
Amendments to social responsibility code provision 3.3.1 - responsible gambling information

Gambling Commission

RPC rating: validated

Description of proposal

In May 2015, the Gambling Commission amended Social Responsibility Provision 3.3.1 of its Licence Conditions and Codes of Practice (LCCP) for licensed operators. The changes require responsible gambling information to be: made available adjacent to ATMs in gambling premises; imparted via the best available method for each operator; and accessible in a form that may be taken away from gambling premises.

Impacts of proposal

The BIT assessment explains that all non-remote operators are in scope of the amendments, covering approximately 1,300 licences. On the basis that one manager from each operator would need to familiarise themselves with the updated document, and that the LCCP website directs them to those sections relevant to their licence type, the regulator estimates that two minutes are needed to read the additional text. Applying to this an hourly wage rate of a professional, uprated for non-wage labour costs, generates a total one-off familiarisation cost of £1,100.

In addition, the assessment notes that the LCCP amendments require businesses to provide existing responsible gambling information adjacent to all ATMs in gambling premises. As operators previously had to make this information available somewhere in their gambling premises, this is not expected to impose any significant costs on business. The amendments also require operators to consider the most effective ways to impart responsible gambling information and the most appropriate form to permit this information to be taken away from their premises. The assessment explains that operators were already required to use leaflets for this purpose, and that these changes were intended to allow the use of new forms of technology in the distribution of responsible gambling information. As these requirements are permissive in nature, they do not impose any significant direct costs on business.

Quality of submission

The Department has provided a proportionate level of evidence for the RPC to be able to validate an equivalent annual net direct cost to business of zero. The regulator has monetised the cost of familiarisation to non-remote operators, and has explained that the amended regulatory requirements either create a negligible additional burden on businesses or that they could be met by actions imposing no, or very low, cost. However, there are areas where the BIT assessment could be improved.

The assessment explains that the amendments affect all non-remote operators in scope, equivalent to approximately 1,300 licenses. However, the assessment also states that businesses may hold more than one operating license and that those who were members of the Association of British Bookmakers '*had already started to remove ATMs in line with the Association's code for responsible gambling*' (page 3), thereby excluding them from the change in ATM information requirements. The assessment would be improved through a clearer indication of how many businesses have been affected by this amended provision.

In addition, the assessment states that '*...the amendment sets out that material is to be made available adjacent to all ATMs, rather than being an additional regulatory burden*' (page 4). While the regulator has explained that information provision was previously required somewhere on gambling premises, the assessment would benefit from considering how many businesses were already placing this material next to ATMs specifically, and how costly the amendment would be for those who were not.

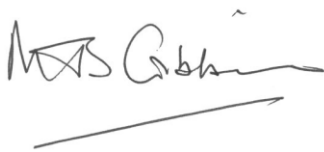
The regulator estimates familiarisation costs to gambling operators using the time it takes for each manager to read the LCCP changes. The assessment would benefit from making an adjustment to this familiarisation time to allow for operators' understanding of the amended requirements.

Departmental assessment

Classification	Qualifying regulatory provision
Equivalent annual net direct cost to business (EANDCB)	Zero
Business net present value	Zero

RPC assessmentⁱ

Classification	Qualifying regulatory provision (IN)
EANDCB – RPC validated	Zero
Business impact target score	Zero
Small and micro business assessment	Not required (fast track low-cost regulation)



Michael Gibbons CBE, Chairman

ⁱ For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000