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Department for Digital, Culture, Media & Sport
100 Parliament Street
London
SW1A 2BQ

Dear Sirs,

Re: Consultation on proposals for changes to Gaming Machines and Social Responsibility Measures

Following a meeting in November 2017 of the All Party Parliamentary Group For Non-Profit Making Members' Clubs, discussions have been conducted concerning a proposed response to the above consultation.

Ideally this response would be made on behalf of the CORCA Group (Committee of Registered Club Associations) the umbrella group for all social clubs in the UK. Unfortunately, it has not been possible to coordinate a formal response to the consultation before the closure date of 23rd January 2018, due to existing commitments.

Nonetheless, the Working Men's Club & Institute Union Ltd (CIU) feels that it is appropriate to respond to the consultation which is submitted unilaterally and in its own right. The purpose of this covering letter is to qualify the answers to some of the On-Line Survey questions, reproduced as an annex to this letter and submitted on behalf of the CIU before the deadline expiry.

We feel that in the absence of participation in the previous consultation, areas of response to the on-line survey for the 2017 consultation are deserving of special comment as set out within the annex attached.

We trust that the information provided is of use and properly qualifies and characterises the ethos of Social Clubs in the absence of more formal data which was not submitted to the previous consultation. Should you require any further information or input please do not hesitate to contact me. My contact details are below.

Yours Faithfully


George Dawson CMD
President CIU

Email: 

ANNEX

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?

Yes

As clubs do not host these types of machines, the CIU does not regard it as appropriate to recommend a specific maximum stake. It is viewed by the CIU that socially responsible gambling of the type available within clubs, where gambling by fellow members is subject to peer-group scrutiny, does not apply in casinos and likeminded venues, therefore some reduction in stakes is desirable.

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

Yes

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

Yes

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

Yes

B3A and B4 machines are exclusively available within not-for-profit making private members clubs and represent the mainstay of responsible gambling within these institutions. In the absence of relevant submissions including data to allow proper assessment within this sector, the CIU agrees that the status quo should be maintained as proposed.

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

As above

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

Yes

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

Yes

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

No

It is important both for the preservation of traditional offerings within private members clubs as well as the financial well-being of existing clubs, already under extreme economic pressure; to continue to remain competitive within the Prize Gaming sector and to run bingo as a prize game. This is unaffected by the proposal.

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

Yes

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

Yes

We agree that the use of contactless credit and debit cards will only lead to further proliferation of irresponsible gambling and potential fraud.

Q.11 Do you support this package of measures to improve player protection measures on gaming machines?

No

CIU takes the view that within the club sector sufficient scrutiny and supervision of gambling already exists and tracked play will cause antagonism within memberships, will be resisted by certain members and will be offensive to the principles of data protection in a sector where membership names and addresses are recorded.

Q.12 Do you support this package of measures to improve player protection measures for the online sector?

Yes

Q.13 Do you support this package of measures to address concerns about gambling advertising?

Yes

Q.14 Do you agree the Government should consider alternative options including a mandatory levy if industry does not provide adequate funding for RET?

No

There are already sufficient financial burdens on clubs to suggest that if a mandatory levy is applied this will have a further detrimental effect on club survival within the UK. Please note the CIU currently pays a voluntary contribution to Gamble Aware.

Q.15 Do you agree with our assessment of the current powers available to local authorities?

Yes

Based on experiences in clubs around the country, the CIU do not believe that the application of monitoring and enforcement of compliance should be left to the vagaries, inconsistencies and individual discretions of local authorities. Accordingly, we agree that responsibility for the application of the rules should remain at national level through the Gambling Commission and other bodies and that Local Authorities already have more than sufficient influence through the licencing regime.

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?

Yes

- 1. Bingo Duty – clubs currently must ensure they do not exceed the maximum of £2,000 per week in stakes/prizes. Those wishing to exceed this limit need to apply for a bingo operating licence. It has been 12 years since this matter was reviewed and the CIU considers that an increase to £4,000 would be appropriate given the low risk levels already noted in the previous consultation for this type of activity (ref paragraph 3.24). The CIU also believe that given its culture and background a competitive advantage should be present between the exemption limit for clubs as opposed to public houses, which should remain at £2,000.*
- 2. Over 25's – As a potential solution to the well documented problems with casino based B2 (FOBT's) the CIU cite their experience with responsible alcohol purchasing and the implementation of a similar Drink Aware scheme preventing participation by those under the age of 25 years by insistence of proof of age.*