

Response from	Points raised	Officer comment
Bingo Association	Suggest add “and above” to 9.5.14	SLP now includes this
Gamble Aware	Do not provide specific feedback but commend two publications from the Local government Association	Officers are aware of these documents and their content. Consider there is nothing in these documents to warrant any alterations to the SLP.
Gamcare	Do not provide specific feedback but provide a list of factors they think will be helpful to consider	Officers aware of the points raised and do not consider alterations to the proposed SLP is necessary
Association of British Bookmakers (via Gosschalks solicitors)	<p>Para 9.5.2 states the most recent LCCP guidance was revised in 2015, it has been revised further in 2018</p> <p>At para 9.5.6 they argue the bullet point list of categories of vulnerable people be removed.</p> <p>9.5.12 The wording suggests the applicant is to provide counselling sessions, which they are not in a position to do</p> <p>9.5.14 refers to Challenge 21 which is the LA03 scheme, the GA05 is “Think 21”</p> <p>At 9.5.17 deals with inducement to gamble and suggests premises do not offer free or cut price alcohol or food, ABB advise premises for years have provided free tea, coffee and biscuits and request clarification.</p> <p>ABB request 11.2 should be expanded to make it clear that the mandatory and default conditions are usually sufficient to ensure operation that is reasonably consistent</p>	<p>Para 9.5.2 has been amended to reflect this and the new guidance considered. It does not require further change to the SLP</p> <p>The authority is at liberty to make policy and give clear guidance on considerations applicants need to address. No change to the SLP</p> <p>Wording amended to read “directing to a counselling session”</p> <p>Paragraph amended to read Think 21</p> <p>Officers consider the wording appropriate and will not prevent this practice from continuing unless it is shown it is acting as an inducement to gamble.</p> <p>This is not necessary as in 11.1 one of the points is</p> <ul style="list-style-type: none"> not seeking to address a matter already dealt with by mandatory conditions and; <p>Therefore no change made</p>

	with the licensing objectives and additional conditions will only be necessary where there is evidence of a risk to the licensing objectives in the circumstances of a particular case that requires that the mandatory and default conditions be supplemented.	
SCC Public Health	Support the SLP and wish to build on partnership working	No changes necessary
Race Course Association	Note the document but advise they have no premises in our area so no comment	No change necessary
Talarius Ltd (a Gaming operator)	<p>Suggest 9.1 (d) includes the Authority must also refer to its Statement when taking decisions.</p> <p>They comment on 9.5.6 but do not seek amendment.</p> <p>They challenge the wording of 9.5.7 advising conditions can only be imposed if necessary and proportionate and the wording suggests otherwise.</p> <p>9.5.9 lists records expected to be kept, Talarius suggest this is excessive as it is covered by the LCCP. The list in the SLP exceeds the LCCP.</p> <p>9.5.9 Talarius consider stating the list is not exhaustive is not enforceable</p> <p>9.5.9 (g) Talarius question the need for this.</p>	<p>Officers consider this is covered in the paragraphs that follow 9.1(d)</p> <p>Officers satisfied in the title of that paragraph it states “exploited by gambling”. No change necessary</p> <p>Wording is adequate, we state “where appropriate”, therefore when necessary and proportionate, no requirement to change</p> <p>The authority is at liberty to publish its own policy and give clear guidance to applicants. Consider no change required.</p> <p>We do not wish to provide a defined list and therefore include the comment “not exclusive to”. This will provide the opportunity to consider other evidence when working with the trade to establish patterns of problem gambling. No change required</p> <p>This allows the authority to specify the type of risk data it is seeking. No change required.</p>

	<p>9.5.9 (e) and (f) appear the same</p> <p>They suggest GDPR implications are addressed here</p> <p>9.5.11, 9.5.12, 9.5.14, 9.5.18 and 9.5.19: These paragraphs all duplicate LCCP requirements and, as such, we submit are inappropriate</p> <p>9.5.13: As the authority appreciates, issues of planning are irrelevant under the Act and we suggest that is highlighted in this paragraph.</p> <p>9.5.19 – page 20: the RGT is now called GambleAware. It does not provide approval of leaflet and poster content. Again, such issues is covered by the LCCP and to deal with it in the Draft would be inappropriate duplication.</p> <p>Para 16 and 17: the list of possible measures and conditions set out for AGCs and FECs are not repeated for Bingo or Betting premises, despite the fact that both provide access to gaming machines as well as other activities and the bets/stakes/prizes at such premises can be considerably higher than in AGCs and FECs. We suggest that this</p>	<p>They are not the same, one a young person enters with adults, the other it enters with complicit adults. The first suggests a young person entering at the same time as an adult, the other when entering with an adult who is the company of the young person. No change required.</p> <p>There is already mention of the data being redacted to prevent the sharing of sensitive data, consider this is sufficient. No change required.</p> <p>Inclusion in the policy ensures applicants and licence holders are clear on the expectations. No change required.</p> <p>There is no requirement to place this in the SLP. No change required.</p> <p>RGT replaced by GambleAware, otherwise no change</p> <p>The types of premises are distinctly different and do not consider the inclusion of the list adds to the SLP</p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>unjustified inconsistency be remedied.</p> <p>Para 22.5 We are confused as to why “harm” in the context of UFEC permits is broader than it is for licensed premises where gaming machines of a higher category are present. Both types of permissions are creatures of the Act and subject to the same Licensing Objectives. The 3rd licensing objective is very clear that it relates to harm or exploitation by gambling – as is appreciated at para 9.5.6 of the Draft. As such, we do not think it can be correct that applicants for a permit are expected to consider harm to children in a wider sense.</p>	<p>This is dealing with the suitability of an applicant and looking at the Gambling commission guidance for UFEC in particular to para 24.8. We do acknowledge the point raised and have inserted the word ‘necessarily’ on line 3 of the paragraph.</p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------