

31 March 2021

By email to: gamblingactreview@dcms.gov.uk

Dear Sirs

Institute of Licensing response to the call for evidence by the DCMS re the Review of the Gambling Act 2005

The Institute of Licensing (IoL) is the professional body for licensing practitioners in the UK with over 4000 licensing practitioners within the membership from industry, private practice, local government and police.

IoL members have been surveyed to gather views to inform the IoL response to the call for evidence, and the response rate is low with only 13 responses to the IoL survey (11 from local authorities, 1 from police and 1 from industry members).

This response reflects the views expressed in the survey results, and also the views submitted to the Select Committee on the Social and Economic Impact of the Gambling Industry in 2019.

The questions set out in the call for evidence are below with survey responses summarised, and the survey responses are also attached in full.

Online protections - players and products

Q1: What evidence is there on the effectiveness of the existing online protections in preventing gambling harm?

Local authorities are not involved in the regulation of online gambling, and survey responses reflect this. However, the response from our industry members refers to a reported decrease in problem gambling rates according to the latest statistics from the Gambling Commission.

Other responses point to evidence of an increase in online gambling, referring to the Gambling Commission's Annual Participation Survey published in 2020, finding that 21% of survey respondents had gambled online in the past four weeks, an increase from 18% in the previous year, with a further 2.7% increase reported by the Commission reported in 2021 as a result of the COVID-19 pandemic and restrictions on social activities.

There are additional concerns that visual warnings are ineffective and online gambling is very easy to access, with verification systems providing little protection.

Q2: What evidence is there for or against the imposition of greater controls on online product design? This includes (but is not limited to) stake, speed, and prize limits or pre-release testing.

Further reference within survey responses to the reported decrease in problem gambling rates, but other responses indicate support for greater controls and more consistency of regulation across land based and online gambling.

Q3: What evidence is there for or against the imposition of greater controls on online gambling accounts, including but not limited to deposit, loss, and spend limits?

Responses support more controls, although one response warns that there is a risk of unintended consequences if controls are disproportionate, pointing to Sweden as an example of this. Others support the greater control on product design, spending (acknowledging recent changes such as credit card controls) and access by children.

Q4: What is the evidence on whether any such limits should be on a universal basis or targeted at individuals based on affordability or other considerations?

Responses are varied, but acknowledge the complexity of setting individual limits, and balancing this with social rights. There is further suggestion of bank involvement to incorporate affordability checks.

Q5: Is there evidence on how the consumer data collected by operators could be better deployed and used to support the government's objectives?

There is a suggestion that local or regional data would allow authorities to target any areas where there appears to be gambling related harm and look at the social demographic data of problem gamblers such as women, BAME and people from lower socio-demographic backgrounds. This data will help target the support required by the most appropriate method. Additionally, local data will allow an evidence-based reason to attach relevant conditions to licences to promote the gambling objectives.

Q6: How are online gambling losses split across the player cohort? For instance, what percentage of GGY do the top and bottom 10% of spenders account for, and how does this vary by product?

No comment.

Q7: What evidence is there from behavioural science or other fields that the protections which operators must already offer, such as player-set spend limits, could be made more effective in preventing harm?

No comment.

Q8: Is there evidence that so called ‘white label’ arrangements pose a particular risk to consumers in Great Britain?

No comment.

Q9: What evidence, if any, is there to suggest that new and emerging technologies, delivery and payment methods such as blockchain and crypto currencies could pose a particular risk to gambling consumers?

Responses reflect concern that crypto currencies are already causing confusion and concern, and should not be permitted as a form of payment for gambling. It may be that it is simply too early to make an informed judgement on such technologies.

Recent conversations as a result of the COVID-19 pandemic, have highlighted the difficulties presented by some regulatory arrangements which have proven to be inflexible where circumstances have significantly changed. It would be worth considering this when reviewing the Gambling Act, with a view to enabling changes in the future, where appropriate and evidence-based, due to advances in technology or changes in circumstances.

Q10: Is there any additional evidence in this area the government should consider?

Responses support a careful review of the Gambling Act, and there is a suggestion that a public health approach should be taken.

We would highlight the difference between a public health ‘approach’ and any suggestion that the Gambling Act should including a public health objective. The distinction has previously been considered in some detail for the Licensing Act 2003, when it was reviewed by the House of Lords Select Committee, with the conclusion set out in the report as follows:

“All Governments should adopt policies attempting to reduce the harmful consumption of alcohol. The Government has done so for England and Wales, the Scottish Government for Scotland, and in later chapters we note steps which could be taken within the licensing system to take forward this policy. But putting ourselves in the position of a licensing authority having to decide whether to refuse an application, or to impose conditions, we do not believe that the promotion of public health is capable of relating to specific premises and particular licensing applications.

“Promotion of health and well-being is a necessary and desirable objective for an alcohol strategy, but we accept that it is not appropriate as a licensing objective.”

Advertising, sponsorship and branding

Q11: What are the benefits or harms caused by allowing licensed gambling operators to advertise?

In our response to the Select Committee on the Social and Economic Impact of the Gambling Industry in 2019, the IoL advised that advertising and online gambling were strong themes of concern. The concerns were that gambling is being normalised or even glamorised, and that gambling is too accessible, particularly online and via social media. On balance, the IoL response cited a clear need to curtail advertising, with a possible exception for limited advertising for a newcomer into the market.

Survey responses indicate similar concerns now, although perceptions are that advertising is relatively easily regulated. An additional submission is that allowing licensed operators to advertise, plays a role in assisting customers in identifying licensed from unlicensed operators, as well as driving safer-gambling behavioural change.

Q12: What, if any, is the evidence on the effectiveness of mandatory safer gambling messages in adverts in preventing harm?

There is uncertainty about the effectiveness of current messaging. Respondents point out the significant differences in the ability of supervision within licensed premises, compared with online gamblers, and also that the messaging focuses on gambling responsibly without highlighting the potential consequences of problem gambling.

Q13: What evidence is there on the harms or benefits of licensed operators being able to make promotional offers, such as free spins, bonuses and hospitality, either within or separately to VIP schemes?

Responses indicate unease but a lack of evidence about the harms or benefits. One points out that

‘VIP schemes only target the wealthy who can usually afford to lose. A business is unlikely to offer accommodation and flights as an incentive to travel to an operator’s casino. Other forms of promotion such as club membership offering reduced meal costs, free spins, reduced or free beverages and slightly grander facilities, such as a members’ lounge; are common around the world. These schemes are provided to encourage customers to gamble at the operator’s premises. This can be controlled, but online promotions are more difficult to control and should not be permitted.’

Q14: What is the positive or negative impact of gambling sponsorship arrangements across sports, esports and other areas?

The Select Committee on the Social and Economic Impact of the Gambling Industry asked about the risks of gambling sponsorship given that *‘Gambling is becoming an integral part of a growing number of sports, with increasingly close relationships between operators and sports clubs, leagues and broadcasters’*. In its response, the IoL commented that the risks concern the normalisation / glorification of gambling strongly linked to advertising and stricter controls are essential.

Survey responses confirm concerns around the impact on children and young people who regularly attend or watch sporting events and are therefore exposed to gambling advertising which, by its nature, is designed to encourage gambling.

On the other hand, some sports rely on sponsorship. Examples cited include horse and dog racing. Stricter controls may be the correct balance.

Q15: Is there any additional evidence in this area the government should consider, including in relation to particularly vulnerable groups?

Only one comment from the survey which states 'They really need to specify what vulnerable are defined as and more to the point, how they are identified for the benefit of dealing with gambling issues. High St bookmakers have many people in them I would consider "vulnerable" on the basis of their finances alone, yet how do we recognise them?'

Gambling Commission's powers and resources

Q16: What, if any, evidence is there to suggest that there is currently a significant black market for gambling in Great Britain, or that there is a risk of one emerging?

Survey responses refer to recent research reports that usage and spend with unlicensed online gambling operators has grown significantly in the last 1-2 years, with the number of players using unlicensed sites increasing from 210,000 to 460,000, and the amounts wagered increasing from £1.4bn to £2.8bn.

There is an additional concern that tighter restrictions may drive growth within the black market.

Q17: What evidence, if any, is there on the ease with which consumers can access black market gambling websites in Great Britain?

No comment.

Q18: How easy is it for consumers to tell that they are using an unlicensed illegal operator?

There is significant difference between online and land-based operators, as licensed premises are generally required to display licences. Online is perceived as being much more difficult for consumers to identify unlicensed illegal operators.

Q19: Is there evidence on whether the Gambling Commission has sufficient investigation, enforcement and sanctioning powers to effect change in operator behaviour and raise standards?

There are mixed views on this question. Local authorities comment that there is a lack of intervention or action locally with a perceived expectation on the part of the Commission that local authorities will lead on investigations. Responses also note, with regret, the withdrawal of local Gambling Commission

contacts which we believe is a result of internal reorganisation and perhaps a refocus on online gambling.

Q20: If existing powers are considered to be sufficient, is there scope for them to be used differently or more effectively?

Two responses via the survey which include the following points:

- The Gambling Commission needs to be better resourced, share information and provide better assistance to Local Authorities. Local assistance is all but non-existent.
- Targeting unlicensed operators should be a main priority.
- Work more collaboratively with licensed operators.
- Apply more rigour in evaluating the impact of regulatory intervention.

Q21: What evidence is there on the potential benefits of changing the fee system to give the Gambling Commission more flexibility to adjust its fees, or potentially create financial incentives to compliance for operators?

There is some support for financial incentives, if subject to more than simple compliance with conditions.

Q22: What are the barriers to high quality research to inform regulation or policy making, and how can these be overcome? What evidence is there that a different model to the current system might improve outcomes?

Responses highlight the lack of information around gambling harms and links to specific licensed premises. A further comment that the complexity of the system leads to a mixed level of understanding within the regulators about the legal requirements.

Q23: Is there evidence from other jurisdictions or regulators on the most effective system for recouping the regulatory and societal costs of gambling from operators, for instance through taxes, licence fees or statutory levies?

No comment.

Q24: Is there any additional evidence in this area the government should consider?

No comment.

Consumer Redress

Q25: Is there evidence of a need to change redress arrangements in the gambling sector?

No comment.

Q26: If so, are there redress arrangements in other sectors or internationally which could provide a suitable model for the gambling sector?

No comment.

Q27: Individual redress is often equated with financial compensation for gambling losses. However, there may be risks associated with providing financial lump sums to problem and recovering gamblers, or risks of creating a sense that gambling can be 'risk free'. Are there other such considerations the government should weigh in considering possible changes to redress arrangements?

No comment.

Q28: Is there any additional evidence in this area the government should consider?

No comment.

Age limits and verification

Q29: What evidence is there on the effectiveness of current measures to prevent illegal underage gambling in land based venues and online?

Responses indicate that there is little evidence to show that the current measures are ineffective, and local test purchases where cited have shown positive results. That said, the access to gambling by children remains a concern, particularly in relation to advertising and online gambling, and there is support for continued vigilance and even tighter controls.

Q30: Is there evidence of best practice, for instance from other jurisdictions, in how to prevent illegal underage gambling?

Test purchasing.

Q31: What, if any, evidence is there on the number of 16 and 17 year olds participating in society lotteries?

No evidence is offered. One response recommends that the age limit be set at 18yrs.

Q32: What, if any, evidence is there to show an association between legal youth engagement in society lotteries and problem gambling (as children or adults)?

No comment.

Q33: Is there comparative evidence to support society lotteries and the National Lottery having different minimum ages to play?

No comment.

Q34: What are the advantages and disadvantages of category D slot machine style gaming machines being legally accessible to children?

Advantages: they are entertaining and fun to play and provide the potential for teaching responsible gambling.

Disadvantages: they may attract children to chase their losses

Q35: Is there evidence on how the characteristics of category D slot machine style gaming machines (for instance whether they pay out in cash or tickets) factor into their association with harm in childhood or later life?

No comment.

Q36: What, if any, is the evidence that extra protections are needed for the youngest adults (for instance those aged between 18 and 25)?

Comments include a statement that evidence (not provided) at William Hill indicates that any increased risk is suitably managed. A further comment that education of gambling issues is key to children and young people.

Q37: What evidence is there on the type of protections which might be most effective for this age group?

No comment.

Q38: Is there any additional evidence in this area the government should consider?

One response (which is a reiteration of a response to an earlier question) answers by supporting a public health approach to gambling regulation and policy and the provision of local data to allow additional support from local authorities.

Land based gambling

Q39: What, if any, changes in the rules on land-based gambling would support the government's objectives as set out in the document? Please provide evidence to support this position, for instance how changes have worked in other countries.

Responses within the survey include two very different perspectives as quoted below:

"I am from Western Australia where I was a Police Officer for 39 years. For part of that time, I was a Liquor and Gaming Branch Officer. In Western Australia there is only one casino, located in Perth. Gambling permits can be obtained to run gaming nights, but no gaming machines are permitted outside of the casino. 2-up is permitted by Regulations in Kalgoorlie or by a permit. The proliferation of gaming machines in the UK, especially permitting their use in alcohol licensed premises, is of particular concern."

“William Hill believe there is an opportunity to update legislation in this area, particularly regarding improved use of technology. William Hill propose Licensed Betting Offices be given the ability to provide devices for customers to access online accounts while in shop as well as the use of multi-functional machines used for gaming or self-service sports betting. William Hill advocate the use of facial recognition technology in all Licensed Betting Offices as a tool to assist safer gambling and request Government support to review relevant legislation so that this can be brought in.”

Q40: What evidence is there on potential benefits or harms of permitting cashless payment for land-based gambling?

No evidence is provided, and a variety of views including unease, opposition and support for the ability of customers to use cashless payments (excluding credit cards).

Q41: Is there evidence that changes to machine allocations and/or machine to table ratios in casinos to allow them to have more machines would support the government’s objectives?

One comment that increasing the number of machines will enable more customers to gamble at any one time.

Q42: What is the evidence that the new types of casino created by the 2005 Act meet (or could meet) their objectives for the sector; supporting economic regeneration, tourism and growth while reducing risks of harm?

No evidence provided although there are some speculative comments.

Q43: Is there evidence on whether licensing and local authorities have enough powers to fulfil their responsibilities in respect of premises licenses?

Comments from our survey are listed below:

I find that Local Authorities don't feel they have the power or support to combat issues they identify and face pressure from the legal framework when facing big business.

There is no evidence that LA's are able to fulfil their responsibilities and have the right powers.

We're not aware of any evidence, we've never had to take anyone to review.

Our local gambling operators do police themselves well in this area.

Licensing Authorities already have powers to ensure they only grant premises licences to responsible operators. They are also able to add conditions to licences, where they deem them to be required, and they have ultimate power to review, and if necessary revoke any licences that are not operated responsibly. Local Authorities also have planning regulation, which can control the number of gambling premises in a location.

As a national operator, William Hill are aware of the divergence of some Local Authority policies, making compliance with each more difficult for a nationally represented operator. It is suggested that policies should be brought back into a more standard template.

Our view is that the current legislation does not allow licensing authorities to fulfil their responsibilities in respect of determining premises licence applications. Licensing authorities are often presented with new

premises licence applications and have no option but to grant an application, even though the opinion maybe that any further applications in a particular area would increase gambling harm. It is almost impossible to challenge an application without a link between a premises and evidence of harm. If the below recommendations were incorporated into regulation this would assist responsible authorities and other persons to make representations on evidence and allow local authorities to use the power it has been delegated to determine applications in the correct manner.

1) Public Health to become a licensing objective and for public health experts to be a responsible authority. It is vital that the health impacts of gambling are recognised in regulation. In our view there should be a public health approach for all gambling activities - Public health must be a consideration when determining applications and public health experts are best placed to comment on any application. With Public Health as a responsible authority for alcohol licensing, it seems inconsistent to not also have this within gambling regulation.

2). Local data required (as stated in Q5) Local or regional data would also allow authorities to target any areas where there appears to be gambling related harm and look at the social demographic data of problem gamblers such as sex, age, BAME and people from lower sociodemographic backgrounds. This data will help target the support required by the most appropriate method. Additionally, local data will allow an evidence-based reason to attach relevant conditions to licences to promote the gambling objectives.

With limited local data available on where there are areas of gambling harm it is difficult for responsible authorities or other parties to make representations to applications based on evidence. As a result, either representations are not submitted, and the application is automatically granted, or the licensing authority does not have the necessary evidence to challenge and take the most appropriate action.

3) Cumulative Impact Policies (CIPs) are permitted within the Licensing Act 2003 for alcohol licensed premises and the same should be considered for the gambling regime. If an area suffers from an over concentration of gambling premises which is having a detrimental impact on the local area and one of more of the objectives, local authorities could designate areas as saturated. As a result, this would put the onus on the applicant to ensure that any new/variation to an application would not cause further harm.

Q44: Is there evidence that we should moderately increase the threshold at which local authorities need to individually authorise the number of category D and C gaming machines in alcohol licensed premises?

There is no evidence offered or substantial support for this within our survey responses.

Q45: Is there any additional evidence in this area the government should consider?

One response within the survey as follows:

- William Hill believes all gaming machines should conform to standard safer-gambling standards, regardless of the type of premises in which they are situated. This is not the case at present.
- William Hill believe Licensed Betting Offices would be a suitable environment in which to sell National Lottery products.
- William Hill propose betting shops should be classified as part of the retail sector, to avoid any confusion in the future.
- William Hill also seek clarification on the sale of food and non-alcoholic beverages within a Licensed Betting Office.

Conclusion

Inevitably, IoL survey responses show a variety of views about gambling regulation and the questions posed within the call for evidence. There are consistent themes concerning online gambling, advertising, and the difficulties of identifying and subsequent provision of support for problem gambling.

Industry operators play a valuable role in supervising activities within licensed premises, and there is a definite need for industry practitioners to be aware of the signs to identify problem gambling and vulnerability, as well as implementing measures to offer support and signposting.

Gambling on licensed premises provides a social hub and a controlled (supervised) environment. This is completely lacking in online gambling, and there are concerns around advertising and accessibility of gambling online to all ages and vulnerabilities.

I hope that this response and information is of assistance to the DCMS. The Institute of Licensing would be happy to work with the DCMS to further discussions and proposals on the Gambling Act review.

Yours faithfully



Sue Nelson
Executive Officer

IoL Member Survey - Review of the Gambling Act 2005 (Jan 2021)

1. Introduction
2. About you (contact information removed)
3. Call for Evidence Questions - Online protections - players and products

4. Q1: What evidence is there on the effectiveness of the existing online protections in preventing gambling harm?			Response Percent	Response Total
1	Open-Ended Question		100.00%	10
1	None			
2	Very little effectiveness from what I can see. Having visual warnings doesn't prevent gambling addiction/issues. Online gambling is very easy and convenient to access from the comfort of home/work. This is reflected in the online figures for online gambling being the highest revenue stream			
3	we do not have access to any such evidence - and as a local authority we do not have the remit of online gambling			
4	Unknown			
5	Currently we feel that there is no evidence to show that there is any protection to online gambling. I am aware of cases where people have gambled away in excess of £30,000, losing their house, their personal relationship went in to turmoil. In this day and age, it is so easy to provide false information to to get through verification on online gambling.			
6	We aren't aware of any evidence			
7	Latest Problem Gambling figures from the Gambling Commission state a problem gambling rate of 0.3%, a decrease from 0.5% in 2018.			
8	We are not aware of anything specific.			
9	Not aware of the effectiveness but am aware of some failures in the system due to media reports.			
10	<p>The Licensing Authority do not regulate or have any involvement in online gambling. However, having regulated and enforced land-based gambling and with our knowledge of gambling and gambling harm, we have the following comments:</p> <p>There has been limited evidence provided on the effectiveness of online protections, however, there is evidence of an increase in online gambling. The Gambling Commission's Annual Participation Survey published in 2020, found that 21% of survey respondents had gambled online in the past four weeks, an increase from 18% in the previous year. During the Covid19 pandemic the commission reported in 2021 that there has been an increase of 2.7% in online gambling.</p> <p>As reported by the House of Lords Gambling Harm -Time for Action -Select Committee on the Social and Economic Impact of the Gambling Industry, published in July 2020 - The NatCen report on gambling behaviour found the prevalence of problem gambling within online gambling or betting is 3.5%, in comparison to the prevalence of 0.7% of problem gamblers across the population. The prevalence rate for online gambling on slots, casino or bingo games is considerably higher at 9.2%. The committee also reported that online gambling has also had an impact on the numbers of young people gambling. The report stated that there had been a small, but significant increase in online gambling between 2017 and 2019; from 1% of 11-16 year olds gambling online in the past seven days in 2017 and 2018, to 3% in 2019.</p> <p>With online high-risk games such as slots, bingos and casinos having no limit on how quickly you can place more money, they tend to be the type of games where people often chase their losses. Given the Covid 19 situation, these games are currently only played on-line. The terms of reference attached to this review states that 1.4 million adults have engaged in loss chasing behaviour. This is</p>			

4. Q1: What evidence is there on the effectiveness of the existing online protections in preventing gambling harm?

		Response Percent	Response Total
	<p>then a concern as with the lack of current controls in place, a proportion of these currently low risk gamblers could potentially develop into problem gamblers.</p> <p>Although measures are in effect to prevent gambling harm, based on the above (and with limited evidence), it would seem that the current measures are not as effective as they could be and stricter controls should be implemented to reduce gambling harm and those most vulnerable.</p> <p>Gambling related harms are the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society. These harms are diverse, affecting resources, relationships and health as well as having a detrimental impact on a persons mental health.</p>		
		answered	10
		skipped	3

5. Q2: What evidence is there for or against the imposition of greater controls on online product design? This includes (but is not limited to) stake, speed, and prize limits or pre-release testing.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	9
1	Only by referring to Government site		
2	Gambling problems reported each year are on the increase. Online gambling is detached and isolated and the perfect environment for people to get themselves into trouble should issues begin to arise.		
3	not in the remit of the local authority		
4	Unknown		
5	I am not sure about evidence, but I do feel that we need to include banks, credit card companies, building societies in to any consultation and put some responsibility on them so they can input measures on card transactions, to be able to identify where a card has not been used for online gambling before, is this the right person or has the card been stolen etc.		
6	We're not aware of any evidence		
7	Sorry we don't under the question. We do believe that online product design should be done in a manner that does not imply that they will be able to win big as this is just not realistic		
8	Unsure		
9	<p>As the Licensing Authority we do not regulate online gambling and we have no specific evidence, however, we have the following brief comments regarding two elements " stake and speed.</p> <p>Stake & Speed " Unlike with land-based machines FOBT™s that have a statutory limit there are currently no regulations restricting stake limits for any form of online gambling. Our view is that there should be consistency of regulation across both land and online markets. Without this control the total someone can gamble could increase quite dramatically and escalate very quickly. The evidence suggests that quick fire gambling, does not allow the player time to think, which can then lead to loss chasing behaviour. Controls should therefore be implemented which slow downplay and allow the player time to think and consider their actions.</p> <p>In line with the reasoning stated in Q1, we fully recommend the government undertakes a full review of all elements within product design and considers tighter controls to reduce gambling related harm and protect those most vulnerable.</p>		
		answered	9
		skipped	4

6. Q3: What evidence is there for or against the imposition of greater controls on online gambling accounts, including but not limited to deposit, loss, and spend limits?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	11
1	Only by referring to Government site		
2	I think the need for greater control is reflected in the current review of Gambling Act and certain changes made, such as banning the use of credit cards for gambling. Change is slow and the industry is powerful. The Gambling Licence objectives are wishy-washy and unspecific in many ways.		
3	not in the remit of the local authority		
4	Still a fair percentage of adult problem gamblers that has not particularly decreased over the last few years.		
5	Unknown		
6	Any online accounts, I feel they should have to be verified by someone who can see the person face to face, identify the documents, or if online face recognition to be introduced so that any photo ID can be verified using face recognition. There should be some sort of limit based on someone's earnings, and whether again banks would be able to assist in this to say well as this persons earning is this amount, this is the maximum after all overheads they can gamble.		
7	We're not aware of any evidence		
8	Evidence from other jurisdictions, such as Sweden, show there is a risk of unintended consequences arising from the imposition of restrictions and measures that are perceived as disproportionate.		
9	We do believe that online product design should be done in a manner that does not imply that they will be able to win big as this is just not realistic. what controls are in place for stop people depositing online beyond what they can afford? who monitors online how much people are loosing and spending? what controls are in place to stop children gambling on parents accounts?		
10	Unsure		
11	As the Licensing Authority we do not regulate online gambling and therefore have no direct evidence, however we are responsible for regulating premises which sell alcohol. In this regard, should a customer on licensed premises have drunk too much alcohol, it is then illegal for them to be served more alcohol. In this instance the control is taken from the person who has consumed too much alcohol and they are not permitted to drink any more within that premises. The same concept should be applied in relation to gambling, if there are no limits on how much you can spend, lose or deposit then a person's gambling can easily become out of control. We fully support that prevention measures should be implemented in the first instance to reduce the likelihood of someone becoming a problem gambler, however if someone is a problem gambler in relation to deposit, loss and spend limits then our view is that control should be removed from the player. Currently the player sets the deposit, loss and spend limit rather than the operator, which does not seem adequate for addressing and preventing gambling related harm. In line with the reasoning stated in Q1, we fully recommend the government undertakes a full review of all elements within online gambling accounts and considers tighter controls to reduce gambling related harm and protect those most vulnerable.		
		answered	11
		skipped	2




7. Q4: What is the evidence on whether any such limits should be on a universal basis or targeted at individuals based on affordability or other considerations?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	9
1	Only by referring to Government site		

7. Q4: What is the evidence on whether any such limits should be on a universal basis or targeted at individuals based on affordability or other considerations?

		Response Percent	Response Total
2	Limiting a stake is obviously a way to slowdown expenditure made by the customer. I'm unsure how a third party Gambling establishment could establish the affordability of an individual to have higher or lower bets. Surely this wold depend on the honesty and integrity of the player to impart financial details?		
3	not in the remit of the local authority		
4	Evidence that it is problematic to impose conditions on adults being able to choose how to spend their own money and numbers are too great to be able to focus on individuals, as well as taking into consideration their social rights.		
5	Unknown		
6	There should be some sort of limit based on someone's earnings, and whether again banks would be able to assist in this to say well as this persons earning is this amount, this is the maximum after all overheads they can gamble. Totally agree with this, affordability check seems to be working for mortgage lenders and banks when applying for loans or credit cards. Again, how much evidence do we have? We do have the evidence that affordability checks works for mortgages and banks.		
7	We're not aware of any evidence		
8	It should be done on a universal basis and affordability in line with ensuring people are adults.		
9	Unsure		
		answered	9
		skipped	4

8. Q5: Is there evidence on how the consumer data collected by operators could be better deployed and used to support the government's objectives?

		Response Percent	Response Total
1	Yes 	18.18%	2
2	No 	9.09%	1
3	Don't know 	72.73%	8
		answered	11
		skipped	2

Detail / comments: (4)

1	Yes, depending on where someone is based, if to register you are required to provide your address and proof of address, we could possibly look to see what area has a higher number of people gambling and what their stakes are, should Local Authorities intervene?
2	We're not aware of any evidence
3	We have not seen such evidence
4	<p>The current data available is limited and therefore insufficient to ensure that correct regulation is in effect or that measures are targeted where they are required.</p> <p>If data was available on players behaviours such as how a player behaves on certain games (both online and land based), data on how a player responds to targeted advertising and data on the characteristics of those seeking help from operators including self-exclusion this would allow targeted action to promote the governments objectives.</p> <p>Without this core data the government, authorities and all other parties involved in regulating gambling premises are unable to formulate regulation, policies or relevant conditions which would not only target gambling related harm but also prevent gamblers becoming problem gamblers.</p>

8. Q5: Is there evidence on how the consumer data collected by operators could be better deployed and used to support the government's objectives?

		Response Percent	Response Total
	Local or regional data would also allow authorities to target any areas where there appears to be gambling related harm and look at the social demographic data of problem gamblers such as women, BAME and people from lower sociodemographic background. This data will help target the support required by the most appropriate method. Additionally, local data will allow an evidence-based reason to attach relevant conditions to licences to promote the gambling objectives.		


9. Q6: How are online gambling losses split across the player cohort? For instance what percentage of GGY do the top and bottom 10% of spenders account for, and how does this vary by product?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	7
	1 Unsure		
	2 I do not have knowledge of these figures.		
	3 not in the remit of the local authority		
	4 Don't know		
	5 We have no idea		
	6 Sorry we do not understand this question and we do not have this evidence.		
	7 Unsure		
		answered	7
		skipped	6

10. Q7: What evidence is there from behavioural science or other fields that the protections which operators must already offer, such as player-set spend limits, could be made more effective in preventing harm?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	7
	1 Unsure		
	2 Unsure		
	3 not in the remit of the local authority		
	4 Don't know		
	5 We're not aware of any evidence		
	6 We do not have this evidence.		
	7 Unsure		
		answered	7
		skipped	6



11. Q8: Is there evidence that so called "white label"™ arrangements pose a particular risk to consumers in Great Britain?

			Response Percent	Response Total
1	Yes		0.00%	0
2	No		0.00%	0
3	Don't know		100.00%	9
			answered	9
			skipped	4

12. Q9: What evidence, if any, is there to suggest that new and emerging technologies, delivery and payment methods such as blockchain and crypto currencies could pose a particular risk to gambling consumers?

			Response Percent	Response Total
1	Open-Ended Question		100.00%	9
1	Unsure			
2	These currency forms are already causing confusion and concern in their use, Does society need the complications of virtual currencies and the issues that have already started to show up? Gambling already has many issues to consider without adding to them.			
3	not in the remit of the local authority			
4	Evidence suggests that consumers are exposed to the risk that these form of currencies are not 'real money' and therefore the risk is not calculated by consumers.			
5	Too early to know. These currencies are out of reach for the average person. They are very expensive to purchase and are currently not accepted as payment by many businesses.			
6	We cannot really evidence this unless we have processes in place, we do know there are concerns over online Gambling, but without controls no evidence could be provided.			
7	We're not aware of any evidence			
8	sorry we do not have an indepth understanding of blockchain and crypton currencies so are unable to comment.			
9	Unsure			
			answered	9
			skipped	4

13. Q10: Is there any additional evidence in this area the government should consider?

			Response Percent	Response Total
1	Yes		11.11%	1
2	No		0.00%	0
3	Don't know		88.89%	8
			answered	9
			skipped	4

13. Q10: Is there any additional evidence in this area the government should consider?

		Response Percent	Response Total
Detail / comments: (2)			
1	I am concerned the government will simply whitewash the review of the Gambling Act and should take steps to ensure real control and care over it.		
2	There should be a public health approach for both online and land-based gambling. In our view it is essential that recommendations from public health experts are taken into consideration when amending gambling regulation and policy.		

4. Call for Evidence Questions - Advertising, sponsorship and branding

14. Q11: What are the benefits or harms caused by allowing licensed gambling operators to advertise?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	12
1	Not sure there are		
2	Adverts entice, make things appealing and often overlook the negatives of what is being sold. There should be limitations to advertisements and also a substantive warning that isn't simply glossed over in brief summary.		
3	By allowing operators to advertise there is a code of conduct that they must follow preventing irresponsible advertising. The harms of advertising is that it will be seen by young people and vulnerable people that might then decide to gamble.		
4	advertising can be seen by all, including young; normalisation of gambling as an activity - in peoples minds, if they advertised they must be legitimate and ok		
5	Benefits are that the advertising can be regulated and ensure that adverts are not attractive to children. The harm remains that adverts will attract new consumers and can be a draw for problem gamblers.		
6	The only beneficiary is the gambling operator. The possible harm to the community is vast. The advertisements are mostly depicting well dressed people winning. The harm that gambling can potentially cause is not promoted. Any advice about staying in control of your gambling and seeking help if it becomes a problem falls on deaf ears.		
7	I don't think the harm is not in advertising, it's how they advertise. When advertising with bright numbers, bingo balls, it all looks fun and appealing. Also now with multimedia, people can advertise on Facebook sites, snap and so on, and there is no way of identifying who they are advertising to, it could be a 12 year old child, it could be someone who has a history of gambling and is mentally unstable. These are all risks. I do not think there is any benefit in advertising Gambling, unless they make it very clear how it could affect someone and what the consequences could be.		
8	Aimed at vulnerable groups Advertising only shows younger people making friendships and having fun Only benefits to industry or as a revenue generator for advertising companies / TV channels / print media		
9	Benefits of allowing licensed operators to advertise include assisting customers in identifying licensed from un-licensed operators, as well as driving safer-gambling behavioural change.		
10	Could potentially make people believe they will win on every gamble or win big. Odds of winning need to be advertised more clearly and in plain English		

14. Q11: What are the benefits or harms caused by allowing licensed gambling operators to advertise?

		Response Percent	Response Total
11	Advertising should be restricted. There is far too much advertising permitted on TV with sponsorship becoming the norm. Social media pop ups are constant and adverts always suggest large wins. Clever none payment games (Free to play) are enticing younger people to take up gambling without knowing the risks. Like a player in a video game is killed but immediately comes back to life. No risk to the player.		
12	Exposure of vulnerable people to a harmful activity.		
		answered	12
		skipped	1

15. Q12: What, if any, is the evidence on the effectiveness of mandatory safer gambling messages in adverts in preventing harm?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	9
1	Not sure - But need to continue		
2	I believe those people who suffer from gambling addiction issues are NOT put off by mandatory gambling messages. Therefore, there are very effective.		
3	we suspect they have very little impact in preventing people from stopping if they are getting carried away		
4	It is my view that these messages are ineffective.		
5	I am not sure there is evidence that the mandatory safer gambling messages are working. Whilst at licensed premises you are able to verify, control how much someone is gambling, look at their body language, see if they are frustrated, intoxicated with alcohol or drugs, you can't do any of this with online.		
6	We're not aware of any evidence		
7	Sorry we do not have access to this evidence.		
8	Not sure		
9	Money lenders such as banks and mortgage providers all come with warning about repayments and consequences such as home can be repossessed. The Gambling safer messaging just talks about being responsible. It does not highlight the potential consequences such as brakup of families, loss of homes and businesses		
		answered	9
		skipped	4

16. Q13: What evidence is there on the harms or benefits of licensed operators being able to make promotional offers, such as free spins, bonuses and hospitality, either within or separately to VIP schemes?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	9
1	Not sure - But can only see issues for Gamblers with issues		
2	Financial enticements are inappropriate and bait people who might otherwise choose not to gamble at all.		

16. Q13: What evidence is there on the harms or benefits of licensed operators being able to make promotional offers, such as free spins, bonuses and hospitality, either within or separately to VIP schemes?

		Response Percent	Response Total
3	not in the remit of the local authority		
4	Offers and promotions will continue to attract new and existing consumers who can be become reliant of offers and will loss chase continuously.		
5	VIP schemes only target the wealthy who can usually afford to lose. A business is unlikely to offer accommodation and flights as an incentive to travel to an operators casino. Other forms of promotion such as club membership offering reduced meal costs, free spins, reduced or free beverages and slightly grander facilities, such as a members lounge; are common around the world. These schemes are provided to encourage customers to gamble at the operators premises. This can be controlled, but online promotions are more difficult to control and should not be permitted.		
6	I don't think there should be anything as free spins, you are then trying to get someone to gamble by offering this to them and really think there shouldn't be any offers.		
7	We're not aware of any evidence		
8	Sorry we do not have access to this evidence.		
9	Should not be permitted but unsure		
		answered	9
		skipped	4



17. Q14: What is the positive or negative impact of gambling sponsorship arrangements across sports, esports and other areas?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	12
1	Unsure		
2	Obviously sponsorship is a form of investment alongside promotion and advertising, so the pluses and minuses are obvious.		
3	Sports and esports are viewed by a large range of young people/children who may become exposed to gambling and therefore gambling sites.		
4	not in the remit of the local authority		
5	The risk that consumers are unable to enjoy sport without an element of gambling which could result in wider social problems of certain parts of society not participating in sport.		
6	These sponsorship arrangements should not be permitted. Children regularly attend sporting events and become used to advertising that can influence their choices and decision making in later life.		
7	Whilst I don't have see there being a problem in gambling sponsorship arrangements, we may need to understand, what age group is that sport targeting, for example previously where you had cigarette companies advertising on F1 cars? Are we promoting gambling,		
8	Aimed at vulnerable groups Advertising on shirts can encourage young children to associate gambling operators with sport as a good thing Only benefits as a revenue generator		
9	There are some sports who rely on sponsorship arrangements for their ongoing success and viability, the most obvious being horseracing and greyhound racing.		

17. Q14: What is the positive or negative impact of gambling sponsorship arrangements across sports, esports and other areas?

			Response Percent	Response Total
10	Encourages people to bet and could lead to peer pressure amongst friends to gamble more than can afford.			
11	TV advertising should be banned. There can be no control over the audience.			
12	The sponsored events have a source of income that allows the event to be run safely with appropriate insurance etc. . The negative is the exposure of the vulnerable to gambling.			
			answered	12
			skipped	1

18. Q15: Is there any additional evidence in this area the government should consider, including in relation to particularly vulnerable groups?

			Response Percent	Response Total
1	Yes		12.50%	1
2	No		0.00%	0
3	Don't know		87.50%	7
			answered	8
			skipped	5
Details / comments: (2)				
1	They really need to specify what vulnerable are defined as and more to the point, how they are identified for the benefit of dealing with gambling issues. High St bookmakers have many people in them I would consider "vulnerable" on the basis of their finances alone, yet how do we recognise them?			
2	We're not aware of any evidence			

5. Call for Evidence Questions - Gambling Commission's powers and resources

19. Q16: What, if any, evidence is there to suggest that there is currently a significant black market for gambling in Great Britain, or that there is a risk of one emerging?

			Response Percent	Response Total
1	Open-Ended Question		100.00%	9
1	Illegal machines turn up in Pubs. Clubs and pubs have Poker (Gambling Nights) are they within the limits?			
2	COVID 19 has certainly driven some reports of underground face to face gambling in my area, where people are meeting in groups to play cards etc.			
3	not known			
4	Don't know. No evidence has been provided that this is the case in my District.			
5	We're not aware of any evidence			

19. Q16: What, if any, evidence is there to suggest that there is currently a significant black market for gambling in Great Britain, or that there is a risk of one emerging?

		Response Percent	Response Total
6	Recent research by PWC found usage and spend with unlicensed online gambling operators has grown significantly in the last 1-2 years, with the number of players using unlicensed sites increasing from 210,000 to 460,000, and the amounts wagered increasing from £1.4bn to £2.8bn.		
7	we would not have any evidence or information.		
8	.		
9	The licensing authority have not been made aware of illegal (black market) issues within the borough or wider across Great Britain. However, our recommendation is this area of gambling is monitored closely. If tighter restrictions are implemented to reduce gambling related harm for land and online gambling, the black-market gambling sector may grow due to demand.		
		answered	9
		skipped	4

20. Q17: What evidence, if any, is there on the ease with which consumers can access black market gambling websites in Great Britain?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	6
1	Unsure - But in this day and age I'm sure there must be.		
2	Unsure.		
3	not known		
4	Don't know		
5	We're not aware of any evidence		
6	we would not have any evidence or information.		
		answered	6
		skipped	7

21. Q18: How easy is it for consumers to tell that they are using an unlicensed illegal operator?

		Response Percent	Response Total
1	Easy	0.00%	0
2	Not Easy	11.11%	1
3	Don't know	88.89%	8
		answered	9
		skipped	4

Detail / comments: (3)

1	online - would not know ; in person (betting shops, bingo halls etc) all must be licensed and display licence; grey area where
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21. Q18: How easy is it for consumers to tell that they are using an unlicensed illegal operator?

		Response Percent	Response Total
	temporary gambling/activities happen such as at pubs (eg bongo bingo) where it wouldn't always be clear to the consumer whether it has gone through any kind of authorisation process		
2	But how would they know that the operator is licensed?		
3	hard for us to comment on this as licensing professionals		

22. Q19: Is there evidence on whether the Gambling Commission has sufficient investigation, enforcement and sanctioning powers to effect change in operator behaviour and raise standards?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	8
1	From my Prospective very reluctant to use those powers. See to want the Local Authority to investigate		
2	Given the lax nature of the Gambling Act framework, the Commission has little power to my mind.		
3	not known		
4	The Gambling Commission is either woefully under resourced or poorly administered. As a District Licensing Officer I have to find the time to investigate gambling complaints, Inspect Gambling Premises, processes gambling licence applications and find time to promote the Licensing Objectives and Codes of Practice. Gambling is only one of many areas of responsibility. The Commission has even withdrawn our local contacts, who were not local in any event.		
5	I don't think there is enough sufficient enforcement, investigation powers, and there should be more powers, also Gambling Commission looking at providing training to local authority officers who can help with		
6	We're not aware of any evidence		
7	The Gambling Commission already has extensive and sufficient powers, though it is felt they could be used more effectively.		
8	Cannot comment as we have not reviewed the GC power's		
		answered	8
		skipped	5

23. Q20: If existing powers are considered to be sufficient, is there scope for them to be used differently or more effectively?

		Response Percent	Response Total
1	Yes		20.00% 2
2	No		0.00% 0
3	Don't know		80.00% 8
		answered	10
		skipped	3

Detail / comments: (2)

23. Q20: If existing powers are considered to be sufficient, is there scope for them to be used differently or more effectively?

		Response Percent	Response Total
1	The Gambling Commission needs to be better resourced, share information and provide better assistance to Local Authorities. Local assistance is all but non-existent.		
2	Targeting unlicensed operators should be a main priority. Work more collaboratively with licensed operators. Apply more rigor in evaluating the impact of regulatory intervention.		

24. Q21: What evidence is there on the potential benefits of changing the fee system to give the Gambling Commission more flexibility to adjust its fees, or potentially create financial incentives to compliance for operators?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	7
1	Unsure		
2	I don't know		
3	no comment		
4	Don't know.		
5	Yes financial incentives will be good, but there has to be some level of practical work to ensure that it is just not about adhering to conditions, but how have they promoted gambling objectives, what additional steps are they willing to take to ensure children don't start gambling at a young age.		
6	We're not aware of any evidence		
7	We cannot comment on fees charged to Gambling Commission		
		answered	7
		skipped	6



25. Q22: What are the barriers to high quality research to inform regulation or policy making, and how can these be overcome? What evidence is there that a different model to the current system might improve outcomes?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	6
1	Costs		
2	I would say the companies are financially very powerful and use the best of the best to oppose changes to regulation and policy if it negatively effects them.		
3	we are constantly frustrated by the fact that we know there is substantial harm caused to some by gambling addiction, but we cannot source any evidence which would link such harm directly to a premises (eg betting shop) and therefore we find (as local authorities) fettered in having robust policies because we cannot get evidence to back up should we wish to have a 'no more betting shops in this area' approach.		
4	The current system is complicated and as a result I believe that not all local Authority Officers and most Police Officers either do not understand their responsibilities under the Gambling Act or what the relationship is between the Gambling Commission and their respective authorities. Both the Police and		

25. Q22: What are the barriers to high quality research to inform regulation or policy making, and how can these be overcome? What evidence is there that a different model to the current system might improve outcomes?

			Response Percent	Response Total
		LGOs have enough on their plate without involving themselves in an area they do not understand or are unfamiliar with.		
5		We're not aware of any evidence		
6		sorry cannot comment.		
			answered	6
			skipped	7


26. Q23: Is there evidence from other jurisdictions or regulators on the most effective system for recouping the regulatory and societal costs of gambling from operators, for instance through taxes, licence fees or statutory levies?

			Response Percent	Response Total
1	Yes		0.00%	0
2	No		12.50%	1
3	Don't know		87.50%	7
			answered	8
			skipped	5

Detail / comments: (1)

1	09/03/2021 11:57 AM ID: 161564844	We're not aware of any evidence
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27. Q24: Is there any additional evidence in this area the government should consider?



			Response Percent	Response Total
1	Yes		0.00%	0
2	No		0.00%	0
3	Don't know		100.00%	8
			answered	8
			skipped	5

Detail / comments: (1)

1	09/03/2021 11:57 AM ID: 161564844	We're not aware of any evidence
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6. Call for Evidence Questions - Consumer Redress



28. Q25: Is there evidence of a need to change redress arrangements in the gambling sector?

			Response Percent	Response Total
1	Yes		0.00%	0
2	No		11.11%	1
3	Don't know		88.89%	8
			answered	9
			skipped	4

Detail / comments: (2)

1	There is no evidence to suggest that existing arrangements do not work effectively.		
2	Sorry we do not get involved in redress?		


29. Q26: If so, are there redress arrangements in other sectors or internationally which could provide a suitable model for the gambling sector?

			Response Percent	Response Total
1	Yes		12.50%	1
2	No		0.00%	0
3	Don't know		87.50%	7
			answered	8
			skipped	5

Detail / comments: (1)

1	To many Gambling bases locate outside UK - Governed by different rules and regulations but on offer to UK		
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30. Q27: Individual redress is often equated with financial compensation for gambling losses. However, there may be risks associated with providing financial lump sums to problem and recovering gamblers, or risks of creating a sense that gambling can be "risk free". Are there other such considerations the government should weigh in considering possible changes to redress arrangements?

			Response Percent	Response Total
1	Yes		0.00%	0
2	No		0.00%	0
3	Don't know		100.00%	8
			answered	8
			skipped	5

31. Q28: Is there any additional evidence in this area the government should consider?

			Response Percent	Response Total
1	Yes		0.00%	0
2	No		0.00%	0
3	Don't know		100.00%	8
			answered	8
			skipped	5

7. Call for Evidence Questions - Age limits and verification



32. Q29: What evidence is there on the effectiveness of current measures to prevent illegal underage gambling in land based venues and online?

			Response Percent	Response Total
1	Open-Ended Question		100.00%	10
1	Only signage - We check on inspections but not sure if measures in place can prevent. Possibly more checks needed			
2	Where there is a will here is a way. Youths do congregate at times in and around some gambling premises and cause issues, partly down to the ineffective management of the venue concerned: allowing the problem to develop; relying on police to deal with it; lack of security etc,			
3	The test purchasing exercises run by the big high street betting venues seem to be highly effective.			
4	betting shops etc have good measures in place and are visited by enforcement officers for routine checks. cannot answer re online but suspect it is a very different picture			
5	Don't know			
6	currently I think there are measures in place, however a lot of the time when visiting premises there has been 1 or 2 persons working behind the counter and they could be distracted easily whilst a underage child could possibly come in and start gambling, it may be useful in introducing a membership swipe card entrance.			
7	Locally we have performed test purchasing Not received any complaints			
8	Evidence of age-related testing shows that bookmakers consistently out-perform other age-related sales industries (eg. alcohol, cigarettes, lottery) in relation to Age Verification.			
9	We do not have access to the evidence. We believe that from the operators we have seen they have sufficient control measures in place.			
10	<p>Trading Standards have advised that we have no local evidence to show the effectiveness of current measures in preventing underage gambling in both land-based venues and online. However, a lack of evidence should not be interpreted as an indication that the current measures are sufficient, in fact our view is that there should be tighter controls in place to prevent underage gambling in the UK.</p> <p>As a welcomed measure, we are aware that the age limit to play the national lottery has recently been increased from 16 to 18, although more is still needed from the Commission given the terms of reference attached to this review state that there are approximately 55,000 individuals between 11-16 years of age classified as problem gamblers. As a startling figure, this data alone demonstrates that further measures should be implemented across both sectors.</p> <p>In addition to tighter controls, the gambling sector must take further responsibility for preventing opportunities for children to gamble. This is evident following the test purchases undertaken by the Gambling Commission in 2018 (sample pubs in England), which showed almost 90% failing to prevent children from accessing machines (Category C- 18 years plus).</p>			

32. Q29: What evidence is there on the effectiveness of current measures to prevent illegal underage gambling in land based venues and online?

	Response Percent	Response Total
	answered	10
	skipped	3

33. Q30: Is there evidence of best practice, for instance from other jurisdictions, in how to prevent illegal underage gambling?

	Response Percent	Response Total
1	Yes	 12.50%
2	No	0.00%
3	Don't know	 87.50%
	answered	8
	skipped	5

Detail / comments: (1)

1	09/03/2021 11:57 AM ID: 161564844	Test purchasing operations
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34. Q31: What, if any, evidence is there on the number of 16 and 17 year olds participating in society lotteries?

	Response Percent	Response Total
1	Open-Ended Question	100.00%
1	None	
2	Unsure	
3	not known	
4	there is no evidence, but the question is how much enforcement is taking place to ensure 16/17 year olds are not participating in society lotteries?	
5	We're not aware of any evidence	
6	We do not have access to the evidence.	
7	We have no local evidence to suggest that 16-17-year olds are participating in small society lotteries. However, this should not be interpreted that this age range are not participating in this form or gambling. Our recommendation is that all gambling activity including lotteries should be restricted to 18 years and over.	
	answered	7
	skipped	6

35. Q32: What, if any, evidence is there to show an association between legal youth engagement in society lotteries and problem gambling (as children or adults)?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	5
	1 None		
	2 Unsure		
	3 not known		
	4 We're not aware of any evidence		
	5 We do not have access to the evidence.		
		answered	5
		skipped	8

36. Q33: Is there comparative evidence to support society lotteries and the National Lottery having different minimum ages to play?

		Response Percent	Response Total
1	Yes	0.00%	0
2	No	12.50%	1
3	Don't know	87.50%	7
		answered	8
		skipped	5



37. Q34: What are the advantages and disadvantages of category D slot machine style gaming machines being legally accessible to children?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	7
	1 Makes sense - Kids need to have fun. Amusement (FGC) arcades if Governed by parents correctly cause very little harm in my opinion.		
	2 I don't know.		
	3 no comment		
	4 Any gaming machine that provides either a cash or prize pay-out in excess of the amount of stake will tend to promote gambling. No person under the age of 18 should be able to use these machines unless in the company of a responsible adult.		
	5 It will make it more appealing for young people to start gambling at a young age. I am not sure what evidence we would have, but this may lead to CSE, where children start gambling early, they fall in to debt start looking at help from unknown people.		
	6 Advantages are they are entertaining and fun to play Potential for teaching responsible gambling Disadvantages - can attract children to chase their losses		

37. Q34: What are the advantages and disadvantages of category D slot machine style gaming machines being legally accessible to children?

		Response Percent	Response Total
7	Could encourage addictive gambling from an early age and make parents spend money that they do not have. Traditionally for example it is hard to win a soft toy from a crane machine and parents have to spend quite a bit of money to 'win' one. Children could also start spending all their pocket money especially if they are allowed to visit local arcades on their own without parents.		
		answered	7
		skipped	6

38. Q35: Is there evidence on how the characteristics of category D slot machine style gaming machines (for instance whether they pay out in cash or tickets) factor into their association with harm in childhood or later life?

		Response Percent	Response Total
1	Yes		25.00%
2	No		0.00%
3	Don't know		75.00%
		answered	8
		skipped	5

Detail / comments: (3)

1	Where do the adult gamblers come from?
2	We're not aware of any evidence
3	see above.

39. Q36: What, if any, is the evidence that extra protections are needed for the youngest adults (for instance those aged between 18 and 25)?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	7
1	None		
2	Extra protection & education of gambling issues is key to any young person.		
3	not known		
4	Currently children between 18-25 where they go in to further education with university, they fall straight in to debt, they need to be protected as a lot might not be able to afford expenses, rent, pay for student loans nad may find this attractive to see if they could gamble to make some money to pay off loans.		
5	We're not aware of any evidence		
6	Evidence at William Hill indicates that any increased risk for young adults is suitably managed.		
7	Hard to comment on this, I think the answers need to come from the NHS or Gambling Charities.		
		answered	7
		skipped	6

40. Q37: What evidence is there on the type of protections which might be most effective for this age group?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	5
1	None		
2	Unsure.		
3	not known		
4	We're not aware of any evidence		
5	Hard to comment on this, I think the answers need to come from the NHS or Gambling Charities.		
		answered	5
		skipped	8

41. Q38: Is there any additional evidence in this area the government should consider?

		Response Percent	Response Total
1	Yes	0.00%	0
2	No	0.00%	0
3	Don't know	100.00%	7
		answered	7
		skipped	6

Detail / comments: (1)

1	As stated in Q10 there should be a public health approach in relation to gambling. In our view it is essential that recommendations from public health experts are taken into consideration when amending gambling regulation and policy. As stated in Q5, local data would allow authorities to target any areas where there appears to be gambling related harm and look at the social demographic data of child problem gamblers - such as sex, BAME and children from a lower sociodemographic background. This data if available would assist authorities in providing the necessary support by the most appropriate method.
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8. Call for Evidence Questions - Land based gambling

42. Q39: What, if any, changes in the rules on land based gambling would support the government's objectives as set out in the document? Please provide evidence to support this position, for instance how changes have worked in other countries.

		Response Percent	Response Total
1	Open-Ended Question	100.00%	8
1	Unsure		
2	I don't have specific evidence		
3	make it easier for local authorities to have policies which don't have to rely on localised evidence but instead acknowledge the general problem nationally		




42. Q39: What, if any, changes in the rules on land based gambling would support the government's objectives as set out in the document? Please provide evidence to support this position, for instance how changes have worked in other countries.

		Response Percent	Response Total
4	I am from Western Australia where I was a Police Officer for 39 years. For part of that time I was a Liquor and Gaming Branch Officer. In WA there is only one casino, located in Perth. Gambling permits can be obtained to run gaming nights but no gaming machines are permitted outside of the casino. 2-up is permitted by Regulations in Kalgoorlie or by a permit. The proliferation of gaming machines in the UK, especially permitting their use in alcohol licensed premises, is of particular concern.		
5	We're not aware of any evidence		
6	William Hill believe there is an opportunity to update legislation in this area, particularly regarding improved use of technology. William Hill propose LBOs be given the ability to provide devices for customers to access online accounts while in shop as well as the use of multi-functional machines used for gaming or self-service sports betting. William Hill advocate the use of facial recognition technology in all LBOs as a tool to assist safer gambling and request Government support to review relevant legislation so that this can be brought in.		
7	sorry we do not have access to this finromation		
8	Please see below Q43.		
		answered	8
		skipped	5

43. Q40: What evidence is there on potential benefits or harms of permitting cashless payment for land based gambling?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	8
1	Unsure - But makes it easier to get into Debt.		
2	don't have specific evidence		
3	not known		
4	That cashless payments again lead to consumers potentially not appreciating that they are using 'real money'.		
5	Cashless payments should be capped with no access to credit card facilities.		
6	We're not aware of any evidence		
7	All payment options should be made available for betting shop customers (with the exclusion of credit cards), as would be found in other High Street outlets.		
8	sorry we do not have access to this information		
		answered	8
		skipped	5

44. Q41: Is there evidence that changes to machine allocations and/ or machine to table ratios in casinos to allow them to have more machines would support the government's objectives?

			Response Percent	Response Total
1	Yes		12.50%	1
2	No		25.00%	2
3	Don't know		62.50%	5
			answered	8
			skipped	5




Detail / comments: (1)

1	More machines mean more people spending money all at the same time.
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45. Q42: What is the evidence that the new types of casino created by the 2005 Act meet (or could meet) their objectives for the sector; supporting economic regeneration, tourism and growth while reducing risks of harm?

			Response Percent	Response Total
1	Open-Ended Question		100.00%	4
1	Same strict rules - Casino's are self Governing and appear to want ensure no negative press.			
2	not known			
3	We're not aware of any evidence, we imagine that they could support the local economy and assist with local job offer, and help to raise aspirations/prestige within a location. A casino would attract a different kind of market			
4	Cannot comment as we have no casinos so my experience is non existent.			
			answered	4
			skipped	9

46. Q43: Is there evidence on whether licensing and local authorities have enough powers to fulfil their responsibilities in respect of premises licenses?

			Response Percent	Response Total
1	Yes		40.00%	4
2	No		20.00%	2
3	Don't know		40.00%	4
			answered	10
			skipped	3



Detail / comments: (5)

1	I find that Local Authorities don't feel they have the power or support to combat issues they identify and face pressure from the legal framework when facing big business.
2	There is no evidence that LA's are able to fulfil their responsibilities and have the right powers.
3	We're not aware of any evidence, we've never had to take anyone to review. Our local gambling operators do police themselves well in this area.

46. Q43: Is there evidence on whether licensing and local authorities have enough powers to fulfil their responsibilities in respect of premises licenses?

		Response Percent	Response Total
4	<p>Licensing Authorities already have powers to ensure they only grant premises licences to responsible operators. They are also able to add conditions to licences, where they deem them to be required, and they have ultimate power to review, and if necessary revoke any licences that are not operated responsibly.</p> <p>Local Authorities also have planning regulation, which can control the number of gambling premises in a location.</p> <p>As a national operator, William Hill are aware of the divergence of some Local Authority policies, making compliance with each more difficult for a nationally represented operator. It is suggested that policies should be brought back into a more standard template.</p>		
5	<p>Our view is that the current legislation does not allow licensing authorities to fulfil their responsibilities in respect of determining premises licence applications. Licensing authorities are often presented with new premises licence applications and have no option but to grant an application, even though the opinion maybe that any further applications in a particular area would increase gambling harm. It is almost impossible to challenge an application without a link between a premises and evidence of harm. If the below recommendations were incorporated into regulation this would assist responsible authorities and other persons to make representations on evidence and allow local authorities to use the power it has been delegated to determine applications in the correct manner.</p> <p>1) Public Health to become a licensing objective and for public health experts to be a responsible authority. It is vital that the health impacts of gambling are recognised in regulation. In our view there should be a public health approach for all gambling activities - Public health must be a consideration when determining applications and public health experts are best placed to comment on any application. With Public Health as a responsible authority for alcohol licensing, it seems inconsistent to not also have this within gambling regulation.</p> <p>2). Local data required (as stated in Q5) Local or regional data would also allow authorities to target any areas where there appears to be gambling related harm and look at the social demographic data of problem gamblers such as sex, age, BAME and people from lower sociodemographic backgrounds. This data will help target the support required by the most appropriate method. Additionally, local data will allow an evidence-based reason to attach relevant conditions to licences to promote the gambling objectives.</p> <p>With limited local data available on where there are areas of gambling harm it is difficult for responsible authorities or other parties to make representations to applications based on evidence. As a result, either representations are not submitted, and the application is automatically granted, or the licensing authority does not have the necessary evidence to challenge and take the most appropriate action.</p> <p>3) Cumulative Impact Policies (CIPs) CIPs are permitted within the Licensing Act 2003 for alcohol licensed premises and the same should be considered for the gambling regime. If an area suffers from an over concentration of gambling premises which is having a detrimental impact on the local area and one of more of the objectives, local authorities could designate areas as saturated. As a result, this would put the onus on the applicant to ensure that any new/variation to an application would not cause further harm.</p>		




47. Q44: Is there evidence that we should moderately increase the threshold at which local authorities need to individually authorise the number of category D and C gaming machines in alcohol licensed premises?

			Response Percent	Response Total
1	Yes		0.00%	0
2	No		25.00%	2
3	Don't know		75.00%	6
			answered	8
			skipped	5
Detail / comments: (4)				
1	So pubs are requesting the addition of extra machines - But many report lack of use. Varies greatly from premises to premises			

47. Q44: Is there evidence that we should moderately increase the threshold at which local authorities need to individually authorise the number of category D and C gaming machines in alcohol licensed premises?

		Response Percent	Response Total
2	There should be no machines in alcohol licensed premises.		
3	We're not aware of any evidence, we don't believe that an alcohol licensed premise should be able to increase the number of gaming machines currently allowed		
4	We have no evidence to support this.		

48. Q45: Is there any additional evidence in this area the government should consider?

			Response Percent	Response Total
1	Yes		11.11%	1
2	No		11.11%	1
3	Don't know		77.78%	7
			answered	9
			skipped	4

Detail / comments: (1)

1	<p>William Hill believe all gaming machines should conform to standard safer-gambling standards, regardless of the type of premises in which they are situated. This is not the case at present.</p> <p>William Hill believe LBOs would be a suitable environment in which to sell National Lottery products.</p> <p>William Hill propose betting shops should be classified as part of the retail sector, to avoid any confusion in the future.</p> <p>William Hill also seek clarification on the sale of food and non-alcoholic beverages within an LBO.</p>
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