



**GBG Licensing Group
By Teams**

24 October 2023

Attendees:

Sam Moore (Buzz Bingo)	Amanda Kiernan (Merkur)
Elizabeth Speed (Novomatic)	Peter Hannibal (GBG)
Andrea McQueen (Inseinc)	Charlotte Meller (GBG)
Aras Kaplan (Leisure Electronics)	

Apologies: Felix Faulkner, David Lucas

Item 1 Minutes from July meeting

1. The Minutes agreed as an accurate record of the discussions.

Item 2 Draft Ombudsman Code of Conduct

2. The Group discussed the GBG Exec's initial comments on the draft Code that has been produced by the Betting and Gaming Council and is currently with DCMS for consideration.
3. Concerns echoed those already raised particularly in relation to:
 - The composition of the Ombudsman – how will they be both independent and suitably knowledgeable about the industry
 - How they will be in a position to determine if SR policies (and therefore the LCCP) have been breached, and in those circumstances should it be for GC to decide if there has been a breach before the Ombudsman concludes its deliberations?
 - The financial limitations of complaints out of scope i.e., losses below £2000 (for over 24 yo) or below £1000 (for 18- 24yo) and above £25,000. The lower thresholds are high for land-based gambling premises. How and who set these limits.
 - Will the costs of the process result in operators settling more complaints through their own complaints procedures
 - How and when will ADR complaints be incorporated.
 - Can a complaint be raised on behalf of someone else.

- Whilst historic complaints are not in scope, what happens if the complaint started through the operator's own procedures just before the Code of Conduct takes effect. (*post meeting note*: indication is that this would NOT be in scope).
4. **ACTION GBG to provide feedback to BGC** - who intend to hold an industry wide update session once they have had feedback from DCMS.
 5. **ACTION GBG to set up a specific session** to discuss the Ombudsman with Members.

Item 3 White Paper - various updates

6. GBG responses to the DCMS land based and the GC summer consultations have now been submitted and are available on the Members' area of the website.
7. A further consultation is expected from GC in November which will look at socially responsible incentives (free bets, bonuses, transparency of T&Cs) and gambling management tools.
8. DCMS' current consultation on the Levy runs to 14th December. GBG will be seeking views from members but some initial thoughts from the Group included:
 - a. Positive for bingo, AGC and FECs
 - b. Major concern that manufacturers are set at the 0.4% rate - it doesn't make sense given they voluntarily pay 01% now. Could undermine British manufacturing sector.
 - c. Manufacturers have the same overheads as land based B2Cs and could end up passing on additional costs to operators, who are in turn unable to pass them on to customers.
9. The Commission is reviewing the gaming machine technical standards (GMTS), initially to streamline the current 12 documents for non-remote into one document and remove any out of date info. Likely to consult @spring 2024. Subsequently will add missing info including the outcome of the DCMS consultation on cashless – some of which will be in circumstances of use and some in the GMTS.
10. GC is also considering extending its current machine testing process to other categories of machines.
11. In relation to testing new products – can products be trialling new products with customers without changes to legislation (Current framework only allows testing within a production environment).

Item 4 LA issues

12. Noted that has been an increase in planning applications for gambling premises facing more push back that licensing applications such as the recent example in [Spelthorne](#)

(applicant Astro Property MK Ltd but no details of who the operator would be, which could be a factor in the push back from the public).

13. **ACTION GBG to explore getting an article to the RPTI** or other planning organisation which communicates with council planning officers and councillors.
14. Members present said there had not been any increase in the numbers of licensing applications going to hearings – and those few that did were still granted, generally with conditions offered.
15. .Noted the offer for GBG to have a regular feature in the IOL’s legal Journal (in addition to its Link Magazine). **ACTION: GBG Licensing Group to suggest relevant topics which might be of interest to the Journal’s audience** – primarily Council legal officers and Licensing Committee members.
16. Noted that GBG had two sessions at the forthcoming IOL national training conference for all Council Licensing Officers on 16th November.

Date of Next Meeting: 30 January 2024 10 -11.30 (by Teams)