



Review of Gaming Machines and Social Responsibility - Submission by the Sport and Recreation Alliance

Name:

Organisation: The Sport and Recreation Alliance

About the Sport and Recreation Alliance

The Sport and Recreation Alliance is the umbrella body for sport and recreation in the UK and represents 320 members from across the sector including organisations like The British Horseracing Authority, The Greyhound Board of Great Britain, The FA, the Rugby Football Union, British Athletics, Ramblers, British Rowing and the Exercise Movement and Dance Partnership.

The Alliance welcomes the opportunity to submit evidence to the review given that many of our members have significant commercial and broadcast arrangements in place for sporting events that carry gambling advertising. In this context, our responses are confined to questions 7 and 8 regarding the impact of existing rules on gambling advertising and the potential implications of any changes on sport.

For all respondents:

Q1. What, if any, changes in maximum stakes and/or prizes across the different categories of gaming machines support the Government's objective set out in this document? Please provide evidence to support this position.

No comment.

Q2. To what extent have industry measures on gaming machines mitigated harm or improved player protections and mitigated harm to consumers and communities? Please provide evidence to support this position.

No comment.

Q3. What other factors should Government be considering to ensure the correct balance in gaming machine regulation? Please provide evidence to support this position.

No comment.

Q4. What, if any, changes in the number and location of current gaming machine allocations support the Government's objective set out in this document? Please provide evidence to support this position.

No comment.

Q5. What has been the impact of social responsibility measures since 2013, especially on vulnerable consumers and communities with high levels of deprivation?

No comment.

Q6. Is there anything further that should be considered to improve social responsibility measures across the industry? Please provide evidence to support this position.

No comment.

Q7. Is there any evidence on whether existing rules on gambling advertising are appropriate to protect children and vulnerable people from the possible harmful impact of gambling advertising?

The [CAP and BCAP Gambling Review](#) published in 2014 confirmed that there was limited evidence of any correlation between frequent advertising of gambling (including sports betting) and rates of problem gambling and under-age participation. In particular, the review showed that while advertising of sports betting had increased since 2007, its share of total advertising across all gambling activities (including lotteries, bingo and online casino/poker) remained the smallest. Similarly, the review confirmed that, on average, children see only one sports betting advert a week.

In this context, while we recognise the importance of continually reviewing the risks and potential harms to vulnerable groups, we believe any proposals for change to the existing regime around gambling advertising must be rooted firmly in evidence.

Q8. Any other relevant issues, supported by evidence that you would like to raise as part of this review but that has not been covered by questions 1-7?

Broadcasting income generates significant income for sport, much of which is reinvested back into the grassroots in order to support the long-term development of sport. As an example, last year a number of the major sports rights holders reinvested over £127m in grassroots sport from the net revenue generated by the sale of UK broadcasting rights as part of their commitment under the [Voluntary Code on Broadcasting](#). This level of reinvestment is only made possible by a thriving and competitive market for sports rights which in turn is dependent upon broadcasters being able to exploit the value of sports content through advertising. Much of this advertising is for sports betting given the close proximity between sport and betting and, in the case of certain sports such as horseracing and greyhound racing, the advertising of betting is integral to the sport itself.

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Q8 (cont.)

In addition to reinvestment, broadcasting exposure also ensures that major sporting events are accessible to the widest possible audience. This is crucial to retaining existing fans and engaging new fans in what is a very competitive market place.

Further restrictions on the ability to advertise sports betting alongside major sports events would therefore have a detrimental effect on broadcasters' appetite for sports content and the amounts they would be willing to pay for the rights to broadcast sport. The impact would be significant for all sports but in particular those which have a very close relationship to betting and are broadcast widely, notably horseracing and greyhound racing. As an example, horseracing is the most broadcast live sport on free-to-air television, with over 100 days of live coverage planned in 2017. Lower rights fees would mean less money is available to reinvest in developing grassroots sport and, were advertising restrictions to dampen broadcasters' interest in showing sport, restrict the ability of fans to access live sport on TV and other platforms.

In addition to broadcast advertising, we would be particularly concerned if the review were to propose any changes to the status of gambling sponsorship of sport. Sponsorship by gambling companies provides a significant revenue stream for sport in addition to broadcasting rights which is similarly used to reinvest in sport and the positive benefits it brings. The sector already complies with the existing guidance on removing gambling sponsorship and company logos from children's merchandise and we believe this provides a sufficient safeguard against the risks of harm to young people.

The Government's own sports strategy, *Sporting Future*, makes clear that Government wishes to see sport maximise its commercial income, including from broadcasting and sponsorship, so as to reduce reliance on public funding. We believe that further restrictions on sports betting advertising would therefore be inconsistent with this objective and indeed would hamper many sports from commercialising their existing product.

Against this background, it is crucial that any decisions on changes to the requirements around gambling advertising – and in particular the requirements on advertising sports betting – are evidence-based and take into account the potential impacts on sport, both at elite/professional level but also at grassroots level. Clearly, any changes to the current position which exempts sports events from the pre-9pm ban on gambling advertising would have major consequences for the value of sports rights and, by extension,