

## Response ID ANON-MVFQ-CPSD-4

Submitted to **Call for evidence: player protections on Category B gaming machines**  
Submitted on **2019-05-10 18:16:09**

### User information

#### 1 What is your name?

**Name:**

Peter Hannibal

#### 2 What is your email address?

**Email:**

peterhannibal@newgenleisure.com

#### 3 What is your organisation?

**Organisation:**

The Gambling Business Group

**4 As part of this call for evidence, we may decide to publish your name and organisation on our website to indicate that you have responded to this consultation. We have asked you to indicate your consent to the Commission publishing your name and organisation to indicate you have responded to this call for evidence.**

I CONSENT to the publication of my name and organisation to indicate I responded to this consultation

### Risk of harm

### Harm prevention

### Cost and risks

### Responding to the call for evidence

### National Strategy – Central Data Repository

#### 1 Select the questions you wish to respond to.

**Please select either: industry-specific or consumer-specific questions to respond to:**

Industry Specific Questions

### Industry Specific Questions

#### 1 How do you assure yourself that consumers gambling on Category B machines can do so safe from harm?

**How do you assure yourself that consumers gambling on Category B machines can do so safe from harm?:**

The Gambling Business Group is responding to this call for evidence in a constructive but generic capacity. The questions as set out in this portal are aimed towards operators, so we have left it to our operator members to respond to these directly. This submission takes a more holistic view with the intention of helping to inform the debate.

What we know is that operators use the following methods to manage their customers. Not all operators use all of the methods. However, all operators are aware that it is important for the long term sustainability of their business that their customers keep coming back and do not 'burn themselves out'. Therefore, effective KYC (Know Your Customer) practices are used to understand when someone is susceptible to problematic play. These are the methods used by operators in pursuit of KYC;

- Staff training, refresher training and customer care development in;
  - o Know your customer
  - o Identifying problem behaviours.
  - o Customer service
  - o Customer interactions
  - o Customer interventions
  - o Self-exclusion
- On-boarding – important training carried out from day 1 of employment.
- Know all regular customers (KYC)
- High levels of customer service necessitate regular and frequent interactions.
- Customer interventions – arm around the customer when needed.
- Self-exclusion.

- Machines always supervised – at times with enhanced CCTV.
- Literature and notifications on display to highlight the issue of problem gambling.
- All B3 products independently tested for compliance.
- Trade association membership includes requirement to remain compliant with the Gambling Act at all times.

## 2 Have you trialled and evaluated the effectiveness of specific customer protections?

Yes

### What were the results? :

- PlayRight mobile device app (currently being rolled out in some venues)
- Social Responsibility messaging as per the Bingo Association project.
- IHL's SmartHUB for managing and recording incidents and interactions.

## 3 Please provide an estimate of the timescales and costs for implementing the following:

### Implementing player alerts (where customer's can set their own time and spend limit and both customers and staff receive a notification when this is met) and/or hard stops (where gaming session ends when limits are triggered) across B1 and B3 machines :

- The Gambling Business Group(GBG) is bringing together the learnings from the player alerts, limit setting and messaging from the work done by the ABB with their B2 products. The intention is to create a set of industry guidelines for all Cat B products. These guidelines will be drafted & agreed in the coming weeks with a view to starting the software development process in the second half of 2019.
- With server based connected products, it is expected that a full roll out could be achieved within two years. This timescale is only relevant to those Cat B technologies that are capable of being adapted/updated with software alone. Others will take longer.
- The Gambling Commission need to be mindful as to how many Cat B machines there are sited that will not be capable of hosting such functionality. These products will take a number of years to be phased out.

### Rolling out tracked play across your existing category B estate. Note: we would expect costings to allow for depreciation and eventual replacement of existing machines :

Whilst we have engaged with the Gambling Commission in this regard, there is still some ambiguity in what is meant by 'tracked play';

- Sessional play information is already available on many Cat B products including those with the latest version of the GBG TITO protocol – where implemented.
- Is the Gambling Commission's theory for Tracked Play;
  - o For the player to be identified?
  - o For sessions to be linked in a venue?
  - o For sessions to be linked across operator's venues?
  - o For sessions to be linked between venues?
  - o For off line and online sessions to be linked?
- Depreciation has nothing to do with the replacement of machines. Machines are only ever replaced when they are no longer earning their place in a venue. The Gambling Commission need to understand that machines are replaced when they stop contributing to the overall performance of the venue, not when they get old.
- There are a number of costs to consider with the suggestion that 'tracked play' should be rolled out;
  - o Cost for the machines/terminals to be adapted.
  - o Cost for a back office system to manage the linking of sessions.
  - o Machine network costs.
  - o Player recruitment admin costs.
  - o Revenue decline from players walking away. For example, a 20% fall off in machine revenue will force the closure of many marginal bingo clubs and AGCs. And will force the closure of even more LBOs.
  - o What cost to the exchequer for the loss of tax revenues?
  - o What cost to society for the lost jobs in the venues forced to close?
  - o What cost to the high streets that are already suffering from consumer behavioural change?
- The questions currently being asked by the Gambling Commission are far too ambiguous to be able to evaluate the impact with any accuracy or to even provide a concise answer.

### Implementing any alternative, but equally effective, means for detecting and mitigating harmful play. When will these be put in place? :

There are a number of things that could be considered as integral components in a road map to protecting vulnerable players some of which are listed below. However, it should be noted that the industry trade bodies collectively made an open and constructive offer to work with the Gambling Commission in Feb 2018 - over a year ago, via a working group made up of all relevant sector representation and the GC itself. Had this offer been accepted, we would be much further along the road map today. Instead, the Gambling Commission has chosen to ignore this offer in favour of this call for evidence.

It is acknowledged that not all operators use all of the KYC methods, so there is an opportunity to create a set of guidelines or standards;

- Implement a minimum standards for KYC
- Potential for implementing session statements at the end of play. I
- Additional pop ups such as; you have been playing for 20 mins and have won £12 in that time
- Roll out digital compliance tools to improve and record interactions and KYC – effectively turning all of the tacit knowledge into recorded information for evaluation.
- Roll out player e-wallets across all Cat B machines with all of the inherent responsible gambling measures over the next 3 years.

## 4 If you have further observations/questions regarding the content of this call for evidence, please detail these below.

**If you have further observations/questions regarding the content of this call for evidence, please detail these below.:**

We are not aware that there is any evidence that proves 'tracked play' reduces gambling related harm. If the Gambling Commission has evidence to support the position they appear to have taken with this, then it should be publicised to support this document. What is being suggested will have a huge impact upon all things related to gaming machines including jobs, livelihoods and tax revenues.

A far better approach would be to produce a progressive plan that ensures effective KYC that is deployed across all Cat B machine play.

The industry has offered to work with the Gambling Commission in pursuit of this goal, but to date this has not been reciprocated.

We all have an obligation to protect the vulnerable. We also have an obligation to allow the consumer the freedom to make choices. Mandating 'tracked play' fulfils neither of these obligations.

## **5 Which part do you wish to respond to?**

**Please select an option of where to go next:**

I have completed this section have and now finished

## **Before you submit your response**

### **1 How did you hear about this consultation?**

Word of mouth

**If you answered other, please specify:**

### **2 Overall, how satisfied were you with our online consultation tool?**

Disappointed

**How could we improve this service? :**

Make it appropriate for all types of stakeholders to respond to.