



An assessment of the changes to regulation of B1 gaming machines in casinos announced in the 2023 Gambling White Paper and implemented in 2025

A report for the Campaign for Fairer Gambling by Howard Reed (Director, Landman Economics)

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1 Introduction

This report assesses the UK Government’s recent decision to change the regulations regarding B1 gaming machines in casinos in Great Britain. A Statutory instrument (SI) – the Casinos (Gaming Machines and Mandatory Conditions) Regulations 2025 (UK Government, 2025) is currently passing through the UK Parliament and if approved, it will come into effect on 22 July 2025. The SI will set a maximum permitted ratio of Category B1 gaming machines¹ to gaming tables of 5:1 for all casinos; currently, only the three casinos designated as “Large Casinos” in the 2005 Gambling Act have a ratio this high. For the other more than 100 casinos in Great Britain, the SI allows an increase in the number of gaming machines. According to statistics from the Gambling Commission (2025) there are currently just over 3,000 B1 machines in Britain, all based in casinos.

The structure of this report is as follows. Section 2 explains the background to the current (2025) reforms to the regulation of casinos and B1 gaming machines. Sections 3 and 4 look in detail at a number of issues regarding the Impact Assessment (IA) of the reforms to casino machine gaming regulations. Section 3 focuses on the three justifications for intervention cited in the introduction to the IA, while Section 4 looks at other problems with the IA. Section 5 assesses the Regulatory Policy Committee (RPC)’s review of the Impact Assessment. Section 6 looks at the apparent influence of the Betting and Gaming Council (BGC) on formulation of the Government’s policies on casino machine regulation. Section 7 offers conclusions.

¹ Category B1 gaming machines have a maximum stake of £5 per play and a maximum prize of £10,000. Unlike other types of category B machine (which have a maximum stake of £2 per play and a maximum prize of £500), B1 machines are only legally permitted in casinos. See <https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/appendix-b-summary-of-gaming-machine-categories-and-entitlements> for more details.

2 Background

2.1 Existing regulatory framework

The 2005 Gambling Act established a three-tier regulatory framework for casinos in Great Britain:

1. Casinos regulated under the 1968 Gambling Act
2. A new category of Small casinos
3. A new category of Large casinos.

The 2005 Act provided for a maximum of 8 Small casino licences and 8 Large casino licences. Prior to the Covid-19 pandemic, there were a total of 4 Large casinos and 4 Small casinos in operation. Post-Covid, one Large casino and 3 Small casinos have closed, leaving only 3 Large casinos and one Small casino currently in operation (plus more than 100 other casino venues regulated under the 1968 Act).

Table 2.1 shows the current situation regarding casino licences (reproduced and updated from Figure 21 in the 2023 Gambling White Paper).

Table 2.1. Current rules regarding casino licences (maximum number of Category B1 machines, machine/table ratio and space restrictions) as of June 2025

Current rules on casinos	1968 Act	2005 Act (Small)	2005 Act (Large)
Number of venues (2025)	137 active licences	1 (8 licences available, 3 previously open but now closed)	3 (8 licences available)
Maximum number of B1 machines (£5 stake, £10,000 prize limit)	20	80	150
Machine/table ratio	None	2:1	5:1
Space restrictions:			
Gambling area	None	500-1,500m ²	1,500-3,500m ²
Table gaming	N/A	500m ²	1,000m ²
Non-gambling	10% if 200m ²	250m ²	500m ²

Source: UK Government (2023), with number of venues updated to take account of recent casino closures.

2.2 DCMS Review of the Gambling Act 2005

In December 2020 the Department for Culture, Media and Sport (DCMS) announced a review of the Gambling Act 2005 (DCMS, 2021). The announcement of the review stated that “this review seeks to ensure that people can continue to gamble but that the legislation and regulation we have in place addresses as many factors as possible to give the necessary safeguards to protect children, vulnerable people and all gamblers in the digital age”. The review was accompanied by a call for evidence which ran from December 2020 to March 2021. Paragraphs 62-67 of the call for evidence set out the scope of the review regarding regulation of land-based gambling. The main points made were that:

- The land-based sector was getting smaller in comparison with online gambling (from March 2016 to March 2020 the number of gambling premises operated by Gambling Commission licensees fell by 13%).
- The sector was significantly impacted by the Covid-19 pandemic and the resultant periods of premises closure.
- The Government would consider whether the current rules governing land-based gambling are still relevant in the digital age.
- The Government would review the three-tier regulatory framework for casinos.

2.3 Gambling White Paper

Following the DCMS review and associated call for evidence, it was expected that the UK Government would publish a Gambling White Paper in the spring of 2022. However, disruptions and delays due to two changes of Prime Minister in 2022 meant that the Gambling White Paper *High Stakes: Gambling Reform for the Digital Age* (UK Government, 2023) was not published until April 2023, setting out the Sunak government’s plans for modernising the regulation of the gambling sector. A series of key proposals specifically relating to the land-based gambling sector were outlined in Chapter 6 of the White Paper. In particular, the Government proposed to increase the allowances for B1 machines in casinos by:

- Allowing 1968 Act casinos which meet the size and non-gambling space requirements of a 2005 Act Small casino to be entitled to the same 80 maximum machine allowance as the 2005 Act Small casinos, with the machine-to-table ratio being equalised at 5:1 for Large and Small 2005 Act and larger 1968 Act casinos (and therefore, increased from 2:1 to 5:1 for Small casinos).
- Allowing smaller 1968 Act casinos which do not meet the minimum size requirements to install extra B1 machines on a pro rata basis commensurate with their size and non-gambling space, and subject to the same machine-to-table ratios.

Table 2.2 (adapted from Figure 23 in the White Paper) shows the proposed new rules for Casino licences (changes compared to existing licences in bold).

Table 2.2. Proposed new rules for casino licenses, machine/table ratio and space restrictions in Gambling White Paper *High Stakes: Gambling Reform for the Digital Age*

Casino category	1968 Act (smaller than 2005 Act small casino)	1968 Act (meeting size requirements)	2005 Act (Small)	2005 Act (Large)
Number of venues	Approx. 50	Approx. 45	3 (8 licences available)	4 (8 licences available)
Maximum number of Cat B machines	Subject to sliding scale proportionate to size	80	80	150
Machine/table ratio	5:1	5:1	5:1	5:1
Space restrictions:	N/A			
Gambling area		min 500m²	500-1,500m ²	1,500-3,500m ²
Table gaming		TBD	TBD	at least 1,000m ²
Non-gambling		min 250m²	at least 250m ²	at least 500m ²

2.4 Public consultation

From 26 July to 4 October 2023, DCMS conducted a public consultation on the measures relating to the land-based gambling sector in the White paper. The Government response to the consultation was published in May 2024 (DCMS, 2024a). It largely confirmed the changes to the legislative regime announced in the White Paper, with some refinements (e.g. the minimum table gaming area for 2005 Act Small casinos was set at 250 square metres).

2.5 Change of government and legislation via Statutory Instrument

After the Labour victory in the July 2024 general election, the new government reviewed the proposals in relation to modernising the rules for casinos and decided to implement the changes as outlined in the previous government's consultation on this matter.

Legislation via Statutory Instrument (the Casinos (Gaming Machines and Mandatory Conditions) Regulations 2025) followed in May 2025. If approved by the House of Commons this instrument will come into effect on 22 July 2025.

3 Weaknesses in the justifications for intervention in the Impact Assessment

In May 2024 the UK government published the Gaming machine allocation in casinos Impact Assessment (IA) – a document which analyses the impact of the government’s proposed changes to gaming machine allocations in casinos (DCMS, 2024b).

Sections 3 and 4 of this report looks at several different flaws and weaknesses in the IA. This section focuses on the three “key problems” which the government claims the measure is designed to address. These are: (1) regulatory complexities and failure, (2) the impact of limited machine numbers on gambling behaviour and (3) imbalances in the regulatory requirements for land-based British casinos compared to online gaming and casinos in international jurisdictions. These are addressed in Section 3.1, 3.2 and 3.3 respectively.

3.1 Regulatory complexities and failure

The first justification for intervention in the IA is that “there are multiple licensing regimes governing different casinos, meaning that casinos of the same size are... entitled to different numbers of gaming machines” (DCMS 2024b, p1). This is true, but with the benefit of hindsight it is clear that the more liberal licensing regime of a small number of “Large” and “Small” casinos introduced in the 2005 Act has been a failure. Following recent post-Covid closures, at the time of writing only 3 Large casinos and one Small casino are now operational out of a total of 16 permitted under the 2005 Act, down from a maximum of 9 before Covid.

Looking back at the 2005 Act, there was never a clear logic to imposing a number of additional casinos with a larger slot machine allocation onto a market of over 140 casinos licenced under the 1968 Act which generally satisfied demand. The casino sector has also suffered as a result of regulatory failures by the UK Government with respect to online gambling, especially:

- i) the failure to apply a higher tax rate to online gambling than land-based gambling, and
- ii) not requiring online gambling licensees to be based in the UK under a UK tax regime.

3.2 The impact of limited machine numbers on gambling behaviour

The IA states that “a lack of gaming machines in casinos currently leaves consumers with reduced access to machines and limits their choice. In some cases this may lead to participation in other products with fewer player protections instead, such as online slots or spending more time on machines once they do get access” (DCMS 2024b, p1). There are several aspects of this justification for intervention which are problematic, as discussed below.

Peak-time demand for gaming tables

If casinos remove gaming tables to accommodate slot machines, then it seems likely that there will be excess peak time demand for gaming tables for poker and other games. There is existing demand for land-based poker that only casinos can cater for legally at meaningful stakes. Removal of casino poker for slots will increase the likelihood of illegal poker games. This harmful consequence of reducing the area of casinos dedicated to table games is not addressed anywhere in the IA.

Casino machine dwell time and gambling-related harm

Paragraph 1.19 of the IA cites data from the Gambling Commission showing that machines in casinos have a longer dwell time than in other land-based premises. 22 per cent of sessions on Category B machines in casinos tend to last longer than in other gambling premises, compared to 6 to 8 per cent in betting shops, arcades and bingo venues (Gambling Commission, 2023). The IA raises the possibility that “it could be inferred that the longer dwell times in casinos is because gaming machines are inherently more addictive when placed in casinos compared to betting shops. In this case, the proposed measures [for increasing the number of gaming machines in casinos] would risk increasing gambling-related harm.” However, the IA then argues that the opposite is the case – gaming machines in betting shops are actually more addictive than in casinos – using data from the National Gambling Treatment Service (NGTS) which shows that the gambling treatment rate is higher for those who play on gaming machines in betting shops, compared to casinos.

The NGTS data shows that in 2023/24, between 10 and 13 per cent of referred patients reported playing on gaming machines in betting shops compared to less than 3 per cent who reported playing the same machines in casinos. On the basis of this statistic, the IA dismisses the argument that machines in casinos might be more addictive than machines in LBOs. However, this analysis of the NGTS data does not control for the larger number of gaming machines in betting shops compared to casinos. The Gambling Commission’s Industry Statistics for November 2024 show

that in 2023/24 there were 23,344 B3 gaming machines in LBOs compared to 3,147 B1 machines in casino premises. On this basis, there are around twice as many patients referred to the NGTS *per gaming machine* in casinos as there are per gaming machine in LBOs. In other words it is entirely possible that casino gaming machines are inherently *more* addictive than gaming machines in LBOs, and the proposed increases in the maximum number of casino gaming machines do risk increasing gambling-related harm. We discuss the failure of the IA to adequately address concerns around gambling harm in more detail in Section 4.3 below.

Differences between casinos and other land-based outlets with gaming machines

There are differences between casinos and other land-based outlets with gaming machines (Licensed Betting Outlets and Adult Gaming Centres) which are not accounted for in the IA. For LBOs and AGCs, high street accessibility results in more frequent/shorter visits. The demographic of gamblers playing machines in LBOs is also skewed towards lower incomes². There are less than 150 casino venues in Great Britain, more than 20 of which are in London. For the most part, casino venues are less accessible from the high street than LBOs or AGCs and the demographic is wealthier than average, resulting in longer visits in casinos than other licensed betting outlets. Research from Mintel referenced in a judgement from the Competition and Markets Authority (2016) also suggests that casino customers tend to be younger than AGC (adult gaming centre) customers and that casino visitors are focused primarily on the gaming table and the bar, and to a much less extent on gaming machines. The Mintel Report includes survey evidence showing that only 29% of respondent casino visitors had played a slot machine during a visit in the previous 12 months.” This suggests that casino slot machines are only relevant for a minority of casino visitors.

3.3 Inappropriate comparisons of casino machine gaming in Britain with other countries and online gaming

The Impact Assessment makes a number of inappropriate comparisons between B1 machine gaming in casinos in Great Britain and casino gaming in other jurisdictions – land-based gaming in other countries, and online gaming. These are discussed in more detail below.

² For example, analysis of data from the Gambling Survey for Great Britain Wave 1 (UK Data Archive, 2025) suggests that around 32 per cent of casino visitors are from the top two quintiles of the household income distribution compared to only 18 per cent of respondents who played slot machines in LBOs.

Land-based casino machine gaming in Britain compared to other countries

The IA states that “online casino gaming is not subject to the same regulatory requirements as land-based casinos, and many international jurisdictions do not have such restrictive regulations. This imbalance is putting land-based GB casinos at a competitive disadvantage.” But casino slots games in Great Britain do not compete internationally – it is most unlikely that gamblers would travel to Britain, instead of their home country or another country, just to play slot machines.

Comparison of land-based machine gaming with online gaming

The IA makes comparisons between machine gaming in casinos in Britain and online slots games which are not appropriate. It is reasonable to compare online poker and other table games with land-based table games in Britain, as the land-based games are only available in casinos. But for machine gaming, it does not make sense to compare online slots games with casinos in isolation because this misses out machines in LBOs, AGCs, bingo halls and pubs. The Gambling Commission’s November 2024 *Industry Statistics* show that only 3,147 out of a total of more than 54,000 Category B gaming machines in Britain are in casinos.

The UK Government’s strategy seems to be to expand the number of B1 machines in casinos by comparing casino machines with online slot-based gambling while ignoring other types of category B machines in LBOs, AGCs and other venues.

Failure to take account of recent trends in the land-based gaming market

The original consultation which led to the 2023 Gambling White Paper concluded in March 2021 – over four years ago. Developments in other parts of the land-based gambling sector since 2021 – in particular, an increase of more than 20 per cent in the number of B3 gaming machines in Adult Gaming Centres [ref Brent Council] are not included in the evidence base for the original consultation. Concerns regarding the proliferation of AGCs such as those raised by Brent Council in its letter to the Culture Secretary Lisa Nandy in April 2025 (Office of the Leader of Brent Council, 2025) are not addressed in the Gambling White Paper or subsequent legislation.

4 Other problems with the Impact Assessment

4.1 Redacted information

There is a substantial amount of redacted information in the Impact Assessment document, for example:

- Information on the proportion of gaming machine sessions by stake size (Table 10)
- Information on the percentage of sessions resulting in wins or losses of various amounts (Table 11)
- The proportion of gaming machine sessions by session length (Table 12)
- Other evidence from gaming machine data (paras 2.61 and 2.62)
- Data on casino operator numbers by size of business (Table 24)³.

These statistics are based on anonymised collated data from machine operators, and there is no obvious reason to redact it.

The budget for the first two years of the programme to evaluate the changes to casino regulations was also redacted, which makes it impossible for commentators and researchers to know whether the proposed budget is sufficient to enable a comprehensive and credible evaluation.

Both these points were raised by Lord Foster of Bath in the House of Lords debate on the Statutory Instrument (UK Parliament, 2025), with the government minister failing to respond to Lord Foster's questions regarding the redactions.

The fact that this important information has been redacted shows that the Gambling Commission and DCMS are too close to the Betting and Gaming Council and gambling machine operators. This issue is discussed in more detail in Section 6 of this report.

4.2 Inconsistency with previous government policy

Looking at the DCMS document *2013 Triennial Review of Gaming Machine and Prize Limits: Govt Response to Consultation on Proposals for Changes to Maximum Stake and Prize Limits for Category B, C and D Gaming Machines* (DCMS, 2013), the consultation proposed a rise in the maximum stake for B1 machines from £2 to £5 and sought views on a range of prize limits from £4,000 (then the current limit) up to £15,000. The GC advised the govt (para 28) that there was scope to increase stake and prize limits on B1 machines, "provided risk is mitigated through the development, trialling and evaluation of improved harm mitigation measures".

³ All references in this bulleted list are to DCMS (2024b).

The Government response to the consultation stated that “the Government recognises that access to higher stake and prize gaming machines can support socially responsible growth in the casino sector... the Government also notes the advice of the RGSB and GC which supports the Govt’s view that there is scope to increase stake and prize limits on B1 machines, *provided the potential risk is mitigated through the development, trialling and evaluation of improved harm mitigation measures*“. This commitment to improving harm mitigation alongside increases in stake limits seems to have largely disappeared from the 2023 Casino Impact Assessment document.

4.3 Insufficient attention to gambling harms

The original terms of reference of the Gambling Act 2005 (launched December 2020) had three objectives, two of which were focused on gambling-related harms:

- a. Ensure there is an appropriate balance between consumers freedoms and choice on the one hand, and prevention of harm to vulnerable groups and wider communities on the other
- b. Make sure customers are suitably protected whenever and wherever they are gambling, and that there is an equitable approach to the regulation of the online and land-based industries.

Neither of these objectives appear to be achieved in the DCMS IA, which seems mostly focused on the benefits to businesses from expanding the number of B1 gaming machines. In quantitative terms (measuring the net costs and benefits of the policy) the IA is *wholly* focused on the net benefits to businesses (in terms of increased profitability). There is no attempt to quantify the losses to gamblers or society – despite the fact that several existing estimates of the cost of gambling harm exist which could have been utilised (see UK Government 2023 para 2.53, p33).

There is clear evidence from recent survey data of substantial rates of gambling harm for machine gamers in land-based casinos. Table 4.1 below shows that in the Gambling Survey of Great Britain (GSGB) Wave 1 data, problem gambling rates for fruit and slot machine players in casinos are higher than for any other land-based venue, at almost 57 per cent. (LBOs are second highest at just under 50 per cent). This compares with a problem rate for online gamblers of 25 per cent. All these rates of problem gambling are much higher than the rate for those who participated in any gambling in the last 4 weeks (excluding those who played lotteries or scratchcards only), which was just over 7 per cent. For casino gamblers *excluding* those who played fruit or slot machines the problem gambling rate was 23 per cent.

Table 4.1. Problem gambling rates for fruit/slot machine players in different land-based locations compared to online slots, 2023

Location	Proportion of players problem gambling
Land-based venues:	
Pubs/bars/clubs	24.0%
Adult Gaming Centres	22.7%
Casinos	56.8%
Bingo halls	35.3%
Licensed Betting Outlets	49.6%
Online	25.0%
Any gambling in last 4 weeks (excluding lottery/scratchcards)	7.2%
Any casino gambling excluding fruit/slot machines	23.4%

Source: author's analysis of Gambling Survey of Great Britain Wave 1 data

4.4 Problems with the Equalities Assessment

The equalities impact assessment of the casino machine regulatory changes is in paragraphs 3.8 to 3.13 of the IA. The equalities impact assessment admits that “it may be the case that certain groups have a disproportionately high level of participation on gaming machines” – in particular young adults (aged between 18 and 25), males (who have a higher participation rate than females) and adults living in Scotland, Yorkshire and the Humber and the East Midlands (which are the regions with the highest proportion of people playing fruit and slot machines). The IA uses data from the GSGB to show the differences in participation rates on fruit and slot machines by various characteristics. However, no attempt is made to analyse differences in problem gambling rates for slot machine players by protected characteristics under the Equality Act 2010. A regression analysis of the GSGB Wave 1 data⁴ shows that among survey respondents who had played fruit or slot machines (either online or in a land-based venue):

- men were significantly more likely to be problem gambling than women
- adults aged 25 to 34 were significantly more likely to be problem gambling than adults aged 45 or over
- adults of Asian ethnicity were significantly more likely to be problem gambling than other ethnic groups.

⁴ Source: author's analysis of GSGB Wave 1 survey data (UK Data Archive, 2025).

4.5 Inconsistency between the rationale for £5 versus £2 maximum stakes in online gaming and land-based gaming

Given the rates of problem gambling for slot machine players in various venues indicated in Table 4.1, it is worth mentioning the UK Government's introduction of maximum stake limits for online machine gaming in 2025, via another Statutory Instrument (UK Government 2025b). The Government has introduced a maximum stake of £5 for online players aged 25 and over and a maximum stake of £2 for players aged 18 to 24. In its response to the consultation in respect of this measure which ran parallel to the casino gaming machine consultation (DCMS 2024c) the DCMS stated:

We have specifically considered whether this policy is likely to impact persons who share particular protected characteristics as set out in the Equality Act 2010. Our proposals seek to support equalities. To the extent that some gambling harms are more prevalent within young adults, our specific protections for that cohort including the lower proposed maximum stake limit will have a positive equalities impact.

(DCMS 2024c)

With regards to online gaming, the Government appears to accept the principle that groups who are more vulnerable to gambling harms should have lower stake limits. However, for casino gaming compared to gaming in other land-based venues, the opposite seems to be the case: machine gamers in casinos have the highest rates of problem gambling but also a higher maximum stake than other land-based machine gamers (£5 maximum in casinos compared to £2 maximum in other venues).

5 The RPC review of the Impact Assessment

The Regulatory Policy Committee (RPC) is the independent regulatory scrutiny body for the UK Government. According to its website, “the Committee assesses the quality of evidence and analysis used to inform government regulatory proposals.” The RPC published its evaluation of the casino gaming machines IA in April 2025 (Regulatory Policy Committee, 2025) awarding it a green (“fit for purpose”) rating. The RPC awarded this rating despite suggesting that “the IA should provide a more robust balanced assessment of societal costs because of increased gambling harm, as well as providing more narrative on international evidence”.

It seems inconsistent for the RPC to make this criticism (that the IA doesn’t pay sufficient attention to gambling harm) while still signing the IA off as fit for purpose.

Footnote 1 of the RPC evaluation explicitly states that “the RPC opinion rating is based only on the robustness of the EANDCB [Equivalent Annual Net Direct Cost To Business] and quality of the SaMBA [Small and micro business assessment] as set out in the Better Regulation Framework”. Based on this, it is the Better Regulation Framework which is not fit for purpose. The framework appears to prioritise the impact of regulation on businesses while ignoring the impact on consumers – effectively implying that gambling harms do not matter.

6 The apparent influence of the Betting and Gaming Council on casino legislation

This final section of the report summarises publicly available evidence regarding the apparent influence of the Betting and Gaming Council (BGC) – the industry body for the gambling industry – on the development of casino legislation.

6.1 Changes to the original draft legislation for 2005 Act “Small casinos”

A story from The Times newspaper (D. Walsh, “Small casinos to lose out on reforms”, *The Times* 7.7.2022) suggested that the original draft of the white paper limited the increase in the number of B1 machines from 20 to 80 to larger casinos only, “excluding about 70 of the UK’s 121 casinos from the rule relaxation”. Following the partial leak of the draft of the white paper in this story, the eventual proposal in the White Paper “[High stakes: gambling reform for the digital age](#)” increased the machine allowance to 80 for all casinos over a size threshold of 500 sqm gambling area and 250 sqm table gaming area (with a sliding scale for casinos smaller than this size threshold). This is considerably more lenient than the original white paper draft and seems to have been adopted to placate the BGC.

6.2 Comparisons between evidence submitted to CMS select committee gambling inquiry and the White Paper

The Casino Operators Group of the BGC submitted written evidence to the House of Commons Select Committee’s inquiry into gambling regulation (BGC, 2022). The final report from the inquiry was published in December 2023 (Culture, Media and Sport Committee, 2023), but the committee was receiving written evidence for the inquiry in late 2022 and early 2023 – before the publication of the white paper.

Reading the BGC’s written evidence, it seems clear that the reforms announced by the Government in the Gambling White paper were similar to what the BGC advised. For example, the BGC states that:

Under current legislation, most casinos are limited to just 20 gaming machines, regardless of size of venue or number of customers served. Whatever purpose this very low limit was expected to serve, it is clearly redundant in the Digital Age where an estimated 750,000 personal devices are used for playing slots-style games. As the DCMS has acknowledged, Britain’s casinos offer customers the highest levels of protection but – perversely – are subject to the most parsimonious laws where machine gaming is concerned. It is estimated that fewer than 2% of all gaming

machines in Britain are located within casinos – and this falls to less than 0.5% if personal devices used for playing online slots games are included. Adoption of our modest proposals for modernisation – where casinos would be permitted to offer up to 80 machines (subject to both gaming and non-gaming space requirements to preserve the character of Britain’s casinos) – represent the fulfilment of the expectations of the Gambling Act 2005; and are in line with the recommendation of this Select Committee in 2013 (as well as the House of Lords Select Committee on the Gambling Industry in 2021).

(BGC 2022, p4)

The BGC’s argument that online gaming is less regulated than casino gaming and so the regulations on casino gaming need to be relaxed is along similar lines to one of the justifications for intervention given in the Impact Assessment (analysed in Section 3.3 above). The “modest proposals for modernisation” recommended by the BCG are very similar to the proposals outlined in the White Paper and actioned by the Government in the Statutory Instrument.

Following the publication of the Gambling White Paper the BCG submitted a supplementary evidence document (BGC, 2024). This document observed that:

GB casinos have been working with outdated regulation primarily written in 1968, which has constrained innovation and had a detrimental impact on customer satisfaction. Current legislation limits most casinos to just 20 gaming machines regardless of venue size or customer numbers, a restriction that clearly serves little purpose other than to frustrate customers who have long waits to play. There have also been no suggestions of negative consequences from the higher machine allocations in 2005 Act casinos. The proposed reforms to determining machine allocations will permit casinos to better meet customer preferences within existing high levels of controls and may serve an additional protective function by making it easier for customers to take regular breaks in play.

(BGC 2024, para 1.2-1.3)

The issue of “dwell time” is discussed in Section 3.2 of this report, where the evidence for a shortage of B1 machines in casinos is nowhere near as clear-cut as the BGC suggests. Furthermore, given the extremely high rates of problem gambling for casino machine gamers in the Gambling Survey for Great Britain, it is simply not true that there are “no suggestions of negative consequences from the higher machine allocations in 2005 Act casinos”. The available evidence suggests that the risk of harm to casino machine gamblers is all too real, and that this risk has been downplayed both by the BGC and the UK Government.

7 Conclusion

It is clear that none of the three justifications for intervention in the Impact Assessment constitute a convincing case for the reforms to casino gaming machine allocations (and revisions to minimum/maximum floor space) presented in the Gambling White Paper and formalised in the 2025 Statutory Instrument. First, it seems clear that the introduction of a more liberalised regimes for a subset of casinos in the 2005 Gambling Act has largely been a failure, and it is not clear why it is a good idea for casino regulation in Britain to head further in that direction. Second, the increase in the maximum permitted number of B1 gaming machines in casinos is likely to increase gambling-related harm, given the very high observed rates of problem gambling among machine gamers in casinos. Increasing the number of machines in casinos could also have unintended adverse consequences by reducing the amount of space allocated to table games. Third, the framework used for comparing land-based casino machine gaming in Britain with other jurisdictions (casinos abroad and online casino gaming) is not appropriate and instead, underlines the fact that online gambling is under-regulated in the UK. In addition, it is not appropriate to assess casino machine gaming in isolation from other land-based machine gaming – the Government needs to consider AGCs, LBOs, pubs and other venues when making a decision about the optimal regulatory regime.

As well as the headline justifications for intervention, the Impact Assessment also suffers from a number of other problems. These include redacted information from casino operators for no good reason, inconsistency with previous government policy, insufficient attention to gambling harms, an unsatisfactory Equalities Impact Assessment and an inconsistent approach to setting maximum stakes for machine gaming in online and land-based settings.

Furthermore, the RPC Opinion on the Impact Assessment greenlights the IA while failing to pay sufficient attention to its shortcomings – especially regarding potential increase in gambling harms if the number of B1 machines is allowed to increase.

Worryingly, this report finds evidence that DCMS is too close to BGC and gambling operators in terms of the BGC's apparent influence on policy and the close congruence between what the BGC recommended and the policy that has been implemented after consultations and reviews.

Finally, it is also worth emphasising that the Labour Party's 2024 election manifesto committed to "reducing gambling-related harms" but that is incompatible with the changes to casino gaming machine regulations as they have been implemented.

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