Entain ARC machine-learning player protection

IMPLEMENTED 2021 ONWARDS · MEDIA AND PUBLISHING · UK · BAND C · CLAIMED ONLY
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A betting and gaming group uses machine-learning models to score customers for gambling-harm risk and prompt interventions, in a programme it calls ARC. The figures come from Entain. In 2022 the UK regulator reached a £17 million settlement with the group over safer-gambling and anti-money laundering failures; its statement does not mention ARC.

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NOTICE WORDING LAST UPDATED 16 NOVEMBER 2026

AT A GLANCE

AI used: Machine-learning risk models that score customers for gambling harm and trigger interventions.

Implemented: 2021 onwards. Grade: band C, Process change, Claimed only.

Headline result, as reported: ARC delivered 8.7 million player-protection interventions in 2023, up 98% on 2022, by Entain's account

1 · The case

The facts, as reported by the 4 sources listed at the end. Where a source is silent, the field says "Not reported".

Organisation

Entain plc. Listed international betting and gaming group (brands include Ladbrokes, Coral and Foxy Bingo in Great Britain). Licensed in 34 jurisdictions in December 2023, per iGaming Business. Headcount: Not reported in the sources. Canvas block: 8. Governance and risk. Also 4. Operations and process, 3. Customers and proposition.

Business challenge

The challenge. Entain says keeping customers safe and playing within their means will always be its number one priority. In August 2022 the UK Gambling Commission announced a £17 million settlement with Entain over social responsibility and anti-money laundering failures, including being slow to interact with, or not interacting with, certain customers at risk of harm. The Commission's chief executive said this was the second time the operator had fallen foul of the rules. The Commission's statement does not mention ARC.

How it was addressed. Entain developed ARC, which its 2022 annual report describes as a technology-led safer betting and gaming programme using AI to monitor customers in real time and prompt interactions when risk rises. Its protector model uses 26 markers of protection. Per iGaming Business, ARC uses three AI-based models to assess risk and can recommend limits, flag unusual deposits, long sessions and large withdrawals, and offer treatment programmes. Entain's current player protection page says the tools were jointly developed with independent third-party experts such as Mindway AI, and that customers identified with the highest potential risk may undergo a further manual review, which could lead to conversations and interventions by a specialised team. Results are reviewed by the Group Executive Committee and the Sustainability and Compliance Committee, by Entain's account. [1] [2] [3] [4]

Who implemented it

In-house (In-house): Developed ARC in-house..
Mindway AI (Software vendor): Named by Entain as an independent third-party expert with which player protection tools were jointly developed..
EPIC Risk Management (Consultancy): Carried out the 2022 audit of model accuracy cited in Entain's annual report..

Technology (SEAM pillar E)

SEAM types: T8 Predictive / ML models. Deployment: Not reported. Vendors and products: Mindway AI, ARC (Advanced Responsibility and Care).

Where it was built in: Monitors customer account activity in Entain's online brands and, from 2023, its UK and Ireland shops, prompting limits, reality checks and manual review.

What changed

Before: no measured baseline is reported. The regulator's 2022 statement describes safer-gambling and anti-money laundering failures; the dated examples it gives run from December 2019 to October 2020. After: Entain monitors accounts with risk models and prompts interventions in 27 online jurisdictions and its UK and Ireland shops, by its 2023 figures. No regulator review of ARC itself was found. [1] [2] [3] [4]

What it cost

Not reported for ARC. Separately, the UK Gambling Commission's 2022 settlement was £17 million, directed to socially responsible purposes; its statement does not mention ARC.

What it saved

Not reported. Entain's reported outputs: 8.7 million ARC interventions in 2023; 98% of high-risk and 65% of medium-risk players set at least one control, per iGaming Business citing Entain's 2023 ESG report. [1] [2] [3] [4]

Governance and control

Entain says programme results are reviewed by the Group Executive Committee and the Sustainability and Compliance Committee, and that the highest-risk accounts may go to manual review. Entain describes the model's accuracy as independently assessed by EPIC Risk Management; the audit itself was not found. Separately, the UK Gambling Commission's 2022 settlement added licence conditions on board oversight of an improvement plan and a third-party compliance audit; these concern Entain's compliance generally and do not mention ARC.

S2 · Accountable owner · Claimed
Results are reviewed by the Group Executive Committee and the Sustainability and Compliance Committee, by Entain's account. [2]

A1 · Safe use · Claimed
Entain says controls such as financial limits, reality checks, time-outs and self-exclusion are applied where players voice concerns or a problem is identified; per iGaming Business, its 2023 ESG report said it planned to launch an AI policy in 2024. [2] [3]

A2 · Human in the loop · Claimed
Customers identified with the highest potential risk may undergo manual review by a specialised team. [2]

A3 · Monitoring and assurance · Claimed
Entain says a 2022 audit by EPIC Risk Management assessed model accuracy at 96%, 92% and 80% across three groups; the audit itself was not found. [1]

A4 · Vendor AI · Not reported
Entain says the tools were jointly developed with third-party experts such as Mindway AI; how it oversees supplier models is not reported. [2]

A5 · Agent controls · Not reported
No agents described.

A6 · Standards and regulation · Not reported
No regulator review of ARC was found. The UK Gambling Commission's 2022 £17 million settlement with Entain over safer-gambling and anti-money laundering failures, and the licence conditions it added, do not mention ARC. [4]

What worked, what did not, what is unproven

WORKED

– Scale: 8.7 million interventions in 2023, by Entain's account.

– Uptake of controls by flagged players: 98% of high-risk players set at least one control, by Entain's account.

– Model accuracy of 96% for the top 50 high-risk players in a 2022 audit by EPIC Risk Management, by Entain's account.

DID NOT

– Not reported

UNPROVEN

– Whether ARC reduced gambling harm: no independent outcome study was found.

– How often flagged players were wrongly flagged: Not reported. The audit measured accuracy

– Whether the interventions counted involve a person or are automated messages: Not reported.

Timeline

2021 Entain launches ARC (Advanced Responsibility and Care) [3]

Aug 2022 UK Gambling Commission announces a £17 million settlement with Entain over social responsibility and anti-money laundering failures; the statement does not mention ARC [4]

2022 Audit of model accuracy cited by Entain; roll-out begins to 22 international markets [1]

2023 ARC live in 27 online jurisdictions and in UK and Ireland shops; 8.7 million interventions [3]

2026 Entain's player protection page describes ARC as jointly developed with third-party experts including Mindway AI, with manual review of the highest-risk accounts [2]

2 · Grade and SEAM assessment

MarLuc's opinion, made on the evidence above. How cases are graded: marluc.co.uk/case-studies/how-we-rate

Level of change and impact

Claimed: Not applicable. Grade: C, Process change. Proof: Claimed only. Level of change: Process change.

Process change (Level 2, band C): a monitoring and intervention process rebuilt around machine-learning risk scoring. Level and band rest on Entain's own account.

A safer-gambling monitoring process rebuilt around machine-learning risk scores, with manual review of the highest-risk accounts, by Entain's account. The evidence is Entain's own, so any change in harm is unproven.

The SEAM view and lessons learnt

Entain launched ARC in 2021 and widened it in 2022 and 2023, the period of the regulator's settlement and improvement plan, so any effect of the programme cannot be separated from that regulatory pressure. Results are Entain's own: counts of interventions and an audit it reports, not outcomes for players. A leadership team should ask what independent evidence shows harm fell, and how false flags and customer complaints are measured.

1. Measure harm outcomes, not just the number of interventions.
2. Send the highest-risk cases to trained people for review.
3. Publish audit scope and error rates, not accuracy alone.

Evidence

Score 2 of 4. Self-reported: Entain's annual report, sustainability page and ESG figures relayed by iGaming Business; the regulator's action does not mention ARC.

Evaluation method. Self-reported company figures: an accuracy audit and intervention counts reported by Entain, relayed by iGaming Business.

3 · Original sources

Read these in full. To challenge a fact or a grade, use the contact form at marluc.co.uk or the link on https://marluc.co.uk/case-studies/entain-arc-player-protection

[1] Entain: Annual Report 2022, responsible moments
https://entaingroup.com/investor-relations/annual-report-2022/responsible-moments

[2] Entain: Be a leader in player protection
https://www.entaingroup.com/sustainability-esg/be-a-leader-in-player-protection/

[3] iGaming Business: Entain player protection tool usage up 98%, as firm highlights top ESG priorities
https://igamingbusiness.com/sustainable-gambling/entain-player-protection-tool

[4] UK Gambling Commission: Entain to pay £17 million for regulatory failures
https://www.gamblingcommission.gov.uk/news/article/entain-to-pay-gbp17-million-for-regulatory-failures

Entain plc website: https://www.entaingroup.com

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