeholder events over the coming months, with the support and involvement of the Expert Panels which advise both organisations. The aim of these events is to enable the development of a costed three-year implementation plan by spring 2010. The Commission looks forward to making a full contribution to this phase of the Strategy Board's work.

I hope that our response is helpful, and look forward to seeing you at the forthcoming Commission Board meeting on 26 November. If there are any areas that require further discussion or clarification, we can of course talk about them then.

Yours sincerely



Brian Pomeroy  
Chairman

**Summary of points and issues raised by the Gambling Commission's Board at their meeting on 29 October 2009, in relation to the first published advice from the Responsible Gambling Strategy Board (14 October 2009)**

The Responsible Gambling Strategy Board published their initial strategy and priorities on 14 October 2009. The Gambling Commission Board discussed the advice at their meeting on 29 October 2009. Stephen Dunmore, Interim Chief Executive of RGSB and RGF was in attendance for this agenda item.

The Board requested advice and clarification on a number of points and issues related to the content of the report, Stephen Dunmore was able to provide helpful clarification and exposition of the Strategy Board's thinking in relation to these, as summarised below.

**1. Evaluation**

- 1.1 There is a common understanding between the Commission and the Strategy Board that evaluations must be based on agreed criteria, and conducted throughout the life of funded projects.
- 1.2 Those criteria should be set at the outset of a project, and all performance measured against them. However, where this is not currently the case, an attempt should be made to implement retrospective criteria, targets and evaluation.
- 1.3 Evaluation should be carried out professionally and independently of the providers (but in a way that minimises the impact on existing service delivery).

**2. Role of the NHS**

- 2.1 It was confirmed that the Strategy Board had taken as a starting point the current approach, whereby :
  - the government and NHS maintain that the NHS will provide clinical services for those needing medical or psychiatric treatment; and
  - it is accepted that the industry should fund signposting and advice services for those with problems related to gambling who need social, financial or other support, including brief interventions, counselling or treatment. The Strategy Board takes as accepted the distinction between pathological gamblers whose needs are analogous to those of other addicts, and the wider group of people who suffer from gambling-related harm.
- 2.2 Within that context, the Strategy Board supports some limited spending (on the Soho clinic and two further NHS pilots). Funding for these will be tapered. These pilots will provide important input to the development of a national responsible gambling strategy, and will also enable the Strategy Board to provide advice to the Commission and government on the scope for, and cost of, successfully treating those with serious gambling problems.

2.3 Outside this pilot scheme, it was confirmed that the Strategy Board's proposed support to the NHS is currently confined to piloting training programmes for GPs (along with a range of other front line professionals – eg community workers and occupational health professionals) in identifying the signs of problem gambling in those that present to them, and ensuring that these people are signposted to appropriate help services or treatment providers.

### **3. Education**

3.1 It was accepted that education aimed at preventing or minimising gambling-related harm needs to be targeted at a range of distinct audiences, which can be divided broadly into actual or potential gamblers on the one hand, and intermediaries (such as health care workers or debt counsellors) on the other, who would come into contact with, but not necessarily recognise, those people who needed help with gambling-related problems. The Strategy Board is clear that their approach differentiates between these groups.

### **4. Research**

4.1 In respect of a longitudinal study, concern was raised that the Strategy Board's advice had not taken full account of the existing research material and limited conclusions in the public domain. It was also noted that the scope of the Strategy Board's planned research currently appeared narrow.

4.2 The Strategy Board's initial recommendations in the area of research have been based on the work done by the Commission (in terms of producing the RET review report, and further work over the past year), and also take account of a range of other publications in the field.

4.3 In terms of a longitudinal study, the Strategy Board has reviewed the available research material, but does not consider this makes a clear case for a longitudinal study as opposed to other ways of exploring causality. For this reason, it has recommended that further thought be given to this issue as a priority, and the Research Panel will be working with experts over the coming months to assess the business cases for a longitudinal study and for other options.

4.4 Alongside work on underlying causes of problem gambling, the Strategy Board is keen to support research which has more immediate practical application and will be making that clear in its approach to research proposals.

### **5. Telephone help and advice line**

5.1 The Strategy Board's starting point, building on earlier work with GamCare, the Responsibility in Gambling Trust and the Commission, was that there should be a single, nationally funded, telephone and advice line, and that this line should be:

- free to as many callers as possible
- available up to 24 hours a day, seven days a week
- able to transfer people to counsellors where needed.

- 5.2 Stephen Dunmore confirmed that whilst the help and advice line should be run independently of any particular provider, that would not, of course, rule out the current provider of the main telephone helpline from bidding to provide such a service. Indeed, they should be well placed to do so.
- 5.3 In the Strategy Board's view what is critical is to move, as quickly as is compatible with maintaining service provision in the interim, to a position where the service is properly commissioned, targets set and performance evaluated.

## **6. Costed programmes**

- 6.1 As there had been considerable delay, both in securing agreement for the voluntary funding system and then in implementing the agreed structure, and since the joint executive for the RGSB and the RGF was still being set up, the Strategy Board had been forced to rely heavily on the analysis in the RET report in relation to the likely costs of programmes.
- 6.2 Similarly, the move to funding programmes on the basis of three year (rolling) contracts envisaged in the RET report and strongly supported by the Strategy Board was dependent on the development and implementation of the commissioning strategy being taken forward by RGF.
- 6.3 The Strategy Board expect that RGF will be in a position to announce a costed three year programme (in line with the Strategy Board's advice) by spring 2010, at which point the commissioning process would begin.
- 6.4 This will take into account the dialogue planned over the coming months with a wide range of stakeholders and service users.