



**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, maintaining a strong baseline of compliance, and partnering with trusted experts, gaming companies can lead the way in responsible gambling and customer-centric experiences.

Act now, to ensure you can grow sustainably while 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.

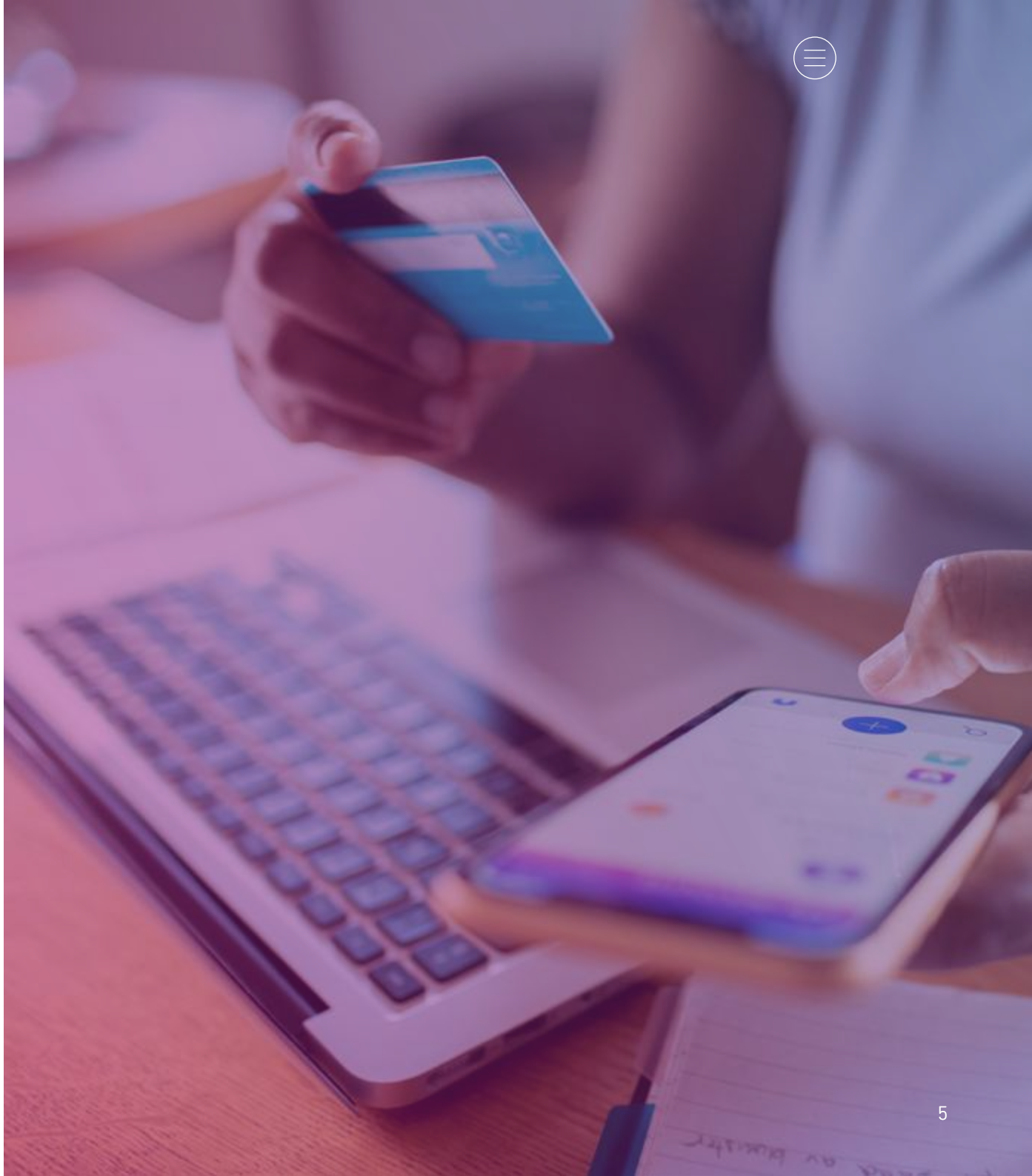


## What's changing now?

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

Following its public consultation, the Gambling Commission announced it will introduce mandatory basic financial vulnerability checks for all operators offering remote play in the UK from 30 August 2024. At the same time, it will begin a pilot phase for enhanced vulnerability checks, which applies to large operators in the highest three license fee bands.

The Information Commissioner's Office (ICO) has confirmed that operators are not breaching GDPR if they use UK credit reference agencies' personal credit performance data to better understand an individual's financial health. This clarification has given gaming organisations the green light to use this information to build a more accurate view of financial vulnerability.





## What are the key recommendations and changes?

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.

The first mandatory action to follow the Gambling Commission's public consultation will make frictionless player protection checks a reality to ensure play doesn't exceed players' means. From 30 August 2024, all remote play operators will need to:

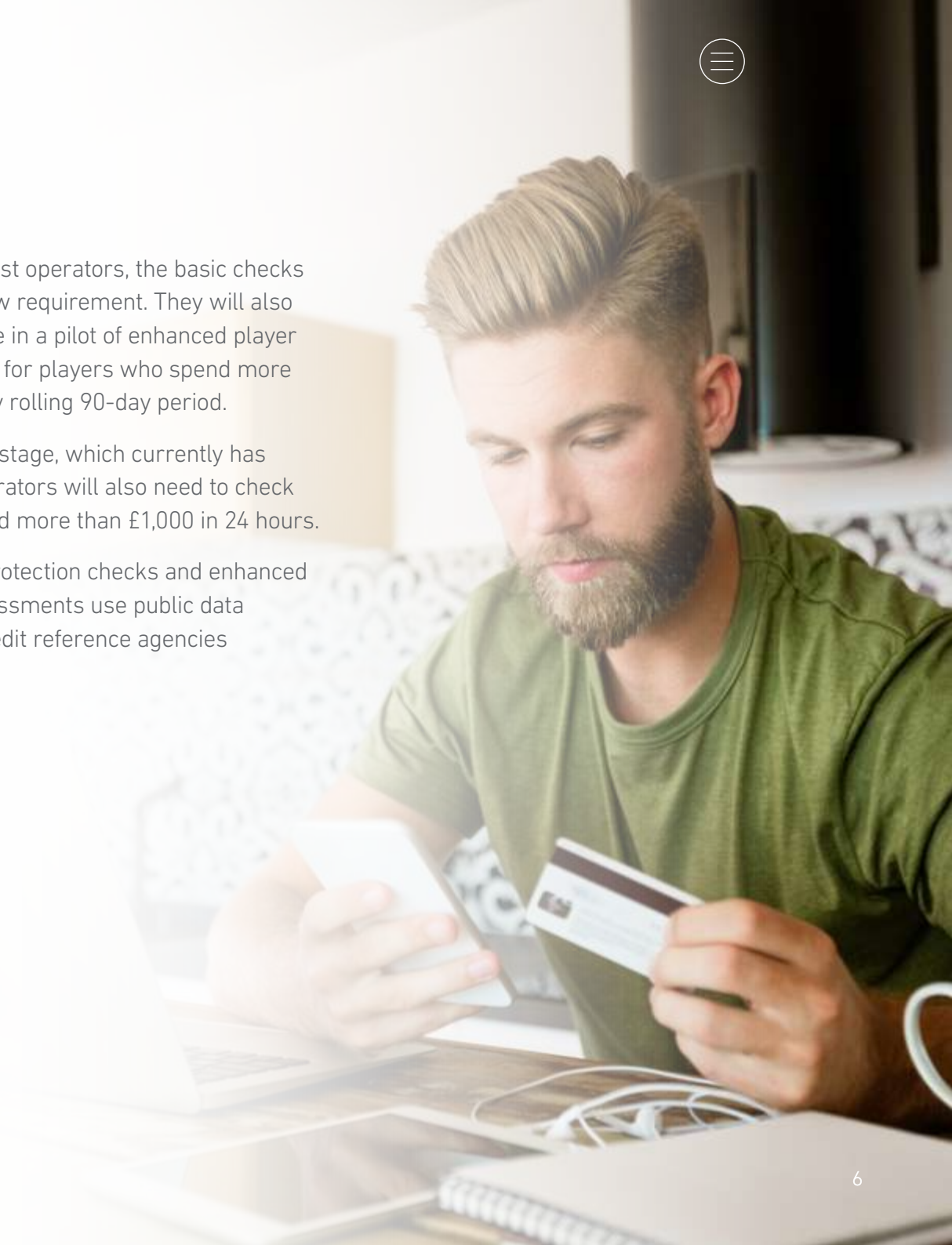
- **Investigate a player's financial vulnerability if they deposit more than £500 in a 30-day period. This limit will decrease to £150 in a 30-day period from 28 February 2025.**

These checks will look for publicly available signs of 'financial stress', which could include County Court Judgements and bankruptcy notices.

For the UK's largest operators, the basic checks aren't the only new requirement. They will also have to participate in a pilot of enhanced player protection checks for players who spend more than £2,000 in any rolling 90-day period.

In the pilot's third stage, which currently has no start date, operators will also need to check players who spend more than £1,000 in 24 hours.

Both the player protection checks and enhanced vulnerability assessments use public data available from credit reference agencies like Experian.





# 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.





## The right foundation will make compliance simpler

To stay on the right side of regulators and reduce the burden of compliance, it's crucial to prioritise finding the right approach and partner.

Operators will need more personalised data and to understand how to access it without breaching privacy regulations. 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, along with credit data, will be key. This 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.

There are three key actions operators should take in response to these changes:

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 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.

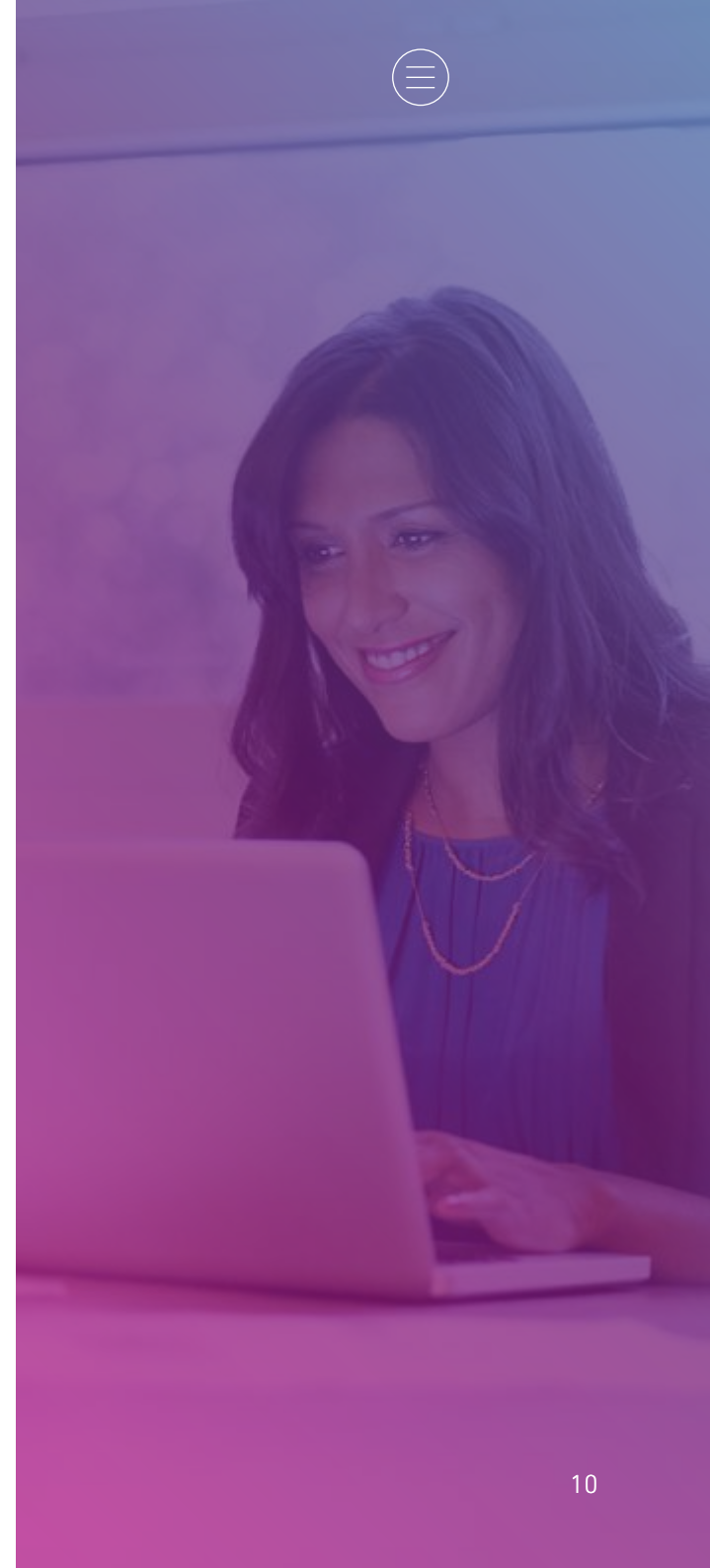
It can be hard to execute significant changes at scale and gain secure access to sensitive customer information. Enlisting the services of a trusted partner like Experian will help organisations adapt seamlessly to changing regulatory requirements. We hold accurate personal and financial data that makes conducting vulnerability 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 vulnerability 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 vulnerability, flag risks and intervene to mitigate real or potential harm. However is it sufficient?

### Questions to ask your business:

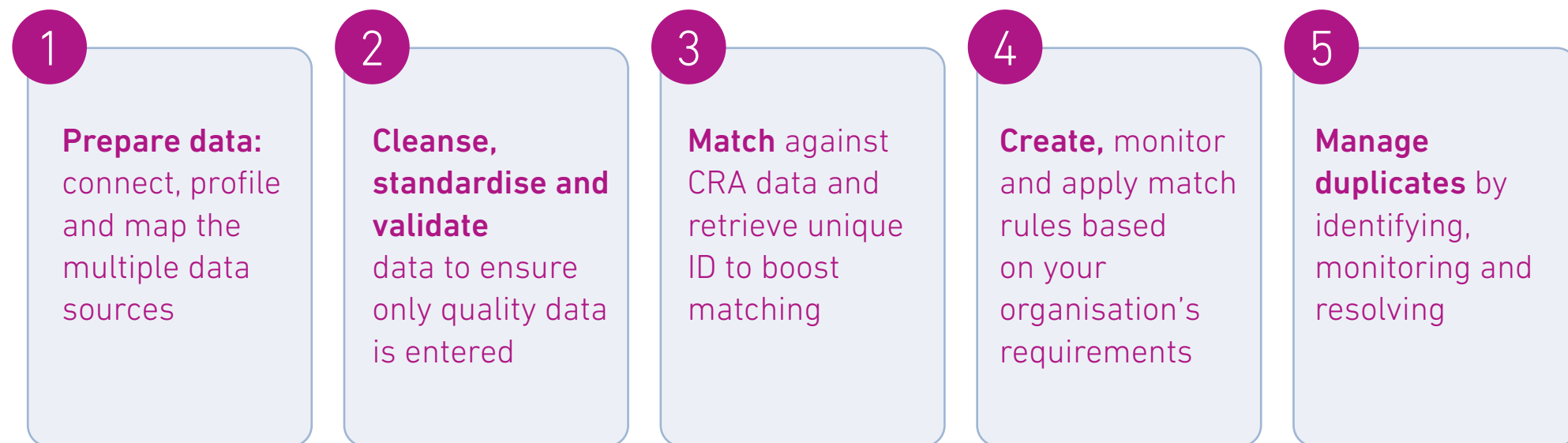
- Can you connect your customer data across all platforms and channels?
- Can you recognise existing customers when they open a new account on a different platform or brand?
- Are your identity and financial checks truly individualised?
- Are you seeing bonus abuse with a single player creating multiple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

Asking for a bank statement, or using open banking to 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. Most importantly, it's a time-consuming approach that adds unwanted friction into the customer journey.

Introducing friction-free vulnerability checks can help operators better understand if gaming is likely to cause harm. More robust checks will help to protect the most financially vulnerable customers without impacting the average player.



## What's changing?

To comply with enhanced player protection checks, you will need to perform a financial risk check and test for vulnerability using publicly available data. Much of this information, which can offer more personalised insights into a player's vulnerability, is held by UK banks and credit reference agencies.

Confirmation from the ICO that this information can be used to understand an individual's vulnerability to play is a big step forward. As the first phase of these checks begins, the industry will need to work closely with credit reference agencies including Experian to comply.

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

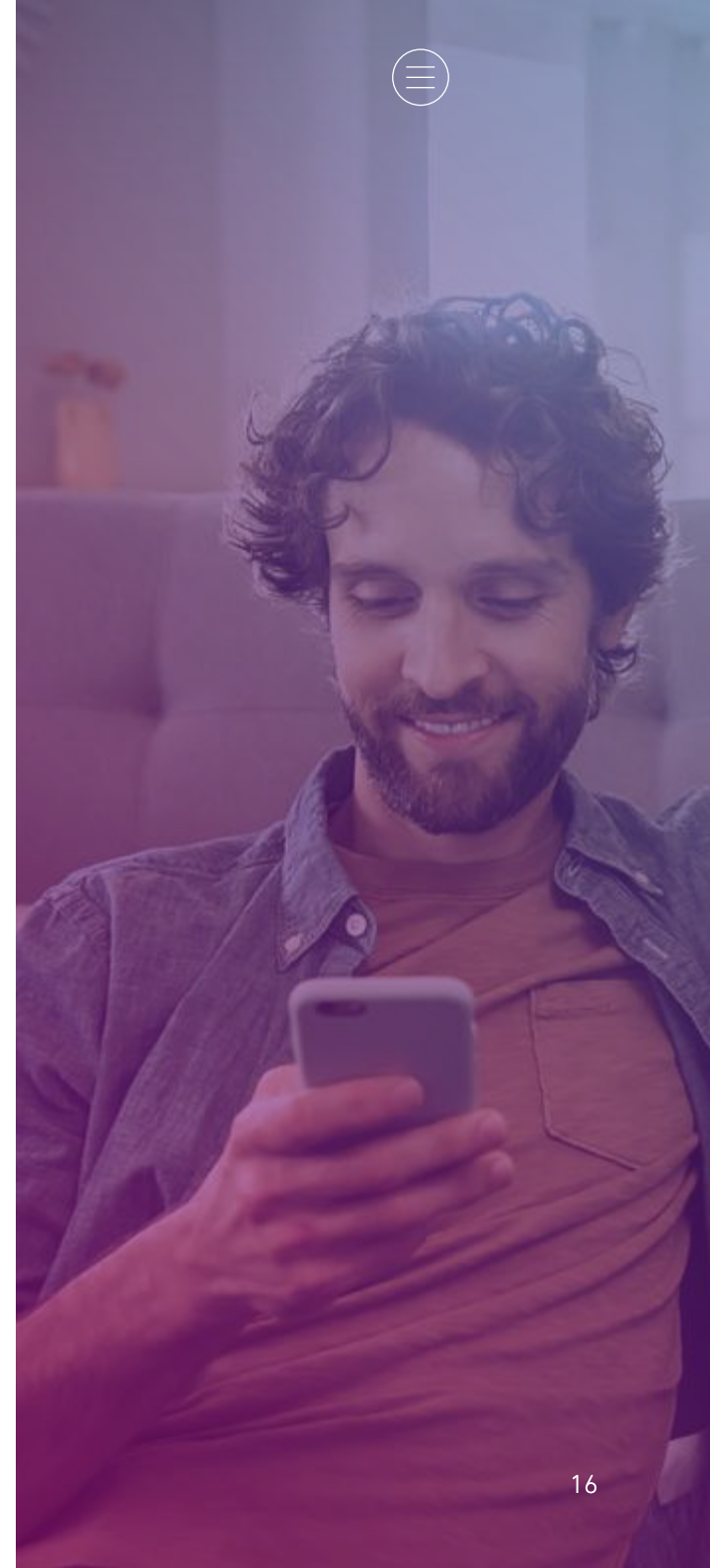
As explained, the Gambling Commission's enhanced checks pilot will look at more in-depth financial data to assess customers' risk.

Operators will need to work with a credit reference agency to obtain the right information. This will include data such as payment history, credit utilisation and aggregated current account turnover (CATO).

The results of either check require manual review, and if necessary, may prompt an operator to instigate more detailed analysis.

With the right partner, this process can be automated. Operators will also need to set processes around how they support customers that appear to be vulnerable.

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 vulnerability.

### 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 credit performance and vulnerability 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 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 vulnerability 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 that comply with the Gambling Commission's new checks.





# 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?

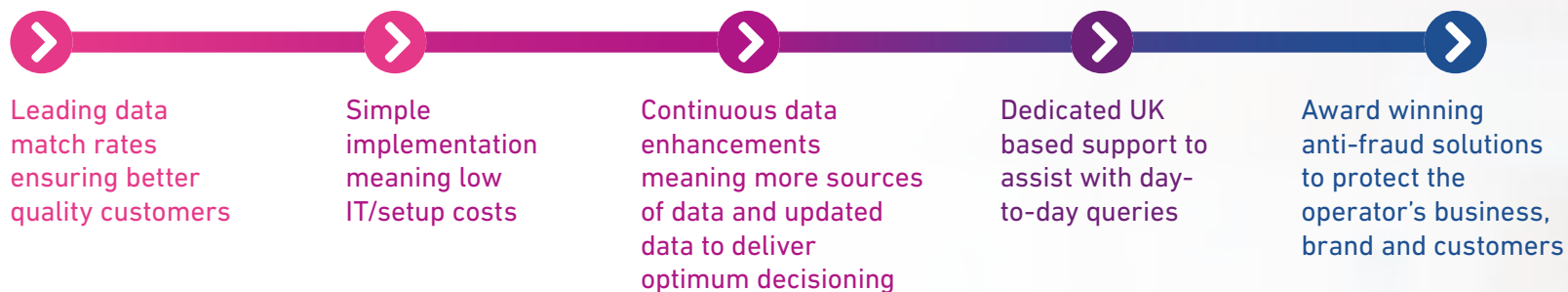
The right identity and age verification solution can make the process much easier.



## 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:

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



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