



Gambling Related Harm APPG

Gambling Related Harm APPG Minutes

Date: Wednesday 11th November 2020

Time: 2:30pm

Location: Virtual

Chair: Carolyn Harris MP

Minutes taken by: Chloe Sercombe, Interel Consulting UK

Members Present

- Carolyn Harris MP
- The Rt Hon. Sir Ian Duncan Smith MP
- Ronnie Cowan MP
- Gerald Jones MP
- Margaret Ferrier MP
- Sir Mark Hendrick MP

External Guests

- Dr Heather Wardle – London School of Hygiene & Tropical Science
- Dr Henrietta Bowden Jones – National Gambling Clinic
- Andrew Taylor – Advertising Standards Authority
- Kam Atwal – Advertising Standards Authority
- Neil McArthur – Gambling Commission
- Matthew Hinckley – Gordon Moody Association
- Liz Ritchie – Gambling with Lives
- Katherine Morgan – Interel Consulting UK
- Holly Ramsey – Interel Consulting UK
- Chloe Sercombe – Interel Consulting UK

Minutes of the Meeting – 2:30pm – 3:30pm

CAROLYN HARRIS MP started the meeting and welcomed all the guests. She said that lockdown is something that has been on a lot of people's minds over the last few months, including hers. She said she would start with the academics, move onto the Advertising Standards Agency, then the Gordon Moody Association and then the Gambling Commission. She asked **HEATHER WARDLE** to speak first.

HEATHER WARDLE began by sharing some slides to look at the actual data about what we know happened during lockdown on gambling behaviour. She said these figures still need to be peer reviewed but that they will help us to think through some issues. She said what they were interested in was what would happen during lockdown to gambling behaviour, particularly with sports bettors once betting was taken away.

HEATHER WARDLE referenced one of her slides and said this is a map of all the different types of behaviour movements they think might have happened. She spoke about the middle pathway saying for regular sports bettors under lockdown conditions they could either stop gambling – and we could support them to maintain that behaviour going forward - or there could be people who are regular sports bettors who decide to take up some other form of potentially riskier gambling activity..

HEATHER WARDLE said from a survey of 3856 regular sports bettors, around 1/3 of both men and women completely stopped all gambling during the initial lockdown. So there were people who said "right my sports aren't available, that's it I'm not doing anything else" but there were also 17% of male and female sports bettors who then switched to a new form of gambling. This was gambling that they hadn't undertaken prior to lockdown, so when sports went away, they decided to engage in this instead. Though there is no uniform distribution, we can see that the



Gambling Related Harm APPG

likelihood or propensity of experiencing gambling problems increases the likelihood of you being in that group who switched gambling activity during lockdown.

HEATHER WARDLE referenced said that 50% of problem gamblers in the three month period during lockdown switched to a new form of gambling. This makes them a very vulnerable group. She said that other things they wanted to look at were how problem gambling was related to the experiences during lockdown – so, for both men and women, if there were increased financial difficulties, or if they had been sent a letter by the government advising them to shield – they would be more likely to be a problem gambler during lockdown. Amongst men, increased conflict with others during lockdown or switched gambling activity meant an individual was more likely to be a problem gambler. For women, it was about increased frequency of gambling.

HEATHER WARDLE said that the implications are that those who switched activity during lockdown should be considered a group vulnerable to harms, especially regular male sports bettors, and should be a target for harm prevention measures. The Gambling Commission should be thinking about this through their customer interaction policies, and that regulation in the industry needs to take account of this. There should also be given to the third of people who stopped gambling and how we support and sustain those positive behaviour changes as sports come back.

CAROLYN HARRIS MP thanked **HEATHER WARDLE** and invited **HENRIETTA BOWDEN-JONES** to speak.

HENRIETTA BOWDEN-JONES said she fully agreed with what has been said already and that she brings a more personal experience, dealing with pathological gamblers at the National Problem Gambling Clinic. She said during lockdown only a small group of them remained, the others were redeployed to the frontline so they stopped all non-essential services and focused on key working to ensure safety. She said it was a difficult time for the people remaining because there was no downtime and the work was intense.

HENRIETTA BOWDEN-JONES said during lockdown some patients found it helpful as it helped them to maintain abstinence or decrease their gambling - things such as bookmakers being closed played a role. The second one was family members being around as people felt they had more structure to their day despite the lockdown, and also less freedom or time to disappear for long periods. It was also harder to be on the Internet for long periods of time and without sports on TV - there were a lot of changes that helped many better control their gambling urges. However, she said that there were several worried everyday about the day when the bookmakers would open again - so there was anticipatory anxiety. She said a few of them reported that the closure of bookmakers had caused them to start gambling online.

HENRIETTA BOWDEN-JONES said that the issue of availability is a big one. She said that some people spoke of a first experience of a sense of peace because they were unable to gamble on their preferential mode and they enjoyed lockdown. However, many others were very suicidal, very isolated, very alone, and very scared. One of the reasons for this is that the mental health services were struggling because they were not able to see people so she said they ended up carrying a significant psychiatric burden of people who should have really been seen by mental health services.

HENRIETTA BOWDEN-JONES said that her team observed a large proportion of patients returned to previous levels of gambling once lockdown had lifted. She also said that there was a false sense of security during lockdown and people didn't make full use of their stimulus control – people were removing self-exclusion blocks feeling that they could because they weren't going to be tempted and then the minute lockdown ended it was problematic for many. Isolation, anxiety, suicidal thoughts, and financial worries were possible triggers for relapses.

HENRIETTA BOWDEN-JONES said when she did a questionnaire on gambling adverts, many of her patients said that the frequency and quantity of these adverts was perceived to be worse potentially because there were no other distractions. Lastly, some people ended up gambling offshore because they were self-excluded, so they acknowledge that the self-exclusion stopped them but they found ways around that. She said she would like to talk about the stopping of adverts at some point.

CAROLYN HARRIS MP said asked both **HEATHER WARDLE** and **HENRIETTA BOWDEN-JONES** if in their professional opinion, either the Gambling Commission or the Advertising Standards Agency did the right thing in lockdown and whether the systems that were put in place were appropriate.



Gambling Related Harm APPG

HEATHER WARDLE said that we are in unique times and that this is not a business as usual situation, with a renewed emphasis on greater responsibility. We have been doing qualitative work with our regular sports bettors, and some of them have stopped betting and it's been a really good break for them. Equally, there are also people who have said that they have been heavily influenced by the marketing in particular, not just advertising. They said that the actual marketing that they have been receiving from companies found that to be triggers for them and their altered circumstances made them more vulnerable. She said that they are more socially isolated, more stress and more mental health problems.

HEATHER WARDLE said she was struggling to see how when we don't know the details of people's lives and their circumstances how marketing in the usual manner can continue to be safe and responsible. She said we need to have something that is much more precautionary and protective of people due to the difference in current circumstances.

HENRIETTA BOWDEN-JONES agreed. She said that during lockdown the gambling adverts that everyone was talking about were only one small part of the picture. Twitter is promoting gambling in all sorts of ways and young people are able to see these messages about gambling - it is a big issue online. She said that some of her patients were still getting emails promoting gambling during lockdown and that she believes there should be a national strategy around critical moments such as this when people are lacking in structure and financial wellbeing.

HENRIETTA BOWDEN-JONES also said we could consider doing something more drastic in relation to promotional messages and adverts. She said that affordability was a big issue because sometimes people were turning to gambling to try and sort out their financial anxieties. She also said that the Gambling Commission could introduce a nationwide self-exclusion for lifetime, 5 years or 1 year on all bookmakers.

CAROLYN HARRIS MP asked if any other Parliamentarians would like to ask a question.

MARGARET FERRIER MP said that there's going to be more people who have turned to online gambling during this time because they're stuck inside and venues are closed. She asked if there has been more risks in online gambling compared to someone going to a bookmakers or attending a casino?

HEATHER WARDLE said that she definitely saw movements from their regular sports bettors moving from betting on sports to moving into casino and slot style products - and that these are more risky types of products. She said she also saw women move into avirtual races and bingo - this is something she would be exploring more in her data.

MARGARET FERRIER MP asked **HEATHER WARDLE** if once people have moved over to online if they will go back or continue with both types of activity?

HEATHER WARDLE said that this what she is aiming to find out. She said they are just about to launch their next wave of survey collection tomorrow where they're going back to the same people to finding out what they've done in the past three months. She said they would go back to them in three month's time again so that they can track their behaviour for this full year period to see if their transitions are temporary or if they stick to online gambling.

HENRIETTA BOWDEN-JONES said that she had found very similar things to the results we have just shown and that she will share the data with the APPG at a later time. She said it was clear that people turning to casino style games is worrying and that in some cases people simultaneously gambling on separate screens. She said she saw an increase in frequency of play and days played in the people who had not stopped gambling altogether and this all comes down to clear affordability checks. She said that she had several patients telling her that they got into more debt because they were gambling on their overdraft.

HENRIETTA BOWDEN-JONES said that she hoped that this had stopped a while ago and was upset to hear that gambling in your overdraft was still possible. She questioned the point of having some banks allow self-exclusion from gambling while others were still making profits on purpose.

CAROLYN HARRIS MP said that none of the banks actually stopped anyone gambling in their overdraft and that this is one of the things they have asked for in their report. She said that a big thing that the banks have done which she has really appreciated are the gambling blocks and agreed that it was a big issue for her.

CAROLYN HARRIS MP invited the Advertising Standards Authority to give evidence.



Gambling Related Harm APPG

ANDREW TAYLOR said that they would present on what happened in terms of advertising exposure on television and online. He said that from the start of lockdown, the ASA issued a warning to the industry and asked them to take responsibility to ensure that advertisers didn't play off the fear of lockdown and boredom. He said that the ASA have not found any examples of that in terms of their data but that gambling advertising continues to be a controversial issue.

ANDREW TAYLOR said that they receive around 5200 complaints a month and that this hasn't really varied during lockdown. He said that they have seen a general concern from people who have reasonable objections about the presence and visibility of gambling advertising and misleading offers and promotions. He said they don't see a massive amount of concern around advertising to children because there is very little of it and we have very strict targeting rules in place across all media. He said that they have detailed guidance on what is required by advertisers to ensure that they are targeting adults and not children.

ANDREW TAYLOR said that they have published a consultation in the past few weeks on strengthening their rules around the protection of children and also around the types of content which appeal to vulnerable individuals and that this responds to GambleAware's work.

CAROLYN HARRIS MP said that **ANDREW TAYLOR** mentioned that gambling was not targeted at children - but asked if he would accept that they are shown at a time when it's highly likely that children will see it?

ANDREW TAYLOR said that they have rules on targeting which is designed to reduce children's exposure to direct targeting using mechanisms on Facebook, Google and similar. He said that gambling is a legally available product and is legally permissible to promote it across a range of media. He said that they have a restriction that requires that children are not a significant part of the audience, so that these adverts only go out in adult orientated spaces. Secondly, they have an array of content restriction which is designed to reduce the potential for undue impact.

CAROLYN HARRIS MP asked if he would defend online bingo adverts on daytime TV?

ANDREW TAYLOR said that bingo is permitted on television under an industry voluntary arrangement. He thought that online bingo would fall under something else.

CAROLYN HARRIS MP thanked **ANDREW TAYLOR** and asked **KAM ATWAL** to speak.

KAM ATWAL said that they had recently published a piece of analysis looking at exposure to TV advertising during the public health crisis and the first seven weeks of lockdown. She said that this was a topical piece compiled as part of a number of articles they published looking at trends during lockdown. She said that the piece aimed to provide an in depth picture of the diverse nature of TV advertising and they wanted to illustrate the changes observed across the different advertising sectors.

KAM ATWAL said that their analysis found that during the seven weeks between the 16th of March and the 3rd of May, television viewing rose significantly compared with the previous viewing by 20%. She said that they found that most of the sector level trends were intuitive given the restrictions of lockdown. For example, the decline in exposure to travel ads, cinema release, sectors for which advertising during lockdown would be redundant given the fact you can't go on holiday or go to the cinema. There was also an increase in exposure to public health and government ads as well as brand building ads.

KAM ATWAL said that in the seven-week period of lockdown they saw that exposure to gambling ads rose from 15.3 ads per week in 2019 to 22.3 ads per week for all adults and from 2.7 ads a week to 4 ads a week for children aged 4 to 15. This increase was driven by an increase in exposure to bingo and lottery scratch card advertising.

CAROLYN HARRIS MP asked if anyone had any questions.

GERALD JONES MP asked what sort of regulatory activity they were putting into place for this period of lockdown and what their experiences were of the period – including what more could be done to help?

KAM ATWAL said that they haven't looked at any more recent data in terms of exposure data as it takes a long time to compile this type of analysis. She said that more recent data suggests that children's viewing has dropped significantly from the weeks we looked at during the summer, and the summer holidays combined with the return to school has meant that we've not seen the same level of increase in viewing as we did in the first lockdown.



Gambling Related Harm APPG

CAROLYN HARRIS MP thanked the Advertising Standards Authority. She then moved to **MATTHEW HINCKLEY** from the Gordon Moody Association.

MATTHEW HINCKLEY said that Gordon Moody is the residential treatment provider in the UK for those most affected by gambling addictions – so the people they treat are the most addicted to gambling you could possibly be. He said they come to them when they are most in crisis and that they have been operating now for 50 years. They have two sites, one in the Midlands and one in South London.

MATTHEW HINCKLEY said that the number of applications they were seeing come into the organisation in the first lockdown dropped dramatically and almost stopped overnight. He said that he thinks that relates to what **HEATHER WARDLE** said about people regressing back into themselves and carrying on with their gambling. However, at the same time people who had been through their treatment services meant that outreach services increased dramatically from around 30 interactions a month to 250 a week. He said that we are now 6 months down the line and that those in recovery were really concerned about relapse due to the uncertainty of lockdown.

MATTHEW HINCKLEY said that they created additional support for those wanting to come into treatment that were on their waiting list. He also said that there was an increase in family and friends services which now runs twice a week with around 9 people attending each session. He said that in terms of the number of applications since lockdown eased, they have increased by 40%. They are seeing a strong increase in applications from those under 34, which has risen by 59%. He also said that the majority of people applying were white, so people from the BAME community don't seem to be applying. He said that this might be due to an awareness side of things than anything else.

MATTHEW HINCKLEY said that since lockdown has eased, the severity of the interactions they are having with people has increased dramatically, with very complex themes. He said that there was more suicidality, a lot more women reaching out and a lot more people in absolute crisis. He said that this is happening on an international level.

MATTHEW HINCKLEY said that in normal times they would receive around 6 to 8 applications a month whereas now they received 8 applications on a Saturday – when previously they would have never heard from anyone on a Saturday. He said that people were coming to them with an increased level of mental health issues and frustration due to the fact that many other support services out there are overrun and lacking resources.

MATTHEW HINCKLEY said that they had seen a drop in engagement rates from those aged 18-25 but of those who have reached out, they are coming to them with an increased level of complexity of issues, particularly around drug abuse. He said that they have had to develop a few partnerships and relationships with other organisations during this time to help support people. He said that lockdown 2.0 was quite possibly the most difficult week the organisation has ever had both in terms of preparing for lockdown and staff's mental health but also the impact of people regressing rather quickly as we went back into lockdown.

MATTHEW HINCKLEY gave an example of a man who had been through his service and was no longer gambling and was in the recovery phase but had turned to alcohol at the beginning of lockdown. He said that he called them on Tuesday of this last week in real crisis and ready to commit suicide. **MATTHEW HINCKLEY** said that they had to work really hard with him and the other services in the area to provide him with the support necessary.

MATTHEW HINCKLEY said that he was fearful of the impact on his organisation from lockdown and that they are going to be overrun with people who are severely addicted to gambling.

CAROLYN HARRIS MP said that one of the first things the APPG asked for right at the beginning of the first lockdown was a cap on stakes so people couldn't have got into the financial situation that a lot of people are in now. She said that she knows this would not stop gambling, but that if you weren't able to spend the amount of money people were able to spend, if **MATTHEW HINCKLEY** thought it was wrong for operators not to have capped stakes when they had the opportunity to do so?

MATTHEW HINCKLEY said that for the people he treats, they would have found a way around it - maybe by going onto the black market. He said that for the majority of people who were on the cusp of being a gambler or moving into being a problem gambler, it would have been beneficial but for those who they treat it would not have made a difference.



Gambling Related Harm APPG

CAROLYN HARRIS MP asked **HENRIETTA BOWDEN-JONES** if she thought it would be beneficial to cap stakes. **HENRIETTA BOWDEN-JONES** nodded in agreement. **CAROLYN HARRIS MP** asked **HEATHER WARDLE** if there should have been a cap. **HEATHER WARDLE** nodded in agreement. **CAROLYN HARRIS MP** then asked **MATTHEW HINCKLEY** what the real consequences are for individuals in the stressful situation that has been made worse by the pandemic and whether they will always be gambling addicts.

MATTHEW HINCKLEY said that the real term impact is that if this carries on for a long time which in theory it could be, then I think we will see a lot of people who previously have dealt with their addiction relaxing a lot more and those people will move from being a problem gambler to a full-fledged gambler. He said that he thinks we will see a lot more of this and that he is really fearful that the volume of people we're going to be seeing through the NHS and other treatment services is going to be exponential.

CAROLYN HARRIS MP asked if any parliamentarians had any questions.

RONNIE COWAN MP asked if there is anything we're learning specifically from this crisis that we can put into practice once we come out of it or is it all pretty much what we expected to happen?

MATTHEW HINCKLEY said that gambling addiction is a proper addiction and that's the first thing that's going to come out of this. We also need to integrate gambling addiction across all of the services so that it is not seen in isolation and so it comes a part of the national addiction agenda.

RONNIE COWAN MP asked if he meant so that it comes into alcohol and drug addiction and asked if in doing that you lose the specific experiences and knowledge required to treat gambling.

MATTHEW HINCKLEY said that he thinks there is a difference between how you treat it versus the knowledge of it. There is a specificity to how you treat it, but in terms of awareness and linking in with the NHS services – it has to be integrated into these services so that GP's realise that gambling is an addiction and are aware of it.

RONNIE COWAN MP said that this was early interventions, so GPs can see it, identify it, and recognise it.

MATTHEW HINCKLEY said that he thinks gambling addiction is where mental health was 10 years ago and it is really starting to be known that there is an addiction out there called gambling addiction and people need support through it and need to be treated properly with the right people.

GERALD JONES MP asked how about disruptions to Gordon Moody's services and how they were planning to keep services maintained through lockdown.

MATTHEW HINCKLEY said that they had to close one of their services at the beginning of lockdown because they didn't have enough people using the service to warrant keeping it open. He said that this presented itself as an opportunity to do up the centre – they had builders in and did some work. He said that as we go into lockdown again centres are full but that they have put in place all the necessary precautions around PPE to ensure staff and residents are safe. He said that there is demand for services and they have grown in their outreach and on the digital side of things but that they would need more resorts and staff to deliver the increased demand. He said that he was worried about being able to deliver services to the level that they will be demanded in the new year.

MARGARET FERRIER MP congratulated the Gordon Moody Association on their services and asked where they got their funding from? She also asked about engagement by younger people and if he was worried about the fact that it had dropped off? She also asked if people had more suicidal thoughts during lockdown?

MATTHEW HINCKLEY said that from a suicidality point, it has grown exponentially. For example, a person left their service just before lockdown in a very strong position and able to cope with life and 7 weeks ago we get a call from him and he's on the top of a carpark ready to jump because of his mental health state. He said in terms of 18-24 year olds, there has to be a major campaign on raising awareness about services like ours using appropriate social channels. With regards to funding, he said that it is pretty much 50-50 split from Gamble Aware and the industry themselves through contributions, their CSR strategy or through regulatory settlements.

SIR MARK HENDRICK MP said that he attended a conference at the University of Central Lancashire about two years ago on gambling addiction, and there were few people from the South Asian community and said that there was a great deal of stigma and shame attached to gambling in the South Asian community compared to white English



Gambling Related Harm APPG

communities. Also, in the East Asian community, they take a different view on gambling and it is seen as good fortune, so it depends on which section of the BAME community people come from and how gambling is viewed in their cultural context.

LIZ RITCHIE apologised for being late to the meeting. She said that she wanted to let people know about a recent death during lockdown – a young NHS worker – who threw himself under a train. He had had a lot of contact in the three or four days leading up to his death from a gambling company and that Gambling with Lives are still investigating this. She said that they would be seeking an Article 2 inquest - to investigate if his right to life was not adequately protected by the state. She said that a lesson to be learnt is the suddenness of suicide – he is not somebody who had any contact with any services. She said that she thought it was a direct consequence of gambling and gambling companies.

LIZ RITCHIE also said that a consequence of this is the normalisation of gambling through advertising which means that somebody like him does not think there is any possibility of any help – they think that it's all their fault and this is described as individual responsibility. She also said that research indicates that suicide is much more highly correlated with gambling disorder than it is with other addictions, so we are enabling the targeting of young people even though we know that this is potentially a progression towards death.

HENRIETTA BOWDEN-JONES said she wanted to respond to **RONNIE COWAN MP'S** question about what has changed and what will change in lockdown. She said that data now shows that we are properly treating 40% more people now due to the expansion of digital delivery of services. She said that when we talk about 3% to 10% of people in treatment, we need to use our national network, we need to work out the threshold of who needs to be treated with an evidence based approach, and those people can be treated wherever they are in the country.

CAROLYN HARRIS MP then asked **NEIL MCARTHUR** to speak.

NEIL MCARTHUR said as soon as lockdown started, they began gathering information from consumers and demanding data from operators in order to get both the demand and supply side information. He said from his perspective it is too soon to draw firm conclusions and that what we saw during lockdown was an acceleration of trends that we were already seeing, which was an overall decline in gambling in the total population but a shift to online gambling. He said that with a shift to online, there was a shift to more intense products such as slots and this means they have to have a continued focus on higher risk groups.

NEIL MCARTHUR said that they also have to focus on understanding customers as individuals because risk is dependent on your personal financial circumstances and similar, and so they have been pushing operators very hard on this. He said that he agreed with the point being made about the importance of affordability. He said that there were three phases – in phase one everything shut down including sport so the only way to gamble was online. As lockdown started to ease premises began to open but then there were also further lockdowns on local and national levels so there has been an overall decrease in play. However, he said that there were some people who started gambling for the first time and it is important to recognise that but it was offset in overall population terms by the number of people who stopped gambling completely.

NEIL MCARTHUR said that what they found from their research was that people who had gambled in the last four weeks tried different things and that the most engaged gamblers, the people who are most at risk of becoming problem gamblers, were the ones who increased their trial of new products the most. He said that this raises a risk flag and that they identified two high risk groups. The first was people under 24 and the other is people who are already engaged gamblers and are now downloading three or more different ways to gamble.

NEIL MCARTHUR said that they also knew that in the initial lockdown phase, demand for services plummeted, like the services Gordon Moody Association offers, but also helpline calls dropped. He said that they were concerned about this, so they issued a warning to operators that they needed to be careful about how they are managing their customers and that business as usual would not work. He said that they directed £9,000,000 to go to Gamble Aware to make sure that treatment provision would be sustained. They also got in touch with overseas regulators to see what lessons they could learn from Spain or Italy as they were further along the journey. He said they introduced new guidelines to change license conditions and codes of practice without consultation in order to keep playing under control and conduct effective affordability checks.



Gambling Related Harm APPG

NEIL MCARTHUR said that they banned bonus offers to customers who were identified as being at risk of harm and the use of reverse withdrawal because they knew that that's one of the risk behaviours. As we came out of lockdown, he said they had seen online real event betting, so betting on sports bounced back and increased so there was a sense of pent-up demand being released. He said they also saw online slot sessions decrease very slightly. He said as a result of the actions they had taken, the number of customer interactions that operators had been taking increased fairly substantially, by about 14% to nearly 900,000 customer interactions a month.

NEIL MCARTHUR said since lockdown, is local lockdowns are meaning that premises-based gambling starts and stops, and so tracking risk is very dynamic. He said that they have continued to take action to try and mitigate risks and to assess the impact. He said they are trying to do this faster than might have been the case before lockdown because they need to. He said the focus on affordability is absolutely key, and a coordinated approach between operators and financial service providers to help put power into the hands of consumers. He said that this could be done either by blocking their ability to make transactions or tracking and giving them information.

NEIL MCARTHUR said that they had recently attended a money and mental health institute event which is geared at how they can work more collaboratively with the finance sector. He said that affordability and age verification controls are the keys to prevent harm in the first place.

CAROLYN HARRIS MP thanked **NEIL MCARTHUR** and said that she did not think they had done enough. She said that they had offered a few suggestions which were completely ignored, including a stake limit that didn't receive any welcoming. She said that she is going to make the presumption that all of the restrictions introduced in the last lockdown will automatically kick in during the second lockdown. She also said that on reverse withdrawals, if they are dangerous, then why are they not banned anyway? She also asked why the Gambling Commission has not been supportive of scrapping the VIP schemes.

NEIL MCARTHUR said that he anticipated the question around stake limits, and the reason they focused on the areas that they did is because the data they have is that the vast majority of staking is below £2.00 so they're not convinced that stake limits are going to have much of an impact.

CAROLYN HARRIS MP said that she meant spend – stake limits would contribute to an average spend. She asked him why he did not introduce a limit on what people could spend.

NEIL MCARTHUR said that their immediate focus was on knowing your customer and affordability. He said that they are currently consulting on the question of customer interaction but that there was a concern about the effectiveness of that in the current circumstances.

CAROLYN HARRIS MP said that surely the VIP scheme is businesses knowing exactly how their customers act because they are the ones who are scrutinising and contacting those customers - on an hourly basis in some cases. She said that surely this would have been one way of helping customers – scrapping the VIP scheme.

NEIL MCARTHUR said that there are two parts to this. The first is that they were already pushing industry hard around VIP schemes and in March they came up with their own steps that had reduced the number of players in VIP schemes by about 70%.

CAROLYN HARRIS MP disagreed with that interpretation - that was because they excluded people under 25, however, the average player in the VIP scheme is around 39.

NEIL MCARTHUR said he didn't think this was quite right and that one of the other steps they took was to prevent anybody under the age of 25 being in a VIP scheme. He said they also asked more questions around affordability, with the net effect of that being that the number of people in VIP schemes was already reduced by 70%. He said that as a result of the checks that were now made mandatory, they have gone further still. He said that the approach to VIP has shifted significantly. He said that loss is absolutely a concern and it has 2 dimensions. One is staking and one is time of play. He said that he knew that time spent gambling and the loss of control about gambling is a marker of harm and that this is why they had been pushing operators to use all of the data available to them and be careful about cross-selling between customers.

CAROLYN HARRIS MP asked if **NEIL MCARTHUR** hand on heart believed that operators had done enough during lockdown to prevent gambling related harm.



Gambling Related Harm APPG

NEIL MCARTHUR said he did not think it was a question of belief. He said that what he is focused on is evidence.

CAROLYN HARRIS then asked again about reverse withdrawals.

NEIL MCARTHUR said one of the things they have introduced through the vehicle of guidance, but it had the effect of changing license conditions, was rules on reverse withdrawals. They took action because they knew one of the markers of harm was a situation where players were withdrawing the money, but before it got into their hands they would reverse it and start gambling again. He said that this was one of the pieces of work that they pushed in the challenges they set around March but the industry came up short on so they imposed it on them.

CAROLYN HARRIS MP asked if **NEIL MCARTHUR** would be supporting the continuation of stopping reverse withdrawals in the Gambling Review.

NEIL MCARTHUR said when the Gambling review comes there are issues that need to be dealt with but that reverse withdrawals and the permissibility of those is an issue that the Commission can and has dealt with.

SIR IAIN DUNCAN SMITH MP asked **NEIL MCARTHUR** about VIP rooms. He said that reductions can be temporary and this still means that they are active. He said that he did not understand the grounds for failure to advocate for the end of VIP rooms. He said that VIP rooms are there for one purpose - to make gamblers who gamble regularly to gamble more, particularly if they lose more – to lose more and lose bigger. He said that the inducements are not only immoral but are also frankly verging on illegality so he does not understand why the Commission's position is rock solid and they recommend to outlaw inducements in any organisation.

NEIL MCARTHUR said that the judgement they have reached based on the evidence is that they think it is possible to operate these schemes effectively and they have given the industry one last chance to do so. He said that the way these schemes have been operating has been appalling and they have taken a lot of action but they have not reached the judgement yet that an outright ban is the only way to address the issue.

SIR IAIN DUNCAN SMITH MP asked if **NEIL MCARTHUR** thought that organisations that have structures to induce people to gamble more when they are already losing significantly should exist.

NEIL MCARTHUR said that the way that the schemes are set up is that it is possible to run a scheme in a way that allows people who chose and want to spend money gambling, can do so and be treated as loyal customers. He said that it is undoubtedly the case that VIP schemes historically have been a mile away from that. He said that they had been monumentally misused where judgement had been entirely around spend and not affordability. He said that his point was that if a person can afford it and wants to afford it, and they can be kept safe while doing so then that is possible. He said that if it isn't, the industry knows that there are no more last chances.

SIR IAIN DUNCAN SMITH MP said that he did not understand the definition of a high-roller that can somehow afford to lose even more money and that the inducements for people to gamble because they are losers is surely wrong in principle anyways. He said that if you look at the VIP rooms, they have already been warned endlessly about them, why is it that there is one more no last chance. He said that surely now they have had lots of time to clean up their act on this. He said that as long as the VIP room exists, the potential for abuse exists. He asked why the Commission doesn't bite the bullet and simply say they cannot manage these because the inducement to make a profit is far greater than their desire to allow the right people will be on these schemes.

NEIL MCARTHUR said that they had recently consulted on this and have published the outcome of the consultation and that the Commission ended up in the same position that the House of Lords Select Committee ended up in - which was by making it about personal accountability. There would be a senior executive on each body that was personally accountable for the decisions that have been made and we have been absolutely clear that if they don't stamp out malpractice we will stamp out those schemes entirely.

GERALD JONES MP said in terms of restrictions being reimposed in the second lockdown would he expand on those points. He also said that online gambling has taken place during lockdown and that there is a danger this becomes the norm – so what safeguards the Gambling Commission could put in place to address this.

NEIL MCARTHUR said that they have continued to develop new requirements and making them mandatory going forward. He said that they have continued work around VIP schemes, around game design, customer interaction and affordability and they will continue to do so. In terms of the shift of players in products, he said that they are continuing



Gambling Related Harm APPG

to look at games and game design and the things that induce a loss of control in players. He said that the protection of players requires a multifaceted approach where players are kept safe. He said that nobody has cornered the market on expertise here and that gambling is a product that carries an inherent risk and that we must keep working hard to make gambling safer.

CAROLYN HARRIS MP asked for an answer on the reintroduction of restrictions.

NEIL MCARTHUR said that rather than reintroduce restrictions, the restrictions have stood and since then they have imposed them as mandatory. For example, the question around imposing reverse withdrawals we have consulted on this – it is not a case of us introducing it over lockdown and then reducing it going forward, we are now trying to make them permanent.

CAROLYN HARRIS MP asked if there were no reverse withdrawals allowed now. She also asked if everything the industry has perceived to have done during the last lockdown will continue during this lockdown.

NEIL MCARTHUR said that all of the guidance we have put in place continues to stand and the only time it doesn't is when they have decided to put in place something that is bigger and better.

CAROLYN HARRIS MP asked if we are likely to see a lessening of adverts on TV or if the wording will just change on them.

NEIL MCARTHUR said in relation to advertising, a number of bodies play a part in it and wider questions around volume are not a matter for the Commission.

CAROLYN HARRIS MP asked if **NEIL MCARTHUR** saw the stock market – the last time **GERALD JONES** asked a question, the stock market for the industry went down £800 million so **GERALD JONES** is a bit of a dark horse. She asked if he noticed that when the vaccine was announced, that shares in gambling companies went down but shares in airline industries went up. She said that this says to her that people who invest in gambling were a little concerned that there would not be as much money to be made if we get a vaccine which she thought was ironic. She asked if marketing and cross selling was a priority for the Commission.

NEIL MCARTHUR said that how you are treating your customer and how you market must be done responsibly and must be done in a way that doesn't put people at risk. He said that it is one of a variety of things they are focused on.

HEATHER WARDLE said the Gambling Commission said it would be led by evidence but that there is evidence that there are people who are switching into different types of products are more vulnerable than those who aren't. We know that an industry strategy is the cross-sell so she thinks that this requires a more robust consideration by the Commission rather than just saying these need to be done responsibly.

NEIL MCARTHUR said he would not disagree with this and that it is a question of priorities and which things you think will have the biggest impact. He said that the question of cross selling is an important one and we need to look at it and where there is evidence that it is exposing people to an increased risk of harm we will want to deal with that rapidly.

HENRIETTA BOWDEN JONES said she was disappointed to see the social responsibility messages that were essentially adverts. She said that she thought the Commission could have taken a stand on this.

CAROLYN HARRIS MP asked **NEIL MCARTHUR** if he would come back again and that she promised to behave.

LIZ RITCHIE said that **NEIL MCARTHUR** said that gambling carries an inherent risk for some people and that this is the responsible gambling message that is killing people because it places all the responsibility onto individual people. The reality is that some gambling products carry an inherent risk for all people.

NEIL MCARTHUR said he was sorry if he gave this impression.

LIZ RITCHIE said that this sentence is used again and again and that is what it means.

CAROLYN HARRIS MP asked who could have stopped the social responsibility messages – was it **ANDREW TAYLOR** or was it **NEIL MCARTHUR**.



Gambling Related Harm APPG

ANDREW TAYLOR said that they do not regulate responsibility messaging – it's a voluntary measure by the industry.

CAROLYN HARRIS MP thanked everyone for coming and for their time.

Evidence:

Advertising Standards Agency:

<https://www.asa.org.uk/news/gambling-ads-keeping-a-watching-brief.html>

<https://www.asa.org.uk/news/covid-19-trends-in-advertising.html>

Gambling Commission:

<http://www.gamblingcommission.gov.uk/news-action-and-statistics/News/data-shows-the-impact-of-covid-19-on-gambling-behaviour-in-august-2020>

<http://www.gamblingcommission.gov.uk/news-action-and-statistics/News/gambling-commission-publishes-first-national-strategic-assessment-alongside-its-latest-annual-compliance-and-enforcement-report>