

Name:

Organisation: GRASP, Gambling Reform and Society Perception.

Q1.

In relation to B2 content, GRASP maintains the concerns that we expressed in the 2013 Triennial Review. Notwithstanding the restrictions on ability of the player to exceed a single £50 stake, other game characteristics such as speed of play, repeat bet options and permitted use of debit cards to fund play, still combine, to present the player with the opportunity to quickly sustain damaging and potentially devastating losses. Grasp continues to receive worrying accounts from B2 & B3 machine players, of unsustainable losses incurred in very short spaces of time.

We believe that characteristics other than stake/prize, speed of play in particular, contribute significantly to damaging levels of participation, and we will details these in subsequent answers. Detailed accounts from B2/B3 players leave us with little doubt however, that a significant reduction in stake/prizes would remove to some degree the opportunity for chasing losses and contribute to a reduction in problematic play, **GRASP therefore supports calls for a significant reduction in FOBT stake/prizes.**

We do however have significant concern over the possibility that a reclassification to B3 might be sought, of content currently classified B2, especially if the £2 maximum stake advanced by a number of campaigns comes to fruition. The more frequent game execution (*2.5 seconds*) & increased access (*AGCs, bingo halls, service stations*) associated with B3 games would seriously mitigate any safeguard achieved by stake reduction, if it were to be applied to the FOBT casino game content, currently classified as B2. **We therefore hope that any such reduction would be accompanied by a measure to preclude any such attempt.**

GRASP believes that the issues arising from B3 machine play have been significantly underestimated. As the figures in *table 2*. demonstrate, it is the fastest growing format in terms of both machine numbers and GGY. Through accounts given by players, we are increasingly aware that B3 machine play is a significant contributor to problem gambling, especially among those playing in bingo halls. We hear increasing numbers of reports of loss chasing on B3 machines, stakes are significantly lower than those on B2 content, but games are concluded and played far more quickly. Wins as high as **£499** can also be gambled to win a maximum **£500** jackpot, effectively sidestepping the £2 stake limit. GRASP believes that a reduction in the maximum stake/prize is appropriate and we would certainly urge rejection of any request for an uplift.

In relation to **Cat D.** games, GRASP again wish to restate our concerns over stakes/prizes. Despite being seen in some quarters, as a relatively innocuous pastime, we frequently receive accounts from former & current problem gamblers, citing childhood/adolescent machine gambling as their first rung on a ladder of gambling addiction. Of course for many, the experience will pass and remain a childhood only pastime. We assert however,

that the number of problem gamblers who have contacted GRASP citing childhood fruit machine gambling as causing or contributing to long term residual harm, runs counter to and indeed rebuts any *'harmless bit of fun'* analysis.

We were pleased that the 2013 review sought to offer no increase in stake or prize on what we consider to be the most dangerous machines within this category, Cat D, complex (reel based slot machines) as these were strikingly and indeed alarmingly similar in content and design to *'harder gambling'* machines such as B3, but more significantly Cat C. We were concerned though at the requests from industry representatives BACTA though, for a 100% uplift in stakes/prizes on these machines. The fact that this was tempered with a caveat that they would seek no further increases for a subsequent 10 years suggests that they themselves were aware that this would be a step too far. We felt that Statements used to support their position at the time hinted at some kind of a request for parity with other adolescent leisure/recreation pursuits, generally considered to be more constructive.

Given the decline of the *Cat D*. market, both in average machine numbers and GGY. GRASP is concerned that similar requests may once again be made. We would urge in the strongest terms, that concerns expressed and taken into account in the 2013 review remain and that any such requests be rejected.

GRASP continues to believe that the existence of CAT D machines *runs counter to the aim within the Gambling Act 2005, to protect children from gambling harm*. The Act sought to remove machines from what were considered *'Ambient'* locations, take aways, taxi ranks etc. Yet we see Cat D. machines frequently deployed in Service stations, Cinema foyers, bowling alleys and even airport check- in and departure gates. GRASP believes that this contributes to an unhealthy normalisation of machine gambling in young people. Our primary position is that there should be a phased removal of Cat D. machines from ALL sites.

Failing this primary stance, we believe there is an urgent need to examine the true stake/prize limit on Cat D. complex games. The current maximum £5 jackpot is circumvented by gameplay characteristics such as *'Winning Streaks' & 'Jackpot repeats'* where total wins far in excess of the £5 limit are achievable. The compensated nature of the machines also results in gluts of winning outcomes, **all likely to skew the perception of potential outcomes in machine players whose age has no lower restriction within the current legislation.**

GRASP would urge caution in relation to the stakes/prizes on Cat C. machines, especially as a large number of these games are cited in licensed premises. Any further uplift subsequent to that resulting from the 2013 review, could significantly increase gambling in licensed premises. Although currently it is by no means the primary activity in such locations, GRASP are aware of media reports quoting requests by BACTA for an uplift in stake to a maximum of £10 and for the introduction of *'contactless'* debit card payment for machine play. GRASP consider such proposals, where alcohol consumption and socialising are the primary purpose, to constitute too greater risk of an increase in impulsive and compulsive play and strongly oppose any such requests.

Q.2

The extent to which industry measures have mitigated harm is difficult to quantify. Although GRASP is reluctant to dismiss these measures entirely, feedback given by players and in some cases, members, is that the optional time and staking limits are largely ignored and over-ridden, simply by the press of a button by many players. A significant number even stated that they were an annoyance more than anything, slightly slowing down the pace of play at points where the intervention occurred, but not the extent where this constituted any real safeguard against excessive time or money being spent. Indications based on our dialogues with players, is that on the whole, these measures have had little or no impact upon the manner in which they engage with the machine.

A good deal of reference has been made to staff intervention and training towards this, particularly by the LBO sector. Our impression gleaned from dialogues with players and also some workers is that this is of questionable impact. Staff have claimed, understandably, to feel vulnerable in dealing with customers showing signs of difficulty. Risks of violence are seen as significant by some and well publicised instances of violence in shops, do to little to disavow one of that legitimately held fear.

Even a well trained and skilled employee will be seriously restricted in their impact due to an increasingly prevalent tendency towards lone working in shops, even late at night.

Cat. C. machines received a significant increase in prize limit as a result of the 2013 Triennial Review. Although the GGY has remained stagnant in the intervening period, the number of machines has increased by **18.9%**. Grasp is aware that the pub sector are seeking a further increase in maximum prize to £150 and creation of an additional machine category to allow for £10 stakes and the use of Contactless payment. Observations of the manner in which players engage with Cat C. machines in pubs and accounts from players, indicate that there is virtually no effective supervision or safeguard against problematic play. It is indeed difficult to imagine what measures could realistically succeed in this environment, other than reducing the speed of gameplay or reducing stakes. At the very minimum, GRASP would ask government to decline any request for a further uplift in stakes or the introduction of contactless payment, on the basis that this sector is unable to demonstrate sufficiently robust harm reduction measures.

Q.3

Grasp believes that it is necessary to examine in depth, the effectiveness of the legislative aim within the Gambling Act 2005, to protect young and vulnerable people from harm. The increase in Cat C. stakes and the light-touch largely voluntary curbs placed on B2 games, in our view demonstrate that industry interests were disproportionately advanced as a result of the 2013 review and subsequent measures introduced.

The aim of protecting the vulnerable and especially young people needs to be reasserted. To this end, there needs to be a robust scrutiny of the merits/otherwise of those gambling products legally made available to young people. In particular Cat D. machines.

Q.4

In addition to stakes/prizes, there are a number of factors highlighted by players, that impact upon the manner in which compulsive players use the machines.

Speed of play is an oft cited characteristic, which in the view of our members has contributed to excessive and in many cases exhaustive play. Serious consideration needs to be given to slowing down the speed at which individual games can be completed. Particularly in the case of B2, B3 and Cat C. games.

The number and location of machines is also an issue cited by many who interact with the GRASP group.

Cat D. machines have a multi -layered significance with regard to this issue. GRASP is firmly of the view that at the very least, access to these machines needs to be highly restricted and that in particular, their placement in 'leisure' facilities such as cinemas and bowling alleys along with areas such as service stations and airport departure lounges is entirely inappropriate. The machines should be sited only in areas where access by minors is prohibited. In allowing the current regime, GRASP believes that The 2005 Act fails in its aim to protect young people from gambling harm.

Cat D. machines occupy a very low rung on the regulatory ladder. They attract no duty payments and in AGCs & bingo halls in particular, they can be deployed without limit in number. Concern arises here, that Cat.D machines can be used as an inexpensive means of boosting the total number of machines in a given location, in order to allow a higher number of B3 higher stake/prize machines. GRASP believes upon investigation that this occurs in some bingo halls, where Cat D machines are located in out of the way parts of the venue, unlikely to attract much interest, but allowing an increased number of B3 games in prominent positions, typically just beyond the entrance lobby.

GRASP suggests that this manner of calculating the number of high stakes machines needs to be reviewed, possibly resulting in a fixed number, or that for the purposes establishing entitlement, Cat D. machines be discounted from the calculations.

GRASP express serious concern that ATM machines continue to be located alongside gambling machines in some bingo halls. This rightly attracted a good deal of criticism in relation to ATMs sited inside betting shops, and to an extent, that part of the industry responded appropriately. It is our assertion that ATMs should not be sited inside bingo halls or indeed alongside the Cat C. machines within licensed premises such as pubs.

There are issues relating to the location and number of B2/B3 machines within betting shops. We have questioned the effectiveness of the limits imposed both by government and the industry itself already, the location of the machines further impacts upon the effectiveness of these measures. Proximity of machines to each other allows for the simultaneous use of two or more machines, without any real difficulty, effectively circumventing the staking 'limits' imposed. This has been regularly witnessed upon visits to betting shops and in accounts by people who have engaged on our forum. There is a need to ensure that machines are sited in such a way as to preclude this.

Q.5

GRASP believe that the social responsibility measures have had little overall impact upon vulnerable consumers. Accounts of newer members to the group and information shared by players indicates that the measures put in place can be ignored or at least overcome with ease. Players will frequently describe them as an annoying but brief interruption to play. Players will Deposit significant sums, frequently by debit card at the counter of a betting shop and will continue to stake £100 per game, often with little in the way of effective scrutiny or intervention by the staff member. Although the number of £100 stakes has clearly reduced, the number of people reporting unsustainable losses to us, remains significant.

GRASP continues to believe that some form of 'opt in' or 'pre-commitment' system would be more effective in supporting players to gamble within realistically affordable limits and less likely to stake at levels with what can often be devastating residual consequences for themselves and their families.

Q.6

The ability to use debit cards to access machine play is cited by people contacting GRASP. Many believe that this alone, mitigates any social responsibility gains that may have been made since 2013. This enables players to gamble with very large sums, often far greater than those originally intended. In our experience, the ability to use debit cards, **without the usual 'cash advance limit'** is possibly the greatest single facilitator of 'loss chasing'. Great reference has been made to the figure of £18,000 potential hourly losses by other campaign groups. GRASP asserts that much more modest sums, yet still high value sums are often lost with devastating outcomes. £2000 hourly losses and above, have been witnessed and these have almost invariably been facilitated by debit card use.

GRASP argues that if stakes on B2/ B3 machines are to avoid significant reduction, debit card funding of play should be discontinued, or at the very least be subject to the limits associated with cash advances, this essentially being the true nature of the transaction.

Q.7

The vast increase in the number of advertising slots related to gambling has long been a concern to GRASP. The restrictions on pre-watershed gambling adverts on TV is of course welcome. The exclusion of sports betting adverts during live sporting events however, is a highly questionable exclusion and entirely inappropriate within the context of protecting children. The proliferation of gambling advertising during live football accompanied by the number of references made to gambling related sponsorship of sport is worrying. GRASP believes that children have significant exposure to this type of information and that this is often difficult to mitigate with parental supervision. The argument that this exception should be revoked is in our view compelling and should be addressed as a matter of urgency.

We express strong concern at the regulation of gambling related advertising. Grasp has issued several complaints to both Ofcom and the ASA. The majority have been upheld. These typically related to breaches of the CAP guidelines, where gambling was linked to sexual success, financial success and linking gambling with persons under 25 years old. Even where complaints were upheld, there was no real meaningful sanction available. The most frequent judgement was that 'the advert must not be shown again in its current form'. The time taken to investigate and issue the decision often meant that the advert campaign in question had run its course. There was therefore no real sanction arising from the breach and hence little disincentive for even repeat breaches. We believe that any breach, and certainly repeat breaches need to be challenged by robust enforcement, possibly with financial penalty that in turn could be used to support measures taken to address problem gambling issues.