



Mr Ivan Cartwright
His Majesty's Area Coroner
Town Hall Square
Leicester
LE1 9BG

5 September 2023

Dear Sir

Inquest touching on the death of Luke Ashton: Response to Regulation 28 Report

1. We refer to the Regulation 28 Report to Prevent Future Deaths dated 12 July 2023 (the “**Report**”), made following the inquest into the death of Luke Ashton.
2. This response is sent on behalf of Flutter UK & Ireland (“**Flutter**”), a division of Flutter Entertainment plc. Betfair is one of the core brands of Flutter. Further information on Flutter is set out in the Appendix.
3. Flutter takes customer safety extremely seriously, and we welcome the opportunity to respond to the Report. The purpose of this letter is to set out the steps taken, or intended to be taken, by Flutter in respect of the three matters of concern detailed in the Report.

Introduction

4. Before responding to the specifics of the concerns set out in the Report, we would like to give an overview of Flutter’s approach to customer safety. We would also like to once more express our sincere condolences to Luke Ashton’s wife and family for their loss.
5. Flutter holds itself to the highest standards in our industry and aims to lead in the area of safer gambling and customer protection. While the vast majority of people use our products without problem, we are aware that for some, gambling has the potential to be harmful. Therefore, safer gambling is a priority for all brands at Flutter, and we are constantly reviewing and updating our systems of checks and controls.
6. Flutter’s safer gambling strategy seeks to make every moment safe for our customers. This strategy sits at the very heart of Flutter’s business and within each of Flutter’s brands. The strategy was refreshed in 2022 after gathering insights from industry experts, customers and colleagues. We identified priority issues to focus on and assessed areas where we aim to go further. The five core pillars of Flutter’s safer gambling strategy are:
 - a. Discover - Proactively advance the industry’s understanding of gambling harm.
 - b. Educate - Improve all customers’ and colleagues’ understanding of gambling harm.
 - c. Empower - Give every customer the tools and understanding to use our products safely.

Flutter Entertainment plc is a public company limited by shares.
Registered Office: Belfield Office Park, Beech Hill Road, Clonskeagh, Dublin 4, Ireland.

www.flutter.com

Directors: J. Bryant (Chair) (U.S.), P. Jackson (Chief Executive Officer) (UK), P. Edgecliffe-Johnson (Chief Financial Officer) (UK), N. Cruickshank (UK), N. Dubuc (U.S.), R. Flint (UK), A.F. Hurley (U.S.), H. Keller Koeppel (U.S.), D. Lazzarato (Canada), C. Lennon, A. Rafiq (U.S.), M. Turner (Canada)

Registered in Dublin, Ireland no. 16956

- d. Understand - Identify everyone exhibiting higher-risk behaviours early in their risk journey.
 - e. Support - Interact with more customers and give the right level of support for each.
7. We also have a range of analytical models to identify signs of customer risk, as well as player protection tools that can be used by our customers. Details of those is set out below in our responses to the Coroner's concerns.
 8. Safer gambling is firmly embedded in Flutter's culture. All employees, whether customer-facing or not, are required to participate in regular safer gambling training to ensure that they have an understanding of the area and the main indicators of problem gambling. Our Safer Gambling Strategy Team sends regular company-wide communications on progress in the safer gambling area, and there is a particular focus during Safer Gambling Week, with an array of events and talks.
 9. Flutter currently has over 190 employees working in its Safer Gambling Operations Team ("**SG Team**"). The SG Team includes analysts and agents who assess customer behaviour and interact with those customers identified as being at higher risk. All of Flutter's customer-facing employees are given ongoing training on safer gambling risks, starting with a three-week on-boarding course. These include internal training and external courses from organisations such as GamCare. All customer-facing employees therefore have an awareness of safer gambling risks when interacting with customers.
 10. In particular, employees in the SG Team are given in-depth training on how to recognise problem gambling, how to respond to customers who may have said something of concern, and how to probe these comments effectively. The training courses have a particular focus on the skills required to manage difficult conversations with vulnerable customers, and are tailored to focus on the types of interactions our SG Team undertakes day-to-day. The training also deals with how the SG Team can look after their own mental health after dealing with difficult conversations with customers. Customer protection is the key emphasis in all of these training sessions.
 11. Gambling is a leisure activity enjoyed by millions, with a small percentage of people suffering gambling-related harm. We are focussed on identifying and acting in relation to that minority, as set out in the rest of this response to the Report.

Changes since 2021

12. We have made a number of changes to our systems and controls since early 2021, the majority prior to becoming aware that Mr Ashton had taken his own life. Further detail can be found below in our responses to the concerns set out in the Report, but in summary, since 2021, we have:
 - a. introduced, in June 2021, a mandatory net deposit limit, of no more than £1,000 per month, for all customers returning from self-exclusion – anyone returning from a period of self-exclusion undergoes a safer gambling interaction and agrees an appropriate net deposit limit;
 - b. implemented checks with a credit reference agency, at defined levels of spend, to identify where customers are potentially financially vulnerable (including in respect of bankruptcy, county court judgements or the use of short-term loans) – if a customer is found to be potentially financially vulnerable a mandatory net deposit limit is applied to their account;
 - c. updated our predictive safer gambling model, which is based on the behaviours demonstrated by customers who later self-exclude, to include more factors (now totalling 370), including a greater weighting attributable to customers returning from self-exclusion;
 - d. introduced a mandatory net deposit limit, of no more than £500 per month, for all customers under the age of 25; and

- e. imposed a stake limit of £10 on all online slots games.

It is impossible to know if these changes would have affected the tragic outcome in this case, but, as we explain later in this response, the changes set out at (a) to (c) above would have had a significant effect on a customer displaying Mr Ashton's betting activity now.

13. In addition to the changes already introduced since 2021, Flutter is committed to incorporating additional learnings from this case, and has already begun reviewing our controls and procedures to that end. Again, further detail is set out below, but in particular we have:
 - a. updated our "time spent on site" control so that as well as capturing customers who use our products for a significant period of time in any one day, we can identify and escalate cases where customers repeatedly use our products over a longer period; and
 - b. reviewed the patterns of play evident in Mr Ashton's betting activity – such as the 'sawtooth pattern' identified by Professor Forrest – to incorporate learnings from this into future changes to our safer gambling models and controls.
14. Further, you will be aware that the Government issued a white paper on gambling reform on 27 April 2023 – "High stakes: gambling reform for the digital age"¹ (the "**White Paper**"). The White Paper includes significant changes to the regulatory environment in Great Britain, including the introduction of financial risk checks. We will be engaging with the Gambling Commission and the Government, which are both consulting on different aspects of the proposed changes.

Concern 1 – Player Protection Tools

15. Before we address your specific concern in relation to the safer gambling tools made available to customers ("**Player Protection Tools**"), we will briefly summarise the purpose of Player Protection Tools, how they work, and how they fit into our overall customer safety framework.
16. All remote gambling operators licensed in Great Britain must provide customers with a range of tools to help them gamble safely². For example, tools that allow customers to set limits on their deposits or to exclude themselves from gambling. However, as set out in further detail below, Player Protection Tools are just one of a range of customer safety measures we utilise. They are designed to help customers regulate their play and budget, with stronger measures, like safer gambling interactions, undertaken when a customer's risk escalates.
17. The White Paper recognises the important role that "player-centric tools", such as the Player Protection Tools, can play in keeping customers safe. The White Paper also includes a review of such tools within the list of its key policy proposals and includes a plan to consult on and make changes to the use of such tools³:

*"As with other sectors, we want consumers to be empowered to make informed decisions and manage spending. We will take the insights from behavioural science to make player-centric tools better. For instance, the Commission will consult on implementing potential improvements to player-set deposit limits such as making them mandatory or opt-out rather than opt-in, and we will continue work with the gambling and financial services sectors to make customer-controlled gambling transaction blocks as robust as possible."*⁴

18. The White Paper states the following in its conclusion in relation to these tools:

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1153228/1286-HH-E02769112-Gambling_White_Paper_Book_Accessible1.pdf

² <https://www.gamblingcommission.gov.uk/standards/remote-gambling-and-software-technical-standards/rts-12-financial-limits>

³ Ibid, page 13

⁴ Ibid, page 5

“In line with advice from the Gambling Commission, we believe player-centric controls such as pre-commitment tools and activity statements can be strengthened. The Commission will consult on requiring operators to improve these tools, such as by making deposit limit setting mandatory for all customers on account creation and pre-populating the limit with a reasonable default. It is also possible that other tools, such as the provision of clear information on annual and/ or account lifetime losses could be improved, for instance by being more accessible. The Commission will explore this further through a consultation to consider best practice on the design and use of player-centric tools before mandating implementation.”⁵

19. There are a range of Player Protection Tools that are available to Betfair’s customers. An overview of the Player Protection Tools that were available to Mr Ashton are set out in the table below:

Player Protection Tool	Description
Deposit limit	A customer can set a limit on their deposits over a set time period
Loss limit	A customer can set a limit on their losses over a set time period
Time Out	A customer can take a short break of up to 30 days from our products during which time they cannot place any bets
Reality check	A customer can set an interval-based reminder of the length of time they have been playing
Self-Exclusion	A customer can completely block their account (for all products or just selected products) for longer periods of time, starting at six months and for up to five years. Customers can alternatively choose to permanently exclude from all or selected products. If they choose to permanently exclude from all products, their account will be closed and cannot be reactivated or re-opened

20. The use of Player Protection Tools is actively encouraged across Flutter’s entire customer base. The tools are widely promoted in our marketing campaigns (broadcast, display and digital) and on our social media channels. We strongly believe the use of Player Protection Tools is a positive behavioural indicator and that their use can help customers enhance awareness of their gambling activity and stay in control of their gambling. In fact, Flutter has a company-wide goal, linked to employee bonuses, to significantly increase the share of customers using Player Protection Tools. As of 31 July 2023, over 37% of Betfair’s customer base were using a Player Protection Tool, an increase from 21% of the customer base as of 31 July 2021. Whilst the use of Player Protection Tools has been steadily increasing across the industry in recent years as a result of the focus on safer gambling measures, Flutter has also taken steps to help increase their use amongst its customers. For example, when registering an account with Betfair, all new customers are required to set a deposit limit. The percentage of customers using Player Protection Tools far exceeds the small percentage of problem gamblers, highlighting the need to consider a variety of data inputs in any risk model.

21. In addition to the Player Protection Tools on Flutter’s websites and mobile applications, tools and services are available from third parties to help customers stop gambling altogether:

- a. GAMSTOP: this is a multi-operator self-exclusion scheme that enables customers to simultaneously self-exclude from all operators licensed in Great Britain.
- b. Banks and other payment providers: many UK retail banks, including all of the top five, offer customers the ability to opt-in to gambling blocks to prevent payments for gambling services.
- c. Gambling blocking software: Services such as Gamban and BetBlocker allow customers to block access to gambling apps and websites on mobile devices.

⁵ Ibid, page 59, paragraph 97

Links to websites offering such tools and services are actively promoted on Flutter’s websites and mobile applications.

22. We note your concern that our Player Protection Tools are not adequate to protect “a problem gambler with a worsening problem” and that “such tools do not amount to any or any meaningful interaction with the gambler, or any intervention into the practices of the gambler”. Player Protection Tools are intended and designed to help customers control their gambling, which is the case for the vast majority of our customers who use these tools. They are, therefore, different from the interactions we carry out with customers.
23. As we explain in further detail in the next section (in relation to ‘Concern 2’), the trigger for interventions by Flutter, including for a human interaction, is dependent on an assessment of risk by our risk models. While we actively encourage all customers to use Player Protection Tools, we send safer gambling awareness emails tailored to a customer’s behaviour and the risks associated with the customer’s activity. The emails, which focus on education, highlight any changes in the customer’s gambling, as well as including details of the Player Protection Tools most appropriate to them. These safer gambling awareness emails are sent to customers that are deemed to be “low risk”.
24. Where a customer is deemed to be at a higher risk, that customer receives a “safer gambling interaction”, essentially a discussion with one of our trained staff from the SG Team. Between 1 January 2021 and 31 May 2023, our SG Team carried out 220,000 safer gambling interactions on Betfair alone. There are a number of actions we take after assessing a customer as higher risk, including suppressing marketing, exclusion from products, account suspensions, account closure (effectively enforced exclusion), and recommendations to use GAMSTOP (the industry-wide self-exclusion service).
25. Our evaluation of the latest Remote Customer Interaction Guidance from the Gambling Commission⁶ (issued in June 2022 and due to come into effect on 31 October 2023) is that we are expected to interact with no less than 6.8% of Betfair’s customers (taking into account the problem gambling rates for the relevant gambling activities). In its Remote Customer Interaction Guidance from July 2019, the Gambling Commission stated that “there are a number of ways for you to interact with your customers, including email, telephone calls, live chat or pop-up messages”. During 2021, Betfair interacted with 11.5% of its customers, almost double the expected rate under the 2023 guidance, and 2.1% of customers had a “human interaction” or enforced action in lieu of a completed interaction (e.g. a limit applied on their account).
26. The Health Survey for England 2018⁷ (the “**2018 Health Survey**”) is the current source of official statistics on problem gambling rates used by the Gambling Commission⁸. The 2018 Health Survey estimated that 0.93% of gamblers could be defined as “problem gamblers”, amounting to 0.5% of the overall population⁹. Phone surveys undertaken by the Gambling Commission over the last 2 years estimated problem gambling rates in the range of 0.2% to 0.3%¹⁰.
27. On the subject of problem gambling rates, the inquest heard (from Professor Forrest) that the betting exchange is a product where, compared to “standard betting” (i.e. on a sportsbook), “a much higher proportion of customers were likely currently to be having problems with their gambling”. We heard a similar suggestion subsequently made at the Culture, Media and Sport Select Committee on 11 July 2023, where betting exchanges were said to have an “addiction rate” of 18%. These assertions appear to be based on an interpretation of results from the 2018 Health Survey, which shows estimated rates of problem gambling for people who participate in certain betting and gaming activities. However, these statements appear to be based on a misreading of results from the 2018 Health Survey, which estimated that 9.3% of

⁶https://assets.ctfassets.net/j16ev64qvf6l/4FF9PUgKMhXELzhIdTQIR5/da6f3ec33952e2325dacc5a862688638/Remote_Customer_Interaction_Guidance_Remote_gambling_licensees_June_2022_-_not_in_effect.pdf

⁷ <https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2018>

⁸ “The Gambling Commission’s most robust sources of statistics on the prevalence of problem and at-risk gambling are the national health surveys” and the 2018 Health Survey contains “the latest health survey data”: <https://www.gamblingcommission.gov.uk/about-us/guide/page/gambling-behaviour-2022-problem-and-at-risk-gambling>.

⁹ 54% of the population in England gambled in 2018 and 0.5% of the population “reached the threshold to be considered experiencing problem gambling” (<https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2>).

¹⁰ <https://www.gamblingcommission.gov.uk/about-us/guide/page/gambling-behaviour-2015-to-2023-incidence-of-problem-gambling-short-form>

people who participated in exchange betting were PGSI “problem gamblers” and 8.6% were PGSI “moderate risk” gamblers. Importantly, neither classification denotes “gambling addiction” or, to use the clinical term, “gambling disorder”. We note that “moderate risk” gamblers are defined in the PGSI as people “who may or may not have experienced adverse consequences from gambling”, while “problem gamblers” are defined as people “who have experienced adverse consequences from their gambling, and may have lost control of their behaviour”. These classifications are clearly distinct from “gambling disorder”, which is defined by the American Psychiatric Association (in the DSM-5) as follows: “The essential feature of gambling disorder is persistent and recurrent maladaptive behaviour that disrupts personal, family and/or vocational pursuits”.

28. Notably, the 2018 Health Survey shows a problem gambling rate of 0.0% for people whose only form of online gambling was betting exchanges. The data shows¹¹ that it is only when betting exchange customers engage in multiple other forms of gambling, including spread betting, that a minority may then be classified as problem gamblers. We do not therefore believe it is reasonable to conclude that a betting exchange customer is higher risk based on the 2018 Health Survey. In the case of Mr Ashton, who had excluded from gaming products, almost the entirety of his betting activity on Betfair was on the betting exchange. Information on how Betfair’s betting exchange works is set out in the Appendix.
29. The analysis of the 2018 Health Survey data in relation to the problem gambling risk associated with betting exchanges is consistent with the analysis of our own data. Betfair is the world’s largest betting exchange, and we have access to a very large set of data points that consistently demonstrate that betting exchange activity is materially lower risk when compared to other gambling activities. For example, Betfair’s exchange customers have a self-exclusion rate of 1.7%; this is half the self-exclusion rate of Betfair’s sportsbook customers.
30. In conclusion, we believe that Player Protection Tools play an important role in empowering customers and helping them to exercise control over their gambling. We will engage constructively with the Gambling Commission’s consultation in this area to help to strengthen and improve player-centric tools. We will also separately continue to work on strengthening and improving our Player Protection Tools and continue to actively encourage the use of these tools by all of our customers.

Concern 2 – The Algorithm

31. Again, before we address your specific concern in relation to our algorithm, it may be helpful to briefly summarise how Flutter’s safer gambling models operate.
32. We use a machine-learning algorithm to assess the gambling activity and behaviour of hundreds of thousands of our customers every day. We have to take a data-driven, risk-based approach when evaluating risk and identifying customers for interaction, as simple thresholds alone would not be helpful in identifying customers actually at risk and would generate an unmanageable volume of false positives. The challenge for Flutter, and indeed for all gambling operators, is to ensure that our safer gambling controls and models are as effective as possible in identifying customers that are experiencing, or that may be at risk of experiencing, gambling-related harm. Whilst no system can guarantee that every person that is at risk of experiencing gambling-related harm will be identified, protecting our customers from gambling-related harm is our biggest priority.
33. Our algorithm-based system was first introduced almost a decade ago, to both monitor harmful play and provide predictions on the likelihood of future risk. Our safer gambling teams continually monitor the effectiveness of our controls, regularly making changes to optimise their effectiveness. During this period we have seen significant and continuous improvements¹². Our models combine the use of predictive

¹¹ Albeit that relatively small sample sizes are used in the 2018 Health Survey.

¹² Flutter uses a Transactional Risk Indicator Score (“TRI”) to measure the percentage of revenues in a year from customers who subsequently go on to self-exclude (either directly with a Flutter brand or via GamStop) in that particular year. The reason for selecting this metric is that it can be applied across all customer revenue, and it has a strong correlation with PGSI scores (which by their nature can only be collected on a small sample basis). Each year Flutter targets a material reduction in TRI on a like-for-like basis vs. the previous year. As reported in Flutter Entertainment plc’s most recent Annual

controls and reactive behavioural controls, as well as financial and behavioural back stops tailored to a customer's age.

34. Our safer gambling framework includes both proactive and reactive controls, focusing on behavioural and transactional risk indicators. There are two key elements to these controls: the predictive Customer Activity Awareness Programme (“CAAP”) model, and a reactive reporting suite. The two work in parallel to identify customers who may be at risk of experiencing gambling-related harm who are then assessed in more detail by members of the safer gambling team:
- a. The predictive CAAP model currently monitors 370 data attributes every day for every customer and compares each customer's behaviour to the patterns of behaviour of historical customers who later went on to self-exclude. Self-exclusion is a commonly used proxy for 'problem gambling' and allows us to predict the likelihood that a customer will experience gambling-related harm and intervene at an early stage.
 - b. Our reactive behavioural controls monitor customers, looking at their patterns of play against known markers of harm, such as spikes in deposits, stakes, time on site and overnight play.
35. Mr Ashton did not demonstrate many of the characteristics of customers who have issues with their gambling. For example, he:
- a. almost exclusively used the Betfair Exchange which, as mentioned previously, is statistically the lowest risk gambling product (problem gambling rates are higher for those who use gaming products, and Mr Ashton had excluded from gaming in 2017);
 - b. never asked for free bets, complained to customer services, or used multiple payment methods (all of which can be signs of a problem gambler);
 - c. had minimal deposit volumes (on average, he deposited 1.5 times per week in the relevant period) and minimal methods for depositing; and
 - d. had a balance (i.e. a positive cash amount) in his Betfair account for extended periods of time.
36. For a number of reasons, including those set out above, Mr Ashton was classified as “low risk” by our safer gambling models. This meant that he received tailored safer gambling awareness emails when his gambling activity changed, rather than a “human interaction”, which an individual with a higher risk score would have received. Mr Ashton's betting activity - including time spent on site, number and frequency of bets, and losses - were not remarkable when set against the rest of the Betfair Exchange customer base. Customers who bet on the Betfair Exchange are typically more sophisticated gamblers and can often place significant volumes of “back” and “lay” bets, often on the same markets.
37. We are constantly evolving and improving the CAAP model. For example, in 2022 we made a number of improvements to the operation of CAAP, including adding:
- a. additional features incorporating inputs from a more diverse range of data sources across Flutter, including CRM data, customer service contacts, and more granular data relating to customer activity;
 - b. metrics which compare customers' short-term activity to their longer-term average, and comparing their recent behaviour against their usual behaviour; and
 - c. features which ensure a customer's self-exclusion history influences their risk score.

38. The CAAP model is regularly updated as new data becomes available to us and we build an ever deeper understanding of patterns that can indicate heightened player risk.
39. Our data science teams are currently analysing the behaviours outlined by ██████████ in his report to assess whether any of these should be included in future iterations of our control framework (to the extent that they are not already included). By way of example, we have been looking at the “sawtooth” pattern of play and the deposit limit changes that were seen in Mr Ashton’s case to assess how they can be separated out from similar behaviour present in non-problem gamblers.
40. More specifically, and as mentioned above in the Introduction, we know that a customer in Mr Ashton’s circumstances – and repeating the same betting patterns - would be treated differently today due to specific improvements that have been made since early 2021. These include:
- a. the imposition of a mandatory net deposit limit (that cannot be changed by the customer) of no more than £1,000 per month on every customer who returns from self-exclusion. For 96% of customers returning from a self-exclusion, we set this deposit limit at £500 a month or less (based on a review with the customer of their situation and affordability); and
 - b. ‘Financial Vulnerability Checks’ when a customer reaches defined net deposit thresholds. These checks are performed using a third-party credit reference agency to search for a history of bankruptcy, county court judgements, short-term loans and other markers of financial vulnerability. Looking back at Mr Ashton’s betting history during the period in question, such checks would have been undertaken on Mr Ashton on three separate occasions, and would potentially have led to the imposition of a net deposit limit of between £100 and £1,000 per month, depending on the outcome.
41. In terms of Mr Ashton’s betting activity, the changes described in the paragraph above would have significantly reduced his losses in Spring 2019 and March 2021.
42. To summarise, although our safer gambling models at the time categorised Mr Ashton as being at “low risk” of being likely to suffer gambling-related harm, we have made a number of changes to our controls since 2021 that mean it would be impossible for a customer in Mr Ashton’s situation to repeat the same pattern of losses today.

Concern 3 – Industry (Regulatory) Standards

43. As a licensed operator, we are required to meet strict regulatory standards pursuant to our licence from the Gambling Commission. These regulatory standards, and in particular the social responsibility obligations contained in the Gambling Commission’s Licence Conditions and Codes of Practice (“LCCPs”), are principle-based and outcome-based expectations for the protection of individuals. Flutter Entertainment plc holds many gambling licences across the world and engages with over 40 regulators globally. Our consistent experience is that British gambling regulation is one of the most developed frameworks globally, with the Gambling Commission one of the global industry’s most widely-respected regulators.
44. Contrary to assertions made during the inquest, there is no specific “minimum standard.” Neither does an objective measure of “good” or “best” practice exist. Instead, gambling operators put in place controls designed to comply with the LCCPs. The Gambling Commission, in its role as regulator, carries out regular inspections of its licensees to ensure compliance with LCCPs, and also recommends areas for improvement based upon its learnings from across the industry. Where it believes a licensee is not complying with the LCCPs, the Gambling Commission takes action, including in the form of improvement notices, the “special measures” process, regulatory settlements, fines and licence suspensions.
45. Flutter takes its responsibility to protect our customers very seriously. We always aim to go beyond mere

compliance with regulatory standards. For example, we are involved in the industry data sharing project, GamProtect, which is a pilot aimed at sharing details of some of the highest risk customers across major operators. All of our UK-facing brands – Betfair, Paddy Power, Sky Betting & Gaming, and tombola – are rated ‘Advanced Level 3’, which is the highest level possible, by GamCare (the leading independent assessor of safer gambling standards).

46. We also lead the industry in introducing new controls. For example, in 2021 we became the only operator to proactively introduce a £10 stake limit on online slots games across our brands: an approach which has recently been included in the White Paper recommendations. In 2022, Flutter also mandated a strict maximum monthly net deposit limit of £/€ 500 for all customers under the age of 25 in the UK and Ireland. Using internal and external data, we established that younger customers can experience higher levels of problem gambling rates compared to older customers. Our assessment of the data demonstrated that younger people can be more vulnerable to experiencing gambling harm due to a number of factors, such as achieving independence from their parents and leaving the family home, increased financial independence coupled with lower levels of discretionary income, and the broader societal impacts that come with change in lifestyle such as working, attending university, and increased use of social media. As such, we challenged ourselves to go further in protecting our younger customers during this time of change, and we became the first operator to mandate maximum deposit limits as an additional safety net for our younger customers.
47. Accordingly, in our view, if there is any “best” practice in gambling regulation anywhere in the world, it is the work we are doing, along with other major operators and regularly discussed with the Gambling Commission, in the British market.
48. It is important to note that customer safety is a constantly evolving area. There will always be more that we can learn and, as a result of Professor Forrest’s report into Mr Ashton’s patterns of play and our own review of Mr Ashton’s gambling activity, we pro-actively made some changes ahead of the inquest, which included:
 - a. Time Spent on Site Escalation Control: We made improvements to our ‘Time Spent on Site’ control designed to capture where the duration of a customer’s play could be a cause for concern. We have strengthened this control to ensure that its focus is broader than isolated sessions of a significant amount of time. The improved control now also identifies customers who spend a more moderate amount of time on site, but do so on repeated occasions. Where a customer triggers the relevant threshold, they are escalated for a human review of their activity. We are also exploring how we can make further improvements in this area. For example, we are looking at displaying time spent on site to both our customers and our customer service agents, and enabling the ability to set maximum session caps (in addition to the Reality Check tools we already have in place) in order to increase customer awareness and the effectiveness of our interventions.
 - b. Backdating Self-Excluded returner limits: In June 2021, we introduced a deposit limit for customers returning from self-exclusion. This limit is mandatory and set at a maximum of £1,000 per month for over 25s, and £500 per month for those under 25. When we initially introduced this control, it was a forward-looking control applied to customers who *subsequently* returned from self-exclusion. However, with additional data now available, we have since updated this control to any account returning from self-exclusion from 1 November 2019 onwards. This led to us applying the maximum mandatory deposit limits set out above to an additional 6,000 customer accounts, who returned from self-exclusion between November 2019 and July 2021.
49. Finally, we note the following in respect of British gambling regulation:
 - a. the LCCPs, particularly around customer interaction, have changed since the period in question, materially strengthening customer protections;
 - b. the Government has, over the last three years, undertaken the most detailed review of gambling policy and regulation in almost 20 years, and proposed a significant number of changes, many designed to further increase customer protections, in the very detailed White Paper; and

- c. the Gambling Commission is now consulting on those proposed changes with the aim of introducing specific changes in the next one to two years.

Conclusion

50. The safety of our customers is of utmost importance to us. It is a core part of the mission, strategy and values of Flutter, which are communicated to all employees on joining, and discussed and re-committed to on a regular basis in internal communications by our CEO and senior leadership teams. Our safer gambling strategy is something we have consciously challenged all our colleagues to live and breathe on a day to day basis, and is constantly driven forward by over 300 colleagues in our dedicated Customer Safety Tribe. We are committed to operating to the highest standards in the industry and to continuing to improve our safer gambling controls to protect our customers from gambling-related harm. We will continue to work with the Government, the Gambling Commission, acknowledged experts in this area and others in the industry to ensure that our services are as safe as they can be for our customers.
51. We hope this response is helpful in explaining the work Flutter is doing related to the concerns raised in the Report and sufficiently addresses them. If, however, further information or clarification would be of assistance, we will, of course, endeavour to assist.

Yours faithfully

Flutter UK & Ireland

APPENDIX

Flutter

1. Headquartered in Dublin, Flutter Entertainment plc is the world's largest online betting and gaming business. Listed on the FTSE 100 in the United Kingdom and Euronext Dublin in Ireland, Flutter Entertainment plc holds many gambling licences across the world and engages with over 40 regulators globally. It has more than 20,000 employees and over 12 million active customers across the globe, around 4 million of whom are in the UK and Ireland.
2. We operate a number of brands in the UK and Ireland: Betfair, Paddy Power, PokerStars, Sky Betting & Gaming, and tombola.

Betfair and the Exchange

3. Betfair offers a range of online betting and gaming products. The gaming products include online versions of casino games (such as roulette and blackjack), online slots, poker and bingo games. For sports betting, Betfair offers two main betting products – a sportsbook ("**Sportsbook**") and a betting exchange ("**Exchange**").
4. The Sportsbook is the traditional fixed odds betting product and will be very similar to the bookmaking services offered by other UK bookmakers. On the Sportsbook, a customer can place bets on a wide range of sporting events at odds set by Betfair's trading team. Betfair is the counterparty to bets placed on the Sportsbook. If the customer wins his bet, Betfair will pay the customer his winnings (based on the odds taken by the customer and the customer's stake). If the customer loses the bet, Betfair keeps the customer's stake.
5. The Exchange allows customers to bet against each other, rather than against a traditional bookmaker. This means that, unlike when betting with a traditional bookmaker, customers on the Exchange can both 'back' a particular selection to win and 'lay' a particular selection to lose. In the case of a 'lay' bet, this means that the customer laying the bet will win their bet if the relevant selection does not win. For example, a customer 'backing' a particular horse to win a race will be betting against one or more customers that are laying that horse to not win the race.
6. While in traditional bookmaking, the bookmaker's profits come from a margin built into the odds, Betfair's profits on the Exchange come from a small percentage commission paid by the customer on winning bets. The fact that there is no profit margin built into the odds by Betfair means that customers can typically obtain better odds with Betfair on the Exchange than with traditional bookmakers (including Betfair on the Sportsbook). This, together with the ability to lay bets, tends to attract more sophisticated customers. Furthermore, customers might seek to place both 'back' and 'lay' bets on the same event so as to guarantee a win whatever the result of the sporting event, much as a share trader might try to profit from both a rising and falling share price.