REGULATION 29 RESPONSE TO A REPORT ON ACTION TO PREVENT FUTURE DEATHS

Please do not include any living person names in this document, in accordance with the Chief Coroner's publication policy PDF.

THIS RESPONSE IS BEING SENT TO:

The Coroner, Emma WHITTING for the Coroner Area Bedfordshire and Luton Coroner Service in response to a '**REPORT TO PREVENT FUTURE DEATH REGULATION 28**' following an investigation into the death of **Stephen John GOFF**, and an inquest that concluded on **14 July 2026**.

1.	**RESPONDENT** In line with our duty under Regulation 29 of the Coroners (Investigations) Regulations 2013, [redacted] provides this response within 56 days of the date of the Report to Prevent Future Deaths or any extension granted.
2.	**DATE OF RESPONSE** October 05, 2026
3.	**CONFIRMATION OF CORONER'S MATTERS OF CONCERN** The **MATTERS OF CONCERN** were identified in the report are as follows: 1. Whilst the Deceased had successfully excluded himself from gambling with all licensed operators in Great Britain via GAMSTOP, this had not excluded him from gambling on-line with the National Lottery Draw because, at the time and currently, consumers, even when participating in the National Lottery Draw on-line, are not protected by the GAMSTOP scheme but only through the conditions imposed by the Fourth National Lottery Licence which requires a consumer to complete a separate self-exclusion process; 2. Despite self-excluding from all on-line licensed gambling operators in 2018 and again in 2024, the Deceased continued to gamble on-line with the National Lottery Draw and, indeed, his last bank payment from his almost depleted bank account prior to his death was to the National Lottery Draw; 3. By not including on-line gambling with the National Lottery Draw in the GAMSTOP scheme, there is a risk that those having self-excluded via GAMSTOP will still gamble on-line with the National Lottery Draw.

4.	**DETAILS OF ACTION TAKEN,** how has the concern been addressed. [If no action is proposed please explain why here. If you feel that the response should not have been sent to you, please state this]. *Any links to webpages included in the response will not be checked for sensitive information prior to publication, as the information is already online.* 1. I am the acting Chief Executive Officer of the Gambling Commission ("the Commission"). I write in response to the Regulation 28 Report to Prevent Future Deaths ("the PFD") dated 10 August 2026. 2. The Commission and I wish to reiterate our sincere condolences and deepest sympathies to Mr Goff's family following their tragic loss. 3. In line with our statutory duty under the National Lottery etc. Act 1993 to ensure that the interests of every participant in the National Lottery are protected, we are committed to taking all appropriate and proportionate regulatory action in relation to the matters of concern raised. I hope that the contents of this response will aid the Coroner in understanding what action has been taken since the PFD was received, alongside identifying future work that we plan to undertake to address the matters of concern raised by the Coroner. 4. The Commission's letter to the Coroner dated 21 July 2026 set out why Gamstop does not currently apply to National Lottery online draw-based games ("DBGs"). Although National Lottery online DBGs are not currently covered by Gamstop, National Lottery online interactive instant win games ("IIWGs") are covered by Gamstop. 5. While the rationale and evidence regarding the scope of Gamstop in relation to the National Lottery is well-grounded, we recognise the tragic circumstances that have given rise to the matters of concern. 6. As a result, since the PFD was issued, the Commission has been engaging with Gamstop and the National Lottery licensee, Allwyn Entertainment Limited ("AEL"), to understand both the options that are available and the practical steps that would be required to be undertaken in order to increase protections for National Lottery players. Details of this engagement have been set out below. All parties are fully committed to working at pace to determine the most effective route forwards, with a focus on ensuring suitable safeguards are in place for consumers. **Engagement with AEL and Gamstop since 10th August 2026** 7. Outside of the Gamstop system, AEL provides a number of other ways for National Lottery players to limit their play. These measures are complemented by a range of other controls focussed on participant protection, which have already been significantly improved since the time-period covered by the scope of the Coroner's inquest. As examples, since January 2026, the behavioural monitoring and interventions programme which is in place for online National Lottery players has been: a. extended to cover all National Lottery online DBGs play as well as National Lottery IIWGs play (previously National Lottery IIWGs only), and; b. improved so risk assessments of online National Lottery players are conducted daily (previously monthly), with any players who are identified as being 'high-risk' then entering a targeted weekly

intervention programme which also considers financial vulnerability, with a focus on driving changes in play behaviour.

8. Accordingly, the engagement we have undertaken since the PFD was issued has focused on identifying further actions that we anticipate would be both proportionate and suitably effective in ensuring appropriate protections are in place for National Lottery participants.

9. The options we have identified to date are:

    a. maintain the current position of Gamstop not extending to National Lottery online DBGs;

    b. maintain the current position but focus on ensuring additional controls are implemented to ensure that National Lottery players are better protected. This could, for example, involve greater signposting to the relevant sections of the National Lottery website for Gamstop-registered consumers;

    c. extend the scope of Gamstop to include National Lottery online DBGs via a blanket approach, meaning that if a consumer registers with Gamstop, they will be automatically excluded from all forms of licensed remote gambling, National Lottery IIWGs *and* National Lottery online DBGs, or;

    d. extend the scope of Gamstop to include National Lottery online DBGs on an optional basis, i.e. with consumers presented with the option to either:

        i. include only National Lottery IIWGs within the scope of their Gamstop registration, or;

        ii. extend the scope of their Gamstop registration to also include National Lottery online DBGs.

10. With reference to the options outlined at paragraphs 9c and 9d above, it is important to emphasise that there are several complex factors to consider before we can determine the most appropriate solution for consumers. To put that in context:

    a. adopting the ‘blanket’ approach at paragraph 9c would require careful consideration, as there is a risk that by including National Lottery online DBGs within the Gamstop scheme, consumers could be disincentivised from registering. We would also need to determine the appropriate treatment for consumers who had previously registered for the Gamstop scheme on the basis that it would apply only to National Lottery IIWGs only, and;

    b. adopting the ‘optional’ approach at paragraph 9d would require careful consideration of the appropriateness of offering such choices to consumers in the context of them seeking to register with the Gamstop scheme.

11. An initial assessment suggests that either of the options outlined above at paragraphs 9c or 9d would require coordinated changes across Gamstop, AEL, the Commission and relevant third-party suppliers. It is therefore appropriate to undertake a robust impact assessment before determining a final position. The scope of this assessment would include a fuller analysis of the benefits and risks associated with each option, along with suitable considerations regarding consumer communications, operational

	readiness, testing and assurance. Any technical changes would also need to be considered in the context of AEL's planned technology roadmap, not least on the basis that if the extension of the scope of the Gamstop scheme (in some form) is prioritised, this may have an impact on the timing of other initiatives AEL has planned in relation to the protection of National Lottery participants. 12. Both options at paragraphs 9c and 9d are also likely to have significant cost implications, in terms of the costs to implement the solution and an increase to the annual fees which AEL is required to pay to Gamstop. This, in turn, would impact on the level of Good Causes Contributions generated by the National Lottery, given the financial mechanics of the Fourth National Lottery Licence. While this is not inconsequential, it is important to reiterate that the Commission's primary focus in the context of this matter is, in line with the ordering of our statutory duties, on ensuring that appropriate protections are in place for National Lottery players. 13. We are therefore committed to continuing to work closely with Gamstop and AEL to define and then ensure the effective implementation of the most appropriate solution. Our future plans are detailed further within section 5 below.
5.	**DETAILS OF FURTHER ACTION PROPOSED** *Any links to webpages included in the response will not be checked for sensitive information prior to publication, as the information is already online.* 1. Given the approach we intend to pursue in relation to this matter and the complexities associated with determining the most appropriate option in response, further work is needed before a more conclusive position can be reached. The nature of the work means that completion of it will not be possible within the 56-day response period prescribed by Regulation 29 of the Coroners (Investigations) Regulations 2013. 2. Working jointly with Gamstop and AEL, we are therefore proposing to undertake (and indeed, have already commenced) a structured 'Discovery' phase focussed upon developing a full understanding of: a. the scale of the issue and / or risks which are present based on the current policy position; b. the resource, timing, costs and deliverability of the options we have identified, including the impact on other planned deliverables, and; c. informed by 'a' and 'b', the relative merits of each of the options we have identified. 3. In support of the above, the parties have already commenced analysis which will enable us to collectively reach a well-informed, evidence-led decision. In parallel, and in the shorter term, AEL is proactively reviewing the application of its behavioural monitoring and interventions programme in relation to Gamstop registrants, identifying any opportunities for further enhancement as part of its ongoing commitment to participant protection. If opportunities for enhancement are identified, these will be implemented as soon as is possible. 4. We expect the broader 'Discovery' phase to conclude within 12 months, following which we will determine: a. whether further actions (i.e. including, but not limited to the options

	described at paragraphs 9b, 9c and 9d in section 4 of this response) are proposed for implementation and; b. the associated implementation timetable. 5. As part of this work, the parties involved will assess the effectiveness, impact and learnings arising from any enhancements implemented by AEL in the interim, ensuring that any decisions are informed by a robust and evidence-led understanding of the issue. 6. If the evidence gathered during this period leads the parties to a clearer understanding of the most appropriate solution for consumers earlier than the timetable indicated at paragraph 4 above, then we will not hesitate to take the appropriate action sooner.
6.	**SIGNATURE** 