

# EXPLORING ACCESS TO CASH WITHIN GAMBLING PREMISES IN BRITAIN

## Summary:

There is no ‘one-size-fits-all’ solution when it comes to helping individuals wishing to control their gambling spend. Some may find cash a useful budgeting tool, others prefer to use bank gambling blocks which are only available for card payments, and some may use a combination of strategies to limit or halt their gambling expenditure.

As such, it is important that we build the evidence base around the use and ease of access to different payment mechanisms within gambling contexts. This short paper focuses on the role of cash in gambling. We first provide a short overview of academic and grey literature on the relationship between cash and the prevention of gambling harms, and then introduce new analysis which looks at access to cash within and near to gambling premises in Britain (from February 2018 to August 2020). We find that:

- Four out of five (83%) gambling premises in Britain have an ATM within a two-minute walk: 49% of gambling premises have an ATM within the same postcode, while a further 34% have one within a 100m radius.
- From 2018-2020, there was an ATM at approximately one in every ten gambling premises (~1,000 ATMs across ~10,000 gambling premises).
- Prior to the coronavirus pandemic, the rate of decline in the number of ATMs within gambling premises had been slower than that for ATMs in venues such as bank branches and Post Offices. Since the pandemic started, however, the rate of decline has been steeper.
- While gambling premises tend to be located in relatively deprived areas, those in the *most* deprived areas appear more likely to have an ATM.
- Over half (53%) of ATMs in gambling premises were at bingo venues in August 2020, while 20% were at amusement arcades, 17% at casinos and 11% at other types of gambling venue.

The relative ease with which consumers can access cash near to – and, to a lesser extent, within – gambling premises potentially poses questions for various strategies to help people manage their gambling spend. For example, does this ease of access to cash provide gamblers with a sufficient break from play? Easy access to cash also may lead to challenges for interventions which allow individuals to restrict access to their own money, like bank gambling blocks which work only to prevent card payments on gambling.

Financial services firms should therefore use the transaction data available to them to further understand whether some customers (in particular, those previously known to spend large amounts at land-based gambling venues) are withdrawing more cash (or using any other type of emerging payment mechanism more) since turning on a gambling block on their debit card. Where there is evidence that this happens, firms may consider proactively offering customers the ability to further control or limit cash withdrawals. While some banks allow customers to do this if they ask for it, it is not an option that is routinely offered. Firms might also consider how to better signpost customers to other forms of self-exclusion from gambling. Further research on the effectiveness of interventions in this area is needed, however, with payment data from both banks and gambling operators potentially playing an important role.

## 1. Introduction

**Those looking to control their gambling spend may use a variety of strategies to do so. One common type of strategy involves using financial mechanisms to stop or reduce access to money for gambling (Rodda *et al*, 2018). Despite its use declining in recent years in Britain, cash remains a key payment method within land-based gambling venues and can have important implications for gamblers' strategies to manage their money. As such, this paper brings together existing and new evidence on the role of cash in reducing gambling harms.**

In an analysis of gamblers' strategies to control or limit gambling behaviours, Rodda *et al* (2018) identify that one common strategy is 'financial avoidance', which is where individuals use financial mechanisms to prevent or limit their access to money for gambling. This might include asking family members, friends or support workers to help them control their finances, monitoring their gambling spend, or removing access to money – for example, by cutting up or destroying cards or avoiding carrying cash.

As Rodda *et al* point out, many of these strategies change as technology evolves. Previously, in the past, some people have resorted to measures such as freezing their bank card in a block of ice and waiting for it to defrost before being able to place a bet (see, for example, Gamban, no date). More recently, this has been formalised with the creation of bank card gambling blocks, which enable bank customers to prevent themselves using their debit card to gamble, with customers commonly facing a 'cooling-off period' of 48-72 hours before being able to gamble again. This kind of 'positive friction' has been widely welcomed by gambling treatment professionals and those with lived experience of harmful gambling (Evans *et al*, 2020). Indeed, such blocks are now offered by around 10 banks in the UK (GamCare, no date) – potentially covering over 90% of the UK current account market.<sup>1</sup>

Despite technological advances in both payment methods and online gambling, more 'traditional' aspects of both remain important. Land-based gambling, for example, is still cited as an issue by nearly half (46%) of those who come to GamCare for support with their gambling (GamCare, 2021b). Within land-based venues, cash continues to be a key payment method, especially among lower income households – a group who tend to experience higher risk factors for problem gambling (Slutske *et al*, 2019).

As we go on to discuss in section 3 – access to cash has significant implications for those trying to control their gambling spend. The relationship between gambling premises and cash machines is also highlighted by the voices of those with lived experience of harmful gambling in their response to the Department for Culture, Media and Sport's (DCMS) consultation on the Gambling Act review:

"Betting shops are more prominent in deprived areas. This is where you also find ATM machines charge a fee for money. It just adds to deprivation."

"My own experience, especially of large towns & cities (Glasgow, Stratford East London, Ilford Essex, Newcastle, Sheffield, I could name many more) is that High Street bookmakers are 'clustered' & purposely situated next door or within 150 metres of a cash machine." (GamLEARN and GamFam, 2021)

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In this report, we first provide a short overview of policy on payment mechanisms for gambling in Britain and then review key academic and grey literature on the relationship between cash and the prevention of gambling harms. We conclude by introducing new analysis which looks at access to

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<sup>1</sup> Based on analyses from Evans *et al*, 2020.

cash within and near to gambling premises in Britain. This addresses a research gap around cash access that has been noted as a limitation of previous studies; for example, a study examining the impact of banning the use of credit cards for gambling in Britain (Gambling Research Exchange Ontario, 2020).

To do so, we predominantly use data on ATM locations supplied by [LINK](#) (the network to which every ATM in the UK is connected). Data for four time periods were used, giving ATM locations on the last working day of: February 2018, February 2019, February 2020 and August 2020. We identify those ATMs located outside of or within gambling premises based on the first line of their address, using an additional dataset of the names and locations of gambling premises licences in Britain provided by the Gambling Commission. We also conducted spatial analyses in which Geographic Information Systems (GIS) were used to measure the distance between each gambling premises and the nearest ATM. For more information on the analyses conducted, please see the Appendix. The geographical focus of the research is on Britain; however, where relevant, we also draw on research from across the world.

## 2. What are the current rules on payment methods for gambling in Britain?

The Gambling Commission describes its approach to payment methods as “supportive of innovation, as long as the way in which it is done is consistent with licensing objectives” (Gambling Commission, 2021a). It says therefore that any new innovations in the way consumers pay should be done in a way that mitigates or minimises the risk of gambling-related harms.

It therefore requires operators to ensure that customers take a break before they access and use new funds, due to the risk of overspending if funds are too accessible. In relation to cash withdrawals, this means that “any ATM is located in a place that requires customers to cease gambling and leave the gambling product in order to use it.”

### When can consumers use cash or cards to pay for gambling activities?

Payment method	Land-based gambling		Remote (online) gambling
	Gaming machines	Other gambling	
Credit card	Prohibited	Prohibited*	Prohibited
Debit card**	Prohibited	Allowed	Allowed
Cash	Allowed	Allowed	Not directly possible**

**Notes:** \*The Gambling Commission [introduced a ban](#) on gambling on credit cards that came into effect in April 2020 – it applies to all online and offline gambling, with the exception of non-remote lotteries. \*\*Contactless mobile phone payment systems such as Apple Pay or Android Pay are regarded the same as debit cards. \*\*\*While cash cannot be used directly to pay for online gambling, there are now services which allow customers to use cash offline to purchase a prepaid card or voucher code that can be redeemed online.

The Gambling Commission also currently imposes a ban on the use of card payments for gaming machines, as made law by [The Gaming Machine \(Circumstances of Use\) Regulations 2007](#). The Government may reverse some or all of this ban in future to enable cashless payments as cash use declines, though it has also committed to protecting access to cash for the foreseeable future.

As of 14<sup>th</sup> April 2020, gambling on credit cards has been banned in Britain – both for online and land-based gambling (with the exception of offline lotteries). This move followed research which showed that a high proportion (22%) of online gamblers using credit cards were classed as problem gamblers (Gambling Commission, 2020b). E-wallets also fall within the scope of the ban, in that a gambling operator must be able to prove that any funds from an e-wallet used for gambling did not originate from a credit card.

### 3. Why does cash matter in relation to gambling?

First, it should be noted that there is no ‘one-size-fits-all’ solution when it comes to helping individuals control their gambling spend. What works for some people might not work for others. This is true in relation to payment methods, where some individuals prefer to manage their spending using cash, while others prefer digital payment methods.

#### **The potential benefits of cash for controlling gambling spend**

A survey of land-based gamblers in the UK, conducted on behalf of the Gambling Commission, found that people were more likely to associate cash with feelings of control over their spending and cashless payments with less control (2CV, 2021). For example, 89% of those who had a preference for using cash for gambling felt “in control of [their] spending” using cash and just 24% said it was “easy to end up spending more money than [they] intended to”. The respective figures for those who preferred cashless payments, meanwhile, were 74% and 81% when asked about their use of card and mobile payments, indicating that while many still feel in control of their spending when using cashless payments, they do acknowledge that it is very easy to spend more than planned.

This perception that cashless payments lead to increasing spending has previously been supported by consumer psychology literature. Paying with cash involves different internal processes to paying with non-cash methods (Parke *et al*, 2016). For example, non-cash payment methods often mean a more passive payment process, without the need to count out cash or pay attention to how much is being spent. On the other hand, the physical and tangible nature of cash can reinforce the true value of the transaction and increase ‘the ‘pain of paying’ (Parke *et al*, 2016).

With this in mind, some gamblers see cash as a way of limiting their expenditure on gambling, choosing only to carry a set amount of cash and to leave their payment card at home. Indeed, the national charity GamCare recommends such a strategy in its advice on money management.

The risks of overspending on card may however be diminishing over time, as consumers get more used to paying in this way, or as technology evolves to give people better digital ways of keeping track of their money (Liu & Dewitte, 2021). For example, while previously a consumer may have had to check their bank balance at an ATM, now they may be able to check it more easily at any time using a banking app.

#### **The potential risks of cash for controlling gambling spend**

There are a number of arguments that easy access to cash can be problematic for those working to control their gambling behaviour. The first of these relates to the idea that the easier it is for someone to access money (via cash or other mediums) without taking a break from gambling, the more likely they are to spend more than they can afford. The second is that the informal and anonymous nature of cash means that it can make other strategies to self-exclude from gambling (such as bank gambling blocks) less effective. A third issue meanwhile is that cash may affect gambling operator’s ability to undertake affordability checks in land-based venues. Below we describe the literature available on each of these issues in more detail.

### A. Availability and accessibility of cash is a risk factor for overspending, particularly for people experiencing gambling disorder

Easy access to additional funds in gambling premises can be a risk factor for harmful gambling (Gambling Commission, no date). Players often gamble more money than planned, as they make impulsive decisions that can override how much they had initially committed to spend (Parke *et al*, 2016). This means that easy access to ATMs may lead to increased gambling spend, especially for gaming machines given that card payments are not currently an option for these in Britain.

An Australian study found that ‘problem gamblers’ were more likely to use ATMs located in gambling premises (60%) compared with ‘regular’ gamblers (25%), ‘recreational’ gamblers (who gambled less often than weekly) (12.7%) and non-gamblers (5.2%) and were more likely to spend their withdrawals within the gambling venues (90%) compared to ‘recreational’ gamblers (70%) (McMillen *et al*, 2004). In addition, ‘problem gamblers’ were more likely make larger withdrawals (60% withdrawing more than \$100 on their last occasion) compared to all other gambler groups. Importantly the most common reason given for using an ATM within a gambling venue was access (22%), although 19% noted security concerns (worried about carrying the money in their wallet).

Similar findings were obtained in a separate Australian study, which showed that more than half of ‘at-risk gamblers’ (59%) accessed an ATM during a gambling session and of these 9.2% were ‘problem gamblers’ (Stevens, 2017). This compared to only 1% of those who did not access an ATM being a ‘problem gambler’. The study also found a statistically significant association between gambling severity and the number of times a gambler accessed an ATM within a gambling session, with likelihood of problem gambling increasing the more times the gambler accessed an ATM.

Based on a review of the literature, the (Canadian) Responsible Gambling Council concluded that provision of ATMs inside gambling venues can increase the amount of time and money spent during a session and can lead to more impulsive gambling, especially for ‘problem gamblers’ (The Responsible Gambling Council, 2021). Parke *et al* (2016) therefore highlight that if access to funds within venues were restricted, people would need to pre-plan their spending or access an ATM outside of the venue, which could provide a break in play or ‘cooling-off period’ to give people time to assess their spend. They recommended that meaningful consideration should be given to restricting access to funds within gambling venues.

Given that using ATMs within gambling venues can be a risk factor for harmful gambling, it is unsurprising that some evidence has shown removing ATMs from venues can lead to a reduction in gambling spend. Thomas *et al* (2013) conducted an evaluation in Victoria, Australia after legislation was introduced in 2012 which restricted where ATMs could be located. Once introduced, ATMs were no longer allowed within gambling venues and the authors found that Electronic Gaming Machine (EGM) revenue in Victoria decreased by 7%. The evaluation also found that higher risk gamblers spent less time and money on EGMs and reported increased self-control over their spending.

However, other evidence questions the impact of removing ATMs from gambling premises (Parke *et al*, 2016; Responsible Gambling Council, 2021). A study conducted in Canada by Harrigan, MacLaren and Dixon (2010), for example, interviewed gamblers at two venues, one where the ATM had been removed from the slots floor; the other where the ATM was not removed. On the first day that the ATM was removed, under a quarter (24%) of those in that venue reported making unplanned cash withdrawals. This compared with an unplanned withdrawal rate of 43% among those at the venue where the ATM had not been removed – a rate almost twice as high. However, after 30 days there was no significant difference in reports of ATM use and exceeding spending limits between the two

groups<sup>2</sup>. The authors argued that players may learn to adjust and access cash from elsewhere when it is made less accessible.

#### B. Cash as a ‘workaround’ to card-based controls

Once activated, bank gambling blocks should stop the account holder using their bank card to gamble; they can, however, still withdraw cash from an ATM to gamble. The same is true of the Gambling Commission’s credit card ban: while gamblers can no longer pay for gambling with a credit card, they may be able to withdraw money as cash and use this for the purposes of gambling. This has been raised as an issue by those with lived experience of gambling harms:

“[Bank gambling blocks have] been a great move and unsurprisingly the traditional high street banks have generally followed suit. However, with all providers I can however still take out lots of cash from an ATM daily. I’ve asked all my financial service providers to reduce my ATM limit and they all said it’s not possible. If I’m able to increase my ATM limit with a quick phone call, surely the technology is in place to also reduce my withdrawal limit?” (MMHPI, 2022)

For these reasons, gambling treatment and support organisations commonly recommend that people self-exclude from gambling in multiple different ways: using bank gambling blocks, technological blocks to block access to gambling websites (such as Gamban), and operator-based self-exclusion schemes (such as MOSES and GamStop) (see, for example, Gamban, no date).

A survey of gambling block users by one bank found that around 15 per cent of users had gambled in another way, despite having their block enabled (Evans *et al*, 2020). It was unclear though whether these were people who had hoped to stop gambling entirely or not, and whether it was cash (or another payment method) that was being used as a workaround. A separate small-scale survey in the same report found that 15 of 22 gambling block users said they would be likely to “set a limit on the amount of cash [they] can take out from an ATM” if offered by their bank to help them control their gambling.<sup>3</sup> As a proportion, this was higher than among those who had never used a gambling block, suggesting that those seeking to control their gambling through self-exclusion may see greater value in setting a limit on cash withdrawals for themselves.

Despite this, in our previous research on bank gambling blocks, we found that some people viewed cash as less of an issue when compared with the ease of gambling via card (Evans *et al*, 2020). One participant, for example, said:

“I could go to an ATM and go other places, but it’s [a gambling block on a bank card] still, it’s putting up a barrier, it’s putting up a massive block, like I can’t just sit on my bed and gamble on a laptop, I can’t sit in my room on my phone, I can’t be on my electronic device, I’ve physically got to go somewhere and that is, that’s putting something in place, putting like a barrier to gambling up.”

Analysis of a sample of customers of UK challenger bank Monzo who were ‘above-average gamblers’ and had activated Monzo’s gambling block feature found small but statistically non-significant<sup>4</sup> increases in ATM withdrawal patterns in the week immediately following block activation (The Behavioural Insights Team, 2021). Further investigation may be required to understand whether

<sup>2</sup> The participants were specifically asked to estimate how often in the previous 30 days they had gambled, how much they had spent gambling, whether they set expenditure limits and kept them, and whether they had ever used the ATMs inside the slots facility.

<sup>3</sup> This was, it should be noted, lower than the level of support for options such as receiving a regular reminder from the bank about how much they had spent on gambling (19/22) and talking to someone at the bank who specialises in reducing gambling harms (18/22).

<sup>4</sup> Based on significance testing that we conducted independently.



different patterns are observed over longer time-periods or based on whether the customer predominantly gambled online or at land-based venues prior to enabling the block. It is possible also that the customers of an app-based bank such as Monzo are not representative of the wider population of UK land-based gamblers. Bank transaction data of course reveals little about what an individual chooses to spend cash on – highlighting the value of triangulating between different data sources (banks, gambling operators and self-report) when conducting research in this area.

The use of cash as a potential workaround was also explored in research for the Gambling Commission following its ban on the use of credit cards for gambling, with mixed results obtained (Gambling Commission, 2021b). No spikes in ATM activity were reported by one bank following the credit card ban; however, the ban's introduction in April 2022 during a period of national coronavirus lockdown may have affected results. Qualitative interviews with gamblers meanwhile did find some evidence of individuals withdrawing cash from credit cards to then use for the purposes of gambling.

### C. Limited ability to enforce affordability checks

GamFam and GamLEARN's response to the consultation on the Gambling Act Review also highlights issues around how to enforce affordability checks in land-based venues (2021):

“There was a strong theme of concern that gambling in land-based venues was not monitored at all, so that people are allowed to bet and lose considerable amounts of money and this is not picked up in any way. Any oversight and actions require the vigilance and commitment of individual bookmakers, who still do not have a view of a gambler's overall spending or whether they can afford it.

This total lack of oversight and integration with online gambling monitoring and measures presents a major risk for land-based venues to become a serious loophole for allowing people with gambling disorder to gamble. Therefore, there was widespread support for a range of safeguards which included allowing only cashless betting and/or the introduction of some form of gambling ID card to allow a whole range of affordability checks and monitoring of visits and spend.”

Here, the argument is that digital payment methods (or the use of ID) make it easier to obtain a 'single customer view' of an individual's gambling spend – meaning that it is easier for gambling operators to step-in to offer support or restrict access for those engaged in risky gambling behaviours. An example of this comes from New South Wales in Australia where the government has proposed a shift to cashless gambling and the introduction of a mandatory 'Oyster card'-style payment card for gambling (McGuire, 2021). This has largely been welcomed by gambling researchers; however, they caution that much depends on how such a system is designed, saying that if an easy 'workaround' such as cash still exists then it risks 'undermining' any harm minimisation measures (Gainsbury, 2021).

In the UK, there appears to be some support for a cashless system (for example, via an app) which enables players to keep track of their own gambling and potentially which allows gambling operators to step in where they can see evidence of possible harm. A survey of land-based gamblers found that two-thirds (67%) of moderate or problem gamblers were open to the idea of paying for gambling through a cashless payment method – with 29% being happy for this information to be shared with gambling companies (2CV, 2021). When including non-problem and low-risk gamblers, these figures fall to 55% and 22% respectively.<sup>5</sup> Regardless of levels of support for the idea, as Beckett *et al* (2020)

<sup>5</sup> The researchers note that there is a “high overlap between age and problem gambling” in their dataset, with younger respondents and problem gamblers being more supportive of cashless payments and data-sharing.

point out, gambling venue staff are likely to need enhanced skill-based training if they are being expected to approach and offer support to those identified as experiencing harm from gambling.

#### 4. The relationship between ATMs and gambling premises in Britain

In this section, we present new analysis of data supplied by LINK on ATMs in Britain. We find that there were at least 1,105 ATMs based within or at gambling premises in Britain at the end of February 2018, representing 1.7% of the 65,360 ATMs in the country at the time (as shown in Figure 1). The number of ATMs within gambling premises fell to 1,078 by February 2019, 1,023 by February 2020 and 856 by August 2020. However, because ATMs more generally were also decreasing in number over this period, the percentage of all ATMs that were based within gambling premises remained largely unchanged. Over this period, there was one ATM (at a gambling venue) for approximately every 10 gambling premises. We also find that throughout this period at least 95% of the ATMs that were based at gambling premises were located inside the premises, rather than outside on the street.

As Figure 2 shows, ATMs in gambling premises had actually been declining in number at a slower pace than ATMs in banks and post offices prior to the coronavirus pandemic, but quicker than those in supermarkets. By the second half of 2020, however, those in gambling premises had experienced the biggest percentage decrease relative to their 2018 number (while the pace in decline of ATMs at banks slowed). Relative to their February 2018 level, ATMs at gambling premises decreased by 7 per cent by February 2020<sup>6</sup> and by 23 per cent as of August 2020, compared with 10 and 12 per cent decreases respectively in the number at banks. This is likely to reflect the effect of differing lockdown restrictions on different sectors of the economy. The relatively slow pace of change prior to the pandemic, however, suggests that ATMs at gambling premises may have been more commercially viable than those at other venues, which in turn suggests that those using gambling venues were particularly likely to be more regular users of cash.

**Fig. 1 – Number and percentage of ATMs located in/at gambling premises, Feb 2018 – Aug 2020**

	Feb 18	Feb 19	Feb 20	Aug 20
No. of ATMs in/at gambling premises	1,105	1,078	1,023	856
No. of ATMs overall	65,360	60,697	58,042	53,515
% of all ATMs in/at gambling premises	1.7%	1.8%	1.8%	1.6%
No. of gambling premises	11,069	10,783	10,098	-
Gambling premises per ATM within gambling premises	10.0	10.0	9.9	-

**Notes:** analysis of LINK data, for ATMs within Great Britain. ATM data obtained for the final working day of each month. ATMs included whether internal or external, free-to-use or pay-to-use. Data on number of gambling premises comes from the Gambling Commission's 'Industry statistics' (November 2020), covering March of each year.

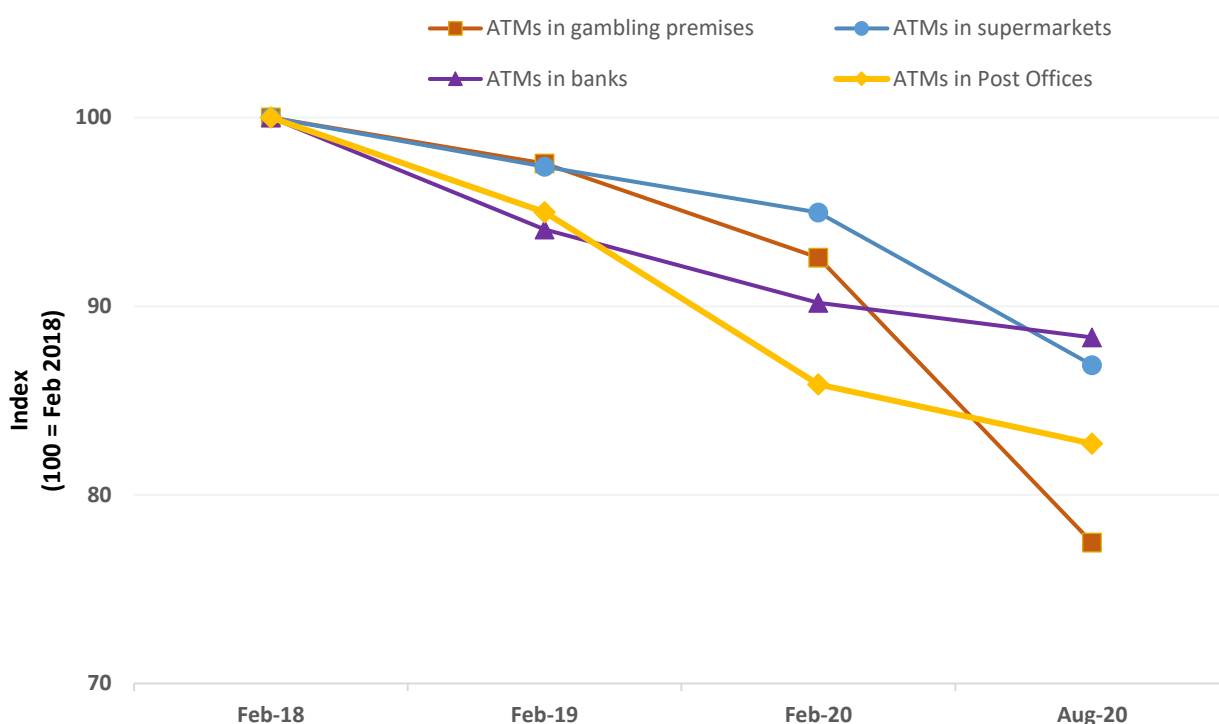
They therefore say that it is hard to determine which of these two factors (age or problem gambling) is driving this preference.

<sup>6</sup> The total number of gambling premises fell by 9% between Mar-18 – Mar-20 (Gambling Commission, 2020).



**Fig. 2 – Prior to the pandemic, ATMs at gambling premises were declining slower than those in banks / POs. In 2020, however, this pattern reversed and we started to see a rapid decline.**

Number of ATMs at different types of venue, indexed so that their Feb 2018 value equals 100



**Fig. 3 – ATMs in gambling premises are in more deprived areas on average**

Mean deprivation decile of area (LSOA) where ATMs / premises are located (1=most deprived, 10 = least)

ATM/Premises type	Mean deprivation decile	Standard deviation	Frequency
ATMs	3.9	2.7	53,515
Free ATMs	4.0	2.7	40,543
Surcharging ATMs	3.5	2.6	12,972
ATMs in gambling premises	2.4	2.1	856
ATMs in bingo venues	2.1	1.8	450
ATMs in casinos	3.3	2.2	148
ATMs in amusement arcades	1.9	1.9	170
ATMs in other types of gambling venue (e.g. betting shop)	2.8	2.7	91
ATMs in supermarkets	4.4	2.8	12,999
ATMs in banks	3.6	2.5	14,205
ATMs in post offices	3.8	2.7	2,555
Gambling premises	3.3	2.5	10,730
Adult Gaming Centre	2.8	2.3	1,537
Betting shop	3.4	2.5	8,099
Bingo	2.5	2.0	637
Casino	3.3	2.5	197
Family Entertainment Centre (e.g. amusement arcades)	2.8	2.6	232

**Notes:** deprivation decile based on the lower-layer super output area (LSOA) where the ATM/premises is located. Great Britain only. Please note that deprivation indices are calculated differently in England, Scotland and Wales – we have calculated deciles within each country.

It may also reflect the types of gambling venue that ATMs are most commonly found in. We find, for example, that as of August 2020, 53% of ATMs in gambling premises were at bingo venues, 20% at amusement arcades, 17% at casinos and 11% at other types of gambling venue (including betting shops). Data from the Gambling Commission suggests that the number of adult gaming centres, bingo venues and casinos has remained more stable than for betting shops (which fell by 10% between March 2018 and March 2020) (Gambling Commission, 2020a).

We also find that ATMs located at gambling premises were slightly less likely than average to be pay-to-use (PTU). While overall in Britain, 24% of ATMs at the end of August 2020 were PTU, this falls to 20% among those based at gambling premises.

As shown in Figure 3, we find that ATMs located at gambling premises are on average in more deprived areas than ATMs in other types of venue, but also when compared with the location of gambling premises themselves. In other words, while gambling premises tend to be located in relatively deprived areas, it is the ones in the most deprived areas that appear more likely to have an ATM. This association may partially be explained by greater reliance on cash in general in areas of greater deprivation. In contrast, ATMs in supermarkets, banks and post offices are in significantly less deprived areas on average.

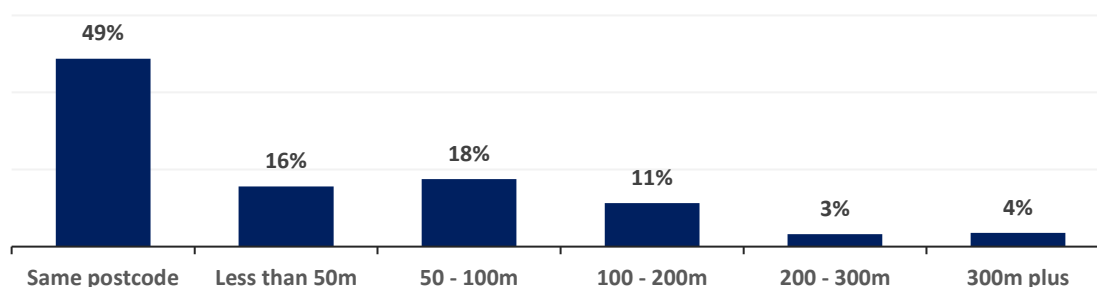
## 5. Distance from gambling premises to the nearest ATM

While ATMs located within gambling premises are likely to have the lowest level of ‘friction’ involved in withdrawing cash for those gambling, people could also have easy access to cash outside of the venue. To test this, we use data on the location of gambling premises (as of November 2020) combined with ATM location data to estimate the distance (as the crow flies) between gambling premises and the nearest ATM. This is based on measuring the distance from postcode to postcode, so it is not exact; however, it gives an indication as to the broad range of distances that people may have to travel.

As shown in Figure 4, nearly half of gambling premises (49% or 5,230 of 10,730) have an ATM within the same postcode – with postcodes on average covering about 15 premises. Without precise coordinates we are unable to estimate the distance between the gambling premises and ATM, though it is presumed in most cases to be very small. A further 16% of all gambling premises are located in a postcode within 50m of the nearest ATM’s postcode, while a further 18% are within 50-100m. This means that the vast majority of gambling premises are likely to have an ATM within easy walking distance for most people.

**Fig. 4 – Most gambling premises are within walking distance of the nearest ATM**

Percentage of gambling premises where the nearest ATM is within a given radius (in metres)



**Notes:** distance measured ‘as the crow flies’ from the centre of the postcode where the gambling premises is located to the centre of the postcode where the ATM is located. Actual distance may be higher or lower. ‘Same postcode’ means that both full postcodes match one another.

From an access to cash perspective more generally, it is also interesting to understand how often an ATM inside a gambling venue is the only option for withdrawing cash in a given area. Analysis of the ATM data suggests that this is actually quite rare. For August 2020, just 33 ATMs located inside a gambling premises were more than 250m (a 4-5 minute walk) from the next nearest ATM. This falls to just 11 ATMs when we look at those with no alternative within 500m. Additionally, it should be noted that some of these may have nearby access to cash via another method, such as a Post Office or bank branch, or via 'cashback' withdrawn from retailer tills.

## 6. Conclusions

### **Relatively few ATMs are based at gambling premises.**

The study leads to several conclusions – the first of which is that, especially following the first wave of the coronavirus pandemic, relatively few gambling premises were home to an ATM. Throughout our study period, there was just one ATM per every 10 or so gambling premises and only 1.6% of all ATMs were based at a gambling premises as of August 2020.

Current licensing conditions mean that ATMs should be located in a place that requires customers to cease gambling and leave the gambling product in order to use it. While this is positive, it remains unclear whether those gambling venues that have ATMs in or nearby truly offer customers a sufficient break from their gambling.

It is interesting to note that ATMs were more commonly associated with bingo venues, amusement arcades and casinos than with betting shops; and that a relationship with deprivation also appears to exist. It is likely that the latter can partially be explained by likely higher demand for cash among those living in more deprived areas, as implied by studies such as the Access to Cash Review (2019).

### **It is unlikely that gambling operators are installing ATMs in response to interventions such as bank card gambling blocks.**

A positive finding from the study is that it appears unlikely that gambling operators have deliberately been installing ATMs in an attempt to circumvent strategies that people may be using to manage their gambling – such as bank gambling blocks. The first banks to introduce such a block were Monzo and Starling in the summer of 2018, with other, larger banks following. As our ATM data covers the period from February 2018 to August 2020, any reaction from gambling operators to introduce ATMs in their premises would have been detected; but we see no evidence of this occurring.

This may partly reflect previous acknowledgement from the gambling industry in Britain that removing ATMs from gambling venues is considered 'responsible'. In 2013, the Association of British Bookmakers (ABB) appeared to be drawing up a responsible gambling code which would include the measure that "no ATMs should be located within betting shops operated by members" (Bridge, 2013). In response to this, some gambling operators such as Ladbrokes, William Hill and Paddy Power said they did not have cash machines inside of shops and had no plans to install them. However, there is no mention of this currently on the ABB's website under its responsible gambling policies.

### **In most cases, there is usually a cash machine close to the gambling venue anyway.**

There may be little need for gambling operators to install cash machines because the places where their premises are located are often very close to the nearest ATM. Nearly half (49%) of gambling premises have an ATM within the same postcode and a further third (34%) have one within a 100m radius. This means that if someone wishes to use cash as means to circumvent a bank card gambling block then it is practically impossible to stop them entirely.

The onus should therefore be on financial services firms to proactively offer controls or limits on cash withdrawals for those customers who might benefit from them and to signpost customers to other forms of self-exclusion from gambling. To monitor this, it seems important that firms use the transaction data available to them to further understand whether some customers – in particular, those who previously spent high amounts of money at land-based gambling premises – are withdrawing more cash (or using any other type of emerging payment mechanism more – as discussed below) since turning on a gambling block on their debit card.

### **Other payment methods are increasingly important.**

There are more than 170 different payment methods for online gambling (Swanton *et al*, 2019) and there is likely to be increased innovation in payments within land-based venues as well. Our previous study looking at access to cash in the UK, for example, found that in 2019-20 more than one in ten (12% of) places where cash was withdrawn from retailer tills in the form of cashback were gambling venues (Tischer *et al*, 2020). The Government's Gambling Act review is also considering relaxing certain rules surrounding cashless payments in gambling venues (to allow the industry to keep up with how payments have progressed over time).

This proliferation of payment mechanisms has implications for bank card gambling blocks. In particular, there are risks posed by faster payments direct to gambling operators (which are not subject to a merchant category code that allows the bank to identify it as gambling (Monzo Bank, 2021)), e-wallets, and pre-paid cards (GamCare, 2021a). Cryptocurrencies and payment by mobile phone account or 'app store' credit also pose significant challenges that will require further research and intervention (Gamban, 2021; Philander *et al*, 2021). Gainsbury and Blaszyński (2017), for example, highlight the range of ways that cryptocurrencies and blockchain technology could 'revolutionise' online gambling, including giving gamblers the ability to "operate outside of regulatory jurisdictions".

### **Are gambling operators taking sufficient action where there is evidence of potential harm?**

We do not know from this research whether staff in land-based gambling venues are taking the right steps where there is evidence of financial difficulty or a desire to self-exclude (for example, if a card payment is declined). The Gambling Commission states in its guidance for operators that 'declined payments' are one possible trigger for the operator to initiate an interaction with the customer to understand the risk of harm that they may face (Gambling Commission, 2019). It expects the operator to take action where necessary, including 'refusing service or ending the business relationship'.

Additionally, the existence of workarounds such as cash – and increasingly via a range of new digital ways of paying – highlights the importance of gambling operators conducting better affordability checks for gamblers, sharing data across operators via a 'single customer view'. Such checks, which the UK Government appears keen to introduce in its review of the Gambling Act (Barber, 2021), would ensure a last layer of protection from harm for those who find workarounds to self-exclusion tools or who are not aware that such tools exist.

### **Further research: account and transaction data**

To-date the majority of research on the relationship between different payment mechanisms, such as cash, and gambling have been based on survey data or interviews with gamblers, rather than data on their actual behaviour. Both gambling operators and the financial services industry have a wealth of account and transaction data that would allow us to better answer questions about the impact – for people's finances, at least – of different interventions, such as the removal of ATMs or what happens when a gambling premises closes. Muggleton *et al*'s (2021) research using Lloyds Bank data to understand the association between gambling spend and a range of negative financial and health outcomes shows the possibilities of such data, while Inkster *et al* (2019) have described the value of

such data for research on mental health. Skatova (2020) has also explored the potential of linking financial data to longitudinal research studies containing standardised measures of health and wellbeing in participants over time. Such approaches would shed further light on the impacts of different interventions to reduce the harm from gambling, complementing the growing body of evidence provided by those with lived experience of harmful gambling.

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## Appendix

### ATM data

Data on the location of ATMs within the UK was supplied by LINK for four time periods, each based on the final working day of that month: February 2018, February 2019, February 2020, and August 2020. The data is submitted to LINK by its members, and LINK relies on them to provide accurate information. While LINK takes steps to verify the information and ensure it is accurate, it cannot guarantee it is 100% accurate.

To be comparable with the gambling premises dataset – and the jurisdiction of the Gambling Commission – ATMs outside of Britain were removed, e.g. those in Northern Ireland and the Isle of Man.

### Gambling premises data

Data on the location of gambling premises was provided to the research team by the Gambling Commission, as part of a national register of premises licences for gambling that it maintains. This dataset is provided to the Gambling Commission by local licensing authorities, which are usually the local authority where the premises are located. The Gambling Commission (2021) cautions that “whilst we make every effort to assure the data, it may contain errors, duplications or there may be omissions.”

The research team cleaned the gambling premises data and removed duplicates as far as possible. Duplicates were first identified on the basis of perfect matches (based on address, postcode and activity type); and then near-duplicates (for example, where different spellings had been used for the same premises).

It should be noted that some premises within the dataset are those where a licence was being applied for at the time the dataset was created. These mainly appear to be existing premises re-applying for a licence; however, some may be entirely new applications.

### Analysis

Statistical analysis and data preparation was conducted in *R*. The datasets were matched to other geographical data based on their postcode, using the National Statistics Postcode Lookup file (for May 2020). This included data on deprivation rank within each constituent country of Britain: England, Scotland and Wales. Areas were then assigned to deciles based on their deprivation rank *within* their country. This means that the most deprived decile of areas within Wales is treated the same as the most deprived decile within England and Scotland. While more complicated analyses can be used to control for possible differences in deprivation levels between countries (i.e. does ‘most deprived decile’ actually mean the same thing in each of the countries?), this approach was deemed suitable for the purposes of this analysis.

Distances between gambling premises and the nearest ATM, and between ATMs and the nearest alternative, were calculated using QGIS, a spatial analytics programme.

ATMs were identified as being based at a gambling venue (or supermarket, bank or Post Office) on the basis of the first line of the address (the premises) at which they were located. This process was largely automated, using *R* to identify words commonly used in the first line of addresses within the gambling premises dataset from the Gambling Commission and then pulling out ATMs in LINK’s

dataset which featured these words. For example, the word 'bingo' is common and therefore all ATMs at premises with 'bingo' in the first line of the address were identified. Similar processes were conducted using lists of supermarkets (ranging from major brands to convenience store chains) and banks.

### **Data copyright notices**

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