

REVIEW OF GAMING MACHINES AND SOCIAL RESPONSIBILITY MEASURES

CALL FOR EVIDENCE

NB LEISURE LIMITED

NB Leisure Limited, 722 Cumbernauld Road, GLASGOW G33 2ES (Company Number SC160764) are an independent Bingo Hall operator. Neil Charity is the sole director. They are licensed to provide facilities for playing bingo by virtue of an Operating Licence issued by the Gambling Commission (reference – 2352). The company has been trading since 1989 and currently operates two Bingo Halls in the Glasgow and West Lothian Licensing Board areas respectively. Each of these premises are licensed by the respective licensing board for the sale of alcohol and for gambling.

These premises have operated without issue.

NB Leisure are of the view that these Bingo Halls play an important role in the local community by bringing together diverse elements of the community to engage in a safe and enjoyable pastime.

With particular reference to the questions contained within the Consultation, we should like to respond as follows.

1. What, if any, changes in maximum stakes and/or prizes across the different categories of gaming machines support the Governments objectives set out in a document? Please provide evidence to support this position?

NB Leisure are of the view that the current maximum stake/prizes are sensible and fit for purpose. However, it is important to note that NB Leisure are focused upon being a bingo hall. The machines operating in their premises are ancillary to the wider bingo offer. Customers primarily attend the premises in order to participate in bingo. When the government is considering evidence submitted, NB Leisure would ask that they have regard to the fact that machines are utilised in a range of premises, including bingo halls, where they are ancillary to the wider operation.

There has been a decrease in the machines operated by NB Leisure across the estate over the past few years as the premises tries to focuses on their bingo offer and also restricting their machine offer to a few key machines.

2. To what extent have industry measures of gaming machines mitigated harm or improved play or protections and mitigated harm to consumers and communities? Please provide evidence to support this position.

NB Leisure would respectfully submit many of the industry measures that have been introduced mirror the existing good practice that the operator had put in place in any case.

However, NB Leisure does have a concern that certain measures are overly prescriptive. For example, in the event of a customer making management aware that he/she had a problem with the use of machines then NB Leisure would work with that customer to prevent him/her using the machines. With the event of the self-exclusion scheme, NB Leisure are of the view that it is too prescriptive. When a customer is told that self-exclusion will prevent access to not only the premises but any other bingo hall who is part of the scheme, the customer will often change their mind as they wish to continue with playing bingo. Therefore, NB Leisure are not able to tailor a solution to the needs of the customer.

3. What other factors should Government be considering to ensure the correct balance in gaming machine regulation? Please provide evidence to support this position.

NB Leisure are of the view that it would be beneficial for a working party to be set up that would bring together the entire industry with representatives not only from the larger operators but also representatives from the independent operators. It is submitted that this is important as various stakeholders will experience different challenges and their views will prove useful.

NB Leisure suggests that attention is paid to the primary purpose of a premises. As submitted in response to Q1 the machines offered at NB Leisure's premises are ancillary to the bingo. It may be that other bingo type premises artificially inflate the number of machines so to benefit from a high number of category B3 and B4 machines.

4. What, if any, changes in the number and location of current gaming machine allocations support the Government's objective set out in this document? Please provide evidence to support this position.

NB Leisure submits that there is no change needed to the gaming machine allocations in respect of Bingo Halls. NB Leisure does have a concern that there is a failure by stakeholders to recognise and respect that bingo operators benefit from a limited offer of machines and are not able to offer B1 machines. For the avoidance of doubt, the issues that are, rightly or wrongly, associated with B1 machines do not relate to bingo operators. As such, when considering any evidence, NB Leisure would call on the government to identify the causal link between the harm and the type of machine/gambling involved.

5. What has been the impact of social responsibility measures since 2013? Especially on vulnerable consumers in communities with high level deprivation?

As noted above, NB Leisure are of the view that it operates to a high standard and in fact schemes such as self-regulation have resulted in some of the operator's discretion being lost.

In recognition of its social responsibilities, NB Leisure have engaged in various exercises to make sure that it operates in accordance with the objectives. For example, The Bingo Association carries out age verification tests and also customer service checks and reports the outcome to NB Leisure.

6. Is there anything further that should be considered to improve social responsibility measures across the industry?

NB Leisure are of the view that an increased presence from Gambling Commission compliance officers would be beneficial to the trade. This "hands on" approach would help flag any issues and also allow operators to have confidence that all premises are operating on a level playing level.

Consideration should also be given to amending the legislation to allow Scottish licensing boards to take enforcement action. This would assist in driving up standards in the industry.

7. Is there any evidence on whether existing rules on gambling advertising are appropriate to protect children and vulnerable people from the possible harmful impact of gambling advertising?

NB Leisure does not possess any evidence in relation to advertising. However, it would submit that it is an important mechanism in attracting new players to a well regulated form of entertainment.

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