

ESG Gaming,
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ESG
Gaming

Sent via email only: [REDACTED]

[REDACTED]
GambleAware
5th Floor, Lincoln House
296-302 High Holborn
London
WC1V 7JH

03 October 2023

Dear [REDACTED]

System Stabilisation Fund: ESG Gaming

Thank you for responding to my letter dated 28 September. We would welcome an opportunity to discuss our proposal for the above fund and appreciate your support. In preparation for that discussion, I have worked with our board, accountants, and partners to offer some thoughts and additional evidence organised around your helpful Outcome letter dated 26 September. In addition, and based on this evidence, we'd like to ask if (i) our proposal can be reconsidered or (ii) if a grant of £158,802 can be considered, given our current position and your desire to offer assistance to organisations affected. If the latter is an option, we will look to reapply to the System Stabilisation Fund for a grant of £132,472 at the next round.

We have structured this letter following the format of your helpful feedback on our proposal.

There is insufficient evidence that your funding has been disrupted.

The application deadline for this fund fell during our year-end account preparation. Your colleague Dave Stannard contacted our accountants, Crowe UK LLP, to seek clarification on the presentation of our year-end accounts. The questions from Dave were answered satisfactorily in an email exchange on 30 August: [REDACTED]

Though our year-end accounts to 31 July 2023 showed an overall year-end capital and reserves of £183,381, this was due to ESG Gaming receiving and banking the income from a successful and restricted Regulatory Settlement nineteen days before year-end on 12 July 2023. The restricted Regulatory Settlement was for £223,580, which did affect our year-end results, given it was banked within a few days of 31 July 2023.

ESG Gaming is a trading style of ESG Corporate Community Interest Company, Registered Trademark: UK00003764602

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Company Registration Number: 13566221 | VAT registered number: 391 4171 96 | Corporation Tax reference number: 75315 26940
Apprenticeship Gateway, account ID: JNK6NK | UK Register of Learning Providers: UK Provider Reference Number (UKPRN): 10091637



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Confirmation of this Regulatory Settlement was received from the Gambling Commission on 24 May: [REDACTED] ESG Gaming was matched to an operator, and the Settlement was paid on 12 July: [REDACTED]

If we were not fortunate enough to receive the restricted Regulatory Settlement, our year-end accounts, instead of showing £183,381, would have read (£40,199). We have provided an analysis of our Balance Sheet showing these two scenarios: [REDACTED]

While preparing our year-end accounts and throughout the external accounts examination process, we considered how we might show the restricted Regulatory Settlement, given that the funding was banked within a few days of year-end. With our accountants, Crowe UK LLP, we reviewed FRS 102 Section 24, which you'll be aware sets out the requirements for reporting grants from the government or government agencies. We considered it reasonable to show the Regulatory Settlement income as being received entirely, which is a true reflection of events. Given its restricted nature, we will account for this expenditure in our 2023/24 year-end accounts as a separate, restricted item. In addition, we did note in our year-end accounts on page nine how we would treat such funding in the future, and we noted the purpose for this particular restricted grant on page ten: [REDACTED]

Additionally, as noted in our proposal, ESG Gaming has not received any RET funding this calendar year. Our last RET donation was for £62,400, banked in December 2022.

Finally, since we made our proposal eight weeks ago to GambleAware, we have learned that Entain and Les Ambassadeurs, two operators whom we had on our fundraising pipeline, are now contributing to GambleAware. An example of this communication can be viewed by:

[REDACTED] This affects our Going Concern statement within our year-end accounts on page nine.

Therefore, we would like you to reconsider this additional evidence of how our funding has been affected.

Support existing projects / New delivery or enhancement projects.

Our proposal to the System Stabilisation Fund was wholeheartedly based on supporting the principle work of ESG Gaming and not for 'new or enhanced delivery'. ESG Gaming is listed as an organisation that can receive RET donations for Prevention and Research: [REDACTED] and our organisation is also listed as a partner to the previous National Strategy to Reduce Gambling Harms: [REDACTED] Therefore, we would ask you to reconsider if ESG Gaming is an existing and recognised organisation in the eco-system.

We attempted to set out in our proposal the work we had undertaken to (i) understand the market to ensure the work of ESG Gaming was not duplicating other services, (ii) understand the evidence base, trends and research gaps, and (iii) develop our Theory of Change to understand the outcomes and outputs of ESG Gaming. Setting out this work was essential to give confidence that we had invested the time to secure our foundations and were approaching our work in an organised and evidenced-based manner. Not only do we want to deliver services for parents and vulnerable people, but through this work, contribute to the broader knowledge base for emerging technology and its impact on gambling behaviours among the population.

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To evidence that ESG Gaming is not a new organisation, we have been publishing our board meeting papers on our website since July 2022, which give an account of the steps we have taken to establish the governance arrangements, foundations for ESG Gaming and our work completed over the past fourteen months: [REDACTED]

Finally if our original proposal cannot be reconsidered, to support our request of a grant to the value of £158,802 we have reattached the SSF spreadsheet showing essential expenditure to 31 December 2023. If approved, we would look to submit a further proposal to the SSF in November. To view the SSF spreadsheet detailing the £132,472 grant, please: [REDACTED]

We hope this letter is helpful and that there might be an appetite to reconsider how we work together. Thank you so much for your time, and I look forward to hearing from you.

Best wishes



Lee Willows

Exec Chair & Founder

For and on behalf of ESG Gaming

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