

**Department for Digital, Culture Media & Sport**  
**Consultation on proposals for changes to Gaming Machines and Social Responsibility Measures**

Response to questions raised in consultation on behalf on the London Borough of Sutton

**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?**

The council acknowledges that B2 gaming machines are important to the viability of betting shops, however we are concerned with the impact of these machines in relation to gambling harm and addiction as demonstrated in the evidence put forward.

Although the overall number of betting shops within both the London Borough of Sutton (LBS) has, and continues to fall, we have seen a 'clustering' of betting shops in town centre locations. These new premises are, for the most part, larger, brighter and more prominent. It is not unusual to have located in one high street a number of licensed premises owned and managed by the same operator, all offering the maximum 4 B2 gaming machines. This allows a large number of machines to be available in a small location.

We believe a controlled licensed environment is the best location for gambling machines and that the monitoring of play and adequate staffing levels to do this is important. However the speed in which a machine can accept the current stake of £100 and the speed of play, along with staffing levels in betting shops, make this monitoring difficult to adequately carry out.

As such we support the reduction in the maximum stake of B2 gaming machines and agree with Option 4 in reducing the stake to £2.00. As demonstrated in the evidence provided as part of the consultation, lower stakes have not seen a reduction in use. We feel this further reduction helps to protect gamblers whilst ensuring they are not driven from a licensed and controlled environment. Players of the existing machines have accepted the lowering of the stake for non-registered play as evidenced, however large amounts of money can still be lost in a short space of time with a £50 stake and this is still of concern.

We also have concerns that the adoption of Option 4, reducing the maximum stake to £2 on all content will bring the machines in line with B3 gaming machines mainly located within Adult Gaming Centres and Bingo Halls. The evidence shows a significant impact on the vulnerable in using these machines. As such in supporting Option 4 we would further suggest B3 machines may need to be reduced to ensure the 'problem' is not simply transferred to different premises.

We further support the 'slowing down' of machines. Slowing the speed of play would ensure players have time to consider their actions before committing further funds.

Further we would suggest the tightening of controls surrounding the placement of machines in licensed premises. Operators still maintain there is no legal requirement to detail the location of machines on plans of licensed premises and that they can move them as they wish. Given the evidenced harm these machines cause and given the size and staffing of some licensed betting shops we believe a more proactive stance is required and the location of the machines should be clearly indicated on the plans attached to the licence and that before any change of the location takes place the local authority are consulted.

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

As LBS and RBK do not have Casinos we have no comment to make in relation to B1 gaming machines.

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

With the advancement in technology and the current conditions for both Adult Gaming Centre and Bingo premises licenses that permits the number of B3 gaming machines to be 20% of the total number of gaming

machines within a licence premises we have seen an increase in the total number of B3 gaming machines available. The main reason for this has been a move away from large free standing machines to tablets and similar devices. More of these 'machines' can be located within the licensed premises with the linked increase in B3 gaming machines that form the 20% rule. The evidence in the consultation shows a significant impact on the vulnerable in using these machines. Given these 2 factors we agree with the government's proposal to maintain the status quo on category B3 gaming machines. However if the Government were minded to reduce the stakes and prizes of B2 machines there may be a need to further reduce stakes and prizes of B3 machines.

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

We agree with the government's proposal to maintain the status quo on category B3A gaming machines.

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

We agree with the government's proposal to maintain the status quo on category B3A gaming machines.

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

We have concerns with the potential impact on players following any uplift on stakes and prizes in category C gaming machines and agree with the government's proposals to maintain the status quo. Although the number of category C gaming machines located within pubs and bars has fallen pubs are now seen as a more family friendly location. As such and given the lack of direct supervision there is an increased risk of children and vulnerable adults playing these machines.

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

We agree with the government's proposal to maintain the status quo on category D gaming machines.

Crane grab style machines are not advertised as gaming and can be easily seen as skill machines. Given the nature of the prizes available, for example cuddly toys, these types of machines are particularly attractive to children. Although there is no legal restriction on the age of the individual who can play the machine there locations and the lack of direct supervision means any increase in stakes and prizes would be of concern.

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

Given the controlled nature of prize gaming and the time that playing such games takes, for example prize bingo, we agree with the consultation that the activity is low risk and that stakes and prizes could be increased.

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

We agree with the government's proposals to maintain the status quo on allocations. In relation to any proposal to increase the number of gaming machines permitted through the automatic entitlement in pubs from 2 to 4 we are in support of the Government's view to reject this. There is already a process via gaming machine permits to obtain more gaming machines should the premises adequately address the risk of increased gambling opportunity.

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

Any change in the current rules that prohibit credit and debit card payments via gaming machines would be of great concern. The mechanism of inserting cash into a gaming machine slows the process of gaming and ensures consideration is given to the amount being spent.

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

We support the proposed package of measures to improve player protection measures on gaming machines. We agree there is a need for further research and information to properly inform future decisions. We believe there is a need to extend social responsibility measures across all B1, B2 and B3 gaming machines.

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

We are no comments to make in relation to the online sector

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

We are no comments to make in relation to the online sector

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

We agree further studies into gambling in its various forms is important and that this should be funded by the industry.

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

We do not agree with the assessment of the current powers available to local authorities. Local Area Profiles are a good tool for informing premises of issues within the borough, however we do not feel they help a local authority to address the cumulative impact of clustering. We also have a concern that there is still an assumption within the Gambling Act 2005 to permit gambling.

Cumulative Impact Assessment (CIA) and the ability for a local authority to further define the total number of licensed premises within a geographical area would be welcome where the local authority can prove the need for one. This would balance the current assumption to permit gambling

**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?**