

**IGT's response to DCMS Consultation on proposals for changes to Gaming Machines and Social Responsibility Measures** October 2017

Q1. Do you agree that the maximum stake of £100 on B2 machines (FOBTs) should be reduced? If yes, what alternative maximum stake for B2 machines (FOBTs) do you support?

No Comment - Don't Know

Q2..Do you agree with the government's proposals to maintain the status quo on category B1 gaming machines?

Yes

Q3..Do you agree with the government's proposals to maintain the status quo on category B3 gaming machines?

Yes

Q4..Do you agree with the government's proposals to maintain the status quo on category B3A gaming machines?

Yes

Q5..Do you agree with the government's proposals to maintain the status quo on category B4 gaming machines?

Yes

Q6..Do you agree with the government's proposals to maintain the status quo on category C gaming machines?

Yes

Q7..Do you agree with the government's proposals to maintain the status quo on all category D gaming machines?

Yes

Q8. Do you agree with the government's proposals to increase the stake and prize for prize gaming, in line with industry proposals?

Don't Know - Not applicable to IGT

Q9. Do you agree with the government's proposals to maintain the status quo on allocations for casinos, arcades and pubs?

We accept the government position.

Q10. Do you agree with the government's proposals to bar contactless payments as a direct form of payment to gaming machines?

Yes

Q11. Do you support this package of measures to improve player protection measures on gaming machines?

*In respect of B1 machines and the UK casino environment:*

IGT supports the introduction of such measures to improve player protection as part of our own corporate and social responsibility program and also recognise that addressing government and public concern on these issues is a key step toward improved machine allocations within the UK B1 casino sector.

We do have concern however about the detail of these measures and how that detail will affect both the cost of implementation and where responsibility for that cost will lie. IGT has participated in Responsible Gaming schemes around the world with similar elements to some of the measures proposed and has considerable experience in the design and implementation of the interfaces and systems to support such RG interventions. To that end, we would encourage further discussion with ourselves and the wider B1 machine sector to ensure an effective and practical approach is specified.

Examining the individual measures in the consultation:

#### *5.8.1 (Setting of voluntary time and spend limits)*

A form of this has already been implemented throughout the B2 sector. A similar approach in B1 is potentially a very costly exercise given the number of different independent platforms and games deployed and the need for a largely manual roll out. The consultation paper also recognises that take up of this feature has been 'negligible' in B2. Given the cost, it is not rational or constructive to make this a mandatory requirement within B1 until or unless a more effective method is identified.

The architecture employed throughout the UK B1 casino sector for machines and the corresponding casino management systems broadly follows the international casino model utilising GSA standards (Global Standards Association). This is very different to the architecture of UK B2/B3 machines and the way they operate. It is important therefore that any proposed requirements should take this into account and while the overall objectives may be similar across all Category B sectors, the most suitable specification, with its implementation and interfaces is likely to be different between B1 and B2/B3.

More specifically, a 'machine based' implementation – such as that presently deployed in B2 - is simply aimed at single play sessions and takes no account of the player's history on a machine, other machines or other visits to the casino.

A 'system based' approach where the casino management system (or player tracking system) is able to monitor these aspects may prove both more pertinent and cost effective.

*5.8.1 'Hard stops' when limits are met, i.e. the ending of sessions, should also be considered as an accompanying measure*

*5.8.2 Mandatory alerts when certain time and spend benchmarks are reached should be trialled*

These are relatively straightforward to implement once an acceptable method of limit setting has been established. The desirability and practicality however are questionable in a 'machine based' solution as they are easily circumvented. At best these provide a pause for thought.

*5.8.3. Prohibiting mixed play between B2 and B3*

This is not presently relevant to the B1 market that IGT supplies.

*5.8.4. The utilisation of algorithms to identify problematic play*

This is an interesting area, but is not something where we have expertise to contribute.

*5.9 Introducing a form of tracked play on B1, and sharing data with appropriate agencies*

IGT supports this proposal, but recognises that the development and operational responsibility for this lies largely with others. Much of the infrastructure to track play is already in place with Casino Management Systems ('CMS') - at least for carded players. Anonymous play is more challenging.

And of course, not all casinos operate a CMS. As this measure is proposed largely to acquire research data, it would be sensible to make this aspect non-mandatory for smaller operators.

Q12. On the whole, do you support this package of measures to improve player protection measures for the online sector?

Yes

Q13. Do you support this package of measures to address concerns about gambling advertising?

Yes

Q14. Do you agree the Government should consider alternative options including a mandatory levy if industry does not provide adequate funding for RET?

Don't Know

- a mandatory levy may not be sufficiently flexible to adjust with changing needs in RET. Possibly consult further when current research is finalised.

Q15. Do you agree with our assessment of the current powers available to local authorities

Don't Know