



## **Consultation on proposals for changes to Gaming Machines and Social Responsibility Measures**

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?

Members of The Bingo Association do not have any entitlement to B2 machines and therefore have no formal position to take, however the delay in resolving this issue has caused immense frustration to BA members around the level of reputational damage caused by the debate to other parts of the Gambling industry including Licensed Bingo Premises.

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

The Bingo Association does not have an entitlement to B1 machines and therefore has no formal position.

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

Yes, The Bingo Association is in agreement.

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

The Bingo Association has no comment to make

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

Yes, The Bingo Association is in agreement.

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

Yes, The Bingo Association is in agreement.

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

Yes, The Bingo Association is in agreement, however it did ask for the opportunity to discuss and review category D sub – classifications with a view to simplification. It seems a bit anomalous to have five category D classifications at the lower end of the scale when the rest of the gaming machine categories put together only have six.

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

Yes, The Bingo Industry is in agreement although our understanding is that this proposal is specifically for the benefit of under 18's.

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

The Bingo Association has no formal position on this question.

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

No. In the consultation document, DCMS gave no credible reasons why it would not consider The Bingo Association's proposal to work with the Gambling Commission to discuss how contactless payments could be made in a way that protects the consumer. This would involve creating a code of conduct to ensure social responsibility protections while being able to use the technologies that are rapidly becoming the dominant form of payment.

It is hard to reconcile the DCMS' view that the use of cash "gives players more control over their play", while the Gambling Commission states that the use of anonymous cash is dangerous and gives rise to harm. In summary – any principle describing innovation and change as a 'backward step' is concerning to an industry that desperately needs to innovate and meet future challenges.

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

The Bingo Association supports the government's proposal that the industry trial and evaluate improved player protections on gaming machines. The only area where The Bingo Association would be more cautious is around 'tracked play' however the proposals are at this stage are quite vague so BA will keep an open mind. Nevertheless, we would like to remind DCMS that bingo clubs have built in protections such as membership, regular breaks from play during bingo sessions, high staff to customer ratios which, coupled with improving levels of training and know your customer (KYC), already provide tools for protection. The bingo club customer in general is not a high adopter of technology; however, BA will support Gambling Commission requests for further information on this idea.

Q12. Do you support this package of measures to improve player protection measures for the online sector?

The Bingo Association has no formal position on this question.

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

The Bingo Association is in agreement with these measures.

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

The Bingo Association believes there are other actions that could be pursued first, instead of immediately introducing a statutory levy. The Gambling Commission could and should name and shame operators who fail to comply with their obligations under the LCCP, for example those operators who fail to make their appropriate contribution to RET, (which is also a requirement of the LCCP) should have their details (and shortfall) published. Therefore, BA does not necessarily agree with a compulsory levy especially in the absence of any understanding of the criteria likely to be used.

BeGambleAware is not the only suggested recipient of funding intended for the use of RET in gambling. All Gambling Commission calculations/assumptions should not necessarily be based solely on BeGambleAware's reporting but should include all donations. Also the guidance and procedures for donating via Be GambleAware could be improved. However, it is fair to recognize they are far better than in the days of RIGT.

The BA would recommend making it clear that all donations or pledges are made on the previous year's reported accounts rather than now where operators tend to wait for current year accounts to be finalized before judging their donations. Otherwise you are asking them to guess. BA believes donations/pledges should be given per license held not by operating company so it is clearer what element of a company

donation relates to which set of businesses and of course BA believes any reporting on donations should include non BeGambleaware donations.

Having said that The BA Code of Conduct insists members donate preferably to BeGambleAware and are making every effort to ensure this is complied with and fully supports the need to meet industry obligations.

The introduction of a statutory levy would also have the effect that it would only apply to licensed operators, thereby removing the possibility of a receiving monies from peripheral businesses who currently make a voluntary donation. A levy could mean that operators might lose direct engagement and relationships with the work undertaken by harm prevention charities engaged in research, education and treatment.

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

The Bingo Association agrees with this assessment.

Q16. Are there any other relevant issues, supported by evidence, that you would like to raise as part of this consultation but that has not been covered by questions 1-15?

The Bingo Association would like to return to the certainty of the Triennial review taking place every three years, to give it the opportunity to collect evidence which is timely and relevant.

The Bingo Association is concerned that the opportunity may still exist for B3 Gaming machine content to be played at B2 stakes (depending on where the review ends up) creating a potentially more attractive product to players in other types of premises. B3 games are instantly recognisable in Bingo Clubs and arcades at £2 stake £500 prize. This discrepancy leads to uncertainty and inconsistency about how much games cost to play.

The BA would advocate product parity across games content – so similar content, similar category.

BA notes and agrees the point 5.8.3. on mixed content.

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The Bingo Association