

Consultation on Category D gaming machines and licensing for bingo premises

This consultation closes at
11:59pm on 30 January 2026

Consultation questions

Respondent type

1. Are you responding on behalf of an organisation or as an individual? (Individual / Organisation / Other [please specify])

Organisation

If individual

2. What is your age?

N/A

3. What part of Great Britain do you live in?

N/A

4. Which of the following best describes your interest in gambling policy (select up to two options)?

N/A

5. Is any of the information you have provided confidential, commercially sensitive or otherwise unsuitable for publication (including in anonymised)?

N/A

If organisation

6. What is the name of your organisation? (Free text box)

Institute of Licensing

7. Is the organisation headquartered in Great Britain?

Yes

8. Which of the following best represents your organisation's sector? (Licenced bingo operator, Licenced AGC operator, Licenced FEC operator, Unlicensed FEC operator, Other gambling operator, Gambling-related sector (e.g. advertising, sport, or broadcasting),

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Government/regulator, Lived experience peer support charity, Academic/research, Treatment provision, Other (please specify), I don't know)

Professional body for licensing practitioners across the UK, including regulators, industry and private practice.

9. How many employees does your organisation have globally?

10 - 19

10. Are you happy for the Government to attribute responses to your organisation in a published response to this consultation? (Yes / No)

Yes

11. 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

Category D gaming machines section

Crane grab machines

Blurb: The Government is proposing to maintain the maximum stake for crane grab machines at £1 and increase the maximum prize for crane grab machines from £50 to £75.

1. Should the stake limit on crane grab machines be maintained at £1? (Yes / No, the stake limit should be lower than £1 / No, the stake limit should be higher than £1 / I don't know)

Don't know

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

No comments on stakes and prizes which are commercial aspects.

2. Should the prize limit on crane grab machines be increased from £50 to £75? (Yes / No, the prize limit should be lower than £75 / No, the prize limit should be higher than £75 /

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I don't know) Please explain your answer, providing any supporting evidence where available. (Free text box)

No comments on stakes and prizes which are commercial aspects.

Non-money prize (other than crane grab machines) Slot-style non-money machines

3. Should the existing non-money Category D (other than crane grab machine) category be subdivided to create a new category of non-money 'slot-style' machines? (Yes / No / Don't know)

NO

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

There are already 5 sub-categories of Category D machines. We are concerned that further sub-categories will add unnecessary complication, and we have not seen any evidence that the additional category is necessary to address evidenced harm. Adding more categories will increase the regulatory burden on already under resourced Licensing Authorities.

4. If this new category is created, should stakes and prizes for non-money slot-style machines be maintained at 30p and £8, respectively? (Yes / No, stakes and prizes should be set at a lower level / No, stakes and prizes should be set at a higher level / No, stakes and limits should change in another way / Don't know)
- a. Please explain your answer, providing any supporting evidence where available. (Free text box)

We do not believe that an additional sub-category of Category D machines is necessary.

The definition the government is proposing for slot-style machines is based on the definition of a reel-based game, and is similar to the definition used for online slot games. A reel-based game in this context would refer to: games where moving or changing images or text are displayed by the use of reels, visual representations of reels or other means, and an individual may win a prize or other opportunity or advantage, as represented by the resulting arrangement of those images or text.

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5. Should slot-style machines be defined as machines that are reel-based, according to the definition provided above? (Yes / No / Don't know)

Yes

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

As above, we do not consider this additional category to be necessary, but if the proposal is to go ahead, then the definition as set out would seem to be appropriate.

6. Does the definition proposed adequately capture all forms of physical 'slot-style' Category D machines, including older mechanical ones? (Yes / No / Don't know)

Don't know

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

No Comment

7. Are there other types of non-money prize machines or gameplay mechanics, beyond those that might be defined as 'reel-based', that you believe the Government should not consider an increase in stakes and prizes for due to their visual appearance, gameplay, or psychological characteristics? (optional)

No comments on stakes and prizes which are commercial aspects.

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

No Comment

Non-slot style machines

8. Which approach do you think should be taken in relation to non-slot style, non-money machines stake and prize limits? (A) Remain at a maximum stake of 30p, and a maximum prize of £8, / (B) Increase to a maximum stake of 40p, and a maximum prize of £15, (C) / Increase to a maximum stake of 50p, and a maximum prize of £20 / (D) Change in another way /

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Don't know

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

No comments on stakes and prizes which are commercial aspects.

9. If you have any views on how the government's proposal to increase stake and prize limits on non-money prize machines could support the FEC sector, providing any supporting evidence where available? (Free text box)

No Comment

10. If you have any views on how the government's proposal to increase stake and prize limits on non-money prize machines could have unintended adverse consequences, please provide them here, along with any supporting evidence where available. (Free text box)

No comments on stakes and prizes which are commercial aspects.

11. If you have any views about the impact of an increase in stakes and prizes not considered above, please provide them here. We particularly welcome evidence on the estimated impacts of the options on gross gambling yield (GGY), investment and jobs, gambling-related harm, participation by children and young people, to support options assessment. (Free text box)

No comments on stakes and prizes which are commercial aspects.

Coin pushers and penny falls

Blurb: Currently, there are two types of pusher-style machines: Pusher-style machines that pay out in Non-money prizes. Maximum stake of 30p and maximum prize of £8 (non-money). These machines are currently categorised as non-money prize machines.

Coin pusher machines that pay out in money and non-money prizes. Maximum stake of 20p and maximum prize of £20 (of which no more than £10 can be a money prize)

12. Should a new category of machine, 'pushers', be created which combines pusher-style machines that pay out in non-money prizes with combined money and non-money prize coin pushers? (Yes / No / Don't know)

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No

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

No. As already stated – there are already 5 sub-categories of Category D machines. We are concerned that further sub-categories will add unnecessary complication, and we have not seen any evidence that the additional category is necessary to address evidenced harm. Adding more categories will increase the regulatory burden on already under resourced Licensing Authorities.

13. Are there technical and cost implications associated with introducing a unified ‘pusher’ category? (Yes / No / Don’t know)

Yes

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

As previously mentioned, there are already 5 sub-categories of Category D machines. We are concerned that further sub-categories will add unnecessary complication and we have not seen any evidence that the additional category is necessary to address evidenced harm. Adding more categories will increase the regulatory burden (both from a technical and cost point of view) on already under resourced Licensing Authorities.

14. Should the stake limit for unified ‘pushers’ be set at 30p, in line with the current stake limit for pusher machines that pay out in tickets? (Yes / No, the stake limit should be lower / No, the stake limit should be higher / No, the stake limit should change in another way / Don’t know)

Don’t know

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

No comments on stakes and prizes which are commercial aspects.

15. Should the maximum prize for unified ‘pushers’ be set at a £20 maximum prize (of which no more than £12 can be a money prize)? (Yes / No, the prize limit should be lower / No,

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the prize limit should be higher / No, the prize limit should change in another way / Don't know)

[Don't know](#)

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

[No comments on stakes and prizes which are commercial aspects.](#)

16. If you have any views on how the government's proposal to increase stake and prize limits on pusher machines could support the FEC sector, please provide them here, along with any supporting evidence where available. (Free text box)

[No comments on stakes and prizes which are commercial aspects.](#)

17. If you have any views on how the government's proposal to increase stake and prize limits on pusher machines could have unintended adverse consequences, please provide them here, along with any supporting evidence where available. (Free text box)

[No comments on stakes and prizes which are commercial aspects.](#)

[Combined money and non-money prize machines \(other than coin pusher or penny falls machines\)](#)

18. Should any changes be made to stake and prize limits for combined money and non-money prize machines? (Yes, stake and prize limits for combined money and non-money prize machines should be lower / Yes, stake and prize limits for combined money and non-money prize machines should be higher / Yes, stake and prize limits for combined money and non-money prize machines should be changed in another way / No / Don't know)

[Don't know](#)

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

[No comments on stakes and prizes which are commercial aspects.](#)

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General - stakes and prizes

19. What is the estimated impact of the package of proposals on Gross Gambling Yield in the family entertainment centre (FEC) sector? (Significant increase/ Slight increase/ No change/ Slight decrease/ Significant decrease, Don't know)

Don't know

- a. Please explain your answer, providing an estimated GGY impact in £ where possible. (Free text box)

No comments on these matters which are commercial aspects.

20. What is the estimated impact of the package of proposals on investment in the FEC sector? (Significant increase/ Slight increase/ No change/ Slight decrease/ Significant decrease, Don't know)

Don't know

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

No comments on these matters which are commercial aspects.

21. What is the estimated impact of the package of proposals on jobs in the FEC sector? (Significant increase/ slight increase/ no change/ slight decrease/ Significant decrease, Don't know)

Don't know

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

No comments on these matters which are operational aspects.

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22. What is the estimated impact on gambling-related harm in the FEC sector? (Significant increase/ slight increase/ no change/ slight decrease/ Significant decrease, Don't know)

Don't know

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

No comments on these matters which are operational aspects.

23. What is the estimated impact on participation by children and young people in the FEC sector? (Significant increase/ Slight increase/ No change/ Slight decrease/ Significant decrease, Don't know)

Don't know

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

No comments on these matters which are operational aspects.

24. Are there any other impacts of the proposed changes to Category D gaming machines not covered by the questions above? (Free text box)

No additional comments

Introduction of an age limit on 'cash-out' Category D slot-style machines (all optional)

25. Does anything in this consultation affect your view on the Government's previously announced proposal to make it an offence for a person to invite, cause or permit a child or young person to use 'cash-out' Category D slot-style gaming machines? (Yes / No / Don't know)

No

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

The IoL had not previously formulated an official view on this proposal.

26. Are there any other factors, outside of the content of this consultation, that affect your view on the Government's proposal to make it an offence for a person to invite, cause or permit a child or young person to use 'cash-out' Category D slot-style gaming machines? (Yes / No / Don't know)

Yes

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

There is currently a voluntary agreement in place within the industry which has been in place for some time now, and we have not seen any evidence that these voluntary controls are failing.

In addition, we are concerned that there is no evidence of harm to children from reel-type Category D machines, and the Young People and Gambling Survey data cited in the consultation does not specifically support this proposal, referring to 21% of surveyed children 'playing arcade gaming machines such as penny pusher or claw grab machines'.

The survey report indicates that '...the primary motivation for gambling among young people is that they find it 'fun', cited by 78 percent of those who have used their own money to gamble in the last 12 months...' which supports the use of penny pusher and claw grab machines, rather than reel-type machines.

We consider that the proposal would move voluntary arrangements into a mandatory, enforceable framework, creating a criminal offence, and a danger of a two-tier regulatory system depending on the premises. As proposed, gambling licensed premises are caught by the proposals, while gaming machines in alcohol licensed premises, unlicensed FECs and members' club would not be. Additionally, there is concern that an unintended consequence may be to deter unlicensed FECs from operating reel-type Category D machines.

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The proposal risks significant confusion for operators and regulators, representing an increased regulatory burden and enforcement challenges with no apparent evidence to show that this is necessary to address harm.

27. Does anything in this consultation, or any other factor, affect your view on the proposal not to require 'cash-out' Category D slot-style machines be moved to age-restricted areas in venues? (Yes / No / Don't know)

Don't know

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

As above, we have several concerns about these proposals.

28. Do you have any views on the measures venues should adopt to ensure that no under-18s play on cash-out Category D slot-style machines if the age limit is introduced? (Yes / No / Don't know)

Yes

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

The industry's voluntary agreement means that most premises will already have supervisory arrangements in place. Moving this to a legislative framework will require such arrangements to be reviewed to ensure that compliance checks can be satisfied. It is likely that this will lead to confusion and conflict between industry and regulators. Moreover, there is evidence that children play category D machines for fun and not money - implementation of mandatory age restriction could be seen as excessive regulation.

Questions for FEC operators **NOT APPLICABLE TO THE IOL**

29. Please provide data on the number of Category D machines in your premises, broken down by sub-category. (Table by sub-category)

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

30. Please provide the latest data on Gross Gaming Yield (GGY) for Category D machines in your premises in the 2024/25 financial year, including any breakdowns by machine sub-

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category. If possible, please provide historical data, indicating trends over the past three years or more. (Table by subcategory)

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

31. Please provide any available data on current stakes and prizes in operation on Category D machines in your premises, by subcategory or type of machine. (Table by subcategory)

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

32. Please provide any available data or other information you collect related to player behaviour (such as average net expenditure and session length) on Category D machines in your premises, by subcategory or type of machine. (Table by subcategory)

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

33. Please provide any available data or other information you collect related to the effectiveness of responsible gambling measures on Category D machines in your premises, by subcategory or type of machine. (Table by subcategory)

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

34. Please provide any available data or other information you collect related to the proportion of players using 'cash-out' Category D slot-style machines that are under 18 on Category D machines in your premises.

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

Bingo licensing section

The Bingo Area

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

No

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

Licensing and regulation exist to address harms. We would question whether there is any evidence of harm currently that the proposed changes would address.

The consultation notes that ‘many licensed bingo premises are largely taken up by gaming machines and are difficult to distinguish from adult gaming centres...’ The rationale for the proposals is that the government wants to ensure that all land-based gambling premises have a licence type that is appropriate to the offering in their premises. LCCP requirements are also cited, and it is noted that Social Responsibility Code 9.1.2 concerns Bingo Premises and requires:

1. Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
2. Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
3. 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.

We would agree that condition 1 above is a subjective condition requiring individual judgement on what constitutes ‘substantive’ but we suggest that condition 3 carries an overriding requirement that premises licensed for bingo, must be recognisable as such. These conditions should be effectively enforced to ensure compliance, which would in turn negate the need for the proposed changes.

We consider that there is a risk that the proposals will reintroduce the need to ‘spilt’ premises with barriers and internal division arrangements, complex floor-space calculations and layouts. This was a feature in the early days of the Gambling Act 2005 due to the restrictions on the number and type of machines. The division of premises in this way was a substantial compliance and enforcement issue, confusing, frustrating and resource-intensive for both regulators and businesses.

In summary, measures are already in place and the most effective way to address any concern would be to review those provisions, tighten definitions and provide clarity about the requirements through additional guidance.

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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.

[We do not support a minimum floor space requirement.](#)

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

[We do not support a minimum floor space requirement.](#) As set out in our response to question 1, we consider that there is a risk that the proposals will require complex floor-space calculations and layouts, presenting a substantial compliance and enforcement issue, confusing, frustrating and resource-intensive for both licensing authorities and businesses.

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)

[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)

[We have not seen any evidence that enables us to comment on this proposal.](#) We would reiterate the preference for reliance on the LCCP requirements that the premises is clearly identifiable as bingo premises.

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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)

Yes

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

This would support the general principle that the premises are a bingo licensed premises. This would not negate other games from also being offered on tablets, but customers should be able to reasonably expect to be able to play bingo on tablets within the premises.

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)

No, there should not be a minimum distance

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

Refer to Q1 answer. Minimum distances will present different challenges for different premises and fails to take into account premises layouts etc. We refer to our answer to Q1 and question the need for this additional layer of regulation which will only lead to more complexity, alongside potential confusion and additional burdens for industry and regulators. This has been an issue in the past regarding 'adequate separation' between AGCs and uFECs. If this proposal is accepted, it will lead to the same inconsistencies and issues as seen previously.

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)

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Minimum distances will present different challenges for different premises and fails to take into account premises layouts etc. We refer to our answer to Q3 and question the need for this additional layer of regulation which will only lead to more complexity, alongside potential confusion and additional burdens for industry and regulators.

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)

[Yes we agree with Option A](#)

- 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)

[This offers flexibility for customers and for the premises management. Without evidence to show that this is a cause for concern or that there is a harm to be addressed by restricted tablet content, there appears to be no justification for more stringent restrictions.](#)

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

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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)

No

- 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. (Free text box)

Requiring a minimum number of positions may be unachievable for some premises. The overriding requirement should be that the premises is recognisable and operated as a Bingo premises – this is already in place under the Social Responsibility Code 9.1.2

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.

A: No minimum positions in the bingo area

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

Requiring a minimum number of positions may be unachievable for some premises. The overriding requirement should be that the premises is recognisable and operated as a Bingo premises – this is already in place under the Social Responsibility Code 9.1.2.

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

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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)

[Don't know](#)

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

[We do not support the need for this definition as we consider that there is no justification for any requirements for a minimum number of player positions.](#)

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)

[No](#)

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

[As previously stated, we are concerned that proposals in relation to floor space percentages, distance measures, restrictions on location of machines and minimum position numbers will be practically unachievable for some premises, and in all cases risk reintroducing the need to 'spilt' premises with barriers and internal division arrangements, complex floor-space calculations and layouts. This was a feature in the early days of the Gambling Act 2005 due to the restrictions on the number and type of machines. The division of premises in this way was a substantial compliance and enforcement issue, confusing, frustrating and resource-intensive for both regulators and businesses.](#)

[In summary, measures are already in place through the LCCP requirements that premises must be clearly distinguishable as bingo premises, and the most effective way to address any concern would be to review those provisions, tighten definitions and provide clarity about the requirements through additional guidance.](#)

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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)

The challenges of transitioning to comply with any new proposals will depend on the extent of the proposals taken forward into legislation.

It will be essential that changes requiring any significant alteration to internal layouts, or proposals which may lead to operators considering changing the premises licence (for example from a bingo premises to an AGC), are given an appropriate time frame. In any cases where the new proposals prompt operators to switch to a different premises licence type, planning permission is also likely to be required as a change of use class. In total this could result in operators being required to change their operating licence, premises licence and planning use class. In some cases, this may result in appeals which will make the process more protracted and expensive.

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)

We consider that if these proposals are brought forward, a minimum of 12 months should be allowed for implementation.

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

It will be essential that changes requiring any significant alteration to internal layouts, or proposals which may lead to operators considering changing their operating licence and premises licence (for example from a bingo premises to an AGC), are given an appropriate time frame. In cases where new proposals prompt operators to switch to a different premises licence type, planning permission is also likely to be required as a change of use class. In some cases, this may result in appeals which will make the process more protracted and expensive.

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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)

One off costs will involve staff and councillor training and preparation for the new requirements. There will be a need to consult with licence holders and to provide information and advice to assist them in assessing what changes will be needed to ensure compliance.

Premises licence applications will need to be processed, and any contested applications will require a hearing to determine the application. There is a right of appeal, so contested applications which are restricted or refused may well be subject to the appeal process. This will cause additional delay and expense in processing the relevant applications.

Application fees (variation and new premises licence applications) will offset the costs of administering uncontested applications, but it will not be enough to offset all costs, particularly in relation to hearings, appeals, premises inspections, mediation etc.

Anecdotally and as a broad guide, we understand the costs of hearings have been estimated by some of our licensing authority members at around £1,000.

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 consider that there are likely to be representations made if new AGC premises licences have to be applied for. The cost of the administration of hearings is significant both financial and time wise. A recent estimate of hearing costs in licensing applications produced the following:

1. £1,800 to £2,400 for a “typical” hearing in a mid-sized local authority, under moderate complexity.
2. For simple hearings (few representations, short duration, minimal legal involvement) £1,000 £1,500.

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3. For more complex or larger scale hearings (multiple parties, legal counsel, several days) £2,500 to £5,000 or more.

Fees for appeals in a magistrates' court may range from £10,000 to £40,000.

The consultation takes no account of additional costs and delays which may be incurred by both licensing authorities and industry, including:

- Mediation
- Licensing hearings and appeals
- Planning applications, hearings and appeals.

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

As set out in our response to the consultation questions, we are concerned that the proposals risk unnecessarily over complicating an already complex regulatory regime. While we accept that there is a need for gambling to be effectively regulated, and for vulnerable groups to be protected, an over complicated regime does not support this.

We are not aware of any evidence to show the harms that these proposals seek to address, and in the absence of any evidence, we question why the proposals are necessary.

The concerns in relation to Cat D machines relate primarily to the proposal to impose age restrictions on some of the machines, as well as adding additional sub-categories of machines. The age restrictions are considered unnecessary given the voluntary agreement already in place and without evidence to show that the voluntary agreement is failing. Mandating age limits in legislation will move voluntary arrangements into a **mandatory, enforceable framework**, creating a **criminal offence**. This is likely to create confusion, and potentially may lead to unlicensed FECs being forced to transition to licensed FECs, new arrangements within premises to segregate machines to demonstrate supervision, and overall, for the Category D machines to become more aligned with the higher stake and prize Category C machines.

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With regard to Bingo premises, we are concerned that the proposals will be unnecessarily disruptive and complex, requiring premises to undertake structural and internal alterations and to demonstrate arbitrary percentage or separation requirements with no apparent evidence of harms to be addressed. The social responsibility requirements of the Gambling Commission LCCP should take precedence (the premises must be clearly recognisable as a bingo premises) and the requirement for 'substantive facilities for non-remote bingo' could be reviewed, more clearly defined and supported by additional guidance.

We are concerned that the proposals will place additional and unnecessary burdens on already under-resourced licensing authorities without any evidence to justify the measures.

We are also concerned that there are unintended consequences for bingo premises which may struggle to comply with percentage or distance requirements and may consider transitioning to AGCs as a result.

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)

No

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

As outlined in our response above, we anticipate that the proposed changes will serve to further complicate an already complex regulatory regime. This is likely to lead to confusion which in turn will make compliance and enforcement more costly and difficult and potentially force operators to change the premises type.

A more complex regime serves no practical purpose, will not address alleged harms and will incur unnecessary costs for all parties.

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)

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

Overall, these proposals risk adversely impacting on the provision of bingo in small premises which may be forced to transition to gambling machine premises (AGCs). This is unlikely to be the outcome the government is hoping for.

Questions for bingo operators – NOT APPLICABLE TO THE IOL

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)

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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? 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

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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

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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)
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)