

Government response to consultation on proposals for the introduction of a maximum stake limit for online slots games in Great Britain

Executive summary

Following the Department of Culture, Media and Sport's (DCMS) review of the Gambling Act 2005, the gambling [white paper](#) published in April 2023 set out the government's plans for modernising the regulation of the gambling sector.

One of the key proposals in the white paper was the introduction of a maximum stake limit for online slots games. This aligns with the review's overarching objectives, ensuring an equitable approach to the regulation of remote and land-based gambling, and responding to the evidence of specific risks of harm associated with high stakes play on online slots games.

Following a public [consultation](#), which ran from 26 July to 4 October 2023, and analysis of the responses to the consultation, the government will introduce a statutory maximum stake limit of £5 per spin for adults aged 25 and over. We will also introduce a statutory maximum stake limit of £2 per spin for young adults aged 18 to 24, who the evidence suggests are associated with higher rates of gambling-related harm and may have a greater risk tolerance compared to other age groups. We believe these limits will achieve the government's stated objectives of reducing the risk of gambling-related harm, with a lower risk of unintended consequences and less disruption to the majority of gamblers who do not suffer harm.

The imposed limit should serve as a maximum stake which customers can choose to stake up to, rather than as a new default which operators drive customers towards, or which is otherwise seen as objectively 'safe'. Operators currently offer stakes from as little as one penny per spin, and we would expect a range of staking options far below the maximum to remain available.

These slots stake limits will build on existing protections and controls for those who gamble through online slots games and will work alongside other measures outlined in the gambling white paper such as financial risk checks, data sharing on high risk customers, and making online games safer by design.

2023 consultation

From 26 July to 4 October 2023, DCMS publicly consulted on proposals for a stake limit for online slots games. The purpose of this consultation was to ensure that the government was able to consider the best available evidence, including on the impact of each option, when finalising policy decisions. Alongside the consultation, we published a consultation stage impact assessment to help inform responses.

The consultation sought views on:

1. the introduction of a stake limit of between £2 and £15 per spin;
2. slot-specific measures to give greater protections for young adults aged 18 to 24; and
3. details to support the effective implementation of the policy, including the meaning of 'online slots games', 'maximum stake' and 'spin/game cycle'.

We received 98 responses to the consultation, including 46 individual respondents and 52 from organisations. Two organisations submitted 2 responses each so these have been combined and treated as one response. Organisations who responded included 1 from academic institutions; 12 from local authorities / licensing boards; 21 from gambling industry companies and their representatives; 11 from charities, campaign groups and treatment providers; 2 from parliamentary groups; and 3 from organisations who did not specify the nature of their organisation. Individual responses included 6 individuals working in gambling or gambling regulation and 3 academics or researchers. We are grateful to all those who responded to the consultation.

There were some clear themes amongst the responses, notably that online slots are a high-risk gambling product and that statutory stake limits are necessary to reduce

the risk of gambling-related harm. Many respondents felt that a stake limit for online slots should align with the stake limits available on gaming machines in land-based gambling settings, although there was disagreement on the appropriate analogue given other factors associated within online play. Respondents also highlighted the importance of retaining consumer choice and the risk of consumers moving to the illegal online market if they are no longer able to stake at their preferred levels.

Next steps

Gambling policy is substantially reserved in Scotland and Wales but devolved in Northern Ireland. This consultation relates to online slots games provided and/or advertised to customers in Great Britain, by operators who are consequently required to hold the appropriate licence from the Gambling Commission.

This response provides remote gambling operators with clear notice of our intention to introduce stake limits at the specified levels. Following publication of this response, draft regulations will be drafted and laid before Parliament as an affirmative statutory instrument, alongside a regulatory impact assessment. If approved by Parliament, these will impose new licence conditions on remote gambling operators which the Gambling Commission will then be responsible for enforcing.

Following the passing of the secondary legislation, we expect there to be a minimum of 6 weeks' transition period for operators to introduce a £5 stake limit for all customers. We will then allow a further 6 weeks for the development of any necessary technical solutions before we expect the lower stake limit of £2 for young adults aged 18 to 24 to be in place. This phased approach gives acknowledgement to the development of any technical solutions by operators which may be required for age-based limits. Following this transition period, if operators are unable to develop solutions to adequately distinguish between customers who are 25 and over and those who are under 25, the expectation is that they will not be able to offer any customers stakes exceeding £2 per spin.

Introduction

In April 2023, DCMS published the [white paper](#) on gambling setting out the government's plans for bringing the regulation of the gambling sector into the digital age. It set out over 60 evidence-based proposals to respond to the risks and opportunities which have emerged since the Gambling Act 2005.

One of the key proposals in the white paper was the introduction of a maximum stake limit for online slots games.

In Great Britain, there are currently no statutory limits on the amount people can stake on any online gambling products. This is in contrast to the land-based sector, where electronic gaming machines (offering games which are otherwise similar to online slots games) are subject to stake and prize limits in legislation. There are no statutory limits on in-person betting or other gambling products such as table games in land-based casinos.

As set out in the [white paper](#) and the July 2023 [consultation](#), there is strong evidence of product-driven risk from online slots games, which is likely to be exacerbated by the ability for operators to offer theoretically limitless stakes. In line with the [formal advice from the Gambling Commission](#) and the general weight of evidence, the government has committed to introducing a maximum stake limit for these games to minimise the risk of runaway or rapid losses which can contribute significantly to gambling-related harm. This measure is designed to work together with the wider package of policies in the white paper, including financial risk checks, data sharing on high-risk customers, and making online games safer by design.

To finalise policy details, including the precise level at which a stake limit should be set, the government conducted a public consultation exercise from July to October 2023. During this time, 98 submissions were received, including 4 by email and 94 via our survey platform. Two organisations submitted 2 responses each so these have been combined and treated as one response. Respondents ranged from industry stakeholders engaged across various stages of the gambling supply chain, stakeholders from charities and campaign groups, other interested organisations such as parliamentary groups and individual members of the public. A list of

responding organisations who agreed to attribute their response to their organisation is included in Annex A. In addition, we received the results of a survey of 3,898 members of the campaigning organisation 38 Degrees, and a petition set up by the charity Gambling With Lives (GWL) signed by 12,775 people. All responses submitted were reviewed and taken into account in considering next steps.

Parts 1 to 4 of this document sets out respondent views and evidence on each section of the consultation before outlining the government response and intended action in each area. The 'summary of consultation responses' including the figures and percentages in each section reflect only the respondents who engaged with each specific question, rather than the overall respondent body.

Overview of previous evidence and research

In addition to the views and evidence provided through the consultation, DCMS has considered a wider body of background information to guide decision making. This includes academic research, parliamentary reports, and findings from the stake limit cut on B2 machines (fixed odds betting terminals) in 2019. Further specific consideration was given to the below:

Gambling Act 2005 review call for evidence respondents

In December 2020, the then Department for Digital, Culture, Media & Sport ran a 16 week [call for evidence](#) on the Review of the Gambling Act 2005. The call for evidence asked 45 questions across the full range of gambling regulation, including online protections, advertising, consumer redress, and land-based gambling.

Question 2 of the section 'Online protections - players and products' specifically asked for evidence for or against the imposition of greater controls on online product design, including stake, speed, and prize limits or pre-release testing. Many of the 16,000 call for evidence respondents addressed this issue, and specifically supported the introduction of a maximum stake limit for online slots games. Respondent views were summarised in the [white paper](#). Given the number of respondents to the call for evidence, we have continued to consider their views where relevant to the current consultation.

Data from operators

As outlined in the [white paper](#), a data request to industry in April 2021 alongside the review call for evidence provided important insight into how stake sizes are associated with harm, as measured by operator-assigned risk scores as the best available proxy. This highlighted the overrepresentation of customers identified as high risk among high stakers, although this data could not explore the cause of such overrepresentation. However, it also found that even players identified as high-risk play mainly at low stakes. The [white paper](#) gave fuller consideration to the data, including its limitations. We note that distributions may have changed as operators' algorithms and approaches (including voluntary slots stake limits) have continued to evolve.

To inform the consultation and consultation stage impact assessment, DCMS formally requested data from leading operators. This data covered over 70 billion spins placed during the financial year to March 2023, increasing our understanding of current staking patterns for online slots. The data showed that high stakes are a very small percentage of all spins. Stakes over £5 comprised 0.06% of all spins and stakes over £20 comprised just 0.02% of all spins. This staking data was included in the consultation to assist respondents in forming their own views.

Following publication of the consultation document, we received further information from operators on how staking patterns vary for young adults aged 18 to 24 and the frequency at which all adults stake over a certain level. The results of the data analysis showed that young adults have similar staking patterns to older adults. The primary difference is at staking levels over £10, which take up a lower proportion of overall stakes for young adults aged 18 to 24 than those 25 and over. However, 18 to 24 year olds placed a slightly higher proportion of stakes between £2 and £10, compared to older adults.

The data also showed that very few people stake at high levels for most of their slots gambling. Only 3.9% of those aged 25 and over staked over £2 for more than half of their spins, and just 0.7% staked over £5 for more than half of their spins. For young adults aged 18 to 24, just 2.1% staked over £2 for more than half of their spins and 0.4% staked over £5 for more than half of their spins. Industry data submitted in

response to the consultation highlighted that 38% of people stake over £2 at least once a year, and 20% over £5, but our new data suggests very few of these people stake at higher levels routinely.

Ahead of the consultation, we also requested data from Flutter, who introduced a maximum stake limit for slots games of £10 per spin across all of its brands in 2021. To inform our impact assessment, DCMS also gathered updated estimates from the Betting and Gaming Council on the familiarisation and implementation costs that would likely be incurred by industry as a result of the proposed measures. Alongside updated data from the Gambling Commission on the size of remote gambling licence holders split by size of workforce and number of licences held.

Stakeholder engagement

During the course of the Gambling Act Review and the specific consultation on online slots, government ministers and officials have continued to engage extensively with a range of stakeholders through roundtables, workshops and technical discussions on the proposals. This helped us understand in greater detail the landscape and informed our policy direction. We are grateful for the time and effort stakeholders committed to help inform and strengthen our policy position.

Regulator

The Gambling Commission recommended the introduction of stake limits for online slots in its published formal [advice to Government](#) in April 2023. DCMS has continued to work closely with the regulator in considering the appropriate stake level for online slots, and considering how any new limits will overlap with other measures being consulted on by the Gambling Commission.

Further, since March 2020, the Gambling Commission has been [collecting and publishing detailed information from online gambling operators](#). This includes a detailed breakdown of staking patterns with leading operators which represent approximately 80% of the online gambling market (but given size and product mix, they may not be fully representative of all online slots providers). The data for the

2022/23 financial year covers some 76 billion individual staking events (spins), and has helped inform DCMS analysis.

Part 1: The scope of limits

While stakeholders broadly recognise online slot-type products as a distinct class of remote casino game and have an intuitive understanding of the key terminology such as stake and game cycle, these terms are not all defined in legislation. To ensure the statutory instrument introducing the maximum stake limit is fully effective, we need to ensure a common understanding and also ensure the chosen definitions capture all intended products without driving unintended consequences. The consultation therefore proposed working descriptions and invited stakeholder views. Specifically, we provided the following descriptions and asked the following questions:

Online slots are “Remote casino games of a reel-based type (including games that have non-traditional reels or which combine elements of other games within a slot game mechanic).”

“‘Maximum stake per spin’ means the maximum amount a player can pay or risk per spin or game cycle.”

“A game cycle starts when a player depresses the ‘start button’ or takes equivalent action to initiate the game and ends when all money or money’s worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game.”

- 1) Does the description of online slots we have provided adequately describe the products intended for inclusion in the maximum stake limit’s scope?
- 2) Is the description of stake we have provided suitable for the purpose of the introduction of a maximum stake limit for online slots games?
- 3) Is the description of game cycle we have provided suitable for the purpose of the introduction of a maximum stake limit for online slots games?

Summary of consultation responses

Questions 1-3: Scope of limits

Online slots meaning

65% of respondents who answered this question agreed with the description of “online slots” proposed in the consultation. 22% of respondents did not agree with the proposed description. Some respondents considered the description to be too vague and therefore open to loopholes, while others felt that it was too restrictive. Many of those who felt the description was too vague expressed concerns that gambling operators could be incentivised to develop products which are functionally similar to online slots but might be argued to be technically exempt to circumvent stake limits.

Some respondents called for regular reviews of the description to future-proof its relevance to new online gambling products. A few respondents suggested that independent and accredited test houses should be responsible for classifying games rather than operators who may subjectively interpret whether a game meets the slots definition or not.

Some operators responding to the consultation raised technical concerns about the description, where the proposed wording extended the definition established by the Gambling Commission in 2021 in an effort to ensure boundary pushing products are captured. Respondents suggested that multiple definitions in legislation and regulation would cause confusion and technical challenges for the categorisation of games, as well as potentially unintentionally capturing games outside of scope of the limit. A frequently expressed opinion amongst industry respondents was to keep the description exactly aligned with the already established and widely understood Gambling Commission definition.

Maximum stake meaning

86% of respondents to this question agreed with the description of “maximum stake” proposed in the consultation. 7% of respondents did not agree with the proposed

description. Many of these respondents considered that the proposed description was unclear or open to loopholes and may result in inconsistent application of the stake limit, but did not give specific examples of how it might be circumvented.

Game cycle meaning

78% of respondents agreed with the description of “game cycle” proposed in the consultation. This description aligns with the definition used by the Gambling Commission’s Remote Technical Standards. 14% of respondents did not agree with the proposed description. These respondents disagreed for different reasons, with some saying it was unclear, others arguing it was too restrictive, and others saying it was not restrictive enough and might contain loopholes.

Our response

We welcome stakeholders’ general support for the descriptions proposed in the consultation.

We have considered feedback from respondents, including the concerns raised by operators in relation to the proposed description of “online slots” where the proposed wording extended the definition established by the Gambling Commission in 2021. We acknowledge the concerns that this wider description has the potential to unintentionally capture games outside of scope of the stake limit and the intention of the white paper.

As outlined in the white paper, we do not intend to introduce a maximum stake limit for online games other than online slots. However, the intention is that boundary-pushing products (such as those which combine fundamentally slots-type gameplay elements with other games like bingo - for instance the popular ‘slingo’ game) are captured under the definition of slots and subject to the stake limit. Having worked with the Gambling Commission, we are confident that these games can adequately be captured by the Gambling Commission’s existing definition, although this is ultimately subject to due legal process on interpretation.

We therefore intend that the description of 'online slots' in the statutory instrument will remain fully consistent with the Gambling Commission definition established in 2021. Following stakeholder support, we intend to proceed with the proposed descriptions of 'maximum stake' and 'spin/ game cycle' as set out in the consultation. If any of these descriptions prove too narrow to effectively deliver the policy intent, then both the government and the Gambling Commission will look to revise it. The following descriptions will be appropriately adapted for the statutory instrument to support the effective implementation of the policy:

Slots are "casino games of a reel-based type (includes games that have non-traditional reels)"

"Maximum stake per spin' means the maximum amount a player can pay or risk per spin or game cycle"

"A game cycle starts when a player depresses the 'start button' or takes equivalent action to initiate the game and ends when all money or money's worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game."

Part 2: Policy options for a maximum stake limit for online slots games to apply to all adults

In deciding the level at which the stake limit is set, the government is seeking to reduce the risk of harmful runaway losses with minimal unintended consequences.

In line with the white paper commitment, the consultation outlined 4 options for consideration. These were considered separately to the case for a lower limit for young adults, which is discussed in Part 3 below.

- Option 1 - a maximum online slots stake limit of £2 per spin
- Option 2 - a maximum online slots stake limit of £5 per spin
- Option 3 - a maximum online slots stake limit of £10 per spin
- Option 4 - a maximum online slots stake limit of £15 per spin

The consultation then asked the following questions:

4a) What maximum stake limit for online slot games would you support, if any?

4b) Please explain your answer, providing evidence where possible.

Summary of consultation responses

Question 4

By volume, most respondents would support a stake limit at the bottom of, or below, our consultation range for all adults. Respondents were provided with 6 answer options and responded as follows:

Response	% of respondents
Option 1 - £2	44%
Option 2 - £5	7%
Option 3 - £10	18%
Option 4 - £15	1%
None of the above	29%
I don't know	1%

When taking into account the content of the free text responses from each of the respondents, 26% of consultation respondents were in favour of a stake limit below £2 and 38% of respondents favoured a limit of £2. This figure is lower than that shown in the table above because some respondents selected £2 (Option 1) but explained in the free text response that they were in favour of a limit below £2. Many of those in support of a £2 limit (Option 1) felt that it was the option most likely to reduce average losses or to help minimise the risk of runaway losses and therefore have a significant effect in reducing gambling-related harm. Many respondents also felt that £2 was most appropriate as it aligned with the stake limit for B2 gaming machines in bookmakers.

In addition to the formal consultation responses, we also received survey results from 3,898 members of the campaigning organisation 38 Degrees and a petition set up by GWL signed by 12,775 people. Both petition and survey respondents wanted tougher restrictions, with the petition specifically calling for a limit below £2, and changes to slow down games (not in scope of this consultation).

In total, 26% of respondents were in support of a limit of £5 or higher. 24 of the 96 responses to this question were from gambling industry representatives, and nearly all argued for a £10 limit to 'strike a balance' between protection and freedom. Industry respondents suggested £10 online is proportionate to the £5 maximum in casinos due to the additional account-based monitoring available to online consumers. These respondents raised concerns that lower limits would affect customer enjoyment of online slots and that these customers may migrate to the illegal online market where there are no protections for consumers. A few respondents pointed to the blanket EUR 1 stake limit on online slots introduced in Germany in 2020 and expressed concerns about its impact on the German market.

1% of respondents were in support of a £15 limit (Option 4) and 4% of respondents did not support a stake limit at any level.

3% of consultation respondents felt online slots should be banned altogether and others suggested that stake limits should be based on the individual financial

circumstances of a customer. Some respondents called for additional measures not in scope of the consultation, including further action on advertising and game design.

Our response

We have committed to introducing a maximum stake limit for online slots games to minimise the risk of runaway or rapid losses which can contribute significantly to gambling-related harm. The latest evidence supports this intention, for instance with the latest [annual statistics from GambleAware](#) finding that of those receiving treatment for gambling-related harm from The National Gambling Treatment Service in 2022-23, over a third (37.9%) reported gambling on online slots as one of the top 3 gambling activities contributing to their difficulties with gambling.

In deciding which option to pursue, we have been led by the best available evidence and guided by the overarching objectives of the Gambling Act 2005 Review of ensuring an equitable approach to the regulation of online and land-based gambling.

After careful consideration, the government has decided to introduce a maximum stake limit of £5 per spin for online slots games for adults aged 25 and above. We believe that a £5 limit will achieve the government's stated objectives in a proportionate way, with a lower risk of unintended consequences such as displacement to the illegal online market. Around 20% of customers currently choose to stake over £5 on a spin at least once a year (so will be impacted by this measure), but only 0.6% of all spins are over £5.

We think that a £5 maximum stake for adults aged 25 and over will help to reduce harm because of the constraint on a player's ability to place very large stakes quickly. Moreover, it takes consideration of the structural differences between land-based in-person gambling and online play. A £5 limit aligns with the stake limit for B1 machines in casinos which we believe to be the most comparable land-based gambling environment in terms of risk. While online gambling, particularly via smartphone, is by far the most accessible form of gambling, it does afford meaningful protections which cannot easily be replicated offline. All online play is

account-based, and recent years have seen significant strides in the development of harm detection algorithms which monitor every aspect of a customer's gambling to spot signs of risk and trigger interventions without human input. Such account-based protections will be further strengthened by proposals for new obligations on operators to conduct checks to understand if a customer's gambling is likely to be unaffordable and harmful, in the form of frictionless financial risk checks. These would be triggered by £125 losses within a month regardless of the stake size. The Gambling Commission is also exploring improvements to online harm detection algorithms which will mean other markers of harm are more effectively identified and acted on.

This limit will apply to all slots games offered by licensed operators, and operators will under no circumstances be allowed to offer higher stakes on online slots games, even if customers can provide evidence of lack of harm or their ability to afford them. Our intention is that there will be future opportunities to review and if necessary adjust the limits. We also acknowledge the calls for changes to game design, specifically to slow down the speed of online slots games. Online slots games are already subject to a minimum speed of play of 2.5 seconds per spin (in line with land-based equivalents) as well as other measures designed to strengthen the protections and controls for those who gamble through online slots games.

Part 3: Considerations and policy options for protecting young adults using online slots

As outlined in the white paper and consultation, young adults can be particularly vulnerable to gambling-related harm, and are likely to be more vulnerable to the risks associated with high stakes online slots play.

The consultation outlined 3 options for additional protections for this group, in addition to the general limit considered above:

- Option A - a maximum online slots stake limit of £2 per spin for young adults aged 18 to 24
- Option B - a maximum online slots stake limit of £4 per spin for young adults aged 18 to 24
- Option C - applying the same maximum stake limit to all adults, but building on wider requirements for operators to consider age as a risk factor for gambling-related harm

The consultation then asked the following questions:

5a) What maximum stake, if any, do you support for young adults aged 18-24?

5b) Please explain your answer and reference any relevant supporting evidence if appropriate.

Summary of consultation responses

Question 5

There were a number of views on whether additional protections are needed for young adults and whether a separate lower stake limit should be implemented.

Respondents were provided with 5 answer options and responded as follows:

Response	% of respondents
Option A (a £2 stake limit for 18-24 year olds)	30%
Option B (a £4 stake limit for 18-24 year olds)	3%

Option C (consistent with the limit for all adults but with extra operator vigilance)	29%
None of the above	30%
I don't know	7%

30% of respondents selected Option A (a £2 stake limit for young adults 18 to 24) and 3% of respondents selected Option B (a £4 stake limit for young adults aged 18 to 24). The majority of these respondents had selected the same general limit in the previous question.

29% of consultation respondents selected Option C (a stake limit for young adults aged 18 to 24 that is consistent with the limit for all adults but with extra operator vigilance). Of these respondents, the majority supported a limit for all adults of either £2 or £10.

30% of respondents selected 'None of the above'. Of these respondents, the majority support a separate stake limit for young adults aged 18 to 24 that is £2 or below. A few respondents argued that young people should not be allowed to access online slots games.

Overall, the majority (60%) of respondents favoured a stake limit of £2 or under for young adults aged 18 to 24.

34% of consultation respondents were in favour of a universal limit of £2 across all adult age groups as the lowest limit within the consultation range. It is unclear how many of those who supported consistency in limits for all adults would support a lower limit for young adults if the general limit is to be higher than £2.

Many respondents cited evidence showing that young adults may be particularly vulnerable to gambling-related harm and felt that this justified greater protections either in the form of a separate stake limit or otherwise. Respondents also mentioned that younger adults may be less informed on the risks of gambling or may have lower

incomes than older adults. Conversely, other respondents felt that the evidence base was inconclusive.

Respondents who were not in favour of a separate limit raised concerns about some adults being treated differently based only on their age. These respondents argued that a separate limit could be unfairly discriminatory and provide a precedent for discrimination based on other protected characteristics. Others felt that a two-tier approach to stake limits would only serve to generate further disparity with the land-based sector where the same limits are consistent across all adults. A few respondents also suggested that an unintended consequence of a separate limit could be that young adults are particularly incentivised to gamble via the unlicensed sector in order to access higher stakes, potentially setting them up for a lifelong connection to the illegal online market.

Support for a separate limit among gambling industry respondents varied. Some noted that many gambling operators already offer additional protections for customers aged 18 to 24 such as restrictions on high-value customer schemes, lower deposit limits, and bespoke social media advertising requirements. Some suggested the existing safeguards for this cohort are sufficient (and will be further strengthened via financial risk checks) and that separate stake limits would be disproportionate and largely ineffective. However, some industry respondents were much more supportive of a separate age limit for young adults which recognises the particular risks for that cohort, and aligns with the broader aims of the white paper in protecting vulnerable groups.

Several industry respondents highlighted the challenges associated with implementing age-based limits across the industry's technical infrastructure. These respondents suggested that a separate stake limit for young adults would require extensive development by operators and software providers and would be far more complex and costly to implement than a universal limit. Several industry respondents suggested that implementation for a separate stake limit would take over 9 months. However, some industry respondents felt that a two-tier limit was still preferable to a universally low limit for all adults, despite the additional implementation challenges.

Our response

After considering the consultation responses, we have decided to introduce a stake limit of £2 per spin for young adults aged 18 to 24. We believe the evidence justifies increased protections for this cohort, including a separate lower stake limit. Young adults have the highest average problem gambling score of any age group, generally lower disposable income, ongoing neurological development impacting risk perception, and common life stage factors like managing money for the first time or moving away from support networks. In the Gambling Commission's participation survey, reporting on data in the year to March 2023, the problem gambling rate for 16 to 24 year olds (1%) was higher than the headline problem gambling rate (0.3%). There is also evidence of links between youth problem gambling and suicides. A [cross-sectional research study from 2021](#) found an association between suicide attempts in 16 to 24 year olds and problem gambling, even after adjustment for other factors. The researchers conclude that young people and young adults experiencing problem gambling should be considered at risk for suicidality.

A separate limit for young adults aligns with the wider government approach to gambling of targeted and evidence-based interventions for those at risk, while not unduly restricting others.

The consultation document set out our intention to give a minimum of 6 weeks transition period for operators to become compliant with the new rules. However, we acknowledge that the implementation of a separate stake limit adds a layer of complexity for businesses in making the necessary changes to software. We are therefore proposing a phased approach to implementation whereby we will give a minimum of 6 weeks transition period for operators become compliant with the general £5 stake limit rules and a further 6 weeks to allow for the development of any necessary technical solutions before enforcing compliance with the lower limit of £2 for young adults aged 18 to 24. Following this transition period, if operators are unable to develop solutions to adequately distinguish between customers who are 25 and over and those who are under 25, the expectation is that they will not be able to offer any customers stakes exceeding £2 per spin.

We agree that a robust evidence base is vital in informing intervention. We are grateful to the respondents who highlighted important evidence as part of their submissions. In addition, in the time since consulting, we have looked to build on our evidence base by formal data requests to industry and carrying out desk research. The introduction of a statutory levy on gambling operators will also ensure independent, long-term and trusted funding for high quality research to inform policy and regulation.

Part 4: Impact

The consultation was published alongside a consultation stage impact assessment to help inform respondent's views. A final stage impact assessment will be published alongside the publication of the statutory instrument. The consultation asked respondents to consider the impact assessment in relation to both businesses and customers (including those being harmed), and specifically:

6a) Are there any additional impact considerations, including on the assumptions in the accompanying impact assessment, or on the risk of unintended consequences?

6b) Please explain your answer and provide relevant evidence. We would particularly welcome input on transition costs, and on the impacts for small and micro businesses.

7) Please indicate if you believe any of the proposals in this consultation are likely to impact persons who share such protected characteristics and, if so, please explain which group(s) of persons, what the impact on any such group might be and if you have any views.

8) Are there any other factors or points you wish to highlight that have not been considered above?

Summary of consultation responses

Question 6

More than half (52%) of respondents answered "Yes" to the question "Are there any additional impact considerations, including on the assumptions in the accompanying impact assessment or on the risk of unintended consequences?". There were a variety of views on what these additional impacts or unintended consequences were. Many of the comments and supplementary evidence focused on the positive impact of a stake limit on those either directly or indirectly affected by gambling-related harm. Many of these respondents felt that a reduction to the industry's Gross Gambling Yield (GGY) does not necessarily mean a net negative impact on the economy overall because of the reduction in costs to individuals affected by gambling-related harm and associated public sector costs, including at a local level.

A similar number of respondents focused on the cost to the gambling industry and raised concerns about the displacement of customers to the illegal online market as a result of the introduction of stake limits. Industry respondents expressed concerns about the impact of a stake limit on innovation within games. Some industry respondents highlighted that a single stake limit would be easier to implement than 2 separate limits. Several industry respondents provided suggestions for the length of time required to implement stake limits. Most advocated for a minimum implementation period of 6 months and suggested that a longer period would be required for age-based stake limits.

A few respondents noted the possibility of unintended consequences such as changes in gambling behaviour which may enhance the risk of gambling-related harm, e.g. longer session length, playing on multiple gambling sites, and expressed concerns about reliance on operator vigilance in tackling gambling-related harm.

Question 7

There were a variety of views on whether the proposals are likely to impact persons who share protected characteristics, as set out in the Equality Act 2010.

23% of respondents highlighted that young people will be discriminated against on the basis of age if a separate lower stake limit is implemented. Some respondents felt that this discrimination would be unfair and put young adults at a disadvantage when gambling online. However, the majority of these respondents felt that younger people needed to be protected because of their increased risk of harm. Similar arguments were made for other groups with protected characteristics who may be more vulnerable to gambling-related harms. Several respondents highlighted the difference in problem gambling rates between men and women. A few respondents cited evidence that people with learning disabilities / on the spectrum of learning needs are at a greater risk of suffering gambling-related harms. Some respondents also referenced evidence that some ethnic minority groups have a higher risk of problem gambling or being an affected other.

Question 8

Many of the responses to Question 8 expanded on responses given to Question 6. However, some respondents provided additional comments on impact considerations. The majority of these related to proposals outside of the scope of this consultation, including recommendations for further action on advertising and changes to game design and customer-led tools. Similarly, some respondents highlighted concerns around the use of gambling-like mechanisms being applied to non-gambling contexts such as video games and cryptocurrencies. This is outside the scope of this consultation but has been considered as part of the Gambling Act Review and is covered in the gambling white paper.

A few respondents highlighted the need for appropriate monitoring and evaluation of stake limits for online slots games and called for further evidence in this area.

Our response

To help inform our consideration of this issue, we will publish a final stage impact assessment alongside the statutory instrument. The impact assessment contains a cost benefit analysis and includes further consideration of the information that was not possible for the consultation stage impact analysis. An updated summary of the expected impacts from the measures we will implement is below.

Annual GGY reduction in £m (central estimate)	GGY reduction as a % of online slots GGY in 2022/23	GGY reduction as a % of all remote GGY in 2022/23
£166.2m	-5.2%	-2.6%

Alongside the GGY reduction, there will be some other costs to operators, such as the implementation costs of game development teams needing to test and deploy a stake limit on live games. These are explored fully in the final stage impact assessment which will be published alongside the statutory instrument later this year.

Given the complexity of gambling-related harms and the role of many different factors in creating or exacerbating it, we are unable to accurately estimate how

limiting the maximum stake on online products will in isolation impact the population rates of gambling-related harm. However, as explored in the [consultation stage impact assessment](#), we have evidence that any of the options above will limit the potential for harmful losses from those gambling at elevated levels of risk or experiencing problem gambling compared to the status quo of theoretically unlimited stakes.

We acknowledge both the calls for further action to prevent gambling-related harm and the risk of unintended consequences. Stake limits for online slots are only one part of the wider package of regulatory and legislative changes which is intended to create an appropriate balance. The white paper outlined a range of measures to protect those at risk from gambling harm, while also creating a more sustainable sector and supporting the employment, tax and economic contribution that our world leading gambling sector makes. To tackle the illegal online gambling market, we have introduced new powers for the Gambling Commission so it can more effectively take action against the black market through provisions in the Home Office's recent Criminal Justice Bill. The stake limit proposals outlined in this consultation response are in line with those intentions.

We have specifically considered whether this policy is likely to impact persons who share particular protected characteristics as set out in the Equality Act 2010. Our proposals seek to support equalities. To the extent that some gambling harms are more prevalent within young adults, our specific protections for that cohort including the lower proposed maximum stake limit will have a positive equalities impact. Further, the Equality Act 2010 allows for age discrimination when it can be 'objectively justified'. There is clear evidence of an increased risk of gambling-related harm among young adults, which can reasonably be concluded to be exacerbated by access to high stakes, rapid, and repetitive play on online slots. We consider that this group will particularly benefit from a lower online slots stake limit.

Annex A: List of responding organisations who agreed to attribute their response to their organisation

- Al-Hurrayya
- Association of Directors of Public Health (North East)
- Association of Directors of Public Health (Yorkshire & the Humber)
- Association of Police and Crime Commissioners
- Bournemouth University
- BoyleSports Ltd
- Buzz Group Limited
- BV Gaming Limited
- Casumo
- Clean Up Gambling
- Durham County Council
- East Ayrshire Council
- Entain plc
- Evolution AB Gaming
- Flutter Entertainment plc
- GambleAware
- Gambling Harm UK
- Gambling with Lives
- GamCare
- Greater Manchester Combined Authority
- Leeds City Council
- London Borough of Haringey
- Office of the Police and Crime Commissioner – Durham
- North Tyneside Council
- Petfre (Gibraltar) Limited trading as Betfred.com
- Public Health Northumberland County Council
- South Tyneside Council
- The All-Party Parliamentary Group for Gambling Related Harm
- The Gambling Business Group Limited
- The Health and Social Care Alliance Scotland
- The Samaritans

- UK Tote Group
- Wales Safer Communities Network