

**GBG DRAFT DCMS Consultation on proposals for a maximum stake limit for online slots games – SUBMITTED ONLINE AT 0945 ON 20 SEPT 2023**

*1. For the purposes of introducing a maximum stake limit, the government intends to align with the definition of online slots used by the Gambling Commission. We therefore intend for the limit to apply to: Remote casino games of a reel-based type (including games that have non-traditional reels or which combine elements of other games within a slot game mechanic).*

**1a)** *Does this description of online slots adequately describe the products intended for inclusion in the maximum stake limit's scope?*

No.

**1b)** *Please explain your answer.*

There are numerous other styles of products such as video poker games and scratch cards that should also be considered.

*2. The government is developing a description of a maximum stake. This description will be adapted in legislation to introduce a maximum stake limit. The proposed description of a maximum stake is: 'Maximum stake per spin' means the maximum amount a player can pay or risk per spin or game cycle"*

**2a)** *Is this description of stake suitable for the purpose of the introduction of a maximum stake limit for online slots games?*

Yes.

**2b)** *Please explain your answer.*

'Spin' is for reel based games only (see answer to question 1b). Using just 'game cycle' includes any 'spin(s)' and is therefore less ambiguous and is clearly defined in question 3.

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

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

**3a)** *Is this description of game cycle suitable for the purpose of the introduction of a maximum stake limit for online slots games?*

Yes

**3b) Please explain your answer.**

This definition is 'tried and tested' and works. There is no need to change it. Equally, there is no need to introduce the word 'spin' (see question 1 above) as it is unnecessary.

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

**4a) What maximum stake limit for online slot games would you support, if any?**

£10

**4b) Please explain your answer, providing evidence where possible.**

No comment.

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

**5a) What maximum stake, if any, do you support for young adults aged 18-24?**

£4

**5b) Please explain your answer and reference any relevant supporting evidence if appropriate.**

We don't see how this would it work in practice. Would 18-24 yo only have access to particular games at this lower stake once they have logged on to their account (when most games are multi-stake)? Or would they have the full suite of games available to them which default to the lower stake having logged into their account as a 18-24 year old,

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

**6a) Are there any additional impact considerations, including on the assumptions in the accompanying impact assessment, or on the risk of unintended consequences?**

We are aware that in the Equalities Act 'age' is a protected characteristic and making assumptions that ALL under 24s need additional restrictions may not be proportionate. We would prefer that the stakes were the same as all other adults but

with additional diligence from operators for under 24s as a better consumer proposition in our view.

**6b)** *Please explain your answer and provide relevant evidence. We would particularly welcome input on transition costs, and on the impacts for small and micro businesses.*

See answer to question 6a.

*7 The Department for Culture, Media and Sport will have due regard to the public sector equality duty, including considering the impact of these proposals on those who share protected characteristics, as provided by the Equality Act 2010.*

**7)** *Please indicate if you believe any of the proposals in this Consultation are likely to impact persons who share such protected characteristics and, if so, please explain which group(s) of persons, what the impact on any such group might be and if you have any views.*

See answer to question 6a.

**8.** *Are there any other factors or points you wish to highlight that have not been consider above*

GBG Members would not want the timing of introducing this proposal to delay any review of land based Stakes and Prizes – the two issued should not be linked.