



Wales Safer Communities Network response to: Department for Media, Culture and Sport- Proposals for a maximum stake limit for online slots games

Closed 20 September 2023.

Response submitted via the online survey.

Pre consultation demographic questions

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

Wales Safer Communities Network which is a member organisation made up of police, council, fire and rescue, probation and third sector.

- **What part of Great Britain do you live in?** (England / Scotland / **Wales** / Prefer not to say / Outside of Great Britain [please specify])
- **Have you gambled in the past year?** (Yes / No/ **I don't know** / Prefer not to say)

As the response is on behalf of the Network there will be a range of responses from members and therefore our response is true as we have not consulted members on if they gamble or not.

- **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, **affected negatively by another person's gambling**, recreational gambler, **government/regulatory professional**, other, prefer not to say)

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)

No

- **What is the name of your organisation?** (Free text box)

Wales Safer Communities Network which is a member organisation made up of police, council, fire and rescue, probation and third sector.

- **Is the organisation headquartered in Great Britain?** (Yes / No / I don't know)
- **Which of the following best represents your organisation's sector?** (remote gambling industry, land-based gambling industry, both remote and land-based gambling industry, gambling-related sector (e.g. advertising, sport, or

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broadcasting), **government/regulator**, lived experience peer support charity, academic/research, treatment provision, trade association, **local authority/** licensing board, **other**, I don't know)

- **How many employees does the organisation you are responding on behalf of have globally?** (1-9 / 10-19 / 20-49 / 50- 99 / 100 - 250 / 250 - 499 employees / 500+ employees / I don't know)

Community safety is delivered across a number of public, third and private sector bodies and therefore the numbers involved are unknown.

- **Are you happy for government to attribute responses to your organisation in a published response to this consultation?** (Yes / No)
- **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)
No

Consultation questions

Q1) For the purposes of introducing a maximum stake limit, the government intends to align with the definition of online slots used by the Gambling Commission. We therefore intend for the limit to apply to:

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

Q1a) Does this description of online slots adequately describe the products intended for inclusion in the maximum stake limit's scope? (Mandatory response)

Yes

Q1b) Please explain your answer. (Optional response)

We think that using a definition already used by a regulator assists with having a clear and transparent identification system, with only route required for challenge. Whilst the definition could be more specific that would risk excluding some games or enabling more to move outside of being defined as online slot and outside of regulation. The development of technologies such as Artificial Intelligence development of new games may be accelerated and so require an element of flexibility to ensure regulation for fairness.

Q2) The government is developing a description of a maximum stake. This description will be adapted in legislation to introduce a maximum stake limit. The proposed description of a maximum stake is:

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

Q2a) Is this description of stake suitable for the purpose of the introduction of a maximum stake limit for online slots games? (Mandatory response)

Yes

Q2b) Please explain your answer. (Optional response)

We agree with the description provided as it appears clear, however it may be appropriate to make reference to an individual player or player on behalf of a consortium or group. This may make an individual pause and not have an easy option to get around the definition by claiming to be on behalf of a consortium or group of different people or players.

Q3) For the purposes of introducing a maximum stake limit per spin or game cycle, the government intends to align with the definition of game cycle used by the Gambling Commission's Remote Technical Standards. Game cycle is defined as:

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

Q3a) Is this description of game cycle suitable for the purpose of the introduction of a maximum stake limit for online slots games? (Mandatory response)

No

Q3b) Please explain your answer. (Optional response)

Whilst the definition would be adequate under normal circumstances we are concerned that it may leave it open for exploitation. For example, there could be multiple machines being used by an individual player from a single location. It is also open to abuse by closing the game and restarting immediately which could make a limit practically useless and not assist in the prevention of problem gambling and gambling debt therefore it may be more appropriate to have a limit based on accessing funds rather than a stop/start button.

Q4) The government is aiming to introduce a maximum stake limit that strikes an appropriate balance between preventing harm and preserving consumer freedoms.

Q4a) What maximum stake limit for online slot games would you support, if any? (Mandatory response)

I don't know

Q4b) Please explain your answer, providing evidence where possible. (Optional response)

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We don't know because a lower amount such as £2 would limit the speed under which money could be lost but the player may not take note of the amount they are spending as it is only £2. Whereas if it is a higher amount of £10, £15 or £20 then the speed of possible lose and debt increase could happen before they notice but the higher amounts may mean they know the spend and monitor and self-regulate easier.

Where an individual has a known gambling problem the opportunity for restrictions to access or amount that can be spent may need to be limited for their own wellbeing and health.

Q5) The government is seeking a balanced approach to the protection of young adults. We recognise the evidence of risks which can accompany potentially vulnerable young adults gambling on high risk online slots at high stakes, but also that as adults we must treat those aged 18-24 fairly and proportionately.

Q5a) What maximum stake, if any, do you support for young adults aged 18-24? (Mandatory response)

Consistent with the limit for all adults but with extra operator vigilance

Q5b) Please explain your answer and reference any relevant supporting evidence if appropriate. (Optional response)

Having the same standards should enable a true and proper process to be in place and hopefully prevent the use of incorrect dates of birth that may allow the person to make higher debts whilst also making them harder to trace if they require assistance with a gambling habit or addiction.

Q6) The options considered throughout this consultation are likely to have significant impacts on both gambling customers (including those being harmed by gambling) and businesses. Our impact estimates for each option under consideration are considered in full in the consultation stage impact assessment.

Q6a) Are there any additional impact considerations, including on the assumptions in the accompanying impact assessment or on the risk of unintended consequences? (Mandatory response)

I don't know

Q6b) Please explain your answer and provide relevant evidence. We would particularly welcome input on transition costs and on the impacts for small and micro businesses. (Optional response)

We do not have enough direct engagement to know if all additional impacts have been considered on customers and businesses.

Q7) 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.

Q7) 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. (Optional response)

We note that there is no reference to the two additional areas that are considered in Wales:

- Welsh language use – as many of the online slots are built on platforms using the English language the options for those using Welsh may be limited in understanding or in accessing help in Welsh through any of the online help directed to from games.
- Socio-economic – is a characteristic that has to be taken into consideration in Wales and may have an impact on the types and amount that is available to play the online slot games, but the risk of money being lost may have an even greater impact than for others.

Q8) Are there any other factors or points you wish to highlight that have not been considered above? (free text box/ file upload) (Optional response)

The cost of living is likely to have an impact with more people potentially willing to risk a few pounds or pence to win more so they can eat and heat their house. The loss of the money may have a greater impact but not as much as the possibility of winning enough to improve living conditions.

Online gambling is particularly concerning as it can be accessed anywhere and anytime by anyone with a smartphone, tablet or other data enabled device. There is no longer the option of walking away or out of the door as the casino is now carried by the person. This may mean that those with gambling problems or addictions may have to remove themselves from being digitally included which may then have detrimental impacts on their employment options, access to finance and banking apps and digital methods of payment for everyday items and lead to social isolation due to not being able to engage in social media.

We are aware that more action is being taken in regard to problem gambling by HMPPS to try to prevent reoffending due to financial difficulties caused by gambling potentially exasperating other reasons for engagement in criminal activity.

Q9) Please upload any further supporting evidence that you wish to share. (Optional response)

None to be included.