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Developing a logic model for the ABB Code for Responsible Gambling and Player Protection

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Date: May 2015

Prepared for: The Responsible Gambling Trust

Version: 3

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Executive summary

- In September 2013 the Association of British Bookmakers (ABB) published a new voluntary code to promote responsible gambling. In February 2014 NatCen Social Research were commissioned by The Responsible Gambling Trust to evaluate the impact of the ABB Code (the Code).
- The first stage of the evaluation was to understand the underlying rationale or theory of the Code by mapping out the logic for the intervention, using a process known as a 'logic model'. The aims of the logic model were for those responsible for designing and implementing the Code to articulate its intended outcomes, and the mechanisms by which these outcomes would be achieved.
- The logic model was developed collaboratively during two workshops with key stakeholders from the ABB and from the bookmakers' industry. The logic model articulates the thoughts of those stakeholders about how the intervention will be implemented, what outcomes it will achieve and how these outcomes will come about.
- In the two workshops, it was agreed that the ultimate goals of the Code were to reduce gambling-related harm and to increase business responsibility and sustainability.
- To explain how these ultimate goals would be achieved, a series of short-, medium- and longer-term outcomes were articulated by participants across three broad areas: staff; machine tools; enhancements to existing practice.
- This report discusses each component of the logic model. It then sets out the perceived risks, challenges for measurement, and recommendations.

1 Introduction

1.1 About the ABB Code

In September 2013, the Association of British Bookmakers (ABB) published a new voluntary code to promote responsible gambling. The stated aims of this code were to:

“create a step change in responsible gambling thinking based around informed choice by adult customers, implementing new consumer protection measures that will make a difference” (ABB, 2013).

The Code for Responsible Gambling and Player Protection (hereafter referred to as ‘the Code’) was part of the ABB Harm Minimisation Strategy, which focused on improving performance at four levels of harm minimisation. These were:

- Issuing clearer and more accessible information on how to gamble responsibly and highlighting the sources of help available;
- Providing customers with new tools such as mandatory time- and money-based reminders, the ability to set spend and time limits on gaming machines (sometimes known as ‘FOBTs’) and to request machine session data;
- Training staff to detect the signs of potential problem gambling more quickly and to interact more effectively with those customers identified;
- Undertaking more consistent central analysis of data to identify abnormal activity in specific shops and, where possible, relating to individual customers.

To achieve this, a range of new measures was planned and implemented in bookmakers that had signed up to the Code in Spring 2014. These measures included:

- Window displays of responsible gambling messages, with 20% of window displays dedicated to these messages;
- Responsible gambling advertisements within bookmakers’ shops;
- Introduction of voluntary limits on machines in bookmakers allowing customers to set limits on how much money and/or time they wanted to spend on machines;
- Introduction of mandatory messages on machines, whereby a message was displayed to customers telling them they had gambled for more than 30 minutes and/or had inserted more than £250 into the machine and asking them if they wanted to continue;
- Enhanced staff training around responsible gambling and the promotion of more direct intervention with customers;
- Enhancement of existing practice around self-exclusion and age verification through improved staff procedures and practices.

The date of implementation for these new measures was 1st March 2014, at which point all staff would be trained, responsible gambling advertisements displayed, the ability to

set voluntary limits on machines in place and the mandatory limits and pop-up messages enabled.¹

It is estimated that around 80% of bookmakers are members of the ABB, including the four biggest operators (William Hill, Ladbrokes, Coral and Paddy Power). All members signed up to the voluntary code and supported its implementation in March 2014. In addition, Betfred, which is not a member of the ABB, signed up to the Code. This means that over 80% of bookmakers in Great Britain instituted these changes, making this the largest single change in responsible gambling practice among bookmakers in recent years.

1.2 About this study

In February 2014, NatCen Social Research was commissioned by the Responsible Gambling Trust to evaluate the impact of certain aspects of the Code, namely machine-based measures. The first step of this research process was to understand the underlying rationale or theory of the Code by developing an intervention logic model. The results of this process are the subject of this report.

For any policy or strategy to be worthwhile it must demonstrate that it achieves its stated objectives and has the intended impact. Before the impact of a policy can be assessed, it is important to set out the anticipated outcomes and impacts of the policy, and how and when change (individual or organisational change) is likely to take place as a result of an intervention. It is well-understood that some interventions, however well-meaning, can have unintended consequences and change behaviour in unexpected ways. For example, it is plausible that someone who chooses to set a voluntary limit on the length of time they want to play a machine actually sets a limit that is longer than they would usually play for, so that they can gamble without interruption. If this is the case, then the impact of the intervention may be to increase rather than decrease time spent gambling. This is one example to illustrate the range of potential impacts that might be observed and why it is important to consider these carefully.

To consider the range of outcomes, both intended and unintended, of an intervention it is important that those responsible for its design and implementation articulate what they expect will happen as a result of the intervention, what outcomes they expect to see and how they think those outcomes will be achieved.

Ideally, an intervention logic model should be developed in parallel with the design of the intervention so that from the outset, measureable outcomes can be delineated, measures identified, and effective data collection processes established. In reality, most logic models are created retrospectively after an intervention has been designed, and often after it has been implemented. In the case of the Code, the logic model was developed approximately three months after implementation. While this is not the ideal, developing an intervention logic model is valuable in order to set out in a transparent way what the intervention is trying to achieve and to inform the design of any evaluation.

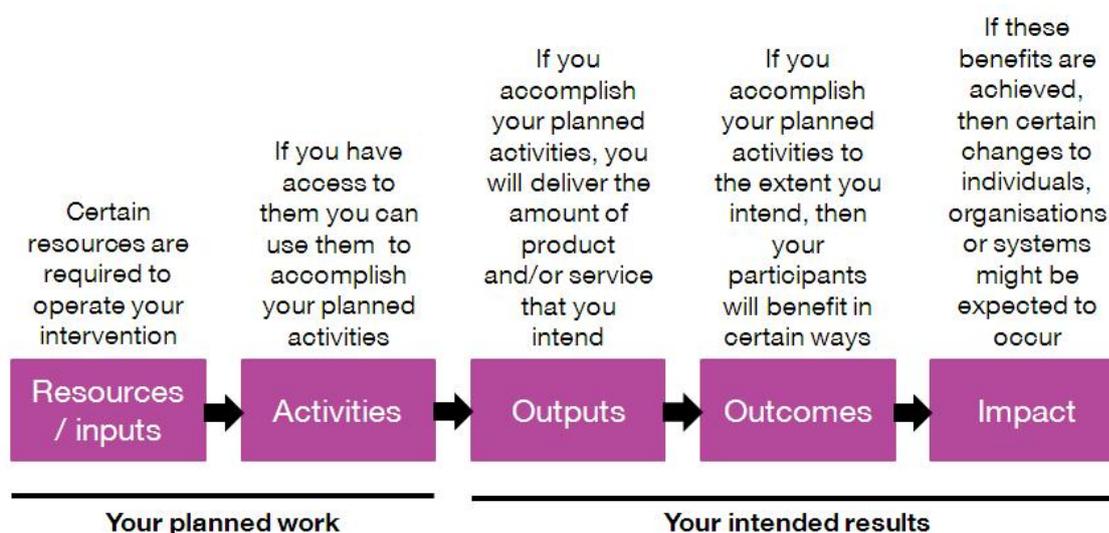
¹ The date of implementation was 1st March 2014 for 95% of bookmakers who signed up to the code. In the West Midlands, the date of implementation was 1st April 2014. This was so that the early impact of the Code could be assessed, using the West Midlands as a control area. Findings from that study are available in Salis, S., Morris, S., & Wardle, H. (2015) *The Association of British Bookmakers Code of Responsible Gambling: early impact evaluation of machine-based measures*. London: Responsible Gambling Trust.

2 The ABB Code logic model

2.1 The logic model approach

A logic model approach holds that programme interventions, in almost all cases, are based on an underlying logic or theory and are underpinned by a set of assumptions about how an intervention works. Intervention logic models are developed in a collaborative way among those responsible for the design and delivery of an intervention. This process is facilitated by independent researchers. At its core, this approach provides an explanation of how a group of stakeholders expects to reach a commonly understood goal.²

An intervention logic model is a systematic and visual way to represent a shared understanding of the component parts of an intervention. The development process considers the planned work of the intervention and its intended outcomes. A logic model separates the key components of an intervention which are usually structured in a linear model, as shown in the diagram below. Mapping an intervention in this way helps to visualise and understand how human and financial investments can contribute to achieving its intended goals.



Source: adapted from Kellogg Foundation (2004)

² Anderson, A. (2007) *The Community Builder's Approach to Theory of Change: A practical guide to theory development*. New York: The Aspen Institute. Available at: <http://www.epa.gov/evaluate/pdf/eval-guides/logic-model-development-guide.pdf>

Logic models are useful in the design and planning stages of a programme as well as for effective implementation and scaling-up. Importantly, a logic model provides an agreed framework for designing a robust evaluation to study implementation fidelity, identify data collection points to measure an intervention's success across agreed outcomes and assess impact. Finally, evaluations underpinned by a logic model help to understand how well a programme is functioning and where the programme has encountered delivery challenges, and how and where improvements can be made.³

2.2 The Code logic model methods

2.2.1 Our approach

The principal aims of developing a logic model for the Code were to better understand the desired outcomes of the Code and to provide a framework for subsequent evaluation of the Code. The process of developing an intervention logic model required consultation with key stakeholders who were responsible for designing the Code and those who are implementing it. This was achieved by identifying and inviting these stakeholders to attend two logic model workshops, held in June and July 2014 respectively. These workshops were facilitated by the first and second authors of this report.

The aims of the first workshop were to understand the background, policy context and rationale for the Code, and to set out the key components of the logic model. By identifying the short-, medium- and long-term outcomes that the Code aims to achieve, the discussion also covered the target groups for the intervention and the behaviour change that would be required for the Code to be considered successful. The key contextual factors that might influence successful delivery of the Code were also set out.

Following the first workshop a draft logic model, which presented outcomes in linear chains of influence, was developed and shared with workshop participants. Ahead of the second workshop, participants were asked to consider a series of questions in relation to the draft logic model. The second workshop discussion focused on refining the Code's outcomes, amending outcome chains and reaching a shared understanding of the intervention logic and the mechanisms that would result in the desired outcomes. After the second workshop the logic model was finalised.

Developing a common understanding and reaching some level of consensus are important elements in setting out the underlying rationale of an intervention. Therefore, the same group of participants attended both workshops.

2.2.2 Workshop participants

Generally, logic model workshop participants are organisational representatives or key stakeholders who are involved in the design and/or implementation of an intervention. Therefore, the logic model for the Code was developed in a collaborative process with relevant stakeholders from the Licensed Betting Office sector.

Workshop participants included two representatives from the ABB, representatives from two organisations⁴ that supply gambling machines to bookmakers and representatives

³ W. K. Kellogg Foundation (2004) Logic Model Development Guide.

<http://www.epa.gov/evaluate/pdf/eval-guides/logic-model-development-guide.pdf>

⁴ Representatives from Inspired Gaming Group and SG Gaming took part in the workshops.

from five major betting shop operators who had implemented the Code: Betfred, Coral, Ladbrokes, Paddy Power and William Hill. There were 10 participants in total.

Participants were invited by email to take part in the workshops. The purpose of the workshops was explained and the importance of attending both workshops was emphasised. It was made clear that the attendees needed to have some knowledge of how and why the Code was developed and about its implementation.

The 10 workshop participants were senior members of staff within their organisations. Following the first workshop, they were encouraged to include a wider group of colleagues to discuss and comment on the draft logic model. Feedback was shared with the research team via email and discussed in the second workshop, prior to the final logic model being agreed.

2.2.3 What the logic model represents

It should be noted that, because of the collaborative workshop process, the logic model developed and presented in this report is a representation of how this particular group of stakeholders understands the Code and what it aims to achieve. Consequently the Code logic model developed from the workshops can be considered a conceptual design document which can be amended as an intervention changes, based on learning derived from implementation or in response to changes to the policy or contextual delivery landscapes.

The logic model with the individual outcomes for the Code is presented in Appendix 1. The discussion that follows describes the main outcomes of the logic model and related contextual considerations as they were articulated by workshop attendees.

2.3 Components of the logic model

2.3.1 Goals and outcomes

Ultimate goals and long-term outcomes

The group agreed that the Code wanted to create a step change in responsible gambling thinking. This is about creating a real change in the culture and attitudes of staff within shops, senior management within the industry and among players themselves. This theme flows throughout the logic model and the Code itself.

Stakeholders were clear that the Code is about improving informed adult choice: giving information and tools to players so that they can make decisions about gambling responsibly for themselves. Stakeholders were clear that the Code is not about 'nannying' players.

Stakeholders emphasised the importance and intention of monitoring and improving the Code as new evidence emerged. It was recognised that the Code was based largely on academic evidence and that implementing the Code would develop a more applied understanding of what worked in improving responsible gambling in betting shops. Stakeholders felt the Code was evolutionary and would change and adapt to new evidence over time to maximise the opportunity to achieve the Code's ultimate goals.

Ultimate goals

The ultimate goals of the Code articulated during the workshops were to:

Reduce gambling-related harm

This was articulated as a 'clear pillar' of the Code and as something which is achieved by providing information and tools to players so that they can take responsibility for regulating their own behaviour. Providing information and tools allows players to make informed choices about their gambling. The group agreed that this was an individual level outcome, that is, the responsibility of operators was to provide sufficient information which is acted upon by individual players. Stakeholders agreed that within the customer base there are different customer types whose interactions with the Code will result in individualised pathways to reducing gambling-related harm. These types are expected to interact with the Code in different ways. This is discussed further in section 2.3.3. There was no clear definition articulated of 'gambling-related harm'. Further clarity of this concept is important to ensure that achievement of this ultimate goal is measurable in the future.

Increase business responsibility and sustainability

Stakeholders strongly felt that being a responsible business meant continuing to invest in development and in social corporate responsibility initiatives focused on reducing gambling-related harm. They agreed that this would be measured by the level of investment in the business, revenues and profits, and reduction in gambling-related harm. While financial outcomes are relatively easy to measure, it is to be noted that there is no agreement on a definition of what constitutes gambling-related harm. A definition would need to be agreed before outcome measures could be determined. In addition, the view was that the Code would result in the type of business stability needed to confidently set out longer-term strategies and growth plans. The expectation is that

effective implementation of the Code would reduce the level of uncertainty in the industry overall.

Longer-term outcomes

To achieve these ultimate goals, it was agreed that a number of sequential longer-term outcomes had to be realised. These are:

1) Achieve a sensible level of regulatory involvement from Government in a free, fair and transparent market place

Ultimately, achieving a proportionate level of regulatory oversight which was evidence-based was considered by stakeholders as instrumental in building a responsible and sustainable business. Stakeholders discussed the difficulties of securing investment in a market which, at present, has high levels of uncertainty due to proposed changes in Government regulatory intervention. Stakeholders felt that industry commitment to responsible gambling would be demonstrated by successful implementation of the Code, which would result in what was defined by stakeholders as a 'sensible level' of national regulatory intervention. It was also articulated that successful implementation ought to include regular reviews and improvement of the Code so that it continued to be responsive and effective.

2) Gambling within betting shops is deemed to be a safe leisure activity

It was argued by workshop participants that if gambling in betting shops was deemed to be a safe leisure activity, operators would then be viewed as effective self-regulators. This would help to achieve the desired 'sensible level' of regulatory intervention. There was discussion about the wording of this outcome, with some stakeholders suggesting that this outcome was more about public and media perceptions of the industry. The other view was that the Code was designed to bring about real change so that gambling within betting shops is a safe leisure activity. Stakeholders emphasised that this outcome did not in any way imply that gambling within betting shops was currently an unsafe activity.

In order to realise the above two longer-term outcomes, stakeholders articulated **two precursor longer-term outcomes** as follows:

Maintain betting shops as a safe environment

The group clarified that safety in this respect was about safe gambling (in contrast to harmful gambling). Stakeholders explained that a 'safe environment' was not about personal safety in the context of local area characteristics. Criminal or anti-social behaviour in betting shops was seen as a function of the area in which betting shops were located, and not about betting shops themselves. It was felt that betting shops are currently safe environments and that the long-term objective of the Code is that this is maintained.

Reduction in number of at-risk gamblers who become problem gamblers

It was suggested that if players who were at-risk of becoming problem gamblers interacted in the intended way with the machine tools, they would be more able to self-regulate. This would then reduce their risk of becoming problem gamblers. There was no clear definition articulated about what constituted an 'at-risk' player. This would need to be considered and agreed to enable a consistent measurement of this outcome.

To achieve these longer-term outcomes and the ultimate goals of the Code, stakeholders articulated a series of shorter- and medium-term outcomes. Two distinct

sets of these outcomes were set out for the Code's two key target groups – staff in betting shops and gaming machine players. Staff outcomes and player outcomes are explained separately in the following sections.

2.3.2 Staff in betting shops

Achieving the longer-term outcomes

Staff within betting shops were identified as a key group that would be instrumental to the delivery and eventual success of the Code. The main activity for staff would be Code specific training to supplement an existing training programme. The tangible outputs of this staff training were described as follows:

- Staff within betting shops are better trained to address 'problem gambling' behaviours;
- The number of staff-customer interactions;
- Responsible gambling Key Performance Indicators incorporated into staff assessments.

A number of shorter- and medium-term outcomes were articulated by the group. These form the outcome pathways expected to lead to the longer-term outcomes and ultimate goals of the Code. It was noted that to ensure tangible change among staff, training needed to be led from the top, to demonstrate that change formed part of the corporate culture.

Shorter-term outcomes

Stakeholders felt that staff training should lead to direct shorter-term outcomes. These include improved staff understanding of the topics and issues that the Code addresses and the associated skills required to successfully deliver the activities set out in the Code. These are:

- Increase awareness of:
 - a wider range of problem gambling indicators
 - the responsible gambling help and information that staff are expected to promote;
- Increase knowledge among staff of machine tools;
- Increase staff skills (including communication, conflict management, dealing with problem gambling and awareness of responsible gambling initiatives).

It is to be noted that existing staff training regarding the Code is operator-specific, and there are currently no plans in place to develop a training programme for the Code that is consistent in format across all operators. Operators have agreed a minimum training standard necessary for achieving the objectives of the Code and have agreed that their training must meet this standard.

Medium-term outcomes

Workshop participants articulated the expectation that after successful completion of training on the Code, staff will have acquired the necessary skills, awareness, and knowledge to apply the Code in effective ways. This means that they will be able to enhance or modify how they interact with players. The range of medium-term outcomes articulated for staff who would be responsible for delivering the Code are explained below.

Increase staff confidence to address potential problem gambling

It is anticipated that as a result of participating in the training, staff members will feel more able to apply their newly acquired knowledge of problem gambling indicators and machine tools messages. Stakeholders felt that the knowledge staff gain will also mean that they feel more confident in addressing signs of problem gambling in a more effective or timely way.

Staff better able to communicate responsible gambling messages and tools

Following the staff training it was expected that staff would have improved or enhanced their communication skills so that they were better able to explain responsible gambling messages and machine tools to players. Stakeholders recognised the importance of doing this 'in the right way'.

The communication of messages was considered by stakeholders to be very important, with a focus on being a responsible gambler rather than on problem gambling. Stakeholders wanted to encourage take-up of the tools by all, shifting away from positioning the messages and tools as being for 'problem gamblers', as the stakeholders wanted to avoid stigmatising players who did not consider themselves to be problem gamblers. Positioning the tools and messages as a positive way of gambling responsibly was the preferred approach which stakeholders wanted staff to implement. It will be important to get this message across consistently to staff in the training.

Increase opportunity for staff to spend time with customers

The group felt that it was important to increase the opportunity for staff to spend time with customers. They anticipated that staff training would include the expectation of spending more time on the shop floor and interacting with customers.

Increase quality staff interactions with customers

The training to increase staff skills and the increase in confidence in staff was expected to make staff feel better able to interact with customers. Staff feeling better able to interact with players would likely result in more time being spent on the shop floor (potentially increasing the number of staff-player interactions). It was not clearly articulated how the process of interaction would work and precisely when staff would be expected to intervene. The ABB may wish to consider how to promote consistency and high standards across all operators so that staff in betting shops apply this in a consistent way. This should include guidance and standardised processes on how to escalate problems, log interactions, and communicate actions required by management.

There was discussion about whether the intended outcome was to increase the number of interactions or to increase the 'quality' interactions. The group agreed that interactions needed to be of good quality to be considered successful. However, it was pointed out that there is no agreed definition of what counts as an interaction, and what might constitute a 'quality' interaction.

The stakeholders recognised that it was important to agree this but that until now, it has not been possible due to differences in practice across operators. The different business systems used to record interactions was also noted here as a barrier to consistent measurement across all ABB member operators.

Increase staff commitment to responsible gambling

The group considered this to be an outcome that would flow from the training, the increased knowledge and awareness and the increased interactions with customers. Increased staff commitment is something the group felt was essential in working towards creating the desired step change in responsible gambling thinking. This is expected to take longer to achieve than the other medium-term outcomes as it will take time to embed responsible gambling approaches firmly into everyday business processes.

It was felt that as commitment to responsible gambling increased among staff there would be a broader cultural shift in processes, working practices and in the way staff interacted with players. It would have a positive effect on the betting shop environment.

Assumptions

There were a number of assumptions articulated by the group about the staff related outcome pathways identified in the logic model. Achievement of all of the outcomes that lead from staff training depends on the **training being effective** which means covering the right topics and delivering this at the right time and in a way that it result in the desired behavioural and cultural change that the Code is designed to achieve. It was agreed that training should include refresher training to reinforce behaviours and best practice and to give staff opportunities to share their experiences. Monitoring of training by management was discussed as a method to ensure that all staff received the necessary induction and refresher training.

All of the outcomes assume that **staff will engage** with the training in a meaningful way that will enable them to apply their learning as intended. There is a further assumption that middle and senior managers across all operators continually demonstrate awareness and commitment to responsible gambling and provide the necessary support to betting shop staff.

There is an underlying assumption that there would be **enough staff in betting shops to allow them to engage with customers**. It was recognised by the group that the Code represents a change in what is expected of staff, in particular, in the time spent on the shop floor. If staff are expected to spend more time doing this, all of the outcomes assume that there are enough staff available within shops to do what is expected. There was no discussion within the groups of increasing staff numbers or about how the outcomes would be managed in shifts staffed by only one employee.

A further underlying assumption is that **staff-customer interactions have positive outcomes**. There was limited discussion about staff interacting with the 'right players in the right way' – an imperative requirement to successful delivery of the Code. The outcome pathways articulated by stakeholders assumed that staff-customer interactions in relation to the Code would be positive experiences. There needs to be an acknowledgement that staff-player interactions may lead to unintended negative consequences and discussion of what these negative consequences might be.

Overall, a management decision on the best way to delineate responsibility between floor staff and managers for the delivery of each aspect of staff-player interactions would need to be clearly set out.

Risks

A number of risks to achieving staff outcomes were discussed by stakeholders. These are:

Inconsistent format of training – despite the agreed minimum standard of training that has been developed, the format and content of staff training differs from operator to operator. This means that training to apply the principles of the Code may be inconsistent and staff are likely to learn about its practical application in different ways. This could affect progress towards the shared stated outcomes. The group discussed that a minimum training standard for the Code has been agreed, and that operators are satisfied that their training meets the standards it sets out.

High staff turnover – this was considered to be consistent with other retail operators. High staff turnover means that regular induction training will need to be in place for new employees. There is also the risk that changing what is expected from staff (for example, requiring staff to spend more time interacting with customers and promoting responsible gambling messages) could lead to a higher staff turnover in the short-term, as there may be existing staff members who do not want a change in their role and responsibilities.

Cost of staff training – the group discussed the cost of training and the significant investment it entailed for each operator. This issue was thought to be particularly salient in what was considered an uncertain business climate. The cost to operators of providing training on a regular basis and of monitoring that training was seen as a risk to the success of the Code, particularly among smaller independent operators.

Lack of staff buy-in – the success of the Code depends on changing the attitudes, behaviour and culture of staff in shops. The ABB may wish to consider how staff could be involved throughout the training and development process in order to build greater commitment and buy-in to effectively deliver the Code.

Measurement

Measurement of the outcomes set out in the staff outcome pathways presents some challenges for an evaluation. There are two main challenges for measurement of the staff outcomes; a lack of consistency in practice across operators, and a lack of definition of some of the less tangible aspects of the outcomes. The ABB may wish to consider the following, which would aid measurement of the outcomes in an evaluation:

- Developing a specification of the content and format of the minimum training standard which can be applied consistently and monitored across all operators;
- Developing a definition of what constitutes a staff-customer interaction (including the consideration of 'quality') and how this could be recorded across operators. The difference in recording systems across operators would need to be considered here;
- Developing a staff survey which could be administered across operators to measure attitudes, confidence and knowledge. This would require operator input to ensure that there was agreement about what terms like 'attitudes', 'confidence' and 'knowledge' mean in this context so that the most appropriate measures could be developed.

As part of a broader process study to assess implementation fidelity and explain any effects, in-depth interviews with staff members and more senior staff within operators would provide important insight into perceptions of the training, experiences of delivering the Code, and the culture change that is expected to result from the delivery of the Code.

2.3.3 Machine tools

Achieving the longer-term outcomes

Alongside general responsible gambling messages, two types of machine tools which require player interaction are available for players – mandatory messages/alerts and voluntary limits. These machine tools are screen pop-ups showing players how much time and how much money they have spent playing. The mandatory messages programmed into machines pop up based on limits determined by operators, whereas voluntary tools allow players to set their own time and money limits.

In addition, there are sections of the Code which are not directed solely at machine players. These include the provision of improved responsible gambling messaging, signposting to organisations like GamCare, and enhancements to existing processes such as age verification.

The tools targeted at all gaming machine players were identified by workshop participants to be the main focus of the Code. The tangible outputs of the Code associated with machine tools which may help to track individual customer behaviours are:

- Setting voluntary time and spend limits and the associated alerts that come from these;
- Mandatory alerts as a result of every 30 minutes of play and/or £250 credit loaded onto the machine;
- The responsible gambling messages displayed on idle screens;
- The data collected by the machine during play.

Although these tools are available to all types of betting shop gaming machine players, it was not clear which type of machine player the Code is intended to affect the most. There was consensus among stakeholders that the most positive effects would occur among machine players at moderate or high risk of becoming problem gamblers.

Stakeholders made it clear that the tools and principles in the Code are not aimed directly at helping gaming machine players who are already problem gamblers or pathological gamblers. Although there appears to be no consistent definition of these two types of gambler, stakeholders speculated that there may be an increase in these two types seeking help as a result of the Code, but that machine tools alone may not help these types of gambler self-regulate.

At the other end of the player spectrum, there was agreement that the Code is not expected to have an impact on those players who are already considered to be 'in control' of their gambling, estimated by stakeholders to be the vast majority of machine players.

A number of shorter- and medium-term outcomes for gaming machine players were articulated by the group. These form the outcome pathways that are thought to lead to the longer-term outcomes and ultimate goals set out in section 2.3.1.

Shorter-term outcomes

- Increase knowledge of tools available to control gaming behaviour;
- Increase player awareness of responsible gambling and what problem gambling is;
- Increase player awareness of time and money spent on machines;
- Increase player knowledge of how to set voluntary limits on machines.

Workshop participants expected that by receiving machine tool messages and also through interactions with betting shop staff, gaming machine players would be able to make reasonable judgements about the time and money they spent on machine play. The information provided would then help players make decisions about their gambling which would lead to a set of medium-term outcomes comprising actions and behaviours considered desirable for gambling in a 'controlled' and responsible way.

Medium-term outcomes

Players increasingly stick to the limits set

Exposure to responsible gambling messages and machine tools is expected to lead to players interacting with the messages in positive ways. The key expected outcome articulated was an increase over time in the number of players who are able to stick to time and spend limits that are pre-determined or set at the start of play.

There was much discussion about whether the outcome should be 'an increase in voluntary limits set' or 'a decrease in the number of voluntary limits exceeded'. Overall, the group agreed that the number of limits set was not relevant, as this could vary over time and was not necessarily a measure of controlled play. They suggested that a reduction in the number of players setting limits could actually be a reflection of better self-regulation among players. 'Players increasingly stick to the limits set' was agreed to be the most appropriate outcome.

Increase customer ability to stay in control of their gambling

As a result of the effective interaction with machine tools and responsible gambling messages, a behaviour change outcome for all players was articulated. It was hoped that responsible gambling information, together with the time and spend options available, would lead to players being more able to stay in control while gambling. Stakeholders felt this would be achieved through players being more aware of the tools and methods, and also understanding why it was important to gamble responsibly.

Players at-risk of gambling-related harm increasingly in control of their machine play

A behaviour change outcome specifically for a particular type of player was also set out. To make progress towards achieving the stated longer-term outcomes and in turn the ultimate goals of the Code, it was important that behaviour change among players 'at-risk of problem gambling' was achieved in the medium-term. This means that this type of player would need to increasingly interact in the desired way with the tools and

responsible gambling messages. Increasing the level of controlled play among this group (as opposed to all players) would indicate a measure of success. There is a need for stakeholders to reach a consensus about how to define an 'at-risk' player and importantly how this type of player can be recognised so that staff interactions are targeted and timely. Reaching a consensus about what defines controlled play is also important to ensure this outcome can be measured.

Increase in numbers of problem gamblers seeking help

Alongside the above medium-term behaviour change outcomes, there was a view that the Code may also influence and change the play behaviour for those classified as 'problem gamblers'. Although participants stated that the Code is not targeted to this group, it was suggested that if problem gamblers engage with the materials and messages, an increase in the number of problem gamblers seeking help could be expected.

Assumptions

There were a number of assumptions articulated by the group about the player outcome pathways set out in the logic model.

The outcome pathway suggested by stakeholders assumes that players will receive and interpret behaviour change messages (stimuli) in a rational, considered way (this is an underlying assumption of many interventions). This would trigger rational responses which players would act upon to instigate behaviour change. There was some discussion that gambling is an 'adversarial' pastime that can elicit emotional responses which may be negative. It may be that this emotional response sometimes drives players' actions and in these cases, they do not behave rationally.

The group recognised that the Code assumes that **players firstly notice and secondly read the messages**. As the materials and messages are all written in English, there is an assumption that players will be able to understand them. Players who do not read or speak English or have poor literacy skills, would be unlikely to interact with the tools and associated messages. More widely, there is the assumption that players have the skills required to interact with the messages in the desired way leading eventually to the stated outcomes.

Stakeholders discussed the importance of formulating messages in ways to ensure positive responses from players. The success of the Code depends partly on the assumption that **players feel the messaging is relevant to them**. This was thought to be particularly important for players who could be described as 'at risk of gambling-related harm', as it is this type of player that is the principal target of the Code. A point noted by the group was that messaging should be aimed at promoting responsible gambling rather than preventing problem gambling, as the term 'problem gambling' carried a stigma which players may not wish to be associated with.

An underlying assumption is that **players are currently unaware of how much money and time they spend** on machine play, and a further assumption is that **players will welcome being more aware of this**. The group stated that the vast majority of players were already in control of their gambling and were not the target of the new measures within the Code.

Risks

A number of risks to achieving the stated player outcomes were discussed by the group. These are:

Effective marketing messages – it was thought important to make sure that the messaging and marketing of the tools is appropriate to the target group. In addition, staff would need the necessary skills to communicate the message in appropriate ways. It would be important to understand how betting shop customers, and particularly the different types of gaming machine players, understood and reacted to the marketing of these tools.

Only controlled gamblers will use the tools – it may be that those who are already in control of their gaming play interact most effectively with the machine tools. This type of player is likely to be more aware of their behaviour and may use the tools as a way of verifying or checking their level of 'control'. According to workshop participants, the use of the tools by more controlled players would not necessarily be an indicator of the Code's success as, in reality, this group is unlikely to need the tools to control their gambling. This is an important consideration for measurement of the outcomes, particularly around the proportion of players who stick to the limits set. It was speculated that if, in the short-term, the tools are used by players who are already in control of their gambling, the proportion who play within the set limits will be high. A subsequent shift towards 'at-risk players' using the tools could lead to a reduction in the proportion of players sticking to limits set. It is therefore, of significant importance that player types are defined clearly and consistently and these definitions used for analytical purposes.

Two further risks or unintended consequences noted by the research team are:

Saturation of responsible gambling messages – it was noted that the volume of responsible gambling messages that players are exposed to may result in saturation so that players 'switch off' and these messages no longer have the intended effect on player behaviour. Players may not engage with the messages as they feel that they have seen them all before.

People spend less money on machines – an unintended consequence of these responsible gambling measures could be that as some players become more in control of their gambling, they may choose to spend less money and less time on betting shop gaming machines than they previously did. This could affect progress towards the ultimate goal of becoming a sustainable business. Stakeholders defined a 'sustainable business' as one that is profitable. If money spent in betting shops, and more specifically on gaming machines, decreases, there is a direct impact on business revenue and profits, which in turn could affect future investment. However, stakeholders noted that ultimately the outcome of players who were in control of their gaming behavior was more important than any loss of revenue due to a reduction in the amount spent on gaming machines.

Measurement

Measurement of player outcomes pathways set out above presents different challenges for an evaluation than those described in the staff outcome pathways. The ABB may wish to consider the following, which would aid measurement of the outcomes in an evaluation:

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- Developing a survey of player behaviour across operators to monitor use of and motivation for using tools, levels of self-regulation and levels of at-risk and problem gambling;
 - Developing an agreed definition of different player types, such as ‘at-risk players’. This may take the form of a risk rating (e.g. low risk, moderate risk, high risk). Defining what ‘controlled’ gambling looks like is also important. While these are difficult tasks, these definitions are essential for adequate measurement;
 - Considering ongoing commitment to future national representative surveys as a source of information on prevalence of problem gambling and on wider attitudinal and perception measures, such as whether people think gambling within betting shops is a safe leisure activity;
 - Gaining insight into player perceptions and experiences of machine tools, associated responsible gambling messages, and of Code-related interactions with staff;
 - Considering sensitivity testing of the player session definition applied to machine data.

In addition to machine data analysis and surveys, in-depth data collection with a range of player types would be important to include within an evaluation to understand how tools are viewed, messages received and any associated behaviour change responses. It would be important to explore whether customers feel there is more informed choice as a result of the Code.

2.4 Enhancements to existing practice

Stakeholders discussed a number of enhancements to existing practice that were included within the Code to strengthen responsible gambling and player protection. These included:

- improved access to self-exclusion by training all staff within betting shops to administer a self-exclusion and providing more information to customers about self-exclusion;
- continued focus on age verification to protect the young and the vulnerable;
- improved responsible gambling materials such as window advertising, leaflets and posters.

Stakeholders believed that these enhancements, while not new elements of practice, would contribute to achieving the longer-term outcomes and ultimate goals of the Code.

2.5 Conclusions

The logic model presented sets out the agreed goals of the Code and how stakeholders expect to achieve these. The range of outcomes as articulated by stakeholders are set for the two target groups of the Code: betting shop staff and customers. The set of outcomes is sequenced based on the type of change that is desired. In the shorter-term, change relates to changes in knowledge, awareness, and skills, while in the medium-term, a range of behavioural outcomes have been identified. The longer-term outcome or impacts are also set out. An intervention logic model is usually used as a framework

to design a robust evaluation which deploys a range of qualitative and quantitative methodologies to test whether the articulated logic of the intervention hold true in practice. Logic models can be modified or adapted as the nature or content of an intervention changes or if evaluation evidence point to 'theory failure'.

The Code logic model presented in this document provides an appropriate framework upon which a robust evaluation design comprising process and impact studies can be constructed. The logic model framework also helps to identify the most appropriate outcomes for measurement, and to make decisions about what is measurable and what is not. It further helps to determine what data are needed and how it should be collected. Using the logic model to develop the evaluation framework will allow an assessment to be made on how well the Code is functioning, whether it is achieving the desired outcomes and where delivery challenges have been encountered. However, further work to clearly define some of the concepts articulated in the outcomes and ultimate goals of the Code is needed. If these definitions are not agreed, some outcomes in the model are unmeasurable. Clarifying the range of harms the Code ultimately aims to reduce and defining the different player types referred to throughout the model are steps that need to be taken before these outcomes can be assessed in an evaluation.

Appendix A: The ABB Code logic model

Short-term Outcomes

Medium-term outcomes

Impact (Longer-term outcomes)

Ultimate Goals

Staff

Increase awareness of:

- a wider range of problem gambling indicators
- the responsible gambling help and information they are expected to promote

Increase knowledge among staff of machine tools

Increase staff skills:

- communication
- conflict management
- dealing with problem gambling

Increase confidence to address potential problem gambling

Staff better able to communicate:

- responsible gambling messages
- tools to players

Increase opportunity to spend time with customers

Increase quality staff interactions with customers

Increase staff commitment to responsible gambling

Maintain betting shops as a safe environment

Become an even more sustainable and responsible business

Machine tools

Increase player knowledge of tools available to control gaming behaviour

Increase awareness of:

- time spent on machines
- money spent on machines

Increase player knowledge of how to set voluntary time/spend limits

Increase player awareness of:

- responsible gambling
- what problem gambling is

Players increasingly stick to the limits set

Increase customer ability to stay in control of their gambling

At risk players increasingly in control of their machine play

Increase in numbers of problem gamblers seeking help

Gambling within betting shops is a safe leisure activity

Achieve a sensible level of regulatory involvement from Government in a free, fair and transparent market place

Reduce gambling related harm

Enhancements of existing practice

Increase staff skills to complete self exclusions

Increase customer awareness of responsible gambling including self exclusion

Decrease in underage players

Improved access to and process of self exclusion

Reduction in number of at risk gamblers who become problem gamblers