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Summary

Nearly half of British adults gamble regularly, benefiting a gambling industry worth more than £14 billion a year, one of the largest in the world. Most people who gamble do so without issue; however, around a third of a million people experience problem gambling, and it is likely that many more suffer gambling-related harm. The Government has a duty to ensure that gambling regulation makes the activity safe for all, while allowing those who enjoy gambling the freedom to do so.

The legislation underpinning gambling regulation in Britain is the Gambling Act 2005. The Act liberalised gambling and established the Gambling Commission as the sector's regulator and licensing body. Gambling has changed dramatically since then, largely because of the massive growth in online gambling. Most people who gamble now do so online, increasingly via smartphones, with the online sector now dwarfing traditional, land-based forms of gambling in terms of revenue. This shift led the Government to launch a review of the Gambling Act 2005 in December 2020, to ensure that gambling regulation "is fit for the digital age". After repeated delays, the Government published the Gambling White Paper in April this year. Its proposals will entail the most significant reform of British gambling regulation since the 2005 Act. These proposals have been the focus of our inquiry.

The greatest challenge for the Government's reforms is one of time. Nearly all the White Paper's measures will be subject to consultation to work out their technical detail. The delay to the White Paper means there is at best a year remaining in the current Parliament for the Government to conduct these consultations and then implement the finalised reforms, several of which will require secondary—and in a few cases, primary—legislation. We are concerned that no mention of gambling legislation was made in the King's Speech. The Government must also ensure that the Gambling Commission, which is to lead on several consultations and oversee the implementation of the White Paper's reforms, is suitably resourced.

The Gambling White Paper proposes a set of enhanced protections for online gambling consumers. The most prominent of these is a system of financial risk checks to be conducted by gambling operators on customer accounts that lose certain amounts of money within given timeframes. We support the principle of these checks but consider that there is work for the Gambling Commission's consultation to ensure that they are suitably "frictionless". We recommend that the Commission conducts a full pilot of the system before it is fully implemented. The White Paper also proposes introducing a stake limit for online slots games, which have the one of the highest associations with harm of any gambling product. We consider that this stake limit—currently subject to consultation—should be in line with those for electronic gaming machines found in the land-based sector and not exceed £5. We support the Government's approach of establishing additional online protections for young adults aged 18–24, through a lower stake limit and thresholds for triggering financial risk checks.

The Government also proposes reforms relaxing some of the Gambling Act's restrictions on land-based gambling operators, particularly regarding the availability of higher-stake electronic gaming machines in several types of gambling premises. We agree that the availability of equivalent online products means these restrictions are now less relevant,

but the Government and the Commission must carefully monitor the impact of these changes on the risk of harm. We also support the introduction of cashless payments on electronic gaming machines, subject to safeguards and provided that the option to pay with cash remains available. A proposed new power for local authorities to use cumulative impact assessments in handling gambling premise licensing applications is welcome.

The Government has proposed changes to the regulation of gambling advertising, including new rules around direct marketing and promotional offers. These are welcome in themselves, but we consider that the Government should have taken a more precautionary approach to gambling advertising and sports sponsorship overall, particularly to reduce children's exposure. Another major risk to children is the increasing blurring of the boundaries between gambling and video games, as seen through the example of loot boxes. The Government has put forward separate proposals regarding loot boxes specifically, but we are not convinced that the existing regulatory framework will be adequate to address this wider trend.

The White Paper proposes that the Government will introduce a statutory gambling levy on gambling operators to fund problem gambling research, prevention, and treatment, replacing the existing voluntary funding system. This is a long overdue reform and will ensure a significant uplift in long-term funding as well as improved transparency in the commissioning of research and services. We support the proposed model of governance and structure of the levy, but the Government must ensure that funding is ringfenced and directed towards targets for reducing gambling harm, set out in a new national strategy to reduce gambling harms. The Government must also ensure that currently voluntary sector treatment and prevention providers are fully supported during the transition to the statutory levy.

The White Paper also set out the creation—led by the gambling industry—of a gambling ombudsman to adjudicate disputes between gambling operators and their customers which relate to social responsibility failings. This is a welcome measure and will address the current gap in redress with respect to such complaints. We recommend that the ombudsman should be the sole redress provider for all types of gambling consumer dispute adjudication.

1 Introduction

1. 44% of British adults gamble at least once a month.¹ For many, gambling is a fun hobby or pastime—a way to socialise with family and friends, and for fans to further enjoy their sports. Bingo clubs and other venues can play an important socialisation role in deprived local communities.² The British gambling industry is worth some £14 billion a year, pays more than £4 billion annually in tax, and employs more than 110,000 people.³ It attracts tourism, and helps to support some of this country’s major sports, particularly horseracing.⁴ However, gambling can be destructive: 0.4% of adults—roughly equating to 300,000 people—experience problem gambling.⁵ For each of these, it has been estimated that around six other people are adversely affected by gambling-related harm.⁶ The negative impacts of gambling can include debt, loss of employment, family breakdown, and the deterioration of physical and mental health. At its worst, gambling can lead to suicide.⁷ There is also a cost to society, including to the NHS and the criminal justice system. In approaching gambling regulation, Government must strike a careful balance: preventing harm for all, while allowing those who gamble safely the freedom to do so.

2. The legislation underpinning gambling regulation in Great Britain is the Gambling Act 2005.⁸ The Act established the Gambling Commission as the regulator of the gambling industry, with a statutory duty to permit gambling in so far as the Commission thinks it reasonably consistent with the licensing objectives set out by the Act: to keep gambling fair, free of crime, and to protect children and vulnerable adults from harm or exploitation.⁹ This “aim to permit” represented a departure from the previous, more restrictive regulatory approach that had treated gambling as an activity to be tolerated but not encouraged.¹⁰ Alongside the liberalisation brought about by the 2005 Act, and largely unforeseen by the legislation, the other major development in gambling in the last two decades has been the huge increase in online gambling. Virtually every form of gambling available in a casino, betting shop, bingo club, or other designated venue can now also be accessed online. Indeed, most gambling now takes place online, increasingly via smartphones.¹¹

3. Despite these changes and the ease of access to online gambling products, the rate of problem gambling (defined in Box 1 below) has declined slightly in recent years. In 2021, the rate among the adult population was 0.4%, compared to 0.5% in 2018 and 0.7% in

1 This figure is inclusive of people who only play National Lottery products. Once that group is discounted, adult four-weekly participation in all other forms of gambling is 28%. Gambling Commission, ‘[Gambling behaviour in 2022: Findings from the quarterly telephone survey](#)’, accessed 7 November 2023.

2 The Bingo Association ([GAM0091](#))

3 Gambling Commission, ‘[“Industry Statistics - November 2022”](#)’, accessed 7 November 2023; Betting and Gaming Council ([GAM0077](#))

4 Hippodrome Casino Limited ([GAM0131](#)); British Horseracing Authority ([GAM0076](#))

5 NHS Digital, ‘[Health Survey for England 2021: Data tables](#)’, accessed 16 November 2023; NHS Digital, ‘[Health Survey for England 2018: Supplementary analysis of gambling](#)’, accessed 16 November 2023

6 Goodwin, B.C., Browne, M., Rockloff, M. and Rose, J., ‘[“A typical problem gambler affects six others.”](#)’ *International Gambling Studies*, vol 17 (2017), pp.276–289.

7 Samaritans ([GAM0034](#)); [Q237](#)

8 Gambling regulation is a devolved matter in Northern Ireland, apart from certain forms of advertising and promotion of gambling, which is a reserved matter.

9 Gambling Act 2005, [Section 1](#)

10 House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), p.21

11 Gambling Commission, ‘[Taking a more in-depth look at online gambling](#)’, accessed 16 November 2023

2016.¹² But measures of problem gambling do not necessarily encompass the full range of harms that gambling can cause, including to friends and family. Within these headline statistics certain people are more likely to experience harm, including children and young adults.¹³ Gambling is also not as well understood as it should be, due to a relative lack of research into it as a subject, compared to, for example, alcohol consumption.¹⁴ In addition, there has been a growing awareness of how certain products and industry practices, often facilitated by new technology, may be causing or contributing to harm. In recent years, new rules have been introduced for Fixed Odds Betting Terminals, online slots games, as well as for VIP customer schemes run by gambling companies.¹⁵ The online gambling industry has been criticised for how a significant proportion of its profits comes from a small number of customers who may be experiencing problem gambling.¹⁶ Combined, these factors have driven calls for reform to gambling regulation.

Box 1: Terminology

Throughout this report we refer to “problem gambling” and “gambling-related harms”. These terms overlap but are not interchangeable. Problem gambling is defined as “gambling to a degree that compromises, disrupts, or damages family, personal or recreational pursuits”.¹⁷ The Gambling Commission regularly produces official statistics on the prevalence of problem gambling, which is most often measured using the Problem Gambling Severity Index (PGSI)—a survey consisting of nine questions about a person’s gambling and for which responses are scored from 0–3. On the PGSI:

- Problem gamblers (those scoring above eight) are “gamblers who gamble with negative consequences and a possible loss of control”.
- Moderate risk gamblers (those scoring 3–7) are “gamblers who experience a moderate level of problems leading to some negative consequences”.
- Low risk gamblers (those scoring 1–2) are “gamblers who experience a lower level of problems with few or no identified negative consequences”.¹⁸

“Gambling-related harms”, is a broader term referring to the adverse impacts of gambling on the health and wellbeing of individuals, families, communities and society as a whole.¹⁹ Measures of problem gambling do not necessarily capture the full range of harms that can be experienced as a consequence of gambling; however, there is currently no single, recognised measure of gambling harms in Britain.

Some people, including individuals who have suffered from gambling, prefer the terms “disordered gambling” or “gambling disorder”, to “problem gambling”, as these better identify the issue as one of mental health whereas the latter can imply individual fault.²⁰ We are sympathetic to this view but, for consistency with official statistics and the White Paper itself, have chosen to use “problem gambling”.

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- 12 NHS Digital, “[Health Survey for England 2021: Data tables](#)”, accessed 16 November 2023; NHS Digital, “[Health Survey for England 2018: Supplementary analysis of gambling](#)”, accessed 16 November 2023 “[Gambling Commission publishes latest combined Health Survey](#)”, Gambling Commission press release, 6 September 2018
- 13 Office for Health Improvement & Disparities, “[Gambling-related harms evidence review: summary](#)”, accessed 17 November 2023
- 14 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.131
- 15 Gambling Commission, “Feature article: Impact of B2 stake change”, accessed 16 November 2023; “[Gambling Commission announces package of changes which make online games safer by design](#)”, Gambling Commission press release, 2 February 2021
- 16 House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), summary
- 17 Gambling Commission, “[Problem and at-risk gambling](#)”, accessed 17 November 2023
- 18 GamCare ([GAM0038](#))
- 19 Gambling Commission, “[Update: Pilot of survey questions to understand gambling-related harm](#)”, accessed 17 November 2023
- 20 [Q251](#)

4. At the last General Election in 2019, the Conservative Party Manifesto contained a pledge to review the Gambling Act 2005 to ensure it was fit for the digital age.²¹ The manifestos of the Labour Party, Scottish National Party, and Liberal Democrats also contained pledges to reform gambling law.²² Enacting its manifesto pledge, the Government launched a review of the 2005 Act in December 2020, with its call for evidence closing in April 2021. The objectives of the Review were to:

- Examine whether changes are needed to system of gambling regulation in Great Britain to reflect changes to the gambling landscape since 2005, particularly due to technological advances.
- Ensure there is an appropriate balance between consumer freedoms and choice on the one hand, and prevention of harm to vulnerable groups and wider communities on the other.
- Make sure customers are suitably protected whenever and where they are gambling, and that there is an equitable approach to the regulation of the online and the land-based industries.²³

A White Paper setting out the Government’s reforms was widely expected to be published in the first half of 2022, but it was repeatedly delayed amid the wider political disruption of that year. The Government finally published the Gambling White Paper in April this year. Titled, *High Stakes: Gambling Reform for the Digital Age*, the White Paper’s proposals will entail the most significant reform of British gambling regulation since the 2005 Act, though the details of nearly all those proposals are or will be subject to consultation.

Our inquiry

5. We launched our inquiry in December 2022. At that time, there was considerable uncertainty about the status of the Gambling White Paper. We aimed to scrutinise recent changes to gambling regulation and the Government’s lack of progress in bringing forward the White Paper. Our original terms of reference are set out below:

- What is the scale of gambling-related harm in the UK?
- What should the key priorities be in the gambling White Paper?
- How broadly should the term, ‘gambling’, be drawn?
- Is it possible for a regulator to stay abreast of innovation in the online sphere?
- What additional problems arise when online gambling companies are based outside of UK jurisdiction?

21 The Conservative and Unionist Party, *The Conservative and Unionist Party Manifesto 2019: Get Brexit Done, Unleash Britain’s Potential*, (November 2019) p.20

22 The Labour Party, *It’s Time for Real Change, The Labour Party Manifesto 2019*, (November 2019), p.55; Scottish National Party, *Stronger For Scotland, 2019 Manifesto*, (November 2019), p.28; Liberal Democrats, *2019 Liberal Democrat Manifesto: Plan for Britain’s Future*, (November 2019), p.56

23 Department for Digital, Culture, Media and Sport, *Review of the Gambling Act 2005 Terms of Reference and Call for Evidence*, 8 December 2020

6. We received more than 100 submissions following our original call for written evidence. After the White Paper's publication on 27 April 2023, we issued a supplementary call for evidence, under the following terms of reference:

- What are the most welcome proposals in the Gambling White Paper?
- Are there any significant gaps in the Government's reforms?
- What are the potential barriers to the Government and Gambling Commission delivering the White Paper's main measure by summer 2024, the Government's stated aim?

7. We received a further 60 submissions—and held four oral evidence sessions, with witnesses including academics, NHS clinicians, gambling charities, industry trade bodies, the Gambling Commission and the Government's Minister for Gambling, the Rt Hon Stuart Andrew MP. We would like to thank everyone who contributed to this inquiry.

2 Implementation of the Gambling White Paper

8. The Gambling White Paper sets out 17 overarching policy proposals, including new protections for online gambling consumers; the creation of a statutory gambling levy to raise money for problem gambling research, prevention and treatment; the relaxation of certain restrictions of land-based gambling premises as well as new powers for local authorities which licence them; and the creation of a non-statutory gambling ombudsman to adjudicate disputes between gambling companies and the customers relating to social responsibility failings. It also proposes new powers for the Gambling Commission to tackle unlicensed online gambling operators and a review of the regulator's fees and of how those fees are set. The White Paper contains no measures applying to The National Lottery, as that is regulated under separate legislation and not within the scope of the Government's review of the 2005 Act.²⁴

Consultations on the White Paper

9. The Government intends that the main measures in the White Paper will be in force by summer 2024.²⁵ However, 14 of the document's 17 policy proposals are or will be subject to consultation or review by DCMS or the Gambling Commission before being implemented. The most repeatedly cited concern in our supplementary call for evidence was that, with limited time left in the current Parliament, running multiple consultations and then delivering the finalised reforms would be challenging for the Government and risked some proposals being delayed indefinitely.²⁶ Some submissions argued that the volume of evidence received for the Gambling Act Review meant that the Government had a sufficient evidence base to act and further consultations were unnecessary.²⁷ As the White Paper notes, DCMS received nearly 16,000 responses to its call for evidence held between December 2020 and April 2021, though the majority of these were responses to a survey the department ran as part of its evidence-gathering.²⁸ Questions were also raised with us about whether the Gambling Commission has sufficient resources to conduct the multiple consultations it is due to lead on.²⁹ Though the Government has committed to reviewing the Commission's fees paid by licensees, which funds its work, this is not expected until 2024.³⁰

10. In oral evidence, the Government and Gambling Commission argued that the White Paper sets out the Government's overall intentions; the consultations were necessary to work out the technical detail of the White Paper's proposals, and to prevent the risk of legal challenge via judicial review, which would only delay gambling reform further.³¹ Andrew

24 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023

25 *Ibid*, p.12

26 All-Party Parliamentary Group on Gambling Related Harm ([GAM0153](#)); Peers for Gambling Reform ([GAM0125](#)); British Medical Association ([GAM0140](#)); Novomatic UK ([GAM0147](#)); Merkur UK ([GAM0130](#)); Gambling Business Group ([GAM0103](#)); Betknowmore UK ([GAM0107](#))

27 Peers for Gambling Reform ([GAM0125](#)); Gambling Related Harm All-Party Parliamentary Group ([GAM0153](#)); Professor Jim Orford ([GAM0109](#))

28 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.235

29 All-Party Parliamentary Group on Gambling Related Harm ([GAM0153](#)); [Q264](#) [Will Prochaska]

30 *Ibid*, p.127

31 [Qq269-270](#); [Q345](#)

Rhodes, CEO of the Commission, stressed that the consultations had to be “meaningful” and carried out properly, which made it difficult to say exactly when the finalised reforms would be implemented. He was confident that the Commission is adequately resourced in the short-term to conduct the consultations in addition to its regulatory work.³²

11. The White Paper sets out a high-level timetable for when its various consultations will commence, with a first tranche due to launch in summer 2023.³³ At the time of publishing this report, this appears to be on track. The first tranche of six consultations were launched by the Government and Commission in July and closed in October.³⁴ DCMS’s consultation on the statutory levy opened in October and closed in December.³⁵ The Government has also begun its review of the Horserace Betting Levy.³⁶ The Commission launched its second tranche of consultations on the White Paper in late November 2023, which will include proposals to strengthen customer-led tools and to make incentives, such as free bets and bonuses, more socially responsible. These consultations will close in February 2024.³⁷ Work to establish a Gambling Ombudsman (which we examine fully in Chapter 8), led by the Betting and Gaming Council (BGC), is also underway. The BGC noted in oral evidence that the process of establishing an ombudsman scheme normally takes three years, rather than one, but that they were nevertheless “on pace” with their timetable.³⁸

12. Appearing before us in June, the Secretary of State noted that most of the White Paper’s reforms can be brought into force via secondary legislation or changes to the Gambling Commission’s Licensing Conditions and Codes of Practice (LCCP), rather than primary legislation, making implementation quicker.³⁹ However, several measures in the White Paper will require primary legislation, not least the proposed new powers for the Gambling Commission to determine its own fees and act against black market operators. In the ministerial evidence session for our inquiry, Rt Hon Stuart Andrew MP, Minister for Sports, Gambling and Civil Society, confirmed the department would seek to bring forward the requisite primary legislation but acknowledged that doing so would be a challenge in what was expected to be a “packed” fourth parliamentary session.⁴⁰ The 2023 King’s Speech, and the more detailed briefing pack accompanying it, made no mention of gambling legislation.⁴¹

13. It is welcome that the Government and Gambling Commission are proceeding with the various consultations on the White Paper at pace, but delivering its main proposals by summer next year will be challenging and at risk from wider political events. We are concerned that no mention of gambling legislation was made in the

32 [Qq269–270](#)

33 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.12–16

34 [“Gambling White Paper consultations launched in step forward for reform”](#), Department for Culture, Media and Sport press release, 26 July 2023

35 Department for Culture, Media and Sport, [“Consultation on the statutory levy on gambling operators”](#), accessed 17 October 2023

36 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.12

37 [“Views wanted on proposals to make gambling safer”](#), Gambling Commission press release, 29 November 2023

38 [Q146](#)

39 Oral evidence taken on 6 June 2023, HC (2022–23) 158, [Qq314–135](#)

40 [Q346](#)

41 The Prime Minister’s Office, [The King’s Speech 2023](#), 7 November 2023

King’s Speech. *In its response to this report, the Government must set out a detailed timetable for the delivery of the White Paper’s proposals, including when relevant primary legislation will be introduced to Parliament.*

14. Evidence from some gambling companies stressed the need for the consultations to be thorough and evidence led, and not rushed, given the potential impact of many of the proposed regulatory changes on the sector.⁴² Other evidence raised concerns that the number of consultations underway at once would mean that organisations with more resources and greater capacity to respond, namely gambling companies, may be overrepresented in the evidence base, particularly in relation to academics or individuals with lived experience of gambling harms.⁴³ Mr Rhodes gave some reassurance on these points:

We [the Gambling Commission] look at the quality of what is being provided. We look at the evidence base, the strength of that, the independence of it, and we supplement it with our own research and data gathering as well. I feel confident that, when we have run consultations, that risk of perhaps one side of an argument outgunning the other does not really play into it. We may get a lot of responses on one side of the argument but if they are not driven by clear, robust evidence they are not going to carry as much weight.⁴⁴

15. *Though speed is a necessity, the Government and Gambling Commission must ensure that the White Paper consultations are thorough and receive input from an appropriate range of stakeholders.*

The Gambling Commission’ role in implementation

Resourcing

16. The Gambling Commission is almost entirely funded by licence fees paid by gambling operators.⁴⁵ Licence fees are set by the Secretary of State in secondary legislation and have typically been reviewed every four to five years. This process for setting licence fees has been criticised. A 2020 report by the National Audit Office concluded that the Commission’s ability to ensure consumers are protected from new risks emerging in the gambling industry was constrained by, among other things, its inflexible funding arrangement.⁴⁶ The House of Lords Select Committee on the Social and Economic Impact of the Gambling Industry agreed and recommended the Government and the Commission devise a new, more flexible funding structure.⁴⁷

42 Flutter Entertainment plc ([GAM0148](#)); BritBet Racing LLP ([GAM0141](#))

43 Greater Manchester Combined Authority ([GAM0150](#)); British Medical Association ([GAM0140](#)); Peers for Gambling Reform ([GAM0125](#)); [Q337](#)

44 [Q337](#)

45 Excluding the National Lottery, for which there is a separate funding arrangement.

46 National Audit Office, *Gambling regulation: problem gambling and protecting vulnerable people*, (February 2020), p.10

47 House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), p.56

17. The White Paper accepted these arguments, noting that the Commission’s funding system is unusual compared to other regulators. The Government proposes to give the Commission greater powers to set its own fees annually, though this change will require primary legislation.⁴⁸ As noted above, the Government also plans to review the Commission’s fees in 2024 following the conclusion of the White Paper consultations.⁴⁹

18. The most recent uplifts in the Commission’s fees were in October 2021, resulting in a 55% increase in fees for online operators and a 60% increase in application fees; and in April 2022, when land-based operator licence fees were increased by 15%.⁵⁰ In oral evidence, Mr Rhodes welcomed the upcoming fee review, noting that the Commission’s fees had been deflationary for a long period and were, despite the recent uplift, below where they would have been comparatively.⁵¹ He highlighted that the Commission would need greater resources going forward:

We are an organisation of 351 people. We are not a large regulator and we regulate the largest online gambling industry in the world. If we are going to do more complicated things around regulation, it will require resources to do it but I am very comfortable with our current position. In the longer term, however, we will need to invest more money and have more people with different skills.⁵²

19. We welcome the forthcoming review of the Gambling Commission’s fees and the proposal to give the Commission the power to adjust its own fees annually. These will be vital to ensure the regulator is properly resourced to implement the White Paper’s reforms and respond to future developments in a rapidly developing online industry.

Unlicensed and illegal gambling

20. It is illegal for gambling operators to transact with British customers without a licence from the Gambling Commission and part of the Commission’s role is to tackle unlicensed online operators attempting to do so. Unlicensed operators, often collectively termed the “black market”, may lack consumer protections, permit underage gambling, and be linked to organised crime.⁵³ Evidence from the gambling industry highlighted the threat that the black market can pose to consumers and warned that over-regulation of the licensed sector risked pushing some consumers to gamble with unlicensed operators instead.⁵⁴ This point was made particularly in discussions of financial risk checks (also known as affordability checks), as proposed by the White Paper. It was claimed these checks risk deterring gambling customers if too intrusive and insufficiently “frictionless”.⁵⁵ We discuss these proposed checks fully in the following chapter.

48 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.126–127

49 *Ibid.*

50 *Ibid.*, p.113

51 [Q270](#)

52 [Q271](#)

53 Gambling Commission ([GAM0080](#))

54 Betting and Gaming Council ([GAM0077](#) and [GAM0149](#)); Flutter Entertainment plc ([GAM0045](#) and [GAM0148](#)); Entain PLC ([GAM0050](#)); BV Gaming Ltd ([GAM0083](#)); Bally’s Corporation ([GAM0088](#)); Mr Steve Donoghue (CEO/ Founder at [www.GamblingConsultant.co.uk Limited](#)) ([GAM0092](#)); Bet365 ([GAM0151](#))

55 *Ibid.*

21. Several gambling industry submissions cited a 2021 report by PWC, commissioned by the Betting and Gaming Council, the main gambling industry trade body, which suggested the black market may already be growing. The report found that 460,000 British consumers gambled with unlicensed operators in 2020, compared to 210,000 in 2018/19.⁵⁶ Data from a 2022 report by Yield Sec was also referenced, which found an 85% increase in the number of UK consumer gambling with unlicensed operators during the period of the 2022 FIFA World Cup.⁵⁷ However, others argued that the risk of the black market has been exaggerated by the industry to deter further regulation, and that the correct response to the black market is through enforcement and by raising consumer awareness of its risks.⁵⁸ It was also pointed out that during the Covid-19 pandemic the majority of people stopped gambling when faced with greater restriction, rather than moving to unlicensed alternatives.⁵⁹

22. In the White Paper, the Government estimates that around 2.5% of online gambling in Britain is with unlicensed operators. It notes that determining the exact size of the black market is difficult as unlicensed sites frequently change their identity.⁶⁰ In addition, the Gambling Commission's intelligence regarding illegal operators has historically relied on complaints from consumers using such sites, but individuals may only complain when something goes wrong.⁶¹ Andrew Rhodes told us that he thought the risk of the black market has been overstated, adding "[it] is very difficult for illegal operators to get access to the UK market because it is so competitive and the rate of channelisation is so high."⁶² He acknowledged that the Commission does not know enough about the black market and that it would be one of the regulator's research priorities for the next three years.⁶³

23. The Gambling Commission attribute the recent growth in the size of the black market as being largely driven by unlicensed sites targeting those who have self-excluded from gambling.⁶⁴ Since 2020, all licensed remote operators have been required to register with GAMSTOP, a self-exclusion scheme which enables consumers to block their own access to licensed gambling websites. As of February 2023, some 345,000 people have self-excluded using it. Many black market sites advertise themselves as being "not on GAMSTOP" to attract those using the scheme, which will include those experiencing problem gambling.⁶⁵ These sites are easy to find and access using a search engine.⁶⁶

56 PWC, *Review of unlicensed online gambling in the UK*, (February 2021), p.7

57 Entain PLC ([GAM0050](#))

58 Peers for Gambling Reform ([GAM0072](#)); All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); Dr Heather Wardle (Adam Smith Lord Kelvin Reader in Social Sciences at University of Glasgow); Professor Gerda Reith (Professor of Social Sciences at University of Glasgow); Dr Chris Bunn (Senior Lecturer at University of Glasgow); Dr Fiona Dobbie (Senior Lecturer at University of Edinburgh) ([GAM0062](#))

59 Dr Heather Wardle (Adam Smith Lord Kelvin Reader in Social Sciences at University of Glasgow); Professor Gerda Reith (Professor of Social Sciences at University of Glasgow); Dr Chris Bunn (Senior Lecturer at University of Glasgow); Dr Fiona Dobbie (Senior Lecturer at University of Edinburgh) ([GAM0062](#)); Peers for Gambling Reform ([GAM0072](#)); All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#))

60 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.121–123

61 *Ibid.*

62 [Qq277–278](#)

63 [Q279](#)

64 [Q278](#)

65 *Ibid.*

66 GAMSTOP ([GAM0059](#))

24. The Commission's current enforcement against unlicensed operators focuses on disrupting their ability to do business, and relies on the voluntary agreement of payment providers, web hosting companies, and other third parties to stop offering services to such websites. The White Paper proposes giving this process statutory backing, by giving the Commission the power apply for a court order requiring relevant third parties to implement measures to disrupt the business of an illegal gambling operator.⁶⁷ We note that, in its advice to the Government on the Gambling Act 2005 Review, the Commission recommended that it be able to exercise this power directly, without the need for a court order. This was on the grounds of needing to act quickly against illegal operators, and the high costs associated with the court order process.⁶⁸ The White Paper states that using a court order will ensure the process has procedural safeguards, give third-party providers certainty, and will mean that if an order is disregarded it can be enforced as a contempt of court. Creating the new power will require primary legislation, to be brought forward "when Parliamentary time allows".⁶⁹

25. We consider that while it will be important to monitor the size of the black market in response to greater regulation, more pertinent is the fact that, right now, a number of easily-accessible illegal sites are targeting some of those who have self-excluded from gambling. The proposed new power for the Gambling Commission to act against illegal operators is welcome, and the Government must ensure legislation establishing this power is brought forward in this Parliamentary session. *In response to this report, the Government and Gambling Commission must set out how they will address the growing trend of unlicensed gambling sites targeting the self-excluded.*

26. While the black market is a risk the Government and Gambling Commission must be mindful of, it should not deter appropriate regulation of the licensed sector. The debate about the threat posed by the black market partly stems from a lack of understanding about its size. *The Gambling Commission must continue to work to improve its knowledge of the black market and its ability to monitor the number of British consumers gambling with illegal operators. The Commission should set out its plans to do so in response to this report.*

67 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.123

68 Gambling Commission, [Advice to Government - Review of the Gambling Act 2005](#), April 2023, pp.59–60

69 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.123

3 Online gambling protections

27. The most significant development in gambling since the 2005 Act was passed has been the growth of the online industry. As of 2021–22, 27% of adults gamble online, compared to 18% in 2017–18. Online participation has now surpassed that for land-based gambling, which in the same period fell from 35% of adults to 26.5%.⁷⁰ This decline coincided with the Covid-19 lockdowns, during which access to land-based forms of gambling was restricted.⁷¹ Excluding The National Lottery, the gross gambling yield of the online sector is now almost double that of the land-based industry, at £6.4 billion compared to £3.5 billion as of March 2022.⁷² Most people access online gambling using smartphones, particularly younger adults: three-quarters of 18–34 years-olds who gamble online use smartphones to do so.⁷³ The Government’s review of the 2005 Act was primarily in response to this growth of the online industry, to ensure gambling regulation “is fit for the digital age”.⁷⁴ The Gambling White Paper contains several proposals aimed at improving protections for online gambling consumers from gambling-related harm.

Financial risk checks

28. All online gambling is account-based, and Gambling Commission rules require online gambling operators to monitor customer account data to identify those at risk at harm and act to protect them.⁷⁵ The most recent iteration of these rules specify seven categories of indicators of harm and set out how operators must intervene where risk of harm is identified.⁷⁶ Interventions by operators may include encouraging or requiring a customer to set spending limits, suspending marketing to them, signposting gambling support services, or suspending or closing the customer’s account. The indicators of harm include unaffordable spending;⁷⁷ however, the White Paper states that assessment of affordability is inconsistent among gambling operators and there are examples of gambling companies failing to intervene properly in response to customers spending sums clearly unaffordable for most people.⁷⁸ The Minister cited some of these cases in oral evidence: a nurse who was allowed to gamble £245,000 in three months, and a customer who spent £70,000 in 10 hours, without appropriate interventions from the gambling operators in question.⁷⁹

29. The White Paper proposes introducing a system of financial risk checks to improve standards and consistency among gambling operators. They will be required to carry out these checks on customer accounts which lose certain amounts of money within given timeframes. The system will comprise of two levels: “light touch” checks at moderate

70 Gambling Commission, “[Gambling participation: activities and mode of access–February 2023](#)”, accessed 20 November 2023

71 Ibid.

72 Gambling Commission, “[Industry statistics: November 2022](#)”, accessed 20 November 2023

73 Gambling Commission, “[Taking a more in-depth look at online gambling](#)”, accessed 20 November 2023

74 Department for Digital, Culture, Media and Sport, [Policy Paper: Review of the Gambling Act 2005 Terms of Reference and Call for Evidence](#), 8 December 2020

75 “Account-based” gambling refers to gambling via an online account linked to an identified person. An individual must create an account with an online gambling operator before they can use any of its gambling products.

76 These seven categories are: Patterns of spend, Customer-led contact, Consumer spend, Time indicators, Behaviour, Use of gambling management tools, and Account indicators. See Department for Culture, Media and Sport, [High Stakes: Gambling Reform for the Digital Age](#), CP 835, April 2023, p.32

77 Ibid, pp.31–40

78 Ibid, p.37

79 [Q373](#)

levels of expenditure, and “enhanced” checks triggered by higher losses. The White Paper frames the checks as a means to identify three key financial indicators of harm (set out in Box 2 below), rather than as a general assessment of whether a customer can afford what they are gambling. Most evidence to us referred to the proposed checks as “affordability checks”, and we are not entirely convinced by the Government’s distinction, given that a customer’s financial risk profile will to a large extent be determined by their ability to afford gambling losses. But, for consistency with the White Paper, we use the Government’s terminology and describe the checks as “financial risk checks”.

Box 2: Summary of the Gambling White Paper’s proposed model of customer financial risk checks

A 2020 Gambling Commission consultation identified three key financial risks,⁸⁰ which the proposed model of checks is designed to identify:

- **Financial vulnerability:** where customers cannot absorb additional financial strain incurred through gambling, even at modest levels of spending. The Government proposes checks for this risk will be triggered at a £125 net loss in a rolling month or £500 in a rolling year (net losses will not include restaked winnings). These checks will use open-source information such as declared bankruptcies, County Court Judgements, and average postcode affluence. The White Paper states that they will be frictionless for the consumer and take seconds to process. Around 20% of all online gambling accounts in a calendar year are estimated to trigger these checks.
- **Binge gambling:** where customers lose large sums of money within a matter of minutes or hours. The Government proposes that a customer losing more than £1,000 in a rolling 24-hour period will be subject to an enhanced financial risk check. This will access more personal data to consider factors like discretionary income. The White Paper states that for most customer accounts, these checks will be conducted by credit reference agencies and will not interrupt the customer experience. In some cases, however, checks by credit reference agencies will not be possible and information will need to be collected directly from customers, though the White Paper states it may be possible to streamline this process using open banking in some cases.
- **Unaffordable losses sustained over time:** where customers incur large losses over a period of weeks or months. Customers with a net loss of £2,000 in a rolling 90-day period will also trigger an enhanced check, in the same manner outlined in the paragraph above.

If these checks raise concern about a customer, gambling operators will have to respond. The appropriate intervention will depend on the risks identified and the customer’s wider profile. The exact details of this, and the model of risks checks as a whole, are subject to the outcome of a Gambling Commission consultation launched in July.⁸¹

On the basis of them having the lowest average discretionary income of any adult age band, and of younger adults being more susceptible to gambling-related harm, the White Paper proposes that the thresholds for triggering financial risk checks will be halved for those aged 18 to 24. We discuss this and other proposals concerning children and young adults specifically in Chapter 3.

Source: Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, pp.42–43

80 [“Update on Remote Customer Interaction Consultation”](#), Gambling Commission press release, 25 May 2021

81 Gambling Commission, [“Summer 2023 consultation on proposed changes to Licence Conditions and Codes of Practice \(LCCP\), Remote Gambling and Software Technical Standards \(RTS\), and arrangements for Regulatory Panels”](#), accessed 18 September 2023

30. The White Paper predicts that some gambling customers subjected to a financial risk check will reduce their gambling spending—either voluntarily or because of an intervention by the gambling operator.⁸² Though a minority of accounts will be affected by the checks, this will include high-spending accounts which currently provide a large proportion of gambling companies' gross gambling yield (GGY).⁸³ According to the Department's high-level impact assessment, the checks will have the largest negative effect on GGY of any of the White Paper's proposals, with a loss of between £380 million and £710 million for online operators.⁸⁴ The checks will also affect horseracing, whose income comes partly from the Horserace Betting Levy, charged at 10% of bookmakers' gross profits above the first £500,000 they make on British racing. A reduction in online betting operators' GGY from racing will in turn reduce money raised through the levy.⁸⁵

31. Of all the proposals in the White Paper, financial risk checks drew the most concern in evidence to us from the gambling and racing industries; their main concern was that the checks risk deterring customers from gambling entirely, irrespective of whether what they spend is affordable, and particularly if the checks require the provision of payslips or other financial documents.⁸⁶ As noted in the previous chapter, many operators warned that rather than facing such checks, some customers will switch to gambling with unlicensed operators.⁸⁷ For example, Flutter Entertainment plc said it had found that 40% of its customers would not provide documents for a financial risk checks, and 75% of those customers would consider gambling with other operators, including unlicensed ones, to avoid the checks.⁸⁸ This was supported by evidence we received from individual gamblers and those representing them, which raised concern that the checks would represent an intrusion into their personal finances, or that they did not trust gambling operators to handle such sensitive data.⁸⁹ Some online gambling companies called for a cautious approach from the Commission in implementing the checks, with operators given adequate time to test the new system and scope to tailor responses to a check according to a customer's overall risk profile.⁹⁰

32. According to the White Paper, most online gambling customers will not face any financial risk check as their accounts will not pass the loss threshold at which the low-level checks are triggered.⁹¹ The Minister emphasised this point when appearing before us.⁹² In the first year of the new system, some six million online gambling accounts (about 20% of all accounts) will be subject to the low-level checks, and about 1 million accounts (3%) to the

82 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.222–225

83 *Ibid.*

84 *Ibid.*

85 *Ibid.*, pp.231–232

86 Betting and Gaming Council ([GAM0077](#) and [GAM0149](#)); Flutter Entertainment plc ([GAM0045](#) and [GAM0148](#)); Entain PLC ([GAM0050](#)); BV Gaming Ltd ([GAM0083](#)); Bally's Corporation ([GAM0088](#)); Mr Steve Donoghue (CEO/ Founder at [www.GamblingConsultant.co.uk](#) Limited) ([GAM0092](#)); Bet365 ([GAM0068](#))

87 *Ibid.*

88 Flutter Entertainment plc ([GAM0045](#))

89 Gamblers Consumer Forum ([GAM0126](#)); Professional Gamblers Association ([GAM0129](#)); Mr Steven Sargent ([GAM0106](#)); Mr Peter Smailes ([GAM0135](#)); Mr Neil Tolson ([GAM0119](#)); Mr Raymond Hodgkinson ([GAM0122](#)); Mr George ([GAM0134](#)); Mike Langdon ([GAM0139](#))

90 *Ibid.*; Bet365 ([GAM0151](#)); Kindred Group ([GAM0108](#))

91 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.222

92 [Q373](#)

enhanced checks.⁹³ The Government has also emphasised that even the enhanced checks will be “frictionless” in most cases, with no need for customers to submit documents and no or minimal interruption to their experience.⁹⁴ In oral evidence, Ben Dean, Director of Sport and Gambling at DCMS, acknowledged that customer consent, in the form of a tick-box, would likely be required before a check on an account could be conducted.⁹⁵ One gambling operator argued that asking for customer consent would mean the process no longer met the definition of being frictionless, and would carry the risk of deterring customers, discussed above.⁹⁶

33. For a minority of accounts—the White Paper estimates 20% of those subject to enhanced checks—frictionless checks will not be possible. Around half of these accounts will be subject to checks via open banking, and the remainder to checks for which customers will have to manually provide payslips or bank statements, something the White Paper acknowledges will be “disagreeable” for them.⁹⁷ By extrapolating the White Paper’s figures, we estimate the latter will comprise of roughly 100,000 customer accounts; online gamblers on average have three accounts, meaning the number of customers will likely be lower.⁹⁸ This is not an insignificant number, and it will be incumbent on the Government and the Commission to establish how financial risk checks can be made less “disagreeable” for these customers. Part of the answer will likely involve transparency on how customer’s financial information will be used and protected. The White Paper states that gambling operators will only be able to use data obtained through financial risk checks for customer protection, not commercial purposes, and that consumers’ financial lives (such as credit scores) will be unaffected by the checks.⁹⁹ This was reaffirmed by the Commission and the Government in oral evidence.¹⁰⁰ The Minister also said the new system of checks would be piloted if necessary.¹⁰¹

34. Evidence from campaign groups, charities and academics generally welcomed and supported the principle of financial risk checks.¹⁰² However, some argued that the proposed loss levels at which the checks will apply are too high to capture many individuals experiencing problem gambling at much lower levels of expenditure.¹⁰³ Dr Matthew Gaskell, Clinical Lead at the NHS Northern Gambling Service, highlighted potential limitations of the enhanced checks in identifying those experiencing gambling-related harms:

93 Gambling Commission, “[Summer 2023 consultation on proposed changes to Licence Conditions and Codes of Practice \(LCCP\), Remote Gambling and Software Technical Standards \(RTS\), and arrangements for Regulatory Panels](#)”, accessed 18 September 2023

94 [Qq373–374](#)

95 *Ibid.*

96 Gamesys Operations Ltd ([GAM0154](#))

97 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.222–225

98 Gambling Commission, “[Taking a more in-depth look at online gambling](#)”, accessed 17 September 2023

99 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.41

100 [Q299](#); [Q375](#)

101 [Q373](#)

102 [Q15](#); GambleAware ([GAM0152](#)); Gambling Related Harm All-Party Parliamentary Group ([GAM0153](#)); Peers for Gambling Reform ([GAM0125](#)); Associate Professor Sarah Page (Associate Professor Social Justice and Social Learning at Staffordshire University); Dr Lucy Pointon (Lecturer in Criminology at Staffordshire University); Associate Professor Jo Turner (Head of Department in the School of Justice, Security and Sustainability and Associate Professor Criminology at Staffordshire University); Sarah Plimley (Lecturer in Policing at Staffordshire University) ([GAM0142](#)); The Association of Police and Crime Commissioners ([GAM0157](#))

103 Christian Action Research and Education (CARE) ([GAM0118](#))

An analysis of our clinic data shows that £2,000 over 90 days could catch 58% of our service users but not the remaining 42%, who would not be caught, and that only 11% would lose £1,000 in 24 hours. Of course, there are caveats and that analysis does not necessarily generalise. However, there is an issue here about the extent to which these checks would prevent harm.¹⁰⁴

The proposed thresholds for triggering the checks are subject to consultation, and it will be important for the Government and Gambling Commission to consider evidence such as this.

35. Written evidence from GambleAware pointed to another potential limitation in the system of checks, in that they will be conducted by individual operators. This could mean, for example, that a customer with five gambling accounts could gamble five times more than the check thresholds by gambling with different operators.¹⁰⁵ The charity argued that, in the longer term, Government and the Commission should work with operators to conduct the checks through a single customer view mechanism, which would mean the results would be visible to all operators with whom a customer has an account.¹⁰⁶ The Gambling White Paper notes that trials of a single customer view system for high-risk gambling customers have been underway and, once satisfied, the Gambling Commission will consult on requiring all online operators to integrate with the system.¹⁰⁷

36. While we support the principle of financial risk checks, the Government must ensure they are minimally intrusive, and that customers' financial data are properly protected. The Government and the Gambling Commission must also establish what level of "friction" involved in these checks is acceptable for most online gambling customers. *The Gambling Commission should oversee a pilot of the new system of checks before it is fully implemented. This should aim to determine customers' willingness to be subject to the checks, and whether they apply at suitable thresholds.*

37. Financial risk checks will only be fully effective in preventing harm when they work across all online operators with whom a customer has an account. *In its response to this report, the Government and the Gambling Commission must set out progress in the work to develop a single customer view mechanism.*

Safer by design

38. As the White Paper acknowledges, protections such as financial risk checks, which focus on monitoring consumer gambling behaviour, are reactive, as interventions are only triggered when gambling operators detect signs of harm, which may be missed or not acted upon.¹⁰⁸ Another aspect of consumer protection therefore involves making gambling products safer. Various structural characteristics of gambling products can make them more appealing and immersive for users and encourage continued play, in some cases, to the point of causing harm. These include the speed of play (i.e., event frequency—the time interval between wagers); near-misses, where a customer believes they came close to winning; losses disguised as wins; skill and pseudo-skill elements to the game; light,

104 [Q213](#)

105 GambleAware ([GAM0152](#))

106 *Ibid.*

107 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.46

108 *Ibid.*, p.49

colour, and sound effects.¹⁰⁹ Speed of play in particular has been identified as a key factor, as studies have shown that faster play reduces players' ability to withhold from further gambling, due to increased arousal and diminished decision-making, and that these effects are not limited to those already experiencing problem gambling.¹¹⁰

39. Online slots games are a particularly fast, immersive form of gambling and have a particularly strong association with extreme gambling activity.¹¹¹ In light of this, in 2021, the Gambling Commission introduced new rules specifically concerning the structural characteristics online slots. These rules included restricting the spin speed (i.e., the event frequency) of online slots games to a minimum of 2.5 seconds, banning losses disguised as wins, and prohibiting other features which increase the intensity of play. Online slots games must now also display the money and time a user spends during a playing session.¹¹²

40. Currently, there are no comparable rules concerning the structural characteristics of online gambling products other than online slots. The White Paper proposes to address this, and the Gambling Commission is conducting a consultation on the design features of other online gambling products, such as roulette and other online casino games, with a view to reducing their speed and intensity and improving consumer understanding about game play. The Commission has proposed a five second minimum game speed and removing characteristics which mislead consumers or create dissociation from awareness of play.¹¹³ The regulatory aim, according to the White Paper, will be to develop a system of safer design standards consistent across multiple types of online gambling products.¹¹⁴

41. While welcoming the increased focus on the regulation of gambling products to reduce harm, some evidence that we received argued the Government should have gone further and developed a safety testing regime for online products.¹¹⁵ Under this, all current and new products would have to pass a safety assessment before they could be released on to the market. Such an assessment could involve testing and scoring a product against a series of harm indicators, with those scoring too highly not being approved.¹¹⁶ Testing products for safety would not be entirely novel for the regulator, as the Gambling Commission already has a testing regime for product randomness and fairness. However, the White Paper rejected this idea, on the basis that the parameters for measuring a product's potential to cause harm are not currently detailed enough to enable a proper

109 Garry Smith, David Hodgins and Robert J Williams, *Research and Measurement Issues in Gambling Studies*, (New York, 2007), Jonathan Parke and Mark Griffiths, "[The role of structural characteristics in gambling](#)", pp. 211–243, accessed 20 October 2023

110 Dr Andrew Harris (Senior Lecturer/Researcher, Psychology at Nottingham Trent University) ([GAM0026](#))

111 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.52–55

112 "[Gambling Commission announces package of changes which makes online games safer by design](#)", Gambling Commission press release, 2 February 2021

113 Gambling Commission, "[Summer 2023 consultation on proposed changes to Licence Conditions and Codes of Practice \(LCCP\), Remote Gambling and Software Technical Standards \(RTS\), and arrangements for Regulatory Panels](#)", accessed 18 September 2023

114 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.52

115 Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology/Visiting Professor of Gambling Studies at University of Birmingham/King's College London) ([GAM0109](#)); Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology at School of Psychology, University of Birmingham); Dr Heather Wardle (Adam Smith Lord Kelvin Reader in Social Sciences at School of Social and Political Sciences, University of Glasgow); Dr Matthew Gaskell (Head of Service at NHS Northern Gambling Service, Leeds and York Partnership NHS Foundation Trust) ([GAM0022](#))

116 House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), p.50

safety assessment. The Gambling Commission reaffirmed this in oral evidence, saying that testing for safety would be much more complex than for randomness and fairness.¹¹⁷ Despite this argument, there is at least one tool for assessing the risk of gambling product design features on the market already,¹¹⁸ a point we are surprised the White Paper does not discuss.

42. The Government states that there would be significant regulatory cost to testing every available online gambling product, and that testing risks giving consumers the impression that only “safe” products are available when all gambling carries some level of risk.¹¹⁹ The Gambling Commission noted that a product’s risk of harm can vary depending on the circumstances of the person playing it, and those experiencing problems with their gambling also tend to gamble with multiple products, meaning the risk profile of a single product may be less relevant.¹²⁰ While all this may be the case, some gambling products are more associated with harm than others, and this is at least in part due to certain design features of these products. At the very least, these facts should be better communicated to gambling consumers. The White Paper proposes a new, Government-led approach to safer gambling messaging (which we note further in Chapter 5), which encompasses information provided to gambling consumers at the point of purchase.

43. When we put the idea of a product safety testing regime to representatives of the gambling industry, they were reluctant to engage, and expressed caution about how product “safety” should be defined.¹²¹ But they did suggest that in principle operators would be willing to make anonymised real play data available to enable independent research on the safety of products.¹²² Given the White Paper’s argument that the factors affecting product safety are not fully understood, and given the online gambling sector is, in the words of the White Paper, “ever innovating”¹²³ such research should be a priority.

44. We support the White Paper’s proposals to make online gambling products safer by design. Improving understanding of what affects products’ risk of harm should be a priority, and Government should keep its position on a safety testing regime under review in light of further research. *In the short term, as part of its work on safer gambling messaging, we recommend that the Government consider what point-of-sale information should be provided to customers about the risk of specific products and their design features.*

Stake limits

45. In addition to speed of play, the amount of money that can be staked per wager on a gambling product can be significant in affecting its potential to cause harm.¹²⁴ Though it is possible that some players will win more than they lose, the house edge means that, over multiple wagers, most will not. And gambling products which are entirely chance-based (as opposed to those which involve an element of player skill) are mathematically weighted

117 [Q327](#) [Sarah Gardner]

118 See, for example: <https://www.gamgard.com/>

119 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.50

120 Ibid [Andrew Rhodes]; [Q330](#)

121 [Qq118–123](#)

122 Ibid.

123 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.30

124 Ibid, p.52

so that, over time, players will lose more money than wagered. Therefore, alongside the speed of play, the stake determines how much money a player will likely lose within a given timeframe. In recognition of this, electronic gaming machines in land-based gambling venues are subject to stake and prize limits set out in legislation, tiered according to the category of machine. For example, Category B1 machines, permitted only in casinos, have a stake limit of £5 (the highest of any permitted machine category); Category B3 machines, which are available in many types of land-based venue, have a maximum stake of £2. Category B2 machines, also known as fixed-odds betting terminals (FOBTs), another type of gaming machine common in betting shops, now also have a stake limit of £2. In 2019, DCMS lowered the maximum stake on FOBTs from £100 following widespread concern about the relationship between these machines and problem gambling.¹²⁵ There are no statutory limits on the amount of money that can be staked on any online gambling product, despite many being otherwise similar to games available on electronic gaming machines.

46. As noted in the previous section, online slots are associated with extreme gambling activity more than any other gambling product. They have the highest average losses per active customer, and the gross gambling yield (GGY) derived from slots is concentrated in a minority of very heavy spenders, with one percent of customer accounts providing over 40% of GGY. Online slots were the most commonly used product among patients in the National Gambling Support Network in 2021–22¹²⁶ and some gambling operators have voluntarily introduced stake limits for slot products.¹²⁷ The White Paper proposes to add another level of consumer protection for online slots games by introducing a statutory stake limit of between £2 and £15, subject to a DCMS-led consultation launched in July this year. For 18–24-year-olds, DCMS is consulting on a preferred stake limit of £2.¹²⁸ We discuss the specific protections proposed for this age group in Chapter 4.

47. The Government has said that the account-based nature of online gambling, which allows operators to develop a risk profile of players, may justify a higher stake limit for online slots than for land-based gaming machines.¹²⁹ Indeed, on the same basis many gambling operators have argued for a tiered system of stake limits, where the limit would be adjusted for each individual player according to their risk profile.¹³⁰ The White Paper ruled this out on grounds of feasibility, including the need for primary legislation to implement such a measure.¹³¹

48. A blanket limit on online slot stakes will result in a loss of income for online operators, with the Government’s consultation impact assessment predicting an annual direct net cost to the industry of between £26.9 million (for a £15 stake limit and no specific limit for 18–24-year-olds) and £266 million (for a flat £2 stake limit).¹³² Online slots GGY was

125 [“Government to cut Fixed Odds Betting Terminals to maximum stake from £100 to £2”](#), Department for Culture, Media and Sport press release, 17 May 2018

126 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, pp.52–53

127 Flutter Entertainment plc ([GAM0045](#))

128 Department for Culture, Media and Sport, [“Consultation on proposals for a maximum stake limit for online slot games”](#), accessed 26 September 2023.

129 Ibid.

130 Kindred Group ([GAM0057](#)); Bet365 ([GAM0068](#)); Kindred Group ([GAM0108](#)); Q98

131 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, pp.56

132 Department for Culture, Media and Sport, [Online Slots Stake Limit Impact Assessment](#) (18 July 2023), p.24

£3 billion in 2021/2022, almost half of that of the online sector as a whole.¹³³ In practice, 99% of stakes used by players are £5 or under, (with 96% £2 or under). Some evidence to us argued for a flat £2 stake limit for online slots, matching Category B2 and B3 machines that are widely available across land-based venues.¹³⁴ Online slots can be used 24 hours a day and via smartphone, whereas access to electronic gaming machines is restricted by the opening times and location of gambling venues, and the number of machines in each.¹³⁵

49. The high degree of accessibility of online slots negates the additional protection provided by account-based play. Setting a limit for online slots at the same level as Category B gaming machines, at between £2 and £5, takes account of the risk of harm and will impact only around 1% of gamblers. We recommend that stake limits for online slots should match those for electronic gaming machines in land-based venues and not exceed £5.

Consumer tools

50. The White Paper proposes to strengthen account-based tools online gamblers can use to help them control and better understand their gambling. These include activity statements, financial controls such as deposit limits, and time-outs, which a customer can use to temporarily block access to their own account. All licensed online operators are required to provide customers with these tools. But, as the White Paper notes, uptake is low: Gambling Commission data suggests financial limits are used only by 11% of online gamblers, and only 5% use time outs.¹³⁶ How these tools are presented and structured can also influence their utility. For example, GambleAware cited research showing that default deposit limit options offered by some operators are high—up to £100,000 in some cases—and clearly well beyond the means of the vast majority of the population.¹³⁷ The Gambling Commission will consult on how these player-centric tools can be strengthened and their uptake improved. This will include consideration of whether deposit limits should be set by default and require a customer to opt-out, rather than having to opt-in. This was argued for in some submissions we received.¹³⁸ In oral evidence the BGC said the industry would be “very open” to the idea.¹³⁹

51. We welcome further work on proactive tools. Operators should be compelled to proactively encourage customers to set online deposit limits. Where potential harm of financial vulnerability is indicated, online deposit limits should be mandatory.

133 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, pp.226; Gambling Commission, “[Industry Statistics—November 2022](#)”, accessed 23 September 2023

134 All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); Peers for Gambling Reform ([GAM0072](#)); Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology/Visiting Professor of Gambling Studies at University of Birmingham/King’s College London) ([GAM0109](#)); Greater Manchester Combined Authority ([GAM0150](#)); GambleAware ([GAM0152](#)); Mr Derek Webb ([GAM0156](#)); The Association of Police and Crime Commissioners ([GAM0157](#)); Northern Ireland Assembly All Party Group on Reducing Harm Related to Gambling ([GAM0162](#)); Mission and Public Affairs Council, Church of England ([GAM0033](#)); Tackling Gambling Stigma ([GAM0078](#))

135 Tackling Gambling Stigma ([GAM0078](#)); [Q224](#)

136 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, p.57

137 GambleAware ([GAM0047](#))

138 Tackling Gambling Stigma ([GAM0078](#)); Money and Mental Health Policy Institute ([GAM0132](#)); Gambling Research Group, Bournemouth University ([GAM0117](#))

139 [Q97](#) [Wes Himes]

4 Children and young adults

52. One of the three licensing objectives under the Gambling Act 2005 is protecting children from being harmed or exploited by gambling.¹⁴⁰ Regulation has sought to do so by restricting children's access; the legal age to participate in nearly all forms of licensed gambling in Britain is 18, and it is an offence under the 2005 Act to offer gambling products that are intended only for adults to children. There are a few exceptions. Category D gaming machines (such as penny falls or crane grabbers) have no minimum age for play, though members of the main trade association, Bacta, voluntarily restrict play to adults on all machines which pay out cash.¹⁴¹ Football pools and society lotteries have a statutory minimum age of 16 years, although most operators voluntarily apply an age limit of 18. Until recently, the National Lottery had a minimum age of 16, but it was increased to 18 in 2021 following a Government consultation.¹⁴² All licensed gambling operators are required to have age verification policies and procedures. For online gambling, age verification is required before an account can be opened.¹⁴³

53. Despite legal and technical restrictions, a minority of children gamble in some form. According to the Gambling Commission's *Young People and Gambling 2023* survey, 26% of 11–17 year-olds had spent their own money on gambling in the past year.¹⁴⁴ The longer-term trend is downwards: the annual rate was 31% in 2022, 37% in 2020, 36% in 2019, and 39% in 2018,¹⁴⁵ and in most cases gambling participation by children is legal or does not feature age restricted products. In the Commission's 2023 survey, the activities with the highest participation among children were arcade gaming machines (19%), placing a bet with friends or family (11%), and playing cards with friends or family for money (5%). Much smaller numbers took part in age restricted activities: the rates of participation in online betting, playing National Lottery scratchcards, and betting on eSports were all 1%. The Commission identified 0.7% of 11–17 year-olds as problem gamblers and 1.5% as at-risk gamblers.¹⁴⁶ Past data from the Commission indicates that the problem gambling and at-risk rate of 11–17-year-olds have increased in the last decade, despite the decline in overall gambling participation; however, changes to the methodology of the Commission's annual surveys makes year-to-year comparison difficult.¹⁴⁷

54. The Gambling White Paper states that protecting children from gambling harm is a Government priority.¹⁴⁸ Its proposals focus on increasing the statutory minimum age for those gambling activities still permitted at 16–17 to 18 years old. The Government also aims to strengthen age verification in land-based gambling venues, noting that age verification in the online sector is already strong. The Gambling Commission will consult on requiring staff in land-based venues to check the age of any customer who appears to

140 Gambling Act 2005, [Section 1](#)

141 Bacta ([GAM0063](#))

142 Department for Digital, Culture, Media and Sport, "[Government response to the consultation on the minimum age to play National Lottery games](#)", accessed 14 November 2023

143 Gambling Commission, "[Age, ID and financial verification](#)", accessed 14 November 2023

144 Gambling Commission, "[Young People and Gambling 2023](#)", accessed 20 November 2023

145 Ibid. Data from 2021 is unavailable.

146 Ibid.

147 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.156. Until 2023, the survey was inclusive of 11–16 year olds only.

148 Ibid, p.152

be under the age of 25, AKA ‘Think 25’, rather than the current requirement of ‘Think 21’.¹⁴⁹ For gaming machines in pubs and other alcohol-licensed venues, the Government will legislate to introduce a ‘Think 21’ requirement.

55. Evidence to us welcomed these measures and did not comment on them in detail, though there was some concern regarding the timescale for their implementation as they will be either voluntarily undertaken by operators or subject to Parliamentary time.¹⁵⁰ The main criticism of the Government’s approach to protecting children from gambling harm focused on its approach to gambling advertising, with protecting children from gambling harm given as one of the main justifications for more extensive restrictions than proposed in the White Paper.¹⁵¹ We examine gambling marketing and advertising fully in the next chapter. Many submissions also identified a risk to children in the increasing overlap between video gaming and gambling,¹⁵² which we discuss below.

Loot boxes and gambling-like features in video games

56. Much of the concern expressed in written evidence about gambling among children and young people focused on loot boxes in video games. These are items in videos games which provide players with randomised rewards of uncertain value.¹⁵³ They often appear as chests, crates, or card packs. Rewards inside may include virtual items, such as tools, weapons, or cosmetic outfits (the latter often referred to as “skins”), or characters with particular skills, all of which will be of variable benefit within the game. Loot boxes may be accessed through gameplay or purchased with in-game items or virtual currencies. Some can also be bought with real-world money.¹⁵⁴ In-game purchases are common in video games; the unique feature of loot boxes is the chance mechanism. Many academics, charities and other organisations have said that the randomness of loot box reward is akin to gambling products, especially when they can be purchased with real-world money.¹⁵⁵

149 Ibid, p.169

150 GambleAware ([GAM0152](#))

151 Gambling Related Harm All-Party Parliamentary Group ([GAM0153](#)); Peers for Gambling Reform ([GAM0125](#)); GambleAware ([GAM0152](#)); YGAM ([GAM0138](#)); Christian Action Research and Education (CARE) ([GAM0118](#)); Greater Manchester Combined Authority ([GAM0150](#)); The Association of Police and Crime Commissioners ([GAM0157](#))

152 Mr Leon Y. Xiao (PhD Fellow at IT University of Copenhagen) ([GAM0025](#)); Mission and Public Affairs Council, Church of England ([GAM0033](#)); GamCare ([GAM0038](#)); Parent Zone ([GAM0042](#) and [GAM0145](#)); Association of Police and Crime Commissioners ([GAM0056](#)); Money and Mental Health Policy Institute ([GAM0058](#)); CARE (Christian Action Research and Education) ([GAM0061](#)); Dr Heather Wardle (Adam Smith Lord Kelvin Reader in Social Sciences at University of Glasgow); Professor Gerda Reith (Professor of Social Sciences at University of Glasgow); Dr Chris Bunn (Senior Lecturer at University of Glasgow); Dr Fiona Dobbie (Senior Lecturer at University of Edinburgh) ([GAM0062](#)); Bacta ([GAM0063](#)); Gambling Research Group, Bournemouth University ([GAM0065](#)); Gambling with Lives ([GAM0067](#)); YGAM ([GAM0070](#)); All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); Peers for Gambling Reform ([GAM0072](#)); BV Gaming Ltd ([GAM0083](#)); The Christian Institute ([GAM0085](#)); Dr David Zendle (Lecturer at University of York) ([GAM0098](#)); Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology/Visiting Professor of Gambling Studies at University of Birmingham/King’s College London) ([GAM0109](#))

153 David Zendle, Rachel Meyer, Stuart Waters, Paul Cairns, “*The prevalence of loot boxes in mobile and desktop games*”, *Addiction*, vol 115 (January 202), pp.1768–1772

154 *Loot boxes in video games*, Number [8498](#), House of Common Library, October 2023, p.6

155 Ibid.

This had led to concerns about the possible role of loot boxes in encouraging children to gamble.¹⁵⁶ Some 93% of children in the UK play video games, and as many as 40% have made a loot box purchase.¹⁵⁷

57. In 2019 our predecessor Committee concluded, in its report on immersive and addictive technologies, that loot boxes which can be bought with real-world money constitute gambling, and recommended the Government bring forward regulations to specify this.¹⁵⁸ This was echoed by the report of the House of Lords Select Committee on the Social and Economic Impact of the Gambling Industry.¹⁵⁹ Though the Gambling Commission has expressed concern about loot boxes, its position is that it does not have the power to regulate them as they are not within the definition of gambling under the Gambling Act 2005. The Act sets out that three types of activity constitute gambling: betting, gaming, and lotteries.¹⁶⁰ Gaming is defined as “playing a game of chance for a prize”, with “prize” meaning “money or money’s worth”.¹⁶¹ The Commission has said that if items obtained from loot boxes are confined for use within a video game and cannot be cashed out for real-world money, loot boxes are unlikely to be considered as a licensable gambling activity.¹⁶²

58. In 2020, alongside its Review of the Gambling Act 2005, the Government launched a call for evidence into loot boxes in video games.¹⁶³ This aimed to understand the impact of loot boxes and any evidence of harms, and the effectiveness of existing regulation. The Government’s response, published in July 2022, identified potential mental health, financial, and gambling-related harms associated with loot boxes, with the risks likely to be higher for children and young people.¹⁶⁴ But it stated that academic research has yet to establish a causal link between loot box spending and problem gambling behaviour. It ruled out extending the remit of the Gambling Commission to cover loot boxes, citing the fact that loot box prizes cannot usually be directly cashed out of a video game—the same distinction made by the Commission—and the practical difficulties of extending the regulator’s remit to cover video games.¹⁶⁵ In its response to its call for evidence, DCMS said it would convene a technical working group to facilitate video game industry-led regulation of loot boxes. The principles underpinning this were that children should be unable to purchase loot boxes without parental consent, and all players should be aware of and have access to spending controls and transparent information to support safe and

156 Ibid.

157 James Close and Joanna Lloyd, “[Lifting the Lid on Loot-Boxes: Chance-Based Purchases in Video Games and the Convergence of Gaming and Gambling](#)”, GambleAware, April 2021, p.9

158 Fifteenth report of the Digital, Culture, Media and Sport Committee, *Immersive and addictive technologies*, [HC 1846](#) (2017–19), p.29

159 House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), p.115

160 Gambling Act 2005, [Section 3](#)

161 Ibid. [Section 6](#)

162 “[Loot boxes in video games](#)”, Gambling Commission press release, 24 November 2017

163 Department for Digital, Culture, Media and Sport, “[Loot Boxes in Video Games - Call for Evidence](#)”, accessed 20 November 2023

164 Department for Digital, Culture, Media and Sport, “[Government response to the call for evidence on loot boxes in video games](#)”, accessed 20 November 2023

165 Ibid.

responsible gameplay.¹⁶⁶ Separately, some video game companies have been exploring measures to improve loot box transparency; in 2021, Electronic Arts announced a trial of loot boxes in FIFA games for which showed their contents prior to players opening them.¹⁶⁷

59. In May this year, DCMS published its Video Games Research Framework, which aims to facilitate and encourage research into video games, setting out priority topics, research standards and methodologies, and highlighting ethical data capture and sharing practices.¹⁶⁸ In July, Ukie, the video games industry trade body, published guidance on loot boxes for its members.¹⁶⁹ This sets out 11 principles, including that video games developers should make available technological controls to restrict anyone under the age of 18 from acquiring a loot box without parental knowledge or consent; and that loot boxes should be designed and presented in an easily understandable manner, with clear probability disclosures.¹⁷⁰ Ukie's announcement stated that it would work with the Government and other relevant stakeholders to measure the effectiveness of these principles over the next twelve months.¹⁷¹ We look forward to reviewing the outcomes of this work

60. Our calls for evidence preceded publication of Ukie's principles and guidance on loot boxes, meaning responses to our inquiry did not comment on them specifically. But, some evidence expressed general scepticism about the level of compliance that would follow from industry self-regulation.¹⁷² Leon Y. Xiao, PhD Fellow at the IT University of Copenhagen, cited examples of poor compliance by iPhone and Android games with industry self-regulation on loot boxes on the Apple App Store and Google Play Store as demonstrative of the possible limitations of loot boxes regulation lacking legal enforceability.¹⁷³ DCMS has stated that it will keep its position on possible legislative options under review, according to the effectiveness of the industry-led measures, which will be implemented over the next year.¹⁷⁴ We note that, if the Government is not in a position to review the effectiveness of Ukie's guidance until summer next year, the time remaining in the current Parliament will make any legislative options difficult to deliver.

61. Some evidence identified loot boxes as only the most prominent example of a wider convergence between video gaming and gambling.¹⁷⁵ Loot box rewards, particularly skins, are now used as wagers in online casino games and in betting on Esports,¹⁷⁶ the audience for which largely consists of children and young adults.¹⁷⁷ Separate from loot boxes, Dr David Zendle, Lecturer in Computer Science at the University of York, highlighted the example of social casino games. These are a specific type of game, often playable on smartphones, which simulate gambling activities and products. Some incorporate paid

166 Department for Culture, Media and Sport, "[Loot boxes in video games: update on improvements to industry-led protections](#)", accessed 20 November 2023

167 "EA is testing transparent lockboxes in a FIFA game", RIPROAR, 21 June 2021

168 Department for Culture, Media and Sport, "[Video Games Research Framework](#)", 30 May 2023

169 Ukie, "[New Principles and Guidance on Paid Loot Boxes](#)", accessed 20 November 2023

170 Ibid.

171 Ibid.

172 All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); Mr Leon Y. Xiao (PhD Fellow at IT University of Copenhagen) ([GAM0025](#))

173 Mr Leon Y. Xiao (PhD Fellow at IT University of Copenhagen) ([GAM0025](#))

174 Department for Culture, Media and Sport, "[Loot boxes in video games: update on improvements to industry-led protections](#)", accessed 20 November 2023

175 Peers for Gambling Reform ([GAM0072](#)); Dr David Zendle ([GAM0098](#))

176 Parent Zone ([GAM0042](#)); CARE (Christian Action Research and Education) ([GAM0061](#)); Mission and Public Affairs Council, Church of England ([GAM0033](#))

177 Parent Zone ([GAM0042](#)); All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); Bristol Hub for Gambling Harms Research, University of Bristol ([GAM0075](#))

slot machines into the wider gameplay experience, while others are essentially facsimiles of gambling products, with players able to pay money to purchase in-game credits or chips. Dr Zendle cited longitudinal research showing that adults and adolescents who play social casino games are more likely to go on to engage in traditional forms of gambling, and that spending on social casino games is linked to gambling problems.¹⁷⁸ However, as players cannot exchange their (virtual) winnings for real-world money, social casino games are not defined as gambling products but as a type of video game and are widely available to children.¹⁷⁹

62. Social casino products are the latest example of the convergence between video games and gambling. Though it has responded to the specific issue of loot boxes, the Government must address this wider trend to ensure harms, particularly to children, are prevented. It will be more difficult to do so if gambling continues to be defined solely on the basis of whether a prize from a game can be cashed out. The Government should review the case for banning children’s access to social casino games.

Protections for young adults

63. The White Paper identifies that young adults aged 18–24 are at greater risk of gambling harm than older adults and cites several potential reasons for this. Young adults may still be developing impulse control and decision making, and have a higher risk tolerance, which may be reflected in their gambling behaviour. Gaining access to commercial gambling from the age of 18 also coincides with important changes in young people’s lives, such as living independently and managing money for the first time. There may also be social pressure on young adults to engage in riskier gambling behaviour.¹⁸⁰ In a 2018 analysis, young adults were found to be at most risk of falling into problem gambling around the ages of 20 and 21.¹⁸¹ Due to these factors, the White Paper includes some new protections for 18–24-year-olds specifically. The Government proposes that the monetary loss thresholds triggering an enhanced financial risk check (discussed in Chapter 3) will be lower for 18–24-year-olds than adults aged 25 and over, being triggered after losses totalling £500 in 24 hours and £1000 in a rolling 90-day period, half the level proposed for older adults. In addition, in its consultation on stake limits for online slots, the Government included a preferred option of a limit of £2 for 18–24-year-olds.¹⁸²

64. In oral evidence, the Betting and Gaming Council (BGC) welcomed having an additional level of protection for younger adults.¹⁸³ Michael Dugher, CEO of the BGC, noted that the measures will not restrict young people’s access to gambling but merely give them additional safeguards.¹⁸⁴ Evidence from YGAM, a charity focused on safeguarding children and young people from gambling harms, also welcomed the proposal but questioned whether the proposed thresholds for financial risk checks for 18–24 year-olds were too high, citing the White Paper’s own figure that 73% of adults in that age range

178 Dr David Zendle (Lecturer at University of York) ([GAM0098](#))

179 Ibid.

180 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.170

181 David Forrest and Ian G. McHale, *Gambling and problem gambling among young adults: insights from a longitudinal study of parents and children*, University of Liverpool Management School (August 2018)

182 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.56

183 [Qq106–107](#)

184 [Q107](#)

have less than £500 discretionary income per month.¹⁸⁵ Other evidence to us suggested that having age-based stake limits may lead some younger adults to be dishonest about their age in creating an online gambling account, so as to be able to stake higher amounts.¹⁸⁶ The White Paper states that age verification in the online sector is already effective, but we agree this possibility is something for the Government and regulator to be mindful of.

65. We support the proposed introduction of enhanced online gambling protections for young adults aged 18–24. *The Government, Gambling Commission, and gambling operators must ensure these measures do not unintentionally lead to more adults in this age group giving a higher age at account-creation.*

185 YGAM ([GAM0138](#))

186 *Ibid*; Mr Steven Sargent ([GAM0106](#))

5 Gambling advertising

Current regulation

66. Among the most significant changes in gambling since the 2005 Act came into force has been the significant growth in the volume of gambling advertising. This has partly been the result of the liberalised regulatory regime brought by the Act, which permitted gambling operators to advertise across all media; previously, only lotteries, bingo, and football pools were permitted to advertise on TV. In addition, gambling advertising has been able to expand as the opportunities to advertise online have increased. Online advertising now accounts for more than 80% of gambling operators' advertising spending.¹⁸⁷ A 2017 estimate put total annual spending by UK gambling companies at more than £1.5 billion—an increase in just three years of 56% from £1 billion in 2014. It is likely that the figure has increased further since.¹⁸⁸ Total direct online marketing was £747 million, 48% of total spending. TV gambling advertising was £234 million (15%), and social media spending was 149 million (10%). The total spend on sponsorship was £60 million.¹⁸⁹

67. Both adults and children report high exposure to gambling adverts: research by the Gambling Commission found that 60% of adults had seen at least one gambling advert in the past week.¹⁹⁰ In separate research by Ipsos Mori, 85% of 11–24-year-olds reported seeing gambling adverts on TV, 70% in betting shops windows on the high street, and 66% on social media channels.¹⁹¹ Women are less likely than men to have recently seen gambling advertising,¹⁹² although recent research from GambleAware has identified industry practices and advertising directed at women, including “gendered advertising, including using female celebrity endorsement, or targeted campaigns aimed at different groups of women.”¹⁹³ The research also highlighted specific marketing aimed at women for online bingo and casino sites, which focused on gambling as an enjoyable activity, encouraging gamblers to “treat yourself”, and raised the frequency of targeted gambling advertising during daytime television and in the sponsorship of soaps.¹⁹⁴

68. The Advertising Standards Authority (ASA) regulates gambling advertising across all media. Licence conditions set by Gambling Commission require gambling operators to comply with the Advertising Codes which the ASA administers: the Broadcast Committee of Advertising Practice (BCAP) Code, which applies to all broadcast advertising; and the Committee of Advertising (CAP) Code, which applies to non-broadcast adverts, sales promotions, and direct marketing, including in online settings. These codes require that gambling adverts do not:

187 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, p.73

188 “Gambling companies spend £1.2 billion marketing online, five times more than on television ads”, GambleAware press release, 24 November 2018

189 Ibid.

190 Gambling Commission, “Understanding how consumer engaged with gambling advertising in 2020”, accessed 22 November 2023

191 Ipsos MORI on behalf of GambleAware, “Final Synthesis Report, The effect of gambling marketing and advertising on children, young people and vulnerable adults”, March 2020, p.34

192 Gambling Commission, *Understanding how consumers engaged with gambling advertising in 2020*, accessed 22 November 2023

193 “New research sheds light on drivers for gambling and associated harms amongst women in Britain”, GambleAware press release, 26 May 2023

194 IFF Research, “Building Knowledge of Women’s Lived Experience of Gambling and Gambling Harms Across Great Britain, Final Report”, April 2023, pp.38–39

- portray gambling behaviour that is irresponsible or could lead to harm.
- suggest that gambling can enhance personal qualities, be a solution to financial difficulties, or be an escape from personal problems.
- be directed at under-18s or placed in media for under-18s.
- be of strong appeal to children or young persons, especially by reflecting or being associated with youth culture.
- feature anyone gambling or playing a significant role in the advert if they are or appear to be under 25-years-old.

Adverts which breach the Codes must be amended or withdrawn and the ASA can refer advertisers to the Gambling Commission and broadcasters to Ofcom if there is serious or repeated infringement. The specific gambling sections in the Codes supplement general provisions requiring that adverts do not mislead, harm, or cause serious or widespread offence. Gambling sponsorship is not within the ASA's remit, except when it is featured in adverts.¹⁹⁵

69. The gambling industry has adopted some voluntary measures to limit its advertising in specific contexts. These are set out in the Industry Code for Socially Responsible Advertising, which all members of the Betting and Gaming Council are expected to adhere to. The Code bans broadcast gambling advertising before 9pm (except for bingo and lotteries), as well as during live sport televised before 9pm from five minutes before it starts until five minutes after it has ended. This is known as the “whistle to whistle” ban. Horseracing and greyhound racing are exempt.¹⁹⁶ The Code also requires operators to use adtech to prevent online adverts being targeted to those under the age of 25 where age verification is not in place, the inclusion of safer gambling messages in gambling adverts, and for 20% of advertising to be devoted to safer gambling messaging.¹⁹⁷ The seventh edition of the code, due to be published in December 2023, strengthens several of these provisions.¹⁹⁸

70. Some aspects of gambling advertising regulation have been strengthened in recent years. In 2020, the Gambling Commission introduced new guidance for gambling operators regarding VIP schemes, which offer special promotions, bonuses, and other inducements to customers who gamble particularly large sums. Concerns have been raised for several years, repeated in evidence to us, that VIP schemes can encourage unaffordable spending and problem gambling.¹⁹⁹ The new guidance set out various checks for signs of harm to be conducted by operators before awarding customers VIP status. The Commission estimates that the number of VIP customers has fallen by 90% since these measures were introduced.²⁰⁰ In 2022, in light of the IPSOS Mori research cited above, CAP made changes to the advertising codes for gambling. This included prohibiting content of “strong appeal

195 ASA System ([GAM0060](#))

196 Industry Group for Responsible Gambling, [Gambling Industry Code for Responsible Advertising](#), 6th edition, para 37–40

197 Ibid, paras 21–30.

198 [“BGC strengthens ads rules to further protect under 18s”](#), Betting and Gaming Council press release, 4 September 2023

199 House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), pp.90–95; All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); GamCare ([GAM0038](#)); Samaritans ([GAM0034](#))

200 Gambling Commission, [Advice to Government - Review of the Gambling Act 2005](#), April 2023, p.4

to children”, upgrading from the previous restriction of content that appeals unduly to children, and adding further restriction to content which downplays the risks or overstates the level of skill involved in betting.

The White Paper’s Approach

71. Direct marketing and promotional offers are the focus of the White Paper’s proposed reforms to advertising. The Government identifies these as the forms of advertising most likely to impact an individual’s gambling behaviour, such as by prompting them to gamble more money than they planned or to resume gambling after taking a break from the activity. It notes a worrying trend whereby those at the greatest risk of gambling harm have the highest exposure to bonus offers and direct marketing, which is likely due to gambling operators targeting more engaged customers, and engaged gamblers being on a greater number of mailing lists.²⁰¹

72. The Gambling Commission has launched a consultation on bonus offers, free bets, and other incentives to gamble to ensure they are constructed and targeted in a socially responsible way.²⁰² This review will include the conditions attached to bonuses and the time frames in which they must be claimed. The Commission will also strengthen consumer choice over direct marketing, with opt-in consent made clearer, including a proposal that there should be no “cross-selling” of products (for example, offering free online slots spins to sports bettors) without customers opting-in. In addition, the Government will assume responsibility for the development of safer gambling messaging, currently developed either by GambleAware or the gambling industry.²⁰³ This messaging encompasses information provided to gambling customers at the point of using products, as well as messaging embedded in advertising and wider awareness campaigns about the risks of gambling. The White Paper also sets out the Government’s desire for more online platforms to provide one-click opt-out from gambling content and target algorithmic recommendations of gambling content away from children, though it contains no proposals to mandate either measure.²⁰⁴

73. The White Paper’s overall approach to gambling advertising was the most frequent source of criticism in non-gambling industry evidence to us. Multiple submissions argued that gambling advertising plays a key role in causing gambling harm, by encouraging gambling participation and normalising gambling as an activity, including for children. In particular, the risks associated with cross-selling products were highlighted by several witnesses, who described how the practice can serve to move customers from playing lower risk gambling activities to more intensive products, such as online slots, thereby causing a rapid escalation in their gambling and a possible loss of control.²⁰⁵ Though the White Paper proposes measures addressing this practice specifically, it was argued that the Government should have proposed much more extensive restrictions. Some evidence argued for a total ban on gambling advertising or a reversion to pre-2005 Act rules, when

201 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.81

202 “[Views wanted on proposals to make gambling safer](#)”, Gambling Commission press release, 29 November 2023

203 *Ibid*, pp.98–103

204 *Ibid*, p.93

205 [Q201](#) [Dr Matthew Gaskell]; [Q206](#); [Qq239–241](#)

broadcast advertising was permitted for only a small number of products.²⁰⁶ Other, less extensive proposals put forward included a total ban on VIP schemes, or indeed on all direct marketing and other inducements to gamble; banning gambling advertising on websites accessed by children; and ending all gambling sponsorship and advertising in sports, including in e-Sports.²⁰⁷

74. In its advice to the Gambling Act Review, the Gambling Commission suggested a somewhat more stringent approach to advertising than that adopted in the White Paper. It recommended that the Government should require social media platforms to do more to prevent children's exposure to gambling content and introduce clear, one-click opt-outs from gambling advertising. In addition, it said the Government should consider a ban on shirt sponsorship in some elite sports where there is a significant following of under-18s and limit the number of gambling adverts promoted in elite sports grounds.²⁰⁸ The case for a more fundamental change in approach to gambling advertising regulation, involving blanket bans in certain contexts or a complete ban, is acknowledged in the White Paper but ruled out on the basis of there being no evidence for a direct causal link between advertising and gambling harm.²⁰⁹ When appearing before us, the Minister emphasised that the Government had taken an "evidence-based" approach towards gambling advertising.²¹⁰

75. As with other aspects of gambling, the effect of advertising and its role in gambling harm is under-researched and not fully understood. That gambling advertising has an impact on people's behaviour is intuitive; as one witness said, it would not make sense for the gambling industry to spend the amount it does if advertising does not play some role in increasing the size or engagement of its customer base.²¹¹ The White Paper notes that the rates of problem gambling and overall gambling participation have decreased in the period in which gambling advertising has expanded.²¹² However, high-level trends such as these do not reveal the specific effect of advertising: gambling participation or problem gambling may have been lower still if gambling advertising was less prevalent. The current evidence base on the effect of gambling advertising lacks longitudinal research and largely consists of cross-sectional surveys of people's self-reported exposure to gambling adverts and their resulting attitudes and behaviour, or experimental studies involving people already at increased risk of gambling harm.²¹³ But, as the White Paper acknowledges, what research there is indicates a causal relationship between increased exposure to gambling advertising and more positive attitudes to gambling, greater intention to gamble, and

206 Gambling with Lives ([GAM0067](#)); Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology at School of Psychology, University of Birmingham); Dr Heather Wardle (Adam Smith Lord Kelvin Reader in Social Sciences at School of Social and Political Sciences, University of Glasgow); Dr Matthew Gaskell (Head of Service at NHS Northern Gambling Service, Leeds and York Partnership NHS Foundation Trust) ([GAM0022](#))

207 GamCare ([GAM0038](#)); GambleAware ([GAM0047](#) and [GAM0152](#)); Peers for Gambling Reform ([GAM0072](#) and [GAM0125](#)); All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#) and [GAM0153](#)); Mr Matt Zarb-Cousin ([GAM0053](#)); Bristol Hub for Gambling Harms Research, University of Bristol ([GAM0075](#)); Tackling Gambling Stigma ([GAM0078](#)); Christian Action Research and Education (CARE) ([GAM0061](#) and [GAM0118](#)); Betknowmore UK ([GAM0107](#))

208 Gambling Commission, [Advice to Government - Review of the Gambling Act 2005](#), April 2023, pp.40–49

209 Department for Culture, Media and Sport, [High Stakes: Gambling Reform for the Digital Age](#), [CP 835](#), April 2023, pp.78–80

210 [Q365](#)

211 [Q118](#) [Dr James Noyes]

212 Department for Culture, Media and Sport, [High Stakes: Gambling Reform for the Digital Age](#), [CP 835](#), April 2023, p.79

213 E. McGrane et al. "What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature", [Public Health](#), volume 215 (February 2023), pp.124–130

increased gambling participation.²¹⁴ This applies at both the individual and population level and the effect is more pronounced for children and young people and those already vulnerable to gambling harm.²¹⁵

76. Further research may yet establish direct causation between gambling advertising and harm, but some evidence to us argued that this would always be challenging given the difficulty of controlling for the numerous variables involved and that Government would therefore always have to approach the issue with imperfect knowledge.²¹⁶ Professor Heather Wardle, Professor of Gambling Research and Policy at the University of Glasgow, argued that, in effectively requiring proof of causality, the Government was setting the bar for greater action too high:

It is also insisting on a standard of causal evidence that outside of biomedical sciences nobody else believes you should have. We all know when there are environmental exposures it is very difficult to demonstrate causality and you think about things on a risk continuum instead. That should be the standard that is being applied to this body of evidence in the White Paper.²¹⁷

We note that elsewhere in its proposals the Government does take a more risk-based approach in the absence of proof of causality. In justifying its proposed introduction of stakes limit for online slots, the White Paper states:

While the evidence of a clear causative relationship is limited, there is sufficient evidence of an association between higher staking on slots and identified risks of harm to justify action on a precautionary basis as part of the wider package of protections. The Gambling Commission also advises the government pursue a stake limit for online slots products.²¹⁸

77. We received some evidence supporting the Government's approach. The ASA stated that it had not seen evidence of harm from gambling advertising for which restrictions on volume, rather than on scheduling, placement, or content—as are already in force—were likely to be an appropriate response.²¹⁹ The gambling industry also cited the lack of evidence for advertising being directly linked to harm and defended the right of operators to advertise their products and distinguish themselves from their competitors.²²⁰ It was argued that gambling advertising also provides a way for licensed operators to distinguish themselves from the black market, and therefore acts as a form of protection for consumers by encouraging them to gamble with licensed operators.²²¹ The Gambling Commission made the same point in its evidence to the Gambling Act Review, though it noted there is currently very limited research on the impact of advertising restrictions on black market participation.²²²

214 Ibid.

215 Ibid; Bristol Hub for Gambling Harms Research, University of Bristol ([GAM0075](#))

216 Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology/Visiting Professor of Gambling Studies at University of Birmingham/King's College London) ([GAM0109](#)); [Q188](#) [Professor Heather Wardle]

217 [Q188](#) [Professor Heather Wardle]

218 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.55

219 ASA System ([GAM0060](#))

220 Betting and Gaming Council ([GAM0149](#))

221 [Q128](#)

222 Gambling Commission, *Advice to Government - Review of the Gambling Act 2005*, April 2023, p.41

78. **There is an urgent need to better understand the effects of gambling advertising on the risk of harm. The evidence for a link between advertising and gambling harm currently appears much stronger than evidence indicating there is a risk of displacement to the black market if gambling advertising were restricted. *The Government must commission independent longitudinal research on the link between gambling advertising and the risk of gambling harm, including specifically for women and children.***

Gambling advertising and sponsorship in sport

79. Much of the discussion of gambling advertising during our inquiry focused on advertising and sponsorship in football and other sports. Sports betting is a significant gambling market, worth more than £2 billion GGY in 2021–22; online betting on football made up nearly half of this at more than £1 billion GGY, followed by horseracing at 33% of the total.²²³ It is therefore unsurprising that a large amount of gambling advertising and sponsorship is concentrated around and during Premier League and English Football League (EFL) matches, as well as in other elite sports competitions. In the current season, eight of the 20 Premier League clubs have a gambling shirt sponsor.²²⁴ Sky Bet is a title sponsor of the EFL and multiple EFL clubs also have sponsorship deals with gambling companies, worth around £45 million in total annually.²²⁵ This has raised concern about the role of football and other sports in exposing its fans, and particularly children, to gambling marketing. The gambling industry implemented the whistle-to-whistle ban in recognition of this, which, according to the Betting and Gaming Council, has reduced the number of TV betting adverts seen by children in the whistle-to-whistle period by 97%.²²⁶

80. Outside of the industry, however, the whistle-to-whistle ban has been criticised as ineffective because match viewers—whether inside the stadium or watching on TV—are still exposed to numerous gambling adverts and logos displayed on perimeter boards and on players’ kit.²²⁷ A recent study by the University of Bristol found that in the opening weekend of the current 2023–24 Premier League season nearly 7,000 gambling messages were visible during the course of six matches surveyed.²²⁸ Significantly, the high volume of advertising visible during football matches is difficult for those watching to avoid as, unlike direct marketing for gambling, viewers cannot opt-out. On these bases, multiple submissions to us called for a ban on gambling sports sponsorship or limits to the volume of adverts visible during fixtures, in line with the Gambling Commission’s recommendation in its advice to the Gambling Act 2005 Review.²²⁹

81. In the White Paper, the Government acknowledges that sports sponsorship is one of the main ways children, as well as those currently experiencing problem gambling, are unavoidably exposed to gambling branding. But it argues that existing evidence shows

223 Gambling Commission, “[Gambling Industry Statistics April 2008 to March 2022](#)”, accessed 21 November 2023

224 Score and Change, “[Overview of the 2023/2024 Premier League sponsors](#)”, accessed 22 November 2023

225 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, p.106

226 Letter from Michael Dugher, CEO of the Betting and Gaming Council, to Dame Caroline Dinenage MP, Chair of the Culture Media and Sport Committee, dated [16 October 2023](#)

227 House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), p.130

228 University of Bristol and 5 News, [New Season, More Self-Regulation, More Marketing. The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024](#), September 2023, p.4

229 Gambling Commission, [Advice to Government - Review of the Gambling Act 2005](#), April 2023, p.44–46

that sports sponsorship has a lower impact on people's intention to gamble compared to other forms of advertising. In addition, it notes the financial contribution gambling sponsorship makes to many sports. For sports lacking high-value broadcasting rights packages, including lower-league football, sponsorship by gambling companies can make up a significant proportion of their total revenue.²³⁰ The Government therefore proposed no direct action but says it will support sports governing bodies to develop a gambling sponsorship code of conduct, arguing that they are best placed to decide what measures are appropriate to protect their fans.²³¹

82. Some of the principles suggested by the Government for inclusion in a gambling sponsorship code of conduct include ensuring that gambling advertising is not visible in or from dedicated family areas in stadia and requiring a proportion of gambling adverts in stadia to be safer gambling messages. The latter point was also made by the BGC, who proposed that at least 20% of all gambling advertising on perimeter boards should be safer gambling messaging.²³²

83. Shortly before publication of the White Paper, the Premier League announced that all its clubs will withdraw front-of-shirt gambling sponsorship from the start of the 2026–27 season.²³³ Though some evidence to us welcomed the Premier League's decision, it was argued that removing front-of-shirt sponsorship would have a minimal impact on the total amount of gambling advertising seen by viewers during matches.²³⁴ A recent study published in July this year appears to confirm this, finding that front-of-shirt gambling branding consisted of just 7% of all that was visible during the 10 broadcast matches surveyed.²³⁵ As is noted in the White Paper, children's exposure will be reduced in other contexts, as front-of-shirt logos on Premier League kits are reproduced in video games and children's products such as stickers.²³⁶ Nevertheless, removing front-of-shirt gambling sponsorship alone will not greatly reduce children's exposure to gambling advertising through topflight football.

84. While the existing evidence base does not show a causative link between gambling advertising and harm, it seems clear that advertising encourages participation in gambling and that this effect is more pronounced for children and those vulnerable to gambling harm. Though the White Paper's proposals regarding direct marketing and promotional offers are welcome, the Government should have taken a more precautionary approach to gambling advertising in general—particularly to minimise children's exposure. We do not consider that a complete ban on gambling advertising would be appropriate, but this still leaves scope for further regulation beyond that proposed by the Government.

230 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.106

231 *Ibid.*, p.107

232 Letter from Michael Dugher, CEO of the Betting and Gaming Council, to Dame Caroline Dinenage MP, Chair of the Culture Media and Sport Committee, dated [16 October 2023](#)

233 "[Premier League statement on gambling sponsorship](#)", Premier League news release, 13 April 2023.

234 [Q169](#)

235 Torrance et al., "[Gambling, cryptocurrency, and financial trading app marketing in English Premier League football: a frequency analysis of in-game logos](#)", (July 2023).

236 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.109.

85. The withdrawal of gambling sponsorship from the front of Premier League players' kit is welcome, but it will not significantly reduce the volume of gambling adverts visible during top-flight matches. *The Government must work with the Premier League and the governing bodies of other sports to ensure that the gambling sponsorship code of conduct contains provisions reducing the volume of gambling adverts in stadia. The Code should also require that a higher proportion of gambling advertising in stadia is dedicated to independently-developed safer gambling messaging.*

86. *The publication of the Code has been delayed repeatedly which is highly regrettable. The Government should require the relevant sporting bodies to publish the Code, incorporating the committee's recommendations, without further undue delay.*

6 Land-based gambling

87. There are around 8,400 licensed gambling premises in Britain. Of these, around 6,200 are betting shops.²³⁷ Other types of venue include, in order of scale, adult gaming centres (c.1,300), bingo clubs (c.600), family entertainment centres (c.150), and casinos (c.140).²³⁸ The total number of premises has decreased in the past decade and particularly since the Covid-19 pandemic: there were more than 10,100 licensed venues as of March 2020.²³⁹ Betting shops have experienced the greatest overall decline, while the number of casinos and bingo clubs remained stable until the pandemic. Participation in land-based gambling and the GGY of the land-based sector have also gradually fallen in the last decade as online gambling has grown. In 2022, the participation rate of online gambling overtook that of land-based for the first time. In the same year, the total GGY of the land-based sector was £3.5 billion, compared to £6.4 billion for the online industry.²⁴⁰ Though smaller in revenue, the land-based sector has a much larger workforce than online gambling—the White Paper cites a figure of approximately 80,000 people out of an industry total of around 110,000 people.²⁴¹ The sector is jointly regulated by the Gambling Commission, which licences gambling operators, and local authorities (licensing boards in Scotland), which licence gambling premises.

88. There is evidence to suggest that the rate of problem gambling associated with the land-based sector as a whole is lower than for online gambling.²⁴² Most forms of land-based gambling do not offer the same 24-hour accessibility of online gambling and there is usually an element of staff supervision, though conversely there is less opportunity for account-based monitoring of customers.²⁴³ However, in practice many of those experiencing problem gambling use multiple products, which may include a combination of online and land-based, making it difficult to be definitive in this analysis.²⁴⁴ As with online gambling, certain land-based products are more associated with harm than others. Particular concern has been raised about Category B2 Machines, also known as Fixed Odds Betting Terminals (FOBTs), which prompted the Government in 2019 to lower the maximum stake on these machines from £100 to £2 (see Table 1 for a full list of different types of electronic gaming machines).

237 Gambling Commission, "[Industry Statistics – November 2022](#)", accessed 24 November 2023

238 Ibid.

239 Gambling Commission, "[Gambling Industry Statistics, April 2008–March 2022](#)", accessed 24 November 2023

240 Gambling Commission, "[Industry Statistics – November 2022](#)", accessed 24 November 2023

241 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, p175; Betting and Gaming Council ([GAM0077](#))

242 NHS Digital, "[Health Survey for England, 2021: Data tables](#)", accessed 24 November 2023

243 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, p.275

244 [Q330](#)

Table 1: Gaming machine categories

Category	Stake limit	Maximum prize	Venues available
A	Unlimited	Unlimited	Not permitted in Britain
B1	£5	£10,000	Casinos only
B2	£2	£500	Casinos, betting shops, racetracks with pool betting
B3	£2	£500	All of the above, adults gaming centres, bingo clubs
B4	£2	£400	
C	£1	£100	All of the above, family entertainment centres, members' clubs
D (money prize)	10p	£5	All of the above, pubs, commercial clubs, travelling fairs, unlicensed family entertainments centres with a permit
D (non-money prize)	30p	£8	
D (crane grab machines only)	£1	£50	
D (combined money and non-money prize)	10p	£8 (of which no more than £5 may be money prize)	
D (coin pusher or penny falls machines only)	20p	£20 (of which no more than £10 may be a money prize)	

Source: Gambling Commission, "[Gaming Machine Categories](#)", accessed 10 October 2024

89. A key principle underpinning the Gambling Act 2005 is that restrictions on the location and number of gambling products is an important consumer protection. As well as confining land-based gambling to licensed venues, the Act aimed to limit the availability of riskier activities and products, particularly higher-stake gaming machines, to premises with more customer protections. Reflecting this, current regulation of the sector imposes various restrictions on the category and number of electronic gaming machines and other products that different types of gambling venue can offer.²⁴⁵ The Gambling White Paper proposes relaxing some of these restrictions. The Government argues that limits on the supply of land-based gambling products are now less relevant as a form of protection as consumers can easily access equivalent products online.²⁴⁶ Evidence from the land-based industry made the same point and argued that current regulations are holding the sector back at a time when many operators are struggling in the wake of the Pandemic and with current inflationary pressures.²⁴⁷

245 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, pp.185–186

246 Ibid.

247 Betting and Gaming Council (Casino sector submission) (GAM0079); Rank Group Plc (GAM0049 and GAM0111) Novomatic UK (GAM0037 and GAM0147); Bacta (GAM0063 and GAM0158); Gambling Business Group (GAM0103 and GAM0116); The Bingo Association (GAM0091 and GAM0159)

Electronic gaming machines

90. A gaming machine is defined by the Gambling Act 2005 as a machine that is designed or adapted for use by individuals to gamble, even if it can also be used for other purposes.²⁴⁸ The most common types of machines include fruit, slot, or jackpot machines. Gaming machines fall into categories according to the maximum stake and prize they offer. Higher categories of machine are only permitted in certain gambling venues (see Table 1 above). There are also restrictions on the ratio of machine categories certain venues can have. Bingo clubs and adult gaming centres are allowed no more than 20% of their total number of gaming machines to be Category B; the remaining 80% must be Category C or D. This is often referred to as the “80:20 rule”. Evidence to us from the bingo and adult gaming centre sectors called for this rule to be scrapped, or at least modified. It was argued that the rule prevents operators from meeting demand: Category B machines are much more popular among customers and provide a higher proportion of machine revenue for operators (70% in some cases).²⁴⁹ Maximising the number of Category B machines on offer causes operators to have a surplus of Category C and D machines, many of which go unused, wasting space and electricity.²⁵⁰ These arguments were accepted by the Government, and the Gambling White Paper states that DCMS will consult on reducing the required ratio of Category B machines to Category C and D from 80:20 to 50:50.²⁵¹

Casinos

91. There are some 144 licensed casinos in Britain.²⁵² Casinos offer a mix of electronic gaming machines, live tables where individuals can play games such as roulette or poker with other customers, and non-gambling spaces. Regulation of the sector is complex as casinos are licensed under one of two pieces of legislation: the Gaming Act 1968 or the Gambling Act 2005. The latter provided for two forms of casinos, known as large and small 2005 Act casinos. Each licensing regime imposes specific restrictions on the number of Category B gaming machines casinos are allowed and the amount of space in their premises to be used for gambling and non-gambling activity. 2005 Act casinos also face requirements regarding the ratio of gaming machines to live tables, but, unlike 1968 Act casinos, they are permitted to offer sports betting. These rules (set out in Table 2 below) are meant to ensure casinos offer a range of products and, regarding the space requirements, encourage customers to take breaks from gambling. The 2005 Act provides for only 16 casino licences (eight small casinos, eight large); it was intended that the new regime would be a pilot for wider casino modernisation, and, subject to an assessment, more licences would be created, gradually replacing the 1968 Act regime.²⁵³ This assessment never happened, and only seven of the 16 2005 Act licences have been taken up. The vast majority of casinos remain licensed under the 1968 Act.

248 Gambling Act 2005, [Section 235](#)

249 Rank Group Plc ([GAM0049](#))

250 Bacta ([GAM0063](#)); The Bingo Association ([GAM0091](#)); Novomatic UK ([GAM0037](#)); Rank Group Plc ([GAM0049](#)); [Q155](#)

251 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.209

252 *Ibid.*, p.189

253 *Ibid.*, pp.176–178

Table 2: Rules for different casino licenses

	1968 Act Casinos	Small 2005 Act Casinos	Large 2005 Act Casinos
Maximum number of Category B machines	20	80	150
Machine to live table ratio	None	2:1	5:1
Total gambling area	None	500–1,500 sqm	1,500–3,500 sqm
Table gambling area	None	500 sqm	1,000 sqm
Non-gambling space	10% of total if venue size is more than 200 sqm	250 sqm	500 sqm

Source: Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.189

92. The casino sector has called for a harmonisation of the rules between the 1968 and 2005 licensing regimes, and in particular for the allowance of gaming machines in 1968 Act casinos to be increased to 80, subject to space requirements, matching that for small 2005 Act casinos. Evidence from representatives of the sector pointed out that the existing rules mean that casinos of the same size are arbitrarily subject to different allowances depending on which piece of legislation they are licensed under. Increasing the cap on machines would be of commercial benefit to casino operators, but it was argued this would also help to protect customers as, at busy times, the high demand for the limited number of gaming machines can discourage players from taking breaks and ceding the machine they are playing on.²⁵⁴ The sector has also called for sports betting to be permitted in 1968 Act casinos, as it already is in those licensed under the 2005 Act. Evidence from the Rank Group plc argued that its customers frequently bet on sports online using their phones while in the Group's casino venues, demonstrating the inconsistency of the current ban on sports betting.²⁵⁵

93. Both sets of arguments were accepted in the Gambling White Paper. The Government proposes allowing 1968 Act casinos which meet the size and space requirements of a 2005 Act small casino the same maximum allowance of 80 machines, with the machine to table ratio being equalised at 5:1 for all types of casinos. In addition, those 1968 Act casinos that do not meet the size requirements will be allowed more machines on a pro rata basis commensurate with their size and non-gambling space, subject to the same machine to table ratio. The Government notes recent measures adopted by casinos that enhance gaming machine protections, including in-built time and deposit limits. The White Paper also proposes that all casinos will be able to offer sports betting.²⁵⁶

Offering credit to international visitors

94. The casino sector includes a small number of 'high-end' casinos, which cater for high-net-worth and predominantly international customers who usually gamble large sums on live tables. As a general consumer protection, the Gambling Act 2005 prohibits

254 Betting and Gaming Council (Casino sector submission) ([GAM0079](#)); Rank Group Plc ([GAM0049](#))

255 Rank Group Plc ([GAM0049](#))

256 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.192

gambling operators from offering credit to customers.²⁵⁷ In the past, high-end casinos have bypassed this restriction by allowing customers to pay with cheques at the end of their visit, rather than incurring the costs of currency exchanges each time they need new funds during play. Increasingly, however, banks are phasing out cheque cashing facilities and the high-end sector argues that its business model is at risk, especially in the face of international competition.²⁵⁸ The White Paper proposes to address this by amending the 2005 Act to remove the prohibition on land-based casinos giving credit to non UK-resident customers, subject to new licence conditions and codes of practice.²⁵⁹

Cashless payments

95. Direct payments via debit card on electronic gaming machines have been prohibited since 2007, with the aim of these regulations being to encourage customers to pay with cash. Cash payments were thought to be safer as customers are forced to take breaks in play to obtain more funds, with rules on the positioning of ATMs initiated for the same effect.²⁶⁰ Cashless options are available—for example, it is possible to make electronic payments via an app on some machines—but the White Paper notes that these have had low take up and most payments on gaming machines continue to be with cash.²⁶¹

96. Across society as a whole, the use of cash payments is declining as debit cards are increasingly used instead.²⁶² Evidence from the land-based sector highlighted this and argued the restriction had become an impediment for operators as many customers expect to be able to make electronic payments on gaming machines.²⁶³ John White, CEO of Bacta, described the increasingly anomalous status of the land-based gambling sector in this regard:

[It] is 2023 now. We are all using debit cards, using our phones, to pay for every single thing that we buy. It seems rather bizarre that one sector of the economy, and a tiny one at that, is told that it cannot offer its customers that particular method of payment. By the way, nobody is suggesting that we do away with cash or any other form of payment; it is just about providing that option to the customer to play on the machines.²⁶⁴

Wes Himes, Director of Standards and Innovation at the Betting and Gaming Council, noted that it is now possible for the friction inherent in ATM withdrawals to be recreated for cashless payments, such as by introducing a time delay in the processing of the transaction. He added that modern, digital gaming machines have in-built safety features including deposit limits and reality checks.²⁶⁵ Other considerations given in the White Paper itself include the security risk posed to land-based venues, as they are increasingly the only cash-based venue on the high street and a target for robberies. On these grounds,

257 Gambling Act 2005, [Section 81](#)

258 Les Ambassadeurs Casino Mayfair ([GAM0024](#))

259 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp. 196–198

260 The Gaming Machine (Circumstances of Use) Regulations 2007 ([SI 2007/2319](#))

261 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.181

262 UK Finance, *UK Payment Markets Summary 2022*, (August 2022), p.1

263 Gambling Business Group ([GAM0103](#)); Bacta ([GAM0063](#))

264 [Q162](#)

265 [Q161](#)

the Government proposes that it will work with the Gambling Commission to develop options for how cashless payments on machines could work in practice, including the customer protections operators will be required to have in place before the ban is lifted.²⁶⁶

97. We support the introduction of cashless payments for electronic gaming machines, provided they are subject to an equivalent level of friction to cash payments. We recommend that customers who prefer to pay on electronic gaming machines using cash should continue to be able to do so on all machines following any introduction of cashless payments.

Impact of reforms to the land-based sector

98. The White Paper's proposed reforms to the sector were largely welcomed in evidence to us from land-based operators and representatives.²⁶⁷ While the Government estimates an overall decline in gambling industry gross gambling yield as a result of its reforms, the GGY of the land-based sector is forecast to rise by 2.4–5.3%, though the majority of the increase is predicted to be enjoyed by the small number of high-end casinos permitted to offer credit to international customers.²⁶⁸ Evidence from charities, campaign groups and others tended to focus on the risk of harms from online gambling and advertising and less so on land-based gambling. However, some submissions questioned whether the Government had, in proposing a set of liberalising reforms for the land-based sector, effectively overlooked its risk of causing harm.²⁶⁹ Professor Jim Orford contrasted the Government's approaches to the online and offline sectors:

These changes will increase the intensity of gambling available and the prediction must be that the financial and other harms associated with gambling will increase. It is hard to accept that Government is proposing to try and reduce harmful gambling with one hand while increasing the risks with the other.²⁷⁰

99. As noted at the start of this chapter, the Government's position is that developments in technology and the availability of online gambling mean that the characteristics of gambling products and operators' ability to monitor customers have assumed greater importance in protecting customers than restrictions on the availability of products in land-based settings. The White Paper notes recent developments in electronic gaming machines that enable operators to track customer expenditure and for customers themselves to set time and spending limits. Similar monitoring is enabled when customers use debit cards, rather than cash, to pay on electronic gaming machines.²⁷¹ The White Paper also states that the gambling industry has shown evidence that, counterintuitively,

266 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.203

267 Bacta ([GAM0158](#)); The Gambling Business Group ([GAM0116](#)); Rank Group ([GAM0111](#)); Hippodrome Casino Limited ([GAM0131](#)); Novomatic UK ([GAM0147](#)); [Q155](#)

268 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.221

269 Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology/Visiting Professor of Gambling Studies at University of Birmingham/King's College London) ([GAM0109](#)); Greater Manchester Combined Authority ([GAM0150](#)); Mr Steven Sargent ([GAM0106](#)); [Q34](#); [Qq178–179](#)

270 Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology/Visiting Professor of Gambling Studies at University of Birmingham/King's College London) ([GAM0109](#))

271 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.201–203

increased availability of gaming machines in some settings may help to protect customers by reducing the average amount of time customers spend playing them.²⁷² Though we are persuaded by these points, it will be incumbent on the Government and the Commission to monitor the impact of these changes and ensure these new opportunities to protect customers are realised.

100. The accessibility of online gambling means that some of the supply-level restrictions on the land-based sector are less relevant than when the Gambling Act 2005 was passed. The Committee therefore considers that the White Paper’s proposed reforms to modernise land-based gambling are appropriate. However, in its response to this report, the Government must set out how it and the Gambling Commission will be monitoring the impact of these changes, particularly the increased availability of Category B gaming machines in high street venues, on the risk of gambling harm.

Licensing authority powers

101. As noted above, local authorities are responsible, alongside the Gambling Commission, for the regulation of land-based gambling. This includes considering applications and issuing licences for gambling premises. In so doing, local authorities are, like the Commission, bound by the statutory “aim to permit” under the Gambling Act 2005, which means they must accept applications for gambling premises as long as they meet the three licensing objectives under the Act: to keep gambling fair, free of crime, and to protect children and other vulnerable people from harm and exploitation.²⁷³ We received written evidence from the Local Government Association (LGA), which argued that this duty does not afford councils sufficient flexibility in managing the number of gambling premises in their area. The LGA said the duty had enabled the so-called “clustering” of betting shops and other gambling venues on high streets, with evidence showing that clusters are disproportionately located in more deprived areas.²⁷⁴ The same points were made to the Government’s Review of the 2005 Act and the White Paper states that the Government will legislate (subject to Parliamentary time) to introduce cumulative impact assessments (CIAs) in gambling licensing applications to local authorities. CIAs are already used in alcohol licensing and, for gambling, will require applicants to prove they will not add to the risk of gambling harms in an area and will create a presumption against new licences where there are already many gambling premises.

102. The LGA welcomed this proposal, although it noted that CIAs will not prevent new premises in an area with no or few gambling venues but which councils or residents feel is an inappropriate location, such as in close proximity to a school.²⁷⁵ Written evidence from Greater Manchester Combined Authority said there was a lack of clarity as to how CIAs can be applied to gambling premises as they were originally designed to address the specific problems associated with a high density of alcohol outlets (e.g. anti-social behaviour and nuisance complaints), which are not commensurate with the risks of a high density of gambling premises.²⁷⁶ In oral evidence, John White of Bacta said there was

272 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.190

273 Gambling Act 2005, [Section 153](#)

274 Local Government Association ([GAM0039](#)); House of Lords, *Gambling Harm—Time for Action*, Report of the Select Committee on the Social and Economic Impact of the Gambling Industry, Session 2019–21, [HL Paper 79](#), pp.35–36

275 Local Government Association ([GAM0114](#))

276 Greater Manchester Combined Authority ([GAM0150](#))

nothing wrong in principle with CIAs being used by local authorities from the perspective of high-street operators, “as long as the statutory aim to permit continues to apply, as it does”.²⁷⁷

103. We welcome the proposal to allow local authorities to use cumulative impact assessments (CIAs) in handling gambling premise licence applications. The Government must ensure councils are given guidance on how CIAs can be applied to gambling premises. It must also ensure this new power is reviewed in during the next Parliament to ensure it is having the intended effect.

Horseracing

104. Horseracing is the UK’s second largest sport in terms of attendances, employment and annual revenues. It generates around £4.1 billion annually, and there are 59 racecourses hosting around 1,500 race meetings per year, with 5 million spectators attending.²⁷⁸ Betting and horseracing have a long and closely interdependent relationship; more than £13 billion was bet on horseracing by UK customers in 2021/22.²⁷⁹ The sport derives much of its revenue from betting operators, including media rights, sponsorship and advertising, as well as the Horserace Betting Levy. The levy is charged at 10% of a bookmaker’s gross profits above the first £500,000 they make on British racing. The money raised is applied to supporting breeds of horses, the advancement of veterinary science and education, and the improvement of horseracing. The Levy raised £100 million in 2022–23 (broadly in line with pre-pandemic levels) and makes up around 6% of British horseracing’s total annual revenue.²⁸⁰

105. Evidence to us from the racing industry raised concerns about financial risk checks, arguing that they risk deterring some gambling customers who bet on horseracing and so reducing the sport’s income.²⁸¹ The White Paper acknowledges that its measures will likely reduce horseracing’s income from the Levy as well as reduced gambling sponsorship and media rights because of the fall in online gambling operators’ GGY. In total, it predicts a reduction of 0.5% and 1% of total horseracing income, largely driven by a drop of 6% to 11% in the share of the Levy collected from online operators.²⁸²

106. The Government states that it recognises the contribution horseracing makes to British sport as well as to the rural economy, a point reaffirmed by the Minister when before us.²⁸³ The White Paper announced that the Government had begun a review of the Horserace Betting Levy—a year earlier than is required by statute—which will account for the impact of its wider gambling reforms. Evidence to us from the British Horseracing Authority (BHA) said that, to ensure the future of the sport, the new target for the Levy to raise should be £133 million. It proposed several ways this could be met, including extending the Levy to apply to all horseracing bet on by British customers, regardless of

277 [Q153](#)

278 British Horseracing Authority ([GAM0076](#))

279 *Ibid.*

280 Horserace Betting Levy Board Annual Report and Accounts 2022/2023, 11 December 2023, [HC 370](#), p.3

281 British Horseracing Authority ([GAM0076](#) and [GAM0137](#)); UK Tote Group ([GAM0036](#) and [GAM0112](#))

282 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.231–232

283 *Ibid.*, p.12; [Q391](#)

whether the race is outside of the UK; increasing the levy rate; or basing the levy rate on overall bookmaker turnover, rather than GGY. The Minister said the Government had encouraged the BHA and BGC to “get together” to come up with some proposals.

107. Regarding any changes to gambling sponsorship and advertising led by sports governing bodies through a code of conduct, the White Paper envisages a distinct approach to horseracing as well as greyhound racing, given both sports’ long-standing relationships with gambling operators. The BHA welcomed this proposal.²⁸⁴

108. The Government must ensure that the new settlement arising from the review of the Horserace Betting Levy mitigates the impact of the White Paper’s reforms on the racing industry and ensuring British racing’s future. We support the proposal for a distinct approach gambling sports sponsorship and advertising for horseracing and greyhound racing, given both sports’ close and long-standing relationships with betting.

7 Gambling research, prevention and treatment

The voluntary funding system

109. Funding for research into gambling harms, education about the risks of gambling and other preventative measures, and the provision of treatment services to those experiencing problem gambling is currently provided by the gambling industry on a voluntary basis. The Gambling Commission requires operators to make an annual financial contribution to one or more organisations it has approved. The Commission does not specify how much operators should contribute, on the basis that the requirement is a licence condition and not a levy approved by Parliament. In practice, most operators have given 0.1% of their annual gross gambling yield (GGY) to the charity GambleAware. This arrangement has historically raised annual funding of around £10 million. In 2019, the five largest gambling operators (now four due to mergers) increased their voluntary contributions to 1% of GGY and pledged to spend a cumulative £100 million specifically on problem gambling treatment by 2024, with GambleAware the nominated recipient.²⁸⁵

110. GambleAware uses the funds it receives to commission The National Gambling Support Network (formerly known as The National Gambling Treatment Service), a group of organisations providing support and treatment for those experiencing problem gambling. The largest of these is the charity GamCare, which runs a network of counselling services across the country and the National Gambling Helpline. GambleAware also commissions research into gambling harms, and until recently provided £1.2 million annually to NHS England to part fund its specialist gambling treatment services. NHS England ended this arrangement in April 2022 following concerns from patients about using services part-funded by the gambling industry, and from clinicians about possible conflicts of interest.²⁸⁶ Until 2019, specialist NHS treatment for problem gambling was only available in London, at the National Problem Gambling Clinic. The 2019 NHS Long Term Plan included a commitment to expand NHS services, with 15 new specialist clinics to be opened by 2024. Twelve are now in operation.²⁸⁷

Criticisms of the voluntary funding system

111. Many organisations, including GambleAware, have criticised the voluntary funding system and argued that it should be replaced by a statutory levy.²⁸⁸ The main criticisms of the voluntary system include:

- It generates an insufficient quantum of funding for the research, prevention and treatment services required.

285 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.128–129

286 “NHS stops taking gambling funds to treat addiction”, BBC News, 19 February 2022

287 National Health Service, *The NHS Long Term Plan*, (January 2019), p.43; Department for Culture, Media and Sport, “[Consultation on the structure, distribution and governance of the statutory levy on gambling operators](#)”, 17 October 2023

288 GambleAware ([GAM0047](#))

- As contributions are at the discretion of gambling operators and based on a percentage of their GGY, the total annual funding raised can fluctuate, making longer-term financial planning of services difficult.
- The voluntary nature of contributions casts doubts on the integrity of any research they fund; many academics have said they are unwilling to accept funding under the current system on this basis, leading to a relative lack of research into gambling to other comparable subjects.²⁸⁹

While acknowledging the recent increase in contributions by the largest gambling operators, the White Paper accepts the arguments against the voluntary funding system and states that the Government will introduce a statutory levy, to be collected and distributed by the Gambling Commission under the direction of DCMS and HM Treasury.²⁹⁰ DCMS's consultation on the design and scope of the statutory levy formally opened on 14 October and is due to close on 14 December. The consultation document estimates that the levy will raise £90 to £100 million per year by 2027.²⁹¹ This will represent a substantial uplift to the funding available for gambling research, prevention and treatment and is very welcome.

The statutory levy

Implementation

112. As with the other main reforms in the White Paper, the Government's stated aim is for the statutory levy to be in force by summer 2024. Section 123 of the Gambling Act 2005, which has never been commenced, provides for the creation of a statutory levy, meaning only secondary, rather than primary, legislation will be required. Nevertheless, some concern was expressed to us by GambleAware and others about the risk of disruption to treatment services in the transition from voluntary to statutory funding.²⁹² The White Paper gives little detail on this point, stating only that the cumulative £100 million of funding pledged by the four largest operators to GambleAware for treatment services will continue to be delivered.²⁹³ This was reaffirmed by the Betting and Gaming Council, on behalf of these operators, in oral evidence to us.²⁹⁴ In July, the Gambling Commission announced that nearly £33 million in regulatory settlements had been allocated to GambleAware to help establish a System Stabilisation Fund to ensure continuity for services whose funding stream has been disrupted by the announcement of the move to the statutory levy.²⁹⁵ The Minister was confident that the interim support available would be sufficient, though he acknowledged the difficulty any uncertainty would create for third sector providers.²⁹⁶ This uncertainty would be reduced if the Government could provide a clearer timescale for how long the interim funding period will last.

289 Ibid.

290 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.134

291 Department for Culture, Media and Sport, "[Consultation on the structure, distribution and governance of the statutory levy on gambling operators](#)", 17 October 2023

292 [Q47](#); GambleAware ([GAM0152](#)); Gambling Related Harm All-Party Parliamentary Group ([GAM0153](#))

293 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.112

294 [Q136](#)

295 Gambling Commission, "[Destinations of regulatory settlement to be applied for socially responsible purposes](#)", accessed 22 November 2023

296 [Q350](#)

113. We reaffirm our recommendation for the Government to set out a timetable for the delivery of each of the White Paper’s main proposals, including implementation of the statutory levy, in response to this report. *The Government should set out how it will minimise disruption to services currently funded under the voluntary system during the transition to the statutory levy.*

Determining levy contributions

114. One of the key questions for the DCMS consultation on the levy is how payments made by different gambling operators will be determined. Evidence to us from the land-based gambling sector said that the Government should take into account the higher fixed costs faced by its operators, particularly as many are struggling with financial pressures caused by the Covid-19 lockdowns and increased energy prices.²⁹⁷ It was argued that requiring land-based operators to match the contributions of the largest online companies would be unfair and unsustainable. For example, the Bingo Association said that a levy rate set at 1% of GGY—the percentage currently voluntarily contributed by the largest online operators—would amount to 12% of all licensed bingo club profits and close hundreds of clubs overnight.²⁹⁸ Several submissions, representing land-based operators and as well as from charities and campaign groups argued that the levy should determine the contributions of different operators or sectors according to the risk of gambling-related harm associated with them, in line with the “polluter-pays” principle. Such a system would in practice likely result in lower levy payments from most land-based operators, given the overall lower rate of problem gambling associated with the sector.²⁹⁹

115. Section 123 of the Gambling Act 2005 affords the Government wide scope in determining how the levy is to be calculated and would allow for a tiered or “smart” levy that distinguishes between operators on this or some other basis.³⁰⁰ The White Paper states that the Government’s consultation on the levy will take into account the differing associations of different sectors with harm or their differing fixed costs.³⁰¹ Its consultation sets out a proposal for a tiered system of levy contributions. Online operators will pay 1% of GGY, while contributions for land-based operators will be either 0.4% of GGY for casinos and betting operators, or 0.1% for arcade, bingo, and society lotteries. These rates will apply from 2026–27 following a transition period in which contributions will scale up annually. Operators with GGY under £500,000 will be exempt.³⁰²

116. We support the proposed structure of the statutory levy. This gives due consideration to the higher overhead costs of land-based operators and the lower rates of problem gambling associated with the sector as a whole, while also ensuring a substantial uplift in funding available for gambling research, prevention and treatment.

297 Bacta ([GAM0158](#)); The Bingo Association ([GAM0091](#)); Novomatic UK ([GAM0147](#)); Rank Group ([GAM0111](#)); The Gambling Business Group ([GAM0116](#)); [Qq140–143](#)

298 The Bingo Association ([GAM0091](#))

299 Novomatic UK ([GAM0147](#)); Local Government Association ([GAM0039](#)); Social Market Foundation ([GAM0055](#)); All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); Merkur UK ([GAM0081](#)); Betknowmore UK ([GAM0107](#)); Peers for Gambling Reform ([GAM0125](#));

300 Gambling Act 2005, [Section 123](#)

301 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.134

302 Department for Culture, Media and Sport, “[Consultation on the structure, distribution and governance of the statutory levy on gambling operators](#)”, 17 October 2023

Funding for treatment

117. The Government's proposed breakdown of the distribution of levy funding will be 40–60% to gambling treatment, commissioned by the NHS 15–30% to prevention (encompassing education about gambling risks as well as other early intervention initiatives), the commissioning structure of which is to be determined; and 10–20% to research, commissioned by UK Research and Innovation (UKRI). Central oversight and governance of the levy will be provided by a levy board with representation from DCMS, HM Treasury, the Department for Health and Social Care (as the government lead for treatment), and the Department for Science, Innovation and Technology (as the government lead on research), as well as the Welsh and Scottish governments. An informal advisory group consisting of experts from across academia, local government, public health and lived experience will support the work of each commissioning body.³⁰³ This proposed model accords with some evidence we received in our inquiry, which emphasised the need for administration of the statutory levy to be a cross-government exercise and, in particular, for there to be a leading role for the NHS and DHSC, given the bulk of levy funding will go towards treatment services.

118. We also received evidence arguing that the level of integration between NHS and third sector treatment providers needs to improve.³⁰⁴ Dr Gaskell of the NHS Northern Gambling Service described how the number of patient referrals to his clinics from voluntary sector partners was low, and zero in some cases.³⁰⁵ Will Prochaska, Strategy Director of Gambling With Lives, also cited low or no referral rates to other NHS gambling clinics by voluntary providers commissioned by GambleAware.³⁰⁶ Written evidence we received from Dame Clare Gerada, lead of the NHS Primary Care Gambling Service (PCGS), stressed the importance of primary care in gambling treatment.³⁰⁷ This point was also made by Charles Ritchie, Co-Chair of Gambling With Lives, though both he and Dr Gaskell suggested that current awareness and training regarding gambling disorders among GPs is often lacking.³⁰⁸ Evidence from the BMA, meanwhile, argued that, due to the co-morbid nature of gambling disorders in many cases, there is a need for support for gambling to be linked to existing drug and alcohol treatment services.³⁰⁹

119. Will Prochaska made wider criticisms about the quality of treatment offered by GambleAware-funded providers, including that it is not evidence based and has poor outcomes, with patients being discharged despite them still experiencing problem gambling.³¹⁰ These claims were strongly refuted by GambleAware in several supplementary written evidence submissions to us. It set out that in 2021–22 the rate of problem gambling among National Gambling Support Network (NGSN) services users fell from 90% to 28% between first and last appointments and that, among users who completed treatment, the rate of problem gambling was 13%. The charity stated that NGSN providers routinely make referrals to NHS clinics, noting that the latter only take referrals for severe cases and described how the NGSN treatment system is tiered according to the severity of gambling

303 Ibid.

304 Peers for Gambling Reform ([GAM0072](#)); All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#)); [Q257](#) [Charles Ritchie]

305 [Q182](#)

306 [Q256](#)

307 Dame Clare Gerada ([GAM0161](#)); Primary Care Gambling Service ([GAM0165](#))

308 [Q185](#); [Q257](#)

309 British Medical Association ([GAM0082](#))

310 Ibid.

harms a person is experiencing—while the higher tiers are seeing fewer patients per year, this is only due to more accessing treatment sooner at lower tiers.³¹¹ Mr Prochaska's comments were also disputed by Dame Clare Gerada, who emphasised the value of partnership working between the NHS and third sector, as demonstrated by the PCGS's, which is part of the NGSN.

120. It is clear that the current treatment system for gambling is fragmented and the Government must use the new NHS-led commissioning model to address this. In addition, funding for treatment under the statutory levy must also be ringfenced solely for gambling-connected purposes. More broadly, given that there will be multiple bodies involved in the levy's governance and three separate commissioners for each of research, prevention, and treatment, there is a clear need for an overarching strategy to guide the Levy Board's oversight and distribution of funds. The most recent National Strategy to Reduce Gambling Harms (which was delivered by GambleAware) ran until 2022³¹² and so the statutory levy offers an obvious opportunity for the development of a new national strategy.

121. We support the proposed governance structure for the statutory levy. However, the Government must ensure that levy funds are clearly ringfenced for the purposes of understanding, preventing, and treating gambling harm. It must also use the levy to improve the integration of gambling treatment services across the NHS and third sector. To these ends, we consider that a new national strategy for reducing gambling harms will be warranted. *Following the implementation of the statutory levy, the Levy Board should develop a new national strategy to reduce gambling harms. This strategy should include clear, measurable targets for harm reduction over a defined period.*

Gambling research and data

122. As described in the White Paper, and as we have found in our inquiry, there is a relative lack of research into gambling.³¹³ Funding from UKRI research councils has been limited; Professor Wardle said that this is in part due to gambling being considered a lower-priority (and lower-status) subject.³¹⁴ This has meant that in practice the main source of funding available for researchers has been via GambleAware, but this has historically been limited, with the majority of the charity's funding going to the commissioning of treatment.³¹⁵ The result of this lack of research is that many of the most important considerations affecting gambling policy are not properly understood; for example, and as we discussed in Chapter 5, the role of advertising in causing harm. The lack of gambling research was also cited as a problem in some evidence we received from the gambling industry, which argued that the existing evidence base is dominated by research into the harms, rather than potential benefits to individuals and society, created by gambling.³¹⁶

123. As discussed above, the statutory levy will provide a significant increase in the funding available via UKRI for gambling research. As oral evidence from Professor Wardle highlighted, however, an increase in the quantum of funding is only part of the

311 GambleAware ([GAM0160](#))

312 Gambling Commission, *National Strategy to Reduce Gambling Harms 2019 to 2022*, (24 April 2019)

313 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, pp.130–131

314 [Q193](#)

315 [Q193](#)

316 Betting and Gaming Council ([GAM0077](#)); Bacta ([GAM0063](#))

solution.³¹⁷ The Government must ensure that funding is directed towards addressing research priorities and gaps in existing knowledge, and that the research conducted is high-quality and fully independent. We were therefore glad to see included in DCMS's statutory levy consultation the proposal that UKRI establish a bespoke gambling research programme in accordance with the Haldane Principle, by which decisions on research are best taken by researchers themselves through peer review.³¹⁸ The Government states that this programme will aim to cover key questions and evidence priorities, many of which have already been identified by the Gambling Commission in its recent Evidence Strategy.³¹⁹ The Commission itself is to take a greater role in directly commissioning research to inform its regulatory work, following the review of its fees in 2024.³²⁰

The White Paper states that as the Gambling Commission's funding and capacity to collect data from gambling operators increases, it will make this data available in anonymised form for use by researchers.³²¹ The value of data from operators has been highlighted throughout our inquiry, particularly in the example of the *Patterns of Play* research conducted by Professors David Forest and Ian McHale of the University of Liverpool (commissioned by GambleAware).³²² The study was based on data from nearly 140,000 online gambling accounts from seven major operators, which enabled a detailed analysis of how players interact with different gambling products as well as the approach to customer intervention by gambling operators. It is cited fifteen times in the White Paper and identified as a key piece of research informing the Government's proposed reforms.³²³

124. As we have found during this inquiry, some of the most fundamental data informing gambling policy, including the prevalence rate of problem gambling, can be contested or misapplied. In August, Andrew Rhodes, Chief Executive of the Gambling Commission, wrote to us highlighting recent misuses of gambling statistics in evidence to us and more widely. This included instances in which the problem gambling rate was discussed in isolation, thereby implying it represents the extent of those suffering harms; and the conflation of the problem gambling rate with the rates of those at low or moderate risk of their gambling leading to negative consequences.³²⁴ The Commission, which is the producer of Official Statistics on gambling, determines these and other statistics through the inclusion of a set of gambling-related questions in the national health surveys. This is supplemented by the Commission's quarterly telephone survey to assess gambling participation and problem gambling prevalence, though this research is much less detailed. There is currently no single, recognised measure of gambling-related harms, and measures of problem gambling do not necessarily include all aspects of harm people can experience, nor harms caused to others by a person's gambling. While any misapplication of gambling statistics is regrettable, it is also a reflection of a paucity of gambling data which has constrained the ability for fact-based debate. We are glad the Commission is

317 [Q189](#)

318 Higher Education and Research Act 2017, [Section 103](#)

319 Department for Culture, Media and Sport, "[Consultation on the structure, distribution and governance of the statutory levy on gambling operators](#)", 17 October 2023; Gambling Commission, "[Evidence gaps and priorities 2023 to 2026](#)", accessed 23 November 2023

320 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.134

321 *Ibid*, p.137

322 [Q190](#)

323 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.136

324 Letter from Andrew Rhodes, Chief Executive, Gambling Commission, to Dame Caroline Dinenage MP, Chair, Culture, Media and Sport Committee, dated [29 August 2023](#)

taking steps to address this. It will soon launch a new, much more detailed quarterly survey, which will provide a more thorough understanding of the nature and extent of gambling harms.³²⁵

125. We recognise that much of the data relating to gambling is contested, misapplied, or entirely absent, and welcome that actions from the Government’s White Paper and changes to the Gambling Commission will mean that more research evidence can be commissioned. It is vital that any such research is accurate, representative, and understood.

126. We recommend that the Government and the Gambling Commission should work with UKRI to explore how a study similar to the Patterns of Play research could be conducted on a regular basis.

127. Alongside its new gambling survey, the Gambling Commission should publish clear guidance about the interpretation of official gambling statistics.

128. A significant gap in the Commission’s official statistics is the prevalence of gambling-related suicide. There is an established association between problem gambling and suicide, while gambling-related harms can contribute to or accompany other risk factors for suicide such as unmanageable debt, anxiety, and depression. Evidence from Samaritans highlighted the link: for example, that 11% of the more than 25,000 people calling the National Gambling Helpline had experienced suicidal thoughts; and nearly half of the those presenting for treatment at the National Problem Gambling Clinic in London reported having suicidal thoughts.³²⁶ Charles Ritchie described a recent coronial inquest which identified, for the first time, gambling disorder as the medical cause of death.³²⁷

129. Gambling with Lives, which represents families bereaved by gambling-related suicide, have previously estimated that between 250 and 650 deaths by suicide in the UK per year are gambling-related.³²⁸ A more recent evidence review of gambling-related harms published by the Office for Health Improvement and Disparities (OHID) estimated that between 117 and 496 suicides per year in England are associated with problem gambling or gambling disorder.³²⁹ We received evidence from Regulus Partners criticising OHID’s methodology and questioning the validity of this estimate.³³⁰ Andrew Rhodes of the Gambling Commission noted that suicide is rarely caused by one factor, making it difficult to estimate a figure for those where gambling was the dominant cause but he said that the Commission’s new survey would include questions regarding suicidal thoughts and ideation. The regulator has also made a recent change to the Licence Conditions and Codes of Practice for gambling operators, coming into effect in April 2024, which will require an operator to notify the Commission if it becomes aware that a person who has

325 Gambling Commission, [“Gambling Survey for Great Britain Experimental data release—better data will lead to better regulation”](#), accessed 27 November 2023

326 Samaritans ([GAM0034](#))

327 [Q237](#)

328 Letter from Charles Ritchie MBE, Co-Chair, Gambling with Lives, to Dame Caroline Dinanage MP, Chair, Culture Media and Sport Committee, dated [30 September 2023](#)

329 Office for Health Improvements & Disparities, [“Gambling-related harms evidence review: summary”](#), accessed 22 November 2023

330 Regulus Partners ([GAM0099](#))

gambled with it has died by suicide.³³¹ More widely, the Government's five-year suicide prevention strategy for England identifies harmful gambling as one of six risk factors to be addressed as a priority.³³²

130. We welcome that the Government's suicide prevention strategy for England recognises the role harmful gambling can play in suicide risk. *In its response to this report, the Government should provide us with a clear action plan on what it and the Gambling Commission will do to continue to develop understanding of the relationship between gambling and suicide.*

331 Gambling Commission, "[Changes to multi-operator self-exclusion, notification of deaths by suicide and payment services: Consultation Response](#)", accessed 27 November 2023

332 Department for Health and Social Care, "[Suicide prevention in England: 5 year cross-sector strategy](#)", (11 September 2023)

8 A Gambling Ombudsman

131. Gambling consumer complaints can be about a range of matters, including non-payment of winnings by an operator, receiving misleading promotions, or general customer service.³³³ Consumers may also wish to make a complaint if they feel an operator has acted irresponsibly or failed to protect them from gambling-related harm (these are known as social responsibility complaints). Gambling operators are required by the Gambling Commission's Licence Conditions and Codes of Practice (LCCP) to have appropriate complaints handling policies and procedures. This includes providing customers who are dissatisfied with the handling of their complaint with free access to an alternative dispute resolution (ADR) provider approved by the Commission.³³⁴ The Commission currently approves eight such providers, though the largest, the Independent Betting and Adjudication Service (IBAS), handles around 80% of all disputes and most of the remainder are handled by the next largest provider, Ecommerce and Online Gaming Regulation and Assurance.³³⁵

132. The current ADR system is based on the Alternative Dispute Resolution Regulations 2015.³³⁶ These limit the scope of ADR to disputes between consumers and businesses concerning contractual obligations; in the context of gambling, these are the operator's terms and conditions agreed to by the consumer. Gambling operators' social responsibility obligations to prevent harm are not usually within their terms and conditions, and so do not form part of the contract between the operator and a consumer. Social responsibility disputes are therefore out of scope of ADR provision. Consumers can refer such complaints to the Gambling Commission and the Commission may use these complaints to inform its regulatory activity, but it does not adjudicate individual complaints nor provide redress. Fines from the Commission's enforcement action are payable to the Consolidated Fund, and regulatory settlements are usually directed to gambling charities such as GambleAware. This means if a customer's social responsibility complaint cannot be resolved with the operator, the only means of redress is via potentially expensive and time-consuming legal action through the courts.

133. The Gambling White Paper proposes to rectify this gap through the creation of a gambling ombudsman to adjudicate disputes relating to social responsibility. The new ombudsman will also share information about trends in the disputes it handles with the Gambling Commission to inform its regulatory activity.³³⁷ Unlike ombudsman schemes in many other sectors, the gambling ombudsman will not be a statutory body. Its development is industry-led, principally by the Betting and Gaming Council (BGC), the main gambling trade body. The Government says it expects the ombudsman to be established and ruling on disputes within a year.³³⁸ The BGC acknowledged this deadline was challenging but told us they were, as of July, on track to meet it.³³⁹ The BGC argued that a gambling ombudsman should be mandatory for all licensed operators, not only its

333 Gambling Commission, "[Complain about a gambling business](#)", accessed 27 November 2023

334 Gambling Commission, "[Online LCCP 6.1.1 - Complaints and disputes](#)", accessed 27 November 2023

335 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, p.145

336 Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015, (SI 2015/542)

337 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, CP 835, April 2023, pp.150–151

338 Ibid.

339 [Q144–146](#)

membership, and called for it to be made one of the Commission's licensing conditions. The White Paper states that this option will be considered on the delivery of a credible ombudsman scheme. In oral evidence, Andrew Rhodes noted the Commission would only be able to make membership of the ombudsman a licence condition if it was judged to be sufficiently independent and effective.³⁴⁰

134. The intention to create a gambling ombudsman was welcomed across much of the evidence we received.³⁴¹ But the decision not to make it statutory was criticised in some submissions, which questioned whether an industry-established body would be sufficiently independent and seen to be as such.³⁴² In its advice to the Government on the Gambling Act 2005 Review, the Commission recommended that the new ombudsman be established via legislation, not least to ensure its powers have firm legal basis and that it is able to recover its operating costs from gambling operators.³⁴³ The Government ruled out a statutory body on the basis that, as government policy, establishing new arms-length bodies should be a last resort. The White Paper states that if the non-statutory arrangement is not effective, it will legislate to create a statutory ombudsman.³⁴⁴

135. We received evidence from the Ombudsman Association (OA) which highlighted that “ombudsman” is a protected term.³⁴⁵ A gambling ombudsman will only be able to call itself such if it meets the OA's criteria, which include detailed requirements around independence, fairness, and effectiveness.³⁴⁶ The OA noted that while it is preferable to establish an ombudsman with legislation, it is possible to do so without, citing the example of the Rail Ombudsman.³⁴⁷ However, the OA stated that for the gambling ombudsman to be effective, its scope must extend to cover adjudication of all types of consumer complaint in the gambling sector, not only those regarding social responsibility failings, replacing the existing ADR providers.³⁴⁸ The OA argued that having a single point of redress would be clearer for consumers and prevent gambling operators choosing which provider to adjudicate disputes relating to their own service.³⁴⁹ In addition, the gambling ombudsman would have a holistic view of complaints across the sector, making its information-sharing with the Commission more effective.³⁵⁰ For the same reasons, in its advice to the Government, the Commission recommended a single ombudsman to adjudicate all gambling consumer complaints.³⁵¹ The same position was taken by IBAS, who stated their desire to evolve into becoming the gambling ombudsman.³⁵²

340 [Q294](#) [Andrew Rhodes]

341 Betknowmore UK ([GAM0107](#)); Kindred Group ([GAM0108](#)); Professor Jim Orford (Emeritus Professor of Clinical and Community Psychology/Visiting Professor of Gambling Studies at University of Birmingham/King's College London) ([GAM0109](#)); UK Tote Group ([GAM0112](#)); The Gambling Business Group ([GAM0116](#)); Christian Action Research and Education (CARE) ([GAM0118](#)); Mr Jon Bryan ([GAM0128](#)); Money and Mental Health Policy Institute ([GAM0132](#)); Betting and Gaming Council ([GAM0149](#));

342 Gambling Related Harm All-Party Parliamentary Group ([GAM0153](#)); Christian Action Research and Education (CARE) ([GAM0118](#)); British Medical Association ([GAM0140](#))

343 Gambling Commission, *Advice to Government - Review of the Gambling Act 2005*, April 2023, pp. 74–84

344 Department for Culture, Media and Sport, *High Stakes: Gambling Reform for the Digital Age*, [CP 835](#), April 2023, p.151

345 Ombudsman Association ([GAM0136](#))

346 Ombudsman Association, “[Join the Ombudsman Association](#)”, accessed 27 November 2023

347 Ombudsman Association ([GAM0136](#))

348 Ibid.

349 Ibid; Independent Betting Adjudication Service (IBAS) ([GAM0146](#))

350 Ibid.

351 Gambling Commission, *Advice to Government - Review of the Gambling Act 2005*, April 2023, pp. 74–84

352 Independent Betting Adjudication Service (IBAS) ([GAM0146](#))

136. The intention to establish a gambling ombudsman is welcome. However, the Government will not be in a position to judge the effectiveness of the new ombudsman until summer 2024 at the earliest, assuming the process of establishing it remains on track. With the limited time remaining in the current Parliament, it is highly unlikely that the Government will then be able to legislate to create a statutory body if the industry-led ombudsman is not suitably effective or independent. The Government and Gambling Commission must therefore ensure that the new body set up by the industry is fully independent and seen to be such by consumers. *We recommend that the scope of the gambling ombudsman should include all disputes between gambling operators and their customers, replacing the existing gambling ADR providers.*

Conclusions and recommendations

Implementation of the Gambling White Paper

1. It is welcome that the Government and Gambling Commission are proceeding with the various consultations on the White Paper at pace, but delivering its main proposals by summer next year will be challenging and at risk from wider political events. We are concerned that no mention of gambling legislation was made in the King's Speech. *In its response to this report, the Government must set out a detailed timetable for the delivery of the White Paper's proposals, including when relevant primary legislation will be introduced to Parliament.* (Paragraph 13)
2. *Though speed is a necessity, the Government and Gambling Commission must ensure that the White Paper consultations are thorough and receive input from an appropriate range of stakeholders.* (Paragraph 15)
3. We welcome the forthcoming review of the Gambling Commission's fees and the proposal to give the Commission the power to adjust its own fees annually. These will be vital to ensure the regulator is properly resourced to implement the White Paper's reforms and respond to future developments in a rapidly developing online industry. (Paragraph 19)
4. We consider that while it will be important to monitor the size of the black market in response to greater regulation, more pertinent is the fact that, right now, a number of easily-accessible illegal sites are targeting some of those who have self-excluded from gambling. The proposed new power for the Gambling Commission to act against illegal operators is welcome, and the Government must ensure legislation establishing this power is brought forward in this Parliamentary session. *In response to this report, the Government and Gambling Commission must set out how they will address the growing trend of unlicensed gambling sites targeting the self-excluded.* (Paragraph 25)
5. While the black market is a risk the Government and Gambling Commission must be mindful of, it should not deter appropriate regulation of the licensed sector. The debate about the threat posed by the black market partly stems from a lack of understanding about its size. *The Gambling Commission must continue to work to improve its knowledge of the black market and its ability to monitor the number of British consumers gambling with illegal operators. The Commission should set out its plans to do so in response to this report.* (Paragraph 26)

Online gambling protections

6. While we support the principle of financial risk checks, the Government must ensure they are minimally intrusive, and that customers' financial data are properly protected. The Government and the Gambling Commission must also establish what level of "friction" involved in these checks is acceptable for most online gambling customers. *The Gambling Commission should oversee a pilot of the new system*

of checks before it is fully implemented. This should aim to determine customers' willingness to be subject to the checks, and whether they apply at suitable thresholds. (Paragraph 36)

7. Financial risk checks will only be fully effective in preventing harm when they work across all online operators with whom a customer has an account. *In its response to this report, the Government and the Gambling Commission must set out progress in the work to develop a single customer view mechanism.* (Paragraph 37)
8. We support the White Paper's proposals to make online gambling products safer by design. Improving understanding of what affects products' risk of harm should be a priority, and Government should keep its position on a safety testing regime under review in light of further research. *In the short term, as part of its work on safer gambling messaging, we recommend that the Government consider what point-of-sale information should be provided to customers about the risk of specific products and their design features.* (Paragraph 44)
9. The high degree of accessibility of online slots negates the additional protection provided by account-based play. Setting a limit for online slots at the same level as Category B gaming machines, at between £2 and £5, takes account of the risk of harm and will impact only around 1% of gamblers. *We recommend that stake limits for online slots should match those for electronic gaming machines in land-based venues and not exceed £5.* (Paragraph 49)
10. We welcome further work on proactive tools. *Operators should be compelled to proactively encourage customers to set online deposit limits. Where potential harm of financial vulnerability is indicated, online deposit limits should be mandatory.* (Paragraph 51)

Children and young adults

11. Social casino products are the latest example of the convergence between video games and gambling. Though it has responded to the specific issue of loot boxes, the Government must address this wider trend to ensure harms, particularly to children, are prevented. It will be more difficult to do so if gambling continues to be defined solely on the basis of whether a prize from a game can be cashed out. *The Government should review the case for banning children's access to social casino games.* (Paragraph 62)
12. We support the proposed introduction of enhanced online gambling protections for young adults aged 18–24. *The Government, Gambling Commission, and gambling operators must ensure these measures do not unintentionally lead to more adults in this age group giving a higher age at account-creation.* (Paragraph 65)

Gambling advertising

13. There is an urgent need to better understand the effects of gambling advertising on the risk of harm. The evidence for a link between advertising and gambling harm currently appears much stronger than evidence indicating there is a risk of displacement to the black market if gambling advertising were restricted. *The*

Government must commission independent longitudinal research on the link between gambling advertising and the risk of gambling harm, including specifically for women and children. (Paragraph 78)

14. While the existing evidence base does not show a causative link between gambling advertising and harm, it seems clear that advertising encourages participation in gambling and that this effect is more pronounced for children and those vulnerable to gambling harm. Though the White Paper's proposals regarding direct marketing and promotional offers are welcome, the Government should have taken a more precautionary approach to gambling advertising in general—particularly to minimise children's exposure. We do not consider that a complete ban on gambling advertising would be appropriate, but this still leaves scope for further regulation beyond that proposed by the Government. (Paragraph 84)
15. The withdrawal of gambling sponsorship from the front of Premier League players' kit is welcome, but it will not significantly reduce the volume of gambling adverts visible during top-flight matches. *The Government must work with the Premier League and the governing bodies of other sports to ensure that the gambling sponsorship code of conduct contains provisions reducing the volume of gambling adverts in stadia. The Code should also require that a higher proportion of gambling advertising in stadia is dedicated to independently-developed safer gambling messaging. (Paragraph 85)*
16. *The publication of the Code has been delayed repeatedly which is highly regrettable. The Government should require the relevant sporting bodies to publish the Code, incorporating the committee's recommendations, without further undue delay. (Paragraph 86)*

Land-based gambling

17. We support the introduction of cashless payments for electronic gaming machines, provided they are subject to an equivalent level of friction to cash payments. *We recommend that customers who prefer to pay on electronic gaming machines using cash should continue to be able to do so on all machines following any introduction of cashless payments. (Paragraph 97)*
18. The accessibility of online gambling means that some of the supply-level restrictions on the land-based sector are less relevant than when the Gambling Act 2005 was passed. The Committee therefore considers that the White Paper's proposed reforms to modernise land-based gambling are appropriate. *However, in its response to this report, the Government must set out how it and the Gambling Commission will be monitoring the impact of these changes, particularly the increased availability of Category B gaming machines in high street venues, on the risk of gambling harm. (Paragraph 100)*
19. We welcome the proposal to allow local authorities to use cumulative impact assessments (CIAs) in handling gambling premise licence applications. *The Government must ensure councils are given guidance on how CIAs can be applied to gambling premises. It must also ensure this new power is reviewed in during the next Parliament to ensure it is having the intended effect. (Paragraph 103)*

20. The Government must ensure that the new settlement arising from the review of the Horserace Betting Levy mitigates the impact of the White Paper's reforms on the racing industry and ensuring British racing's future. We support the proposal for a distinct approach gambling sports sponsorship and advertising for horseracing and greyhound racing, given both sports' close and long-standing relationships with betting. (Paragraph 108)

Gambling research, prevention and treatment

21. We reaffirm our recommendation for the Government to set out a timetable for the delivery of each of the White Paper's main proposals, including implementation of the statutory levy, in response to this report. *The Government should set out how it will minimise disruption to services currently funded under the voluntary system during the transition to the statutory levy.* (Paragraph 113)
22. We support the proposed structure of the statutory levy. This gives due consideration to the higher overhead costs of land-based operators and the lower rates of problem gambling associated with the sector as a whole, while also ensuring a substantial uplift in funding available for gambling research, prevention and treatment. (Paragraph 116)
23. We support the proposed governance structure for the statutory levy. However, the Government must ensure that levy funds are clearly ringfenced for the purposes of understanding, preventing, and treating gambling harm. It must also use the levy to improve the integration of gambling treatment services across the NHS and third sector. To these ends, we consider that a new national strategy for reducing gambling harms will be warranted. *Following the implementation of the statutory levy, the Levy Board should develop a new national strategy to reduce gambling harms. This strategy should include clear, measurable targets for harm reduction over a defined period.* (Paragraph 121)
24. We recognise that much of the data relating to gambling is contested, misapplied, or entirely absent, and welcome that actions from the Government's White Paper and changes to the Gambling Commission will mean that more research evidence can be commissioned. It is vital that any such research is accurate, representative, and understood. (Paragraph 125)
25. *We recommend that the Government and the Gambling Commission should work with UKRI to explore how a study similar to the Patterns of Play research could be conducted on a regular basis.* (Paragraph 126)
26. *Alongside its new gambling survey, the Gambling Commission should publish clear guidance about the interpretation of official gambling statistics.* (Paragraph 127)
27. We welcome that the Government's suicide prevention strategy for England recognises the role harmful gambling can play in suicide risk. *In its response to this report, the Government should provide us with a clear action plan on what it and the Gambling Commission will do to continue to develop understanding of the relationship between gambling and suicide.* (Paragraph 130)

A Gambling Ombudsman

28. The intention to establish a gambling ombudsman is welcome. However, the Government will not be in a position to judge the effectiveness of the new ombudsman until summer 2024 at the earliest, assuming the process of establishing it remains on track. With the limited time remaining in the current Parliament, it is highly unlikely that the Government will then be able to legislate to create a statutory body if the industry-led ombudsman is not suitably effective or independent. The Government and Gambling Commission must therefore ensure that the new body set up by the industry is fully independent and seen to be such by consumers. *We recommend that the scope of the gambling ombudsman should include all disputes between gambling operators and their customers, replacing the existing gambling ADR providers.* (Paragraph 136)

Formal minutes

Wednesday 13 December 2023

Members present:

Dame Caroline Dinenage, in the Chair

Kevin Brennan

Steve Brine

Clive Efford

Julie Elliott

Rt Hon Damian Green

Simon Jupp

John Nicolson

Gambling regulation

Draft Report (*Gambling regulation*), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 136 read and agreed to.

Resolved, That the Report be the Second Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No.134.

Adjournment

Adjourned till Tuesday 9 January at 9.30 am.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

Tuesday 16 May 2023

Anna Hargrave, Chief Commissioning Officer, GambleAware; **Anna Hemmings**, Chief Executive, GamCare; **Matthew Hickey**, Chief Executive, Gordon Moody [Q1–67](#)

Tuesday 11 July 2023

Michael Dugher, Chief Executive, Betting and Gaming Council; **Wes Himes**, Director of Standards and Innovation, Betting and Gaming Council [Q68–134](#)

Miles Baron, Chief Executive, Bingo Association; **Michael Dugher**, Chief Executive, Betting and Gaming Council; **Wes Himes**, Director of Standards and Innovation, Betting and Gaming Council; **John White**, Chief Executive, Bacta [Q135–167](#)

Tuesday 18 July 2023

Dr Matthew Gaskell, Clinical Lead, NHS Northern Gambling Service; **Dr James Noyes**, Senior Fellow, Social Market Foundation; **Professor Heather Wardle**, Professor of Gambling Research and Policy, University of Glasgow [Q168–232](#)

Will Prochaska, Strategy Director, Gambling with Lives; **Charles Ritchie**, Co-founder and Co-Chair, Gambling with Lives [Q233–268](#)

Tuesday 5 September 2023

Andrew Rhodes, Chief Executive, Gambling Commission; **Sarah Gardner**, Deputy Chief Executive, Gambling Commission; **Tim Miller**, Executive Director for Research and Policy, Gambling Commission [Q269–339](#)

Rt Hon Stuart Andrew MP, Minister for Sport, Gambling and Civil Society, Department for Culture, Media and Sport; **Ben Dean**, Director, Sport and Gambling, Department for Culture, Media and Sport [Q340–395](#)

Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

GAM numbers are generated by the evidence processing system and so may not be complete.

- 1 888 Holdings ([GAM0074](#))
- 2 All Party Parliamentary Group on Gambling Related Harms ([GAM0071](#))
- 3 Anonymised ([GAM0021](#))
- 4 ASA System ([GAM0060](#))
- 5 Ash, Dr James (Reader in Technology, Space and Society, Newcastle University); and Mills, Dr Sarah (Reader in Human Geography, Loughborough University) ([GAM0020](#))
- 6 Association of Police and Crime Commissioners ([GAM0056](#))
- 7 Bacta ([GAM0158](#))
- 8 Bacta ([GAM0063](#))
- 9 Bally's Corporation ([GAM0088](#))
- 10 beBettor Limited ([GAM0040](#))
- 11 Bet Angel ([GAM0155](#))
- 12 Bet365 ([GAM0151](#))
- 13 Bet365 ([GAM0068](#))
- 14 Betknowmore UK ([GAM0107](#))
- 15 Betknowmore UK ([GAM0093](#))
- 16 Betting and Gaming Council ([GAM0149](#))
- 17 Betting and Gaming Council ([GAM0077](#))
- 18 Betting and Gaming Council (Casino sector submission) ([GAM0079](#))
- 19 Bristol Hub for Gambling Harms Research, University of Bristol ([GAM0075](#))
- 20 BritBet Racing LLP ([GAM0141](#))
- 21 BritBet Racing LLP ([GAM0066](#))
- 22 British Beer & Pub Association; and UKHospitality ([GAM0090](#))
- 23 British Horseracing Authority ([GAM0137](#))
- 24 British Horseracing Authority ([GAM0076](#))
- 25 British Medical Association ([GAM0140](#))
- 26 British Medical Association ([GAM0082](#))
- 27 Bryan, Mr Jon ([GAM0128](#))
- 28 Bryan, Mr Jon (Gambling Writer, @JonBryanPoker) ([GAM0096](#))
- 29 BV Gaming Ltd ([GAM0083](#))
- 30 CARE (Christian Action Research and Education) ([GAM0061](#))
- 31 Cash, Mr Barry ([GAM0013](#))
- 32 Channel 4 ([GAM0087](#))
- 33 Cherry, Mr Alister (Housing Officer, North Ayrshire Council) ([GAM0015](#))

- 34 Christian Action Research and Education (CARE) ([GAM0118](#))
- 35 Citizens Advice ([GAM0097](#))
- 36 Deal me out ([GAM0008](#))
- 37 Department for Culture, Media and Sport ([GAM0104](#))
- 38 Department of Trust ([GAM0115](#))
- 39 Department of Trust ([GAM0052](#))
- 40 Donoughue, Mr Steve (CEO/Founder, [www.GamblingConsultant.co.uk](#) Limited) ([GAM0092](#))
- 41 Downs, Dr Carolyn (Senior Lecturer, Lancaster University) ([GAM0113](#))
- 42 Downs, Dr Carolyn (Senior Lecturer, Lancaster University) ([GAM0027](#))
- 43 England and Wales Cricket Board; Football Association; Lawn Tennis Association; Premier League; Rugby Football Union; Sport and Recreation Alliance; and Sports Rights Owners Coalition ([GAM0100](#))
- 44 Entain PLC ([GAM0050](#))
- 45 EPIC Risk Management ([GAM0123](#))
- 46 Faculty of Public Health; Association of Directors of Public Health; and Royal Society for Public Health ([GAM0032](#))
- 47 Federation of Racecourse Bookmakers ([GAM0143](#))
- 48 Federation of Racecourse Bookmakers ([GAM0029](#))
- 49 Flutter Entertainment plc ([GAM0148](#))
- 50 Flutter Entertainment plc ([GAM0045](#))
- 51 Football Index Action Group ([GAM0051](#))
- 52 GamCare ([GAM0038](#))
- 53 GambleAware ([GAM0152](#))
- 54 GambleAware ([GAM0160](#))
- 55 GambleAware ([GAM0163](#))
- 56 GambleAware ([GAM0047](#))
- 57 Gamblers Consumer Forum ([GAM0126](#))
- 58 Gambling Business Group ([GAM0103](#))
- 59 Gambling Commission ([GAM0080](#))
- 60 Gambling Related Harm All-Party Parliamentary Group ([GAM0153](#))
- 61 Gambling Research Group, Bournemouth University ([GAM0117](#))
- 62 Gambling Research Group, Bournemouth University ([GAM0065](#))
- 63 Gambling with Lives ([GAM0067](#))
- 64 Gamesys Operations Ltd ([GAM0154](#))
- 65 GAMSTOP ([GAM0059](#))
- 66 George, Mr ([GAM0134](#))
- 67 Gerada, Professor Dame Clare (Lead of the NHS Primary Care Gambling Service (PCGS)) ([GAM0161](#))
- 68 Government of Gibraltar ([GAM0023](#))

- 69 Greater Manchester Combined Authority ([GAM0150](#))
- 70 Greater Manchester Combined Authority ([GAM0046](#))
- 71 Harris, Dr Andrew (Senior Lecturer/Researcher, Psychology , Nottingham Trent University) ([GAM0026](#))
- 72 Hippodrome Casino Limited ([GAM0131](#))
- 73 Hodgkinson, Mr Raymond ([GAM0122](#))
- 74 Hornle, Professor Julia (Professor in Internet Law, CCLS School of Law, Queen Mary University of London) ([GAM0073](#))
- 75 Independent Betting Adjudication Service (IBAS) ([GAM0146](#))
- 76 Independent Betting Adjudication Service (IBAS) ([GAM0048](#))
- 77 Information Commissioner's Office ([GAM0105](#))
- 78 Institute of Economic Affairs ([GAM0031](#))
- 79 Kindred Group ([GAM0108](#))
- 80 Kindred Group ([GAM0057](#))
- 81 Langdon, Mike ([GAM0139](#))
- 82 Law Society of Scotland ([GAM0044](#))
- 83 Les Ambassadeurs Casino Mayfair ([GAM0024](#))
- 84 Local Government Association ([GAM0114](#))
- 85 Local Government Association ([GAM0039](#))
- 86 Lotteries Council ([GAM0127](#))
- 87 Lotteries Council ([GAM0064](#))
- 88 Macey, Mr Alex (Gambling harms & crime expert, SE) ([GAM0110](#))
- 89 Mcivor, Alan ([GAM0019](#))
- 90 Mellor, Mr Tom ([GAM0120](#))
- 91 Mellor, Mr Tom ([GAM0009](#))
- 92 Merkur UK ([GAM0130](#))
- 93 Merkur UK ([GAM0081](#))
- 94 Metropolitan Gaming ([GAM0095](#))
- 95 Mission and Public Affairs Council, Church of England ([GAM0033](#))
- 96 Money and Mental Health Policy Institute ([GAM0132](#))
- 97 Money and Mental Health Policy Institute ([GAM0058](#))
- 98 Morgan, ([GAM0006](#))
- 99 Morrison, Andrew ([GAM0041](#))
- 100 Nathan-Moss, Mr Craig ([GAM0017](#))
- 101 Northern Ireland All-Party Group on Reducing Harm Related to Gambling ([GAM0101](#))
- 102 Northern Ireland Assembly All Party Group on Reducing Harm Related to Gambling ([GAM0162](#))
- 103 Novomatic UK ([GAM0147](#))

- 104 Novomatic UK ([GAM0037](#))
- 105 Omaze ([GAM0144](#))
- 106 Omaze ([GAM0069](#))
- 107 Ombudsman Association ([GAM0136](#))
- 108 Orford, Professor Jim (Emeritus Professor of Clinical and Community Psychology, School of Psychology, University of Birmingham); Wardle, Dr Heather (Adam Smith Lord Kelvin Reader in Social Sciences, School of Social and Political Sciences, University of Glasgow); and Gaskell, Dr Matthew (Head of Service, NHS Northern Gambling Service, Leeds and York Partnership NHS Foundation Trust) ([GAM0022](#))
- 109 Orford, Professor Jim (Emeritus Professor of Clinical and Community Psychology/ Visiting Professor of Gambling Studies, University of Birmingham/King's College London) ([GAM0109](#))
- 110 Oyston, Mr Chris (Lead Product Developer, CDL) ([GAM0014](#))
- 111 Pabari, MR Sanjay ([GAM0028](#))
- 112 Page, Associate Professor Sarah (Associate Professor Social Justice and Social Learning, Staffordshire University); Pointon, Dr Lucy (Lecturer in Criminology, Staffordshire University); Turner, Associate Professor Jo (Head of Department in the School of Justice, Security and Sustainability and Associate Professor Criminology, Staffordshire University); and Plimley, Sarah (Lecturer in Policing, Staffordshire University) ([GAM0142](#))
- 113 Page, Sarah (Senior Lecturer Criminology / Action on Poverty, Staffordshire University); Pointon, Lucy (Lecturer in Criminology, Staffordshire University); Plimley, Sarah (Lecturer in Policing, Staffordshire University); and Turner, Associate Professor Jo (Interim Head of Law, Staffordshire University) ([GAM0094](#))
- 114 Parent Zone ([GAM0145](#))
- 115 Parent Zone ([GAM0042](#))
- 116 Peers for Gambling Reform ([GAM0125](#))
- 117 Peers for Gambling Reform ([GAM0072](#))
- 118 People's Postcode Lottery ([GAM0084](#))
- 119 Primary Care Gambling Service ([GAM0165](#))
- 120 Professional Gamblers Association; and Professional Gamblers Association ([GAM0129](#))
- 121 Rank Group ([GAM0111](#))
- 122 Rank Group Plc ([GAM0049](#))
- 123 Regulus Partners ([GAM0099](#))
- 124 Samaritans ([GAM0034](#))
- 125 Sargent, Mr Steven ([GAM0106](#))
- 126 Sargent, Mr Steven ([GAM0005](#))
- 127 Shaw, Mr Jonathan ([GAM0124](#))
- 128 Smailes , Mr Peter (Retired , Retired) ([GAM0135](#))
- 129 Social Market Foundation ([GAM0055](#))
- 130 Sport and Recreation Alliance and the Sports Betting Group ([GAM0086](#))
- 131 Tackling Gambling Stigma ([GAM0078](#))

- 132 The Association of Police and Crime Commissioners ([GAM0157](#))
- 133 The Bingo Association ([GAM0159](#))
- 134 The Bingo Association ([GAM0091](#))
- 135 The Christian Institute ([GAM0085](#))
- 136 The Gambling Business Group ([GAM0116](#))
- 137 Tolson, Mr Neil ([GAM0035](#))
- 138 Tolson, Mr Neil (Retired FCMA, CMI) ([GAM0119](#))
- 139 UK Tote Group ([GAM0112](#))
- 140 UK Tote Group ([GAM0036](#))
- 141 Wardle, Dr Heather (Adam Smith Lord Kelvin Reader in Social Sciences, University of Glasgow); Reith, Professor Gerda (Professor of Social Sciences, University of Glasgow); Bunn, Dr Chris (Senior Lecturer, University of Glasgow); and Dobbie, Dr Fiona (Senior Lecturer, University of Edinburgh) ([GAM0062](#))
- 142 Webb, Derek ([GAM0054](#))
- 143 Webb, Mr Derek ([GAM0156](#))
- 144 Xiao, Mr Leon Y. (PhD Fellow, IT University of Copenhagen) ([GAM0025](#))
- 145 YGAM ([GAM0138](#))
- 146 YGAM ([GAM0070](#))
- 147 Yield Sec ([GAM0164](#))
- 148 Zarb-Cousin, Mr Matt ([GAM0053](#))
- 149 Zendle, Dr David (Lecturer, University of York) ([GAM0098](#))

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the publications page of the Committee's website.

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5th	Economics of music streaming: follow-up	HC 874
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8th	Appointment of Richard Sharp as Chair of the BBC	HC 1147
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10th	Connected tech: smart or sinister?	HC 157
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13th	Draft Media Bill: Final Report	HC 1807
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1st Special	Major cultural and sporting events: Government Response to Committee's Ninth Report of Session 2021–22	HC 452
2nd Special	Influencer Culture: Lights, camera, inaction?: ASA System and CMA Responses to the Committee's Twelfth Report of Session 2021–22	HC 610
3rd Special	Influencer Culture: Lights, camera, inaction?: Government Response to the Committee's Twelfth Report of Session 2021–22	HC 687
4th Special	Rt Hon Nadine Dorries MP	HC 801
5th Special	Promoting Britain abroad	HC 1103
6th Special	Reimagining where we live: cultural placemaking and the levelling up agenda	HC 1104
7th Special	What next for the National Lottery?: Government and Gambling Commission Responses to the Committee's Fourth Report	HC 1208
8th Special	Economics of music streaming: follow-up: Government Response to the Committee's Fifth Report	HC 1245

Number	Title	Reference
9th Special	The sustainability of local journalism: Government Response to the Committee's Seventh Report	HC 1378
10th Special	Appointment of Richard Sharp as Chair of the BBC: Government Response to the Committee's Eighth Report	HC 1641
11th Special	Football Governance: Government Response to the Committee's Ninth Report	HC 1850
12th	What next for the National Lottery?: National Lottery Distributors' Response to the Committee's Fourth Report	HC 1913

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6th	Pre-appointment hearing for Chair of the Charity Commission	HC 261
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11th	Pre-appointment hearing for Chair of Ofcom	HC 48
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1st Special Report	The future of public service broadcasting: Government Response to Committee's Sixth Report of Session 2019–21	HC 273
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3rd Special Report	Sport in our communities: Government Response to Committee's Fourth Report	HC 761
4th Special Report	The future of public service broadcasting: Ofcom Response to Committee's Sixth Report of Session 2019–21	HC 832
5th Special	The Draft Online Safety Bill and the legal but harmful debate: Government Response to the Committee's Eighth	HC 1039

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Number	Title	Reference
1st	The Covid-19 crisis and charities	HC 281
2nd	Misinformation in the COVID-19 Infodemic	HC 234
3rd	Impact of COVID-19 on DCMS sectors: First Report	HC 291
4th	Broadband and the road to 5G	HC 153
5th	Pre-appointment hearing for Chair of the BBC	HC 1119
6th	The future of public service broadcasting	HC 156
1st Special Report	BBC Annual Report and Accounts 2018–19: TV licences for over 75s Government and the BBC's Responses to the Committee's Sixteenth Report of Session 2017–19	HC 98
2nd Special Report	The Covid-19 crisis and charities: Government Response to the Committee's First Report of Session 2019–21	HC 438
3rd Special Report	Impact of Covid-19 on DCMS sectors: First Report: Government Response to Committee's Third Report of Session 2019–21	HC 885
4th Special Report	Misinformation in the COVID-19 Infodemic: Government Response to the Committee's Second Report	HC 894