

# Response to the House of Lords' Call for Evidence on Gambling

MISSION AND PUBLIC AFFAIRS COUNCIL

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## Table of Contents

	<b><u>Introduction.....</u></b>	<b><u>2</u></b>
	<b>Answers.....</b>	
	<u>Question One .....</u>	<u>3</u>
	<u>Question Two.....</u>	<u>5</u>
	<u>Question Three .....</u>	<u>8</u>
	<u>Question Four.....</u>	<u>10</u>
10	<u>Question Five .....</u>	<u>11</u>
	<u>Question Six.....</u>	<u>13</u>
	<u>Question Seven.....</u>	<u>14</u>
	<u>Question Eight .....</u>	<u>16</u>
	<u>Question 10.....</u>	<u>17</u>
	<u>Question 11 .....</u>	<u>18</u>
	<u>Question 12.....</u>	<u>20</u>
	<u>Question 13.....</u>	<u>20</u>
	<u>Question 14.....</u>	<u>23</u>
	<u>Question 15.....</u>	<u>24</u>
20	<u>Question 16 &amp; 17.....</u>	<u>27</u>
	<b><u>Bibliography.....</u></b>	<b><u>28</u></b>

# INTRODUCTION

## *What is the Mission and Public Affairs Council?*

The Mission & Public Affairs Council (MPAC) of the Church of England is the body responsible for overseeing research and comment on social and political issues on behalf of the Church.

The Council comprises a representative group of bishops, clergy and lay people with interest and expertise in the relevant areas, and reports to the General Synod through the Archbishops' Council.

## 10 *Why are we submitting this evidence?*

The Church of England is one of the largest grassroots organisations in the country, with a presence in every community. Being able to speak from the position of Parliamentarians, educators, as well as parishioners provides an opportunity for a fully holistic response.

The Church has previously engaged on gambling-related issues and the Ethical Investment Advisory Group of the Church has previously published papers on the subject. The General Synod, the legislative body of the Church, debated a motion on gambling in 2019 and this response builds on that debate.

## 20 *What questions are we answering?*

We are responding to 1-8, 10-15, and answering 16 and 17 together.

## *Who prepared this document?*

This document is submitted under the name of Mark Sheard, Chair of the Mission and Public Affairs Council, and prepared by Charles White in the department of Mission and Public Affairs.

## *Publication date?*

30 September 6, 2019.

## QUESTION ONE

*Are the three primary aims of the Gambling Act 2005 being upheld? They are to prevent gambling from being a source of crime or disorder, to ensure that gambling is conducted in a fair and open way, and to protect children and other vulnerable persons from being harmed or exploited by gambling.*

### **Answer:**

It is our opinion that the aims of the Gambling Act 2005 (The Act) are not being sufficiently upheld.

### **Background:**

- 10 The last major review of gambling was conducted in 2001 by Sir Alan Budd which became the foundation of the Act. The Budd report followed the 1994 introduction of the National Lottery which upended the consensus behind the earlier 1968 Act that gambling demand should not be stimulated.

Contemporary critics of Budd's report claimed it was too supportive of the industry. 'The Independent suggested the report read like a "bookie's wish list," and a report in The Mirror stated, "Gambling firms hit the jackpot"' (Orford, 2011: 21).

Budd's report, however, accepted the recommendations would be 'likely to lead to an increase in problem gambling' (Grant, et al, 2019: 21).

- 20 The resultant Act four years later incorporated the three aims as a bid to mitigate the concern Budd expressed in the report about rising levels of gambling-related harm.

First, the Act aimed to limit gambling becoming a source of crime and disorder. However, the public's experience of gambling since 2007 (when the Act came into force) has demonstrated this aim has not been upheld.

Delegates to the Church of England (CofE) General Synod in February 2019 described criminality linked with gambling. One person said a close friend 'had been arrested' after they 'defrauded millions' from members of the congregation. Adding:

'It emerged that millions of pounds had been spent on gambling websites. Over £1 million was spent on one website alone... Emotionally, it was a trauma' (Church of England, 2019: 704).

- 30 This snapshot of the damage gambling-related crime can do can be replicated across the country.

Other more visible signs of criminality can also be linked with gambling. Policies such as single staffing, where bookmakers have only one member of staff on duty, have been linked with violence.

A deputy manager of a William Hill shop said: 'It's normal for people to smash up the shop' and others have claimed crime goes unreported if Fixed-Odds Betting Terminals (FOBTs) are replaced (Lamont, May 31, 2016).

White-collar criminality, like money-laundering, is also frequently raised in discussion about British gambling.

Internationally, gambling is frequently linked with criminality. In 2017 the American FBI stated: 'The victim count and financial losses suffered as a result of online gambling surpassed that of terrorism-related cybercrimes last year' (Lincoln, August 19, 2018).

Secondly, the Act aimed to ensure gambling is conducted in a fair and transparent manner. Fairness in gambling is often discussed in terms of issues like withdrawal of funds, targeting of vulnerable people or allegedly opaque business practices.

The CofE however views concepts such as fairness holistically. In 2006 the Ethical Investment Advisory Group (EIAG) of the CofE was asked to investigate the ethics of investing in gambling-related companies.

10 Fairness is a core aspect of their work as it is linked with exploitation. It stated:

'...a culture of corporate despair and acquiescence in the huge divisions between rich and poor... are becoming entrenched in the global economy. Rather than being encouraged to invest together to improve their communities, people are tempted [by gambling] to seek individual escape' (Church of England, 2006: 23).

The group, supported by academics, found gambling normalised exploitation and investment in these companies would be wrong.

Gambling, it has been suggested, is intrinsically exploitative as it requires someone to win and someone to lose money (Newall, 2015).

20 The third aim of the Act was to protect children and other vulnerable people from gambling-related harm and exploitation.

As a fuller discussion will follow in Question 15, 16 and 17 on children and young people, this part of the response will review experiences of vulnerable adults.

Transparently, disordered gamblers are vulnerable, and their relationship with gambling is akin with substance addiction. Both remote and land-based operators use addicts to form parts of their profits.

One product highlights this situation. Electronic Gaming Machines (EGMs) form 'grind income' for some bookmakers, and the propensity by disordered gamblers (individuals who pathologically gamble) to become addicted to EGMs, suggests exploitation of vulnerable addicts is inevitably occurring (Livingstone, et al., 2017).

30 Similarly, remote operators in 2018 were accused of being 'addicted to addiction' as 'more than half' of their profits came from 'at-risk and problem gamblers' (Cowen, et al., 2018).

Other vulnerable groups include incarcerated communities, veterans and serving members of the armed forces and homeless people.

Those in prison are 'consistently' identified around the world to be 'significantly more vulnerable' to gambling-related harm than 'general populations in the same countries' (May-Chahal, et al., 2017: 65). Press reports of gambling-related harm demonstrate how frequently addiction plays a part in criminality.

40 Greater support for all addictions is needed in prisons, and the CofE's involvement in working with incarcerated communities provides much-needed support for many. All education and support, however, must be built on the same principles as outlined in our response to Question 10.

The Rt Rev. the Lord Bishop of St Albans, Dr Alan Smith, has also frequently mentioned the experiences of those who have either served or are serving in the armed forces.

With hundreds of chaplains embedded in the Armed Forces, pastoral care for the Army, Navy and Air Force, is crucial to the mission of the CofE.

Charities and independent organisations who work with these groups have also reportedly expressed concern about gambling-related harm impacting their clients.

10 The placing of EGMs, reportedly in alcohol-licensed Ministry of Defence (MoD) property, is of deep concern as vulnerable people, serving members of the armed forces, are being primed to gamble on addictive products, and mentally associating the action with respite, relaxation and socialising in a stressful environment.

The Bishop of St Albans has requested data from the MoD for the number of EGMs on MoD sites, the amount of money taken, the safeguards available to those affected and has encouraged independent research.

Elsewhere, through the network of parish churches, the CofE has worked with associated charities to provide advice for those impacted by homelessness (a group affected by gambling).

Research shows that 11.6 per cent of the homeless population experience gambling-related harm, compared with less than one per cent in the general population (Johnston, September 10, 2018).

20 We believe vulnerable people (homeless people, veterans and incarcerated populations) are not receiving adequate support and protection from and by state or industry actors.

In sum, the impact of the Act has been profound. Yet the wider acceptance of gambling in society has been matched with greater concern for those experiencing gambling-related harm.

While the Act aimed to promote a clean, fair and safe gambling industry the public's perception does not match this ambition.

The regulator's research shows 71 per cent of people think gambling is dangerous for family life and 79 per cent think there are too many opportunities for gambling (Gambling Commission, February 2019).

**Recommendation:**

30 The initial aims of the Act are not being suitably upheld. Strengthening the aims would be positive, and exploitative practices must be curtailed.

Efforts to prevent clustering of gambling opportunities, greater treatment provision for incarcerated people, and a joined-up approach by mental-health staff working with rough-sleepers to spot and mitigate gambling-related harm, would all be welcome.

Other aims can be consolidated through a clearer definition of fairness and including police and crime-experts in future discussions around gambling by policymakers. Clear data from the police and criminal justice system is needed to fully appreciate the degree to which this aim is not being upheld.

## QUESTION TWO

40 *What changes, if any, are required to bring the Act up to date with new technology and the latest knowledge about how gambling harm is distributed?*

**Answer:**

The Act must be updated to appreciate technological developments. This includes reviewing the legislation and regulation around in-play betting, use of credit cards, the equalisation of spin, speed and stake online, and evaluating the practices of the industry.

**Background:**

The Act has frequently been labelled an analogue piece of legislation in a digital age.

The legislation did not cover, and could not cover, the way technology changed gambling. For example, since the Act came into effect in 2007 there have been 21 new models of the Apple iPhone.

- 10 With the rise in smartphones, and near-universal Internet-coverage, products have changed. Yet gambling apps have the possibility of being ‘more problematic’ for vulnerable people than FOBTs, as they can be accessed anywhere ‘with an Internet connection’ (Busby, February 22, 2019).

The legislation does not adequately protect consumers from this potential harm. Product development has also changed since the Act was written and researchers have now suggested firms can increase the potential for addiction in products.

- 20 FOBTs, for example, were increasingly recognised as addictive. The ‘sensory feedback’ including ‘bells and whistles’ join the speed of spin which creates ‘a feeling of continuous play’ alongside the near-miss sensation which ‘produces cognitive distortion where players feel like they’re about to win’ are cited as reasons for their addictive potential (Wealthsimple, February 7, 2019).

Other newer products since the Act include in-play betting. This type of product has been a focus in New Zealand due to the potentially damaging impact this product has, and subsequently that jurisdiction has ‘developed strict criteria around this aspect of gambling’ (Atherton, August 2018: 16).

Greater technological understanding has also changed how choices are made by consumers. This is due to ‘nudges’ which attempt to improve “the environment in which people choose – what we call the “choice architecture –” without restricting options (Thaler, August 3, 2018).

- 30 However, gambling firms allegedly use these nudges to ‘exploit’ punters’ ‘economic rationality’ a practice dubbed ‘dark nudges’ (Newall, 2019: 65). This could include the deliberate use of near-misses or ‘losses disguised-as-wins’ on EGMs (Dixon, et al., 2010).

Technological changes have coincided with the rise in remote gambling. The current legislation, however, does not allow for the equalisation of spin, speed, and stake with land-based operators, despite the context for consumers when they are gambling online, as described above.

Ministers are unable to increase or reduce the minimum stake online because the legislation is out of date, according to the Campaign for Fairer Gambling (CFG) (Campaign for Fairer Gambling, March 4, 2019).

- 40 This environment online could explain the remote sector’s continued expansion.

While the number of employees in the betting industry is falling, the gross gambling yield (GGY) for remote operators continues to expand, and in 2018 remote accounted for 35 per cent of the industry's total GGY (Gambling Commission, May 30, 2019).

Remote operators often claim they have a better understanding of consumers' movements online and therefore can intervene to protect consumers from themselves, as opposed to in land-based shops.

10 However, exploitative practices by remote operators challenge this view. At the All-Party Parliamentary Group (APPG) on Gambling-Related Harm in 2019 a discussion focussed on the capability of firms to 'knit' online data about those who suffer from gambling-related harm with adverts for addictive products.

This has already occurred in 2017 when gambling companies were accused of using third-party companies to 'harvest people's data' in order to 'target people on low incomes and those who have stopped gambling' (Busby, August 31, 2017).

Other technological innovations which have challenged by campaigners and academics is the request-a-bet products that were heavily used during the 2018 World Cup.

These types of bets often rely on complex combinations which appear to sports fans achievable but rarely pay out (Newall, Under Review). The high-profit margin bets provide few chances for punters to win large amounts of money but appear as if they potentially could.

20 This development can constitute exploitive innovation which has been used to describe the technological changes in the gambling industry since 2005.

Other aspects of the Act have not been updated despite cross-party calls. Both the then Parliamentary Under-Secretary responsible for gambling, Mims Davies MP, and her then shadow Tom Watson MP have cited credit cards as an area of concern (Davies, December 5, 2018; Davies, September 19, 2018).

The ability for consumers to gamble on credit cards, online and offline, is a key flashpoint as it allows punters to bet with funds they may not have and prevents cooling-off periods between bets.

30 The regulator cites the ease with which people can borrow money which can 'facilitate high levels of gambling debt e.g. through maximising credit limits across multiple cards' as an issue (Gambling Commission, August 14, 2019).

For their survey, the regulator found 57 per cent of participants in their survey were either experiencing low or modern levels of harm from gambling or were classed as problem gamblers. Additionally, of those classed as problem gamblers, 40 per cent used credit cards for gambling (compared with 5.5 per cent of those not classed as problem gamblers) (Gambling Commission, August 14, 2019).

The concern for credit cards mirrors the Budd Report mentioning in 2001: 'ATMs are increasingly being installed in gambling areas... the location of ATMs should be required to be such that players have to take a break from gambling to obtain more funds' (Grant, et al, 2019: 31).

40 While some banks have reviewed their policies in recent years, it is important those who do not have adequate funds are not betting on credit and are not gambling continuously.

**Recommendation:**



The legislation requires changes to adapt to technological advancement in the industry.

New products; new ways to bet; restricted choice-architecture; asymmetric experiences of addictive products between online and bricks-and-mortar; predatory marketing practices; and the use of credit cards are all in urgent need of review.

In our view, the potential to harm by new products needs to be assessed independently when they are being developed and not retrospectively. Credit cards should be banned for use on gambling products, while remote operators should be forced to equalise spin, speed, and stake of their products to best protect customers.

## QUESTION THREE

- 10 *Is gambling well regulated, including the licensing regime for both on- and off-shore operations? How successfully do the Gambling Commission, local authorities and other enforce licensing conditions including age verification? What might be learned from comparisons with other regulators and jurisdictions?*

### **Answer:**

Gambling is currently not as well regulated as it could be, based on international comparisons, and local authorities require greater support to enforce best practice.

### **Background:**

Internationally there is not a consensus of how best to legislate for, and regulate, gambling.

- 20 Sweden relies on an Act which came into force from 2019, which is designed to challenge non-domestic remote operators, while Belgium uses three Acts, one of which comes from 1851 (McDonald, McDonald, April 10, 2019; Paepe, November 1., 2016).

Belgium and Italy take a much more stringent approach to legislation. Belgium's laws bring products, such as loot-boxes, into the scope of gambling while Italy responded to a fourfold increase in gambling-related harm in the past decade with a Dignity Decree law which bans all adverts (excluding current ad-deals and the Government-approved lotteries) (Kelly, July 5, 2018).

Domestically, the United Kingdom (excluding Northern Ireland) is legislated through the 2005 Act which created the Gambling Commission to regulate gambling in partnership with local authorities and issue licences for gambling operators.

- 30 Northern Ireland's distinction will be reviewed in a report, published in September 2019, on the regulatory and legislative harmonisation of Great Britain and Northern Ireland, following the Bishop of St Albans' amendment to the Northern Ireland Executive (Formation) Bill 2019.

The Government's approach to gambling has been to encourage self-regulation. Moving gambling out of the Home Office and into Department for Digital, Culture, Media and Sport (DDCMS) is part of this view of how best to regulate the industry.

Yet efforts to protect consumers, originating from the industry, have been controversial. For example, the Senet Group slogan, 'When the fun stops, stop.'

- 40 The warning messages have been found to do little 'or nothing' to reduce gambling and the 'fact that the word fun is printed in much larger font than any other word in the message' has been criticised (Davies, R., August 4, 2019).

Remote operators also fail to demonstrate adequate self-regulation. The development of VIP customers (some operators label them Key Account Management, or KAM), who lose heavily, is a representative example.

These clients are often messaged free-bets and other inducements, despite exhibiting markers of gambling-related harm as a premise of becoming VIP clients. This can include being showered 'with perks such as free tickets to football matches' (Ford, March 3, 2019).

The industry is accused of allowing someone to be both a VIP client and be presenting signs of gambling-related harm. Clear data on this should be made available to the regulator.

10 Bet365, Britain's biggest online betting firm, in February 2019 was said to be giving rebates to players who lost money in an alleged attempt to 'exploit vulnerable customers' (Payne, February 17, 2019).

Another person added the industry can choose to make people VIPs and 'use that to their advantage' (Davies, April 22, 2019). Examples include personalised messages stating: 'We miss you at the tables' from account managers to gamblers (Cheetham, April 16, 2019).

Additionally, Gambling With Lives has accused firms of 'luring' those who are suffering from gambling-related problems and use FOBTs to online games which have stakes 'as high as £10,000' (Ungoed-Thomas, November 18, 2018).

20 The consequence of this approach to self-regulation is increased gambling-related harm and growing mistrust by ordinary punters. Indeed, seven in ten gamblers think bookmakers are not serious about providing a responsible gambling experience (Smith, May 16, 2019).

Figures including the Rt Hon. the Lord Kinnock, have made comparisons between the approaches in regulation of tobacco and gambling (HL Deb 2018).

Tobacco has been extensively regulated since the mid-1960s, including a restriction on shop displays. It was subsequently found that the risk of 11 to 16-year-olds taking up smoking was significantly reduced (Ford, et. al., 2019).

Tackling gambling-related harm through a public-health approach (as will be discussed in the response to Question 10), must include reviewing the cross-industry evidence of public-health approaches towards tobacco.

30 Nevertheless, the gambling sector is not entirely self-regulated. The Gambling Commission has traditionally assumed a light-touch role. Recently, tougher sanctions and more robust rhetoric has started to become the norm. However, the relationship with the industry and the alleged reluctance to use the full extent of their powers remain an area of concern.

Conversely, local authorities have traditionally taken a tougher line on gambling yet require more powers to regulate in the way they see fit.

Local councils and authorities are restricted. The Local Government Association wrote in 2016 they required greater powers to prevent clustering of betting shops with four FOBTs in each (Local Government Association, November 2018).

40 In July 2018 they cited the Act as a principle cause of the clustering, claiming: 'The Gambling Act includes a statutory aim to permit licensing which has made it difficult to refuse new licences applications' (Local Government Association, November 2018: 19).

Another problem facing local authorities is asymmetric information. It is often assumed bookmakers provide jobs, and social spaces, akin to a well-run restaurant. Yet, studies

demonstrate the hyper-masculine, problematic spaces that bookmakers tend to be, and other studies demonstrate the negative economic impact they have on communities (Cassidy, 2013).

Betting shops cluster in areas of higher deprivation (Morgan, Mudie, September 16, 2017). Westminster City Council also mapped the location of gambling-licensed spaces in relation to 'food banks,' 'job centres,' and 'treatment centres' for addictive substances, demonstrating a correlation (City of Westminster, March 8, 2016).

10 The targeting of poorer residents then has an economic impact. For example, Respublica has suggested clustering of EGMs triggers 'a negative multiplier effect on our high streets' and had hastened 'the decline of high streets' and has 'profound economic and social consequences for communities' (Douglas, et al., October 2017: 15).

Clearly, local authorities have been unable to properly regulate the gambling industry and the macro-regulation has similarly faced challenges due to the laissez-faire approach to regulation.

Finally, any efforts to verify ages are demonstrably not watertight. The scale of children experiencing gambling-related harm shows this. The regulator's power to revoke licences for operators should be employed when companies are found to allow children to gamble.

**Recommendation:**

The Commission, local authorities and the Government all have a responsibility to strengthen regulation for licence holders. The experience of too many vulnerable people suggest how lax our approach has previously been.

20 The Government should consider more stringent international models of regulation. A review on banning VIP clients, or similar, giving local authorities more power to prevent clustering and a robust, regulator-created age verification system is necessary to guarantee all operators have the same standards of protection.

## QUESTION FOUR

*Should gambling operators have a legal duty of care to their customers?*

**Answer:**

In our opinion, yes, it is clear gambling operators must have a legal duty of care to their customers.

**Background:**

30 MPAC is rooted in Christian values which emphasise mutual responsibility in society. We are each responsible for one another and have a duty of care, spiritually, to our neighbours.

In the biblical books of Matthew, Mark and Luke, Jesus is said to summarise the entire 613 laws of the Hebrew Bible in to two. The latter being: 'Thou shalt love thy neighbour as thyself.'

Similarly, tort law states there must be a 'neighbourhood' principle for there to be a legal duty of care to exist.

Currently, punters only have recourse under contract law but would benefit from a legal duty of care being created legislatively in order to allow recourse under tort law.

40 The experiences of many people in Great Britain would suggest that gambling firms do not have customer best interests at heart, and certainly not a duty of care embedded in their practices.

**Recommendation:**

Allegedly typical, predatory behaviour described in the response to Question Three from some operators reflects why a legal duty of care would be welcomed by consumers and victims of gambling-related harm.

This would require legal discussions and political action, but it would greatly improve the power of punters.

## QUESTION FIVE

10 *What are the social and economic costs of gambling? These might include costs associated with poor health and hospital inpatient services; welfare and employment costs; the cost of benefit claims; lost tax receipts; housing costs through statutory homelessness applications; and criminal justice costs.*

**Answer:**

The costs, both social and economic, of gambling are significant because they impact every aspect of communities.

**Background:**

Gambling costs should never be understood by only referencing individual harm. The industry's interest aligns with the view of individual focus as it shifts 'attention away from the products' and corporate behaviour (Wardle, et al., 2019).

20 A society-wide approach is more accurate. In 2017, the Chief Medical Officer for Wales wrote: 'Harm from gambling is found at individual, social (family and friends) and community levels.

'This includes financial hardship, psychological distress and interpersonal conflict or relationship breakdown' (Atherton, August 2018: 12).

The industry regulator added in 2018 that the "individual" is embedded within the "social" which means action for reducing harm must include aspects which 'mitigate risks at the societal, community and inter-personal level' (Wardle, et al., 2018).

30 Great Britain's large numbers of gamblers presenting issues of gambling-related harm are of note. The Gambling Commission wrote in 2019 that 0.7 per cent of respondents to their research were 'problem gamblers' and 46 per cent of respondents 'have participated in any form of gambling' in the past month (Gambling Commission, February 2019).

It is further estimated that there are around 430,000 people classed as 'problem gamblers' (House of Lords, November 1 2018).

With these large numbers of people experiencing gambling-related harm, the Institute for Public Policy Research (IPPR) in 2016 estimated the cost to the public is between £260 million and £1.16 billion (Thorley, et al., December 2016).

The wide range in the figures suggest they should be used as 'an illustrative estimate of the excess costs incurred' (Atherton, August 2018: 12).

The CofE runs more than 33,000 social action projects, from food banks to debt counselling, and witnesses the impact of all social harms, including gambling-related harm.

In 2006, the EIAG of the CofE mentioned concerns from clergy about the impact of gambling-related harm.

A member of the clergy was said to have calculated ‘thousands of pounds leave his parish in a deprived estate every week through the National Lottery and other forms of gambling’ (Church of England, 2006: 22).

The interplay between poverty and gambling-related harm has long been of concern. As the Chief Medical Officer in Wales wrote: ‘Gambling problems and harms impact the poorest in our society the most’ (Atherton, August 2018: 14).

Synod delegates in 2019 also spoke of poverty’s intersection with gambling-related harm.

- 10 One delegate said his father had lived in a ‘hut without main sewerage on top of a hill’ with four siblings because his grandfather had gambled away the family’s finances. He added: ‘They survived by eating stale bread’ (Church of England, 2019: 708).

The social and economic impact of the experiences detailed above can never be fully calculated but has a lasting effect on communities. What the EIAG of the CofE called ‘regressive taxation’ has been explored domestically and internationally (Church of England, 2006: 14).

The clustering of EGMs in deprived areas occurs globally. Australian academics have identified the practice and demonstrated money rarely returns to the communities using the machines.

They conclude:

- 20 ‘Gambling has enabled the dramatic redistribution of resources, transferring, with industrial efficiency, billions of dollars from the pay packets of the working classes to the bank accounts of the richest 0.01 per cent’ (Markham, et al., 2015: 2).

Similar experiences in Great Britain have been remarked upon by city councils.

When the Budd Report was published in 2001, the Rt Hon. the Lord Hattersley responded. His comments now appear to be prescient.

He wrote: ‘Respect of the individual requires us to allow men and women to make their own mistakes. But, in a civilized society, there is no freedom to exploit others and no liberty to destroy families’ (Orford, 2011: 55).

It is not just the economically deprived that face costs associated with gambling-related harm.

- 30 It is in the interests of taxpayers to see a full assessment of the costs to public services, whether the police, the criminal justice system, health care providers (please see Question 11), coroners (please see Question 12), arguably favourable tax policies (see below) and much else besides.

Debates on the social and economic costs of gambling-related harm inevitably leads to comments on the ‘polluter pays’ policy which underpins funding discussions in the Act (House of Commons, 2012).

The tax-regimes governing gambling are arguably favourable, including exemptions from Value Added Tax (VAT) and no mandatory obligation to give one per cent of GGY to a levy (see Question Seven) (House of Lords, July 3, 2019).

Additionally, the industry has become less welcoming to independent players. As Dr James Noyes wrote: 'Industry omnipresence has been coupled with a constriction of market competition to a small group of big brands' (Noyes, October 18, 2018).

The regulator suggests 69.6 per cent of the total remote sector in 2017 was held by just five companies (namely Bet365, PaddyPower Betfair, SkyBet, Ladbrokes-Coral and William Hill).

Research concurs, suggesting exploitive innovation has led consumer-friendly firms being unable to gain a 'profitable foothold' (Newall, 2019).

**Recommendation:**

10 It would be welcome to see a fully engaged gambling sector which recognises and contributes funds towards the social and economic costs of gambling-related harm and mitigates the spread of such harms by adapting its policies and practices.

As will be discussed, a mandatory levy is necessary to mitigate the scale of costs to society, but a proactive effort to prevent gambling-related harm is also required from the Government.

## QUESTION SIX

*What are the social and economic benefits of gambling? How can they be measured and assessed?*

**Answer:**

20 In our view there are no academically robust studies which demonstrate the social benefits of gambling, and the economic benefits which include taxation are hotly contested.

**Background:**

The Church inadvertently benefits from the gambling sector. While the EIAG of the CofE prevents the Church Commissioners from investing in any form of gambling, individual parishes receive funding from the National Lottery.

As the Bishop of St Albans told the General Synod in 2019:

'The CofE is the nation's custodian for 45% of the country's Grade I listed buildings, and therefore there is a nationwide benefit to Government sharing the responsibility for their maintenance and encouraging a wide sense of ownership amongst the community.

30 'Of course, our parishioners pull their weight, financially raising £126 million in 2017 for repairs and maintenance, added to some extent by charitable trusts, yet with the ongoing and significant upkeep requirements there seems little choice but to use all the funding streams available.

'The 2018 Taylor Review into the sustainability of church buildings underscores this, speaking of significant external funding for churches in the years up to 2016, recognising that since the establishment of the National Lottery in 1994 it has increasingly become the only source of major funding for church and cathedral building projects.

‘With historic churches and cathedrals facing the ongoing challenge to maintain their buildings whilst ensuring comfort, safety and accessibility for all, many places, including St Albans Abbey, have received money from National Lottery Heritage Funding.

‘I would much prefer that the Church and society should look to a funding model for a sustainable, accessible future for church buildings which does not raise these questions, for example the proposals which were explored in the self-same 2018 Taylor Review’ (Church of England, 2019: 688).

10 The economic benefits of gambling can arguably include taxation, despite the estimated social and economic costs of gambling-related harm ‘considerably outweigh’ the tax revenue benefits from the industry (Wardle, et al., 2019). Additionally, it has been suggested the initial spend on gambling could have been spent on other, equally taxed, products.

There are currently seven types of betting and gaming duty (General Betting Duty; Pool Betting Duty; Bingo Duty; Gaming Duty; Remote Gaming Duty; Machine Games Duty; Lottery Duty).

Since 1 December 2014, remote operators with British customers pay British taxes irrespective of where they are based. This was a shift from a place-of-supply to a place-of-consumption principle.

20 Other economic benefits have been suggested including shops, but as discussed in the response to Question One, there are doubts about the value of these jobs particularly single-staffed.

Additionally, as discussed in our response to Question Three, betting shops are said to have a negative financial impact on the surrounding areas.

Industry actors frequently mention the economic benefits offered by gambling. The controversial KPMG report ahead of the FOBT stake reduction was regularly raised by these firms.

The lobbying on this issue has previously been identified by the current Secretary of State for the Department for Digital, Culture, Media and Sport (DDCMS).

The Rt Hon Nicky Morgan MP wrote in 2018 about the ‘lobbying from vested interests’ which influenced decisions made in Government (Morgan, N., November 5, 2018).

30 It is expected that industries will attempt to influence policy makers. This means, however, claims about economic and social benefits from gambling must be considered holistically.

**Recommendation:**

The CFG was correct when it wrote any boon from the Act, and greater remote gambling accessibility, was a boon for the operators and their partners, not consumers (Campaign for Fairer Gambling, January 22, 2019).

Any discussion around benefits from the gambling industry must be alive to the significant costs associated with the sector.

## QUESTION SEVEN

40 *Is the money raised by the levy adequate to meet the current needs for research, education and treatment? How effective is the voluntary levy? Would a mandatory levy or other alternative arrangements be more productive and effective? How should income raised by a*

*levy be spent, and how should the outcome be monitored? What might be learned from international comparisons?*

**Answer:**

In our view, the money raised by the levy is not adequate to meet current needs for research, education and treatment (RET). The levy would be more productive and effective if it was mandatory, with the income spent and monitored independent of the industry.

**Background:**

The General Synod of the CofE passed a motion calling for the levy to be made mandatory in 2019.

- 10 This would satisfy demands for a polluter-pays policy to exist when funding RET. The voluntary levy raises £10 million a year, which does not adequately fund what is needed.

At the House of Lords Social and Economic Impact of the Gambling Industry Committee, Dr Anna Van Der Gaag, Chair of the Advisory Board for Safer Gambling (ABSG) said the cost of treatment stood at £591 per person per year.

She added: 'If you were to take the population that we know about from research have a problem with gambling in this country—that is 340,000—you would arrive at a figure of just over £200 million per year needed for that extrapolated population' (House of Lords, July 23, 2019).

- 20 A mandatory levy would also provide certainty to charities and others about funding streams as well as neutering accusations that academic research could be influenced by a desire to maintain funding from the industry.

This has been trialled successfully in New Zealand and would be welcomed in Great Britain.

Currently, the Government is not using the powers given to it under Section 123 of the Act, which allows for Ministers to make the levy mandatory.

While the chief executive of the Remote Gambling Association (RGA) has asked for a mandatory levy to ensure all firms are contributing, the Government has resisted (Ungoed-Thomas, October 7, 2018).

The RGA's comments came before it was revealed that prominent actors, including sponsors of Premier League gave small donations to gambling charities.

- 30 As Lord Griffiths of Burry Port told the House of Lords: 'SportPesa, which sponsors Everton, and Fun88, which sponsors Newcastle, gave £50 last year.

'Both are white labels of TGP Europe. Best Bets gave £5: I have just paid more than that for a taxi to get here.

'GFM Holdings Ltd gave a pound. What on earth would you get for £1 anywhere these days, even on the high street?' (House of Lords, July 2, 2019).

Similarly, the chief executive of NHS England, Simon Steven, has also expressed frustration.

He has said: 'This is an industry that splashes £1.5 billion on marketing and advertising campaigns... but it has been spending just a fraction of that helping customers and their families deal with the direct consequences of addiction.'



'The sums just don't add up and that is why, as well as voluntary action, it makes sense to hold open the possibility of a mandatory levy if experience shows that's what's needed.

'A levy to fund evidence-based NHS treatment, research and education can substantially increase the money available, so that taxpayers and the NHS are not left to pick up a huge tab.'

10 Gambling firms have now pledged to give more money, in a voluntary capacity, to fund projects approved by an industry-run group. Cross industry experiences of industry funded treatment and research has demonstrated this would be an unhelpful approach to delivering on a polluter pays basis.

Concerns about conflicts of interests in commercially funded research are felt in other industries, include work supported by the Coca-Cola Company. For example, the drinks company allegedly 'prevent publication of unfavourable research' (Steele, et al, 2019).

Academics refer to the 'moral jeopardy' of taking funding from gambling companies, whether for research or for community and other public good organisations (COPGOs). Moral questions are raised as these groups, established to support people, could inadvertently benefit from people's pain.

20 Questioning these complications could cause issues for management in either research bodies or COPGOs as other areas of the organisation may be receiving funds from gambling firms. Similarly, COPGOs could 'become major advocates for the provision of gambling' (Adams, 2006).

Conversely, gambling firms derive public support from these donations, allowing them to 'interface more easily in community, local authority, and public arenas' for favourable regulatory benefit (Adams, 2006).

Similar concerns about industry funded treatment exist and are discussed in the response to Question 11.

**Recommendation:**

30 A mandatory levy is the settled position of the CofE's General Synod, most academics across the world, and experts-by-experience. It is the basis of any future gambling reform and any industry-controlled distribution of voluntarily agreed levels of funds is entirely inappropriate and does not address the central issues as discussed throughout this document.

## QUESTION EIGHT

*How might we improve the quality and timeliness of research in the UK? What changes, if any, should be made to the current arrangements for funding, commissioning and evaluating research in the UK? What might be learned from international comparisons?*

**Answer:**

Research is always useful to make informed and sound decisions when it comes to gambling and young people, but enough information is already available to put in place greater safeguards.

40 **Background:**

The data-gap has long been a concern for researchers and policymakers, although funding could be a factor in this.

Nevertheless, it is important policymakers recognise a significant quantity of research has been conducted and there is enough evidence to inform regulatory decisions.

Unhealthy commodity industries (UCIs) often use various methods to undermine attempts to take public health approaches towards regulation (Petticrew, et al., 2017).

This can include suggesting any action can only take place when everything is known, as opposed to the expected position which would allow for policy changes to be made based on specific key data coming to light.

10 **Recommendation:**

Arguably, enough is known to make changes to better protect children and young people from gambling-related harm without waiting for more data and research to be gathered. A further discussion on what should be done can be found in the response to Question 15.

## QUESTION 10

*Is enough being done to provide effective public education about gambling? If not, what more should be done?*

**Answer:**

There is currently not enough education about gambling in schools, universities and wider society and more must be done that is independent of the industry.

20 **Background:**

The CofE is the second-largest provider of education, behind only the state. With this network of 4700 schools, and approximately a million pupils, the Church can provide a unique account on education programmes.

When discussed in schools, gambling forms part of Personal, Social, Health, Economic (PSHE) Education. This would be part of the school curriculum in the CofE's 200 secondary schools.

Schools are expected, as the Government confirmed in 2018, to promote 'the spiritual, moral, social and cultural development of pupils' and 'some teach about gambling' (House of Lords, December 19, 2018).

30 Under the 2019 Relationship, Sex and Health Education guidelines students discuss gambling in conversations around internet safety and harms. The Government wrote: 'Pupils should know... the risks related to online gambling including the accumulation of debt' (Department for Education, February 2019).

Currently, there is no formal, independent advice about what, and how, schools should be teaching children to comply with this new regulation.

There has been concern from academics and campaigners about education programmes on offer, which are funded by the gambling industry.

40 Some of these programmes may focus on spotting signs of gambling-related harm. Yet may not include discussions on why people gamble, may not reiterate gambling is harmful in-and-of-itself (see Question 12), may not remind pupils it is illegal for children to gamble (with some exceptions, see Question 16 and 17), and may not state it is wrong for children to

gamble. The absence of these discussions could encourage children to gamble, thinking it was normal and a usual part of life.

Education goes beyond school however, which is why academics have encouraged a public health approach to gambling-related harm. The call for this type of initiative was made clearly in the British Medical Journal (BMJ) in 2019.

Due to the overlaps between gambling-related harm and other local public health issues, local authorities have also begun discussing a public health approach to dealing with issues (Local Government Association, November 2018).

10 Early reports from Leeds, following the soft-opening of the NHS Northern Gambling Clinic, suggests council workers are being trained to recognise gambling-related harm in residents, who may have approached the local authority on not overtly gambling related matters.

The role of public health approaches includes continuous education.

The General Synod motion in 2019 recognised the importance of churches becoming safe spaces for those impacted by gambling and the education of parishioners on this topic.

There is a clear desire for greater information from adults on gambling and gambling-like products. Research has demonstrated parents are keen to know more about loot-boxes, for example, demonstrating the low level of understanding among the general public (Populus, February 2019).

**Recommendation:**

20 The Government has directed schools to discuss gambling-related harm with students. However, a programme of education must be drafted entirely distinct from the industry or any organisation that receive funding from the industry.

More widely a public health approach should be adopted by the Government, which would then lead to wider education and prevention programmes.

## QUESTION 11

*Are the services available for the treatment and support of people at risk of being harmed by gambling sufficient and effective? How might they be improved? What steps might be taken to improve the uptake of treatment, particularly among groups who are most likely to experience harm from gambling and least likely to seek help?*

30 **Answer:**

The services available for treatment and support for those affected by gambling-related harm are not currently sufficient.

This can be improved through adopting a public health approach (as discussed in the response to Question 10) and acquiring a reliable funding stream (as discussed in the response to Question Seven).

**Background:**

As Christians, caring for the sick is a core part of witness. Biblical authors describe the requirement to care for relatives (1 Timothy 5: 8), heal the sick (Matthew 10: 8), and Jesus states those who will 'inherit the Kingdom' include those who visit the sick (Matthew 25: 36).

It is therefore incumbent on Christians to alleviate the suffering of those who are afflicted by medical problems.

Consequently, the Bishop of St Albans welcomed the inclusion of gambling in the NHS Long-Term Plan (LTP), so that those facing gambling-related harm received greater support.

Bill Moyes, the chair of the Gambling Commission, has claimed the NHS lacks knowledge of gambling-related harm, and it must 'take it seriously' (Thomas, May 20, 2019).

His call came as record numbers of gamblers were hospitalised by the NHS. Data suggested 'more than 100 people were admitted' because of gambling-related harm 'so severe they needed hospital treatment' (Hymas, October 20, 2018).

- 10 In the summer of 2019 it was revealed 335 people were treated for 'gambling-related problems at English NHS hospitals last year, up 27 per cent... some aged 10 to 19' (Small, August 17, 2019).

Similarly, the National Gambling Helpline took 29,889 calls in 2017-2018, which constitutes a rise of 30 per cent (BBC News, November 15, 2018).

Arguably, this increase in presenting medical problems stems from the fact gambling-related harm is serious and must be correctly addressed by policymakers.

Yet in 2018, the CEO of GambleAware wrote: 'Despite gambling addiction being recognised by the World Health Organization as a behavioural disorder, the NHS does not currently fund specialist treatment' (Etches, November 22, 2018).

- 20 With the NHS LTP this appears to be changing, but the Bishop of St Albans has regularly raised the need to see data, funding details and projected costs from the relevant sections of the NHS and the Department for Health and Social Care.

It has, however, become known that the National Problem Gambling Clinic in London will include a children and young people service, and the clinic in Leeds (as discussed in Question 10) is set to open in 2019 with satellites opening in Sunderland and Manchester.

The development of youth services (with the opening of the under-18s clinic in London) followed a 2018 admission from a Government Minister that children were expected to use services designed for adults (House of Lords, November 23, 2018).

- 30 The funding from GambleAware for these two projects and the details from Leeds have been shared with the Bishop of St Albans using Parliamentary Written Questions and Answers.

Industry funding of treatment however is of concern and could constitute 'moral jeopardy' (as discussed in the response to Question Seven). Funding would benefit being independent, and consistent, through a mandatory levy that was then independently divided among beneficiaries.

The NHS must be needs-driven and therefore a rigorous, and regular, prevalence study conducted in all regions of the country is needed to best target future treatment centres.

**Recommendation:**

- 40 Any improvement in the quantity of treatment available to people, provided by the NHS and funded and managed at arms-length from the industry, is therefore to be welcomed and would have an incredibly positive impact on society.

## QUESTION 12

*What steps should be taken better to understand any link between suicide and gambling?*

### **Answer:**

Suicide is a tragedy therefore there must be a greater understanding of any link between suicide and gambling.

### **Background:**

Gambling is, according to medical professionals, dangerous to human health.

10 The director of the London clinic (referenced in the response to Question 11), Dr Henrietta Bowden-Jones wrote: 'Gambling disorder is still in its infancy here in the UK in terms of high-quality research.'

Adding: 'We would... be able to attribute 550 deaths a year to gambling driven suicide... the message from... research is clear: Gambling can kill you' (Bowden-Jones, H., March 13, 2019).

Similarly, Lord Chadlington has written that: 'Some experts estimate that two suicides every working day can be attributed, at least in part, to' gambling-related harm (Chadlington, L., July 19, 2018).

The discussion around suicide and gambling have been put into a clearer context by the work of Gambling With Lives. This charity has worked to bring to the attention of policymakers, and the general public, the link between gambling and suicide.

20 International research has established suicide rates are greatly elevated among individuals experiencing gambling-related harm. Indeed, these people are 15 times more likely to take their own lives than the general public (Karlsson, A., et al., 2018).

Within domestic research, it has been demonstrated that those experiencing gambling-related harm are significantly more likely to attempt suicide. This work from 2019 found these individuals are three times more likely to consider or attempt suicide than the general public (Gambling Commission, July 19, 2019).

### **Recommendation:**

It would be welcome to have better understandings of the link between suicide and gambling, but this must be followed by policymakers taking robust and rapid action based on any research to prevent further tragedies.

30 Practical steps can be taken, including mandating all coroners to make note of gambling as a factor in any suicides. Additionally, including gambling in any morbidity studies is necessary.

## QUESTION 13

*The RGSB has said that by not taking action to limit the exposure of young people to gambling advertising "we are in danger of inadvertently conducting an uncontrolled social experiment on today's youth, the outcome of which is uncertain but could be significant." Do you agree? How should we make decisions about the regulation of gambling advertising? What might be learned from international comparisons?*

### **Answer:**

Yes, the rise in commercial gambling advertisements since the passing of the Act could have potentially harmful impacts on children and vulnerable people.

Advertising regulation must be made stricter to better uphold the core aims of the Act (as described in the response to Question One), and international examples demonstrate robust regulation is possible.

**Background:**

Researchers have been unable to conclusively provide evidence which suggests exposure to adverts makes people more likely to buy the advertised products.

10 Nevertheless, the gambling industry has consistently spent large amounts of money on advertising products since the Act came into force in 2007.

GambleAware estimated the spend, excluding online advertising, has: 'Steadily increased year on year from £264,657,325 in 2015 to £328,945,916 in 2018. This represents a 24% increase from 2015 to 2018' (Ipsos MORI, July 9, 2019).

Due to the direction of the industry towards a more remote focus (as described in the response to Question Two), advertising online represents a significant investment. Estimates put the total spend, including online, to be around £1.5 billion annually (Davies, November 24, 2018).

20 It is reasonable to assume if there was no evidence suggesting adverts have an impact on consumption of UCIs, the gambling industry would not be spending an estimated 1/14<sup>th</sup> of their total GGY on adverts.

While data is held confidentially by the gambling industry and its advertising and marketing agencies, researchers will be unable to properly assess causality.

It is vital this data, including 'behavioural player data, advertising strategy documents, marketing briefs, campaign evaluation data and case studies' is shared with independent academics (Newall, et al., 2019).

International researchers suggest children's attitudes towards gambling can be influenced by adverts (Deakin University, February 20, 2017). Additionally, children's recall of gambling adverts has revealed the extent to which young people are exposed to gambling adverts.

30 Most children surveyed in one study, aged between 8-16 years were able to recall the names of sports betting brands, and male children aged 12-16 years who play football or attend matches were more likely to recall brand names than younger children, girls or those who played other sports (Thomas, et al., 2016).

Similarly, gambling adverts could have an impact on vulnerable adults. Although advertising guidance bans undue pressuring of people to gamble, live-odds TV adverts flourished before the voluntary advert curtailment.

Both children and adults are susceptible to certain adverts, especially inducement bets. These often encourage registering with a remote operator and getting a varied amount of money 'free' or in 'credit' form.

40 This rise in gambling advert exposure represents a significant shift in the British cultural understanding of the place of gambling adverts.

Indeed, when Budd wrote his 2001 report:

‘It was still illegal for press advertising for casinos to make mention of gambling or to provide details of the venue’s location (such as a postal address); and for many forms of gambling, advertising on broadcast media was subject to significant limitations.

‘The advertising of betting and gaming on television was prohibited for all activities... [excluding] football pools, bingo and lotteries (under the Lotteries and Amusements Act 1976)’ (Grant, T., et al., 2019: 26).

The response to the advert explosion has been negative. The public, when polled, are opposed to the rate, pervasiveness and ubiquity of gambling advertising.

10 The regulator stated in 2018 that there was: ‘Significant public concerns about the volume, nature and scheduling of gambling advertising and the impact this could have on future generations’ (Gambling Commission, April 24, 2019: 6).

Indeed, as mentioned in the response to Question Three, comparisons with tobacco in the latter half of the 20<sup>th</sup> century have been widely made by policymakers.

As part of this backlash, the CofE General Synod in February 2019 discussed gambling advertising. The discussion was tinged with a concern reflective of the regulator’s concern.

One delegate said: ‘Do not be deceived. The adverts the 13-year-old next to you will see will be tugging at their most sensitive heartstrings, using every known way to get at them... Make no mistake, the gambling industry know what they are doing. They are there to hook them’ (Church of England, February 2019: 702).

20 Gambling companies have recognised this public perception and offered statements which reflect this acknowledgment.

William Hill’s finance director, Philip Bowcock, said he was ‘sympathetic to some sort of curb’ on advertising because of his ‘teenage children’ (Davies, February 24, 2017).

Subsequently, the whistle-to-whistle voluntary agreement which stops gambling adverts during live TV sport (including five minutes before, five minutes after on the understanding it is before 9pm) came into force with the 2019 Ashes cricket series (Davies, August 1, 2019).

In public meetings of the APPG on Gambling-Related Harm, representatives from industry trade bodies stated there would be a net-reduction of adverts due to the agreement.

30 The advertising regulator, the Advertising Standards Authority (ASA), has recently updated guidance around gambling adverts to better protect children and young people.

The advertising landscape currently, which was called ‘out of control’ by the Bishop of St Albans, continues to change and adapt but moves towards self-regulation requires further scrutiny (Smith, September 12, 2018).

**Recommendation:**

It would be welcome to assess the impact of the Italian Dignity Decree (as discussed in the response to Question Three) in reducing gambling-related harm, but enough evidence exists to suggest regulating gambling advertising more robustly, including banning inducement bets and in-play adverts online, would better protect children and vulnerable people.

40 A total ban on adverts, especially those linked with sports, must also be considered by the Government.

## QUESTION 14

*Gambling is becoming an integral part of a growing number of sports, with increasingly close relationships between operators and sports clubs, leagues and broadcasters. What are the risks attached to this?*

### **Answer:**

Gambling is undoubtedly becoming an integral part of a growing number of sports, particularly football, and it is understood there are significant risks attached to this, especially around children and young people's perception of gambling.

### **Background:**

10 Gambling advertising has expanded rapidly since 2007, and the impact has been most keenly felt in the world of sports.

Sport is highly valued by the CofE. In summer 2019, £12 million of Strategic Development Funding was allocated by the Renewal and Reform programme to support 'sports ministry' which includes funding football, netball and fitness groups (Church of England, August 4, 2019).

Nevertheless, serious concerns about the so-called gamblification of sport exists. No fewer than ten Premier League clubs 'will have bookmakers or gambling firms as their main kit sponsors,' in the latest season (Kay, July 18, 2019). Shirt sponsorship has been estimated at a record £349.1 million, with gambling accounting for £68.6 million (Ling, July 26, 2019).

20 Shirt sponsorship is 'highly prized' by foreign gambling operators, as the Premier League continues to be popular across the world (Wood, September 9, 2018).

However, the practice of shirt sponsorship has been controversial. The Bishop of St Albans said in 2019: 'I know families that will not let their children watch football matches on television because they feel their children are being groomed into gambling.

'My personal view is that the FA and others need to wake up very quickly to how damaging this is going to be' (Burgess, February 2, 2019).

In August 2019, the Bishop of St Albans added his voice to nine academics from across the world who criticised a shirt sponsorship deal struck between Wayne Rooney and Derby County (Morgan, August 8, 2019).

30 Other aspects of football advertising, including pitch-side adverts, demonstrate that the whistle-to-whistle ban is unlikely to successfully limit exposure to gambling adverts.

Research demonstrates viewers are exposed to more gambling adverts on the BBC's Match of the Day than watching a live TV broadcast on Sky (Cassidy, et al., August 10, 2017).

The result of the industry's involvement in sports was highlighted by a study by Dr Darragh McGee who suggested football supporters in both Great Britain and Northern Ireland have become used to gambling being a central aspect of enjoying sport.

This includes losing the ability to watch, or discuss, football unless they place multiple bets and focus on gambling while commonly owning 'up to 25 accounts with online gambling companies' (Conn, January 10, 2019).

40 Sports players, as well as fans, are reportedly being targeted by gambling firms, including offers of 'free' credit to players who are turning to gambling online. The head of the Professional



Footballer Association declared: 'The biggest [mental health] issue at the moment is gambling' (Lovett, August 1, 2019).

Additionally, familiarity with betting logos and gambling concepts has become common among children and young people who enjoy sports.

In one study, 46 per cent of young people surveyed were able, unprompted, to name at least one gambling brand, football fans had 'significantly higher recall of brands,' and two-thirds of young people could correctly place one or more shirt sponsor next to the corresponding football team (Djohari, et al., 2019).

10 As with discussions around public support for gambling adverts in the response to Question 13, an increasingly critical tone has been introduced in discussions around gambling and sports.

Political observers have stated football is 'addicted to gambling,' and the adverts on sports serve to 'normalise betting on sport in impressionable young minds' (Freedland, February 13, 2019; The Times, December 7, 2018).

The entanglement between sports and gambling 'might be hard to separate' but similar accusations were made with the banning of tobacco adverts, which has not hampered the Premier League and its clubs from increasing their net worth (Business Matters, June 18, 2019).

**Recommendation:**

20 Gambling and sport have become increasingly close and a moratorium on this involvement would be welcomed.

A ban from the regulator for any operator to sponsor any kit, pitch-side adverts, adverts five minutes before, after and during matches is a necessity. This would facilitate research to assess the extent to which the current environment has had negative impacts, without waiting for much greater levels of harms to present themselves.

## QUESTION 15

*How are new forms of technology, including social media, affecting children's experiences of gambling? How are these experiences affecting gambling behaviour now, and how might they affect behaviour in the future?*

**Answer:**

30 Children's experiences of gambling in Great Britain have fundamentally changed since the passing of the Act.

Access to gambling products, exposure to gambling adverts and the rate of children gambling illegally especially those experiencing gambling-related harm is of great concern to senior Church figures, General Synod and other religious stakeholders.

**Background:**

The law is very clear: children should not be gambling (with the exceptions referenced in Question 16 and 17). This is because children are disproportionately more likely to experience gambling-related harm.

40 Church leaders have described the 'dubious morality' involved in encouraging children to gamble and Synod delegates in February 2019 shared this concern (Hymas, October 28, 2018).

The CofE views children and young people as full members of the Church and equal participants in society. Biblical writers say Jesus said: 'Suffer little children to come unto me and forbid them not: for of such is the kingdom of God' (Luke 18: 16).

Yet, it also sees children as inherently vulnerable to harms and deserve greater protection.

Alarm in the Church has been shared by the incoming chair of the trade body the Betting and Gaming Council, which combines the Association of British Bookmakers and the RGA.

In a 2004 appearance in Parliament, in a previous role, she said she was 'horrified' when she used websites aimed at children and was 'offered that opportunity to gamble' (House of Commons, House of Lords, January 13, 2004).

- 10 The Financial Times has declared the gambling industry is 'dicing with young lives' and the product should be seen akin to tobacco (The Financial Times, November 25, 2018).

The strong reaction is in response to the rise in gambling-related harm among children and young people. Rates of problem gamblers among children was 0.8 percentage points higher than in 2016, at risk gamblers was also higher, and currently problem gamblers among children stands at around 55,000 (Gambling Commission, November 2018).

The regulator claims past week gambling participation among 11-16-year olds rose to 14 per cent in 2018, a two per cent rise from the year before, and estimated '1.7 per cent' of the age group are 'problem gamblers' (Gambling Commission, November 2018).

- 20 The higher rates of gambling-related harm among under-18s, compared with adults, demonstrate that children are more likely than the adult population to experience harm.

Branded a 'generational scandal' the report showed more children had gambled than drank alcohol, smoked or taken illegal drugs (Gammie, November 21, 2018).

The clinics focussing on children, as discussed in the response to Question 11, demonstrate the scale of the crises as the NHS is a needs-driven service.

While it is true, remote gambling increases the availability of products to under-18s, land-based operators also have some responsibility for this situation. Public spaces are failing in their duty to prevent children gambling, with only 10 per cent of pubs stopping children gambling (BBC News, November 15, 2018).

Dr Henrietta Bowden-Jones wrote about how gambling-related harm can present in children:

- 30 'From my experience working with young people who experience significant compulsive behaviours, their inability to manage the amount of time they spend online... is often closely linked to emotional states that may feel overwhelming.

'These are normally negative ones such as low mood, anger, feelings of abandonment and fear of social exclusion. At times, these behaviours worsen as the young person disengages from previously rewarding activities and relationships in the real world.

'...The more isolated the person becomes, the more likely they are to turn towards online activities to supplement the loss of interaction...

- 40 'This problematic use is often an attempt to navigate the difficulties of growing up in contemporary society. Driving users to understand the need for screen-free time, for exercise and for real life interactions is part of a stimulus control approach to shaping behaviour that will benefit everyone, whatever their age' (Kidron, June 2018).

Researchers have also raised concerns that, because children perceive gambling differently to that of policymakers, the rate of youth gambling could be underestimated (Wardle, 2019).

The concern for young people gambling after the passing of the 2005 Act has been summarised by academics. They wrote: 'You might argue that we have created the conditions for a vast generational experiment, the outcome of which is uncertain but could easily lay foundations for future problems' (Wardle, June 27, 2018).

10 Laying the foundations for the future has been demonstrated by British researchers who found early age onset gamblers (those 12 years and younger) report increased gambling-related harm severity. Additionally, the same group were more likely to have committed an unreported crime and abused drugs or solvents (Sharman, et al., 2019).

Protections from gambling-related harm can include better protection from gambling adverts (for a wider discussion on adverts see the response to Question 14 and 15).

Children are exposed to 3.8 gambling adverts a day on television, despite the Act explicitly forbidding the targeting of under-18s (Populus, January 2018).

In 2012 Ofcom estimated children, on average, were exposed to 230 gambling adverts a year (Ofcom, November 19, 2013). While some of these may be incidentally seen, there is evidence of explicit targeting.

The ASA has used child 'avatars' (simulated profiles that replicated child activity online) to monitor online gambling advertisements.

20 In an April 2019 study, the regulator found five gambling firms over a two-week monitoring period, broke the rules around child exposure to gambling adverts (Sweeney, April 4, 2019).

Bricks-and-mortar advert campaigns include William Hill's 'Get your 5 a day here: 5 extra place races every day' poster shown in high street shop windows. The phrase, mimicking a healthy eating campaign which encourages children to eat fruit and vegetables, was highlighted online.

William Hill have previously been revealed, alongside PaddyPower Betfair, as having adverts for their products in mobile phone apps approved for use by seven-year-olds (Davies, June 19, 2019).

30 Children are also exposed to gambling adverts through tie-in deals between celebrities popular among children and young people, and gambling firms.

The Bishop of St Albans has condemned YouTube stars for participating in events supported by gambling companies.

Policymakers have previously raised concerns that celebrities are followed by children online and use their social media presence to encourage gambling (Witherow, November 22, 2018).

Young people will continue to be exposed to gambling adverts if regulations are not tightened. The impact, as discussed in the response to Question 13, is hard to establish, but advertising and marketing has been shown recently in British studies to 'influence the normative environment for gambling and encourage some youth to want to gamble' (Wardle, 2019).

40 In short, people do not make choices in a vacuum and if children are growing up with the rate of adverts, and accessibility to products, they are currently experiencing, Great Britain risks seeing a huge health problem in the future.

Other aspects of concern are the increasing normalisation of gambling in the perception of children.

This includes loot-boxes, which do not meet the definition of gambling in the Act, but ‘rarely fail to meet the psychological definition of gambling, even when they do not meet the legal definition’ (Taylor, December 12, 2018).

Whether or not loot-boxes are gambling, it has been suggested that these products can prime a child’s brain to gamble in the future, and to normalise the concept behind gambling.

**Recommendation:**

10 There is enough evidence suggesting children and young people are not being adequately protected from gambling-related harm, are more vulnerable to the harms of gambling than adults, and that significant concern exists in the public consciousness.

Young people must be better protected. This includes immediate revocation of licences for operators found to have had under-18s using their products. A Government-led policy to combat the normalisation of gambling amongst children, alongside a total and complete end of any gambling adverts exposed to children, would be greatly welcomed.

## QUESTION 16 AND 17

20 *The legal availability of certain forms of commercial gambling to under-18s in Great Britain is unusual by international standards and has been described as an ‘historic accident.’ Should young people between 16 and 18 be able to purchase National Lottery products, including draw-based games, scratch cards and online instant wins?*

*Should children be allowed to play Category D games machines (which include fruit machines, pushers and cranes)?*

**Answer:**

The legal availability to under-18s of National Lottery products, both instant-win and draw-based games is regrettable. Category-D gaming machines are also legally played on by children which is equally regrettable.

**Background:**

30 As has been established, (see the response to Question 15), children are particularly vulnerable to gambling-related harm and access to gambling products at a young age are thought to prime young minds towards gambling-related harm in their future.

Great Britain is unique in the exceptions it makes for certain types of activities deemed to be gambling.

Research provided by the House of Lords Library reveal Italy, Germany, Portugal, and Denmark all prohibit gambling below the age of gambling 18 with no exceptions.

Belgium prohibits access to people younger than 21 gaming arcades and casinos and all forms of betting are banned for under-18s.

Similarly, France prohibits all types of slot machines, which Category-D machines would plausibly fall under in French law, other than in casinos which bans minors from entering.

40 The British exceptionalism that Category-D machines and National Lottery purchases reveals is of great alarm to those concerned by gambling-related harm.

Access to gambling products at a young age has often been associated with problematic relationships with them in the future (as discussed in the response to Question 15). This understanding is commonly accepted in general discussions around gambling.

In the BBC's documentary 'Can You Beat The Bookies?' both the host and those affected by gambling-related harm had started gambling under the age 18.

**Recommendation:**

While the CofE, the General Synod, or the EIAG has not made any public statement on these products, protecting children and young people is core to the witness and mission of the Church more widely.

- 10 Therefore, any attempts to rectify this 'historic accident' would be welcomed as children and vulnerable people both need, and deserve, the most stringent protection possible.

Gambling should begin at 18 years of age, with no exceptions, and the Government would be strongly supported by many actors, including MPAC, if it adopted this policy.

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