



## Gambling Business Group – 2023/24 Strategy Roadmap

### Strategic Aim 1 -Technology Innovation

<b>What?</b>
Create an Industry Leading Technical Innovation Forum for gambling.
<b>Why?</b>
Technology will provide the solutions to the majority of the Gambling Industry’s current and future challenges.
There is a strategic role for the GBG to play in identifying and innovating these solutions. If this Forum can think ahead of the ‘today’ and foresee future needs then the industry will have a far healthier future in prospect.
<b>How?</b>
Suggestions and creativity are encouraged from all GBG members which will then be considered by the GBG Technical Working Group (or other appropriate GBG Group). The GBG Technical Working Group will also be challenged to identify appropriate next steps to those initiatives they think should be taken forward.
The GBG secretariat facilitates the meetings and helps to stimulate conversations that will include the sharing of views and opinions.
<b>When?</b>
Work has already started with other projects lined up for 2023.
<b>Help/Resource Support?</b>
Senior executives in member organisations have confirmed their commitment to this work. Member organisations would need to support this initiative with resources and provide the time and input of any personnel identified. Meetings will continue to be held via remote means thus keeping time demands to a minimum.
<b>Indicative Costs</b>
<ul style="list-style-type: none"> <li>• The costs for the cashless work have already been covered.</li> <li>• The production of a set of standards for the linking of jackpots is a desktop/meeting exercise. Costs to cover additional scribing time over the duration of the work for Rob Wheeler should be in the region of £15k.</li> <li>• Additional contributions may be required to cover costs such as (for example) research for an evaluation process.</li> </ul>
<b>Outputs</b>
<u>Work underway</u>
<ol style="list-style-type: none"> <li>a) Remove the Prohibition on debit card use for gaming machine play – ‘Cashless’ in short . This is to enable gaming machines to compete with all other areas of retail and leisure with all types of electronic payment methods. The removal of cash also brings efficiencies, security and better player protections. It is intended that the ‘cashless’ option will be in addition to the existing cash operation.</li> </ol>

- b) **Linked Jackpots** for Gambling Machines in AGC and Bingo venues The gaming machine proposition in AGCs and Bingo venues will be vastly enhanced and more engaging if linked jackpots were to be allowed as they are in casinos. The entertainment value of machine play will be improved and venue based, supervised and social gambling will be given a much needed product boost. It is intended that this improvement will not incur any negative consequences or increase problematic play.

Future work

- a) Create a set of Industry Guidelines for the collation of **player visit and dwell time monitoring**. The Gambling Industry is missing out on a level of customer intelligence that relates to visit patterns and dwell time. This intelligence would have been invaluable during the Covid restriction setting. It would also inform business and strategy decisions for land-based operators. This additional intelligence should also positively contribute towards the credentials of the individual subsectors. the starting point for this would seem to be the creation of a set of basic information requirements that operators can use to monitor customer visit patterns.

A standard form of recording is necessary so that reliable comparisons can be made along with any relevant business decisions. Monitoring systems can then be installed in venues however the Guidelines need to accommodate all levels of technology from manual to door beams, automatic barriers and full camera facial recognition systems. We would need to assure ourselves that everything we do complies with the DPA 201.

**Updates**

**Strategic Aim 2: Land Based Reputation**

**What?**

Raise awareness and the reputation(s) of land-based gambling sub-sectors whilst also supporting and protecting the high street from further decline.

**Why?**

The high streets of Great Britain that over recent years have been falling victim of the ubiquity of supermarkets and large shopping centres, are now having to compete with the growth in online shopping, which received a huge boost during the Covid -19 pandemic. AGCs as a subsector have struggled to be recognised in parliamentary circles. This became even more pronounced when the Cabinet Office treated LBOs more sympathetically in the Covid restrictions which hurt them financially. But Bingo and casinos are also key components of the local/community product offer. Positive recognition of land-based gambling will benefit and protect their future & the future of the high street. The GBG has all of the key operators as members.

**How?**

Bring together key AGC and High Street Operators and agree a plan. to establish the key attributes that Licenced Gambling Premises on the high street bring to society, to the economy and to the high street locality.

This information will be used to improve the standing and reputation of this highly important and growing subsector and to this end, a PR and communications plan needs to be agreed and resourced.

**When?**

GBG Land Based and GBG Responsible Gambling Groups were initially set up and subsequently combined into one GBG Land Based Responsible Gambling Group. The GBG secretariat facilitates the meetings and helps to stimulate conversations that will include the sharing of views and opinions.

#### **Help/Resource Support?**

The main requirement from Members at this early stage is the commitment to making time to contribute to this important effort. Meetings will continue to be held via remote means thus keeping time demands to a minimum.

When the PR and communications plans are formed then any associated costs will need to be met by those who benefit the most from this.

#### **Indicative Costs**

- Funding may be required for the consumer research project.
- ICE funding for future years.
- An indicative budget of £20k has been proposed.PR and communications plan.

#### **Outputs**

##### Work underway

- a) The GBG Responsible Gambling Group has developed a **Responsible Gambling Charter** which was launched at ICE 2023, with work ongoing to develop metrics for monitoring compliance with the Charter.
- b) GBG is considering an agreement with YGAM as one option for **training**. GBG members can access YGAM's 6 City & Guilds Accredited Safer Gambling e-learning training at reduced rates.
- c) Discussions with GamCare and Gordon Moody about how GBG can work with them.
- d) We are considering options for an independent **consumer research** project.
- e) Engagement with **local government and councils**:
  - through the Institute of Licensing (IOL) including attending its national annual conference and regional meetings
  - f) - dialogue with the Local Government Association and Welsh Local Government Association
  - arrangement with IOL/Coinslot regarding regular GBG articles in the IOL publications and reciprocal articles in Coinslot
  - piloting training sessions between operators and LAs/police
- g) Members' Platform at ICE to specifically showcase social responsibility and consumer care in high street gambling premises.
- h) Working with WalkSafe on premises crime data mapping .

##### Future work

- a) The GBG Land Based Responsible Gambling Group will consider how to utilise the **social responsibility datasets** (from the Regulatory Returns) and other corporate social responsibility information to raise awareness of the standards on the high street.
- b) The Group will also be looking at **sharing best practice** around training.

#### **Updates**

## Strategic Aim 3 - Data

<b>What?</b>
. Produce regular consolidated (anonymised) statistical data for gambling activity/behaviour, primarily relating to gaming machine play (but not exclusively).
<b>Why?</b>
The Gambling Industry is missing a level of consumer intelligence that would enhance and benefit their business knowledge and decision making. The Gambling Regulator is progressively asking for more and more data relating to gambling activity in order to improve their knowledge and inform their decision making. The industry should be two or three steps ahead of the Regulator with their intelligence.
<b>How?</b>
GBG's senior Members endorsed this work to be taken forward by the GBG Data Group.  They will identify what intelligence would be beneficial on a monthly/quarterly/annual basis and agree as to what (if any) of this information will be made available to the Regulator.  The Data Governance Group has been created to preside over the work of the GBG Data Group to ensure we remain ethical, ensure that the DPA 2018 is being complied with and that GBG Members are confident that their own data remains anonymous.
<b>When?</b>
It is vital to progress this work so that the Regulator is not leading this effort and therefore dictating the requirements.
<b>Help/Resource Support?</b>
The GBG Data Working Group will identify the data sets and engage the GBG Technical Working Group to agree a plan to facilitate this requirement and calculate any costs for doing so and present to the GBG membership.
<b>Indicative Costs</b>
The preliminary work will be carried out via desk top and meetings. Some scribing time for a suitable author will be required in the production of the final standards with an estimated cost of £20k.
<b>Outputs</b>
<u>Work underway</u> a) Various <b>machine related data streams</b> have been identified and the data governance and GDPR implications considered.
<u>Future work</u> a) Development of a new <b>digital Machine Data Capture protocol</b> . b) <b>Exploring engagement with the pub trade bodies or machine operators as part of process to collate national pub machine data.</b>
<b>Updates</b>

## Strategic Aim 4 - Effective Regulator

<b>What?</b>
The establishment of a more effective gambling regulator for Great Britain.
<b>Why?</b>
<p>Over recent years the Gambling Commission has been taken in a direction that has less and less relevance with the Government's Regulators' Code and replaced by a disproportionate focus on sensationalising the small amount of problem gambling in Great Britain.</p> <p>The Gambling Commission has adopted the role of the champion of the Public Health Agenda for gambling, where there is no hard evidence to support such a position. The reputation of Gambling in Great Britain has suffered as a result of this deviation away from the core job of regulating. A healthy Gambling Industry needs an effective regulator, and they don't currently have one.</p>
<b>How?</b>
<p>It is important that the real causes of this situation are laid bare to those who preside over the Gambling Commission. Namely, the DCMS and its Ministers.</p> <p>The GBG has already raised all of the issues in its evidence contribution to the DCMS's Review of the Gambling Act. Subsequent meetings will continue in the same vein.</p> <p>It is also important that the Minister responsible for Gambling is as equally aware as the Department and meetings have been requested.</p> <p>Consideration should then be given to also showing the said evidence to the DCMS Select Committee who hold the DCMS accountable for their work.</p>
<b>When?</b>
This work has started- including the creation of a dossier that houses all of the relevant documents proving that the Gambling Commission is not operating effectively as a regulator which was submitted to the DCMS in their Review of the Gambling Act. This evidence has also been brought to the attention of the new Minister and senior team and also submitted to the DCMS Select Committee Inquiry.
<b>Help/Resource Support?</b>
<p>Members' contributions to the creation of the dossier was vital and should not be underestimated. It will be very helpful if Members refer to the GBG documents (or similar) when in dialogue with the DCMS and Ministers.</p> <p>Members are encouraged to keep sharing examples with GBG secretariat as it is they who continue to have first hand disappointment in engagement with the Regulator.</p> <p>The Gambling Commission is not short of critics, but there are various opinions on what the right solution to the problem is.</p>
<b>Indicative Costs</b>
<ul style="list-style-type: none"><li>• All of this work is currently being completed via the existing GBG resources and media.</li><li>• However, if there is a need to create and deliver a more comprehensive PR and communications strategy then this will need to be funded. At this time it is felt that this is unnecessary and perhaps, counterproductive</li></ul>
<b>Outputs</b>
<p><u>Work underway</u></p> <p>a) Regular dialogue with <b>DCMS</b> officials and invite to Minister to visit GBG Members' premises.</p>

- b) GBG Members identified areas for **reducing red tape** within secondary (and primary) legislation which has been shared with DCMS officials.
- c) The **GBG Licensing Group** of lawyers and in-house Counsel has been set up and will play a key role in looking at the White Paper.
- d) Regular articles in **Coinslot**
- e) Working with OPSS and BEIS to establish transparent accountability for **regulator performance**.

#### Future work

- a) Engagement with Gambling Commission on LCCP/other consultations following the publication of the **White Paper**.
- b) Submission to the **DCMS Select Committee Call for Evidence**,
- c) GBG is also a member of the **Gambling Expert Group** (along with representatives from industry, government, national and local regulators) and this Expert Group will also be looking at the implications from the White Paper.

#### **Updates**

### **Strategic Aim 5 - Growing GBG**

#### **What?**

Make the Gambling Business Group financially stable and secure its future for its members.

#### **Why?**

The GBG represents all of the major AGC and High Street Bingo Operators. It also represents all of the major slot manufacturers. If the GBG is to deliver this Strategy then it is important that its financial security and future is assured by continuing to grow its membership and offer.

#### **How?**

Following agreement from the GBG members the subscriptions were increased in 2021/02, but the fees remained static for 2022/23.

Separately, GBG is looking at how it could monetise the assets that are used by non-members. Option to license the software/ protocols and charge accordingly.

Explore a strategy to meet the objective of increasing member numbers via some form of recruitment drive.

#### **When?**

This work has already started and in 2022 the GBG had a cash flow surplus for the first time but this need to be projected into future years for the long term stability of the GBG.

#### **Help/Resource Support?**

Ongoing recruitment of new members.

#### **Indicative Costs**

The current running costs of the GBG are @210k p.a including costs for ICE 2023 but does not include budget for some of the strategic plan initiatives.

#### **Outputs**

##### Work underway

- a) GBG Membership **subscriptions remained static** for 2022/3.

- b) Additional **licensing firms invited to join**, and be part of the GBG Licensing Group
- c) A GBG **Members' engagement plan** is being developed and the website content is being refreshed.
- d) **General Manager appointed.**

Future Work

- a) **Ongoing recruitment** of new members – especially on the back of ICE.

**Updates**