

The Gambling Business Group's response to the Consultation on proposed changes to the Gaming Machine Technical Standards, Gaming Machine Testing Strategy and Licence Conditions and Codes of Practice June 2025

Introductory questions

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- The Gambling Business Group
- I CONSENT to the publication of the name of my organisation
- A person representing a trade association

Introduction

There are several gaming machine 'technical groups' for the Gambling Commission to consider in their proposals:

1. Existing machines that cannot be upgraded to some or all of these proposals.
2. Existing machines that do have the ability to be upgraded to these new GMTS proposals
3. Existing machines that could be made compliant (or partly compliant) through the support of a back office or central system.
4. New machines.

This GBG Members' response to this consultation is underpinned by the following principles:

- Should they go ahead, the GMTS changes as currently proposed by the Commission should be forward looking only – none of the changes should apply retrospectively to older games or machines as the costs far outweigh the theoretical (and still undefined) benefits.
- We strongly disagree with the proposal that the entire machine is classified as new for the purposes of the GMTS when one new game is updated/added – this is not a proportionate change. The timescales, costs and benefits cannot be justified or quantified. However, the GBG believes that where possible, the focus should be on the machine (or system) delivering the changes, not the games.
- Assuming the GMTS changes are forward looking only, then members' clubs (Cat B3a and B4) should be in scope to give a level playing field – with the exception of the staff alert proposals.
- Assuming the new GMTS requirements only apply to new machines (or games), then the 6 months' timescale is reasonable however, as set out in our response, a much longer lead in time and effective trialling process for staff alerts is required.
- We have major concerns about the staff alert proposals, particularly the detail at proposed new Standard 15.1d. The GMTS is a technical standard. The proposed social responsibility /customer interaction requirements should sit in the Licence Conditions and Codes of Practice (LCCP).

- GBG Members are willing to work with the Gambling Commission to develop the various gaming machine protocols to facilitate the GMTS proposals, including a new 'staff alert protocol'. Compliance with said protocol(s) could then be referenced in the GMTS at a future date, once it has been fully tested and evaluated.
- Any GMTS changes that are progressed as a result of this consultation should be applied to all sub sectors simultaneously so that there are no advantages or disadvantages across the industry.
- We have concerns about the evidence base for the proposals, as set out in the attached "Assessment of the Evidence", produced by Regulus Partners.

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

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

Agree

The volume of repetition in the current 12 GMTS makes the set unnecessarily cumbersome and difficult to use. The GBG agrees that it makes sense to consolidate them into one document with the nuances to each machine category separated out.

12. 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?

The GBG membership has some concerns that in consolidating these standards, some Categories of machine may over time lose their distinctive characteristics. We would like to see assurances from the Gambling Commission that this would not be allowed to happen.

13. 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.

We are not aware of any.

14. 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?

Agree

The machines are the same apart from their Category designation.

15. 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?

No comment as no objections.

16. 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.

None that we are aware of.

Update of the Gaming Machine Testing Strategy (testing strategy)

18. 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?

Agree

All obsolete regulations should be removed at the earliest opportunity.

19. 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?

No comment as no objections to this proposal.

20. 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.

None that we are aware of.

21. 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?

Agree

We are not aware that any Cat B2 machines have been developed since the reduction in stake.

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

No comment as no objections to this proposal.

23. 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.

No comment.

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

25. To what extent do you agree with the 'session' definition?

Disagree

GBG Members largely support the definition but have proposed some improvements, which we have also discussed with the other trade bodies (BGC, Bacta and the Bingo Association) and we are all largely aligned to the new definition.

- 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** *(which is far more accurate than the inclusion of menu browsing etc).*
- 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. *(this makes the requirement relevant to all Categories of gaming machine)*
- irrespective of the machine credit, if there is no customer input for ~~240~~ **180** seconds **from the end of the last game**, then the session ends *(this time window has been shortened to avoid a new playing session being confused with any previous activity)*
- 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 **(and different categories)** subject to the conditions previously listed
- **There is no tracking of gaming sessions while the machine is in demo or tournament mode**

The GBG is also aware that there are numerous complications and conflicts when applying a gaming machine playing session and limits to such games on bingo tablets that are multi-functional (including bingo, food and beverage sales). From the consultation document, it appears that this is an area that the Gambling Commission has not considered as part of the GMTS proposed changes.

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

This information is being obtained direct from the manufacturers/developers by the Gambling Commission. However, the costs for the improved session definition above may be different to those posed by the Gambling Commission.

Where the systems and protocols could potentially be adapted for the purposes of delivering this requirement, the costs cannot be estimated until the scope of what needs to be done is agreed.

Testing requirements and scope of proposals

27. 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)?

Strongly disagree

Our Members do not believe that any of these proposals should be mandated for games or machines retrospectively.

The paucity of real evidence of the 'need' (or benefit) for this proposal (as set out in the Assessment of the Evidence) is not proportionate with the huge cost of applying them to existing Category B1, B3, B3a and B4 gaming machines.

The changes should therefore only be required on new machines and games post implementation date of the changes.

As stated in the pre consultation exercise, imposing the changes retrospectively to existing will result in:

- Loss of customer choice
- Businesses closing /job losses (specifics were provided in our pre consultation response)
- Huge costs to upgrade where the manufacturers still exist
- Manufacturers potentially refusing to upgrade resulting in even more obsolete machines (and operator costs)
- Huge increases in staff costs and system costs
- More premises shuttered up on our high streets and at our seascides.

If applied to existing games (requiring them to be sent to the test house for sign off) one operator has calculated that its back catalogue would take 18 years to change – with staggering associated costs in independent test house fees alone.

And we are sure that the Commission's data requests in support this consultation will provide further details on the numbers of machines/games that would be impacted.

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

Have alternative option

For the exact same reasons given to the previous question, the cost of implementing these poorly evidenced changes on existing machines is grossly disproportionate to the (undefined) benefit in doing so.

The GBG is in agreement that the player limit settings for time and money committed should be introduced to **new** Category B3A and B4 machines as 'good practice' irrespective of where they are located. However, if the staff alert proposals are progressed, they should not be applied in members clubs' where the LCCP has no jurisdiction.

We have consulted with the Members Club organisations and encouraged them to provide their own submissions, which we are aware will be largely aligned with the GBG's response to this question.

29. 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?

Strongly disagree

When considering solely the introduction of limit settings, the display of safe gambling messaging and net position then GBG Members are supportive of the 6-month implementation timescales, subject to the comments below regarding the date for determining when a machine is new.

If the Commission proceeds with the inclusion of staff alerts in the GMTS the proposed 6-month timescale is completely unrealistic.

- Staff alerts need to be system driven NOT machine driven, as such they require a protocol setting out the detail and therefore should not form part of the GMTS. Once a protocol has been developed, tested and evaluated (see below), a change can be made to the GMTS to require all new machines to comply with the protocol(s).
- Therefore a separate GBG protocol would need to be developed. This process involves scoping, scribing and ratifying the protocol as with all of our other standards. This would then require the production of a WSDL file to be developed for system upgrades to be tested against and refined accordingly. Only then can these changes be adopted by manufacturers and licenced operators.
- The GBG's experience of developing the original version of the TITO protocol took 18-24 months for the development of the protocol and we have no say over how quickly it is implemented.
- For staff alerts, given the potential volume of alerts involved, there would also need to be an operational lead in time to train staff and put necessary data recording and audit processes in place.
- This proposal is likely to be highly intrusive on the operation of licenced gambling premises; it is important therefore to establish whether the proposed staff alerts as written/suggested will provide a benefit or hindrance in the protection of the vulnerable. This particular point was brought to our attention via our 'Lived Experience' engagement as part of the GBG's response process.
- GBG Members are willing to work with the Commission on piloting and evaluating a staff alert protocol in controlled environments where systems can support it.
- Pilots should take place (once the other GMTS proposals have been implemented) which can tease out issues such as how it will be possible to identify the customer who has reached a limit in a bingo hall. Many customers could reach limits at the same time during the breaks in bingo, making it nigh on impossible to know who might need a staff interaction.

30. 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?

Strongly disagree

As previously stated, our Members do not believe that any of these proposals should be applied retrospectively.

The Commission's B2B and B2C data requests should have identified the volume of games and machines that may not comply if the GMTS changes are applied retrospectively, along with the cost implications for operators who would have to replace some or all of their machines. Held up against the undefined benefits that these proposals are intended to bring will clearly expose that these proposals are not proportionate.

31. 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?

GBG Members disagree with this proposal and request that the submission date to the test house is the date to determine whether a machine is classed as new or existing.

The period from submitting a product to an external test house until testing is finished could take several months due to different reasons including test house resources. This could lead to two different products being submitted on the same date but the final test house report for one is later due to lack of resources so that that product could not then be rolled out.

We are aware that other jurisdictions consider the submission date to the external test house as the key date.

32. 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?

Strongly disagree

The GBG does not agree that any existing games should be caught by these proposals for the reasons said in response to earlier questions, therefore this proposal 15.1 is superfluous.

Where the machine (or back-office Machine Data Capture system) technology is capable of adapting to the sessional and limit setting requirements, the gaming machine should be aligned accordingly. Existing games of themselves should be exempt from these proposals.

The GBG is also willing to work in collaboration with the Gambling Commission to develop the protocols and standards pertaining to machine management and TiTO systems to achieve these aims in a more cost effective and less disruptive way. For many of these proposals, developing via the system is easier, more consistent and future proofed in terms of making modifications or improvements.

33. 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?

Agree

Please note our “agreement” to this point is on the basis that this requirement applies to new machines (and games) only. The playing session needs to be governed by the machine (not the game) as do the limits. Therefore all time and money spent on all games on that machine have to be included in the session.

34. 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?

Disagree

Whilst Members support the proposal for consumers to make an active choice, we request that the free text box is replaced by a simple up/down arrows which will provide a far better customer experience.

35. 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)?

Agree

Subject to the removal of the free text suggestion to facilitate limit setting, GBG Members do not object to these time and financial limits.

36. 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?

Agree

This is already a standard on newer B3 machines.

37. 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.

We do not believe that “deposited sums” is the correct metric as deposited funds can be collected before being committed, it would therefore give a false impression of ‘spend’.

‘Committed funds’ (or ‘monies spent’) is the correct metric for monetary limits because it is the closest and most accurate representation of what the consumer is actually committing to spend on their playing session.

The position is confused further by the use of inconsistent metrics for gaming machine calculations within the consultation itself:

- a) For the purposes of calculating monetary limits it is proposing the use of 'deposited sums' (when it should actually be 'committed funds')
- b) For the purposes of calculating 'net position' it is proposing the use of 'the sum of all losses', which could be interpreted to include replayed winnings. This calculation should also use 'committed funds' as the metric.

If 'deposited sums' is used in conjunction with TiTO tickets, a consumer using a +£500 winning TiTO ticket (from a previous session) on another gaming machine will be overwhelmed with alerts before they have committed or played anything.

38. 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?

Strongly disagree

GBG Members agree that the customer set limits trigger breaks in play of at 30 seconds for customer set limits, but not for default limits.

The proposed 30 seconds for every default limit will be unnecessarily invasive and disrupting, potentially compelling customers to play more than one machine to ensure continuity of play.

We therefore suggest that for the default limits they should be tapered as follows:

- 20 mins – 10 seconds
- 40 mins – 20 seconds
- 60 mins – 30 second
-

Customer set limits should over-ride all mandatory limits, including an option to 'set no limit' on Category B1 machines.

Clarity is sought on the implications for bingo. Bingo main intervals are normally 20 minutes, which conflicts with the default 20-minute alert due to the following mandatory 30 second wait time.

The operator has to provide access to the bingo products on the tablet, yet if the breaks in play coincide with the start of a bingo session there is a risk that the customer be prevented from playing bingo (because of the mandatory break in play and display of Safer Gambling messaging).

The GBG is very concerned about the impact that this proposal will have on Community Games. It is important therefore that this genre of gaming machine is exempt from this proposal until a suitable solution that does not adversely affect consumers can be agreed.

39. 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?

Strongly disagree

In addition to our earlier comments about not including staff alerts in the GMTS, but in a separate protocol which is referenced in the GMTS, we have the following observations:

- Older machines cannot communicate in 'real time' due to inbuilt latency (in the Bacta Data-Port), which is another issue in support of the position that these GMTS changes should apply to new machines and games only.
- There are also concerns about the volume of non-essential alerts being sent to staff, causing a distraction from the important tasks they have to do.
- Potentially millions of alerts /year across each sector will bring the unintended consequences of:
 - distracting staff from important consumer service provision and compliance work and
 - Lived Experience say staff will be far better being focused on observing and interacting with genuine concerns rather than being faced with the 'white noise' generated by so many alerts.
- It is very unclear as to what staff are expected to do with the alerts when they receive them. What constitutes “ *Acting on them in appropriate and timely fashion*”, especially given the potential volumes involved?
- We continue to have serious concerns about the implications of tagging an alert to an anonymous consumer, and then somehow advising those on the next shift as to which consumers have already triggered an alert. This has inherent GDPR implications, and we are keen to work with the Commission in piloting approaches to staff alerts to unpick these issues.

40. 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.

This information is being obtained direct from the manufacturers/developers by the Gambling Commission. However, the costs for a system driven solution may be different to those posed by the Gambling Commission.

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

Strongly disagree

As previously stated, we disagree with reference to staff alerts in the GMTS at this point in time. SR Code 3.3.3.(2) should only be introduced once appropriate staff alert protocols have been developed, tested and evaluated.

Additionally it is important to note that staff alerts in real time cannot be applied to older machines using the Bacta Dataport because the technology won't accommodate them, which is another reason any GMTS changes should be forward looking only.

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

Strongly disagree

See our response to previous questions and our fundamental concerns about staff alerts. If the Commission proceeds with this change at this time, then clear guidance is required from the Commission on what is meant by “*acted upon appropriately and in a timely manner*”; including what is the expectation of the outcome of the staff alerts, what information is to be recorded and for how long.

43. 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.

This information is being obtained direct from the manufacturers/developers by the Gambling Commission.

Safer gambling messaging

44. 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?

Disagree

Whilst we have no objection to the principle of showing Safer Gambling messaging, this messaging should be delivered through the system (and not game controlled) which would also make it more straightforward to update in future.

Messaging should be consistent across the machines and sectors. However, we have concerns that the outcomes of the current DCMS/DHSC/GC research on safer gambling messaging will be automatically imposed on gaming machines. This potential new development will need proper governance and process.

Our Members’ main concern relates to the automatic display of net position as part of the Safer Gambling messaging. The proposal at GMTS Standard 15.3 allows customers to choose to access their position. The proposal at GMTS Standard 15.2 takes away that choice and forces it to appear on screen.

If this proposal goes ahead, we believe that the customer should have the ability to close down the net position after 10 seconds, whilst the Safer Gambling messaging remains for the rest of the timed break. Giving the option to close it down means they will have to actively engage and take note of their net position.

As mentioned in our responses to the limit setting questions, if the Commission proceeds with a 30 second break in play every time a limit is reached, it will have the potential to encourage consumers to start the habit of also playing the next machine (and so on) to alleviate the wait time, potentially not paying any attention to the safer gambling messaging and undermining the sessional reporting.

The 30 seconds in this proposal cannot be on top of the 30 second transaction wait time to be introduced with the cashless, leading to a full minute before a consumer can play. This unintended consequence needs to be looked at and dealt with.

45. 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.

This information is being obtained direct from the manufacturers/developers by the Gambling Commission. However, the costs for the additional proposals above may be different to those posed by the Gambling Commission.

Display of net position and session time

46. 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)?

Disagree

As previously stated, we disagree with any proposal applying to existing games and machines.

One click away' means every game on a terminal would have to have the button and functionality installed - as opposed to it being displayed in the menu that covers all games. Therefore GBG Members are opposed to this information being available "in game" due to the cost and timescales of making the change.

The Commission's aim to have such information "no more than one action away" can be achieved for all games going forward by making it available in the main menu. Customers can access their net position in one action (via the main menu button), where it will be on display and they can close it down at their own discretion.

Clarity is sought on the definition of "Net position" for bingo as a customer could be playing slots and purchasing food and beverages in between bingo games

We also seek clarification in relation to the use of promotional tickets, which we suggest are included in the session time but not session spend (any cash matching should be included in session spend).

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

Have alternative option

For the exact same reasons given to the previous question, the cost of implementing these poorly evidenced changes on existing machines is grossly disproportionate to the (undefined) benefit in doing so.

The GBG is in agreement that net position measure should be introduced to **new** B3A and B4 machines irrespective of where they are located, including members etc clubs.

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

Agree

We agree with the proposal (subject to it being applicable to new machines/games only) but only on the basis that net position is displayed one click away in the main menu and that the definition of 'net position' is better clarified.

49. 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?

Strongly disagree

When considering solely the introduction of net position (along with limit settings, and display of safe gambling messaging) on new machines and games then GBG Members are supportive of the 6-month implementation timescales, subject to the comments below about date for determining when a machine is new.

50. 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?

Strongly disagree

As previously stated, our Members do not believe that any of these proposals should be applied retrospectively. The paucity of real evidence of the 'need' (or benefit) for this proposal (see the separate review of the evidence) is grossly disproportionate to the huge cost of applying them to existing Category B1, B3, B3a and B4 gaming machines and games.

We understand that the Gambling Commission has obtained the implementation cost for existing games information direct from the operators themselves which will support this position.

However, the GBG agrees that these proposals should be forward looking and applied to new products.

The GBG is also prepared to work in collaboration with the Gambling Commission to develop the protocols and standards pertaining to machine management and TiTO systems to achieve these aims in a more cost effective and less disruptive way. But this will take time, effort and willingness from all parties.

51. 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?

GBG Members disagree with this proposal and request that the submission date to the test house is the date to determine whether is machine is classed as new or existing.

The period from submitting a product to an external test house until testing is finished could take several months due to different reasons including test house resources. This could lead to two different products being submitted on the same date but the final test house report for one is later due to lack of resources so that that product could not then be rolled out.

We are aware that other jurisdictions consider the submission date to the external test house as the key date.

52.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?

Strongly disagree

As previously stated, our members do not believe that any of these proposals should be applied retrospectively and therefore, we strongly disagree that an entire unit must be classified as new if one game is updated as the substantial time and cost to update all games is not proportionate.

The net position calculation needs to be made at the gaming machine level, not in the games. Where the machine (or the system) makes the calculation, it will include all content and all activity in that playing session.

53.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?

Agree

Please note our “agreement” is on the basis that this requirement applies to new machines only. The playing session needs to be governed by the machine (not the game), therefore all time and money spent on all games on that machine have to be included in the session.

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

We have concerns about the definition of net position and how it could be open to interpretation.

For the purposes of calculating ‘net position’ the proposal suggests using the ‘*the sum of all losses*’. This definition implies that gaming machine playing spend is always a loss, and wins are not possible.

‘Sum of all losses’ is not a recognised term in the gaming machine industry and there is a danger that it could be interpreted to include replayed winnings, which will produce a very different and confusing outcome.

We propose that in ‘layman’s terms’, the calculation should be:
Monies spent less monies won = net position, where:

- Monies spent (a) = committed sums, the value of the actual cash inserted into the machine that the consumer has spent on playing games.
- Monies won (b) = the value of winnings that the consumer is able to collect (at that time) from the win bank
- Net Position = committed sums (a) minus (b) the win bank.

55. 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.

We understand that the Gambling Commission has obtained this information direct from the manufacturers.

Awards below the stake size

56. 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?

Strongly agree

We welcome the Commission's change of position from the pre consultation so that this measure only applies to new machines/games. GBG members have no issue in committing not to introduce this feature on any future machines/games.

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

Agree

No comment.

58. 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?

Agree

We have no objections to the timescales for this positive change.

59. 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?

As previously stated GBG Members disagree with this proposal and request that the submission date to the test house is the date to determine whether a machine is classed as new or existing.

The period from submitting a product to an external test house until testing is finished could take several months due to different reasons including test house resources. This could lead to two different products being submitted on the same date but the final test house report for one is later due to lack of resources so that that product could not then be rolled out.

We are aware that other jurisdictions consider the submission date to the external test house as the key date.

60. 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.

We understand that this information is being obtained direct from the manufacturers/developers by the Gambling Commission.

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

61. 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?

Agree

We welcome the Commission's change of position from the pre consultation so that this measure only applies to new machines. GBG members have no issue in committing not to introduce this feature on any future games, although we do reiterate the point made in our pre consultation submissions that all games are governed by the 2.5 second rule anyway.

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

Agree

No comment.

63. 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?

Agree

We have no objections to the timescales for this positive change.

64. 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?

GBG Members disagree with this proposal and request that the submission date to the test house is the date to determine whether is machine is classed as new or existing.

The period from submitting a product to an external test house until testing is finished could take several months due to different reasons including test house resources. This could lead to two different products being submitted on the same

date but the final test house report for one is later due to lack of resources so that that product could not then be rolled out.

We are aware that other jurisdictions consider the submission date to the external test house as the key date.

65. 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

This information is being obtained direct from the manufacturers/developers by the Gambling Commission.

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

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

Agree

This new condition will provide the Gambling Commission with the option to enforce against operators where they are knowingly making a machine available for use that does not comply with the GMTS. Clarification is sought on how this will be replicated for premises that do not have a gambling premises licence knowingly siting machines that do not comply with GMTS i.e. machines in pubs and clubs.

Clarification is also sought that there will be opportunity to remove it immediately before enforcement commences, if an operator identifies that a machine that does not comply has been inadvertently made available for use.

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

Agree

No objection, subject to the above comments.

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

Strongly disagree

The implementation date for this proposal should align with the timeline for the longest measure to be implemented – our response sets out that this will be the implementation of the staff alerts measures.

Industry proposals to improve consumer enjoyment and gameplay

70. 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?

Agree

Our agreement is on the basis that the changes apply to new machines and games only and not retrospectively. These proposals will improve the consumer experience and entertainment from playing machines.

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

Industry proposal

The industry proposal will provide more entertainment and better playing experience for the consumer because games designers know the optimum combinations.

72. 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?

Disagree

It should be left with the game developers as and when the optimum time is for these changes to be introduced and is subject to confirmation that the change only applies to new games/machines.

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

73. 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?

Agree

As previously stated, our agreement is on the basis that the changes apply to new machines and games only and not retrospectively. This proposal helps to clarify the regulations enabling a better playing experience for the consumer.

74. 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?

Disagree

It is for the games developers and designers to decide the optimum time to implement these changes and is subject to confirmation that the change only applies to new games/machines.

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

75. 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?

Agree

Our agreement is on the basis that the changes apply to new machines and games only and not retrospectively. This change will enhance the player experience and their enjoyment of the games.

76.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?

Disagree

It is for the games developers to decide when the optimum time is to implement these changes and is subject to confirmation that the change only applies to new games/machines.

Equalities considerations

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](#) (opens in new tab), in the context of any proposals considered in this section of the consultation?

No comment.