

RESPONSE TO PROPOSALS FOR CHANGES TO GAMING MACHINES AND SOCIAL RESPONSIBILITY

1. CARE is a well-established mainstream Christian charity providing resources and helping to bring Christian insight and experience to matters of public policy and practical caring initiatives across the UK. CARE made an earlier submission to the *Review of Gaming Machines and Social Responsibility Measures* in December 2016, which is published on the Government's website.¹
2. Our response to this consultation covers questions 1 and 10-16 and may be published in full.
3. By way of introduction we would highlight that we commissioned ComRes to conduct polling on public attitudes to gambling. Between 19th and 21st January 2018 ComRes interviewed 2,036 GB adults online. Data were weighted to be demographically representative of all British adults aged 18+ by age, gender, region and social grade. The polling reveals that around 14.5 million people in Great Britain know someone with a gambling problem and that the majority of adults in Britain (63%) say that problem gambling is a significant issue in Britain. This clearly underlines the seriousness of the challenge. 66% of men (61% of men and women) think that the UK Government should make it compulsory for all gambling companies to pay a larger and equitable proportion of profit or turnover towards funding help for problem gamblers. Just 20% disagree (21% of men and women).

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?

4. **Yes, the stake should be reduced.**
5. CARE welcomes the Government's recognition that the evidence that CARE and others presented in the response to the *Review of Gaming Machines and Social Responsibility Measures* "*justifies government action*". Since we submitted evidence in December 2016, GambleAware has said, "*It is irrefutable that gaming machines are associated with harms*"² and *The Lancet* that problem gambling is a public health issue where there is a "*need to balance tax revenue with a duty of care to vulnerable members of society*" and FOBTs "*are a particular concern*."³ Data has also been published from 2015 that shows problem gambling prevalence rates were the fifth highest among FOBT users who had gambled during the past year at 11.5%, compared to the overall problem gambling rate of 0.8%.⁴
6. CARE said in December 2016 **that the maximum stake for FOBTs should be £2** and that remains our position for **all** B2 games. CARE is arguing for the £2 stake since research has shown that "*higher stakes...can contribute to a higher rate of loss; and rate of loss is a key component of gambling related harm*"⁵ and that gambling at higher stakes "*impairs decision-making quality, which in turn may reduce self-control when gambling*."⁶ We note that in addition the Government's published figures suggest a lower rate of problem gamblers with a £2 stake (para 2.20).

¹ One of the published responses in the zip file accessible at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/655947/Responses_to_the_call_for_evidence_-_Review_of_Gaming_Machines_and_Social_Responsibility_Measures.zip

² <http://about.gambleaware.org/media/1361/gambleawares-submission-to-dcms-review-of-gaming-machines-2-december-2016.pdf> para 1.9

³ [http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(17\)32333-4.pdf](http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(17)32333-4.pdf)

⁴ Gambling behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales, Anne Connelly, Hoolie Jones, Natalie Maplethorpe, Annemijn Sondaal, Heather Wardle, *National Centre for Social Research (Natcen)*, August 2017, Prepared for the Gambling Commission, page 2, Table 2.1, page 9; Table 4.5, page 45, <http://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2015.pdf>

⁵ Parke AJ Harris A, Parke J and Goddard P, (2014) The Role of Stake Size in Loss of Control in Within-Session Gambling: Impact of Stake Size on Reflection Impulsivity, Response Inhibition and Arousal when Gambling on a Simulated Virtual Roulette Gambling Task: Implications for Gambling Related Harm: Responsible Gambling Trust, page 86

⁶ *Ibid*

7. The Government has already tried to reduce the stake to £50, unless a player specifically requests a higher stake, but the most recent research suggests that although significantly less money has been spent on the maximum stake, that money has transferred to bets just below £50 and that there has been a trend towards longer sessions spending the same amount of money. None of the indicators suggest behaviour has *“moved in a direction consistent with more responsible or more considered play”*.⁷ There is no evidence to suggest that £30 or £20 will be any more effective than £50.
8. In line with this, it is interesting to note that recovering problem gamblers with whom we have spoken have advised that a £30 stake, or indeed a £20 stake would not address the presenting problem. At this level the FOBT experience would continue to be addictive. The only difference is that problem gamblers would take longer to spend their money and so they would spend more time away from their families. At £2, however, they argue that the lure for FOBTs for compulsive gamblers would be much reduced.

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

9. Yes. CARE fully supports the rationale for not allowing contactless payments as a direct form of payment for gaming machines (paras 4.21-22). We agree that players should not be able to directly use their debit or credit cards with gaming machines and agree that this should not be altered to allow contactless payments. More importantly, we also think there should be a complete ban on the use of credit cards for gambling on or offline (see below on our answer on Q12 on online). It is extraordinary that the current regulatory frameworks allows people to gamble using money that they do not have.

Q11. Do you support this package of measures to improve player protection measures on gaming machines?

10. Yes, but the measures in paras 5.8 do not go far enough.
11. We agree with the Government’s comment in para 2.6 that *“the bookmaking sector, and indeed the wider industry, has provided little evidence that self-regulatory measures introduced since 2013 have made any significant impact on the rates of problem gambling, or on the degree of harm experienced by individuals.”* Since our evidence was submitted in December 2016, the review of the self-exclusion scheme for betting shops has indicated that the position of FOBTs in betting shops can make it difficult to identify customers who may have self-excluded. Betting shops noted *“The volume of exclusions, all of which seem to be FOBT which makes the situation more difficult to manage due to the location of most FOBT zones in our shops”*. The evaluation recommended reforming the system so that it relies on membership cards or electronic IDs, which could be used on the FOBTs.⁸
12. A GambleAware report published in October 2017 said that the execution of responsible gambling initiatives *“was frequently disappointing”*, commenting in particular on the message *“When the Fun Stops, Stop”* as ineffective for some gamblers.⁹ Commenting on their publication GambleAware said it showed that the gambling industry as a whole is *“poor at giving staff suitable training in how to promote safe gambling amongst customers. The report also revealed customers felt existing responsible gambling messages are often confusing and unclear.”*¹⁰

⁷ Forrest D, Hales IG, FOBTs in British betting shops: Further analysis of machine data to examine the impact of the £50 Regulations, Prepared for GambleAware, January 2017, pages 2, 3, 69 <https://about.gambleaware.org/media/1467/jn175-moses-evaluation-report-final-report-230317.pdf>

⁸ Evaluation of the Multi-Operator Self-Exclusion Scheme (MOSES), Chrysalis Research commissioned by GambleAware, 23 March 2017, Op Cit, pages 2-3 and 24-27, <https://about.gambleaware.org/media/1467/jn175-moses-evaluation-report-final-report-230317.pdf>

⁹ Responsible Gambling: Collaborative Innovation Identifying good practice and inspiring change, Oct 2017, pages 10, 50 and 80. <https://about.gambleaware.org/media/1581/revealing-reality-igrg-report-for-gambleaware.pdf>

¹⁰ <https://about.gambleaware.org/media/1585/2017-10-04-revealing-reality-igrg-report.pdf>

13. Given the poor track record, **CARE recommends that the voluntary changes proposed in paras 5.8.1-5.8.4** to encourage to set time and spend limits, have mandatory alerts, prohibited mixed play between B2 and B3 games and algorithms to identify problematic play **should become obligatory licensing social responsibility conditions** since a voluntary approach has not seen sufficient change to help problem gamblers.
14. We support the proposal in para 5.9 to consider the use of further tracking data as long as the data protection issues are addressed and that data is used only with the player's consent.

Q12. On the whole, do you support this package of measures to improve player protection measures for the online sector?

15. Yes, but the Government should go further.
16. CARE is concerned about the growth in online gambling and referred to this in our December 2016 submission (see paras 25-29, 31 and 32). *The Lancet* article referred to above said, “*Less publicised is the growth of online gambling, with a potentially greater danger to health than other forms of gambling, particularly for those younger than 16 years of age.*”¹¹ We are concerned that gambling did not feature in the Government's Internet Safety Strategy Green Paper (a point also made by Gambleaware¹²): gambling featured only as “an online risk” in Table 1 of Annex A.¹³ CARE made suggestions in our response to that paper to amend the omission.

Adults, Self-exclusion and the Role of Tipsters

17. Online gambling presents special challenges because unlike betting shops, gambling is available 24 hours a day, 7 days a week from a multitude of different websites. CARE has been campaigning for some time on the impact gambling online can have for adult problem gamblers. The most recent data from the Gambling Commission suggests that the online sector is now just over a third of the gambling industry.¹⁴ The problem gambling prevalence rate for online gambling is 5.1% (compared to the general population where the prevalence rate is just 0.8%) and “*the highest overall prevalence of at-risk gambling (low or moderate risk gambling) was observed among those who participated in online gambling on slots, casino or bingo games (34.9%).*”¹⁵
18. Despite this, the law currently allows people to gamble online with borrowed money through credit cards and no steps have been taken to limit play in the middle of the night when problem gamblers are especially vulnerable. **CARE recommends that there should be a prohibition on gambling online (and indeed offline, see above) using money that the gambler does not have, i.e. using a credit card.** There should also be a **license condition which means that sites with a UK license cannot take bets between midnight and 6 am**, a time when problem gamblers are particularly vulnerable.
19. Research suggests that self-exclusion is associated with favourable psychosocial effects, including a reduction in problem gambling.¹⁶ CARE advocated for a “one stop shop” system of self-exclusion online during the debates on the Gambling (Licensing and Advertising) Bill in 2013 and 2014. We note that

¹¹ [http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(17\)32333-4.pdf](http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(17)32333-4.pdf)

¹² <https://about.gambleaware.org/media/1637/2017-12-12-young-people-and-internet-safety-final.pdf>

¹³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/650949/Internet_Safety_Strategy_green_paper.pdf, page 44

¹⁴ Industry Statistics, April 2017-March 2017, Published Nov 2017, *Gambling Commission*, page 3

¹⁵ <http://live-gamblecom.cloud.contensis.com/PDF/survey-data/Gambling-industry-statistics.pdf>

¹⁶ Gambling behaviour in Great Britain in 2015: Evidence from England, Scotland and Wales, Anne Connelly, Hoolie Jones, Natalie Maplethorpe, Annemijin Sondaal, Heather Wardle, *National Centre for Social Research (Natcen)*, August 2017, Prepared for the Gambling Commission. Page 2, Table 3.3, and text on pages 30-1 and Table 4.5, pages 44-5 <http://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2015.pdf>

¹⁶ Hayer and Meyer (2011) Internet self-exclusion: Characteristics of self excluded gamblers and preliminary evidence for its effectiveness. *International Journal of Mental Health and Addiction*, 9, 296-307

in March 2015, the Gambling Commission produced outline details of how a multi-operator exclusion scheme (MOSES) would work for online gambling, as required by section 3.5.5 of the licensing code¹⁷ and that in June 2017, the Commission announced that the scheme would be known as GAMSTOP and is being developed by the Remote Gambling Association (RGA).¹⁸ While CARE welcomes these announcements, we are disappointed by the delays in implementing the scheme that was first promised by the Government in the Gambling (Licensing and Advertising Bill) debates in March 2014. We look forward to the scheme being up and running in March 2018, as stated by the Minister in a debate on 23 November 2017.¹⁹ However, CARE raises a number of points in relation to GAMSTOP:

- i) There needs to be reassurance that this multi-operator scheme will be designed and implemented robustly so we do not see any repeat of the problems with some of the self-exclusion schemes set up by individual operators. In August 2017, gambling firm 888 was fined £7.8 million after more than 7,000 people who had self-excluded were still able to access their account.²⁰
- ii) Protections need to be in place to ensure that a problem gambler cannot circumvent the self-exclusion by creating additional online identities.
- iii) It will be important to monitor the two-tier scheme where GAMSTOP runs alongside the individual websites' programmes for self-exclusion to make sure this works and does not undermine the efficacy of GAMSTOP.
- iv) We are also concerned that while in principle section 1.1.2 of the Gambling Commission's Codes of Practice requires licensed websites to ensure that any third parties (i.e. tipsters and affiliates) act in the same way as a licence holder themselves, in practice, the activities of tipsters and affiliates, who are active on social media, may still mean they are able to contact individuals who have self-excluded. **CARE recommends that the Government reviews the role of tipsters in gambling advertising.** We welcome the Gambling Commission work with GambleAware outlines in para 5.80 to develop user-friendly guides to limit exposure to social media advertising and **recommend that this should be part of the Social Media Code of Practice under the Internet Safety Strategy.**

Link with the Internet Safety Strategy

- 20. **CARE recommends that the Internet Safety Strategy should include the risks associated with online gambling for both adults and children and that the renamed UKCIS (UK Council for Internet Safety) should monitor the implementation of GAMSTOP, including the role of tipsters and affiliates, alongside the Gambling Commission.**

Financial Transaction Blocking

- 21. In December 2016, CARE argued that a further key social responsibility provision the Government should introduce was increased transparency over how many overseas websites were operating in the UK without a licence. CARE had argued for a statutory framework for financial transaction blocking during the passage of the Gambling (Licensing and Advertising) Bill, but the Government countered that this was not necessary because financial transaction providers had given an undertaking that they would not process transactions if directed not to do so by the Gambling Commission. This process, however, is completely lacking in transparency. Even now there is no regular update on unlicensed websites operating in the UK nor the number of times transactions which are blocked further to direction from the Gambling Commission. **CARE recommends that the Gambling Commission should be required to provide an annual report outlining its activities for engaging with gambling sites seeking to access the UK market without a Gambling Commission license, including the range of**

¹⁷ <http://live-gamblecom.cloud.contensis.com/PDF/Briefing-note-on-the-national-online-self-exclusion-scheme.pdf>
¹⁸ <https://www.rga.eu.com/gamstop-announced-as-the-brand-name-for-uk-national-online-self-exclusion-scheme/>
¹⁹ Hansard, House of Lords, 23 November 2017, col 378, <https://hansard.parliament.uk/pdf/lords/2017-11-23>
²⁰ <https://www.theguardian.com/society/2017/aug/31/gambling-firm-888-fined-online-bookmaker-problem-gamblers>

financial transaction providers with which it engages and the number of occasions that it has directed them not to process transactions.

Q13. On the whole, do you support this package of measures to address concerns about gambling advertising?

22. Yes, but the Government should go further. Statistics published by the Gambling Commission on 14 November show that public trust in gambling is falling dramatically from 49% in 2008 to just 34% in 2017. The report in question also observed that: *“There are also significant public concerns about the volume, nature and scheduling of gambling advertising and the impact this could have on future generations.”*²¹
23. CARE is concerned that **very young children** are being targeted by gambling companies with websites that contain cartoon characters and free, or very low cost, play;²² and that these websites are able to circumvent legislation by claiming the sites are intended for adults. For instance, *The Times* reported that *“Clive Hawkswood, chief executive of the Remote Gambling Association, which represents operators in the online market, said companies were not deliberately targeting children, but said some nostalgic games might inadvertently be attractive to them”*.²³
24. CARE is also concerned that young people, **11-16-year olds**, have been exposed to gambling advertising online with 77% seeing ads on social media websites and 66% on other websites.²⁴ **The long-term impact of this level of exposure to advertising at a young age is unknown** so we welcome the Gambleaware research in this area (paras 5.62 and 5.88). 11% of 11-16-year olds report that they have played gambling-like games online (free and without prizes). The most common way for young people to play an online gambling-style game is using an app on a smartphone or tablet (73%).²⁵ The Gambling Commission itself recently stated *“new technology is providing children with opportunities to experience gambling behaviours through products, such as free-to-play casino games, social media or within some computer games, which do not have the same level of protections or responsible gambling messages as regulated gambling products.”*²⁶ In December, *The Guardian* reported on gambling apps that do not use money per se that can be accessed via Facebook without age verification checks.²⁷
25. Evidence suggests that *“there is an association between early gambling participation and problem gambling in adulthood”* (see paragraph 3.23 of the consultation). Professor Mark Griffiths, of the international gaming research unit at Nottingham Trent University has said, *“Research has shown that when we look at those children who are problem gamblers, the No 1 risk factor is playing games online for free.”*²⁸ We welcome the recent letter on gambling advertising targeting,²⁹ but believe this does not go far enough, especially in respect of children and young people where the gambling is “free”. **CARE recommends that the Government should go further and amend the Gambling Act 2005 to prohibit making online gambling games available to under 18s, even when there is no exchange of money.** These sites should be subject to the Gambling Commission licensing conditions so that the same rules on advertising and age verification checks apply, with the same level of protections and responsible gambling messages as regulated gambling products.

²¹ Gambling Commission, Strategy 2018-2021, pages 2 and 6 <http://www.gamblingcommission.gov.uk/PDF/Strategy-2018-2021.pdf>.

²² 8 October 2017, <https://www.thetimes.co.uk/article/cartoons-lure-kids-to-online-gambling-vr6c83np6>

²³ 8 October 2017, <https://www.thetimes.co.uk/article/peter-pan-and-friends-hook-children-on-web-gambling-j27d68jzx>

²⁴ Young People and Gambling 2017, A research study among 11-16 year olds in England and Wales, December 2017, pages 31 and 32 <http://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Levels-of-participation-and-problem-gambling/Young-persons-survey.aspx>

²⁵ *Ibid*, pages 4 and 5

²⁶ <http://www.gamblingcommission.gov.uk/news-action-and-statistics/news/2017/Children-experiencing-gambling.aspx>

²⁷ <https://www.theguardian.com/society/2017/dec/27/gambling-style-apps-offered-on-facebook-without-age-checks>

²⁸ 8 October 2017, <http://www.dailymail.co.uk/news/article-4961078/Online-bookies-use-cartoons-target-children.html>

²⁹ <http://www.gamblingcommission.gov.uk/PDF/Ltr-from-ASA-CAP-CG-RGA-final.pdf>

26. We agree that with the proposals in para 5.74 to **make compliance with the CAP/BCAP advertising codes a requirement of the Licence Conditions.**
27. **We recommend that restrictions on the promotion of gambling to children should be included in the Gambling Commission's Licensing Codes;** in particular social responsibility code 3.2.11 should include the requirement to *'not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture'*, which already apply in the non-remote SR measures (see paras 3.2.1, 3.2.3. 3.2.7).³⁰ **It is indefensible not to include this requirement for remote operators, especially given the evidence above.**
28. In addition, **CARE recommends that the Internet Safety Strategy should state clearly that promoting online gambling to children and facilitating online gambling by children are unacceptable, regardless of whether or not the gambling in question involves real money.** While we recognise that that advertising codes already apply to social media and that a clear message has been given in the letter of 20 October (referred to above), given the number of young people who have seen gambling adverts on social media, **we recommend that restrictions on promotion of gambling to children should be included in the new social media code of practice (section 5.1 of the Internet Safety Strategy).**

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

29. Yes. CARE believes that the system of the voluntary levy is not working well. Last year only £8 million, 0.06% of GGY (Gross Gambling Yield) was donated, less than the 0.1% which is the expected minimum. As Lord Foster of Bath noted in the House of Lords during their gambling debate on 23 November 2017: *"We have had one for horseracing since 1961, and next year it is estimated that it will generate £90 million. This means that the gambling industry will statutorily donate 10 times more to look after horses than it voluntarily gives to look after people. Staggeringly, the voluntary levy for greyhounds raises almost as much—at £7.5 million—as the voluntary levy to support people, so far more is raised for horses and greyhounds than for people. It is tempting to think that the industry believes in the maxim, "four legs good, two legs bad"."*³¹
30. The industry has been given years to get its house in order voluntarily but has failed to do so. **The powers to introduce a statutory levy that are in the Gambling Act 2005 must now be used.** The levy must be sufficient to pay for: the treatment of all problem gamblers who request it; research into problem gambling; and strategies to prevent people becoming problem gamblers in the first place. The £45 million per annum suggested by GambleAware is a minimum, amounting to just 0.3% of GGY.
31. A levy would have public support. In the ComRes polling that is referenced at the beginning of our submission, 66% of men (61% of men and women) think that the UK Government should make it compulsory for all gambling companies to pay a larger and equitable proportion of profit or turnover towards funding help for problem gamblers. Just 20% disagree (21% of men and women).³²

Q15. Do you agree with our assessment of the current powers available to local authorities?

³⁰ <http://live-gamblecom.cloud.contensis.com/PDF/LCCP/Licence-conditions-and-codes-of-practice.pdf>
³¹ <https://hansard.parliament.uk/pdf/lords/2017-11-23>, Cols 372-3

³² Had it been possible to communicate, without making the polling question too complicated, that Parliament actually gave Ministers this power in 2005 (courtesy of Section 123 of the Gambling Act) the but that it has not yet been used, one would expect that the figures would have been even stronger.

32. No. CARE has supported the call by local councils to have more control of the number of B2 machines that are in their communities by restricting the number of betting shops. CARE supports the LGA call for cumulative impact tests to be introduced to enable councils to reject applications for new betting shops where there are already existing clusters of shops and for licensing laws to be updated to allow councils to take health issues associated with problem gambling and anti-social behaviour concerns into account when considering applications.³³

Q16. Are there any other relevant issues, supported by evidence, that you would like to raise as part of this consultation but that has not been covered by questions 1-15?

33. CARE raised concerns about skins gambling at Question 8 (paragraphs 35-37) of our previous submission. Since then, the Gambling Commission has published the results of a question on skins gambling in its survey of young people's gambling habits, which showed that 20% of boys have said that they have been involved with "skins gambling"! They have also published their final advice on skins gambling; stating that, "*Where facilities for gambling are offered using such items, a licence is required in exactly the same manner as would be expected in circumstances where somebody uses or receives casino chips as a method of payment for gambling, which can later be exchanged for cash*" BUT noted that many of the sites are 'unregulated'.³⁴
34. However, these "unregulated" sites are **allowing children to gamble which is contrary to the Gambling Act 2005. Action to ensure these sites are licensed should be taken immediately.**³⁵ Sites that do not comply must be subject to financial transaction blocking, courtesy of the Commission's arrangement with the financial transaction providers. Such is the seriousness of the risk posed by skins gambling that **CARE also recommends that the Gambling Commission should report every six months on the evidence of the number of UK children and young people engaged in skins gambling, the sums of money being bet and lost and the types of gambling and websites (licensed and unlicensed) involved** Such a report would increase transparency for parents and policy makers about what is happening in a rapidly changing market and provide information for appropriate action by parents, policy makers and industry. Indeed, there should be more done to support parents as they seek to manage the potential hazards of so-called "skins gambling". We welcome the fact that the Gambling Commission addresses skins gambling in its advice for parents,³⁶ and says it is continuing to take action against such sites but this issue needs to be highlighted for parents by the Commission and under the Internet Safety Strategy.
35. In concluding our response to this consultation, CARE raises again the point that we made in December 2016, that under section 1 of the Gambling Act 2005³⁷ none of the licensing conditions have as their objective to encourage industry growth (something the Government mentions in para 5.58), but there is a licensing objective to "*protect children and other vulnerable persons from being harmed or exploited by gambling.*" **The Government and Gambling Commission should not be cautious about adding to the license conditions, requirements that will protect children and the vulnerable.**

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³³ Maximum stakes on fixed odds betting machines needs reducing, councils urge, Local Government Association, 22 April 2016 http://www.local.gov.uk/media-releases/-/journal_content/56/10180/7799742/NEWS

³⁴ Virtual currencies, eSports and social casino gaming – position paper, March 2017, paras 3.8, 3.12-3.16, <http://www.gamblingcommission.gov.uk/PDF/Virtual-currencies-eSports-and-social-casino-gaming.pdf>

³⁵ Crackdown on gamers' gambling, Video game makers under pressure over 'skins' betting, *The Times*, 27 August 2017, <https://www.thetimes.co.uk/article/crackdown-on-gamers-gambling-trl2dt7s8>

³⁶ <http://www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Consumer-guides/Gambling-safely-guidance-for-parents.aspx> Website accessed 5 December 2017

³⁷ Section 1, Gambling Act 2005, <http://www.legislation.gov.uk/ukpga/2005/19/section/1>