General Election 2015
A throw of the dice
Public policy issues facing the gambling sector
# Contents

Public policy issues facing the gambling sector

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Introduction

The start of the 2015 General Election campaign brings into sharp focus the range of policy challenges facing the UK gambling industry.

From concerns regarding FOBTs (Fixed Odds Betting Terminal) and the prevalence of betting shops on the High Street to potentially greater demands from the Treasury for tax revenue, gambling faces an uneasy array of issues with Government and regulators. That the parochial interests of the industry are set against a macro-political backdrop of greater complexity (in particular, the decline of the two-party system and advancing devolution) only serves to deepen the intrigue. Regardless of how the nation votes on 7 May, we are left with the strong impression that the key to gambling’s future lies in more effective political and regulatory engagement.

Hopes for a stable political consensus in relation to gambling after the Budd report and the Gambling Act 2005 vanished long ago. Instead, each year brings greater scrutiny and heightened uncertainty, often followed by changes to regulation or taxation (although this is not always to the detriment of the industry).

The reactive and piecemeal nature of Government intervention owes much to the fact that gambling sits in the crosshairs of two essentially political forces.

First, there remains the urgent need for Government to raise revenue, reduce the deficit and fund better public services. The commercial success of the industry combined with its failure to project a more valued public image makes it vulnerable to upward pressure on taxes and duties: it is perceived to be able to withstand higher taxes; and tax raids on the house attract little in the way of public sympathy.

On the agenda

Parliamentary interest* in gambling 2013 to 2015

The industry’s image problem has also led to it being branded – at least by some - as exploitative of vulnerable consumers and the “wrong sort of capitalism”. This in turn creates pressure for greater regulatory and legislative intervention, to curtail the activities of operators. In the event, that intervention often does not achieve the intended societal benefits (and indeed sometimes has negative unintended consequences) but invariably creates additional costs for the industry.
The 2015 General Election marks a watershed moment. While there are several generic issues which will face the gambling industry whoever forms the next Government, as is clear from the manifestos of the major political parties (see page 13), there will be significant differences of approach depending on who is elected.

In addition to what happens to the balance of power in the next Parliament, there will be some significant changes in key personnel in political, regulatory and business spheres in relation to the gambling sector. This changing of the guard presents new challenges and new opportunities.

In this note, we have attempted to peer through the looking glass in order to perceive the prospects for the industry – both in terms of the major issues that are likely to form that dramatic narrative and the principal actors who will play out the key roles.

The outcome of the General Election will set the context for the development and determination of the issues facing the gambling sector in the next few years and the commercial prospects for the sector generally. But the possibilities for the outcome of the Election are not binary, all manner of results are possible both in terms of the political composition of any ruling coalition and also (of particular importance to the sector) the specific MPs in Parliament (who may be inherently friendly or hostile).

In order to navigate the potentially choppy political waters that lie ahead, the gambling industry would do well to take collective stock in the aftermath of the election. There will be relationships to be built, knowledge and understanding to be engendered and issues and problems to be re-framed and addressed afresh. Greater unity of purpose (based on recognition of the considerable shared interest between sectors) should lie at the heart of this too. In this way, gambling may use the next Parliament to regain a level of control over the regulatory and fiscal forces that have such a profound effect on its destiny.

Olswang LLP | Regulus Partners

April 2015
Shuffling the Pack
All change in the personnel who have led the public policy debate on gambling?

Whatever the outcome of the election, we know that in one respect at least, the parliamentary complexion of gambling issues will be altered significantly by 8th May. This election will bring about significant changes amongst those who have used the House of Commons as a chamber for debating and shaping the nation’s gambling policy – an event which brings opportunity and challenge for the industry.

First, there are those MPs who will be leaving the Commons under their own steam. Neither Dame Tessa Jowell MP nor the Rt. Hon. Gordon Brown MP – both of whom have played major roles in the development of gambling in Britain - will be contesting their seats next month. In popular lore, they have come to represent two opposing poles of Labour views on gambling – Jowell the steward of the liberalising Gambling Act 2005; and Brown the assassin of the so-called ‘super casino’. In reality, Brown’s role was somewhat different. He voted in favour of the regional casino (to give it its proper title) and only delivered the coup de grace once it had been mortally wounded in the Lords. Indeed, it was as Chancellor of the Exchequer rather than Prime Minister that he made his most profound contribution to the industry - moving betting duty from a turnover basis to a gross profits basis, providing a shot in the arm for sports betting but also ushering in the era of the FOBT.

As with Jowell and Brown, neither Gerry Sutcliffe MP (Labour, Bradford South) nor the Rt. Hon. Don Foster (Liberal Democrat, Bath) will be standing for re-election this year. Between them, these two parliamentarians have notched up more than 43 years of service for their constituents. Both have taken significant personal and professional interest in the development of gambling in Great Britain – Sutcliffe as minister and then shadow minister with responsibility for gambling and Foster as the architect of Liberal Democrat policy on the sector.

While both have been publicly quiet on gambling of late (with Sutcliffe passing on the brief to Clive Efford MP and Foster serving as his party’s Deputy Chief Whip) they have wielded significant influence on policy in this area within their respective parties.

Who will make it past the post?
In addition to those who have chosen not to contest the 2015 election, there are a number of influential ‘gambling MPs’ who may not make it past the post on 7th May.

Most high profile of these is Helen Grant MP (Conservative), the current minister for gambling and Member for Maidstone and the Weald. UKIP took control of Maidstone Council in last year’s local elections and the party is targeting the seat in May. Meanwhile, her counterpart on the Opposition benches, Clive Efford MP will be defending a slim majority in Eltham as will the Liberal Democrat’s spokesman on gambling, John Leech MP in Manchester Withington. Lastly, David Lammy MP (Labour, Tottenham), a long-term critic of the betting shop sector may also depart the House having decided to throw his hat into the ring for the 2016 London mayoral elections.
Notwithstanding election night ins and outs, it seems likely that there will be further change at DCMS. The Rt Hon. Sajid Javid MP, Secretary of State for Culture, Media and Sport will be safe enough in his Bromsgrove seat but with his star in the ascendant a return to HM Treasury beckons, should the Conservatives remain in power. Meanwhile, there is no guarantee that either Helen Grant or Clive Efford will retain their briefs should they make it through election night.

These changes will take place against a backdrop of wider change within the sphere of gambling regulation. In September, Jenny Williams will step down as chief executive of the Gambling Commission (after more than 11 years at the helm of the industry regulator) with her successor to be announced after the election; in late March, three new commissioners were appointed to the Gambling Commission’s Board of Commissioners; we have already seen this year complete overhauls of the policy teams dealing with gambling regulation (at DCMS) and gambling taxes (at HM Treasury); and within the last year Ladbrokes, Paddy Power, Rank and William Hill have all installed new chief executives.

A further significant change of personnel would occur if the Government were to follow through on its proposals to abolish the Levy and replace it with a form of bespoke betting right for horseracing. This would entail the abolition of the Levy Board and the Bookmakers’ Committee with in all likelihood the establishment of a new tribunal to arbitrate over disputes between betting and racing concerning the new right.

Some in the industry will justifiably lament the need to start again with ministers, MPs and policy teams. Gambling is an area where companies often start on the back foot and only progress once they have been unable to debunk the misperceptions of its colourful mythology. However, the change that is coming may also represent the industry’s best chance to break out of the impasse of uncertainty and stuttering change that has characterised gambling policy in the decade since the Gambling Act.

The gambling industry should welcome the new parliamentary guard with open arms and seek to form a more constructive relationship than that which it has enjoyed in recent years.

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**Members of Parliament**

Relevant Members of the last Parliament who will or might not be part of the next Parliament

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<tr>
<th>Not in the running</th>
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<tr>
<td>Dame Tessa Jowell MP</td>
<td>Helen Grant MP</td>
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<tr>
<td>Gordon Brown MP</td>
<td>Clive Efford MP</td>
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<tr>
<td>Gerry Sutcliffe MP</td>
<td>John Leech MP</td>
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<tr>
<td>Don Foster MP</td>
<td>David Lammy MP</td>
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The design of the Gambling Act 2005 was intended to facilitate agile recalibration of our gambling laws in order that they might respond effectively to changes in technology and developing consumer protection concerns.

A review of the long list of unresolved political issues concerning gambling suggests that the Act has not quite managed this. Indeed, at present, almost all parts of the industry are affected by some form of controversy or disquiet.

Setting the stakes

The sustained political and media antipathy towards B2/ B3 gaming machines in bookmakers (popularly though anachronistically still known as 'FOBTs') has ramifications that go far beyond the betting shop sector. There is a sense in some quarters that FOBTs are now too big to be banned. Legislators may well prefer that the machines didn’t exist but for a number of valid reasons have not yet been prepared to introduce major restrictions on them.

At the same time, the FOBT controversy has cast a long shadow over regulatory thinking, creating a fear of unintended consequences. Increasingly, product or licensing innovations are assessed not simply for what they are but also for what they might become.
A strong hand

While dealing with the FOBTs and a range of other clear and present issues, the Gambling Commission is also having to grapple with a vastly expanded portfolio, having taken on regulatory oversight for all remote gambling to British consumers (rather than just those operators based in Britain); as well as inheriting responsibility for the National Lottery during the most contested period in its 20-year history.

The outcome of the election is likely to have different impacts on different areas of policy. Where parties have chosen to address such issues in their manifestos (the betting shop sector enjoys the dubious distinction of having FOBTs included in the documents of four major parties), the likely implications are reasonably clear. In other areas, the industry will have to read between the lines of broader party dogma to assess their prospects.

Gambling in the 21st Century has so far been a highly politicised area (though this has not always been sufficiently recognised by the industry). It is likely to remain so after the General Election, regardless of the outcome. Yet for individual sectors and individual issues, the electoral permutations for gambling are both complex and significant.

Health issues

In respect of problem gambling, there has recently been a notable and important shift in expert opinion that problem gambling should be a matter for health experts (the fifth edition of the American Psychiatric Associations Diagnostic and Statistical Manual classifies it as a problem akin to substance abuse).

Many of those involved in treatment and counselling for problem gambling believe that the NHS should be mandated (and so better equipped) to deal with the issue rather than leaving it to the patchwork quilt of charitable organisations, privately-funded experts and more generalist debt advice organisations which characterises the present network of support. Indeed, these thoughts have started to make themselves heard in Parliament. It is not hard to see how such a shift could give rise to demands for an even greater financial contribution from the gambling sector to the public purse and with much greater scrutiny.

Over recent years, the Fixed Odds Betting Terminal (or B2/B3 machine as it is under the Act) has become the object of disquiet in political and media circles – emblematic of concerns over the expansion and increased visibility of gambling. The political rhetoric may be largely concerned with allegations that these machines are dangerous (in terms of community impact and problem gambling) but the reason why the backlash against the bookies has been so strong and well-sustained goes much deeper.

Political permutations: Labour is believed to be keen on the idea of moving problem gambling to the NHS (the shadow health minister, Luciana Berger has recently been probing in Parliament on just this point). It seems likely that the provision of help for problem gambling (and funding thereof) is an issue that will grow in the next Parliament – regardless of the electoral outcome.
In changing the economics of the betting shop (they now contribute more than 50% of revenue), the machines have roused a broad coalition of affected parties against the betting industry. The ‘traditional’ anti-gambling lobby has been joined by local authorities (led by bookie-rich Newham), other sectors of the gambling industry (disturbed by a mixture of jealousy and affronted logic) and even betting shop workers (unhappy at single-staffing and the change in the nature of the betting shop).

Given the broad nature of the opposition and its concerns, the Government’s approach of seeking evidence of harm in the £100 maximum stake appears unlikely to be the means of resolving the issues and quietening the concerns.

**Levy**

The Chancellor of the Exchequer’s announcement that the old horse racing levy system would indeed be replaced by a betting right for horseracing has deepened the betting sector’s sense of persecution.

While the interminable and painful wrangles over the obsolescent Levy meant that reform was odds-on, the nature of the proposed solution risks distorting the balance of power between those who provide horseracing and those who monetise it. The fact that horseracing now appears to hold all the cards is clearly not good news for the bookmakers; yet it may be that racing eventually pays the bigger price for the disenfranchisement of a critical commercial partner. The proposals also do not address the potential EU law and VAT issues arising from the creation of a ‘racing right’.

**Lotteries**

The reputation of state lotteries as licences to print money stems in large part from a government’s ability to suppress competition. Yet in recent years, National Lottery operator, Camelot has felt cause to lament the absence of strong-arm protection from Westminster.

The recent report of the Culture, Media and Sport select committee rejected the claim that ‘umbrella’ lotteries (such as the Health Lottery) caused a competitive distortion for the National Lottery. However, Camelot will have been encouraged by the committee’s recommendations for new rules to cover umbrella lotteries and to tackle the practice of fixed-odds betting on the National Lottery via online bookmakers.

While the select committee’s report will provide Camelot with some moral comfort there is no guarantee of practical support. In the past, governments have found it all too easy to turn a blind eye to select committees on gambling.

**As seen on TV**

Given that there was virtually no TV advertising for gambling

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Political permutations: The Government has pledged to pronounce on whether the industry’s proposals for better self-regulation pass muster. A Cabinet memo from Danny Alexander to Sajid Javid leaked in January suggests that the Liberal Democrats are keen to see action in this area. By contrast a Labour Government may see tough restrictions on such advertising as a convenient vehicle to be seen to be pushing back actively against the gambling industry.
prior to 2007, the decision to end the prohibition was always going to give rise to controversy. However, there seems to be a gathering political consensus that there is simply too much gambling advertising these days – with its prevalence before the 9pm watershed (for bingo and sports-betting) attracting particular criticism.

The gambling industry may have been slow to respond but they have at least attempted to address concerns – with both the cross-industry IGRG and the ABB’s Senet Group tightening codes of practice. It may be that these moves will be sufficient to stave off regulatory intervention for the time being. Whether they will manage to neutralise the issue entirely remains to be seen.

Social gaming

The Gambling Commission has stated that, while it continues to monitor the social gaming sector, it sees no need to intervene at present. Critics of this policy argue that certain forms of social gaming (e.g. poker, casino, slots) are so near ‘real-money’ online gambling as to warrant the same treatment; while others fear that the games may be ‘grooming’ future generations of problem gamblers.

The prospect of increased regulatory oversight for social games may seem distant right now – particularly when there are so many other issues to fix. However, while the matter may be dormant, it is far from dead – and we know well how swiftly such matters can move from simmering to boiling point. This issue may also reach the UK’s shores from jurisdictions where social gaming is perceived as a more pressing threat.

Bingo!

The attractiveness of the licensing regime for bingo has not always been appreciated by the sector itself but outsiders are increasingly seeing the potential. To the consternation of the Gambling Commission, and rather against the Act’s spirit of ‘primary purpose’ bingo licences are finding increasing favour away from traditional bingo clubs.

If the repurposing of bingo licensing to suit the needs of arcade operators (more than 150 AGCs have now been
re-licensed as bingo premises) induced nervousness, the decision by the pub company, Greene King to apply for a bingo operator’s licence (and the First Tier Tribunal’s decision that the Gambling Commission’s refusal of that application was unlawful) has lit the blue-touch paper on this issue.

The Gambling Commission is concerned that the siting of large numbers of jackpot machines in venues not designed for gambling may lead to harm as pub customers fall into gambling on them. In more vivid terms, the political consequences of Britain developing Australian-style ‘pokies in the pub’ (or even the possibility that they might) would make the current FOBT debate seem like a garden party.

The Commission has made clear its determination to stop Greene King – even if its appeal to the Upper Tribunal fails. For the established bingo clubs industry, the challenge will be to make sure that it does not get caught in the cross-fire.

A broader issue here is how ‘innovation’ (much of it inevitably rubbing up against the confines of existing regulation) is originated, packaged and perceived: more blatant attempts by operators to go against the spirit of the gambling laws may sharpen the appetite for stricter regimes; more inclusive and sensitive approaches could encourage the flexibility that the original authors of the Gambling Act had in mind.

**No Casino advantage**

There is some irony in the fact that the most high profile feature of the Gambling Act has so far resulted in so little. Back in 2005, the Act seemed to presage the arrival in Britain of *the destination casino model* – something which the architects of the legislation believed would harness gambling to a higher economic

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**Political permutations:**

While informed politicians of all hues will privately admit that the antipathy towards casino reform in the last decade was misplaced, there is little appetite among any of the parties to revive Budd’s more ambitious vision for the sector, with memories of the Daily Mail’s savaging still vivid. The push to greater localism (local authorities often have a far more positive view on casinos than national governments) could be the industry’s best opportunity.

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**Casino licensing since the Gambling Act 2005**

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<th>Large</th>
<th>Small</th>
<th>Regional</th>
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<tr>
<td>Operating</td>
<td>Awarding but not yet operating</td>
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<td>50</td>
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<td>Small</td>
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<td>Regional</td>
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end (through the provision of hotels, restaurants and other leisure amenities). A decade later, the great experiment in destination gambling has yet to be conducted – while Britain’s traditional casino operators have been left frustrated by the failure to maintain the pace of regulatory modernisation which the Act had started (following the extensive new freedoms of 2005 and 2007).

The opening of Genting’s £200m Resorts World at the NEC later this year may help to restart the debate about the future for casinos in Britain. If it proves to be a commercial and PR success, people may start to remember that the super-casino (that is the 1,250 slot regional casino provided for in the Act) isn’t dead after all but only sleeping - with a relatively simple statutory instrument required to revive it. In the meantime, more general reforms for casinos (more slots, greater freedoms to target new towns) are likely to be slow and piecemeal.

**EU**

The EU’s fourth directive on **anti-money laundering** (or 4AMLD) has caused considerable consternation in certain quarters of the gambling industry. Remote gambling operators in particular are worried that the directive will impose a commercially onerous burden that outweighs the risks associated with the sector.

Member states are allowed some discretion in terms of the directive’s implementation but whether the British government – of whatever persuasion - will make a stand for gambling is open to question. In this case, UKIP may be the industry’s greatest champions.

For some years now, the gambling industry has been dazzled by the promise of “**Big Data**”. A brave new world has opened up where predictive analytics will drive revenue growth through more influential marketing and better product design; while margins will expand as targeting improves efficiency. A small number of companies are already starting to realise some of this promise; but almost all major gambling firms are hungrily collecting and storing customer data for future use.

The price for the industry’s data passion has so far been measured in systems infrastructure investment; but the imminent prospect of the long promised EU Data Protection Regulation is likely to add in new costs in terms both of compliance and of penance (with fines capped at €100m or 5% of a company’s global turnover).

Assuming that the directive is adopted as planned in May 2015, it could take effect as early as 2017, further increasing regulatory burdens and risks.
Death and taxes, so the saying goes, are life’s twin certainties. Yet, in gambling tax has perhaps been the great uncertainty of the last decade – a period when the government has more often than not chosen to tinker with rates and structures of duty. Worryingly for the industry, the post-election outlook is for more of the same.

Over the course of the last decade, there have been no fewer than ten structural reforms of different gambling duties in Britain – the majority of them growing the Exchequer’s share of consumer expenditure on gambling.

With a budget deficit to be fixed, there is a good chance that HM Treasury will move into revenue raising mode early in the next parliament. For now, the major levers (VAT, National Insurance and income tax) out of bounds so other solutions will be sought. In this type of environment, soft targets often pay the price – and gambling seems both endemically and topically a soft target. Labour, under Ed Balls’s mantra of “revenue-raising, principled reforms”, has already put tobacco in its cross-hairs and some in the party would have gambling join it.

There can be no doubt that gambling is vulnerable. The expansion (and enhanced visibility) of gambling occasioned by both the Gambling Act 2005 and advances in internet and mobile communications is now starting to bite, with a Westminster backlash against machines in betting shops and (to a lesser extent) the preponderance of brash TV advertising for remote operators. As we have seen in the past (notably with the casino gaming duty rise of 2007 and this year’s duty increase on FOBTs) poor public perception of gambling makes operators vulnerable to tax increases.

Added to this, there is a growing appreciation in government of both the level of harm associated with problem gambling and the inadequacy of the resources (almost all funded by voluntary industry contributions) provided to meet it. The migration of views on problem gambling from an issue of moral degeneracy to a matter of mental health may ultimately lead to an NHS mandate to deal with the issue – an idea that Labour is rumoured to be keen on. Tax hypothecation is no longer the anathema it was once considered within HM Treasury and the notion that gambling taxes might be increased to fund the NHS no longer seems far-fetched.

The headline rates of Britain’s gambling taxes are relatively low by international standards -
only slot machines and London casinos suffer a rate of taxation significantly ahead of VAT on general retail (and for all manner of reasons, gambling will never be treated as general retail)

We perceive two key threats to gambling taxes in the next Parliament, regardless of who is in Number 11:

1. An increase in the ‘default’ rate of gambling duties from 15% to 20% - a move that would have a profound impact on remote gambling, and betting shops and casinos.

2. A harmonisation of machine games duty at 25% for category B machines (currently only the rate for B2 machines). This would raise an additional £22m annually for Exchequer (or £7m if the increase was restricted to category B1 machines).

From time to time the industry has assumed that it is too big or too important to be failed by government – a fallacy that derives from a misplaced sense of economic importance. True, there are more than 100,000 people directly employed in the industry in Britain. Yes, HM Revenue & Customs will rake in around £2.5bn this year in gambling taxes (excluding the National Lottery and slot machines in pubs). Yet, while, HM government may be a significant shareholder in gambling, the industry is of only marginal importance to the economy.

As Professor David Forrest writes in his ‘An Economic and Social Review of Gambling in Great Britain’:

“Neither the contribution of gambling to GDP nor its contribution to aggregate employment should be counted as a societal economic benefit. This is because there is no convincing case for believing that the industry creates additional output and additional employment.”

Professor Forrest goes on to advise that the industry would do better to emphasise consumer surplus in terms of well-being and enjoyment (where contrary to popular mythology, gambling produces a healthy surplus). The raising up of bingo (which enjoys positive perceptions) and the casting down of FOBTs (which do not) in the 2014 Budget suggest that Professor Forrest may be on to something here.

The Pay-off

Total HMRC betting and gaming receipts

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profits from UK customers and incurs material irrecoverable input VAT, may suffer a greater (pre-corporation tax) tax burden than an EU-based retailer paying output VAT at the applicable standard rate (which can recover all, or nearly all, of its input VAT).
As expected, the gambling industry is not dealt with in any detail in any of the party manifestos. However, all of the main parties have something to say and that gambling appears at all (and in many cases what is said), reflects the challenging political context for the industry.

Labour takes perhaps the most stringent line proposing to allow “communities” (by which we assume they mean local authorities) to review betting shop licences and in respect of “existing betting shops” to “reduce the number of fixed-odds betting terminals” or alternatively “ban them entirely”. Allowing such micro management of the operations of existing betting shops by local authorities would represent a major potential encroachment.

The Liberal Democrats take a similar approach although in respect of FOBTs, the powers for local authorities are said to be limited simply to reducing the maximum stake. UKIP

**Liberal Democrats**

“We will protect high streets and consumers by granting new powers to Local Authorities to reduce the proliferation of betting shops and substantially reducing the maximum stakes for Fixed Odds Betting Terminals”  
(page 50)

“These savings include: abolishing government departments when their essential powers and functions can be merged into other departments. Such departments will include the Department for Energy and Climate Change, the Department for International Development, and the Department for Culture, Media and Sport.”  
(page 9)

“We will update licensing laws in response to calls from local authorities to limit the maximum stake on fixed-odds betting terminals from £100 down to £2, to tackle problem gambling and anti-social behaviour.”  
(page 55)

**Green Party**

“Put planning back in the hands of local government by... giving local authorities planning powers to support local shops and businesses through planning policies including business conservation areas, ensuring basic shops are available within walking distance in all urban areas, restricting the number of payday lenders and restricting the power of supermarkets”  
(page 16)

“On other animal protection issues we would: End the use of the whip in horse racing and conduct a full review of the sport”  
(page 60)
also proposes to allow local authorities to limit the maximum stake on FOBTs “down to £2” and also suggests (somewhat more vaguely) that local authorities be able to use licensing laws “to tackle problem gambling and anti-social behaviour”.

The SNP calls for devolved powers to “control the growth and impact” of FOBTs, which may include maximum stake reduction.

The Conservatives take a more reserved approach, promising no new provisions and simply noting that they “have already introduced tougher regulation of gambling”.

Finally, the Green Party proposes vaguely to put “planning back in the hands of local government” which would doubtless include increased provision for regulating betting shops and other gambling venues.

Conservatives

“We have always believed that churches, faith groups and other voluntary groups play an important and longstanding role in this country’s social fabric, running foodbanks, helping the homeless, and tackling debt and addictions, such as alcoholism and gambling. We have already introduced tougher regulation of gambling, with enhanced player protections and planning controls to prevent the further proliferation of high street betting shops; we’ve capped payday lending and backed financial inclusion; and will continue to support action that helps vulnerable people get the assistance they need.”

(page 46)

Labour

“We will give local communities more power to shape their high streets, and so preserve their local identities. Councils will be given the power to require particular types of shops to apply for planning permission, allowing them to restrict the number of payday lenders or other shops that are clustering on a single high street. Communities will be able to review betting shop licenses in their area and reduce the number of fixed-odds betting terminals in existing betting shops – or ban them entirely – in response to local concerns.”

(page 65)

Labour will “give new powers for communities to shape their high streets, including power over payday lenders and the number of fixed-odds betting terminals”

(page 69)

SNP

“New powers to protect our communities There is no doubt that Fixed Odds Betting Terminals cause harm and hardship in communities across Scotland. That’s why the Scottish Government needs legislative powers to control the growth and impact of these machines, and we believe the UK government should devolve these powers in full. The problem of Fixed Odds Betting Terminals is linked to the proliferation of betting shops in some communities and so we will continue to argue for Scotland to have full responsibility for the regulation of gambling.”

(page 60)
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About Olswang LLP

Olswang is a full service law firm with headquarters in London and offices in Belgium, France, German, Spain and Singapore.

Olswang’s Gambling Group comprises lawyers drawn from our Commercial & Regulatory, Corporate, Tax, Litigation, EU and Competition and Intellectual Property practices. A full service legal offering combined with our industry expertise ensures that our gambling industry clients (and clients from other industries who are involved with gambling products and services) receive comprehensive and consistent advice in all areas. Furthermore, our expertise in other areas which are relevant to gambling businesses, such as technology, social media, e-commerce, broadcasting, ISPs, advertising, sponsorship and data protection, enables us to provide added value to any deal in which our clients participate.

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