



JENNINGS RACING RESPONSE TO:

**DCMS TRIENNIAL REVIEW OF STAKES AND PRIZES ON ALL
ELECTRONIC GAMING MACHINES (EGMs)**

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1: Jennings History

Jennings Racing Limited, now trading as Jenningsbet, is a third generation family owned retail bookmaker. The owners having supported the growth of the company from one betting shop in 1961 to now over 100 branches operating in the UK.

We currently employ over 500 people, some of whom have been with us for more than 25 years and 58% of our workforce is aged between 18-25.

We continue to contribute to local economies via job creation, business rates and investment in our retail estate. We also contribute to the wider national economy through Betting Tax, NI Contributions, Corporation Tax, VAT and now Machine Games Duty (MGD).

Part of Jenningsbets' growth in the retail sector has been possible by the introduction of The Gambling Act 2005 in September 2007. The Act effectively removing '*The Demand Test*' that existed in the previous legislation. This has made it easier to relocate and open new shops in areas of high footfall locations and therefore increasing levels of business in the majority of betting markets.

2: Jennings Position

Jennings supports our trade body, The Association of British Bookmakers (ABB) response to this consultation.

Jennings has been party to the ABBs consultation and has provided statistical data which has formed part of the ABBs supportive evidence.

In addition we support the Governments' review and trust that the review will be based upon sourced and verified evidence and not unverified comments and opinions. However, as one of the largest independent operators in the sector, we feel the need to also submit a response to the consultation, especially as many of our 500 employees have expressed concern over its potential findings and the continued unwarranted attack on the industry by the Campaign for Fairer Gambling (CFFG).

3: Gambling in Society

Gambling has been a part of British Society for many years, with many forms becoming regulated in various ways since the mid 1960's.

Over the past few years, gambling has become more mainstream with the introduction of the National Lottery, National Lottery scratch cards and television shows such as 'Deal or No Deal', 'The Cube' and 'Ant and Decs' Takeaway' all providing various levels of entertainment to all sectors and all ages of society.

Through technology, the opportunity to gamble is now more widely available than ever, via the internet, via telephone betting, the use of mobile phone applications and interactive television.

Consequently, as outlined in the most recent (July 2012) House of Commons Select Committee Report "*The Gambling Act 2005: A bet worth taking?*" Gambling is now widely accepted in the UK as a legitimate entertainment activity.

4: Jennings Strategy

Over the years, Jennings has been most innovative in the independent sector, some 4 years before the 'No Smoking' ban was introduced in July 2007, we were already offering our customers segregated 'No Smoking' betting lounges and offering our customers many new betting markets including offering bets on the outcome of the Irish Lottery before this became the norm. Successfully trialling of 'virtual' events such as 'football', 'horse racing' and 'Greyhound Racing', being the first to introduce self-service betting terminals throughout our estate and providing the first supplier of fixed odds betting terminals (FOBTs), Global Draw of suitable trial locations within our estate as early as 1999. (FOBTs now being classified as Electronic Gaming Machines (EGMs)).

Various forms of deregulation over the years, including, the ability to advertise in our shop windows, trading on a Sunday has, coupled with the increase in betting markets and better facilities, enabled Jennings to grow our, despite the restriction of '*The Demand Test*' within the 1963 Betting, Gaming & Lotteries Act.

However, the introduction of The Gambling Act 2005 and the removal of '*The Demand Test*' provided the owners with more confidence to increase their investment in the company to where we are today, with over 100 shops and over 500 employees.

The suggestion by some that as a company we have targeted vulnerable people in deprived areas is not only offensive but false.

The vast majority of our new shops developed over the past are located in retail Town Centres with high footfall and high density of population. The remaining new shops and existing estate serve smaller local communities. Many of our shops have formed the hub of local communities for over twenty years, with our customer base being across all fabrics and ages of society.

5: Social Responsibility

Problem Gamblers

Jennings has always been a responsible operator, having worked with local communities and contributed, making charitable donations.

We contribute annually to the Responsible Gambling Trust who assists those that have developed problems with their gambling.

Gamcare, a charitable organisation who provide a helpline service for problem gamblers is prominently promoted throughout our estate.

Having been a member of the ABB since its inception, we work with and adopt codes of practice as issued. In addition, we adopted the ABB workbook and DVD "Social Responsibility and the Licensed Betting Office" first published in 2006 into our on-going staff training programme. This training helps staff in encouraging responsible gambling and assists those customers expressing concern about their gambling.

Underage

We operate a strict 'Challenge 21' policy, whereby anyone entering one of our premises that appear to be under the age of 21 is challenged immediately and asked to produce suitable ID. Should they be unable to, the person is asked to leave the premises. Our challenge 21 policy also forms part of our on-going training programme. To test that our policy and procedures are robust enough, we employ an independent testing company.

6: Consultation Response

- Question 1: Providing any review is based upon evidence and be unbiased in its starting position, then every four years. This would provide sufficient evidence to be obtained and presented.
- Question 2: No comment other than to support the ABB position
- Question 3: We do not believe 'tracking technology' is necessary and doubt it would be workable nor effective. It is our belief many customers would 'opt out' of allowing their data being analysed and therefore any findings from player tracking would be inaccurate and inconclusive.
- Question 4: Yes see response to Q6
- Question 5: Yes see response to Q6
- Question 6: Yes, we support the ABBs position and submission on this point
- Questions 7-12: We support and mirror the ABBs submission
- Question 13:
- a) We support and mirror the ABBs submission
 - b) We support and mirror the ABBs submission
 - c) We support and mirror the ABBs submission
 - d) This is a loaded question. A high staking customer is at no more risk of problem gambling than a small staking customer. To start, we would need to ascertain what would describe a 'high staking' customer. A problem gambler and therefore to "be at risk" would in our opinion be someone that gambles beyond their means. This could involve someone that stakes as little as £5.
 - e) There is no empirical evidence to support a reduction in the stakes and prizes for B2 machines. We support the ABBs submission on this point.

- f) We support the ABBs submission on this point.
- g) If the government was to accept the proposal from some quarters and reduce stakes and prizes on B2 machines, the impact on our business would range between some shop closures and redundancies to effectively Armageddon, depending on the levels adopted.

Questions 14-35: We support and refer to the ABBs submission on this point.

7. SUMMARY

In summary, we are concerned that a minority but vocal group the 'The Campaign For Fairer Gambling' (CFFG) have been supported by some MP's with some of the CFFG claims being quoted in the National Media without any attempt to verify any 'evidence' it produces. This we believe has led to the weighting of this consultation against B2 machines. The CFFG is led by Derek Webb under the guise of a concerned citizen despite the fact that he is a casino tycoon having sold his gaming company for \$22m in 2011.

There has been no evidence of a casual link between electronic gaming machines including B2 machines and problem gambling. We refer you to the ABBs submission and supportive evidence of this fact.

There is also no empirical evidence that a reduction in the stakes and/or prizes on EGMs will have any impact on reducing the number of problem gamblers, or those at risk of developing a problem with their gambling behaviour.

Our experience is that a problem gambler takes part in a range of gambling activities on a regular basis and that it would be wrong to focus on just one product.

We are of a view that problem gambling should be viewed as person -centric rather than product-centric.

Should the consequence of this consultation be that stakes and prizes be reduced, the future expansion and acquisition plans of Jenningsbet, a High Street bookmaker for over 50 years would be in serious jeopardy along with many of its existing shops and 500+ employees.