

GAMBLING COMMISSION

23 February 2015

To: Federation of Racecourse Bookmakers, National Association of Bookmakers, Association of Racecourse Bookmakers, Rails Bookmakers Association

On-course age verification controls

One of the key objectives set out in the Gambling Act 2005 (“the Act”) is to protect ‘*children and other vulnerable persons from being harmed or exploited by gambling.*’¹

Betting can only continue to enjoy its status as a mainstream leisure activity if it is conducted and enjoyed solely by adults. The importance society places on preventing underage gambling is reflected in the fact that it is a criminal offence under the Act for a bookmaker to permit a child or young person to place a bet.

As part of the Commission’s statutory responsibility to enforce these requirements, we wrote to on-course trade associations in June 2014 to stress that they must have robust age-verification controls in place on tracks. This followed the extremely poor results from an underage test purchasing exercise conducted at Ascot racecourse, where every one of the twenty bookmakers tested failed to challenge the underage volunteers.

Since June 2014, trade associations, coordinated by the Federation of Racecourse Bookmakers (“FRB”), have taken welcome steps to raise awareness of this issue with their members.

In addition, the FRB commissioned a major programme of test purchases at a number of tracks in December and January. The results are alarming. Over the 200 tests conducted, only 10 resulted in the tester being challenged for identification in line with a ‘Think 21’ approach.

Following the Ascot underage test purchase exercise in 2014, we confirmed that we would undertake further such exercises to monitor improvements. On 24 January 2015, we supported Cheltenham Borough Council in conducting testing of licensees at Cheltenham Racecourse. Of the 21 tests conducted, 9 resulted in a failure to challenge the volunteers, who were aged 16 and 17. The results put the on-course sector well below the level of performance of other age restricted sectors both within the gambling industry and elsewhere².

The Commission’s concern about these serious shortcomings has been compounded by the adverse reaction from some operators in the sector, which tends to suggest a reluctance to accept and deal with the problem. We know that is not the reaction of the majority, nor of those who represent them. It is first and foremost in the on-course industry’s own interests to demonstrate a determination to make rapid and significant improvement if it is not to undermine the very light-touch regime it currently enjoys. Furthermore it is in the interests of individual operators if they are to avoid more formal enforcement action.

¹ s.1(c) Gambling Act 2005

² Performance for comparable challenges for off-course bookmakers average 85% for the largest operators and 75% for smaller independents



We will be making this correspondence available to the Racecourse Association and AGT as interested parties who share the Commission's objective of raising compliance standards on tracks. Whilst we are again asking racecourses and trade associations to help communicate the need to make significant improvements in this area, ultimate responsibility for compliance rests with the individual betting licensees. To support members in these efforts, we understand the FRB will be commissioning a further 'Think 21' testing exercise using Serve Legal, and will be contacting those operators subject to the earlier tests. In addition, the Commission has already engaged with further local authorities who have expressed a willingness to undertake test purchase exercises at racecourses.

From a combination of further 'Think 21' and underage testing, the Commission will assess whether the required improvements in on-course controls are being evidenced.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'MH', with a long horizontal stroke extending to the right.

Matthew Hill
Director, Regulatory Risk & Analysis