



# GAMBLING BUSINESS GROUP

Working for a brighter future

**Draft Response to GMTS Consultation**  
**For discussion on 15 May**

## Overarching Principles for GBG response

1. Should they go ahead, GMTS changes should be forward looking only - none of the changes should apply retrospectively as the costs far outweigh the theoretical benefits
2. Push back on the proposal that the entire machine is classified as new for the purposes of the GMTS when one new game is updated
3. Assuming GMTS changes are forward looking, then members' clubs should be in scope to give a level playing field- with the exception of staff alerts (*the LCCP doesn't apply in clubs so there is nowhere to hang that requirement*)

*Do you agree with these 3 principles*

# Definition of session-GC Proposal with GBG amends

- a. if a session is not already in progress, a session begins when credit is inserted by any method, or when a game is played. For the purpose of time limits & alerts, the in-session timer starts when the first game cycle commences
- b. if the machine credit is below ~~20p~~ the minimum stake for 60 seconds from the end of the last game ~~cycle~~ then the session ends
- c. if the machine credit is above or equal to the lowest single available stake and below the value of the highest single available stake for 120 seconds from the end of the last game cycle then the session ends
- d. irrespective of the machine credit, if there is no customer input for ~~240~~ 180 seconds, then the session ends
- e. if a customer presses 'Collect' at any time during a session, and all possible uncommitted credit is cashed out, the session ends
- f. any interruption to normal machine operation, for example a power cut, power off, malfunction or door open, will end the current session
- g. 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
- h. There is no tracking of gaming sessions while the machine is in demo or tournament mode

# Questions re session definition

1. Do you support the proposed amends to the definition?
2. **Manufacturers** - Once a session definition is agreed, how long will be needed to align technologies?
3. What impact, if any, will amending the definition of session have on the existing GBG (and non GBG) protocols ?

# Limit setting proposals

**Limits Proposal:** *Default 20 mins/£150 & free text box to set own limits up to max of 60mins/£450*

- ▶ Accept both default & max limits
- ▶ BUT remove free text box and just having arrows up/down

*Do you agree on both points? Or does the default need to be longer for bingo?*

**Breaks in play Proposal:** *30 secs for default/customer limits*

- ▶ Agree with 30 seconds for customer set limits
- ▶ But taper the default limits
  - 20 mins - 10 seconds
  - 40 mins - 20 seconds
  - 60 mins - 30 seconds

*Do you agree on both points?*

# Staff Alerts

**Staff Alerts Proposal:** *Staff alerts when limits are reached which are to be acted on appropriately & in a timely manner*

- These need to be system driven NOT machine driven
- Staff alerts will need a separate GBG protocol - this will take X months
- Propose that the other GMTS changes are progressed and that a delayed implementation is required for staff alerts
- In that time offer to work with GC and trial staff alerts in controlled environment (where systems can facilitate it)

*Do you agree?*

## Limit setting & Staff alerts - other points to raise

- ▶ Impossible to easily identify the customer who has reached a limit in a bingo hall. Many customers could reach it at the same time during the breaks in bingo
- ▶ Can't lock players out of bingo games. What happens if the breaks in play coincide with the start of the bingo session starts? Operator has to provide access to bingo and not just show the mandated safer gambling messaging
- ▶ GBG's MDC can capture staff alerts in real time but other dataports cannot

## Safer Gambling Messaging

**Proposal:** *Safer Gambling Messaging to be displayed with net position every time a limit is reached*

- ▶ GBG to propose that the net position information should appear and then the customer has the ability to close it down after 10 seconds, whilst the Safer Gambling messaging remains (for the rest of the timed break)
- ▶ Express concern about the outcomes of the DCMS/DHSC/GC work on SG messaging automatically feeding into messaging on machines

*Do you agree on both points?*

- ▶ **Manufacturers** - *how easy is it to update the messaging?*



## Net position

**Net position Proposal:** *Net position and time spent must be available “no more than one action away (on every game)”*

- This should not be in game (and should not be dependent on the machine platform)
- GBG to propose that :

New Games	Existing games (if they are in scope)
<ul style="list-style-type: none"><li>-Net position is in the help menu or available an action away</li><li>-Customer can close it down at their discretion</li><li>-Game cannot be played when its on screen</li></ul>	<ul style="list-style-type: none"><li>-Available from the main menu then the number of actions is irrelevant (and it could be added to older games on same cabinet)</li><li>- Customer can close down the net position window at their discretion</li></ul>

- Seek clarity on
  - Net position for bingo as a customer could be playing slots in between bingo games
  - Promo tickets & net position

*Do you agree?*

## Celebrating awards less than Stake/Spin Stop

*(new Cat A,B, C machines)*

- ▶ No concerns on either proposal now that they apply to new Cat A, B, C, machines only
- ▶ Therefore adding new games to existing machines does not impact the other games on the machine

*Do you agree?*

# Other New Proposals

## No concerns:

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

*Do you agree?*

- ▶ Introduction of a **general licence condition** under section 86 of the Gambling Act 2005
  - ▶ **BUT** The implementation date for this new condition should align with the timeline for the longest measure to be implemented
  - ▶ And we will raise the question of pubs/clubs

*Do you agree?*

## Proposed Timescales

- For new machines/games should be no less than **6 months** *How much longer is required (both for the staff alerts but also the other changes) - we need to clearly set that out*
- For existing machines/games should be no less than **24 months** *If these are in scope do you agree with this timescale?*

The intention is to use the date on the respective final external test house report or internal testing documentation (as signed off by a PML) to determine whether a machine is to be classed as a new or existing gaming machine

# Other GMTS changes

## No concerns:

- ▶ *Proposal to consolidate the 12 existing GMTS into a single GMTS*
- ▶ Note that the proposal also includes amending Cat B2 GMTS in relation to game speed of play and use of compensators and/or regulators to make them consistent with the Cat B3 GMTS now that the maximum charges for use are the same

*Do you agree with these proposals?*

- ▶ *Proposed changes to the testing strategy* with regards to obsolete material, legacy machines and wording and accessibility.
- ▶ Note this includes amending Cat B2 testing requirements to those applicable to Cat B3

*Do you agree?*