

2/19/2018



Dear [REDACTED]

RE: Submission to DCMS review of gaming machines, advertising and social responsibility

We are grateful to have the opportunity to make representation to this review of gambling regulations in Great Britain.

We consider that regular reviews are important if the Government's policy objective of encouraging socially responsible growth and protection of the vulnerable are to be met. We recognise that it is unfortunate that this review has been delayed by external events and that it has taken place against a backdrop of such controversy. While we support the broad principles behind the Government's proposals, we are concerned about some of the specific recommendations:

- 1) We are disappointed that the Government has not put forward NCF's proposal for an increase in the maximum number of gaming machines (currently 20 per casino regardless of size of visit levels) for consideration as an option. In the absence of any opinion on this subject being sought from the Responsible Gambling Strategy Board, it does not appear to us that this proposal has been properly considered – and its rejection appears arbitrary rather than scientific.
- 2) It is not clear to us why consideration of the question of an increase in machine numbers must wait until after a small set of moderately effective (but complex) social responsibility measures (limit-setting, player tracking and diagnostic algorithms) has been implemented. To be clear, these are measures that we had in train prior to the publication of the Government consultation document; it is simply not clear to us how the Government has established contingency to machine reform. We would welcome greater clarity from the Government as to what it expects to happen and what results it hopes to see as a result of implementation of these measures.
- 3) We are concerned that the Government's narrow focus on a small set of (moderately effective) social responsibility measures may miss the point that effective programmes are likely to be multi-faceted and involve a large number of checks and safeguards. With this in mind, it is not clear to us why the Government appears to have ignored the strong concerns raised by the RGSB on single-staffing in betting shops.

We would welcome the opportunity to engage with the Government to discuss these matters at greater length or to respond to specific questions if any such arise.

Yours sincerely

[REDACTED]

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