



Gambling Related Harm APPG

Betting, Gaming, Lotteries and Amusements (Amendment) Bill

Call for evidence and views

This is not an official publication of the House of Commons or the House of Lords. It has not been approved by either the House or its committees. All Party Parliamentary Groups are informal groups of Members of both Houses with a common interest in particular issues. The views expressed in this report are those of the Group. The research for the report was undertaken by the members of the Group. The report was drafted by Interel, the Group Secretariat - the Secretariat is funded by Derek Webb.

1. The Gambling Related Harm APPG welcomes the opportunity to respond to this call for evidence. The group was established to address the issues associated with gambling related harm and in particular, successfully campaigned for a £2 minimum stake on Fixed Odds Betting Terminals.
2. We hold regular evidence sessions and contribute to policy making and raising issues within government. Although the majority of work is in Westminster, the expertise and evidence we have received means makes us well positioned to provide some observations on the proposed bill.
3. We welcome any moves which protect public from gambling harm and ensure all operators act responsibly. However, it is clear that gambling harm has increased exponentially with the advent of online platforms in the past few decades. Online gambling must be a key consideration of the next stage of reforms and with this in mind, we have shared some of our recommendations later in this submission, for consideration in future.
4. This submission responds to questions where we feel able to provide input.

Q28: Clause 14: "Industry Levy". This Clause inserts a new Article 172A (Industry Levy) into the 1985 Order to will allow the Department to make regulations with regard to the payment of a levy to the Department by every person who intends to apply for the grant or renewal of a bookmakers' licence, bookmaking office licence, bingo club licence, gaming machine certificate or permit and amusement permit. Do you think that is right to introduce such a levy?

A: Yes

5. The GRH APPG has long called for the introduction of a statutory levy, alongside many of our partners, stakeholders and experts that have given evidence to us.
6. While the largest firms in the UK have committed around £100m to fund research, education and treatment, a statutory levy is urgently needed to ensure that there is continuity and visibility of funding, that there is a sufficient level of funds and that forward planning for researchers and treatment providers can be facilitated. A levy should apply to land based and online operators.
7. We agree a levy should be put on a statutory footing and not placed at the whim of operators. It should also be a smart levy based on the principle that the 'polluter pays' so that those who cause the most harm pay the most. It is essential that online operators are required to pay the levy. This is also a key recommendation we have made in our representations to the UK government's Gambling Act review.
8. Any levy and funding should be administered independently of industry influence and allocated in collaboration with public health officials, to direct the funding to the most effective activities.

Q29: Clause 14: The aim of the levy is that it will be expended on projects related to gambling addiction or other associated forms of harm and exploitation and that financial assistance may be provided by grants, loans or any other form of financial assistance. Do you think that this is an appropriate use of the levy?

A: Yes

9. As noted in our response to the previous question, we agree with the principle of a levy on a statutory basis.
10. Gambling harm should be addressed as a public health issue, which includes providing the right education, treatment and research to support those suffering from harm. The wider public should be given the information and tools to evaluate and respond to the potential harms of gambling.
11. The allocation of funding to these projects and financial assistance should be managed through a strategy which ensures funding is as effective as possible. This should be led independently of the industry, involving healthcare and education professionals.

Q31: Clause 15: "Code of Practice". This Clause inserts a new Article 180A (Code of practice) into the 1985 Order and requires the Department to issue one or more mandatory Codes of practice about the manner in which facilities for gambling are provided. Do you feel that such a mandatory Code(s) of practice is appropriate?

A: Yes

12. We agree that it is important to introduce a requirement for operators to adopt minimum standards so there is consistency across industry and protections in place for people that are vulnerable to gambling harm. A code of practice is one measure that can help with this. A key question is how these codes would be enforced.

Q32: What kinds of Codes of practice do you think the Department should issue?

13. Although it may be set through secondary legislation rather than codes of practice, we strongly recommend that there should be limits on speed of play, stake size and winnings for gaming machines. As an example, we successfully campaigned for a £2 stake limit on Fixed Odds Betting Terminals.
14. Other areas which might be addressed include key topics such as: social responsibility provisions, prevention of money laundering, consumer protection and fairness, restrictions on advertising and targeting of vulnerable audiences.

Q36: What issues would you like to see addressed in the second stage of the reforms?

15. The Gambling Related Harm APPG has been calling for reform to gambling regulation to protect the public, and the most vulnerable, from gambling harm. To achieve this, any future reforms in Northern Ireland must include modern regulation for online operators, where the sector has grown exponentially.
16. Our start point is that gambling harm must be approached as a public health issue which has the potential to harm the whole population, not just vulnerable groups. This should prioritise prevention of harm first, based on the evidence of the impact of the problem, and its drivers. Within any preventative strategy, there must also be interventions targeted towards sub-groups of the population: those at risk of harm, those experiencing harm, and those affected by others' harm.
17. This approach would address the ways in which gambling products generate harm, but also social, cultural and economic factors that contribute to this and define how gambling is promoted. It would require a collaborative approach across government and stakeholders also including education and awareness raising.
18. Our main recommendations, which have also been made to the UK government's Gambling Act review are:
 - Introduce stake limits for online gambling to create parity with land-based venues - including a £2 stake on harmful slot content.
 - Introduce affordability checks to protect players from harmful activity (with a soft cap of £100). This would be overseen by a regulator.
 - 'VIP' schemes and other harmful incentives offered by gambling operators to customers should be banned.
 - There should be a duty of care which requires operators to protect consumers from harm.
 - A "smart", mandatory levy should be applied to operators to fund safer gambling initiatives and research, with the most harmful paying the most.
 - There should be a ban on all advertising in sport, on direct marketing and on inducements. Stronger advertising restrictions on broadcast, online, streaming and social media advertising should be brought in to limit the exposure of children to gambling.
 - Any regulatory body or oversight should have the capacity to regulate online gambling, with appropriate funding and oversight of spending.
 - There must be a gambling ombudsman available to provide redress for consumers.