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# Our strategy for the next three years

The corporate strategy highlights the most important work we intend to deliver over the next three years.

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## Foreword

This strategy highlights the most important work we intend to deliver over the next three years.

The strategy is driven by our statutory duties and has been shaped by our most recent [assessment of current risks to gambling consumers and market integrity](#)

[\(/policy/national-strategic-assessment-2020\)](#).

It has also been shaped by our current work running the competition to award the next Licence for The National Lottery and ensuring the continuation of the current good performance. It takes account of the recommendations included in recent reports on gambling regulation undertaken by the National Audit Office, Public Accounts Committee and House of Lords Select Committee. It builds on a recent strategic review to develop and restructure our organisation to ensure that we have the right skills, experience and resources to regulate effectively in future. Through this work we can ensure the Gambling Commission is prepared to meet the challenges ahead.

A well-regulated gambling market, in which consumers have confidence that they will be well treated and protected, is the only sustainable basis for allowing businesses to provide facilities for gambling.

We understand that the gambling businesses we licence will need to adapt and respond to the demands of their consumers. But in evolving products and services, consumer protection must be at the forefront of businesses' minds and plans.

Alongside regulating the wider gambling market, we have a strong track record of safeguarding The National Lottery and ensuring that it is run with integrity, protects players, and maximises contributions to good causes. We want to build on this success by running a fair and transparent competition for the next National Lottery Licence. That Licence will provide more opportunities for innovation and creativity while protecting the unique status of The National Lottery.

Given the innovative and fast-moving nature of the gambling industry, and our intention to help the National Lottery go from strength to strength, our regulatory approach cannot stand still. We need to adapt to live up to the international reputation we have earned as an effective regulator. I am very proud of the progress we have made over the last three years. This strategy will build on the foundations we have set in the months and years ahead.

Dr William Moyes  
Chairman

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## Introduction

This strategy sets out the high level priority work we will deliver over the next three years. It will ensure we remain flexible enough to regulate an increasingly fast-changing gambling industry. It will also help us to deliver a high quality and

effective competition for the next National Lottery Licence while maintaining the current good performance of the existing Licence.

The strategy should be read in conjunction with our [Business Plan \(/about-us/guide/business-plan-april-2021-to-march-2022\)](#), published annually, which explains how we plan to deliver our work each year. We will begin to implement both the strategy and the latest Business Plan from April 2021.

We will build on the achievements and maintain the ambition of our first three-year corporate strategy. We know that our resources need to be carefully considered and planned so we can continue to deploy them effectively at pace to address emerging risks and issues. We will provide clearer and more timely evidence about the impact of our work to better demonstrate what we have achieved.

This strategy takes account of the fact that the [Department of Digital, Culture, Media and Sport \(DCMS\) \(opens in a new tab\)](#) (<https://www.gov.uk/government/organisations/department-for-digital-culture-media-sport>) has recently launched a review of the Gambling Act, which includes consideration of our power and resources to regulate. We expect the review to conclude partway through the life of this strategy, so we must balance the need to make progress while remaining flexible to adapt to the outcomes of that review.

Our strategic objectives are specifically linked to our duties under the Gambling Act and the National Lottery Act. Our determination to raise standards in the gambling market cuts across all our strategic objectives.

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## A well-regulated gambling market

Gambling remains a [popular and mainstream pastime in Great Britain](#) (</strategy/national-strategic-assessment-2020/the-person-gambling-what-do-we-know>).

The British gambling market has experienced a period of growth driven by the increase in online gambling (including the use of mobile devices). Our evidence shows that while headline gambling participation is not increasing, the ways people gamble are changing.

Many people enjoy gambling. But for some, gambling poses serious risks and can cause devastating harm both directly and indirectly.

Our regulation must balance consumer choice and the enjoyment gambling can bring against the risks gambling presents to some consumers and wider society. It is

not an easy balance. Changes in consumer behaviour and emerging technology create new risks and opportunities for regulation to keep pace with.

Public trust and confidence in gambling has declined over recent years. There is significant public concern about the visibility of gambling and the impact this may have on children, young people and others who might be vulnerable. Although gambling is recognised as a legitimate leisure activity, it must be licensed and regulated to ensure consumers and the wider public are protected.

As the gambling regulator, our duties are to aim to permit gambling, provided we are satisfied it is reasonably consistent with the licensing objectives to:

- prevent gambling from being a source of crime or disorder
- ensure that gambling is conducted in a fair and open way
- protect children and vulnerable people from being harmed by gambling.

The Licensing objectives do not belong to us alone. They are the basis of the regulatory framework for gambling, and so they must belong to the gambling industry as well.

## **The National Lottery**

We are also responsible for awarding licences to run and for regulating The National Lottery. This includes running the competition to hold the Fourth National Lottery Licence and ensuring a smooth transition between the Third and Fourth Licences.

We ensure The National Lottery is run in a way that ensures:

- propriety
- participants' interests are protected (and subject to those two duties)
- proceeds from The National Lottery are as great as possible.

Our strategy reflects these objectives and duties, along with our statutory duty to provide advice to government.

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## **Our mission**

Our mission is to make gambling fairer and safer. We do that by licensing and regulating in the public interest and providing advice and guidance.

## **Our vision**

We want a fair and safe gambling market where all consumers and the interests of the wider public are protected.

## **Our aspirations for consumers**

We want consumers to be:

- supported to gamble safely and protected from harm
- empowered to make informed choices about gambling
- fully informed of, and able to make use of, their rights
- free to enjoy gambling and to feel confident that they will be treated fairly
- aware of the risks and clear about when and how to seek help or redress
- able to differentiate between gambling businesses in a competitive market on the basis of customer care and values.

## **Our aspirations for licence holders**

We expect licenced businesses, those who lead them and who hold personal licences to be able to demonstrate through their actions and the outcomes they deliver that they:

- prioritise a culture of compliance and commitment to doing the right thing for consumers that resonates at all levels of the business
- work to continuously raise standards and treat consumers fairly
- work collaboratively with each other to reduce the risk of harm from gambling
- invest in technology to identify risks and intervene effectively to prevent crime and consumer harm
- innovate and evaluate what works to make gambling products and services safer by design
- actively identify and appropriately manage risk and emerging risk.

## **Our approach to licensing, regulating and advising**

We will:

- continue to be independent and evidence-led
- take a targeted and innovative approach to regulating, consistent with our statutory objectives
- intervene and use our powers proportionately to achieve our goal of making gambling fairer and safer

- build effective partnerships internationally, as well as locally, with key regulators and stakeholders.
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## Our strategic objectives for the next three years

Our [National Strategic Assessment](/strategy/national-strategic-assessment-2020) (/strategy/national-strategic-assessment-2020) identifies the key issues we face in making gambling fairer, safer and crime-free. The assessment is based on our insight, research, data and casework. Its findings in part shape this Corporate Strategy, which is also set in the context of our work regulating The National Lottery and running the competition to award the fourth National Lottery Licence.

Consumers are at the heart of our work. An understanding of all stages of the gambling consumer journey and the experiences of different consumers will underpin our approach to evolving regulation. We will continue to work with co-regulators, the gambling industry, regulatory partners, consumer representatives and stakeholder groups, academia, our advisory groups and with government. We will continue to ensure that we take account of different consumer voices directly, for example, via our Lived Experience Advisory Panel and through consumer panels and research.

Our strategic objectives for the next three years are:

### ⊕ Strategic Objective 1

Protecting children and vulnerable people from being harmed by gambling

[View details and priorities](#)

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### ⊕ Strategic Objective 2

A fairer market and more informed consumers

[View details and priorities](#)

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### ⊕ Strategic Objective 3

Keeping crime out of gambling

[View details and priorities](#)

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## ⊕ **Strategic Objective 4**

Optimise returns to good causes from The National Lottery

[View details and priorities](#)

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## ⊕ **Strategic Objective 5**

Improving gambling regulation

[View details and priorities](#)

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### STRATEGIC OBJECTIVE 1

## **1. Protecting children and vulnerable people from being harmed by gambling**

Gambling related harm is a public health issue requiring a coordinated response. It includes harm to an individual but also the wider impact it can have on family life, access to public services and costs to the community and economy. Our role is to ensure licence holders are acting to minimise the risk of harm.

Rates of problem gambling in Britain, although stable for many years, are not reducing. More work is needed to assess the scale of gambling related harm and understand what works best to reduce it. Given the pace at which the gambling industry changes, it is vital for us to understand the factors that influence gambling behaviour so we can focus on preventing harm before it occurs.

We will take a precautionary approach to interpreting available evidence and approaching new developments where appropriate. Where evidence is mixed or inconclusive, we will not restrict our discretion by requiring conclusive proof that something is unsafe before taking appropriate action to prevent harm.

## **Improving standards of conduct and competence by licence holders through licensing, compliance, and enforcement activity**

Issuing licences to applicants suitable to carry out a licensed activity.

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Regulating to reduce the risk of gambling related harm, including thematic compliance work to examine how risks are being managed.

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Working to ensure that a culture of compliance permeates licensed businesses.

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Working to ensure licence holders work collaboratively with each other to develop innovative ways to reduce harm and protect consumers.

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## **Evolving Licence Conditions and Codes of Practice, taking account of all stages of the consumer journey**

Identifying where developments in gambling products or services might pose a risk of harm and responding at pace where required.

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Ensuring that our licence conditions, codes of practice and related regulations remain relevant, fit for purpose and are mitigating the risk of harm at all stages of the consumer journey.

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Horizon scanning and identifying opportunities to raise standards to reduce the risk of harm.

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## **Continuing to improve understanding and build a stronger evidence base for policy making**

Gathering evidence about how people gamble and factors that affect the way they play.

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Developing our research methods to ensure we continue to collect high quality evidence and data.

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Working with regulators, partners, advisory groups and others, and listening to consumer experience to improve how we collect evidence on the impact gambling can have.

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## **Focussing our efforts on preventative and regulatory action to support the implementation of the National Strategy to Reduce**

## **Gambling Harms**

Working with partners to help identify and implement the right mix of controls to be applied by licence holders designed to prevent harm for all consumers and vulnerable groups or individuals.

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Collaborating with stakeholders and partners to develop evidence about the effectiveness of activities to reduce gambling related harm, and taking action on that evidence.

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Encouraging stakeholders, partners and others to embed the principles of the National Strategy within their own work.

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### STRATEGIC OBJECTIVE 2

## **2. A fairer market and more informed consumers**

Public perception that gambling is fair and can be trusted has fallen from 49% in 2008 to 29% in 2020, although 47% of British adults report having gambled in the last four weeks. Over the course of this strategy we will work to understand what this drop in perceived trust means, how it affects gambling behaviours and how regulation can be used to deliver better outcomes for consumers.

Consumer complaints can be a good indicator of trust in a licence holder's products and services. An effective complaints and feedback process can help to improve consumer confidence in the industry.

Some consumers struggle to understand 'industry jargon' and associated mathematical concepts. This is reflected in customer complaints that show a lack of consumer understanding about how products and services work. More innovative thinking and trialling of different ways of communicating key gambling concepts will help consumers to make informed choices about their play. We expect to see licensees make more progress in this area to ensure gambling is as fair and open as possible.

### **Ensuring the fairness of products**

Making sure new products meet our technical standards and have had appropriate and sufficient testing before they are released to market.

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Confirming that test houses meet revised accreditation standards that ensure the fairness of products entering the market.

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## **Improving information to consumers**

Working to ensure licence holders present product information in a way that is clear and easily understood to enable informed consumer choice.

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Working to ensure that general information such as terms and conditions is accessible and easy to understand.

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Engaging with research aimed at improving understanding of player experience of gambling products.

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## **Understanding consumer concerns**

Improving our capacity to identify consumer issues and act upon them quickly.

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Ensuring licence holders have suitable complaints procedures, in line with our guidance, and that these are accessible to consumers.

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## **Publishing information about licence holders**

Considering what additional information would be useful to and usable by gambling consumers and the wider public.

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Exploring how and whether publishing information could provide licence holders with additional reputational incentives to raise standards.

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### STRATEGIC OBJECTIVE 3

## **3. Keeping crime out of gambling**

Gambling is a legitimate activity, but it can also present opportunities for crime. The UK's regulatory framework is considered world leading, particularly in relation to working with partner agencies to detect and prevent crime. Over the course of this strategy, we will continue to work with partners and target our activities to contribute to a reduction in crime associated with gambling. We will continue to hold gambling licence holders to account to ensure they are meeting their responsibilities to keep crime out of gambling.

As we raise standards across the regulated market it is important that we are resourced and equipped to tackle illegal gambling and risks relating to betting

integrity. Gambling operates in an increasingly global market. Manipulation of betting events can involve serious organised crime networks operating at national and international levels. Our ability to collect, analyse and share intelligence with other regulators and agencies, and work collaboratively with other jurisdictions, continues to be key to safeguarding British consumers' interests.

## **Tackling illegal providers who are offering unlicensed gambling to consumers in Great Britain**

Collecting evidence to inform and influence our disruption and enforcement approach to the illegal gambling market.

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Building relationships domestically and internationally to share experiences and knowledge of the illegal gambling market to help reduce risks.

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## **Preventing money laundering and terrorist financing**

Continuing to apply national and international best practice through the effective implementation of the Money Laundering Regulations, Proceeds of Crime Act and associated legislation.

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Updating our Money Laundering and Terrorist Financing Risk Assessment to reflect the current risks, in keeping with our risk-based approach and publishing updated guidance materials as required.

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Continuing to work with partner agencies to share information and intelligence across the global gambling market.

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Ensuring our licensing processes remain robust and we are equipped to manage the risks associated with the increasing complexity of corporate structures.

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## **Managing risks to betting integrity and event manipulation**

Continuing to work closely with sport bodies and law-enforcement partners to achieve regulatory and criminal outcomes relating to betting integrity issues.

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Continuing to support the Sport and Sports Betting Integrity plan.

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Continuing to develop our relationships with overseas jurisdictions and international bodies to support effective collaboration and information sharing.

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## 4. Optimise returns to good causes from The National Lottery

The National Lottery is one of the world's largest lotteries. Since launching in 1994, National Lottery players have collectively raised more than £42 billion for 625,000 good causes across the UK, transforming lives and contributing to the arts, sports and heritage sectors and to communities.

The current (Third) Licence to run the National Lottery is due to expire in 2023. In August 2020, we launched a competition to award the Fourth Licence. This Fourth Licence will build on the success of the previous licence by creating a framework that maximises opportunities for players and good causes to benefit from innovation and technology, while ensuring the licence is well regulated and protecting The National Lottery's unique status.

Transitioning The National Lottery smoothly and successfully from one Licence period to the next is a key focus for us.

The core principles for transition are:

- to ensure the orderly handover and continuity of The National Lottery
- to achieve minimum disruption to participants, good causes contribution, the quality of the operation and the values, purpose and reputation of The National Lottery.

### **Maintaining performance for the remaining term of the Third Licence**

Ensuring the current Licence holder continues to deliver against the requirements of the current Licence, particularly with respect to ensuring the National Lottery is operated with all due propriety and that the interests of participants are protected.

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Ensuring the current Licence holder continues to deliver substantial returns to good causes during the remainder of the term.

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### **The Fourth Licence competition**

Holding a robust and fair competition for the Fourth Licence that ensures the Applicant that delivers the highest credible and deliverable good causes contribution for the Fourth Licence, is successful, whilst first ensuring the Commission's Statutory Duties of propriety and protecting participants' interests are met.

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Ensuring the conditions for the Fourth Licence build on the successes of the Third Licence, placing responsibility for performance and flexibility to maximise returns to

good causes on the Licensee, while ensuring high standards of propriety and a strong focus on player protection.

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Growing the value of the National Lottery as a public asset, enhancing and protecting its brand, and ensuring that the Fourth Licence holder fosters strong relationships with distributors of National Lottery funding to strengthen the link between the brand, its players and good causes.

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## **Transition between licences**

Ensuring we oversee a successful transition from the Third Licence to the Fourth Licence operation whilst delivering our statutory duties and protecting the reputation of The National Lottery.

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Developing a transition management framework that enables active management of risk and delivery performance to support a successful transition.

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Defining, implementing and operationalising an appropriate regulatory model ahead of the Fourth Licence start date.

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## STRATEGIC OBJECTIVE 5

# **5. Improving gambling regulation**

We are a risk-based, evidence-led and outcomes-focused regulator.

We have developed and restructured our organisation to ensure that we have the right foundations to regulate effectively now and in future.

Given the innovative and fast-moving nature of the industry we regulate, our regulatory approach cannot stand still. Over the course of this strategy we will continue to adapt to live up to the international reputation we have earned as an effective gambling regulator. Our ongoing response to the COVID-19 pandemic has demonstrated how quickly we must act at times to continue to deliver our core functions and also to support our staff. We will continue to develop our people and approaches and continue to consider our resources to ensure we are a flexible and agile regulator with professional and engaged staff.

We intend to focus on the following areas as we strive to improve gambling regulation:

# **The review of the Gambling Act, and the recommendations from the National Audit Office, Public Accounts Committee and House of Lords Select Committee**

Supporting government and providing Advice on the review of the Gambling Act.

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Providing authoritative data and insights on gambling and gambling regulation.

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Building on the work we are already doing implementing recommendations from the NAO, PAC and House of Lords Select Committee.

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## **Developing our people**

Investing in developing the skills of our people to ensure we have the capabilities needed for the future.

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Ensuring we have a diverse and effective workplace, reflective of wider society.

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Continuing to build our organisational culture to help us remain effective and efficient.

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## **Managing our resources efficiently**

Providing effective and efficient financial management and control.

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Considering how we can introduce greater flexibility within our resources to adapt to changing circumstances.

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Remaining transparent about how our resources are used.

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## **Evaluating the impact of our work**

Developing impact metrics to communicate progress against our priority work areas.

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Developing a framework to help us evaluate the impact that our individual projects or interventions have delivered.

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Working with our partners in the National Strategy to Reduce Gambling Harm and others to share data and learning from evaluations to further the gambling evidence base.

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## **Harnessing technology**

Developing our systems and process to ensure we remain an effective regulator, including making best use of external data sources.

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Seeking to automate systems and processes where possible so that we can invest more resources in frontline work.

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Identifying and investing in emerging technologies that can help us to regulate more efficiently and effectively.