

**Department for Digital, Culture, Media and Sport  
Consultation on proposals for changes to Gaming Machines and Social  
Responsibility Measures October 2017**

**Swale Borough Council Response – January 2018**

Question	Response
<p>1. Do you agree that the maximum stake of £100 on B2 (FOBT's) should be reduced?</p> <p>If yes, what alternative maximum stake for B2 machines (FOBT's) do you support?</p>	<p>Swale BC is satisfied that it's Statement of Licensing Policy together with current legislation is as robust as it can be in protecting the young and vulnerable of the borough against gambling related harm. It does however recognise that Category B2 (FOBT's) gaming machines provide a particular risk to the public in that a large amount of money can be lost in a relatively short amount of time and that the nature of the gaming machines themselves mean that vulnerable people can become easily addicted to them.</p> <p>Having taken into account protecting the vulnerable within the wider community whilst at the same time balancing the business needs of the gambling industry who contribute to the continuing growth and vibrancy of its towns Swale BC nevertheless supports a reduction in the stake for B2 (FOBT's).</p> <p>We consider that Option 3 would be an appropriate stake for B2 machines.</p>
<p>2. Do you agree with the government's proposals to maintain the status quo on category B1?</p>	<p>Swale borough does not have a casino within its boundaries so on a local level does not have any evidence either factual or anecdotal on which to base a response to this proposal.</p> <p>The Council does however recognise that casinos are extremely well run and regulated and does not think that the current stake of £5 is <del>not</del> excessive for category B1 machines.</p>
<p>3. Do you agree with the government's proposals to maintain the status quo on category B3?</p>	<p>Swale BC is happy to support the Government's proposals to maintain the status quo on category B3 machines unless and until there is substantial evidence provided by the gambling industry to support an increase in the stakes for these machines that will not impact on player protection.</p>
<p>4. Do you agree with the government's proposals to maintain the status quo on category B3A?</p>	<p>Swale BC is happy to support the Government's proposals to maintain the status quo on category B3A machines unless and until there is substantial evidence provided by the gambling industry to support an increase in the stakes for these machines that will not impact on player protection.</p>

5. Do you agree with the government's proposals to maintain the status quo on category B4?	Swale BC is happy to support the Government's proposals to maintain the status quo on category B4 machines unless and until there is substantial evidence provided by the gambling industry to support an increase in the stakes for these machines that will not impact on player protection.
6. Do you agree with the government's proposals to maintain the status quo on category C?	Swale BC is happy to support the Government's proposals to maintain the status quo on category C machines unless and until there is substantial evidence provided by the gambling industry to support an increase in the stakes for these machines that will not impact on player protection.
7. Do you agree with the government's proposals to maintain the status quo on category D?	Swale BC is happy to support the Government's proposals to maintain the status quo on category D machines unless and until there is substantial evidence provided by the gambling industry to support an increase in the stakes for these machines that will not impact on player protection.
8. Do you agree with the government's proposals to increase the stake and prize for prize gaming, in line with industry proposals?	Swale borough has several seaside town that rely heavily on amusement arcades that provide prize gaming. Several of these businesses have closed in recent years and the Council is keen to ensure that those that remain continue to be viable. There is not enough evidence that prize gaming contributes to gambling related harm and therefore the Council supports the proposal to increase the stake for prize gaming in line with industry proposals.
9. Do you agree with the government's to maintain the status quo on allocations for casino's, arcades and pubs?	Yes. Swale BC agrees that the status quo should be maintained until such times as the outcome on category B2 machines has been decided. With regards to pubs there is sufficient ability within current legislation for an increase of category C and D machines within any particular licensed premises
10. Do you agree with the government's proposals to bar contactless payments as a direct form of payment to gaming machines?	Yes. Swale BC agrees that if contactless payments were permitted as a form of payment it would be a backward step in the protection of vulnerable players and therefore should not be permitted.
11. Do you support the package of measures to improve player protection measures on gaming machines?	Yes. It would appear from the consultation document that much work is being carried out by the Gambling Commission and the industry to improve player protection on gaming machines which Swale BC supports
12. Do you support this package of measures to improve player protection measures for the online sector?	Yes. It would appear from the consultation document that much work is being carried out by the Gambling Commission and the industry to improve player protection for online gaming which Swale BC supports

13. Do you support this package of measures to address concerns about gambling advertising?	Yes. It would appear from the consultation document that much work is being carried out by the Gambling Commission and the industry to address concerns about gambling advertising which Swale BC supports
14. Do you agree the Government should consider alternative options including a mandatory levy if industry does not provide adequate funding for RET (Research, Education and Treatment)?	Yes. Swale BC agrees that if the gambling industry does not voluntarily provide sufficient funds for RET then the Government should levy a mandatory fee to ensure that player harms are reduced
15. Do you agree with our assessment of the current powers available to local authorities?	Yes. At the moment current powers appear to be sufficient to allow gambling applications to be considered properly on a case by case basis. The change in planning laws has helped.
16. 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 question 1-15?	Whilst Swale BC has responded that it supports Option 3 for Question 1 we would like to propose a £10 maximum stake to differentiate from the lower stake category C and D machines but consider that a £20 stake is too high.