Customer Journeys to Tools and Support: Scoping Paper September 2020

1. Background

In November 2019 leading gambling companies announced a package of Safer Gambling Commitments to address the harm gambling can cause to customers and young people. The package has five core commitments to: Prevent underage gambling and protect young people; Increase support for treatment of gambling harm; Strengthen and expand codes of practice for advertising and marketing; Protect and empower our customers and; Promote a culture of safer gambling.

As part of the commitment to protect and empower customers, operators agreed an action to "make safer gambling tools and customer support more visible and accessible, both on and offline, to help customers stay in control".

GamCare's Strategy for 2018-2021 states that, by the end of March 2021, the charity will have tripled the number of callers to the National Gambling Helpline and the number of clients receiving interventions across its network.

GamCare and the Betting and Gaming Council (BGC) have agreed to collaborate and scope an initial approach for operators to meet the above aims which will, in its first phase, concentrate on the online sector.

2. Purpose of this review

This paper outlines the scope of a project to assess the current standards of customer journeys into tools and support across operators, identify best practice and agree to establish these as principles to be adopted across members. It will have a particular focus on *information and messaging* but will touch on other areas such as referral systems (e.g. 'warm transfers' from operator customer service centres into the National Gambling Helpline).

The purpose of this review is to develop a code of practice and/or guidance on communicating safer gambling information, including signposting to tools, help and support, with an emphasis on ensuring that operators provide customers with a clear and consistent safer gambling online experience.

The code will be capable of adoption under the BGC with the potential for future adoption as an ordinary code provision within the LCCP and GamCare's Safer Gambling Standard voluntary accreditation scheme.

The new code will seek to ensure that customers are able to access safer gambling tools and support more quickly, effectively and consistently.

3. Customer journey: definition

'Customer journeys' describe the path of sequential steps and interactions that a customer goes through with a company, product and/or service[1]. For this project, the following stages of the online customer journey are being considered:

- Signup
- Deposit and withdrawal
- Play or bet
- Set a control
- Self-exclude

---

[1] https://transformation.ai/customer-journey-definition/

At each of these points in the journey, this project will consider what 'access' to safer gambling information the customer has when on desktop, pad and mobile. The following stages of the online customer journey are excluded from review in this project:

- Advertising, marketing, and social media – this is being addressed through other Safer Gambling Commitments. However, this project will ensure alignment with relevant marketing campaigns and advertising codes.
- Play (within game environment) – information displayed within games is not always within the control of gambling operators and is thus excluded from the scope.

During the customer journey, operators have the opportunity to communicate with customers in several ways including through: customer interactions, general website content, welcome emails, in-app/online pop-ups, self-exclusion administration and customer support calls. The project will consider the appropriateness of the communication method at different stages in the customer journey.

4. Current practice and regulatory requirements

The Gambling Commission's Licence Conditions and Codes of Practice (LCCP) (July 2020) state that:

> **Social responsibility code provision 3.3.1**
> **Responsible gambling information**
> **All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences**
>
> 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
> 2 The information must cover:
>   a any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
>   b timers or other forms of reminders or 'reality checks' where available
>   c self-exclusion options
>   d information about the availability of further help or advice.
> 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
> 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Current practice across the gambling sector in this area is extremely varied, leading to highly inconsistent outcomes.

To give an example, there is no agreed definition of what 'readily available' means (3.3.1 above), and therefore no consistent location for 'Responsible gambling information' on gambling industry websites. As a result, on some sites, information for those wishing to protect themselves from harm is prominently displayed (e.g. in rotating website banners), whereas on others it is not. Information is also displayed in different places, using a range of logos, and the 'click through' may take the user to different pages. The responsible/safer gambling pages are not always easy to find and contain variable context and information about tools and support.

5. Expected deliverables

Three main deliverables are proposed:

1. Background research and scoping
2. Development of a code of practice / guidance on communicating safer gambling information to customers online
3. Evaluate code effectiveness and embed within existing channels

5.1 Background research and scoping

This deliverable will include:

- Review current practice and establish baseline of what exists, including customer touchpoints and what information is provided at each. Document minimum requirements, good and poor practice examples. This includes identifying operators who currently refer well into GamCare's services e.g. reviewing baseline data from Google Analytics.
- Identify what might be initial quick wins, and what issues might slow adoption of good practice down (e.g. changing websites).
- Consideration of apps and mobile versions as well as desktop sites.
- Review of logo usage across operator sites.
- Review of screening methodologies and tools on operator sites.
- Review evidence regarding good practice regarding uptake. Include referral pathways from other related sectors e.g. alcohol.
- Map relevant stakeholders and convene together to ensure customer journeys reflect the real contexts of all sectors.

5.2 Development of code

This deliverable will include:

- Agree consistent information and messaging, including referral / signposting destinations, locations for messaging, operator touchpoints for interaction.
- Agree a consistent screening process for those wishing to identify the presence of gambling harms, either as a customer or customer service representative.
- Establish a code of practice / guidance, comprised of the guidance identified.

5.3 Evaluate code effectiveness and embed within existing channels

This deliverable will include:

- Evaluate the effectiveness of the code, including monitoring uptake, changes in customer behaviour and awareness, click-through activity, calls to services.
- If evaluation shows a positive impact, seek to embed the code through relevant channels – Safer Gambling Standard, BGC Code of Conduct, Gambling Commission recommendations / LCCP.
- Agree next steps, including formation of a project working group for equivalent land-based sector code or annual review groups.

6. Indicative timeline

Phase	Dates
Phase 1: Background research and scoping Review current practice Establish evidence base Refine scope	**April 2020 – August 2020**
Phase 2: Development of code Form working group Conduct additional research as required Develop code Consult and refine code Publish code	**September 2020 – January 2021**
Phase 3: Evaluate code effectiveness and embed within existing channels Evaluate effectiveness of code uptake and consider next steps Establish means of embedding (e.g. through which channels)	**January 2021 – April 2021**

7. Key evidence and research

- "In control: How to support safer gambling using a behaviour change approach" (Revealing Reality report 2019) – stated that operators should dedicate more of their budgets to creative ways of sharing a safer gambling message.
- GamCare Annual Statistics 2014/15 – ABB implementation of shop-wide presentation of National Gambling Helpline number and subsequent spike in calls.
- "Communicating alcohol and health-related information" (Portman Group 2017) – Evidence from other sectors showing good practice.