



**PERSONALISE, PROTECT  
AND PLAY: OPTIMISING  
THE GAMING EXPERIENCE  
TO KEEP PLAYERS SAFE**

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The regulatory and industry landscape is continually evolving, and gaming companies must be agile in their approach to adapt to new measures while prioritising player protection. By embracing data, fostering readiness, and partnering with trusted experts, gaming companies can lead the way in responsible gambling and customer-centric experiences. Act now, to ensure you can thrive whilst protecting the welfare of players.





# Section 1:

## What's happening in the market?

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### **The gaming market has changed**

44% of UK adults enjoy some form of wagered gaming, such as playing the National Lottery, betting, or online games such as bingo and poker, delivered by operators across a span of channels including mobile and online.

Research shows that the number of people gambling online is the same as in-person players for the first time. Just five years ago, there were half as many online players as in-person participants.

Online gameplay has made betting more fun and convenient for a wide range of players, who get to enjoy safe wagered play and the social aspect of games like bingo in their own homes. Many willingly share data which companies use to offer a more personalised experience, such as game recommendations or special in-play offers.

Online and mobile gaming has introduced new challenges to the sector too. Supply chains have become more complex, with everything from data protection and management to authentication and detection of fraud to consider.



## Protecting players has never been more important

Easier access to gaming brings a greater risk of problem play, which is something today's consumers are much more aware of. In 2020, 47% of UK players reported being aware of measures to help those who exceed their limits, such as self-exclusion. The figure was 12% higher than reported in 2015, showing that consumers are more aware of measures they can take to stay in control. However, public perception has declined over the last decade, with just 29% of people believing gambling is fair and can be trusted and 73% viewing it as "dangerous for family life".

But with an estimated 2.2 million at-risk or problem gamers in the UK, or around 4.5% of players, you need to work continually to prevent customers crossing the line from fun to addiction and financial distress.

Protecting at-risk or problem gamers in the online world also requires a different approach, with the need for more stringent identity verification and more frequent player monitoring to prevent gamers exceeding safe limits across multiple accounts.

Still, 68% of people believe everyone should have the right to gamble how they want – leaving operators and regulators to find the balance between their duty of care to identify and protect vulnerable customers.



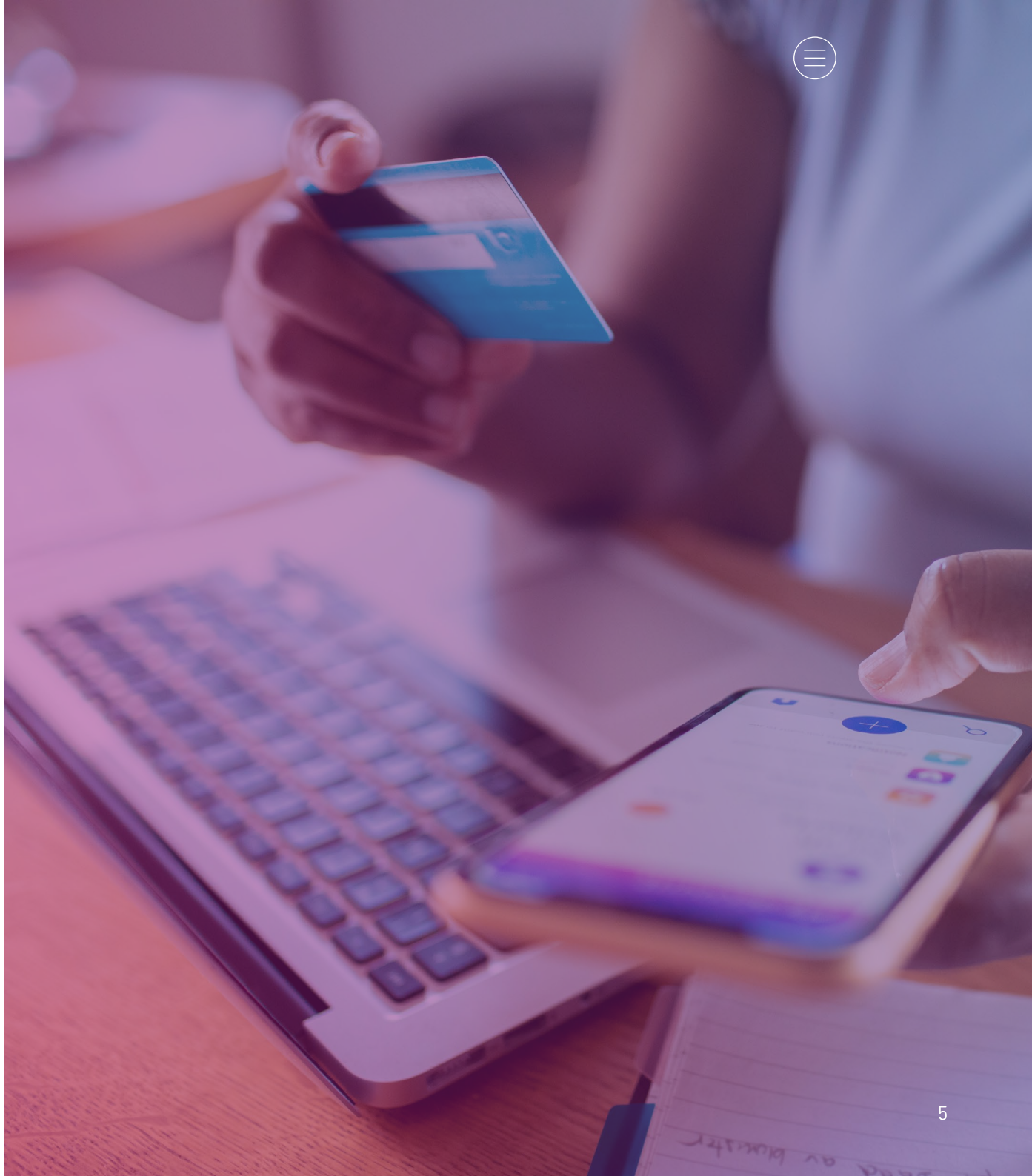


## What's changing now?

The **Government's 2023 whitepaper** on gaming calls for further reforms to key areas such as identity verification, affordability and transparency of spend. The proposals focus particularly on the online gaming space – something that was in its infancy when the Gambling Act 2005 was drafted.

None of the proposed changes will be implemented immediately. Operators and the wider industry network, including Experian, are working with the Gambling Commission and Government to understand the measures that maintain gaming as an enjoyable pastime while keeping players safe in the era of digital gaming.

In July 2023 the Gambling Commission launched its consultation with the market on its recommendations to improve the checks and balances made by operators to safeguard players. This consultation coincides with confirmation from the Information Commissioner's Office (ICO) that using personal financial data retained by UK credit reference agencies to understand an individual's financial health meets the requirements of GDPR. This clarification means gaming organisations can compliantly understand customer financial data and use that information to build a more accurate view of affordability.





## What are the key recommendations?

The whitepaper proposes new measures and impact assessments against the six themes in the original government review in 2020.

Suggested measures include an operator levy, stake limits, online gaming rules and giving the Gambling Commission greater powers to stop unregulated operators.

A key suggestion is a frictionless player protection check for a small group of gamblers to ensure they are not playing beyond their means:

**“The Commission will consult on two levels of background checks: for moderate spend, seen at £125 net loss within a month or £500 within a year, a Basic Assessment using public data as indicators of financial stress such as County Court Judgments and bankruptcy notices; an Enhanced Assessment using credit and summarised current account income information for higher levels of spend which may indicate harmful binge gambling or sustained unaffordable losses of £1,000 net loss within 24 hours or £2,000 within 90 days.”**

These player protection checks will require affordability to be verified using personal financial data such as income and indebtedness. The Government's whitepaper also suggests that at-risk or problem players may also need to evidence their affordability with more detailed information such as proof of employment and bank statements.

By having access to this data, gaming companies can take a “light-touch” but informed approach to assess financial vulnerability and risk personalised to each individual player.





# Section 2:

## Being ready for the changes in the market

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### Preparing for change

While the proposed changes will undoubtedly change the industry, it's likely your business will need to invest time and resources to adapt – with both immediate changes and future shifts in mind.

The earlier you begin preparing, the easier it will be to protect players, ensure you can offer frictionless gaming experiences and continue operating as a sustainable and responsible business.

You will need to consider a range of issues, including:



**Getting an accurate view** of customer's financial wellbeing and the extent of player behaviour and emerging risks, making gaming frictionless while monitoring and safeguarding vulnerable customers



**How to support and adhere to the highest standards** of regulatory compliance and transparency including continuing to protect against money laundering in the new gaming landscape



**Learning and bringing best practices** from other industries, such as the sharing of credit information and newer data sources such as digital payslips and Open Banking, into the gaming space



## Building the business case

The first step for operators is to assess the size of the problem faced and what the business needs to do to move towards a higher standard of player protection.

The scale and scope of the changes will vary significantly between operators, as will the size of the challenge that needs to be addressed. Balancing implementation costs with the value of improving player protection is an important consideration.

Every operator understands why making the investment is essential to the business as any issues with compliance can lead to significant fines and an impact on your organisation's reputation.

For example, performing retrospective analysis of your customers with a Credit Reference Agency (CRA) can help reinforce the capabilities CRA data offers in understanding the extent of vulnerability amongst your players.

The 2023 whitepaper on gaming estimates the cost in Gross Gambling Yield (combined revenue from all gambling activity) will fall between 3.3% (£329m) and 8.2% (£812m) as a result of the proposed changes. To remain competitive, gaming organisations must balance compliance with seamless, friction-free customer onboarding of the right customers. Understand how best to deploy CRA data in association with newer data sources such as Open Banking is the key to your success.





## Creating the roadmap for change

With your commitment to responsible and sustainable gaming, now is the time to innovate and build the framework for the future industry ecosystem.

At the heart of this is data. Operators will need more personalised data. This may require additional permissions to capture data from players, as well as investment in better use of the information you're already collecting.

Information such as name, address and date of birth in association with credit data can help provide a consolidated view of your customers, better prevent underage play, fraud and limit problem gambling. Establishing standards, practices and processes around data capture and processing now, will help front runners to comply quickly with minimal customer disruption. The right foundation will make it easy for businesses to stay compliant and use quality data to create a more holistic and accurate view of players.

Backed by the solid data foundation we believe readiness hinges on three key actions:

1

**Taking a Single Customer View (SCV) approach to data capture, monitoring and analysis to understand the extent of player behaviour**

2

**A more prescriptive and risk-based approach to better understand if gaming is likely to cause financial harm**

3

**Adhering to the highest standard of compliance in the capture, maintenance and use of data with a focus on player protection**



## How Experian can help

Once the true scale of the changes become clear, you will need a cost-effective strategy to implement them. But it's not enough to simply recognise that changes must be made. Partnering with an expert that can help execute them should be a key priority.

It can be hard to execute significant changes at scale and gain secure access to sensitive customer information. Enlisting the services of a trusted partner like Experian will help organisations adapt seamlessly to changing regulatory requirements. We hold accurate personal and financial data that makes conducting affordability checks simple and we have robust systems in place to support everything from security to data analysis.

We have existing relationships within the gaming industry, advising and supporting operators on subjects including fraud prevention and bonus abuse to affordability and managing customer journeys.

Our solutions ensure to-the-letter compliance and minimal consumer disruption across the board. For gaming companies, we have a holistic package of services that help with issues such as robust identity verification, identifying vulnerability and setting safe customer limits specific for the business.

Through a micro-service architecture, we make it easy to integrate new or improved services into your operating model, with a platform to grow and develop and generate new insights from our data. We can also help you monitor the impact of changes to demonstrate how improving your performance is delivering on your commitment to help players.

We can help you tailor your processes without impacting on player experience, ensuring the best possible commercial and social outcomes.





# Section 3:

## A truly single customer view

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### Is your current customer view strong enough?

With a wide variety of channels and apps available, players have choice and variety in how they can engage with the market. Unintentionally, players can create multiple accounts across platforms. More concerningly, problem gamblers can deliberately create multiple accounts in order to continue playing.

You will already have measures in place to audit your player population, accurately gauge their affordability, flag risks and intervene to mitigate real or potential harm. However is it sufficient?

#### Questions to ask your business:

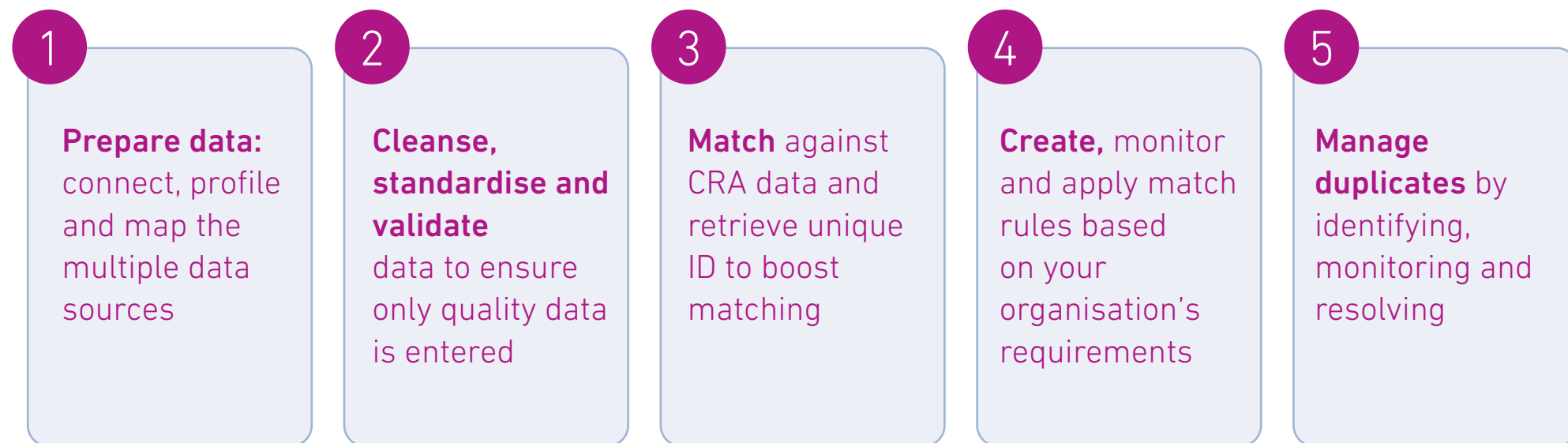
- Can you connect your customer data across all platforms and channels?
- Can you recognise existing customers when they open a new account on a different platform or brand?
- Are your identity and financial checks truly individualised?
- Are you seeing bonus abuse with a single player creating multiple accounts?
- Does each customer have a unique identification to support all interactions?



## What does a best practice single customer view look like?

A good single customer view is never complete. You need to have the process and systems in place to be able to continually manage the data as it is added and enhance the data you already have to maintain accuracy.

The key stages are:



All of this should be automated to drive efficiency and confidence. Taking a best practice approach will help you fulfil your duty to build a culture of safer gambling, providing you with compliant and accurate data that allows players to be audited and protected.



## What benefits does it bring to players and operators?



Gives you a clean view of the customer base to identify vulnerable individuals, self-excluders and problem gamblers – ultimately making it easier to minimise gambling harm



Supports initiatives such as the GAMSTOP data sharing scheme for players recognised as financially vulnerable



Makes it easier for problem players to exclude themselves from all UK-licensed gambling sites through one self-exclusion request



Reduces bonus abuse and affordability limit abuse by preventing players making multiple profiles with one operator



Supports compliance processes including KYC and creates a clear and compliant audit log by tracking and recording all relevant user data



Speedier resolutions to regulators' queries with clear and individualised data to hand



Allows database-level assessments and financial health checks to be run easily



Drives loyalty and retention through a better understanding of the player population. Operators can improve the customer experience through tailored communication and customer-centric decisions



## How Experian can help

Experian is uniquely positioned to help you create or enhance your single customer view. Our combination of identity resolution, data quality and single customer ID helps you create a complete picture of your customers and their gaming behaviour to manage spending limits and identify vulnerable players.

Available for use on-premise or as an Experian-hosted service, our **Aperture Data Studio** data management software platform uses industry leading data to automatically identify, match and enrich your customer data. It enables Gaming Operators to rapidly build the most consistent, accurate, holistic view of players and their associated data, helping you deliver safe and responsible gaming.





# Section 4:

## Player protection checks

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### The current situation

Currently, player protection checks have been carried out using the data that's readily available to you.

This may be volunteered by a customer and can include bank statements or transaction data from Open Banking. Alternatively, it may be modelled on summarised postcode information based on geodemographics and government estimates of income and expenditure for players.

A self-declared financial statement, which many operators base wagering limits on, will no longer suffice as a thorough and accurate risk assessment. These checks are often too generic, inaccurate and does not reflect someone's true financial circumstances – or cannot be used without consent, which many customers are reluctant to give.

Introducing a more prescriptive and risk-based approach can help better understand if gaming is likely to cause harm. More robust checks will help to accurately identify, and subsequently protect, the most financially vulnerable customers.



## What's changing?

To comply with enhanced player protection checks, you will need to verify affordability using personal financial data such as income and indebtedness. Much of this information, which can offer more personalised insights into a player's affordability, is held by UK banks and credit reference agencies.

Confirmation from the ICO that this information can be used to understand an individual's affordability to play is a big step forward. The practicalities of the checks are subject to input from the Gambling Commission's public consultation and the industry, working closely with banks, UK Finance and credit reference agencies including Experian.

## What does an enhanced player protection check look like?

There are anticipated to be three thresholds that would trigger more in-depth affordability checks for players:

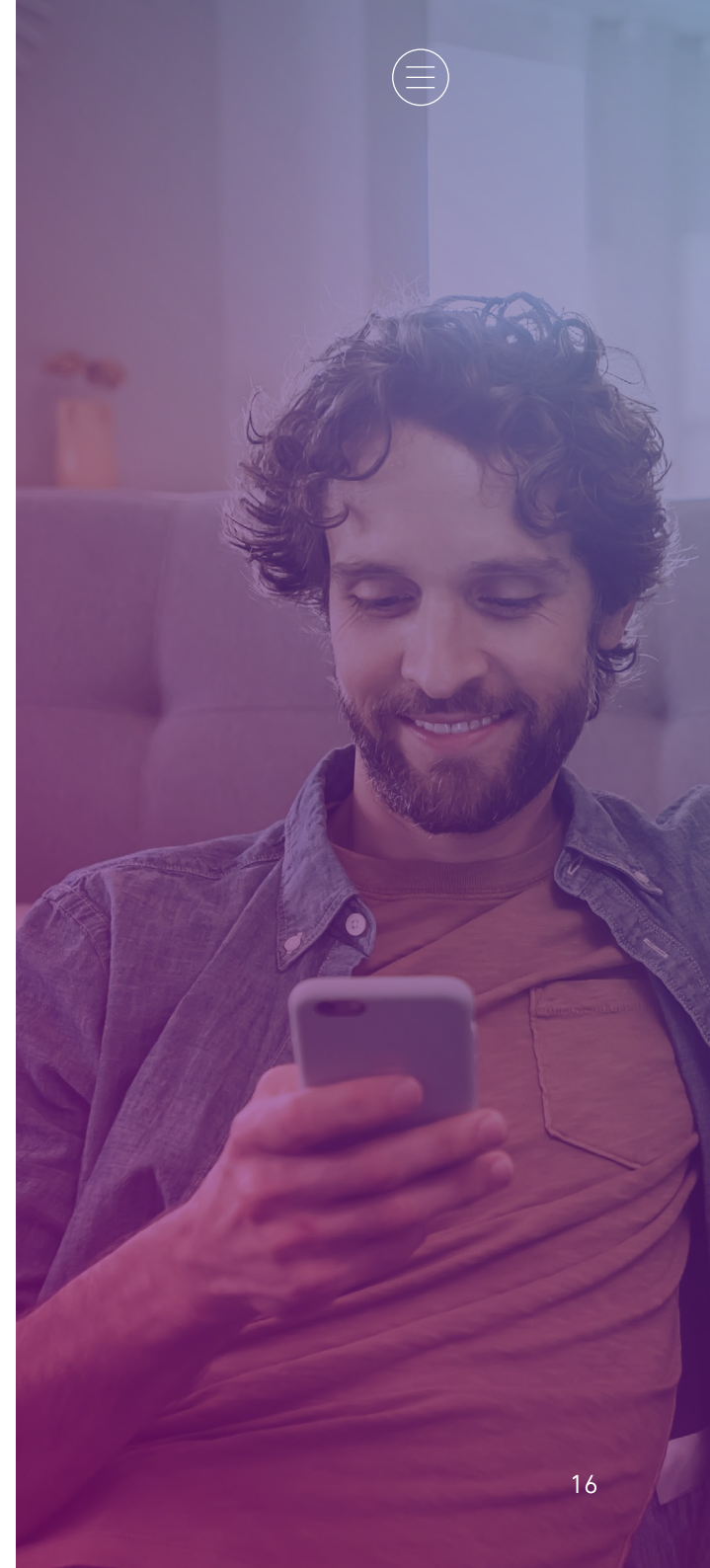
1. An existing player, suffering significant financial loss
2. An existing player, suffering significant losses over time
3. An existing player who is binge gambling

If a player has suffered a significant financial loss, then an operator must carry out a light-touch **Financial Vulnerability Check**.

This will include checking for past or current insolvency (County Court Judgements) and other high-level indicators of financial vulnerability such as a notice of bankruptcy. If a player crosses the threshold for more serious or habitual losses, or is binge gambling beyond their means, an **Enhanced Financial Risk Assessment** is required. This detailed check will likely include additional credit performance data, income and indebtedness and measures of indebtedness to determine a safe play limit.

The results of either checks require manual review, and if necessary, may prompt an operator to instigate more detailed analysis by asking players to volunteer more information on their financial well-being from paper bank statements, or digitally from sources such as Open Banking.

The proposed checks will only be carried out on customers that meet certain thresholds, and it's thought that around 80% of players will never be subject to them. Regardless, operators will need to be transparent and clearly explain to players that these checks will potentially be part of their gaming experience.







## What's the right approach to player protection checks?

### PROPORTIONATE

Allows operators to meet their duty to protect players from harm and spot those at risk. It balances that with a player's right to spend what they can afford, however they like, and respects their privacy. Operators can only trigger more rigorous checks when players reach certain defined financial thresholds.

### PERSONALISED

Operators have a clear view of key metrics for each player and can make accurate assessments of each person's continued capacity to gamble. This will end the use of postcode averages of income to determine a player's affordability.

### PLAYER FRIENDLY

Players enjoy a low-friction experience, with minimal impact on those who can afford their gaming. A clear single player view helps gaming operators understand the full extent of a player's gaming behaviour across multiple accounts to get an accurate view of their total level of spend.

Access to real-time affordability data leads to better risk decisions in the moment. By understanding financially vulnerable customers, you can prevent customers from gambling beyond their means and ensure greater protection.

Using external data sources such as Experian's bureau data in association with prescribed spending triggers allows you to accurately assess a player's capacity to continue to play affordably, and provides a non-intrusive way of mitigating harm, stopping players from getting themselves into financial difficulty.

This data can be used alongside data customers consent to being used, including digital payslips that help to verify employment and income and detailed expenditure information gathered through Open Banking. Analysis of disposable income and monthly balance, as revealed by a player's current account, will make sure any levels set are truly affordable and appropriate.



## How Experian can help

Experian offers affordability solutions that make it easy for operators to incorporate additional checks into their processes. Our checks are compliant, light-touch, and low friction. Players must be notified prominently on the use of bureau data to inform these checks when first onboarded or if an existing customer, in-game but unlike a postcode-based assessment of average income, our data provides personalised insights that paint a true picture of players' financial well-being. We can help you orchestrate and implement this data to make it easy to implement and deploy to maximise its value.

Operators that proactively identify potential sources and solutions around affordability data will experience minimal disruption once any new requirements are put in place.

We are working with operators, the regulator and the wider industry to help the industry shape these risk measures. Together, we can develop a framework for informed financial vulnerability checks and our services will support and develop in line with the Gambling Commission's consultation.





# Section 5:

## The highest standard of compliance

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### Is your current compliance robust enough?

The changes proposed in **The Government's 2023 whitepaper on gaming** make it clear that operators will need to carry out significantly more compliance work. The Gambling Commission's consultation now sets out the governance framework and expectations of operators to deliver. Though the specifics are yet to be decided, you'll need to conduct more frequent and sophisticated customer checks, with potentially bigger consequences for those who don't comply.

Regulators want to make it even more difficult for underage gamblers to register, for vulnerable customers to get themselves into financial difficulty and for fraudulent players to cheat the system.

You need to ensure that your seamless onboarding experience identifies and mitigates risk and your management of existing customers protects the vulnerable with a clear audit trail. The process must be able to robustly:

- Verify that new signups are real people, who are who they claim to be
- Exclude players who are on a PEP or Sanctions list
- Real-time detection for players who abuse bonuses
- Identify and respond to unaffordable spending

- Detect unusual behaviours or inconsistencies in the identity verification process

### Questions to ask your business:

- Do your identity match rates match the industry benchmark?
- Are you using all the data sources available to you for maximum pass rates?

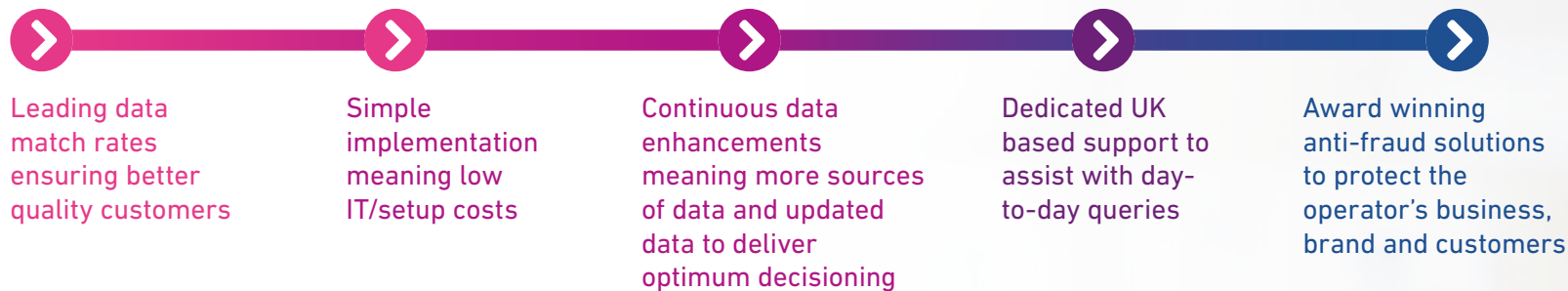
The right identity and age verification solution can make the process much easier.



## How Experian can help

Our best-in-class selection of identity attributes help operators validate the legitimacy and accuracy of an identity against digital identity markers. Our Identity Services solution is underpinned by the latest safer gambling and anti-money laundering (AML) requirements. Our Identity Services solution links your identity data and verifies it as genuine through additional checks – such as documents, public records and credit bureau data.

Experian's KYC/AML services help gaming organisations provide an outstanding customer experience, while helping compliance and minimising the risk of expensive fraud (such as bonus abuse). We offer:



Experian actively acquires data from all over the UK to offer comprehensive coverage, with more than 40 million records added in the last 24 months. Our broad proprietary data sets – such as BNPL data, rental payment data and CitizenCard – allow operators to make informed, confident decisions that make flexible, safe and fun play possible.





To speak to one of our experienced team about how we can better protect your players and help combat fraud in gambling, get in touch here:

**Experian Business Services | Experian Business**

**[www.experian.co.uk/business/industries/gaming](http://www.experian.co.uk/business/industries/gaming)**



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