

Rank Group – Written evidence (GAM0029)

Questions

The Gambling Act 2005

1. Are the three primary aims of the Gambling Act 2005 (to prevent gambling from being a source of crime or disorder, to ensure that gambling is conducted in a fair and open way, and to protect children and other vulnerable persons from being harmed or exploited by gambling) being upheld?

The 2005 Act triggered a seismic change in the gambling landscape, some of it by design, some of it impossible to foresee (as a result of societal and technological changes and developments). To a large extent, the broad deregulation triggered a new environment in which operators were encouraged to compete, and the industry *did* compete, with considerable appetite.

One of *the* most significant impacts was on the **visibility** of gambling to the wider public: both the tone and especially the *volume* of advertising reached audiences – at an unprecedented scale. With the increased visibility came a (albeit and understandably) lagged/delayed reduction in levels of trust shown by the public towards the industry. This is the landscape in which we now operate.

Crucially, however, the 2005 Act did *relatively* little to herald far-reaching changes for the casino and bingo industries, namely the two primary verticals for the Rank Group.

Notwithstanding that general point, and based upon the evidence available, we believe the primary aims are being upheld.

Specifically regarding crime and disorder, at Rank and across the industry, we have a strong track record of working with police forces and law-enforcement bodies to address potential criminal activity and reduce risk and occurrence. More broadly, since the passing of the 2005 Act there is no evidence that gambling-related crimes have increased.

Specifically regarding fair and open operations, earlier this year, the CMA & Gambling Commission concluded (closed) an investigation into online gambling, initiated in 2016 by the Competition and Markets Authority ('CMA') in association with the Gambling Commission, which – at the time – highlighted a number of concerns in relation to "inadequate or unclear information", including treatment of account dormancy charges, firms' restrictions on withdrawals and the restriction of certain customers' play strategies.

Specifically regarding protecting children and other vulnerable people, we return to one of our opening observations which relates to the prevalence of advertising – a direct result of the 2005 Act – and believe that the exposure of advertising to children who especially watch live sports is a core issue in need of addressing.

The following data points regarding children gambling were presented in February, 2019, by Rank, at an APPG on the subject of "Are children really gambling and, if so, what should be done about it?"

- 39% of 11-to-16-year-olds are believed to have gambled at some point in 2018, **the overwhelming majority of which appears to be legal** private betting or gaming (e.g. card games) with family and friends; National Lottery products; and low-stake gaming machines in arcades.
- Reported rates of gambling by children have declined significantly in recent years. Between 2011 and 2017, past-week gambling by 11-to-15-year-olds fell from 23% to 12%.
- Estimates of problem gambling amongst 11-to-15-year-olds have been published since 2014. The reported rate of problem gambling in this age group was 0.7% in 2014; 0.6% in 2015 and 2016; and 0.9% in 2017.

The unreliability of data, however, is particularly unhelpful: for example, we are sceptical of the results of the Gambling Commission's youth gambling survey (2018) which appears to suggest an increase from 0% to 2% of children aged 11-15 who have played casino games in a casino. Given that the adult rate is just 3% and given that – crucially – the casino sector has the strictest/highest entry controls in the sector, the figure cannot be considered legitimate and is far more likely to be a result of misinterpretation of questions by children.

Across our bingo estate, irrespective of the law which allows children to enter the premises, we voluntarily deploy a *Think 21* policy in keeping with our overall approach to safer gambling.

2. What changes, if any, are required to bring the Act up to date with new technology and the latest knowledge about how gambling harm is distributed?

The Act need not address technological developments which are sufficiently captured by changes to the LCCP.

Instead, it is worth reflecting on how the Act has empowered and emboldened the regulator (The Gambling Commission) to assume the powers of a quasi-legislator. Prior to the 2005 Act there existed a two-way approach to regulation which saw both a tightening and a loosening of specific aspects of legislation. The shift in powers to the regulator has narrowed the appetite and incentive for customer-oriented *deregulation*. It is crucial that this one-way direction of travel is reviewed.

It is worthwhile reminding ourselves of the most recent DCMS (2018) *"Government response to the consultation on proposals for changes to Gaming Machines and Social Responsibility Measures"*, in particular the following (bold font added by Rank):

"We accept that machine allocations are, by international standards, low for this sector [land-based casinos]; and unlike other venues, the total number of casinos is capped, which also limits the total possible number of machines available across the casino estate in Britain. We are aware that pilots of further player protections are underway and encourage casinos to work with the Commission on measures to enhance both player protections and evaluation strategies. If additional measures are put in place to manage the risk of gambling-related harm effectively, **we will consider looking again at the question of allocations."**

The DCMS appears sympathetic to the peculiarities of the existing legislation and Rank believes that a review of the legislation regarding the harmonisation of the 1968 and 2005 Gambling Acts in relation to slot machine numbers in casinos remains well overdue. The current situation of differing Acts is incompatible with a customer-oriented approach to responsible gambling, is anachronistic, and we believe that proposed changes – which would be modest in the wider landscape of the industry – would help to create a more vibrant, responsible and contemporary solution for operators and better meet the demands of customers.

Where casinos have been able to increase machine numbers in the past (up to 80 slots per premises and up to 150 in large casinos, under 2005 legislation), there have been no suggestions of negative consequences. Regrettably, the majority of land-based casinos (well over 90% of premises) are licensed under the 1968 Act (up to 20 slots per premises), irrespective of size and customer traffic.

In real terms, this archaic and arbitrary limit results in less than 2% of the total number of land-based slot machines being found in land-based UK casinos. We firmly believe that casinos are, in the main, destination-venues rather than convenience premises and so the absurdity of the existing legislation is even more startling. Destination-venues ought to be precisely where gaming machines can be most responsibly enjoyed.

The voice of the customer here is crucial: a customer who plays machines in a casino is unlikely to be at greater risk if there are 80 machines in that casino than if there are 20 (assuming, sensibly, that supervision levels are sustained appropriately).

Currently, customers endure restricted choice as casino machines supply in Great Britain is limited and cannot sustain or support a competitive market amongst suppliers.

In the small number of (2005 Act) casinos that have been able to increase allocations above the max-20-machines limit (to maximums of 80 or 150 machines), no concerns have been expressed by local licensing authorities or the Gambling Commission. In short, the cap makes little sense for customers, operators, local councils or regulators, and is archaic in comparison with more enlightened international jurisdictions.

It is also possible that the current, aforementioned restrictions have a number of negative unintended consequences:

1. Encouraging persistent play (through a fear of losing one's place at a machine);
2. Increasing staking levels (through absence of choice of lower stakes games).

The existing Act also deprives customers of the choice to readily enjoy electronic versions of casino table games in land-based premises. The Act demands that actual physical events (rather than a random number generator) are required, in effect restricting casinos to offering electronic roulette, but making electronic blackjack (for example) more difficult to offer. Adopting a relentless customer-oriented approach to this thinking, it makes little sense: we cannot identify any

reason why a customer is safer or receives any benefits or protections from a physical event rather than a RNG.

An Act fit for the modern-day customer would enable casinos to offer a wider range of casino games via electronic terminals, complete with lower minimum staking levels than currently required on live tables (as a result of higher costs of staffing live tables).

Finally, regarding the customer experience in casinos, only 8 out of the 152 licensed operating casinos (GC data) are able to offer sports betting. Consider international comparisons whereby some jurisdictions allow sports betting *only* in casinos. Our casinos are able to show sports, are destination-venues, offer appropriate levels of supervision, and our colleagues are frequently aware that customers are betting – using other sportsbook apps – whilst on our premises.

More broadly, with over 8000 LBOs (betting shops) offering sports betting, but only 150 licensed casinos, the opportunity for casinos to offer sports betting would have a modest, even minimal, impact on the overall nationwide accessibility of sports betting in licensed premises. We are also conscious that betting shops – as an overall number – are likely to decline, and providing sports betting in a few more locations is likely to increase customer choice without any realistic risk of widespread negative impact.

In the eight casinos where sports betting has been available, we are not aware of any issues regarding social responsibility. Reform in the wider casino landscape is surely overdue.

The upsides to reform are plentiful: the impact on tourism will be significant. At a time when overseas investment and the appeal of Great Britain as a go-to destination is increasingly in the spotlight, bringing casinos more into line with comparable international jurisdictions is likely to be welcomed. Casinos have long been attractive to tourists, and enlightened reform would add to this appeal, along with the wider benefits to the UK economy.

An EY Report (2016) into the casino sector estimates that the harmonisation of the 1968 and 2005 Acts in regards to gaming machine numbers would yield £90m of capital investment, create hundreds of jobs, and deliver additional tax revenues of c. £65 million. Rank's view is that this report significantly understates the economic benefits that would be generated as a consequence of slots harmonisation.

At a time when the casino sector is uniting behind a shared desire to dial up the entertainment merits of our premises (rather than a purely transactional venue), the investment opportunity offered by positive regulatory change is significant and would see more appealing destinations emerge, with wider appeal to local communities and stakeholders, all the while underscored by the highest industry levels of safer gambling practice.

In both the casino and the bingo environment, we would encourage a review of the statutory instrument preventing the use of debit cards on slots. Increasingly, we are moving to a 'cashless' society and yet the restrictions on cashless access to slots are failing to keep pace, resulting in:

- Reduced customer choice for players

- Our venues lacks the cashless solutions found elsewhere in the entertainment industry and are consequently less appealing to customers
- Bingo halls, in particular, house a disproportionate level of cash on the premises relative to other gambling establishments), thereby increasing the security risk to colleagues

We are overly reliant on cash, in spite of the fact that cash provides the least-effective way of tracking customer play.

3. Is gambling well regulated, including the licensing regime for both on- and off-shore operations? How successfully do the Gambling Commission, local authorities and others enforce licensing conditions including age verification? What might be learned from comparisons with other regulators and jurisdictions?

The balance between, on the one hand, implementing and adhering to the licensing objectives in the 2005 Act, and on the other hand, allowing a competitive, responsible and thriving industry to flourish, is the key to identifying successful regulation. We strongly believe that the regulator should be addressing both sides of this coin.

Britain has, by reputation, low levels of illegal gambling and relatively low levels of problem gambling by international standards.

Internationally, casinos are viewed as a key component of the tourism industry and taxed accordingly (and less punitively). We think this represents an enlightened approach that ought to be adopted in the UK.

4. Should gambling operators have a legal duty of care to their customers?

The licensing objectives in the 2005 Act set out clear statutory duties for operators. We take the responsibility of complying with those objectives extremely seriously, as evidenced by continued significant investment in a range of safer gambling initiatives and tools. Across the Rank estate, we pride ourselves on the level of responsibility we show to our customers and believe that an environment in which both the operator and the customer fulfil their responsibilities around play and engagement is the safest and healthiest environment in which to enjoy gambling.

If such an additional duty of care were to be introduced, we would be concerned as to how it could be applied in a manner that was fair, just and reasonable. We do not regard responsibility in this area as sitting solely with the operator and would be concerned that spurious claims would be brought by customers who lose, but for whom there are no concerns about the nature of their play (either from us or them or even the regulator), tying up resource and monies that could be focused on research, education and treatment instead on defending court cases and legal fees.

We also believe that it raises a number of complex questions, including in particular how it would sit alongside freedom of choice for customers, privacy etc, and how the role and findings of the regulator would sit versus the courts (as opposed to the current regime where their roles are clear and the court remains the backstop behind the legislative process). Without answers to these

questions, its introduction could have significant and disproportionate impact on the people who do safely enjoy gambling, the industry itself and its employees.

Finally, we believe that if gambling operators were to have a duty of care to their customers, this must raise questions about whether a duty of care should also be owed to consumers by other industries with similar issues in relation to addictive behaviours, for example gaming companies (from the perspective of children) or the alcohol industry (from the perspective of vulnerable adults).

Social and economic impact

5. What are the social and economic costs of gambling? These might include costs associated with poor health and hospital inpatient services; welfare and employment costs; the cost of benefit claims; lost tax receipts; housing costs through statutory homelessness applications; and criminal justice costs.

In 2016, the Institute for Public Policy Research ('IPPR') published a report (commissioned by the Responsible Gambling Trust [now GambleAware]). The study defined fiscal costs as "a transfer from a government entity to a non-government entity: in this case an individual, or else the sum of individuals, who are problem gamblers", concluding that the excess cost to the state of people who were problem gamblers was likely to fall within the (extremely wide) range of £260m to £1.16bn. As an observation, it has been very rare to see commentators reflect this range in recent discourse, with references only to the upper limit. At best, this is misleading.

In addition, we note that the study attempts to provide estimates of excess costs related to problem gambling; it does not comment (and cannot comment) on costs arising *as a result of* problem gambling.

The IPPR's report highlights the absence of any robust framework for assessing social and economic costs and further reinforces the dangers of jumping on upper-end numbers as 'facts'.

Casinos, as destination venues and by way of design and inherent supervision, are also well-placed to mitigate harm through a combination of entry controls, high levels of supervision via CCTV, player tracking through mandatory AML provisions and the presence of non-gaming diversions (restaurants etc) to self-regulate levels of play.

Within the bingo ecosystem, an Ipsos MORI report (July 2016) found levels of problem gambling to be relatively low (2.5% of regular players) when compared with other forms of 'gambling'. We do not advocate "safer than elsewhere" as a particularly appealing or compelling message for an industry that ought to be celebrating the appeal of gambling to responsible adults, but data is relatively scarce and, in the case of bingo, there is merit in amplifying these numbers in conjunction with the significant benefits that bingo provides to individuals and communities (see Q6).

6. What are the social and economic benefits of gambling? How can they be measured and assessed?

There are many social and economic benefits related to gambling.

Economically, the tax contributions of UK operators to government revenues is enormous and have markedly increased since the 2005 Act came into existence.

At Rank, in the most recent financial year (2018/2019), we made a Group Profit After Tax (PAT) of £29.1 million but paid £191.1 million in tax. In short, we paid over six and half times more in tax than we made in group profit after tax. Of this, £159.0 million was paid in UK tax and, as such, it is entirely plausible to reflect on the biggest beneficiary of the 2005 Gambling Act as being the UK government.

The most important social benefit, at an industry-wide level, is that of consumer benefits (including -being effects, enjoyment, social and community engagement.) This is the critical story that the industry has failed to successfully share in recent years, but is no less relevant today than in the past.

Allowing adults to engage in legal pursuits that they wish to and find enjoyable is the very essence of a social benefit. Gambling exists as a direct response to consumer needs which, whilst unappealing to some elements of the population for various reasons, remains entirely legitimate entertainment.

Recent studies have found not only higher levels of well-being amongst recreational gamblers than non-gamblers, but also that well-being increased with gambling engagement – except in those cases where problem gambling occurred.

There have been a number of studies of self-reported happiness and gambling amongst elderly people in care homes. These studies have consistently demonstrated higher levels of happiness amongst those who gambled regularly and higher levels of happiness while gambling by all participants.

Specifically for bingo, a recent University College, London (2019) study (and reported in various news outlets, August 2019) points to the social benefits of playing land-based bingo, with other people, to protect against the development of dementia. The study into “cognitive reserve” reveals a compelling contrast to the scourge of loneliness in society, especially amongst older-age groups, and builds on the concept of social engagement as a means of delaying (the symptoms of) dementia.

This reinforces the Ipsos MORI (see Q5) report which addresses the concept of bingo halls as a key community outpost for customers for whom “*life circumstances limit their ability to participate in other leisure pursuits*”. These customers also benefit from reduced isolation and loneliness, and crucially the report notes that there is no direct correlation between the duration of time spent in a bingo club and gambling related harm.

Bingo is often perceived – accurately in our experience – as a social pastime. The best bingo halls provide customers with a sense of community and togetherness. A University of Kent (2016) report talks of bingo being a “*brilliant way to bring people together*” adding credence to our belief that bingo is unique in its social nature and worthy of recognition in this regard.

Casinos can be classified as an export business. Business is conducted in casinos, relationships are forged and fostered and, particularly in London casinos, gambling by non-British citizens generates a net employment and output contribution. As destination-venues, the appeal of casinos to attract

customers beyond the immediate local vicinity (including overseas tourists) not only for gaming but also for the amenities offered in casinos (including dining) helps to drive wider spend and also sustains ongoing high levels of capital investment.

7. Is the money raised by the levy adequate to meet the current needs for research, education and treatment? How effective is the voluntary levy? Would a mandatory levy or other alternative arrangement be more productive and effective? How should income raised by a levy be spent, and how should the outcome be monitored? What might be learned from international comparisons?

The entire mandatory levy issue revolves around the critical need for an independent commissioning body, like the most successful levies elsewhere in the betting and gaming sector, and one which fulfils its sole brief of fairly collecting and distributing RET funds. Its role should never be to act as lobbyist nor to drive media campaigns, support prohibition agendas or to deviate from its role.

In recent years, voluntary contributions from licensees to GambleAware, including from the Rank Group and including funds made available to GambleAware via voluntary regulatory settlements, have delivered a surplus to the budget set out by the three-year National Responsible Gambling Strategy (NRGS). If we are considering whether sufficient funds have been made available by the industry to meet the RET requirements identified by the RGSB/ABSG, then the answer is clearly yes.

In short, the voluntary system of donations has been relatively successful in achieving funding targets (regardless of whether those targets have been accurately pegged).

On top of these payments, more funds have been provided by operators, including Rank, for the ongoing GambleAware/Public Health England *Bet Regret* campaign. Rank have also made additional payments this year to Gordon Moody, direct to GamCare, and invested in our nationwide *Keep It Fun* messaging.

Funds derived from regulatory settlements are, looking forward, impossible to budget for and foresee, but it remains the case that there is a sizeable reserve of unallocated funds currently available to achieve the aims of the National Strategy to Reduce Harms.

How much is required?

Returning to our opening observations, an independent body could determine this most accurately, but we would welcome a robust needs-based assessment to take place for RET services. Frankly, advocating a mandatory Levy before scoping the issue and the need, puts the cart before the horse and will, most likely, result in guesswork, squandered funds and expensive governance costs.

Ultimately we accept that an increase in payments may well be required over time but believe that identifying the actual 'need' is a much more sensible approach to take than simply providing a round number and then back-filling the need.

Rank has a long-standing track record in fulfilling our voluntary obligations to funding GambleAware, and our additional funding to other providers and bodies, on top of the minimum expectation.

As part of our membership of the Senet Group, we have reiterated our commitment to providing increased provision for those affected by gambling-related harm to gain access to gambling treatment and support services.

Do we need a mandatory levy?

As outlined earlier in this question, the current system is clearly working in achieving official targets for funding RET and the effectiveness of a voluntary system is increasing and improving.

It is unproven that a mandatory levy, based upon a scientific assessment of need, will definitively lead to an increase in levels of funding, but we do not object to further exploration of an appropriately-costed mandatory levy.

Should a mandatory Levy be deemed unavoidable, the level at which it is set becomes critical. We do not subscribe to any operator-moves to start with a big number and then attempt to back-fill the need. A Levy rate ought to be determined, free from political influence or vested interest, in accordance with the agreed and transparent needs-based assessment.

In summary, we continue to believe in the merits of a voluntary system but are not opposed, in principle, to a mandatory system.

We strongly believe that any review of RET funding (and in particular any structural changes to the current system) should at least consider why it is deemed inappropriate to use public finances (and in particular excess taxation generated by our businesses) for this purpose.

Who should pay?

A frequently overlooked element in the wider discussion of industry contributions to RET is the role and quantum of general taxation. A "polluter pays" principle is prevalent in the gambling debate despite this being contrary to other, broader public health approaches, where RET is funded from general taxation.

The gambling industry already contributes around £3bn a year in duties, around £2bn of which relates to non-lottery products.

As outlined in Q6, at Rank, in the most recent financial year (2018/2019), we made a Group Profit After Tax (PAT) of £29.1 million and paid £191.1 million in tax (£159.0 m in the UK), thereby paying over six and half times more in group tax than we made in group profit after tax.

If we assume that gambling duties are set higher than the standard rate of VAT because there is an appreciation of social and economic harms (an assumption that we acknowledge) we believe it is logical that the excess tax revenue might be allocated towards addressing those harms.

At Rank, our London Grosvenor casinos pay relatively very high levels of gambling duties (up to 50% of our revenue in gaming duty) and believe there is considerable merit in discussing what proportion of these tax receipts are allocated to treatment services.

8. How might we improve the quality and timeliness of research in the UK? What changes, if any, should be made to the current arrangements for funding, commissioning and evaluating research in the UK? What might be learned from international comparisons?

The current stigma against industry involvement in research is unhelpful both for researchers reluctant to work in this space and operators seeking to make improvements in this area. The research space has become overly-politicised and we would welcome a correction to the landscape in which research is published and debated in the appropriate academic, objective and science-based forums rather than in mainstream media articles.

We would like to see the development of a proper research strategy in association with operators and treatment providers. As part of this approach, attempts should be made to 'pool' findings and identify practical consequences.

To date, there has been almost no official research carried out on consumer benefits and positive play; and it has been indicated that the industry would be required to undertake this work. For such research to have impact it ought to take place in a way that allows it to be viewed on the same footing as research into harm. A balancing of the weights is required.

9. If, as the Responsible Gambling Strategy Board (RGSB) has suggested, there is limited evidence on which to base sound decisions about gambling by children and young people, what steps should be taken to rectify this situation?

A review of data is important here:

In our Mecca bingo halls, current legislation permits us to allow U18s to enter the premises; in spite of this and in accordance with local authority requirements, we operate a strict Think 21 policy in our clubs (Think 25 in Scotland).

Britain's casinos receive c. 20 million customer visits per year. According to the GC, in the 12 months to September 2018, there were 52 incidences in casinos where individuals were unable to verify their age. It is possible that some (but cannot be assumed that all) of these incidences involved individuals aged under 18. We aspire to a target figure of 0% but acknowledge that the figures equates to 0.3 incidents per casino in Great Britain and/or 0.0002% of total attendance.

To provide some comparison to the GC data, Grosvenor's own recorded incidences of individuals being unable to verify their age have shown a decline in the last financial year, from 42 incidences in FY 17/18 to 34 in FY 18/19. Again, it is possible that some of these incidences involved individuals aged under 18.

10. Is enough being done to provide effective public education about gambling? If not, what more should be done?

As a member of the Senet Group, we can point to the ongoing 'When the Fun Stops Stop' and (not so long ago) 'Bad Betty' campaigns as high-profile pieces of work in this space. At time of writing, GambleAware's 'Bet Regret' campaign continues to air prominently on TV.

We do not believe, however, that it makes sense to run public health-style TV advertising campaigns to refrain from gambling on sport whilst simultaneously

allowing adverts promoting gambling on sport. This is the end-result of an indecisive approach to TV advertising.

The relationship between raising awareness and influencing behaviour is particularly precarious when it comes to campaigns targeting children. We believe there is too much noise (rather than clarity) when it comes to the volume of public health campaigns (to raise awareness of risks at a population level), operator-led campaigns (to encourage moderation by their customers) and treatment campaigns (to encourage help-seeking).

11. Are the services available for the treatment and support of people at risk of being harmed by gambling sufficient and effective? How might they be improved? What steps might be taken to improve the uptake of treatment, particularly among groups who are most likely to experience harm from gambling and least likely to seek help?

As gambling operators, we are conscious not to play the role of treatment experts whom, we believe, are far better positioned to contribute to this question, but believe the behaviours, root issues, symptoms, consequences and severity of gambling-related harm vary significantly between diagnosed individuals thereby rendering a single view of 'treatment' short-sighted.

Providers such as GamCare, in particular, are better placed to articulate this answer with a national treatment provision approach.

It is commonly stated that only 2% to 3% of problem gamblers receive treatment, but these estimates ignore therapy services provided by Gamblers Anonymous, by private organisations, by the National Problem Gambling Helpline and by community and health groups.

The ambition should be to provide treatment and support based around the needs of the individuals concerned. Research has indicated that, for some, reasonably simple helplines can be effective in achieving moderated behaviour and/or abstinence.

We advocate encouraging healthy approaches to gambling at Rank and providing customers with tools to manage their play, and anticipate that, over time, this will reduce the number of individuals who require help in relation to their gambling.

12. What steps should be taken better to understand any link between suicide and gambling?

The current data in this space is inadequate and, for such an understandably and rightly sensitive topic, in need of redress.

The most widely-quoted statistics – in short, the suggestion that c.700 suicides a year were a direct result of problem gambling – are based on a Hong Kong story that is over a decade old. Hong Kong and Great Britain were (and remain) very different cultures (not least the suicide rate in Hong Kong which was, at the time, 7 times higher than in GB). Extrapolating data without this context is both ill-advised and potentially dangerous.

It seems perfectly reasonable that more contemporary research, possibly in alliance with The Samaritans, could be commissioned, published, acknowledged

and embraced by all elements of the industry and by government who should be guided by the science and data rather than by anything else.

13. The RGSB has said that by not taking action to limit the exposure of young people to gambling advertising "we are in danger of inadvertently conducting an uncontrolled social experiment on today's youth, the outcome of which is uncertain but could be significant." Do you agree? How should we make decisions about the regulation of gambling advertising? What might be learned from international comparisons?

As articulated in previous questions, we believe that the primary reason for the prevalence of anti-gambling industry related sentiment in the UK is both the volume and the tone of gambling advertising in and around televised sports events. We broadly support the principle of industry self-regulation, providing that self-regulation goes far enough. Where it does not, regulation is required.

Rank does not currently engage in TV advertising around live sports events and recently (2018) took the decision to refrain from Premier League football shirt sponsorship. We believe that we are conscious of the critical issues that the industry is responsible for in the current climate.

A crucial distinction to make here is the fact that only companies licensed by the Gambling Commission may advertise in Britain, providing an important means for customers to identify legal from illegal operators. Consumption of live sport, however, extends far beyond TV advertising and includes shirt sponsors in football along with perimeter boards, none of which can be seen in isolation from traditional advertising.

14. Gambling is becoming an integral part of a growing number of sports, with increasingly close relationships between operators and sports clubs, leagues and broadcasters. What are the risks attached to this?

The relationship between gambling and sports is not new. In some sports (most notably horseracing and greyhound racing) betting continues to underpin the core finances and is the *raison d'être* of the sport, providing significant financial resources for professional and grass roots sport in Great Britain.

Beyond these sports, it is important to note that a large part of gambling sponsorship is undertaken by non-UK facing businesses, an argument articulated by Rank at the APPG (Underage Gambling) in February 2019. For example, for the 2019/20 English Premier League season, nine of the ten gambling shirt sponsors are largely or entirely non-UK facing brands.

Rank (via our Grosvenor Casinos brand) were the shirt sponsor of Fulham FC until 2018; it is a commercial arrangement that we terminated later that year and we no longer engage in any sponsorships of this kind.

15. How are new forms of technology, including social media, affecting children's experiences of gambling? How are these experiences affecting gambling behaviour now, and how might they affect behaviour in the future?

NO RESPONSE.

16. The legal availability of certain forms of commercial gambling to under-18s in Great Britain is unusual by international standards and has been described as an 'historical accident'. Should young people between 16 and 18 be able to purchase National Lottery products, including draw-based games, scratch cards and online instant wins?

NO RESPONSE.

17. Should children be allowed to play Category D games machines (which include fruit machines, pushers and cranes)?

NO RESPONSE.

18. The restrictions on society lotteries were relaxed by the Gambling Act 2005, and there is concern that some of them are effectively being taken over by larger commercial lotteries. Is this concern well founded? If so, what should be done?

NO RESPONSE.

19. Should changes be made to the statutory regime governing the National Lottery, to bring it into line with the regime governing operators of other lotteries?

NO RESPONSE.

5 September 2019