

# GAMBLING COMMISSION

## **Guidance to Licensing Authorities** **5<sup>th</sup> Edition**

**Responses, September 2015**

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# 1 Introduction

- 1.1** Under section 25 of the Gambling Act 2005 (the Act), the Commission is required to issue guidance to Licensing Authorities from time to time, and to consult on the Guidance before it is issued. In March 2015, the Gambling Commission (the Commission) published a consultation paper setting out our proposals for the 5th edition of the Guidance to Licensing Authorities (the Guidance). The consultation was open for 12 weeks and closed on 22 June 2015.
- 1.2** There were a total of 30 responses to the consultation of which three were identical responses received from one respondent representing three different organisations. For the purposes of numerical analysis, these three responses have been recorded as one response throughout this document. In other cases, essentially similar views concerning a specific topic had been expressed several times against different consultation questions. In order to avoid duplication the Commission has set out its position to these responses under the most appropriate question. For example, a number of respondents submitted comments concerning local area profiles under Questions 5, 6 and 7 of the consultation document. Where appropriate we have summarised these responses under Question 9, in which views were invited as to whether *there any additional benefits, or any drawbacks, in licensing authorities undertaking a local area profile?*
- 1.3** The Commission would like to thank those stakeholders who responded to the consultation for taking the time to do so. This document aims to reflect the views offered, but it does not purport to describe all of the responses in detail. The Commission has given careful consideration to the consultation responses before finalising its policy position.
- 1.4** The final Guidance will be published in September along with supplementary materials including case studies, letter templates and sample conditions on the Commission's website. These will be regularly updated to illustrate how LAs have used their powers to address the local regulation of gambling.

## 2 Issues and responses to the paper

### Specific but minor changes to the Guidance

#### Consultation question

Q1. Do you have any comments on the changes highlighted in paragraph 2.3?

#### Consultation proposals

**2.1** The Guidance has been amended to reference additional or newly available material and to provide updates on changes to legislation and terminology. This section drew attention to a number of specific changes, for example: references to the recently updated LCCP published in February 2015, reference to the new Regulators' Code (previously Regulators' Compliance Code), information that is now available on the Commission's website (eg statutory notices and application forms for licensing authorities), the removal of s.180 of the Act which has now lapsed and has been removed and reference to the Commission's additional advice notes such as *What Constitutes Bingo* and *The Role of Authorised Persons in Scotland*.

**2.2** The majority of the proposed revisions to the 5th edition of the Guidance were intended to ensure the Guidance remains current and ordered in a manner that facilitates ease of reference. The Commission was interested in hearing stakeholder views on these specific but minor changes.

#### Respondents' views

**2.3** The Commission received a total of eight responses to this question from a mix of industry and LA respondents. Two LAs and one operator stated that they broadly or wholly welcomed these specific changes to the Guidance.

**2.4** One operator made the point that the Guidance as a whole should be in line with the Regulators' Code and that LAs should adhere to the Regulators' Code, and that "aim to permit" should remain the overriding consideration. One respondent queried the wording in paragraph 6.7 of the GLA, which stated that LAs "...have a duty to pursue the licensing objectives..." The respondent indicated that this function had no statutory basis within the Act and should be corrected.

**2.5** Four industry respondents (two operators and two trade associations) shared the view that the revisions would appear to increase general bureaucracy and detract from the 'aim to permit' principle. Two LAs and one other stakeholder echoed the sentiment that it may be necessary to further reiterate the focus on aim to permit.

**2.6** One stakeholder criticised the tone of the Guidance, noting that the Commission did not appear to be adhering to the Government policy in favour of deregulation and cutting of "red tape". A trade association stated that they would welcome any drafting that encouraged consistency across LAs.

**2.7** One trade association stated that the Guidance should offer further clarity on the requirement for Occasional Use Notices (OUNs) to be issued to licensed gambling operators only. A further two industry respondents (one trade association and one operator) queried the reference made to the Commission's *What constitutes bingo?* advice note on the basis that, as with other advice notes, the guidance and contents of the document did not represent a definitive legal position.

## **The Commission's position**

### **Regulators' code and aim to permit**

The Commission agrees that the aim to permit framework and the principles outlined within the Regulators' Code should remain a key consideration within the Guidance. The revised Guidance reinforces the requirement that LAs permit gambling so far as applications are considered to be in accordance with relevant code(s) of practice and any relevant guidance issued by the Commission; reasonably consistent with licensing objectives and in accordance with their statements of policy and. The Guidance also seeks to encourage proactive engagement between LAs and local operators to mitigate the risk to licensing objectives and reduce the likelihood of future enforcement action. These aims accord with the Regulators' Code in promoting efficient and effective approach to regulation and enforcement. The Regulators' Code is referenced multiple times throughout the revised guidance, with paragraph 5.27 making explicit the Commission's regard to the Code's requirements.

The aim to permit principle is framed within the context of the LAs functions as set out s153 of the Act. The Commission notes the comment made in relation to paragraph 6.7 and removed reference of a *duty to pursue* from this and other instances where it appeared in the Guidance.

### **Licensed operators and OUNs**

The Commission has updated the relevant sections of the Guidance to reinforce the requirement that an applicant for an OUN must be licensed by the Commission.

### **Commission advice notes and quick guides**

Some responses commented that the Commission's advice notes do not constitute a definitive legal position and should not, for this reason, be referenced within the Guidance. The Commission considers there to be merit in referencing advice notes and quick guides, which help to explain a number of complicated matters. Some of these documents have been subject to lengthy consultation with the industry. Nonetheless, we accept that, where advice notes and quick guides are cited, it should be made clear that such documents do not form a part of the Guidance.

Having considered the responses to this question, the Commission will proceed to implement the changes highlighted above into the Guidance.

## Specific and substantive changes to the Guidance

### Revisions to part 1: General guidance on the role and responsibilities of licensing authorities in gambling regulation

#### Consultation question

Q2. Do you consider that the revisions to Part 1 better reflect the role of licensing authorities in the local regulation of gambling? Are there any other observations you wish to make?

#### Consultation proposals

- 2.8** The revisions made to Part 1 of the Guidance were intended to provide greater clarity as to the powers afforded to LAs under s.153 of the Act, to allow for more effective local regulation of gambling. A key driver for this consultation was to set out the significant scope available to LAs to mitigate the risks associated with local gambling provision, and highlight the discretion afforded to LAs within the context of the ‘aim to permit’ framework.
- 2.9** The Commission sought views as to whether the revisions provided greater clarity on the role of LAs as defined under the Act.

#### Respondents’ views

- 2.10** There were a total of 27 responses to this question. Nine respondents (eight LAs and one stakeholder) agreed that the revisions to Part 1 did better reflect the role of LAs. Three LAs stated that the changes did not provide sufficient clarity, and a further two LAs mentioned that the ability for LAs to practice “broad discretion” would be increasingly difficult in absence of reliable local evidence.
- 2.11** Two Scottish LAs and one other respondent, noted that the anomaly that prevented Scottish licensing standards officers from inspecting and enforcing conditions upon gambling premises was not due to be corrected by the Air Weapon Bill, as suggested by the consultation document.
- 2.12** One operator and two trade associations expressed significant concern that LAs might be encouraged to request sight of an operator’s business plan. They considered this information to be commercially sensitive, and, in the respondents’ view, irrelevant in regard to the licensing objectives, and would represent a significant overreach. Three operators expressed a concern that “open-ended” requests from LAs for additional information would add significantly to “red tape”.
- 2.13** A query was raised by two respondents, and echoed by others elsewhere, regarding the removal of paragraph 1.20 from the 5th edition of the Guidance, which referred to the need to ensure ‘*consistency across licensing authorities about the manner in which functions under the Act are carried out*’. These respondents queried the reasoning behind this omission and suggested that the paragraph be reinstated. The general consensus amongst these respondents was that paragraph 1.20 deterred LAs from imposing excessive unreasonable conditions.
- 2.14** Two trade associations raised concerns that operators may be left in a position where there are significantly divergent standards across different LA areas, and suggested that this would have a disproportionately burdensome affect on their smaller members.

- 2.15** A number of respondents (including two LAs and two trade associations) emphasised the benefits of maintaining effective co-operation between LAs and the industry, especially within the context of tighter restrictions on LA budgets.
- 2.16** Several trade associations expressed a concern that their sectors were facing disproportionately excessive regulation, particularly when considered in conjunction with the type of gambling their members offered.

## **The Commission's position**

### **Local evidence**

Comments concerning the 'absence of local evidence' and the powers afforded to LAs under s153 are addressed in paragraph 2.48 of this document.

### **Air Weapon Bill**

The reference to the Air Weapon Bill has been removed. The Guidance refers instead to the Smith Commission report, which includes proposals about licensing boards and gambling powers.

### **Business plans**

Some correspondents expressed concern as to whether an LA, in exercising its functions under s153, has cause to request a copy of an operator's Business Plan. The Gambling Act 2005 (Premises Licences and Provisional Statements) (England and Wales) and (Scotland) Regulations 2007 sets out what the operator needs to supply, as a *minimum*. It is important to note, however, that this minimum requirement may or may not satisfy a licensing authority in discharging its functions as set out at s153 of the Act. Precisely what information is required will depend on individual circumstances. While we do not envisage that in the vast majority of circumstances licensing authorities will need to see a business plan, they may wish to understand the nature of the business for which they are granting a premises licence. We are expecting that responsible businesses will wish to assist licensing authorities as far as possible in their decision-making processes. Such requests (for a business plan) will be by exception rather than as a normal requirement, however, in particularly contentious cases they have already been shown to be a useful piece of information in enabling the LA to arrive at its conclusions regarding a premises application.

The Guidance encourages LAs to ensure its concerns are risk based. The aim of the Guidance is to encourage engagement between LAs and operators from an early stage and have a clear understanding of local concerns from the outset, which should reduce burdens and costs on both parties.

### **Consistency**

Two respondents queried the removal of paragraph 1.20, which in the 4th edition of the Guidance had set out the Commission's intention that, *where appropriate, there should be consistency across the licensing authorities about the manner in which functions under the Act are carried out*. The new version of the Guidance continues to encourage consistency of *approach* by LAs to gambling regulation, whilst at the same time recognising that local circumstances will vary and this will be reflected in such matters as the statement of policy and the local area profile.

## **Risk and gambling activity**

Some responses queried whether different forms of gambling should be subject to the same levels of local regulation given the varying degrees of risk associated to different premises. The Commission's considers that risk is not solely determined by the form of gambling being offered in a particular premises but also by other issues such as the area in which a premises is located and the measures an operator has taken to mitigate risk within that premises. Risk to the third licensing objective – children and vulnerable people – is not necessarily related to matters such as the stake and prize limits of machines within those premises. A wider range of factors must be taken into account to ensure risks are mitigated. It would therefore be inappropriate to predetermine different forms of regulation for different forms of gambling.

## **Revisions to Part 3: The Gambling Commission**

### **Consultation question**

Q3. Do the revisions to Part 3 clearly set out the relationship between the Commission and licensing authorities? Are further amendments necessary to improve understanding?

### **Consultation proposals**

- 2.17** The Commission proposed amendments to Part 3 of the Guidance to demonstrate how the collaborative approach to gambling regulation, through partnership working between the Commission and LAs is being achieved. The revisions allowed for some insight into how proactive engagement between the Commission and its regulatory partners has facilitated this approach.
- 2.18** The Commission was keen to find out whether these amendments had provided a greater understanding of the relationship between the Commission and LAs.

### **Respondents' views**

- 2.19** The Commission received 25 responses to this question, from a variety of LAs and stakeholders. Nine respondents (eight of whom were LAs) agreed that the revisions to Part 3 did clearly set out the relationship between the Commission and LAs.
- 2.20** The majority of industry respondents were concerned to some degree about the division of responsibilities between the Commission and LAs. Some suggested that the Commission had overstepped the line between providing guidance to LAs and getting involved directly with premises licensing policy. A similar concern suggested the proposed new Guidance was blurring the distinction between the operating and premises licensing regimes and a suggestion that the distinction between the Commission's and LAs licensing regimes should be maintained.
- 2.21** One trade association reiterated its view that there are benefits of co-operation between the Commission, LAs, and the gambling industry; given the reliance of regulatory bodies (ie LAs and the Commission) on the industry to educate them of the risks and operations of the industry, that regulation should be driven by evidence, and that there should be a greater focus on sharing best practice between regulators.



## The Commission's position

### Division of powers

The Commission does not agree that the Guidance 'oversteps the line' in relation to the division of regulatory powers. As with previous iterations, the Guidance constitutes the Commission's principle guidance document to LAs. Part 3 of the revised Guidance sets out the Commission's role, under Section 25 (1) of the Act, to issue guidance as to –

- (a) The manner in which local authorities are to exercise their functions under this Act, and
- (b) In particular the principles to be applied by local authorities in exercising functions under the Act.

The Guidance aims to provide a clear overview of the powers afforded to LAs under s153 and does not seek to replace or amend the powers afforded to LAs under the Act. Part 5 of the Guidance sets out LA responsibilities with regards to the licensing objectives. This section of the Guidance also details those areas that the Commission and LAs, when relevant, could, work collaboratively to resolve specific issues. Paragraph 1.4 of the Guidance states that the licensing of premises is primarily a matter for local determination, and is something which the Commission is unlikely to comment on, save where it is important to establish principle and precedent.

### Sharing case studies

The Commission has shared case studies amongst LAs for a number of years through the monthly LA bulletin and elsewhere and will continue to do so. Alongside the Guidance, supplementary materials will be made available on the Commission's website including case law, sample conditions, letter templates and examples of circumstances in which LAs have made effective use of their powers under the Act.

## Revisions to Part 5: Principles to be applied by licensing authorities

### Consultation question

Q4. Do the revisions to Part 5 offer greater clarity on the role and responsibilities of licensing authorities in their decision making relating to local gambling regulation? Do you have any other comments or observations on the amendments?

### Consultation proposals

- 2.22** The proposed revisions to Part 5 of the Guidance seek to encourage greater collaborative working between LAs and local gambling operators, and our expectation that they work together to mitigate risks. The section also provides further details on aspects of section s153 such as the licensing objectives and the Commission's codes of practice.

### Respondents' views

- 2.23** There were a total of 24 responses to this question. Eight respondents (seven LAs plus one other stakeholder) agreed that the revisions offered greater clarity on the roles and responsibilities of LAs in relation to local gambling regulation.

- 2.24** Many of the responses reiterated points made in relation to other questions and therefore the Commission's position is not repeated in this section.
- 2.25** Other views expressed by LAs included support for the sections regarding single staffing and protection of children and vulnerable people. There was also concern that the 'broad discretion' available to LAs may not be available in practice. One respondent queried what the process was in the event of an immediate premises licence review where a LA also has concerns around an operator's suitability.
- 2.26** One respondent requested greater clarity around products that use imagery that might appeal to children, where these are situated in or near age-restricted gambling premises or parts of premises.

## **The Commission's position**

### **The role and responsibilities of LAs**

The Commission is satisfied that the revisions to Part 5 provide greater clarity as to the roles and responsibilities of LAs in regulating local gambling provision

### **Suitability of applicants**

Where LAs have concerns about the suitability of an operator these should be raised with the Commission as soon as possible, whilst at the same time exercising their powers in relation to the premises.

### **Advertising/imagery appealing to children**

Additional information has been added to Part 7 of the Guidance about the use of imagery by operators that may appeal to children.

## **Revisions to Part 6: Licensing Authority Policy Statement**

### **Consultation proposals**

#### **Consultation question**

Q5. Do the revisions to Part 6 give a clear overview of the expectations of licensing authorities' policy statements?

- 2.27** The statement of policy is key to informing a LA's overall approach to applications, compliance and enforcement. The revised Guidance makes it clear that an effective statement should be shaped by local circumstances and local risks, and should clearly express the licensing authority's approach to regulation against this backdrop. The statement of policy should also remain responsive to emerging risks and can be reviewed at any time, but must be reviewed at least every three years.
- 2.28** The existence of a clear and robust statement of policy gives greater scope for partnership working with local businesses, communities, and responsible authorities in identifying and mitigating local risks to the licensing objectives. It is also an opportunity to set out expectations for premises licence applications and can include the level and type of information and documentation that the LA may require applicants.

- 2.29** The Guidance reinforces the Commission’s view that a statement of policy which clearly sets out a LA’s approach to regulation with reference to local risks will facilitate better understanding of the local environment and enable operators to proactively mitigate risks to the licensing objectives.
- 2.30** The Commission sought views as to whether these revisions made clearer the expectation of LA statements of policy.

## **Respondents’ views**

- 2.31** The Commission received a total of 27 responses to this question. Seven LAs and two other stakeholders agreed that the revisions gave a clear overview of the expectations of LAs’ statements of policy. Three LAs however expressed the view that it would be difficult in practice to obtain the local-level evidence needed to support their statements, and noted that it would be improper to extrapolate local conclusions from research that had been conducted on a national level.
- 2.32** Other responses included an opinion that responses to LA consultations should be the primary source of evidence for risks in an area; that a lack of responses during consultation could be taken as proof of a lack of risks; and a desire for more detailed templates to be provided by the Commission.
- 2.33** Three industry respondents (two trade associations and one operator) expressed the view that the obligation to consult with “persons who appear to the authority to represent the interests of persons carrying on gambling businesses” should be reiterated to LAs.

## **The Commission’s position**

### **Collation of local evidence**

A number of responses commented on the availability of local data available to LAs. A principle aim of the Guidance is to promote proactive engagement with local groups whose input may enhance awareness of local risks. The Commission recognises, however, that priorities will differ across LAs and that local agendas will be informed by circumstances unique to each area. The attention given to gambling related issues will remain a matter of local determination and will inevitably need to be balanced against other local priorities. Whilst the Guidance does not seek to provide an exhaustive list, these groups may include the Child Safeguarding Board, local faith groups, charities, public agencies (eg the police), and businesses. The LA could also draw upon information gathered during compliance work (eg inspections, complaints or intelligence) and the intelligence held by other local authority departments.

### **National Research**

Some of the responses asked whether it would be appropriate, or indeed practical, for statements of policy to draw upon the conclusions of national research. Whilst the Guidance will not make specific reference to a particular piece of work, there may be circumstances in which the findings contained in national research offer a useful framework for local risk analysis. The Commission will continue to publish details of this work through the usual channels (eg LA Bulletin).

## Consultation question

Q6. Are there any further revisions to Part 6 which would improve the effectiveness of statement of policy?

- 2.34** There were a total of 17 responses to this question of which some made suggestions for further revisions to Part 6 of the Guidance. Two LAs and a trade association suggested that more concrete guidance should be given as to how an LA might source the evidence needed to make an informed decision.
- 2.35** Three LAs requested that further clarification be given as to the relationship between alcohol and gambling licensing, and how far issues with gambling operators could practically be dealt with through the alcohol licensing regime.
- 2.36** Other views expressed by respondents included a request for clarification on the role of law enforcement organisations; a suggestion that more encouragement should be offered for LAs to engage with charities, treatment providers and other stakeholders; that LAs should be guided to consider the impact of rejecting premises applications for gamblers who are not a risk of harm (ie reducing competition in the local market); and a strong suggestion from a trade association that LAs ought to be more firmly pressed to provide the lists of responsible authorities to operators on request.

## The Commission's position

### Gambling and alcohol licensed regimes

There was some suggestion that the Guidance ought to provide further information on the relationship between gambling and alcohol licensed regimes. The relationship between the Licensing Act 2003, the Licensing (Scotland) Act 2005 and Gambling Act 2005 is referred to in various sections of the Guidance, particularly where there is a degree of overlap between the two areas of legislation. For further advice on the powers afforded under differently licensing regimes stakeholders should refer to the appropriate guidance. For example, with regards to alcohol licensing, the Home Office has published separate guidance on the powers afforded to LAs under the Licensing Act<sup>1</sup>.

Where it appears that new or existing legislation does overlap with Gambling Act the Commission will publish updates via the usual channels eg LA Bulletin.

### Responsible authorities

Proactive engagement and transparency between LAs and operators is a key theme of this consultation. The Commission agrees, therefore, that LAs should be willing to share details of responsible authorities upon request and will encourage LAs to do so in the Guidance, though this will depend largely on local discretion and is not an enforceable requirement. Many LAs already include this information in their statements of policy.

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<sup>1</sup> Amended Guidance Issued Under Section 182 of the Licensing Act 2003

## Consultation question

Q7. Are there other areas which the Guidance should detail for inclusion in licensing authority statements of policy?

- 2.37** The Commission received a total of eight responses to this question; with various further suggestions about what ought to be included in an LA statement of policy. Of the suggestions made, the most popular came from three industry respondents (two trade associations and one operator), who requested that the Guidance reiterate the responsibility on LAs to ensure the statistical information provided to the Commission within their annual returns are as accurate as possible.
- 2.38** One further LA view was that the Guidance should provide greater detail on local factors that would need special consideration and address within a LAs statement of policy.

## The Commission's position

### Annual returns

The Commission notes the suggestion that LAs are reminded to submit accurate information within their annual returns, but considers this to be sufficiently covered in Part 13 of the Guidance. The Commission also reminds LAs, prior to final submission, of the need to ensure the accuracy of data included within annual returns, and that the data is published in an annual report.

### Statement of licensing policy

It would not be appropriate for the specify the local factors that LAs might need to take into account in developing its statement of policy, examples of issues that may be unique to a local area are provided in Part 6 of the Guidance for illustrative purposes.

## Risk Assessments by operators

### Consultation question

Q8. Does part 6 sufficiently explain the impact of the new code provisions relating to operators' risk assessments, when considering licensing authorities' statements of policy?

## Consultation proposals

- 2.39** The new Licence Conditions and Codes of Practice (LCCP) introduced a new social responsibility code (SR code 10.1.1) which will require operators to conduct a local risk assessment in order to understand the risks associated with the areas in which they have, or wish to have, a gambling premises. This SR code, which comes into force on 6 April 2016, also requires operators to put in place policies and procedures designed to mitigate these risks.
- 2.40** The Commission sought views as to whether the revisions to Part 6 sufficiently explained the impact of the new code on LAs statements of policy.

## Respondents' views

- 2.41** There were a total of 21 responses to this question, of which nine LAs agreed that Part 6 did sufficiently explain the impact of the new code provisions.
- 2.42** Three industry respondents (one trade association and two operators) suggested that the Guidance should make clear that LAs are not to be in a position where they can prescribe to operators the format of their local risk assessments, as long as the local risk assessments are fit for purpose and meet the minimum requirements set out.
- 2.43** Two industry respondents requested that more concrete guidance is given on what is meant by 'significant' and 'material' changes in regards to local areas and premises layouts respectively. Industry respondents also requested that the Guidance makes it clear that only a significant change to the local environment would trigger a revision to the risk assessment.
- 2.44** One LA suggested that LAs should have more power to compel operators to provide their local risk assessment.

### The Commission's position

#### Format of operator's risks assessments

Some of the respondents suggested that the Guidance should deter LAs from prescribing the format of the operator's local risk assessment. The Commission would expect the operator's risk assessment to be structured in a manner that offers sufficient assurance that a premises has suitable controls and procedures in place. These controls should reflect the level of risk within a particular area, which will be determined by local circumstances. The operator's risk assessment should take into account the physical risks presented by the local landscape, such as the premises' exposure to particular vulnerable groups. An LA would be expected to challenge an operator's risk assessment where it can be evidenced that there are local risks that the operator has failed to take into consideration.

The requirement for operators to submit risk assessment is not intended as a bureaucratic exercise. Rather, the aim of the Guidance is to enable operators and LAs to engage in constructive dialogue at an early stage, reducing the likelihood of costly enforcement action at a later date. Whilst there is no statutory requirement for licensees to share their risk assessments with responsible authorities or interested parties, it can save considerable time and expense if they do so, as well as increasing the confidence of those agencies as to the operator's awareness of their obligations.

The Commission considers that the publication of a template local risk assessment would impose unnecessary rigidity to an exercise that is intended to promote greater transparency and accountability at a local level. What we intend to do, however, is continue to facilitate the sharing of case studies across the LA community.

#### Significant and material changes

The Guidance does not seek to define the term 'significant change', which the Commission considers is a concept that is best determined at a local level.

Both the LCCP (SR Code 10.1.1) and the Guidance (paragraphs 6.43 and 6.45) set out the circumstances in which operators must share their risk assessment with the LAs. LAs can also set out in their statements of policy the circumstances in which they would expect to see the risk assessment when, for example, inspecting a premises.



## Risk assessments by licensing authorities (local area profiles)

### Consultation proposals

#### Consultation question

Q9. Does Part 6 offer sufficient clarity on the purpose of assessing the risk profile of specific areas within a locality? Are there any additional benefits, or any drawbacks, in licensing authorities undertaking a local area profile?

- 2.45** The consultation document acknowledged the familiarity LAs have with a risk-based approach to compliance, whereby resources and efforts are to be targeted at areas of higher risk. To provide greater clarity around this, Part 6 of the Guidance was amended to include a new section on 'local area profiles'. These profiles are simply a way for LAs to process and gather information to identify areas within their localities that are of particular concern and greater risk; and to then underpin their approach for dealing with these areas in their statement of policy. It would also serve the purpose of giving clarity to operators as to the LA's view of risk. The proposed amendments to Part 6 provided information on local area profiles and their usage.
- 2.46** The revisions also place greater emphasis on the need for ongoing engagement between LAs and other prescribed statutory bodies, including responsible authorities, to draw upon their expertise and knowledge when developing local area profiles.

#### Respondents' views

- 2.47** The Commission received a total of 26 responses to this question. Ten respondents (comprising of eight LAs, and two other stakeholders) agreed that Part 6 offered sufficient clarity on the purpose of assessing the risk profile of areas within localities.
- 2.48** Two LAs expressed support for the use of local area profiles and local risk assessments, as they felt that both of these tools would help inform their statements of policy, particularly in areas where there are risks posed to vulnerable populations.
- 2.49** Four LA respondents suggested that further guidance and/or 'Commission approved' templates be provided.
- 2.50** Several respondents asked for clarification as to where evidence could be sourced, and under what circumstances engagement with other organisations should be made. One LA and another stakeholder raised the concern that engaging with other responsible authorities may prove difficult at a time when, due to budgetary pressures, many organisations are focusing on their own core activities at the expense of cross-organisational co-operation. One operator suggested that local area profiles should not be used to support a pre-judged outcome to a premises application.
- 2.51** Some industry respondents suggest that LAs should be guided to assess their local risks in as 'concrete' a manner as possible, without resorting to vague 'concerns' or 'perceived risks', which can (in the respondents' views) often be a cover for prejudice. Other responses reiterated the view that that local area profiles should be based on evidence, and not perceived or theoretical risk.
- 2.52.** Three industry respondents expressed concern that some LAs may seek to use local area profiles to implement a 'backdoor' restriction on premises 'clustering'. One operator and one LA suggested that rather than a broad roll-out, there should be a structured trial period for the implementation of local area profiles to take place within one locality. Another view expressed by a LA respondent was that the Guidance should reinforce the circumstances in which an LA elects to amend its local area profile in the future, as this may also trigger engagement with operators regarding the effectiveness of existing procedures and controls.

## The Commission's position

### Local area profile template

In response to the suggestion that the Guidance provides templates for key documents, it should be noted that the local area profile refers to a *process* in which LAs map out the key characteristics of a particular area. The information gathered during this process can be used to inform both LAs and operators of the key areas of risk within the locality. The Commission notes that the process by which this information is obtained will depend on local circumstances. The Guidance does not therefore seek to set out a pre-determined approach, but instead offers LAs a level of flexibility to develop a framework that reflects the local landscape.

To give the maximum opportunity for LAs to manage local gambling provision in the way that makes most sense to them in the light of local circumstances, we do not intend to place formal constraints on the information that LAs should take into account when assessing risk across their areas, and therefore will not be producing a template for local area profiles. What we intend to do, however, is continue to facilitate the sharing of case studies across the LA community.

### Costs/resources

Some responses suggested that not all LAs will have time or resources to develop a profile of local characteristics. While the development of a local area profile is not a mandatory requirement, the Commission considers it may be a useful tool in reducing licensing, compliance and enforcement costs. Area profiles will be more suited to some LAs than others and the Commission encourages LAs to engage with the responsible authorities, who have statutory roles under to the Act, when developing their area profiles as they will have information that can inform the profile. Equally the expertise and knowledge of local businesses and community groups for example could be sought as part of the area profile process.

### Sources of evidence

Part 6 of the Guidance sets out the principles upon which this data collection method should be based explaining that LAs are '*likely to take account of a wide range of factors, data and information held by the licensing authority and its partners*'. The Commission recognises that LAs are best placed to engage with local businesses, schools, charities etc, so as to better understand potential risks to the licensing objectives.

### Engagement triggers/'significant changes'

The development of a local area profile is an iterative process which may be reviewed to reflect significant changes to the local landscape. LAs are best placed to manage local gambling provision in the way that makes most sense to them in the light of local (changing) circumstances and their assessment of local risk, and as such we do not intend to place formal constraints on LAs by defining in the Guidance what would constitute a "significant change" in how LAs manage their local gambling provision.

### Local 'concerns' and 'perceived risk'

The Guidance referred to 'concerns' and 'perceived risk' that LAs might take into account when determining a premises licence. For clarity we have changed such references (notably within Part 6) to refer to local risks to the licensing objectives, with LAs aware that these need to be evidence based. However, it is important to note that the Commission's defines risks "*not necessarily related to an event that has happened [but] related to the probability of an event happening and the likely impact of that event – in this case on (the) licensing objectives*".



## Clustering

A number of respondents expressed concern that LAs may use the statement of policy and/or their local area profile as a vehicle to attempt to prevent clustering of gambling premises. S153 (2) of the Act prevents LAs from regulating based on the expected demand for facilities and this is reiterated several times throughout the Guidance (specifically paragraphs 1.36 and 5.22).

## Local area profiles - trial period

The Commission does not intend to roll-out the use of local area profiles on a trial basis. As stated above, local area profiles are not a mandatory requirement and the decision to pursue this approach will be a matter of local discretion.

## Revisions to part 7: Premises licences

### Consultation question

Q10. Do the revisions to Part 7 provide sufficient clarity on the meaning of 'premises' and other issues such as access, to facilitate decision making in relation to premises licences?

### Consultation proposals

- 2.54** The revisions to Part 7 of the Guidance were made to give greater clarity on the meaning of the term 'premises' and related issues such as access to premises and premises offering a range of gambling activities under relevant permissions. It intends to set out clearly the information that LAs may choose to consider when determining the outcome of premises licence applications.

### Respondents' views

- 2.55** There were a total of 25 responses received to this question, the vast majority of respondents agreed that the revisions provided sufficient clarity on the issues addressed.
- 2.56** Five industry respondents (three trade associations and two operators) expressed the view that it would be disproportionate for LAs to request that premises plans include details of where machines are sited, and/or lines of sight between staff and customers.
- 2.57** Two industry respondents (one operator and one trade association), plus one LA expressed the view that the guidance that age-restricted premises should only be accessible from the street was counter-productive. This point was made specifically in relation to the Commission's position that Adult Gaming Centre (AGC) should not be located at the back of Family Entertainment Centre. The LA respondent suggested that age verification processes may be more effective when the player has to walk through the full length of the FEC area to reach the threshold of the AGC, while the industry respondents were of the view that the Commission should leave such issues to the discretion of the LAs.
- 2.58** Three industry respondents (two trade associations and one operator) raised concerns regarding the inclusion of the concept of "primary activity", arguing that there was no legal basis for requiring certain operators to ensure machine gaming remains ancillary to the other forms of gambling they offer. The same respondents also requested that the phrase "machine shed" be removed, on the basis that they believed it to be overly emotive.

- 2.59** One trade association requested that it be reiterated that not all gambling is age restricted, and that LAs should bear this in mind when assessing FEC premises. The same respondent queried wording of paragraph 7.30 which appeared to imply that children were prohibited from “closely observing” all forms of gambling. The respondent noted that the enforcement of such a prohibition would be highly impractical.
- 2.60** Two respondents (one LA and stakeholder) requested further emphasis be made on the point that premises should not be ‘separated’ by means of temporary fittings, such as rope barriers.

## **The Commission’s position**

### **Location of gaming machines**

The Commission considers that the location of machines and/or line of sight between staff and customers is likely to be important and relevant information for LAs to request when considering applications. In determining an application for a premises licence, or an application to vary a premises licence, the LA must establish whether the application is ‘in accordance with the relevant code of practice’. Social Responsibility code 3.2.1 (2) for example requires that licensees *must ensure that their policies and procedures take account of the structure and layout of their gambling premises*.

The LA must also determine whether the application is ‘reasonably consistent with the licensing objectives’ - such as protecting the young and vulnerable. The Gambling Act 2005 (Premises Licences and Provisional Statements) (England and Wales) and (Scotland) Regulations 2007 set out what the operator needs to supply as a minimum. However this minimum requirement may or may not satisfy a licensing authority in discharging its functions as set out at s153 of the Act. Local circumstances and concerns and the layout of a particular premises may well determine what is most appropriate for an individual application. While we do not envisage that in the vast majority of circumstances authorities will need to see a detailed premises plans showing the location of machines, it is likely that LAs will want to fully understand the layout of premises in order to be able to make an effective judgement about the likely consistency with the licensing objectives. We are expecting that responsible businesses will wish to assist LAs as far as possible in their decision-making processes, and be willing to share this sort of information.

### **Access to premises**

Some respondents queried the requirement that age restricted premises should only be accessible from the street. The Guidance provided is based on the mandatory licence condition in relation to the need to avoid artificial separation of premises which carry separate machine entitlements. Paragraph 7.5 of the Guidance states that *‘the different parts of the building can reasonably be regarded as being different premises’*. In order to be properly regarded as a separate, therefore, there should be a clear divide between premises, including separate access points.

### **‘Machine-shed’**

Some respondents considered the term ‘machine shed’ to be overly-emotive and the Commission has decided to remove this term from the paragraph 7.19 of the Guidance.

### **‘Primary activity’**

The term “primary activity” refers to the current drafting of Licence Condition 16. The Commission intends to consult on the current drafting of this licence condition in due course. In the mean time the current condition still has effect and operators must adhere to the licence condition.

### **Children observing gambling**

The Commission has noted the comment made in relation to the wording of paragraph 7.30. It has been amended and now reads: *premises should be configured so that children are not invited to participate in, have accidental access to, or closely observe gambling **where they are prohibited from participating***. The final part of this sentence – highlighted in bold- was removed from the draft Guidance in error and will be reinstated for the final version.

### **Temporary fittings**

Part 7 of the Guidance defines what constitutes a premises in considerable detail and the Commission does not consider it necessary to place further emphasises on its position with regard to artificial barriers. Paragraph 7.7, specifically, states that the Commission does not recognise that *'areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises'*.

## Revisions to part 9: Premises licence conditions

### Consultation question

Q11. Do the amendments to Part 9 clearly set out the circumstances in which licensing authorities may attach conditions to premises licences?

### Consultation proposals

- 2.62** The revisions to Part 9 intended to reinforce the circumstances in which LAs may attach conditions to a premises licence. A non-exhaustive list of premises licence conditions were appended to the Guidance (Appendix F) for illustrative purposes to demonstrate some of the measures that LAs have adopted to manage local gambling provision.
- 2.63** The revisions also sought to promote more constructive dialogue between the LA and operator, particularly with reference to the statement of policy and view of local risks, prior to formally discharging its powers under s.153.
- 2.64** The Commission sought views on whether the amendments clearly set out the circumstances under which conditions may be attached to premises licences and sought further views on Appendix F.

### Respondents' views

- 2.65** There were 25 responses to this question. Approximately half of these (from LAs) agreed that the amendments clearly set out the circumstances in which LAs may attach conditions to premises licences. This contrasted to the view expressed by nine industry stakeholders who disagreed and were of the opinion that the overriding message that ought to be put to LAs is that additional conditions should only be applied if they can be evidenced to be 'relevant, necessary, and reasonable'.
- 2.66** Other respondents suggested that LAs should give consideration as to what risk mitigation measures operators already have in place and should not be encouraged (either deliberately or inadvertently) to impose additional conditions as standard, or on a "pick and mix" basis. In a similar vein one respondent suggested that LAs should not "micromanage" operators through excessive and arbitrary additional conditions.
- 2.67** One LA requested further guidance as to how an LA should reach the decision that imposing additional conditions would be appropriate.

## The Commission's position

### The Use of Conditions

The imposition of conditions forms part of a suite of tools available to the regulators to mitigate risk at a national (Commission) and local (LA) level. LAs should firstly look at the controls and policies that an operator has in place when considering an application, to ascertain if the risks to the licensing objectives are sufficiently mitigated without the need for conditions. If local circumstances indicate that conditions are necessary then the LA could seek for these to be volunteered through discussion with the operator, or to attach them to the licence at review. Conditions are not intended to micromanage an operator, but to mitigate local risks in accordance with the aim permit framework. Part 9 of the Guidance set out the circumstances in which LAs might consider the use of conditions.

The Commission notes that the majority of respondents are satisfied that the Guidance offers clear guidance as to the circumstances in which conditions should be applied. Indeed, as highlighted above, it is expected that conditions will be applied to mitigate evidence based risks and, on this basis, will be proven to be relevant, necessary and reasonable.

The Commission considers the guidance provided in Part 9 to be sufficient and does not seek to expand this further.

## Consultation question

Q12. Do you have any comments on the premises licence conditions provided at Appendix F? Do you have any further examples of appropriate premises licence conditions that either have been, or may be adopted?

## Respondents' views

- 2.68** There were a total of 22 responses to this question. Five LAs responded that they welcomed the inclusion of the sample conditions.
- 2.69** Two LAs suggested that the example conditions were not written tightly enough, while one other LA suggested that some of the examples as given were too explicit.
- 2.70** Three industry trade associations and one LA suggested that if the example conditions are to be included, they should be categorised according to what type of licensed business they would apply to. One LA suggested that the examples be included within the main body of the Guidance, so that the conditions have the same force as the statutory guidance.
- 2.71** Six industry respondents (three trade associations and three operators) said it would be wrong of the Commission to provide a “pick list” as this may encourage LAs to impose arbitrary conditions that do not reflect the nature of a specific risk. Two industry respondents were concerned that if significant inconsistency emerged between LA areas, operator’s primary authority arrangements could be jeopardised. One trade association suggested that by providing example conditions, the Commission was blurring the distinction between the operating and premises licensing regimes.

## The Commission’s position

### Inclusion of sample conditions (Appendix F)

The Commission has decided to put the sample conditions on its website (instead of in the Guidance) so that they can be easily updated as/when LAs share more examples.

### ‘Pick list’ of conditions

Some responses expressed the view that the provision of a sample list of conditions would simply provide LAs with a “pick list” from which they could arbitrarily choose conditions to impose on a particular premises licence. The Guidance stresses in a number of places that conditions must be evidence based and that LAs should only impose conditions which can be related to the exercise of their powers under s153.

### **Wording of sample conditions/linking samples to premises type**

The Commission notes the points made in relation to wording of the sample conditions and suggestions that the conditions should be listed with reference to the type of premises each relates to. The conditions listed have been drafted by LAs to address specific local risks to the licensing objectives and as such are only included for illustrative purposes. LAs would need to adapt according to local circumstances. Conditions cannot be listed by premises type as conditions should reflect the local circumstances and concerns, not the type of premises and gambling offered.

### **'Blurring of lines'**

The Commission does not consider the sharing of example conditions to constitute a 'blurring of lines' between operating and premises licence regimes. See paragraph 2.33 above for further details of the Commission position with regards to division of powers.

## **Revisions to part 16: Gaming machines and part 26: Premises licensed to sell alcohol**

### **Consultation question**

Q13. Do you have any comments or views on the proposed revisions to Part 16 and 26?

### **Consultation proposals**

- 2.72** The amendments to Part 16 were drafted to give greater clarification around gaming machine entitlements and the position in relation to multiple activity premises, as well as the need for appropriate licences environments. The Commission has also become aware of circumstances in which unlicensed premises have applied for an alcohol licence in order to benefit from automatic gaming machine entitlements provided under the Act. The Guidance was updated to reinforce the powers afforded by s284 of the Act in which LAs may revoke the automatic gaming and machine entitlements provided under the Act itself, if they are concerned that gambling is not ancillary to the main activities of the premises.

### **Respondents' views**

- 2.73** The Commission received 16 responses to this question.
- 2.74** Two LAs and one other stakeholder welcomed the additional clarification of gaming machine terms and the listing of premises machine entitlements in a tabular format.
- 2.75** Two trade associations raised the point that the drafting suggested that gambling should be the ancillary part of any business that held an alcohol licence, and this was obviously not correct in the instances of bingo and casino businesses.
- 2.76** Two operators expressed the view that the Guidance should make clear that there are no statutory limits on the number of self-service betting terminals (SSBTs) that can be sited within a betting shop, and that efforts on behalf of LAs to introduce any restrictions should be based on solid evidence of jeopardy to the licensing objectives.

## The Commission's position

### Ancillary alcohol provision

The Commission considers that the current drafting in relation to the ancillary provision of alcohol in gambling premises is sufficient. This Guidance accords with Licence Condition 16, which will be the subject of a separate consultation in due course.

### SSBTs

The Commission considers that paragraph 19.9 sufficiently captures the issues that LAs will need to take into account with regards to placing restrictions on SSBTs in betting premises. With reference to the powers afforded to LAs under s.181 of the Act, paragraph 19.9 of the Guidance states: *when considering whether to impose a condition to restrict the number of SSBTs in particular premises, the licensing authority, amongst other things, should take into account the ability of employees to monitor the use of the machines by children and young persons or by vulnerable people.*

## Revisions to part 36: Compliance and enforcement

### Consultation question

Q14. Do you have any comments or views on the proposed revisions to part 36?

### Consultation proposals

- 2.77** A number of the revisions made to this section were to clarify the enforcement powers that are available to LAs and provide further guidance on the manner in which these can be deployed. Greater emphasis was given to partnership working between the Commission and LAs, and to the development of the Primary Authority scheme, which currently extends to proactive regulatory activity in relation to underage gambling (in England and Wales).
- 2.78** A table setting out powers of entry and other inspection powers was also included in Appendix G. The Commission sought views on these amendments.

### Respondents' views

- 2.79** There were a total of 15 responses received to this question. Four Scottish LAs and one other stakeholder expressed the view that a mechanism for Scottish licensing standards officers to be authorised to assess gambling premises still does not exist, and noted that this could not be corrected outside of the passing of new primary legislation.
- 2.80** Three industry respondents (one trade association and two operators) requested that it be clarified that while LAs are still able to conduct age verification test purchasing, primary authority agreements oblige them to clear this action with the LA acting as the operator's primary authority. Another respondent expressed concern that encouraging LAs to undertake different approaches to regulation risks jeopardising operators' primary authority arrangements.
- 2.81** Other respondents suggested that operators be encouraged to share the outcomes of, for example, age verification test purchasing with all the LAs that have issued them premises licences; and that a stricter burden of evidence should be required for LAs (ie they should prove non-compliance, rather than the operator proving compliance). A trade association suggested that Commission policy should focus on combating non-compliance, rather than increasing the burden on lawful operators.



## The Commission's position

### Scottish Licensing Standard Officers

The Commission [advice note on the subject of LSO powers](#) will shortly be updated to provide further clarification.

### Primary Authority (age verification testing)

Some respondents suggested that LAs seeking to conduct age-verification test will need the approval of the Primary Authority. The requirement to adhere to the Primary Authority arrangement does not apply to LAs undertaking intelligence led reactive test-purchasing activities. Whilst it is recommended that the LAs consult with the PA prior to conducting reactive compliance activities, this is not a mandatory requirement.

Concern was expressed that if LAs sought to adapt their regulatory approach to address local issues there would be a greater level of inconsistency which would serve to undermine the Primary Authority framework. Primary Authority arrangements only cover proactive age restricted sales of gambling and do not impact other powers afforded to LAs under the Act.

### Sharing results of age verification testing

The Commission notes the request that operators are encouraged to share the results of age verification test purchasing with LAs. Whilst an LA's statement of policy may identify the sharing of such information as a requirement for the operator's local risk assessment, this is primarily a matter for local determination.

### Non-compliance

Some respondents suggested that there should be a stricter burden of evidence on LAs to prove non-compliance prior to seeking enforcement action. The revised Guidance promotes a more proactive approach to regulation in which lawful operators are able to evidence that they have in place sufficient policies and procedures to mitigate risks to the licensing objectives. The Guidance has been updated on the precept that proactive engagement between operators and LAs will deliver more cost effective regulation and reduce the back and forth between licence holder and regulator. The LCCP is underpinned by the principle that the primary responsibility for protecting the licensing objectives rests with gambling operators.

## Other issues and comments

### Consultation question

Q15. Do you have any further opinions, comments or views on the changes we have made to this new edition of the Guidance?

## Consultation proposals

- 2.82** The consultation document highlighted the intent of the Guidance and the rationale underpinning the revisions made to the latest iteration. The Commission sought any further views and comments on the Guidance.



## Respondents' views

- 2.83** The Commission received a total of 21 responses to this question. All substantive points made in response to this question have been addressed elsewhere in the responses document.
- 2.84** Two LAs and one other stakeholder however, indicated that they found the Guidance clear, concise, and easy to follow and refer to.

### Consultation question

Q16. Are there any further changes or amendments to the Guidance you would like us to consider?

## Respondents' views

- 2.85** There were 9 responses to this question, suggesting further changes or amendments to the Guidance. There were no apparent themes and each respondent highlighted separate issues. Suggestions from LAs included a request for guidance to be given as to how an LA might measure and evidence the cumulative impact of multiple gambling premises in a area; the inclusion of a list of organisations that may be able to provide assistance in evidence gathering and analysis; guidance on how LAs should conduct their consultation exercises; and a request that the final document be edited to remove duplication and to take a more formal written style.
- 2.86** One respondent suggested that the reference to the Legislative Reform Order to remove the prohibition on employment of under-18s at race tracks should be re-included; and that a more succinct final version would be appreciated.

### The Commission's position

The situation with regards to the Legislative Reform Order has been reinstated along with some minor points of clarification made to the Guidance on tracks in Part 20.

For additional clarification the Commission has included some further information in Part 6 around the requirement to review statements of policy every three years; about point information in Part 15; about Category D machines in Part 16 and about when automatic machine entitlement renewals are required in Part 26.

The Commission has also ensured consistency with the formatting of the Guidance in terms of hyperlinks, footnotes and abbreviations and the Glossary Appendix.

## Future editions of the Guidance

### Consultation question

Q17. What are your views on future improvements to the Guidance, in particular, would you support an approach of more succinct statutory guidance supported by separate advice notes?

## Consultation proposals

- 2.87** The consultation document highlighted that the proposed amendments were the beginning of a process of change and improvement and that future iterations would further reflect developments in partnership working between the Commission, industry and LAs.
- 2.88** The Commission has indicated that it plans to further streamline the Guidance in the future. Finally, the consultation document also stated that whilst the amount of explanatory material for LAs would not diminish, it may be appropriate to replace the amount of statutory guidance with more flexible and adaptable forms of advice, in the future. The Commission welcomed views on this future consideration.

## Respondents' views

- 2.89** The Commission received a total of 24 responses to this question. Twelve respondents, both industry stakeholders and LAs, stated that they would support the provision of a more succinct statutory guidance. One respondent suggested the Guidance could be further edited to remove excessive detail and reduce complexity. Conversely, eight respondents (seven LAs and one trade association) stated that they would prefer the Commission to produce a single consolidated and comprehensive document.
- 2.90** One LA and two operators suggested that advice notes should not be produced as the norm, but reserved for more complex areas. Three industry stakeholders expressed the view that the issuing of advice notes should be discouraged as they are not subject to the consultation process and thus pose the risk that the Commission may seek to “legislate” on important topics without the input of all necessary interested parties.
- 2.91** Two operators also suggested the Guidance was too long, and should be aiming to reduce regulatory burdens, rather than increasing them. Two other industry respondents (one trade association and one operator) also reiterated the point that there should be adherence with the Regulators' Code.

### The Commission's position

The Commission notes the comments and these will be borne in mind for future revisions.

## 3 Conclusion

- 3.1** The Commission is grateful for the responses received to this consultation and the information that has been provided. We have made a number of amendments and added further information to the Guidance as a result of the responses received to this consultation.
- 3.2** We have set out in the responses document some of the key issues that were discussed in the consultation and consequently the substantive changes made to the Guidance as a result.
- 3.3** We have made other amendments to the Guidance from the feedback we have received but we did not intend to set out all of the changes as many of these are minor or inconsequential.
- 3.4** The 5th edition of the Guidance to Licensing Authorities will take immediate effect upon publication, concurrently with publication of this document, and is available on the Commission's website.
- 3.5** The forthcoming consultation on licence condition 16 and relevant codes will also include a consultation on sections of the Guidance. This will be updated separately.

## Appendix A: List of respondents

List of Respondents	Category
1. Aberdeen City Licensing Board	Licensing board
2. Association of British Bookmakers	Industry body
3. Beacon Bingo Ltd	Industry body
4. The Bingo Association	Industry body
5. British Amusement Catering Trade Association	Industry body
6. Cashino Gaming Ltd	Industry body
7. City of Glasgow Licensing Board	Licensing board
8. Convention of Scottish Local Authorities	Government body
9. East Lindsey	Local authority
10. Fraser Brown	Professional body
11. Gala Coral Group	Industry body
12. The Gambling Business Group	Industry body
13. Harrogate Borough Council	Local authority
14. Highland Licensing Board	Licensing board
15. The Institute of Licensing	Industry body
16. Leeds City Council	Local authority
17. London Borough of Haringey	Local authority
18. Medway Council	Local authority
19. Newcastle City Council	Local authority
20. Northumberland County Council	Local authority
21. Novomatic UK Ltd.	Industry body
22. Paddy Power	Industry body
23. Praesepe Plc	Industry body
24. Racecourse Promoters Association Limited	Industry body
25. Renfrewshire Licensing Board	Licensing board
26. Southwark Council	Local authority
27. South Somerset District Council	Government body
28. West Dunbartonshire Licensing Board	Licensing board
29. West Lothian Licensing Board	Local authority
30. William Hill	Industry body
31. The Local Government Association	Local government body

## Keeping gambling fair and safe for all

For further information or to register your interest in the Commission please visit our website at:  
[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

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