

## **The Royal Society for Public Health**

### **Response to UK Government consultation on proposals for changes to gaming machines and social responsibility measures**

The Royal Society for Public Health (RSPH) is an independent, multidisciplinary charity dedicated to the improvement of the public's health and wellbeing. We have a membership of over 6000 public health professionals encompassing a wide range of sectors and roles including health promotion, medicine, environmental health and food safety. Our vision is that everyone has the opportunity to optimise their health and wellbeing, and we seek to achieve this through our qualifications, conference and training programmes and policy and campaign work.

RSPH are associate members of the APPG on FOBTs and have long supported the campaign to tackle gambling related harm.

#### **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?**

We agree that the maximum stake of £100 on B2 machines (FOBTs) should be reduced. In line with widespread support for this measure across the political spectrum, the ADPH and local authorities, we support a maximum stake of £2.

GambleAware research has found that areas containing a high density of machines tend to have greater levels of income deprivation and more economically inactive residents and as outlined by the government, 'there are still large numbers of higher-staking machines in accessible locations, often in more deprived areas, where it is possible to lose a large amount of money very quickly'.

A report published by the Centre for Economic and Business Research (Cebr), found that those on lower incomes or in deprived areas are the main beneficiaries of a reduction to a £2 stake. Furthermore, the Respublica report 'Wheel of misfortune: the case for lowering the stakes on FOBTs' argues that FOBTs have contributed increases in problem gambling and that FOBTs divert expenditure from more productive parts of the economy.

On this basis, we believe that whilst reducing the stakes on FOBTs is just one step in tackling problem gambling, the reduction to a £2 stake will improve player protection of the most vulnerable and have an overall positive effect on public health, health inequality and the economy.

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

As credit and debit cards cannot now be used for gambling machines at all, we agree with the government position that this would be 'a backward step in the protection of vulnerable players'. Encouraging players to insert cash can support players in maintaining some control over their activity, whereas by introducing contactless payments, there is potential for more money to be lost through quicker play. Contactless payments would also limit time spent by players thinking through their decision to gamble. Therefore, we agree with the government's proposals to bar contactless payments as a direct form of payment to gaming machines.

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

N/A

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

N/A

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

N/A

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

We agree that the Government should consider alternative options if industry does not provide adequate funding for RET. Investment is intrinsic in ensuring appropriate and effective player protection systems are in place to minimise the risk of harm from gambling, support relevant research to build the evidence base, and campaign to raise awareness of the risks of gambling. Furthermore, investment is needed to provide adequate funding to support services to those at risk of or experiencing harm. Nonetheless, we hold that it is only right that the industries causing health and

wellbeing harm should pay to minimise that harm, especially at a time when limited public funds are available.

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

N/A

**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?**