

Invitation to Tender
Issue date – 1st February 2016

Independent Evaluation of the Association of British Bookmaker's 'Player Awareness System' for gaming machines in licensed betting offices

1. About Responsible Gambling Trust (RGT)

- 1.1. RGT is the leading charity in the UK committed to minimising gambling-related harm. As an independent national charity funded by donations from the gambling industry, RGT funds education, prevention and treatment services and commissions research to broaden public understanding of gambling-related harm. RGT's aim is to stop people getting into problems with their gambling, and ensure that those that do develop problems receive fast and effective treatment and support.
- 1.2. RGT develops its commissioning plans in collaboration with the Responsible Gambling Strategy Board (RGSB) and the Gambling Commission. These arrangements are underpinned by an 'assurance and governance framework' agreed between the three parties and rely on openness, transparency and partnership to deliver results.

2. About the Association of British Bookmakers

- 2.1. The ABB is the trade organisation for the UK's high street betting shops, which have been trading on the high street for over 50 years. As one of the UK's leading leisure retail sectors, bookmakers serve over eight million customers, employ over 40,000 people and contribute over £3bn to the UK's economy.
- 2.2. ABB membership ranges from major national operators to single, family run businesses and collectively, it represents 80% of the sector. They include four out of the largest five operators: William Hill, Ladbrokes, Gala Coral and Paddy Power. ABB members work to the high standards of responsible gambling set out in its Code.
- 2.3. The ABB promotes and represents the industry to decision makers and in the media, and is responsible for making submissions to the Government or Gambling Commission on matters affecting shops.
- 2.4. The ABB aims to help create and sustain conditions in which socially responsible betting shop operators can compete and prosper.

3. Background

- 3.1. The gambling industry is undertaking a number of initiatives to prevent gambling related harm. Both the RGSB and the Gambling Commission have emphasised the importance of rigorous and independent evaluation of the effectiveness of these initiatives.

- 3.2. RGT has agreed to facilitate the evaluation of industry harm prevention initiatives, using the independent procurement, supervision and quality assurance structures it has in place under the governance of its independent Research Committee (<http://www.responsiblegamblingtrust.org.uk/Research-committee>).
- 3.3. The scheme to be evaluated is the Player Awareness Systems (PAS) initiative which was developed during 2015 by an ABB-led working group that included representatives of Coral, Ladbrokes, Paddy Power, William Hill and machine manufacturers Scientific Gaming and Inspired Gaming (on behalf of independent bookmakers), with the RGT and Gambling Commission as observers.
- 3.4. PAS are a response to ground-breaking December 2014 research by NatCen, funded by RGT, that showed it was possible to distinguish between problem and non-problem gambling behaviour by players using gaming machines in licensed betting offices. All members of the ABB have signed up to the initiative, which is believed to be a world first in retail betting.
- 3.5. Behavioural analytics is the application of an algorithm to customers' historical play data; they build on the NatCen research suggesting that certain "markers of harm" can be helpful in identifying players at risk.
- 3.6. The NatCen research is available on its website (<http://www.responsiblegamblingtrust.org.uk/Research-Publications>). It identified 15 relevant markers of harm, 7 of which the new player awareness systems developed seek to spot, with intervention triggered if at least 3 are associated with a customer. Different Player Awareness Systems use different combinations and numbers of markers of harm.
- 3.7. The goal is to intervene to prevent customers becoming problem gamblers, spotting those who are on a trajectory towards harmful play and intervening with messages which halt and reverse that trend.
- 3.8. Operators are able to use the algorithms to initiate earlier and targeted interactions with any customer identified as displaying behaviours associated with harmful gambling. This is limited to customers who use loyalty cards as this is the only way to associate separate sessions with the same customer.
- 3.9. William Hill, Paddy Power, Ladbrokes and Corals, along with Scientific Gaming and Inspired Gaming on behalf of independent bookmakers, have all developed and are trialling the use of these.
- 3.10. The PAS initiative was launched in December 2015 across all bookmakers in Great Britain – the entire estate of licensed premises, not only those belonging to members of the ABB.
- 3.11. How PAS work, according to the ABB itself:
 - Systems analyse the behaviour of those playing on gaming machines when they are logged in to a customer account
 - Customer behaviour is then assessed against a range of markers associated with problem gambling
 - Alerts (via text, email, or on-screen) can subsequently be sent to players. These include signposting to responsible gambling tools such as setting limits

on machines or self-exclusion, and directing customers towards the National Gambling Helpline / gambleaware.co.uk or to speak to a member of staff. Different PAS systems use different messaging options.

- PAS aim to influence behaviour and in particular to encourage customers to think about how they are gambling. Continued problematic play may result in direct interaction from a member of staff.
- Currently, a variety of analytical algorithms are being used by member companies which will ultimately lead to more effective processes for each operator as best practice and learnings are shared. This evaluation is expected to contribute to this learning.

3.12. A presentation describing PAS is available on the RGT website: http://www.responsiblegamblingtrust.org.uk/user_uploads/customer%20behaviour%20analytics%20abb.pdf

3.13. Each of the operators listed above has developed its own structure and processes for implementing behavioural analytics, this has ensured innovation is maximised and structures are best suited to an operator's specific circumstances. As a result, there are now four separate systems in operation, with six separate implementations, each of which may vary from the others e.g. harm indicators trigger warning communications to customers with differing message content

3.14. A forum has been established to share best practice across operators and a set of minimum standards agreed for *Retail Gaming Player Protection: Data Driven Approach*. These are set out in Appendix D and E

4. Purpose and Scope of the 'Invitation to Tender' (ITT)

4.1. The purpose and scope of this document is to:

- Outline the tendering process and timetable
- Provide applicants with sufficient information to enable them to consider the appropriateness of this invitation and to respond
- Outline the information required in the tender responses
- Set out the administrative arrangements for the receipt of proposals.

4.2. The ABB has asked the RGT to manage and assure the quality of the evaluation process including the procurement of a suitable supplier in order to facilitate a completely independent evaluation. The RGT is being advised in this process by Prof. David Parsons of Leeds Beckett University, who also advises the Gambling Commission on evaluation techniques and impact assessment.

4.3. The evaluation of bids in response to invitations to tender for RGT research, including this evaluation project, will be performed by RGT's Independent Research Oversight Panel, with additional advice from Prof. David Parsons. This Panel advises the Research Committee, which then takes the final decision.

4.4. Once a supplier is appointed to conduct the evaluation, a steering committee including representatives from the ABB working group and RGT will meet at least three times to review the project initiation, interim progress and the draft final report.

- 4.5. The RGT anticipates further demand from the gambling industry for independent evaluation of harm prevention initiatives and may seek to extend the contract awarded in this process for up to three years to cover evaluation or related activity for one or more future projects if the selected supplier is suitable.

5. Work requirements

- 5.1. This tendering exercise relates primarily to the appointment by RGT of an independent evaluator to comparatively review the effectiveness of the early implementation of Player Awareness Systems.
- 5.2. With full estate rollout now achieved, it is appropriate to start to evaluate the success of behavioural analytics in mitigating harmful gambling. With each operator and the machine providers developing their own algorithms, each is also developing its own monitoring and evaluation structures. These should logically feed into an industry wide 'process' evaluation that will identify structures and mechanisms that achieve positive results against expectations and consistent with the agreed standard. The comparative analysis from the evaluation will also help establish best practices that allow operators to fine-tune their systems to support harm minimisation and for maximum benefit to players.
- 5.3. The overall aim of the evaluation is to conduct and report an industry-wide process evaluation looking at the initial effectiveness of harnessing behavioural analytics through the different PAS systems, and early achievements against expectations and the agreed minimum standards. RGT encourages a formative approach to the evaluation so that individual projects can benefit from early evidence and assessment from the independent evaluators. More specific objectives will be to:
- a) Review the comparative effectiveness of the PAS and approaches in harnessing markers of harm in identifying (and communicating to) individuals at risk of problem gambling behaviour.
 - b) Assess the scope and likely appropriateness of PAS monitoring and impact assessment provisions in reviewing future effectiveness, short-term outcomes and longer term impacts on harm minimisation.
 - c) Identify PAS structures and mechanisms that enable or constrain, or are likely to enable or constrain, effective operation and positive results
 - d) Identify better practices across the different systems and the scope for transferability to other operators or systems which can maximise benefits and likely impacts
 - e) Identify also any wider lessons for the further refinement or implementation of PAS which are likely to enhance its effectiveness in the mitigation of harmful gambling.
- 5.4. The focus of the evaluation at this stage is on a comparative assessment of process across the PAS; it is too early to yet evaluate impacts on harm minimisation. However, as part of the process evaluation we will expect evaluators critically to appraise the quality and likely effectiveness of the provisions made in PAS for monitoring and future assessment of impacts (e.g. self-evaluation impact measures, indicators and their measurement). As part of e) above, recommendations for actions to enable a wider impact assessment in future will be sought from this evaluation.

- 5.5. In establishing the information and data that an over-arching industry evaluation will require, it is important that each operator and machine provider can generate comparable information, helping to answer the following questions in particular:
- Does the implementation of behavioural analytics work and help to identify and to reduce harm?
 - What is the comparative effectiveness of the following?
 - Machine originated warnings and alerts
 - SMS delivered warnings and interventions
 - Other warnings and interventionsAre there other factors directly or indirectly affecting the effectiveness of the successful interventions
 - What is the optimal time period and frequency for collecting data/evidence and for collating, undertaking and reviewing interventions?
 - What are the most effective combinations of markers of harm in identifying harmful gambling behaviours?
 - What learnings can be derived from behavioural analytics and applied to anonymous play?
- 5.6. By the end of this evaluation we will have a better understanding of the early effectiveness of the Player Awareness Systems (PAS) and of particular components and approaches, allowing best practice to be identified and adopted across all operators. In other words, a successful outcome of this project is not only an evaluation of the Player Awareness Systems' effectiveness, but a constructive evidence-based contribution to their future development strategy.

6. Methodological Approach

- 6.1. Each of the operators involved in PAS may already be putting in place its own measures and measurement of effectiveness and impact. Each is at a different stage of maturity in its current proposals and plans for self-evaluating their impact.
- 6.2. The successful tendering organisation will need to be able to work across these diverse approaches to be able to consolidate and align evidence from these individual efforts in order to generate a programme wide independent assessment of their effectiveness and impacts.
- 6.3. At all stages, the role of the contracted evaluator will be to provide independent assessment to support RGT's understanding of the effectiveness and emerging impacts across the PAS programme. Liaison and all deliverables will be provided direct to RGT.
- 6.4. RGT expects evaluation proposals to be proportionate and cost-effective. As far as possible we would expect the evaluator to take account of the underpinning research on markers of harm and harm minimisation and to be working with the monitoring and management information and data to be collected by the individual operators. It is likely that some additional evidence will need to be collected for the purposes of

the review of effectiveness and better practice including, through appropriate interviews with operators and suppliers, to comparatively review the different systems, algorithms and implementations, and their monitoring and impact assessment arrangements. Evaluators may also wish to consider how best to illustrate better practices within systems and implementation through, for example, small-scale case studies. It is not expected that the process evaluation will have any need for direct contact, or other engagement, with customers.

- 6.5. Deliverables from the evaluation will include: monthly short e-statements of progress against the project plan; a short interim report to review progress, early findings and issues arising; a draft and final evaluation report including recommendations for further development and improvement of PAS; a stand-alone executive summary of the final report. RGT requires presentations of the reports to be made to the project Steering Group at the interim and final meetings of that group with the presentation to the final meeting of the steering group supported by a PowerPoint presentation which will also be made available as an output. Copyright of all deliverables will be assigned to RGT. The final report and summary should be of publication quality; RGT reserves the right to publish either (or both) the final report and summary version. Timing of the deliverables is set out in 7.1 below.
- 6.6. A significant quantity of anonymised data is available from the machine operators. The evaluator is expected to make provision for analysing this data alongside customer data from the retail operators as part of their overall evaluation.
- 6.7. Subject to further discussions with the participating operators, RGT may invite a single independent and highly secure third-party data storage centre to host the data available to evaluate the systems to reduce the complexity of data sharing arrangements to the multiple operators involved.
- 6.8. Any data provided for use by the successful applicant will remain the property of the operator which provided that data, and will only be provided subject to the terms of an agreed non-disclosure agreement between the successful applicant and each operator.

Tendering organisations are asked to note the proposals for the inputs to the evaluation approach suggested above and outline how they would implement an evaluation strategy incorporating these suggestions. An outline work plan is also needed with proposals and to include key interim milestones such as scheduling of interviews/review with operators, data sharing, and a clear process to deliver the report on time.

Tendering organisations are welcome to suggest fully costed alternative or additional methods that meet the aims and objectives of the evaluation, and need for independent assessment, within the budget and timetable. Where alternative proposals are provided a clear rationale for their inclusion should be set out.

Applicants must provide details of how and when participants to the evaluation and others contributing evidence will be engaged, any supplementary fieldwork methods, and how they would ensure quality of analysis and reporting. Tendering organisations should include information in their proposal about how they would approach any recruitment/sampling needs, target sample sizes for qualitative and quantitative research and modes of data collection as appropriate.

7. Programme Schedule

7.1. The overall timescale for this work will be approximately 6 months with the following indicative key deliverables and milestones:

- Publication of ITT – 1 February 2016
- Final date for receipt of queries (from tenderers) – 10 February 2016
- Final date for return of responses to queries (from RGT) – 15 February 2016
- Inform RGT of intention to bid to receive summary of responses to queries – 16 February 2016
- Last date for receipt of tenders by RGT - 23 February 2016
- Interviews with shortlisted tenderers (if required) – 29 February 2016
- Contract Award – 15 March 2016
- Interim report – 1 June 2016
- Final report – 15 August 2016
- Regular (e.g. monthly) progress reports by email will also be expected and these may be followed up by clarifications if required by the RGT.

8. Tendering Process and Timetable

8.1. On receipt of the proposals, an independent review panel (as set out in 4.3 above) will undertake an assessment of proposals, with a view to selecting an organisation to perform the evaluation. The awarding criteria are outlined in Appendix A.

8.2. Applicants may be required to attend a meeting to clarify any aspect of their proposals.

8.3. Applicants may submit, by no later than 17.00hrs GMT on Wednesday 10th February 2016 any queries that you have relating to this ITT. Please submit such queries by email to PASeval@responsiblegamblingtrust.org.uk.

8.4. If you intend to submit a proposal, you may notify the RGT at this email address by Tuesday 16th February 2016, and all those who have notified us will be provided with an anonymised summary of our answers to questions raised by other tenderers.

8.5. Any queries should clearly reference any appropriate paragraph in the documentation. As far as is reasonably possible, RGT will respond to all reasonable requests for clarification of any aspect of this ITT and supporting documents, if made before the above deadline.

8.6. Proposals must be submitted by 17.00hrs GMT on Monday 23 February 2016 to the following e-mail address PASeval@responsiblegamblingtrust.org.uk. RGT will acknowledge receipt of tenders by email. RGT reserves the right to extend any deadline. Any extension granted will apply to all applicants.

8.7. RGT reserves the right to reject any proposals:

8.7.1. received after the deadline; and/or

8.7.2. which do not comply with the conditions and requirements set out in this ITT.

8.8. All documents and all correspondence relating to the tender must be written in English.

8.9. The tender documentation should be provided in the following format:

- A cover page which details the tendering organisation, principal evaluator and contact details, Section 1: List of contents.
- Section 2: Background including your understanding of the evaluation objectives and work requirements.
- Section 3: A statement of proposed methodology to conduct the evaluation with a justification for proposed methods. This should include a timetable or workplan linked to key activities (e.g., Gantt chart).
- Section 4: A summary of the evaluation team, its relevant experience and expertise and the respective roles and contributions of team members to the evaluation. Summary CV's can also be provided as an annex to the bid.
- Section 5: A statement of the proposed approach to managing and quality assuring the evaluation, to include a brief risk assessment with proposed remedies relating to identified risks, set out as per the pro forma in Appendix B.
- Section 6: A summary of any proprietary intellectual property which will be used to carry out the evaluation.
- Section 7: Costs and charging to provide full disclosure of costs, including number of days required for each task, day rates for different members of the research team, VAT (where applicable) and anticipated expenses, set out as per the pro forma in Appendix C. This section should also include a short statement of how the proposed approach to the evaluation/team will add value to RGT and its requirements.
- Section 8: Contact details for two referees.

9. Intellectual Property

- 9.1. RGT is committed to delivering an independently commissioned research programme that focuses on gambling behaviour and the effectiveness of various treatment, prevention and education strategies in minimising gambling-related harm. This is intended to improve knowledge amongst all those involved in this issue, so the RGT will wish to publish the results of the research. Our requirements below in respect of intellectual property and confidentiality are intended to promote good project management, quality assurance and research integrity, and are not included in order to influence the independent conclusions of this research or its presentation.
- 9.2. The successful researcher will be required to assign all rights in and to any intellectual property created or arising from the work carried out by the researcher (or by the researcher's employees or agents) to RGT.
- 9.3. RGT acknowledges that the researcher may own proprietary software, analytic tools and techniques which may not be assigned to RGT. Where such software, tools or techniques exist and will be used by the researcher in the proposed research, the researcher should provide details in its tender of the methodology, to be used in the proposed research highlighting clearly where such software, tools or techniques will not be assigned to RGT and/or may not be shared with the public.

10. Confidentiality and publicity

- 10.1. The successful researcher will be required to enter into a legally binding agreement with RGT which will contain, inter alia, confidentiality provisions pursuant to which the researcher will be required to:

- 10.1.1. keep confidential all intellectual property and know-how, including confidential commercial and financial information, disclosed by RGT, the ABB and operators to the researcher during the course of the research project;
 - 10.1.2. not disclose to third parties without the express prior written consent of RGT any information arising from the work performed as part of the research project; and
 - 10.1.3. ensure that all proposed publications are submitted to RGT for approval prior to publication with the expectation that approval will be given unless there are reasonable grounds not to do so.
- 10.2. RGT may from time to time require that the successful researcher's employees and/or other person working on the research project enter into a confidentiality agreement with RGT.
 - 10.3. A mutual whistleblowing clause will be included in all contracts to protect against any attempt to influence the outcome of the project. This will allow the supplier to withdraw without penalty if any attempt is made by industry partners to influence unduly their research or conclusions and for RGT to void the contract if it becomes aware of such undue influence.

11. Budget

- 11.1. The evaluation of industry harm prevention projects will be funded by the industry, not from the charitable funds of RGT which is only providing resources for the independent management of the evaluation process. The selected supplier will enter into a contract for delivery directly with the ABB determined by the RGT's recommendation, and the RGT will then supervise the project to maintain its independence.
- 11.2. The evaluation of PAS will have a total overall budget in the range of £40k to £60k plus VAT. Bids priced in excess of this will need to clearly articulate the additional value they will offer to the PAS working group.

12. Eligibility

- 12.1. Applications will be accepted from organisations globally. Those teams located outside Great Britain must ensure they specify, in their proposal, how they will manage communication during the project, and should note that their proposal should include a fee inclusive of expenses.

13. Conditions of Tender

- 13.1. RGT reserves the right to issue the response to any clarification request made by an applicant to all other applicants unless you expressly require it to be kept confidential at the time the request is made and provide a justification which RGT then accepts for such a request e.g. "This would disclose our innovative methodology to other applicants". If RGT does not accept such a request, applicants will be offered the opportunity to withdraw their original request for clarification.
- 13.2. The information contained in this ITT and the supporting documents and in any related written or oral communication is believed to be correct at the time of issue but RGT does not accept any liability for its accuracy, adequacy or completeness and no

warranty is given as such. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of RGT or to any other liability which cannot be excluded at law.

- 13.3. By issuing this ITT, RGT is not bound in any way to enter into any contractual or other arrangement with the applicant or any other party.
- 13.4. It is intended that the remainder of this procurement will take place in accordance with the provisions of this ITT but RGT reserves the right to terminate, amend or vary the tendering process by notice to all tendering organisations in writing. RGT does not accept any liability for any losses caused to the applicant as a result of such termination, amendment or variation.
- 13.5. Applicants will not be entitled to claim from RGT any cost or expenses that they may incur in preparing their proposal irrespective of whether or not their tender is successful.
- 13.6. All information supplied to applicants by RGT, either in writing or orally, must be treated in confidence and not disclosed to any third party (save to your professional advisers) unless the information is already in the public domain.
- 13.7. There must be no publicity by you regarding the project or the future award of any contract unless RGT has given express written consent to the relevant communication.
- 13.8. Applicants must declare any conflicts of interest within their proposal and state how these would be managed. RGT reserves the right to refuse any application based on such conflicts and to terminate any contract if conflicts of interest are found which have not been disclosed or new conflicts of interest arise and satisfactory mitigation of the risk to the credibility of the project is not possible.

14. Appendix A – Awarding Criteria

14.1. Tendering organisations are required to respond to ALL of the criteria below. To assist our evaluation of your tender submission, please ensure you clearly cross-refer your responses in the tender to the criteria.

14.2. Quality Criteria: A maximum score of 75% will be allocated to your response to the award criteria shown in Table 1 below:

Table 1:

Quality Criteria	Weighting
A demonstrated understanding of the background to the evaluation, project and RGT aims and objectives.	2.0
Quality and appropriateness of the evaluation methodology and work plan for meeting all of the requirements set out above.	5.0
Quality and appropriateness of the project management proposals including arrangements for quality assurance through the project. Coverage of the risk register and appropriateness of counter-measures.	2.0
Quality of relevant expertise and experience of the key personnel proposed for this contract in impact evaluation in harm minimisation or similar social contexts.	5.0
Added value that the proposed evaluation approach/team brings to RGT and its needs.	1.0

14.3. Award criteria will be scored using the indicators set out in table 2 below:

Table 2:

Scoring Methodology		
0	Very Poor	No response or partial response and poor evidence provided in support of it. Does not give confidence in the ability of the Bidder to deliver the Contract and/or our requirements are not met in most respects.
1	Weak	Response is supported by a weak standard of evidence in some areas giving rise to concern about the ability of the Bidder to deliver the Contract and/or our requirements are not met in some respects.
2	Satisfactory	Response is satisfactory and supported by a satisfactory standard of evidence. Gives moderate confidence in the ability of the Bidder to deliver the contract, meets the requirements in most respects.
3	Good	Response is comprehensive and supported by a good standard of evidence. Gives a stronger level of confidence in the ability of the Bidder to deliver and meets requirements.
4	Very Good	Response is comprehensive and supported by a very good standard of evidence meeting requirements and may exceed them in some respects. Gives a high level of confidence in the ability of the Bidder to deliver the contract.
5	Exceptional	Response is very comprehensive and supported by a high standard of evidence. Gives very high level of confidence in the ability of the Bidder to deliver the contract. May exceed requirements in several respects.

14.4. The assessed overall score for each question will be calculated by multiplying the quality score received with the weighting for that question, set out above. This will be the total quality score.

- 14.5. Price criteria: 25 marks will be awarded to the lowest priced bid and the remaining bidders will be allocated scores based on their deviation from this figure. Your total costs figure including VAT and expenses in the schedule of charges will be used to score this question.
- 14.6. Overall quality and price scores will be aggregated to provide the final bidding assessment score. This will be used to shortlist bidders. Scores will be moderated across assessors and may be further adjusted after (any) clarification meetings and/or responses. The highest scoring overall bidder after (any) clarification will be the preferred supplier.

15. Appendix B: Risk Register pro forma

Risk/factor	Likelihood and likely effect	Contingency
Brief statement of considerations/factors which might significantly impact on effective/on time delivery ...	Likelihood of risk occurring (EG: High; Moderate or Low); Brief statement of likely effect on delivery/quality.	Brief statement of how you might avoid or minimise likelihood of risk and/or the effects.
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		

NB Please add further rows if necessary.

16. Appendix C – Cost pro forma

16.1. Please complete the pro forma as indicated with sub-totals at A, B and for C (if VAT is to be charged; leave blank if not eligible to charge VAT). 'Activities' should relate to key inputs or stages of activity as set out in your method statement. The staff rates charged should be fixed for the period of the project with any project overheads included or shown separately. The total costs to be invoiced as quoted should be valid for up to 90 days from the closing date for receipt of tenders.

Key inputs (prof days) by/for team member(s) NB. Add name or initials	Team member(s)	Team member(s)	Team member(s)	Total costs (£)
Charging rate (eg per prof. day)				
Project activity/project stage etc ...				
Sub-total 'A' (all staff costs)				
Travel and subsistence				
Project-related consumables				
Other (please specify)				
Sub-total 'B' (all non-staff costs)				
Total costs (A+B)				
VAT at 20% (C)				
Total to be invoiced (A+B+C)				

Retail Gaming Player Protection Data Driven Approach

Best Practice:

Set out below is further detail to ensure consistency of standards

Development of this best practice is an iterative and incremental process and the bookmaking industry will continue to work collaboratively and transparently with all of our stakeholders to establish an industry and world leading approach to responsible gambling.

Algorithm and its data

17.1. *Number of markers / data inputs*

- Many of the markers are not fully detailed to outline what behaviour actually constitutes a potential problem for a player
- Given this and the inability to track data on some markers then not all of them are expected to be pursued
- A minimum of 3 markers / data points should be included to ensure a degree of validity in the outcome
- Not all markers correlate to a single data point which is available in existing data sets
- For player protection, logged-in session data will be used. The industry are working together to establish a common set of rules to extend session data to any pre log-in or post log-in player activity¹.
- Only data from gaming play in the retail environment is included in the algorithm

17.2. *Regularity Reporting*

- Reporting should be done internally by each operator as a minimum on a bi-weekly basis to include triggering the relevant action to applicable players and track player behaviour changes (including players moving between risk categories)
- The algorithm output should provide a daily view of player scoring (*NB: activity on individual reports not currently required daily*)

17.3. *Other items*

- Player behaviour “route” should be tracked (i.e. moving from one classification to another or appearing immediately in one classification) to ensure clarity of their position and messaging

Communication to Players

17.4. *Method*

- Communications should be triggered by algorithm output

1.1. _____

¹ In terms of session data, a proportion of players only log into their account (mobile/email/card) on reaching £50+ play, this means that up to 20% of play is being missed from a session data; statements remain as play directly linked to account or card *only*

- A trial should take place in advance of broad rollout to assess both scoring and communication approach
- For At Risk players, a variety of methods to communicate with players should be used – e.g. SMS, Pop ups, email
- For High Risk players an “in-person” interaction at the LBO level is preferred

17.5. Approach by classification

- Communication messages to the At Risk players should be standardised where possible with escalated degree of directness over time (and appearance on At Risk listing)
- Each High Risk interaction should be carried out in a personalised / case-by-case way to an individual player based on all the information to hand

Analysis and ongoing process

- Overall approach, process and player behaviour should be reviewed on regular, on-going basis
- Player behaviour and status, pre and post communication should be analysed to understand whether any impact is achieved
- All the above to feed back into review of algorithm and communications
- Operators must be ready to share the model, practices and learnings from algorithms & interactions with the analytics group, SENET, Gambling Commission and others as deemed relevant and valuable

18. Appendix E – Minimum Standards 2

Retail Gaming Player Protection Data Driven Approach

With the evolution of the recent DCMS driven changes to Retail Gaming the bookmaking industry is now in possession of more data in relation to customer play and behaviour. As more data is gathered and matures the industry and operators within it need to ensure they have sufficient data algorithms, communications plans and process of ongoing analysis & review to ensure a robust approach over time.

Put simply, data can be harnessed to help identify at risk and problem gamblers with contact designed to change behaviour then initiated through messaging and responsible gambling interactions.

To aid this, the operators have agreed a set of objectives under which they will develop their individual approaches with the aim of moving towards a more standardised approach over time (informed by research).

Objectives:

- i. To achieve a minimum set of industry standards
- ii. To share best practice across operators

Different systems and structures mean that it is more effective to allow operators to tailor development to their own unique processes under the umbrella of these objectives. However is possible to have a more detailed set of principles to ensure the objectives are met.

Principles:

- ✓ To utilise a selection of the existing markers of harm (from the NatGen research)
- ✓ Independent review of each operators algorithm and markers of harm utilised
- ✓ Identified player list to be analysed both before and after communications take place
- ✓ Operators will ensure a minimum of bi-weekly internal reviews of player lists
- ✓ Each operator to review the effectiveness of different communication methods
- ✓ In the case of those at higher risk, interactions must be tailored to the individual customer
- ✓ Provide for a range of interactions suitable for different levels of severity of harm identified
- ✓ Operators will share the workings of their models with the Gambling Commission