Supplementary consultation – Definition of deposit limits in the Remote Gamblin Software Technical Standards

This print version of the consultation is laid out differently than the online version.

# **Overview**

This supplementary consultation sets out proposals for clarifying the definition of ‘deposit limits’ and other financial limits in our Remote Gambling and Software Technical Standards (RTS). These changes are mainly to improve wording in the RTS and to ensure the gambling system is optimised to enable and empower consumers to maintain awareness and control over their gambling consistent with the aims of our initial consultation to improve consistency and understanding of the types of limits offered.

All stakeholders, including consumers, gambling licensees and members of the public are invited to share their views on these proposals.

# **Why your views matter**

In line with the Commission’s commitments connected with the [**2023 White Paper, High stakes: gambling reform for the digital age**](https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age) we have made changes to our requirements to empower and enable customers gambling online to manage their gambling in ways that work for them, including making it easy to set and keep meaningful financial limits.

These changes will come into effect on 31 October 2025 and are set out in our [**Autumn 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response.**](https://www.gamblingcommission.gov.uk/consultation-response/autumn-2023-consultation-proposed-changes-to-lccp-and-rts-consultation)

Via responses to the consultation for these changes (the initial consultation), engagement with industry and consumer contacts, it has become clear that some operators are changing the way in which they interpret financial limits, in particular deposit limits.

We are therefore running this supplementary consultation to build upon the proposals detailed in the initial consultation, in particular proposals for the definitions of ‘deposit limits’ and other financial limits, to improve consistency across the industry and to improve clarity and transparency about how limits work for consumers.

## Responding to this consultation

Thank you for taking part in this consultation. You can choose to respond to as few or as many areas and questions as you wish to. We will consider all responses.

We ask that stakeholders respond to the consultation using the online survey. If you cannot submit online, responses can also be submitted by post to: **Policy Team, Gambling Commission, 4th Floor, Victoria Square House, Birmingham, B2 4BP.**

We may decide to publish the names of individuals (if responding in a personal capacity) or the organisations they are responding on behalf of on our website as part of the published response(s) to this consultation. In the survey, we ask you to indicate whether or not you provide consent to the Commission publishing:

* your name, if you are responding in a personal capacity, or
* the name of your organisation, if you are replying on their behalf.

If you provide consent, then this information may be placed on our website to provide information about who responded to the consultation exercises. Information about how the Gambling Commission processes your personal information, including a specific section on information we collect as part of a Gambling Commission consultation exercise, can be found in the [Gambling Commission’s Privacy Policy](https://www.gamblingcommission.gov.uk/about-us/guide/privacy-policy).

**The consultation will last for approximately 8 weeks and will close on 30 April 2025.**

# **Introductory questions**

1. What is your name? Name
2. What is your email address?

Email

1. What is the name of your organisation?

Organisation name (if relevant)

1. As part of this consultation, we may decide to publish your name (if you are responding in a personal capacity) or the name of your organisation (if you are responding on your organisation’s behalf) on our website to indicate you responded to this consultation. Do you provide your consent to these details being published?

*(Required)*

*Please select only one item*

I CONSENT to the publication of my name or organisation to indicate I responded to this consultation.

I DO NOT CONSENT to the publication of my name or organisation to indicate I responded to this consultation.

The [**Commission's privacy notice** *<https://www.gamblingcommission.gov.uk/privacy-policy>*](https://www.gamblingcommission.gov.uk/privacy-policy) is available on our website.

*5 Tell us a little bit about you to help us understand your perspective. Are you:*

*Please select only one item*

An academic, responding as an individual

A person, responding in a personal capacity who is or has worked in a gambling business A member of the public

A person representing a charity/non-profit

A person representing a gambling business

A person representing a trade association

A person representing a professional body, including academic organisations

A person representing a licensing authority or other regulator

# **Introductory questions (contd)**

In this section, we ask a number of questions to help us understand the perspective of the responses we receive to inform and tailor our policy decisions.

If you or someone you know is struggling with gambling-related problems, contact the [**National Gambling Helpline**](https://www.gamcare.org.uk/), 0808 8020 133. Free of charge 24 hours a day, 7 days a week.

1. How often do you gamble?

*Please select only one item*

Two or more times a week

Once a week

Less than once a week, more than once a month

Once a month

Every 2 to 3 months

Once or twice a year

Never

1. Have you gambled online in the past four weeks?

*Please select only one item*

Yes

No

1. To what extent do you agree or disagree that in the past 12 months, you or someone close to you has experienced negative consequences as a result of your gambling? Please select only one item.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Prefer not to say

1. To what extent do you agree or disagree that in the past 12 months, you have experienced negative consequences as a result of someone else's gambling? Please select only one item*.*

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Prefer not to say

# **Definition of deposit limits in the Remote Gambling and Software Technical Standards**

In line with the Gambling Commission’s commitments connected with the [**2023 White Paper, High stakes: gambling reform for the digital age**,](https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age) we have made changes to our requirements to empower and enable customers gambling online to manage their gambling in ways that work for them, including making it easy to set and keep meaningful financial limits. These changes will come into effect on 31 October 2025 and are set out in our [**Autumn 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response.**](https://www.gamblingcommission.gov.uk/consultation-response/autumn-2023-consultation-proposed-changes-to-lccp-and-rts-consultation)

Via responses to the consultation for these changes (the initial consultation), engagement with industry and consumer contacts, it has become clear that some operators are changing the way in which they interpret financial limits, in particular deposit limits.

We have concerns that this may be confusing for customers and, importantly, the ‘net’ deposit limits offered by some operators do not meet the proposed definition of ‘deposit limits’ in Remote Technical Standard 12B set out in our initial consultation.

This supplementary consultation sets out proposals for clarifying the definition of ‘deposit limits’ and other financial limits in our Remote Gambling and Software Technical Standards (RTS). These changes are mainly to improve wording in the RTS and to ensure the gambling system is optimised to enable and empower consumers to maintain awareness and control over their gambling consistent with the aims of our initial consultation to improve consistency and understanding of the types of limits offered. If implemented following consultation, these changes would be a further change to RTS 12B in addition to those which are coming into effect on 31 October 2025.

# **Summary of proposals**

## Definition of deposit limits in the Remote Gambling and Software Technical Standards (RTS)

The intention of these proposals is to provide consistency and clarity to how a deposit limit is defined and communicated to customers. We believe this will strengthen customer understanding of deposit limits and how they are applied within remote gambling systems.

To achieve this, we propose a series of improvements to the RTS to strengthen the definition of deposit limits building on those changes made following our initial consultation. Specifically, we propose to:

* revise the RTS relating to financial limits so that, as a minimum and default, ‘gross’ deposit limits must be offered to customers.
* ensure that the term ‘deposit limit’ is used consistently by operators: only this term is used to describe this form of limit to customers, and that the term ‘deposit limit’ is not used for other forms of limit.
* provide increased consumer choice by amending the implementation guidance to allow for ‘net’ limits in addition to other types of limits should the customer choose.

# **Background**

In connection with the 2023 [**White Paper, High stakes: gambling reform for the digital age**](https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age) [(](https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age)the white paper) the Gambling Commission committed to review and consult on requiring operators (or gambling licensees) to improve player-centric tools such as financial limits and activity statements, eg by making deposit-setting mandatory or opted into by default.

In our [**Advice to Government**](https://www.gamblingcommission.gov.uk/about-us/guide/advice-to-government-review-of-the-gambling-act-2005#6ZYFtWrK3D7XhxbtcK9KFB) we signalled our intention to explore the role of customer-led tools as part of our wider work on online protections, including measures to empower and enable all customers to manage their gambling in ways that work for them, including making it easy to set and keep meaningful customer-led financial limits, balanced alongside operator-led protections.

The Commission is committed to ensuring that gambling systems offer the right levels of consumer protections at all points in the customer journey, and we support the previous government’s view that “behavioural barriers and friction should only be used to keep customers safe rather than impede them from taking decisions”.

In Autumn 2023 we launched a [**consultation**](https://consult.gamblingcommission.gov.uk/author/autumn_2023_consultation_lccp_rts/consult_view/)on proposed changes to the Remote Gambling and Software Technical Standards (RTS) to make sure that consumers who want to make use of pre-commitment tools such as deposit limits can do so easily and with the minimum of friction. We published the response to the majority of the consultation proposals on 4 February 2025 [**Autumn 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response**.](https://www.gamblingcommission.gov.uk/consultation-response/autumn-2023-consultation-proposed-changes-to-lccp-and-rts-consultation)

Through our engagement with operators and via responses to the initial consultation, it became clear that some operators are changing the way in which they interpret financial limits, in particular deposit limits. Some have continued to offer ‘gross’ deposit limits that prevent a customer from depositing further monies into their account. However, some have begun to offer ‘net’ deposit limits, where any funds withdrawn during the relevant period are automatically offset against the customer-set deposit limit.

The majority of respondents to our initial consultation supported the proposals for a requirement for all operators to offer deposit limits and, in order to maximise consumer choice, retaining the implementation guidance that licensees could still offer spend and loss limits in addition to deposit limits.  However, in their comments, a significant number of gambling industry respondents were strongly of the view that they should be able to retain the ability to offer ‘net deposit limits’ as a form of deposit limit.

Deposit limits have been consistently available in the remote gambling system for a considerable length of time, and for most of that period have typically been considered a limit on the amount of deposits into an account, without reference to anything else such as withdrawals. We are concerned that the introduction of ‘net’ deposit limits has created inconsistencies in how deposit limits work which has caused confusion and inconsistency for customers. ‘Gross’ deposit limits have historically been most commonly offered by gambling licensees and more evidence of usage and participation in deposit limits is available, compared to other types of limits.

In our view, financial limits termed ‘net’ deposit limits would not meet the definition of ‘deposit limits’ proposed in our initial consultation. Whilst we are of the view that ‘net’ deposit limits would not meet the definition of ‘deposit limits’ proposed in the initial consultation, we are choosing to consult further on this issue to ensure clarity, rather than implement the initial consultation proposals and pursue this as a compliance matter.

We want to ensure that the definition of ‘deposit limits’ in the RTS provides clarity and drives consistency for consumers on the default option while maintaining customer choice for other forms of limit. The earlier proposed RTS 12B wording stated that “As a minimum, the gambling system must offer deposit limits - where the amount a customer deposits into their account is limited over a particular duration’’. The wording used in that proposal concerned the amounts deposited, not the amounts deposited less the amounts withdrawn. If the proposed definition of ‘deposit limit’ set out in the initial consultation was implemented, it would mean that operators who didn’t offer ‘gross’ deposit limits would be in breach of the proposed RTS requirement.

We consider that how limits are described to customers is not always clear or consistent. We have seen examples where ‘net’ deposit limits have been called ‘deposit limits’ or sometimes even loss limits. For example:

Some operators are continuing to offer ‘gross’ or ‘regular’ deposit limits that prevent a customer from depositing further monies into their account for the remainder of the duration of the limit, once their limit is met. This represents how ‘deposit limits’ has been interpreted in common practice since RTS 12 – Financial limits was introduced.

Some operators are offering what they term ‘net deposit limits’, where any funds withdrawn during the period are automatically offset against the customer-set deposit limit.

These allow the customer to deposit in excess of the deposit limit, up to the total value of the limit plus the total value of withdrawals made in the period.

RTS 12B also states “All reasonable steps must be taken to ensure that customer-led limits are only increased at the customer’s request, only after a cooling-off period of 24 hours has elapsed and only once the customer has taken positive action at the end of the cooling off period to confirm their request.’’ We are concerned that ‘net’ deposit limits undermine this requirement, as funds withdrawn are automatically offset against the customer-set deposit limit and therefore the limit can frequently change as a result.

Referring to ‘net’ deposit limits as ‘deposit limits’ is potentially misleading as ‘net’ deposit limits automatically enable customers to continue to deposit funds **in excess of their self-determined deposit limit.**

We have also seen examples where operators have changed the nature of deposit limits already set by customers, from a ‘gross’ deposit limit to a ‘net’ deposit limit basis.

Customers have expressed concern in this regard, including:

* not recalling being notified of the change
* the option to revert to ‘gross’ limits had been removed
* the change was confusing and difficult to understand
* some consumers compared ‘net’ limits to previously banned ‘reverse withdrawals’, as they believe that consumers are being encouraged to gamble more than they intended

We are therefore concerned that this:

* causes confusion for customers
* prevents the customer being able to make a proactive and informed choice as to what financial limits are right for them limits consumer empowerment and choice.

We are also concerned the continuation of moving customers from a ‘gross’ deposit limit to a ‘net’ deposit limit could lead to ‘gross’ deposit limits being phased out as an option for customers, therefore reducing consumer choice.

Stakeholders may not have fully considered these different types of ‘deposit limit’ when submitting their original responses. In particular, non-industry respondents may not have considered the distinctions between gross or regular deposit limits and net deposit limits, and the support from industry respondents was largely conditional on ‘net deposit limits’ falling within the deposit limit definition.

We are therefore running this supplementary consultation to build upon the proposals detailed in the initial consultation, in particular proposals **for the definitions of ‘deposit limits’** and other financial limits, to improve consistency across the industry and to improve clarity and transparency about how limits work for consumers.

# **Developing these proposals**

We have already decided to proceed with changes to our requirements, coming into effect on 31 October 2025 to:

* empower consumers to maintain awareness and control over their gambling
* help all consumers gamble in ways that work for them
* increase consistency of how financial limits are applied across the gambling system.

In building upon these changes and developing the proposals set out in this supplementary consultation, we have:

* analysed responses to our initial consultation and pre-consultation engagement on this theme
* commissioned a bespoke consumer survey of online gamblers to gain insight on awareness and usage of financial limits
* analysed Gambling Commission complaints data.

The following themes which have emerged from this work include:

* financial limits, in particular deposit limits, have recently begun to be applied by operators inconsistently, leading to financial limits being applied differently across the industry
* having different interpretations and applications of deposit limits is likely to be confusing for customers and is a barrier to them making informed choices about which budgeting tools work for them
* financial limits termed ‘net’ deposit limits undermine the requirement proposed in our initial consultation, as funds withdrawn are automatically offset against the customer set deposit limit and therefore the limit can frequently change as a result
* some customers have reported being moved from ‘gross’ to ‘net’ deposit limits without their active consent which raises concerns about ‘overriding’ a customer’s preferred limit type; this could be perceived as untransparent and unfair to customers
* if current practices continue there is a risk of ‘gross’ deposit limits being phased out as an option for customers, therefore reducing choice and not meeting with consumer expectation that ‘gross’ should be made available.

# **Responses to our initial consultation**

## Definition of limits

The majority of respondents to our initial consultation supported the proposals for a requirement for all operators to offer deposit limits and, in order to maximise consumer choice, retaining the implementation guidance that licensees could still offer spend and loss limits, in addition to deposit limits.

However, in their comments, a significant number of gambling industry respondents were strongly of the view that they should be able to retain the ability to offer ‘net deposit limits’ as a form of deposit limits for the purposes of compliance with the RTS.

Support for the definitions of spend and loss limits was more mixed, and we received feedback related to how calculations of loss would be made in relation to settled bets, treatment of bonus funds in relation to financial limits, and links to definitions of net loss for the purposes of financial risk assessments.

Further details can be found in the customer-led tools consultation response document. [**Autumn 2023 consultation – Proposed changes to LCCP and RTS:**](https://www.gamblingcommission.gov.uk/consultation-response/autumn-2023-consultation-proposed-changes-to-lccp-and-rts-consultation) [**Consultation Response**.](https://www.gamblingcommission.gov.uk/consultation-response/autumn-2023-consultation-proposed-changes-to-lccp-and-rts-consultation)

# **Awareness and usage of financial limits**

In July 2024 we commissioned research, in partnership with Yonder, to explore consumer experiences of using deposit limits ([**Exploring consumer journeys using deposit limits)**](https://www.gamblingcommission.gov.uk/report/exploring-consumer-journeys-using-deposit-limits) [**previous research into customer-led tools**.](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/exploring-consumer-journeys-using-customer-led-tools#:~:text=This%20release%20contains%20key%20findings%20from%20recent%20research%20exploring%20consumer) This research focuses on awareness and usage of financial limits, experiences of using deposit limits, understanding around the different types of deposit limits (namely, ‘net’ and ‘gross’) and the intent to use ‘net’ or ‘gross’ deposit limits in the future. This research consists of an online self-report survey where data was collected from 1,019 adults (those aged 18 years and over) who have gambled in the last 12 months.

## Participation and usage

Prevalence among respondents to the consumer survey was relatively high in comparison to our [**impact metrics**,](https://www.gamblingcommission.gov.uk/about-us/impact-metric/ro1-protecting-from-harm-or-exploitation/customer-awareness-and-use-of-gambling-management-tools) with 19 percent having used financial limits in the last 12 months. Of those, deposit limits were the most common (58 percent), closely followed by spend limits (47 percent). Only a fifth (22 percent) had used loss limits. However, we cannot fully guarantee that survey respondents understood the Remote Gambling and Software Technical Standards (RTS) definitions as we are aware that limits are named differently in gaming systems. For example ‘net’ deposit limits being referred to as spend limits.

## Deposit limit experience

Users of deposit limits (all respondents that reported having ever used a deposit limit) were generally positive about their experience, with around 70 to 75 percent agreeing to the positive statements.

## Scenarios

The respondents (which included those who reported that they had gambled online and those who no longer gambled online but had previously used financial limits) were split into 2 groups – ‘net’ and ‘gross’, each were shown questions relating to each limit. For both scenarios, comprehension was poor which suggests there is a challenge for operators to fully explain how limits work, regardless of the type. We also asked how confident each group were that they gave the correct answer.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Limit group | Correct answer | Incorrect answer | Don’t know | Very confident | Somewhat | Not very | Not at all |
| Net | 43 | 44 | 13 | 48 | 29 | 17 | 6 |
| Gross | 46 | 39 | 16 | 43 | 30 | 22 | 6 |

We explained to each group how ‘their’ limit worked and asked if they would consider using the limit in the future.

|  |  |  |  |
| --- | --- | --- | --- |
| Limit group | Would use | Would not use | Don’t know |
| Net | 20 | 61 | 19 |
| Gross | 32 | 54 | 15 |

People in the ‘gross’ group were (statistically significantly) more likely to use a ‘gross’ limit in the future than the people in the ‘net’ group were to apply a ‘net’ deposit limit.

This suggests that some consumers may be less comfortable with setting a ‘net’ limit.

Respondents who were shown the ‘gross’ deposit limit scenario, 32 percent indicated that they would consider using a ‘gross’ deposit limit in the future. In contrast, only 20 percent of respondents who were shown the ‘net’ deposit limit scenario indicated that they would consider using a net deposit limit in the future.

Both groups of respondents were asked to explain the reasons behind why they would or would not consider using their respective type of deposit limit. In both the ‘net’ deposit limit group and the ‘gross’ deposit limit group, the most common reasons for not wanting to use the relevant type of limit related to respondents’ belief that they could manage their own gambling without the use of a deposit limit. However, respondents in the ‘net’ limit group referenced that they felt ‘net’ deposit limits seemed complicated or confusing which would be a cause for concern if that was the only type offered.

# **Consumer complaints**

During January to December 2024 the Commission received 46 contacts from consumers raising comments about the use of ‘net’ deposit limits in the gambling system. Whilst this is a small number of individual contacts, the contacts illustrated the potential issues associated with differing interpretations of deposit limits. Comments included:

* Concerns about the potential impact ‘net’ deposit limits may have on individuals experiencing gambling related harm as people perceived the practice as a way of encouraging people to gamble more than they intended
* Consumers compared ‘net’ deposit limits to being similar to the now banned practice of reverse withdrawals
* ‘Net’ deposit limits were perceived as a barrier to consumers being able to access their winnings
* Concerns were raised about the rolling nature of limits
* Consumers commented that the practice of ‘net’ deposit limits undermines the idea of imposing a limit
* expressions of dissatisfaction about how ‘net’ deposit limits worked
* Concerns were raised about the practice being potentially unfair and misleading
* Calls from consumers for regulatory intervention by the Gambling Commission
* Call for ‘gross’ deposit limits to be the default option

# **Detailed proposals**

The remote gambling and software technical standards (RTS) are issued by the Gambling Commission under section 89 and section 97 of the [**Gambling Act 2005 (opens in new tab)**](http://www.legislation.gov.uk/ukpga/2005/19/contents) (the Act).

The RTS is drafted in a format that sets out the key principles, without being overly prescriptive as to how these must be met. The general makeup and format of each requirement is structured as follows:

* **the aim** - describing what the Commission is seeking to achieve
* **the requirement** - which sets out specific requirements to meet the aim, and
* **implementation guidance** - providing guidance as to how the requirement should be complied with, without exhaustively describing all possible solutions. Licensees may adopt alternative approaches to those set out in the guidance provided they can meet the requirement in full and can demonstrate that an alternative approach is reasonable and similarly effective in the particular circumstances.

In this supplementary consultation we are making 3 proposals:

* to strengthen and provide clarity on the definition of a deposit limit, for the purpose of compliance with the proposed requirement.
* to ensure that only limits that meet the definition of a deposit limit can be referred to and communicated to customers as a “Deposit Limit”.
* to introduce new implementation guidance to include ‘net’ limits as another option for financial limits and makes some minor amendments to the wording of definitions.

As per the previous consultation on Customer-led tools, the proposed changes would apply to all online gambling, except subscription lotteries.

As a reminder, we have included the proposals included in the Autumn 2023 consultation and the current wording of RTS implementation guidance 12A.

## Previous consultation proposals

In the Autumn 2023 consultation on Customer-led tools, we proposed that customers must all have the opportunity to set deposit limits, and in order to meet consumer choice, gambling licensees could also continue to offer spend limits and/or loss limits. We considered that offering a common type of financial limit across all gambling licensees would be beneficial for consumers in terms of improving understanding of how limits work, and would enable consumers to use the same type of limit across more than one account.

We also proposed to codify our expectation that the gambling system must prevent a customer from depositing, staking or spending, or incurring further losses from the point at which the customer-set limit is reached, until the limit period ‘restarts’.

**Proposed wording set out in the Autumn 2023 Consultation**

|  |
| --- |
| **RTS requirement 12B**  As a minimum, the gambling system must offer deposit limits - where the amount a customer deposits into their account is limited over a particular duration.  The period/duration of the limits on offer must include:  i. 24 hours and  ii. 7 days and  iii. one month  Where a customer sets simultaneous time frames, for example a daily deposit limit and a weekly limit, the lowest limit must always apply. Therefore if a daily deposit limit of £10 and a weekly limit of £100 are both set then the maximum the system must allow to be deposited is £10 per day and £70 per week.  The gambling system must prevent a customer from further gambling activity once a limit is reached, until the defined period of the limit restarts or the customer takes action to increase the limit.  **RTS implementation guidance 12B**  In order to maximise consumer choice, operators could also offer:  spend limits: where the amount a customer spends on gambling (or specific gambling products) is restricted for the period/duration of the limit applied, and/or loss limits: where the amount lost is restricted, i.e. winnings subtracted from the amount spent for the period/duration of the limit applied. |

## Current position

As noted, in our response to the Autumn 2023 consultation, deposit limits have recently been interpreted by operators in different ways, such as offering net deposit limits instead of or alongside regular or gross deposit limits.

We wanted to run this supplementary consultation exercise and therefore, we did not proceed with the specific requirements and implementation guidance proposed in the Autumn 2023 consultation specifically about the definitions of financial limits. As a result, the relevant sections - RTS implementation guidance 12A - of the current RTS provisions remain in effect until any changes that arise from this supplementary consultation.

**RTS implementation guidance 12A – current wording**

a. Limits could be in the form of:

i. deposit limits: where the amount a customer deposits into their account is limited over a particular duration

ii. spend limits: where the amount a customer spends on gambling (or specific gambling products) is restricted for a given period – this type of limit maybe appropriate where the customer does not hold a deposit account with the operator

|  |
| --- |
| iii. loss limits: where the amount lost (that is, winnings subtracted from the amount spent) is restricted (for instance when a customer makes a £10 bet and wins £8, the loss is £2).  b. The period/duration of the limits on offer should include:  i. 24 hours and  ii.7 days and  iii. one month.  Where a customer sets simultaneous time frames, for example a daily deposit limit and a weekly limit, the lowest limit should always apply.  Therefore if a daily deposit limit of £10 and a weekly limit of £100 are both set then the maximum the system should allow to be deposited is £10 per day and £70 per week. |

## Proposals

The intention behind our initial proposals for all operators to offer deposit limits was to “improve consistency across the industry and to simplify the landscape for consumers” and that “offering a common type of financial limit across all gambling licensees would be beneficial for consumers in terms of improving understanding of how limits work, and would enable consumers to use the same type of limit across more than one account”.

In this supplementary consultation we have proposed that this is further clarified so that deposit limits are defined in reference to gross deposit limits.

To meet consumer choice, we also propose to introduce new implementation guidance so that operators who choose to can also continue to offer ‘net’ limits in addition to gross deposit limits, as is the case with spend limits and/or loss limits.

The Commission’s view remains that offering a default type of deposit limit across all operators would be beneficial for consumers in terms of improving understanding of how limits work, and would enable consumers to use the same type of limit across more than one account.

**RTS requirement 12B**

In this supplementary consultation we are making three proposals:

* to strengthen and provide clarity on the definition of a deposit limit, for the purpose of compliance with the proposed requirement.
* to ensure that only limits that meet the definition of a deposit limit can be referred to and communicated to customers as a “Deposit Limit”.
* to introduce new implementation guidance to include ‘net’ limits as another option for financial limits and makes some minor amendments to the wording of definitions.

|  |
| --- |
| **Proposed wording for RTS Requirement 12B** |
| As a default, the gambling system must offer gross deposit limits - where the amount a customer deposits into their account is limited over a particular duration.  Only limits that meet this definition can be referred to as a deposit limit, and limits meeting this definition must be described to a customer as a deposit limit.  The period or duration of the limits on offer must include  i. 24 hours and  ii.7 days and  iii. one month  Where a customer sets simultaneous time frames, for example a daily deposit limit and a weekly limit, the lowest limit must always apply. Therefore if a daily deposit limit of £10 and a weekly limit of £100 are both set then the maximum the system must allow to be deposited is £10 per day and £70 per week.  The gambling system must prevent a customer from further depositing funds once a deposit limit is reached, until the defined period of the limit restarts or the customer takes action to increase the limit. |

# **Consultation Questions**

1. To what extent do you agree with the proposal that as a minimum, the gambling system must offer gross deposit limits?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

*Please select only one item*

Please give your reasons for your answer below.

11 To what extent do you agree with the proposal that only limits that meet the definition of gross deposit limits can be referred to as a deposit limit?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

*Please select only one item*

Please give your reasons for your answer below.

12 To what extent do you agree with the proposal that limits that meet the definition of gross deposit limits must be described to a customer as a deposit limit?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

*Please select only one item*

Please give your reasons for your answer below.

12 If you disagree, how do you think the distinction between gross deposit limits and other financial limits could be made clear to consumers?

1. Do you have any comments on the proposed wording regarding simultaneous time frames?

Please give your views below.

14 Do you have any comments regarding the proposed wording that “The gambling system must prevent a customer from further depositing funds once a deposit limit is reached, until the defined period of the limit restarts or the customer takes action to increase the limit.” ?

Please give your views below.

15 Do you have any other feedback you would like to raise in relation to these proposals?

Please give your views below.

|  |
| --- |
| **Proposed wording in RTS implementation guidance 12B** |
| In order to maximise consumer choice, operators could also offer:   1. spend or stake limits: where the amount a customer spends or stakes on gambling (or specific gambling products) is restricted for the period or duration of the limit applied, and or 2. loss limits: where the amount lost is restricted, i.e. winnings subtracted from the amount lost for the period or duration of the limit applied, and or 3. net limits: the amount deposited into the account minus any withdrawals made for the period or duration of the limit applied. |

16 To what extent do you agree with the proposed definition of spend or stake limits for implementation guidance? “Where the amount a customer spends or stakes on gambling (or specific gambling products) is restricted for the period or duration of the limit applied”

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

*Please select only one item*

Please give your reasons for your answer below.

17 To what extent do you agree with the proposed definition of loss limits for implementation guidance? “Where the amount lost is restricted, i.e. winnings subtracted from the amount lost for the period or duration of the limit applied.”

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

*Please select only one item*

Please give your reasons for your answer below.

18 To what extent do you agree with the proposed term ‘net limits’ and its proposed definition for implementation guidance? “The amount deposited into the account minus any withdrawals made for the period or duration of the limit applied.”

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

*Please select only one item*

Please give your reasons for your answer below.

19 Do you have any other feedback you would like to raise in relation to this proposal?

Please give your views below.

# **Attaching additional information**

If you have any further documents in support of your response, please use the 'choose file' button below

20Attaching additional information

**Please attach a copy of any documents you wish to include to this printout.**

# **Business impact assessment, implementation issues and equalities impact**

In developing these proposals we seek to understand the impact of our proposals on businesses. In our initial consultation we asked respondents to provide information about implementation and an estimate of the associated direct costs. A minority of respondents answered our questions about the proposals detailed in our initial consultation.

Further details can be found in our response document. [**Autumn 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response**](https://www.gamblingcommission.gov.uk/consultation-response/autumn-2023-consultation-proposed-changes-to-lccp-and-rts-consultation). The changes set out in that response document will come into effect on 31 October 2025.

In this supplementary consultation we want to gain a better understanding of the direct costs and development time concerning our proposals for ‘gross’ and ‘net’ deposit limits, to enable us to assess business impact. We are particularly interested in the direct costs and impact on operators of moving from a position where offering other types of limits to gross deposit limits as a default. We understand that this will not apply to all operators and we also understand operators who would be required to make a change may be reverting to an earlier position, which may reduce development costs.

We have not identified a proposed date for implementing any outcomes of this supplementary consultation.

21 Please provide detail of the direct cost and development time associated with implementing the proposals. We would be interested in hearing whether you would choose to only offer gross deposit limits or whether you would offer other types of financial limit as well.

Please give your views below.

# **Equalities considerations**

The Gambling Commission is committed to giving consideration to potential equalities impacts, having regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.

In our initial consultation we asked respondents for any evidence or information which might assist the Commission in considering any equalities impacts of those proposals. We received a small number of responses to help inform the next stage of our assessment in relation to specific proposals which do not form part of this supplementary consultation. These included:

* concerns around neurodivergence and processing or understanding information as well as responses to alerts consideration of cognisance of information for non-English speakers.
* one respondent raised issues of potential vulnerabilities of different groups more generally, in relation to problem gambling and gambling harm.

Further details can be found in our response document. [**Autumn 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response**](https://www.gamblingcommission.gov.uk/consultation-response/autumn-2023-consultation-proposed-changes-to-lccp-and-rts-consultation) .

In this supplementary consultation we propose changes to the RTS that aim to provide consistency, aid consumer understanding and reduce the risk of confusion for customers that use financial limits. The Commission has considered the comments made in response to our initial consultation when developing these proposals. We do not currently consider that the proposals in this supplementary consultation would give rise to known negative impacts and this position will be kept under review. We would welcome views in relation to the same.

Further information: [**Section 149 Equality Act 2010**](https://www.legislation.gov.uk/ukpga/2010/15/section/149)

22 Do you have any evidence or information which might assist the Commission in considering any equalities impacts, within the meaning of section 149 of the Equality Act 2010, in the context of any proposal considered in this supplementary consultation?

Please give your views below.