



## **Part 1: Relaxation of casino rules**

**Q1.a. Do you agree with the proposed gaming machine entitlements based on the sliding scale for:**

- (i) gambling space**
- (ii) table gaming space**
- (iii) non-gambling area**
- (iv) machine-to-table ratio (Mandatory response)**

[Yes / **No** / I don't know]

**Q1.b. Please explain your answer. If you selected 'No', please provide an alternative proposal for gaming machine entitlements if you have one. (Optional response)**

[Open text box]

Whilst we fully support the focus on online gambling, which has been allowed to substantially develop in a largely uncontrolled environment, we are keen to highlight that land-based gambling remains highly dangerous and is often the only option for people suffering harm that have self-excluded online. Digital gambling is more dangerous, and this must be recognised by this consultation.

The current amount of gambling machines permitted in land-based gambling venues contributes to unacceptable levels of gambling harm in the UK, with up to 1.4 million adults addicted/at risk and hundreds of deaths a year linked to gambling.

We are aware that many gambling venues, including casinos, bingo halls and adult gaming centres rely on gaming machines to remain viable. This is because the 'basic physical product(s)' are not sufficiently attractive to venues' customers: many of those products do not have the same addiction/at risk rates as EGMs.

We feel strongly that it is against the spirit of the proposed legislation to introduce more highly addictive products into all environments to compensate for the failure of those venues to offer products and an experience which customers are prepared to pay for. Different gambling experiences must be viable within their own right rather than resorting to 'cross subsidy' by highly addictive products.

More machines mean more harm, addiction, and ultimately more suicide. The government should not be looking to increase the number of gambling machines or increasing access to gambling in any land-based venues.

This fundamental point applies across this consultation.



**Q2.a. If you are an operator, do you intend to take up these new entitlements?** (Mandatory response)

[Yes / No / I don't know / Not applicable]

**Q2.b. [Shown if Yes is selected] Do you intend to site the maximum number of machines available to you?** (Mandatory response)

[Yes / No / I don't know]

**Q2.c. Please explain your answer.** (Optional response)

[Open text box]

**Q3.a. If you are an operator with more than one premises licence at the same location, do you intend to take up these new entitlements for each licence?** (Mandatory response)

[Yes / No / I don't know / Not applicable]

**Q3.b. Please explain your answer.** (Optional response)

[Open text box]

**Q4.a. Do you perceive there to be any issue with allowing multiple casino licences in the same physical location if gaming machine entitlements are increased as proposed?** (Mandatory response)

[Yes / No / I don't know]

**Q4.b. Please explain your answer, including any suggested changes to the regulatory framework where applicable.** (Optional response)

[Open text box]



If gambling machine entitlements are increased as proposed, then a rise in gambling harm will follow, which is not compatible with the aims of the Review.

**Q5.a. How do you expect the measures allowing more gaming machines in 1968 Act casinos that meet certain size requirements to affect the demand for gaming machines in casinos?** (Mandatory response)

[Large increase in demand / Small Increase in demand / No change in demand / Small decrease in demand / Large decrease in demand / I don't know]

**Q5.b. Please explain your answer.** (Optional response)

[Open text box]

**Q6.a. How do you expect the measures allowing more gaming machines in 1968 Act casinos to impact the provision of other product offerings within casinos e.g. table gaming?** (Mandatory response)

[Large increase in the provision of other product offerings / Small increase in the provision of other product offerings / No change in provision of other product offerings / Small decrease in the provision of other product offerings / Large decrease in the provision of other product offerings / I don't know]

**Q6.b. Please explain your answer.** (Optional response)

[Open text box]

**Q7.a. The government is proposing to operate two regimes for 1968 Act casinos whereby they can either operate under the existing rules with no increase to their gaming machine allowance or they can take up their new gaming machine entitlements under the new rules. Do you agree with this proposal?** (Mandatory response)

[Yes / No / I don't know]



**Q7.b. Please explain your answer.** (Optional response)

[Open text box]

**Q8. Please provide any views or any other information on the adequacy of player protections for those using gaming machines in casinos. Please include any examples of best practice if possible.** (Optional response)

[Open text box]

**Q9.a. Should the government introduce a 5:1 machine to table ratio for all casinos except those 1968 Act casinos that remain on the existing licensing regime?** (Mandatory response)

[Yes / **No** / I don't know]

**Q9.b. Please explain your answer.** (Optional response)

[Open text box]

**Q10. Please share any evidence or information that is relevant to the proposed amendment to the definition of gaming tables since the government stated its intention to make this change in 2018.** (Optional response)

[Open text box]

**Q11.a. Do you agree with the proposed (i) minimum gambling area; (ii) table gaming area; and (iii) non-gambling area requirements for 1968 Act casinos under the new regime?** (Mandatory response)

[Yes / **No** / I don't know]



**Q11.b. Please explain your answer.** (Optional response)

[Open text box]

**Q11.c. Should the minimum table gaming area for Small 2005 Act casinos be reduced to 250sqm?** (Mandatory response)

[Yes / No / I don't know]

**Q11.d. Please explain your answer.** (Optional response)

[Open text box]

**Q12.a. Should access to a greater number of gaming machines require compliance with each of the three size requirements outlined above?** (Mandatory response)

[Yes / No / I don't know]

**Q12.b. Please explain your answer.** (Optional response)

[Open text box]

**Q13.a. Which approach do you think should be taken in relation to the maximum gambling area for 1968 Act casinos?** (Mandatory response)

[All 1968 Act casinos must have a gambling area less than 1,500sqm / All 1968 Act casinos must have a gambling area less than 1,500sqm, with an exemption for 1968 Act casinos that are currently open and have a gambling area of 1500sqm or more / No maximum gambling area at all for 1968 Act casinos / Other / I don't know ]

**Q13.b. Please explain your answer.** (Optional response)

[Open text box]



**Q14.a. Should separate table gaming areas of 12.5% or more only be allowed to count towards the total table gaming area for 1968 Act casinos under the new regime? (Mandatory response)**

[Yes / **No** / I don't know]

**Q14.b. Please explain your answer. (Optional response)**

[Open text box]

**Q15.a. Under current regulations, the following areas can be used to calculate the non-gambling area in a 2005 Act and 1968 Act casino:**

- **Facilities for gambling cannot be provided in the non-gambling area.**
- **Lobby areas and toilet facilities may be taken into account but the non-gambling area shall not consist exclusively of lobby areas and toilet facilities.**
- **Each separate area comprising the non-gambling area, other than the lobby areas and toilet facilities, must contain recreational facilities that are available for use by customers on the premises.**
- **Any non-gambling area may consist of one or more areas within the premises**

**Do you agree that this should remain the same under the new regime? (Mandatory response)**

[Yes / **No** / I don't know]

**Q15.b. Please explain your answer, including an alternative solution for how to calculate non-gambling areas where applicable. (Optional response)**

[Open text box]

**Q16.a. Should all 1968 Act casinos be permitted to offer sports betting, regardless of size? (Mandatory response)**



[Yes / **No** / I don't know]

**Q16.b. Please explain your answer.** (Optional response)

[Open text box]

**Q17.a. Do you agree with the proposed entitlements for Self-Service Betting Terminals (SSBTs) based on the sliding scale?** (Mandatory response)

[Yes / **No** / I don't know]

**Q17.b. Please explain your answer, including an alternative proposal for SSBT entitlements where applicable.** (Optional response)

[Open text box]

**Q18.a. If you are a casino licence operator, what impact is permitting sports betting expected to have on the Gross Gambling Yield (GGY) of your casino(s)?** (Mandatory response)

[Significant increase / Slight increase / No impact / Slight decrease / Significant decrease / I don't know / Not applicable]

**Q18.b. Please explain your answer.** (Optional response)

[Open text box]

**Q19. If your casino already offers sports betting, what is the GGY from this activity? Please provide an estimate if you do not have an exact figure.** (Optional response)

[Open text box]



**Q20.a. What impact is permitting sports betting expected to have on revenue from non-gambling activities e.g. increased income from sports bars which allow customers to place a bet? (Mandatory response)**

[Increased revenue / No impact/ Decreased revenue / I don't know]

**Q20.b. Please explain your answer. (Optional response)**

[Open text box]

**Q21. What player protections could be adopted in casinos for those customers participating in sports betting? (Optional response)**

[Open text box]

**Q22.a. Do you agree with the proposal that casino operators will be required to notify licensing authorities and the Gambling Commission if they decide to take-up their entitlement to additional gaming machines under the new regime? (Mandatory response)**

[Yes / No / I don't know]

**Q22.b. Please explain your answer. (Optional response)**

[Open text box]

**Q23.a. Should the operating and premises licence fees that apply to 2005 Act casinos also apply to 1968 Act casinos that increase their gaming machine entitlements? (Mandatory response)**

[Yes / No / I don't know]

**Q23.b. Please explain your answer. (Optional response)**

[Open text box]

**Q24. Please upload any further evidence or any other information that should be considered as part of this consultation relating to casino measures. (Optional response)**





[File upload]

## **Part 2: Machines in arcades and bingo halls**

**Q25.a. There are 3 options the government is considering related to gaming machine allowance for arcades and bingo halls:**

- **Option 1:** Introduce the 50/50 rule while maintaining current requirements for 'available for use'.
- **Option 2:** Introduce the 50/50 rule with an additional requirement that any gaming machine device types offered in individual premises (whether cabinets, tablets (fixed or hand-held) or in-fill) comprise a minimum of 50 percent Category C and D machines. Also, Category C and D gaming machine device types made available for use must be of similar size and scale to Category B.
- **Option 3:** Remove the 80/20 rule completely, applying no requirements on set gaming machine ratios.

**How, if at all, would the approaches taken in Options 1, 2 and 3 impact the ability of business to meet customer demand for gaming machines? Please answer in comparison to the current 80/20 rule. (Mandatory response)**

[A significant increase in ability to meet demand / A slight increase in ability to meet demand / No impact / A slight decrease in ability to meet demand / A significant decrease in ability to meet demand / I don't know]

**Q25.b. Please explain your answer. (Optional response)**

[Open text box]

**Q26.a. What impact would options 1, 2 and 3 have on Gross Gambling Yield (GGY) for businesses? (Mandatory response)**

[A large increase in GGY / A small increase in GGY / No impact on GGY / A small decrease in GGY / A large decrease in GGY / I don't know]

**Q26.b. If available, please provide evidence of the potential impact of Options 1, 2 and 3 on the GGY of operators and on the wider gambling sector. (Optional response)**

[Open text box]



**Q27.a. There are 3 options the government is considering related to gaming machine allowance for arcades and bingo halls:**

- **Option 1:** Introduce 50/50 while maintaining current requirements for 'available for use'.

- **Option 2:** Introduce the 50/50 rule with an additional requirement that any gaming machine device types offered in individual premises (whether cabinets, tablets (fixed or hand-held) or in-fill) comprise a minimum of 50 percent Category C and D machines. Also, Category C and D gaming machine device types made available for use must be of similar size and scale to Category B.

- **Option 3:** Remove the 80/20 rule completely, applying no requirements on set gaming machine ratios.

(Mandatory response)

**What impact would Options 1, 2 and 3 have on the overall number of Category B machines?**

[Significant increase / Small increase / No impact / Small Decrease / Significant Decrease / I don't know]

**Q27.b. What impact would Options 1, 2 and 3 have on the overall number of Category C machines?** (Mandatory response)

[Significant increase / Small increase / No impact / Small Decrease / Significant Decrease / I don't know]

**Q27.c. What impact would Options 1, 2 and 3 have on the overall number of Category D machines?** (Mandatory response)

[Significant increase / Small increase / No impact / Small Decrease / Significant Decrease / I don't know]

**Q27.d. If available, please provide estimates of the potential impact of Options 1, 2 and 3 on the overall number of machines.** (Optional response)

[Open text box]



**Q27.e. What impact would Options 1, 2 and 3 have on the product mix of Category B, C and D machines? For example, cabinets and terminal devices.** (Optional response)

[Open text box]

**Q28. Please provide any evidence you have on the potential harm of implementing Options 1, 2 and 3 on customers.** (Optional response)

[Open text box]

**Q29.a. There are 3 options the government is considering related to gaming machine allowance for arcades and bingo halls:**

- **Option 1:** Introduce the 50/50 rule while maintaining current requirements for 'available for use'.
- **Option 2:** Introduce the 50/50 rule with an additional requirement that any gaming machine device types offered in individual premises (whether cabinets, tablets (fixed or hand-held) or in-fill) comprise a minimum of 50 percent Category C and D machines. Also, Category C and D gaming machine device types made available for use must be of similar size and scale to Category B.
- **Option 3:** Remove the 80/20 rule completely, applying no requirements on set gaming machine ratios.

**What impact would Options 1, 2 and 3 have on the overall number of Category B, C and D gaming machines? Please rank these options in order of preference, with 1 being your preferred option.** (Optional response)

**Q29.b. Please explain why this is your preferred option.** (Optional response)

[Open text box]

**Q30.a. Please outline any other proposals relating to machine allowances in arcades and bingo halls that you think that we should consider.** (Optional response)

[Open text box]

**Q30.b. What benefit would this proposal(s) offer in comparison to Options 1, 2 and 3?** (Optional response)



[Open text box]

**Q31. Please upload any further evidence or any other information that should be considered in this consultation relating to bingo and arcade gaming machine measures. (Optional response)**

[Open text box]

### **Part 3: Cashless payments on gaming machines**

**Q32.a. Should card account verification (such as chip and PIN or Face ID on mobile payment systems) be required if direct cashless payments are permitted on gaming machines? (Mandatory response)**

[Yes / No / I don't know]

**Q32.b. [Shown if Yes is selected] Should card account verification (such as chip and PIN or Face ID on mobile payment systems) be required on each transaction? (Mandatory response)**

[Yes / No / I don't know]

**Q32.c. How often should card account verification be required? For example, after a certain number of transactions or when a customer hits a spend threshold. (Optional response)**

[Open text box]

Card account verification should be required for every transaction.

**Q33.a. What should the maximum transaction value be for direct cashless payments on gaming machines? (Mandatory response)**

[£20 / £50 / £100 / No Limit / Other / I don't know]



**Q33.b. [Shown if Other is selected] Please specify what you think the maximum transaction should be (£). (Optional response)**

[Sliding scale – £0 - £100]

**Q34.a. Should the maximum deposit limit for direct cashless payments be the same as those set by the Circumstances of Use Regulations 2007? (Mandatory response)**

[Yes / No / I don't know]

**Q34.b. [Shown if No is selected] What do you think the maximum deposit limit should be for the following machine categories (£)? (Optional response)**

- i) Category B1 machines
- ii) Category B2 machines?
- iii) Category B3 machines?
- iv) Category B3A machines?
- v) Category B4 machines?
- vi) Category C machines?
- vii) Category D machines?

[Sliding scale]

**Q35.a. Should the maximum committed payment limit for direct cashless payments be the same as those set by Circumstances of Use Regulations 2007? (Mandatory response)**

[Yes / No / I don't know]

**Q35.b. [If No is selected] What do you think the maximum committed payment limit should be for the following machine categories (£)?**

- i) Category B1 machines?
- ii) Category B2 machines?
- iii) Category B3 machines?
- iv) Category B3A machines?
- v) Category B4 machines?
- vi) Category C machines?



vii) Category D machines? (Optional response)

[Sliding scale]

**Q36.a. Should there be a minimum transaction time for customers making a cashless transaction on a gaming machine?** (Mandatory response)

[Yes / No / I don't know]

**Q36.b. [If Yes is selected] What do you think this minimum transaction time should be?** (Optional response)

[Sliding scale]

1 minute

**Q37.a. Should there be voluntary limits (the ability for customers to set time and monetary thresholds) on gaming machines accepting direct cashless payments?** (Mandatory response)

[Yes / No / I don't know]

**Q37.b. How long do you think the cooling-off period should be if voluntary limits are hit?** (Optional response)

[Sliding scale]

24 hours

**Q38.a. Should there be mandatory limits (default limits for time and monetary thresholds) on machines accepting direct cashless payments?** (Mandatory response)

[Yes / No / I don't know]



**Q38.b. [Shown if Yes is selected] What should the mandatory limits be?** (Optional response)

- i) Monetary thresholds
- ii) Time thresholds

[Sliding scale]

**Q38.c. [Shown if Yes is selected] How long do you think the cooling-off period should be once mandatory limits are hit?** (Optional response)

[Sliding scale]

24 hours

**Q39.a. When limits are hit, should that result in a staff alert as well as a customer alert?** (Mandatory response)

[Yes / No / I don't know]

**Q39.b. Please explain your answer.** (Optional response)

[Open text box]

Limits must be robustly enforced by staff and not left down to people, who in all likelihood are being harmed, to adhere to.

**Q40.a. In your view, is there any specific safer gambling messaging that should be considered within cashless gambling?** (Mandatory response)

[Yes / No / I don't know]

**Q40.b. [Shown if Yes is selected] What messaging would you suggest introducing? Please include any evidence of the potential impact of this messaging.** (Optional response)



[Open text box]

Any “safer gambling” messages displayed must be from the Department of Health and Social Care about the health risks associated with gambling.

It must be completely free of the influence of the gambling industry and not relying on self-imposed measures or restrictions.

**Q41.a. Should session time be visible at all times to the customer on machines accepting direct cashless payments?** (Mandatory response)

[Yes / No / I don't know]

**Q41.b. Please explain your answer.** (Optional response)

Gambling can distort an individual's sense of time, creating heightened risk of harm – therefore it is important this information is clearly available and not hidden.

[Open text box]

**Q42.a. Should net position be visible at all times to the customer on machines accepting direct cashless payments?** (Mandatory response)

[Yes / No / I don't know]

**Q42.b. Please explain your answer.** (Optional response)

[Open text box]

As with our answer to the previous question, steps must be taken to ensure that information such as net gain/ loss and time spent gambling are not hidden from gamblers.

Gambling hijacks the reward-seeking pathways of the brain and can distort sense of time, increasing the risk of harm, especially when a gambling session ends.





**Part 4: Introduction of an age limit on ‘cash out’ slot-style Category D machines**

**Q44.a. Should the government introduce an age limit on ‘cash-out’ Category D slot-style machines to 18 and over?** (Mandatory response)

[Yes / No / I don't know]

**Q44.b. Please explain your answer, providing any supporting evidence where available.** (Optional response)

[Open text box]

Category D machines – “cash fruit machines” which are often found in seaside arcades and family ‘amusement’ centres and resorts, with a maximum 10p stake and a maximum £5 cash prize – currently have no legally enforceable age limits. However, these machines can be very dangerous and their classification as ‘Category D’ (the lowest such ranking) is misleading.

Although £5 may not be a significant amount of money to an adult, it certainly is to a child: to a child, Category D machines are just like fruit machines and other electronic gaming machines are to adults. Playing these machines can lead to habit-forming behaviour and a desire to increase gambling activity.

Several of the loved ones lost by GwL families began on these machines and they acted as a pathway to their gambling disorder.

We note and welcome that BACTA has introduced a voluntary 18+ for Category D in 2020 and believe that this should be mandated into law and enforced across all venues, nationwide.

**Q45.a. Should ‘cash-out’ Category D slot-style machines be required to move to age-restricted areas in venues?** (Mandatory response)

[Yes / No / I don't know]

**Q45.b. Please explain your answer, providing any supporting evidence where available.** (Optional response)



[Open text box]

Moving Category D slot machines to age-restricted venues would make enforcing age verification much easier and significantly limit the number of children and young people playing these machines.

**Q46. What measures, if any, do you think venues should adopt to ensure that no under-18s play on 'cash-out' Category D slot-style machines if the age limit is introduced?** (Optional response)

[Open text box]

Staff should carry out stringent ID checks – no-one should be allowed into an age-restricted area without valid ID and any venue found to be not adhering to these rules should face the threat of licence revocation.

**Q47.a. Do you think premises should adopt voluntary test purchasing as a way to monitor under-18s activity on Category D 'cash-out' slot-style machines?** (Mandatory response)

[Yes / No / I don't know]

**Q47.b. Please explain your answer, providing any supporting evidence where available.** (Optional response)

[Open text box]

Test purchasing could be an effective way to determine venues that consistently allow children and young people to use Category D machines.

It's important that fines and other punitive measures are implementing for these venues as they would be an effective way to encourage behaviour change.

This system should operate on a three strikes basis whereby if a premises allows children to use a Category D machine 3 times, its licence is revoked.



**Q48.a. Should it be a criminal offence for a person to invite, cause or permit children or young persons to play on these machines? (Mandatory response)**

[Yes / No / I don't know]

**Q48.b. Please explain your answer, providing any supporting evidence where available. (Optional response)**

[Open text box]

As outlined in our answer to 44b, Category D machines can be very dangerous and often act as the route into addiction for children and young people.

Therefore, anyone who facilitates or encourages their use by children and under-18s must be punished accordingly.

**Q49. Please upload any further evidence or any other information that should be considered as part of this consultation relating to an age limit on 'cash-out' Category D slot-style machines. (Optional response)**

[File upload]

### **Part 5: Licensing authority fees**

**Q50.a. If you are a local authority/ licensing board, how much funding did you receive in licensed gambling premises fees in the 2022/23 financial year? Expressed in thousands of pounds. (Optional response)**

[Sliding scale]

**Q50.b. If you are a local authority/ licensing board, how many premises licence applications did you receive in the 22/23 financial year? (Optional response)**

[Sliding scale]

**Q50.c. If you are a local authority/ licensing board, how many premises licences were live in your licensing area in the 22/23 financial year? (Optional response)**



[Sliding scale]

**Q51.a. If you are a local authority/ licensing board, do you currently charge the maximum fees as set out in the Gambling Act 2005?** (Optional response)

[Yes / No / I don't know]

**Q51.b. [Shown if No is selected] Please explain why you do not currently charge the maximum fees as set out in the Gambling Act 2005.** (Optional response)

[Open text box]

**Q52.a. How much funding do you estimate is needed for administration and the enforcement of licences annually? Expressed in thousands of pounds.** (Optional response)

[Sliding scale]

**Q52.b. Please explain your answer, providing any supporting evidence where available.** (Optional response)

[Open text box]

**Q53. Are there any functions that local authorities/ licensing boards do not exercise at present, but could if fees were increased (e.g. a more proactive enforcement policy)?** (Optional response)

[Open text box]

**Q54.a. The government is considering raising maximum licence fees for gambling premises. Should maximum fees be increased, how much should they be increased by?** (Mandatory response)

[10% / 20% / 30% / A different amount / I do not think fees should be increased / I don't know]



**Q54.b. Please explain your answer.** (Optional response)

[Open text box]

**Q55.a. What do you think are the potential impacts of raising licence fees on licensing authorities?** (Optional response)

[Open text box]

**Q55.b. What do you think are the potential impacts of raising licence fees on gambling companies?** (Optional response)

[Open text box]

**Q55.c. What do you think are the potential impacts of raising licence fees on the local area?** (Optional response)

[Open text box]

**Q56. Please provide any additional views or evidence on the potential impacts of raising licence fees here.** (Optional response)

[Open text box]

**Q57. Please upload any further evidence or any other information that should be considered in this consultation relating to licensing authority fees.** (Optional response)

[File upload]

**Q58. The Department for Culture, Media and Sport will have due regard to the public sector equality duty, including considering the impact of these proposals on those who share protected characteristics, as provided by the Equality Act 2010. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.**

\*\*Please indicate if you believe any of the proposals in this consultation are likely to impact persons who share such protected characteristics and, if so, please explain



which group(s) of persons, what the impact on any such group might be and if you have any views. (Optional response)

[Open text box]

**Q59. Please upload any further supporting evidence that you wish to share.** (Optional response)

[File upload]