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

Response by the Evangelical Alliance UK

Background

The Evangelical Alliance UK (hereafter 'the Alliance') is the largest and oldest body representing the UK's two million evangelical Christians. Formed in 1846, we currently work across a diverse constituency of 81 denominations, 4,000 churches, 600 organisations and thousands of individual members. Members include those from both denominational and independent churches. Along with other churches and faith groups, the Alliance has been concerned for a long time about the risks associated with gambling and the impact it can have on individuals, families and wider communities.

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 believe that the maximum stake of £100 on B2 machines must be dramatically reduced, and we support at £2 maximum stake for these machines. Along with other churches and faith groups, the Alliance welcomed this call for evidence on reducing the maximum stake. The high maximum on B2s can be connected with problem gambling and criminal behaviour around these machines. The £100 maximum is also a significant anomaly among other forms of high-street betting.

B2 machines are strongly linked to problem gambling. According to GamCare's most recent statistics, machines in betting shops remain a major problem for people accessing their helpline, and for those receiving counselling.¹ The consultation document also highlighted evidence that there is still a high number of problem or at-risk gamblers using machines in betting shops.

In addition, betting shops are still disproportionately affected by crime, intimidation and anti-social behaviour. This includes vandalism after large losses, abuse of staff, robbery and money laundering. These dangers are exacerbated by the fact that betting shops are often staffed by no more than one person. We believe that a

¹ http://www.gamcare.org.uk/sites/default/files/file_attach/Briefing%20Paper%20-%20GamCare%20Annual%20Statistics%202016-17.pdf

number of these dangers are also tied to a high maximum stake.

Betting shops containing FOBTs also tend to spring up rapidly in deprived communities - often multiple shops from a single chain to maximise the number of FOBTs permitted. This means that those who are already impoverished are also most exposed to FOBTs and most at risk of problem gambling.

A maximum stake of £50 is clearly not a sufficient limit. Players already need staff approval to make bets over £50, and this reduction would therefore have only minimal impact on play. A £30 or £20 maximum would still leave B2s significantly out of step with other gaming machines. This disparity presents a challenge to players in how they keep track of what they are playing and how much money they stand to lose, and contributes to the other problems mentioned above. As a result, there is widespread support for a £2 maximum from local authorities, the Local Government association, the Church of England and others. We also support this £2 maximum stake.

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

We agree with the Government's proposal not to act on industry recommendations of an increase.

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

We agree with the Government's proposal not to act on industry recommendation of an increased maximum stake. There has been a rapid growth in the number of B3 machines, as the consultation document points out (paragraph 3.20). Given the likelihood of a significant change to the B2 maximum stake, continuity in other areas is the best option, so that this change can be properly assessed. Once evidence has been collected, we would support the Government making further reviews to B3 machines on both stake size and player protection.

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

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

We agree with the Government's decision not to make any changes in this area.

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

We agree with the Government's proposal not to increase the stake on category C machines. We believe that as these machines are permitted in pubs, there are higher risks of problematic gambling associated with them. This is due to the availability of alcohol and the lack of supervision of the betting machines specifically in these venues. The circumstances are different in a licensed betting office (LBO), and so it is right for the maximum stake on a category C machine to be lower than other machines not permitted in pubs.

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

We agree that the maximum stake ought not to be raised on category D machines. Through category D machines, as the consultation document notes, Great Britain is the only country which allows under-18s to participate in such gambling. We believe that such access to gambling poses a number of problems and should be reviewed.

While the consultation document argues that problem gambling rates among young people are low and static (around 0.4%), we believe that it is a tragedy if any young person is caught up in problem gambling at such a formative stage. Here the effects of addiction can have even more disastrous consequences than later in life. Arguably the position on this form of gambling is also out of step with increasing caution in other areas (such as online) when it comes to the risk and impact of addiction for young people (see answer to question 12).

In addition, such access to gambling normalises it among young people by making this form of gambling (and by extension other forms) seem harmless, and by associating it with positive early memories. Alongside ever-increasing exposure to gambling-related advertising (see question 13 below), this creates a climate in which gambling is seen as less risky and more normal than it actually is. With these points in mind, we urge the Government not to increase maximums on category D machines, and also to consider raising the age limit for using them to 18.

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

We disagree with the proposal to increase the stakes and prizes for prize gaming. We believe that the lack of supervision in prize gaming is a more significant factor for

deciding stake level than the size or decline of the industry. In addition, we have reservations about all forms of gambling which are accessible to children, for the same reasons given in response to the previous question. As such, we cannot support the proposed increase.

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

We agree with the proposals not to act on industry recommendations for casinos. The consultation document highlights a number of additional risk factors in casinos, such as 24-hour opening, ease of access and the availability of alcohol. We agree that there needs to be more evidence of enhanced player protection before any further changes are considered. Some of these concerns (alcohol, ease of access) also apply in pubs, and for that reason we also support not increasing the allocation for pubs. On adult gaming centres, we also support the Government's argument that a new category of machine would need a much greater understanding of the risks that this would create. As with other changes, it would be much wiser to assess the impact of a reduction in the maximum stake on B2s than introduce further changes that could create additional risks. We therefore support the Government's caution in this area.

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

We agree with the Government's decision to bar contactless payments. We do not accept the idea that betting shops must keep up with other high street shops in this way, or that gambling should be as easy as other high-street activities. The additional risks associated with gambling make it unwise to see it as simply another leisure activity. Contactless payments, and indeed the use of credit or debit cards, reduce awareness of the amount of money spent, and provide fewer opportunities for people to stop and reflect on this. As a result, we agree with the Government's assessment that this would be a backward step in protecting players.

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

We agree that significant and consistent player protection measures are a vital accompaniment to action on stake reduction in efforts to tackle problem gambling. We support the suggestions that have been made, including 'hard stops' when

voluntary limits are reached, and mandatory alerts at particular time and spend benchmarks. These would increase player self-awareness, and help those who recognise their own vulnerability to problem gambling to manage their play.

We also support the prohibition of mixed play between B2 and B3 games on the same machine. Mixed play leads to higher losses for players, and is linked to problem gambling. Banning mixed play would help to ensure that players are more conscious of what they are playing and how much they may be losing.

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

Online play poses significant risks of gambling related harm, and as the online sector grows rapidly, it is vital to keep this sector under review. Additional risks from online gambling arise from its accessibility at all hours of the day, and the isolation from supervision which go with playing online. We believe that it is important for there to be consistent standards and protections online as well as offline.

We agree that there are key presenting issues online which need further action, such as free bets and sign-up offers. Regulatory bodies should continue to monitor online gambling rigorously, and consider all necessary measures to tackle abuse. However, we also believe that online stake limits should be considered, given their existence for offline gambling.

We agree with the consultation document that the multi-operator online self-exclusion system should be introduced and publicised as soon as possible. Self-exclusion from betting shops is a useful measure which problem gamblers can take to manage their addiction. However, this is undermined without similar measures being available online.

In relation to young people, concern is growing around the dangers of the online sphere. For example, the report by the House of Lords Communications Committee, *Growing Up with the Internet*², noted evidence around video game addiction, and around young people being more susceptible to advertising. We welcome the fact that the Government is committed to taking this problem seriously, for example through digital literacy training in schools. However, such greater awareness of the dangers of addiction and normalisation must go hand in hand with a commitment to tackling addiction in other areas, including online gambling.

² <https://publications.parliament.uk/pa/ld201617/ldselect/ldcomuni/130/130.pdf>; paragraphs 80, 107-109.

Online gambling should therefore have a place within other strategies and initiatives dealing with online harms. The risks of online gambling should not be omitted from any revision to PSHE designed to develop digital literacy, as awareness of the risks of online gambling and discernment with regard to gambling advertising are clearly important aspects of staying safe online.

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

We support the planned 2-year advertising campaign on the risks associated with gambling. If successful, this may help to qualify the significant growth of gambling related advertising in recent years. As advertising enters new media and becomes harder to control completely, we recognise that providing alternative messages will be of vital importance, alongside robust regulation wherever that can be effective.

We continue to believe that a ban on gambling-related advertising before the 9pm watershed is justified. Advertising contributes to the normalisation of gambling in society, particularly among children and young people. The exception around sports events has prompted the rapid growth of gambling advertising in this area. We believe that this is too significant a loophole in existing regulation, and increases the exposure of children to gambling advertising.

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

We believe that research, education and treatment are vital concerns, and we support the proposal of a mandatory levy on the gambling industry. A levy on all companies would spread the cost more fairly, and help to remove concerns about the independence of the research that is commissioned.

On education in particular, we support additional investment in digital literacy and teaching on addiction (including problem gambling) in schools. Recent research has highlighted the increasing dangers of internet and gaming addiction for children and young people, as well as their vulnerability to targeted advertising.³ Education must therefore prioritise making young people resilient to addiction in all its forms.

³ As summarised, for example in *Growing Up with the Internet* - see question 12 above.

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

We disagree with the Government assessment that existing powers for local authorities are sufficient. The ‘clustering’ of betting shops in deprived areas poses greater risks to those who are already vulnerable, and shows that the existing powers are not enough. We have long maintained that local authorities need to be strengthened to tackle this clustering of betting shops in their local areas. On this we support the introduction of Cumulative Impact Assessments, as is the practice for alcohol licensing. We note that these powers are sought by several local authorities, as well as the Local Government Association. We are concerned that without additional powers, local authorities may be unable to devote sufficient resources to using their current powers effectively. We also hear that some local authorities may be cautious due to the possibility of legal challenge by the gambling industry. We therefore believe that a case can be made for increased powers, and recommend that the Government continue to explore this with local authorities.