

From: elizabeth speed [mailto:elizabethspeed@luxuryleisure.co.uk]
Sent: 17 September 2015 12:26
To: LICENSING
Subject: Gambling Act 2005 – Statement of Principles Consultation

Dear Sirs

Re: Gambling Act 2005 – Statement of Principles Consultation

On behalf of Luxury Leisure, I make the following comments in response to the above consultation draft (the "Draft"):-

1. As the Authority will appreciate, in all matters of regulation under the Gambling Act 2005, it is subject to the Regulators' Code. That code imposes a number of obligations on the Authority, including one that it should carry out its activities in a way that supports those it regulates to comply and grow. Additionally, when designing and reviewing policies, the Authority must, among other things, understand and minimise the negative economic impact of its regulatory activities and regulate and minimise the costs of compliance of those it regulates. Further, the Authority should take an evidence-based approach in determining priority risks and recognise the compliance record of those it regulates. Accordingly, we suggest that the Draft makes reference to this key influence, confirming that the Authority recognises that it is subject to and will comply with the Regulators' Code in relation to matters of gambling licensing and enforcement.
2. In Part B, Paragraph 1, at the bottom of page 7, reference is made to the third licensing objective and with reference to children, states "...that in practice that means not only preventing them from taking part in gambling but also preventing them from being in close proximity to gambling." As the Authority will appreciate, children are permitted to participate in some gambling and as such this passage is inappropriate as drafted - plainly they are permitted to be in close proximity to gambling in which they are participating.
3. The Draft deals with local risk assessments (R/As) at Part B Pages 9 and 10. It is important that the obligations concerning R/As are correctly set out. With respect, as currently drawn, the Draft does not do so clearly. Licensees or Applicants are obliged by the LCCP to "assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises and have policies and procedures and control measures to mitigate those risks.....". It is not, as the Draft suggests, a matter of preparing a R/A "of the local area" which suggests the obligation extends to providing a R/A for the area, divorced from the premises themselves. This is far beyond the parameters of the LCCP. We suspect that it was not intended to seek to cast the obligation as widely as the Draft suggests and we believe it important that the wording be revisited.
4. The Draft details in bullet points examples of factors for operators to consider. For clarity, we suggest that the Draft be amended to make clear that the location of schools, hostel, etc., are only relevant in the local area of the premises and not more widely.

5. One of the bullet points suggests that R/As should take account of the location of religious buildings in the area. The Draft does not refer to the Licensing Objective it suggests is engaged by such matters and we struggle to identify it. The R/A is to be about the risk to licensing objectives in the area local to the premises. This does not relate to a licensing objective and should be removed.
6. The Draft bullet points also refer to “available information about issues with problem gambling in the area”. This is so broadly worded as to be incapable of clearly ascertaining the extent of the obligation. Taken to its extreme, the wording could include information available anywhere in the world. We appreciate this is not the intention, but equally to ensure the operators’ obligations are clear, transparent and enforceable, we believe this passage should be corrected to narrow the scope, perhaps by saying “reasonably available”.
7. In the final bullet point of this section the Draft states that operators should assess the density of gambling premises in their locality. With respect, licensed gambling is a legal and legitimate leisure activity. Asking operators to take into account the existing density of licensed premises risks encroaching on matters of demand. If matters of density were to give rise to any concerns about crime and disorder, that would already be covered in an earlier bullet point in the section and by one of the three licensing objectives. This bullet point ends by saying that operators should “assess any negative impact their premises may have in that area” – although the Draft does not say it, this is of course limited to negative impact in terms of the licensing objectives and we suggest that this passage be amended to expressly reflect this. Of course, this final part (as underlined above) in relation to the licensing objectives, is what the R/As are actually about.
8. Although the Draft confirms that the Authority will seek to avoid duplication with other regimes, we note that there are a number of places where the Draft repeats the provisions of mandatory and default conditions and the LCCP. There is no need for the Authority to duplicate those conditions which are applied through legislation/conditions. Accordingly a number of the “measures” that are given as examples on page 11 are unnecessary. Similarly, the provisions referred to on page 12 for premises which offer Category C or above machines, are already set out in the Mandatory Conditions; and many of the bullet points at page 14 for AGCs and FECs are also duplicated as they appear in the LCCP and mandatory conditions. Furthermore, we do not understand why it was felt unnecessary to include such provisions for bingo and betting (other than tracks), if it is necessary to include them for AGCs and FECs. As well as being an unnecessary approach, it would be inconsistent to proceed in this way.

We hope that the above will assist.

Yours faithfully

Elizabeth Speed
Group General Counsel
Novomatic UK
For Luxury Leisure
Direct +44 (0) 191 497 8222
Mobile +44 (0) 7808 571 588
elizabethspeed@luxuryleisure.co.uk

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Croydon Council Place Department
Licensing Team Floor 10 Zone B
Bernard Weatherill House
8 Mint Walk
Croydon
CRO 1EA

Please ask for: Richard Taylor
Direct Tel: 01482 590216
Email: rjt@gosschalks.co.uk
Our ref: RJT / LHK / 097505.00004
#GS408987
Your ref:
Date: 07 October 2015

Dear Sir/Madam,

Re: Gambling Act 2005 Policy Statement Consultation

We act for the Association of British Bookmakers (ABB) and have received instructions to respond on behalf of our client to the current consultation on the Council's review of its gambling policy statement.

The ABB represents over 80% of the high street betting market. Its members include large national operators such as William Hill, Ladbrokes, Coral and Paddy Power, as well as almost 100 smaller independent bookmakers.

This response will explain the ABB approach to partnership working with local authorities, it will detail its views on the implementation of the new LCCP requirements, from April 2016, relating to operators' local area risk assessments and their impact on the licensing regime and will then make specific comment with regard to any statement(s) of concern/that are welcomed in your draft policy.

The ABB is concerned to ensure that any changes are not implemented in such a way as to fundamentally change the premises licence regime through undermining the "aim to permit" principle contained within s153 Gambling Act 2005.

The current regime already adequately offers key protections for communities and already provides a clear process (including putting the public on notice) for representations/objections to premises licence applications. The recent planning law changes effective since April 2015 have also already increased the ability of local authorities to consider applications for new premises, as all new betting shops must now apply for planning permission.

It is important that any consideration of the draft policy and its implementation at a local level is put into context. There has recently been press coverage suggesting that there has been a proliferation of betting offices and a rise in problem gambling rates. This is factually incorrect.

Over recent years betting shop numbers have been relatively stable at around 9,000 nationally, but more recently a trend of overall downwards decline can be seen. The latest Gambling Commission industry statistics show that numbers as at 31 Mar 2015 were 8,958 - a decline of 179 from the previous year, when there were 9,137 recorded as at 31 March 2014.

As far as problem gambling is concerned, successive prevalence surveys and health surveys reveal that problem gambling rates in the UK are stable (0.6%) and possibly falling.

Working in partnership with local authorities

The ABB is fully committed to ensuring constructive working relationships exist between betting operators and licensing authorities, and that where problems may arise that they can be dealt with in partnership. The exchange of clear information between councils and betting operators is a key part of this and we welcome the opportunity to respond to this consultation.

There are a number of examples of the ABB working closely and successfully in partnership with local authorities.

LGA – ABB Betting Partnership Framework

In January 2015 the ABB signed a partnership agreement with the Local Government Association (LGA). This was developed over a period of months by a specially formed Betting Commission consisting of councillors and betting shop firms and established a framework designed to encourage more joint working between councils and the industry.

Launching the document Cllr Tony Page, LGA Licensing spokesman, said it demonstrated the *"...desire on both sides to increase joint-working in order to try and use existing powers to tackle local concerns, whatever they might be."*

The framework built on earlier examples of joint working between councils and the industry, for example the Ealing Southall Betwatch scheme and Medway Responsible Gambling Partnership.

In Ealing, the Southall Betwatch was set up to address concerns about crime and disorder linked to betting shops in the borough. As a result, crime within gambling premises reduced by 50 per cent alongside falls in public order and criminal damage offences.

In December last year, the Medway Responsible Gambling Partnership was launched by Medway Council and the ABB. The first of its kind in Britain, the voluntary agreement allows anyone who is concerned they are developing a problem with their gambling to exclude themselves from all betting shops in the area.

The initiative also saw the industry working together with representatives of Kent Police and with the Medway Community Safety Partnership to develop a Reporting of Crime Protocol that is helpful in informing both the industry, police and other interested parties about levels of crime and the best way to deal with any crime in a way that is proportionate and effective.

Lessons learnt from the initial self-exclusion trial in Medway have been incorporated into a second trial in Glasgow city centre, launched in July this year with the support of Glasgow City Council, which it is hoped will form the basis of a national scheme to be rolled out in time for the LCCP deadline for such a scheme by April 2016.

Jane Chitty, Medway Council's Portfolio Holder for Planning, Economic Growth & Regulation, said: *"The Council has implemented measures that work at a local level but I am pleased to note that the joint work we are doing here in Medway is going to help the development of a national scheme."*

Describing the project, Glasgow's City Treasurer and Chairman of a cross-party Sounding Board on gambling, Cllr Paul Rooney said:

"This project breaks new ground in terms of the industry sharing information, both between operators and, crucially, with their regulator."

Primary Authority Partnerships in place between the ABB and local authorities

All major operators, and the ABB on behalf of independent members, have also established Primary Authority Partnerships with local authorities.

These Partnerships help provide a consistent approach to regulation by local authorities, within the areas covered by the Partnership; such as age-verification or health and safety. We believe this level of consistency is beneficial both for local authorities and for operators.

For instance, Primary Authority Partnerships between Milton Keynes Council and Reading Council and their respective partners, Ladbrokes and Paddy Power, led to the first Primary Authority inspection plans for gambling coming into effect in January 2015.

By creating largely uniform plans, and requiring enforcing officers to inform the relevant Primary Authority before conducting a proactive test-purchase, and provide feedback afterwards, the plans have been able to bring consistency to proactive test-purchasing whilst allowing the Primary Authorities to help the businesses prevent underage gambling on their premises.

Local area risk assessments

With effect from 6th April 2016, under new Gambling Commission LCCP provisions, operators are required to complete local area risk assessments identifying any risks posed to the licensing objectives and how these would be mitigated.

Licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy and local area profile in their risk assessment, and these must be reviewed where there are significant local changes or changes to the premises, or when applying for a variation to or a new premises licence.

The ABB is concerned that overly onerous requirements on operators to review their local risk assessments with unnecessary frequency could be damaging. As set out in the LCCP a review should only be required in response to significant local or premises change. In the ABB's view this

should be where evidence can be provided to demonstrate that the change could impact the premises' ability to uphold the three licensing objectives.

Although ABB members will be implementing risk assessment at a local premises level, we do not believe that it is for the licensing authority to prescribe the form of that risk assessment. We believe that to do so would be against better regulation principles. Instead operators should be allowed to gear their risk assessments to their own operational processes informed by Statements of Principles and the local area profile.

The ABB supports the requirement as set out in the LCCP, as this will help sustain a transparent and open dialogue between operators and councils. The ABB is also committed to working pro-actively with local authorities to help drive the development of best practice in this area.

Local Area Profiles – Need for an evidence based approach

It is important that any risks identified in the local area profile are supported by substantive evidence. Where risks are unsubstantiated there is a danger that the regulatory burden will be disproportionate. This may be the case where local authorities include perceived rather than evidenced risks in their local area profiles.

This would distort the "aim to permit" principle set out in the Gambling Act 2005 by moving the burden of proof onto operators. Under the Act, it is incumbent on licensing authorities to provide evidence as to any risks to the licensing objectives, and not on the operator to provide evidence as to how they may mitigate any potential risk.

A reversal of this would represent a significant increase in the resource required for operators to be compliant whilst failing to offer a clear route by which improvements in protections against gambling related harm can be made.

We would also request that where a local area profile is produced by the licensing authority that this be made clearly available within the body of the licensing policy statement, where it will be easily accessible by the operator and also available for consultation whenever the policy statement is reviewed.

Concerns around increases in the regulatory burden on operators

Any increase in the regulatory burden would severely impact on our members at a time when overall shop numbers are in decline, and operators are continuing to respond to and absorb significant recent regulatory change. This includes the increase to 25% of MGD, changes to staking over £50 on gaming machines, and planning use class changes which require all new betting shops in England to apply for planning permission.

Moving away from an evidence based approach would lead to substantial variation between licensing authorities and increase regulatory compliance costs for our members. This is of particular concern for smaller operators, who do not have the same resources to be able to put

into monitoring differences across all licensing authorities and whose businesses are less able to absorb increases in costs, putting them at risk of closure.

Such variation would in our opinion also weaken the overall standard of regulation at a local level by preventing the easy development of standard or best practice across different local authorities.

Employing additional licence conditions

The ABB believes that additional conditions should only be imposed in exceptional circumstances where there are clear reasons for doing so - in light of the fact that there are already mandatory and default conditions attached to any premises licence. The ABB is concerned that the imposition of additional licensing conditions could become commonplace if there are no clear requirements in the revised licensing policy statements as to the need for evidence.

This would further increase variation across licensing authorities and create uncertainty amongst operators as to licensing requirements, over complicating the licensing process both for operators and local authorities.

Specific Policy Comments

Within the General Principles in paragraph 1 to Part B, there is an acknowledgment that moral objections to gambling and unmet demand are not criteria for a licensing authority when considering an application for a premises licence. The statement of principles would be assisted by recognising at this stage that issues of nuisance and the likelihood of the grant of planning permission or building regulation approval are also criteria which cannot be considered as part of a Gambling Act 2005 application.

On page 8, there is reference to "primary gambling activity" and a statement that the council endorses the view of the Gambling Commission that the primary activity of the premises should be that described, with gaming machines as an ancillary offer on the premises. Section 6 (Betting Premises) also makes reference to primary gambling activity. These sections paraphrase the advice note issued by the Gambling Commission in October 2013 – Indicators of Betting as Primary Gambling Activity but do not take into account the subsequent case law. The issue of primary gambling activity was considered in the case of *Luxury Leisure Limited v Gambling Commission* – May 2014 and the statement of principles needs to be amended to reflect the decision in that case. The decision was that there is no need for a contest between actual use of traditional over the counter betting and the use of gaming machines. The issue for consideration is whether or not there are sufficient facilities for betting available. The actual use of the facilities is not an issue. On this basis, the paragraph headed "Primary Gambling Activity" needs to be slightly amended whereas section 6 (Betting Premises) needs to be rewritten to ensure that there is no suggestion that operators will need to demonstrate over the counter betting as a primary activity of the premises.

The section head "Location" similarly needs to be reconsidered. This refers to the need to prepare local risk assessments when making applications for new licences/ variations. The statement of

principles lists factors that it believes gambling operators should consider. Some of these are irrelevant.

The Social Responsibility Code Provision 10.1.1 requires that licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities and that licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy. It is therefore a requirement that the licensing authority identifies issues relevant to the licensing objectives. It is only risks to the licensing objectives that need to be dealt with. Therefore, the proximity of a proposed betting office to a religious building cannot be a relevant consideration. This is also directly contrary to the Gambling Commission's view (recognised earlier in the statement of principles) that moral objections to gambling are not a valid reason to reject applications.

The status of the night time economy cannot be a relevant consideration. The first licensing objective is preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime. Issues of anti-social behaviour, therefore, caused outside gambling premises cannot be an issue for a local area risk assessment.

The penultimate bullet point indicates "Croydon has a diverse socio-economic makeup and the council will expect operators to assess the risks that a licensed premises may present in such areas and to set out any mitigation measures that they would intend to use to reduce any such risks." It is not clear what this means. The socio-economic makeup of an area has no relevance to whether or not a gambling establishment is operating in a manner that is reasonably consistent with the licensing objectives.

The final bullet point indicates that the council will expect operators to assess the existing density of licensed gambling premises in the area. Once again, this can have no bearing on the licensing objectives. Demand is not an issue for consideration and therefore unless there is a risk to the licensing objectives caused by proximity (and it is difficult to see how there possibly can be) then this is an irrelevant consideration and this bullet point should be removed.

The statement of principles would be assisted by an acknowledgement in the exposition of the licensing objectives, that the prevention of nuisance is not a licensing objective under Gambling Act 2005.

The ABB welcomes the fact that any conditions attached to licences will be proportionate, relevant, directly related to the premises and reasonable in all respects. The statement of principles would be assisted by a statement that the starting point, when considering an application, is that it will be granted subject only to the mandatory and default conditions. The statement of principles should be clear that additional conditions will only be imposed where there is evidence of a risk to the licensing objectives such that there is a need to supplement the existing mandatory and default conditions. The policy should also be clear that conditions will only be imposed where there is evidence rather than a "perceived need" or a "concern".

The ABB welcomes the acknowledgement that there is currently no apparent evidence that the operation of betting offices requires door supervision and that this will only be considered if there is clear evidence of a need to do so.

Conclusion

The industry fully supports the development of proportionate and evidenced based regulation, and is committed to minimising the harmful effects of gambling. The ABB is continuing to work closely with the Gambling Commission and the government to further evaluate and build on the measures put in place under the ABB Code for Responsible Gambling, which is mandatory for all our members.

ABB and its members are committed to working closely with both the Gambling Commission and local authorities to continually drive up standards in regulatory compliance in support of the three licensing objectives: to keep crime out of gambling, ensure that gambling is conducted in a fair and open way, and to protect the vulnerable.

Indeed, as set out, we already do this successfully in partnership with local authorities now. This includes through the ABB Code for Responsible Gambling, which is mandatory for all our members, and the Safe Bet Alliance (SBA), which sets voluntary standards across the industry to make shops safer for customers and staff. We would encourage local authorities to engage with us as we continue to develop both these codes of practice which are in direct support of the licensing objectives.

Yours faithfully,



GOSSCHALKS

The Licensing Team
Place Department
London Borough of Croydon
Floor 10, Zone B
Bernard Weatherill House
8 Mint Walk
Croydon
CRO 1EA

15th October 2015

Dear Sir,

Consultation on the London Borough of Croydon Council's Statement of Principles – Gambling Act 2005

Coral Racing Limited is most grateful to be given the opportunity to respond to this consultation exercise. Coral was one of the first national bookmakers to be licensed under the Betting and Gaming Act of 1960, and so has been operating the length and breadth of the UK for over 50 years. Its premises comprise locations in the inner city, on the high street, in suburbs and in rural areas, and in areas of both high and low deprivation. It now operates 1850 betting offices across Great Britain, which comprise about 20% of all licensed betting offices. It is, therefore, a highly experienced operator.

Coral Racing Limited are supportive of the document. It again notes that the Board when considering applications are still required to 'aim to permit gambling' where this is 'reasonably consistent with the licensing objectives', additionally noting that it should not take into account of any moral objections to gambling.

Coral Racing Limited recognise the requirement to supply risk assessments with future applications and variations (requirement is from 6th April 2016) following the consultation completion (your detail commences on Page 9). We do politely wish to highlight that we are not of the opinion however regarding the proximity of a premises in relation to schools and leisure facilities. Whilst each application will be judged on its merits as mentioned at several points within your statement, Coral knows of no evidence that the location of a licensed betting office within the proximity of schools and similar locations mentioned in the risk statement causes harm to the licensing objectives. We appreciate that such locations are included within Gambling Commission guidance to councils but wish to ensure that by inclusion in the risk assessment, there is no inference that such locations are at greater risk of causing harm to the licensing objectives.

Coral knows of no evidence that children coming from schools are gaining access to betting offices. Coral's general experience, in common with other bookmakers, is that children are not interested in betting, and in any case the Think 21 policy operated by Coral is adequate to ensure that under-age gambling does not occur in their premises. There are very many examples of betting offices sited immediately next to schools and colleges and no evidence whatsoever that they cause problems.

Coral's experience is that, through all it does, it achieves an exemplary degree of compliance, and attracts negligible evidence of regulatory harm. Through the additional local risk assessment to be introduced with future premises licence applications from April 2016, Coral believe that these should be a) to assess specific



Coral Racing Limited
One Stratford Place, Montfichet Road, London E20 1EJ
Registered Office: New Castle House, Castle Boulevard, Nottingham NG7 1FT
Registered in England No. 541600
Tel: 020 3288 7000 Fax: 020 3288 7050



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risks to the licensing objectives in the local area, and b) to assess whether control measures going beyond standard control measures are needed.

If we can provide any further information, we would be pleased to do so.

Yours faithfully,



John Liddle
Director of Development – Coral Retail

From: Andrew Lyman [<mailto:alyman@williamhill.co.uk>]
Sent: 16 October 2015 15:25
To: LICENSING
Subject: Response to Consultation on Gambling Act Statement of Principles

Set out below is William Hill's response to the consultation on the Statement of Principles for Gambling.

William Hill is currently the UK's largest betting operator with some 2300 betting shops. We have 29 shops within the Authority area.

The Authority will have its own data on the number of betting shops, but we believe that there has been no significant rise in overall industry shop numbers (as a percentage of total shop numbers) since the inception of the Gambling Act 2005.

We value being in the regulated sector and commit considerable financial and other resources to regulatory compliance, community engagement and corporate responsibility.

The Council should be clear that it is under a legal duty to aim to permit gambling. It therefore follows that it cannot then construct a Statement of Principles that seeks, in anyway, to undermine that fundamental principle.

William Hill makes application for premises licenses having been through a Gambling Commission suitability assessment and having been granted an Operating licence,

It is, like other operators, subject to an extensive regulatory regime both at operating and premises level.

Whilst we support the idea of localised premises risk assessment, the Authority must not seek to reverse the burden of proof in the licensing process by creating a number of additional hurdles to compliance.

The Authority should periodically publish a comprehensive and evidence based local area profile. Operators should not just have to work through a list of theoretical risk factors and second guess the Authority. For example, the fact that an area has a relatively higher crime rate, is deprived or contains a higher proportion of young families or youth premises is on its own broadly irrelevant. The question is "can that betting premises in that location (with the appropriate risk controls) operate in a manner that is broadly consistent with the Licensing Objectives). The Authority needs to publish clear and transparent data relating directly to gambling related harm. Operators should not have to second guess the Authority. This would clearly be against better regulation principles.

We note that this policy statement contains no exposition of the pre existing regulatory controls and social responsibility obligations already placed on operators.

Most of the risks articulated in this document are already mitigated by the existing regulatory regime and the Authority should not seek to impose additional conditions (outwith the mandatory and default conditions unless there are clear reasons to do so).

Our detailed comments are set out below:

Location (page 8) - *The Council is also aware that in certain areas of the borough, whether it be for commercial reasons or by coincidence, clustering of licensed gambling premises, specifically*

betting shops, has seemingly occurred since the Gambling Act 2005 came into being. Where it is apparent that clustering of licensed premises has occurred, the Council is mindful to ensure that that has not nor does not have a negative impact on the three licensing objectives and as a result, the local community.

Clustering of betting shops is a natural consequence of the market liberalisation granted under the Gambling Act 2005 (as a quid pro quo for increased levels of social regulation). It would be unlawful under the Act to place obligations on operators to consider the risks of clustering per se. This matter falls to be considered under planning legislation and the law and guidance is clear that planning and licensing issues should not be conflated. This is a clear example of the authority attempting to draft an exclusionary policy, to reverse the burden of proof and to undermine the aim to permit principle.

We actually favour a “cumulative impact” test, but it does not exist in law and cannot be imposed through this policy.

The Council will expect operators to assess the existing density of licensed gambling premises in the area local to their licensed or application premises and assess any negative impact their premises may have in that area.

They do state earlier that: **Location - The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can be.**

As above this paragraph is a clear attempt to circumvent the legislation and reverse the burden of proof. If the authority have clear evidence of apparent risk (as opposed to theoretical risk) in this area, they should publish the empirical evidence as part of the local area profile.

Page 10 (crime and disorder) - The Guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Therefore, where an area has known high levels of organised crime this authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable.

The Authority are reminded that they should not operate an exclusionary policy and that matters need to be evidence led. The Authority should also take care not to apply too wide an application of the Crime and Disorder Objective. The authority is respectfully reminded that “nuisance” is not the subject of a licensing objective.

Page 13 - Door Supervisors – this Council notes that licensing authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protecting children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime. Whilst there is currently no apparent evidence that the operation of betting offices requires door supervisors for the protection of the public, this authority will consider making a door supervision requirement with regard to a betting office if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and/or that door supervision is both necessary and proportionate.

Betting operators have clear obligations under the law and the operation of “Think 21” policies are generally effective. William Hill has a Primary Authority partnership with Westminster City Council

for age restricted products. Our experience is that door supervisors are an ineffective way of protecting the Licensing Objectives and they have no authority to police the street.

Page 17 Crime and disorder - Where two or more Betting shops are sited in a neighbourhood shopping area or town centre, the Licensing Authority considers it appropriate that the managers of each shop meet with the local police and representatives of the other Responsible Authorities on at least a quarterly basis to discuss local crime and disorder problems and certain individuals that persistently cause crime and disorder in Gambling Premises. The Licensing Authority also considers the Safer Croydon Radio scheme is an essential and effective measure for supporting the 'Crime and Disorder' Licensing Objective. It considers it appropriate that Gambling Premises belong to the scheme and train staff to use the radios to prevent and deter crime and disorder. The Licensing Authority considers that the sharing of information as above and membership of the Safer Croydon Radio scheme combined can actively reduce the risk of crime and disorder associated with betting shops.

This reference is we believe a clear abuse of process. This is a clear attempt to impose a collective licensing condition here in respect of what should be a voluntary arrangement between operators and the authorities. We welcome voluntary schemes such as "Betwatch", but operators are entitled to make their own evaluation of the effectiveness of schemes and this policy document should not be used to impose additional costs on operators. This onerous requirement needs to be removed.

Andrew Lyman
Director of Group Regulatory Affairs

T: +44 (0) 20 8918 3920
M: +44 (0) 7885 559 131
E: alyman@williamhill.co.uk

William Hill Organization, Greenside House, 50 Station Road, Wood Green, London N22 7TP



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