**January 2025 Consultation on proposed changes to the Gaming Machine Technical Standards, Gaming Machine Testing Strategy and Licence Conditions and Codes of Practice**

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

**Overview**

The Gambling Commission regulates most forms of commercial gambling in Great Britain. We are consulting on proposed changes to our requirements on gambling businesses, through the Gaming Machine Technical Standards (GMTS), Gaming Machine Testing Strategy (testing strategy) and the Licence Conditions and Codes of Practice. All stakeholders, including consumers, gambling businesses (such as those manufacture, supply or make gaming machines available for use), test houses and members of the public, are invited to share their views on these proposals.

**Why your views matter**

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) (opens in new tab) set out a plan for reform of gambling regulation following a review of the Gambling Act 2005.

This consultation package includes the third set of proposed changes to the regulatory framework required to implement the Commission’s commitments as part of that review.

Our consultation on the first set of proposed changes was published in July 2023 and closed in October. Our [consultation response](https://www.gamblingcommission.gov.uk/consultation-response/summer-2023-consultation-proposed-changes-to-lccp-and-rts-consultation) (opens in new tab) was published in May 2024. Our consultation on the second set of proposed changes was published in November 2023 and closed in February 2024. We have published our response in relation to the [Frequency of regulatory returns](https://www.gamblingcommission.gov.uk/consultation-response/frequency-of-regulatory-returns-consultation-response) (opens in new tab). We are currently analysing the consultation responses for our other proposals and will set out further responses in due course. More information on our consultations (including on proposals unrelated to the review of the Gambling Act 2005) is available on our [website](https://www.gamblingcommission.gov.uk/about-us/consultations) (opens in new tab).

**Responding to this consultation**

Thank you for taking part in this consultation. This consultation document covers four areas of proposals, and each has a number of questions. You can choose to respond to as few or as many areas and questions as you wish to. You can choose to respond to each area in whichever order you wish. 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 the organisations, or the individuals who responded on behalf of organisations, on our website as part of the published responses to this consultation. In the survey, we ask you to indicate whether you do or do not consent to the Commission publishing:

* your name
* the name of your organisation, if you are replying on their behalf.

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

**The consultation will last for 16 weeks and will close on 20 May 2025.**

**Introductory questions**

What is your name?

[free text]

What is your email address?

[free text]

What is the name of your organisation?

[free text]

As part of our response to this consultation, where consent is given, we may publish on our website the names of the organisations that responded to the consultation or, if the name of the organisation is not provided, the names of the individual who responded on its behalf.

Please select only one item:

I CONSENT to the publication of the name of my organisation or, if the organisation name has not been provided, the publication of my name 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/about-us/guide/privacy-policy) (opens in new tab) is available on our website.

Tell us a 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 or non-profit

A person representing a gambling business

A person representing an approved test house

A person representing a trade association

A person representing a professional body, including academic organisations

A person representing a licensing authority or other regulator

[Note: the following introductory questions covering gambling behaviour and exposure to negative consequences as a result of gambling are only asked of the following types of respondents:

* 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.

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/) (opens in new tab), 0808 8020 133 free of charge 24 hours a day, 7 days a week.

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 2-3 months

Once or twice a year

Never

Have you played a gaming machine (sometimes known as a fruit or slot machine) in person in the past four weeks?

Please select only one item:

Yes

No

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

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

**Introduction**

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) (opens in new tab) sets out that, “The Gambling Commission will conduct a review of its gaming machine technical standards. The review will include an assessment of the role of session limits across Category B and C machines and the role of safer gambling tools. This review will consider the effects of any legislative change following the Gambling Act Review and, where appropriate, will consolidate the progress made so far by the industry on a voluntary basis.”

This commitment was consistent with our own recommendation as documented within our [Advice to Government](https://www.gamblingcommission.gov.uk/about-us/guide/advice-to-government-review-of-the-gambling-act-2005) (opens in new tab).

This consultation sets out proposals to:

* consolidate the existing 12 Gaming Machine Technical Standards (GMTS) into a single standard, whilst amending the format to be more consistent with our [Remote gambling and software technical standards](https://www.gamblingcommission.gov.uk/standards/remote-gambling-and-software-technical-standards) (opens in new tab) for greater clarity
* update the GMTS and Gaming Machine Testing Strategy (testing strategy) to remove obsolete material (for example, in relation to initial transitional arrangements and implementation dates) and make amendments to the Category B2 gaming machine requirements to reflect the changes to maximum charges for use (reduced from £100 per game to £2 per game) in 2019
* introduce 5 new technical standards and 1 social responsibility code provision designed to support and empower consumers to use gaming machines safely at every stage of the customer journey
* introduce a licence condition, under the powers conferred by section 86(2) of the Gambling Act 2005, which will allow us to effectively address instances whereby a gaming machine has been illegally manufactured, supplied, installed, adapted, maintained or repaired, or does not comply with the GMTS
* amend 3 existing technical standards having considered industry proposals to improve consumer enjoyment and gameplay.

A further consultation may be required in due course if government decides to remove the prohibition on the direct use of debit cards on gaming machines. Our [Advice to Government](https://www.gamblingcommission.gov.uk/about-us/guide/advice-to-government-review-of-the-gambling-act-2005) (opens in new tab) outlined that any move towards allowing debit card payments (or payment services such as Apple Pay) directly on gaming machines would need to strike an appropriate balance between regulation applicable to modern payment methods, consumer benefits and protection of the licensing objectives. If government decides to proceed in a manner broadly consistent with the previous government’s consultation response [‘Government response to measures relating to the land-based gambling sector’](https://www.gov.uk/government/consultations/measures-relating-to-the-land-based-gambling-sector/outcome/government-response-to-measures-relating-to-the-land-based-gambling-sector#chapter-3-cashless-payments-on-gaming-machines) (opens in new tab), we are in position to move towards consultation on a number of customer protections that would more naturally sit within our Gaming Machine Technical Standards (GMTS).

Lastly, in the future, we recognise it may be appropriate to undertake a further consultation to consider the effects of any legislative change following the Gambling Act Review.

**Evaluating the impact of relevant proposals**

In our [Corporate Strategy 2024 to 2027](https://www.gamblingcommission.gov.uk/about-us/guide/corporate-strategy-2024-to-2027) (opens in new tab) we have committed to setting clear evidence-based requirements for licensees and evaluating new requirements and policies.

The outcomes we are seeking to deliver are also set out in our strategy. The proposals in this consultation are most relevant to the following regulatory outcomes:

* vulnerable people are protected from gambling-related harm by effective regulatory requirements and compliant licensees
* consumers are able to make informed choices about their gambling.

The Commission and Department for Culture, Media and Sport (DCMS) have jointly commissioned the National Centre for Social Research (NatCen) to deliver an evaluation of the Gambling Act Review. DCMS published an overview of the [evaluation plan in December 2024](https://www.gov.uk/guidance/gambling-act-review-evaluation-plan) (opens in a new tab) and the Commission published an accompanying [blog post](https://www.gamblingcommission.gov.uk/blog/post/gambling-act-review-evaluation-update) (opens in a new tab).

~~G~~iven the complexities and challenges involved in the whole Gambling Act Review, it will not be possible to measure every potential outcome. NatCen has developed a proportionate approach to identify the areas of greatest opportunity for learning, with a focus on policies that are expected to have the most significant contribution to intended outcomes. The Gambling Act Review evaluation will seek to establish, as far as possible, whether in-scope policy measures are being delivered effectively, understand if they are achieving their intended outcomes, impacts, any unintended consequences, and capture learning to inform the design and implementation of any future policy changes.

The evaluation and measurement approaches to be used to answer the Gambling Act Review impact and process evaluation questions will depend on the final policy positions, some of which are not yet known, including those to be determined as a result of consultation. The timing of evaluation activities and further decisions regarding the detailed scope and approach of the evaluation for any policies introduced following this consultation will be made once the consultation response document is published.

As emphasised in the December blog, evaluation plans will involve a range of participants, including operators, people who gamble, and other relevant stakeholders. The evaluation will include a Lived Experience Panel bringing together people with lived experience of gambling and gambling harm, working in conjunction with our pre-existing Lived Experience Advisory Panel, and an Evaluation Advisory Group is being set-up to provide evaluation expertise and objective, external advice on how best to take the evaluation forward.

We invite views on the evidence that would help to inform evaluation, as well as evidence presented throughout this consultation process.

**Impact assessment**

In developing these proposals, we seek to understand the impact and proportionality of the approach we propose to take to implement the white paper in terms of the effect on gambling businesses, clubs and pubs and other stakeholders.

We understand that our proposals will impact upon the casino, bingo, adult gaming centre (AGC), family entertainment centre and betting sectors. Whilst we recognise the scale of impact will vary from sector to sector and licensee to licensee, our engagement with industry indicates that smaller businesses within the bingo and AGC sectors may be most impacted by our proposals. Additionally, we realise that our proposals will impact on gaming machines made available for use in clubs (members' clubs, miners’ welfare institutes or commercial clubs) and, to a lesser degree, pubs.

The direct costs associated with our proposals will include, for example:

* lost gross gambling yield from, or replacement costs for, a significant number of gaming machines that will be unable to make the changes proposed and will therefore have to be removed. Industry have advised that, for instance, approximately 1600-1800 Category B3 gaming machines in AGCs and 600 in independent bingo clubs are at risk, along with an estimated 2,000 Category B4 (legacy) gaming machines. A further 5,000 Category B3A and B4 gaming machines in clubs could also be at risk. New Category B gaming machines can cost in excess of £10,000
* modifying gaming machines and/or games that are technically capable of making the proposed changes. Initial feedback suggests that there is approximately 1000 of these games and that updates would cost in the region of £4,000 per game
* software and staffing costs associated with managing staff alerts arising from the limit setting proposals.

We are committed to quantifying all impacts during the consultation process. This consultation includes questions inviting views on the direct costs associated with implementing the proposals, which may be incurred by affected businesses and other stakeholders. We will also explore these costs through further stakeholder engagement, including formal information requests to gambling businesses where deemed appropriate. Such information and data will be key to us assessing whether the regulatory benefits expected from our proposals are proportionate to costs of implementation.

**Equalities impacts**

The 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.​

The proposals are designed to modernise the Gaming Machine Technical Standards and Gaming Machine Testing Strategy. The proposals are also intended to support and empower consumers by, for example, providing appropriate breaks in play to evaluate their gambling behaviour and information that is designed to support them in gambling safely.

Our initial assessment is that the proposals do not present a negative impact on the protected characteristics stated within the Equality Act 2010, and they do not contribute towards unlawful discrimination, harassment or victimisation and/or other conduct prohibited by the Act. ​

We currently do not consider that the proposals reduce equality of opportunity or foster poor relations between people who share a protected characteristic and those who do not. ​

We will continue to keep this position under review and would welcome views in relation to this.

**Next steps**

Following consultation, we will analyse the responses alongside input from stakeholders and additional evidence gathered during the consultation period to formulate our response.

We are seeking views from respondents about any issues we should be aware of in implementing each of the changes and new requirements, should they progress to implementation.

**General information and Evidence**

**Background**

Section 96 of the Gambling Act 2005 (the Act) enables the Commission to set Gaming Machine Technical Standards (GMTS) for gaming machines, to make arrangements for the administration of tests of compliance with the GMTS and to provide for the enforcement of GMTS and submission to tests by attaching conditions to operating licences.

[Licence condition 2.3.1](https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/condition/2-3-1-technical-standards) (opens in new tab) of the licence conditions and codes of practice requires that all non-remote gaming machine technical licence holders must comply with our GMTS and with requirements set out by us relating to the timing and procedures for testing.

The [GMTS](https://www.gamblingcommission.gov.uk/licensees-and-businesses/page/gaming-machine-technical-standards) (opens in new tab) set out in detail our requirements with respect to game features, display notices and general machine operation including metering.

The [Gaming Machine Testing Strategy](https://assets.ctfassets.net/j16ev64qyf6l/6IRrwPl0PE1VoFfMOrccyx/e021d5260c2669dde40f04e94f61521a/Gaming-machine-testing-strategy.pdf) (testing strategy) (opens in new tab) (first published in June 2007) sets out the testing requirements for the GMTS. This includes who can test against the GMTS, what will need to be tested and the deadlines for testing. It discusses the testing strategy for assessing compliance with the GMTS for categories A, B1, B2, B3, B3A, B4, C, D, server networked and downloadable games, cashless payment machine systems, linked progressives and wireless networks. It also covers system integration testing and commercial site testing.

They were developed to help ensure the three licensing objectives are met. Those objectives are to:

• prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

• ensure that gambling is conducted in a fair and open way

• protect children and other vulnerable persons from being harmed or exploited by gambling.

We consulted on changes to the testing strategy in 2013 and 2014 to clarify certain requirements as a result of lessons learnt from compliance cases involving game manufacturers that incorrectly interpreted, misunderstood or simply failed to comply with the requirements of the testing strategy. Whilst attempting to strike a balance between the integrity of testing and licensee costs incurred, we made changes, for example, in relation to defining game variants and testing requirements for random and compensated games and requiring a personal management licence holder or responsible person to sign games off as compliant prior to release in all cases. More information is available in the [Gaming Machines Testing Strategy – consultation response](https://assets.ctfassets.net/j16ev64qyf6l/3PzpZ5onZ2vP0LntNzLas4/de479713e4a3e7a07615ec6e6a2bfa9d/Gaming-machines-testing-strategy-consultation-responses.pdf) (opens in new tab).

Furthermore, in 2020, as part of our ongoing commitment to raising standards in the gambling industry we consulted on strengthening the framework for test houses. We use test houses to support us in meeting our statutory duties and the licensing objectives. Test houses provide assurance to consumers, licensees and us that games are fair and suitable to make available to consumers. Test houses must adhere to a framework set by the Commission; this framework provides us with a level of confidence in the products being offered by licensees to consumers. Enhancements (applicable to test houses) were made in four areas; accreditation, approval, reporting requirements and suspension or revocation. More information is available in [our response to the Test House Framework development consultation](https://www.gamblingcommission.gov.uk/consultation-response/test-house-framework-development) (opens in new tab).

**Industry Statistics and cross-venue gaming machines data**

Having the right Gaming Machine Technical Standards (GMTS) and a robust testing strategy is crucial when we think about the significant size of the gaming machine industry in Great Britain.

Our [Industry Statistics](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-november-2024-official-statistics) (opens in new tab) detail the number of gaming machines made available, and gross gambling yield (GGY) generated from those machines, by licensed gambling operators. It is noted that gaming machines are also made available in premises such as unlicensed family entertainment centres, pubs and clubs. In order to site such machines, some form of authorisation is normally required from the local licensing authority. Such machines are not captured within our Industry Statistics.

The following section contains figures and narrative that were published in November 2024 and relate to the period April 2023 to March 2024 unless stated otherwise.

Gaming machines in licensed gambling premises generated £2.5 billion of GGY. This represents over a fifth of the total GGY reported for the gambling industry in Great Britain (excluding all reported lotteries) and over half of the total GGY reported for non-remote, land-based, gambling.

The GGY generated by gaming machines between April 2023 to March 2024 represented an increase of 4.5 percent (£108 million) from April 2022 to March 2023 and an increase of 24.5 percent (£494 million) on the last pre-lockdown period of April 2019 to March 2020.

Gaming machines in betting premises generated the largest proportion of GGY (£1.23 billion), followed in descending order by Adult Gaming Centres (£623 million), Bingo premises (£394 million), Casinos (£220 million) and Family Entertainment Centres (£41 million).

Category B3 machines, which have stakes and prizes limits of £2 and £500 per game respectively, generated £1.97 billion (78.4 percent) of the total GGY generated. Other Category B machines generated £235.6 million (9.4 percent), with lower stakes and prizes Category C and D machines being responsible for the remaining £306.2 million (12.2 percent). Our website provides [a summary of the gaming machine categories and entitlements](https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/gaming-machine-categories) (opens in new tab).

The average number of machines available for use across all licensed gambling premises was 202,342. The most machines available by sector were Bingo premises with 89,660 (44.3 percent) and Adult Gaming Centres with 74,523 (36.8 percent).

In terms of mix between machine categories, 54,052 (26.7 percent) were Category B machines. The majority of machines were Category C with 107,990 (53.4 percent), with Category D machines totalling 40,299 (19.9 percent).

In addition to our Industry Statistics, we have previously published our [cross-venue gaming machines data](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/cross-venue-category-b-gaming-machines-data) from 2019 (opens in new tab). Whilst noting the data is not reflective of the entire machines sector, we consider it can be used as an indicator for potential risks to consumers within the current stake and prize limits.

For example, the cross-venue gaming machine data for April 2019 to September 2019 shows session outcomes by time. It highlights that, within betting, AGC, bingo and casino premises, 3.1 percent of Category B gaming machine sessions lasted for over 60 minutes. The respective figure for Category C gaming machine sessions was 2.3 percent.

By sector, the respective figures for gaming machine sessions lasting over 60 minutes were:

* + betting – Category B 2.9 percent and Category C 1.0 percent
  + AGC – Category B 1.6 percent and Category C 3.9 percent
  + bingo – Category B 1.1 percent and Category C 1.5 percent
  + casino - Category B 11.0 percent (no Category C data available).

The same dataset also shows session outcomes by net expenditure (in effect, stakes minus returns). It shows that within betting, AGC, bingo and casino premises, 1.8 percent of Category B gaming machine sessions resulted in a customer loss of over £200. The respective figure for Category C gaming machine sessions was 0.5 percent.

By sector, the respective figures for gaming machine sessions resulting in a customer loss of over £200 were:

* + betting – Category B 1.7 percent and Category C 0.04 percent
  + AGC – Category B 2.3 percent and Category C 1.0 percent
  + bingo – Category B 1.6 percent and Category C 0.3 percent
  + casino – Category B 3.8 percent (no Category C data available).

**Gambling participation rates and the prevalence of problem gambling**

Our [statistics on participation](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-1-2023-official) (opens in new tab) (covering GSGB Year 1 (2023)) show that 3 percent of Great British adults (aged 18 years and over) gambled in the past 4 weeks on fruit or slot machines in person.

Whilst millions of people enjoy gambling safely in Great Britain, we know there are also hundreds of thousands of people who face difficulties when it comes to gambling.

In July 2024, we published the data from the Gambling Survey for Great Britain which contains information on the consequences of gambling, including the Problem Gambling Severity Index (PGSI) scores for specific gambling activities. The PGSI consists of nine questions which measure both behavioural symptoms of gambling disorder and certain adverse consequences from gambling. A PGSI score of 8 or more represents problem gambling by which a person will have experienced adverse consequences from gambling and may have lost control of their behaviour. Involvement in gambling can be at any level, but it is likely to be heavy.

The PGSI scores are shown as relative differences which can be higher or lower than the average for all people who had gambled in the past 12 months. Our data shows that those who had bet on fruit and slot machines in person, were 3.7 times more likely to have scored 8 or more on the PGSI than the average for all those who have gambled in the past 12 months.

It is noted that associations between PGSI and each activity does not indicate causation. There are likely to be other factors, such as the number of activities played, that may underlie these associations. All surveys have strengths and limitations and we have outlined the strengths and limitations of our approach in the [data analysis and reporting section of the technical report](https://www.gamblingcommission.gov.uk/report/gambling-survey-for-great-britain-technical-report/gsgb-2024-technical-report-data-analysis-and-reporting)(opens in new tab).

**Details of the proposals**

**Consultations contents page**

Please select a consultation section from the following. If you have answered all of the ones you wish, please select the ‘finished’ option.

Please select only one item at a time:

Consolidation and update of the Gaming Machine Technical Standards

Update of the Gaming Machine Testing Strategy

Gambling Commission proposals designed to support and empower consumers to use gaming machines safely

Industry proposals to improve consumer enjoyment and gameplay.

**Consolidation and update of the Gaming Machine Technical Standards (GMTS)**

The GMTS were first published in 2007 and have had only limited updates since then. They are currently spread across 12 individual GMTS – covering machine categories A, B1, B2, B3, B3A, B4, C, and D, and server networked and downloadable games, cashless payment machine systems, linked progressives and wireless networks.

The GMTS contain some duplication and are outdated in style and format when compared to the Remote Technical Standards (RTS). They also need updating to reflect legislative change and remove obsolete material.

We propose to consolidate the 12 individual GMTS into a single GMTS and align the style and format to resemble the RTS more closely. This proposal will not lead to substantive changes in the GMTS, which are typically prescriptive in nature.

We did consider whether a consolidation exercise was necessary at all or whether our proposal to consolidate goes far enough. By way of example, we considered whether more substantive changes were appropriate to make the GMTS principles based, without detailed technical requirements. We concluded that making the GMTS solely principles-based would not address the risks posed, and a more prescriptive approach has worked well in upholding the licensing objectives (as envisaged by the Gambling Act 2005 in which the power to set detailed technical standards is set out).

Download a draft version of the [proposed single GMTS](https://consult.gamblingcommission.gov.uk/author/52f76bd5/user_uploads/proposed-gaming-machine-technical-standards.pdf) (opens in new tab) (PDF). If you require a copy of the file in an accessible format [contact us](https://www.gamblingcommission.gov.uk/forms/formatrequest) (opens in new tab) with details of what you require. It would help us to know what technology you use and the required format. Some PDF files cannot be displayed in a browser, you will see a message saying "Please wait...". If you see this message, you will need to download the file and open it in [Adobe Acrobat Reader](https://get.adobe.com/reader/) (opens in new tab).

The following section, whilst not intended to be an exhaustive list, provides a summary of the proposed changes.

*Consolidation*

The proposed consolidated document is structured into eight main standards, which are unchanged from the existing GMTS and apply, in some form or another, to all the main categories of gaming machines.

A further 6 standards are included for specific technical requirements. Although text has been re-structured in some areas, these are essentially unchanged from the existing GMTS and cover areas such as legacy gaming machines, wireless network requirements and linked progressive requirements.

A summary, in table form, of which GMTS applies to which machine Category is included on pages 83 and 84 of the proposed single GMTS.

*Layout*

A new section, titled ‘Layout of the GMTS’, has been included to explain that the style and format of each standard has been updated to reflect the **aim**, the **requirement** and **implementation guidance** (where applicable). This format is consistent with that used within our RTS .

The **aim** describes what the Commission is seeking to achieve.

The **requirement** sets out specific requirements to meet the aim.

The **implementation guidance** explains, where appropriate, how the requirement should be complied with, without exhaustively describing all possible solutions. Licensees may adopt alternative approaches to those set out in the **implementation 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.

Generally speaking, the language of the existing GMTS has been moved into either the **requirement** or the **implementation guidance**. By moving parts of the existing GMTS into implementation guidance, licence holders will be permitted to use equivalent methods, if any are available, without breaching the specific GMTS. In a small number of instances, such as, for example, GMTS 8.3a and 8.3b, implementation guidance has been added to increase clarity on what we expect.

The applicability of the requirements within each standard are clearly defined by machine and/or game Category.

*B2 gaming machines*

The existing GMTS for Category B2 gaming machines are, in some areas, more restrictive than the respective GMTS for Category B3 gaming machines. This is because the existing GMTS recognised Category B2 gaming machines as being a higher risk product given it allowed a maximum charge for use of £100 per game at the time of writing. [The Gaming Machine (Miscellaneous Amendments and Revocation) Regulations 2018 (opens in new tab)](https://www.legislation.gov.uk/uksi/2018/1402/made) reduced the maximum charge for use on a Category B2 gaming machine from £100 to £2. This is the same maximum charge for use as a Category B3 gaming machine. Given the now identical maximum charges for use (and maximum payouts) on Category B2 and B3 gaming machines, we propose amending the GMTS for Category B2 gaming machines in relation to game speed of play (GMTS 5.7 – each game cycle must last at least 2.5 secs) and use of compensators and/or regulators (GMTS 5.8 – such use is now permissible subject to compliance with the requirements and implementation guidance).

*Wording and accessibility*

Some words or wording has been amended to better reflect current practice and provide additional clarity. Examples include changing ‘Displays’ to ‘Display of Information’ (GMTS 10.2), ‘bill acceptor door’ to ‘note acceptor door’ (GMTS 7.5) and ‘machine’ to ‘random game’ or ‘game’ (GMTS 5.1a). Any such changes are not substantive in terms of the requirements.

Minor changes have also been made for accessibility purposes. Examples include changing ‘e.g.’ to ‘for example’, using ‘percent’ instead of the percent symbol (%) and using plain English substitutes for words.

Consultation questions

To what extent do you agree with the proposal to consolidate the 12 existing GMTS into a single GMTS as described?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

Do you have any comments about implementation issues, timelines and practicalities relating to the proposal to consolidate the existing 12 GMTS into a single GMTS as described?

[free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposal to consolidate the existing 12 GMTS into a single GMTS as described.

[free text box]

To what extent do you agree with the proposal to amend the Category B2 GMTS in relation to game speed of play and use of compensators and/or regulators to make them consistent with the Category B3 GMTS now that the maximum charges for use are the same?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

Do you have any comments about implementation issues, timelines and practicalities relating to the proposed amendments for B2 GMTS in relation to game speed of play and use of compensators and/or regulators?

[free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposed amendments for B2 GMTS in relation to game speed of play and use of compensators and/or regulators.

[free text box]

**Update of the Gaming Machine Testing Strategy (testing strategy)**

We intend to take this opportunity to update the testing strategy to remove obsolete material (for example, in relation to the initial transitional arrangements and implementation dates when the Gambling Act 2005 first came into effect) and make amendments to the testing requirements for Category B2 gaming machines to reflect the changes made to maximum charges for use (reduced from £100 per game to £2 per game) in 2019.

Download a draft version of the [proposed testing strategy](https://consult.gamblingcommission.gov.uk/author/52f76bd5/user_uploads/proposed-gaming-machine-testing-strategy.pdf) (opens in new tab) (PDF). If you require a copy of the file in an accessible format [contact us](https://www.gamblingcommission.gov.uk/forms/formatrequest) (opens in new tab) with details of what you require. It would help us to know what technology you use and the required format. Some PDF files cannot be displayed in a browser, you will see a message saying "Please wait...". If you see this message, you will need to download the file and open it in [Adobe Acrobat Reader](https://get.adobe.com/reader/) (opens in new tab).

The following section, whilst not intended to be an exhaustive list, provides a summary of the proposed changes.

*Obsolete material*

References to the initial transitional arrangements and implementation dates have been removed as they are now obsolete.

*B2 gaming machines*

The existing testing requirements for Category B2 gaming machines are, in some areas, more stringent than the respective Gaming Machine Technical Standards (GMTS) for Category B3 gaming machines. This is because the existing testing requirements recognised Category B2 gaming machines as being a higher risk product given it allowed a maximum charge for use of £100 per game. [The Gaming Machine (Miscellaneous Amendments and Revocation) Regulations 2018](https://www.legislation.gov.uk/uksi/2018/1402/made) (opens in new tab) reduced the maximum charge for use on a Category B2 gaming machine from £100 to £2. This is the same maximum charge for use as a Category B3 gaming machine. Given the identical maximum charges for use (and maximum payouts) on Category B2 and B3 gaming machines, we propose to align the testing requirements for Category B2 gaming machines with those applicable to Category B3 gaming machines.

*Legacy machines*

Information covering the testing of legacy machines has been pulled into a single section.

*Wording and accessibility*

Sections 5 and 6 of the existing testing strategy have been amalgamated into a single section as Category B4, C and D gaming machines are treated the same for testing purposes.

We have clarified, in Section 9, that a summary of each game title approved in-house (by a licensee) should only be submitted to the Commission on our request.

We have re-drafted Section 13 of the existing testing strategy to make its meaning clearer with regards to the re-testing requirements when modifications are made to an existing gaming machines hardware or software.

Some minor changes, as described previously, have been made for accessibility purposes.

Consultation questions

To what extent do you agree with the proposed changes to the testing strategy with regards to obsolete material, legacy machines and wording and accessibility?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

Do you have any comments about implementation issues, timelines and practicalities with regards to the proposed changes to the testing strategy with regards to obsolete material, legacy machines and wording and accessibility?

[free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposed changes to the testing strategy with regards to obsolete material, legacy machines and wording and accessibility.

[free text box]

To what extent do you agree with the proposal to amend the Category B2 gaming machine testing requirements to those applicable to Category B3 gaming machines now that the maximum charges for use are the same?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

Do you have any comments about implementation issues, timelines and practicalities with the proposal to amend the Category B2 gaming machine testing requirements?

[free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposal to amend the Category B2 gaming machine testing requirements.

[free text box]

**Gambling Commission proposals designed to support and empower consumers to use gaming machines safely**

**Introduction**

In our [Advice to Government](https://www.gamblingcommission.gov.uk/about-us/guide/advice-to-government-review-of-the-gambling-act-2005) (opens in new tab) we committed to a review of our Gaming Machine Technical Standards (GMTS) that would include an assessment of the role of session limits across Category B and C gaming machines and consideration of the role of other safer gambling measures. This has included, for example, a review of the potential applicability of the online slots protections contained within our Remote Technical Standards and having regard to the voluntary measures outlined within the industry’s ['Land-based game design code of conduct'](https://bettingandgamingcouncil.com/uploads/BGC_Code-of-Conduct_Land-Based-Game-Design.pdf) (opens in new tab).

We have used a thorough evidence assurance process in finalising our proposals. This included, for example, reviewing data sources, consumer benefits, impacts on licensees and available research.

It is noted that when finalising our individual proposals, we considered how they will interact with the other proposals being taken forward. We have also considered how the proposals will align to and interact with our existing licence conditions and codes of practice in areas such as ‘know your customers’, premises supervision and customer interaction. Our intention was to arrive at a package of proposals that protect the vulnerable, ensures consumers can make informed decisions about their gambling and recognises the need to minimise the impact on consumers who are not experiencing difficulty in managing their gambling safely. We recognise that if we do not strike the right balance consumers may simply be pushed onto neighbouring machines or into nearby venues, making it difficult to monitor consumer activity across sessions and interact when appropriate.

We have arrived at what we consider to be an appropriate set of proposals, which relate to:

* limit setting functionality
* safer gambling messaging
* display of net position and session time
* awards below the stake size
* prohibiting player-led features that permit a customer to reduce the time until the result is presented
* social responsibility code provision 3.3.3 (placing specific requirements on licensees making Category B gaming machines available for use)
* introduction of a licence condition, under the powers conferred by section 86(2) of the Gambling Act 2005, which will allow us to effectively address instances whereby a gaming machine has been illegally manufactured, supplied, installed, adapted, maintained or repaired, or does not comply with the GMTS.

Having decided what proposals to consult on, we also used the evidence assurance process to determine the application of each of our proposals. This included consideration of:

* the categories of gaming machine that should be in scope
* the approach to take to new and/or existing gaming machines
* potential exemptions for certain types of gaming machines
* the timelines for bringing new GMTS into force
* the approach to take on gaming machines that offer access to more than one game

The following sections of the consultation document explore the aforementioned areas in a little more depth.

**The categories of gaming machine within scope**

The regulatory framework for gaming machines is based on there being different [categories of gaming machines](https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/gaming-machine-categories) (opens in new tab) which are appropriate for use in [different locations](https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/gla-appendix-a-summary-of-machine-provisions-by-premises) (opens in new tab) and by different ages of user. The appropriateness depends on the use and nature of the premises (gambling or non-gambling premises), the degree of regulation to which the premises are subject and the identity and age of potential visitors to the premises. The risks associated with the different categories of gaming machine decrease as you move down the categories from A through to D.

The [maximum stakes and prizes permitted are also different for each gaming machine category](https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/appendix-b-summary-of-gaming-machine-categories-and-entitlements) (opens in new tab) with allowances being highest for Category A and B gaming machines (stakes and prizes decrease through the sub-categories). Category C gaming machines come next, followed by Category D gaming machines that are low-stake fruit machine style machines, coin pushers (sometimes called penny falls) or crane grabs. It is noted that whilst Category A gaming machines exist within the framework none are currently permitted as plans for a ‘Regional casino’ have not been taken forward by respective governments.

In determining the scope of our proposals, we concluded it was appropriate and proportionate to focus on where the risk is highest and the positive impact on consumers will be greatest.

The ‘Industry Statistics and cross-venue gaming machines data’ section of this consultation that highlights, for example, that:

* Category B gaming machines accounted for 87.8 percent of gaming machine gross gambling yield in licensed gambling premises in April 2023 to March 2024
* the cross-venue gaming machine data for April 2019 to September 2019 shows that within betting, AGC, bingo and casino premises, 1.8 percent of Category B gaming machine sessions resulted in a customer loss of over £200 whilst 3.1 percent of sessions lasted for over 60 minutes. The respective figures for Category C gaming machines were lower at 0.5 percent and 2.3 percent.

Additionally, our Industry Statistics for April 2023 to March 2024 show that the average gross gambling yield per Category B gaming machine is significantly higher (across all sub-categories) than the respective figures for Category C and D gaming machines:

* Category B1 = £70,000 per gaming machine
* Category B3 = £39,400 per gaming machine
* Category B4 = £17,800 per gaming machine
* Category C = £2,200 per gaming machine
* Category D = £1,700 per gaming machine.

For the purposes of consultation, we concluded that Category A, B1, B2 and B3 gaming machines should be in scope for all our proposals. Given Category A gaming machines exist within framework (noting none are currently permitted), we consider it is sensible to include them in our proposals on a precautionary basis. Thereafter, we considered potential exemptions for Category B3A and B4 gaming machines, recognising that Category B3A gaming machines can only be made available for use in members’ clubs or miners’ welfare institutes and that Category B4 gaming machines can be made available for use in members’ clubs, miners’ welfare institutes, commercial clubs and most licensed gambling premises. [Members’ clubs, miners’ welfare institutes and commercial clubs](https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/members-clubs-and-commercial-clubs) (opens in new tab) are set-up and mainly run for non-gambling purposes. Members’ clubs and miners’ welfare institutes are not created as a commercial enterprise and are run for the benefit of their members. We will outline our approach (and supporting rationale) to those categories of gaming machine within the relevant section for each proposal.

Additionally, we have included Category C gaming machines in scope for the proposals concerning ‘awards below the stake size’ and ‘prohibiting player-led features that permit a customer to reduce the time until the result is presented’, where we conclude the principal driver for the proposal is a risk to the fair and open licensing objective.

**The approach to new and/or existing gaming machines**

For the purposes of this consultation, having determined which categories of gaming machines should be within scope of our proposals, we then considered whether existing gaming machines that are already in the market should be treated differently to new gaming machines (those manufactured after any new technical standards come into force).

We recognise that harmful play does not necessarily distinguish between new and existing gaming machines and having concluded it is appropriate to consult on our proposals, our starting point was that the proposals should apply to new and existing gaming machines for those categories designated to be in scope. To make existing gaming machines exempt may drive harmful play to those machines which would not be required to offer the proposed protection. This could, for example:

* create an inconsistent approach to the customer journey
* lead to commercial disadvantage
* limit the availability of data that would help licensees and the Commission better protect consumers.

Thereafter, we considered the consumer benefits of each proposal against the technical challenges and direct costs associated with implementation for existing games. Having undertaken that process, we have concluded it is or may be appropriate to exempt existing gaming machines from certain proposals – either in totality or in limited circumstances related to machine category and/or premises type. We will outline our approach (and supporting rationale) to existing gaming machines within the relevant section for each proposal.

**Exemptions for certain types of gaming machines**

In addition to the different [categories](https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/gaming-machine-categories) (opens in new tab), existing gaming machines are of different ages, have varying degrees of technical capability and come in many shapes and sizes. The marketplace includes recently manufactured digital terminals or tablets that contain multiple games whereby updates can be sent remotely, through to legacy gaming machines which were manufactured and available for use on premises before the Gambling Act 2005 came into force on 1 September 2007. Legacy machines do not have to comply with the full Gaming Machine Technical Standards (GMTS) that apply to a newly manufactured machine of the appropriate category. Legacy machines and older machines manufactured from September 2007 also have technical limitations (related to software and/or hardware) that would make compliance with the proposals impossible. As such, we recognise that proceeding without exemptions for such gaming machines will require them to be removed from the market at a cost to licensees (and to clubs offering gaming machines via a club gaming or machine permit) and may impact on consumer choice and enjoyment. Subject to the consultation outcomes, it is noted that changes may be required to the Commission’s definition of a legacy machine and the relevant legacy sections within the GMTS and Testing Strategy. The changes will be limited to the removal of references to legacy machines of categories B3 and B4.

As part of our ongoing engagement with industry we have begun to explore this issue further, seeking to better understand the volume and location of such gaming machines in the market and the potential cost implications of updating or replacing existing machines. We understand that our proposals will impact upon the casino, bingo, adult gaming centre (AGC), family entertainment centre and betting sectors. Whilst we recognise the scale of impact will vary from sector to sector and licensee to licensee, our engagement with industry indicates that smaller businesses within the bingo and AGC sectors may be most impacted by our proposals. Additionally, we realise that our proposals will impact on gaming machines made available for use in clubs (members' clubs, miners’ welfare institutes or commercial clubs) and, to a lesser degree, pubs.

In terms of the direct costs associated with our proposals, we note these will include, for example:

* lost gross gambling yield from, or replacement costs for, a significant number of gaming machines that will be unable to make the changes proposed and therefore have to be removed. Industry have advised that, for instance, approximately 1600-1800 Category B3 gaming machines in AGCs and 600 in independent bingo clubs are at risk, along with an estimated 2,000 Category B4 (legacy) gaming machines. A further 5,000 Category B3A and B4 gaming machines in clubs could also be at risk. New Category B gaming machines can cost in excess of £10,000.
* modifying gaming machines and/or games that are technically capable of making the proposed changes. Initial feedback suggests that there is approximately 1000 of these games and that updates would cost in the region of £4,000 per game.

Whilst we are committed to quantifying all impacts during the consultation process, our position for consultation is that we will not exempt any types of existing gaming machine based upon factors such as age, shape, size or technical capability. To exempt certain types of existing gaming machine may drive harmful play to those gaming machines which would not be required to offer the proposed protections. This would create an inconsistent approach to the customer journey, potentially lead to commercial disadvantage (within and across sectors) and limit the availability of data that would help licensees and the Commission better protect consumers.

Additionally, it is noted that no exemption is proposed for what are known as ‘community’ gaming machines. ‘Community’ gaming machines have features that allow consumers to participate together alongside one another on separate gaming machines. For example, the receipt of a ‘community’ bonus on one gaming machine may result in the receipt of a ‘community’ bonus on the other gaming machines that are being played within the ‘community’. Inclusion within a ‘community’ rests on participating at a certain speed/frequency as determined by the game coding. We consider it is within the gift of manufacturers to update their game coding to permit compliance with our proposals and inclusion within a ‘community’.

**The timelines for bringing new Gaming Machine Technical Standards (GMTS) into force**

Section 76 of the Gambling Act 2005 requires the Commission to provide notice to licensees at least 3 months before introducing new requirements. In addition, we consider that these proposals fall within scope of the [World Trade Organisation Agreements in relation to ‘Technical Barriers to Trade’](https://www.wto.org/english/res_e/publications_e/tbttotrade_e.pdf#page=1) (opens in new tab). This is because our proposals are likely to be considered a ‘technical regulation’ as defined in Annex 1 of the Technical Barriers to Trade (TBT) and therefore fall within the scope of Article 3 of the TBT. The TBT seeks to ensure that regulation standards including testing and certification procedures followed by World Trade Organization Members, including the United Kingdom, do not create unnecessary obstacles to trade. They require that there is a ‘reasonable period’ between confirming a new requirement and their entry into force – and that the period should be no less than 6 months.

Further to the considerations outlined in the previous paragraph, we also recognise that making the technical changes proposed to existing games will take time and resource and this will vary dependent upon the individual circumstances of each business – be they High Street businesses or those within the supply and manufacturer chain. This point is particularly true with regards to updates that may ultimately be required for existing gaming machines whereby individual circumstances will include, for example, access to relevant expertise and resource, the technical capabilities or limitations of the gaming machines currently made available for use and the ownership and/or contractual status of those gaming machines (both in terms of hardware and software). We also recognise that the ability to recruit additional resource is limited by the technical and niche expertise required to carry out such work.

We are therefore proposing, for all proposals in this section, a different implementation date dependent upon whether they apply to a new or an existing gaming machine and/or game.

For new gaming machines and/or games, we are proposing that the implementation date will be approximately (but not less than) 6 months after confirmation of our policy positions within the published responses document.

For existing gaming machines and/or games, we are proposing that the implementation date will be approximately (but not less than) 24 months after confirmation of our policy positions within the published responses document.

It is noted that the implementation dates referenced would be the final deadline for compliance and that licensees would be able to update gaming machines to meet any new technical standards in advance of the implementation dates. We also recognise this approach to implementation dates will likely result in different levels of protection being available on different gaming machines of the same category within a single premises for a period of time.

We consider that the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) will determine whether a gaming machine and/or game is to be classed as a new or an existing gaming machine and/or game. For illustrative purposes only, if the requirements for new gaming machines were to come into force on 1 July 2026, a gaming machine and/or game with an external test house report or internal testing documentation (as signed off by a Personal Management Licensee) dated before 1 July 2026 would be classified as an existing gaming machine and/or game whereas a gaming machine and /or game with an external test house report or internal testing documentation (as signed off by a Personal Management Licensee) dated 1 July 2026 or thereafter would be classified as a new gaming machine and/or game.

Within this consultation we ask questions about our proposed timelines within the relevant section for each proposal. Specifically, if you do not agree with our proposals, we would welcome alternative ideas (and supporting rationale) for implementation dates.

**Gaming machines that offer access to more than one game**

Many gaming machines provide access to more than one game (in some cases over 100 games), which are often of different categories. This creates an additional layer of complexity for our proposals. Following consideration, we propose that different approaches may be appropriate subject to whether or not a proposal rests on the definition of a ‘session’.

The proposals in relation to ‘limit setting functionality’ and the ‘display of net position and session time’ rest on the definition of a session. For these proposals, where a licensee wishes to offer new and existing games alongside one another on a single gaming machine, we propose that all games on that gaming machine will be required to comply with the proposals for a new gaming machine.

Likewise, where a gaming machine contains games of more than one category, all games on the gaming machine will be required to comply with the GMTS proposals for ‘limit setting functionality’ and the ‘display of net position and session time’ based on the highest category of game available on it. For example, where a gaming machine offers both Category B3 and Category C games, all available games will have to comply with the proposed GMTS for ‘limit setting functionality’ and the ‘display of net position and session time’ for Category B3 gaming machines.

Such an approach will enable a consistent customer journey and level of protection whilst playing a single gaming machine. The alternative approach of allowing new and existing games and/or games of different categories to sit alongside one another on a single gaming machine with different GMTS applicable raises significant questions in a number of areas. For example, within a session that sees a consumer move from a new to an existing game (or vice versa) or from a Category B game to a Category C game (or vice versa) what would happen in relation to:

* the availability of net position and session time information
* the availability and application of upper limits in relation to customer set limits
* the length of breaks-in-play when default limits are reached
* the provision of staff alerts when a customer set or default limit is reached

We appreciate this approach will create challenges for licensees with regards to the games they make available for use on a single gaming machine but we consider the approach does offer some flexibility to licensees. For example, gaming machines could solely offer existing games. Others could focus on the offer of new games, with existing games added as they are updated to meet the requirements for new games. Whilst we recognise that approximately 1000 digital games are available across all manufacturers, each manufacturer would be able to determine which existing games it updates first based upon their own availability of resource and prioritisation criteria. We also recognise the proposed approach could impact negatively on both the number of games a consumer could choose from, and the availability of lower-risk Category C and/or D games, on a single gaming machine.

For the proposals in relation to ‘awards below the stake size’ and ‘prohibiting features that permit a customer to reduce the time until the result is known’, we consider an alternative approach can be taken. As such proposals do not rest on the definition of a session, there are no customer journey complexities if a consumer moves from a new to an existing game (or vice versa) or from a Category B game to a Category C game (or vice versa). We therefore propose that for ‘awards below the stake size’ and ‘prohibiting features that permit a customer to reduce the time until the result is known’, where a gaming machine offers multiple games, each game will be able to comply with the applicable GMTS for those proposals as defined by its own machine category rather than the GMTS for new games and/or the highest category of game available.

Within this consultation we ask questions about this area within the relevant section for each proposal. Specifically, if you do not agree with the proposals, we would welcome alternative ideas on how such scenarios should be regulated.

**Defining a ‘session’ for the purposes of the proposals in relation to limit setting functionality and the display of net position and session time**

The proposals in relation to limit setting functionality and the display of net position and session time rest on a gaming machine ‘session’. We propose to define a session in a manner that is based upon the definition used historically by manufacturers for collection of sessional data. We believe that the application of a ‘session’ definition will provide a consistent approach that will benefit all stakeholders and support future evaluation of sessional data.

We are keen to hear stakeholders’ views on the definition proposed as we want to ensure that the definition would not cause a session to end prematurely and thus impinge negatively on the information made available to consumers and staff.

The following text details our proposed, new Gaming Machine Technical Standard.

For the purposes of Gaming Machine Technical Standards 15.1 and 15.3, a ‘session’ is defined as the following:

* If a session is not already in progress, a session begins when credit is inserted by any method, or when a game is played
* if the machine credit is below 20p for 60 seconds from the end of the last game cycle then the session ends
* irrespective of the machine credit, if there is no customer input for 240 seconds, then the session ends
* if a customer presses ‘Collect’ at any time during a session, and all possible uncommitted credit is cashed out, the session ends
* any interruption to normal machine operation, for example a power cut, power off, malfunction or door open, will end the current session
* where a gaming machine provides access to more than one game, sessional data should be collected at the machine level. This means that sessional data could cover participation across multiple games subject to the conditions previously listed.

Consultation questions

To what extent do you agree with the ‘session’ definition?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the definition, please explain which element(s) pose an issue and provide an alternative where appropriate.

[Free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposal to define a ‘session’.

[free text box]

**Testing requirements and scope of proposals**

The [Gaming machine testing strategy](https://assets.ctfassets.net/j16ev64qyf6l/4lfngIqTSdsaHZ7ojbzsWD/6b2715cec08df734398fef8f101b9363/Gaming-machine-testing-strategy.pdf) (the testing strategy) (opens in new tab) sets out the testing requirements for the different categories of gaming machine and certain types of technology and/or functionality (such as, for example, server networked and downloadable games and wireless networks).

We do not consider that any of the proposals will require modifications to an existing gaming machine’s hardware or software such that it could potentially affect the fairness of the game (for example, maths tables or game personality) or randomness (where applicable). In a manner consistent with section 13 (Change controls) of the testing strategy, we therefore conclude that modifications must be documented and signed off as being compliant with the Commission’s requirements by a Personal Management Licence holder or a company director in the case of a small-scale operator.

Where additional modifications are made to an existing category B1, B2, B3 or B3A gaming machine’s hardware or software that could potentially affect the fairness of the game (for example, maths tables or game personality) or randomness (where applicable), then it must be resubmitted for testing by a Gambling Commission approved third party test house.

**Limit setting functionality**

We consider that pre-commitment tools can help consumers to manage their gambling safely, and that greater use of these tools would help reduce gambling-related harm. For example, the Commission’s 2023 research [Exploring consumer journeys using customer-led tools](https://www.gamblingcommission.gov.uk/about-us/guide/exploring-consumer-journeys-using-customer-led-tools) (opens in new tab) found that in terms of gambling management tools:

* of those who have ever used a gambling management tool, over half reported that they did so to help keep track of their wins and losses, and 49 percent reported that they did so to help budget their spending
* over 2 in 5 consumers who have used pre-commitment tools in the previous 12 months reported that they found them to be effective in reducing the time and/or money they spent gambling.

Whilst the research was focussed on the remote sector, where gambling management tools are widely available, we also consider that there are potential benefits from allowing consumers to set limits within a single session on a gaming machine. Indeed, in 2015 we introduced a social responsibility code provision in this area for Category B2 gaming machines which at that time permitted a maximum stake of £100 per game. Thereafter, we have encouraged the development of industry voluntary codes for other categories of gaming machine (such as B1 and B3). The reach of the existing limit setting functionality and specification does vary from sector to sector. For example, specification differences exist with regards to the length of time and monetary value at which default limits are set and the availability of staff alerts.

We recognise that industry feedback indicates that only a very small percentage of customers currently set their own limits and instead choose to rely on the gaming machines default limits. As part of the consultation exercise we are committed to collecting data from industry that will evidence how customers interact with the voluntary limit setting functionality and what happens thereafter when limits are reached. We would also welcome the provision of any evaluation that industry has undertaken on its voluntary codes, which could include, for example, when the betting sector moved from having a fixed default monetary limit to utilising Anonymous Player Awareness System. The data and information gathered will inform our final decision-making.

We maintain the view that the evidence base, on the whole, supports the view that pre-commitment tools can help consumers to gamble safely and that more widespread use of these tools would help reduce gambling-related harm. In particular, we think the tools may be most effective when customers set their own limits and that is something we consider our proposals will encourage.

As a starting point, our proposal will require consumers to make an active choice about whether to set their own time and monetary limits or rely on default time and monetary limits. When making an active choice, we propose consumers must be presented, at the same time, with the options of using a ‘free text’ box to set their own limits or selecting the default time and monetary limits. We consider this approach strikes an appropriate balance between consumer choice and protection. The benefits of presenting a ‘free text’ box to set limits is supported by research conducted into online gambling:

* the Commission’s 2023 research [Exploring consumer journeys using customer-led tools](https://www.gamblingcommission.gov.uk/about-us/guide/exploring-consumer-journeys-using-customer-led-tools) (opens in new tab) that found that just over half of respondents preferred to set their own limits without suggestions from a gambling company
* in 2021, the Behavioural Insights Team (BIT) published ['Applying behavioural insights to design better safer gambling tools'](https://www.bi.team/wp-content/uploads/2021/01/Remote-Interventions-gambling-anchoring-report-Final-Jan-15th-2021.pdf) (opens in new tab). This research, whilst having limitations in terms of sample, found that free text options led to lower limits being set, when compared to drop-down lists.

Presenting a ‘free text’ box would empower customers to consider and apply the right limits for them, based on their individual circumstances, without any suggestions or influence from licensees.

In considering the appropriate length of time and monetary value at which default limits are set, our starting point is that limits need to be meaningful and set at levels that help those experiencing difficulties with their gambling. We have also reviewed existing practice within the land-based sectors and our [cross-venue gaming machines data](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/cross-venue-category-b-gaming-machines-data) from 2019 (opens in new tab) – which we consider can be used as an indicator for potential risks to consumers.

As stated previously, the current default time and monetary limits vary from sector to sector. For Category B gaming machines, those limits are set at every 20 minutes of play and for every £150 of deposited sums in AGC and bingo premises. In casinos, such limits are typically set at every 60 minutes of play and for every £250 of loss. In betting premises, it is every 20 minutes of play and utilisation of the Betting and Gaming Council’s Anonymous Player Awareness System, which relies on the metrics of:

* absolute session loss (£ value of loss during session) — set at £500 or more
* extended losing session — any consumer that loses £250 or more in 30 minutes in a session
* chaotic play — any consumer that has more than 10 “cash insertions” of £5 or more in a session.

Our [cross-venue gaming machines data](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/cross-venue-category-b-gaming-machines-data) from 2019 (opens in new tab) shows session outcomes by time. It highlights that, within betting, AGC, bingo and casino premises, 17.4 percent of Category B gaming machine sessions lasted for over 20 minutes. The respective figure for Category C gaming machine sessions was 14.8 percent.

By sector, the respective figures for gaming machine sessions lasting over 20 minutes were:

* + betting – Category B 17.3 percent and Category C 9.1 percent
  + AGC – Category B 12.3 percent and Category C 18.5 percent
  + bingo – Category B 10.2 percent and Category C 13.2 percent
  + casino - Category B 32.2 percent (no Category C data available).

The same dataset also shows session outcomes by net expenditure (in effect, stakes minus returns). It shows that within betting, AGC, bingo and casino premises, 1.8 percent of Category B gaming machine sessions resulted in a customer loss of over £200. The respective figure for Category C gaming machine sessions was 0.5 percent. A further 3.5 percent of Category B gaming machine sessions and 1.7 percent of Category C gaming machine sessions resulted in a customer loss of between £100.01 and £200.

By sector, the respective figures for gaming machine sessions resulting in a customer loss of over £100 were:

* + betting – Category B 5.0 percent and Category C 0.5 percent
  + AGC – Category B 6.5 percent and Category C 3.7 percent
  + bingo – Category B 5.1 percent and Category C 1.5 percent
  + casino – Category B 9.2 percent (no Category C data available)

Having considered the evidence available to us, we propose a consistent approach is taken in this area. This will aid consumers understanding of the limit functionality available to them when playing a gaming machine regardless of the premises type. We propose that where a customer chooses to utilise default time and monetary limits, the default time limit must be no longer than (every) 20 minutes and the default monetary limit must be no more than (every) £150 of deposited sums. For the purpose of the proposals, ‘deposited sums’ are defined as payment made, in money or money’s worth, in respect of the use of the machine since the start of the session. It would not include winnings received during a session that are subsequently staked during the same session. We consider that ‘deposited sums’ is the most appropriate metric for customer set or default monetary limits but are open to suggestions for alternative metrics as deemed appropriate.

We consider such thresholds are proportionate in that they will target potentially higher risk sessions without impacting on the majority. Such limits are also consistent with those available on Category B gaming machines in AGC and bingo premises.

For clarity, we are not proposing that default limits would override instances whereby a customer has chosen to set their own time and monetary limits at levels above the proposed default limits. We are, however, keen to seek views on whether there should be upper limits on the length of time and monetary value that a customer could choose when setting their own limits and, if so, what those upper limits should be.

Mandating upper limits (and prohibiting no limits) on customer set limits has both benefits and disadvantages. A benefit would include preventing consumers from potentially setting excessively high (or no) limits to avoid breaks in play or triggering staff alerts. ['Breaks in play: Empowering gamblers through in-game harm minimization features for electronic gaming machines'](https://www.researchgate.net/publication/312612095_Zeitschrift_fur_Glucksspielwesen_journal_for_gambling_industry_regulation) by Gainsbury and Blaszczynski (2016) (opens in new tab) noted that breaks in play, even for short periods, are important to minimise the potential impact of dissociation and enable gamblers to be aware of the amount of time and money they have spent. Staff alerts can form a significant part of any venue’s approach to monitoring their consumers play – with their importance increasing as the risk of a harmful outcome is heightened within sessions of an extended length and where values of deposited sums are high.

We consider that setting upper limits at appropriate and proportionate levels could ensure those benefits are realised whilst potential disadvantages, such as the impact on customer choice and journey, are minimised. In proposing the inclusion of upper limits within customer set limits we are not suggesting that play below or above those limits is either safe or unsafe. Rather they are the maximum levels of participation that should be permitted before a break in play and staff alert is required. It is noted that we propose that customer set time and monetary limits cannot permit the customer to choose no limits (or equivalent).

As documented previously, we consider our [cross-venue gaming machines data](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/cross-venue-category-b-gaming-machines-data) from 2019 (opens in new tab) can be used as a useful indicator for potential risks to consumers. It highlights that 3.1 percent of sessions across Category B gaming machines in betting, AGC, bingo and casino premises lasted for over 60 minutes. We propose an upper limit of 60 minutes for a customer set time limit. An upper limit of this duration would only impact on a minority of gaming machine sessions across all sectors and would not impinge unduly on the proposed default time limit of 20 minutes which is 3 times lower than the proposed upper limit for a customer set time limit.

The same dataset also shows session outcomes by net expenditure (in effect, stakes minus returns). It shows that 1.5 percent of sessions across Category B gaming machines in betting, AGC, bingo and casino premises resulted in a customer loss of £200.01 to £500, with a further 0.2 percent of sessions resulting in losses over £500. We recognise that net expenditure and deposited sums are different metrics and that deposited sums will generally be greater than net expenditure. But using the previously mentioned figures as a useful indicator, we propose an upper limit of £450 of deposited sums for a customer set monetary limit. An upper limit of this amount would only impact on a minority of gaming machine sessions across all sectors and would not impinge unduly on the proposed default monetary limit of £150 of deposited sums which is 3 times lower.

We propose that reaching either a customer set or default limit must result in the provision of customer alerts. Customer alerts, resulting in breaks in play and safer gambling messaging, can support consumers to gamble safely. For example, ['Breaks in play: Empowering gamblers through in-game harm minimization features for electronic gaming machines'](https://www.researchgate.net/publication/312612095_Zeitschrift_fur_Glucksspielwesen_journal_for_gambling_industry_regulation) by Gainsbury and Blaszczynski (2016) (opens in new tab) notes that:

* + a break in play can give consumers an opportunity to evaluate their own gambling behaviours, and could therefore facilitate better control
  + a break or interruption in play could involve slowing the transactional process and providing delays before new funds are made available to the customer for use. Such controls could be combined with informative messaging, so as to support the customer’s control and awareness of their gambling spend.

With regards to the appropriate length of breaks in play, there is a limited body of research conducted in land-based settings. As stated previously, ['Breaks in play: Empowering gamblers through in-game harm minimization features for electronic gaming machines'](https://www.researchgate.net/publication/312612095_Zeitschrift_fur_Glucksspielwesen_journal_for_gambling_industry_regulation) by Gainsbury and Blaszczynski (2016) (opens in new tab) noted that breaks in play, even for short periods, are important to minimise the potential impact of dissociation and enable gamblers to be aware of the amount of time and money they have spent. It also notes that, in isolation, breaks in play can generate counterproductive increases in urges to gamble.

We consider it is appropriate to propose a minimum break in play length of at least 30 seconds. We consider this length of break in play should be viewed as a safer gambling measure for all consumers. This minimum break in play of at least 30 seconds would apply to all customer alerts – regardless of whether they were triggered by a customer set or default limit. This length of break in play is consistent with the approach taken for customer set limits within the industry voluntary codes. However, we do not consider that the current industry practice for default breaks in play, that range in length from (a minimum of) 3 seconds to 10 seconds, is sufficient to allow for a genuine period of reflection. We note that some stakeholders consider that 30 second breaks in play may lead to unintended consequences such as driving consumers to move machines and/or playing two machines at once. We are not currently swayed that such potential consequences support a shorter break in play, rather we consider such changes in consumer behaviour may be considered to be markers for potential harm and licensees would need to consider whether a customer interaction was appropriate in such instances.

We recognise that existing industry limit setting functionality allows consumers to modify their limits at any time, with a break in play of up to 30 seconds. In a manner that balances customer choice and protection, we propose that, where functionality is available to modify a customer set or default limit prior to it being reached, this must result in a break in play that lasts at least 30 seconds.

We consider that staff alerts are a fundamental part of limit setting functionality, something we recognised in 2015 when including staff alerts as part of the social responsibility code provision in this area for Category B2 gaming machines. We propose that reaching either a customer set or default limit must result in the provision of a staff alert that is communicated in real time and must explain what type of limit has been reached and detail sessional information in relation to elapsed time, value of deposited sums and net position. This will be mandated through a GMTS that will detail the functionality requirements that gaming machine technical operating licensees will have to comply with. Thereafter, those making a gaming machine available for use must ensure that the limit setting functionality is compliant with the GMTS in this area (we consider all licensees will be able to reasonably assess that) and that the information contained within staff alerts is acted upon appropriately and in a timely manner. This will be achieved through amendments to social responsibility code provision 3.3.3 that was implemented for Category B2 gaming machines in 2015. The amendments will see the existing text fully deleted (as it would become obsolete) and replaced with wording to reflect the new requirements.

In reaching this conclusion, we acknowledge that staff alerts do not currently form part of the current industry codes that cover AGC, bingo or casino premises. We also recognise there are technical challenges and direct costs associated with including staff alerts as part of the proposal. For example, we have been advised of technical challenges that will arise due to premises size and having gaming machines from multiple manufacturers within a single premises. Whilst we are open to exploring those challenges during consultation, our starting point is that such challenges can be reasonably overcome. Staff alerts could form an important part of any venue’s approach to monitoring their customer’s play and build significantly upon the protections already in place such as premises supervision.

We also note that industry is concerned that the volume of staff alerts generated in some premises and/or sectors may be unmanageable. Our [cross-venue gaming machines data](https://www.gamblingcommission.gov.uk/statistics-and-research/publication/cross-venue-category-b-gaming-machines-data) from 2019 (opens in new tab) can be used to generate some estimates (which rely on a number of assumptions to extrapolate data from server-networked machines to be representative of the whole market) of the potential volume of staff alerts our proposals would generate. Our analysis showed that the majority (approximately 66 to 75 percent) of alerts would be generated when time limits are reached. It also suggests that the casino sector generated the most alerts per day per premises (in the range of 150 alerts per premises per day in comparison with less than 25 alerts per premises per day for betting, bingo and AGCs). As part of the consultation exercise we are committed to collecting more up to date data from industry that will evidence the volume and type of alerts our proposals may generate.

We must also clarify that we do not think it is appropriate to make it mandatory for businesses to conduct an interaction each time a limit is reached. Rather**,** staff alerts provide a prompt to consider whether an interaction is necessary when considered alongside other types of markers and behaviours that could indicate harm. Our [formal guidance](https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators) under social responsibility code provision 3.4.1 (opens in a new tab) provides illustrative examples of indicators. The ability to monitor and identify these indicators, such as time, spend, use of gambling management tools and play, would undoubtedly be improved upon through the provision of staff alerts and the information contained within them.

By way of summary, we propose that:

* consumers must be required to make an active choice about whether to set their own time and monetary limits or rely on default time and monetary limits for customer and staff alerts
* When making an active choice, consumers must be presented, at the same time, with the options of using a ‘free text’ box to set their own limits or selecting the default time and monetary limits
* customer set time limits must not exceed 60 minutes. Customer set monetary limits must not exceed £450 of deposited sums
* customer set time and monetary limits cannot permit the customer to choose no limits (or equivalent)
* where a customer chooses to utilise the machine and/or game default time and monetary limits for customer and staff alerts, the:
* default time limit must be no longer than (every) 20 minutes
* default monetary limit must be no more than (every) £150 of deposited sums
* ‘deposited sums’ are defined as payment made, in money or money’s worth, in respect of the use of the machine since the start of the session
* reaching either a customer set or default limit must result in the provision of a customer alert that is communicated in real time
* customer alerts must result in breaks in play of at least 30 seconds
* modification of a customer set or default limit prior to it being reached must result in a break in play of at least 30 seconds
* reaching either a customer set or default limit must result in the provision of a staff alert that is communicated in real time
* staff alerts must explain what type of limit has been reached and detail sessional information in relation to elapsed time, value of deposited sums and net position
* licensees must ensure that staff alerts are acted upon appropriately and in a timely manner.

Having considered the evidence available and adopting a risk-based approach, we propose that limit setting functionality should be mandated on Category A, B1, B2 and B3 gaming machines. This proposal for these categories of gaming machine captures both new and existing gaming machines (with no exemptions for Category B legacy gaming machines or those gaming machines that are not technically capable of being updated to offer this functionality).

In relation to Category B3A and B4 gaming machines we propose 2 options for consultation:

* Option 1 - new and existing Category B3A and B4 gaming machines are in scope
* Option 2 - new and existing Category B3A and B4 gaming machines are in scope with an exemption for existing Category B3A gaming machines and existing Category B4 gaming machines when made available for use in members’ clubs, miners’ welfare institutes and commercial clubs

Option 1 has the benefits of maintaining a consistent approach to both new and existing gaming machines, retains the focus on machine categories (rather than exempting a premises type) and offers the strongest potential protection for customers.

The inclusion of new gaming machines within both options recognises that the technical capabilities of new(er) machines is similar across all Category B gaming machine sub-categories.

Option 2 better recognises that all [clubs](https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/members-clubs-and-commercial-clubs) (opens in new tab) must be set-up and mainly run for non-gambling purposes and that members clubs and miners’ welfare institutes are run for the benefit of its members and not created as a commercial enterprise. Exempting existing gaming machines from scope within clubs would remove the direct costs associated with them having to either to update existing gaming machines or remove the significant number (approximately 5,000) that cannot be updated to comply with the proposal. By limiting the potential exemption for existing Category B4 gaming machines to clubs, it removes the risk that in licensed gambling premises harmful play may shift to Category B4 gaming machines from higher category gaming machines which are in scope. This is particularly relevant to Category B3 gaming machines which have the same maximum stake (£2) as Category B4 gaming machines and offer maximum prizes that are quite close to one another (the maximum prize is £500 for a Category B3 gaming machine compared with £400 for a Category B4 gaming machine).

We note that subject to the consultation outcome we may need to make a consequential amendment to the [Code of practice for gaming machines in clubs and premises with an alcohol licence](https://www.gamblingcommission.gov.uk/authorities/codes-of-practice/guide/page/section-c-gaming-machines-in-clubs-and-premises-with-an-alcohol-licence) (opens in a new tab) to ensure that the information contained within staff alerts is acted upon appropriately and in a timely manner by club permit holders.

We are not proposing that this requirement should be applicable to Category C or D gaming machines. Setting aside the minimal risk associated with Category D gaming machines, we carefully considered whether Category C gaming machines should be in scope. On balance, we concluded that exemption was appropriate given the lower risk associated with these machines and the significant direct costs associated with implementing the proposals for both gambling and non-gambling premises such as clubs and pubs. The exception would be where a single gaming machine offers a Category C and/or D game alongside a Category B game that is within scope of this ‘limit setting’ proposal. In that instance, all available games on the single gaming machine will have to comply with the proposed GMTS for ‘limit setting’.

We propose that the implementation date for new gaming machines and/or games will be approximately (but not less than) 6 months and for existing gaming machines and/or games the implementation date will be approximately (but not less than) 24 months. We consider that the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) will determine whether a gaming machine is to be classed as a new or existing gaming machine. It is noted that where new and existing games are made available alongside one another on a single gaming machine, we propose that all games on that gaming machine will be required to comply with the proposals for ‘limit setting’ for a new gaming machine.

The following text details our proposed, new Gaming Machine Technical Standard.

**15.1 Limit setting**

15.1 Aim

To provide a customer led tool designed to support safer gambling.

15.1a Requirement

(Applicability to be confirmed)

A machine and/or game must require customers to make an active choice whether to:

1. set their own time and monetary limits for customer and staff alerts; or
2. utilise default time and monetary limits for customer and staff alerts.

When making the active choice, customers must be presented, at the same time, with the options of using a ‘free text’ box to set their own limits or selecting the default time and monetary limits.

Customer set time limits must not exceed 60 minutes. Customer set monetary limits must not exceed £450 of deposited sums.

Customer set time and monetary limits cannot permit the customer to choose no limits (or equivalent).

15.1a Implementation Guidance

Customer set monetary limits should apply to deposited sums. Deposited sums are defined as payment made, in money or money’s worth, in respect of the use of the machine since the start of the session. It would not include winnings received during a session that are subsequently staked during the session.

15.1b Requirement

(Applicability to be confirmed)

Under Gaming Machine Technical Standard 15.1a, where a customer chooses to utilise the machine and/or game default time and monetary limits for customer and staff alerts, the:

1. default time limit must be no longer than (every) 20 minutes
2. default monetary limit must be no more than (every) £150 of deposited sums.

15.1b Implementation Guidance – None

15.1c Requirement

(Applicability to be confirmed)

Reaching either a customer set or default limit must result in the provision of a customer alert that is communicated in real time.

Customer alerts must result in breaks in play. These must be at least 30 seconds long.

Modification of a customer set or default limit prior to it being reached must result in a break in play. This must be at least 30 seconds long.

15.1c Implementation Guidance – None

15.1d Requirement

(Applicability to be confirmed)

Reaching either a customer set or default limit must result in the provision of a staff alert that is communicated in real time.

Staff alerts must explain what type of limit has been reached and detail sessional information in relation to elapsed time, value of deposited sums and net position.

15.1d Implementation Guidance – None

Consultation questions

To what extent do you agree with the proposal that the scope of Gaming Machine Technical Standard 15.1 captures both new and existing Category A, B1, B2 and B3 gaming machines (with no exemptions for legacy gaming machines or those gaming machines that are not technically capable of being updated as required)?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

What is your preferred option with regards to how Gaming Machine Technical Standard 15.1 captures Category B3A and B4 gaming machines?

Please select only one item:

Option 1 - new and existing Category B3A and B4 gaming machines are in scope

Option 2 - new and existing Category B3A and B4 gaming machines are in scope with an exemption for existing Category B3A gaming machines and existing Category B4 gaming machines when made available for use in members’ clubs, miners’ welfare institutes and commercial clubs

No preferred option

Have alternative option (please specify in free text box that follows)

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.1 proposal that for new gaming machines and/or games, the implementation date will be approximately (but not less than) 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas (and supporting rationale) for the implementation date.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.1 proposal that for existing gaming machines and/or games, the implementation date will be approximately (but not less than) 24 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas (and supporting rationale) for the implementation date.

[Free text box]

Do you have any comments about our intention to use the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) to determine whether a gaming machine is to be classed as a new or existing gaming machine?

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.1 proposal that where new and existing games are made available alongside one another on a single gaming machine, all games on that gaming machine will be required to comply with the proposal for new gaming machines?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas on how such scenarios should be regulated.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.1 proposal that where a gaming machine contains games of more than one category, all games will be required to comply with the proposal based on the highest category of game available on it?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas on how such scenarios should be regulated.

[Free text box]

To what extent do you agree with the proposal outlined in Gaming Machine Technical Standard 15.1a that requires consumers to make an active choice whether to set their own time and monetary limits or utilise default limits for customer and staff alerts?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the proposal outlined in Gaming Machine Technical Standard 15.1a that customer set limits must not exceed 60 minutes or £450 of deposited sums or permit no limits (or equivalent)?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the proposal outlined in Gaming Machine Technical Standard 15.1b whereby default time and monetary limits for customer and staff alerts must be no longer than (every) 20 minutes and no more than (every) £150 of deposited sums respectively?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

Do you have any comments about using ‘deposited sums’ as the metric for customer set or default monetary limits and our proposed definition?  Specifically, we would welcome suggestions of other metrics that could be used for customer set or default monetary limits and/or alternative wording for the proposed definition.

[free text box]

To what extent do you agree with the proposal outlined in Gaming Machine Technical Standard 15.1c that requires breaks in play to be at least 30 seconds long for a customer alert and when a customer set or default limit is modified prior to being reached?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the proposal outlined in Gaming Machine Technical Standard 15.1d that requires staff alerts are communicated in real time, must explain what type of limit has been reached and detail sessional information in relation to elapsed time, value of deposited sums and net position?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposals outlined within Gaming Machine Technical Standard 15.1 – Limit setting.

[free text box]

The following text details our proposed, amended social responsibility code provision 3.3.3.

The existing wording is:

**3.3.3 - Betting B2 - time and monetary thresholds**

Applies to: All non-remote betting licences.

1. Licensees must ensure that any B2 machines that they make available for use require customers to make an active choice whether to set time and monetary thresholds for customer and staff alerts. Such thresholds must comply with any relevant requirements set out in the Commission’s machine technical standards.

The proposed wording is:

**3.3.3 – Category (applicability to be determined) gaming machines – limit setting**

Applies to: All non-remote casino, bingo, betting and adult gaming centre licences

1. Licensees must ensure that any gaming machines they make available for use comply with the Commission’s machine technical standards section 15.1 – Limit setting.
2. Licensees must ensure that staff alerts arising from the Commissions machine technical standards section 15.1 – Limit setting are acted upon appropriately and in a timely manner.

Consultation questions

To what extent do you agree with the proposal outlined in draft social responsibility code provision 3.3.3 with regards to staff alerts?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the wording of the social responsibility code provision 3.3.3 proposal?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome suggestions of alternative wording that would achieve the same policy objectives.

[Free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposals outlined within Gaming Machine Technical Standard 15.1 – Limit setting.

[free text box]

**Safer gambling messaging**

The 2015 research ['Breaks in Play: Do They Achieve Intended Aims?'](https://www.researchgate.net/publication/281174270_Breaks_in_Play_Do_They_Achieve_Intended_Aims) by Alex Blaszczynski, Elizabeth Cowley, Christina Anthony and Kate Hinsley (opens in new tab) concludes that breaks in play ought to be accompanied with warning and/or self-appraisal messages if optimal effects are to be achieved.

The 2016 study, ['Key issues in product-based harm minimisation: Examining theory, evidence and policy issues relevant in Great Britain'](https://www.researchgate.net/publication/311497416_Key_Issues_in_Product_Based_Harm_Minimisation_Examining_theory_evidence_and_policy_issues_relevant_in_Great_Britain) by Jonathan Parke, Adrian Parke and Alex Blaszczynski (opens in new tab), summarises that the provision of warnings and messages are important in informing consumers of probabilities of winning, cautioning of the potential risks associated with excessive gambling, and directing consumers to reappraise their behaviour during sessions of play. It highlights that dynamic, as opposed to static messages, tend to improve recall, gambling-related cognitions, and behaviours in the short term. Also, informative and self-appraisal messages appear to have relatively equivalent effects.

['The effects of responsible gambling pop-up messages on gambling behaviours and cognitions: A systematic review and meta-analysis'](https://www.frontiersin.org/journals/psychiatry/articles/10.3389/fpsyt.2020.601800/full) (2021) (opens in new tab) concluded that pop-up messages provide moderate effects on gambling behaviour and cognitions in the short-term and that such messages play an important role in the gambling operators' portfolio of responsible gambling tools.

Research published by the University of Bristol’s Personal Finance Research Centre in February 2022 ['Exploring alternatives to ‘safer gambling’ messages'](https://www.bristol.ac.uk/media-library/sites/geography/pfrc/FFT-SGM-Full-report-FINAL.pdf) (opens in new tab) concluded that messages should have an appropriate tone, be authentic and engaging and tailored to their target audience.

As part of industry’s voluntary limit setting functionality, breaks in play are available on the majority of Category B gaming machines in licensed gambling premises. When a customer set or default limit is reached consumers are presented with messaging that, for example:

* explains the type of limit that has been reached
* allows consumers to end the session, set new voluntary limits or utilise default limits
* provides information about sources of support such as premises staff, responsible gambling leaflets and the National Gambling Helpline (0800 8020 133).

We note that the Department for Culture, Media and Sportis committed to working with the Department of Health and Social Care and the Commission, drawing on public health and social marketing expertise to develop a new, evidence-based model for independently developed safer gambling messages. In due course, the outcomes of this work may feed into specific messaging that is displayed on gaming machines.

At this time, we propose that safer gambling messaging is mandated throughout breaks in play when a customer set or default limit is reachedor modified prior to being reached. The applicability of, and timelines for, this proposal mirror those detailed for the limit setting functionality. The proposal will ensure that breaks in play are used solely for safer gambling messaging and cannot be used for other purposes, such as the marketing of new or existing games or promotional offers.

The sessional information requirements as part of the proposal below currently include elapsed time, value of deposited sums and net position. Value of deposited sums may not be required if the consultation process concludes that net position is the most appropriate metric to use for customer set or default monetary limits.

The following text details our proposed, new Gaming Machine Technical Standard.

**15.2 Safer gambling messaging**

15.2 Aim

To provide consumers with information about safer gambling during breaks in play.

15.2 Requirement

(Applicability to be confirmed)

Safer gambling messaging must be provided throughout breaks in play when a customer set limit or default limit is reached or modified prior to being reached (Gaming Machine Technical Standard 15.1c).

Provision of information other than safer gambling messaging, such as the marketing of new or existing games or promotional offers, cannot be provided during breaks in play when a customer set limit or default limit is reached or modified prior to being reached (Gaming Machine Technical Standard 15.1c).

The safer gambling messaging must include information that:

1. for breaks in play when a customer set limit or default limit is reached, explains what type of limit has been reached and details sessional information in relation to elapsed time, value of deposited sums and net position
2. for breaks in play when a customer set limit or default limit is modified prior to being reached, details sessional information in relation to elapsed time, value of deposited sums and net position.
3. directs consumers to potential sources of support
4. allows consumers to end their session (and therefore collect any available sums) or set limits

15.2 Implementation Guidance – None

Consultation questions

To what extent do you agree with the proposal to add a new Gaming Machine Technical Standard 15.2 which would require that safer gambling messaging must be provided throughout breaks in play when a customer set or default limit is reached or modified prior to being reached?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposal that safer gambling messaging must be provided throughout breaks in play when a customer set or default limit is reached or modified prior to being reached.

[free text box]

**Display of net position and session time**

Research from Australia by Hing and Russell (2020) [‘Proximal and Distal Risk Factors for Gambling Problems Specifically Associated with Electronic Gaming Machines’](https://www.researchgate.net/publication/333655068_Proximal_and_Distal_Risk_Factors_for_Gambling_Problems_Specifically_Associated_with_Electronic_Gaming_Machines) found that longer gambling sessions and higher spend during sessions were key predictors for high-risk gambling on electronic gaming machines.

We want consumers to be provided with information that allows them to make informed choices about their gambling and regard data on spend and time as being amongst the most important in terms of helping consumers to understand their play.

Much of the research in this area is focussed on remote gambling but some studies have been completed on information provision with regards to electronic gaming machines in the Southern hemisphere. In New Zealand, a simple pop-up message feature that provides gambling session information and forces a break in play is mandatory on all electronic gaming machines in all venues. Research published in 2016 ['The Effects of Pop-up Harm Minimisation Messages on Electronic Gaming Machine Gambling Behaviour in New Zealand'](https://link.springer.com/article/10.1007/s10899-016-9603-0) by Palmer du Preez, Landon, Bellringer, Garrett and Abbott (opens in new tab) found that most participants were aware of pop-up messages (57 percent) and many saw them often (38 percent). Among gamblers who reported seeing pop-up messages, half read the message content, and a quarter believed that pop-up messages helped them control the amount of money they spend on gambling. Overall, the results suggest that the mandatory pop‐up messages have a modest effect on electronic gaming machine gambling behaviour.

‘[Making electronic gaming machines accountable: Can an Informative and Dynamic Interface Help Players Self-regulate?](https://link.springer.com/article/10.1007/s10899-019-09889-2)’ by Byrne and Russell (2019) (opens in new tab) found that an informative display (that included metrics such as total amount deposited, net profit and a session timer) had multiple benefits, including participants being more accurate in their estimates of how much money and time they had spent. Pop up messages also helped participants be more accurate in their estimates of how much they had spent.

In October 2021, we introduced the requirement for online slots to display a customer’s net position and elapsed time (session time). Our [assessment of the online games design changes](https://www.gamblingcommission.gov.uk/report/assessment-of-online-games-design-changes/outcomes-consumer-awareness) (opens in new tab) found that consumer awareness of how much time and money is spent remains high and did not change significantly in the months immediately following the implementation date. However, this statement relies on participant recall, and it is therefore unclear whether participants are reflecting on their slots play before and/or after the online game design changes came into force. It is also noted that the assessment found no negative impacts on customer behaviour arose from the changes.

The requirement to display a customer’s net position and elapsed time is being extended to all online casino products (excluding peer to peer poker) from 17 January 2025. More information on this requirement can be found in our recent publication [‘Summer 2023 consultation – Proposed changes to LCCP and RTS: Consultation Response’](https://www.gamblingcommission.gov.uk/consultation-response/summer-2023-consultation-proposed-changes-to-lccp-and-rts-consultation/proposal-6-display-of-net-position-and-time-spent) (opens in new tab).

We propose that:

* a gaming machine must be able to clearly display a customer’s net position and elapsed time since the session started.
* the display of the information for the duration, or parts of, the session must be at the discretion of the customer and no further than one action (such as a screen tap or button press) away.
* For the purpose of the proposal, net position is defined as the total of all winnings minus the sum of all losses since the start of the session and Elapsed time should be displayed in hours, minutes and seconds
* net position and elapsed time should be displayed within the safer gambling messaging provided during breaks in play when a limit setting threshold is reached (proposed Gaming Machine Technical Standards 15.1 and 15.2).

We consider our proposed GMTS drafting is sufficient in terms of outlining the outcomes we expect to see. It would be neither appropriate nor practical to impose an overly prescriptive and ultimately restrictive set of rules around points such a text size or placement.

Having considered the evidence available and adopting a risk-based approach, we propose that the display of net position and session time should be applicable to Category A, B1, B2 and B3 gaming machines. This proposal for these categories of gaming machine captures both new and existing gaming machines (with no exemptions for Category B legacy gaming machines or those gaming machines that are not technically capable of being updated to offer this functionality).

In relation to Category B3A and B4 gaming machines we propose 2 options for consultation:

* Option 1 - new and existing Category B3A and B4 gaming machines are in scope
* Option 2 - new and existing Category B3A and B4 gaming machines are in scope with an exemption for existing Category B3A gaming machines and existing Category B4 gaming machines when made available for use in members’ clubs, miners’ welfare institutes and commercial clubs.

Option 1 has the benefits of maintaining a consistent approach to both new and existing gaming machines, retains the focus on machine categories (rather than exempting a premises type) and offers the strongest potential protection for customers.

The inclusion of new gaming machines within both options recognises that the technical capabilities of new(er) machines is similar across all Category B gaming machine sub-categories.

Option 2 better recognises that all [clubs](https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/members-clubs-and-commercial-clubs) (opens in new tab) must be set-up and mainly run for non-gambling purposes and that members clubs and miners’ welfare institutes are run for the benefit of its members and not created as a commercial enterprise. Exempting existing gaming machines from scope within clubs would remove the direct costs associated with them having to either to update existing gaming machines or remove the significant number (approximately 5,000) that cannot be updated to comply with the proposal. By limiting the potential exemption for existing Category B4 gaming machines to clubs, it removes the risk that in licensed gambling premises harmful play may shift to Category B4 gaming machines from higher category gaming machines which are in scope. This is particularly relevant to Category B3 gaming machines which have the same maximum stake (£2) as Category B4 gaming machines and offer maximum prizes that are quite close to one another (the maximum prize is £500 for a Category B3 gaming machine compared with £400 for a Category B4 gaming machine).

We are not proposing that this requirement should be applicable to Category C or D gaming machines, given the lower or minimal respective risk associated with these machines. The exception would be where a single gaming machine offers a Category C and/or D game alongside a Category B game that is within scope of this ‘display of net position and session time’ proposal. In that instance, all available games on the single gaming machine will have to comply with the proposed GMTS for ‘display of net position and session time’.

We propose that the implementation date for new gaming machines and/or games will be approximately (but not less than) 6 months and for existing gaming machines and/or games the implementation date will be approximately (but not less than) 24 months. We consider that the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) will determine whether a gaming machine is to be classed as a new or existing gaming machine. It is noted that where new and existing games are made available alongside one another on a single gaming machine, we propose that all games on that gaming machine will be required to comply with the proposals for ‘display of net position and session time’ for a new gaming machine.

We recognise that our proposal will create technical challenges and direct costs for industry and that the degree of both of these factors will depend on whether a platform or game level solution is necessary. We would welcome alternative ideas on how this policy could be delivered – noting the policy objectives of accessibility and the availability of information for the duration of the session.

The following text details our proposed, new Gaming Machine Technical Standard.

**15.3 Display of net position and elapsed time**

15.3 Aim

To provide consumers with information that is designed to maintain awareness of time and money spent gambling.

15.3 Requirement

(Applicability to be confirmed)

All machine sessions must be able to clearly display a customer’s net position and elapsed time since the session started.

The display of the information for the duration, or parts of, the session must be at the discretion of the customer and no further than one action (such as a screen tap or button press) away.

15.3 Implementation Guidance

Net position is defined as the total of all winnings minus the sum of all losses since the start of the session.

Elapsed time should be displayed in hours, minutes and seconds.

Consultation questions

To what extent do you agree with the proposal that the scope of Gaming Machine Technical Standard 15.3 captures both new and existing Category A, B1, B2 and B3 gaming machines (with no exemptions for legacy gaming machines or those gaming machines that are not technically capable of being updated as required)?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

What is your preferred option with regards to how Gaming Machine Technical Standard 15.3 captures Category B3A and B4 gaming machines?

Please select only one item:

Option 1 - new and existing Category B3A and B4 gaming machines are in scope

Option 2 - new and existing Category B3A and B4 gaming machines are in scope with an exemption for existing Category B3A gaming machines and existing Category B4 gaming machines when made available for use in members’ clubs, miners’ welfare institutes and commercial clubs.

No preferred option

Have alternative option (please specify in free text box that follows)

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the wording of the Gaming Machine Technical Standard 15.3 proposal?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome suggestions of alternative wording that would achieve the same policy objectives.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.3 proposal that for new gaming machines and/or games, the implementation date will be approximately (but not less than) 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas (and supporting rationale) for the implementation date.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.3 proposal that for existing gaming machines and/or games, the implementation date will be approximately (but not less than) 24 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas (and supporting rationale) for the implementation date.

[Free text box]

Do you have any comments about our intention to use the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) to determine whether a gaming machine is to be classed as a new or existing gaming machine?

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.3 proposal that where new and existing games are made available alongside one another on a single gaming machine, all games on that gaming machine will be required to comply with the proposal for new gaming machines?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas on how such scenarios should be regulated.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.3 proposal that where a gaming machine contains games of more than one category, all games will be required to comply with the proposal based on the highest category of game available on it?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas on how such scenarios should be regulated.

[Free text box]

Do you have any comments about the ‘net position’ definition?

[free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposals outlined within Gaming Machine Technical Standard 15.3 – Display of net position and elapsed time.

[free text box]

**Awards below the stake size**

We are aware that win-line animations and other stimuli such as sound effects at the end of a game cycle can give the impression that the consumer has profited from their last spin even when the amount returned is less than the total staked. For example, a consumer may have bet 10 lines at 20p each (total stake £2) and then one line returns 80p. Whilst the total of the spin will have cost them £1.20 in this example, the single line ‘win’ may be celebrated despite the net loss.

This concept is typically referred to as “awards below the stake size” or “losses disguised as wins”.

We have significant concerns that these practices are not fair and open - they risk misleading customers about the outcome of their gamble. We therefore propose some amendments to the technical standards to promote transparency and clarity to consumers.

Awards below the stake size also raise some safer gambling concerns. [‘Future-Proofing the Industry: Towards the safer design and situation of games’](https://horizonsrg.bclc.com/content/dam/newhorizons/conferences/2020/pre-conference%20papers/jonathan-parke-nh2020.pdf) by Parke (2020) (opens in new tab) notes that academic literature highlights that awards below the stake size may be considered a risk factor because, for example,:

* customers can misinterpret awards below the stake size game outcomes as positive financial outcomes (wins) rather than negative financial outcomes (losses), potentially leading to persistent play
* players may overestimate how frequently they have won as a result of the increased winning stimuli from awards below the stake size
* awards below the stake size can provide rewarding stimuli and immersive gambling experiences contributing to vulnerable cognitive and emotional states (known as a ‘hot’ state).

The ‘overestimation’ effect of awards below the stake size was also found in a 2023 report titled [‘”Losses disguised as wins” in electronic gambling machines contribute to win overestimation in a large online sample’](https://www.sciencedirect.com/science/article/pii/S2352853223000226) (opens in new tab).

Having considered the evidence available, we propose that new Category A, B and C gaming machines must not celebrate a return which is less than or equal to the total stake gambled. We have included new Category C gaming machines in scope for this proposal because we conclude the principal driver for the proposal is a risk to the fair and open licensing objective. We do not propose that this requirement should be applicable to Category D gaming machines given the minimal risk associated with these machines.

By ‘celebrate’ we mean the use of auditory or visual effects that are associated with a win (a positive financial outcome). Our proposal also includes implementation guidance for the reasonable steps that should be taken to transparently inform the customer of the result of their game cycle. To be clear, we are not consulting on prohibiting gaming machines from providing prizes which are less than or equal to the total stake gambled. Rather the proposal is centred on limiting the celebratory effects to clearly distinguish between net winning and net losing games.

Our proposal would more closely align requirements with regards to awards below the stake size between online slots (remote technical standard 14F came into force in 2021) and new land-based gaming machines. It is also consistent with industry’s ['Land-based game design code of conduct'](https://bettingandgamingcouncil.com/uploads/BGC_Code-of-Conduct_Land-Based-Game-Design.pdf) (opens in new tab) which prohibited awards below the stake size for all new Category B and C gaming machines from 1 October 2022.

With regards to existing games, we have considered the consumer benefits against the technical challenges in identifying and updating relevant gaming machines and/or games, alongside the direct costs associated with updating or replacing such product. These challenges would impact significantly on manufacturers and suppliers, gambling premises and non-gambling premises such as clubs and pubs. We conclude that it would not be proportionate to include existing games within scope for this proposal. This approach will allow all stakeholders to focus their efforts on the proposals that we consider will have the greatest consumer benefits, namely limit setting functionality and the display of sessional information.

We propose that the implementation date for new gaming machines and/or games will be approximately (but not less than) 6 months. We consider that the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) will determine whether a gaming machine is to be classed as a new or existing gaming machine.

This proposal does not rest on the definition of a session and as such we consider there are no customer journey complexities if a consumer moves from a new to an existing game (or vice versa) or from a Category B or C game to a Category D game (or vice versa) on a single gaming machine. Therefore, where a gaming machine offers multiple games, each game will be able to comply with the applicable GMTS for this proposal as defined by its own machine category rather than the GMTS for a new game and/or the highest category of game available.

The following text details our proposed, new Gaming Machine Technical Standard.

**15.4 Awards below the stake size**

15.4 Aim

To ensure game outcomes are communicated to consumers fairly and safely.

15.4 Requirement

(Applicability to be confirmed)

A gaming machine and/or game must not celebrate a return which is less than or equal to the last total stake gambled.

15.4 Implementation guidance

By ‘celebrate’ we mean the use of auditory or visual effects that are associated with a win are not permitted for returns which are less than or equal to last total stake gambled.

The following items provide guidelines for reasonable steps to inform the customer of the result of their game cycle:

1. Display of total amount awarded
2. Winning lines displayed for a short period of time that will be considered sufficient to inform the customer of the result
3. Brief sound to indicate the result of the game and transfer to player balance.

Consultation questions

To what extent do you agree with the proposal that the scope of Gaming Machine Technical Standard 15.4 captures new Category A, B1, B2, B3, B3A, B4 and C gaming machines?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the wording of the Gaming Machine Technical Standard 15.4 proposal?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome suggestions of alternative wording that would achieve the same policy objectives.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.4 proposal that for new gaming machines and/or games, the implementation date will be approximately (but not less than) 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas (and supporting rationale) for the implementation date.

[Free text box]

Do you have any comments about our intention to use the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) to determine whether a gaming machine is to be classed as a new or existing gaming machine?

[Free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposals outlined within Gaming Machine Technical Standard 15.4 – Awards below the stake size.

[free text box]

**Prohibiting features that permit a customer to reduce the time until the result is known**

On 31 October 2022, a requirement came into force for online slots (remote technical standard 14E) that prohibited a customer from being able to reduce the time until the result was known. Such features were, for example, known as turbo mode, quick spin and slam stop.

The policy intention was to help reduce the potential intensity of gameplay and remove the artificial illusion of control that a customer may have that their interaction influenced the game outcome. We considered the requirement was supported by research such as [‘Near-Misses and Stop Buttons in Slot Machine Play: An Investigation of How They Affect Players, and May Foster Erroneous Cognitions’](https://link.springer.com/article/10.1007/s10899-017-9699-x) (2017) (opens in new tab) which found that a small but meaningful percentage (13.6) of players held an inaccurate knowledge and understanding about the role of the stop button.

Whilst we do not believe such features are widely available on gaming machines, we consider it is appropriate and proportionate to propose prohibition of such features on new Category A, B and C gaming machines. This will align requirements between online slots and land-based gaming machines more closely and work alongside the other proposals within this consultation to help make gaming machines fairer and safer for all consumers. We have included new Category C gaming machines in scope for this proposal because we conclude the principal driver for the proposal is a risk to the fair and open licensing objective. We do not propose that this requirement should be applicable to Category D gaming machines given the minimal risk associated with these machines.

With regards to existing games, we have considered the consumer benefits against the technical challenges in identifying and updating relevant gaming machines and/or games, alongside the direct costs associated with updating or replacing such product. These challenges would be evident in both gambling premises and non-gambling premises such as clubs and pubs. We conclude that it would not be proportionate to include existing games within scope for this proposal. This approach will allow all stakeholders to focus their efforts on the proposals that we consider will have the greatest consumer benefits, namely limit setting functionality and the display of sessional information.

We propose that the implementation date for new gaming machines and/or games will be approximately (but not less than) 6 months. We consider that the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) will determine whether a gaming machine is to be classed as a new or existing gaming machine.

This proposal does not rest on the definition of a session and as such we consider there are no customer journey complexities if a consumer moves from a new to an existing game (or vice versa) or from a Category B or C game to a Category D game (or vice versa) on a single gaming machine. Therefore, where a gaming machine offers multiple games, each game will be able to comply with the applicable GMTS for this proposal as defined by its own machine category rather than the GMTS for a new game and/or the highest category of game available.

The proposal relates to the base game. Feature and/or bonus rounds are not in scope as they do not require an additional stake and occur infrequently. As such the ability for consumers to interact is of lower concern from an intensity perspective.

The following text details our proposed, new Gaming Machine Technical Standard.

**15.5 Prohibiting features that permit a customer to reduce the time until the result is known**

15.5 Aim

To reduce the potential intensity of gameplay and remove the artificial illusion of control.

15.5 Requirement

(Applicability to be confirmed)

The gaming machine and/or game must not permit a customer to reduce the time until the result is presented.

15.5 Implementation guidance

Features such as turbo, quick spin and slam stop are not permitted. This is not intended to be an exhaustive list but to illustrate the types of features the requirement is referring to.

It does not apply to bonus and/or feature games where an additional stake is not wagered.

Consultation questions

To what extent do you agree with the proposal that the scope of Gaming Machine Technical Standard 15.5 captures new Category A, B1, B2, B3, B3A, B4 and C gaming machines?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the wording of the Gaming Machine Technical Standard 15.5 proposal?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome suggestions of alternative wording that would achieve the same policy objectives.

[Free text box]

To what extent do you agree with the Gaming Machine Technical Standard 15.5 proposal that for new gaming machines and/or games, the implementation date will be approximately (but not less than) 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas (and supporting rationale) for the implementation date.

[Free text box]

Do you have any comments about our intention to use the date on the respective final external test house report or internal testing documentation (as signed off by a Personal Management Licensee) to determine whether a gaming machine is to be classed as a new or existing gaming machine?

[Free text box]

Please provide an estimate of the direct costs, including rationale and calculations, associated with implementing the proposals outlined within Gaming Machine Technical Standard 15.5 – Prohibiting features that permit a customer to reduce the time until the result is known

[free text box]

**Introduction of a general licence condition under section 86 of the Gambling Act 2005**

During the process of putting this consultation package together we have explored the options open to us for handling the scenario whereby a licensee makes a gaming machine available for use that is non-compliant with the Gaming Machine Technical Standards (GMTS).

Licensee condition 2.3.1 places requirements on those that hold a gaming machine technical operating licence but it does not extend to those making machines available for use.

Section 86(2) of the Gambling Act 2005 (the Act) states that an operating licence may be subject to a condition that a specified gaming machine may not be made available for use in reliance on the licence if the Commission has notified the licensee in writing that the manufacture, supply, installation, adaption maintenance or repair of the machine:

* was not carried out in reliance on a gaming machine technical operating licence, or
* did not comply with standards established under or by virtue of section 96.

We have not previously used the power in the Act to impose such a licence condition. Currently, we can seek a resolution through engagement or, where the circumstances are appropriate (for example, if a licensee refused to remove a non-compliant gaming machine), consider a licence review because we suspect a licensee may be unsuitable to carry on the licensed activities.

The proposed changes to the GMTS could result in gaming machines which are non-compliant with the GMTS being available for use in the market, most likely when the gaming machine is owned by a licensee and/or not under any form of service contract with the holder of a gaming machine technical operating licence.

Whilst we do not expect those that make gaming machines available for use to always be aware that a gaming machine does not comply with the GMTS, we would expect them to react appropriately once they are made aware. Introducing a general licence condition would simplify our compliance and enforcement processes and enable us to ensure our requirements are met more effectively. Failure to act in accordance with a Commission notification in writing would amount to a breach of a licence condition which could result in a range of enforcement actions such as a financial penalty being imposed either following a review or without a review having taken place.

We therefore propose the introduction of a general licence condition under section 86 of the Act. The condition would be applicable to all non-remote operating licences that can make gaming machines available for use.

We propose that the implementation date for the new licence condition will be approximately 6 months. This is consistent with our GMTS proposals for new gaming machines, allowing for a co-ordinated and cost-effective approach to implementation.

The following text details our proposed new licence condition.

**Licence condition XX**

Gaming machines

Applies to: All non-remote casino, bingo, betting, adult gaming centre and family entertainment centre licences

1. Licensees must not make a specified gaming machine available for use in reliance on the licence if the Commission has notified the licensee in writing that the manufacture, supply, installation, adaption, maintenance or repair of the machine:
   * 1. was not carried out in reliance on a gaming machine technical operating licence, or
     2. did not comply with the Commission’s gaming machine technical standards.

Consultation questions

To what extent do you agree with the proposal to introduce a general licence condition?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the wording of the general licence condition proposal?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome suggestions of alternative wording that would achieve the same policy objective.

[Free text box]

To what extent do you agree with the proposal that the implementation date for the general licence condition will be approximately 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box. Specifically, if you do not agree with the proposal we would welcome alternative ideas (and supporting rationale) for the implementation date.

[Free text box]

**Industry proposals to improve consumer enjoyment and gameplay**

Introduction

As part of on-going engagement, the industry trade associations presented proposals to change elements of the Gaming Machine Technical Standards (GMTS) and Testing Strategy. During that process, they were asked to document their specific recommendations, the rationale to support their proposals and their consideration of the risk to the licensing objectives (and how that could be mitigated).

Aligned to the approach we used in developing our own proposals, we used a thorough evidence assurance process in considering the industry proposals. This included, for example, reviewing data sources, consumer benefits, impacts on licensees and available research. As a result of this process, the Commission is taking forward three industry proposals for consultation:

* GMTS 5.14 Game links – adjusting the value and the number of repeats permissible on Category C gaming machines
* GMTS 5.14 Game links – removing the need for a 50/50 chance following a losing game on Category B gaming machines
* GMTS 5.9 Live jackpots – allowing a player to gamble a live jackpot win on all categories of gaming machine

It is noted that several other proposals were discounted for a variety of reasons. These reasons included, for example, risk to the licensing objectives and the need for primary legislation which sits outside of our remit.

Our questions for these proposals do not seek to explore the direct costs associated with the proposals as licensees will be under no obligation to make changes to their existing gaming machines or design of new gaming machines.

**Game links – adjusting the value and the number of repeats permissible on Category C gaming machines**

A ‘game link’ is where an element, feature or outcome from one game is either held over or made reference to (recreated) in the next game (for example, reel band holds). Game links, with the exception of the live jackpot, are not permissible unless they comply with the requirements of Gaming Machine Technical Standard (GMTS) 5.14. Those requirements were subject to consultation in 2011, with relaxations made to permit a series of games to be linked together in a limited way following a game which awards a prize. We considered this minor amendment would allow manufacturers to develop more entertaining games and redress the balance between Category C gaming machines and legacy machines – thus assisting with the removal of legacy machines from the market.

The current proposal from the industry seeks to make further minor amendments to the number of games which may be linked together as well as increasing the value of wins generally in line with inflation since the previous changes. Industry advised that they had used the [Bank of England inflation calculator](https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator?number.Sections%5B0%5D.Fields%5B0%5D.Value=10&current_year=96.0569166666667&comparison_year=133.83) (opens in new tab) as the basis for their proposed modified values and tied these in with the adjusted game link numbers.

We note that the proposals do not exceed the current statutory maximum prize of £100 for Category C gaming machines. The reference to a maximum prize value added in any game of a linked series ‘in excess of £100’ is designed to accommodate any future changes that may be made by government to the maximum prize of £100 for Category C gaming machines.

We consider it is appropriate to consult on this proposal. Reflecting inflationary changes, in these limited circumstances, is likely to improve design flexibility and consumer entertainment in a manner that we do not consider will impact negatively on the licensing objectives. However, we do think it may be beneficial to simplify the requirements further by removing 2 of the prize bands within the table. We have therefore provided an alternative option for stakeholder’s consideration.

We propose that the implementation date for the amended GMTS would be approximately (but not less than) 6 months.

The following table details the proposed options for the amendments to Gaming Machine Technical Standard 5.14b, Option 2, Table 1.

GMTS 5.14b Requirement, Option 2

(Applicable to machines and/or games of Category C)

Table 1- Number of successful consecutive links permissible by maximum prize value for Category C machines and/or games

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Current requirement** | | **Industry Proposal** | | **Our Proposal** | |
| Maximum prize value awarded in any single game of a linked series | Maximum number of successful consecutive links permissible | Maximum prize value awarded in any single game of a linked series | Maximum number of successful consecutive links permissible | Maximum prize value awarded in any single game of a linked series | Maximum number of successful consecutive links permissible |
| £10 or less | Unrestricted | £15 or Less | Unrestricted | £15 or Less | Unrestricted |
| £15 or less, greater than £10 | 6 |
| £20 or less, greater than £15 | 5 | £20 or less, greater than £15 | 6 | £50 or less, greater than £15 | 5 |
| £25 or less, greater than £20 | 4 | £25 or less, greater than £20 | 5 |
| £50 or less, greater than £25 | 3 | £50 or less, greater than £25 | 5 |
| £70 or less, greater than £50 | 2 | £70 or less, greater than £50 | 3 | £75 or less, greater than £50 | 3 |
| £100 or less, greater than £70 | 1 | £100 or less, greater than £70 | 2 | £100 or less, greater than £75 | 2 |
|  |  | In excess of £100 | 1 | In excess of £100 | 1 |

Consultation questions

To what extent do you agree with the Gaming Machine Technical Standard 5.14b proposal to amend the value and the number of repeats permissible via game links on Category C gaming machines?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

What is your preferred option with regards to the two different proposals to amend Gaming Machine Technical Standard 5.14b?

Please select only one item:

Industry proposal

Commission proposal

Agree with proposal for change – no preferred option

Agree with proposal for change – have alternative option (please specify in free text box that follows)

Disagree with proposal for change, leave as it is

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the proposal that the implementation date for the amended Gaming Machine Technical Standard 5.14b would be approximately (but not less than) 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

**Game links – removing the need for a 50/50 chance following a losing game on Category B gaming machines**

The ‘game link’ requirements for Category B gaming machines are more stringent than those for Category C gaming machines. This reflects the respective associated risk of each gaming machine category to the licensing objectives.

In addition to the relaxations made to permit a series of games to be linked together in a limited way following a game which awards a prize on Category C gaming machines, the 2011 consultation also resulted in changes to the way game links could be provided on Category C gaming machines games which do not award a prize (a losing game). Such game links could now be awarded on a better chance than even (referred to as the ’50/50’ rule).

Whilst the Commission has discounted other industry requests in relation to game links on Category B gaming machines as we considered they posed too high a risk to the licensing objectives, we are prepared to consult on permitting Category A and B gaming machines the same allowances as Category C gaming machines in the area of game links following a losing game. The proposal would remove the 50/50 rule for game links following a losing game on Category A and B gaming machines. We consider this to be a minor change that is likely to improve design flexibility and consumer entertainment in a manner that will not impact negatively on the licensing objectives.

We propose that the implementation date for the amended Gaming Machine Technical Standards (GMTS) would be approximately (but not less than) 6 months.

The following text details our proposed options for the amendments to Gaming Machine Technical Standard 5.14a. Deletions are marked in ~~strikethrough~~. Bullets d. and e. (as shown) would become bullets c. and d. respectively if the proposal is implemented.

**5.14 Game links**

5.14 Aim

To ensure game linkages (where permitted) follow stipulated rules.

5.14a Requirement

(Applicable to machines and/or games of Category A, B1, B2, B3, B4)

A ‘game link’ is where an element, feature or outcome from one game is either held over or made reference to (recreated) in the next game (for example, reel band holds). Game links, with the exception of the live jackpot, are not permissible unless they comply with the following rules:

1. any reference or link made to any previous game must occur randomly;
2. linkages to a game are only permissible from the immediately preceding completed game;
3. ~~the chance of being awarded a link to the next game must be no better than even~~;
4. the player must not be aware as to whether a link will be given or have the opportunity to use it before there is sufficient credit available on the credit or play meter to play the game at least once by means of the machine;
5. no subsequent game link is permissible to the current game where a prize has been awarded and delivered to the player. It is not permissible to force or create a series of wins (enriched periods) using any link features.

5.14a Implementation Guidance - None

Consultation questions

To what extent do you agree with the Gaming Machine Technical Standard 5.14a proposal to permit game links on Category A and B gaming machine losing games at a better chance than even?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the proposal that the implementation date for the amended Gaming Machine Technical Standard 5.14a would be approximately (but not less than) 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

**Live jackpots – allowing a player to gamble a live jackpot win on all categories of gaming machine**

Live jackpots are subject to a number of stringent controls as laid out in Gaming Machine Technical Standard (GMTS) 5.9. The controls are designed to mitigate the risk that live jackpots, where available prize values increase during play, can lead to more intense play and increased session length.

Industry has advised that some licensees consider that the following wording of GMTS 5.9e prevents (or could be argued to prevent) a live jackpot from being subject to a further gamble when won.

1. *if an alternative prize option is selected, the live jackpot prize must remain unaffected. Once, however, the live jackpot option is selected, the live jackpot prize must be delivered and the live jackpot reduced to zero or its seeded value, regardless of whether the live jackpot is delivered directly or is subject to some intervening gamble or skill feature.*

The Commission’s current position is that live jackpots must be paid in full and, as such, cannot be subject to a genuine gamble whereby additional prizes could be won or the live jackpot prize lost (in part or full). We consider this position is well established. For example, before the Gambling Act 2005 came into effect, ‘The Consolidated UK Machine Guidelines: Revision 2 (Jan 2005) documented under Section 2, paragraph 6 that:

“The live jackpot, when won, must be paid in full, without the addition of any further value other than that necessary to round up the value so as to be payable by the machine, and must be delivered in the game in which it is won”.

Industry proposes that live jackpots should be able to be gambled, in the same manner that other prizes can be. They propose a consumer would not be required to gamble the live jackpot win, rather they could choose to do so if such features were part of the game design.

We propose to amend GMTS 5.9 to permit live jackpots to be gambled (in whole or part). Such features must not require consumers to gamble, rather they may choose to gamble or collect the live jackpot win in full at their own discretion. We consider this will provide consistency between live jackpot prizes and other prizes, enhance consumer enjoyment and not present additional risk to the licensing objectives. Any live jackpot gamble feature will be bound by the prize limits for the respective category of gaming machine. No other aspects of GMTS 5.9 – Live jackpots would be changed.

We propose that the implementation date for the amended GMTS would be approximately (but not less than) 6 months.

The following text details our proposed amendments to Gaming Machine Technical Standard 5.9. Deletions are marked in ~~strikethrough~~, additions are added in **bold.**

* 1. **Live jackpots**

5.9 Aim

To ensure live jackpots do not compromise linked game rules.

5.9 Requirement

(Applicable to machines and/or games of Category A, B1, B2, B3, B4, C, D (complex))

Except for a live jackpot, no gaming machine shall offer prizes which increase or appear to increase from one game to the next. Other than the linking permitted on jackpot prizes for category B1 machines in a single casino premises, a live jackpot shall not be linked to any other gaming machine.

Live jackpots must comply with the following rules:

1. for an electronically displayed live jackpot the true value (the prize value which may be won within the game) must be displayed to the player at all times and must be available in every game. It may only be won as a result of either:
2. a random outcome within the game; or
3. the proportion of total money contributed to the jackpot reaching a randomly pre-determined trigger limit;
4. it is permissible to use physical coins in place of an electronically displayed equivalent provided that the value of prize which may be won by the player is transparent (the player must be able to reasonably assess the total prize value on offer);
5. the live jackpot must be incremented in proportion to the money staked and by no more than the statutory maximum stake in any single game. For category A machines it shall not be increased by more than the value of the stake used to play the game in which it is incremented. It is not a requirement for the live jackpot and reserve (where used) to be incremented in unison or at the same rate;
6. the prize awarded may be comprised of a fixed value (which must be transparent to the player at all times) together with the live jackpot provided that the total (including any other prize won in the game) does not exceed the statutory maximum;
7. ~~if an alternative prize option is selected, the live jackpot prize must remain unaffected. Once, however, the live jackpot option is selected, the live jackpot prize must be delivered and the live jackpot reduced to zero or its seeded value, regardless of whether the live jackpot is delivered directly or is subject to some intervening gamble or skill feature; and~~
8. **when the live jackpot is awarded, its value must be reduced to zero or its seeded value. It is permissible for a live jackpot to be gambled (in full or part) by the player. Where such functionality is within the game design, the player must not be required to gamble, rather they may choose to gamble or collect their live jackpot win in full at their own discretion; and**
9. the value of the live jackpot or its reserve shall not influence the chance of achieving a win within the game or be used to imply that a win is more likely.

In this requirement, a ‘reserve meter’ is a second meter or display which is used to hold any value which may be raised at the same time as the live jackpot, or which holds any overspill once the live jackpot has reached the maximum level for that category of machine.

5.9 Implementation Guidance - None

Consultation questions

To what extent do you agree with the Gaming Machine Technical Standard 5.9 proposal to allowing a player to gamble a live jackpot win?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

To what extent do you agree with the proposal that the implementation date for the amended Gaming Machine Technical Standard 5.9 would be approximately (but not less than) 6 months?

Please select only one item:

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give your reasons, including any evidence, for your answer in the following free text box.

[Free text box]

**Equalities considerations**

The 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.

We currently consider that these proposals do not give rise to any known negative impacts in the context of protected characteristics under the Equalities Act but will keep this under review. We also ask a specific question in this consultation to explore any potential equalities effects for the proposals and we welcome responses in that regard.

Consultation question

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](https://www.legislation.gov.uk/ukpga/2010/15/contents) (opens in new tab), in the context of any proposals considered in this section of the consultation?

[free text box]