



Overview:

<https://www.gov.uk/government/consultations/a-maximum-stake-limit-for-online-slots-games-in-great-britain>

The government is consulting on a stake limit of between £2 and £15 per spin and slot-specific measures to give greater protections for 18 to 24-year-olds who the evidence suggests may be a particularly vulnerable cohort.

We are also seeking views on details to support the effective implementation of the policy, including the meaning of 'online slots games', 'maximum stake' and 'spin/game cycle'.

The purpose of this consultation is to ensure that the government is able to consider the best available evidence, including on the impact of each option when finalising policy decisions.

Reference docs [here](#) and [here](#)

Questions:

Q1.a. Chapter 2 of the consultation document provides important information which may help you answer these questions.

For the purposes of introducing a maximum stake limit, the government intends to align with the definition of online slots used by the Gambling Commission. We therefore intend for the limit to apply to:

'Remote casino games of a reel-based type (including games that have non-traditional reels or which combine elements of other games within a slot game mechanic).'

Does this description of online slots adequately describe the products intended for inclusion in the maximum stake limit's scope?*

Required

- Yes
- No
- I don't know

Q1.b. Please explain your answer.

[TEXT BOX]



Q2.a. Chapter 2 of the consultation document provides important information which may help you answer these questions.

The government is developing a description of a maximum stake. This description will be adapted in legislation to introduce a maximum stake limit. The proposed description of a maximum stake is:

“Maximum stake per spin” means the maximum amount a player can pay or risk per spin or game cycle”

Is this description of maximum stake suitable for the purpose of the introduction of a maximum stake limit for online slots games?*

Required

- Yes
- No
- I don't know

Q2.b. Please explain your answer.

[TEXT BOX]

Q3.a. Chapter 2 of the consultation document provides important information which may help you answer these questions.

For the purposes of introducing a maximum stake limit per spin or game cycle, the government intends to align with the definition of game cycle used by the Gambling Commission’s Remote Technical Standards. Game cycle is defined as:

“A game cycle starts when a player depresses the ‘start button’ or takes equivalent action to initiate the game and ends when all money or money’s worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game.”

Is this description of game cycle suitable for the purpose of the introduction of a maximum stake limit for online slots games?*

Required



- Yes
- No
- I don't know

Q3.b. Please explain your answer.

[TEXT BOX]

Q4.a. Chapter 4 of the consultation document provides important information which may help you answer these questions.

The government is aiming to introduce a maximum stake limit that strikes an appropriate balance between preventing harm and preserving consumer freedoms.

What maximum stake limit for online slot games would you support, if any?*

Required

- £2
- £5
- £10
- £15
- None of the above
- I don't know

Q4.b. Please explain your answer, providing evidence where possible.

[TEXT BOX]

We firmly believe the maximum stake limit for online slots should be lower than £2.

Previously, including in our submission to the Gambling Act review's call for evidence, we have called for the maximum stake for online slots to be bought in line with land-based equivalents (FOBTs) and capped at £2. However, based on the latest evidence as presented below, our position has now changed.



The harms inflicted by online slots, and by gambling in general, are not just financial – gambling disorder is a mental health condition, classified as such by the DSM-V since 2014, which can lead to depression, relationship breakdown, unemployment, homelessness, and suicide. This year, the Office for Health Improvement and Disparities estimated there are up to 496 gambling-related suicides in England every year (OHID, 2023).

There is a growing evidence base that suggests online slots are one of the most dangerous and addictive products currently on the market, if not the most dangerous. Several of the loved ones lost the Gambling with Lives families were gambling on online slots around the time they died. Recent research by Paul Delfabbro et al (2023) supports the families' experiences, concluding that online slots had significantly more behavioural markers of harm than any other product.

Even when spinning at a relatively low stake size – £1.01 to £2 – over one in five gamblers suffer high or medium levels of harm (Gambling Commission, 2021), indicating the maximum stake must be set at significantly less than £2.

According to figures from the National Gambling Treatment Service, more people in treatment for gambling disorder in 2021/22 used online slots than any other product (GambleAware, 2022). The percentage of treatment seekers using online slots has been rising steadily for 8 years, illustrating the serious harm caused by this product.

Online slots provide a disproportionate amount of profit, accounting for almost 30% of online profits (Gambling Commission, 2022), despite a low participation of around 1% of gamblers (Gambling Commission, 2023). Within this, around 1% of slots players provide over 40% of slots profit (NatCen, 2022).

Additionally, online slots are associated with binge gambling and long gambling sessions, accounting for over 70% of single-product gambling sessions that last over three hours (NatCen, 2021). Slots also have the highest proportion of players that played for longer than 3 hours (NatCen, 2022). These factors create increased risk of harm that must be tackled through a range of measures, not just maximum stake size.

The FOBT stake reduction to £2 led to a huge reduction in gross gambling yield (GGY) for this type of gambling, yet FOBTs are still highly addictive, and were one of the most popular products among treatment seekers in 2021/22 (GambleAware, 2022), which highlights the need for a range of structural characteristics to be addressed, not just maximum stake sizes.

The current spin speed, for example, is set at 2.5 seconds minimum despite there being no evidence to suggest 2.5-second spins are safe. Indeed, this spin speed underpins current levels of addiction and harm, which clearly indicates it is not safe. It is much faster than other countries allow.

Assuming a £2 maximum stake and a 2.5-second spin speed, it would still be possible to gamble £3,600 an hour on online slots, with a loss of £360, or, with a £5



maximum stake limit, gamble £7,200 and lose £720 (both examples assume a return to player rate of 90%). Considering online slots' association with binge gambling, even a maximum stake size of £2 would clearly cause a lot of financial harm.

Lowering stake sizes in isolation would also result in an increase in spinning frequency and overall gambling time, increasing risk the of addiction. It is therefore crucial that spin speeds are addressed simultaneously with stake sizes, and decisions made in parallel to avoid the risk of this unintended consequence.

With reference to “Box 1 – International Approaches” in the briefing document, we note inadequacies of the measures listed. In fact, several other countries beside France do not allow online slots because they are too simply dangerous, including most states in the US, Turkey, and Poland.

Finally, we note that category B1 machines, which carry a maximum stake of £5, are only permitted within casinos, one of the most regulated and safest gambling environments.

Unlike FOBTs and category B1 machines, online slots are available in the least safe environment, with no physical welfare checks possible and accessible 24 hours a day, seven days a week, which supports our calls for the maximum stake to be lower than £2.

References

Delfabbro, P et al (2023) Behavioural markers of harm and their potential in identifying product risk in online gambling:

<https://link.springer.com/article/10.1007/s11469-023-01060-8>

GambleAware (2022) Annual Statistics from the National Gambling Treatment Service 2021–22 Great Britain:

https://www.begambleaware.org/sites/default/files/2022-11/202216_GA_Annual%20stats_report_English_v4.pdf

Gambling Commission (2021) Data request April 2021 (via briefing document):

<https://www.gov.uk/government/consultations/a-maximum-stake-limit-for-online-slots-games-in-great-britain/consultation-on-proposals-for-a-maximum-stake-limit-for-online-slots-games>

Gambling Commission (2022) Industry Statistics – November 2022:

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-november-2022>

Gambling Commission (2023) Statistics on participation and problem gambling for the year to March 2023: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-participation-and-problem-gambling-for-the-year-to-march-2023>

<https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-participation-and-problem-gambling-for-the-year-to-march-2023>



NatCen (2021) Exploring online patterns of play, interim report:

https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final.pdf#page=32

NatCen (2022) Patterns of Play, Technical Report 2: Account Data Stage:

https://natcen.ac.uk/sites/default/files/2023-03/Patterns%20of%20Play_Technical%20Report%20Account%20Data%20Stage%20Report.pdf

Office for Health Improvement and Disparities (2023) The economic and social cost of harms associated with gambling in England:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1128002/The-economic-cost-of-gambling-related-harm-in-England_evidence-update-2023.pdf

Q5.a. Chapter 5 of the consultation document provides important information which may help you answer these questions.

The government is seeking a balanced approach to the protection of young adults. We recognise the evidence of risks which can accompany potentially vulnerable young adults gambling on high risk online slots at high stakes, but also that as adults we must treat those aged 18-24 fairly and proportionately.

What maximum stake, if any, do you support for young adults aged 18-24?*

Required

- £2
- £4
- Consistent with the limit for all adults but with extra operator vigilance
- None of the above
- I don't know

Q5.b. Please explain your answer and reference any relevant supporting evidence if appropriate.

[TEXT BOX]



We fully support the need for additional protection for 18–24-year-olds. Evidence clearly shows the brain does not develop fully until 25, meaning this demographic is at increased risk of addiction and suffering harm: at this age, habits are more easily developed and the ability to sensibly process risk is compromised, leading to more risk-taking behaviour and increased participation in riskier activities.

Young people moving away from home for the first time to attend university are even more at risk, considering their sudden access to a whole term's student loan.

Therefore, this demographic must be considered as being at increased risk, with the risk further amplified when exposed to products as dangerous as online slots. Many of the children lost by the Gambling with Lives families started using online slots or similar products as young adults.

Therefore, the maximum stake for 18-24-year-olds must be considerably lower than the maximum stake for all other age groups, which we have argued should be lower than £2.

Furthermore, it is crucial that these measures are not just applied across a single product – all dangerous products must have additional controls for 18–24-year-olds.

Q6.a. Chapter 6 of the consultation document provides important information which may help you answer these questions.

The options considered throughout this consultation are likely to have significant impacts on both gambling customers (including those being harmed by gambling) and businesses. Our impact estimates for each option under consideration are considered in full in the consultation stage impact assessment.

Are there any additional impact considerations, including on the assumptions in the accompanying Impact Assessment or on the risk of unintended consequences?*

Required

- Yes
- No
- I don't know



Q6.b. Please explain your answer and provide relevant evidence. We would particularly welcome input on transition costs and on the impacts for small and micro businesses.

[TEXT BOX]

Q7. Chapter 6 of the consultation document provides important information which may help you answer these questions.

Q8. Are there any other factors or points you wish to highlight that have not been considered above?

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.