

Please ask for:
Direct line:
Email:



Date: 9th December 2016



By e-mail:



Dear Sir/Madam,

DCMS review of Fixed Odds Betting Terminals

I am writing to formally submit comments from Leicester City Council in relation to the departmental review of Fixed Odds Betting Terminals, which is an issue which has been considered in detail at scrutiny and executive level by the council. Our comments are set out in response the questions posed in the consultation document.

Question 1

Maximum stakes for B2 machines (fixed odds betting terminals) should be reduced further to £2 per bet. This will help to reduce the impact of compulsive gambling on individuals. It is the position held by Leicester City Council, which supports the Local Government Association's position on the limit to FOBT stakes. Sessions by one player on FOBTs should also be timed out after a time to be specified. This might be 30 minutes, with a cooling off period of (say) 15 minutes before a player can resume.

In Leicester a survey of gambling victims at a Gamblers Anonymous meeting revealed a pattern of thousands of pounds being lost, to the individual's detriment and distress. There is widespread evidence that the current regime of high stakes has led to serious damage to individuals and their families and livelihoods, which cannot be the government's objective.

Question 2

The survey referenced in Question 1 looked at the way in which interventions required and urged on the industry with gamblers had taken place. The overwhelming conclusion was that no efforts were or are being made to intervene.

Players were asked if there had ever been an intervention by staff to advise a break after 30 minutes play. All respondents said they had never experienced an intervention. Players were asked if they had been advised to stop because of their level of losses. One said there had been one intervention in four years. The rest reported no interventions.

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The conclusion is that while mitigating interventions are available they are rarely deployed in practice.

Question 3

A key issue is the number of gaming machines which can without licensing intervention be installed in a licensed gambling establishment. At the moment it is four per premises, and FOBTs contribute around 50% of profits to betting shop profits.

The council view is that control of the licensing of FOBTs should extend to all such machines. The authority can take a view as to how many terminals can be in one establishment taking into account the communities in which they will be found and the overall numbers of shops and terminals within those communities.

Licensing should be subject to review and renewal on a regular basis, (perhaps three years). Review and renewal would require evidence that there has been proper oversight and intervention of play on such machines.

It is accepted that licensed betting establishments can provide local employment, but evidence is also that FOBTs take more out of local communities' economies than other forms of spending.¹

The current position, that the unregulated installation of FOBTs accompanied by a failure of operators to intervene in a timely or appropriate way, accompanied by the current high level of stakes, must change.

Question 4

The issues as described in Question 3 can be set out as a suggested licensing framework for FOBTs. No specific number of terminals for each licensed outlet is proposed. Instead an area and community-based approach to licensing should be within the powers of local authorities, who best know the issues, economic and social.

The authority would be able to use local risk-assessment framework policies to judge how many FOBTs might be appropriate within a community. That assessment would include whether there were nearby establishments which might attract or deal with at-risk communities (such as homeless or drug treatment hostels).

Question 5

Individuals with access to more resources often use online gambling rather than going into betting shops. FOBTs are therefore often found in betting establishments which are in areas of deprivation or with vulnerable people and/or vulnerable communities.

Perhaps most important new tool given to regulators and policy-makers has been the introduction by the Gambling Commission of a requirement for licence operators and councils to prepare and have a risk assessment of the effect of a licence on local and vulnerable communities. Leicester City Council is preparing a risk assessment strategy against which to test new applications or the performance of existing gambling licence holders.

¹ [Landman Economics: the Economic Impact of Fixed Odds Betting Terminals: 2013](#)

Question 6

A more rigorous legal approach to operators' social responsibilities might lead them to take them more seriously, especially as our evidence has been that interventions to mitigate gambling behaviour and losses do not take place.

A further concern is that too often and for too long periods staff operate alone, making it more difficult for them to implement, even if they wanted to, the interventions needed to keep people out of trouble with their gambling. CCTV records should be available for inspection by relevant authorities, including the police and licensing and oversight authorities (such as The Gambling Commission and local licensing council). However good the security and surveillance, this should not allow operators to reduce or ignore their responsibility to providing a safe working environment for their staff.

Question 7

The council has no observations as it has not been involved in any research or issues directly involving the effects of advertising.

Question 8

The council has found there is little systematic collection of data relating to people's gambling habits. However it also found that, when asked, residents were willing to provide important information about their gambling habits and the impact gambling had on their lives and the lives of their families.

It is recommended that:

- A standard framework of questions be established to be used by agencies (such as Citizens Advice) to establish gambling habits (where they gamble, form of gambling, how much is spent and the impact)
- Agencies such as mental health services, homelessness hostels and others seeking to help vulnerable individuals integrate questions about gambling into their profiling of their clients
- Signposting to help and advice about gambling problems and issues be improved from the current poor level.
- Funding for advice and advice signposting should be supported through funds from the licence fee.
- A review of what can be spent through the licence fee to support other measures helping victims of gambling should be undertaken.

In conclusion, Leicester City Council undertook a scrutiny review of the impact of gambling issues which reported in July 2016. [A link to the report can be found here \(pages 75-140\).](#)

Yours sincerely

Cllr Sue Waddington

Assistant Mayor: Jobs and Skills