

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

Response from the Presbyterian Church of Wales. January 2018

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

Yes. We note the widespread concern across society about FOBT machines as expressed in Parliament over several years, by charities and campaign groups and other churches, and by the public in response to two questions asked in the British Social Attitudes Survey since the Gambling Act was passed. We also note that the fact that there were three Royal Commissions in the twentieth century and a major gambling review leading to the Gambling Act 2005 shows the seriousness and controversy surrounding the subject.

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

We support a maximum stake of £2 as it is the lowest possible one. We note the complete lack of evidence for the effectiveness of lowering the stakes to £20 or £30, let alone £50 as these are still far too high, and players would probably decide to spend more time gambling. Thus only lowering the stakes to one of these levels could actually worsen problem gambling and the ensuing problems for players and their families. It is significant that the Responsible Gambling Strategy Board has admitted that £50 is already the limit for many players. The real reason for this is that players now have to check in with staff before staking over £50 in a session. The consequence of this was an increase in bets between £40 and £50.

The truth is that £2 is the maximum stake for all other high street machines. A £2 maximum would reset the whole system to where the Gambling Act meant it to be: a series of steps, starting with shops where any adult can walk in, with the least risky games, and moving up to less accessible venues with more security, support and control.

All in all our response is based ultimately on the fact that the cost of gambling to the public purse and to public health is enormous as it generates mental illness, debt and its consequences, homelessness and housing problems for addicts and their families, greater family strife and breakdown and even domestic violence. There is also an effect on children, including children and teenagers who gamble themselves. In this respect it is disappointing that the consultation document merely pays lip-service to recognition of the problem that gambling causes to families (1.3). As Gambling Watch UK say in an initial comment on the consultation relatives are ‘the largest stakeholder groups who are harmed by gambling.’

<http://www.gamblingwatchuk.org/resources/78-uk-news/142-government-s-disappointing-consultation-document>

Overall the costs and effects are not unlike those caused by alcoholism. We note the major report published by IPPR in 2016, ‘Cards on the Table: The cost to government associated with people who are problem gamblers in Britain’.

[https://www.ippr.org/files/publications/pdf/Cards-on-the-table\\_Dec16.pdf](https://www.ippr.org/files/publications/pdf/Cards-on-the-table_Dec16.pdf)

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

No, because we are unhappy with the status quo and do not want to see the maximum progressive jackpot raised at all.

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

No, because we want to see the maximum stake limit fixed at £2.

We see no reason to raise it to £2.50; in particular, increasing the tax take is not sufficient to outweigh the arguments previously noted.

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

No, because we are unhappy with the status quo and want to see reduced stakes.

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

No, because we are unhappy with the status quo and want to see reduced stakes.

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

No, because we are unhappy with the status quo and want to see reduced stakes.

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

Yes, we think the status quo should be maintained. The proposal that the maximum stake should be raised is linked to a claim that income from gaming machines is essential to maintain the economic viability of pubs. This is not sufficient reason. In particular it is problematic because of the link to increased alcohol sales and therefore to alcoholism, a huge social problem that we believe is a comparator for gambling addiction.

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

No we don't. We think the government should resist such demands from the industry in order to be morally consistent with the rest of its proposals. The government itself needs to take responsibility for 'the social responsibility agenda' in this area rather than letting the industry take the lead. We are especially concerned with this because prize bingo tends to be found in amusement arcades in relatively deprived seaside towns. Overall we are very concerned about the effect that gaming machines have in the least well-off in society.

**Q9. Do you agree with the government's proposals to maintain the status quo for 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. Contactless payments are too easy to make and too often those processing payments make contactless payments on behalf of customers without asking them how they would like to pay. Barring contactless payments introduces a hurdle for decision-making and returns responsibility fully to the card owner. This would be consistent with the fact that credit and debit cards are no longer allowed anyway.

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

Yes

**Q12. Do you support this package of measures to improve player protection measures for the online sector?**

Yes

We note that the online sector is a particular temptation for gamblers as it is available 24/7 and players can use credit cards whilst alone at night when nobody else is around. The online sector is a serious problem as it constitutes one third of the entire gambling sector and because of the particular features mentioned is particularly associated with problem gambling.

We believe the government needs to go further and to ban gambling online with a credit card, which would significantly reduce the possibilities for online gambling.

The government should ban gambling sites with a UK licence from taking bets during the night, e.g. between 11 p.m. and 7 a.m.

**Q13. Do you support this package of measures to address concerns about gambling advertising?**

Yes. We note that the Local Government Association has called for this as well.

We note that in 5.45 it is said that 'gambling-related harm is harder to measure'. Below in our response to Question 16 we ask that this problem is addressed.

We are disappointed that the same paragraph does not provide evidence for the claim that 'children's participation in gambling and their level of problem gambling have declined since 2007.' Given that measures of gambling-related harm are scarce for all ages there is no room for complacency about children.

We call on the government to amend the Gambling Act 2005 to extend the prohibition on making online gambling games available to under 18s when there is no exchange of money.

We want online sites that offer free gambling games to be subject to the same licensing conditions of the Gambling Commission as sites offering exchange of money. This is so that they come under the same rules for age verification, advertising, protection levels and responsible gambling messages.

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

Yes

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

No. We want local authorities to have more powers given that the Local Government Association wants Cumulative Impact Assessments to be introduced in order to better understand the effect that shops have on the local community and on local businesses. Specifically we agree with Rethink Gambling's objective that 'any proposed new form of gambling, mode or type of venue, should be subject to a full social, health and economic impact assessment' to avoid the mistakes made by allowing FOBTs into high street shops.  
<http://rethinkgambling.org/aims-and-objectives/>

In principle we would like to see the Welsh local authorities given powers similar to those in England to require a planning application for change of use of a building to a betting shop or the development of new betting shops. This would be a matter for the Welsh Government to decide as it has power over planning law in Wales.

**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?**

Gambling is proven to be a major public health problem across Britain, as evidenced by the survey published by the Gambling Commission in 2015 referenced in the consultation document.

<http://www.gamblingwatchuk.org/resources/78-uk-news/141-gambling-a-big-public-health-problem-neglected>

We are pleased that the consultation document says (5.96) that the Department of Health working with Public Health England are considering research on the impact of problem gambling on health. Such research is long overdue. We also consider it very important that research should be independent of the gambling industry and peer-reviewed, given the obvious interest the industry has in continuing the status quo, which creates conflicts of interest.

We note that there is very little evidence regarding annual numbers of people treated for problem gambling-related issues on the NHS in England and Wales or formally diagnosed in this respect. We understand that it is difficult to detect problem gambling from initial questionnaires and surveys asked by GPs and nurses, whereas alcohol and drug addiction may be easier to detect. The following research paper proves our point and suggests ways forward for GPs.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3063014/>

We understand that people with gambling problems tend to have mental, behavioural and financial problems and so we would like to see the different levels of government work together to find a suitable way of measuring and recording problem gambling across the NHS in England and Wales.

We want the Gambling Commission to report regularly on evidence for the number of children involved in 'skins gambling', the amounts of money being bet and lost and the types of sites accessed.