**The Gambling Business Group's submission to the Gambling Reform APPG's Inquiry: The Future of Gambling Regulation in the UK September 2025**

The Gambling Business Group (GBG) is a representation of Business to Customer (B2C) and Business to Business (B2B) gambling organisation members from all sectors of the UK Gambling Industry but primarily focused on land-based gambling. This includes Bingo, Betting, Adult Gaming Centres (AGCs), Family Entertainment Centres (FECs), Pub Retailers, and Gaming Machine Manufacturers and Suppliers. In addition to these key members there is also a strong representation from supporting businesses that include legal, finance, consultancy and compliance. The Gambling Business Group represents the most comprehensive spectrum of industry stakeholders in the UK.

1. **Whether the current regulatory framework is sufficient for regulating the evolving gambling landscape and reducing harm**

The White Paper (WP) was the fruition of a Review which promised to modernise the regulatory framework and make it fit for the digital age.

The initial Review recognised it is important that people are protected wherever they gamble and that there is a strong gambling industry which supports jobs and individual choice, and an equitable and proportionate approach to regulation across different types of operators. That approach hasn't been apparent for the high street sector which is being left behind.

The continued delay to proposals makes it increasingly difficult to keep up with the digital age and meet customer needs. Delays to changing the 80:20 rule and no progress on plans to allow cashless payments are also having an impact on confidence and investment in the industry, and that is filtering through to the high streets and the thousands of associated jobs.

Investment has slowed down on the high street (borne out by fewer gambling premises). Too many businesses have not recovered from the lockdowns and are now suffering from the Government's additional taxes on doing business and employment.

We want to see an evidence based proportionate approach to future changes (see Q8) and would welcome the APPG's support in progressing the WP's land-based gambling proposals and for a Triennial Review of Stakes and Prizes which, despite its title, has not happened since 2013.

2. **How could the legislative framework be adapted to best ensure effective regulation of the gambling industry long-term reduction of harm and futureproof against next and emerging technologies**

- Better long-term planning between the Gambling Commission (GC) and the industry to identify long term goals/objectives and agree a roadmap to get there.

- Whilst we have WP proposals we don't have clear implementation timescales. Reviewing and prioritising those which are neutral or pro-growth without increased harm would support the industry and those employed in it. This could be twin tracked with looking at developments in technology to support any remaining proposals.

- It is worth noting that "gambling harm" is still a nebulous strategic target because there is currently no measurable definition of it, and the latest data shows problem gambling rates remain statistically stable (0.4% APMS Survey of Mental Health & Wellbeing, England 2023/24). Further information is available in this gambling factsheet.

- Progressing the changes will enable further social responsibility measures to be put in place to reduce these low levels of problem gambling further.

3. **Whether current gambling policy and legislation adequately intersects with wider policy areas, such as public health, criminal justice, the coronary system, financial services, local government, the economy and taxation.**

The Financial Conduct Authority could do more to protect the vulnerable, as they have much broader access to consumers' financial information and insight into their vulnerability and affordability.

We are concerned that a cohort of people severely affected by past gambling activity and behaviours are having a disproportionate effect on gambling policy. See this Chris Snowdon article as an explanation to why this should be a concern to everyone.

4. **The suitability of current harm prevention measures, including staking limits, the statutory levy, and financial risk checks**

We have responded to the GC's recent consultation on Gaming Machines Technical Standards and welcomed the proposed changes around limit setting (which is something the land-based industry had already voluntarily put in place on digital machines). However the emphasis throughout the consultation was on restrictions and limitations rather than on "safe by design" and increasing controls as harm increases rather than prohibition.

We welcome the WP evaluation plan as it is imperative that the impact and effectiveness of all WP changes are evaluated, before further changes are implemented. However, the lack of reference to industry involvement in the process is a missed opportunity.

5. **Optimal strategies for the implementation of the statutory levy on gambling operators and ensuring its long-term success**

See Q7 response.

6. **How best to deliver on the proposal to deliver an ombudsman as set out in the 2023 Gambling White Paper**

Much progress had been made on an Ombudsman Draft Code of Conduct - led by Betting & Gaming Council with considerable input from our Members. The WP proposed this would not be a statutory requirement and therefore does not require legislation change, yet even this "priority" has been on pause for well over a year with no marked progress and we hear that different approach may now be taken.

7. **Optimal strategies for ensuring the long-term success of the Statutory Levy and the delivery research, treatment and prevention work**

- Transitional arrangements to the statutory levy have been badly handled. Lack of clarity around continuity of funding has put the vulnerable and key jobs at risk.
- Independent governance is critical to its success including the allocation of all funding with independent evaluation of all spending to ascertain whether it has been spent responsibly and effectively.
- Proper analysis of the suitability and reputation of existing funding recipients before compounding bias, weakness and gaps by just handing them levy funding.
- A robust transparent approval, monitoring and outcome (end to end) review process for all projects/funding recipients.
- Research to be independently peer reviewed by default (with no links to anti-gambling organisations).
- Transparency of how, why, where and when every £ is spent (annual report).
- Publicly available mapping of all services, what they offer and how to access.
- It is worth noting that a strong levy requires a strong, long-term industry to fund it.

8. **The suitability of proposed liberalisation of land-based gambling regulations outlined in the 2023 Gambling White Paper**

We welcome the WP proposals but do not regard them as liberalising. Rather they are steps to bring a 20-year-old piece of legislation in line with technology developments to ensure that the Regulations provide the maximum protection to the vulnerable.

For example: The current legislation prohibits the use of debit cards directly with gaming machine play when the rest of society has largely moved away from cash transactions in favour of digital or cashless payments.

Changing the 80:20 would bring the sector into the modern era allowing venues to be more energy efficient and reduce unnecessary costs. There is no evidence that any additional gambling related harm will be caused as the machines that will be removed will be those that are not capable of supporting social responsibility tools whilst leaving only machines that customers want to see and play.

Other changes would just mandate what the industry has been voluntarily doing already for some time e.g. not allowing under 18s to play slot style Category D machines.

**9. What further steps should be taken on the issue of gambling advertising, sponsorship and marketing**

Restricting responsible licensed operators from educating the public through advertising and marketing would only give extra advantage to the black-market, who carry advertising without responsible gambling messaging.

**10. How to ensure the effective regulation of new and emerging forms of gambling (inc. crypto gambling, social casinos)**

Establish a horizon scanning working group comprised of all stakeholders, chaired by the DCMS.

**11. The efficacy of current regulatory efforts by the Gambling Commission and other relevant bodies**

- We are concerned by the inconsistent approach by GC to compliance visits whilst not addressing long standing noncompliance. (Two independent AGCs in Portsmouth who are not GBG members, have not been operating a self-exclusion scheme since 2016).

- Also concerned that GC undertakes consultations on poorly informed proposals, often without any evidence base, and will rarely make changes, despite robust evidence-based responses to the contrary. Impact assessments should form an integral part of its consultation proposals and not be produced afterwards based on responses received.

- See the GBG response of 15 August 2025 regarding the efficacy of licensing authorities regulatory activities. (Copy attached)

- The Health & Safety Executive has a shared regulatory plan with local council health and safety officers. A similar arrangement for GC and LAs would produce a robust evidence base of compliance in land-based premises.