

## **Customer D comments on the Provisional Findings**

Dear Sir/Madam

I would like to make a submission following reading your provisional finding relating to the Ladbrokes Coral merger. I am disappointed that responsible gambling and protecting vulnerable customers is not mentioned at all in your findings.

### **Past failings relating to responsible gambling at Coral**

Coral has a very clear problem relating to responsible gambling and protecting vulnerable customers. This was proven when the Gambling Commission published findings following an investigation into a case where they found 'serious failings' at Coral:

<http://www.gamblingcommission.gov.uk/Press/2016/Lessons-to-be-learned-from-failures-at-Gala-Coral-Group.aspx>

### **Current failings relating to responsible gambling at Coral**

I have asked the Gambling Commission to investigate a further issue relating to responsible gambling at Coral. As recently as 6 May 2016 a senior representative of Coral said that a customer who demonstrates the following behaviours:

1. Often spending 14-16 hours a day gambling with Coral – a known characteristic of a problem gambler.
2. Very regularly begging Coral for bonuses – a known characteristic of a problem gambler.
3. Stakes varying from 10p to £11,000 – massively varying stakes are a known characteristic of a problem gambler.
4. Cancelling withdrawals and immediately gambling money that has been withdrawn, both online and in shop – a known characteristic of a problem gambler.
5. Losing £27,000 in 10 minutes playing blackjack with Coral and betting more than £1,000,000 in a weekend with Coral. This is without Coral making any attempt to ascertain source of income or lifestyle of the customer – mirroring the failings outlined in the Gambling Commission report.

Is not a problem gambler. I repeat, even after the Gambling Commissions report where it was stated that Coral have changed their ways, Coral thinks that a person like this is not a problem gambler. Instead, Coral sees a customer like this as exhibiting behaviour "consistent with that of a sophisticated and experienced VIP customer in control of his gambling." This is very clear proof that Coral does not understand problem gambling, or their responsibilities relating to responsible gambling and protecting vulnerable customers.

### **Impact of Ladbrokes Coral merger on responsible gambling**

The merger of Ladbrokes and Coral will undoubtedly have an adverse impact on customers with gambling problems betting in LBOs.

As you have outlined, the brand or fascia of a LBO is less important than the proximity. Reducing choice on the High Street means it is more likely a customer will end up betting in a Ladbrokes Coral shop, as opposed to a Coral shop now. I have proven Coral have distain towards problem gamblers and do not adequately protect them, and if this culture

feeds through into the merged company then more problem gamblers and vulnerable persons will be affected by their behaviours.

## **Remedies**

There are several things CMA could do to remedy this situation, and I have listed them below in order of importance and efficacy.

1. Block the merger of Ladbrokes Coral until Coral's conduct relating to responsible gambling and protecting vulnerable persons have been proven and agreed by the Gambling Commission.
2. Postpone the merger and conduct a full investigation on the impact of the merger on responsible gambling and protecting vulnerable customers.
3. Ask the Gambling Commission to conduct a full historical investigation into Coral, provide redress to customers affected by their unethical policies support tougher legislation which will protect some of the most vulnerable members of society.