

# DRAFT GAMBLING BILL VIEWS ON KEY ISSUES

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## 1. PREFACE

This document describes a number of public views expressed about the Government's proposals in the November 2003 draft Bill. A Joint Committee of the House of Commons and the House of Lords also considered the draft Bill, and published a report on 7 April 2004 and, later, 22 July 2004.

The Government considered these reports and published two responses, which are also available on the DCMS website:

[http://www.culture.gov.uk/gambling\\_and\\_racing/draftgamblingbill.htm](http://www.culture.gov.uk/gambling_and_racing/draftgamblingbill.htm)

The Government's responses sought to address a number of concerns raised during the public consultation and by the Joint Committee. The responses therefore included a number of very significant changes in policy as compared to the November 2003 draft Bill.

## 2. INTRODUCTION

This summary of responses does not attempt any quantitative analysis of the responses received. Rather, it highlights a number of key issues, which, in the view of the Department, were shared by a significant number of respondents. Nor does this analysis seek to justify policy as it was when the draft Bill was published or explain the extent to which the views expressed influenced the further development of policy.

The draft Gambling Bill was published on the same day the Government announced a public consultation, which was the 19<sup>th</sup> November 2003.

The consultation period ended on 28 February 2004. More than 200 detailed responses were received from members of the public, gambling industry representatives and operators, faith groups, charities, MPs, and local authorities.

Respondents sought assurances that the proposed Gambling Bill would include sufficient measures to protect young people and vulnerable people, including problem gamblers, from increased access to gambling. Many respondents expressed fears that the Gambling Bill could lead to a proliferation of gambling establishments across the country and that this would cause a rise in problem gambling.

Respondents identifying themselves as representatives of a faith group or expressing views based on their religious views tended to oppose any wider availability of gambling products.

Young members of the Salvation Army sent in more than 1,700 postcards, which asked the Government to think again about whether children should be permitted to play low stake and low prize gaming machines. They also asked for the minimum age for gambling to be raised to 18yrs for all types of gambling.

Only one response called for the age limit to be lowered to 16yrs.

Whilst most of industry representatives and gambling operators welcomed, in the broadest terms, the Government's modernisation proposals, a small number were concerned that there would be too many unnecessary restrictions imposed upon gambling businesses. Concern was expressed, also, that the Bill's provisions would not do enough to encourage and foster a spirit of competitiveness in, and across, the different gambling sectors.

We are grateful to the majority of respondents who have kindly agreed that we may make their responses public and they are listed in the Annex to this document. Understandably, a number of respondents have asked us not to print or post online their responses.

### 3. GAMBLING COMMISSION AND REGULATORY STRUCTURE

#### Key issues/concerns:

- Commission must champion socially responsible gambling
- Commission's role must be clearly defined
- Commission's powers should be strengthened
- What will the Codes of Practice say?
- Grandfather Rights for existing gambling operators must be secured
- 10-year operating licence creates unnecessary uncertainty

#### Powers and Functions

*'It is important that the Gambling Commission keeps under review matters of social responsibility and we think it's right for the new Gambling Commission to have the powers to remove licences from those companies that are deemed not to be behaving responsibly.'* Christopher Bell, Chief Executive, Ladbrokes Worldwide

Virtually all the respondents had something to say about the role of the proposed Gambling Commission. No one disputed the importance of a strong regulator for gambling, many respondents urged the Government to give the Commission more powers to undertake all its regulatory responsibilities.

A number of respondents called for the Commission to also regulate the National Lottery and spread betting. However, there were respondents who wanted to see how the Commission coped with its responsibilities before seeing them extended.

There was a concern, expressed, primarily, by faith groups and individuals identifying themselves as religious, that the draft Bill did not possess a strong enough requirement on gambling operators to demonstrate social responsibility and many such groups and individuals wished to see the Commission take on a more proactive role in dealing with the negative impact that gambling may have upon individuals and communities.

One of the main demands of many industry respondents was that the Commission's codes of practice should be made available for scrutiny at the earliest opportunity.

#### Operating licences and transitional arrangements

Many domestic gambling operators sought reassurance that their present rights to commercial activity would continue under the Bill and these rights would be 'in perpetuity'. Many operators were concerned that the draft Bill and supporting documentation were not sufficiently clear in this regard.

*'The Bill does not include measures reflecting the assurances given... that the existing Industry would not be endangered. In most cases the future of these businesses (whether they be seaside amusements, adult gaming centres or machines being operated in public houses) could be left to the discretion of Local Authorities which may unilaterally decide not to grant permits to*

*businesses that may have been operating for generations and there is no right of appeal.'* W E Underwood MBE Pastimes (Hornsea) Ltd

Ten-Pin bowling centre operators explained that they were uncertain whether their businesses would be granted grandfather rights and whether they would be allowed to offer low stake/low prize (Category D) gaming machines for play by under 18 year olds, Family Entertainment Centres (FECs).

Some domestic casino industry respondents stated that existing small casinos find it very difficult to compete with new larger casinos, given the cap on the number of machines and a prohibition on linking machines between casinos.

Many industry respondents, both domestic and overseas, expressed considerable concern that an operating licence which required renewal after 10 years, would create unnecessary uncertainty in investors and result in lower investment in new projects. Many respondents continued by pointing out that there was already provision in the Bill for the Gambling Commission to review and, if necessary, revoke operating licences.

#### 4. PROBLEM GAMBLING

##### Key issues/concerns:

- Moral objections to changing existing controls
- Insufficient measures to protect vulnerable adults and children from negative effects
- Too many restrictions would harm the industry
- Proliferation of casino establishments will lead to more problems
- Objection to mix of alcohol and gambling

A small number of individuals wrote stating that gambling was immoral and illustrated this with personal experiences of the negative impact that problem gambling has had on communities or individuals known to the respondents.

Many respondents expressed concern that by lifting locational restrictions on casinos and offering more consumer choice, the Bill would lead to an unchecked explosion of casinos across the country.

A number of respondents expressed a fear that the Bill might lead to an increase in problem gambling as has been seen in other jurisdictions, such as Australia, with gaming machines increasingly invading 'normal social spaces', and that the proposed restrictions would not be adequate to deal with any problems arising.

There was general agreement that the gambling industry should contribute towards the cost of treatment for problem gamblers. However, many of those commenting on this point were not satisfied that £3 million per annum would be sufficient for the Responsibility in Gambling Trust to make a difference.

*'The Salvation Army welcomes the proposal that the gambling industry should contribute towards the cost of treatment for problem gamblers. However, it is concerned that a figure of £3m is woefully inadequate given the likely upsurge in the number of gambling opportunities and the almost inevitable accompanying increase in problem gambling.'* The Salvation Army

Faith groups and religious individuals, in particular, expressed strong concerns about the mix of alcohol and gambling and asked for a clear demarcation between the areas where alcohol is served and those where gambling is allowed in mixed entertainment complexes.

*'The Salvation Army is very concerned about the mixing of gambling and alcohol. The Government rightly points out that gambling is an adult activity that requires mature brain functionality and developed cognitive reasoning. Alcohol, in virtually any quantity, reduces cognitive functionality substantially and increases the likelihood of making rash choices...[We also believe] that there should be a clear demarcation in mixed entertainment complexes between areas where alcohol is served and areas where gambling is allowed.'* The Salvation Army

Some respondents suggested that a ban on smoking and consuming food at gaming tables and gaming machines would encourage breaks in gambling.

A number of respondents expressed concerns about the propensity of those individuals who experience a problem with their gambling to continue gambling long after they can sensibly afford to. One suggestion received was that gambling clients should be provided with a monthly statement of their losses.

*'Regular gambling venue clients should be issued with a monthly statement of their expenditure. This would be practical and positive for all concerned, and would assist in many other aspects of the safeguards. Only irresponsible casino management would want to hide from their regular clients the fact that they may be spending more than they can afford to spend on gambling each month.'*  
Cllr Steven Bate

Others suggested that gambling premises, particularly casinos, should be located away from low income areas and that a statutory advocate for responsible gambling should be established in order to minimise the social costs of excessive gambling.

The issue which caused the greatest concern, is that of children's access to gambling through play low stake and low prize (Category D) gaming machines. Young members of the Salvation Army, for example, sent more than 1,700 postcards to the Secretary of State, asking the Government to think again about whether children should be permitted to play low stake and low prize gaming machines and to call for the gambling age limit to be raised to 18yrs for all types of gambling. However, a response was received which called for the gambling age limit to be lowered to 16yrs.

*'We welcome the government's statement "gambling is for adults only"<sup>ii</sup> and the offence for allowing a young person to gamble. However there can be no exceptions if this statement is true. Allowing 16 and 17 year olds to continue to use the national lottery, football pools and category 'D' gaming machines simply because they are low risk is flawed logic. It dilutes the message to young people by implying gambling is acceptable if the amount of money or risk involved is low.'* The Christian Institute

The National Children's Home stated that they would welcome any new plans for educating both children and parents to try and understand gambling and the risks involved.

*'There is clearly still a significant need for education around gambling for young people. Gambling safely involves understanding the risks and probabilities involved, seeing it as a leisure activity, which costs money rather than an investment opportunity, and knowing where to turn for help. Similarly, parents need to be helped to understand that gambling is an adult activity and to recognise the danger signs in children and young people.'* Maurice Rumbold, NCH

Arun District Council raised a concern about children's safety and the potential dangers associated with the actual environment of gambling establishments and the risks that children may face by just being there, such as abduction. As a result the Council wanted to see measures in the Bill addressing the issue of child safety within Family Entertainment Centres.

*'This Council has recently debated, with some considerable concern, the issue of child safety in amusement arcades. Amusement arcades can be a magnet for children and are, more often than not, designed to be so. Regrettably, this means that they can also be attractive to those who prey on such children.'*  
Councillor Norman Dingemans – Arun District Council.

Industry respondents tended to welcome the social protections in the draft Bill and the degree of control in those protections.

*'Ameristar believes any social impact resulting from the expansion of casinos would be effectively controlled under the structure currently contemplated by the draft Gambling Bill.'* Ameristar Casinos

However, some parts of the industry thought that some of the proposals go too far in terms of public protection, including some of the restrictions on casinos - the size of casinos, the machine entitlements, machine to table ratios and the £1000 weekly threshold for bingo in clubs and pubs.

## 5. INDUSTRY AND CONSUMER PERSPECTIVE

### Key Issues/concerns:

- The Bill won't encourage and promote fair competition
- Too many restrictions could potentially damage business
- Bill favours overseas casinos and existing domestic industry is snubbed

The gambling industry has reacted in a variety of different ways to the prospect of new Gambling laws. Many welcome the principle of changing the law, but there are some who feel the proposed Bill still contains a number of unfair restrictions. It is interpreted by some that the new regulations will be anti competitive and will favour much larger casino establishments.

### Casinos

There are 130 existing casinos, the majority of whom are represented by the British Casino Association (BCA) and the UK Casino Operators Association (UKCOA). They were supportive of the conclusions of the Gambling Review Body, which advocated a more ambitious liberalisation. They are more negative about Government policy because of what they view as anti-competitive and unnecessary restrictions on smaller casinos, which they feel will leave them unable to compete with the new larger casinos, which they believe will be dominated by overseas operators.

Many seek for clarification regarding casino sizes and the minimum floor space required to operate. The Small Business Service see the proposal to set a licence threshold of 5,000sq ft for gaming areas for new casinos as a barrier for smaller firms to enter the market.

*'...The proposal to set a licence threshold of 5000 square feet gaming area for new casinos. We view this as a barrier to entry to the market for smaller firms, and note that nearly 94% of casinos operating at March 2003 (118 of 126) were below this gaming floor area and the Gambling Review recommended a minimum threshold for future licences of only 2000 square feet.'* Peter Whittington, Small Business Service

However, opinion was divided over the proposed 'machine to gaming table' ratio of 3:1 for casinos with floor space between 5,000-10,000sq ft and unlimited numbers of machines if the gaming area is above 10,000sq ft. There was some support for this measure.

*'We believe the limitation of three slot machines to one table in casinos of between 5,000 square feet and 10,000 square feet in size is appropriate in the first instance and could be subject to review at a later stage. This proposed change will give rise to higher gaming revenues and resulting returns for "small" casinos, particularly absent the need for the added investment required for "large" casinos.'* MGM Mirage Development

A large proportion of industry members feel that a ratio of 8:1 is far more acceptable:

*'The CMMG believes that a ratio of eight machines per table, as recommended by Budd, would be logical. Given that the average table in a casino has eight playing positions, this ratio maintains a fifty-fifty balance between machine and table gaming, thus preventing casinos becoming dominated by machine gaming. In addition, we believe that this ratio, combined with the minimum size requirement of 5,000 square feet of table gaming space, will be sufficient to prevent proliferation.'* Casino Machine Manufacturers Group

Many casino establishments are also against the proposal to ban the linking of machines across different casinos as they feel it will undermine their economic viability and that there is no evidence to suggest that it would encourage proliferation.

*'We take issue with the Government's justification for banning machines linked across different casinos (Wide Area Progressives). There are no studies available, which demonstrate any association between these facilities and problem gambling, and we are not aware of any oral evidence given to the committee, which has supported or justified this prohibition on linked machines. Furthermore, the availability of linked table games demonstrates the inconsistency of these proposals as these games offer considerable jackpot prizes.'* Leisure Link

Local authorities and industry members alike were worried that too much emphasis is being placed upon resort casinos, as this will have a negative impact on seaside resorts. That said, industry members strongly support early clarification of whether the planning authority, local authorities or the regional planning bodies will determine the location of regional casinos. The British Amusement and Catering Trade Association (BACTA), would like all those involved, to adopt a cautious approach and allow a phased introduction of a limited number of resort casinos.

*'...Allow the phased introduction of a limited number of new style resort and large casinos within a controlled number of designated areas where a clear economic and social benefit is deemed likely. This compromise would allow this exciting new product to be market tested in the UK without risking the potentially disastrous social and economic consequences...'* BACTA

## **Gaming Machines**

The various proposals concerning gaming machines have caused a number of different reactions from members within the gambling industry. Some felt that the agreement regarding Fixed Odds Betting Terminals (FOBTs) gives bookmakers an unfair advantage, as there is a fear that Adult Gaming Centres (AGCs) and bingo halls, that are sited close to bookmakers, will suffer. However, the proposal to class FOBTs as gaming machines was a welcome move. There was also concern over the maximum stakes and prizes allowed for Category B gaming machines and in what type of premises they can be placed. Business in Sport and Leisure (BISL) along with bowling centres expressed worry about local authority decision-making in relation to the availability of £25 prize gaming machines in pubs and at bowling alleys.

*'The average number of machines in ten pin bowling centres is 17. They are type C & D machines and their contribution to the viability of the business is critical. The draft legislation allows new ten pin bowling centres to have only two*

*category C machines as of right. If this right is imposed on ten pin bowling centres, this would threaten the viability of the construction of future bowling centres. ' BISL*

*'I understand that the guidance to Local Authorities is likely to identify that Tenpin bowling centres are expected to have more than 2 gaming machines, however, this leaves tenpin bowling operators exposed to Local Authorities setting their own policies, irrespective of guidance, which is not an uncommon occurrence. I do not believe that any of the other categories of gaming are exposed in the same way as pubs and bowling centres are to a Local Authority policy decision.'* Frank Johnson – Namco Station

It was also feared that if the proposed maximum prize for Category D machines remained at £5, the machines would be commercially unviable and it was seen as preferable to have the prize limit set at £8 with a 30p stake. With regard to the proposed restrictions to prevent young persons having access to gaming machines, it was suggested that there should only be an age restriction on Category D machines only when there is enough evidence from research to justify such a move.

Pubs and clubs that possess gaming machines; will also be affected by the changes proposed by the Bill. Many pubs and clubs were worried that it will have a negative impact because the proposed entitlement of two gaming machines for such premises is seen as too low and it was felt that it should be four.

## **Bingo Halls**

There are nearly 700 bingo premises in operation in the UK, represented by the Bingo Association. They are supportive of the aim to modernise and ensure future flexibility, but the association has strong objections to bingo being allowed in larger casinos (although the two major operators, representing 300 clubs, support the introduction of bingo in casinos). It was felt that this might have a negative impact on the sector drawing customers away from traditional bingo halls and, in many cases, hastening the conversion of traditional bingo halls to casinos. There was also concerned about the mix of soft and hard forms of gambling in casinos and the potential loss of business for their sector.

*'The Association has stated its objection to bingo being offered in casinos in every submission it has made as part of the gambling review process. Although the two major operators, representing nearly 300 clubs, support the policy of bingo in casinos, seeing the potential to apply for casino licences (they already operate casinos and identify a potential synergy between casino gambling and bingo), the majority of the Association's members are firmly opposed to this policy. Since our previous submission, a number of reports have been published, assessing the impact of deregulation from a number of different, perspectives. Without exception they support the industry's contention that bingo players will find themselves trading up to harder gaming activities, with a resulting loss in revenue to bingo.'* The Bingo Assoc.

## Charity Lotteries

The main concern of charity lotteries was that the Bill did not deal aggressively enough with commercial prize competitions which they believe mimic their lotteries.

*'It appears that under the proposed new Gambling Bill, the Government intend to permit commercial organisations to operate pseudo-lotteries in the guise of prize draws. Participants are required to undertake a simple question and answer process with the majority getting the answer right and the winner subsequently decided by a lottery.'* Carol Campbell – Hospice of St Mary Furness

One of the issues central to the subject of charity lotteries is the debate over how prize competitions and lotteries should be defined. The media and telecommunications industry are concerned that what they see as an unclear definition of lottery could damage their prize competition revenue.

*'Nothing is said about making a clear distinction between prize competitions and gaming, which is also defined. The term is defined as playing a game of chance for a prize and a game of chance includes a game that involves both an element of chance and an element of skill. The Government recognises that most prize competitions involve not only an element of skill but also a draw or chance element to determine the winners<sup>1</sup> but there is no clear or any guidance as to whether or how gaming can be distinguished from prize competitions.'* Sarah Gregson – Celador Productions Ltd

## Bookmakers and online operators

There are currently around 8,800 betting offices whose interests are represented by the Association of British Bookmakers (ABB). ABB were generally content with the status quo, seeing the Bill as one for casinos and, as such, is likely to damage the betting industry while adding to its costs. They were particularly exercised on the subject of betting exchanges, which they believe require more intensive regulation, particularly of users. ABB also represents the major UK based operators of remote betting. Most are keen to ensure the Bill does not introduce onerous regulation.

## Betting exchanges

Betting exchanges provide an internet based betting market where registered users are able to both offer and accept bets through the intermediary of the exchange operator. The most well known betting exchanges are Betfair and Betdaq. They support the objectives of the Bill, but want to avoid over-regulation of their service and their users.

## 6. THE ROLE OF THE LOCAL AUTHORITIES AND PREMISES LICENSING

### Key issues/concerns:

- Costs incurred by local authorities
- Prevent category D gaming machines in unlicensed premises
- How the Bill will coincide with the implementation of the Licensing Act 2003.
- Casino proliferation

Local authorities will be responsible for licensing premises. Licensing Boards in Scotland already perform this function. The Local Government Association (LGA) and the Local Authority Co-ordinators of Regulatory Services (LACORS) are the main representative bodies.

On the whole, authorities welcomed their new responsibilities under the Bill, but are concerned about the additional burdens and costs and the extent to which centrally set fees will cover the costs associated with those functions.

The LGA, in particular, is opposed to a centrally set fee regime and is likely to lobby for locally set fees. The LGA believe that locally set fees can enable local and regional variations to be taken into account and thus, generate full cost recovery. In contrast, the industry would prefer centrally set fees to ensure consistency across the country.

The LGA are also anxious about the pressure being placed upon authorities to implement the Gambling Bill soon after the Licensing Act 2003. Rileys Ltd feel that the implementation of the liquor licensing combined with monitoring gambling will be too much for local authorities to handle and that the cost will be much greater.

Local authorities are in disagreement with the presumption to grant a premises licence, some preferred to have power to apply 'blanket bans'. They are also unhappy that more weight is placed on guidance from the Gambling Commission rather than local authority policies.

*'Council considerations are to be subject to Commission Codes of Practice and guidance, the licensing objectives and the LA gambling statement. The hierarchy of directions to be taken into account means that the status of the Council's own policy, developed to reflect local issues and the result of consultation with local police, residents and businesses, will be reduced to that of an after thought.'* The LGA

There are, however, a good deal of industry members that think otherwise and call for national guidelines to be set by the Gambling Commission and that local authorities should not be able to refuse the permission of gambling premises on the basis of 'need'.

*'The Gambling Bill and all DCMS policy documents make it clear that the 'Demand Criteria' for all forms of gambling will be abolished. This however, will be meaningless if local authorities use their powers under planning legislation to refuse planning permission for new premises under a heading of 'Need'. We have already seen these powers used to refuse planning permission for premises*

*with a liquor licence and the Courts have upheld by the Planning Inspectorate and these decisions. There is a real need for joined up Government to ensure that that the removal of the Demand criteria really does work in practice.'* BISL

Faith groups, anxious about casino proliferation, have called for the inclusion of a wide range of range of consultees when applying for gambling and premises licenses.

*'An overhaul of the local planning system with regard to new gambling developments is vital in conjunction with the proposed Bill. We recommend the inclusion of social agencies such as social and probation services, primary care trusts, hospitals and addiction treatment agencies and community workers as well as police forces in the list of consultees.'* Gareth Wallace - Evangelical Alliance.

Local authorities, as well as faith groups, were concerned about the potential impact the Bill may have upon communities. In particular, many authorities wanted to continue with the policy of not granting 'category D' machines permits to unlicensed premises such as fish and chip shops.

## 7. INDUSTRY WIDE ISSUES

### Key issues/concerns:

- **The effect of the advertising of gambling**
- **Gambling with credit**

Many of the issues in this section relate to the concerns faith groups and other public bodies have regarding the problems associated with prolific gambling. The possibility of more wide spread advertising provoked a strong reaction. It was felt that such proposals will be a factor contributing to a potential rise in problem gamblers across the UK. There was also the question as to who should be responsible for carrying out the regulation of advertising.

### Advertising

Gambling companies welcomed the Government's policy on advertising.

*'...Ameristar supports the Government's policy that there should be an extensive relaxation of the rules on the advertising of gambling. Ameristar also supports requirements that advertising and promotional materials include information about social impact issues...as part of our responsibility to address social impact issues.'* Ameristar

In terms of the regulation of advertising, it has been suggested by the Advertising Association (ASA) that the Gambling Commission should delegate this responsibility to the ASA. Alternatively, the ASA suggested that the Commission could 'contract out' as the Communications Act 2003 allows the Office of Communication (Ofcom) to delegate functions. They feel that either option would allow the Commission to retain licensing powers and to become a backstop regulator, plus they support the idea that the Commission could draw up advertising codes for the ASA to administer.

*'...The ASA is recognised by the OFT (Office of Fair Trading) as the "established means" for implementing the Control of Misleading Advertisements Regulations 1988 (as amended), and therefore applies its own sanctions, but it can also refer an advertiser to the OFT in the last resort. This system provides a range of deterrents and sanctions which are quick and effective, as well as backstop regulatory intervention where required. In the case of advertising for gambling products and premises, the AA would envisage the Gambling Commission rather than the OFT becoming the backstop regulator for the specific gambling provisions.'* The Advertising Assoc.

The broadcasters, notably ITV, dislike the proposal that the Commission will be able to issue codes of practice on the advertising of gambling products, as they are concerned that broadcasters will have to deal with two separate regulators. ITV feel that it is logical that the GC should have powers to revoke licenses from those who are abusing their new right to advertise gambling, but it should be the responsibility of OFCOM, via the advertising standards code, to regulate misleading advertising in this sector.

*'We...are concerned by the proposal for the Gambling Commission to issue Codes of Practice relating to the advertising of gambling products...Although there will no doubt need to be additional rules in the Codes to regulate this new*

*area of advertising, we are concerned that giving the Gambling Commission such regulatory powers will mean that broadcasters have to deal with two regulators overseeing advertising in this area.’ ITV*

## **Credit and Inducements**

Faith groups expressed strong opposition to gambling on credit. It was felt that this would encourage the growth of gambling debt and thus increase the harmful effects of regular gaming. The Royal College of Psychiatrists also support the prohibition on offering credit at casinos as well as the use of credit cards in gaming machines and lottery vending machines.

*‘The Government clearly recognises that commercial gaming, with its rapid turnover, is the most likely form of gambling to be taken to excess. It is therefore appropriate that the proposed legislation maintains the ban on credit for gaming in casinos and prohibits the use of credit cards in gaming machines.’*  
Royal College of Psychiatrists

Industry members support the use of credit, although Kerzner International did not think it should be used in slot machines.

The Citizens Advice Bureau stated that the gambling industry and any lender giving loans to people knowing that it is for the purpose of gambling, should be under an obligation not to exploit such individuals by continuing to permit gambling or extending further credit.

*‘I believe that the current position (i.e. debt not enforceable) should also be extended to more clearly include lenders. It would to some extent protect people with compulsive behaviour and people close to them from being exploited and force the gambling industry and lenders to be more responsible.’*  
David Still – Citizens’ Advice Bureau (CAB)

## **ANNEX A**

### **LIST OF RESPONSES**

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Acorns Children's Hospice  
Advertising Standards Authority  
Alderney Gambling Control Commission  
Ameristar Casinos  
AMF Bowling Centres  
AMF Strykers  
Arlington Leisure Ltd  
Arun District Council  
Association of British Bookmakers  
BackAndLay.com Ltd  
Beach Amusements - Stonehaven  
Bells Stores  
Bighearted Scotland Charitable Trust  
Blackheath Leisure (Carosel) Ltd  
Bowlplex Plc  
British Beer & Pub Association  
British Casino Association  
Business in Sport & Leisure Ltd  
C. A. Heal & Sons (Amusements) Ltd  
Camelot Foundation  
Camelot Group plc  
Carlton Clubs  
Carr Royd Parks Ltd  
Carrick House  
Casino Machine Manufacturers Group  
Casino Operators Association of the UK  
Castle Leisure  
Celador Productions Ltd  
Chairman Planning & Development Committee  
Cherwell District Council  
CIBC World Markets  
Cllr M Hancock  
Clements (Portrush) Ltd  
Connaught Leisure Ltd  
Curley's Supermarkets  
Customs & Excise Division – Isle of Man  
Denbighshire County Council  
Eden Project  
Elfyn Llwyd MP  
Environmental Health- London Borough of Newham  
GamCare  
Harpers Leisure International Ltd  
HB Leisure Ltd

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HJM Caterers Ltd  
Holloway Chambers  
Hospice of St Mary of Furness  
IGGBA Interactive, Gaming, Gambling and Betting As  
Institute of Sales Promotion Ltd  
JSP Leisure Ltd  
Justices' Clerks' Society  
K.W. Reader & Sons  
Kent Police  
Kerzner International  
Kossway Automatics Ltd  
Ladbroke's Worldwide  
Latgreen Ltd  
Leisure Link  
Leisure Promotions Ltd  
Linland Ltd (Amusements)  
Liskeard Leisure  
London Borough of Barking & Dagenham  
London Borough of Tower Hamlets  
London Clubs International  
London First Centre  
LOROS Lotteries Ltd  
Lothian and Borders Police  
Mac Automatics Ltd  
Methodist District Centre  
MGM Mirage Development  
Mid Beds District Council  
Midland Coin Machines Ltd  
Mobile Broadband Group  
Morning Noon & Night Ltd  
Mount St Joseph Convent  
Namco Station  
National Leisure Ltd  
National Children's Home  
News International Ltd  
Northwest Development Agency  
Novamedia  
Oulton Broad Leisure Ltd  
Oxford City Council  
Paddy Power plc (Bookmakers)  
Pastimes (Hornsea) Ltd (Amusements)  
PPA (Periodical Publishers Assoc.)  
Punch Taverns plc  
QAAD (Quaker Action on Alcohol and Drugs)  
Quattroleisure

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Rangers Lotteries Ltd  
Rank Group Gaming Division Ltd  
Rileys Ltd  
Saint Kentigern Hospice  
Sandown Pier Leisure Ltd  
Savoy Enterprises Ltd  
Seven L. Ltd  
Shaw's Amusements  
St Barnabas Promotions Ltd  
St David's Promotions Ltd  
St Giles Hospice (Promotions) Ltd  
St John's Hospice in Wirral  
Sir William Utting  
Sutton Citizens Advice Bureau  
Technical Systems Testing North America Inc.  
Tenpin Bowling Proprietors Association UK  
The Advertising Association  
The Association of Licensed Multiple Retailers  
The Bingo Association  
The British Horseracing Board  
The Christian Institute  
The Everton Football Company Ltd  
The Institute of Licensing  
The Jockey Club  
The Law Society of Scotland  
The Lotteries Council  
The Newspaper Society  
The Salvation Army Campaign  
The Salvation Army Response  
The Shropshire & Mid Wales Hospice  
Thomas's Entertainments Ltd  
TLC Lottery  
TM Retail  
Tuckwell CHASE Lottery Ltd  
ViRSA Manager (Rural Shops Alliance)  
W. & T. L. Ball & Sons (Amusement Caterers)  
Warwickshire County Cricket Supporters Association  
Weststar Holiday Parks  
Whitehouse Leisure Ltd  
Wight City Leisure PLC  
Windmill Leisure Centre  
Winners Amusements Ltd  
World Bet Exchange