

# **Consultation on proposals for changes to Gaming Machines and Social Responsibility Measures**

Supporting evidence from  
Citizens Advice



This document contains a summary of Citizens Advice's response to the DCMS consultation on proposals for changes to gaming machines and social responsibility measures along with the relevant supporting evidence. The response itself was submitted via the online survey on 23 January 2018.

Under each question we have repeated our answer and, where appropriate, provided a slightly more detailed commentary. We have then provided or signposted to our supporting evidence.

## **Our evidence**

Our evidence is based on a research project we carried out throughout 2017 which explored the impacts and causes of problem gambling with a particular focus on affected others. This research resulted in the report ["Out of luck: an exploration of the causes and impacts of problem gambling"](#) which was published on 23 January 2018. In some of the questions we use data from the research which was not included in the report.

## B2 gaming machines (Fixed-Odds Betting Terminals)

Q1. Do you agree that the maximum stake of £100 on B2 machines (FOBTs) should be reduced?

If yes, what alternative maximum stake for B2 machines (FOBTs) do you support?

*Option 1 - Maximum stake reduced to £50 on all B2 content*

*Option 2 - Maximum stake reduced to £30 on all B2 content*

*Option 3 - Maximum stake reduced to £20 on B2 non-slots and £2 on B2 slots*

*Option 4 - Maximum stake reduced to £2 on all B2 content*

**Our response:** Yes - option 4 as it brings the maximum stake in line with other machines with similar maximum win per spin (e.g. B3, B3a and B4) and minimises harm.

**Our evidence:** In our survey of problem gamblers and affected others which informed our report [Out of Luck](#) we found that almost 1 in 4 (23%) of current or previous problem gamblers had struggled with gambling on any type of FOBT, 20% had struggled with gambling in person on FOBTs, and 12% had struggled with gambling on online FOBTs.

*Total number of survey respondents self identifying as current or previous problem gambler = 849. Base for questions on types of gambling struggled with = 585*

## Stakes and prizes on other gaming machines

Q2. Do you agree with the government's proposals to maintain the status quo on category B1 gaming machines? (*B1 machines are higher stake and prize and only available on casinos*)

**Our response:** Yes

**Our evidence:** In our survey of problem gamblers and affected others, we found that 46% of current or previous problem gamblers had struggled with gambling on slot machines (either in person or online), 26% had struggled with gambling in person on slot machines, and 33% had struggled with gambling on online slot machines. The survey also found that 41% had struggled with gambling in casinos of any type, 18% struggled with gambling in person in casinos, and 33% struggled with gambling in online casinos.

*Total number of survey respondents self identifying as current or previous problem*

*gambler = 849. Base for questions on types of gambling struggled with = 585*

Q3.Do you agree with the government's proposals to maintain the status quo on category B3 gaming machines?

**Our response:** Yes

**Our evidence:** In our survey of problem gamblers and affected others, we found that 46% of current or previous problem gamblers had struggled with gambling on slot machines (either in person or online), 26% had struggled with gambling in person on slot machines, and 33% had struggled with gambling on online slot machines.

*Total number of survey respondents self identifying as current or previous problem gambler = 849. Base for questions on types of gambling struggled with = 585*

Q4.Do you agree with the government's proposals to maintain the status quo on category B3A gaming machines?

**Our response:** Yes

**Our evidence:** See our evidence for Q3

Q5.Do you agree with the government's proposals to maintain the status quo on category B4 gaming machines?

**Our response:** Yes

**Our evidence:** See our evidence for Q3

Q6.Do you agree with the government's proposals to maintain the status quo on category C gaming machines?

**Our response:** Yes

**Our evidence:** See our evidence for Q3

Q7.Do you agree with the government's proposals to maintain the status quo on all category D gaming machines?

**Our response:** Yes

**Our evidence:** In our survey of problem gamblers and affected others, we found that 29% of current or previous problem gamblers had struggled with gambling in arcades, 16% had struggled with gambling in person in arcades, and 20% had struggled with gambling in online arcades.

*Total number of survey respondents self identifying as current or previous problem gambler = 849. Base for questions on types of gambling struggled with = 585*

Q8. Do you agree with the government's proposals to increase the stake and prize for prize gaming, in line with industry proposals?

**Our response:** Don't know

**Our evidence:** None

## Gaming machine allocations

Q9. Do you agree with the government's proposals to maintain the status quo on allocations for casinos, arcades and pubs?

**Our response:** Yes

**Our evidence:** In our survey of problem gamblers and affected others, we found that 26% of current or previous problem gamblers had struggled with gambling in person on slot machines, 20% had struggled with gambling in person on FOBTs, 18% had struggled with gambling in person in casinos, and 16% had struggled with gambling in person in arcades.

*Total number of survey respondents self identifying as current or previous problem gambler = 849. Base for questions on types of gambling struggled with = 585*

Q10. Do you agree with the government's proposals to bar contactless payments as a direct form of payment to gaming machines?

**Our response:** Yes - contactless payment allows 'uninterrupted' play and makes it harder to set or stick to stake limits. This is similar to topping up online betting accounts with pre inputted credit/debit card or bank details. In our research report "Out of Luck: an exploration of the causes and impacts of problem gambling" we found that one of the main triggers for people developing and maintaining a problem with gambling was the availability and ease of access to gambling facilities. Contactless payment would contribute to this.

**Our evidence:** See chapter 2 of the attached research report "Out of luck: an exploration of the causes and impacts of problem gambling".

## Social responsibility (SR) measures

### (i) Player protection measures on gaming machines

Q.11 Do you support this package of measures to improve player protection measures on gaming machines?

**Our response:** Yes. We fully support the package of measures recommended by the government. However, we would like to see more action on helping problem gamblers (or those at risk of becoming problem gamblers) with managing their gambling more broadly. In particular we would like to see improved self-exclusion measures in premises that offer gaming machines, full exploration of non-industry financial management or budgeting tools/methods, and further research into the barriers or issues individuals face in recognising they have a problem and allowing them to take more responsibility to protect themselves.

**Our evidence:** See chapters 2 and 3 of the attached research report “Out of luck: an exploration of the causes and impacts of problem gambling”.

### (ii) Online gambling

Q.12 Do you support this package of measures to improve player protection measures for the online sector?

**Our response:** Yes. We fully support the range of measures proposed. However, as with the measures to protect players of gaming machines, we would like to see more consideration given to broader protections for problem gamblers or those at risk of becoming problem gamblers that are not specific to certain types of gambling. These include non-industry financial protection or budgeting tools/methods, and further research into the barriers or issues individuals face in recognising they have a problem and allowing them to take more responsibility to protect themselves.

**Our evidence:** See chapters 2 and 3 of the attached research report “Out of luck: an exploration of the causes and impacts of problem gambling”.

### (iii) Gambling Advertising

Q.13 Do you support this package of measures to address concerns about gambling advertising?

**Our response:** Yes, we fully support all the measures proposed. But it is essential that the responsible gambling advertising campaign also makes clear the impact on affected others and sign post to support services for them. The Government should ensure that GambleAware evaluates it before the end of the two years. If it is

successful, the campaign should be extended, and if it is not, then other measures to raise awareness of support services should be considered.

**Our evidence:** See chapters 1 and 2 of the attached research report “Out of luck: an exploration of the causes and impacts of problem gambling”.

#### **(iv) Research, Education and Treatment (RET)**

Q14. Do you agree that the Government should consider alternative options, including a mandatory levy, if industry does not provide adequate funding for RET?

**Our response:** Yes - we agree that alternative sources of funding should be explored, but as there is currently a shortfall in funding and services available are inadequate it is clear that a mandatory levy is necessary and should be introduced. The support services provided at present need to be improved, expanded and better advertised which will require additional funding. The levy amount should be set to meet the need for expanded support services and to reach a higher percentage of problem gamblers.

**Our evidence:** See chapter 4 of the attached research report “Out of luck: an exploration of the causes and impacts of problem gambling”.

## **Local Authorities**

Q.15 Do you agree with our assessment of the current powers available to local authorities?

**Our response:** Don't know

**Our evidence:** None

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