

Dear Sir/Madam

**Response to the Call for Evidence: Review of Gaming Machines and Social Responsibility Measures**

We welcome this opportunity to contribute to the Department for Culture, Media and Sport's Review of Gaming Machines and Social Responsibility Measures.

Gala Leisure is the largest bingo operator in the UK, with 131 clubs and over 1.1million active members.

Bingo is a social game where the value of prizes is related to the number of players taking part in the game.

In addition to bingo, our clubs offer a range of Category B3, C and D gaming machines, which according to the Ipsos MORI research 28% of our customers play before and after bingo and during the intervals between sessions.

Through our contributors to the Responsible Gambling Trust, we fund research into problem gambling and the issues associated with it.

Yours faithfully



## **Appendix A: Consultation Questions**

***Question 1: What, if any, changes in maximum stakes and/or prizes across the different categories of gaming machines support the Government's objective set out in this document? Please provide evidence to support this position.***

Category B, C and D machines

Gala Bingo's position on Category B3, C & D machines is to maintain the current maximum stakes and prizes. We believe there are limited benefits from any changes at this time and take the view that a period of stability would be beneficial in assisting the collection and correlation of data supporting our views on the efficacy of measures to promote social responsibility within the bingo industry.

***Question 2: To what extent have industry measures on gaming machines mitigated harm or improved player protections and mitigated harm to consumers and communities? Please provide evidence to support this position.***

We continue to work through the Bingo Association to introduce new measures to help us identify and quantify the impact of problem gambling on individuals and communities.

This has resulted in a National Self-Exclusion scheme being introduced to all bingo clubs in the UK in March of this year. It is estimated that 800 customers will self-exclude in its first year.

Research carried out by IPSOS MORI indicated that the biggest concern amongst problem gamblers was their lack of awareness of where to find help. As a result, we will, through the Bingo Association, work on improving our communications to ensure our customers are fully aware of where to go and how. This will be done through several work streams across the gambling sectors.

We are also reviewing our procedures on interventions, whereby we will be more proactive in approaching possible problem gamblers to try to initiate support measures at an earlier stage. As part of this we have already produced a data analysis tool which allows us to identify machine customers' playing patterns and are developing a similar system to electronic bingo players.

Since it was introduced in August 2015, we have identified 372 examples of suspicious behaviour. Of these, 295 have been escalated to clubs for further investigation, resulting in 25 interactions with customers.

Each of our clubs has completed a Local Risk Assessment which includes local crime statistics and is in line with local Licensing Authority Guidelines to identify and mitigate the impact of local conditions on our ability to comply with the three licensing conditions as set out in the Gaming Act 2005.

All of our premises have available literature to support our customers in knowing where to go if they have a problem. These are not only available in leaflet form but form part of all of our marketing material, machines, ATM's and Electronic Betting Terminals.

Our staff training covers all levels of employees with annual refresher training. The packages are e-learning based which form part of all our employee inductions.

Our Head of Risk and Compliance forms part of the Bingo Association's Compliance Committee, Executive Board and supports the IGRG industry training development team.

***Q3. What other factors should Government be considering to ensure the correct balance in gaming machine regulation? Please provide evidence to support this position.***

We would welcome recognition of the changes in non-cash payment debit card technologies on gaming machines. Such a change would have several benefits:-

- It would bring us into line with the rest of the business world
- It would improve our options to develop more effective player tracking systems
- It would reduce industry costs associated with changes to currency, e.g. the introduction of the £1 coin, £5 note etc.

We would also expect that any changes considered by any review would be fact-based.

We would work closely with government and the commission to ensure this was introduced with clear guidelines and controls to ensure problem gambling is at the forefront of our monitoring.

In Bingo we feel we control our Bingo Halls and persons who enter in a diligent manner.

All our premises are membership entry, our primary purpose for customers to visit us is Bingo (recent Ipsos MORI research supports that the most gambling activity in a Bingo Club is playing bingo 83%), we have regular intervals during our sessions which ensure there are many breaks in machine gaming, and we pride ourselves on being a safe leisurely environment.

Whilst we are largely a Gaming business we are also a place where our customers come to enjoy a sociable evening out, entertainment and benefit from the community spirit and support we have in our premises.

***Q4. What, if any, changes in the number and location of current gaming machine allocations support the Government's objective set out in this document? Please provide evidence to support this position.***

As previously indicated in our response to question 1, we do not see a need for any changes to the current number and location of gaming machines.

***Q5. What has been the impact of social responsibility measures since 2013, especially on vulnerable consumers and communities with high levels of deprivation?***

The main impact has been an increase in focus in the area of social responsibility throughout the gambling industry and a review of the way in which such measures were implemented previously.

Statistically bingo remains a low risk activity.

Recent data released by Gamcare shows that 99% of the calls they received were not from our sector. This is not to say we will not focus on our sector but we believe the Government and the Commission's focus should be more weighted towards the sectors where the problems are.

Of some 7,000 gaming disputes referred to IBAS in 2016, only 2 related to bingo.

Since 2013, there have been several social responsibility initiatives instigated by the bingo industry since 2013.

- A "test-purchasing" scheme designed to check clubs' compliance with social responsibility requirements in respect of permitting under-18s into our clubs using the 'think 21 policy'. We at Gala Leisure introduced this of our own volition in 2010.
- A national self-exclusion scheme enabling problem gamblers to self-exclude from all UK bingo clubs.
- The commissioning of the first problem gambling research into bingo carried out by IPSOS MORI. This will be used as the basis of further actions in 2017/18, i.e. an independent review of our self-exclusion scheme and an examination of problem gambling levels.

***Q6. Is there anything further that should be considered to improve social responsibility measures across the industry? Please provide evidence to support this position.***

We consider that continuous monitoring of our systems will ensure they are and remain fit for purpose.

Such activities include:-

- Evaluation of our social responsibility messaging through the IGRG to improve awareness amongst problem gamblers of where they can find support.
- Working with the relevant work streams to address an 'industry' standard training programme to suit all levels of our employees on social responsibility.
- Identification and evaluation of measures introduced to enable early intervention with problem gamblers. We are already in the process of developing a system to monitor

electronic bingo terminal players in a similar way to our machine-play monitoring system.  
(See question 5 for outputs).

- Implementation of account based play.

***Q7. Is there any evidence on whether existing rules on gambling advertising are appropriate to protect children and vulnerable people from the possible harmful impact of gambling advertising?***

We rarely advertise on television and when we do so we would not look to appeal to children or vulnerable people.

There is no evidence in any previous advertising carried out by Gala Bingo that would suggest it was not appropriate.

***Q8 Other relevant issues, supported by evidence that you would like to raise as part of this review but that has not been covered by question 1-7?***

We would like a greater appreciation of the differences between the various sectors in the gambling sector and the different risks associated with each type of product.

We are currently in the process of planning for the introduction of the new forms of currency. The cost to bingo clubs is estimated to be in the region of £15 million to convert 250,000 slots, as well as the introduction of various denominations of polymer notes.

We would like to see recognition of the disadvantage we face with the restriction on non-cash payment debit card methods for machines.

We feel that we are in danger of being left behind as such changes would be in response to customer demand and reflect what has become common practice to our customers in the majority of retail and leisure outlets.