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Department for Domestic Gambling and Sport

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Dear Mr ██████████

I welcome the UK Government's consultation on proposals for changes to gaming machines and social responsibility measures. Whilst I recognise that most people who participate in gambling activities do so without any significant problems, for others gambling is problematic; causing damage to their health and to wider society.

In Wales, 1.1% of the population (30,000 people) self-reported as having a problem with gambling<sup>1</sup>, and a further 3.8% of people in Wales are estimated to be at risk of problem gambling<sup>2</sup>.

The harm caused by gambling is unequal in distribution, with those who are economically inactive and living in deprived areas suffering the most harm<sup>3</sup>. In addition, not all gambling exposes people to the same level of gambling harm with research suggesting that some forms of gambling, including mechanised gambling, are associated with higher levels of gambling-related harm<sup>4,5</sup>. The complexity of gambling means that individuals experiencing severe harm from gambling often gamble using several different products and channels<sup>6</sup>.

Gambling related harm is increasing the burden on health services as problem gamblers are twice as likely to consult their GP for mental health concerns, five times as likely to be hospital inpatients, and eight times as likely to access psychological counselling when compared with people who do not identify as problem gamblers<sup>7</sup>.

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<sup>1</sup> Using either the Problem Gambling Severity Index (PGSI) or the Diagnostic and Statistical Manual of American Psychiatric Association (DSM-IV).

<sup>2</sup> Gambling Commission, 2016. Participation in gambling and rates of problem gambling – Wales 2015.

<sup>3</sup> Wardle, H., Keily, R., Astbury, G. and Reith, G., 2014. 'Risky places?': Mapping gambling machine density and socio-economic deprivation. *Journal of Gambling Studies*, 30(1), pp.201-212.

<sup>4</sup> Reith, G. and Dobbie, F., 2011. Beginning gambling: The role of social networks and environment. *Addiction Research & Theory*, 19(6), pp.483- 493.

<sup>5</sup> Breen, R.B. and Zimmerman, M., 2002. Rapid onset of pathological gambling in machine gamblers. *Journal of Gambling Studies*, 18(1), pp.31-43.

<sup>6</sup> Conolly, A., Fuller, E., Jones, H., Maplethorpe, N., Sondaal, A., and Wardle H.

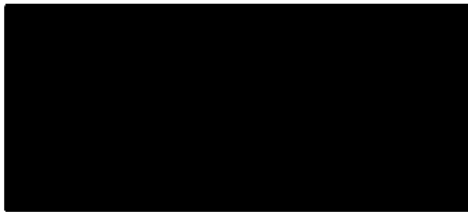
<sup>7</sup> Cowlshaw, S., Gale, L., Gregory, A., McCambridge, J. and Kessler, D., 2017. Gambling problems among patients in primary care: a cross-sectional study of general practices. *Br J Gen Pract*, p.bjgp17X689905.



My forthcoming annual report dedicates a chapter to this emerging public health issue. In it I recommend a range of measures to combat the public health effects of problem gambling. This includes taking robust action on fixed odds betting terminals and introducing all evidence-based player protection options. I therefore strongly support UK Government taking firm action here and the commitment to resist pressure from the industry to increase stakes and prizes across many categories of gaming machines. I agree with the proposals in the consultation document and a reduction to the maximum stake for category B2 gaming machines to £2. My individual responses to each of the consultation questions are provided in the Annex.

I look forward to reviewing the outcome of this consultation when it is published later this year.

Yours sincerely



**DR FRANK ATHERTON**

**Annex: Consultation response form**

## **Annex**

**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?** Yes. I support the alternative maximum stake for B2 machines of £2.

**Q2. Do you agree with the government's proposals to maintain the status quo on category B1?** Yes.

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

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

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

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

**Q7. Do you agree with the government's proposals to maintain the status quo on category D?** Yes.

**Q8. Do you agree with the government's proposals to increase the stake and prize for prize gaming, in line with industry proposals?** The proposed increase in stake is not proportionate to the proposed increase in prize; the industry seems to gain from this proposal, rather than the user.

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

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

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

**Q.12 Do you support this package of measures to improve player protection measures for the online sector?** Yes, but the Gambling Commission should consider the more urgent action of limiting or banning free bets and other similar promotions.

**Q.13 Do you support this package of measures to address concerns about gambling advertising?** The proposed package of measures goes some way to address concerns about gambling advertising but I would also welcome measures that place further limits on the volume of advertising currently visible across the range of media outlets.

**Q.14 Do you agree the Government should consider alternative options including a mandatory levy if industry does not provide adequate funding for RET?** Yes, I strongly support a mandatory levy.

**Q.15 Do you agree with our assessment of the current powers available to local authorities?** Yes, we agree with the UK Government's assessment that town and country planning has sufficient existing legislative processes to successfully contribute to gambling

issues, specifically Local Development Plans which provide the framework for development management decisions. However, better availability and accessibility of evidence could improve the plan making process in relation to gambling issues.

**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? No.**