Budd Revisited - Gambling in Great Britain 15 Years On

Dan Waugh

Introduction

In 2000, Sir Alan Budd, the noted economist was asked by the British Government to chair a review of the nation's gambling laws. The resulting 'The Report of the Gambling Review Body' (referred to here as 'The Budd Report' or 'Budd') was published a year later and provided a blueprint for how gaming and betting would subsequently be regulated under a major new piece of legislation - the Gambling Act 2005 (the '2005 Act' or the 'Gambling Act').

The work of the Gambling Review Body (the 'Review Body') was undertaken at considerable expense and effort – more than 200 submissions were evaluated, 20 evidence gathering sessions were held, a number of overseas jurisdictions were visited. In the end, a 201-page report was produced. The Review Body's 176 recommendations for how gambling ought to be regulated were based upon a set of explicitly stated policy objectives designed to further the interests of the British consumer - balancing extended choice with enhanced protections.

It was the last time that gambling was subjected to such intense scrutiny in Great Britain; the last time that such a wide variety of regulatory options were weighed with such consideration. It is to be lamented that in the 15 years since the publication of the Budd Report – a period of profound change in the British gambling market – there has been no systematic attempt to assess whether the ambitions of the Review Body have been achieved.

The aim of this essay is to do precisely that – to examine how gambling in Great Britain has developed through the prism of Budd's aspirations. There are two key challenges to this task. First, neither the Review Body nor the British Government set out a clear framework for measuring policy effectiveness (in terms of maximizing benefits and minimizing costs). Second, there are significant gaps in data publicly available to researchers – particularly in the period prior to full implementation of the Gambling Act. Where information is unavailable, certain assumptions and estimates are required to assess effects.

While the reforms recommended by Budd have had largely positive effects, there have been two major drawbacks to post-Budd gambling policy in Britain that may offer lessons for the future. First, the failure to create an evaluation framework and review process seems likely over time to result in the detachment of policy from objectives. Second, in licensing new forms of gambling, it is critical to consider the impact on the existing industry. Restraining gambling venues within anachronistic licensing constructs while at the same time unshackling remote gambling can create regulatory imbalance – and the consequences of this may not be uniformly positive.

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Origins

The decision to appoint the Gambling Review Body was, in the words of the man who chaired it: "*A classic example of Britain's approach to policy-making in those days. The Government would ask a group of generally middle-class men and women to consider issues with which they had little expertise or interest.*"

Yet if the manner of the appointment of the Review Body was characteristically British, its catalyst was all too familiar. Britain's gambling laws had fallen out of step with technological capabilities, consumer tastes and societal attitudes. It would have been possible for the Government to have addressed the internet challenge discretely; but it determined to use the opportunity to fix broader anachronisms.

The Budd Report was not the piece of naked market liberalism of popular myth. It was at heart a balanced assessment, proposing new commercial freedoms in certain areas but greater restrictions in others. Nor was it an attempt to engineer economic expansion through gambling. As Sir Alan Budd said in 2016: *"We had no interest in the profitability of gambling companies or in employment levels within the gambling industry while taxation was a subject that was only at the periphery of our scope."*

The Budd Report's primary focus was the consumer. It envisaged a gambling market that was simpler to regulate, more transparent and one which provided greater choice for adults. These aims would be allied to a system of checks and balances to keep gambling honest and crime-free; and to prevent exploitation of children and "vulnerable persons".

It considered the country's economic welfare – but this was a secondary concern. While political motives later led to the cloaking of deregulatory measures for casinos in economic motives, this owed little to Budd.

Consumer surplus - extending choice

"Our proposals generally increase the gambling opportunities for adults."[1]

The consumer sat squarely at the heart of the Budd Report. At the time the review took place, gambling in Britain (predominantly venues rather than remote) was subject to a number of restrictions on supply and consumption, which by the standards of the time as well as international comparisons appeared outdated.

Gambling venues were only permitted where existing supply was insufficient to meet unstimulated demand. This 'demand test' was a throwback to the notion that while gambling might be accommodated, it was not to be encouraged. Only 53 towns and cities across England, Scotland and Wales were permitted to license casinos – a restriction that dated back to the Gaming Clubs Regulations 1971 (and was based upon population sizes at that time). New customers at bingo clubs and casinos were required to register as members at least 24 hours in advance of being admitted for play (although this could be circumvented by way of guest rights if accompanied by a registered member). Budd considered these restrictions outdated and inimical to the interests of the consumer – and sought to eradicate them (often in the face of opposition from industry incumbents). Budd recommended that alcoholic drinks be permitted on casino gaming floors, that casinos be able to provide non-gaming entertainment; and called for the partial lifting of the ban against TV advertising.

1 Budd et al, 2001 p.4

At the same time, the report called for the removal of gambling machines from 'ambient premises', such as chip shops and taxi offices. It considered a prohibition against gaming machines in pubs and clubs (at the time there were roughly 72,000 machines in public houses) but decided against this measure on the grounds of practicality rather than principle.

Budd's logic was consistent – where consumers were making an active choice to gamble, they should benefit from healthy market competition; but gambling should not be allowed to creep into non-gambling venues.

The internet – which had the potential to expand access to gambling on an unprecedented scale – provided the biggest challenge for Budd. Its recommendation to permit online gambling – at a time when the instinct of many governments was to prohibit – seems particularly far-sighted. The Review Body considered a ban on online gambling would penalise consumers and that enforcement would be both impractical and economically self-defeating.

In the 15 years since the Budd Report was published, choice has been extended considerably for adults wishing to gamble in Great Britain. Changes to opening hours and the removal of both the 24-hour rule and the demand test have made gambling venues more accessible. The modernisation of casino regulations has contributed to strong growth in visits (from a low base) by creating incentives for investment. More significantly, the green light given to remote channels has liberated gambling from the control of licensed venues. Adults in Britain are quite simply freer to gamble than they were prior to the Gambling Act. Increased competition (allied to investment and technological advances) has resulted in product innovation as well as venue investment. Server-based gaming machines, the creation of in-play betting and the expansion of betting 'markets' have extended consumer choice in wagering options.

In terms of pricing, the customer has benefited from increased competition. The internet has played a significant role in improving the odds of gambling, with operators passing on cost benefits of remote operation (mirroring the behaviour of wider internet retailers). The house win margin has been sustained at much lower levels online than those available in venues, reflecting different betting patterns (more football, more in-play) but also better value for the consumer.

One possible by-product of this margin erosion is that online sports betting firms have (allegedly) become more focused on limiting damage from successful customers. Offering greater value for the mass has been offset by restricting betting volumes for the small group of 'punters' who consistently beat the odds[2]. In business terms this appears to be a valid risk management technique but it may not be entirely in keeping with the spirit of Budd.

Viewed through a different set of lenses, the benefits of reform are not so clear. The growth in expenditure on remote gambling has not been entirely incremental; indeed, a large proportion has been offset by declines in gambling venues. The Review Body expected that its reforms would lead to an increase in the amount of gambling - and this has indeed transpired. It also expected that better regulation would lead to better experiences and so increased participation – but this has not occurred. Despite the extension of choice and accompanying improvements to quality, service and value, the proportion of adults in Britain who gamble (excluding the National Lottery) has remained fairly stable; and only a small minority gamble regularly.

2 Justice for Punters, 2016

The growth in industry revenues since the 2005 Act appears to be the result of a similar number of people spending increased sums on generally 'harder' (fast, highly repetitive) forms of gambling. Since 2001, the number of arcades and bingo clubs in Great Britain has declined precipitously. The number of betting shops has fallen too, while growth in the number of casinos has been considerably below expectations.

If a rebalancing of gambling expenditure from venues to remote was an inevitable consequence of advances in technology and changes in consumer behaviour, it has nevertheless been accentuated by post-Budd Government policy. This has unwittingly handed competitive advantage to remote operators and hindered the development of gambling venues. One of the major themes of gambling in Britain over the last decade has been the penning of venues within product-centric constructs designed in the 1960s while leaving remote operators largely unfettered.

Of course, it is easy to blame regulation but what is perhaps most remarkable is that traditional gambling firms have accepted this situation. With remote operators cornering the market on convenience and cost, the opportunity for venues ought to be in the communal and the experiential (mirroring the ways that cinema responded to television) – but in general this has not transpired. If the current attrition of bingo clubs, arcades and betting shops continues (along with the stagnation of casinos outside London) – and is not replaced by something similarly experiential – then we may find the range of options for consumers has in fact contracted.

So what does the consumer think of how gambling has changed in the last 15 years?

The four large-scale prevalence surveys carried out between 1999 and 2012[3] suggest that (at the mean) societal attitudes towards gambling have not changed significantly. If anything, there has been some polarization, with scores increasing for both libertarian and prohibitionist sentiments. Gambling Commission surveys reveal something more concerning - that trust in gambling companies has fallen. In 2008, 49% of respondents agreed that they trusted gambling companies but by 2015, this had dropped to 39%. Trust levels among gamblers though higher than amongst non-gamblers have dropped at a faster rate (from 61% in 2008 to 45% in 2015)[4].

Whether or not the consumer has truly benefited from the reforms that Budd set in motion seems to be a question of how one defines the consumer (choice has not expanded uniformly amongst all by age or culture) and their needs (in terms of gambling as a transaction or as the basis for a social activity).

Protecting the Vulnerable

At the time of its publication, The Budd Report provoked fears that extension of choice would inevitably lead to more gambling and elevated levels of harmful gambling. On the face of it, these fears would appear to have not materialized. The rate of problem gambling in Great Britain – we are reassuringly told - has remained largely unchanged (0.5% to 0.8% of the adult population) between the time of the first British Gambling Prevalence Survey in 1999 and the most recent consolidated Health Surveys in 2012[5].

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3 Sproston et al, 2000; Wardle et al, 2007; Wardle et al (2011); Wardle et al (2014)
4 Gambling Commission, Public Perceptions of Gambling, 2015
5 Sproston et al, 2000; Wardle et al, 2007; Wardle et al (2011); Wardle et al (2014)

These data are commonly used to suggest that despite the growth of the gambling market (and the development of new products), no additional harm has been caused. There are a number of reasons to exercise caution when considering this view. For one, it ignores research on adaptation[6] – that in the absence of supply-side change, rates of problem gambling will decay over time as exposure effects wear off. Stable rates of problem gambling may not necessarily signify an absence of additional harm. The very facts of the rapid expansion of gambling's availability, the significant growth in expenditure and the shift in consumption towards fast, repetitive forms – as well as the increasing physical dislocation between operator and customer – should prompt further enquiry.

In its 2010 report, the Australian Productivity Commission[7] identified a number of limitations of prevalence survey findings, expressing concerns about representativeness, the likelihood that problem gamblers would answer questions honestly, the subjective nature of any scoring mechanism and the appropriateness of using diagnostic screens designed for clinical settings. Some have questioned whether asking people to assess their own behaviour – even where done honestly and accurately – is likely to be effective in identifying harm. As Shaffer (2001) wrote, *"One of the primary concerns about DSM-IV centres on how it has advanced the reliability of psychiatric diagnosis at the cost of diagnostic validity*"[8].

Lastly, problem gambling screens are designed to capture something of the individual's relationship with gambling. They do not attempt to identify actual harm to the gambler or to others – such as family members or employers. Unfortunately, there is no agreed framework in place to understand the true extent of gambling-related harm in Britain (just as there is no yardstick for its benefits).

Some have expressed concern at the increase in calls to the national gambling helpline (operated by the charity GamCare), which more than doubled between 2009 and 2015[9]. This may reflect greater awareness of the helpline and improvements in 'sign-posting' – but this is far from clear. The GamCare data show that the increase in that period was from calls where the prime mode of gambling related to internet gambling or B2 machines in betting shops (which were also the two largest areas of expenditure growth in the period).

Problem gambling is still not considered a major public health issue in Great Britain. In March 2015, the Department of Health admitted that it had not conducted any "*discussions with other Government departments on the subject of a national gambling strategy,"* before going to acknowledge that *"The Department has not made an assessment of the effects of gambling on mental health. We do not centrally hold information on the amount spent on counselling for people with a gambling addiction in the last 12 months."*[10]

6 Abbot et al, 2014 p.18
7 Banks et al, 2010, section 5.3
8 Shaffer, 2003, p.176
9 GamCare, 2016
10 Hansard, 2015

Budd's recommendation that different modes of treatment for gambling addiction be evaluated to ensure effective resource allocation was not adopted until 2015 when the Responsible Gambling Trust (RGT) published a reporting framework for treatment providers. Similarly was Budd's proposal that regulatory change (e.g. increasing stake and prize limits on machines) be accompanied by studies of attendant harm has only recently become a requirement. In recent years, the RGT has produced a number of valuable studies of gambling-related harm, there is still no long-term, sequential research programme into the benefits and costs of gambling. It is difficult to escape the conclusion that not much has changed since the Review Body's lament that *"the provision (of research into problem gambling) is woefully inadequate"*[11].

Economic Impact

"The desirability of creating an environment in which the commercial opportunities for gambling, including its international competitiveness, maximize the UK's economic welfare."[12]

Governments are often accused of liberalizing gambling regulations in order to stimulate economic benefits in the form of investment, taxation and employment. Yet for Sir Alan Budd's Review Body, such 'benefits' were secondary to the creation of consumer surplus. There was little in the Budd Report concerning the economic impact of revising Britain's gambling laws. In direct contrast to policy motives in other markets that were considering gambling reform at this time (notably Singapore), the Review Body was interested in gambling as a form of enjoyment for people in Britain rather than as a source of income from visitors to the country. Budd touched briefly on taxation – and such matters were entirely excluded from the scope of the Gambling Act.

Given that Budd set no specific goals in terms of economic benefits, it is difficult to judge whether events have met expectations. Nevertheless, it is possible to describe what has happened in terms of gambling's economic impact in the period since the Gambling Act.

Taxation

In 2007, the then Shadow Chancellor of the Exchequer, George Osborne wrote that *"Constant tinkering has made the tax system (for gambling) increasingly complicated, discouraging investment."*[13] The criticism was valid – even if Osborne would himself tinker with it further once installed as Chancellor. Britain's gambling taxation was (and remains) a patchwork quilt of different structures and different rates; the result of evolution rather than design. In 2001 gambling revenues (excluding the National Lottery) were subject to three different forms of taxation – VAT, annual fees and gross profits tax - which were sometimes used in combination (see Table 1).

Table 1
Gambling Sales Taxes (2001)

Tax	Activities	Rates
Gross profits tax	Betting, betting exchanges, casino table games, football pools and some bingo	0% to 40%
VAT	Poker	VAT standard rate (17.5%)
VAT + gross profits tax	Bingo	VAT standard rate + 15% GPT
Licence fee + VAT	Gaming machines	£250 to £1,815 per machine per year VAT standard rate

11 Budd et al, 2001
12 Budd et al, 2001 p.6
13 The Rank Group, 2013 p.53

Some gambling activities were subject to low tax or no tax (on-course betting remains untaxed while at that time, casinos were subject to a starting rate of 2.5% duty on gross profits); while others were much higher (the marginal rate on table games in casinos was 40%). By dint of its non-regulated status, online gaming was not dutiable (although online sports betting was taxed at 15% of gross profits).

Gambling taxation has remained the subject of Government tinkering. During the last decade, the annual Budget statement has featured no fewer than ten structural changes to gambling taxation – three for remote gambling, three for bingo, two for casinos and two for gaming machines. Only in three out of those 11 years, were gambling duties left structurally unchanged. Most of the tax changes have resulted in higher operating costs. Some simplification has occurred. All gambling activities (excluding the National Lottery) are now subject to gross profits tax alone – but the system remains complicated with rates running from 0% to 50% (see Table 2).

Table 2
Gambling Taxation (2016)

Activity	Duty rate
On-course betting	0%
Low-stake, low prize (Category D) gaming machines	5%
Bingo	10%
Off-course betting, online betting & gaming, football pools	15%
Gaming machines (Categories C, B4, B3 and B1)	20%
Gaming machines (Category B2)	25%
Casino table games	15%, 20%, 30%, 40% & 50%

During the period, the total amount of sales taxes collected from gambling by HMRC has grown from around £1.7bn a year in 2004/5 to £2.2bn in 2014/15 (it is difficult to be precise as net VAT income from gambling was not reported). These gains appear relatively modest when one considers the growth in gambling expenditures over the same period. Exchequer's slice of the action diminished in the decade after the passage of the Gambling Act, in spite of the generally upward direction of revisions to duty rates. This paradox is explained by the growth of remote gambling, where duty was set at the relatively low rate of 15% and payment effectively rendered optional.

While consumption of online gaming had always been permitted, establishment within the United Kingdom was banned prior to 2007. The full implementation of the Gambling Act allowed firms to come onshore, where some of them already had their online sports betting operations; but, it did not require them to do so. Firms could legally target and transact with British citizens so long as their operations were established within the European Union or within one of a number of 'white-listed' territories.

The rates of duty in these offshore jurisdictions were typically of the order of 1% to 2% of gross profits which compared favourably to the 15% rate set by HM Treasury in the Budget of 2007. With no regulatory requirement to decamp to the UK and fairly powerful tax incentives to remain offshore, operators (including the State-owned Tote) stayed put. Not only did they remain offshore, but gradually most of the large online betting operators migrated their sportsbooks there too. From an operational perspective, it made sense to centralize remote operations but there were also a number of tax benefits. With no carrot to offer nor stick to wield, Government's share of the remote gambling boom dwindled.

This laissez-faire attitude to online gambling tax receipts ran counter to Budd, which had recommended that *"only on-line gambling sites that are licensed by the Gambling Commission should be permitted to advertise in Great Britain"[14];* and that licensing conditions include the requirement to be registered as a British company and to locate one's internet server onshore.
Budd went further: *"The Gambling Commission should have a clear code of practice to prevent licensed sites diverting most of their British custom to an overseas site in order to avoid regulation or paying tax."[15]*

A system of British taxation for British consumers was finally introduced in December 2014 – more than seven years after the opportunity first presented itself. There is still no requirement to be based in Great Britain, but operators wishing to target UK consumers must be licensed by the Gambling Commission and duty is now levied on the location of the customer rather than the server. HM Treasury's reluctance to tax the burgeoning online market seems to have been grounded in a fear of EU litigation. In 2009, minister Sarah McCarthy-Fry explained[16]: *"When we introduced remote gaming duty in 2007, we looked closely at the options for taxing offshore operators on the basis of place of consumption. However, we concluded that it would be difficult to ensure compliance with any such regime without co-ordinated international agreement. We believe that that remains the case today."*

Even as other EU countries began to legalise and tax online gambling (Italy in 2006, France in 2010, Spain and Belgium in 2011), Britain dallied before finally following suit in 2014. We cannot know whether the more general application of duty to remote gaming would have hindered market growth. However, if we apply a 15% rate of duty to estimates of online gambling expenditure between 2007 and 2014, it suggests that HMRC may have foregone as much as £1bn.

Employment

The Budd Report paid little attention to the question of whether better gambling regulation might lead to job creation. Nevertheless, it seemed a reasonable expectation at the time that increasing consumer choice (and so expanding the market) – particularly the development of resort casinos - would result in higher levels of industry employment. Instead, the number of people employed by gambling companies in Great Britain (as reported by the Gambling Commission) declined by 16% (or around 21,000 employees) in the period between 2009 and 2015[17]. This was due in part to the shift of expenditure and supply towards remote operations (the majority of which were located offshore) and away from labour-intensive venues. As consumption shifted online, so land-based operators closed premises and sought cost reductions in remaining units. Venues became increasingly reliant on takings from labour-light gaming machines rather than traditional primary forms of gambling (notably bingo and sports betting).

14 Budd et al, 2001 p.5
15 Budd et al, 2001 p.170
16 Hansard, 2009
17 Gambling Commission Industry Statistics, 2014 and 2016

Cost-benefit Analysis

The 'Central Dilemma' for the Review Body lay in balancing the benefits of enhanced consumer choice against potential costs of human and societal harm; yet its report did not include any systematic analysis of economic costs and benefits. With Budd silent on how to gauge the effectiveness of gambling policy, we must look to other sources.

The Eadington-Collins cost-benefit hierarchy of gambling[18] (which argues that some modes of gambling are more beneficial to society than others) provides a useful prism for viewing progress; and suggests that Budd's aspiration for gambling policy to "maximize the UK's economic welfare" has not materialised. Bill Eadington and Peter Collins stated that the greatest ratio of economic and societal benefits to costs were to be found where:

- Gambling was harnessed to wider non-gambling activities (such as hotels, restaurants etc).
- Gambling anchored the provision of wider amenity.
- The mode of gambling required pre-determination (destination) rather than impulse (convenience).
- The mode of gambling attracted customers from outside the jurisdiction.

It is striking that the development of Britain's gambling market has been largely shaped by growth from the lower levels of the Eadington-Collins hierarchy and an absence of activity in the upper echelons.

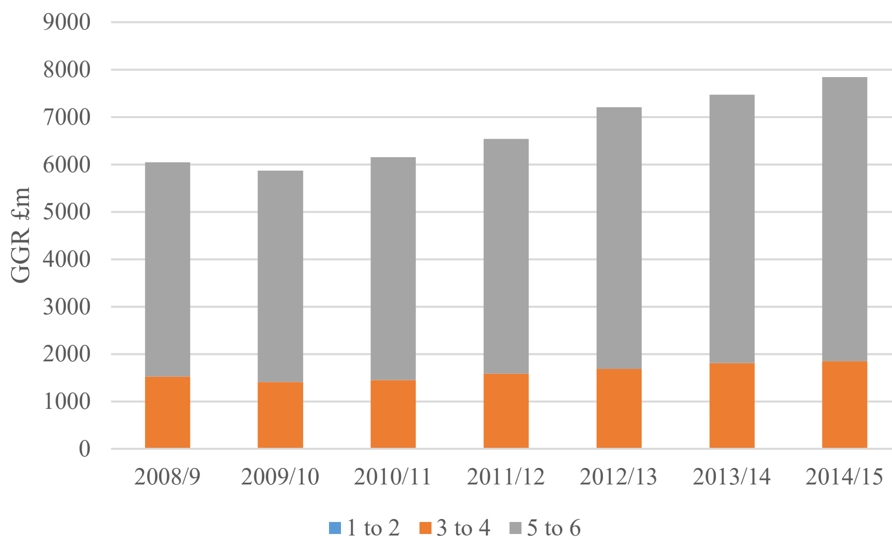

Figure 1. The development of gambling expenditures in Great Britain by adapted Eadington-Collins hierarchy (1 to 2 = highest cost:benefit ratio; 5 to 6 = lowest cost:benefit ratio)[19]

18 Eadington et al, 2011

19 Gambling Commission Industry Statistics, 2014 and 2016

This is of course partly inevitable - the growth of remote gambling sits within a broader shift of commerce from the physical to the virtual. However, it is also the result of conscious (if somewhat haphazard) policy-making. Instead of plans for the development of destination casinos (nixed by media and political pressure), Britain witnessed rapid expansion in online gambling and electronic roulette in high street betting shops – in each instance the result of policy decisions.

Protecting Children

"In the case of children, our proposals move towards some tightening of regulation."[20]

Concern for the welfare of children in relation to gambling was a clear feature of the Budd Report – so much so that in hindsight it appears to be the high-water mark for the issue. The Review Body's fears were essentially two-fold – first that the existing provision of slot machine gambling for minors might be harmful; and second that the expansion of gambling (in particular via the internet) and its increased visibility might lead to elevated levels of youth gambling and greater harm. The report stated, *"We are persuaded by the weight of evidence that children and young people are especially vulnerable to the risks of becoming problem gamblers. This has led us to make recommendations that would reduce their opportunities to gamble, or to see others gambling."*[21] As well as recognizing the heightened vulnerability of children to gambling-related harm, Budd was also aware of the links between problem gambling and early initiation.

The Review Body considered banning gambling on machines by under-18s but stopped short out of respect for seaside towns (where arcades assumed a cultural and economic importance). Instead it limited its recommendations to capping stakes and prizes on machines that could be made available to children (these became category D machines) to gradually 'soften' the nature of the gambling; and the removal of machines from ambient premises such as chip shops and taxi offices where effective supervision might not be available. The report also recognized fears that the expansion of gambling opportunities via the internet might pose increased risks to young people, noting Australia's National Office for the Information Economy's view that *"interactive gambling will expose new audiences such as young people to gambling, thereby increasing the potential for an overall increase in problem gambling."*[22]

20 Budd et al, 2001 p.4
21 Budd et al, 2001 p.90
22 Budd et al, 2001 p.167

Some 15 years later, the fears of the Review Body still appear reasonable. Yet what is striking is that according to the limited evidence available, not only have reported rates of gambling and problem gambling amongst children in Britain decreased but the internet has not yet presented as a significant mode of youth gambling. A series of surveys into gambling by children conducted by Ipsos Mori[23] have shown that while problem gambling prevalence amongst children is worryingly high (by comparison with rates in the overall population), both gambling and problem gambling appear to have declined over the course of the last decade. While prevalence surveys are not perfect, they appear to show that internet gambling is not especially popular amongst children. It seems plausible that the account-based nature of online gambling along with the industry's 'Know Your Customer' checks may have been successful in restricting gambling by minors. The decline of Family Entertainment Centres (arcades) and pubs and the Budd-inspired prohibition against ambient gambling has also led to reduced opportunities for legal machine gambling by children. At the same time, there may be some substitution effect from the expansion of non-gambling games (such as esports and gaming via social networks).

Where underage gambling rather than youth gambling is concerned, remote gambling presents more prominently. Gambling Commission data suggests that illegal gambling by under-18s may be most prevalent in the remote and betting shop sectors. In the 12 months to September 2015, the Commission was notified of 65,731 incidents where individuals having gambled were subsequently unable to provide proof of age[24]. Of these, nearly 60% were received from online operators while 36% related to remote gambling (the reliability of the data depends upon the operator's willingness to both challenge players on age and to report breaches).

Figure 2. Reported underage gambling (challenged having gambled but unable to prove age) by licensing regime in Great Britain (to September 2015)

23 Ipsos Public Affairs, 2015

24 Gambling Commission Industry Statistics, 2016

The reported incidence of underage gambling is relatively low but seemingly skewed towards two areas of gambling which have experienced the greatest growth in the period since the Gambling Act.

Despite widespread acceptance of problem gambling vulnerability, there is little provision in terms of prevention or treatment services for children. By and large, school children are not made aware of the risks of gambling (in the way that they are with other public health issues, such as alcohol or drugs) – as Budd[25] and others have recommended. There is no dedicated youth gambling treatment service – and very few children seek help via GamCare's national helpline.

The Budd Report had recommended that a review of gambling amongst minors be carried out after five years[26]; yet 15 years on from Budd and 11 years after the Gambling Act was passed his review has still not taken place. The Review Body's concern about the effects of gambling on children does not appear to have been shared to the same extent by successive Governments.

Casinos

Of all the recommendations contained within the Budd Report, it was its advocacy of greater consumer choice within the casinos sector that most caught the imagination of the public (and attracted the scrutiny of the press) – so much so that Budd and the 2005 Gambling Act seemed in the popular imagination to become synonymous with 'Las Vegas-style gambling'. Of the 176 recommendations, just 21 related solely to casinos. These included the abolition of a number of measures designed to restrict both supply and consumption, as shown in Table 3). Budd proposed that each of these should be abolished or amended - and the Government largely agreed, incorporating the majority of Budd's casino recommendations within the Gambling Act. The Review Body anticipated that new commercial freedoms for casinos would stimulate growth in supply (from a base of around 120 clubs in 2001), that the quality of venues would improve in response to regulatory changes and that there would be an increased volume of people using casinos. All of these things did indeed occur – but at levels far below expectations. The number of casinos in Great Britain reached 140 in 2006[27] and has since remained around this level, despite the fact that a substantially greater number of licences have been granted and are available for use. Why is this?

Table 3

Major changes to casino regulation proposed within Budd Report

Casino supply restrictions in 2001

- Casinos only permitted in 53 towns and cities in Great Britain;
- New casino licence applicants required to demonstrate that existing (local) supply is insufficient to meet customer demand;
- Casinos restricted to ten gaming machines;
- Advertising heavily restricted.

Casino - consumer restrictions in 2001

- New customers required to register as club members 24-hours before playing;
- Gaming machines limited to maximum stake of £1 per spin and maximum prize of £2,000;
- Live (non-gaming) entertainment not permitted in the casino;
- Alcoholic drinks prohibited on the gaming floor.

25 Budd et al, 2001 p.173

26 Budd et al, 2001 p.4

27 Gambling Commission, 2006

First, not all Budd's recommendations survived the legislative process. Amidst political and press fears of societal damage from casino expansion, the Government compromised on Budd's vision of a free (but well-regulated) market. Thus the Act made provision for just 17 enhanced casinos under three separate categories:

- Small – eight casinos with the ability to offer up to 80 machines (based upon a 2:1 machines: tables ratio) and sports betting;
- Large – eight casinos with the ability to offer up to 150 machines (based upon a 5:1 machines: tables ratio), sports betting and bingo;
- Regional – one casino with the ability to offer up to 1,250 machines (based upon a 25:1 machines: tables ratio), including unlimited stake and prize (Category A) machines plus sports betting and bingo.

Existing casinos would receive a more modest increase in gaming entitlement (the maximum number of machines rising from ten to 20 with stake and prize limits increasing to £2 and £4,000) and their rights would be 'grandfathered'.

As part of the transition from the 1968 Act to the 2005 Act, a guillotine was imposed on new casino licence applications in April 2006. This prompted a number of operators to apply for licences even if they did not have full commitment to open. Applications were bound by the old 'permitted areas' and 'demand test' requirements and licences were not transferrable between local authorities. Later that year, the Gambling Commission stated that if all new applications for casino licences were permitted (and all licences made operational), the number of casinos in Great Britain would rise from 140 to 259 (including nine card rooms) – but this did not transpire.

The application of the 'demand test' to new applications resulted in licence rejections in the majority of cases. As a result, the theoretical maximum of 259 casino licences in 2006 had fallen to 187 just a few years later.

Interest in casino development was dampened in March 2007, when HM Treasury radically restructured the bands of casino games duty. This had the effect of substantially increasing duty costs for small casinos and creating a high marginal duty rate for large or high-end casinos. In the year immediately following the duty increase, a number of small casinos were closed and investment plans for other casinos were shelved as companies adjusted to the tax increase.

In 2016, there are 147 casino licences in operation (in some cases, with more than one licence per premises) and 40 licences still 'cold'[28]. Casino visitation has increased substantially – due to improvements in supply and accessibility – rising from 11.8 million in 2002 to 20.9 million in 2015. However, prevalence survey results show only a marginal increase in the proportion of adults playing table games in a casino (from a base of around 3%) with gaming machines and non-gaming activities perhaps more benefiting from the increase in visits.

The value of the casino market has also grown strongly. Table gaming revenue increased from £464m in 1998 to £995m in 2014 with machine revenue also growing strongly from a low base; yet the major part was generated in London (benefiting from a buoyant VIP market and improvements in the quality of supply for the mass market). Outside London, the sector's performance has been more muted.

28 Gambling Commission Industry Statistics, 2016

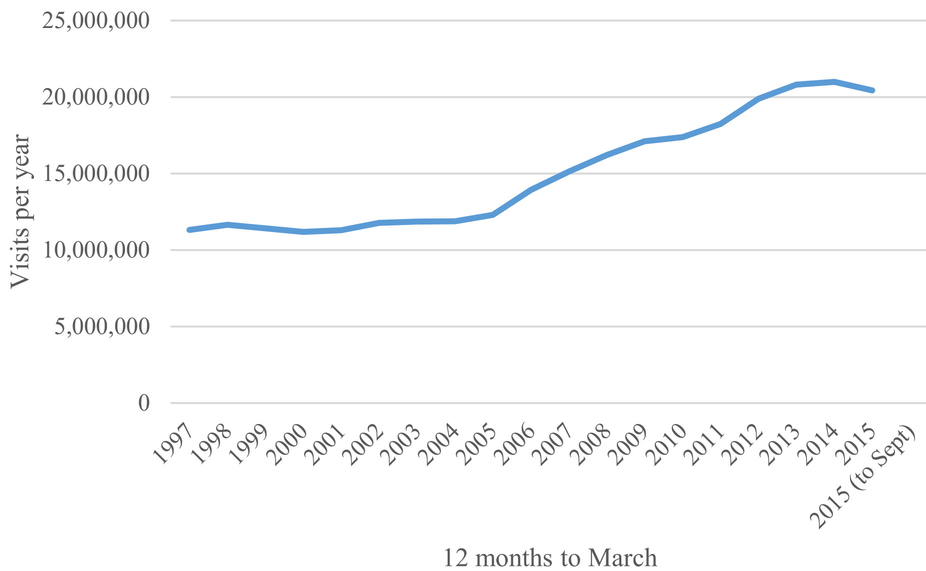

Figure 3. Casino visitation in Great Britain, 1997 to 2015[29]

Budd viewed the restrictions placed upon casinos (which encouraged the development of small clubs with limited appeal) as being inimical to consumer interests and likely to impede the sector's international competitiveness. The Review Body did not comment on the commercial viability of resort casinos in Great Britain; nor did it attempt to model the economic benefits. It simply proposed that legislation should make their development possible. This proposal was carried through to legislation (albeit in the form of a limited trial of 17 new licences only one of which offered the potential for a resort casino) – but trouble lay ahead. The 2005 Act had created a two-stage process for determining where, when and how the new casinos would be developed. First, the Casino Advisory Panel would determine which local authorities would host the casinos; then the local authorities themselves would run open tender processes to award the licences to operators.

In January 2007, Manchester City Council was awarded the prized Regional casino[30] (or 'super-casino as it was dubbed by the national press) licence – but matters swiftly unravelled from there. Refusing to accept defeat, the bid team from the seaside town of Blackpool (which the Budd Report had identified as the type of location that might be suitable for a resort casino) lobbied MPs and Peers to overturn the decision. In March, the House of Commons narrowly ratified the choice of Manchester; but later that month it suffered defeat in the House of Lords. It is possible that the Government might have prevailed had it tried again, but just weeks later the Prime Minister Tony Blair stepped down from office, making way for his Chancellor of the Exchequer, Gordon Brown to succeed him. Brown had supported the revised gambling legislation and his Treasury team had taken a keen interest in the economic potential of resort casinos. Yet once installed as Prime Minister and with the administration's popularity waning, Brown sought to distance himself from the politics of his predecessor. For the son of a Presbyterian minister, the opportunity to strike a moral pose against gambling must have seemed too good to resist.

29 Gambling Commission Industry Statistics, 2016
30 Crow, 2007

Later that year, the Government announced that the Regional casino would be abandoned (the other 16 licences were quietly approved by Parliament). Six years after Budd had recommended resort casinos, the 'experiment' was stillborn. The Regional casino licence found itself suspended in limbo – established in primary legislation but lacking the political support to be made real. Even after this, there would be further disappointment. Of the 16 remaining 2005 Act licences, ten were awarded to local authorities in the existing permitted areas, meaning that Budd's proposed extension of choice would be restricted to just a handful new locations – a number of which were in close proximity to existing 'permitted areas'. Meanwhile, the March 2007 increase in casino games duty caused operators to scale back investment plans, prompting dissipation of enthusiasm from the local councils who had fought to win the licences.

In 2016, four of the 16 licences have yet to be awarded and just three new venues have opened (a number of licences have simply been transferred to existing 1968 Act casinos). Only one of the new developments – the £200m Genting Resorts World at the National Exhibition Centre outside Birmingham can truly be considered to embody the consumer benefits that Budd envisaged. The permitted areas, abolished in the legislation, live on in practice with a slight expansion from 53 to 59. Moreover, with the exception of tenders for the 2005 Act licences (which are now either closed or suspended), it has for the last decade been impossible to apply for new casino licences. Perversely, barriers to entry and competition in Britain's casino market are higher than they were at the time of the Budd Report.

It is in the area of casinos that Budd's aspirations have most clearly failed to materialize. In his essay, 'The Great British Casino Shambles', Collins delivered the following verdict on the nation's casino reform programme: *"It is a story of large numbers of intelligent people devoting a great deal of time and energy to a sensible project of reforming UK gambling law and yet winding up with a law that everybody recognizes is radically defective especially in respect to the crucial issue of casino gambling."*[31]

Remote Gambling

Perhaps Budd's most far-sighted recommendation was its advocacy of remote gambling regulation. It considered that the development of internet-based gambling was on balance positive in terms of consumer choice and that the nature of e-commerce was likely to render prohibition ineffective anyway. Thus Great Britain became the first major economy in the world to state the unambiguous legality of online gambling.

Britain's remote gambling sector has experienced sustained and impressive growth in the years since Budd. In 2015, consumers in Britain spent an estimated £4bn on online and mobile betting and gaming[32], making it the largest regulated market (excluding sales of lottery tickets) in the world. Yet while Budd took a liberal view of remote gambling, it also recognized concerns on social costs – notably problem gambling – and advised that the activity be subject to 'casino-style' regulation. What happened instead was that remote gambling was allowed to flourish under a system of light-touch regulation (with domestic licensing optional until December 2014). The contrast with land-based regulation is striking - all forms of gambling may be made available within a single site; there are no caps on licence issuance; betting on credit is permitted; and traditional stake, prize and speed of play specifications do not apply.

31 Collins, 2009 p.103

32 Gambling Commission Industry Statistics, 2016

To date, the worst fears of social harm in relation to remote gambling appear to have been avoided. Compared with other sectors, the prevalence of problem gambling is middling – above bingo and slot machines but below casino games and machines in betting shops. Indeed, research by *Philander et al*[33] based upon the British Gambling Prevalence Survey 2010 indicates that participation in remote gambling (as part of a broader repertoire of gambling) is related to a decrease in problem gambling severity. The authors speculate that this may be due to the presence of a larger number of disruptive factors (at home or in the office for example) compared with the more immersive environment of a casino, arcade or betting shop and the ability of operators to offer lower stake minimums.

The area of greatest controversy for remote gambling thus far has been less about products and more about visibility. The easing of restrictions on TV advertising for gambling which took effect in 2007 was eagerly welcomed by remote gambling companies – but has also become a source of regulatory sensitivity. In its 2013 report, Ofcom revealed that the number of TV advertising spots for gambling (which are dominated by remote gambling) had increased by more than 900% between 2006 and 2013[34]. Moreover, online bingo (which controversially benefits from a pre-existing carve-out for bingo clubs to advertise prior to the 9pm watershed) represented the largest slice. In 2013, gambling adverts made up 4.1% of all TV advertising spots (by contrast, gambling represents less than 1% of household expenditure). Gambling companies spent an estimated £141m on TV advertising in that year – but this excluded other forms of TV-led marketing, such as football shirt sponsorships.

Crime

One of Budd's key aims was to keep crime out of gambling - from criminal involvement in gambling operations to the exploitation of legitimate gambling enterprises for criminal purposes to the commission of crimes in order to fund gambling. The Review Body considered that Britain had done a pretty good job in this area but that there were areas for improvement (particularly in relation to unregulated operations) and reasons to be concerned that changes in the market might provide greater scope for criminal activity if not checked by regulation. Fifteen years on, gambling does not appear to have become a major source of crime or disorder in Great Britain. The licensing regime that Budd helped to define has been largely successful in keeping organized crime out of gambling operations; and there is no evidence of any sizeable black market for gambling. The key area for concerns today are linkages between gambling and the proceeds of crime, problem gambling as a cause of crime and acts of criminality committed against gambling companies and their employees.

Between 2015 and 2016, six of Britain's largest gambling companies were issued with anti-money laundering penalties totalling £3.75m (these generally related to the proceeds of crime rather than systematic 'washing' of criminal funds). This rash of cases suggests that the full extent of money laundering via gambling may be greater than previously imagined and has led to operators tightening scrutiny and controls. HM Treasury is at present considering changes to regulations as part of the adoption of the EU's Fourth Directive on Anti-Money Laundering, although it has rated both casinos and betting shops as relatively low risk (lower for example than estate agents or retail banks).

33 Philander et al, 2014 p.218
34 Ofcom, 2013

One area of intersection between gambling and crime that was deliberately excluded from the scope of the Budd Report was violence against gambling company employees. Budd legitimately considered that this was an area for health and safety legislation rather than gambling regulation. There is a long history of robberies (sometimes violent) of gambling establishments, where employees are put at risk by the presence of large amounts of cash – much as they would be if they worked in high street banks. Such offences are rightly addressed under criminal law and gambling companies have a clear economic incentive to limit opportunities for such acts. However, in recent years it has been alleged that changes proposed by Budd and instituted under the Gambling Act have in themselves given rise to attacks on employees in betting shops, by making late-night operation both feasible and profitable (due to expenditure on gaming machines). Critics go further and argue that the violence may in some cases be triggered by disordered play on the machines - and that gambling regulations ought therefore to be changed in response.

During a debate in the House of Lords in September 2016, the former Secretary of State for Culture, Media and Sport, Dame Tessa Jowell[35] (who held Cabinet responsibility for the passage of the Gambling Bill) said:

> *"My Lords, does the Minister not accept that, by allowing the proliferation of crime, one of the founding principles of the Gambling Act, which gave this country the most regulated gambling industry in the world, is being undermined? Further, does she not accept that it is time for the Gambling Commission to become more interventionist in controlling the risks from fixed-odds betting machines and that it is time to give local authorities the partnership power to regulate planning consent to limit the number of betting shops?"*

Gambling policy in relation to crime may broadly be judged a success – but further scrutiny is required to ensure that this remains the case as the market evolves.

Flexible Regulation

The Budd Report recognised that the potential for technology to change how people gamble necessitated responsive legislation. Encumbering relatively modest regulatory changes with Parliamentary process was to be avoided where possible. Instead, the Secretary of State and the Gambling Commission would recalibrate regulation via statutory instrument and Licence Conditions and Codes of Practice. To the extent that gambling has necessitated just one new piece of primary legislation since 2007, this appears to have been at least partly successful. During this period, the Department for Culture, Media and Sport and the Gambling Commission have made a large number of regulatory modifications without too much fuss. The creation of the Gambling Commission - a single regulatory body for all forms of gambling (except spread betting, which is regulated by the Financial Conduct Authority) - has created a more consistent approach to governance.

35 Hansard, 2016

Against this, a long list of unresolved regulatory issues suggests flaws in the system. That list includes the long-running saga of high stakes machines in betting shops, concerns over the prevalence of gambling advertising (particularly prior to the watershed), the failure of the resort casino experiment to take place, claims of misuse of the licensing regimes for bingo clubs and betting shops (to gain superior machine entitlements), incipient devolution of gambling regulation (starting in Scotland), concerns regarding adequacy of resources to tackle gambling-related harm and allegations that research into problem gambling lacks independence. Over the course of the last decade, gambling has been the subject of the full range of Parliamentary procedure - Private Members' Bills, Early Day Motions and Parliamentary debates and thousands of Parliamentary Questions. In recent years, the volume of gambling issues raised by MPs has grown while the tenor of discourse has become progressively negative.

The Triennial Review remains Britain's sole (notionally) regularized mechanism for assessing the suitability of gambling regulations. Yet, despite its name, the Government has completed just one of these reviews in the 11 years since the Gambling Act was passed. The review has been limited arbitrarily to the question of what maximum stake and prize limits should apply to gaming machines. Other structural characteristics (such as speed of play, return to player etc) have historically fallen outside the scope of the review as have environmental aspects (including machine numbers and remote gambling). Evidence gathering to support policy decisions has been hampered by the absence of a structured, long-term programme of research into benefits and costs.

Matthew Hill, regulatory risk and analysis director at the Gambling Commission between 2008 and 2015, described as *"monumental hubris"* the idea that the 2005 Act would lead to an era of agile response to regulatory challenge: "*There was this notion that the legislation had been in some way future-proofed – yet the system started creaking pretty much from the start."*

Political instability may also have hampered effective governance of the industry. In the decade, prior to the 2005 Act's implementation, gambling was overseen by two junior ministers and two Secretaries of State. In the nine years following, gambling has had five junior ministers and no fewer than seven Secretaries of State. At the same time, cuts to Government spending have seen staffing levels and resources shrink at the Department for Culture, Media and Sport. Looked at in 2016, gambling does indeed seem to be subject to a more responsive legislative-regulatory framework; but it is far from perfect. This is due to two key factors. First, that certain aspects of regulatory reform (for example the expansion of casinos outside the 'permitted areas') still require primary legislation; second, that legislation requires the political will to use it intelligently. The negativity that accompanied a good deal of political discourse on the 2005 Act appears to have greatly diminished the appetite of Government to intervene – particularly if such interventions are related to the further expansion of consumer choice.

Conclusion

Fifteen years on from the publication of the Budd Report, the act of gambling has changed profoundly. Opportunities to gamble have never been as widely available, nor competition for gambling expenditure as high. The cost per unit of gambling (in terms of win/loss margin) has generally improved in the consumer's favour – largely as a result of market disruption from online operators. Yet as remote gambling has marched onwards and venue-based gambling has retreated (through the closure of bingo clubs, arcades and betting shops), it is possible that some degree of choice may have been lost.

So far as we can tell from prevalence surveys, the number of people in Great Britain who gamble has not changed dramatically in the period. However, gambling expenditure has increased markedly so it may be that those who do gamble are gambling more. Given that some of the largest sectors of the gambling market by value (remote gambling, B2 gaming machines, casino table games) also have relatively low levels of participation, it seems reasonable to conclude that it is the growth of gambling expenditure amongst a relatively small proportion of the population that has driven the market forward.

There is little evidence that gambling has become more valued by consumers or the public at large. Indeed, levels of trust in gambling companies appear to have eroded dramatically over the course of recent years – with the greatest declines amongst those who gamble.

On the face of it, market growth has not been accompanied by any increase in problem gambling. However, there are a number of reasons to exercise caution here. We simply do not know whether or not the deleterious effects of gambling have expanded as the market has grown – mainly because we have no scientifically robust framework for assessing this. Given that the balance of gambling expenditures has shifted from 'softer' forms to 'harder' with growth deriving from increases in expenditure rather than participation we should consider with some caution the claims of those who state that gambling-related harm has not been exacerbated since the time of the 2005 Act (or even that it has decreased). It is interesting to note that in 2016, a number of the Budd Report's discarded recommendations are being discussed once more:

- Mandating the NHS to deal with problem gambling as a public health issue;
- Introducing a statutory levy to fund research and treatment into problem gambling if voluntary contributions prove insufficient;
- Conducting research into the effectiveness of different methods of treatment;
- Conducting research into the positive effects of gambling as well as harm.

The increased visibility and availability of gambling does not appear to have precipitated higher levels of youth gambling or gambling-related harm amongst young people. Here too there is a marked deficit in understanding of this issue (as well as dedicated education and treatment services). Despite Budd's recommendation to keep the matter under close scrutiny, youth gambling attracts little attention within Government. Recent research in Great Britain and Australia suggest that it may be time to re-evaluate the effect of TV advertising in particular on the health of children[36].

36 Malgorzata, 2005 pp. 210-211; Bestman et al, 2015

Gambling-related crime has not emerged as a major concern. There is no evidence of any significant black market nor involvement by organized crime within regulated gambling. Less clear is the extent to which gambling benefits from the proceeds of crime (whether through money-laundering, recreational gambling by criminals or individuals turning to crime in order to fund their gambling). Press reports of violence against gambling employees (particularly in the betting shop sector) may be a cause for concern.

In economic terms, the market's development appears underwhelming when compared with expectations. The gambling sectors with the lowest ratios of benefits to costs have increased their shares of expenditure. Tax receipts have grown but at a slower rate than the market – not least because in ignoring Budd's onshore licensing recommendation, HM Treasury denied itself the opportunity of taxing much of the remote sector. The development of resort-casinos – in many jurisdictions the most visible and high profile means of harnessing gambling for economic benefits – has failed to materialize. Both Government and industry appear to have lost all appetite for such schemes despite their apparent success in other parts of the world.

Talking to me in 2016, Sir Alan Budd said: "*Gambling in the UK is a mess – but it's a dull mess. The present state of things is clearly unsatisfactory but there is no sense of national crisis or enthusiasm to take a step forward in the sense of re-examining resort casinos – and it's hard to arouse any excitement."*

The Gambling Review Body never envisaged its report to be the final word on effective regulation of the betting and gaming market in Great Britain. Indeed, the report specifically recommended a review of children and gambling after five years[37] (due in 2006) and a more general review of gambling legislation after ten (2011). Neither has taken place. The lack of interest (from Government and industry) to review the system of regulation may be a missed opportunity; it almost certainly appears to ignore the lesson from history that review is a periodic inevitability. Royal Commissions (or similar bodies) on gambling have been convened in 1932-33, 1949-51, 1978 and 2000-01; and significant gambling legislation has been passed in 1960, 1963, 1968, 1993 and 2005. The Gambling Review Body followed 22 years after the Rothschild Commission – and we now find ourselves 15 years on from Budd.

In 2016, the Government and the Gambling Commission face a long list of challenges on gambling – many of which were nascent or non-existent at the time of Budd. The application of technology to gambling threatens once again to outwit the regulatory framework. The development of mobile gambling was barely glimpsed at the time of Budd (which saw interactive TV as the most likely disruptive technology). Mobile would appear to have the potential to blur the boundaries between gambling in licensed venues and gambling online – something that may pose a fundamental challenge to the licensing framework. Then there is the growing 'grey' area of new products such as social casino, skin betting in e-sports and daily fantasy football and the risk that the pace of technological change may confound a regulatory culture still grounded in compliance with technical specifications.

37 Budd et al, 2001 p.4

The tide of devolution is already starting to erode our centralised regulatory regime. The Scotland Act's inclusion of limited regulatory powers (relating to B2 machines in new betting shops) may well be the thin end of a devolutionary wedge. The public policy debate is polarized between harm prevention and profit protection. The idea of using gambling regulation to achieve the greatest benefits for consumers appears to have been lost along the way. Too often the focus is on the symptoms of regulatory dysfunction rather than the root causes – in particular the regulatory imbalance between licensed venues and remote operations.

The expansion of gambling in Great Britain, which was in part occasioned by the Budd reforms has not led to the disastrous social consequences that some feared it would; nor has it achieved the great expectations of the Review Body and other proponents of change. It seems a matter of historical inevitability that the British Government will at some point feel the need to carry out another systematic review of the role of gambling in British society and the economy. Whether the impulse for that review is a positive one (as with Budd) or a negative one is likely to have a significant impact on the development of the industry.

At such time as the next review is undertaken, it is to be hoped that the Government of the day incorporates an evaluation framework and independent review process in order to assess whether or not policy objectives are being met. To go to the considerable expense and effort of convening a commission – and not to undertake subsequent evaluation appears short-sighted. Without this, the benefits gained from seeking the counsel of wise, independent minds seems destined to erode over time until it becomes apparent that we need to start all over again.

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