

# ICO Regulatory Sandbox Expression of Interest

## Getting started

Please use this form to submit an Expression of Interest in participating in the ICO's Regulatory Sandbox. Before completing this form you may find it helpful to read through all of the information on the Regulatory Sandbox on the [ICO's website](#).

Please be aware that as the ICO is a public authority, information submitted to the ICO may be subject to disclosure under the Freedom of Information Act 2000. In order to help the ICO deal with any such access requests, we request that applicants label any commercially sensitive aspects of their Expression of Interest. **Please do this by highlighting commercially sensitive sections of your application in yellow.**

### Your organisation's details

<b>Organisation name:</b>	Gambling Commission
<b>Organisation description:</b>	<p>The Gambling Commission regulates arcades, betting, bingo, casinos, gaming machine providers, gambling software providers, lottery operators, external lottery managers and remote gambling (online and by phone) that use British-based equipment.</p> <p>Gambling Commission is an executive non-departmental public body, sponsored by the Department for Digital, Culture, Media &amp; Sport.</p>

<b>Organisation website/URL:</b>	<a href="https://www.gamblingcommission.gov.uk/home.aspx">https://www.gamblingcommission.gov.uk/home.aspx</a>
<b>ICO registration number (if applicable)</b>	
<b>Where is the team developing your product or service based?</b>	Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP
<b>Who will be the assigned single point of contact in your organisation for the product or service entering the Sandbox?</b>	<i>PLEASE NOTE: ALL CORRESPONDENCE RELATING TO THIS EXPRESSION OF INTEREST WILL BE SENT TO THIS CONTACT.</i> Name: [REDACTED] Job role: [REDACTED] [REDACTED] [REDACTED] [REDACTED] Email address: [REDACTED]@g amblingcommi ssion.gov.uk Telephone number: [REDACTED]

## Your product or service

**Product or service summary:**

The Gambling Commission licenses and regulates online gambling operators. One of the licensing objectives is to protect the vulnerable from gambling related harms. Specific social responsibility codes mention processes and procedures for the purpose of risk identification and customer interactions and self-exclusions. Currently consumer protection requirements apply to individual operators. Academic research, our compliance activity and feedback from industry continue to highlight the shortcomings of any approach which only sees a consumer's activity within one operator. It is becoming increasingly clear that an approach where consumers' activity across multiple accounts can be seen together and risk-assessed will provide greater harm reduction benefits. An approach of this type would require data about players to be shared for the purpose of mitigating gambling related harm. We discussed the technological solutions and the industry views on the 'single customer view' challenge in February 2020, during an industry event, which included ICO colleagues supporting the day. Challenges around GDPR and legal basis for data sharing for this purpose have been highlighted.

The industry working group, led by the Betting and Gaming Council (BGC), has been working on proposals for trialling solutions which would test the technology as well as focus on measuring consumer impact. Discussions around these trials are ongoing with no confirmed practical applications timelines.

The Gambling Commission is continuing discussions with the ICO to understand the options available to support an industry trial. This might include regulatory changes.

<p><b>To which <u>key area</u> does your EoI relate?</b></p>	<p><i>Data Sharing</i></p>
<p><b>What personal data will your product or service process?</b></p>	<p>The Gambling Commission will not be processing data itself. However, it seeks ICO steer in understanding the legal basis for sharing account user data for the purpose of single customer view. This will allow us to explore how we can help the industry progress this work in line with the GDPR requirements.</p>
<p><b>What do you aim to achieve through Sandbox participation?</b></p>	<p>We would welcome the opportunity to work with the ICO Sandbox to explore questions related to the online gambling sector sharing consumer account activity data for the purpose of consumer protection.</p> <p>Specifically, to explore whether legal basis for sharing data for the single customer view exists. We would also like to understand the relevant options to allow us to make progress in developing an approach that would allow consumer protections to be based on activity across multiple accounts.</p> <p>Industry progressing to processing of data depends on our ability to provide regulatory comfort which would allow them to progress with a trial of a solution. We wish to explore the available options to provide that regulatory comfort. The stage of the project enables a flexible approach and shaping the solution in line with ICO steer.</p> <p>We welcome the opportunity to work with the ICO Sandbox Team and very much are looking forward to collaborating on this challenge.</p>

**Next steps**

Thank you for completing an Expression of Interest. Please note that by submitting this form you are certifying that the information you have provided is true and accurate and that you have the relevant authority to make this application.

Please submit your completed Expressions of Interest to [appliesandbox@ico.org.uk](mailto:appliesandbox@ico.org.uk). A member of the ICO's Sandbox Team will be in touch with you in due course to discuss your Expression of Interest.