Consultation on Category D gaming machines and licensing for bingo premises

Contents

Executive Summary	
Category D gaming machines	
Background	
Rationale for change	5
Machines in scope of this stakes and prizes review	5
Government position and Options	6
Impacts	14
Bingo premises licensing	17
Bingo licensing	17
Current regime	17
Rationale for change	19
Government position and options	
Impacts	25
Consultation questions	29
How to respond	42
Privacy Notice	42

Executive Summary

The Government is committed to supporting the land-based gambling industry and ensuring that the regulatory framework that underpins it is fit for purpose. We are consulting on proposals to make changes to stakes and prizes for Category D machines and to update the licensing framework for the bingo sector. The proposals that we are consulting on are outlined below.

Stakes and prizes for Category D machines

The Government is keen to take stock of the effects of recent commercial pressures and explore ways in which sustainable growth might be supported in the family entertainment centre sector. We are therefore consulting on adjustments to stakes and prizes for Category D gaming machines, which are a staple of the family arcade environment. We are consulting on changes to stakes and prizes for crane grabs, coin pushers, and non-money prize machines, and on creating a new category of 'slot-style' non-money prize machines.

Age limit for 'cash out' slot-style machines

We are also seeking views on the proposal to make it an offence to invite, cause or permit anyone under 18 to use 'cash out' slot-style Category D machines, as set out in the previous Government's response to its consultation on measures relating to the land-based sector. Category D slot-style machines that offer a monetary prize are currently able to be played by children. These machines share similarities with higher stake, adult-only gaming machines. Members of Bacta (arcades trade association) implemented a voluntary agreement in 2021 to ban under 18s using these machines. We are proposing to move this voluntary agreement into legislation to cover the minority of FECs not already complying with Bacta's age restriction agreement.

Bingo licensing

There is a growing number of licensed bingo premises which predominantly site gaming machines and are difficult to distinguish from adult gaming centres. The Government is seeking views on measures to create a clearer distinction between AGCs and bingo premises and ensure land-based gambling premises have a licence type that is appropriate to their offering. The key proposal we are seeking views on is the establishment of a 'bingo area', occupying a minimum proportion of venue floor space, in all licensed bingo venues. We are also consulting on rules that could apply to this area, including prohibiting cabinet and in-fill style gaming machines and requiring a minimum number of positions for bingo in the bingo area.

Category D gaming machines

Background

- Family Entertainment Centres (FECs) are valued community assets where families
 can spend time together and have fun. They are recognised by the Government as
 making an important contribution to tourism and employment in many towns,
 particularly near the coast.
- 2. The number of licensed FECs has been declining in recent years, from 220 in 2018 to 171 in 2024. Licensed FECs have seen their GGY decline from £53.6m in 2018/19 to £38.7m in 2023/24, representing an average annual decline of over 5%.
- 3. Licensed FECs require a licence from the Gambling Commission whereas unlicensed FECs require a permit which is issued by the local authority. Both types of venues are allowed to offer an unlimited number of Category D machines but licensed FECs can also make Category C machines available for use, as long as they are in a segregated part of the premises that is supervised to prevent children and young people accessing these machines.
- 4. Category C machines can only be played by people aged 18 or older and have a maximum stake of £1 and a maximum prize of £100. By contrast, Category D machines do not have an age limit and therefore can be played by children and young people. Category D machines are currently split into five categories that govern the limits on stakes and prizes. These are:
 - a. Money-prize: maximum stake 10p, maximum prize £5 (money prize only)
 - b. Non-money prize: maximum stake 30p, maximum prize £8 (non-money prize only)
 - c. Crane grab machine: maximum stake £1, maximum prize £50 (non-money prize only)
 - d. Combined money and non-money prize: maximum stake 10p, maximum prize £8 (of which no more than £5 may be a money prize)
 - e. Coin pusher or penny falls machine: maximum stake 20p, maximum prize £20 (of which no more than £10 may be a money prize).
- 5. The principal power to set the limits for stakes and prizes is provided for in <u>section 236 of the Gambling Act 2005</u> and requires the Secretary of State to define the different categories of gaming machine, which can be done by reference to monetary limits on stakes and prizes applying to different types of machine. <u>The Categories of Gaming Machine Regulations 2007</u> used these powers to set stake and prize limits on gaming machines. These Regulations defined limits for money-prize, non-money prize and combined money and non-money prize machines. The definitions of crane grab and coin pusher/penny fall machines were added by <u>the Categories of Gaming Machine (Amendment) Regulations 2009</u>. Subsequent changes were also made to the stakes and prize limits for coin pusher/penny fall machines by <u>the Categories of Gaming Machine (Amendment) Regulations 2014</u>. The history of changes made to

the stakes and prizes for Category D machines is set out in further detail in Annex A.

Rationale for change

- 6. In response to concerns from the British gambling industry that some of its sectors are continuing to struggle in the current economic climate, the Government is keen to take stock of the effects of recent commercial pressures and explore ways in which sustainable growth might be supported in these sectors.
- 7. The Government is clear that growth cannot be pursued at any cost. It is vitally important to uphold the licensing objectives set out in the Gambling Act 2005, which includes protecting children and other vulnerable people from being harmed or exploited by gambling. This objective is an important consideration in relation to Category D gaming machines, given that these machines can be played by, and are popular with, children. As noted by the Gambling Commission's 2024 Young People and Gambling Report. 20 per cent of 11-17 year olds spent their own money on arcade gaming machines such as penny pushers or claw grab machines in the previous 12 months. Our review of Category D gaming machine stake and prize limits seeks views on whether there is scope to stimulate the conditions for socially responsible growth in order to support a sector that has been a cornerstone of British holidays and tourism for generations.
- 8. The last changes in stakes and prizes for Category D machines were made in 2014 and only increased the limits for coin pushers/penny fall. The economic climate for FECs has since changed, particularly in light of closures during the COVID-19 pandemic and subsequent increases in inflation and energy costs. One lever that the Government can pull to support these businesses is to increase the stakes and prizes limits on Category D machines.

Machines in scope of this stakes and prizes review

- 9. Whilst Category D machines are generally considered to be lower-risk gambling products, the Government understands that no gambling activity is risk-free. This stakes and prizes review will focus on machines that offer non-money prizes. While cash can be reinserted for further play, potentially facilitating behaviours like chasing losses, tickets cannot and have no value beyond what they can be redeemed for within a venue. Balancing the risks of potential harm that could be caused by increasing stakes and prizes for Category D machines with the intention to support the sector, the Government will focus on those machines which offer non-money prizes and a combination of money and non-money prizes.
- 10. In addition to the type of prize that a machine pays out, other characteristics of machines are important to consider. Slot-style (or reel-based) Category D machines, also known as slot machines and fruit machines, are offered in family entertainment centres and can legally be played by under-18s. These machines can pay out a small amount of cash or tickets which can be exchanged for a small prize. 'Cash-out' slot-style machines have a maximum stake of 10p and a maximum prize of £5, while

'ticket-out' slot-style machines have a maximum stake of 30p and an equivalent of a prize worth up to £8.

- 11. As set out in the previous Government's <u>white paper</u>, there are concerns that 'cash-out' slot-style machines share similarities with higher stakes machines, which are restricted to adults. The Government intends to put an age limit of 18 on these types of machines, in line with the proposals set out in the previous Government's <u>response to its consultation on measures related to the land-based sector</u>. As they will be allowed to remain on the floor of arcades and not be required to move to an age restricted area, we will not be looking at amending the stakes and prizes for this type of machine. This will mitigate the risk of harm if someone under the age of 18 is able to play on one of these machines. In addition, the Government will not look at increasing the stakes and prizes for any machines which only pay out cash. This consultation will seek additional views on the Government's intention to introduce the age limit, in line with the proposals set out by the previous Government.
- 12. There are also a range of slot-style, or reel-based, machines that pay out in tickets. At the moment, these machines fall within the category of non-money prize machines, which can include a range of different offerings, including slot machines, multi-slot machines, and 'entertainment-style' games that contain an element of chance. While many of these machines do not resemble more traditional adult gambling products, slot-style machines do share similarities, such as appearance and gameplay, with higher stakes machines. Therefore, the Government does not think it is appropriate to increase the stakes and prizes on 'ticket-out' 'slot-style' machines. However, other machines that fall within the non-money prize category, where the maximum stake is 30p and the maximum prize is £8, will be in scope of this review. The Government is therefore consulting on separating out 'ticket-out' 'slot-style' machines from its current category, and we will not consider a stake or prize increase for this type of machine.
- 13. Crane grab machines, which are also only allowed to pay out a non-money prize, will be included in this review. The current limits of £1 maximum stake and £50 maximum prize were last changed in 2009. These types of machines are also unlike other gambling products that are available to adults to play.
- 14. Category D machines that pay out a combination of money and non-money prizes, which are split into two categories under the legislation, will also be in scope of this review. Coin pushers and penny fall machines are a separate category to other machines that pay out a combination of prizes. While coin pushers have a maximum stake of 20p and maximum prize of £20 (of which no more than £10 may be a money prize), other machines are limited to a maximum stake of 10p and a maximum prize of £8 (of which no more than £5 may be a money prize).

Government position and Options

15. The Government would like to collect information and evidence as part of this consultation process to fully understand the impacts that any increases to stakes and prizes would have in terms of impacting revenue for operators, whether changes

- would encourage investment, and whether any risks particularly to children and young people could be posed by changing these limits. We have set out options for the different categories of machines to aid consultation responses and to indicate the Government's current position.
- 16. The effectiveness of this review will depend on the quality of the evidence that we receive. We strongly encourage all stakeholders to provide data and evidence related to Category D machines, including but not limited to areas such as gross gambling yield by machine subcategory, current actual stake and prize levels by subcategory, player behaviour such as average stake and session length, impacts of stake and prize limits on machine attractiveness, revenue and investment, and risks of gambling-related harm.
- 17. Details of the proposed changes are outlined in the sections below. A high-level overview of the proposed changes to stakes and prizes is as follows:

Current Category of Machine	Current Stake Limit	Current Prize Limit	Proposed Change to Category	Proposed Stake Limit	Proposed Prize Limit
D (money prize)	10p	£5	N/A	10p	£5
D (non-money prize)	30p	£8 non-money prize	New 'non-money prize, slot-style' category	30p	£8 non-money prize
			New 'non-money prize, non-slot style' category	30p / 40p / 50p	£8 / £15 / £20 non-money prize
D (crane-grab)	£1	£50 non-money prize	N/A	£1	£75 non-money prize
D (coin pusher / penny fall)	20p	£20 (no more than £10 money prize)	New 'pusher / penny fall - money and/or non-money prize' category (includes pusher machines previously in non-money prize category)	30p	£20 (no more than £12 money prize)
D (other combined money and non-money prize)	10p	£8 (no more than £5 money prize)	N/A	10p	£8 (no more than £5 money prize)

18. The category of crane grab machines was introduced in 2009 and the stake and prize limits set at that time - a maximum stake of £1 and a maximum non-money prize of £50 - have remained unchanged since. Crane grab machines play an important role in different gambling venues, and particularly seaside arcades. They are a staple of the family arcade environment, contributing to its unique appeal, and are an important source of revenue for operators. Costs for goods such as soft toys and technology such as headphones have increased significantly since 2009. According to the Bank of England, based on data from the Office for National Statistics, average prices of goods included in the Consumer Prices Index in the UK have risen by over 55% from 2009 to 2025. This has impacted arcades' ability to offer attractive prizes to customers. The Government is sympathetic to the arcade sector's call for an increase to the prize limit to ensure that customers are still attracted to play on machines where larger or higher-value prizes are offered, recognising that attractive prizes are a key driver of engagement. The Government believes that increasing the maximum prize to £75 would make it more feasible for operators to keep crane grabbers with high-value prizes as attractive offerings in venues, thereby encouraging continued investment in these machines. Based on the current evidence available to us and in line with proposals from the industry, we are not proposing to make changes to the stake limit for these types of machines. Our view is that the stake limit is set at an appropriate level, considering who can play the machine and that the prizes typically offered are attractive to children. We encourage feedback from all relevant stakeholders on these proposals.

Proposal: Crane grab machine maximum stakes to remain at £1 and prize limits to increase from £50 to £75

Non-money prize machines

- 19. Non-money prize machines encompass a variety of games seen in seaside arcades. They include low-stake fruit machines which resemble traditional slot machines and pay out in tickets, as well as a wide variety of non-slot style machines. 'Roll down' machines, which see players insert and roll coins down a chute with the objective of landing them in a specific area to win a prize, fall into this category. Machines where a player pushes a button to stop a spinning wheel or dial and receives a prize based on the final position of the wheel or dial, where this involves a significant element of chance, would also fall into this category. The category also includes multi-slot machines, which feature a player panel with a multiple choice of coin entry slots allowing stakes to be placed on each of a number of game elements - for example, the machine might present a five horse race and have five slots each designated for betting on one of the horses. More generally, these machines include any machine that pays out in tickets which involves an element of chance. The industry has noted that some machines in this category, which have a physical and video game element but which also involve some element of chance, can be difficult to differentiate from skill with prize machines. Non-money prize machines have a maximum stake of 30p and a maximum prize of £8.
- 20. Skill with prize (SWP) machines are not classed as gaming machines, so there is no limit on the number of SWP machines that can be made available in a single location.

Skill with prize machines includes a variety of games where the better one's result, the more tickets one wins. Examples include basketball games, games where customers throw balls to knock down targets, and 'skee-ball' where the customers aim to roll a ball down a ramp into target holes. They also include digital amusement games where a player might, for example, move through a virtual world while defeating virtual characters and receive a ticket payout based on how far through the virtual world they get. Skill with prize machines have no legal stake or prize limits. A voluntary limit has previously been agreed between machine manufacturers and trade bodies, limiting the price of one game to £1 and the maximum prize to £50 (wholesale value).

21. The Gambling Act 2005 sets out when a machine is categorised as a gaming machine and when it is categorised as a Skill with Prize machine. The Gambling Commission provides <u>information</u> and <u>guidance</u> to licensing officers on this topic. The main difference is whether any of the games offered on the machine amount to 'gaming' as defined in <u>section 6 of the Gambling Act 2005</u>, the key point of differentiation from other machines being whether the machine contains an element of chance. In the Gambling Act 2005, 'gaming' means playing a game of chance for a prize. Any game that contains an element of chance (unless it is so slight that it can reasonably be disregarded) is a gaming machine. If just one game from a group of skill games is a game of chance, then the machine as a whole is classed as a gaming machine.

Non-money slot-style machines

- 22. As outlined above, this category of machine includes slot-style, or reel-based, machines with non-money prizes. These are low-stake fruit machines which pay out in tickets and which are accessible by children. Although they do not pay out in cash, these machines generally resemble in appearance and gameplay higher-category, higher-stake machines available to adults, which are associated with a greater risk of gambling harm than Category D machines. Other Category D machines are visibly different from, and function in a different manner to, traditional reels-based gaming machines. Our position is that it would be beneficial to create a clearer distinction between games that are unlike adult gambling products and those that are. Therefore, the Government is proposing to split the non-money prize category in two. We intend for slot-style machines that offer only tickets or other non-money prizes to be placed into a separate category from other non-money prize machines. This review will not consider any increase in stake and prize limits for slot-style machines.
- 23. We envisage that the definition of non-money slot-style machines would encompass any non-money prize machine that includes a reel-based game, though we are open to considering other definitions as part of this consultation process. We are mindful that there may be nuances associated with physical machines that mean that adjustments to this definition might be necessary. To define a reel-based game, the Government could draw on the definition that has been used for the introduction of a stake limit for online slots. A reel-based game in this context would refer to: games where moving or changing images or text are displayed by the use of reels, visual representations of reels or other means, and an individual may win a prize or other

opportunity or advantage, as represented by the resulting arrangement of those images or text. We welcome feedback on this definition as part of the consultation process.

Proposal: Introduce a new category of machines - non-money 'slot-style' machines, maintaining the current stake and prize limits for non-money prize machines of 30p and £8; and

Set out that the definition of these gaming machines draws upon the definition of a reel-based game used to define online slots games, and define them as providing: games where moving or changing images or texts are displayed by the use of reels, visual representations of reels or other means, and an individual may win a prize or other opportunity or advantage, as represented by the resulting arrangement of those images or text.

Non-money non-slot style machines

- 24. There are a variety of non-money prize Category D machines that do not resemble fruit machines and are not reel-based. Examples of these machines include 'roll down', 'spin the wheel' and multi-slot machines, as outlined in greater detail at paragraph 18. Feedback from the arcade sector suggests that an increase to stakes and prizes for non-money prize machines could encourage investment in new types of Category D gaming machines that are unattractive to site due to the current stake and prize limits. Our view is that there is a case for giving family entertainment centres more flexibility over the stakes and prizes they can offer on these machines and to encourage a greater range of styles of machine and gameplay.
- 25. We are also mindful of several considerations related to a potential increase to stakes and prizes on these machines. As set out by the Gambling Act 2005 and the Gambling Commission's guidance, non-money prize Category D gaming machine games involve an element of chance, and may be entirely based on chance. They may also include language, mechanics or themes associated with gambling, such as 'jackpots', spinning wheels or, as noted above, betting on the randomly determined outcome of a mechanical horse race. It is therefore important that we fully consider any potential risks that might be associated with making these machines more attractive to children and young people through increases in stakes and prizes. This is especially important given the wide variety of games that fall into this category. Additionally, for these reasons, and the distinction in principle between Category D and Skill with Prize machines, we do not think it would be appropriate to consider increasing stakes and prizes for the entire sub-category to a level similar to the voluntary limit agreed for Skills with Prize machines (£1 stake and £50 prize).
- 26. We appreciate the importance to the arcades of offering a variety of games to customers at stake and prize levels that are attractive to customers. The current restrictions on non-money prize machine stakes and prizes may be a barrier to operators of investing in or upgrading these machines. Moreover, the proposal to separate reel-based machines into a separate subcategory would mean that any increase in stake and prize here would only apply to machines that do not resemble

higher-stake, adult-only slot machines. We are therefore open to considering an increase in stakes and prizes for these machines both to provide an inflationary adjustment and to help facilitate operators offering a wider variety of machines and styles of gameplay. We are therefore consulting on options for an increase up to a 50p stake and £20 prize limit.

27. We are clear that any increase must be balanced against the objective of protecting children and young people. We are mindful of the wide variety of machines in this category, as well as the potential for innovations in the market which could mean a blanket increase in stakes and prizes across this category would not be appropriate. To help us assess the strength of the case for an increase in stakes and prizes, we encourage stakeholders to provide data to demonstrate the commercial benefits of a stake and prize increase as well as evidence related to risks of gambling-related harm in children or vulnerable people and mitigations where these risks are present. We are consulting on the following options and welcome detailed feedback and evidence from all stakeholders:

Options

- A) No change to stakes and prizes for non-money prize (other than crane grab) machines
- B) Increase in stakes for non-money prize (other than crane grab) machines to 40p, and increase in maximum prize from £8 to £15
- C) Increase in stakes for non-money prize (other than crane grab) machines to 50p, and increase in maximum prize from £8 to £20

Coin pushers and penny fall

- 28. Coin pusher machines are a stalwart of seaside arcades and provide entertainment to both adults and children. The current limits were last adjusted in 2014 and restrict these machines to offer a 20p maximum stake and a maximum prize of £20 (of which no more than £10 can be a money prize). The industry has called for an increase in stakes and prizes to help future-proof these machines by allowing up to 50p per stake and a £50 prize (of which no more than £20 can be a money prize).
- 29. The Government understands the importance of these machines to seaside arcades. For traditional, combined money and non-money prize coin pushers, the coinage system primarily dictates the increase in stake and prize on these types of machines. Therefore, the next coinage increase would be 50p. However, anecdotal evidence from industry suggests that the vast majority of coin pushers still operate with 2p coins, with a relatively limited number of 20p machines in operation, and that 2p and 10p coins are better suited to the mechanics of pusher machines than 20p and 50p machines. Additionally, the speed of play for traditional coin pushers is generally only limited by how quickly the player can insert coins, and an increase to a 50p stake could result in significantly increased losses in a short space of time, as well as a rate of play greater than what is possible on age-restricted Category C machines, which

have a stake limit of £1 per 1.5 second minimum play cycle. As children are able to play these machines, we are therefore unconvinced that there is a strong case for increasing the stake limit to 50p, which would represent an increase of 150%, at this time. Unless we receive compelling evidence that there is a significant need for such an increase, the Government is minded not to increase the stakes for these machines to 50p. We are instead proposing to harmonise rules for pusher machines, resulting in an increase in the maximum stake from 20p to 30p.

- 30. We appreciate that inflation since the last adjustment to limits in 2014 means that maximum prizes for these machines are likely to have become less attractive to players. The Bank of England, using CPI data from the Office for National Statistics, estimates that average price increases from 2014 to 2025 to be over 35 per cent. We recognise that the current £10 money prize limit prohibits operators from offering £10 notes as prizes, given that coins may also be won alongside a note, which would result in operators exceeding the £10 monetary prize limit by a small amount. Increasing this limit would allow operators to offer £10 notes as prizes. The Government is therefore proposing an increase to the monetary prize that can be offered on pushers from £10 to £12, which we believe will help operators to increase the attractiveness of some coin pushers to players.
- 31. Under current regulations, coin pushers which pay out in tickets (sometimes referred to as 'closed loop' pushers) fall into the non-money prize machine category. Our engagement with industry suggests that innovations in the pusher machine market have seen a significant increase in the number of these machines, which closely resemble traditional coin pushers in terms of their mechanics but which pay out in tickets, and where the item that is 'pushed' is often a token or ball rather than a monetary coin. The current regulations mean that stakes and prizes for these machines, which closely resemble coin pushers, are different from traditional coin pushers and are set at 30p and £8, like other Category D non-money prize machines. The Government believes that, given the similarities between the appearance and characteristics of these machines, there is a case for aligning their categorisation and their stakes and prizes. We also expect this change to lead to a clearer framework for operators.
- 32. For these purposes, we would propose that the definition of a pusher machine broadly follows the definition that characterises combined money and non-money (traditional) pushers today, as set out in the <u>Categories of Gaming Machine</u>

 <u>Regulations 2007</u>. We would therefore propose that the category of 'pusher' machines refer to machines where whether or not the person using the machine wins a prize is determined wholly or in part by either of the following:
 - a. the position in which a coin or token comes to rest after it has been inserted into the machine, together with the position of other coins or tokens which have previously been inserted into the machine to pay a charge for use, or
 - b. if the insertion of a single coin to pay the charge for use enables the person using the machine to release one or more tokens within the machine, the position in which such tokens come to rest after being released, together with the position of other tokens which have previously been so released.

33. Given that the maximum stake for non-money pushers is currently 30p as part of the 'non-money prize' category, we are proposing to set the maximum stake for the combined 'pusher' category at 30p. This means that functionally, the maximum stake of a coin pusher would remain at 20p, given the lack of a 30p coin, while ball or token-based pushers could retain a maximum stake of 30p (e.g. where £1.50 inserted lets the player release 5 tokens). We also propose to align the maximum non-monetary prize for both types of machine at £20, representing an increase in the maximum prize for ticket-out pushers to align them with the non-monetary prize value for traditional coin pushers. This is alongside an increase in the maximum monetary prize that can be offered on pushers that pay out with money and non-money prizes.

Proposal: Align the categorisation of pusher machines that pay out non-money prizes with pusher machines that pay out a combination of money and non-money prizes, to create a new 'pushers' sub-category of machines

Proposal: Maximum stakes for 'pushers' to be set at 30p, and maximum prize for 'pushers' to be set at £20 (of which no more than £12 can be a money prize for pushers that pay out money prizes). This would represent an increase in the maximum prize for non-money prize for coin pushers from £8 to £20. For money and non-money prize coin pushers, it would represent an increase in the monetary prize from £10 to £12, and no change to the maximum non-monetary prize.

Machine style	Current category	Current Stake Limit	Current Prize Limit	Proposed Category	Proposed Stake Limit	Proposed Prize Limit
Coin pusher - money and non-money prize	D (coin pusher / penny fall)	20p	£20 (no more than £10 money prize)	D 'pusher / penny fall - money and/or	30p	£20 (no more than £12 money prize)
'Pusher' machine - non-money prize	D (coin pusher / penny fall)	30p	£8 non-money prize	non-money prize'		

Combined money and non-money prize machines ('other')

34. Machines that are able to pay out both money and non-money prizes, which are not coin pushers, appear to make up a small proportion of all Category D machines. Discussions held with industry prior to this consultation have not highlighted any particular issues with this category of machine and we have not received feedback that suggests an increase in stakes and prizes would be especially beneficial to the arcade sector. We are not minded to change the stake and prize limit from the maximum stake of 10p and maximum prize of £8 (of which no more than £5 may be a money prize).

35. However, the Government is open to receiving evidence through this consultation that outlines a convincing case for any changes to the limits placed on these machines.

Introduction of an age limit of 18 on 'cash-out' Category D slot-style machines

- 36. In line with the position set out in the previous Government's response to the consultation on measures relating to the land-based sector, we intend to make it an offence for a person to invite, cause or permit a child or young person to use 'cash-out' Category D slot-style gaming machines. We believe a precautionary approach is justified for slot-style games which are similar to adult-only gaming machines which pay out in cash. This would bring the voluntary commitment of all Bacta members to prevent under-18s from playing on these machines into legislation. We welcome feedback on anything in this consultation or any other considerations that affect the views of stakeholders on the proposals set out in the consultation response in relation to these machines.
- 37. We also welcome further evidence on the proposal that these machines should be allowed to stay in unrestricted areas in licensed and unlicensed FECs, and other premises including but not limited to pubs and travelling fairs, to ensure that impacts on unlicensed FECs and other small businesses which do not have any age restricted areas are proportionate. We would also welcome further evidence and information on measures and best practice to ensure that children and young persons are not playing on these machines, including the proposal set out in the consultation response that the industry fund, conduct, and report on the outcomes of voluntary test purchasing for these machines.

Impacts

Impacts on operators

- 38. The Government expects the proposed adjustments to Category D gaming machine stakes and prizes will yield several impacts for operators of FECs in particular, including enhancing the attractiveness of machines and encouraging investment, for example in new types of machines.
- 39. We note a number of limitations in relation to assessing the impact on operators of these proposals. While aggregate GGY for Category D machines as a whole from licensed family entertainment centres (FECs) is published by the Gambling Commission, aggregate GGY for Category D machines from unlicensed FECs, which can only offer Category D gaming machines and operate through a permit issued by licensing authorities, is not collected by the Gambling Commission. For both licensed and unlicensed FECs, data on the specific numbers of machines in each Category D sub-category, for example the number of crane grabbers, is not collected by the Gambling Commission. We therefore do not have a view of total GGY for each of these subcategories, and therefore estimating the impact on GGY of these proposals is challenging. There is also limited granular data available on player behaviour such as average stake, session length or precise win/loss per player, as such data is

typically not automatically recorded. These limitations means that while we can infer trends and anticipate general impacts, precise, evidence-based modelling of how specific stake or prize changes will alter individual player habits is challenging. We will seek more granular data of this nature as part of this consultation. We anticipate that the quality of the evidence that we receive will have significant bearings on the decisions that we take.

- 40. We expect the proposed increase in the prize limit for crane grab machines to £75 would allow operators to account for inflationary pressures on prize acquisition costs since the last review in 2009, enabling them to offer more attractive prizes. Particularly for those crane grab machines which offer higher-value prizes such as technology, this is expected to make these machines more attractive to customers. We similarly expect the proposed increase in the maximum prize for pusher machines to £20 (with up to £12 as a money prize) to make these machines more attractive. We therefore expect the changes to result in a moderate uplift to GGY in the FEC sector.
- 41. We expect imposing an age limit on cash-out slot-style Category D machines to have a limited impact on GGY, especially with machines remaining where they can be played by adults who are accompanied by children. Bacta, which represents the amusement and gaming machine industry in the UK, have an existing voluntary commitment for their members to ban all under-18s from playing Category D 'cash-out' machines. Bacta's members make up approximately 70-80% of the market for family entertainment centres and adult gaming centres. Anecdotal evidence from industry suggests that a low proportion of players of Category D 'cash-out' slot-style machines were under the age of 18, even before the voluntary ban.

Impacts on consumers

- 42. We expect the proposals in this consultation to have several impacts on consumers, largely aiming to enhance their entertainment experience while maintaining appropriate safeguards. We note the data limitations associated with Category D machines and welcome additional or new evidence to inform our decisions.
- 43. We expect that the proposed increase in prize limits for crane grab machines (to £75) and pusher machines (to £20, with up to £12 money prize), and a potential increase to stake and prize limits for non-money, non-slot style machines, to mean that prizes will be more attractive to consumers and to contribute to the player experience. Additionally, an increase in stakes and prizes for non-money, non-slot style machines could lead to greater investment in non-money prize machines and a wider variety of gameplay available to consumers.
- 44. We expect that the proposal to introduce a new category for non-money 'slot-style' machines would create a clearer distinction between different types of Category D non-money prize games with different characteristics.
- 45. As noted in the Gambling Commission's 2023 advice to the Gambling Act Review, there has been little research about the long-term impacts of play on Category D

machines, and it is therefore difficult to determine the level of risk associated with potential increases in stakes or prizes for Category D machines. We welcome information and evidence on these matters as part of responses to this consultation. For the majority of Category D machines, particularly those accessible to all ages, the proposed changes maintain relatively low stake and prize limits, and for machines that resemble adult-only gambling machines we are not proposing any changes to stakes and prizes. This will ensure that the entertainment minimises risks of gambling-related harm, consistent with the family-friendly nature of FECs.

Bingo premises licensing

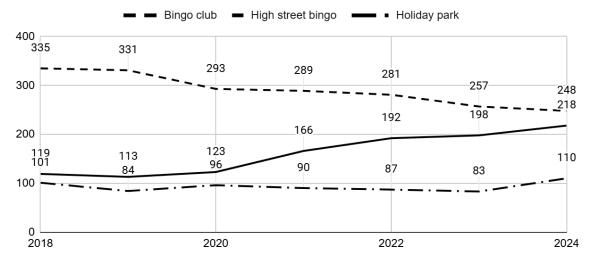
Bingo licensing

Current regime

- 1. The licensed bingo sector is made up of a diverse range of venues, and in recent years there has been an evolution in where and how bingo is offered. The sector includes traditional bingo clubs, which typically have large areas for bingo and smaller areas for gaming machines. Bingo operators also offer facilities for licensed bingo in holiday park settings or in clubs such as working men's clubs or alcohol licensed premises, for example where the stakes or prizes meet the threshold for 'high turnover' bingo.
- 2. In recent years there has been an increase in the number of smaller bingo sites, often on the high street. Some of these venues are predominantly gaming machine-led, and others split their offering between bingo and gaming machines more evenly. Additionally, some operators have introduced new, vibrant concepts for in-person bingo, attracting younger audiences.
- 3. In bingo venues, bingo can be played with a physical ticket or using digital devices such as electronic bingo terminals (EBTs). Games can be limited to a single venue or linked across multiple venues, allowing many more people to participate in a single game than would otherwise be possible
- 4. The number of bingo clubs in Great Britain has been falling in recent years. Data from the Bingo Association, the trade association for the licensed bingo sector in Great Britain, shows that the number of bingo clubs registered with the Association fell from 335 to 248 between December 2018 and August 2024. Despite the fall in the number of bingo clubs, the number of licensed bingo premises in Great Britain has remained steady, according to the Gambling Commission's industry statistics. This is partly due to an increase in the number of high street bingo premises. Figure 1 shows that the number of high street bingo premises registered with the Bingo Association increased from 119 in 2018 to 218 in 2024.

Figure 1 - Number of venues registered with the Bingo Association, by type

Venues registered with the Bingo Association, by type, 2018-2024



- 5. These changes have coincided with shifts in the composition of bingo sector gross gambling yield (GGY). According to <u>Gambling Commission Industry Statistics</u>, the proportion of GGY that the overall licensed bingo sector derives from gaming machines significantly increased from 44% in the year to March 2014 to 63% in the year to March 2024. Gaming machines are now the primary revenue stream for the licensed bingo sector, and represent a higher proportion of sector GGY than in the land-based casino sector (25%) and the land-based betting sector (50%).
- 6. Research indicates that in-person bingo is a relatively low-risk gambling activity. The <u>Health Survey for England</u> and the <u>Gambling Commission's Gambling Survey for Great Britain</u> found that rates of PGSI scores of 8 or more were lower for players of in-person bingo than for any other gambling activity except for lotteries, scratchcards, lottery instant win games and private betting. The Government also recognises that bingo can play an important social role in local areas, including offering opportunities for fun and socialising and helping to combat loneliness.
- 7. The regulatory framework established by the Gambling Act 2005 does not set out the proportion or amount of bingo that licensed bingo premises must offer. However, the Gambling Commission's Licence Conditions and Codes of Practice (LCCP) sets out requirements in relation to the provision of facilities for bingo in licensed bingo venues. This provision applies to all non-remote bingo operating licences. Social responsibility code 9.1.2 says that in licensed bingo premises, gaming machines may be made available for use only where there are also "substantive" facilities for non-remote bingo. The threshold for "substantive" is not defined in the LCCP. The Commission noted in its 2016 consultation responses document that it did not explicitly seek to quantify what 'substantive' would mean in all circumstances, as it wanted to avoid an inflexible 'one size fits all' approach. Additionally, the LCCP requires that bingo licensees ensure that the function and presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

- 8. As highlighted in the <u>Gambling Commission's advice to the previous Government</u> (pages 135-137) as part of the Gambling Act Review, there are gambling premises which are licensed solely as bingo venues, but which offer relatively limited facilities for the play of bingo and give the appearance to consumers of being adult gaming centres. In these bingo venues, gaming machines can take up most of the floor space and are the most predominant feature on display to consumers when they enter the premises.
- 9. The Gambling Act 2005 (Mandatory and Default Conditions) Regulations 2007 prohibit the consumption of alcohol whilst gambling is taking place on the premises for AGCs, FECs and betting premises (other than at tracks). There is no prohibition in respect of bingo premises, which may apply for an alcohol licence.

Rationale for change

- 10. Many licensed bingo premises are largely taken up by gaming machines and are difficult to distinguish from adult gaming centres. The Government's current understanding, based on our engagement with industry and the Gambling Commission, is that a significant number of high street bingo premises offer limited facilities for bingo. The Government wants to ensure that all land-based gambling premises have a licence type that is appropriate to the offering in their premises.
- 11. The aforementioned changes in the bingo sector may mean that the distinction between some licensed bingo premises and adult gaming centres is unclear to many consumers. The Government believes that it is important that consumers have clear expectations about types of licensed premises and for there to be clear distinctions between them. Gaming machine play is associated with a higher risk of experiencing problem gambling than in-person bingo, with a higher rate of PGSI scores of 8+ according to the Gambling Survey for Great Britain. A PGSI score of 8+ usually represents problem gambling. A venue that primarily offers gaming machines - even if licensed as a bingo venue - has a different overall risk profile to a bingo venue with prominent bingo facilities. Additionally, a lack of clarity about the type of premises one is in or the premises within a geographical area might have implications for consumer protection and the risk-profile of an area, which may impact how a licensing authority approaches gambling strategy and decision-making. For example, it might make it more difficult for a customer to understand which multi-operator self-exclusion scheme is relevant to them in particular circumstances. The current framework also creates a situation whereby alcohol is not permitted in any gaming machine-led premises that are licensed as an adult gaming centre, but may be permitted in gaming machine-led premises that are licensed for bingo.
- 12. In its <u>2023 advice to the previous Government</u> as part of the Gambling Act Review, the Gambling Commission recommended that the Government consider a requirement for a minimum percentage of the licensed premises area in bingo venues to be designated exclusively for bingo facilities, in order to ensure a greater substantive offer of bingo in such premises. This adjustment would strengthen the Gambling Commission's existing rules in the LCCP for bingo licensees related to the

provision of bingo.

- 13. A clear delineation between different types of licensed gambling premises in this case between bingo premises and adult gaming centres is important to ensure that the gambling licensing system and regulatory framework are fit for purpose. It would help ensure that policy could be appropriately targeted to different parts of the land-based gambling sector in the future. It also aligns with the previous Government's commitment, in its 2024 response to the consultation on measures relating to the land-based sector, to explore measures to create a clearer distinction between arcade premises and bingo venues. Additionally, requiring a minimum level of facilities for bingo in licensed bingo premises would help ensure that all such venues have a substantive offering of bingo.
- 14. In light of these factors, the Government believes there is a case for strengthening licence conditions for bingo premises in line with the Gambling Commission's 2023 advice. We are consulting on proposals to ensure that all bingo venues offer a minimum level of provision of facilities for bingo and to create a clearer distinction between bingo venues and adult gaming centres.

Government position and options

15. This consultation proposes the establishment of a 'bingo area', an area of the venue dedicated to facilities for bingo, in all licensed bingo premises. It also consults on options related to the conditions that might apply to the 'bingo area'. For some proposed conditions, the Government has indicated a preferred option, based on the evidence currently available to us.

A 'bingo area' in licensed bingo premises

16. The Government is proposing to require that a minimum proportion of floor space in licensed bingo venues is dedicated to facilities for bingo. This requirement would ensure that all bingo premises offer a minimum level of facilities for bingo and would also ensure a clearer distinction between licensed bingo premises and adult gaming centres. As set out below, the Government is consulting on a number of conditions that could apply to the area for bingo, including prohibiting the siting of in-fill or cabinet gaming machines in the bingo area, and mandating a minimum number of seated positions for bingo to be included in the bingo area. We welcome feedback from all stakeholders on the establishment of a bingo area.

Proposal: Require that a minimum proportion of floor space in licensed premises is dedicated to facilities for bingo and designated as the 'bingo area'

Proportion of floor space dedicated to the bingo area

17. We recognise that licensed bingo premises vary in the proportion of floor space allocated to bingo facilities, gaming machines, and other areas like lobby space. Whilst many bingo venues dedicate significantly more than half their floor space to bingo, there are others that divide space more evenly between bingo and gaming machines or may have more space dedicated to gaming machines than bingo. We believe that dedicating at least 30% of a licensed bingo premises' total floor space to

a bingo area would ensure that bingo remains a significant part of the overall offering and would differentiate these venues from adult gaming centres. Additionally, our view is that requiring a proportion of floor space greater than 50% of the venue could be disproportionately burdensome for some small bingo venues. We are seeking to collect further evidence to inform our views on the proportion of venue floor space that should be designated as the bingo area, to help ensure that our approach is proportionate and evidence-based. We are consulting on three options in relation to the proportion of floor space in licensed bingo venues that should be designated as the bingo area:

Options

- A. At least 30% of floor space in licensed bingo premises should be designated as a continuous bingo area.
- B. At least 40% of floor space in licensed bingo premises should be designated as a continuous bingo area.
- C. At least 50% of floor space in licensed bingo premises should be designated as a continuous bingo area.

Gaming machines in the bingo area

18. Our intention is for the bingo area to be a space genuinely dedicated to bingo and which is differentiated from gaming machine-led areas. The Government therefore believes that it would be inappropriate for large, fixed gaming machines to be available in this area. As in the previous Government's response to its consultation on measures relating to the land-based sector, when considering the range of types of gaming machines, we distinguish between tablet gaming machines (fixed or handheld), in-fill gaming machines and cabinet gaming machines. We propose prohibiting any cabinet or in-fill gaming machines from being sited within the bingo area. Additionally, we propose that every tablet gaming machine in the bingo area must offer bingo, even if it also offers gaming machine content. Our intention is therefore: for (a) bingo and (b) gambling via tablet or other handheld machines which also offer bingo to be the only gambling activities permitted in the bingo area; and for larger gaming machines, namely in-fills and cabinets, to be sited in a separate area.

Proposal: Licensed bingo premises must not site cabinet or in-fill gaming machines within the bingo area

Proposal: Any tablet gaming machines permitted in the bingo area must also offer bingo

19. We are mindful of the potential to inflate the size of the bingo area by defining the spaces in parts of the venue that are gaming machine-led as part of the bingo area. For example, we do not think it would be appropriate for areas of floor space between gaming machines in the area dedicated to gaming machines to be defined as part of the bingo area, even though it might theoretically be possible for bingo to be played in these spaces. This would undermine the intention of creating a distinct area for bingo in all bingo premises. We are therefore consulting on a condition that in-fill and

cabinet gaming machines should not be sited within a certain distance of the bingo area. The Government's preferred approach is that there should be such a minimum distance. To ensure that our proposals are suitable for the full range of licensed bingo premises, we are seeking views on this proposal and the appropriate minimum distance between the bingo area and cabinet and in-fill gaming machines.

Options

- A) No minimum distance between cabinet or in-fill gaming machines and the bingo area
- B) Licensed bingo venues must not site cabinet or in-fill gaming machines within at least 0.5 metres of the bingo area.
- C) Licensed bingo venues must not site cabinet or in-fill gaming machines within at least 1 metre of the bingo area.
- D) Licensed bingo venues must not site cabinet or in-fill gaming machines within at least 2 metres of the bingo area.

Gaming machine content on EBTs

- 20. Electronic bingo terminals (EBTs) are widely used in bingo venues for participation in bingo games. EBTs, which are often mobile, frequently offer gaming machine content alongside bingo. We would like to seek views on three options as part of this consultation, to ensure that our final position is evidence-based.
- 21. The Government's preferred option is to permit the use of EBTs in the bingo area with the same gaming content that is currently allowed on EBTs in bingo premises. Given the presence of gaming machine content on many EBTs today, prohibiting gaming machine play on EBTs in the bingo area could impose significant operational burdens on many bingo venues. It would likely require bingo operators to monitor the types of tablet devices or games customers play in the bingo area, or to modify the offerings on EBTs. It could also disrupt the experience for customers who are accustomed to playing gaming machine content on EBTs during bingo game intervals. Additionally, as noted in the Gambling Commission's guidance on when a machine is "available for use", an EBT must only allow participation in one gambling activity at a time and should not therefore contain functionality which allows participation in bingo and gaming machine activity simultaneously. This would help ensure that the bingo area is likely to be primarily dedicated to the playing of bingo, especially during bingo sessions.
- 22. We are also seeking stakeholder views on permitting only Category C and D gaming machine content on permitted devices in the bingo area. The rationale for including this option is that it could allow customers to continue to play gaming machine content in the bingo area, while maintaining the area as a lower-risk gambling environment primarily dedicated to bingo rather than gaming machine play. Category B gaming machines are considered 'harder' (potentially more intensive or higher stakes) gambling products when compared to other machines. This option would

demarcate the bingo area as an area with a mixed gambling offering, weighted towards lower stake and prize machines. We believe that this option would place operational burdens on bingo venues and could restrict their commercial flexibility, and we would welcome feedback on this. We would also welcome feedback and evidence on the impacts that this proposal might have on gambling-related harm, as well as the impacts that it might have on the customer experience in bingo venues.

23. The third option on which we are consulting is a requirement that bingo is the sole gambling activity permitted in the bingo area. We want to gather views and evidence on the potential benefits and impacts of having a space in licensed bingo premises dedicated exclusively to bingo. Under this option electronic bingo terminals without gaming machine content would still be permitted in the bingo area. This type of approach has precedent in the gambling licensing regime. Small and Large 2005 Act casinos must offer a table gaming area, where no gambling is permitted other than gambling by way of table gaming, in order to ensure that casinos maintain a balanced mix of products and that table gaming remains at the core of their offer.

Option A) In licensed bingo venues, all currently permitted gaming machine content on tablets which offer electronic bingo should be permitted in the bingo area

Option B) In licensed bingo venues, only Category C and D gaming machine content on tablets which offer electronic bingo should be permitted in the bingo area

Option C) In licensed bingo venues, no gaming machine content should be permitted in the bingo area. (Electronic bingo terminals without gaming machine content permitted.)

Positions in the bingo area

- 24. The Government believes that the bingo area should be actively available for bingo and not be a dormant space or used solely for non-bingo facilities like bar space. We are consulting on a requirement for a minimum number of distinct designated positions for playing bingo in the bingo area. We believe a position to be a concept familiar to many bingo operators. In our view, a position is a space for a customer to play bingo while seated, which is recognisable as such, providing a surface for paper or electronic play of bingo. A distinct position would be a seat or wheelchair space where a single customer can play bingo unimpeded while seated. For example, a single table with four seats would count as four positions. We would not consider a seat primarily intended for use at a non-EBT gaming machine to be counted as a position for bingo. We will seek further views from stakeholders as part of this consultation on how a position should be formally defined.
- 25. We do not expect a requirement related to a minimum number of positions to be a burdensome requirement for bingo venues that offer areas for the playing of bingo today. Many bingo venues offer hundreds of positions for bingo. We recognise the diversity of bingo premises and that there will be varied views on the appropriate minimum number of positions. Our options are based on the information available,

including reviewing publicly available data such as premises floor plans, as well as engagement with the bingo sector.

Options

- A) No requirement for a minimum number of positions for bingo in the bingo area
- B) The bingo area as a whole must contain a minimum of 30 distinct positions for bingo
- C) The bingo area as a whole must contain a minimum of 40 distinct positions for bingo
- D) The bingo area must contain a minimum of 30 distinct positions for bingo. Where the bingo area is under 200 square metres in size, it should contain at least one distinct position for every 2.5 square metres of floor space. Where the bingo area is at least 200 square metres in size, it should contain at least 80 distinct positions, with no further requirement for more positions if the floor space is greater than 200 square metres.

Other features of the bingo area

- 26. The Government is not proposing other requirements related to the presentation of the environment in the bingo area. We want to give operators flexibility over the visual presentation of venues and allow space for adaptation or innovation. Bingo premises must already satisfy LCCP 9.1.2, which requires that the internal and/or external presentation of licensed bingo premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.
- 27. We welcome stakeholder views on aspects of our proposals that mean they may not achieve the objectives of creating a clearer distinction between adult gaming centres and bingo premises and ensuring bingo premises offer meaningful facilities for bingo. We also welcome any additional proposals that may be worth considering in order to achieve those objectives.

Transitional arrangements

- 28. The Government intends for the proposals in this consultation to apply both to existing bingo premises and to premises which may be granted a bingo premises licence in the future. As set out in more detail below, we anticipate that these proposals may require some bingo premises licensees either to adapt the layout and offering in their bingo premises or alternatively to convert premises to adult gaming centres, both of which would involve costs for operators.
- 29. We would provide an appropriate implementation period, the length of which would be informed by input received during this consultation, before any new requirements came into force, to allow operators to make any changes required. We will consider whether it would be appropriate for this commencement period to differ for newly

licensed premises compared to existing ones and if other differentiated arrangements would be required to ensure that impacts on operators are proportionate. The nature and duration of these transitional arrangements will be informed by the evidence gathered through this consultation. We welcome views from all stakeholders on these matters.

30. We also recognise that these proposals would entail new requirements that licensing authorities, alongside the Gambling Commission, would be required to take account of and enforce. We welcome views from licensing authorities on these proposals and any considerations related to transitional arrangements. We will work closely with the Gambling Commission to ensure that appropriate guidance is provided to licensing authorities regarding any new requirements for bingo licensees.

Scotland

31. The Government's expectation is that the proposals in this consultation would be implemented via changes to the Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007. It is for Scottish Ministers to consider whether they want to amend the Mandatory and Default Conditions that apply to bingo premises located in Scotland.

Impacts

Impacts on gambling operators

32. The Government recognises that the proposals in this consultation would have impacts on operators in the bingo sector, particularly operators with premises where most of the floor space is dedicated to areas for gaming machines. We will use responses to this consultation to help quantify impacts, and we encourage responses to this consultation to provide data and other evidence related to expected impacts. Any data we receive will be used to ensure that any measures we propose are proportionate. Whilst we have considered impacts on operators of different types of venue below, we understand that there is a diverse array of bingo venues and that impacts are likely to differ from case to case.

Impacts for operators of licensed bingo venues which have a large proportion of their premises dedicated to facilities for bingo

33. We expect the proposals in this consultation to have relatively limited impacts where bingo premises already have large areas for the playing of bingo. The proposals would require operators to ensure that venues have a minimum proportion of the venue designated for the playing of bingo and to define this as the bingo area. We do not expect this to require adjustments to the layout of these venues. The proposals relating to gaming machines in the bingo area would require operators to ensure that any cabinets or in-fill gaming machines were not sited in the bingo area and, under the Government's preferred approach, operators would need to ensure that cabinets and in-fills were located a minimum distance from the bingo area. For most venues with large areas for bingo, we do not expect this requirement to be burdensome.

However, we acknowledge some clubs site gaming machines in the bingo hall today and note that this may have implications for where operators demarcate the bingo area.

34. We are consulting on a number of options relating to gaming machine content on EBTs in the bingo area. The Government's preferred approach is to permit gaming machine content on tablet EBTs in the bingo area. We welcome evidence on the potential impacts of prohibiting Category B gaming machine content or all gaming machine content in the bingo area.

Impacts on operators of bingo venues where less than 30%-50% of floor space is dedicated to facilities for bingo

35. For licensed bingo premises where over 50% of the venue is dedicated to areas for facilities other than bingo, such as areas primarily siting gaming machines, we expect that operators would need to make adaptations to meet any requirements related to establishment of a bingo area. If a premises did not meet the floor space threshold set for the bingo area, licensees could adapt their premises to expand the area that is dedicated to facilities for bingo. Alternatively, a licensee could choose to convert a bingo premises to an adult gaming centre premises. This would require them to apply to vary the relevant premises licence to an adult gaming centre premises licence. If the licensee did not already hold the appropriate operating licence, it would also require them to obtain a *Gaming machine general: AGC* operating licence.

Converting bingo premises to AGC premises

- 36. If an operator wished to maintain a predominantly gaming machine-focused offering in a particular venue and not to offer a minimum area of floor space for facilities for bingo, it could convert the premises to an adult gaming centre premises licence. Any premises converting from a bingo premises licence to an adult gaming centre premises licence would need to abide by the rules related to the playing of bingo in adult gaming centres, should these premises choose to continue offering bingo. Adult gaming centres are permitted only to offer prize bingo (where bingo is played for a set of prizes which are not determined by the number of people playing or the amount paid or raised by the game, and where bingo is therefore in a format which meets the definition of 'prize gaming). A key impact of converting a bingo premises to an adult gaming centre premises is therefore that the premises can no longer offer bingo other than prize bingo.
- 37. If an operator did not already hold a *Gaming machine general: AGC* operating licence, it would need to add a new licence activity to its current non-remote operating licence. Current licence application fees for *Gaming machine general: AGC* operating licences are between £1,406 and £23,435, depending on the operator's gross gambling yield (GGY). The application fee for adding a licensed activity is 25 per cent of the standard licence application fee, and the fee would therefore be between £351 and £5,859.
- 38. Converting a licensed bingo premises to an adult gaming centre would require an operator to pay a fee to the relevant licensing authority to vary the premises licence

- accordingly. Premises licence fees in England and Wales vary by licensing authority but are <u>capped</u>. The maximum fee for an application to vary a bingo premises licence in England and Wales is £1,750.
- 39. Data shared with us by the Gambling Commission, which represents its best estimate of disaggregated GGY across bingo venues, suggests that, among operators that mainly or exclusively operate premises categorised by the Bingo Association as high street bingo (rather than bingo clubs or holiday park bingo), less than 1% of GGY is derived from bingo games, and 99% of GGY is derived from gaming machines. This compares with 51% of GGY derived from bingo for operators that mainly or exclusively operate premises categorised by the Bingo Association as bingo clubs, and 55% for operators that mainly or exclusively operate premises categorised by the Bingo Association as holiday park bingo. We will use responses to this consultation to supplement this initial view and develop a more granular picture of the GGY mix among different types of premises in the licensed bingo sector to make an evidenced estimate of the impact on GGY to different types of premises as a result of the proposals on which we are consulting.
- 40. Any bingo premises converting to an adult gaming centre licence would no longer have the option to serve alcohol on the premises, due to alcohol being prohibited by regulations in adult gaming centres. This may have an impact on overall sales for those bingo venues that currently serve alcohol that choose to convert to adult gaming centre licences.
- 41. We welcome further evidence related to GGY, costs or other impacts that such conversions may entail.

Adjusting premises

- 42. Bingo licensees with premises with limited facilities for bingo could also adapt venues so as to meet requirements related to provision of a bingo area. This would be likely to require expansion of the existing facilities for bingo and moving cabinet and in-fill gaming machines from that space. In venues where there was no space for gaming machines to be moved, this would result in a reduction in the overall number of gaming machines available on the premises. We welcome further evidence on any impacts related to costs or impacts on GGY that such adaptation may have.
- 43. Granular official data on the number of bingo premises that are gaming machine-led is not available, but data from the Bingo Association shows that the number of registered high street bingo venues was 218 in 2024, and we expect that many of these venues predominantly site gaming machines. We will seek further information and data in this area as part of the consultation process.

Impacts on consumers

44. The proposals set out in this consultation would ensure there is a dedicated area for bingo available to customers in all licensed bingo premises. This would ensure that customers are presented with a mixed offering of gambling activities which includes a

minimum level of facilities for bingo in all licensed bingo premises.

45. We expect the proposals would improve consumers' awareness of the characteristics of premises that they are visiting or which apply for a premises licence in their area. It would increase the likelihood that customers can recognise a licensed bingo venue as such and understand the appropriate multi-operator self-exclusion scheme to use if they wish to self-exclude. It will also ensure a more consistent approach to rules related to the ability to serve alcohol in premises that are predominantly made up of gaming machines, that is to say, a prohibition on serving alcohol in such premises (excluding casinos).

Consultation questions

Respondent type

1. Are you responding on behalf of an organisation or as an individual? (Individual / Organisation / Other [please specify])

If individual:

- 2. What is your age? (0 to 17 / 18 to 24 / 25 to 44 / 45 to 64 / 75 to 84 / 85+ / Prefer not to say)
- 3. What part of Great Britain do you live in? (England/ Scotland / Wales / Outside of Great Britain (please specify) / Prefer not to say)
- 4. Which of the following best describes your interest in gambling policy (select up to two options)? (Gambling industry professional, gambling researcher/academic, gambling treatment provider, personally harmed by gambling, personally affected by another person's gambling, recreational gambler, government/regulatory professional, other, prefer not to say)
- 5. Is any of the information you have provided confidential, commercially sensitive or otherwise unsuitable for publication (including in anonymised)? If so, please indicate what. (Free text box)

If organisation:

- 6. What is the name of your organisation? (Free text box)
- 7. Is the organisation headquartered in Great Britain? (Yes / No / I don't know)
- 8. Which of the following best represents your organisation's sector? (Licenced bingo operator, Licenced AGC operator, Licenced FEC operator, Unlicensed FEC operator, Other gambling operator, Gambling-related sector (e.g. advertising, sport, or broadcasting), Government/regulator, Lived experience peer support charity, Academic/research, Treatment provision, Other (please specify), I don't know)
- 9. How many employees does your organisation have globally? (1-9 / 10-19 / 20-49 / 50- 99 / 100 249 / 250 499 / 500+ / I don't know)
- 10. Are you happy for the Government to attribute responses to your organisation in a published response to this consultation? (Yes / No)
- 11. Is any of the information you have provided confidential, commercially sensitive or otherwise unsuitable for publication (including in anonymised)? If so, please indicate what. (Free text box)

Category D gaming machines section

Crane grab machines

Blurb: The Government is proposing to maintain the maximum stake for crane grab machines at £1 and increase the maximum prize for crane grab machines from £50 to £75.

- Should the stake limit on crane grab machines be maintained at £1? (Yes / No, the stake limit should be lower than £1 / No, the stake limit should be higher than £1 / I don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 2. Should the prize limit on crane grab machines be increased from £50 to £75? (Yes / No, the prize limit should be lower than £75 / No, the prize limit should be higher than £75 / I don't know) Please explain your answer, providing any supporting evidence where available. (Free text box)

Non-money prize (other than crane grab machines)

Slot-style non-money machines

- 3. Should the existing non-money Category D (other than crane grab machine) category be subdivided to create a new category of non-money 'slot-style' machines? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 4. If this new category is created, should stakes and prizes for non-money slot-style machines be maintained at 30p and £8, respectively? (Yes / No, stakes and prizes should be set at a lower level / No, stakes and prizes should be set at a higher level / No, stakes and limits should change in another way / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)

The definition the government is proposing for slot-style machines is based on the definition of a reel-based game, and is similar to the definition used for online slot games. A reel-based game in this context would refer to: games where moving or changing images or text are displayed by the use of reels, visual representations of reels or other means, and an individual may win a prize or other opportunity or advantage, as represented by the resulting arrangement of those images or text.

- 5. Should slot-style machines be defined as machines that are reel-based, according to the definition provided above? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 6. Does the definition proposed adequately capture all forms of physical 'slot-style' Category D machines, including older mechanical ones? (Yes / No / Don't know)

- a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 7. Are there other types of non-money prize machines or gameplay mechanics, beyond those that might be defined as 'reel-based', that you believe the Government should not consider an increase in stakes and prizes for due to their visual appearance, gameplay, or psychological characteristics? (optional)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)

Non-slot style machines

- 8. Which approach do you think should be taken in relation to non-slot style, non-money machines stake and prize limits? ((A) Remain at a maximum stake of 30p, and a maximum prize of £8, / (B) Increase to a maximum stake of 40p, and a maximum prize of £15, (C) / Increase to a maximum stake of 50p, and a maximum prize of £20 / (D) Change in another way / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box).
- 9. If you have any views on how the government's proposal to increase stake and prize limits on non-money prize machines **could support the FEC sector**, providing any supporting evidence where available? (Free text box)
- 10. If you have any views on how the government's proposal to increase stake and prize limits on non-money prize machines could have unintended adverse consequences, please provide them here, along with any supporting evidence where available. (Free text box)
- 11. If you have any views about the impact of an increase in stakes and prizes not considered above, please provide them here. We particularly welcome evidence on the estimated impacts of the options on gross gambling yield (GGY), investment and jobs, gambling-related harm, participation by children and young people, to support options assessment. (Free text box)

Coin pushers and penny falls

Blurb: Currently, there are two types of pusher-style machines:

Pusher-style machines that pay out in on-money prizes. Maximum stake of 30p and maximum prize of £8 (non-money). These machines are currently categorised as non-money prize machines.

Coin pusher machines that pay out in money and non-money prizes. Maximum stake of 20p and maximum prize of £20 (of which no more than £10 can be a money prize)

12. Should a new category of machine, 'pushers', be created which combines pusher-style machines that pay out in non-money prizes with combined money and non-money prize coin pushers? (Yes / No / Don't know)

- a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 13. Are there technical and cost implications associated with introducing a unified 'pusher' category? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 14. Should the stake limit for unified 'pushers' be set at 30p, in line with the current stake limit for pusher machines that pay out in tickets? (Yes / No, the stake limit should be lower / No, the stake limit should be higherer / No, the stake limit should change in another way / Don't know)
 - a. Please explain your answer, providing any supporting evidence on impact where available. (Free text box)
- 15. Should the maximum prize for unified 'pushers' be set at a £20 maximum prize (of which no more than £12 can be a money prize)? (Yes / No, the prize limit should be lower / No, the prize limit should be higher / No, the prize limit should change in another way / Don't know)
 - a. Please explain your answer, providing any supporting evidence on impact where available. (Free text box)
- 16. If you have any views on how the government's proposal to increase stake and prize limits on pusher machines could support the FEC sector, please provide them here, along with any supporting evidence where available. (Free text box)
- 17. If you have any views on how the government's proposal to increase stake and prize limits on pusher machines could have unintended adverse consequences, please provide them here, along with any supporting evidence where available. (Free text box)

Combined money and non-money prize machines (other than coin pusher or penny falls machines)

- 18. Should any changes be made to stake and prize limits for combined money and non-money prize machines? (Yes, stake and prize limits for combined money and non-money prize machines should be lower / Yes, stake and prize limits for combined money and non-money prize machines should be higher / Yes, stake and prize limits for combined money and non-money prize machines should be changed in another way / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)

General - stakes and prizes

19. What is the estimated impact of the package of proposals on Gross Gambling Yield in the family entertainment centre (FEC) sector? (Significant increase/ Slight

increase/ No change/ Slight decrease/ Slight decrease/ Significant decrease, Don't know)

- a. Please explain your answer, providing an estimated GGY impact in £ where possible. (Free text box)
- 20. What is the estimated impact of the package of proposals on investment in the FEC sector? (Significant increase/ Slight increase/ No change/ Slight decrease/ Slight decrease/ Significant decrease, Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 21. What is the estimated impact of the package of proposals on jobs in the FEC sector? (Significant increase/ slight increase/ no change/ slight decrease/ slight decrease/ Significant decrease, Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 22. What is the estimated impact on gambling-related harm in the FEC sector? (Significant increase/ slight increase/ no change/ slight decrease/ slight decrease/ Significant decrease, Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box).
- 23. What is the estimated impact on participation by children and young people in the FEC sector? (Significant increase/ Slight increase/ No change/ Slight decrease/ Significant decrease, Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 24. Are there any other impacts of the proposed changes to Category D gaming machines not covered by the questions above? (Free text box)

Introduction of an age limit on 'cash-out' Category D slot-style machines (all optional)

- 25. Does anything in this consultation affect your view on the Government's previously announced proposal to make it an offence for a person to invite, cause or permit a child or young person to use 'cash-out' Category D slot-style gaming machines? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 26. Are there any other factors, outside of the content of this consultation, that affect your view on the Government's proposal to make it an offence for a person to invite, cause or permit a child or young person to use 'cash-out' Category D slot-style gaming machines? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)

- 27. Does anything in this consultation, or any other factor, affect your view on the proposal not to require 'cash-out' Category D slot-style machines be moved to age-restricted areas in venues? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)
- 28. Do you have any views on the measures venues should adopt to ensure that no under-18s play on cash-out Category D slot-style machines if the age limit is introduced? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)

Questions for FEC operators

- 29. Please provide data on the number of Category D machines in your premises, broken down by sub-category. (Table by sub-category)
 - a. Please upload any additional evidence, where applicable. (File upload)
- 30. Please provide the latest data on Gross Gaming Yield (GGY) for Category D machines in your premises in the 2024/25 financial year, including any breakdowns by machine sub-category. If possible, please provide historical data, indicating trends over the past three years or more. (Table by subcategory)
 - a. Please upload any additional evidence, where applicable. (File upload)
- 31. Please provide any available data on current stakes and prizes in operation on Category D machines in your premises, by subcategory or type of machine. (Table by subcategory)
 - a. Please provide any supporting evidence, where available. (Free text box)
 - b. Please upload any additional evidence, where applicable. (File upload)
- 32. Please provide any available data or other information you collect related to player behaviour (such as average net expenditure and session length) on Category D machines in your premises, by subcategory or type of machine. (Table by subcategory)
 - a. Please provide any supporting evidence, where available. (Free text box)
 - b. Please upload any additional evidence, where applicable. (File upload)
- 33. Please provide any available data or other information you collect related to the effectiveness of responsible gambling measures on Category D machines in your premises, by subcategory or type of machine. (Table by subcategory)
 - a. Please provide any supporting evidence, where available. (Free text box)
 - b. Please upload any additional evidence, where applicable. (File upload)
- 34. Please provide any available data or other information you collect related to the proportion of players using 'cash-out' Category D slot-style machines that are under 18 on Category D machines in your premises.
 - a. Please provide any supporting evidence, where available. (Free text box)

b. Please upload any additional evidence, where applicable. (File upload)

Bingo licensing section

The Bingo Area

- Should there be an area in licensed bingo premises dedicated to facilities for bingo? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence where available. (Free text box)

Minimum floor space for the bingo area

There are four options being considered for the percentage of the total premises floor space that should be dedicated to the bingo area:

- A) No minimum percentage of floor space dedicated to the 'bingo area'
- B) 30% dedicated to the 'bingo area'
- C) 40% dedicated to the 'bingo area'
- D) 50% dedicated to the 'bingo area'
- 2. Please rank these four options in order of preference, where 1 is the most preferable. Select each option to move its position in the ranking.
 - a. Please explain your answer, providing supporting evidence where available. (Free text box)

Gaming machines in the bingo area

- 3. Do you agree with the Government's proposal that cabinet and in-fill gaming machines should not be permitted within the bingo area? (Yes / No / Don't know)
 - a. Please explain your answer, providing any supporting evidence. We particularly welcome evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available. (Free text box)
- 4. Do you agree with the Government's proposal that all tablet gaming machines permitted in the bingo area should offer bingo? (Yes / No, tablet gaming machines permitted in the bingo area should not have to offer bingo / No, only some tablet gaming machines permitted in the bingo area should offer bingo / No, no tablet gaming machines should be permitted in the bingo area / No (for another reason) / I don't know)
 - a. Please explain your answer, providing any supporting evidence. (Free text box)
- 5. Do you agree with the Government's preferred approach that there should be a minimum distance between the bingo area and any cabinet or in-fill gaming machines

in a bingo premises? (Yes, there should be a minimum distance / No, there should not be a minimum distance / I don't know)

- a. Please explain your answer, providing any supporting evidence. (Free text box)
- 6. Which of the proposed minimum distances between the bingo area and any cabinet or in-fill gaming machines would be most appropriate? (A: 0.5m / B: 1.0m / C 2.0m / D: An alternative distance would be more appropriate (please provide a distance))
 - a. Please explain your answer, providing any supporting evidence. (Free text box)

Gaming machine content on EBT's

- Option A) In licensed bingo venues, all gaming machine content currently permitted (Category B3, B4, C and D content) in bingo venues should be permitted in the bingo area on tablets that offer electronic bingo
- Option B) In licensed bingo venues, only Category C and D gaming machine content should be permitted in the bingo area on tablets that offer electronic bingo
- Option C) In licensed bingo venues, no tablet gaming machines should be permitted in the bingo area

The Gambling Commission provides an overview of gaming machine categories here.

- 7. The Government's preferred option is to permit all currently permitted categories of gaming machine content on tablets that offer electronic bingo in the bingo area (Option A). Do you agree with this preferred option? (Yes, I agree with Option A / No, I prefer Option B / No, I prefer Option C / No (another reason) / Don't know)
 - a. Please explain your answer, providing supporting evidence. We particularly welcome evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available. (Free text box)

Positions in the bingo area

There are four options in relation to positions in the bingo area.

- A. No minimum positions
- B. Minimum of 30 positions in the bingo area
- C. Minimum of 40 positions in the bingo area
- D. At least one distinct position for every 2.5 square meters of floor space in the bingo area up to 200 square metres. Where the bingo area is over 200 square metres in size, a minimum of 80 positions only. There should be a minimum of 30 positions for bingo in the bingo area, no matter how small the venue.
- 8. Do you agree with the government's proposal that there should be a requirement for a minimum number of positions in the bingo area? (Yes / No / I Don't know)

- a. Please explain your answer, providing supporting evidence where available. We particularly welcome supporting evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available. (Free text box)
- 9. Please rank the proposed options in order of preference (A, B, C, D), where 1 is the most preferable. Select each option to move its position in the ranking. (A: No minimum positions in the bingo area / B: Minimum of 30 positions in the bingo area / C: Minimum of 40 positions in the bingo area / D: At least one distinct position for every 2.5 square metres of floor space in the bingo area up to 200 square metres in size, a minimum of 80 positions only. There should be a minimum of 30 positions for bingo in the bingo area, no matter how small the venue.
 - a. Please explain your ranking in the question above, providing supporting evidence where available.(Free text box)
- 10. In the government's view, a position is a space for a customer to play bingo while seated, which is recognisable as such, providing a surface for paper or electronic play of bingo. A distinct position would be a seat or wheelchair space where a single customer can play bingo unimpeded while seated. For example, a single table with four seats would count as four positions. We would not consider a seat primarily intended for use at a non-EBT gaming machine to be counted as a position for bingo.

Do you agree with this definition? (Yes / No / Don't know)

11. What other considerations would be important to note, when defining a position for bingo? (Free text box)

Other features of the bingo area

- 12. Beyond proposals relating to percentage of floor space, the types of gaming machine permitted in the bingo area, and a minimum number of positions, are there any other conditions that should be applied to the bingo area? (Yes / No / Don't know)
 - a. Please explain your answer, providing supporting evidence where available. (Free text box)

Transitional arrangements

- 13. Please provide any views on the possible challenges, or practical considerations, do you anticipate during an implementation period for new requirements for bingo premises? Please explain your answer, providing supporting evidence where available. (Free text box)
- 14. How long, in months, would an appropriate implementation period need to be for the following groups: Existing licensed bingo premises and New Bingo premises (applying for a license in future)? (Free text box)

- a. Please explain your answer, providing supporting evidence where available.
 (Free text box)
- 15. Please provide an estimated one-off cost to <u>licensing authorities</u> to implement the proposed changes to the bingo licensing regime. Please explain your answer, providing supporting evidence where possible. (Free text box)
- 16. Please provide any other views on the administrative burden associated with these proposals for <u>licensing authorities</u>. Please explain your answer, providing supporting evidence where available. (Free text box)
- 17. Please provide views on the enforceability of these proposals. Please explain your answer, providing supporting evidence where available. (Free text box)

General

- 18. Do you anticipate the proposed changes to bingo licensing having particular impacts on gambling-related harm? (Yes, they will increase gambling-related harm / Yes, they will have a mixed impact on gambling-related harm / No / I don't know)
 - a. Please explain your answer, providing supporting evidence where available. (Free text box)
- 19. Are there any other impacts of the proposed changes to bingo licensing not covered by the questions above? (Yes / No / I don't know)
 - a. Please explain your answer, providing supporting evidence where available.
 (Free text box)

Questions for bingo operators

20. How many licensed bingo premises do you operate? (Free text box)

Minimum floor space for the bingo area

- 21. Please provide information or evidence (e.g. floor plans) related to the venues you operate to show the proportion of floor space dedicated to:
 - Areas occupied by facilities for bingo
 - Areas occupied by gaming machines
 - Areas occupied by other facilities

(Free text box)

- a. Please upload any additional evidence, where applicable (File upload)
- 22. How many of your bingo premises would you need to adapt to meet the requirements in this consultation under each of four options being considered for the percentage of the total premises floor space that should be dedicated to the bingo area (A, B, C, D), if you did not convert any premises to adult gaming centres? Please state 'none' where you would not need to adapt any premises (Free text box)

- 23. Do you expect that you would convert any premises to adult gaming centre licences under these options? (Yes / No / Don't know)
- 24. How many premises do you expect that you would convert any premises to adult gaming centre licences under these options (A, B, C, D)? Please state 'None' where you do not expect to convert any premises. (Free text box)
- 25. What would be the main reasons for converting premises to adult gaming centre licences? (Free text box)
- 26. If you were to adapt all premises to meet the requirements related to the bingo area under Option B (30% of floor space dedicated to the 'bingo area'), what impact would this have on the below outcomes? GGY from bingo games, GGY from gaming machines, Number of gaming machines, Annual operating costs (Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)
- 27. If you were to adapt all premises to meet the requirements related to the bingo area under Option C (40% of floor space dedicated to the 'bingo area'), what impact would this have on the below outcomes? GGY from bingo games, GGY from gaming machines, Number of gaming machines, Annual operating costs (Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)
- 28. If you were to adapt all premises to meet the requirements related to the bingo area under Option D (50% of floor space dedicated to the 'bingo area'), what impact would this have on the below outcomes? GGY from bingo games, GGY from gaming machines, Number of gaming machines, Annual operating costs (Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)
 - a. Please explain your answers (Q50, Q51, Q52), providing supporting evidence where available. (Free text box)
- 29. If, under the requirements of Option B, you were to convert all premises with less than 30% of floor space dedicated to bingo to adult gaming centres what impact would this have on the below outcomes? Overall GGY, Number of gaming machines, annual operating costs (Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)
- 30. If, under the requirements of Option C, you were to convert all premises with less than 40% of the floor space dedicated to bingo to adult gaming centres what impact would this have on the below outcomes? Overall GGY, Number of gaming machines, annual operating costs (Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)
- 31. If, under the requirements of Option D, you were to convert all premises with less than 50% of floor space dedicated to adult gaming centres what impact would this

have on the below outcomes? Overall GGY, Number of gaming machines, annual operating costs (Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)

- a. Please explain your answers, (Q53, Q54, Q55) providing supporting evidence where available. (Free text box)
- 32. Please provide a monetary estimate of the approximate one-off cost required to adapt a premises you operate to meet the bingo area requirements under each of these options (B, C, D).
 - B) 30% dedicated to the 'bingo area' (free text box)
 - C) 40% dedicated to the 'bingo area' (free text box)
 - D) 50% dedicated to the 'bingo area' (free text box)
 - a. Please provide supporting evidence where possible. (Free text box)
 - b. Please upload any additional evidence, where applicable. (File upload)
- 33. If you operate at least one licensed bingo premises where floor space dedicated to an area for bingo is less than 50% of venue floor space, please provide an approximate breakdown of the key revenue streams for the premises (for example, bingo, gaming machine, food and beverage, alcohol sales). (Free text box)
 - a. Please upload any additional evidence where applicable. (File upload)

Gaming machines in the bingo area

34. If available, please provide a breakdown of the number of machines and gross gambling yield from gaming machines in your bingo premises, split by device (i.e. tablet vs in-fill/cabinet machines) and category of machine. (Free text box)

Positions in the bingo area

- 35. How would a requirement for a minimum number of bingo positions impact your premises? Please explain your answer, providing supporting evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available. (Free text box)
 - a. Please upload any supporting evidence where applicable (File upload)

Final supporting evidence

36. The Department for Culture, Media and Sport will have due regard to the public sector equality duty, including considering the impact of these proposals on those who share protected characteristics, as provided by the Equality Act 2010. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. 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. (Free text box)

- 37. Please upload any further supporting evidence or any other information that should be considered as part of this consultation relating to the proposed changes and their possible impacts. (File upload)
- 38. Is any of the information you have provided confidential, commercially sensitive or otherwise unsuitable for publication (including in anonymised)? If so, please indicate what. (Free text box)

How to respond

Please respond to this consultation by completing the online response form below: **Start survey**

If you cannot access the link, please send responses to gamblingactreview@dcms.gov.uk in a document format like PDF or Microsoft Word. By submitting your responses via email you are agreeing to the terms outlined in the privacy notice.

We welcome evidence from all parties with an interest in the way that gambling is regulated in Great Britain.

The consultation will close at 11:59pm on 9 January 2026.

Privacy Notice

Who is collecting my data?

The Department for Culture, Media & Sport (DCMS). DCMS is consulting on Category D gaming machines and licensing for bingo premises. For the purposes of personal data collected in the course of this consultation, DCMS is the data controller.

Purposes of this Privacy Notice

This notice is provided to meet the obligations as set out in Articles 13 and 14 of the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("the DPA"). This notice sets out how DCMS will use your personal data as part of our legal obligations with regard to Data Protection.

What personal data do we collect?

The personal information we collect and process is the data provided to us directly by you in the responses to this consultation. As an individual, this includes: your gender, age bracket and region of residence. As an organisation, this includes: your organisation name and size. All questions requesting an individuals personal information offer a 'prefer not to say' option.

How will we use your data?

We will use your data to enable us to carry out our functions as a government department. Your data will be used to inform the development of policy measures relating to Category D gaming machines and licensing for bingo premises

What is the legal basis for processing my data?

To process this personal data, our legal reason for collecting or processing this data is:

Article 6(1)(e) of the UK GDPR: to the extent it is necessary to perform a public task
(to carry out a public function or exercise powers set out in law, or to perform a
specific task in the public interest that is set out in law). In this case, the processing
of your personal data is necessary for the performance of a task in the public interest,
as the information gathered helps inform future policies; and

Section 8(d) of the DPA: to the extent it is necessary for the effective performance of a task carried out in the public interest.

What will happen if I do not provide this data?

You have the option to select 'Prefer not to say' in response to any of the questions that ask for your personal data.

Who will your data be shared with?

DCMS has commissioned a third party, Qualtrics, to collect your personal data on its behalf. This means we have asked Qualtrics to collect your information via an online survey platform, which we will review as part of the consultation process.

Information provided in response to this consultation (not including personal information) may be shared with other government departments and arm's length bodies, such as the Department for Health and Social Care and the Gambling Commission. The information provided may be published at an aggregated or anonymised level in the government's consultation response, or disclosed in accordance with the access to information regimes (primarily under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004) subject to any applicable exemptions.

Please indicate if any information you provide is commercially or otherwise sensitive.

How long will my data be held for?

Your personal data will be kept for one year in line with DCMS retention policy.

Will my data be used for automated decision making or profiling?

We will not use your data for any automated decision making.

Will my data be transferred outside the UK and if it is how will it be protected? Your data will not be transferred outside the UK.

What are my data protection rights?

You have rights over your personal data under the UK GDPR and the Data Protection Act 2018. The Information Commissioner's Office is the supervisory authority for data protection legislation, and maintains a full explanation of these rights on their website DCMS will ensure that we uphold your rights when processing your personal data.

How do I complain?

The contact details for the data controller's Data Protection Officer (DPO) are:

Data Protection Officer
The Department for Culture, Media & Sport
100 Parliament Street
London
SW1A 2BQ

Email: dpo@dcms.gov.uk

If you're unhappy with the way we have handled your personal data and want to make a complaint, please write to the department's Data Protection Officer using the details above.

How to contact the Information Commissioner's Office:

If you believe that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. You may also contact them to seek independent advice about data protection, privacy and data sharing.

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Website: www.ico.org.uk Telephone: 0303 123 1113 Email: casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

Changes to our privacy notice

We may make changes to this privacy policy. In that case, the 'last updated' date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately. If these changes affect how your personal data is processed, DCMS will take reasonable steps to let you know.

Last updated: 08 October 2025

Annex A

Category D gaming machine stakes and prizes in 2007

Category of machine	Maximum Stake	Maximum Prize
D (money-prize)	10p	£5 money prize
D (non-money prize)	30p	£8 non-money prize
D (any other)	10p	£8 (no more than £5 can be a money prize)

Category D gaming machine stakes and prizes in 2009

Category of machine	Maximum Stake	Maximum Prize
D (money-prize)	10p	£5
D (non-money prize)	30p	£8 non-money prize
D (crane-grab)	£1	£50 non-money prize
D (coin pusher/penny fall)	10p	£15 (no more than £8 money prize)
D (other combined money and non-money prize)	10p	£8 (no more than £5 money prize)

Category D gaming machine stakes and prizes since 2014

Category of machine	Maximum Stake	Maximum Prize
D (money-prize)	10p	£5
D (non-money prize)	30p	£8 non-money prize
D (crane-grab)	£1	£50 non-money prize
D (coin pusher/penny fall)	20p	£20 (no more than £10 money prize)
D (other combined money and non-money prize)	10p	£8 (no more than £5 money prize)

Proposed Category D gaming machine stakes and prizes

Category of machine	Maximum Stake	Maximum Prize
D (money-prize)	10p	£5
D (non-money prize slot-style)	30p	£8 non-money prize
D (non-money prize, non-slot style)	30p / 40p / 50p	£8 / £15 / £20 non-money prize
D (crane-grab)	£1	£75 non-money prize
D ('pusher'/penny fall - money and/or non-money prize)	30p	£20 (no more than £12 money prize)
D (other combined money and non-money prize)	10p	£8 (no more than £5 money prize)