



**Unite submission to Department for Digital, Culture,  
Media & Sport: Review of the Gambling Act 2005 Terms of Reference and Call  
for Evidence – March 2021**

## Introduction

This submission is made by Unite, the UK's largest trade union with over one million members across all sectors of the economy, including manufacturing, financial services, transport, food and agriculture, construction, energy and utilities, information technology, service industries, health, local government and the not for profit sector. Unite also organises in the community, enabling those who are not in employment to be part of our union.

Of particular relevance to this submission, Unite represents thousands of members in the Service industries working in hotels, hospitality, casinos, security, cleaning, maintenance and non-food retail. Many of these workers are subjected to low pay, poor conditions and dangerous working conditions and zero hour contracts.

Unite has obtained the views of our members through our lay member committees at national and regional level. Therefore Unite is in a unique position to submit a response to the Department for Digital, Culture, Media & Sport on '*A review of the Gambling Act 2005 Terms of Reference*'.

Unite welcomes this review with particular interest in regulatory framework to prevent harm to those working in the gambling industry, particularly those in land based venues where abuse, violence and harm has been widely reported. Centrally, Unite's response focuses on the operational issues raised by our members who work in gambling industry, however we have also factored in existing concerns with respect to harmful gambling which affect our workers across a range of industries.

## Unite summary

While Unite is alarmed by the impact of harmful gambling on workers and the wider community. Research shows gamblers are more likely to lose their jobs<sup>1</sup>. Over four in five (82%) British adults believe gambling and debt can be a distraction for people in work; 5 million (10%) of working adults have had direct experience of the harmful gambling can cause in the workplace<sup>2</sup>. This highlights the importance of workplace gambling policies which must be supportive rather than punitive. Unite are heavily invested in developing workplace solutions to harmful gambling that raise awareness of the risks associated with gambling and support those dealing with or otherwise affected by gambling addictions.

Beyond the concerns around the impact of gambling in the workplace, through our involvement with Gambling support organisations and ongoing campaigns to address harmful gambling, Unite understands the devastating impact harmful gambling has on physical health and we have noted with concern the research findings which associate gambling with higher mortality rate among women, men and children<sup>3,4</sup>.

We have responded to questions where we have relevant and available evidence, as such the focus of our response concerns the operational issues raised by our members who work in gambling industry, which we discuss under the section relating to **land based gambling**.

In relation to the other areas of this review document, Unite has prepared summarised our concerns as follows;

## Regulating gambling adverts and online protections

Unite questions the efficacy of existing online protections in preventing gambling harms. Ever increasing cases of harmful gambling among adults and children<sup>5</sup> have been further compounded by the coronavirus lockdown<sup>6</sup>, as mobile apps give people unlimited and often unfettered access to the global betting market at the touch of a button.

Unite supports greater controls of online product design. To reduce the harm associated with gambling, Unite calls for urgent Government action to implement a public health approach to gambling regulation, which must include;

- **A ban on gambling advertising and sponsorship** to limit the current overt exposure to gambling which encourages and normalises gambling, particularly among vulnerable young groups such as women, young people and children<sup>7</sup>.

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<sup>1</sup> Reed in Partnership: *Gambling and employment*. [Link](#)

<sup>2</sup> Ibid.

<sup>3</sup> Gambling with lives. 2020 [Link](#)

<sup>4</sup> Gambling with lives: The number of gambling related suicides each year in the UK. 2020 [Link](#)

<sup>5</sup> Gambling Addiction. 2018. [Link](#)

<sup>6</sup> Guardian article: *Number of UK problem gamblers seeking help soars in lockdown*. 16<sup>th</sup> July 2020. [Link](#)

<sup>7</sup> Understanding the Gambling Industry and the Impact of Gambling. [Link](#)

- **An immediate ban on all forms of gambling for under 18s;** 57% of gamblers and 63% of non-gamblers who responded to a Gambling Health Alliance poll confirmed they would support this;
- **A ban on VIP schemes** as these are known to encourage gamblers to bet more;
- **Independent and large scale research** to gather objective data to fully comprehend the societal impact of gambling funded through a new levy on the gambling industry;
- **Greater investment in education and health** care to prevent and treat gambling harms;
- **Restrictions to ensure gambling products** are only be allowed to enter the market once the level of harm they cause has been assessed and found to be below a certain level.
- **A targeted approach to minimise harm in real time** such as allowing people to enable gambling blocks on current accounts or limiting the amount that can be gambled.

According to a Gambling Health Alliance (GHA) poll these initiatives are backed by a majority of gamblers and non-gamblers<sup>8</sup>.

While advertising companies will speak to the economic benefits of gambling advertising where the gambling industry typically spends £1.5 billion per year on advertising, the human and societal cost of harmful gambling on the public purse is £1.2 billion<sup>9</sup>, half of the £3 billion a yearly gambling duty<sup>10</sup>, clearly the economic burden of harmful gambling and the risk to many, far out way to monetary benefits enjoyed by the few.

### The Gambling Commission's powers and resources

For children and young adults gaming is often a gateway to gambling (ref), as this encourages addiction and risk taking behaviour that is associated with gambling. Yet the Gambling Commission's powers do not extend to monitoring and regulating the addictiveness of as well as the exposure to gambling products in video and mobile games.

Unite is concerned that deregulation of the gambling industry has stripped away many of the protections needed to prevent harmful gambling. It is no coincidence that since deregulation harmful gambling has been on the increase. Unite would like this review to consider a legislated reversal to open doors and tighter regulation of new casinos. Workers in the land gambling industry are being severely affected by the lack of enforcement in the sector and often bear the brunt of open doors policy. Unite's concerns with respect to *open doors* are further discussed in the 'land based gambling' section of this response.

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<sup>8</sup> <https://www.rsph.org.uk/about-us/news/overwhelming-public-support-for-action-to-make-gambling-safer.html>

<sup>9</sup> IPPR: *Cards on the table*. 13<sup>th</sup> December 2016. [Link](#)

<sup>10</sup> National Audit Office: *Gambling regulation: problem gambling and protecting vulnerable people*. 28<sup>th</sup> February 2020. [Link](#)

Provided there is a legislated reversal to open doors and tighter regulation of new casinos as mentioned in the sections above, Unite believe that land based venues are better apt at reducing the risks of harm than the largely unregulated and often offshore online gambling.

Unite is questions the effectiveness of the Gambling Commission to monitor and enforce compliance, given its reported annual budget of £19 million to regulate an industry who recorded profits of £11.3 billion (add ref). Unite calls on the Government to increase the resources of the Gambling Commission so it can better regulate land based and online gambling, with the latter outpacing the regulator with its evolving technology<sup>11</sup>.

In addressing harmful gambling, prevention is better than cure, best achieved through education and awareness raising initiatives. Unite commends the Gambling Commission's support of Unite's workplace learning programme; ***Bet You Can Help***. Set up in 2016, the programme funded through the Union Learning Fund (ULF) in partnership with [Beacon Counselling Trust](#), provides workers and trade union officials with first aid training and resources to raise awareness, identify and support those affected by gambling related harm. Through the programme a framework has been developed to help change behaviours and workplace culture that can lead to harmful gambling practices. This sets out a seven-step strategy providing a safe space for members/staff where they can access information, support and be signposted to treatment, providing assistance to both gamblers and those affected by gambling related harm. As part of the programme Unite and several large employers are collectively promoting a [harmful gambling workplace charter](#) which was launched in July 2019. Unite calls for continued support and resources for training and awareness programmes such as this to prevent harmful gambling and harmful gamblers and those affected by it.

### Land based gambling

Deregulation of the gambling industries in the UK has brought about many changes and challenges for land based gambling venues. To counter the rise in online gambling, land based venues have made a number of operational changes which have had a detrimental impact on the wellbeing of those who work in such venues, the biggest operational change has been the open door policy. The two sectors of the gambling industries where Unite receives a high proportion of complaints from are the casino industry and the bookmakers industry.

Following deregulation in the industry, casino operators were able increase their profits by removing membership requirement for casino users, this is commonly known in the industry as 'open doors policy'. This open doors practice has come a cost to workers who have raised legitimate concerns over safety and compliance with gambling regulations.

While some casinos, mainly at the higher value end of the market have retained restricted entry to subscribed members and their guests, the lower value end of the market largely operates an open door policy and it is here where Unite has received the majority of

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<sup>11</sup> National Audit Office

complaints of violence, harassment, abuse and general bad behavior. Allowing people to walk in freely is putting casino employees at risk due to the volatility of customers who have been adversely impacted by the harmful effects of gambling. Additionally casino workers are having to 'police' customers leading to disputes with customers.

In 2018 a Unite member and in the casino sector was a victim of a near fatal stabbing incident at work. In this incident an agitated customer was able to walk in with a knife and randomly attack a worker. It later transpired that the customer had mental health problems and had written notes saying casinos stole money from "*his people*" and staff "*should all die*"<sup>12</sup>. The news of the incident created much anxiety amongst casino staff throughout the Industry. Our members reported concerns that they did not feel safe in their place of work as security staff are not always available.

Unite has heard evidence from casino workers who state that following open doors, they have experienced a sharp rise in incidents of sexual harassment, abuse and even violence on a weekly basis.

In addition to concerns over safety, our members have reported the following issues arising from open door practices;

- **Underage gambling;** casino workers have told Unite they are unable to police customers and conduct age checks. Resultantly underage gamblers only reveal their age when they lose money, exposing workers to disciplinarys and dismissals.
- **Self-excluded;** our members working in the industry have also reported that self-excluded customers are still able to walk-in, unchecked, particularly where they are VIP customers.
- **Alcohol and substance misuse;** workers report that customer are able to walk in intoxicated and often bring their own alcohol to the venues. Additional because of the 24 hour access to gambling venues, on weekend nights (pre-pandemic) there is often a surge of people pouring in from local night clubs, highly inebriated and '*hunting down alcohol*'. Furthermore our members have told Unite there are on drinking restrictions for VIP customers.

Prior to deregulation of the industry, the law protected the player by not allowing alcohol to be served at the gaming tables. Customers could only be served at the bar where they would also have to consume their drink. Whilst this did not guarantee sobriety, it allowed the player to take a break away from the gaming tables and to consider whether they should continue to gamble or stop. It also meant that trained bar staff were able to actively monitor the customer's intoxication level rather than

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<sup>12</sup> Evening Standard: *Croupier knifed in chest by customer at Leicester Square Empire Casino: 'I was two millimetres from death'*. 21 January 2019 [Link](#)

the gaming staff who are largely untrained in this area and must place their focus on the gaming table. **Unite calls for alcohol at gaming venues to be restricted to the bar and for tighter regulation around alcohol consumption at gambling venues to better protect customers and workers.**

- **24 hour gambling;** In addition to the negative impact that working night shifts or continuously changing shift patterns can have on casino workers, keeping casinos open 24 hours per day aggravates harmful gambling and reduces productivity. Before deregulation, casinos would be open between the hours of 2pm and 4 am, later this was extended to 12pm to 6am. With 24 hour gambling, some customers get caught up by the thrill and excitement of gambling and spend an unnatural amount of time in the casino. Our members in the sector report some customer have been known to fall asleep next to the slot machines.

Unite has heard from workplace representatives working in casinos who have raised concerns over 24 hour licensing. They have told us that from 4am there is no gaming activity, only drinking, which is harmful to the gambler and also for staff, particularly women staff members who feel unsafe leaving work to travel home due to experiences of harassment and abuse at work and also from witnessing or hearing about colleagues who have been attacked or mugged by customers after work. Mandatory open and shut hours would allow for a proper rest period, giving customers and casino workers an opportunity to rest in the same way that pubs are not run 24 hours per day. **In light of this Unite is calling for an end to 24 hour licensing in the casinos.**

- **Know-Your-Customer (KYC) requirements;** aside from the potential dangers faced by casino employees, another issue related to open door policy is the *Know-Your-Customer* (KYC) requirements and the due diligence associated with making all the necessary checks. This places significant pressures on casino employees who are often faced with disciplinaries and dismissal when operators are fined by the Gambling Commission for failure to comply.
- **Use of smart phones in land based gambling;** in some casinos customers are now able to load up their credit/debit card removing the need to get up from the gaming table to use the cash machine. This enables continued gambling and poor decision making and can be detrimental to the customer, fueling harmful gambling. Walking away from the table provides the customer with an opportunity to temporarily remove him/herself from the euphoria of gambling and consider what they are doing, giving the customer a chance to stop playing if they wish to do so.
- **Reduced types of gaming licenses and redesigned job roles;** before deregulation there was a licence for a dealer, an inspector, a manager, and a director. This has now

been reduced to two licenses, resulting in redesigned job roles whereby inspectors are now doing the role of managers and dealers and also functioning as inspectors. Instead of being a temporary learning opportunity, some casino operators are exploiting their staff for several years with little prospective of job promotion or progression. This also exposes staff taking on these roles to risks beyond their job description, particularly where corporate responsibility and health & safety compliance issues are concerned. As a result of these additional work pressures, many casino employees suffer from stress.

- **Return of some losses;** in many casinos, gamblers are given a percentage of their losses back in '*non-negotiable chips*'. These are tokens which cannot be cashed in and can only be played in the issuing venue. If a customer wins a game using these chips they are paid in '*proper cash chips*' which they can cash in if they wish. Casino workers are concerned that this is encouraging the customer to play, counter to regulations, and raises further concerns relating to addiction to gambling. **A more ethical option would be to give the customers the money they have earned with their loyalty cards when they leave or vouchers which can be traded after 24 hours.** That way the customers won't leave empty handed and the industry is shown to be doing the right thing in helping that person.

### Additional remarks

It is inevitable that sometimes change is a necessary part of life. However, not every step forward is beneficial, especially at the cost of someone's gambling addiction, or someone's bankruptcy, someone's family and even someone's life. Whilst the gambling industry allows the government to raise much-needed funds from taxation, this comes at a heavy cost. If the gambling industry continues in this deregulated model, whereby operators have the liberty to advertise on TV and induce vulnerable people to gamble, particularly on the internet which is much harder to monitor, then perhaps we need to consider reversing the deregulated model, or work in a different direction with a better controlled environment designed to be proactive and considerate. Ultimately, it is important to decide which legacy we leave for the next generation and whether they will have to fix something which we should have not broken in the first place. Provided there is a legislated reversal to open doors and tighter regulation of new casinos as mentioned in the sections above, Unite believe that land based venues are better able to reduce the risks of harmful gambling than the largely unregulated and often offshore online gambling.

However, while online gambling in the UK has grown by 8.1% in 2020, the land based gambling industry has seen a drop in revenues by 0.6% year-on-year to March 2020 with decreases in the number of land-based casinos in by 6.4% in 2020 compared to 2019 figures, as well as a 7.7% decrease in the number of betting shops, and a decrease of 5.7% in non-remote bingo

in the same period<sup>13</sup>. The shift to online gambling has impacted employment rates within the land based gambling industry, as of September 2019 there were a recorded 87,294 people employed in the land based gambling, down from 122,052 in 2010<sup>14</sup> a 28.4% decrease in the number of people working in land based casinos (this includes workers in betting shops, bingo and casino venues, arcades, lotteries and gaming machine technical workers), the only sector within the gambling industry which has seen an increase in its workforce is the remote/online sector with 9,828 employees in March 2019 up from 7,518 in 2010<sup>15</sup>. While online gambling has created jobs for those in digital careers, there have been considerable numbers of job losses in the land based part of the industry.

Job quality and working conditions in the land based gambling sector is of particular concern to Unite. Given the reports of violence, harassment and abuse towards casino workers mentioned in the sections above, land based venues are in desperate need of trade union collective bargaining agreements to establish safe working conditions and union workplace health and safety representatives to monitor minimum safety standards. Additionally there is a growing body of international research that indicates that people working in the gambling industry are at an increased risk of experiencing harmful gambling, and Unite is concerned about over-exposure to gambling for shift workers. Since 2016 Unite has been developing responses to identify and counter the consequences of harmful gambling in the sector. Unite has developed a ***Harmful Gambling Workplace Charter*** (appended). The ***Charter*** provides an evidence based approach to supporting workers, offering practical ways in which employers and trade unions can commit to promoting the health and wellbeing of their workers experiencing gambling related harms. It seeks to help reduce sickness and absence and support those who want or need to change their relationship with gambling. Through a framework for action to employers and trade unions build good practice in health and work in their organisation. Included within the Charter is the employers commitment to support and train workers (in consultation with trade unions) to prevent and reduce harmful gambling.

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<sup>13</sup> HR News: *Is Online Gambling causing a loss in Gambling Jobs?* 15<sup>th</sup> February 2021. [Link](#)

<sup>14</sup> Statista: *Number of employees in the gambling industry in the United Kingdom from 2009 to 2019, by sector.* [Link](#)

<sup>15</sup> Ibid.



**Appendix**

**A CHARTER TO REDUCE  
GAMBLING RELATED HARMS IN  
THE WORKPLACE**

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“Gambling Related Harms” goes wider than the impact on the individual and covers the adverse impacts from gambling on the Health and Wellbeing of individuals, families, communities and society.

We would encourage employers and trade unions to support this charter and work collaboratively to help address gambling related harms at workplace level.”

**Jim Mowatt**

*Director of Education (Unite the Union)*

This **Workplace Charter** provides a framework for action to help employers and trade unions build good practice in health and work in their organisation. The charter supports all types of employers, large and small, from public, private and voluntary sectors.

Harmful gambling can be the causes of, and contributors to, short and long term ill health for a considerable proportion of people of working age. For example, it is estimated that there are in the region of 400,000 problem gamblers in the UK and with many times that number experiencing gambling-related harms.

This charter offers practical, evidence based ways in which employers and trade unions can commit to



promoting the health and wellbeing of their workers experiencing gambling related harms. It endeavours to help reduce sickness and absence and support those who want or need to change their relationship with gambling.

Employees are the lifeblood of any organisation. Their health and wellbeing are central to its sustainability. An organisation that supports its employees to make healthier choices and overcome problems with their gambling behaviour is more likely to prosper, through higher productivity, improved staff retention and improved performance.

The business case for supporting employees to make healthier choices relative to harmful gambling is compelling. A healthier workforce has a positive impact on the productivity and sustainability of organisations. It also benefits society as a whole, by reducing health and social care costs, and the human costs of ill-health. Problematic gambling makes a considerable contribution to workplace absence. This has a significant cost to business and the economy. The economic burden of problem gambling is substantial, with estimates placing the annual cost in the UK to be over £1.2 billion.

Problem gamblers are:

- **2.69 times** more likely to have visited their GP in the last 12 months with a mental health issue
- **8.54 times** more likely to be accessing mental health services
- **5.53 times** more likely to have been a hospital inpatient within the last 3 months

- **4.4 times** more likely to be in prison **than the general population** (IPPR 2016).

Tackling harmful gambling is an issue that employers and trade unions can work on collaboratively and such combined efforts underpin the approach adopted by this agreement.

## CHARTER AGREEMENT

### Step 1: We will make a commitment

- We confirm that there will be a clear commitment from senior management that policies on gambling are central to the organisation's approach to health and wellbeing. This commitment is stated in a form that is visible and understandable to all employees.

### Step 2: We will build our approach

- We confirm that the senior management team will understand and act on all its duty of care and legal obligations concerning gambling related harms and risk management in the workplace.
- The senior management team will communicate, consult and include trade union representatives/employees at all levels in building that approach.

### Step 3: We will promote a positive culture

- We will ensure there will be effective management standards in place in order that employees feel supported and valued whilst suffering from or at risk of suffering from gambling-related harms.

### Step 4: We will support and train

We confirm that the leadership of the organisation will ensure that information is freely shared, that we will consult with trade unions and that every employee knows how to access support and who to discuss their needs with, in relation to gambling related harms.

- Line managers and trade union representatives will receive training that helps them understand and signpost individuals to sources of support in regard to gambling related harms, with key members trained in the **"BET YOU CAN HELP PROGRAMME"**.

### Step 5: We will provide the right support

- We confirm that managers and trade union representatives will be trained and confident in recognising gambling related harms and how to hold sensitive, confidential conversations and represent members.

### Step 6: We will help people to recover

- We confirm that employees who experience gambling-related harms and have to take time off work are given appropriate support to help them return when ready and adjustments will be made for their successful return to work through regular contact with their manager in consultation with trade union representatives.

### Step 7: We will seek parity and handle issues with sensitivity

- Ensure problematic gambling issues are given equal parity to policies regarding drugs and alcohol.
- Workers are treated with sensitivity and are handled appropriately when concerns are raised either informally or formally through grievance and disciplinary procedures.

**Signed** .....

**Position** ..... (on behalf of the employer)

**Signed** .....

**Position** ..... (on behalf of the trade union)





Total gross gambling yield of the gambling industry in Great Britain is £14.3 Billion



Less than 1% of the adult population contribute an astonishing 25% of the profits of the gambling industry



The gambling industry spends £1.5 Billion per year on advertising



The cost of harmful gambling on the public purse is £1.2 Billion



Almost 1 in 5 adults gamble online in the UK. 50% use laptops 39% mobile 19% tablets



32% is the market share of the "remote" or online betting, bingo and casino sector



The rate of problem gambling among 11-16 year old children is twice as high as for adults- for boys alone it is 3 times as high



While over 85% of UK businesses have drink & drugs at work policies, less than 5% have a gambling at work policy



Esports betting coverage & potential is as big as real-life sports. A multi-billion \$ industry with an anticipated global revenue of \$12billion USD



98,174 Total number of employees in the gambling industry in Great Britain (Sept 2019)



Harmful gamblers are 15 times more likely to take their own life, equal to approximately 550 deaths by gambling-related suicide in the UK



60% of the industries profits are acquired from 5% of players who are deemed at risk or problematic



Only 1% of women affected by gambling related harms seeks support from the National Gambling Helpline despite a 35% increase in calls from 2014 to 2019



The National Helpline receives about 12,000 calls from people accessing treatment. (Only a fraction of the 700,000 who are identified as at risk of being harmful gamblers)



The activities of harmful gamblers impact upon 6 - 10 other people. Estimating that up to 4.3 million people are adversely affected (CAB)

