



Sir Steve Bullock  
Mayor of Lewisham  
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London SE6 4RU

02/12/16

## **Re: Call for Evidence - Review of Gaming Machines and Social Responsibility Measures**

Since the Gambling Act 2005 and the failure of current planning legislation to effectively empower LAs to better regulate betting shops we have seen a significant increase in the number of such operators in Lewisham. According to the Fairer Gambling Campaign, Lewisham currently has 63 betting shops, while 227 FOBTs are located across the Borough.

Last year £62,567,885 was inserted into FOBTs in Lewisham, while £15,641,971 was lost on these terminals in the same year. It is of deep concern to us that according to the Gambling Commission's estimates, 2070 of the 9,453 residents who use the FOBTs are likely to be problem or at-risk. This group of problem gamblers are losing an estimated £5,771,938 a year on FOBTs, equivalent to over a month on the average wage locally.

As a local authority we do not have the resources or expertise to develop specific proposals about the operation of these machines. Nonetheless we believe it is important that our observations as community leaders and the feedback we receive from residents form part of the Government's review and the answers to our questions are framed on that basis.

### **Q1. What, if any, changes in maximum stakes and/or prizes across the different categories of gaming machines support the Government's objective set out in this document? Please provide evidence to support this position.**

The efforts to limit the maximum stakes to £100 per game were a positive move but do not go far enough. Despite the fact that players now have to access stakes over £50 by loading cash via staff interaction or using account based play, due to the number of plays you can undertake per minute players can still lose £300 per minute. Either the maximum stakes or the number of games per minute needs to be reduced, or perhaps both to reduce risk to the player.

### **Q2. To what extent have industry measures on gaming machines mitigated harm or improved player protections and mitigated harm to consumers and communities? Please provide evidence to support this position.**

As above, more needs to be done to reduce the risk of the player losing significant amounts in a short space of time. The industry appears to have undertaken research in to the

patterns of gaming, however their local area risk assessments need to go further to include significant impact on individuals and the community.

**Q3. What other factors should Government be considering to ensure the correct balance in gaming machine regulation? Please provide evidence to support this position.**

The government should be looking at better regulating the marketing of gaming machines across all ages, paying particular attention to how gaming machines are marketed within betting facilities, family entertainment centres and adult gaming centres. For example, the slogans similar to 'bet £10 win £20' are misleading as you may not always win.

**Q4. What, if any, changes in the number and location of current gaming machine allocations support the Government's objective set out in this document? Please provide evidence to support this position.**

The council has received numerous correspondence from residents raising concerns about the proliferation of betting and gaming shops. Residents are recognising that the limitations on the number of machines you can have in a single store is resulting in businesses opening lots of premises in a small area so they can increase the number of machines they have. Deptford High Street is one such area where there are 10 betting shops in very small proximity to each other, where 4 businesses including Paddy Power and Ladbrokes have more than one store on the street. Deptford High Street is in a ward where there are higher levels of crime, substance misuse and deprivation. The proliferation of betting stores in this area only adds to the concerns around these issues, and there are similar cases elsewhere in the borough such as Lewisham and Catford.

Changes could be made to this system to discourage businesses wanting to open more than one premises small geographical areas. Perhaps by placing restrictions on the distance that a business can open a second store within a small geographic area, or by raising the limit on gaming machines so that businesses are deterred from opening many stores. Measures would need to be put in place to ensure that this did not just result in the same number of stores but with more machines. Whatever the change, something needs to be done about the current situation where this restriction to the number of machines per store is fuelling the influx of betting shops into small areas, particularly deprived communities.

**Q5. What has been the impact of social responsibility measures since 2013, especially on vulnerable consumers and communities with high levels of deprivation?**

Measures included in the social responsibility guidance published in February 2015 were a positive step towards encouraging the industry to take responsibility for their customers wellbeing. We believe that the self-exclusion element of this guidance is a good measure to help those who are already suffering problems from gambling addictions and are able to recognise their problem.

**Q6. Is there anything further that should be considered to improve social responsibility measures across the industry? Please provide evidence to support this position.**

The industry could go further to help those vulnerable to addiction or those who are not able to help themselves by undertaking enforced exclusions of customers who they identify as displaying patterns of addiction. In the New Cross ward of our borough a Bet Watch has been set up and work was undertaken to identify problematic customers who suffered from drug and alcohol dependencies and used proceeds obtained from begging and crime to gamble in their stores. The gambling added to their lifestyle problems and the BetWatch scheme took steps to exclude 11 problematic customers from their stores. We would like to

see more of this type of measure undertaken across the industry as a step to address gambling addictions and the related behavioural problems that can come with this, including anti social behaviour and crime.

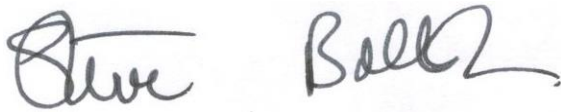
**Q7. Is there any evidence on whether existing rules on gambling advertising are appropriate to protect children and vulnerable people from the possible harmful impact of gambling advertising?**

See question 3

**Q8. Any other relevant issues, supported by evidence that you would like to raise as part of this review but that has not been covered by questions 1-7?**

N/A

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Steve Bullock', written in a cursive style.

**Sir Steve Bullock**  
Mayor of Lewisham