

Please find below evidence relating to questions 1, 1a, 3, 13 and 15 of the above review, to support the response of The Christian Institute.

Questions 1 and 1a

Individuals can lose several thousand pounds in an hour or two playing on FOBTs and, over time, hundreds of thousands of pounds in total (BBC News online, 26 August 2015, see <http://www.bbc.co.uk/news/uk-33566034> as at 22 January 2018; Mail on Sunday, 21 February 2016).

It has been reported more than a third of gaming machine users have problems with gambling (The Guardian, 10 December 2014).

According to GamCare statistics, a fifth of the helpline calls received disclose gaming machines in betting shops as the problem (Annual Statistics 2016/17, GamCare, page 5, see http://www.gamcare.org.uk/sites/default/files/file_attach/GamCare%20Annual%20Statistics%202016-17%20FINAL.pdf as at 22 January 2018).

Analysis of the Gambling Prevalence Survey estimates that 23% of the money spent on FOBTs is spent by problem gamblers (Orford, J, Wardle, H, and Griffiths, M, 'What proportion of gambling is problem gambling? Estimates from the 2010 British Gambling Prevalence Survey', International Gambling Studies, 13(1), 2013, pages 9 and 13).

Links have been made between FOBTs and money laundering by organised criminals (The Guardian, 9 November 2013; 'FOBTs debate: Money laundering issues are a new battleground', Gambling Insider, see <https://www.gamblinginsider.com/in-depth/2170/fobts-debate-money-laundering-issues-are-a-new-battleground> as at 22 January 2018).

As with many other addictions, some of those involved in using FOBTs will inevitably steal to feed their habit (The Guardian, 27 April 2016).

Reducing the maximum stake to anything higher than £2 would not go far enough. Data in the consultation paper itself demonstrates this:

- In approximately 99% of sessions the average stake is £50 or less. A cap of £50 would therefore make little difference.
- Where the stake is £20 or more, 42% of players are problem gamblers. Where the stake is reduced to £2, only 19% of players are problem gamblers.

Question 3

The status quo on B3 machines is causing problems. It is not enough to introduce the player protection measures the Government proposes. Action must be taken on the maximum stakes and speed of play.

In 2011 the Government increased the number of gaming machines allowed in bingo halls and raised the maximum stakes on category B3 gaming machines from £1 to £2. The number of B3 machines has nearly doubled since 2011 to 24,008. As the Government points out in the consultation paper, “Category B3 machines continue to be the fastest growing gaming machine in the market in terms of numbers and GGY”. The amount lost to these machines has more than doubled since 2011, rising to £390.4m in 2016/17 (Industry statistics: April 2014 to March 2017 – Spreadsheet Supplement, Gambling Commission, November 2017, page 2).

There is evidence of the harm this is causing, including some people incurring losses of thousands of pounds in an evening (BBC News online, 8 November 2016, see <http://www.bbc.co.uk/news/uk-37872831> as at 22 January 2018; Guardian online, see <https://www.theguardian.com/uk-news/2017/sep/16/fixed-odds-betting-terminals-odds-crackdown> as at 22 January 2018).

It has been suggested that B3 machines can be at least as addictive as FOBTs due to their much faster play time – every 2.5 seconds versus 20 seconds for FOBTs (Parke, J, Parke, A, Harris, A et al, The Role of Stake Size in Loss of Control in Within-Session Gambling, University of Lincoln, 2015).

Parke’s findings suggest that the increased protection of vulnerable people resulting from a reduction in maximum stakes on B2 machines could be partly undermined if B3s are left as they are. The Government should use a combination of reducing maximum stakes and increasing the time between plays to bring B3 machines into line with a £2 limit on B2s.

Question 13

Gambling advertising is at epidemic levels. It has become a cultural phenomenon. The proposed measures are welcome, but must only be a first step:

- The Gambling Act 2005 led to a dramatic increase in gambling adverts on television, from 152,000 in 2006 to 1.4 million in 2012 – over 4% of all TV advertising (Ofcom, Press Release, Ofcom publishes research on TV gambling adverts, 19 November 2013; Trends in Advertising Activity – Gambling, Ofcom, November 2013, pages 5 and 71).
- Gambling firms spent a record £312m on advertising in 2016, including £150m on television and £160m online (The Times, 21 August 2017).
- The industry code says bingo, lotteries and sports betting during live televised sporting events can be advertised before 9pm (Gambling Industry Code for Socially Responsible Advertising, Industry Group for Responsible Gambling, August 2015, paras 30-34; The Daily Telegraph, 25 October 2016). This means sports betting adverts are routinely seen by children. ‘The latest live odds’ are pushed, for example, before football matches and during halftime. In 2012, 69% of bingo adverts were shown between 6am and 5pm (Trends in Advertising Activity – Gambling, Ofcom, November 2013, page 15).
- The Gambling Commission found that 80% of young people aged 11-16 have seen gambling adverts on TV, 70% on social media and 66% on other websites, while 55% of young people see gambling advertisements on TV at least once a week (Young people and gambling 2017: A research study among 11- 16 year olds in Great Britain, Gambling Commission, December 2017, page 31).

Question 15

The Government’s view that local authorities have enough powers is based on “preventing future clustering”. This underestimates the extent to which clustering is already a problem and the damage it is causing:

- The ability of bookmakers to have no more than four FOBTs in each shop has led to a clustering of betting shops on the high street, as bookmakers simply open more shops so that they can have more of these lucrative machines (see BBC News online, 1 February 2014, see <http://www.bbc.co.uk/news/av/uk-25996435> as at 22 January 2018). The 2005 Gambling Act made this possible by repealing the requirement for betting companies to prove unmet demand before opening a shop (‘the demand test’).
- Machine gamblers who live near clusters of bookmakers are over 25% more likely to be problem gamblers than those who do not (Secondary Analysis of Machines Data: Examining the effect of proximity and concentration of B2 machines to gambling play, Geofutures, March 2016, page 23).

- A survey of gambling loyalty card holders found that people who were not working, on a lower income or living in more deprived areas played machines more frequently (Gambling machines research programme - Report 2: Identifying problem gambling, NatCen, November 2014, page 8).

- There is clear evidence that clustering tends to take place in poorer areas (The Guardian online, 28 February 2014, see <https://www.theguardian.com/society/2014/feb/28/englands-poorest-spend-gambling-machines> as at 22 January 2018; Wardle, H, Keily, R, Astbury, G et al, “‘Risky Places?’: Mapping Gambling Machine Density and Socio-Economic Deprivation’, Journal of Gambling Studies, 30(1), March 2014, pages 201- 212).

Local Authorities therefore need powers to tackle existing clustering. Tools to reject future licence applications or applications for planning permission are not enough. Local Authorities must be given mechanisms to deal with current bookmaker premises