



Gambling Related Harm APPG

Mr Michael Dugher
Chief Executive
Betting and Gaming Council
25 Buckingham Palace Rd
London
SW1W 0PP

3 April 2020

Dear Michael,

Protecting Online Gamblers During the Covid-19 Pandemic

The Gambling Related Harm All Party Parliamentary Group welcomed the announcement by the Betting and Gaming Council (BGC) this week that it is seeking to set the standards expected of members during the Covid -19 Pandemic. It will not come as a surprise to you, however, that we do not think that the standards you have proposed go anything like far enough. As we set out below, most measures are loosely worded, do not make firm commitments or merely restate existing obligations. Instead, we would expect you to adopt standards that respond appropriately to the context we are in and which will help to protect gamblers at this critical time.

People are at home and are severely restricted with access to mini casinos on their laptops or mobile phones. As the Gambling Commission and you have identified, this period of isolation has real potential to encourage at risk and problematic gamblers and entice those who may be more vulnerable to gamble. As we have been saying for a number of weeks it is urgent that stringent protective measures are put in place.

Your pledges

We therefore have deep concerns about the 'pledges' which have been proposed this week by the BGC; these fall well-short of what is required. All are very weak, a number need further explanation and others are obligations already set out within the existing Licence Conditions and Codes of Practice (LCCPs). We comment on each of your pledges in turn below:

1. Increase safer gambling messages across all sites and direct to all customers – **Please could you explain how this will be measured, what the increase will be and what constitutes a safer gambling message?**
2. Step up interventions if customers increase time and spend beyond normal pre-crisis patterns – **It is essential to know what the threshold is for interventions, what is the % increase on normal time and spend that would lead to an intervention?**



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3. Actively promote deposit limits – **As we set out last week, deposit limits should be made mandatory and immediately implemented.**
4. Action to ensure appropriate and responsible advertising including monitoring volume – **It is our understanding that the first part of this, appropriate and responsible advertising, is in fact already in the LCCPs. On the second part, will your members commit to reducing advertising during the Covid-19 pandemic?**
5. Report all illegal and rogue advertising from black market online operators – **It is our understanding that this is already under the remit of the Gambling Commission. This would also, of course, be in your members' interests.**
6. One strike and you're out policy where affiliates breach pledges – **Again operators would already be liable for affiliate marketing under the LCCPs.**
7. Signpost help to GAMCARE and the National Gambling Helpline and Gam Stop for self-exclusion – **Again this is already contained within the LCCPs.**
8. Commitment to ensuring funding for Research Education and Treatment - **Again this is already contained within the LCCPs.**
9. Welfare checks and well-being help for staff – **We strongly support this but would ask what this pledge constitutes.**
10. Supporting the Government's 'National Effort' with volunteers and facilities – **We strongly support this but would ask what this pledge constitutes.**

Urgent Measures Required

Given that these pledges do not go anywhere near far enough, we would ask that you urgently review your proposals and include the following as a matter of urgency to protect gamblers and vulnerable people and their families at this time. We are also asking operators to adopt these measures as a minimum requirement in addition to taking further steps:

1. Commit to implement deposit limits for the duration of the crisis
2. Implement a £2 stake per spin limit on slot content online to reduce the harm that this highly dangerous content can have
3. End VIP accounts which encourage high levels of expenditure
4. End gambling advertising and sign up offers for bonuses
5. Companies should make their data available to ensure independent research can be undertaken to assess the scale of harm being caused by the industry at this time and the need for further harm prevention measures



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We strongly recommend that your members adopt these five measures, in addition to taking further steps, as a matter of urgency. At this time, it is incumbent on us all to do everything we can to support people's safety and wellbeing, to support our society, protect the vulnerable and to put public interest ahead of gambling companies profit.

We are copying this letter to the five major gambling companies in the UK.

Yours sincerely,

Carolyn Harris MP

Rt. Hon. Sir Iain Duncan Smith MP

Ronnie Cowan MP

Fiona Bruce MP

Tracey Crouch MP

Judith Cummins MP

Baroness Eaton

Lord Foster of Bath

Patricia Gibson MP

Peter Gibson MP

Richard Holden MP

David Linden MP

Tim Loughton MP

Stuart McDonald MP

Robin Millar MP

Jessica Morden MP

Gerald Jones MP,

Andrew Selous MP

Jim Shannon MP



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Jo Stevens MP

James Sunderland MP

Sir Desmond Swayne MP

Nick Thomas – Symonds MP

Sammy Wilson MP

Prof Henrietta Bowden-Jones OBE, Director of the National Problem Gambling Clinic