



GBG RESPONSE TO DCMS' CONSULTATION ON LICENSING FOR BINGO PREMISES

Overview

As with the Category D consultation, there is no clear evidence of what the proposed changes are aiming to fix in current legislation other than anecdotal confusion over premises type.

The consultation references *'the distinction between some licensed bingo premises and AGCs is unclear to many consumers'* yet no further information or evidence is provided on how many consumers, who are they and what were they asked or what the harm is being caused. We are not aware of any complaints of customers 'misunderstanding' the type of premises that they are entering and would have expected such evidence to be included in support of the proposed changes.

There is another reference in point 13, *"A clear delineation between different types of licensed gambling premises..... is important to ensure that the gambling licensing system and regulatory framework are fit for purpose."* Again, whilst the consultation document sets out several opinions, there is no material evidence provided that supports the view that the current regulations are NOT fit for purpose or that regulating is made difficult by the current drafting.

Without a clear evidenced based objective, it is impossible to determine whether the proposals in the consultation are proportionate or not, because we don't know what we are measuring them against.

If the objective is to satisfy the alleged confusion in current regulations, then the GBG does not believe that the proposals in this consultation are at all proportionate.

The proposals do not recognise the importance of bingo in local communities; they would stifle future innovation and result in disproportionate burdens on licensed operators and on local authorities.

Furthermore they are not aligned with the Government's Growth Agenda and its commitment to reduce regulatory administrative costs.

The GBG therefore disagrees with most of the proposals. However, as set out in our responses the GBG believes there is an easier way to address any alleged confusion between bingo and AGCs in a much simpler, less costly and less onerous way that would not require legislative changes.

- We would welcome the opportunity to work with the Gambling Commission and the other trade bodies on additional information to be included in the

relevant parts of Licence Conditions and Codes of Practice (LCCP), and /or the Gambling Commission’s [“How bingo is defined”](#) guidance or the [bingo and casino technical requirements](#).

- Appropriate additional information about bingo could then be incorporated in the Guidance to Licensing Authorities (GLA).
- We are not aware of any complaints about issues associated with bingo premises having alcohol licences. Any Government concerns should be addressed via alcohol licensing not gambling legislation.

In summary:

Address Self Exclusion confusion issues	Amend LCCP 3.5
Address facilities for bingo issues	Review LCCP 9.1.2.1 (or How bingo is defined guidance /bingo technical standards)
Address premises presentation issues	Enforce LCCP 9.1.2.3 (or How bingo is defined guidance/bingo technical standards)
Provide more information & guidance for Licensing Authorities	Review GLA Part 18 and/or information via the Local Government Associations
Address alcohol concerns	Via existing powers in Licensing Act 2023 and Licensing (Scotland) Act 2025 and associated guidance

The Bingo Area

1. Should there be an area in licensed bingo premises dedicated to facilities for bingo? (Yes / **No** / Don’t know)

a. Please explain your answer, providing any supporting evidence where available. (Free text box)

To currently comply with LCCP 9.1.2.1, bingo licensed premises must have substantive facilities for non-remote bingo. The GBG does not believe that also mandating an area dedicated for bingo is necessary, proportionate or an achievable approach (see Q2).

Many premises [already have](#) specific areas where bingo facilities are available e.g. bingo seating areas. For any existing premises where, according to this consultation, the bingo facilities are allegedly less obvious, we believe this can be addressed with simpler and less costly changes. For example premises could avoid costly reconfiguration and redrawing of plans, by having appropriate signage making it even clearer where the bingo facilities are located (see Q12).

Minimum floor space for the bingo area

There are four options being considered for the percentage of the total premises floor space that should be dedicated to the bingo area:

- A. No minimum percentage of floor space dedicated to the ‘bingo area’
- B. 30% dedicated to the ‘bingo area’
- C. 40% dedicated to the ‘bingo area’

D. 50% dedicated to the 'bingo area'

2. Please rank these four options in order of preference, where 1 is the most preferable. Select each option to move its position in the ranking. a. Please explain your answer, providing supporting evidence where available. (Free text box)

We do not believe that a percentage of the floor space should be dedicated as a bingo area.

As drafted the bingo area would be percentage of the total overall premises including back of house and kitchen areas, cloakrooms, toilets etc. Even larger bingo premises would struggle to meet a minimum of 30%. For example, the balcony or mezzanine upper seating areas (that are no longer used) would be included in the calculations. Even if the minimum percentage could currently be met, future changes to the venue could potentially be stifled.

Our response to the Q13 provides more details about the cost implications of this and other proposed changes.

Gaming machines in the bingo area

3. Do you agree with the Government's proposal that cabinet and in-fill gaming machines should not be permitted within the bingo area? (Yes / **No** / Don't know)

a. Please explain your answer, providing any supporting evidence. We particularly welcome evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available. (Free text box)

Our response reflects the GBG position that we do not agree with having a dedicated bingo area. Most machines in bingo venues are already located away from bingo playing positions but not all of them. We do not believe that mandating for cabinet and in-fill gaming machines to be located in a separate area achieves anything more than is currently the case.

Mandating specific gaming machine areas at set distances from where bingo is available would inevitably lead to complicated layout calculations, especially in holiday parks. It could potentially give rise to presenting like a "split premises".

If the Government progressed the concept of a dedicated bingo area it would be illogical not to allow gaming cabinets/ infills in the bingo area, not least as tablets can currently offer both gaming content and bingo.

However, we would not expect to see gaming machines/infills sited in amongst any bingo table and chair playing positions as this could further compound any alleged confusion over the type of premises and facilities on offer. There is no reason they shouldn't be adjacent to any table and chair bingo playing positions.

We note that the consultation does not address where single cabinet bingo only machines could be sited if this proposal were to be progressed.

4. Do you agree with the Government's proposal that all tablet gaming machines permitted in the bingo area should offer bingo?

- **Yes**
- No, tablet gaming machines permitted in the bingo area should not have to offer bingo
- No, only some tablet gaming machines permitted in the bingo area should offer bingo
- No, no tablet gaming machines should be permitted in the bingo area
- No (for another reason)
- I don't know

a. Please explain your answer, providing any supporting evidence. (Free text box)
Tablets can currently offer both gaming content and bingo – which the Government intends to retain.

5. Do you agree with the Government's preferred approach that there should be a minimum distance between the bingo area and any cabinet or in-fill gaming machines in a bingo premises?

- Yes, there should be a minimum distance
- **No, there should not be a minimum distance**
- I don't know

a. Please explain your answer, providing any supporting evidence. (Free text box)
As long as the cabinets or infills are not located in the dedicated bingo area then it is down to individual premises to decide the location of the machines, as each site will have unique layout permutations which could not be catered for if there is a set minimum distance.

There is no need for a minimum distance if there is no "mandated dedicated bingo area". However if the proposals are progressed, we offer the following observations about minimum distances.

- they are hard to define (as premises and obstacles are unique and accessibility will be factor)
- they are difficult to regulate for Licensing Authorities (LAs), and open to misinterpretation even if LA officers are carrying tape measures at all times.
- mandating a minimum distance could impact on future changes to the size of cabinets and infills, potentially stifling future innovation to machine size (*the previous Government had proposed machine definitions in the supplementary consultation on 80:20 rule*).
- what happens if a machine needs to be temporarily moved to carry out works, thereby breaking the minimum distance requirements?
- mandating a minimum distance could potentially lead to unintended consequences from a fire risk assessment perspective.
- Any future layout changes would require costly new drawings and perhaps approvals.

Overall this is a very clunky and disproportionate proposal with little or no regulatory benefit.

6. Which of the proposed minimum distances between the bingo area and any cabinet or in-fill gaming machines would be most appropriate?

A: 0.5m

B: 1.0m

C 2.0m

D: *An alternative distance would be more appropriate (please provide a distance)*

a. Please explain your answer, providing any supporting evidence. (Free text box)
As stated in our response to Q5 the benefits of stipulating a minimum distance are unclear. Without mandating a distance, premises will have more scope to adapt layouts to accommodate our other suggested proposals about the presentation of bingo facilities.

Gaming machine content on EBT's

Option A) In licensed bingo venues, all gaming machine content currently permitted (Category B3, B4, C and D content) in bingo venues should be permitted in the bingo area on tablets that offer electronic bingo

Option B) In licensed bingo venues, only Category C and D gaming machine content should be permitted in the bingo area on tablets that offer electronic bingo

Option C) In licensed bingo venues, no tablet gaming machines should be permitted in the bingo area

The Gambling Commission provides an overview of gaming machine categories.

7. The Government's preferred option is to permit all currently permitted categories of gaming machine content on tablets that offer electronic bingo in the bingo area (Option A). Do you agree with this preferred option?

- *Yes, I agree with Option A*
- No, I prefer Option B
- No, I prefer Option C
- No (another reason)
- Don't know)

a. Please explain your answer, providing supporting evidence. We particularly welcome evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available. (Free text box)

The GBG supports the Government's proposal to maintain gaming content on EBTs. The other options would have a disproportionate impact on operational burdens and the customer experience. Furthermore, from a technology perspective, we are not aware that it is possible to restrict certain tablet games to only be accessible outside of any "bingo area", if that proposal were to be progressed.

Positions in the bingo area

There are four options in relation to positions in the bingo area.

A. No minimum positions

B. Minimum of 30 positions in the bingo area

C. Minimum of 40 positions in the bingo area

D. At least one distinct position for every 2.5 square meters of floor space in the bingo area up to 200 square metres. Where the bingo area is over 200 square metres in size, a minimum of 80 positions only. There should be a minimum of 30 positions for bingo in the bingo area, no matter how small the venue.

8. Do you agree with the government's proposal that there should be a requirement for a minimum number of positions in the bingo area?

- Yes
- No
- **I Don't know**

a. Please explain your answer, providing supporting evidence where available. We particularly welcome supporting evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available.

[As stated in our response to Q11 we would welcome further discussions with the Government and the other trade bodies about the possibility of defining a player position. In the absence of an agreed player position definition we cannot be drawn on whether there should be a minimum number, nor what that number should be.](#)

9. Please rank the proposed options in order of preference (A, B, C, D), where 1 is the most preferable. Select each option to move its position in the ranking.

A: No minimum positions in the bingo area

B: Minimum of 30 positions in the bingo area

C: Minimum of 40 positions in the bingo area

D: At least one distinct position for every 2.5 square metres of floor space in the bingo area up to 200 square metres in size, a minimum of 80 positions only. There should be a minimum of 30 positions for bingo in the bingo area, no matter how small the venue.

[See our response to Q9a.](#)

a. Please explain your ranking in the question above, providing supporting evidence where available. (Free text box)

[In the absence of an agreed player position definition we cannot be drawn on whether there should be a minimum number, nor what that number should be.](#)

10. In the government's view, a position is a space for a customer to play bingo while seated, which is recognisable as such, providing a surface for paper or electronic play of bingo. A distinct position would be a seat or wheelchair space where a single customer can play bingo unimpeded while seated. For example, a single table with four seats would count as four positions. We would not consider a seat primarily intended for use at a non-EBT gaming machine to be counted as a position for bingo.

Do you agree with this definition?

- Yes
- **No**
- Don't know

11. What other considerations would be important to note, when defining a position for bingo? (Free text box)

[The consultation suggests a narrow definition of a player position, limiting it to being a seated position at a table or other surface only. It does not consider bingo played](#)

on bingo only cabinet machines, nor does it futureproof it so that further innovation in bingo formats isn't curtailed.

We would welcome a bespoke session with the Government and other trade bodies to discuss the potential for defining a player position.

Should these discussions take place, we suggest that the following points might be taken into consideration, as a minimum:

- a) Permanent seating at tables/surfaces:
 - Should this include chairs and tables which can be folded up/stacked away in cupboards or flip down seats (or not)? Using temporary or infill seating could vary the number of player positions at any one time.
 - Should it be fixed to the floor or not (emergency escape implications)?
 - Implications for disabled access.

- b) Bingo only cabinet machines:
 - Whether there has to be stool in front of the cabinet or would someone standing in front of such machines count as a position (this doesn't apply to gaming machines). Do these stools have to be fixed to the floor (again, emergency escape implications)?
 - Implications for disabled access.

Any agreed definition (however unlikely) could either be incorporated into one or more of the following:

- LCCP 9.1.2.1 to further help define what constitutes "substantive facilities for non-remote bingo".
- The Gambling Commission's "How bingo is defined". This would allow the GC to adapt the requirements in line with developments and consumer preferences (rather than being fixed in legislation).
- Or the bingo and casino technical requirements (*These technical requirements will regulate bingo and casino equipment in two different situations:*
 - a. *equipment that is used on premises in Great Britain to provide casino games and bingo games to the public.....*).

Other features of the bingo area

12. Beyond proposals relating to percentage of floor space, the types of gaming machine permitted in the bingo area, and a minimum number of positions, are there any other conditions that should be applied to the bingo area?

- **Yes**
- No
- Don't know

a. Please explain your answer, providing supporting evidence where available. (Free text box)

Whilst not conditions, we would offer the following observations on two other matters:

1) More guidance for industry and LAs

As stated in Q11 we would welcome the opportunity to work with the Government and the rest of the industry on a definition for player position and more generally revisit, what is meant by “substantive facilities for non-remote bingo”.

LCCP 9.1.2.3 stipulates that *“licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.”*

Regulators should have been ensuring compliance with this requirement at application stage and/or enforcing it when inspecting premises.

However if the current drafting of LCCP 9.1.2.3 is not achieving the desired outcome then additions could include:

- The offer of bingo should feature substantively on signage on the front of the premises (irrespective of whether this is obvious from the name of the premises). The size of signage should not be defined as premises vary in size.
- Once inside the premises it should be overtly clear where a customer can play bingo e.g. a seating area or signage inside the premises making it clear where the bingo facilities (seating/tablets/bingo only cabinets etc) are located.

We are aware that licensing councillors (and some officers) are not familiar with the different formats for playing bingo. Paper games, bingo only tablets, bingo tablets with gaming content, bingo only cabinets; bingo variants such as Bingo Express and Bingo Plus and linked games are now typically found in bingo venues but not necessarily fully understood by LAs. An educative piece for LAs (alongside the suggested additional signage) could address any regulatory confusion.

2. Alcohol

The consultation makes reference to bingo premises and alcohol licences. However it is silent on how many premises with a bingo premises licence have indeed applied for an alcohol licence or what issues (or harm) have arisen in those premises that have an alcohol licence. It is also silent on what complaints have been raised.

Alcohol premises licences are issued by Licensing (Local) Authority under the Licensing Act 2003 (and Scottish equivalent). Any concerns about the sale of alcohol should be addressed via the Licensing Act 2003 (and Scottish equivalent) and not conflated with gambling legislation.

LAs have powers under the alcohol licensing to add conditions to alcohol premises licences, for example, to restrict sales of alcohol hours, limit what alcohol is sold and stipulate the presence of SIA door supervisors etc.

The Home Office s182 Licensing Act guidance (and Scottish equivalent) could be updated accordingly to remind LAs if there are concerns about alcohol licences in bingo premises.

Transitional arrangements

13. Please provide any views on the possible challenges, or practical considerations, do you anticipate during an implementation period for new requirements for bingo premises? Please explain your answer, providing supporting evidence where available. (Free text box)

We reiterate our view that we do not believe these proposals are proportionate or necessary and make the following observations on the time and cost implications if they were to progress.

Reconfiguration

- The timescales and costs to reconfigure a premises will be unique and will therefore vary by site. Additionally there could be implications for premises from a new fire risk assessment.
- Plans will need to be amended and resubmitted to the LA, with associated costs. One operator indicated an average price of £1500 per resubmitted plan.

Converting to an AGC.

- This will require both planning and licensing applications, opening up the potential for representations and/or refusals for one or both applications.
- Disproportionate costs associated with both applications, particularly if appeals are required. Depending on who is instructed, operator appeal costs could range between £25,000 - £40,000.
- What safeguards will be in place to prevent local authorities (planning and licensing authorities) from refusing what will be a Government imposed technical variation to meet the new legislative requirements on a long-standing premises licence?

Licensing application costs

- Commission Operator Licence costs range between £1,406 and £23,435 for a gaming machine general: whilst an AGC Operating Licence (OL) depends on GGY.
- The cost of adding a licensed activity is between £351 and £5,859.
- The maximum LA fees to vary a bingo licence is £1,750.
- Unless there is an “amnesty” or grandfather rights, it is likely that some LAs will receive representations potentially leading to more costly appeals (this also applies to planning).

Planning application costs and implications

- Bingo and AGC premises are in different sui generis classes, so a new change of use application is required as there is no variation process in planning.
- Fees are set in each country. In England they are linked to inflation. Planning fees in Wales increased from 1 December 2026.

Even if the licensing application is granted there is a chance that planning will be refused due to local policies:

- Restrictions in Council Local Development Plans or the supplementary planning guidance which sits underneath them (for example [Knowsley](#) has

restrictions on “all gambling uses” in certain areas; and other authorities may have specific restrictions on AGC use classes, which would prevent the change of use).

- Welsh planning policy brings in community well-being and social impacts into decision making, which may come into play when considering a change of use class.

14. How long, in months, would an appropriate implementation period need to be for the following groups: Existing licensed bingo premises and New Bingo premises (applying for a license in future)? (Free text box)

The timescales for existing premises which need to reconfigure will vary by site depending on the extent of changes required.

Timescales for existing premises that need to submit AGC planning and licensing applications will depend on what, if any representations are made, and potential appeals under the respective regulatory regimes. As a minimum an operator would be looking at:

Gambling Commission (information on GC website)

- Vary an OL – 8 weeks
- New OL – 16 weeks

Planning

- A change of use application is a minimum of 8 weeks for a positive decision. Appeals can add months to this process.

Gambling Licensing

- Determination of an uncontested application is within a minimum of 28 days, with the possibility of a longer period (which is not limited by the Gambling Act) should the application be opposed and a hearing is required. Longer timescales will apply if the hearing decision is appealed.

If the proposals were to go ahead, we suggest a minimum of **18 months** for existing premises from the date of implementation.

Given the Government’s Pride in Place commitment to introduce Cumulative Impact Assessments (CIAs), it is imperative that existing premises that would be required to vary their licence are not prevented from doing so by the existence of a CIA. The timing of these bingo proposals if they were to be progressed as drafted would need to dovetail appropriately with the plans to introduce CIAs.

a. Please explain your answer, providing supporting evidence where available. (Free text box) [See our response to Q14.](#)

15. Please provide an estimated one-off cost to licensing authorities to implement the proposed changes to the bingo licensing regime. Please explain your answer, providing supporting evidence where possible. (Free text box) [For Licensing Authorities to respond.](#)

16. Please provide any other views on the administrative burden associated with these proposals for licensing authorities. Please explain your answer, providing supporting evidence where available. (Free text box)

We know from our partnership working with the Institute of Licensing that LAs are concerned about the potential costs and calls on resources arising from more hearings and appeals.

The simpler the process is, the less onerous it will be on both industry and LAs. Any associated guidance for LAs would need to be produced well in advance of implementation (to avoid the issues the industry faced with the recent casino changes).

17. Please provide views on the enforceability of these proposals. Please explain your answer, providing supporting evidence where available. (Free text box)

The more straightforward any changes the easier it will be to enforce, with less inconsistency and confusion.

As stated in Q12 we have anecdotal information that some Local Authority Councillors' vision of bingo is the game historically played in traditional bingo halls with players sat at tables with paper games and dabbers.

They are not all aware that, with technology, bingo has evolved in many ways so that it can be played on bingo only tablets, tablets which have both bingo and gaming machine content, on bingo only cabinets and via linked games to name but a few formats.

Some tablets offering "bingo only" may need a member of staff to facilitate loading on money to the customer's account to enable play. Again we have anecdotal information that this can be interpreted by LAs as the tablets are "not turned on."

Some LAs are confused by linked bingo played across licensed premises, thinking that it is "remote bingo."

Irrespective of which proposals are progressed, more information for LAs on these points (whether through the Guidance to Licensing Authorities or other guidance) would help raise awareness of the evolution of bingo and assist with compliance and consistency of enforcement.

General

18. Do you anticipate the proposed changes to bingo licensing having particular impacts on gambling-related harm?

- Yes, they will increase gambling-related harm
- Yes, they will decrease gambling-related harm
- Yes, they will have a mixed impact on gambling-related harm
- **No**
- I don't know

There is no evidence or reference to 'harm' in the consultation document, and we are proposing that the changes do not go ahead in the format they have proposed anyway.

19. Are there any other impacts of the proposed changes to bingo licensing not covered by the questions above?

- **Yes**
- No
- I don't know

a. Please explain your answer, providing supporting evidence where available. (Free text box)

The consultation references potential confusion with sector self-exclusion schemes. This could be addressed via changes to the LCCP 3.5 thereby ensuring that anyone self-excluding from an AGC can also self-exclude from a licensed bingo premises.

The GBG is also aware of concerns made about bingo tablets with gaming machine content not always being available to customers, when they are a key element in the 80:20 ratio for gaming machine numbers. Each time this matter has mentioned to the GBG, we have asked whether it was reported to the Regulator at the time, and disappointingly the answer is always 'no'. Monitoring compliance with the current regulations around gaming machine numbers is a fundamental requirement of the local regulator. If operators are found in breach of their entitlement, then appropriate action should be taken by the Regulator, as with all instances of non-compliance with gambling regulations.

Questions for bingo operators

For licensed operators to respond to questions 20 -36 inclusive (so no comments from GBG until Q37).

20. How many licensed bingo premises do you operate? (Free text box)

Minimum floor space for the bingo area

21. Please provide information or evidence (e.g. floor plans) related to the venues you operate to show the proportion of floor space dedicated to:

- Areas occupied by facilities for bingo
- Areas occupied by gaming machines
- Areas occupied by other facilities

(Free text box)

a. Please upload any additional evidence, where applicable (File upload)

22. How many of your bingo premises would you need to adapt to meet the requirements in this consultation under each of four options being considered for the percentage of the total premises floor space that should be dedicated to the bingo area (A, B, C, D), if you did not convert any premises to adult gaming centres? Please state 'none' where you would not need to adapt any premises (Free text box)

23. Do you expect that you would convert any premises to adult gaming centre licences under these options?

- Yes
- No
- Don't know

24. How many premises do you expect that you would convert any premises to adult gaming centre licences under these options (A, B, C, D)? Please state 'None' where you do not expect to convert any premises. (Free text box)

25. What would be the main reasons for converting premises to adult gaming centre licences? (Free text box)

26. If you were to adapt all premises to meet the requirements related to the bingo area under Option B (30% of floor space dedicated to the 'bingo area'), what impact would this have on the below outcomes?

- GGY from bingo games,
- GGY from gaming machines,
- Number of gaming machines,
- Annual operating costs

(Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)

27. If you were to adapt all premises to meet the requirements related to the bingo area under Option C (40% of floor space dedicated to the 'bingo area'), what impact would this have on the below outcomes?

- GGY from bingo games,
- GGY from gaming machines,
- Number of gaming machines,
- Annual operating costs

(Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)

28. If you were to adapt all premises to meet the requirements related to the bingo area under Option D (50% of floor space dedicated to the 'bingo area'), what impact would this have on the below outcomes?

- GGY from bingo games,
- GGY from gaming machines,
- Number of gaming machines,
- Annual operating costs

(Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)

a. Please explain your answers (Q50, Q51, Q52), providing supporting evidence where available. (Free text box)

29. If, under the requirements of Option B, you were to convert all premises with less than 30% of floor space dedicated to bingo to adult gaming centres what impact would this have on the below outcomes?

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- Overall GGY,
- Number of gaming machines,
- annual operating costs (

Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)

30. If, under the requirements of Option C, you were to convert all premises with less than 40% of the floor space dedicated to bingo to adult gaming centres what impact would this have on the below outcomes?

- Overall GGY,
- Number of gaming machines,
- annual operating costs

(Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)

31. If, under the requirements of Option D, you were to convert all premises with less than 50% of floor space dedicated to adult gaming centres what impact would this have on the below outcomes?

- Overall GGY,
- Number of gaming machines,
- annual operating costs

(Significant increase / Slight increase / No change / Slight Decrease / Significant Decrease / Don't know)

a. Please explain your answers, (Q53, Q54, Q55) providing supporting evidence where available. (Free text box)

32. Please provide a monetary estimate of the approximate one-off cost required to adapt a premises you operate to meet the bingo area requirements under each of these options (B, C, D).

- B) 30% dedicated to the 'bingo area' (free text box)
- C) 40% dedicated to the 'bingo area' (free text box)
- D) 50% dedicated to the 'bingo area' (free text box)

a. Please provide supporting evidence where possible. (Free text box) b. Please upload any additional evidence, where applicable. (File upload)

33. If you operate at least one licensed bingo premises where floor space dedicated to an area for bingo is less than 50% of venue floor space, please provide an approximate breakdown of the key revenue streams for the premises (for example, bingo, gaming machine, food and beverage, alcohol sales). (Free text box)

a. Please upload any additional evidence where applicable. (File upload)

Gaming machines in the bingo area

34. If available, please provide a breakdown of the number of machines and gross gambling yield from gaming machines in your bingo premises, split by device (i.e. tablet vs in-fill/cabinet machines) and category of machine. (Free text box)

Positions in the bingo area

35. How would a requirement for a minimum number of bingo positions impact your premises? Please explain your answer, providing supporting evidence on factors such as gross gambling yield, operational factors, consumer experience, risk profiles, and impacts on gambling-related harm, where available. (Free text box)

a. Please upload any supporting evidence where applicable (File upload)

Final supporting evidence

36. 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. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. 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. (Free text box)

37. Please upload any further supporting evidence or any other information that should be considered as part of this consultation relating to the proposed changes and their possible impacts. (File upload)

The GBG believes that these proposals will result in disproportionate costs for operators, at a time when they are under a myriad of additional financial pressures. The transitional arrangements will also impose burdens on local authorities and the resultant changes are more likely to compound any alleged confusion over the premises.

This flies in the face of the Government's Growth Agenda and its commitment to reduce regulatory administrative costs.

As stated in our response, our Members suggest that the Government's aim of ensuring that land-based gambling premises having a licence appropriate to the offering in the premises can be achieved through some modest, less onerous and less costly changes.

- Use LCCP 9.1.2.1. and 9.1.2.3 to address facilities for bingo and presentation concerns; or via the How bingo is defined document or the bingo technical standards.
- Amend LCCP 3.5 to address self-exclusion concerns.
- Update Part 18 of the GLA and / or work with the three Local Government Associations (in Great Britain) and the Institute of Licensing to provide further information to LAs about the range of bingo formats.
- Work with the Home Office and Scottish Government to address any concerns about alcohol licences.

38. Is any of the information you have provided confidential, commercially sensitive or otherwise unsuitable for publication (including in anonymised)? If so, please indicate what. Free text box) [No comment.](#)