

Analysis of the Association of British Bookmakers' submission to the DCMS consultation

Question 1

1. In paragraph 4.3 the ABB claims that the number of individuals at-risk of problem gambling is "in decline". However, in 2012 the Health Survey found there to be 280,000 problem gamblers in Britain, and in 2015 there were 430,000. The focus on headline problem gambling rates is an obfuscation, as what is useful for policy is determining the level of harm associated with each particular product, and whether or not reducing the maximum stake would reduce that harm. Research by Louise Sharpe and Alex Blaszczynski in 2001 concluded that the reduction of maximum bet levels was the only modification likely to be effective as a harm minimization strategy for problem gamblers. A link to that research, which is omitted from the ABB's submission, is [here](#).
2. The ABB cites a study for the government of New Zealand in paragraph 4.4 by True and Cheer, which they claim "found that there was no evidence linking gambling machines to problem gambling". What they fail to mention is that the research cited is not a scientifically rigorous piece of research but a highly selective literature review. Moreover, it does not appear to state that there is "no evidence linking gambling machines to problem gambling". The authors of this note are not academic researchers. Jarrod True is a lawyer who "provides advice nationally to over a third of New Zealand's gaming machine trusts"; Tim Cheer is the CEO of Pub Charity which relies on machine income.
3. In paragraph 4.9, the ABB state that because the increase in the number of B2 machines has not been met with an increase in problem gambling, there is "no correlation" between the two. The false premise of this argument aside, no attempt is made to address that very high rates of problem and at-risk gambling are associated with FOBTs, the most recent Health Survey putting the figure at 43% of users. Coupled with the findings of secondary research on the 2010 British Gambling Prevalence Survey that problem gamblers lose more on FOBTs than several leading gambling activities combined, the harm associated with this particular product far exceeds any other. A link to that research is [here](#).
4. In paragraph 4.10 the ABB claim that problem gambling rates are stable and "it is inconceivable that the introduction of B2 machines has masked what would have otherwise been a decline in problem gambling". However, research by John Storer and Max Abbot found that this was not inconceivable. They concluded that "statistically meaningful relationships were found for an increase in prevalence with increasing per capita density of EGMs", a link to this study is [here](#).
5. In paragraph 5.12 the ABB contends that "the high RTP and slower spin cycles significantly offset the higher staking potential on B2 machines." The data released by the Gambling Commission, contributed by Scientific Games and Inspired Gaming, entirely contradicts this statement.

6. In paragraph 5.19 the ABB claim that “lower stakes do not offer increased harm minimisation for consumers, as has been evidenced by the University of Lincoln, which looked at stake and the impact on control. Although the research as limited particularly by being carried out in laboratory settings, the researchers found that decision making was impaired at lower as well as higher stakes, even as low as £2.” What the ABB omit from their analysis is that the research found decision-making ability to be more impaired at £20 compared to £2.
7. In paragraph 5.21, the ABB claims that NatCen “established that there was no causal link between machine play and problem gambling”. NatCen may have been able to uncover a causal link, but the question they were set by the Responsible Gambling Trust was whether they could distinguish between harmful and non-harmful patterns of play. Stating a causal link did not form a part of their conclusions because they were not tasked with answering that question, not because one does not exist.
8. In the table contained in paragraph 7.2, the ABB seeks to justify why betting shops are “one of the safest places to gamble”. However, omitted from their matrix are staffing levels, door controls, quality of training and the ability to load machines via debit card. Most of the measures contained within the matrix, with the exception of not having ATMs in the premises, were considered in evaluations by Professor Charles Livingstone and NatCen to be ineffective. The claim that betting shops are “one of the safest places to gamble” is ludicrous given the quantity of reports of smashed machines (an example [here](#)), armed robberies (reported [here](#)) and assault and criminal damage (reported [here](#)).
9. In paragraph 8.5 the ABB claims that “B2 machines cause no greater harm to problem gamblers relative to other machines”. This statement is entirely without foundation. According to research by GambleAware, Bingo Halls’ B3 machines had 415 sessions with losses over £1,000, Adult Gaming Centres machines had 655 sessions with losses over £1,000, but bookmakers’ B2s had 230,000 sessions with losses of more than £1,000 last year. 650 sessions had losses of more than £5,000 and one session with losses of £13,778. 96% of sessions with losses over £1,000 came from bookmakers’ machines.

Question 2

1. In paragraph 1.3 the ABB claim their measures are “groundbreaking” and “previously unseen anywhere in the world”. This is a straightforward lie, as these measures are in place across the industry in the UK, and have been in place across the world for some time. Given the numerous tests that have been carried out by the BBC of the ABB’s self-exclusion scheme, which have all found it to be ineffective, it is illustrative of the ABB’s level of commitment to social responsibility that they have decided to include this in their submission as if it is something to be proud of.

Question 4

1. In paragraph 4.1, the ABB contends that “any change in gaming machine allocation in non-LBO locations should only take place if the appropriate levels of staffing, mandatory alerts, and voluntary limit setting capabilities are in place so as to ensure responsible gambling”. I infer from this that the ABB believes “appropriate levels of staffing” to be one single member of staff, even late at night, given all of their members operate a policy of lone working. This is despite a murder and a serious sexual assault taking place on their premises (reported [here](#)).
2. The table above point 2.4.4 shows a failure rate of one in four on Challenge on Entry. The ABB have admitted here that they are in breach of the license conditions, and the Gambling Commission is failing to ensure the licensing objective of preventing harm to the young and vulnerable is upheld.
3. The ABB claim in point 3.3 that “the increased number of RGIs since 2013 suggests that staff training and encouragement of staff to engage with those who may be experiencing a problem with their gambling has been effective”. This is flatly contradicted by the Revealing Reality report commissioned by the Industry Group for Responsible Gambling, which found that betting shop staff are poorly trained or see problem gambling measures as “pointless”; some staff reinforced “false beliefs” about lucky numbers or slot machines; responsible gambling messages were hidden where customers can’t see them; and betting firms set default spending limits as high as £99,999. Ladbrokes is also under investigation by the Gambling Commission for failing to intervene when a problem gambler took out payday loans in one of their shops, as reported by the Guardian [here](#).
4. In section 4, no mention is made by the ABB of the fact that the Senet Group was established as an “industry watchdog” and yet it has failed to deliver any punitive sanctions during a period where some of its members have received record fines for responsible gambling failings.
5. In paragraph 5.4, while ATMs may not be permitted inside a betting shop, the ABB omit that debit cards can be used to remotely load FOBTs from behind the counter.

Question 8

1. In paragraph 2.3, the ABB claim the number of police call-outs to betting shops to be 2,121 in 6 months. However, data from the Metropolitan Police obtained under FOI states this number to be 11,998 for the year 2015/16. Moreover, it is increasing year on year. The data can be viewed [here](#).