

## Response

Thank you for your request for information relating to assurance statements. Unfortunately, due to an administrative error, this was not processed in the way it should have been causing a delay in you receiving your response; please accept our sincere apologies for any inconvenience which has been caused by this delay. This issue has now been addressed.

One of the most significant ways we show our commitment to protecting consumers is through helping operators raise their standards. We introduced our assurance statement process for the 44 largest gambling operators in 2015.

There has been a long period of engagement with gambling operators to establish this process and create the right conditions for them to provide detailed information to us in order for us to develop more informed policy and to increase our understanding of the market. Throughout this process, there have been concerns raised by operators that the information would be publically disclosed and that doing so could be prejudicial to their commercial interests. We have maintained that this material would be treated as being provided in confidence, acknowledging that any request would need to be taken on a case by case basis taking into account the circumstances that exist at the time. Releasing this information without a good reason for doing so would negatively impact on a process which we invested a great deal of time in. This is especially relevant at this time as we are currently preparing for this year's submissions to be made and disclosure at this point would greatly impact on the material that is submitted in these returns. The returns ask only high level questions but we encourage operators to be as thorough and as detailed as possible. They would not do this if they believed that the information would be released and the quality of the information we receive would suffer.

We do however recognise that there is value in providing a level of commentary in this area using the information we are collecting. If there are key themes or areas of best practice that would be beneficial to share more widely then we will publish this information at a later stage.

In addition to the impact on our regulatory process, given the sensitive nature of the information contained within the annual assurance statements, the Commission is of the view that these should be withheld on the basis that it would be prejudicial to the commercial interests of the operators. The information which we have placed a requirement on operators to provide is not otherwise in the public domain and relates to the running of commercial enterprises. Furthermore, there is reference to anti-money laundering (AML) information such as lessons learned by their MLROs; disclosing this would allow those looking to launder money to avoid controls that are in place.

Further explanation of these exemptions can be found in the attached document.

Contained within these documents is information regarding remuneration or specific responsibilities that could be attributed to an individual by information that is available elsewhere in the public domain (such as LinkedIn). It would be disproportionate for us to publically disclose information which could lead to the identity of these individuals given their position within the organisation unless there is a strong public interest in doing so. These individuals have a legitimate expectation that their personal details will not be disclosed unnecessarily as they are not public facing roles or roles that are senior enough to warrant their identities being made publically available. On balance, there is no legitimate public interest in disclosing their identity and it would not be fair to do so. This information is therefore exempt under section 40(2) of the Freedom of Information Act 2000.

## **Review of the decision**

If you are unhappy with the service you have received in relation to your Freedom of Information request and wish to make a complaint or request a review of our decision, you should write to FOI Team, Gambling Commission, 4th floor, Victoria Square House, Victoria Square, Birmingham, B2 4BP.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner (ICO) for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by the Gambling Commission. The ICO can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## **Request**

Please consider this a formal request under Freedom of Information Act.

I would like to see the Annual Assurance Statements submitted by gambling businesses, as referenced here:-

<http://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/General-compliance/What-you-need-to-tell-us/Annual-assurance-statements.aspx>

I am only seeking the Statements for the most recent year for which they are available.

As your website makes clear, the statements are "concise" and only submitted by a small number of firms, so I hope the request should not be too burdensome.