



NOTICE OF MEETING

Scrutiny Review - Clustering of Betting Shops

WEDNESDAY, 10TH NOVEMBER, 2010 at 15:00 HRS - CIVIC CENTRE, HIGH ROAD, WOOD GREEN, N22 8LE.

MEMBERS: Councillors Browne, Diakides, Ejiofor, Newton and Winskill (Chair)

AGENDA

- 1. APOLOGIES FOR ABSENCE**
- 2. DECLARATIONS OF INTEREST**

A member with a personal interest in a matter who attends a meeting of the authority at which the matter is considered must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.

A member with a personal interest in a matter also has a prejudicial interest in that matter if the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgment of the public interest **and** if this interest affects their financial position or the financial position of a person or body as described in paragraph 8 of the Code of Conduct **and/or** if it relates to the determining of any approval, consent, licence, permission or registration in relation to them or any person or body described in paragraph 8 of the Code of Conduct.

- 3. LATE ITEMS OF URGENT BUSINESS**

The Chair will consider the admission of any late items of urgent business. Late items will be considered under the agenda items where they appear. New items will be dealt with at item 9 below.

4. WELCOME AND INTRODUCTION TO THE SCRUTINY REVIEW PROCESS

Cllr David Winskill, Chair of the scrutiny review panel.

5. THE FRAMEWORK FOR THE LICENSING OF GAMBLING PREMISES (PAGES 1 - 60)

Robin Payne, Assistant Director of Enforcement, LB Haringey
Daliah Barrett, Lead Licensing Officer, LB Haringey
Eveleen Riordan, Planning Project Manager, LB Haringey
Ciara Whelehan, Planning Policy, LB Haringey
Antonios Michael, Senior Lawyer, LB Haringey

Attachments:

- Clustering of Betting Shops in Haringey: Background Report
- Statement of Gambling Policy – Haringey Council

6. THE VIEWS OF THE GAMBLING REGULATOR - THE GAMBLING COMMISSION (PAGES 61 - 86)

Matthew Hill, Director of Strategy, Research & Analysis.

Attachments:

- Betting Industry Statistics 2008/9, Gambling Commission
- British Gambling Prevalence Survey 2007 (Executive Summary)

7. REPRESENTATIONS FROM THE BETTING SHOP INDUSTRY (PAGES 87 - 166)

Patrick Nixon, Chief Exec. Association of British Bookmakers
Andrew Lyman, Head of Public Affairs, William Hill plc
Ciaran O'Brien, Head of Public Relations, Ladbrokes plc
John Fairey, Development Director, Paddy Power plc

Attachments:

- Submission from the Association of British Bookmakers
- Safebet Alliance: Voluntary Code of Safety and Security National Standards for Bookmakers
- Submission from William Hill plc

**8. THE IMPACT OF THE CLUSTERING OF BETTING SHOPS IN THE COMMUNITY
(PAGES 167 - 204)**

Police Sergeant Chris Weston-Moore Problem Oriented Policing Advisor,
Metropolitan Police

Attachments:

- Gambling Analysis 2010

Adrian Scarfe, Head of Clinical Training, GamCare

Attachments:

- About Gamcare
- GamCare Annual Report 2010

Additional attachments:

- Gambling, alcohol consumption, cigarette smoking and health: findings from the 2007 British Gambling Prevalence Survey (Gambling Commission, 2009)

9. NEW ITEMS OF URGENT BUSINESS

To consider any new items of urgent business admitted under item 3 above.

10. MEETING ADJOURNMENT

The meeting will adjourn at approximately 5.30pm and reconvene for session 2 at 6.00p.m.

Session 2 – start at 6pm

11. EVIDENCE FROM THE PUBLIC (PAGES 205 - 218)

The purpose of the second session is primarily to hear evidence from local residents, community and residents groups and businesses to help the panel understand what impact the clustering of betting shops may be having in local areas and on local communities in Haringey.

The session will be held in a workshop format, to enable as many people as possible to participate and contribute evidence to the review.

It is planned to hold two open concurrent evidence sessions where local people can participate and give their evidence to panel members. Members of the public are asked to give evidence at one of the following groups (based on geographical area):

Group 1: Haringay Green Lanes/ Wood Green corridor (Council Chamber)

Group 2: Northumberland Park/ Bruce Grove (Committee Room 2)

A summary of evidence received issues raised within the groups will be reported back in the plenary session.

Written submissions received from the public:

- An independent trader from High Road, N17
- Find Your Voice - a local pressure group to campaign against the proliferation of betting shops in the London Borough of Haringey
- Derek Webb, Haringey resident, successful gambler and businessman (of Prime Table Games)
- A Haringey resident

12. PLENARY

For groups to report back on evidence presented / issues raised.

13. CONCLUSIONS AND RECOMMENDATIONS

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**The Clustering of Betting Shops in Haringey
Scrutiny Panel
Wednesday 10th November 2010**

Report Title: The Clustering of Betting Shops in Haringey

Report authorised by: Cllr David Winskill, Chair of the Scrutiny Review of Clustering of Betting Shops

Contact Officers: Martin Bradford, Overview & Scrutiny, 0208 489 6950

Wards(s) affected: **ALL**

Report for: **Non Key**

1. Purpose of the report (that is, the decision required)

- 1.1 This is an information report for members of the scrutiny review panel investigating the clustering of betting shops in Haringey.

2. State link(s) with Council Plan Priorities and actions and /or other Strategies:

- 2.1 *Priorities:* to create a *Better Haringey:* cleaner, greener and safer
- 2.2 Sustainable Community Strategy 2007 – 2016 with *People at the heart of change* where Haringey will:
- have an environmentally sustainable future
 - have economic vitality and prosperity shared by all
 - be safer for all

3. Recommendations

- 3.1 That this report be considered in order to inform and facilitate the scrutiny panel in gathering evidence from stakeholders attending the planned review meeting (to be held at 3pm on Wednesday 10th November 2010).

4. Reason for recommendation(s) N/A

5. Other options considered N/A

6. Chief Financial Officer Comments

6.1 The costs of preparing this report have been met from within existing budgets.

7. Head of Legal Services Comments

7.1 The legal aspects are outlined in the body of this report.

8. Head of Procurement Comments N/A

9. Consultation

9.1 As part of the scrutiny review process key stakeholders have been invited to an evidence gathering session (to be held on 10th November 2010). Contributors at this session will include local licensing and planning officers, the Gambling Commission, betting shop operators, Metropolitan Police and GamCare.

9.2 Local residents, community groups, residents associations and local businesses have been invited to attend a separate evidence gathering session (also to be held on the 10th November) to enable them to describe how the clustering of betting shops may impact on local areas and on local communities.

9.3 The panel will also undertake a site visit to where betting shops are clustered. It is hoped that the visit will offer the panel an opportunity to talk to staff and users of local betting shops and possibly to neighbouring traders.

9.4 Officers from licensing, planning and legal services departments in Haringey Council have been consulted in the development of this report.

10. Service Financial Comments

10.1 This review will be carried out within the current resources of the Overview and Scrutiny Service.

10.2 Any financial implications resulting from the recommendations of the review will be assessed within the final report.

11. Use of appendices /Tables and photographs

11.1 These are outlined in the main body of the report.

12. Equalities and community cohesion

12.1 Through discussions with stakeholders and consultation with local residents, the evidence gathering event planned for the 10th November will provide an opportunity to assess whether the clustering of betting shops disproportionately affects communities in Haringey (with particular reference to the nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

12.2 Any evidence that the clustering of betting shops impacts disproportionately on any communities in Haringey will be highlighted in the final review report, and, in consultation with the Equalities Department, develop appropriate recommendations for action.

13. Local Government (Access to Information) Act 1985

- Statement of Gambling Policy (Haringey Council, 2007)
- References to sourced information are included within the body of the report

1. Introduction

- 1.1 There has been widespread concern among both councillors and local residents about the clustering of betting shops in Haringey. It is perceived that the liberalisation of gambling laws, as enacted through the Gambling Act 2005, has allowed for the clustering of betting shops which may be having an adverse impact on the communities and areas in which they are clustered.
- 1.2 This issue was discussed at Full Council on 19th July 2010. Whilst councillors did not have any moral objections to gambling per se, concerns were raised that the character and amenity of an area may be affected where betting shops clustered. Specifically, councillors were concerned that the concentration of betting shops in a local area:
- may not reflect the needs or expectations of local people
 - may limit the choice and retail appeal of a local area to local residents
 - may impact on the future sustainability of local communities.
- 1.3 Members of the Overview & Scrutiny Committee have agreed to conduct an investigation into the clustering of betting shops in Haringey. Through talking to relevant stakeholders, local residents and other community representatives, it is hoped that a review will help to collect evidence on the clustering of betting shops and the impact that this may have in the community. Evidence will primarily be gathered through a consultation and evidence gathering session planned for Wednesday 10th November 2010.
- 1.4 It is hoped that the scrutiny review will raise awareness of the licensing framework for gambling premises and help to find solutions to any problems identified with the clustering of betting shops during the review process. The panel will produce a report of the evidence gathered and record it's the conclusions and recommendations reached on this issue. This report will be submitted to Overview & Scrutiny Committee for approval before its recommendations are considered by Cabinet.
- 1.5 The following report aims to provide background information to the scrutiny review panel to support the scrutiny review process.

2.0 The scope of the scrutiny review

- 2.1 The review panel intends to complete a scrutiny review to address the following overarching questions:
- Has the concentration of betting shops increased in the borough since the Gambling Act 2005 came in to force, and if so, has this adversely affected local communities?
 - If communities are adversely affected, are there any local solutions to these problems?
- 2.2 The scrutiny review will specifically focus on betting-shops in Haringey. The scrutiny review will not concern itself with on-line gambling or other local forms of gambling (such as bingo or gaming centres).

- 2.3 The scrutiny review will aim to address the following objectives:
- to raise awareness of the licensing and planning framework surrounding the regulation of betting shop premises in Haringey
 - to establish whether the Gambling Act 2005 has precipitated a rise in gambling premises licensed in Haringey
 - to assess the spatial distribution of licensed gambling premises across Haringey and the degree to which these are clustered
 - to collect and collate evidence from local stakeholders on the impact of the clustering of betting shops within local communities
 - to assess how other Local Authorities are dealing with this issue
 - should any adverse affects/impacts of the clustering of betting shops be identified within the review, to assess ways in which these could be addressed
 - to identify ways in which the findings and conclusions of this review should be communicated and disseminated to a) local communities b) national and local decision makers.

3. The Gambling Act 2005

3.1 The Gambling Act 2005 was introduced to reflect the widespread changes that have occurred throughout the gambling industry and in recognition of the need to modernise and update a regulatory framework which had been in force for nearly 40 years. The centrepiece of this legislation was the creation of the Gambling Commission, a new independent regulator for all gambling activities in the UK.

3.2 The Gambling Commission is required to regulate gambling in the interests of the public and is responsible for the regulation of bookmakers, casinos, bingo clubs, lottery operators, arcade operators and remote gambling operators. In regulating all gambling operators, the Commission is required to adhere to the three key gambling objectives:

- to keep crime out of gambling
- ensure that gambling is conducted fairly and openly
- to protect children and vulnerable people from being harmed or exploited.

3.3 The Gambling Act 2005 established a tripartite system of regulation involving the government, the Gambling Commission and the Licensing Authority (the Local Authority). The regulatory framework for the gambling industry is underpinned by the issuing of three types of license; operating licenses, personal licenses and premises licenses. The type of license, purpose and the issuing authority are described in the table below:

License Type	Issuer	Purpose
Operating License	Gambling Commission	That operators comply with principle gambling objectives
Personal License	Gambling Commission	Certain senior individuals to require a license within some operators
Premises License	Licensing Authority	Applications considered where gambling premises are located

4.0 The role of the Gambling Commission

- 4.1 The Gambling Commission issues operating licenses to prospective gambling providers. A gambling operator wishing to open a gambling establishment in any locality will first need to obtain an operating license. The Gambling Commission will assess prospective operators to ensure that it has appropriate governance procedures and is compliant with the overriding aims of the legislation (as in 3.2). Successful applicants may then apply for a premises license from the Licensing Authority where it wishes to conduct its gambling activities.
- 4.2 Through providing information, guidance and support to Licensing Authorities the Gambling Commission aims to ensure that there is a consistent national standard of licensing. The Gambling Commission has extensive powers and may impose a range of restrictions on individual licensees. The Commission can enter premises, impose unlimited fines and ultimately withdraw licenses. The Commission also has powers to investigate and prosecute illegal gambling.

5.0 The role of the Licensing Authority (Local Authority)

Statement of Gambling Policy

- 5.1 The Gambling Act 2005 requires each Licensing Authority to produce a Statement of Gambling Policy for its locality. This policy is underpinned by the three gambling principles (as set out in 3.2) and is intended to show how the Licensing Authority will exercise its functions and the principles it intends to apply. The Licensing Authority must demonstrate that it has consulted local stakeholders in the development of the local gambling policy.
- 5.2 Whilst all Licensing Authorities are required to produce a local gambling policy, there is in effect little local variation, as the content of such policies are tightly prescribed by the regulations issued with the Act.

Premises License

- 5.3 The main role of the Licensing Authority is to consider applications for premises licenses from gambling operators intending to conduct gambling activities in the locality. The Licensing Authority is required to approve premises licences for all gambling activities in the locality including:
- bingo
 - betting shops
 - adult gaming centres (high stakes electronic gaming)
 - family gaming centres (lower stakes electronic gaming)
 - casinos
 - racecourses and dog tracks.
- 5.4 In considering an application for a premises license, there are a number of license conditions which the Local Authority can consider, these are known as mandatory, default and discretionary conditions of the license. Mandatory and default conditions are prescribed by the Gambling Act.¹ Mandatory conditions cannot be

¹ An example of mandatory conditions might be: a Prominent Notice prohibiting under 19's at every entrance, Summary of license to be displayed in a prominent place. Default conditions relate to times for gambling i.e. for betting shops 7a.m.-10p.m.

varied by the Licensing Authority but default conditions can be altered or removed by the Licensing Authority.

- 5.5 The Licensing Authority does have limited powers to vary the conditions of the premises license under the discretionary guidance. Such variations may include the opening hours or security arrangements for the proposed gambling establishment. Once again, the conditions that the Licensing Authority can set within individual licenses are tightly prescribed by the Gambling Commission and cannot contravene guidance issued through the regulator. In summary, the Licensing Authority can only set conditions for a premises license where:
- they are relevant to make the building safe
 - are directly related to the premises
 - are fair and reasonable and relate to the scale of the premises
 - reasonable in all other aspects.
- 5.6 It is of critical importance to note that the Gambling Act clearly specifies that the Licensing Authority shall aim to permit applications for a premises license so long as this conforms to relevant Codes of Practice, in accordance with any relevant guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and lastly in accordance with the policy statement published by the Licensing Authority. In this context, so long as the applicant can demonstrate that the license does not contravene the codes of practice and is reasonably consistent with the 3 gambling objectives (crime and disorder, fair and open gambling & protection of children and vulnerable adults) there is limited scope for the Licensing Authority to reject the application.
- 5.7 Prior to the Gambling Act 2005, the approval of local gambling licences was exercised by the Local Magistrates Court. Within this previous system there was more local discretion in considering license applications, in particular, Magistrates could apply a 'demand test', where licenses could be withheld if it was considered that there were too many gambling premises to meet anticipated demand in a particular area. There is no such provision in the Gambling Act 2005.

Enforcement

- 5.8 Enforcement of the Gambling Act and associated regulations and licenses is shared between the Gambling Commission, the Licensing Authority and the police. The Licensing Authority is specifically expected to monitor and enforce the conditions of premises licences. To this end, an annual inspection of gambling operators in the area is undertaken to ensure that they are compliant with the terms of their premises licences. The inspection may assess a range of factors including:
- Ensuring that there is no change to the specified floor plan
 - Is compliant in terms of the number and location of gaming machines
 - Ensuring that self exclusion forms barring problem gamblers are prominently displayed
 - Contact information from agencies providing support for problem gamblers is also prominently displayed.

Greater local participation in licensing decisions

- 5.9 By making the Local Authority the Licensing Authority instead of the Magistrates Court, the Gambling Act 2005 intended to give local people a greater say in local licensing decisions. As the business of the Licensing Authority is managed through the existing Licensing structures of the Local Authority, it was anticipated that greater local participation and greater local scrutiny of gambling license applications would be achieved through:
- licensing and Planning Committee meetings being held in public
 - elected representatives being able to sit on licensing committees
 - elected representatives being able to make representations about a license without being asked by a resident to do so.
- 5.10 When the Licensing Authority is considering a premises license from a gambling operator, the Gambling Act specifies that representations may be made from a variety of local stakeholders including responsible authorities (e.g. Local Authority, police, planning, fire authorities), a person resident close to the prospective gambling premises, local business interests or representatives of any of the preceding groups (such as lawyers, Councillors or other community representatives). However, representations from any of the above parties can only be made if they are relevant to the three overarching gambling objectives; that it is fair and open, does not generate crime & disorder and ensures the protection of vulnerable adults and children (as specified in 3.2.).
- 5.11 In order to influence gambling license decisions, local representations must produce sufficient evidence to be able to demonstrate how the granting of a specific premises license will affect the overarching gambling principles. That is, how will the granting of one specific license impact on, for example, crime and disorder in that locality?
- 5.12 All appeals against decisions made by the Licensing Authorities in England and Wales are made to the Magistrates Court.

6.0 The role of planning and Use Class Orders for betting shops

- 6.1 The current Unitary Development Plan policy, TCR3 (Protection of Shopping Frontages), sets out the criteria for determining planning applications for a change of use from retail to non retail. The emerging Core Strategy and the first draft Development Management Development Plan Document (DM DPD) have similar policies seeking to limit the number of non-retail uses in order to protect the viability and vitality of the Town and District centres in the borough. As part of the DM DPD process, the planning policy team is working on policy options and interventions, within the national planning framework, on betting shop clusters in Haringey's town centres. The emerging policy on this will be produced for the next round of consultation on the DM DPD.
- 6.2 Betting shops fall within Use Class A2 (Financial and Professional Services)² of the Town and Country Planning (Use Classes) Order 1987 (as amended). Planning permission **is** required to turn any retail or other unit into a betting shop, but planning permission is **not** required for any change in use within Class A2 (e.g. for

² Financial Services – Banks, Building Societies and Bureau de Change. Professional Services (not Health or Medical Services) – Estate Agents & Employment Agencies, Other Services – Betting Shops.

an estate agent or a bank to become a betting shop). Neither is planning permission required to turn any unit into a betting shop (or other A2 use) from Classes A3, A4 and A5. The table below summarises this position.

From	To
A2 (professional and financial services) when premises have a display window at ground level	A1 (shop)
A3 (restaurants and cafes)	A1 or A2
A4 (drinking establishments)	A1 or A2 or A3
A5 (hot food takeaways)	A1 or A2 or A3

Table 1: permitted development rights within the Use Class Order

- 6.3 Since 2000, 17 planning applications for betting shops have been received by Development Management; 11 of which have been granted planning permission, 5 have been refused and 1 withdrawn. Three applications have been the subject of appeals, of which one appeal was upheld. It must be borne in mind that Development Management will not receive a planning application for any proposed betting shops **where a change of use requiring planning permission is not involved** (see table above). Licensing's figures will accurately reflect the units that have become betting shops i.e. where a license has been issued, irrespective of whether a planning application has been/is required for the change of use. Licensing is therefore able to provide the most up-to-date figures on the increase in the numbers of units becoming betting shops as all betting shops are required to obtain a license, but not all units will require planning permission for use as a betting shop.
- 6.4 There has been suggestion that an Article 4 Direction³ could be used to control the use of betting shops, but it would be very difficult to make an Article 4 Direction Order that is specifically use class based within the General Permitted Development Order (GPDO) to control a business operation. There are a number of uses that fall within Class A2 that would be acceptable in the primary and secondary shopping areas of the town and district centres to ensure that the planning policies enhance the viability and vitality of these centres around the borough. Current shop units that fall within Use Class A2 can freely operate as a betting shop and this cannot be controlled by any Article 4 Direction. Where an A2 use is acceptable within the Town and District centre and is in compliance with the planning policy and planning permission is granted, other operations that fall within the use class cannot be controlled by condition as permission is granted for the class of use and not the business operation. Article 4 Directions are area based and the purpose of the Direction is to remove 'permitted development rights' of a property and bring it under planning control. Following Article 4 Direction, development that had been permitted would now require permission.
- 6.5 The use of an Article 4 Direction to control the use of premises for a betting shop use would be costly and difficult. It would require an Article 4 Direction Order to be made for each Town and District centre and a boundary would need to be defined. However, the boundary of the Town and District centres in the borough does not

³ A power available under the 1995 General Development Order allowing the Council, in certain instances, to restrict permitted development rights.

always include all of the shops within the local area, and some units will sit outside of the boundary.

6.6 Government guidance on Article 4 Direction is set out in circular 9/95 'General Development Order Consolidation 1995' and states that:

“permitted development rights have been endorsed by Parliament and consequently should not be withdrawn locally without compelling reasons. Generally...permitted development rights should be withdrawn only in exceptional circumstances”.

6.7 The Circular makes clear that there is a high threshold to reach before the Secretary of State will consider that an Article 4 Direction is justified, and the current legislation is framed to be permissive. Any body of evidence gathered to support an Article 4 Direction which sought to control the proliferation of betting shops would need to be robust and conclusive in terms of any harm resulting as a consequence of this proliferation.

6.8 An alternative would be to lobby central government to make betting shops 'sui generis'⁴, that is, sitting within a use class of their own so that planning permission is **always** required for a change of use unless the shop unit is already a betting shop and the change is just to the provider of the service.

7.0 Gambling and betting shops – a national perspective

What is gambling?

7.1 Gambling can be defined as *'the wagering of money or something of material value on an event with an uncertain outcome with the primary intent of winning additional money and/or material goods'*. Gambling can take many forms and operate through a variety of mediums. The following table outlines the main forms of gambling and the nature of the activities involved.

	Definition	Example	Medium
Gaming	Stakes on a game of chance	Casino games	Casinos, internet.
Betting	Stakes on a race, outcome or event	Sports results	On course, bookmakers, internet, telephone,
Lottery	Allocation of prizes on basis of chance	National Lottery Local Lotteries	Retail outlets, internet, tele. & other venues.

Prevalence of gambling

7.2 The most recent prevalence data (2007) indicated that in excess of 2/3 (68%) of the adult population undertook some form of gambling activity in the previous 12 months.⁵ If those who solely gamble on the National Lottery are excluded however, then just 48% of the adult population participated in some form of gambling in the past 12 months.⁶ Current trend data would appear to indicate a

⁴ A use which does not fall into any of the categories defined within the Town and Country Planning (Use Classes) Order 1987.

⁵ Gambling Prevalence Survey 2007

⁶ Gambling Prevalence Survey 2007

decline in gambling activity in the UK in the period 1999-2007.⁷ The British Gambling Prevalence Survey is conducted every three years; data collection has taken place in 2010 and will be released in 2011.

- 7.3 The most popular form of gambling in the UK is the National Lottery in which over ½ (57%) of the adult population participate.⁸ Scratchcards (20%) and horseracing (17%) are the next most popular form of gambling activity.⁹ The data also shows the emergence of new forms of gambling such as spread betting (where potential winnings are linked to accuracy of wager) and Betting Exchanges (where wagers are laid through a betting intermediary). A table depicting the prevalence of different gambling activities in the UK is given below.

National Lottery	57%	Private betting	10%
Scratchcards	20%	Bingo	7%
Horseracing	17%	Dog racing	5%
Slot machine	14%	On line	3%
Other lotteries	1%	Spread Betting	1%
		Betting Exchanges	1%

Key gambling data

- 7.4 Whilst the prevalence of gambling in the adult population may have gone down since 1999, the amount of money that has been staked has grown significantly in the past 5 years. Total UK gambling stakes have risen from £53billion in 2001-2 to £91 billion in 2005-6.⁵ The gambling industry is a significant contributor to the UK economy employing over 120,000 people and contributing £1.4 billion to the exchequer each year¹¹; equivalent to 1% of all government revenues.¹²

Financial Year	Total Stake
2001-02	52,561
2002-03	63,394
2003-04	77,916
2004-05	92,496
2005-06	91,516

- 7.5 Betting shops were first legalised in the UK in 1961. Historically, there were many more betting shops in the UK than there are at present; in the early 1980's there were estimated to be approximately 15,000 betting shops. With consolidation among gambling operators however, it is estimated that currently there are approximately 8,800 betting shops in the UK.

⁷ Gambling Prevalence Survey 2007

⁸ Gambling Prevalence Survey 2007

⁹ Gambling Prevalence Survey 2007

¹⁰ Gambling Prevalence Survey 2007

¹¹ Preventing UK Gambling Harm, Responsibility in Gambling Trust, 2007

¹² Department of Culture Media & Sport, Gambling Data 2008

¹³ HMRC bulletins, Gaming Board, Gambling Commission Annual Reports, DCMS estimates.

- 7.6 There has been some media speculation that the establishment of highly profitable Fixed Odds Betting Terminals (FOBT) in betting shops has arrested the decline of betting shops: in 2001, when the first FOBTs were installed in betting shops nationally, there were 39 new planning applications for licensed bookmaker premises, in 2002 the figure rose to 98, in 2003 it was 196 and 2004 there were 340 applications were made.^{14, 15, 16} Under current regulations, 4 FOBT's are permitted in each betting shop. As of December 2008, it was estimated that there were 27,500 FOBTs in the UK.¹⁷

8.0 Betting shops in Haringey

- 8.1 Local data indicates that as of August 2010, there were 66 betting shops in Haringey. Licensing data would appear to indicate that the majority (70%) of these betting shops were operated by two major gambling operators.

Operator	Units	Operator	Units
Ladbrokes	27	Elite	1
William Hill	20	Jennings	1
Betfred	4	Metrobet	1
Coral	4	Thames	1
PaddyPower	4	Totesport	1
Betterbet	2	Total	66
Jennings	1		

- 8.2 There has been some speculation that since the Gambling Act 2005 came into force, there has been an increase in the number of betting shops locally. Local licensing data however would suggest that there has not been an increase in the number of betting shops in Haringey since the Gambling Act came into force: whilst 10 new betting shop licenses have been granted 12 have been surrendered. This could indicate that some market adjustment has been taking place since the Gambling Act has come into force.

The distribution of betting shops across Haringey

- 8.3 Appendix A demonstrates the distribution of betting shops across Haringey. This would appear to indicate that the location of betting shops is not evenly distributed across the borough:

- a majority (85%) are located in the east of the borough
- major betting operators have the majority of units in the east of the borough:
 - Ladbrokes 22 of 27 units in the east of the borough
 - William Hill 19 of 20 units in the east of the borough

- 8.4 Closer analysis of the location of betting shops (Appendix A) would appear to suggest that there are number of localities where these are clustered in the borough, these include:

- Wood Green (High Road/ Lordship Lane)

¹⁴ Betting shop gaming machines cause concern Daily Telegraph 4th March 2005

¹⁵ Cost of UK's Gambling Habit The Guardian 29th September 2007

¹⁶ Ladbrokes Biggest Earner the Guardian 17th August 2008

¹⁷ Gambling Commission, Industry Statistics 2008/9

- Harringay (Green Lanes/ St Ann's Road)
- Tottenham Green (West Green Road/High Road)
- Bruce Grove (High Road)

- 8.5 There are wide variations in the number of betting shops located in each local authority ward in Haringey (Appendix B). This data is summarised below:
- the average number of betting shops per LA ward in Haringey is 3.4.
 - Noel Park has the highest number of betting shops (n=11)
 - two wards do not have any betting shops (Alexandra and Stroud Green)
- 8.6 Analysis of the location of betting shops in Haringey by social deprivation has been undertaken (Appendix C). This demonstrates that 28 out of 65 (43%) of betting shops in Haringey are located in super output areas which are among most socially deprived (top 10%) in England.
- 8.7 Using licensing data collected from eight neighbouring local authorities comparisons have been made in terms of the number of licensed betting shops in operation (Appendix D) and the adult population per betting shop (Appendix E). Analysis of this data demonstrates that:
- Islington (n=80) and Newham (n=80) have the highest number of betting shops whilst Waltham Forest (n=61) has the lowest
 - The highest concentration of betting shops per adult population is in Islington (2,020 adults per betting office) and the lowest being in Enfield (with 3,210 adults per betting office).
 - Haringey is mid range in both these assessments: there being 66 betting offices in the borough, and, 2,740 adults per betting office.

9.0 Haringey Licensing Action

Licensing Appeals

- 9.1 Haringey received applications for three new gambling premises in Harringay Green Lanes in the early stages of the Gambling Act coming into force (two applications for betting shops and one application for an Adult Gaming Centre). These applications received a number of representations from local residents, police and ward councillors. The applications were subsequently refused by the Licensing Committee.
- 9.2 The reasons the Licensing Committee gave for rejecting the applications was based on the weight of evidence submitted by local residents about the applications not being in accordance with the first licensing objective relating to gambling not being a source of crime and disorder and the third licensing objective relating to the protection of children and vulnerable persons. Relevant to this was the proximity of the premises to a clinic for young people with mental health problems and to other mental health service provision. Further, the applications were rejected because of the association of gambling in this locality with crime and disorder. In addition, there was evidence of a concentration of housing of multiple occupation and vulnerable ethnic minority residents who would be at risk of over exposure to gambling. The Committee did not see how any conditions that could be imposed would overcome these objections.

9.3 All three operators appealed the decision to the Magistrates Court. The Licensing Authority defended its decision and provided evidence from local residents, a local GP, the Director of Public Health and local police officers. The magistrates upheld the appeal and ruled that Haringey's Licensing Authority had acted unreasonably. The Magistrates cited that in reaching their decision they had regard to section 153 of the Act, which states that we should "aim to permit".

Lobbying Central Government

9.4 The Cabinet Member for Neighbourhoods has lobbied both the Government and the Local Government Association for a change to the Gambling Act and associated guidance.

9.5 On the 19th August 2008 the Cabinet Member wrote to the then Secretary of State for Culture Media and Sport, the Rt., Hon., Andy Burnham MP, expressing concern that local authorities have no effective controls to limit the number of gambling premises opening in their boroughs. In the letter, the Cabinet member reflected on the experiences of Haringey and a Counsel opinion that in effect, no new application could be refused.

9.6 Initially the response from the Department of Culture Media and Sport (DCMS) was that it was too early to make changes, but further lobbying through the Local Government Association resulted in an announcement on the 2 December 2008 by the then Prime Minister that he would ensure that "local communities and their authorities have sufficient **powers to prevent the clustering of betting shops** in areas where this is a problem." This commitment was subsequently confirmed as a Government priority in the Queen's Speech. It was understood that there would be an early review of the powers available to local authorities and a published report of the findings and proposals. To date no report has been published.

9.7 In February 2010, the Cabinet Member wrote again, this time to Rt., Hon., Ben Bradshaw MP the then Secretary of State for Culture Media and Sport, seeking confirmation of whether the review of powers to deal with the clustering of betting shops had been undertaken, and the date by which the findings would be published.

9.8 Officers also supplied submissions to the Head of Regulation at DCMS to support the need for change in the legislation and guidance, and for DCMS to sponsor a study into the impact of betting shops. A detailed specification for this study was also provided. Although DCMS accepted no guidance had been issued they did identify that they believed Local Planning Authorities could effectively use Article 4 Directions to control problems.

9.9 In July 2010 the Leader of the Council and the Cabinet Member wrote again, this time to the Rt., Hon., Jeremy Hunt MP, Secretary of State at DCMS. In this letter they sought an explanation of the Government's position, provided an explanation for why Article 4 Directions are an inappropriate power for dealing with the clustering of betting shops, and highlighted the increasing concern that betting shops are linked to crime and low level disorder.

- 9.10 In response the John Penrose MP, Minister for Tourism and Heritage wrote to confirm that he believed that Article 4 Directions under the Town and Country Planning Act are appropriate where there is a “real or specific threat”. He further confirmed that there was a discussion being undertaken on how guidance could be improved so that where there is a link between crime and disorder and specific premises, action could be taken.
- 9.11 In addition to the above Assistant Director of Enforcement established a problem solving group involving the police, Community Safety, Lead Officer for Licensing and Director of Public Health. This group looked specifically at the evidence of impact from betting shops. This group concluded that there is evidence that betting shops in Haringey are associated with reported crime; that gaming machines (FOBTs) are strongly linked to reported and actual criminal damage and that there is some evidence of children accessing shops. A fifth of reports at betting shops relate to disorder, however, by comparison a single popular fast food restaurant may achieve the same number of reports as all betting shops in the borough over a similar period. There is a variation in the relative volume of crime reports raised that seem to be linked to the different reporting policies of different betting shops (operators). The tasks agreed were to:
- complete further study on underage sales – Trading Standards/Licensing
 - task truancy patrols on potential locations
 - lobby for improved powers to control location/numbers of FOBTs
 - maintain CCTV tasking of hot spot locations.

10.0 Betting shops and other local authorities

- 10.1 Concerns around the clustering of betting shops are not confined to Haringey, as the Local Government Association has lobbied central government to reintroduce the power of the Licensing Authority to restrict licenses in geographical areas.¹⁸ In addition, a number of Local Authorities in London areas have sought to address this concern. The following summarises some objectives and outcomes of these investigations/ reviews.

London Borough of Hackney

- 10.2 A scrutiny commission conducted a review of betting shops in Hackney.¹⁹ The review found that there were 64 betting shops in Hackney; in comparing this figure across other local authorities it was the 8th highest in terms of absolute number of betting shops and third highest per capita. Concerns were raised within the review which suggested that betting shops were clustered in areas of high social deprivation (one locality has 8 betting shops and another 5) and that there were limited powers within the local licensing and planning framework to restrict such concentrations of betting shops.
- 10.3 The review recognised it was important for the authority to continue to gather local data and conduct further research in this issue to support policy aspirations in this area. In addition, the review recommended that:

¹⁸ <http://www.lga.gov.uk/lga/core/page.do?pagelid=1083651>

¹⁹ Scrutiny inquiry on ‘The Concentration of Betting Shops in Hackney’ Hackney Council, July 2009

- That the council in seek additional powers under the Sustainable Communities Act 2007 to better control one type of retail premises (such as betting shops) from dominating the character of a street.
- That the Council continue to lobby central government to create a separate planning “use class” for betting shops.

London Borough of Waltham Forest

- 10.4 Waltham Forest has also sought to address concerns around the concentration of betting shops through the borough’s Local Development Framework. The development of the replacement core strategy will provide an opportunity to improve community safety and cohesion by co-ordinating land uses:
- so as to minimise the likelihood of anti-social behaviour hot-spots
 - ensure that commercial centres provide a mix of uses that cater for all sections of the community.
- 10.5 On the proliferation of particular types of uses, Waltham Forest are considering a policy to ensure appropriate clustering of uses within town centres and local retail parades. Their policy tests will have regard to the following:
- the number of same type establishments in the immediate area,
 - the extent to which the proposed use meets an important local need (to be identified through local need surveys)
 - the potential benefits the use will provide for the wider community.
- 10.6 Waltham Forest has commissioned work on a 'High Street Life Strategy' and they are hoping that they will be able to apply threshold limits on the number of betting offices/estate agents/ take aways acceptable in a given frontage.

Greater London Assembly

- 10.7 The London Assembly’s Planning and Housing Committee has conducted a review in to the decline of neighbourhood shops in London.²⁰ The focus of this report is London’s ‘local’ centres, the smaller neighbourhood and local parades that provide convenient access to goods and services that are needed on a day-to-day basis, especially those that are accessible on foot, and also serve as a focus for a local neighbourhood.
- 10.8 The report noted that local centres provide a wider social and economic role and one that is central to a sustainable neighbourhood; the report notes that over 50% of the turnover of independent retailers goes back into the local community, compared to just 5% from supermarkets. The report also suggests that such local centres are important in serving the needs of the disadvantaged, socially excluded and elderly, particularly those with a lack of mobility who cannot access more distant shops.
- 10.9 But despite these benefits, the report concluded that local independent retailers are coming under sustained pressure not only from the economic downturn but also through the entry of large corporate chains into local neighbourhood centres (e.g. ‘local format’ stores such as ‘Tesco Metro’ and ‘Sainsbury’s Local’).

²⁰ Cornered shops London's small shops and the planning system Planning and Housing Committee, Greater London Assembly, July 2010

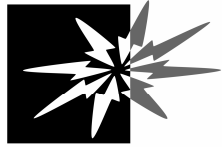
- 10.10 The report suggests that London lost more than 7,000 individual or family-owned shops in the period 2001 to 2007 and that the number of store closures has been far greater in the smaller neighbourhood centres than any other location in both percentage and volume terms. The report estimates that over the last ten years small shop numbers in these locations have fallen by more than 20 per cent.
- 10.11 In this context, the report also highlights the national and regional trend of financial institutions (banks and building societies) migrating their businesses away from local shopping centres, which presents new opportunities for betting shops. The report notes that betting shops may take over redundant financial services premises without requiring planning permission as they are in the same use class (A2 – see section 6). The report recognises the proliferation of, among other uses, betting shops within small shop units and the potential impact that these have on local shopping centres/parades within which they are situated.
- 10.12 The report calls on the Mayor to make changes to the London Plan to strengthen protection for local shops and give boroughs more power to resist or negotiate on planning applications from big corporate retailers. In addition it recommends that London boroughs have policies to:
- protect retail uses in neighbourhood parades within walking distance
 - protect small retail units from adverse impacts from new retail development
 - reflect the need for local small shops to be easily accessible via a full range of sustainable modes of transport.

11.0 Summary

- 11.1 It would appear that the Licensing Authority has limited discretion in considering premises licenses from gambling operators or indeed setting conditions to those that are approved. There is also no 'demand' test in the legislation, which means Licensing Authorities cannot limit the number of bookmakers in a particular area. Critically, the Gambling Act 2005 specifies that the Licensing Authority must *aim to permit* premises licenses as long as they conform to three key gambling objectives (fair, crime free and protects vulnerable adults and children).
- 11.2 Whilst the Gambling Act 2005 seeks to encourage greater local participation in gambling license decisions, in effect, actual opportunities for local people and their representatives to influence these decisions are limited. The parameters of permitted representations are restricted to evidence pertaining to the three key gambling objectives (crime free, fair and open and protection of children and vulnerable adults) and the likelihood of local representatives may provide sufficient weight of evidence to suggest that these objectives are compromised is low. Critically, to influence the granting of a local betting license, local representatives must demonstrate how the granting of one additional betting shop premises license will impact on crime or disorder, will affect fair play, or impact on children or vulnerable adults.
- 11.3 Given the limitations of influencing the number and distribution of betting shops through the licensing framework (as specified in the Gambling Act), and in the absence of national legislation, other authorities have sought to address this issue through amended local planning policy and guidance. It is anticipated that such

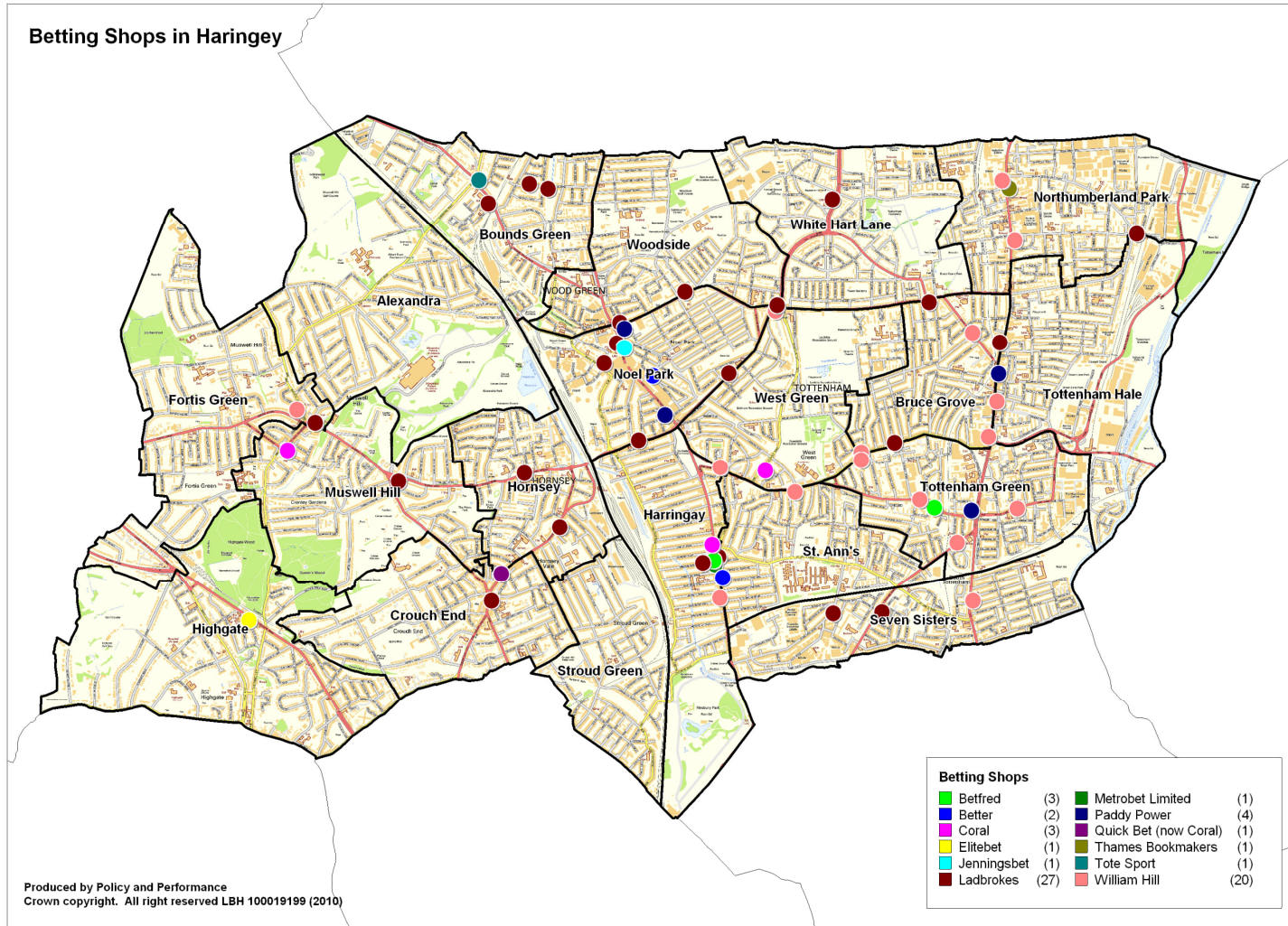
amendments may strengthen the local authority position in being able to influence the shape and character of retail in local neighbourhood centres. It is noted however that local authorities are in the early stages of developing such new planning guidance, and that as yet, these remain untested.

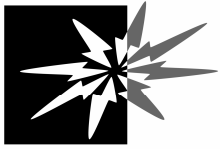
- 11.4 The adoption of any planning policy to further control or limit the proliferation of betting shops within the borough **must** be based on and supported by appropriate research and evidence that demonstrate the planning justification for applying such a control.
- 11.5 Evidence from other authorities would suggest that it is important for local authorities to collect data and other information on betting shops to help develop a local evidence base. Currently there is little evidence to assess what impact the clustering of betting shops may have within the community or the wider implications of the Gambling Act 2005 has had within Haringey in general. It is therefore apparent that the Licensing Authority will need to develop local intelligence, data and monitoring information to guide and inform the position that the Council may wish to take upon this issue in respect of licensing and planning policy.
- 11.6 As has been noted in this report, in addition to the Council, a number of other Local Authorities and regional organisations have or are in the process of lobbying for change in this area (for example, the London Assembly's Planning and Housing Committee, the Local Government Association). This could, in the longer term, possibly lead to both national and regional changes in the licensing and planning framework.



Haringey Council

Appendix A – The location of betting shops across Haringey.

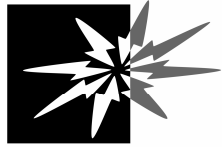




Haringey Council

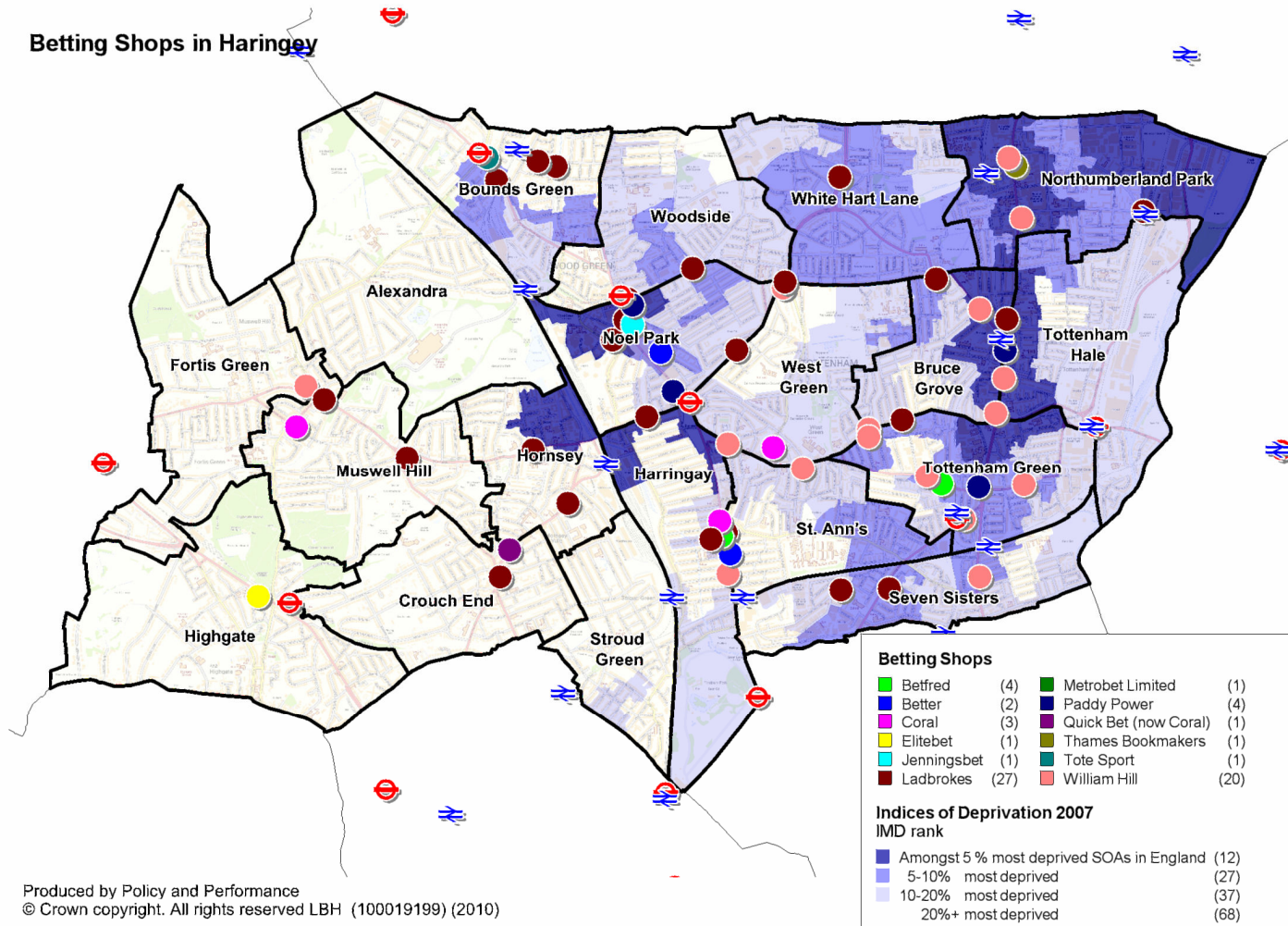
Appendix B – Number of Betting shops by Local Authority Ward



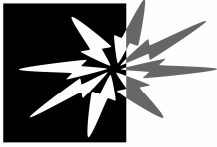


Haringey Council

Appendix C - Location of betting shops in Haringey by social deprivation (ward).

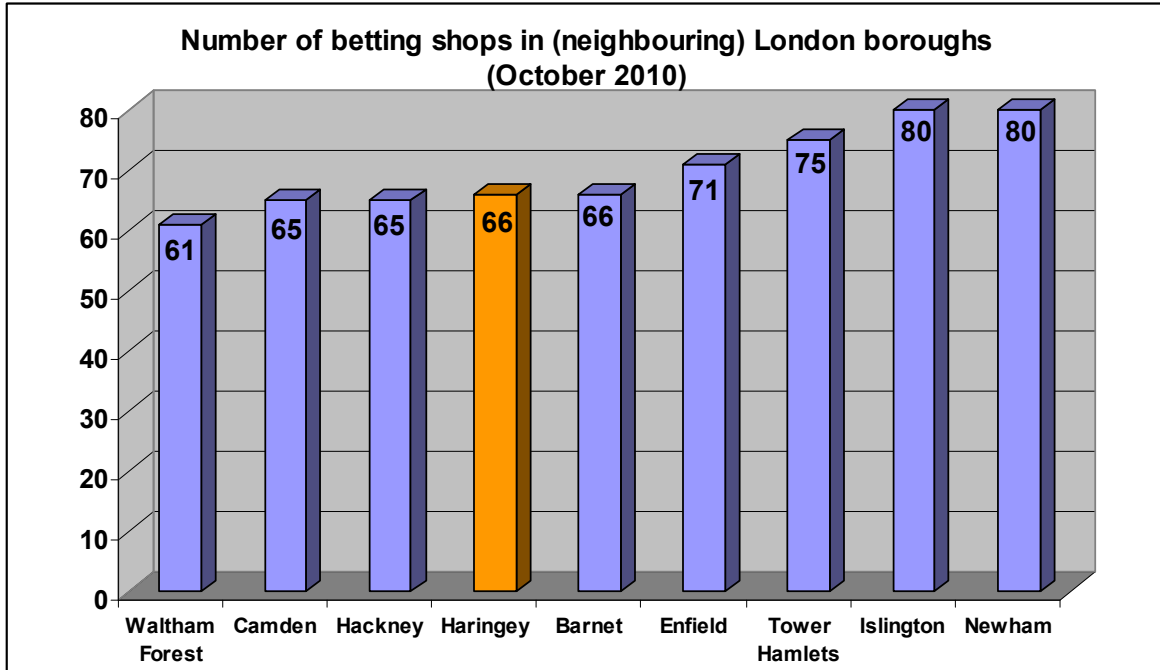


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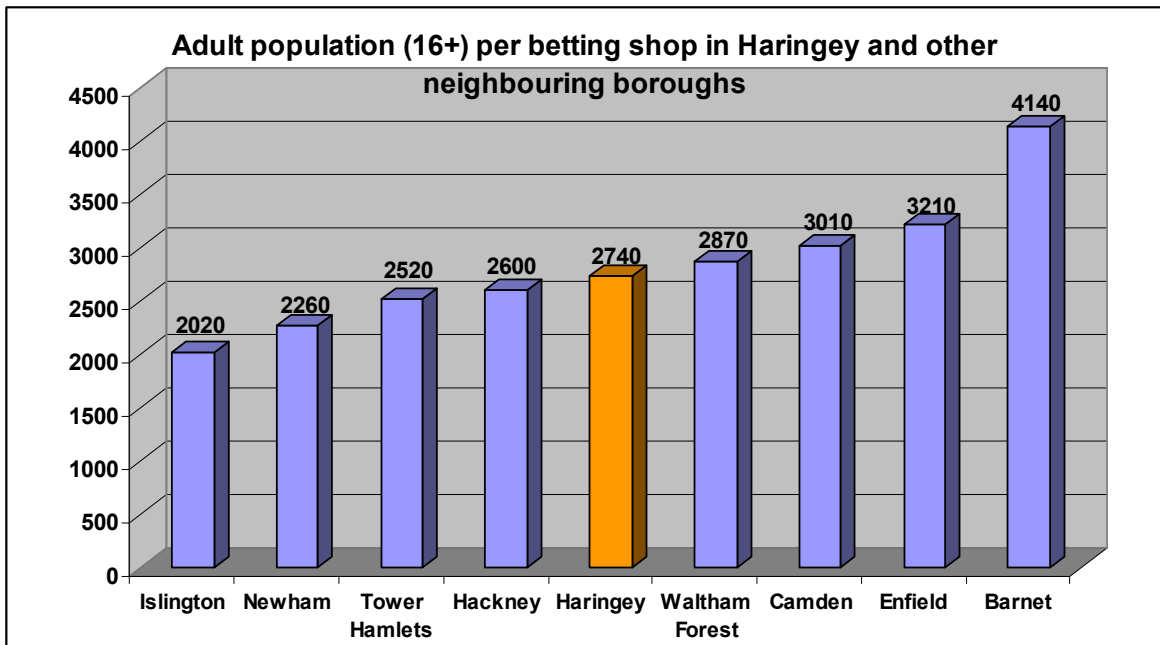
Haringey Council

Appendix D – Number of betting shops in Haringey and other surrounding boroughs.



Based on data collected from borough licensing departments October 2010.

Appendix E – Adult population (16+) per betting shop in Haringey and other surrounding boroughs.



Betting shop data based on data collected from borough licensing departments October 2010. Population data based on GLA population estimates for 2009.



STATEMENT OF GAMBLING POLICY

LONDON BOROUGH OF HARINGEY

Statement of Gambling Policy

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STATEMENT OF GAMBLING POLICY

1. Introduction

Haringey Council will become the Licensing Authority under the Gambling Act 2005. This will result in the Council becoming responsible for granting Premises Licences in the Borough of Haringey in respect of:-

- ❖ Casino Premises;
- ❖ Bingo Premises;
- ❖ Betting Premises, including Tracks;
- ❖ Adult Gaming Centres;
- ❖ Family Entertainment Centres.

The Gambling Act 2005 requires the Council to prepare and publish a "Statement of Licensing Policy" that sets out the policies that the Council will generally apply to promote the Licensing Objectives when making decisions on applications made under the Act.

This "Statement of Licensing Policy" has been prepared having regard to the provisions of the Guidance issued by the Gambling Commission and the licensing objectives of the Gambling Act 2005.

This "Statement of Gambling Policy" is available on Haringey Council's website, and at one or more public libraries situated in the Borough and / or in other premises situated in the Borough .

This Policy comes into effect on 31 January 2010, and will be reviewed as necessary, and at least every three years from the date of adoption.

2. The London Borough of Haringey

Map of the London borough of Haringey



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Haringey is one of London's 32 Boroughs. It is located in the north of the capital and is more than 11 square miles in area. According to the 2001 Census nearly half of its 224,300 people come from ethnic minority backgrounds. It is often said that Haringey is an outer London Borough with inner London challenges.

There are approximately 100,000 dwellings and approximately 8,200 businesses employing 64,700 people.

There are a number of Bingo Premises, Bettings Shops and Adult Gaming Centres

List of persons this authority consulted: A full list of consultees is available on the website, www.haringey.gov.uk/licensing_

3. Glossary of Terms

Within this Statement of Gambling Policy, the following words and terms are defined as stated:

Licensing Objectives: As defined in section 4 below

Council: Haringey Council

Borough: The area of London administered by the London Borough of Haringey

Licences: As defined in section 5 below

Applications:	Applications for licences and permits as defined in section 5 below
Notifications:	Means notification of temporary and occasional use notices
Act:	The Gambling Act 2005
Regulations:	Regulations made under the Gambling Act 2005
Premises:	Any place, including a vehicle, vessel or moveable structure
Code of Practice:	Means any relevant code of practice under section 24 of the Gambling Act 2005
Mandatory Condition:	Means a specified condition provided by regulations to be attached to a licence
Default Condition:	Means a specified condition provided by regulations to be attached to a licence, unless excluded by Haringey Council
Responsible Authority:	<p>For the purposes of this Act, the following are responsible authorities in relation to premises:</p> <ol style="list-style-type: none">1. The Licensing Authority in whose area the premises are wholly or mainly situated (“Haringey Council”);2. The Gambling Commission;3. Metropolitan Police Constabulary4. London Fire and Emergency Planning Authority5. Building Control Manager, Assistant Director Planning , Haringey Council6. Commercial and Environmental Protection Team, Haringey Council;7. Policy & Performance Manager, Children’s Services Officer in Social Services, Haringey Council;8. HM Customs and Excise.
Interested Party:	<p>For the purposes of this Act, a person is an interested party in relation to a premises licence if, in the opinion of the Licensing Authority which issues the licence or to which the application is made, the person:-</p> <ol style="list-style-type: none">(a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities;(b) Has business interests that might be affected by the authorised activities;(c) Represents persons who satisfy (a) or(b) above.

PART A

4 Licensing Objectives

The Gambling Act 2005 requires that the Council carries out its various licensing functions with a view to promoting the following three licensing objectives:-

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
2. Ensuring that gambling is carried out in a fair and open way;
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

In exercising most of their functions under the Gambling Act 2005, Licensing Authorities must have regard to the licensing objectives.

It should be noted that the Gambling Commission has stated: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".

This Licensing Authority is aware that, as per Section 153 of the Act, when making decisions about Premises Licences and temporary use notices it should aim to permit the use of premises for gambling in so far as it thinks it is:

1. in accordance with any relevant code of practice issued by the Gambling Commission;
2. in accordance with any relevant guidance issued by the Gambling Commission;
3. reasonably consistent with the licensing objectives and
4. in accordance with the authority's statement of gambling policy.

5 Types of Licence

This document sets out the policies that the Council will apply when making decisions upon applications or notifications made for:-

1. Premises Licences;
2. Temporary Use Notices;
3. Permits as required under the Act;
4. Registrations as required under the Act.

6 Licensable Premises and Permits

This policy relates to all those licensable premises, notices, permits and registrations identified as falling within the provisions of the Act, namely:-

1. Casinos;
2. Bingo Premises;
3. Betting Premises;
4. Tracks;
5. Adult Gaming Centres;
6. Family Entertainment Centres;
7. Premises Licences
8. Club Gaming Permits;
9. Prize Gaming and Prize Gaming Permits;
10. Temporary Use Notices;
11. Registration of small society lotteries.

7 General Principles

Nothing in this Statement of Policy will:-

1. Undermine the rights of any person to apply under the Act for a variety of permissions and have the application considered on its individual merits; OR
2. Override the right of any person to make representations on any application or seek a review of a licence or permit where they are permitted to do so under the Act.

The starting point in determining applications will be to grant the application without conditions. Conditions will only be considered where they are needed to meet the requirements of the licensing objectives, and any conditions applied will not be overly onerous and will be proportionate to the scale of the application and the risks involved. The applicant will demonstrate a right to occupy the premises and holds or has applied for an operating licence which allows him or her to carry out the proposed activity. Conditions will generally be considered unnecessary if they are already adequately covered by other legislation.

When determining an application to grant a Premises Licence or review a Premises Licence, regard will be had to the proximity of the premises to schools, vulnerable adult centres or residential areas where there may be a high concentration of families with children. The proximity of premises taken into consideration will vary depending on the size and scope of the gambling premises concerned. Each case will, however, be decided on its merits. Therefore, if an applicant can effectively demonstrate how they might overcome licensing objective concerns, this will be taken into account.

Licensing is about the control of licensed premises, temporary use notices or occasional use notices within the terms of the Act. Conditions may be attached to licences that will cover matters that are within the control of individual licensees.

When considering any conditions to be attached to licences, the Council will primarily focus on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activity in the area concerned. The Secretary of State may by regulation provide for specified conditions to be attached to a premises licence as either "mandatory" or "default" conditions. In

determining an application the Council may not have regard to the expected demand for the facilities which it is proposed to provide. Moral objections are also not valid reasons for rejecting an application.

8 Responsible Authorities and the protection of children from harm

The Licensing Authority is required by regulations to state the principles it will apply in exercising its powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The principles are:

- A *The need for the body to be responsible for an area covering the whole of the licensing authority's area; and*
- B *the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group.*

The contact details of all the Responsible Authorities under the Gambling Act 2005 are available via the Council's website at: www.haringey.gov.uk

9 Interested parties

Interested parties can make representations about licence applications, or apply for a review of an existing licence. These parties are defined in the Gambling Act 2005 as follows:

"For the purposes of this Part a person is an interested party in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the applications is made, the person-

- (a) lives sufficiently close to the premises to be likely to be affected by the authorised activities,*
- (b) has business interests that might be affected by the authorised activities, or*
- (c) represents persons who satisfy paragraph (a) or (b)"*

The licensing authority is required by regulations to state the principles it will apply in exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party. The principles are:

- Each case will be decided upon its merits.
- This Authority will not apply a rigid rule to its decision making. It will consider the examples of considerations provided in the Gambling Commission's Guidance for Local Authorities at 8.14 and 8.15. It will also consider the Gambling Commission's Guidance that 'has business interests' should be given the widest possible interpretation and include partnerships, charities, faith groups and medical practices.
- The Gambling Commission has recommended that the Licensing Authority states that...'*interested parties include trade associations and trade unions, and residents' and tenants' associations (Gambling Commission Guidance for Local Authorities 8.17).*' This Authority will not however generally view these

bodies as interested parties unless they have a member who can be classed as an interested person under the terms of the Gambling Act 2005 i.e. lives sufficiently close to the premises to be likely to be affected by the activities being applied for or has business interests that might be affected by the authorised activities..

Interested parties can be persons who are democratically elected such as councillors and MP's. No specific evidence of being asked to represent an interested person will be required as long as the councillor / MP represents the ward likely to be affected. Likewise, parish councils likely to be affected, will be considered to be interested parties. Other than these however, this authority will generally require written evidence that a person/body (e.g. an advocate / relative) 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities. For example, a letter from one of the persons so affected and , requesting the representation may be sufficient.

If individuals wish to approach councillors to ask them to represent their views then care should be taken that the councillors are not part of the Licensing Committee dealing with the licence application. If there are any doubts then please contact the licensing department.

10 Exchange of Information

Licensing authorities are required to include in their statements the principles to be applied by the authority in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information between it and the Gambling Commission, and the functions under section 350 of the Act with respect to the exchange of information between it and the other persons listed in Schedule 6 to the Act.

The principle that this licensing authority applies is that it will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information which includes the provision that the Data Protection Act 1998 will not be contravened. The Licensing Authority confirms that it has procedures in place so as to ensure that it can comply with the requirements of the Freedom of Information Act 2000. The licensing authority will also have regard to any Guidance issued by the Gambling Commission to local authorities on this matter when it is published, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

Should any protocols be established as regards information exchange with other bodies then they will be made available. Discussions with the Gambling Commission and LACORS as regards information exchange between the Commission and local authorities are, at the time of writing, at an early stage.

11 Declaration

In producing this Policy, this licensing authority declares that it has had regard to the licensing objectives of the Gambling Act 2005, the guidance issued by the Gambling Commission, and any responses from those consulted.

12 Enforcement

Licensing authorities are required by regulation under the Gambling Act 2005 to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.

This Licensing Authority's principles are that:

It will be guided by the Gambling Commission's Guidance for Local Authorities, and Enforcement will endeavour to be:

- Proportionate: regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised;
- Accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- Consistent: rules and standards must be joined up and implemented fairly;
- Transparent: regulators should be open, and keep regulations simple and user friendly; and
- Targeted: regulation should be focused on the problem, and minimise side effects.

As per the Gambling Commission's Guidance for local authorities this licensing authority will endeavour to avoid duplication with other regulatory regimes so far as possible.

This Licensing Authority will also, as recommended by the Gambling Commission's Guidance for Local Authorities, adopt a risk-based inspection programme. Whilst the Gambling Commission's Guidance suggests that the criteria the authority will utilise in this respect are included in this statement, this has not been possible. At the time of writing the Gambling Commission has not published its risk criteria, nor are regulations such as mandatory / default conditions published, nor Codes of Practice. LACORS is working with the Gambling commission to produce a risk model for premises licences and this authority will consider that model once it is made available

The main enforcement and compliance role for this Licensing Authority in terms of the Gambling Act 2005 will be to ensure compliance with the premises licences and other permissions which it authorises. The Gambling Commission will be the enforcement body for operating and personal Licences. It is also worth noting that concerns about manufacture, supply or repair of gaming machines will not be dealt with by the Licensing Authority but will be notified to the Gambling Commission.

This Licensing Authority will also keep itself informed of developments as regards the work of the Better Regulation Executive in its consideration of the regulatory functions of Local Authorities.

Bearing in mind the principle of transparency, this Licensing Authority's enforcement/compliance protocols/written agreements will be available upon request

to the licensing department. Our risk methodology will also be available upon request.

The Council recognises that, apart from the licensing function, there are a number of other mechanisms available for addressing issues of unruly behaviour that can occur away from licensed premises, including:-

1. Planning controls;
2. Ongoing measures to create a safe and clean environment in these areas in partnership with local businesses, transport operators and other Council departments;
3. Regular liaison with the Police on law enforcement issues regarding disorder and anti-social behaviour;
4. The power of the Police, other responsible authorities or local residents and businesses to seek a review of the licence.

Objectors will be required to relate their objection to one of more of the Licensing Objectives, as specified in section 1.4 above, before the Council will be able to consider it.

The Council, in undertaking its licensing function, will have due regard to the need to eliminate unlawful discrimination and to promote equality and good relations between persons of different racial groups.

13 Licensing Authority functions

Licensing Authorities are required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing **Premises Licences**
- Issue **Provisional Statements**
- Regulate **Members' Clubs** and **Miners' Welfare Institutes** who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
- Issue **Club Machine Permits** to **Commercial Clubs**
- Grant permits for the use of certain lower stake gaming machines at **Unlicensed Family Entertainment Centres**
- Receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of up to two gaming machines
- Issue **Licensed Premises Gaming Machine Permits** for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines
- Register **Small Society Lotteries** below prescribed thresholds
- Issue **Prize Gaming Permits**

- Receive and Endorse ***Temporary Use Notices***
- Receive ***Occasional Use Notices***
- Provide information to the Gambling Commission regarding details of licences issued (see section above on 'information exchange')
- Maintain registers of the permits and licences that are issued under these functions

It should be noted that local Licensing Authorities will not be involved in licensing remote gambling at all. This will fall to the Gambling Commission via operating licences.

The Gambling Commission has recommended that Licensing Authorities include a list of licensable activities in their policy statements. LACORS has requested a definitive list from the Gambling Commission and this will be incorporated into this policy statement once provided.

PART B

PREMISES LICENCES

1 General Principles

Premises licences will be subject to the requirements set-out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions which will be detailed in regulations issued by the Secretary of State. The Licensing Authority can only consider a premises licence application where the applicant ;

- Has the right to occupy and exercise sufficient control over the premises to enforce the terms of the licence: and
- Holds or has applied for an operating licence which allows him or her to carry out the proposed activity
- It should be noted that the premises licence may only be determined once the operating licence has been issued
- The Licensing Authority will expect the applicant for a premises licence to demonstrate that they have or have applied for the appropriate operating and /or personal licences from the Gambling Commission where relevant
- Where no application for an operating licence has been made, the premises licence application will be refused.
- Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

This licensing authority is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it:

- in accordance with any relevant code of practice issued by the Gambling Commission;
- in accordance with any relevant guidance issued by the Gambling Commission ;
- to be reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of licensing policy.

It is appreciated that as per the Gambling Commission's Guidance for Licensing Authorities "moral objections to gambling are not a valid reason to reject applications for Premises Licences" and also that unmet demand is not a criterion for a Licensing Authority. The Licensing Authority recognises that in the event that it decides to resolve not to issue casino premises licences, then it may have regard to any principle or matter.

Definition of "premises" - Premises is defined in the Act as "any place". Different premises licences cannot apply in respect of a single premises at different times. However, it is possible for a single building to be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being different premises. Whether different parts of a building can properly be regarded as being separate premises will always be a question of fact in the circumstances. However, the Gambling

Commission does not consider that areas of a building that are artificially or temporarily separate can be properly regarded as different premises.

This Licensing Authority takes particular note of the Gambling Commission's Guidance for Local Authorities which states that:

- Licensing Authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular they should be aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and that people do not 'drift' into a gambling area.
- Licensing Authorities should pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed). Clearly, there will be specific issues that Authorities should consider before granting such applications, for example, whether children can gain access; compatibility of the two establishments; and ability to comply with the requirements of the Act. But, in addition an overriding consideration should be whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the Act.

It should also be noted that an applicant cannot obtain a full Premises Licence until the premises in which it is proposed to offer the gambling are constructed. The Gambling Commission has advised that reference to "the premises" are to the premises in which gambling may now take place. Thus a Licence to use premises for gambling will only be issued in relation to premises that are ready to be used for gambling. This authority agrees with the Gambling Commission that it is a question of fact and degree whether premises are finished to a degree that they can be considered for a premises licence. The Gambling Commission emphasises that requiring the building to be complete ensures that the Authority can, if necessary, inspect it fully, as can other responsible authorities with inspection rights.

Who can make Applications

An application for a Premises Licence can only be made by a person who either holds an Operating Licence authorising him to carry on the activity in respect of which a Premises Licence is sought, OR has made an application for an Operating Licence which has not yet been determined.

Location - This Licensing Authority 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. As per the Gambling Commission's Guidance for Local Authorities, this Authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. Should any specific policy be decided upon as regards areas where gambling premises should not be located, this statement will be updated. It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome.

Duplication with other regulatory regimes - This Licensing Authority will seek to avoid any duplication with other statutory/regulatory systems where possible,

including planning. This Authority will not consider whether a licence application is likely to be awarded Planning Permission or Building Regulations approval, in its consideration of it. It will though, listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise.

Licensing objectives - Premises Licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, this Licensing Authority has considered the Gambling Commission's Guidance to Local Authorities and some comments are made below.

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime - This licensing authority is aware that the Gambling Commission will be taking a leading role in preventing gambling from being a source of crime. The Gambling Commission's Guidance does however envisage that Licensing Authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, 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 such as the provision of Door Supervisors. This Licensing Authority is aware of the distinction between disorder and nuisance and will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, so as to make that distinction. Issues of nuisance cannot be addressed via the Gambling Act provisions.

In considering licence applications, the Council may, take into account the following:-

1. The design and layout of the premises;
2. The training given to staff in crime prevention measures appropriate to those premises;
3. Physical security features installed in the premises. This may include matters such as the position of cash registers or the standard of CCTV that is installed;
4. Where premises are subject to age restrictions, the procedures in place to conduct age verification checks;
5. The likelihood of any violence, public order or policing problem if the Licence is granted.

Ensuring that gambling is conducted in a fair and open way

This Licensing Authority has noted that the Gambling Commission has stated that it would generally not expect Licensing Authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences. There is however, more of a role with regard to tracks which is explained in more detail in the 'tracks' section below.

Protecting children and other vulnerable persons from being harmed or exploited by gambling - This licensing authority has noted the Gambling Commission's Guidance for Local Authorities states that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at, or are particularly attractive to children). The Licensing Authority will therefore consider, as suggested in the Gambling

Commission's Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances/machines, segregation of areas etc. Access by children or young persons to those gambling premises which are adult only environments will not be permitted.

This Licensing Authority will also make itself aware of the Codes of Practice which the Gambling Commission issues as regards the licensing objective.

As regards the term "**vulnerable persons**" it is noted that the Gambling Commission is not seeking to offer a definition but states that "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs " This licensing authority will consider this licensing objective on a case by case basis. Should a practical definition prove possible in future then this policy statement will be updated with it, by way of a revision.

Conditions - Any conditions attached to licences will be proportionate and will be:

- relevant to the need to make the proposed building suitable as a gambling facility;
- directly related to the premises and the type of licence applied for;
- fairly and reasonably related to the scale and type of premises; and
- reasonable in all other respects.

Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures this Licensing Authority will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas etc. There are specific comments made in this regard under some of the licence types below. This Licensing Authority will also expect the licence applicant to consider what if any conditions would promote the licensing objectives and to offer his/her own suggestions as to the way in which the licensing objectives can be met effectively. Conditions attached to Premises Licences will, so far as possible, reflect local crime prevention strategies. For example, closed circuit television cameras may be appropriate in certain premises.

This Licensing Authority will also consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Gambling Commission's Guidance.

This Authority will consider how best to ensure and will take reasonable steps to ensure that where category C [See table below] or above machines are on offer in premises to which children are admitted:

- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- only adults are admitted to the area where these machines are located;
- access to the area where the machines are located is supervised;

- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and
- at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

These considerations will apply to premises including buildings where multiple premises licences are applicable.

This licensing authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, this Licensing Authority will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

It is noted that there are conditions which the Licensing Authority cannot attach to Premises Licences which are:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated; and
- conditions in relation to stakes, fees, winning or prizes.

Categories of gaming machines

Section 236 of the Act provides for the Secretary of State to make regulations to define four classes of gaming machine: categories A,B,C and D, with category B to be further divided into sub-categories. The regulations will define the classes according to the maximum amount that can be paid for playing the machine and the maximum prize it can deliver. The regulations may also define the classes according to the nature of the gambling for which the machine may be used and the premises where a machine may not be used. The table below sets out the current proposals, this is subject to change and this will be updated in due course.

Category of machine	Maximum Stake	Maximum Prize
A	Unlimited	Unlimited
B1	£2	£4.000
B2	£100	£500
B3	£1	£500
B4	£1	£250
C	50p	£25
D	10p or 30p when non-monetary prize	£5 cash or £8 non-monetary prize

Door Supervisors – Casinos and Bingo premises have an exemption from the need to register door supervisors with the SIA, as required by the Private Security Industry Act 2001, by virtue of the Gambling Act 2005 Schedule 16 paragraph 17.

The Gambling Commission advises in its Guidance for Local Authorities that Licensing Authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime. It is noted though that the door supervisors at casinos or bingo premises need not be licensed by the Security Industry Authority (SIA).

For premises other than casinos and bingo premises, operators and Licensing Authorities may decide that supervision of entrances / machines is appropriate for particular cases and consideration will be given as to whether door supervisors need to be SIA licensed or not. The Licensing Authority will not assume that they need to be.

2. Adult Gaming Centres

This Licensing Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.

This Licensing Authority will expect applicants to consider how best to promote the licensing objectives and offer their own measures to meet the licensing objectives. However appropriate measures/licence conditions may cover issues such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas

3. (Licensed) Family Entertainment Centres:

This Licensing Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Authority, for example, that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas.

This Licensing Authority will expect applicants to consider how best to promote the licensing objectives and what measures they offer to meet the licensing objectives however appropriate measures / licence conditions may cover issues such as:

- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours

- Self-barring schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare.
- Measures / training for staff on how to deal with suspected truant school children on the premises

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

This licensing authority will, as per the Gambling Commission's guidance, refer to the Commission's website to see any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated. This licensing authority will also make itself aware of any mandatory or default conditions on premises licences, when they have been published.

4 **Casinos**

Proposal for a casino – There are currently no casinos operating within the Borough.

There is no resolution to prohibit casinos in the Borough at present. The Licensing Authority is aware it has the power to do so under Section 166 of the Gambling Act 2005. However the Council reserves the right to review this situation and may, at some time in the future, resolve not to permit casinos.

Should the Council choose to make such a resolution, this will be a resolution of Full Council

Where a no-casinos resolution has been made. potential licence applicants will be notified of such, and that applications for Casino Premises Licences will not be considered. Any applications received will be returned with a notification that a 'no-casino' resolution is in place.

Casinos and competitive bidding - This Licensing Authority is aware that where a Licensing Authority area is enabled to grant a Premises Licence for a new style casino (i.e. the Secretary of State has made such regulations under Section 175 of the Gambling Act 2005) there are likely to be a number of operators which will want to run the casino. In such situations the Local Authority will run a 'competition' under Schedule 9 of the Gambling Act 2005. This Licensing Authority will run such a competition in line with any regulations / codes of practice issued under the Gambling Act 2005.

Licence considerations / conditions - The Gambling Commission has stated that "further guidance will be issued in due course about the particular issues that Licensing Authorities should take into account in relation to the suitability and layout of casino premises" (Gambling Commission Guidance for Local Authorities - 17.30) This guidance will be considered by this Licensing Authority when it is made available.

Betting machines - This Licensing Authority will, as per the Gambling Commission's Guidance, take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.

5. **Bingo premises**

This Licensing Authority notes that the Gambling Commission's Guidance states:

'18.4 - It is important that if children are allowed to enter premises licensed for bingo that they do not participate in gambling, other than on category D machines. Where category C or above machines are available in premises to which children are admitted Licensing Authorities should ensure that:

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- only adults are admitted to the area where the machines are located;
- access to the area where the machines are located is supervised;
- the area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder; and
- at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

This Licensing Authority is also aware that the Gambling Commission is going to issue further guidance about the particular issues that Licensing Authorities should take into account in relation to the suitability and layout of bingo premises. This guidance will be considered by this Licensing Authority once it is made available.

6. **Betting premises**

Betting machines - This Licensing Authority will, as per the Gambling Commission's Guidance, take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.

7. **Tracks**

This Licensing Authority is aware that tracks may be subject to one or more than one Premises Licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, this Licensing Authority will give due consideration to, the impact upon all the third licensing objectives. With regard to the third licensing objective, (i.e. the protection of children and vulnerable persons from being harmed or exploited by gambling), this Licensing Authority will consider the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

This Authority will expect the Premises Licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog-racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

This Licensing Authority will expect applicants to offer their own measures to meet the licensing objectives however appropriate measures / licence conditions may cover issues such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

Gaming machines - Further guidance from the Gambling Commission is awaited as regards where such machines may be located on tracks and any special considerations that should apply in relation, for example, to supervision of the machines and preventing children from playing them. This Licensing Authority notes the Commission's Guidance that Licensing Authorities therefore need to consider the location of gaming machines at tracks, and applications for track Premises Licences will need to demonstrate that, where the applicant holds a pool betting operating licence and is going to use his entitlement to four gaming machines, these machines are located in areas from which children are excluded. Children and young persons are not prohibited from playing category D gaming machines on a track.

Betting machines - This Licensing Authority will, as per the Gambling Commission's Guidance, take into account the size of the premises and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer. It will also take note of the Gambling Commission's suggestion that Licensing Authorities will want to consider restricting the number and location of such machines in respect of applications for track betting premises licences.

Condition on rules being displayed - The Gambling Commission has advised in its Guidance for Local Authorities that "...Licensing Authorities should attach a condition to track premises licences requiring the track operator to ensure that the rules are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public. For example, the rules could be printed in the race-card or made available in leaflet form from the track office."

Applications and plans - This Licensing Authority awaits regulations setting-out any specific requirements for applications for Premises Licences but is in accordance

with the Gambling Commission's suggestion "To ensure that Licensing Authorities gain a proper understanding of what they are being asked to license they should, in their licensing policies, set out the information that they will require, which should include detailed plans for the racetrack itself and the area that will be used for temporary "on-course" betting facilities (often known as the "betting ring") and in the case of dog tracks and horse racecourses fixed and mobile pool betting facilities operated by the Tote or track operator, as well as any other proposed gambling facilities." and that "Plans should make clear what is being sought for authorisation under the track betting premises licence and what, if any, other areas are to be subject to a separate application for a different type of Premises Licence."

This Licensing Authority also notes that in the Commission's view, it would be preferable for all self-contained premises operated by off-course betting operators on track to be the subject of separate Premises Licences, to ensure that there is clarity between the respective responsibilities of the track operator and the off-course betting operator running a self-contained unit on the premises.

8. Travelling Fairs

It will fall to this Licensing Authority to decide whether, where category D machines and / or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

The Licensing Authority will also consider whether the applicant falls within the statutory definition of a travelling fair.

It has been noted that the 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. This Licensing Authority will work with its neighbouring authorities to ensure that land which crosses our boundaries is monitored so that the statutory limits are not exceeded.

9. Provisional Statements

This Licensing Authority notes the Guidance for the Gambling Commission which states that "It is a question of fact and degree whether premises are finished to a degree that they can be considered for a Premises Licence" and that "Requiring the building to be complete ensures that the Authority could, if necessary, inspect it fully".

In terms of representations about Premises Licence applications, following the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless they concern matters which could not have been addressed at the provisional statement stage, or they reflect a change in the applicant's circumstances. In addition, the Authority may refuse the Premises Licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- (a) which could not have been raised by objectors at the provisional licence stage; or
- (b) which is in the Authority's opinion reflect a change in the operator's circumstances.

This Authority has noted the Gambling Commission's Guidance that "A Licensing Authority should not take into account irrelevant matters.... One example of an

irrelevant matter would be the likelihood of the applicant obtaining planning permission or building regulations approval for the proposal."

PART C

PERMITS / TEMPORARY & OCCASIONAL USE NOTICE

1. **Unlicensed Family Entertainment Centre gaming machine permits (Statement of Principles on Permits - Schedule 10 paragraph 7)**

Where a premises does not hold a Premises Licence but wishes to provide gaming machines, it may apply to the Licensing Authority for this permit. It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (Section 238).

The Gambling Act 2005 states that a Licensing Authority may prepare a *statement of principles* that they propose to consider in determining the suitability of an applicant for a permit and in preparing this statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission under section 25. The Gambling Commission's Guidance for Local Authorities also states: "In their three year licensing policy statement, Licensing Authorities may include a statement of principles that they propose to apply when exercising their functions in considering applications for permits...., Licensing Authorities will want to give weight to child protection issues." (24.6)

Guidance also states: "...An application for a permit may be granted only if the Licensing Authority is satisfied that the premises will be used as an unlicensed FEC, and if the Chief Officer of Police has been consulted on the application....Licensing Authorities might wish to consider asking applications to demonstrate:

- a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs;
- that the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act; and
- that staff are trained to have a full understanding of the maximum stakes and prizes. (24.7)

It should be noted that a Licensing Authority cannot attach conditions to this type of permit.

Statement of Principles This Licensing Authority will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits, however, they may include appropriate measures / training for staff as regards suspected truant school children on the premises, measures / training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on / around the premises. This Licensing Authority will also expect, as per Gambling Commission Guidance, that applicants demonstrate a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs; that the applicant has no relevant convictions (those that are set out in Schedule 7 of

the Act); and that staff are trained to have a full understanding of the maximum stakes and prizes.

2. (Alcohol) Licensed premises gaming machine permits - (Schedule 13 paragraph 4(1))

There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have 2 gaming machines, of categories C and/or D. The premises merely need to notify the Licensing Authority. The Licensing Authority can remove the automatic authorisation in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (i.e. that written notice has been provided to the Licensing Authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with);
- the premises are mainly used for gaming; or
- an offence under the Gambling Act has been committed on the premises.

If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and “*such matters as they think relevant.*” This Licensing Authority considers that “such matters” will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harmed or being exploited by gambling and will expect the applicant to satisfy the Authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machines. Measures which will satisfy the Authority that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also be help. As regards the protection of vulnerable persons applicants may wish to consider the provision of information leaflets / helpline numbers for organisations such as GamCare.

It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with as an Adult Gaming Centre premises licence.

It should be noted that the Licensing Authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.

It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

3. Prize Gaming Permits - (Statement of Principles on Permits - Schedule 14 paragraph 8 (3))

The Gambling Act 2005 states that a Licensing Authority may “*prepare a statement of principles that they propose to apply in exercising their functions under this Schedule*” which “*may, in particular, specify matters that the Licensing Authority propose to consider in determining the suitability of the applicant for a permit*”.

This Licensing Authority has prepared a **Statement of Principles** which is that the applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:

- that they understand the limits to stakes and prizes that are set out in Regulations;
- and that the gaming offered is within the law.

In making its decision on an application for this permit the Licensing Authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.

It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the Licensing Authority cannot attach conditions. The conditions in the Act are:

- the limits on participation fees, as set out in regulations, must be complied with;
- all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- participation in the gaming must not entitle the player to take part in any other gambling.

4. Club Gaming and Club Machines Permits

Members Clubs and Miners’ welfare institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Clubs Gaming machines permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set-out in forthcoming regulations. A Club Gaming machine permit will enable the premises to provide gaming machines (3 machines of categories B, C or D).

Gambling Commission Guidance states: "Members clubs must have at least 25 members and be established and conducted “wholly or mainly” for purposes other than gaming, unless the gaming is permitted by separate regulations. It is anticipated that this will cover bridge and whist clubs, which will replicate the position under the Gaming Act 1968. A members’ club must be permanent in nature, not established to make commercial profit, and controlled by its members equally. Examples include working men’s clubs, branches of Royal British Legion and clubs with political affiliations."

The Commission Guidance also notes that "Licensing Authorities may only refuse an application on the grounds that:

- (a) the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
- (b) the applicant's premises are used wholly or mainly by children and/or young persons;
- (c) an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;
- (d) a permit held by the applicant has been cancelled in the previous ten years;
or
- (e) an objection has been lodged by the Commission or the police.

There is also a 'fast-track' procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). As the Gambling Commission's Guidance for local authorities states: "Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the ground upon which an Authority can refuse a permit are reduced." and "The grounds on which an application under the process may be refused are:

- (a) that the club is established primarily for gaming, other than gaming prescribed under schedule 12;
- (b) that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
- (c) that a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

5. Temporary Use Notices

There are a number of statutory limits as regards temporary use notices. Gambling Commission Guidance is noted that "The meaning of "premises" in part 8 of the Act is discussed in Part 7 of this guidance. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place". In considering whether a place falls within the definition of "a set of premises", Licensing Authorities will need to look at, amongst other things, the ownership/occupation and control of the premises...This is a new permission and Licensing Authorities should be ready to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises."

6. Occasional Use Notices:

The Licensing Authority has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. This

Licensing Authority will though consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

1. Transitional Arrangements

During the transitional arrangements period specified in the Act, a Premises Licence will be issued to persons applying under an Order made by the Secretary of State under Schedule 18 of the Act, who have supplied the required information, documentation and fee. Issue of licences will be on the basis of existing permissions being continued. If however, the Police make a representation that the conversion of an existing licence would undermine the crime prevention and disorder objective, the licence will be referred to the Council's Licensing Sub-Committee for consideration.

2. Consultees

The Statement of Licensing Policy was subject to formal consultation with:-

1. The Chief Officer of the Metropolitan Police for Haringey;
2. Persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area;
3. Persons/bodies who appear to the authority to represent the interests of persons likely to be affected by the exercise of the authority's function under The Gambling Act 2005.

A full list of consultees can be provided on request from the Licensing Team

3 LEGISLATION, POLICIES AND STRATEGIES

3.1 Legislation

In undertaking its licensing function under the Gambling Act 2005, the Council is also bound by other legislation, including:-

1. Section 17 of the Crime and Disorder Act 1988;
2. Human Rights Act 1998;
3. Health and Safety at Work Act 1974;
4. Environmental Protection Act 1990;
5. The Anti-Social Behaviour Act 2003;
6. The Race Relations Act 1976 (as amended);

However, the policy is not intended to duplicate existing legislation and regulation regimes that already place obligations on employers and operators.

3.2 Relationship with Planning Policies

When determining an application, the Licensing Authority cannot take into account “irrelevant matters” such as the likelihood of the applicant obtaining planning permission or building control approval.

An applicant can apply for a “provisional statement” if the building is not complete or if he does not yet have a right to occupy it. Such an application is, however, a separate and distinct process to the granting of planning permission or building control approval.

3.3 National Strategies

The Council will also seek to discharge its responsibilities identified by other Government Strategies, in so far as they impact on the objectives of the licensing function.

3.4 Local Strategies and Policies

Where appropriate, the Council will consider applications with reference to other adopted local strategies and policies, including the following:-

1. The Council's Community Strategy; 2003-2007
2. The Haringey Safer Communities Strategy: 2005-2008
3. Enforcement Policies.

4. Integrating Strategies

There are many stakeholders involved in the Leisure industry and many are involved in the promotion of the licensing objectives. A number of stakeholders' plans and strategies deal with matters related to the licensing function. Where this is the case, the Council will aim, as far as possible, to co-ordinate them.

The Council considers that where appropriate and in so far as is consistent with the Gambling Act, Guidance and Codes of Practice issued under sections 24 and 25 of the Gambling Act 2005, it is desirable that this Policy complements other relevant plans and strategies aimed at the management of town centres and the night-time economy.

Relevant plans and strategies include:-

- ❖ Crime and Disorder Strategy – The Council will fulfil its duty under section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in the Borough. As far as possible, licensing decisions will aim to contribute to the targets set in the Crime and Disorder Strategy and conditions attached to licences and certificates will reflect local crime prevention strategies.
- ❖ Safer Communities Strategy

The Community Safety Strategy is committed to tackling the key areas of crime and building prevention initiatives into neighbourhoods. The licensing authority will support the work of the Safer Communities Strategy within the scope of the licensing objectives under the Act

- ❖ Haringey Council – A Community Plan – As far as possible, any licensing decisions will be in line with the aspirations of this community plan.
- ❖ Local Transport Plan – the Council aims to work with the local transport authority and will consider ways in which the public can be dispersed from licensed premises and events so as to avoid disturbance, crime and disorder. The Police will be encouraged to report on matters related to the swift and safe dispersal of people from licensed premises.
- ❖ Racial Equality – The Council is required under race relations legislation to have due regard to the need to eliminate unlawful discrimination and to promote equality of opportunity and good relations between persons of different racial groups. The impact on these issues of the Gambling Policy will be monitored and amendments will be made as necessary.
- ❖ Domestic Violence Strategy – The Council will ensure consultation to ensure that any correlation between gambling and domestic violence can be detected at the earliest opportunity.
- ❖ Alcohol Strategy – The Council will as far as possible have regard to this strategy and conditions attached to licences and certificates will reflect the key elements of this strategy.
- ❖ Children and Young Persons Strategy – The Council will have regard to the impact on this strategy and the criteria for safeguarding children from becoming addicted.
- ❖ Anti-Poverty Strategy – As far as possible, any licensing decisions will have regard to this strategy. It will support the work of the Anti Poverty Strategy as they are developed within the scope of the licensing objectives under the Act.
- ❖ Human Rights – The Human Rights Act 1998 incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way which is incompatible with a Convention right. The Council will have particular regard to the following relevant provisions of the European Convention on Human Rights:-
 - Article 6 that in the determination of civil rights and obligations, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law;
 - Article 8 that everyone has the right to respect for his home and private and family life;
 - Article 1 of the First Protocol that every person is entitled to the peaceful enjoyment of his or her possessions, including for example the possession of a licence.
- ❖ Proper integration will be assured by the Licensing Authority's Licensing Committee providing reports, when appropriate, to its Planning Committee on the situation regarding licensed premises in the area, including the general impact of gambling related crime and disorder, to enable the Planning Committee to have regard to such matters when taking its decisions.
- ❖ The Council will ensure that the Licensing Committee receives reports, when appropriate, on the needs of the local tourist economy to ensure that these are reflected in their considerations.

- ❖ Economic Strategies – The Council will ensure that the Licensing Committee is appraised of the employment situation in the area and the need for new investment and employment where appropriate.

- ❖ Enforcement Policy – All licensing enforcement will be conducted in accordance with the Enforcement Concordat, and the Haringey Enforcement Policy.

These links to other corporate strategies will be formulated in detail as a result of the consultation process.

5 DECISION MAKING

5.1 Committee Terms of Reference

A Licensing Sub-Committee of Councillors will sit to hear applications where representations have been received from interested parties and responsible authorities. Ward Councillors will not sit on a Sub-Committee involving an application within their ward.

The Licensing Committee will also sit to determine general licensing matters that have been delegated to it by the full Council that are not associated with the Gambling Act 2005.

Where a Councillor who is a member of the Licensing Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision making process affecting the licence in question.

The Licensing Sub-Committee will also refer to the Licensing Committee any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it.

The Licensing Committee will refer to the full Council any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it.

Every determination of a licensing decision by the Licensing Committee or a Licensing Sub-Committee shall be accompanied by clear, cogent reasons for the decision. The decision and the reasons for that decision will be sent to the applicant and those who have made relevant representations as soon as practicable. A summary of the decision shall also be posted on the Council's website as soon as possible after the decision has been confirmed, where it will form part of the statutory licensing register required to be kept by the Council.

The Council's Licensing Officers will deal with all other licensing applications where either no representations have been received, or where representations are irrelevant, frivolous or vexatious will be made by Council Officers, who will make the decisions on whether representations or applications for licence reviews should be

referred to the Licensing Committee or Sub-Committee. Where representations are rejected, the person making that representation will be given written reasons as to why that is the case. There is no right of appeal against a determination that representations are not admissible.

5.2 Allocation of Decision Making Responsibilities

The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them.

Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, the Committee has delegated certain decisions and functions and has established a Sub-Committee to deal with them.

Many of the decisions and functions will be purely administrative in nature and the grant of non-contentious applications, including for example those licences and permits where no representations have been made, will be delegated to Council Officers.

The table shown at Appendix A sets out the agreed delegation of decisions and functions to Licensing Committee, Sub-Committee and Officers.

This form of delegation is without prejudice to Officers referring an application to a Sub-Committee or Full Committee if considered appropriate in the circumstances of any particular case.

5.3 Licensing Reviews

The Council will carry out a review of a Premises Licence where it has received a formal application for review in accordance with the Act that is relevant to one of more of the Licensing Objectives and is relevant to the matters listed below,

- in accordance with any relevant code of practice issued by the Gambling Commission;
- in accordance with any relevant guidance issued by the Gambling Commission;
- reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of licensing policy.

Representations may include issues relating to the following:-

1. Use of licensed premises for the sale and distribution of class A drugs and/or the laundering of the proceeds of drugs crimes;
2. Use of licensed premises for the sale and distribution of illegal firearms;
3. Use of licensed premises for prostitution or the sale of unlawful pornography;
4. Use of licensed premises as a base for organised crime activity;

5. Use of licensed premises for the organisation of racist, homophobic or sexual abuse or attacks;
6. Use of licensed premises for the sale of smuggled tobacco or goods;
7. Use of licensed premises for the sale of stolen goods;
8. Children and/or vulnerable persons being put at risk.

Due consideration will be given to all relevant representations unless they fit the following:-

- (a) The grounds are frivolous;
- (b) The grounds are vexatious;
- (c) The grounds are irrelevant;
- (d) The grounds will not cause the Licensing Authority to revoke or suspend a licence or to remove, amend or attach conditions on the premises licence;
- (d) The grounds will not cause the Licensing Authority to revoke or suspend a licence or to remove, amend or attach conditions on the premises licence;
- (e) The grounds are substantially the same as the grounds cited in a previous application relating to the same premises; or
- (f) The grounds are substantially the same as representations made at the time the application for a premises licence was considered.

A premises licence may also be reviewed by the Licensing Authority of its own volition.

6. LOCAL STANDARDS

6.1 Enforcement

The Council is a signatory to the Enforcement Concordat and will follow the principles set out in it. The concordat is based around the principles of consistency, transparency and proportionality.

The Enforcement Concordat (available upon request) proposes that a graduated response is taken where offences against legislation are found or where licence conditions have been contravened. An isolated administrative offence, such as failing to maintain certain records, may be dealt with by way of a written warning. More serious offences may result in a referral to Sub-Committee, the issue of a Formal Caution or a referral for prosecution.

The Council intends to use appropriate enforcement to promote the licensing objectives. Once licensed, it is essential that premises are monitored to ensure that they are run in accordance with their operating schedules, in compliance with the specific requirements of the Act and in compliance with any licence conditions. It will also be important to monitor the Borough for unlicensed premises.

The Council will seek to work actively with the Police in enforcing licensing legislation and intends to establish protocols with the Metropolitan Police and, Haringey Trading Standards Department and London Fire and Emergency Planning Authority on enforcement issues to ensure an efficient deployment of police and council officers.

7. COMPLAINTS AGAINST LICENSED PREMISES

The Council will investigate complaints against licensed premises in relation to matters relating to the licensing objectives for which it has responsibility. In the first instance, complainants are encourage to raise the complaint directly with the licence holder or business concerned to seek a local resolution.

Where an interested party has made either a valid representation about licensed premises or a valid application for a licence to be reviewed, the Council may initially arrange a conciliation meeting to address and clarify the issues of concern.

This process will not override the right of any interested party to ask that the licensing committee consider their valid objections, or for any licence holder to decline to participate in a conciliation meeting.

Due consideration will be given to all relevant representations unless they fit the exceptions in 3.3 above.

8 FURTHER INFORMATION

Further information about the Gambling Act 2005, this Statement of Gambling Policy or the application process can be obtained from:-

***Licensing Unit
Commercial and Environmental Protection Group
Civic Centre
High Road, Wood Green
LONDON
N22 8LE***

***Tel: 020 8489 8232 Fax: 020 8489 5528
E-mail: licensing@haringey.gov.uk***

Information is also available from:-

***Gambling Commission
Berkshire House
168-173 High Holborn
LONDON
WC1V 7AA***

***Tel: 020 7306 6219
Website: www.gamblingcommission.gov.uk***

APPENDIX A

TABLE OF DELEGATIONS OF LICENSING FUNCTIONS

MATTER TO BE DEALT WITH	FULL COUNCIL	SUB-COMMITTEE	OFFICERS
Three year licensing policy	X		
Policy not to permit casinos	X		
Fee Setting - when appropriate			If the Council has any discretion under the Regs, the it will be for officers to propose and for Licensing Committee to approve.
Application for premises licences		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a variation to a licence		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a transfer of a licence		Where representations have been received from the Commission	Where no representations received from the Commission
Application for a provisional statement		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Review of a premises licence			The initial grounds for review will be for officers to validate. Licensing Sub Committee will then hear the review if the grounds are valid under s.198
Application for club gaming /club machine permits		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Cancellation of club gaming/ club machine permits			Cancellation of club gaming /machine permits and other permits decisions would be appropriate for officers.
Applications for other permits			Dealt with by officers
Cancellation of licensed premises			Dealt with by officers

gaming machine permits			
Consideration of temporary use notice			Officers would initially object to applications that did not reach the required criteria
Decision to give a counter notice to a temporary use notice		X	Delegated to officers because of time constraints. In difficult cases the Chair of The Licensing Committee could be consulted.



06/07/08/09

Industry statistics 2008/09

**GAMBLING
COMMISSION**

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Gambling industry data

The data

- Detailed statistics relating to the gambling industry in Great Britain have been collated from a range of sources including the Gambling Commission (the Commission), gambling industry trade bodies, the Department for Culture, Media and Sport (DCMS) and Her Majesty's Revenue & Customs (HMRC).
- A substantial amount of the information in this paper is taken from data in the regulatory returns that all licensed gambling operators must submit on either an annual or quarterly basis. Statistics taken from the regulatory returns are provisional and have been adjusted to relate to the full calendar year 2008 (see Appendix 1 for details).
- The information contained in this document covers betting, bingo, casinos, gaming machines and arcades, lotteries and remote gambling. It does not cover the National Lottery (except as a comparison) or spread betting.
- Statistics and information relating to the Commission and its activities are contained in the annual report for the financial year 1 April 2008 to 31 March 2009, available on the Commission website.

The gambling industry

The gambling industry in Great Britain is substantial, with a turnover of over £84 billion in 2006/07. Gross gambling yield (ie the amount retained by operators after the payment of winnings but before the deduction of the costs of the operation) was estimated at £9.9 billion in 2006/07. 25% of this £9.9 billion was generated by the National Lottery and most of the remainder by those industries which are regulated by the Commission.¹

Gamblers

A prevalence survey commissioned by the Commission sampled over 9,000 adults between 2006 and 2007 and was published in September 2007. It showed that 68% of the population (about 32 million adults) had participated in some form of gambling activity within the past year. Excluding people who had only gambled on the National Lottery in the last year, 48% of the population (about 23 million adults) had participated in another form of gambling in the past year.

The most popular gambling activities in Britain in 2007 were The National Lottery Draw (57% had participated in the past year), scratchcards (20%), betting on horse races (17%) and playing slot machines (14%). Only a small proportion of people took part in the new forms of gambling available in Great Britain: for example 6% of people used the internet to gamble (3% did online gaming like playing poker or casino games and 4% placed bets with a bookmaker) (See under Remote Gambling for current statistics on remote participation).

A further prevalence survey is planned for 2009/10 and will be published in the autumn 2010.

Problem gambling

The 2007 prevalence survey found that the rate of problem gambling in the adult population was about 0.6%² (about 284,000 adults). This is the same percentage of the population as identified in an earlier survey published in 1999.

¹ HM Revenue & Customs Statistical Bulletins

² To tolerance limits 0.5%-0.8%

Betting

Structure of the betting industry

The betting industry is made up of both on course and off course betting operators. As at 31 March 2009, the Commission had issued 714 on course general betting licences and 720 off course general betting licences.

This industry is dominated by five operators that account for approximately 7,262 (over 80%) of all betting shops. The approximate numbers of betting shops (excluding Northern Ireland) operated by each of these operators is as follows:

as at 31 March 2009	
Organisation	Total betting shops ³
Ladbrokes	2,080
William Hill	2,228
Coral	1,630
Betfred	808
Tote	516
Other ⁴	approx 1,600
Total	8,862

Information taken from regulatory returns 1 January 2008 to 31 December 2008

Number of employees (FTE ⁵)	43,133
Number of employees (headcount)	57,613

Off course returns

	Turnover £ million	Gross profit £ million	Number of bets million
Dogs	1,646.8	312.2	246.8
Football	980.0	221.8	150.7
Horses	6,401.6	891.6	748.4
Number	874.6	168.3	321.1
Other	913.9	123.2	77.3
Total	10,816.9	1,717.1	1,544.3

On course returns

Number of on course operator days	43,376
-----------------------------------	---------------

	Turnover £ million	Gross profit £ million
Dogs	72.90	7.30
Horses	759.30	29.10
Other	12.60	1.00
Total	844.80	37.40

³ Figures for the major five bookmakers obtained from the companies concerned

⁴ Figures taken from Local Authority returns to the Commission

⁵ Full time equivalent

Pool betting returns

	Turnover £ million	Gross profit £ million
Dogs	53.9	14.7
Football	59.3	46.6
Horses	368.1	81.6
Other	1	0.2
Total	482.4	143.1

Gross profit from gaming machines in betting shops**£1,138 million****The number of self exclusions recorded by operators**

Self exclusions	10,281
Known breaches of self exclusion	3,362
Number of individuals who cancelled their self exclusion after minimum exclusion period	964

The numbers of people who have self excluded and the numbers of people who have cancelled their self-exclusion may be lower than these figures as individuals may have self excluded from more than one venue and thus been counted more than once. The number of breaches represents the numbers of separate incidents, rather than the number of individuals.

Under-age gambling

There were 85,097 recorded incidents when someone under the age of 18 entered a betting premises and 22,202 recorded incidents when someone under age gambled on a betting premises before their age was ascertained.

Integrity in Betting

48 cases of suspicious betting activity were reported to the Commission between 1 September 2007 and 31 March 2009. Of these, 31 were reported by betting operators under licence condition 15.1 with 17 coming from other sources, for example sports governing bodies, the media or the public.

In 22 of these cases the grounds for suspicion have not been substantiated following an initial consideration. A breakdown of the activities involved in those cases is provided below. Of the remainder, 15 cases have been passed to the relevant sports governing body for investigation and there are 11 active investigations in which the Commission is further involved.

Suspicious betting activity 1 September 2007 to 31 March 2009	
Activity	Cases closed
Football	7
Horseracing	5
Snooker	2
Bowls	1
Greyhound racing	2
Darts	1
Golf	1
Tennis	1
Non-sport	2
Total	22

Bingo

Structure of the bingo industry

There were 216⁶ bingo operators licensed by the Commission at 31 March 2009 operating 641 clubs, against 222⁴ operators with 675 clubs at 31 March 2008. Gala Bingo and Mecca Bingo between them own over 40% of the clubs.

as at 31 March 2009		
Organisation	Total bingo clubs	% of total
Buckingham Bingo	11	1.7
Carlton Clubs	14	2.2
Gala Bingo	158	24.6
Mecca Bingo	102	15.9
Riva Bingo	13	2.0
Top Ten Bingo	36	5.6
Independent/small operators	307	48.0
Total	641	100.0

Information taken from regulatory returns 1 January 2008 to 31 December 2008

Number of employees (FTE⁷) **14,337**
 Number of employees (headcount) **16,926**

1 January 2008 to 31 December 2008	Gross gaming sales £ million	Participation fees £ million
Main Stage Bingo Games	958.9	171.4
Mechanised Cash Bingo	541.5	265.4
National Game	63.0	10.6
Prize Bingo	139.1	75.6
Total	1,702.5	523.0

1 April to 31 March	Gross gaming sales £ million ⁴	% change from previous year
2004/2005	1,783	23.4
2005/2006	1,826	2.4
2006/2007	1,820	(0.3)
2007/2008	1,620	(11.0)
2008/2009	1,694 ⁸	4.6

Gross profit from gaming machines in bingo clubs **£214 million**

The number of self exclusions recorded by operators

Self exclusions **272**
 Known breaches of self exclusion **25**
 Number of individuals who cancelled their self exclusion after minimum exclusion period **65**

The numbers of people who have self excluded and the numbers of people who have cancelled their self-exclusion may be lower than these figures as individuals may have self excluded from more than one venue and thus been counted more than once. The number of breaches represents the numbers of separate incidents, rather than the number of individuals.

Under-age gambling

There were 8 recorded incidents when someone under the age of 18 gambled on a bingo premises before their age was ascertained.

⁶ These figures do not cover remote bingo (see section on Remote Gambling)

⁷ Full time equivalent

⁸ Figures provided for the fiscal year to provide comparative with previously published data

Casinos

Structure of the casino industry

There were 143 casinos and two card clubs operating at 31 March 2009. The casino industry remains dominated by three companies, namely the Gala Group with 27 casinos, Grosvenor Casinos (part of Rank plc) with 32 casinos and Genting Casinos Ltd with 45 casinos.

A total of 16 new casinos are proposed under the Gambling Act 2005 (2005 Act). Three operators hold licences that would enable them to open one of these new casinos but to date none are operating. This is due to the fact that a bidding process has to be undertaken with the relevant local authority before any such casino can be established (see below for details).

Casino ownership by operator

as at 31 March 2009	
Organisation	Total casinos
Gala	27
Rank (Grosvenor and 'G' Casinos)	32
London Clubs International	11
A & S Leisure	6
Genting Casinos	45
Aspinalls	4
Blue Chip	3
Clockfair	2
Individual operators including 2 card clubs	15
Total	145

Information taken from regulatory returns 1 January 2008 to 31 December 2008

Number of employees (FTE ⁹)	12,843
Number of employees (headcount)	14,204

Casino attendance

There were over 16.6 million visits to casinos in Great Britain between April 2008 and March 2009, an increase of 400,000 over the previous year.

	Scotland	North	Midlands & Wales	South	Provinces sub total	London	Total
	millions						
2006/07	1.2	4.7	3.2	3.0	12.1	3.0	15.1
2007/08	1.3	4.8	3.7	3.1	12.9	3.3	16.2
2008/09	1.5	4.7	3.9	2.9	13.0	3.6	16.6

Gross profit from gaming machines in casinos

£120.5 million

The number of self exclusions recorded by operators

Self exclusions	6,049
Known breaches of self exclusion	268
Number of individuals who cancelled their self exclusion after minimum exclusion period	733

The numbers of people who have self excluded and the numbers of people who have cancelled their self-exclusion may be lower than these figures as individuals may have self excluded from more than one venue and thus been counted more than once. The number of breaches represents the numbers of separate incidents, rather than the number of individuals.

⁹ Full time equivalent

Casinos

Under-age gambling

There were 44 recorded incidents when someone under the age of 18 entered a casino and 11 recorded incidents when someone under age gambled in a casino before their age was ascertained.

Total Drop and Win by year¹⁰ and by region

Both the total drop and the total house win have increased slightly during the year.

Region	Casinos operating	Year 1 April to 31 March	Drop £	House win £	House win %
Scotland	14	2008/2009	211,792,008	34,087,154	16.1
	14	2007/2008	201,271,517	32,426,333	16.1
North	38	2008/2009	668,766,748	95,713,253	14.3
	38	2007/2008	671,739,380	102,232,209	15.2
Midlands and Wales	38	2008/2009	588,138,782	84,134,951	14.3
	36	2007/2008	592,057,557	87,286,152	14.7
South	28	2008/2009	415,281,530	66,111,971	15.9
	30	2007/2008	469,086,278	73,967,495	15.8
Provinces sub total	118	2008/2009	1,883,979,068	280,047,329	14.9
	118	2007/2008	1,934,154,732	295,912,189	15.3
London	25	2008/2009	2,645,252,219	398,568,996	15.1
	26	2007/2008	2,497,666,864	360,646,655	14.4
Great Britain total	143	2008/2009	4,529,231,287	678,616,325	15.0
	144	2007/2008	4,431,821,596	656,558,844	14.8

The drop figures above do not include monies wagered on the Casino Stud Poker progressive jackpot

Total drop by game

1 April to 31 March	Electronic Roulette £million	American Roulette £million	Blackjack £ million	Trial and other games £ million	Casino Stud Poker £million	Craps £million	Punto Banco £million	Three Card Poker £million	Total £million
2007/08	702.2	2,195.8	794.3	19.1	25.6	21.1	368.3	219.8	4,346.5
2008/09	718.3	2,248.9	775.1	36.6	14.8	17.9	367.3	202.8	4,428.0

¹⁰ Drop = money exchanged for gaming chips. Win/house win = amount retained by the casino

Location of casinos

2005 Act casinos

Under Section 175(4) of the Gambling Act 2005 the areas determined as potential locations for casinos under the 2005 Gambling Act are as follows.

One large casino can be permitted to be licensed in each of the following areas:

- Great Yarmouth
- Kingston-upon-Hull
- Leeds
- Middlesbrough
- Milton Keynes
- Newham
- Solihull
- Southampton.

One small casino can be permitted to be licensed in each of the following areas:

- Bath and North East Somerset
- Dumfries and Galloway
- East Lindsey
- Luton
- Scarborough
- Swansea
- Torbay
- Wolverhampton.

1968 Act casinos - licences not operational as at 31 March 2009

- 14 licensed but closed.
- 31 licensed but not operating (of which 4 are extensions to; or replacements for, existing licences)
- 1 awaiting outcome of licensing application.
- 5 appealing or considering an appeal against refusal of licence application by local authority.

The position at 31 March 2009 was that if all outstanding applications were successful and the licences became operational there would be a theoretical maximum of 192 1968 Act casinos including six card clubs.

Casinos

1968 Act casino permitted areas

Areas in which the licensing of premises for casino gaming is permitted showing the number of licensed clubs operating on 31 March 2008 and 31 March 2009.

Licensing Area	31 March 2008	31 March 2009	Licensing Area	31 March 2008	31 March 2009
England					
Birkenhead	1	1	Northampton	2	4
Birmingham	7	7	Nottingham	4	5
Blackpool	3	3	Plymouth	2	2
Bolton	2	2	Portsmouth & Southsea	3	3
Bournemouth	2	2	Ramsgate	1	1
Bradford	2	2	Reading	2	2
Brighton	3	3	Ryde	0	0
Bristol	5	3	Salford	2	2
Coventry	3	3	Sandown/Shanklin	0	0
Derby	2	2	Scarborough	1	1
Dudley	1	1	Sheffield	3	3
Great Yarmouth	3	3	Southampton	3	3
Hove	1	1	Southend-on-sea	3	3
Huddersfield	1	1	Southport	1	1
Kingston-upon-Hull	2	2	Stockport	2	2
Leeds	4	4	Stoke-on-Trent	2	2
Leicester	3	3	Sunderland	1	1
Liverpool	3	3	Teesside	1	1
Luton	3	3	Torbay (Torquay)	1	1
Lytham St Annes	0	0	Walsall	1	1
Manchester	6	6	Warley	0	0
Margate	2	2	West Bromwich	1	1
Newcastle-upon-Tyne	3	3	Wolverhampton	2	2
Wales			London	26	25
Cardiff	3	3			
Swansea	2	2			
Scotland					
Aberdeen	3	4			
Dundee	1	1			
Edinburgh	4	4			
Glasgow	5	5			
Total number of operating casinos				144	145

Gaming machines including arcades

Structure of the industry

		as at 31 March 2009	as at 31 March 2008
1968 Act	Section 27 certificate holders ¹¹	367	439
2005 Act	Machine manufacturers	76	93
	Machine suppliers	224	146
	Adult Gaming Centre (AGC)	632	601
	Family Entertainment Centre (FEC)	319	336
Total		1,618	1,615

Category of machine	Previously classed as:	Maximum stakes and prizes			
		Stake to 31 May 2009	Prize to 31 May 2009	Stake from 1 June 2009	Prize from 1 June 2009
A	jackpot machines	unlimited	unlimited	unlimited	unlimited
B1		£2	£4,000	£2	£4,000
B2	fixed odds betting terminals (FOBTs)	£100	£500	£100	£500
B3	jackpot machines	£1	£500	£1	£500
B4		£1	£250	£1	£250
C		50p	£35	£1	£70
D	amusement with prizes machines	10p if prize contains cash 30p if prize is wholly non cash	£5 cash or £8 non cash or mix of up to £8 in total with up to £5 cash	10p if prize contains cash 30p if prize is wholly non cash	£5 cash or £8 non cash or mix of up to £8 in total with up to £5 cash
D Pusher	new category	-	-	10p	£8 cash or £15 non cash or mix of up to £15 in total with up to £8 cash
D Crane grab	new category	-	-	£1	£50 non cash only

It is estimated by the British Amusement Catering Trade Association (BACTA) that there were over 248,000 gaming machines available to the public at 31 March 2009.

Machines publicly available at 31 March 2009	A	B1	B2	B3	B4	C	D
'000s	0	2.5	27.5	11.8	15.0	121.0	71.0
Annual change	%	-	+24	+1.9	-1.7	-11.8	-7.6

Adult gaming centres (AGC) and family entertainment centres (FEC)

The four main operators running adult gaming centres and family entertainment centres are:

- Nobles
- Shipley Leisure
- Talarius
- Agora

Gaming machine manufacturers

The primary business of machine manufacturers is the design and manufacture of new game concepts for machines in cat B-D, including cranes and pushers. Major manufacturers include:

- Barcrest / IGT/Cyberview
- Bell Fruit (Danoptra)
- Astra Novomatic
- Inspired Group (Leisure Link)
- Global Draw (Scientific Games)

¹¹ Section 27 certificate holders must apply for an operating licence under the 2005 Act when their certificate expires

Gaming machines including arcades

Gaming machine suppliers

The primary business of machine suppliers is the supply and maintenance of gaming machines on behalf of the operator, usually on a rental basis. Major suppliers include:

- Crown Leisure
- Gamestec (Danoptra)
- Inspired Group (Leisure Link)
- Sceptre Leisure

Information taken from regulatory returns 1 January 2008 to 31 December 2008

	AGC	FEC
Number of employees (FTE ¹²)	10,321	4,935
Number of employees (headcount)	19,396	5,733
Number of casual workers ¹³	min 1,154 max 3,376	min 1,064 max 2,911

Gross profit from gaming machines

AGC	FEC
£397.4 million	£92.1 million

The number of self exclusions recorded by operators

	AGC	FEC
Self exclusions	2,254	201
Known breaches of self exclusion	132	9
Number of individuals who cancelled their self exclusion after minimum exclusion period	513	67

The numbers of people who have self excluded and the numbers of people who have cancelled their self-exclusion may be lower than these figures as individuals may have self excluded from more than one venue and thus been counted more than once. The number of breaches represents the numbers of separate incidents, rather than the number of individuals.

Under-age gambling

There were 4,304 recorded incidents when someone under the age of 18 entered an AGC. Children are permitted to enter FECs.

There were 313 recorded incidents when someone under 18 years of age gambled in an AGC before their age was ascertained, and 157 recorded incidents when someone under 18 years of age gambled on prohibited machines in an FEC before their age was ascertained.

Permits

The Commission issued 2 single machine permits under section 250 of the 2005 Act between 1 April 2008 and 31 March 2009. It is Commission policy to issue such permits to allow for "one off" isolated transactions involving the disposal of gaming machines by persons not normally in the trade. It is not intended that these permits should be issued on a regular or continuing basis to a person or business involved in the frequent sale, supply or maintenance of gaming machines.

¹² Full time equivalent

¹³ Work is seasonal, particularly in seaside towns

Lotteries

Structure of the industry

The total number of societies licensed by the Commission to carry out lotteries totalled 542 at 31 March 2009 against 562 at 31 March 2008. The term society covers such bodies as charities, sporting clubs and cultural bodies. Such organisations may employ an external lottery manager (ELM) to run all or part of their lotteries. The total number of ELMs licensed by the Commission dropped from 46 at 31 March 2008 to 38 at 31 March 2009.

Information taken from regulatory returns 1 January 2008 to 31 December 2008

ELM

Number of employees (FTE ¹⁴)	669
Number of employees (headcount)	861

Under-age gambling

There were five recorded incidents by ELMs when someone under 16 years of age gambled in a lottery before their age was ascertained.

Lottery proceeds, expenses and prizes taken from lottery returns

1 April to 31 March	Hotspot Lotteries *	Non- Hotspot Lotteries	Proceeds (ticket sales)		Expenses held		Prizes		Balance	
			£ million	% of proceeds	£ million	% of proceeds	£ million	% of proceeds	£ million	% of proceeds
2004/05	54,669	7,419	141.1	36.2	25.7	29.9	21.2	75.0	53	
2005/06	52,555	7,567	138.7	35.3	25	29.7	21	73.7	53	
2006/07	13,806	8,422	163.8	40.3	25	33.0	20	90.5	55	
2007/08		9,462	169.9	39.6	23.3	29.8	17.5	100.5	59.1	
2008/09		10,076	174.6	48.1	27.5	33.7	19.3	93.2	53.4	

* 'Hotspot' lotteries ceased to exist in 2007/08.

¹⁴ Full time equivalent

Remote

Structure of the remote gambling industry

The number of remote gambling operators licensed by the Commission rose slightly from 300 to 328 during the year, with the majority of these still relating to remote betting, consisting of betting exchanges, pool betting and general betting.

Breakdown of types of remote gambling licences issued by the Commission

General betting	72	Casino	20
Society lottery	50	Betting intermediary	19
Gambling software	49	Gaming machines technical – (full, supplier and software)	17
Pool betting	42	External lottery managers	10
General betting (telephone)	40	Bingo	9

The remote gambling industry in Great Britain is made up primarily as follows:

- many of the large and familiar high street bookmakers (see under the betting industry)
- large remote-only operators including Betfair and Bet365
- smaller betting operators that operate remote gambling facilities themselves
- smaller betting operators that have their remote operations hosted by more experienced operators
- fantasy football style remote pool betting operators
- smaller bingo and casino operators
- society lotteries that sell lottery tickets online or by telephone
- businesses supplying gambling software to gambling operators.

The majority of gambling sites accessible to British citizens are regulated overseas. In many cases an operator is licensed by the Commission for remote betting but (for fiscal and other operational reasons) its remote casino and poker operations are licensed overseas. The main European overseas jurisdictions regulating remote gambling are Alderney, Gibraltar, the Isle of Man and Malta.

Information taken from regulatory returns 1 January 2008 to 31 December 2008

Remote betting, bingo and casino

Number of employees (FTE¹⁵) **7,800¹⁶**

Self exclusion

Number of self exclusions **45,277**
 Known breaches/attempted breaches of self exclusion¹⁷ **6,807**
 Number of individuals who cancelled their self exclusion after minimum exclusion period **1,678**

The numbers of people who have self excluded and the numbers of people who have cancelled their self-exclusion may be lower than these figures as individuals may have self excluded from more than one site and thus been counted more than once. The number of breaches represents the numbers of separate incidents, rather than the number of individuals.

¹⁵ Full time equivalent

¹⁶ Some online companies have included all their employees rather than just those employed in connection with the licensed activity

¹⁷ The majority of this figure includes attempts to gamble that were successfully blocked

Under-age gambling

There were 144 recorded incidents when someone under the age of 18 attempted to gamble online. This figure includes attempts to gamble that were, in the majority of cases, successfully blocked by the operator.

Information on customer accounts	million
Customer accounts (for Commission licensed facilities)	16
Active customer accounts ¹⁸	6.2
New player registrations	4.9
Funds held in customer accounts	£257

Gross gambling yield for remote betting, bingo and casino

£896 million¹⁹

Participation in remote gambling (taken from ICM omnibus survey)

ICM Research carry out an omnibus survey that provides information on participation in remote forms of gambling. The data is published each quarter, based on an updated sample of 8,000 interviews over the previous year.

- Over the year to March 2009 (ie an average of figures for June 2008, September 2008, December 2008 and March 2009), 9.9% of the 8,000 adults surveyed said they had participated in at least one form of remote gambling (through a computer, mobile phone or interactive/digital TV) in the previous month. This compares with the 2008 calendar year figure of 9.7%, the 2007 calendar year figure of 8.8% and the 2006 calendar year figure of 7.2%. 90.0% of respondents said they had not participated in any form of remote gambling.
- Those participating in remote gambling remain more likely to be male than female, and are more likely to be aged 18-44.
- The growth in participation in remote gambling is explained largely by increased online participation in the National Lottery. If those only playing National Lottery games remotely are excluded, 5.6% of respondents had participated in remote gambling in the year to March 2009, compared with 5.6% in 2008, 5.2% in 2007 and 5.1% in 2006. Overall, in the year to March 2009, 7.5% of respondents said they had gambled remotely on tickets for the National Lottery draw in the previous month (either only or in addition to other types of gambling activity).
- Remote gambling via a computer, laptop or handheld device was most popular (8.2% of all respondents), followed by gambling via mobile phone (2.8%) and interactive/digital TV (2.1%).

¹⁸ Active accounts that have been active during the previous 12 months

¹⁹ Two larger sized betting operators relocated all or part of their operations offshore during 2008

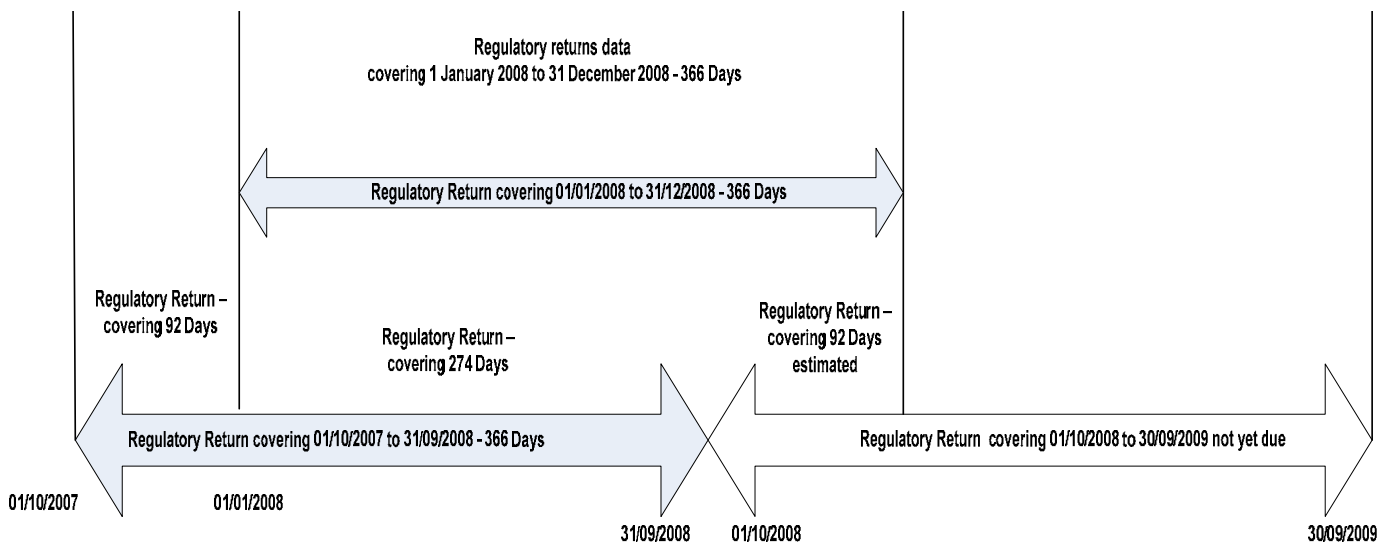
Appendix 1

Regulatory returns analysis

Regulatory returns must be completed annually by most operators and quarterly by some operators (the large betting operators, casino and remote operators). The date on which returns fall due depends on the date chosen by the particular licence holder, for example, it may coincide with an organisation’s own reporting cycle, may be on an annual calendar year basis or run from 1 September to 31 August in line with the date that the 2005 Act came into force.

- Regulatory returns must be submitted within 28 days of the date on which the return falls due.
- Lottery submissions must be made within 90 days of a draw being made or of the last scratchcard being sold.

When analysing data covering a particular period the Commission includes all returns that fall wholly or partially within that reporting period. Where the return covers only part of the period in question, the data has been adjusted to produce an estimate for the full year. For example, an operator with a reporting year running to 1 October will not yet have provided data for the full calendar year 2008: in this case the annual figures on the return to 1 October 2008 have been taken as a proxy for the full calendar year. The data provided is therefore provisional.



Appendix 2

Useful contacts

Organisation	Address	Website and email
Association of British Bookmakers (ABB)	Norris House 4 Norris Street London, SW1Y 4RJ	www.abb.uk.com mail@abb.uk.com
Betting Exchange Trade Association (BETA)	PO Box 34467 London W6 9WS	corporate@betfair.com www.betfair.com
Bingo Association	Lexham House 75 High Street North Dunstable Bedfordshire LU6 1JF	www.bingo-association.co.uk enquiries@bingo-association.co.uk
British Amusement Catering Trades Association (BACTA)	Alders House 133 Aldersgate Street London EC1A 4JA	www.bacta.org.uk info@bacta.org.uk
British Association of Leisure Parks, Piers and Attractions	Suite 12 37 Tanner Street London SE1 3LF	www.bboa.co.uk
British Beer & Pub Association	Market Towers 1 Nine Elms Lane London SW8 5NQ	www.beerandpub.com
British Casino Association	38 Grosvenor Gardens London SW1W 0EB	www.britishcasinoassociation.org.uk enquiries@britishcasinoassociation.org.uk
British Holiday & Home Parks Association Ltd	Chichester House 6 Pullman Court Great Western Road Gloucester GL1 3ND	www.bhhpa.org.uk enquiries@bhhpa.org.uk
British Horseracing Authority	151 Shaftesbury Avenue London WC2H 8AL	www.britishhorseracing.com enquiries@britishhorseracing.com
Business in Sport and Leisure (BISL)	17a Chartfield Avenue Putney London SW15 6DX	www.bisl.org info@bisl.org
Casino Machines Manufacturers Group (CMMG)	Buchanan House 3 St James's Square London SW1 Y 4JU	
Casino Operators Association (COA)	15 Livesey Street Sheffield S6 2BL	www.casinooperatorsassociation.org.uk coasec@hotmail.co.uk
Financial Services Authority (FSA)	25 The North Colonnade Canary Wharf London E14 5HS	www.fsa.gov.uk
GamCare	2nd Floor 7-11 St Johns Hill Clapham Junction London SW11 1TR	www.gamcare.org.uk info@gamcare.org.uk
Gordon House Association	Gordon House Central Office 114 Wellington Road Dudley West Midlands DY1 1UB	www.gordonhouse.org.uk help@gordonhouse.org.uk
Horserace Betting Levy Board	Parnell House 25 Wilton Road, London, SW1V 1LW	www.hblb.org.uk enquiries@hblb.org.uk

Appendix 2

Organisation	Address	Website and email
Hospice Lotteries Association	Ty Hafan Childrens Hospice St Hilary Court Cophorne Way Calderhouse Cross Cardiff CF5 6ES	www.hospicelotteries.org.uk
Independent Betting Adjudication Service	PO Box 62639 London EC3P 3AS	www.ibas-uk.com adjudication@ibas-uk.co.uk
Independent Bookmakers Association (IBA)	187-189 London Road Liverpool L3 8JG	www.independentbookmakers.com
Lotteries Council	42 Kynston Road Shrewsbury SY1 2UN	www.lotteriescouncil.org
Administration of Gambling (AGT Ltd) National Joint Pitch Council (NJPC)	3a Kings Hall St Ives Business Park St Ives PE27 4WY	mainoffice@agt-ltd.co.uk www.njpc-ltd.co.uk
National Casino Industry Forum (NCIF)	38 Grosvenor Gardens London SW1W 0EB	director@nci-forum.co.uk
Pools Promoters Association	Sportech House Enterprise Way Liverpool L13 1FB	
Racecourse Promoters Association (RCPA)	24 Lancashire Road Bishopston Bristol BS7 9DL	
Racecourse Association (RCA)	Winkfield Road Ascot Berkshire SL5 7HX	www.britishracecourses.org info@racecouseassociation.co.uk
Remote Gambling Association	6 th Floor High Holborn House 52-54 High Holborn London WC1V 6RL	www.rga.eu.com
Responsibility in Gambling Trust	c/o London Clubs International 10 Brick Street London W1J 7HQ	www.rigt.org.uk enquiries@rigt.org.uk
Responsible Gambling Fund	The Blackfriars Foundry 156 Blackfriars Road London SE1 8EN	
Responsible Gambling Strategy Board	PO Box 15065 Birmingham B2 2NG	
Scottish Independent Bookmakers Association (SIBA)	White Craigs House Glasgow G46 6SN	mail@abb.uk.com



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

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Gambling Commission August 2009

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British Gambling Prevalence Survey 2007 Executive Summary

Introduction

The British Gambling Prevalence Survey 2007 (the Survey) benchmarked participation in gambling in Britain and provided a range of data to inform our regulation of the industry. The Survey built on the 1999 British Gambling Prevalence Survey (the 1999 Survey) commissioned by GamCare.

The nature of gambling has changed substantially since 1999. The Gambling Act 2005 (the Act) provides new regulations for both old and new forms of gambling. For example, the Act recognises and accommodates the technological changes in gambling that have occurred over the last 40 years and covers the regulation of remote gambling in Britain for the first time. The Act also allows for wider advertising of gambling.

As well as allowing comparisons with results from 1999, the Survey provides baseline data before the Act came into force on 1 September 2007. According to the Survey there has been little change in the percentage of people participating in gambling and the percentage of problem gamblers since 1999. The prevalence of problem gambling is relatively low compared with that found in other countries.

However, the Gambling Commission (the Commission) remains concerned that there are still over a quarter of a million problem gamblers in Britain. There is a clear need for the industry and the Commission to work together to reduce the harm caused by gambling. This is tackled through the licensing regime introduced by the Act that requires that gambling operators comply with the Commission's Licence Conditions and Codes of Practice.

Specifically, the Survey aimed to:

- measure the prevalence of participation in all forms of commercial and private gambling
- estimate the prevalence of problem gambling
- investigate the socio-demographic factors associated with gambling and problem gambling
- assess attitudes towards gambling.

The Commission intends to carry out national gambling prevalence surveys every three years in order to collect information on how gambling behaviour changes over time. The next survey will be published in 2010.

How was the information gathered?

The Survey was carried out by the National Centre for Social Research (NatCen). Just over 9000 people, aged 16 years and over, participated in the Survey. They were selected from a random sample of addresses taken from the Postcode Address File. Participants were invited to fill in a questionnaire collecting detailed information about gambling behaviour and attitudes to gambling. The data were weighted to reflect age, gender and regional distribution of the British population according to estimates by the Office of National Statistics.

What is the level of gambling participation in Britain?

The participation rate in gambling has decreased slightly from 72% (33 million people) in 1999 to 68% in 2007 (32 million people). This decrease can be mostly accounted for by a decrease in National Lottery participation. Excluding those who had only gambled on the National Lottery Draw, gambling participation rose slightly from 46% (22 million people) in 1999 to 48% (23 million people) in 2007.

Comparing the results of the 1999 and 2007 surveys it can be seen that the most popular gambling activities have remained similar over this period. Table 1 below shows these gambling activities and the percentage of the adult population who gambled on them according to the 1999 and 2007 surveys:

Table 1: Most popular gambling activities

Activity	2007	1999
National Lottery Draw	57%	65%
Scratchcards	20%	22%
Betting on horse races	17%	13%
Fruit / Slot machines	14%	14%

Some gambling activities have become more popular since 1999, whilst others have decreased in popularity. The biggest changes in participation are highlighted in Table 2 below. The table shows the percentage of adults who gambled on the activity according to the 1999 and 2007 surveys:

Table 2: Changes in participation of gambling activities since 1999

Activities with increased popularity	Activities with decreased popularity
Lotteries other than National Lottery (8% to 12%)	National Lottery Draw (65% to 57%)
Betting on horse races (13% to 17%)	Football pools (9% to 3%)
Betting with a bookmaker (3% to 6%)	Scratchcards (22% to 20%)

New forms of gambling such as internet gambling (6%) and fixed odds betting terminals (FOBTs)¹ (3%) have emerged since 1999 and show a similar level of popularity to more established gambling activities such as playing table games in a casino (4%).

Contrary to some expectations, participation in these new activities did not cause the overall participation of gambling to increase. One possible explanation is that remote gambling is having a displacement effect from more traditional forms of gambling.

¹ Fixed odds betting terminals ('FOBTs') now come under the Gambling Act 2005 definition of a gaming machine (set out in section 235) and meet the requirements for category B2 gaming machines (eg, relating to stake and prize).

Who gambles?

The Survey revealed that gambling participation varied by a number of socio-demographic, health and lifestyle characteristics. Table 3 looks at a range of these characteristics and outlines which population groups were more and less likely to participate in gambling activities. The percentages given in the table show the participation levels for the relevant population groups only, not the whole population.

Table 3: Gambling participation by socio-demographic groups

	Groups more likely to gamble	Groups less likely to gamble
Gender	Men (71%)	Women (65%)
Age	35-44 (73%)	75+ (57%)
Ethnicity	White (70%)	Black/Black British (39%), Asian/Asian British (45%)
Income	Higher income households (73%)	Lowest income households (61%)
Education	GCSE/O-level educated (73%)	Degree educated (61%)
Marital status	Separated/ Divorced (72%), Married (70%)	Widowed (60%)
Economic activity²	Paid employment (71%)	Full time education (51%)
Social Position³	Lower supervisory & technical households (75%)	Managerial & professional and intermediate households (both 67%)
Health	Fair (72%)	Bad/very bad (62%)

There was also variation in the choice of gambling activities by different socio-demographic groups. Table 4 offers an example of this by looking at the differences in how men and women gambled. The table shows the most popular gambling activities by gender along with the percentage of men or women participating in them.

Table 4: Gambling activities by gender

2007		1999	
Men	Women	Men	Women
National Lottery Draw (59%)	National Lottery Draw (56%)	National Lottery Draw (68%)	National Lottery Draw (62%)
Horse races (22%)	Scratchcards (20%)	Scratchcards (22%)	Scratchcards (22%)
Slot machines (19%)	Horse races (13%)	Fruit / Slot machines (20%)	Bingo (10%)
Scratchcards (19%)	Other Lotteries (12%)	Horse races (18%)	Horse races (9%)
Private bets (15%)	Bingo and slot machines (both 10%)	Private bets (17%)	Other lotteries and slot machines ⁴ (both 8%)

² This was based on the activity of the household reference person – the person who responded to the introductory questionnaire.

³ As measured by the National Statistics Socio-Economic Classification (NS-SEC). This was measured for the household reference person only.

How many people are problem gamblers?

The surveys show that overall there had been little change in the prevalence of problem gambling since 1999. 'Problem gambling' is defined as gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits⁴.

The Survey employed two internationally recognised measurement screens to estimate the prevalence of problem gambling in Britain. The Diagnostic and Statistical Manual for Mental Disorders, Edition IV (DSM IV) screen was retained from the 1999 Survey and concentrates on the psychological motivations underpinning problem gambling. The second screen, the Canadian Problem Gambling Severity Index (PGSI), was introduced to reflect international best practice and focuses on the harms and consequences associated with problem gambling.

Both the DSM IV and PGSI consist of a number of screening questions relating to problem gambling behaviours. If the respondent scores above the problem gambling threshold they are defined as problem gamblers.

By using more than one method to measure problem gambling the Commission was able to check for reliability within the Survey, make comparisons with the 1999 survey and make international comparisons. The measurement screens found problem gambling prevalence of 0.6% (DSM IV) and 0.5% (PGSI); these are listed, along with the number of people they correspond to, in Table 5 below:

Table 5: Prevalence of problem gamblers in adult population

Screen	2007	1999
DSM IV screen	0.6% (284,000 people)	0.6% (275,000 people)
PGSI	0.5% (236,500 people)	n/a

Among past year gamblers, rather than the overall adult population, the problem gambling prevalence was 0.9% for the DSM IV screen and 0.8% for the PGSI screen. Excluding those who only played the National Lottery Draw increases the estimate of problem gambling amongst past year gamblers to 1.3% according to the DSM IV and 1.2% according to PGSI.

How many people are 'at risk' gamblers?

The PGSI allows for greater distinction among gamblers and provides a better understanding of the distribution of gamblers from low risk to problem gamblers. This allows the screen to identify people who may be 'at risk' of becoming a problem gambler.

The PGSI uses two categories to measure those who score on the scale but fall below the problem gambling threshold. The table below shows the PGSI categories and the percentage of respondents who fall into these categories.

Table 6: PGSI categories and the percentage of adult population in each category

PGSI classification categories	Percentage of adult population
Low risk gambler	5.1%
Moderate risk gambler	1.4%

⁴ Lesieur, HR & Rosenthal, MD (1991). *Pathological gambling: A review of the literature (prepared for the American Psychiatric Association Task Force on DSM-IV Committee on disorders of impulse control not elsewhere classified)*. Journal of Gambling Studies 7, 1, 5-40

What forms of gambling do problem gamblers play?

The Survey found that on average problem gamblers participated in over six forms of gambling. This means that it is not possible to single out particular form(s) of gambling that are especially related to problem gambling. However, the Survey showed that certain gambling activities have larger proportions of problem gamblers participating in them (as measured by the DSM IV screen):

1. Spread betting (14.7%)
2. Fixed odds betting terminals (11.2%)
3. Betting exchanges (9.8%)
4. Online gambling (7.4%)
5. Table games in a casino (5.2%)
6. Dog races (5.2%)

The Survey cannot be used to indicate causality. Problem gamblers typically participate in a range of gambling activities. It is not possible to conclude from the survey if certain activities led to problem gambling.

What factors are associated with problem gambling and ‘at risk’ gambling?

As in 1999, the Survey found a significant association between problem gambling and being male and having a parent that gambled regularly (especially if the parent had a gambling problem). Other factors associated with problem gambling included poor health, being single, being Asian/Asian British or being Black/Black British, being separated/divorced, having fewer educational qualifications and being younger than 55.

The survey found a number of variables that were associated with being a ‘moderate risk’ gambler as measured by the PGSI screen. These variables were sex (men), age (25-34), social position⁵ of household reference person (semi routine and routine occupations), parental gambling behaviour (parents regularly gambled, but did not have a problem with their gambling) and general health status (fair health).

What is the public’s attitude to gambling?

A new 14-item scale for measuring general attitudes towards gambling was developed for the Survey. Overall, and for 12 of these items, attitudes towards gambling were more negative than positive. The average view was that gambling was more harmful than beneficial for individuals, and for society, and should not be encouraged. However, the average view also supported a person’s right to gamble and rejected total prohibition. The Survey found that people who gamble had a more favourable attitude to gambling as did the under 35s, heavier drinkers and those classified as a problem gambler according to either screen. The least favourable attitudes to gambling were shown by the over 55s, the widowed, those describing themselves as Asian/Asian British or one of the other ethnic groups, non-gamblers and those with a parent or close relative with a gambling problem.

How do we know this information is accurate?

There are a number of problems that researchers undertaking surveys face, including interviewing a sample which is representative of the whole population, potential bias in the individuals participating, and untruthful responses. NatCen incorporated a number of safeguards in their methodology to minimise the risk of potential issues having an impact on the final results.

⁵ As measured by the National Statistics Socio-Economic Classification (NS-SEC). This was measured for the household reference person only.

These included checking the characteristics of respondents against the whole population, following up people who did not respond initially, and undertaking the Survey in such a way as to encourage frank disclosure. The report was peer reviewed by two leading international academics who found the study to be one with many strengths and a high quality of data.

How is the Commission building on these results?

The data collected during the Survey forms the basis for a range of secondary analysis projects that will develop understanding in key policy areas. With this in mind the Commission is working with academics and research organisations on a number of areas. These include further analysis of gambling participation, gambling on the internet, co-morbidities and social variables. The Commission will publish the results of this additional analysis either on its website or in journals.

The dataset for the Survey is available to researchers and other interested parties through the UK Data Archive (www.data-archive.ac.uk). Making the dataset available allows interested parties to undertake secondary analysis and provide further insight into gambling and problem gambling in Britain.

Where can I get further information?

This summary is intended to serve as an introduction to the Survey's findings and briefly outlines the Commission's position in relation to key points. The full report, together with the questionnaires that were used, is available on the [Commission website](#).

Gambling Commission July 2008

The Gambling Commission regulates gambling in the public interest. It does so by keeping crime out of gambling, by ensuring that gambling is conducted fairly and openly, and by protecting children and vulnerable people from being harmed or exploited by gambling. The Commission also provides independent advice to government on gambling in Britain. For further information or to register your interest in the Commission please visit our website at: www.gamblingcommission.gov.uk

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HARINGEY OVERVIEW & SCRUTINY COMMITTEE

SCRUTINY OF BETTING SHOPS IN HARINGEY

A SUBMISSION BY THE

ASSOCIATION OF BRITISH BOOKMAKERS LTD

Background

The London Borough of Haringey Overview and Scrutiny Committee has “commissioned an overview of betting offices in the Borough, in particular, the way in which they appear to be clustered in some local communities.”

The stated aim of the review is to “find out what impact this clustering effect may be having on local communities and, if there are any negative effects, to identify how these can be resolved locally”.

The Council has invited submissions from various stakeholders. This submission is made on behalf of the Association of British Bookmakers (ABB).

Introduction to the ABB

The ABB is the principal trade association for high street bookmakers in the mainland UK. It includes amongst its members, four of the five major national bookmaking chains (Coral Racing, Ladbrokes, the Tote and William Hill) as well as Paddy Power and about 150 other independent small and medium sized enterprises.

Coral Racing is part of the Gala Coral Group, which is one of the UK’s largest private companies. Ladbrokes, Paddy Power and William Hill are public companies listed on the London Stock Exchange. The Tote is in public ownership. There around 8,500 betting shops in the UK and the five major companies (including Betfred - a private operator with 850 shops) operate around 85% of all Licensed Betting Offices (LBOs).

Background History of the Betting Industry

Off course betting in Licensed Betting Offices (LBOs) was legalised in 1961 and, over time, there has been further liberalisation of the products and facilities that betting shops are allowed to provide.

LBOs were traditionally places where customers went to bet on horse and greyhound racing but, over time, they have developed into places which offer a variety of different entertainment channels, including overseas racing from places like France, Ireland and South Africa; “virtual” motor racing and football as well as horse and greyhound racing; betting on other sports, mainly football; numbers betting and machine-based games.

In 1961 the legislation governing the operation of LBOs and the process whereby licences were granted, was the Betting, Gaming and Lotteries Act 1963 (BGLA 63). Applications for new licences (or re-locations) were made to the local Magistrates Court who applied a “fit and proper” test to applicants.

Furthermore, up until the 1st September 2007 when the Gambling Act 2005 (GA05) came in to force, any operator who wanted to apply for a premises licence had to prove “unstimulated demand” for gambling in that particular area. Whilst this may have seemed superficially attractive, in reality operators frequently objected to applications made by their commercial rivals and provided evidence to the Magistrates to defeat those applications, in effect limiting competition and choice.

In its application, therefore, the process was anti-competitive, discriminated against small and medium enterprises and favoured those already licensed in a particular area.

LBOs do not sell National Lottery tickets, which are readily available in the unregulated environment of newspaper shops/convenience stores etc. LBOs are also not permitted to offer bets on the outcome of the National Lottery.

On the 1st September 2007, when the GA05 came in to force, a number of changes in the way that LBO’s were regulated occurred. Of greatest significance was the fact that, under the GA05 and unlike the BGLA63, there were 3 licensing objectives, which all operators of licensed premises were required to uphold.

Set out in s1 of the Act, these objectives are as follows:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,*
- (b) ensuring that gambling is conducted in a fair and open way, and*
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.*

Furthermore, consequent upon GA05, the betting industry saw a number of additional changes:

- Dual regulation was introduced. Organisations that wished to operate LBOs post-1st September 2007 were required to apply to the Gambling Commission, not only for operating licences but also for personal licences for their key personnel. The granting and ongoing regulation of Operating Licences and Personal Licences is retained by the Gambling Commission. In the same way that a local authority has the power to review a premises licence, so the Commission has the power to review operators' and personal licences;
- In granting an Operating Licence, the Commission needs to be satisfied, amongst other things, that the operator in question has sufficiently robust policies and procedures in place to uphold the three licensing objectives of GA05.
- The responsibility for the administration of premises licensing was transferred to local authorities from Magistrates Courts.
- The requirement for applicants for new licences to prove demand for a new or re-located LBO was removed, notwithstanding representations by the ABB to the DCMS during the consultation and scrutiny phase of the Bill that the demand test should be retained.

Thus the introduction of GA05 saw a significant increase in the levels of regulation to which the betting industry became subject. The quid pro quo for increased levels of regulation was the move to a more free market approach to betting and relaxations around advertising

Since that time LBO operators have simply engaged in normal market behavior in exactly the same way as any other retail business. They have not sought to exploit what has been categorised as a loophole in the law – no such loophole exists; rather they have been seeking to locate their LBO's where they believe the demand exists.

Key industry Features

When assessing the nature of the betting shops in the Borough, the Overview & Scrutiny Committee will wish to take account of the following general points about the betting industry as a whole.

- Betting shops are high turnover low margin businesses.
- Because of the tax structure, betting operators always pay significantly more in tax than they make in profit e.g. William Hill pays £227 million in tax and makes £142 million in after tax profit

- Betting operators pay around £400 million a year more in taxes than an equivalent sized non-gambling sector.
- Betting operators also pay around 10% of their gross profits to support British horseracing (prize money and integrity services) and make voluntary payments from their profits to support greyhound racing.
- Betting operators make voluntary payments to support research education and treatment of problem gambling. This year betting operators contributed £5 million (£6 million next year) to be distributed by the Responsible Gambling fund.
- The betting industry supports around 40,000 full-time equivalent jobs with a further 60,000 in related activities. About 14,000 of these are located within Greater London and just under 500 in Haringey, including 170 in William Hill's London headquarters.
- The level of problem gambling in the UK is low by international standards (0.6% of those who bet across multiple gambling channels) – (source BGPS 2007).
- Since B2 gaming machines were introduced into betting shops in 2002 there has been no rise in the level of problem gambling (Source BGPS 1999-2007).
- Betting operators are obliged to comply with a social responsibility code which includes operating a self-exclusion scheme.
- Gaming machines are subject to strict technical standards with high percentage returns to player. Roulette returns over 97% of stakes, retaining approximately 2.8% in profit before tax and other costs.

All LBO operators employ effective practices to prevent underage gambling such as the “Think 21” policy. The latest Gambling Commission report on this issue stated that bookmakers had made “considerable progress” in improving the level of age verification testing.

Whatever the public perceptions are of the betting industry, and more widely the gambling industry as a whole, the reality is that bookmakers operate in a highly regulated environment (more regulated than any other sector of the leisure industry) and is a well ordered part of the overall leisure and entertainment sector in the UK.

Sustainable Communities

There is no evidence that LBOs undermine sustainable communities.

The latest household expenditure survey shows that average household spend on gambling (as a percentage of total spend) varies regionally between 0.4% (London) and 1.2% (North East).

We acknowledge that, in this context, the Borough of Haringey may not be typical of London as a whole and that the trend locally may therefore be higher than 0.4%. Nevertheless even if expenditure on gambling were as high as 1.2% (for which there is no evidence), the proportion of household income is still very low.

Gambling prevalence statistics issued in in October 2010¹ show that, in the year ending 30th September 2010, 54.3% of the adult population had gambled within the last four weeks (55.2% over the same period last year). Within that figure, only 6.2% had placed an over-the-counter bet in a LBO (horses, dog and football) (6.5% last year) and 1.9% had played roulette or other B2 gaming machine content in a betting shop (2.5% last year).

By far the most prevalent gambling activity was the purchase of National Lottery tickets at 45% (45.7%) or National Lottery scratch cards at 10.1% (10.8%), neither of which are available in LBOs.

It is our view that, rather than LBOs undermining communities, they provide clean, regulated areas of leisure activity and flexible local employment. As an example there are 63 LBOs in the Borough providing between 300 – 320 jobs to part time and full time staff, together with a further 170 or so at William Hill's London Headquarters at Greenside House.

The proposition that betting shops or groups of betting shops are automatically bad for local communities is not supported by any evidence we have seen. Instead it appears to be based on a moral disapproval of betting per se and a wish to prevent people from spending their money in betting shops. It fails to take into account personal freedom and ignores the high probability that restricting the operations of legal and well-run betting shops will merely encourage illegal gambling activities.

Whilst it is true that Haringey is the eighteenth most deprived authority area in the country and the fifth in London, the ABB is not aware of any evidence that increasing the number of betting shops in an area increases levels of deprivation or, conversely, that reducing the number of betting shops would impact positively on social deprivation. If such evidence exists then the ABB would welcome the opportunity of having the chance to consider it.

Licensing

Since the 1st September 2007 the responsibility for the granting and onward regulation of gambling premises licences has rested with Local Authorities.

¹ UK Gambling Commission Participation Survey – October 2010

In considering applications for gaming premises licences, Authorities are obliged to take the following principles, as set out in s153 of GA05, into account:

Principles to be applied

- (1) *In exercising their functions under this Part a licensing authority shall aim to permit the use of gambling in so far as the authority think it –*
 - (a) *In accordance with any relevant code of practice under section 24²,*
 - (b) *In accordance with any relevant guidance issued by the Commission under section 25³,*
 - (c) *Reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b), and*
 - (d) *In accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c).*
- (2) *In determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.*
- (3) *This section is subject to section 166⁴.*

In addition to this the GA05 indicates that Licensing Authorities should not take into account moral issues surrounding gambling. This latter point is contained within Part 5 of the Commission's Guidance to Licensing Authorities at para 28; the same document contains a wide range of additional guidance covering all aspects to be taken into account by licensing authorities when considering licence applications.

We note that your Statement of Gambling Policy reflects both s153 and the Commission's Guidance to Licensing Authorities and we acknowledge the approach you have taken. We note also the caveat you have included which says that:

"Should any specific policy be decided upon as regards areas where gambling premises should not be located, this statement will be updated"

while naturally confirming that each application will be considered on its own merits.

² Conditions relating to Codes of Practice

³ Guidance to Local Authorities

⁴ GA05 s166 refers exclusively to casino licences

We are confident that any such change of policy you might adopt would be solely evidence-based and that the resultant Statement would remain fully consistent with s153 and the Guidance to Licensing Authorities.

We make this point because, as Councillors will be aware, licensing case law makes it clear that a local authority may not take into account general concerns or overarching generalisations, but must rely on specific evidence that is relevant to the application or immediate locality.

The Council may be more familiar with the licensing of premises under the Licensing Act 2003, which they have had responsibility for since 2005. However, it is important to note that one significant difference between the GA05 and the Licensing Act 2003 is the fact that nuisance is not a matter for consideration under the Gambling Act (see Guidance to Licensing Authorities Part 5, paragraph 16).

Some campaigners have characterised this situation as leaving Local Authorities without power to refuse premises licences. This is not correct. Where there is clear and cogent evidence to refuse an application in line with the statutory framework and guidance from the Commission and the authority's own policy, then an authority would be perfectly entitled to refuse an application for a new licence (or relocation of an existing licence).

The law is specifically constructed to ensure that the local decision is not politicised, but made on the basis of objective evidence.

In addition there are powers given to local authorities to begin a review of a licence where appropriate.

We are not aware that Haringey has conducted any licensing reviews of betting premises resulting in a licence being withdrawn.

Planning

Betting shops have for many years been classified under the Town and Country Planning (Use Classes) Order 1987 as A2 use (Financial and professional services - banks and building societies, professional services (other than health and medical services) including estate and employment agencies and betting offices).

Section 210 of the GA05 makes clear that the Authority shall not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with the law relating to planning or building. The intention of Parliament was not to overcomplicate the process and to keep licensing and planning considerations separate.

LBOs appear to have been held up as an example of how local authorities have been powerless to control the mix on the high street. However, it has always

been open to local authorities to issue what is known as an Article 4 Direction which restricts permitted development rights. This has, in the main, required the approval of the Secretary of State.

However, since the new Town and Country Planning (General Permitted Development) (Amendment) (England) (Order) 2010 came into effect on 6th April 2010, local authorities may now withdraw permission within a local area by way of an Article 4 Direction, without the approval of the Secretary of State. The Order makes provision for the giving of notice, representations to be taken into account and the date the direction comes into effect.

In our view, legislation already exists to control the mix on the high street and there is no compelling reason, other than from a judgmental moral standpoint, to move betting shops to a *sui generis* use class, as has been mooted by some.

Betting Shops in Haringey

Since the Gambling Act 2005 came into force in September 2007, there has been no increase in the number of betting shops in Haringey. The idea that “liberalisation” under the Gambling Act has led to an increase in betting shop numbers is not supported by the evidence.

According to Haringey’s own figures, the number of extant betting premises licences at the commencement of the financial year 2008/9 was 64. During the financial year 2008/9, 7 betting licences were surrendered and 6 were issued; resulting in a net loss of one betting shop. As the figures above demonstrate, this is something of a moving target but, as of today, we think that there are 63 LBOs trading in the Borough.

During this time, Haringey’s licensing officers conducted only one visit to a betting shop and there were no regulatory enforcement action or prosecutions against that betting shop operator or any others.

In the same period, Haringey derived total income from betting shop licence application fees and annual fees of £50,760. It spent £60,000 in costs dealing with betting premises applications which it had refused, but where appeals were brought against those refusals. Haringey also spent over £7000 on “policy work” related to betting shops, which can be contrasted with little or no resource being spent on compliance and enforcement in this area (presumably because none was thought necessary).

It appears to the ABB and its members that instead of pursuing an evidence-based approach to each betting premises application, there appears to have been a policy in relation to applications for new betting offices which resulted in unsustainable but costly appeals being pursued by the Authority.

It is understood that certain Councillors would see the rate of successful appeals against refusals to grant as undermining local democracy. However, the reality is that the legislation has operated entirely as was intended because

there have been no sustainable grounds (under a proper application of s153 of the Act as set out above) to uphold objections to applications.

In the particular case of Haringey there is clear evidence that, with betting shops closing and new licences being applied for, the market is functioning effectively and as it was intended to do

Crime in Haringey

It has been suggested that clusters of LBOs lead to additional crime and disorder. However, when examining crime and disorder in Haringey's betting shops, it is necessary to place this suggestion in the context of the general crime statistics in Haringey as a whole.

Haringey has average levels of crime when compared with other London Boroughs (although above average levels of crime compared to the national average). The exception is business robbery (993 incidents) where there is an above average level of crime.

The table below sets out the relevant Metropolitan Police crime statistics for the financial year 2008/2009 for Haringey:

Crime Category	Amount
Gun crime	158
Violence against the Person	5312 (includes 1144 incidents of harassment)
Robbery	1138
Criminal Damage	3362
Fraud or Forgery	1491
Drugs	2608
Total notifiable Offences in Haringey	27385

Crime and Disorder in Haringey's Betting Shops

Betting operators are obliged by the conditions of their operating licences to report all incidents in the betting shop where police are called. However, it should be noted that although the police may be called, they do not always attend at all or may not attend until well after the incident has taken place.

A significant majority of such calls stem from betting shop staff responding to their regulatory or civic responsibilities, including carrying out age verification procedures, reporting criminal offences and keeping good order in the betting shop.

All operators have policies in place to prevent underage gambling and a significant number of incidents relate to young adults who appear to be below the legal age for entry into an LBO and who cannot, or will not, produce ID; or to youths who are suspected of being under 18.

Generally this group gravitates towards the gaming machine area and staff can disable machines remotely to prevent gambling. All operators take their responsibilities to protect young people seriously and have made great strides in this area to ensure that young persons are prevented from entering, and remaining on LBO premises.

The figures demonstrate how this is now becoming less of a problem as young people realise that they cannot engage in gambling in betting shops.

Notwithstanding this, many of those challenged refuse to produce ID or become disruptive, abusive or violent and may refuse to leave the shop without the threat of police intervention. Many of these individuals are known to police and engage more generally in anti-social behaviour on a wider basis across the Borough.

Due to the general layout of LBOs and the security measures in place to protect staff, sometimes the only available target for those engaged in anti-social behaviour is to attack the gaming machines. The touch screen technology makes the machines vulnerable to physical damage and in certain case machines can be thrown over.

This accounts for much of the criminal damage reported in respect of gaming machines and a new criminal damage reporting protocol has now been agreed with the Metropolitan Police.

Robbery

Betting shop robbery is an issue that is taken very seriously by operators, not least because of concerns and responsibilities for the safety of their customers and staff. Each of the major operators has dedicated security staff and expends significant sums on safety and security issues. Betting operators hold regular meetings with the Metropolitan Police Flying Squad and share intelligence.

The table below sets out details of the LBO robberies in Haringey experienced by the three major operators.

Operator	2008	2009	2010
William Hill (19 shops)	13 (including 2 attempts and 3 CIT)	3 (including 1 attempt and 1 CIT)	5 (including two attempts and 2 CIT)
Coral (4 shops)	3	4 (including 1 attempt)	1 attempt
Ladbrokes (23 shops)	7	10	6
Total Incidents (46/63 shops)	23	17	12

The ABB and its members have also recently collaborated with a number of industry stakeholders (including LACORS and the HSE) and have published a set of voluntary safety and security standards for Betting Operators which is called “The Safe Bet Alliance: Voluntary Code of Safety and Security National Standards for Bookmakers”. These Standards, which have been issued to every LBO and a copy of which is attached for the information of Councillors, are designed provide practical advice and support to staff and to reduce the levels of betting shop robbery and violence in the workplace.

One of the cornerstones of reducing betting shop robbery is robust cash and security procedures. Reducing the cash available in shops also reduces the incentive to commit this serious offence.

Increased levels of CCTV installation in London have also helped provide evidence for police with clear-up rates rising. The ABB and many of its members support Crimestoppers, both financially and by using the service proactively to identify betting shop robbers.

Betting shop are generally safe places for customers and are small communities in themselves. They also reflect the communities in which they are located and the individuals who commit offences or engage in disorder in betting shops often also engage in the same type of behaviour throughout their communities.

Given that betting shops are open for long hours, seven days a week and 364 days a year, the level of crime and disorder in LBOs is generally low relative to the area in which they are located.

There is no evidence that the presence of betting shops in an area increases crime and disorder. On the contrary, there is strong evidence that properly run and regulated betting shops reduce levels of crime and disorder (see below).

Illegal Gambling

Much of the discussion around the issues raised by this Inquiry has centred on the Green Lanes area of Haringey and the question has been raised by leading local and national politicians as to why there are eight betting shops in this immediate location (we are aware of a ninth by Manor House Station about half a mile away).

As Councillors will know, Green Lanes is home to a number of social clubs as well as a wide variety of shops, grills and cafes. Green Lanes also has a troubled history, with Haringey’s own Enforcement Team recently engaged in activity to tackle protection rackets, illegal gambling and money laundering centred on social clubs and other premises.

In July 2009, despite the ready availability of properly regulated gaming machines in local LBOs, a joint operation by the Gambling Commission and the Metropolitan Police Clubs and Vice team seized 13 illegal gaming machines in the Green Lanes area.

Illegal gambling and particularly illegal machines are there to defraud customers and to avoid both regulatory supervision and taxation.

In a market which provides employment to nearly 500 people in the Borough, the betting industry contributes to the Borough's finances through its business rates and licence fees and provides clean and properly regulated places of legal entertainment in area which offers no other leisure facilities apart from two pool halls, it appears to the ABB that the presence of legal and regulated gambling mitigates against the demand for illegal gambling in the area. If the legal betting opportunities were reduced or removed, the illegal alternative would be likely to become more widespread than it is already.

Premises operated by major national chains and medium sized independents are not targets for or susceptible to racketeering. It seems self-evident that, whilst it may be more challenging, the Borough's limited resources would be more usefully directed at addressing the problems caused by illegal gambling activities than being spent on opposing licensing applications from legitimate operators, already assessed as suitable to run betting businesses by virtue of having been granted operating licences by the Gambling Commission.

Targeting Deprived Communities

It has been suggested by some both in the broadcast and print media that bookmakers deliberately target people in deprived communities. Such claims have been made unsupported by any evidence.

The ABB and its members categorically deny any such suggestion and wish to make it clear that bookmakers do not "target" such people. Decisions over the location of betting premises are taken having assessed the market in any given location, taking, for example, such factors as population density, competition and the cost and availability of retail space into account.

Conclusions

Haringey has already spent considerable resources on policy issues surrounding betting shops and has incurred high costs in pursuing what have turned out to be failed appeals to licensing applications. Yet there is no firm evidence on which to base a case for a more restrictive planning and licensing policy in this area.

The lack of compliance activity by the authority implies that, in reality, betting shops are somewhat down the risk scale. The betting industry is subject to some negative perceptions, often held by people who do not gamble and do not use betting shops but feel morally justified in exercising judgments about the motives and means of those who do.

It is evident that, in Haringey, this issue has become highly politicised, and that this has regrettably resulted in an institutionalised opposition to betting shops

and a refusal to accept the liberalisation of the regulated market which the law intended.

There is no proliferation of betting shops in Haringey and no exploitation of either loopholes in the law or of the population. There is some market liberalisation which has led to clustering (as with other groups of retail outlets), but, in the case of LBOs, that was an entirely foreseeable consequence of the way the legislation has been framed by Parliament.

Most of Haringey's betting shops have been in the Borough for many years, but the removal of a demand test has allowed some new operators, mainly from the Independent SME sector, to enter the market. That has increased competition and choice.

There are opportunities for legitimate, properly evidenced representation during the application process and we have indicated how existing planning legislation in the form of Article 4 Orders could be used by authorities to deal with mix on the high street.

The Planning and Licensing processes should remain separate and the ability of operators to relocate marginally profitable shops to an alternative location within the Borough should not be overly restricted. That is surely better than complete closure with the concomitant loss of jobs and the creation of incentives for illegal betting.

While public perception is important, it must be tested against the evidence; and, while it is right that the betting industry should be challenged, it is equally right that those with negative views on the betting industry are also challenged to back up their allegations with hard evidence.

We hope that the evidence we have submitted will help to inform that process.

Association of British Bookmakers Ltd

1st November 2010

Attachment:

Safe Bet Alliance – Voluntary Code of Safety & Security – National Standards for Bookmakers

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Voluntary Code of Safety and Security National Standards for Bookmakers

Compiled in association with



31st March 2010

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Purpose of This Document

This document outlines agreed voluntary standards of workplace safety and security for the betting industry in England, Scotland and Wales with a view to reducing the risk of robbery and other forms of violence in the workplace.

Please Note

The Association of British Bookmakers (“ABB”) in offering this advice wishes to make it clear that:

- operators are not exempted from their own statutory responsibilities;
- legislation may change over time and the advice given is based on the information available at the time the guidance was produced. It is not necessarily comprehensive and is subject to revision on the light of further information;
- this advice is not intended to be a definitive guide to, nor substitute for, the relevant law. Independent legal advice should be sought where appropriate; and
- the purpose of this document is to provide advice to bookmakers and should not be used in anyway such as to impose legal responsibilities on bookmakers over and above their statutory responsibilities.

Acknowledgements

This document has been developed by the Association of British Bookmakers in conjunction with an external industry stakeholder group which includes representatives from: the police, local authorities, Department for Work and Pensions (“DWP”), Community Union, the Institute of Conflict Management and the Scottish Centre for Healthy Working Lives.

There is universal commitment on behalf of all the operators consulted to develop best practice as far as the safety and security of Licensed Betting Office (“LBO”) staff is concerned.

Other Industries

Whilst this document has been developed primarily for the bookmaking industry with a view to managing the risk of violence within LBOs, it may also be of interest to stakeholders in other industries.

Foreword

For health and safety regulators such as local councils and HSE, it is always encouraging when an industry takes the lead in tackling its own issues and challenges. Invariably, the industry itself is best placed to identify these challenges and to come up with workable, common sense solutions. And these solutions work all the better where they involve management and employees working together and drawing on the employees' in-depth knowledge of their own workplace.

The Safe Bet Alliance scores highly on all these counts. It has its roots in the bookmaking industry and is well qualified to assess the safety and security challenges facing the industry and its workforce. It is also an "alliance" in the truest possible sense, bringing together safety and security specialists from across the bookmaking industry, the Community union, Police, local councils, and the third sector.

The strength of the Safe Bet Alliance is reflected in the quality of its guidance. The new national standards contained in this Code offer betting shop operators excellent guidance and advice on keeping your staff and premises safe and secure. The Code is particularly strong in linking the national standards to risk assessment. Risk assessment is of course a legal requirement – every employer is required to assess the risks arising from their work activity – whereas the national standards themselves are voluntary. Nonetheless, all of the standards deal with measures aimed at reducing the risk of robbery, and other forms of violence in the workplace, and the findings of your risk assessment will help you identify the type of measures appropriate for your own betting shop.

The Code, and the national standards, will also provide the bookmaking industry, and regulators, with a common reference point. That is an important development in itself. As betting shop operators, you are entitled to expect that, when any of our officials visit your premises, they understand the nature of your industry and the health, safety and security challenges which you face. Equally, you are entitled to expect regulators to abide by their Enforcement Policy Statements and that their interventions are proportionate, accountable,

consistent, transparent and targeted. The publication of this Code, and national standards, will help us deliver these objectives.

This Code is a landmark publication, it deserves the widest possible audience and we commend it to you all.



Derek Allen
Executive Director
Local Authorities Coordinators of
Regulatory Services



Geoffrey Podger
Chief Executive
Health and Safety Executive

Introduction

As a general rule, Licensed Betting Offices (“LBOs) in England, Scotland and Wales provide an enjoyable leisure activity for customers and a safe and secure working environment for staff. However in common with other retail businesses, it makes sense for LBO operators to actively manage the risk of crime including robbery and other forms of violence.

The Safe Bet Alliance is a collaborative initiative whose members include the Association of British Bookmakers (ABB), representatives of metropolitan and regional police services, local authorities, DWP, Community Union, the Institute of Conflict Management and the Scottish Centre for Healthy Working Lives. The Alliance aims to reduce the risk of robbery, other forms of violence (e.g. assault or abuse of staff) and anti-social behaviour in LBOs in England, Wales and Scotland. Working in close partnership with other members of the Alliance, the ABB has developed and endorses this document as a practical guide for LBO operators.

Assault, abuse and anti-social behaviour

Assault, abuse and other anti-social behaviour should never be seen merely as an “occupational hazard”. This document explains how appropriate policy and procedures – reinforced through staff training – can both reduce the incidence and mitigate the effects of these forms of violence.

Robbery

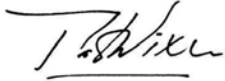
Risk of robbery or attempted robbery varies significantly by location. London LBOs experience more than half the total number of UK robberies. Some security measures may be costly to install and / or operate. Therefore in any given LBO it makes sense to implement security measures consistent with the level of risk faced by that individual shop. That level of risk can be determined by carrying out a systematic risk assessment, which is also covered in this document.

Continuous improvement

The UK betting industry continues to make significant investment in the safety and security of its staff and premises. The UK’s 5 biggest bookmakers (all of whom have dedicated security management and staff) control approximately 85% of UK LBOs.

There are already high levels of cooperation and sharing of good practice between operators. The ABB runs a reward scheme for members of the public who provide information about LBO robbery, and subscribes to Crimestoppers.

Nevertheless, the industry endeavours to continuously improve our effectiveness in this area. With that in mind I encourage all operators to carefully review and – where appropriate – implement the voluntary standards described in this document.

A handwritten signature in black ink, appearing to read 'P. Nixon', with a horizontal line underneath.

Patrick Nixon
Chief Executive
ABB

Definition: Work-Related Violence

Work related violence is described by the Health and Safety Executive (HSE) as:

“Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work”.

Examples of violence in the workplace are set out below:

- verbal abuse, in person, over the telephone or by email;
- unreasonable and/or offensive remarks or behaviour;
- written abuse;
- rude gestures;
- intimidation;
- harassment, including sexual and racial abuse;
- threatening behaviour e.g. squaring- up without physical contact;
- ganging up, bullying and intimidation;
- physical or sexual assault;
- spitting;
- malicious damage to the property of staff, customers or the business.

The effects if violence in the workplace will vary from individual to individual, however all examples of violence should be treated seriously.

Understanding the Standards

All the voluntary standards contained in this document deal with measures aimed at reducing the risk of robbery and other forms of violence in the workplace. However the document is split into five Sections (A to E) for ease of use by operators.

Section A

Section A sets out voluntary standards aimed at reducing violence in general. These standards recommended the adoption of operator-wide policies and procedures.

Section B

Section B describes the five steps to reducing risk, explains the importance of the shop-specific risk assessment and offers guidance on carrying out the risk assessment.

Section C

Section C states the key principles of crime prevention.

Section D

Section D sets out the voluntary national standards that define specific security and safety measures designed primarily to reduce the risk of robbery, albeit with the additional benefit of helping to reduce the risk of other forms of violence. Operators are encouraged to apply appropriate security and safety measures for each shop based on the findings of a shop-specific risk assessment.

Section E

Section E covers the voluntary national standards on training which are critical to the successful implementation of the standards.

Section A: National Standards - Violence in the Workplace

1 Policy Adoption

1.1 LBOs are generally safe places for staff and customers, but some LBO staff, like other staff in the retail sector, experience incidents of violence in the workplace. LBO operators will take all reasonable steps to prevent and respond to incidents of violence, up to and including reporting incidents to the police for possible prosecution.

1.2 The risk to staff from violence in the workplace needs to be included in the wider risk assessment process. Protecting the welfare of LBO staff going about their business is just as important as managing the risk of LBO robbery.

1.3 Many of the security measures put in place to protect against robbery also reduce the risk of physical injury to LBO staff. However those measures do not rule out the possibility of staff facing abuse or aggression which can have negative consequences both for the individual and for the business.

1.4 Facing assault, abuse or aggression or having to work in an intimidating environment is not “part of the job” and all reasonable measures should be taken to reduce the risks of these incidents.

2 Consequences of Violence in the Workplace

2.1 Work-related violence has serious consequences for employees, the businesses they work for and the wider community.

2.2 *Consequences for employees*

2.2.1 Victims may suffer both physical injury and psychological harm including anxiety and stress. The cumulative effect of sustained verbal or physical abuse can wear someone down, both mentally and physically. Even if other members of staff seem to be coping, some individuals may experience feelings of isolation, fear, anxiety, suffering, humiliation, loss of confidence, reduced self-esteem and de-motivation.

2.2.2 Stress arising from violence in the workplace can damage physical health, social relationships and the way people function at work and at home. Stress can manifest itself in a range of symptoms including the following:

- i. physical signs like headaches, insomnia, indigestion, high blood pressure, alopecia, loss of appetite;

- ii. emotional factors such as irritability, lack of concentration, anxiety, loss of confidence, low morale;
- iii. behaviour aspects such as poor work performance, accidents, poor relationships at home and work;
- iv. abuse possibly leading to dependence on tobacco, drugs and alcohol;
- v. immediate, and often long-term disruption to interpersonal relationships;
- vi. if the situation persists, physical illness, psychological disorders.

It is important to remember that these symptoms may have nothing to do with stress but they are often danger signs which should not be ignored.

Stress may - if unrelieved – ultimately contribute to other physical and psychological disorders including clinical depression.

2.3 *Consequences for business*

2.3.1 For employers violence in the workplace can represent a real financial cost through:

- i. low staff morale contributing to high staff turnover. This in turn may affect a business' profitability and even its viability;
- ii. low staff morale contributing to poor staff performance, reducing revenues and increasing costs;
- iii. increased commercial insurance premiums;
- iv. sick pay for staff who are absent as a direct or indirect result of violence in the workplace;
- v. compensation claims, including not only the value of the claim itself and any legal fees but also the management time required to deal with it;
- vi. damage the company's image which may make recruitment more difficult and/or costly.

2.4 *Consequences for the wider community*

2.4.1 The costs of dealing with the impact of violence in the workplace include:

- i. costs of health care and long-term rehabilitation for victims;
- ii. costs of unemployment and retraining for victims who lose or leave their jobs;
- iii. breakdown of trust in society.

3 Developing a Policy on Violence in the Workplace

3.1 All LBO operators are expected either to develop a separate policy on violence in the workplace issues or to incorporate the elements of such a policy into existing health and safety policies. This document provides references to source material that should help to enable all operators to develop their own policy on violence in the workplace.

3.2 A policy document should include the following:

- i. a definition of violence in the workplace;
- ii. a commitment to monitoring and reducing the number and severity of incidences of violence which emphasises how seriously this issue is taken by the organisation;
- iii. identification of who within the organisation is involved in the implementation of the policy, a description of their role and responsibilities as relevant to the policy, and noting any links that they may have with relevant third parties;
- iv. general advice on staff behaviour/ prevention advice;
- v. explanation of the risk assessment procedure;
- vi. list of any agreed control measures that can be applied;
- vii. summary of all training available;
- viii. explanation of the reporting procedure and a copy of the relevant form;
- ix. a summary description of the support available to victims.

3.3 Procedures should be reviewed annually or after a serious incident, whichever is the earlier. The policy should be discussed on a regular basis in staff forums.

3.4 Risk assessments should also consider the risk to ancillary staff on the premises (e.g. cleaners, maintenance staff) and visitors and the possible need to make special arrangements to manage any risk of violence towards them.

4 Training

4.1 As part of an employee's induction training, there should be awareness training regarding issues of violence in the workplace. After initial training, staff should:

- i. be aware of the issue of violence in the workplace;
- ii. understand any relevant policies and procedures issued by their employer in order to manage the risk of violence.

4.2 There should be both ongoing and refresher training that should allow staff to:

- i. know how to prevent and reduce violence in the workplace;
- ii. be able to deal appropriately with difficult, aggressive or violent customers.

4.3 The ABB has developed a basic training package on dealing with violence in the workplace. It is necessary for operators to carry out a training needs analysis and either to develop further in house training programmes or identify third party providers who can provide relevant training in conflict management.

4.4 It is reasonable that staff should receive training within their induction programme and on a continuing basis. See Section E.

5 Incident Reporting

5.1 Beyond meeting the business' statutory responsibilities, there are a number of further advantages in encouraging comprehensive reporting of incidents. These include:

- i. it indicates to staff that the issue is taken seriously and that violence in the workplace is not regarded as "part of the job";
- ii. it allows the business to monitor trends, to react to emerging findings and to inform the ongoing risk assessment process;
- iii. it provides a platform for a cultural change if one is needed.

6 The Reporting Threshold

6.1 There is sometimes debate about when an incident should be reported. For example one person may find an incident disturbing or upsetting whereas another may not be affected. To ensure that incidents are readily reported, management should not impose their own threshold, but staff should be encouraged to report incidents which fall within the definition of violence in the workplace provided above. Even if others think the incident is "low-level" but that particular member of staff perceives it to be abuse or aggression then it should be reported.

7 A Clear and Effective Reporting Policy

7.1 LBO staff should clearly understand how to report incidents and to whom. The depth of the report and the response to it should be proportionate to the seriousness of the incident being reported. The reporting process should be standardised with a standard report form and a clear route for the report. It should be clear whose responsibility it is to review and investigate. Reported incidents should be categorised so that internal statistics can be readily maintained and trends monitored.

7.2 It is suggested that the incident report should contain the following information:

- i. form of assault (e.g. weapon, physical, biting, hitting);

- ii. form of abuse or threatening behaviour (e.g. swearing, sexual harassment, racial harassment, damage to the fabric of the building);
- iii. surrounding circumstances of the incident (identifying “flash points”, details of witnesses etc);
- iv. timing of the incident;
- v. outside agencies involved/medical attention needed;
- vi. area of incident (e.g. counter, gaming machines, customer area).

7.3 Staff should be confident that a reported incident will be properly considered and where necessary investigated. Feedback on the outcome of any investigation should be made to the person who made the report (even if only to explain why enquiries into an incident could not be progressed any further). Communication is fundamental to the process and is a key agent in cultural change.

7.4 In large organisations with central reporting processes, someone whom the member of staff involved recognises as being within their own immediate line management chain should be given responsibility for liaising with the person who made the report over the incident, including providing feedback and support.

8 Support for Victims

8.1 After an incident a member of staff (or group of staff) may require support. The nature of that support will be governed by the seriousness of the incident. The key points to remember are:

- i. victims of aggression will be affected in different ways and with differing levels of severity;
- ii. sensitive and appropriate support is needed to reduce the suffering of the victim;
- iii. there may be a requirement for further training.

8.2 In the case of more serious incidents, LBO staff should be fully aware of what to do in the immediate aftermath of that incident. This will include immediate medical and welfare support for the victim, having a clear communications strategy (notifying the police, operations room, security staff and relevant managers), preserving evidence at the premises and securing the premises.

8.3 Staff should be given an opportunity to talk openly about the incident, express their feelings and should receive constructive support. People are more likely to cope with an incident, be less afraid, and have increased job satisfaction and commitment, if they get

positive support from colleagues and managers. But bear in mind that some people will not wish to talk about the incident, or may wish to do so at a later date.

8.4 Whilst the welfare of the victim is paramount, consideration should be given to the effect on other staff of any reported violence. This includes staff who may not have been involved in the incident or even present at the time that it occurred.

8.5 If it is available, staff could be offered confidential counselling services. These may be offered either in-house or from local professionals such as Victim Support or GP services. Managers should ensure that staff know that counselling is available and encouraged. Where in-house services are offered, employers should ensure staff are fully trained and competent.

8.6 Any time off which may be necessary for recovery should be granted, and sympathetic and supportive contact with victims maintained in accordance with the operator's HR policy. After the victim returns to work, managers will need to continue to lend support and monitor for ongoing effects of the incident.

9 External Agencies

The LBO Manager should liaise with their local police Safer Neighbourhood Team on an ongoing basis. The Safer Neighbourhood Team may be contacted via the local police authority.

10 Conclusions

10.1 Following the advice in this document and meeting the relevant standards will not prevent all incidents happening, but it will reduce risk and enable LBO staff to deal more effectively with incidents.

10.2 Those responsible for developing and delivering policies and procedures in this area can find more information on the HSE website. This includes a "toolkit" at: <http://www.hse.gov.uk/violence/toolkit/index.htm>.

10.3 An example policy that can be used by smaller LBO operators can be found as Appendix 1.

Section B: National Standards - Risk Assessment

1 The importance of risk assessment

1.1 The standards aimed at robbery reduction are LBO-specific and therefore underpinned by risk assessment. For operators with five or more staff, risk assessments must be in writing, but in any event operators must be able to demonstrate that they have carried out the process. It is a requirement of Regulation 3 of the Management of Health and Safety at Work Regulations 1999 for the significant findings of a risk assessment to be recorded in a retrievable format where the employer has five or more employees. The employee number relates to the entire business not just in one shop, so if the business has five shops all employing one person there is requirement to record the risk assessment findings.

1.2 A standardised process can be used to assess the risk of robbery The ABB believes that it is right to use a risk assessment methodology that will already be familiar to many LBO operators and their staff. The Health and Safety Executive's "five steps to risk assessment" reflects good risk assessment practice. Some operators already have a formalised approach to risk assessment. For example, they use between two (general or enhanced) and five categories of risk.

1.3 Participation in the Safe Bet Alliance does not necessarily entail redesigning existing formal process, but making sure that the operator takes a structured approach to risk assessment.

1.4 The key is following the five steps to risk assessment and determining what preventive or crime reduction measures are appropriate to manage the risks. For ease of reference the steps are:

- i. identifying the hazards;
- ii. deciding on who might be harmed and how;
- iii. evaluating the risks and deciding on precautions;
- iv. recording the findings and implementing them; and
- v. review.

1.5 Not all LBOs present the same risk. Some LBOs have never been robbed. An LBO may be located in an area where there is little or no business or street robbery. However, the process of carrying out risk assessments must be dynamic to meet emerging circumstances. All risks must be considered.

1.6 The appropriate starting point is proportionate and evidence based standards for all LBOs, with a menu of enhanced measures being used when risk assessment shows that a particular premises presents a greater risk. Where there is a higher level of risk then further measures need to be taken.

1.7 There are a range of professional and factual judgments to be applied when deciding what are the appropriate control measures to be applied in a particular LBO; for example, an analysis of trends and the strengths and weaknesses of particular crime prevention measures. This document assists with that analysis.

1.8 As part of the risk assessment process which should be premises specific, local management and LBO staff must be consulted. An assessment should take account of the age and experience of the staff working in the premises. Younger or less experienced staff may lack the interpersonal skills to effectively manage the risk of violence without the support of colleagues.

1.9 There are two distinct statutory schemes covering staff consultation on health and safety issues: one where unions are recognised by the employer and the other where they are not. As a minimum, it is important to make sure that consultation mechanisms are established which ensure that either all employees or elected representatives of employee safety are consulted. Further details can be found on the HSE website <http://www.hse.gov.uk/pubns/indg232.pdf>

1.10 In coming to a view about the level of risk, the most simple and objective method for existing shops is to take into account the most relevant and current crime and other statistics and also consider the history of a particular premises in terms of the number and type of incidents to which it has been subjected. For example, if the statistics show that the risk of business robbery and other crime is low and there has been no history of robbery in that shop (say in the past two years) then that shop may be lower risk for robbery. For new shops one should consider the crime statistics and the experience of other similar shops in the immediate area.

1.11 Likewise the identification of a pattern of offences occurring in a particular area may require re-evaluation of the risk in particular shops even if the particular shop in question has

not been subject to a serious offence. The number of robberies in a particular area or region endures will be a determining factor when carrying out a risk assessment.

1.12 Following risk assessment, it will be necessary to justify the measures taken to reduce the risk of robbery. The key question is: "Were the measures taken to reduce the identified risk reasonable and proportionate in the circumstances?"

1.13 Whilst the large and medium sized operators have their own professional security staff, other sources of information are local police crime prevention and police Safer Neighbourhood Teams, local Environmental Health Officers and local business crime reduction partnerships. Some of the larger metropolitan forces publish their own business crime statistics at area level.

1.14 Carrying out the risk assessment and taking appropriate action is the responsibility of the operator. Where there are gaps in an operator's knowledge or expertise, then consultation with those external resources identified above is very much part of the process.

1.15 Nobody wants to see a rise in the level of robbery or other incidents in their area and betting operators should give every assistance to local crime prevention and investigating officers, particularly during a spate of local robberies when risk assessments may need to be revised to meet the changing circumstances. Whilst it is hoped that this will never be the case, this does not mean agreeing to requests for the implementation of disproportionate security measures across whole estates as a reaction to a spate of localised incidents.

1.16 A partnership approach should be adopted, but ultimately it is for the operator, having consulted where necessary with those responsible for health and safety compliance and the prevention and detection of crime, to implement the appropriate measures to reduce risk. Adopting the standards set out below will assist operators to meet their legal obligations. The ABB can help independent members determine their current level of risk from LBO robbery and advise on the suggested measures set out in the tables below. The five steps involve identifying the risk (in this case the real risk of robbery and violence in the workplace), identifying what has been done already to reduce risk, establishing what else needs to be done, and finally who is responsible for delivering the agreed measures and reviewing the process.

1.17 A practical example of this approach in action can be seen on the HSE website. www.hse.gov.uk/risk/casestudies/pdf/bettingshop.pdf

1.18 Crime prevention techniques and methodology obviously come in to play here. Designing an LBO to reduce the risk of robbery (by limiting the opportunity or inclination of a potential offender to commit the crime) or implementing measures to deal with a particular situation and look at making individual betting premises a harder target for attack, is all part of the process.

1.19 However, many medium sized and small betting operators do not have the resources to employ specialist security staff (it is another function of management) nor do they have funds to pay for expensive reviews by security consultants. Therefore following an approach which is already in use by many operators to manage their health and safety risk and spreading simple and effective practice across the whole industry seems sensible. Experience has also shown that Crime Prevention, Licensing Authority and Environmental Health Officers also encourage this approach.

1.20 Whilst all reasonable measures should be taken to reduce robbery and other risks, it is also important to provide support for staff after an incident has occurred consistent with that contained in the Violence in the Workplace Policy.

Section C: National Standards – Crime Prevention

Whilst it is staff that should be encouraged to adopt the following principles, managers must implement and constantly reinforce them.

1 Crime prevention

1.1 **Being vigilant** - This means maintaining awareness of what is happening in the shop, identifying unusual occurrences or suspicious individuals and not being afraid to report suspicions to the police.

1.2 **Giving good customer service** - Great customer service reduces the risk of robbery. Building relationships with your existing customers, challenging strangers with a “Can I help you?” and running a clean and efficient shop discourages would be offenders.

1.3 **Minimise cash** - minimising the amount of cash that an offender can get their hands on is the single most important factor in reducing the incidence of robbery, preventing repeat robberies or stopping a spate of robberies by the same individual or group. This means making sure large amounts of cash are not available at the till and, where available, time delay safes or other dispersal alternatives are used.

1.4 **Utilise existing security measures properly** - This means following established security procedures, ensuring security equipment e.g. CCTV is working at all times and that security devices where fitted, such as Maglocks are working at all times

1.5 **Avoid establishing a routine** – staff should avoid banking or emptying machines at the same time and establishing predictable patterns for would be offenders to observe.

1.6 **Stay calm and remain passive, but in control** – whilst staff should do as the offender asks and never do anything to challenge the offender, there may be things that staff can do which help the situation. For example, breaking eye contact or appearing to comply with instructions while looking at opportunities to preserve evidence. Staff should do no more than they are asked to e.g. staff should not volunteer concealed cash or security processes. This could put colleagues in danger.

1.7 **If robbed, the shop must be secured immediately after the incident** - The shop is a crime scene where police may be able to recover forensic evidence, including DNA. Staff should preserve the scene by not touching or moving anything and prevent access by members of the public (although this does not mean ushering out those customers who were present during the incident).

1.8 *All these principles should be underpinned by staff training.*

2 The Ten Principles of Crime Prevention

- 2.1 Target hardening.
- 2.2 Target removal.
- 2.3 Remove the means to commit crime.
- 2.4 Reduce the payoff.
- 2.5 Access control.
- 2.6 Visibility/surveillance.
- 2.7 Natural surveillance.
- 2.8 Environmental design.
- 2.9 Rule setting.
- 2.10 Increase the chance of being caught.

Section D: National Standards – Security & Safety Measures

1.0 The following voluntary security standards are based on surveys of premises that have been subject to robbery offences, the 10 principles of crime prevention (see Section C), and good practice that is currently adopted within the bookmaking industry.

1.1 An “off the shelf” accreditation scheme for robbery prevention may not necessarily be appropriate for a LBO.

1.2 In tandem with providing proper training (see Section D) sometimes it will be necessary to impose these working practices if it is felt that staff will be better protected by their use.

1.3 The following voluntary security standards are colour-coded as follows:

1.3.1 GREEN represents a standard that UK bookmakers have agreed to work towards as a national voluntary standard.

1.3.2 BLUE represents a guide to best practice that it may be appropriate to implement depending on the findings of a shop-specific risk assessment.

LBO Shop Front

Location	Advice	Standard
Front door	<p>The front door is the first opportunity for controlling entry to the LBO premises. It is important that the door and the doorframe are of sound construction. All locking mechanisms should be regularly maintained and meet relevant BSI standards.</p>	<p>The front door and surround must be of sound construction and locks should meet relevant BSI standards.</p> <p>Where the risk of repeat robbery offences is assessed as significant at the site, an electromagnetic lock maglock or an alternative entry control system should be installed, except in exceptional circumstances.</p>
Corporate Signage	<p>It is important that customers and staff are aware of the security used on the premises. It is a legal requirement to clearly advertise the use of CCTV and the reasons for its use.</p>	<p>LBOs must have a clear corporate security notice that details security measures.</p> <p>Where CCTV is operated, the signage must incorporate a CCTV notice.</p> <p>Corporate signage and / or VDU screens should indicate to customers that operators may refer offences committed against staff to the police.</p>
Advertising / door/windows	<p>It is important that staff have an opportunity to identify potential risks before they enter the premises. It is also important that members of the public can see into the premises.</p> <p>In some premises the structure and internal layout of the premises prevents clear viewing. In such cases alternative security measures e.g. external CCTV should be considered.</p>	<p>Where reasonably practicable, advertising should be restricted to allow for clear viewing into and out of the premises.</p>
Lighting	<p>External lighting is important to support external CCTV (where installed) and clear vision to aid the use of maglocks etc. Where possible external lighting also assists to identify potential risk during hours of darkness.</p>	<p>Care must be taken to ensure that lighting does not create mirror effects thus reducing visibility for staff.</p>

LBO Shop Floor

Location	Advice	Standard
Furniture	<p>Consideration needs to be given to the type of furniture used within the LBO. Dependent on the risk, furniture may need to be secured to the floor or of such construction that it cannot be used as a weapon or tool for causing damage.</p>	<p>Appropriate furniture must be used in the LBO.</p> <p>Where there is an identified problem consideration should be given to securing furniture or removing portable items e.g. stools.</p>
Customer Desks and writing benches	<p>Desks and benches placed near windows and doors in some LBOs can become attractive to undesirable "customers" e.g. drug dealers. These people cause a number of problems: Scaring off regular customers, Causing local disorder problems.</p>	<p>When particular problems have been identified consideration should be given to the removal of desks and writing benches from front window positions where the structure of the premises permits.</p> <p>Liaison with local police to discuss appropriate action.</p>
Fire exits	<p>Fire exits are another potential entry / escape route for offenders. In some cases fire exits cannot be seen from the cash office. The introduction of alarms on all fire exits will ensure that staff will be aware when fire doors are opened. CCTV will allow the capture of images of persons using the door.</p> <p>Fire doors must not be used as an alternative entrance / exit from the LBO unless it is an agreed exit.</p>	<p>All fire doors must have signage that the doors are only to be used in an emergency only.</p> <p>All fire doors must be fitted with appropriate locking systems.</p> <p>Fire exits not viewable from the counter must be fitted with an audible alarm.</p> <p>Strengthened fire doors should be fitted as part of all new builds and refits</p>
Toilets	<p>In LBOs where toilets are available to members of the public, staff need to be aware of the potential misuse of the facilities. Robbers have been known to wait in toilets until premises are closed.</p> <p>Where misuse becomes an issue consideration should be given to controlling entry to the toilets or withdrawing the facility.</p>	<p>All toilets must be regularly checked by staff for evidence of misuse and for anyone loitering there at closing</p> <p>Where there is evidence of misuse the management needs to control access to the customer toilets.</p> <p>Consideration should be given to temporarily withdrawing facilities if the control systems prove inadequate and misuse is evident. This may involve seeking advice from local police.</p>
Gaming Machines	<p>Certain issues can be linked to the operation of Gaming machines: Stolen money being laundered, Underage persons using the machines and</p>	<p>A procedure must be in place that ensures that gaming machines are only opened when staff are sure that it is safe to do so in</p>

	<p>Criminal Damage to the machines and robbery when being emptied.</p>	<p>compliance with company policy.</p> <p>Remote control on/off switch for the machines should be in the Cash Office, allowing isolation of the machines.</p> <p>CCTV to cover gaming machine areas and capture images.</p> <p>Company policies must make clear that machines must not be opened if it is not safe to do so.</p>
<p>Signage</p>	<p>It is important that internal signage should reinforce the message of the corporate signage at the points of entry.</p>	<p>Security messages must be prominently displayed in the cash office by means of corporate signage and / or VDUs.</p>
<p>Internal CCTV</p>	<p>CCTV must be in good working order and fit for purpose for which it was installed.</p> <p>CCTV is essential for post robbery investigations. For this reason it is vital that at least one camera is capable of obtaining a head and shoulders image of all persons leaving the premises. A minimum of a second camera is required to see what has happened in the store.</p> <p>All CCTV images to be recorded using frame rates appropriate to the operational requirements.</p> <p>Images must be retained for a minimum period of not less than 14 days.</p> <p>A regular maintenance plan for the CCTV system must be in place All CCTV must comply with the Data Protection Act and should take account of the Home Office / ACPO National CCTV Strategy http://www.crimereduction.homeoffice.gov.uk/cctv/index.htm</p>	<p>CCTV must provide clear images of the counter, entrances and exits. The camera angle, where possible, should capture the general floor area (including gaming machines)</p> <p>Consideration should be given to installation of a covert camera to capture facial images.</p> <p>Processes must be in place to allow police access to images as soon as possible following an incident.</p>
<p>Lighting</p>	<p>Lighting plays an important part in creating an environment that feels safe and secure. Lighting is also essential for the capture of CCTV images.</p>	<p>Internal and external lighting should support high quality CCTV images and recordings.</p>

LBO Cash Office and Counter

Location	Advice	Standard
Cash Office Door	<p>The door to the cash office is in many cases the last barrier between the public area and the safe and tills. It is important that this door and the surround are of suitable construction to withstand an attack.</p> <p>Where the door to the cash office is a fire door there may be restrictions on the type of door and security used.</p>	<p>Where fitted, doors and door surround must be of sound construction and where possible open outwards. For existing premises where doors open inwards, bolts are acceptable.</p> <p>All cash office doors should be of suitable construction and be secure.</p> <p>Where staff cannot see the exterior a spy hole or clear glass panel must be in place in the cash office door.</p>
Security Screens	<p>Security screens serve two main purposes: prevention of assault of staff and a barrier to stop access to the cash office.</p> <p>Where criminal incidents or risk assessments result in premises being assessed as higher risk, screens should be installed.</p> <p>It is important that the security screen is correctly fitted and of the appropriate type.</p> <p>Re- assessment of the screen situation should take place following a significant incident.</p>	<p>Shops graded as high risk should have a security screen.</p> <p>Security screens should be of an appropriate height and construction to prevent offenders climbing over the screen.</p> <p>The gap between the counter and the bottom of the screen should be sufficiently restricted to make access by customers difficult</p> <p>Where a premise is identified as high risk, consideration should be given to having a full screen.</p>
Hold Up Alarms	<p>A Hold-Up Alarm may be operated to summon urgent Police assistance when an assailant enters a previously defined area with the obvious intention of harming or threatening any person within that defined area. Source: (ACPO 2008)</p> <p>Alarms may be fixed position or discreet personal holdup alarms carried by staff.</p> <p>Where hold up alarms are installed or made available, staff must be trained and confident in the use and operation of the alarm.</p> <p>Alarms must be appropriately placed and regularly maintained.</p> <p>Fitted alarms must go to a central</p>	<p>Staff must have access to a shop telephone capable of direct dialling 999.</p> <p>Following an attack the police should be contacted using 999.</p>

	<p>station monitoring centre and must always be silent alarms.</p>	
<p>Cash minimisation</p>	<p>Reducing the amount of reward available to offenders is a key crime reduction principle.</p> <p>A realistic maximum limit for cash in tills must be identified for each store.</p> <p>All cash in excess of this limit must be placed in the safe, not hidden in the shop!</p>	<p>A maximum till limit must be identified for each LBO.</p> <p>The maximum limit must be enforced.</p> <p>It is unlikely that the maximum till limit will need to exceed £300 per till.</p>
<p>Safes and time delay</p>	<p>It may be advisable in certain shops with a high cash turnover to fit a second hidden safe (floor) or a time delay mechanism or insert. Introducing a time delay mechanism or hidden safe reduces the chance of offenders obtaining large quantities of cash from the main safe.</p>	<p>It is highly recommended that all betting offices be fitted with a safe in an appropriate location.</p> <p>Where safes are used they must be closed and locked at all times when not in use.</p> <p>If fitted, inserts must remain locked unless in use.</p> <p>Excess cash should be placed in the safe.</p>
<p>Banking Procedures</p>	<p>Banking should take place as and when required. The following points should be noted. No fixed day or time should be arranged for banking.</p> <p>Staff uniform including badges must not be visible when banking.</p>	<p>Banking must be a random activity not restricted to certain days or times.</p> <p>Staff and management must be trained in relation to banking procedures.</p>
<p>Opening and Closing</p>	<p>Opening</p> <p>Staff should remain vigilant when unlocking the premises, looking for anyone waiting in the vicinity of the premises. If the member of staff is suspicious of any person they should not unlock the shop but move to a place of safety where they can call police.</p> <p>If it is safe to do so once the door is opened staff should enter quickly locking the door behind them until they are ready to open the premises to the public.</p> <p>Closing Time</p> <p>Good preparation and teamwork is key. A check must be made of all</p>	<p>Staff engaged to open premises should be fully trained and briefed and be given the confidence to delay or cancel opening if they are at all suspicious.</p> <p>Opening and closing procedures must be introduced and complied with.</p>

areas, toilets etc to ensure that no one is concealed within the building. Lock the door with the key don't rely solely on the maglock (where fitted). Now is the only time that the shop's total cash should be fully checked and counted. Lock all cash away in the safe equipment provided.

It is advisable that if there are 2 staff members they leave together and maintain vigilance.

If staff are suspicious of any person they should not leave the building, but wait until the person leaves or call police. Do not leave via back doors onto unlit areas and car parks etc.

LBO Procedures

Location	Advice	Standard
CCTV	CCTV is essential for the identification and conviction of offenders.	<p>Consideration should be given by all operators to installing CCTV when new premises are opened or refitting is undertaken. A rolling programme of increasing CCTV coverage is desirable.</p> <p>All London betting offices should be fitted with internal CCTV (see above)</p>
Training	<p>Training is an essential element for security. Staff need to know what to do before, during and after a robbery. All staff from cleaners to managers and contractors play an essential role in reducing robbery. Appropriate training reduces the risk of injury, reduces the financial loss and improves the possibility of identifying and convicting offenders.</p>	<p>All staff and operational managers and others should receive comprehensive security training to ensure that they are aware of their duties and responsibilities.</p> <p>Training for all staff must be provided in relation to robbery awareness.</p> <p>Refresher training needs to be undertaken at regular intervals</p>
Police Liaison	<p>Liaison with local police officers is always advisable, irrespective of where you trade from and the associated risks.</p> <p>The method of policing has recently changed. With the introduction of Safer Neighbourhood Teams “SNTs” (and their local equivalents in Scotland who can be contacted via the local police station) there is a need for businesses to engage with the police at this local level. The SNT is a valuable resource for addressing local disorder problems, passing information and reassurance of staff and should be encouraged to visit the premises on a regular basis</p>	<p>Establish who is the local SNT and develop that relationship for advice, visits and support and know the contact number for local SNT.</p>
Local Business Watch Initiatives	<p>Local Business Watches do have advantages in reducing crime. The timely sharing of information, the ability to identify local issues before they become problems and the opportunity to communicate with police, local authority and other organisations make the time invested a worthwhile expenditure.</p>	<p>Operators (especially those without dedicated security departments) should consider affiliation to their local Business Crime Reduction Partnerships or similar initiatives.</p>
Recruitment and retention	<p>It is essential staff are trustworthy and comply with security</p>	<p>A robust recruitment and reference checking process should be in place</p>

of staff	<p>procedures. Staff have access to cash on site and to security procedures and operations.</p> <p>All staff need to be vetted to the appropriate level.</p>	<p>for all potential employees.</p>
Management of Staff	<p>It is important to adopt a pro-active management style that has a positive impact on staff ensuring that they follow procedures at all times. Managers who fail to ensure that security policies are complied with are failing to manage.</p> <p>Disciplinary action should be considered for any breaches of procedure by managers or staff, taking into account all mitigating factors.</p>	<p>Managers must ensure that all staff have access to policies and procedures at all times and that they understand and follow those procedures.</p> <p>Where it is evident that security procedures have not been followed it is advisable that staff involved receive appropriate action in line with company policy.</p>
Property Management	<p>Investment in security equipment can be compromised if it is not correctly installed and maintained. Unfortunately many investigations are frustrated because faulty CCTV has not been reported or remedied and robberies have occurred because of faulty installations e.g. incorrectly fitting maglocks.</p> <p>The shop manager, where possible, should ensure that all security equipment is working correctly and maintained to acceptable standards. Daily and periodic checks should be completed.</p> <p>A detailed log of all work required, date of reporting and date of rectification needs to be maintained by the manager. This log should include, where appropriate, to whom the matter was reported, date and time and outcome of the reported incident.</p>	<p>Security equipment must be correctly installed and maintained.</p> <p>A scheduled check of security equipment must be undertaken and a maintenance log maintained.</p> <p>Internal or external service level agreements should be in place with engineers.</p>
Incident Report Log	<p>Many offenders reconnoitre the premises prior to a robbery to identify what security is in place and how staff are likely to react. It is vital that details of suspicious persons and vehicles are recorded, as these events may be key to any investigation.</p> <p>Where schemes are in place it is important that relevant information is passed to the interested parties.</p>	<p>All LBOs should record suspicious incidents in the shops incident log.</p> <p>Each entry must record the date, time and location of the suspicious activity.</p> <p>Details of suspicious persons must include a description including:</p> <ul style="list-style-type: none"> • gender • age

		<ul style="list-style-type: none"> • height • race • marks, scars, tattoos, jewellery • clothing • items carried • accent • vehicle make • vehicle colour • registration mark
<p>Excellent Customer Service</p>	<p>Staff should be encouraged to welcome customers at the time they enter the shop. This customer focus may deter offenders who are conducting a pre-raid reconnaissance.</p>	<p>All staff should be encouraged to acknowledge customers as they enter the shop and maintain a customer focussed approach.</p>
<p>Lone Working</p>	<p>Whilst lone working is sometimes unavoidable and is not necessarily a factor which increases susceptibility to robbery or other violence in the work place, it does in some respects increase the vulnerability of workers.</p> <p>Operators should only allow lone working once a risk assessment has been carried out and where there is evidence to show that lone working at a particular time of the day is safe.</p> <p>Some staff feel more vulnerable when they are working alone and research has shown that lone workers who are subject to incidents take longer to recover and may experience more acute feeling of distress.</p> <p>A significant proportion of robberies occur after 1830 in the evening and in shops where the risk of robbery is heightened this factor needs to be taken into account.</p>	<p>All operators should have a lone working policy which addresses staff safety.</p> <p>Where an operator allows lone working managers should maintain regular contacts with lone workers.</p> <p>Based on the risk assessment the operator should define the minimum number of staff and their experience levels necessary to run the shop securely.</p> <p>Where following risk assessment, lone working is considered appropriate and robbery is a heightened risk then operators should consider additional measures such as remote monitoring systems, controlled entry and hold up alarms.</p>
<p>Safe Havens</p>	<p>Rather than engage with offenders or potential assailants at the counter, where it is safe to do so, it is often effective for staff to retreat to a "safe haven". This means that the employee avoids contact and retreats to a place of safety within the secure staff area.</p>	<p>Where there is a policy of "safe haven" use, staff must be fully trained in procedures.</p> <p>"Safe havens" may be dual purpose (e.g. back office or toilet), but they must also be fit for purpose with means of outside communication (telephone land line or other communications system) and secure from attack.</p>

		<p>“Safe haven” doors should open outwards and be fitted with a spy-hole for looking out from inside the safe haven</p>
<p>Reporting, Action and Feedback</p>	<p>In addition to those matters which must be reported for HSE and Gambling Commission purposes, staff should be encouraged to report all incidents where they have suffered abuse that is personal in nature (as opposed to derogatory comments about the business or its policies). Incidents of sexual or racial abuse should always be reported as should shouting or swearing where the employee feels intimidated by that action.</p>	<p>Operators should have clear reporting processes and procedures which are communicated to staff. Staff clear about who in the business will deal with their report.</p> <p>Reports should always be actioned and the member of staff given feedback about the outcome of their report.</p>
<p>Data</p>	<p>Data is essential in enabling operators to carry out risk assessments and to monitor trends within their own business (as well as assisting in the monitoring and analysis of industry trends).</p>	<p>The operator shall maintain the following records:</p> <ul style="list-style-type: none"> i. all customer incidents where police are called, including robbery (required for Gambling Commission purposes); and ii. incidents which result in an employee being absent (through injury) for more than three days (required for HSE purposes). <p>Additionally the operator will provide a formal mechanism for staff to report incidents defined as “violence in the workplace”.</p>

Section E: National Standards – Training

1 The Importance of Training

1.1 Efficient and effective training of staff is crucial to the effectiveness of the implementation of the standards. Without such training staff may be reluctant to deploy certain security measures when an incident takes place, perhaps fearing that offenders may be incited to greater levels of violence. The following aims to provide a useful reference for operators to consider when putting together training programmes, rather than to stipulate mandatory subject matter or the manner in which training is delivered.

1.2 Health and safety law requires sufficient training is provided to all employees to ensure, so far as is reasonably practicable, their health and safety. Training and information must be provided to ensure that the health and safety risks to employees are managed. The risk of violence should be managed in the same way as any other workplace risk and staff need to understand their employer's health and safety policies, expected working practices and procedures for reducing violence and dealing with it. A range of training should be available to staff and managers that is appropriate to their duties and responsibilities.

1.3 All staff and operational managers should receive training that covers comprehensively security practices and procedures, robbery awareness and dealing with issues of violence in the workplace.

1.4 The ABB can provide training packages to operators which deal with reducing robbery risk (including safe banking practices) and dealing with violence in the workplace. As part of the training process, staff should be allowed to discuss their experiences and share their concerns. Where training is provided online, this might be via discussion with their line manager.

1.5 The training should be based on the standards set down in the National Occupational Standards for Prevention and Management of Work-Related Violence. The National Occupation Standards for the Prevention and Management of Work Related Violence are designed to support the development of good practice and awareness in the workplace, and the needs of employers and employees. They have been developed and reviewed in consultation with employers, sector specialists, stakeholders and awarding bodies. They are widely imported into other suites of national occupational standards and mapped to awards and development programmes.

1.6 The list of units included in the Occupational Standards is included in Appendix 4.

1.7 The training must also specifically cover robbery awareness. The training will need to be on-going, covering induction training, further training and refresher training (as set out in Section A, paragraph 4).

2. Conclusion

2.1 Good safety and security starts with people; cleaners to managers all have a vital role in ensuring the safety and security of your premises. Good policies and procedures that all staff understand and comply with are an essential starting point. Implementation of operator wide policies and security measures appropriate to the level of risk faced by the individual LBO will only be effective if staff utilise them properly. These standards are intended to be a starting point for a safer and more secure LBO environment.

2.2 There is a need for operators to continually review and adapt their policies to meet emerging threats and risks to staff, customers and business. The ability of staff to identify and report suspicious activity is vital, as is liaising with the local police and other businesses to identify local problems or trends. Following the standards contained within this document offer no guarantee that incidents will not occur; however these standards are designed to reduce the risk.

2.3 If the ABB can be of any assistance with the implementation of any security initiative please do not hesitate to call on **020 7434 2111**.

Appendices

Appendix 1 Violence in the Workplace (“ViW”) Example Policy for Small Bookmakers

1 Background

1.1 [OPERATOR NAME] betting shops are generally safe places for staff and customers, but some betting shop staff, like other staff in the retail sector, experience incidents of violence in the workplace. [OPERATOR NAME] will take all reasonable steps to prevent and respond to incidents of violence, up to and including reporting incidents to the police for possible prosecution.

1.2 Following the advice in this document and meeting the relevant standards will not prevent all incidents happening, but it will reduce risk and enable betting shop staff to deal more effectively with incidents.

1.3 The risk to staff from violence in the workplace needs to be included in the wider risk assessment process. Protecting the welfare of betting shop staff going about their business is just as important as managing the risk of betting shop robbery.

1.4 Many of the security measures put in place to protect against robbery also reduce the risk of physical injury to betting shop staff. However those measures do not rule out the possibility of staff facing abuse or aggression which can have negative consequences both for the individual and for the business (see below).

1.5 Facing assault, abuse or aggression or having to work in an intimidating environment is not “part of the job” and all reasonable measures will be taken to reduce the risks of these.

2 Consequences of Violence in the Workplace (ViW)

2.1 Work-related violence has serious consequences for employees [OPERATOR NAME] and the wider community.

2.2 Consequences for employees

2.2.1 Victims may suffer both physical injury and psychological harm including anxiety and stress. The cumulative effect of sustained verbal or physical abuse can wear someone down, both mentally and physically. Even if other members of staff seem to be coping, some

individuals may experience feeling of isolation, fear, anxiety, suffering humiliation, loss of confidence, reduced self-esteem and de-motivation.

2.2.2 Stress arising from violence in the workplace can damage physical health, social relationships and the way people function at work and at home. Stress can manifest itself in a range of symptoms including the following:

- i. physical signs like headaches, insomnia, indigestion, high blood pressure, alopecia, loss of appetite;
- ii. emotional factors such as irritability, lack of concentration, anxiety;
- iii. loss of confidence, low morale;
- iv. behaviour aspects such as poor work performance, accidents, poor relationships at home and work ;
- v. abuse possibly leading to dependence on tobacco, drugs and alcohol;
- vi. immediate, and often long-term disruption to interpersonal relationships;
- vii. if the situation persists, physical illness, psychological disorders.

2.2.3 It is important to remember that these symptoms may have nothing to do with stress but they are often danger signs which should not be ignored.

2.2.4 Stress may – if unrelieved – ultimately contribute to other physical and psychological disorders including clinical depression.

2.3 *Consequences for business*

2.3.1 For [*OPERATOR NAME*] violence in the workplace can represent a real financial cost through:

- i. low staff morale contributing to high staff turnover. This in turn may affect profitability and even viability;
- ii. low staff morale contributing to poor staff performance, reducing revenues and increasing costs;
- iii. increased commercial insurance premiums;
- iv. sick pay for staff who are absent as a direct or indirect result of violence in the workplace;
- v. compensation claims, including not only the value of the claim itself and any legal fees but also the management time required to deal with it;
- vi. damage the company's image which may make recruitment more difficult and/or costly.

2.4 *Consequences for the wider community*

The costs of dealing with the impact of violence in the workplace include:

- i. costs of health care and long-term rehabilitation for victims;
- ii. costs of unemployment and retraining for victims who lose or leave their jobs;
- iii. breakdown of trust in society.

3 Definition of Violence in the Workplace

3.1 Work related violence is described by the Health and Safety Executive (HSE) as:
“Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work”

3.2 Examples of violence in the workplace are set out below:

- verbal abuse, in person, over the telephone or by email;
- unreasonable and/or offensive remarks or behaviour;
- written abuse;
- rude gestures;
- intimidation;
- harassment, including sexual and racial abuse;
- threatening behaviour e.g. squaring-up without physical contact;
- ganging up, bullying and intimidation;
- physical or sexual assault;
- spitting;
- malicious damage to the property of staff, customers or the business.

3.3 The effects of violence in the workplace will vary from individual to individual, however all examples of violence should be treated seriously.

4 Commitment to monitoring and reducing the number and severity of incidents

[*OPERATOR NAME*] is committed to monitoring and reducing the number and severity of incidents of violence in the workplace.

5 Key people

The following table identifies who at [*OPERATOR NAME*] is involved in the implementation of this policy, describes their role and responsibilities as relevant to this policy, and notes any links that they may have with relevant third parties:

Staff involved with ViW Policy implementation	Description of role & responsibilities relevant to the ViW policy	Relevant links to third parties (e.g. local Safer Neighbourhood Team)
[INSERT SPECIFIC DETAILS]		

6 Staff behaviour and prevention of violence

6.1 *Be vigilant* – maintain awareness of what is happening in the shop, identify unusual occurrences or suspicious individuals and do not be afraid to report suspicions to the police.

6.2 *Give good customer advice* – great customer service reduces the risk of robbery. Building relationships with your existing customers and challenging strangers with a “Can I help you?” Running a clean and efficient shop. All these help to discourage potential offenders.

6.3 *Minimise cash* – minimising the amount of cash that an offender can get their hands on is the single most important factor in reducing the incidence of robbery, preventing repeat robberies or stopping a spate of robberies by the same individual or group. Make sure large amounts of cash are not available at the till and, where available, time delay safes or other dispersal alternative are used.

6.4 *Utilise existing security measures properly* – follow established security procedures, ensuring security equipment (e.g. CCTV) is working at all times and that security devices where fitted (e.g. maglocks) are working at all times.

6.5 *Avoid establishing a routine* – staff should avoid banking or emptying machines at the same time and establishing predictable patterns for would be offenders to observe.

6.6 *Stay calm and remain passive, but in control* - whilst staff should do as the offender asks and never do anything to challenge him or her, there may be things that staff can do which help the situation. For example, breaking eye contact or appearing to comply with instructions while looking at opportunities to preserve evidence. Staff should do no more than they are asked to e.g. staff should not volunteer concealed cash or security processes. This could put colleagues in danger.

6.7 If robbed, the shop must be secured immediately after the incident. The shop is a crime scene where police may be able to recover forensic evidence, including DNA. Staff should preserve the scene by not touching or moving and prevent access by members of the public (although this does not mean ushering out those customers who were present during the incident).

6.8 All these principles will be underpinned by staff training.

7 Risk Assessment procedure

[INSERT OPERATOR'S RISK ASSESSMENT PROCEDURE]

8 Control measures to be applied

[INSERT SPECIFIC CONTROL MEASURES TO BE APPLIED]. The Safebet Alliance Voluntary Code of Safety and Security National Standards for Bookmakers Section D offers a guide)

9 Summary of available training

(INSERT SPECIFIC TRAINING AVAILABLE TO STAFF). This may include online training available via the web-site of the Association of British Bookmakers www.abb.uk.com)

10 Reporting procedures and documentation

10.1 Betting shop staff should clearly understand how to report incidents and to whom. The depth of the report and the response to it should be proportionate to the seriousness of the incident being reported.

10.2 The reporting process is standardised with a standard report form, a clear route for the report and clear allocation or responsibility for following up.

10.3 It is suggested that the report should contain the following information:

- i. form of assault (e.g. weapon, physical, biting, hitting);
- ii. form of abuse or threatening behaviour (e.g. swearing, sexual harassment, racial harassment, damage to the fabric of the building);
- iii. surrounding circumstances of the incident (identifying "flash points", details of witnesses etc);
- iv. timing of the incident;
- v. outside agencies involved/medical attention needed;
- vi. area of incident (e.g. counter, gaming machines, customer area).

[ATTACH A COPY OF THE REPORT FORM]. The Safebet Alliance Voluntary Code of Safety and Security National Standards for Bookmakers Section D offers a guide

10.4 It should be clear whose responsibility it is to review and investigate.

The following table provides an example list of reporting and follow-up roles and responsibilities. This is intended to be edited into one that is consistent with the operator's actual resources and organisation:

Security	Day 1	<ul style="list-style-type: none"> • on receipt of notification of a serious incident in a shop ensure that District Operations Manager, Area Operations Manager, Operations Controller and the HR Department are informed.
	Day 2	<ul style="list-style-type: none"> • attend scene, if possible. • address security concerns • attend scene (if not done on day 1) • consider any longer term security concerns • complete incident report discuss with Line Management
District Operations Manager	Day 1	<ul style="list-style-type: none"> • attend the scene • look after the welfare of staff • ensure the completion of relevant shop paperwork/cash reconciliation where necessary • secure shop • arrange staffing for next day • if District Operations Manager cannot attend, speak to staff on telephone and arrange for Area Operations Manager to attend • make regular contact with staff in weeks following incident
	Day 2	<ul style="list-style-type: none"> • keep HR team updated

HR	Day 2	<ul style="list-style-type: none"> • contact the employees involved and advise what assistance may be available
	Day 4	<ul style="list-style-type: none"> • consider RIDDOR requirements and file a report if applicable • follow up with EHO as appropriate
	5-28 days	<ul style="list-style-type: none"> • arrange external counselling if necessary • visit employees who are absent due to effects of incident • maintain Company records

10.5 Reported incidents should be categorised so that internal statistics can be readily maintained and trends monitored. The Safebet Alliance Voluntary Code of Safety and Security National Standards for Bookmakers Appendix 5 provides a template for data collection.

11 Follow up

11.1 Feedback on the outcome of any investigation should be made to the member of staff involved (even if only to explain why enquiries into an incident could not be progressed any further).

11.2 Procedures should be reviewed annually or after a serious incident, whichever is the earlier. The policy should be discussed on a regular basis in staff forums.

11.3 Risk assessments should also consider the risk to ancillary staff on the premises (e.g. cleaners, maintenance staff) and visitors and the possible need to make special arrangements to manage any risk of violence towards them.

12 Training

12.1 Employee induction training will include awareness training regarding issues of violence in the workplace. After initial training, staff should:

- i. be aware of the issue of violence in the workplace;
- ii. understand any relevant policies and procedures issued by their employer in order to manage the risk of violence.

12.2 There will be both ongoing and refresher training that should allow staff to:

- i. know how to prevent and reduce violence in the workplace;
- ii. be able to deal appropriately with difficult, aggressive or violent customers.

12.3 The ABB has developed a basic training package on dealing with violence in the workplace. [OPERATOR NAME] will carry out a training needs analysis and either to develop further in house training programmes or identify third party providers who can provide relevant training in conflict management.

13 The reporting threshold

13.1 Staff are encouraged to report incidents which fall within the definition of violence in the workplace provided above. Even if others think the incident is “low-level” but that particular member of staff perceives it to be abuse or aggression then it should be reported.

14 Support for victims

14.1 After an incident a member of staff (or group of staff) may require support. The nature of that support will be governed by the seriousness of the incident. The key points to remember are:

- i. victims of aggression will be affected in different ways and with differing levels of severity;
- ii. sensitive and appropriate support is needed to reduce the suffering of the victim;
- iii. there may be a requirement for further training.

14.2 In the case of more serious incidents, betting shop staff should be fully aware of what to do in the immediate aftermath of that incident. This will include immediate medical and welfare support for the victim, having a clear communications strategy (notifying the police, operations room, security staff and relevant managers) and preserving evidence at the premises (securing the premises).

14.3 Staff should be given an opportunity to talk openly about the incident, express their feelings and should receive constructive support. People are more likely to cope with an incident, be less afraid, and have increased job satisfaction and commitment if they get positive support from their colleagues and managers. But bear in mind that some people will not wish to talk about the incident, or may wish to do so at a later date.

14.4 Whilst the welfare of the victim is paramount, consideration should be given to the effect on other staff of any reported violence. This includes staff who may not have been involved in the incident or even present at the time that it occurred.

14.5 If it is available, staff could be offered confidential counselling services. These may be offered either in-house or from local professionals such as Victim Support or GP services. Managers should ensure that staff know that counselling is available and encouraged. Where in-house services are offered, employers should ensure staff are fully trained and competent.

14.6 Any time off which may be necessary for recovery should be granted, and sympathetic and supportive contact with the victims maintained. After the victim returns to work, managers will need to continue to offer support and monitor for ongoing effects of the incident.

15 External Agencies

[*OPERATOR NAME*] will liaise with relevant local police Safer Neighbourhood Teams (and/or their equivalents in Scotland) and with EHOs on an ongoing basis.

16 Keeping the policy up-to-date

16.1 more information is available at the HSE website. This includes a “toolkit” at:

<http://www.hse.gov.uk/violence/toolkit/index.htm>.

16.2 [*OPERATOR NAME*] will review this policy annually, and after any especially serious incident.

Appendix 2 Health and Safety Risk Assessment Form - Blank

TEMPLATE RISK ASSESSMENT FORM

Company Name:

Date of risk assessment:

Review Date:

What are the hazards?	Who might be harmed and how?	What are you already doing	What further action is necessary?	Action by whom?	Action by when?	Done

Appendix 3 Health and Safety Risk Assessment Form – Completed Example

Important Note

The following is an example of a shop-specific risk assessment. Risk assessments will vary between different shops, and “further actions” may depend on the actual level of risk identified. For example, in this example shop “furniture is fastened to the floor so that it cannot be used as a weapon or tool”. That will not be necessary in every shop.

EXAMPLE RISK ASSESSMENT OF ROBBERY / VIOLENCE RISKS IN A BETTING SHOP

Company Name: Smith's Betting Office

Date of risk assessment: 01/04/2010

Review Date: 01/04/2011 (or post incident)

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom?	Action by when?	Done
<p>Robbery (physical and non-physical violence associated with such incidents)</p>	<p>Staff may suffer ill health such as stress and/or physical injury from threats or physical violence during the event of a robbery</p>	<p>Shop Front</p> <ul style="list-style-type: none"> ▪ Front door is locked and maintained ▪ Security notices are displayed clearly ▪ Lighting is adequate so that staff can identify risks during hours of darkness <p>Shop Floor/ Office</p> <ul style="list-style-type: none"> ▪ Furniture is fastened to the floor so that it cannot be used as a weapon or tool ▪ Fire doors are secure ▪ Fire exits are not used as exit (e.g. cigarette break and staff trained on this) ▪ Toilets are regularly checked for misuse ▪ CCTV is installed ▪ Security messages are displayed in the cash office (e.g. staff cannot access the safe) ▪ The door to the cash office is secure and of sound construction and has a spy hole ▪ All staff have immediate access to a telephone capable of dialling 999 ▪ A safe is provided with time delayed access ▪ All excess cash is placed in the safe ▪ Trips to the bank are random with no fixed time and staff are trained in this procedure 	<p>Shop Front</p> <ul style="list-style-type: none"> ▪ Install an electromagnetic lock (maglock) to control access at high risk times ▪ Allow clear viewing into and out of the premises where possible <p>Shop Floor/ Office</p> <ul style="list-style-type: none"> ▪ Control entry to the toilets ▪ Remind staff not to misuse fire exits ▪ Instruct and train staff to lock the front door when gaming machines are being emptied ▪ Adjust CCTV to cover counter, entrance and exit to capture facial images ▪ Consider provision of a full security screen to restrict access and protect staff (consult with staff) ▪ Consider installing fixed or personal hold up alarms and train staff in their proper use (consult with staff) ▪ Introduce a £300 till limit ▪ Provide refresher training for staff in banking procedure 	<p>Manager</p> <p>Manager</p> <p>Manager Manager</p> <p>Manager/ staff</p> <p>Manager/ contractor Manager</p> <p>Manager</p> <p>Manager Manager</p>		

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom?	Action by when?	Done
<p>Robbery (physical and non-physical violence associated with such incidents) <i>continued</i></p>		<p>Opening /Closing</p> <ul style="list-style-type: none"> ▪ All areas checked (inc toilets) prior to closing ▪ Door securely locked with key prior to cashing up/ closing procedure starts ▪ All cash is locked away in the safe ▪ Where possible 2 staff leave together ▪ Staff trained to check vicinity before opening / closing ▪ Staff informed to report anything suspicious to the Police* <p>Procedures</p> <ul style="list-style-type: none"> ▪ Training is provided to all staff in what to do before, during and after a robbery ▪ Refresher training is provided periodically ▪ All staff are vetted appropriately ▪ All security equipment is logged and checked regularly ▪ All suspicious incidents are logged by staff and if necessary passed to the Police ▪ All staff are trained to acknowledge staff and maintain a customer focused approach to deter potential offenders ▪ Additional safeguards are in place to protect staff when it is necessary for them to work alone (regular contact/ remote monitoring) ▪ A lone working policy is in place with additional control measures to protect staff working alone ▪ Gaming machine procedure in place for emptying (e.g. only when safe to do so) ▪ Post incident support is available to staff as detailed in the Safebet Alliance document 	<p>Opening /Closing</p> <ul style="list-style-type: none"> ▪ Re-train staff in the opening/ closing procedure ▪ Instruct staff never to leave via back door onto unlit area <p>Procedures</p> <ul style="list-style-type: none"> ▪ Extend training to cleaning staff ▪ Establish contact details for the Police and ensure all staff are aware. Encourage them to visit and provide advice and information ▪ Review lone working arrangements (consider additional measures to make staff feel less vulnerable) ▪ Utilise the back room as a place of safety for staff to retreat by providing a telephone line, door lock, spy hole and train staff in correct use ▪ Introduce a mechanism for staff to report all violent incidents 	<p>Manager</p> <p>Manager</p> <p>Manager & staff</p> <p>Manager</p> <p>Manager & staff</p> <p>Manager</p>		

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by whom?	Action by when?	Done
<p>Assault, abuse and anti-social behaviour (verbal abuse, offensive behaviour, written abuse, rude gestures, intimidation, harassment, racial & sexual abuse, physical assault, malicious damage to property of staff customers or the business)</p>	<p>Staff may suffer ill health such as stress or physical injury from assaults, threats or abuse, etc from members of the public</p>	<ul style="list-style-type: none"> ▪ Staff are aware informed that such incidents are not tolerated and are trained in reducing such occurrences ▪ All staff are encouraged to acknowledge customers as they enter the shop ▪ Staff are encouraged to report incidents which they find offensive or threatening and feedback is provided about the outcome of their report 	<ul style="list-style-type: none"> ▪ Display signage to inform customers that offences committed against staff may be referred to the Police ▪ The number and type of incidents will be monitored, introduce procedure ▪ Further training to be provided so that staff know what to report, who to report to and what action will be taken 	<p>Manager</p> <p>Manager</p> <p>Manager</p>		

* Local Police Safer Neighbourhood Teams

Appendix 4 National Occupational Standards for Prevention of Work Related Violence (“WRV”)

Detailed below is the catalogue of learning units. For further information contact the HSE hotline 0845 345 0055 or visit <http://www.hse.gov.uk/violence/information.htm>

UNIT CATALOGUE

Unit Number	Unit Title
WRV 1	Make sure your actions contribute to a positive and safe working environment
WRV 2	Protect yourself from the risk of violence at work
WRV 3	Identify, assess and review the risk of violence to workers
WRV 4	Develop effective policies and procedures for minimising the risk of violence to workers and review their effectiveness
WRV 5	Implement policy and procedures to reduce the risk of violence at work
WRV 6	Promote a safe and positive culture in the workplace
WRV 7	Resolve and evaluate work-related violent incidents
WRV 8	Support individuals involved in violent incidents at work
WRV 9	Investigate and evaluate incidents of violence and work
WRV 10	Make sure communication is effective following an incident of violence at work
WRV 11	Develop and maintain an effective management information system for incidents of violence at work
WRV 12	Managing aggressive communication within an organisation
WRV 13	Make sure your own actions minimise the risks of aggressive communication
WRV 14	Managing lone working

Appendix 5 Model Data Collection**Monthly Summary of Reported Incidents (Month)**

Incident type	Number of reported incidents
Assault – customer on staff	
Assault – customer on customer	
Robbery – attempted	
Robbery – actual	
Criminal damage – retail	
Criminal damage – gaming machines	
Aggressive or abusive behaviour	
Total for month	

Appendix 6 List of Resources, References & Websites

Organisation	Reference
Association of British Bookmakers (ABB)	www.abb.uk.com 020 7434 2111
BIS	Employment Regulations 2003 www.bis.gov.uk/whatwedo/employment/discrimination/emp-equality-regs-2003
BRC	British Retail Consortium http://www.brc.org.uk
Community Union	0800 389 6332
Crimestoppers	www.crimestoppers-uk.org 0800 555 111
HSE	<p>Work related violence toolkit: http://www.hse.gov.uk/violence/index.htm</p> <p>LBO example risk assessment: http://www.hse.gov.uk/risk/casestudies/pdf/bettingshop.pdf</p> <p>Training Information http://www.hse.gov.uk/business/training.htm</p> <p>Risk Assessment http://www.hse.gov.uk/pubns/indg.163.pdf</p> <p>Employee Involvement http://www.hse.gov.uk/involvement/index.htm</p> <p>Working Alone Safely http://www.hse.gov.uk/pubns/indg73.pdf</p> <p>Information and guidelines http://www.hse.gov.uk/pubns/hse31.pdf</p> <p>HSE's training advice publication http://www.hse.gov.uk/pubns/indg345.pdf</p>
ICM	Institute of Conflict Management http://www.conflictmanagement.org/icm/
Occupational health helpline	020 7203 1871
RIDDOR	Reporting http://www.riddor.gov.uk

Scottish Centre for Healthy Working Lives		http://www.healthy workinglives.com Advice line: 0800 019 2211
TUC	Trade Union Congress	http://www.tuc.org.uk
Victim Support		http://www.victimsupport-gm.co.uk/index.html

Appendix 7 Example Incident Report Form

Name of staff member and Job Title _____

Date _____

Time _____

Location of Incident _____

Type of incident, whether face to face or by telephone:-

Assault – customer on staff Assault – customer on customer Robbery - attempted

Robbery - actual Criminal damage - retail Criminal damage – gaming machines

Aggressive or abusive behaviour

Any other form of violence please describe below

Account of what happened (including details of injuries and damage)

Name of Assailant (or description if name unknown, see overleaf)

Names and contact details of witnesses

Further investigation required

Date RIDDOR form submitted to Enforcing Authority _____

Police incident No. (if applicable) _____

Details of preventative measures implemented to prevent recurrence

Date employee informed of preventative measures taken to prevent recurrence _____

Working time lost _____

Line Manager / Responsible Person Signature _____ Date _____

If the attacker or aggressor is not known please use the pro forma overleaf to give as much information as possible as to their description

(Continued)

Description of person responsible

Sex	Male	<input type="checkbox"/>	Female	<input type="checkbox"/>						
Age	Under 16	<input type="checkbox"/>	16-24	<input type="checkbox"/>	25-50	<input type="checkbox"/>	over 50	<input type="checkbox"/>		
Build	Slim	<input type="checkbox"/>	Medium	<input type="checkbox"/>	Heavy	<input type="checkbox"/>				
Ethnic Appearance	White	<input type="checkbox"/>	Asian	<input type="checkbox"/>	Black	<input type="checkbox"/>	Mixed	<input type="checkbox"/>		
Facial Hair	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>						
Glasses	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>						
Hair Colour	Blonde	<input type="checkbox"/>	Brown	<input type="checkbox"/>	Black	<input type="checkbox"/>	Grey	<input type="checkbox"/>	Bald	<input type="checkbox"/>
	Red	<input type="checkbox"/>	Dyed	<input type="checkbox"/>						

Please describe.....

Accent	Local	<input type="checkbox"/>	Other (please state).....
--------	-------	--------------------------	---------------------------

Tattoo	Yes	<input type="checkbox"/>	Please describe.....
--------	-----	--------------------------	----------------------

Scar	Yes	<input type="checkbox"/>	Please describe.....
------	-----	--------------------------	----------------------

Clothing please describe

.....
.....

Other Witnesses	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----------------	-----	--------------------------	----	--------------------------

If yes, please give details

Appendix 8

Stakeholder Group Contact Details and Feedback

The stakeholder group formed to produce this document included representatives of the following organisations:

<p>Association of British Bookmakers (ABB) Norris House Norris Street London SW1Y 4RJ Email: mail@abb.uk.com Tel: 0207 434 2111</p>	<p>Betfred The Spectrum 56-58 Benson Road Birchwood WA3 7PQ Email: jim.winder@betfred.com Tel: 01925 285 075</p>
<p>Community Union 67-68 Long Acre Covent Garden London IG11 8HG Email: hardacre_chris@community-tu.org Tel: 01604 810 326</p>	<p>Coral Maritime House 1 Linton Road Barking WC2E 9FA Email: peter.meacock@galacoral.com Tel: 020 8507 5433</p>
<p>Department of Work and Pensions (DWP) Caxton House Tothill Street London SW1H 9DA Email: john.price@dwp.gsi.gov.uk Tel: 0207 449 5581</p>	<p>Institute of Conflict Management (ICM) 840 Melton Road Thurmaston Leicester LE4 8BN Email: sarahjsimpson@aol.com Tel: 0116 2640141</p>
<p>The Local Authorities Coordinators of Regulatory Services (LACORS) Local Government House Smith Square London SW1P 3HZ Email: charlotte.meller@lacors.gov.uk Tel: 0207 665 3870</p>	<p>Ladbrokes Imperial House Rayners Lane Harrow HA2 7JW Email: chris.ceronni@ladbrokes.co.uk Tel: 0208 868 8899</p>
<p>Metropolitan Police Service New Scotland Yard Broadway London SW1H 0BG Email: markhenry.beale@met.police.uk Tel: 07956 587 058</p>	<p>Northumbria Police Authority Crime Department Force Headquarters Ponteland NE20 0BL Email: robert.ryan.7268@northumbria.pnn.police.uk Tel: 01661 869 452</p>
<p>Rochdale Metropolitan Borough Council Environmental Health Service Telegraph House Baillie Street Rochdale OL16 1JH Email: gary.parkinson@rochdale.gov.uk Tel: 01706 924 225</p>	<p>Scottish Centre for Healthy Working Lives Princes Gate 3rd Floor Castle Street Hamilton ML3 6BU Email: linda.shanahan@health.scot.nhs.uk Tel: 0131 313 7585</p>
<p>Tote Douglas House Tote Park Chapel Lane Wigan WN3 4HS Email: dwood@tote.co.uk Tel: 01942 617 500</p>	<p>Tower Hamlets Council Environmental Health Mulberry Place 5 Clove Crescent London E14 2BG Email: david.tolley@towerhamlets.gov.uk Tel: 0207 364 6724</p>
<p>William Hill Greenside House 50 Station Road Wood Green London N22 7TP Email: bsouth@williamhill.co.uk Tel: 07786 693 036</p>	

The group welcomes your comments and suggestions. These should be sent to:

Association of British Bookmakers (ABB)

Norris House

Norris Street

London

SW1Y 4RJ

Email: mail@abb.uk.com

Tel: 0207 434 2111

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William Hill's Submission to the Haringey Scrutiny Committee

Introduction

William Hill (a FTSE 250 Company) is the UK's largest high street bookmaker with more than 2300 betting shops.

With its head office in Wood Green (employing over 150 staff) it operates 19 licensed betting shops within Haringey with a trading history dating back to 1961. Whilst the oldest current licence dates back to 1981, there were legacy licences and the two most recent licences were re-sites from premises very close by; aimed at improving the customer facilities. William Hill has not expanded its estate in Haringey post the implementation of the Gambling Act; in fact, it now operates one less licence than it did in 2009.

William Hill's betting shops are part of the fabric and culture of the community in Haringey and a proportion of Haringey residents, normally drawn from a very localised area in the vicinity of our shops, continues to engage in what, for most, is a social pastime costing a very small proportion of their total income. The average bet is typically about £8 but, the most frequently placed bet is about £3-4.

William Hill is a local company with its corporate headquarters based in Station Road Wood Green. In total, William Hill provides some 250 local jobs in the Borough and makes a significant contribution to the local economy with staff utilising local services and supporting local businesses. William Hill offers career opportunities for many employees and is a substantial national employer offering significant part time employment which caters for the varied needs of our workforce.

The table at Appendix A provides details of our betting shops including the dates that the current licences were granted.

William Hill's Position

General industry background has been provided by the Association of British Bookmakers whose submission we endorse.

As the largest betting shop operator in the Borough, it is arguable that William Hill would benefit most from a more restrictive regime that prevented commercial rivals appearing on the high street. However the changes made under the Gambling Act were designed to facilitate a market approach in return for greater levels of regulation over the industry and overall, we believe the industry and customers are better served by the current regime.

William Hill monitors the performance of its estate closely and as well as operating many profitable shops, it also has in it a tail of less profitable shops and also shops whose commercial performance could be improved by expanding or re-siting those premises. Like many industries, operating successfully in the current climate is difficult and despite what many people might speculate, a number of shops are likely to

close if local or national restrictions are placed on the industry. Resites typically occur where low profit shops are identified as likely to be more profitable following a resite; if this is precluded then the risk of closure with consequent job losses must increase.

With 26% of the betting shop market nationally, William Hill is prevented by current competition rules from making significant high street acquisitions, so in order to maximise the commercial potential of the organisation, the company has to retain the capability to relocate premises within an area without there being unfair restrictions on the grant of the necessary consents.

Betting shops have co-existed in the A2 Use Class Order from the outset some 20 years ago and this is not, as some have suggested, a new phenomenon. Betting Shops therefore almost by definition, exist in those areas which have been designated by the Local Planning Authority as being suitable for A2 use. New betting shop operators are not in any way exploiting the planning legislation they are simply operating (as they have for the last 20 years) within a Use Class specifically designed for their use as designated by the Local Planning Authority.

As far as property rentals are concerned we generally operate in the third tier of the retail rental market and the idea that we are paying high rents to prevent other businesses entering the high street is simply wrong. In reality, betting shops are filling what would otherwise, particularly in the current property market, be a vacant shop – they provide rental income for landlords (many of which are local) and flexible employment opportunities for local people. It should also be borne in mind that the High Street of today is not the same as it was 20 years ago; it is a fast moving and dynamic environment which will be the result of consumer demand and will no doubt, in another 20 years, be very different to what we see today. The simple reality is that a commercial over supply of betting shops in a particular location, will result in one thing and one thing alone – closures.

Whilst we respect the right of local people to influence their community, we also believe that the current regime does allow for legitimate challenge on the basis of evidence; as opposed to the industry or individual operators being the target of a political or moral campaign. Problem gambling (as evidenced by the Prevalence Study) has not increased in the UK between 1999 and 2007 and we are unaware of any evidence to suggest that a small increase in the number of betting shops (in a very limited number of areas) in any influences the incidence of problem gambling.

William Hill takes its regulatory and corporate social responsibilities very seriously. We make voluntary contributions towards research, education and treatment of problem gambling at three times the recommended contribution (£750K pa) and make other charitable donations.

It would be open to Haringey to commission research into the effect of betting shops in the Borough and apply for funding from the Responsible Gambling Fund which is wholly funded by gambling industry contributions.

Whilst we understand that the nature our business can by some be considered to be controversial, we believe in positive engagement with the community or their representatives, on the basis of an examination of objective evidence. We want to be regulated on the basis of evidence not false perception or misrepresentation.

Conclusions

- William Hill is a significant local employer providing local employment opportunities.
- There is no evidence to suggest that betting shops in Haringey have a detrimental effect on the local community; just the reverse.
- We regret that this issue appears to have been highly politicised, rather than there being constructive debate between those who are lobbying for change and the industry.
- There is no betting shop saturation in Haringey and a proper evaluation of the use of retail premises in the Borough e.g. relative number of premises in A2 use compared to other use classes will, we believe, prove this out.
- As a significant part of the community, William Hill welcomes a proper objective review of the evidence and, in light of existing levels of regulation, believes that there should be a full regulatory impact assessment of the effect of any proposed changes on the betting industry.
- Suggestions that there should be isolated changes to planning legislation is ill conceived and would damage William Hill's business and that of the wider high street betting industry.
- Policy should be made on the basis of objective evidence and research; not on the basis of unevicenced moral or social perceptions promoted by opponents of the betting industry.

Appendix A

Shop Name	Branch Address	Opening Date
LAWRENCE RD	120a/122 West Green Road, London	05 January 1993
HEWITT	519 Green Lanes, London	06 January 1995
ROYAL	438/440/442 High Road, Tottenham, London	01 August 1987
GRAND PARADE	435 Green Lanes, Harringay, London	30 May 1984
DOWNHILLS	297/299/301 West Green Rd, London	01 August 1981
SUFFIELD	703 Seven Sisters Road, London,	01 August 1987
ENTERPRISE	94/96 High Road, Tottenham, London	24 November 1995
TALBOT RD	85 Broad Lane, Tottenham, London	10 February 1986
ACACIA	618/620 Lordship Lane, Wood Green, London	01 September 1988
MUSWELL HILL	303 Muswell Hill Broadway, London	01 October 1993
WOOD GREEN	8 The Broadway, High Road, Wood Green, London	15 October 1993
LORDSHIP LANE	427 Lordship Lane, London,	01 October 1995
SPURS	728/730 High Road, Tottenham, London	29 January 1997
TURNPIKE	17 High Road, Wood Green, London	11 January 1984
BRUCE GROVE	110/111/112 Bruce Grove, Tottenham, London	01 August 2003

CLYDE RD	375/377 High Road, Tottenham, London	20 November 1986
PHILIP LANE	276 Philip Lane, Tottenham, London	25 December 1985
WHITE HART LANE	793/795 High Road, Tottenham, London	11 October 2007
WALDECK	Part Ground Floor, 472/480 West Green Road, London	02 July 2008

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Haringey Metropolitan Police Response to the Haringey Overview & Scrutiny Committee: The clustering of betting shops in Haringey

Report by Police Sergeant Chris Weston-Moore - Problem Oriented Policing Advisor

& James Coleman - Police Performance Analyst

Introduction

The implementation of the Gambling Act 2005 heralded an increase in volume and concentration of betting shops on Haringey borough (since 2007 ten new premises have been opened and account for 14.9% of all bookmakers). There has recently been an interest from both statutory partners (problem solving group looking at the impact of betting shops – chaired by Urban Environment at Haringey Council) and the local community (public demonstrations in September/October 2010) at the perceived proliferation of betting shops in the borough. It has been suggested that betting shops are significantly contributing to both crime and anti-social behaviour and consequently have a detrimental effect on the local community.

The Gambling Act 2005 introduced a two tier regulation system whereby Operators obtain a licence from the Gambling Commission then apply for a betting premises licence from the local authority. It is recognised that in Haringey, decisions made by the local licensing authority have been overturned at appeal by the local courts. It is also acknowledged that the Gambling Act 2005 removed any restrictions on operators where they had to prove ‘an un-stimulated demand’, simple competition and market forces now dictate where an operator might decide where to open a betting shop, hence the clustering.

To evaluate the validity of these concerns, appropriate research and analysis must be conducted. This will accurately pinpoint the issues associated with betting shops and enable the design of relevant and effective long-term responses. The statistics presented have been extrapolated from police systems covering a six-month period commencing the 1st of April 2010.

This report endeavours to provide a holistic overview of the current level of criminality associated with local gambling premises. This will be achieved by focusing on localities with a high concentration of premises and the quantitative and qualitative impact that this has on the local community.

Geographical Analysis

Haringey has a total of 66 betting shops that are widely dispersed across the borough. Ladbrokes and William Hill account for 71.2% of premises, however, this dominance is in rapid decline as other operators noticeably increase their market share, for example Paddy Power has opened one premises a year since 2007.

The geographical distribution of premises highlights an elevated concentration in the more deprived areas of the borough. This may be coincidental, as businesses in general tend to migrate towards areas with a greater population density in order to expand their customer base and ultimately maximise profit margins.

Four distinct concentrations (defined as an area with a significant disproportional density of gambling premises) have been identified in Haringey - two in Wood Green (at opposite ends of the High Road), one at Bruce Grove (at the junction with Tottenham High Road) and one along Green Lanes. It should be noted that several areas (with the addition of another gambling premises) have the potential to become a concentration within Haringey.

General Overview

A total of 200 incidents relating to betting shops have been reported to police, this equates to 0.4% of all call demand over six-months, however this marginal figure might not be completely accurate as conditions relating to the licensing of bookmakers may actively encourage under-reporting to the police.

William Hill reported more incidents (90 in total) comparative to other bookmakers; however, they recorded an average incident rate per premises of 4.5 - the same as Betfred and less than Paddy Power (6.3 incidents per premises). Ladbrokes (who own the most premises in Haringey) recorded an incident rate per premises of 1.8.

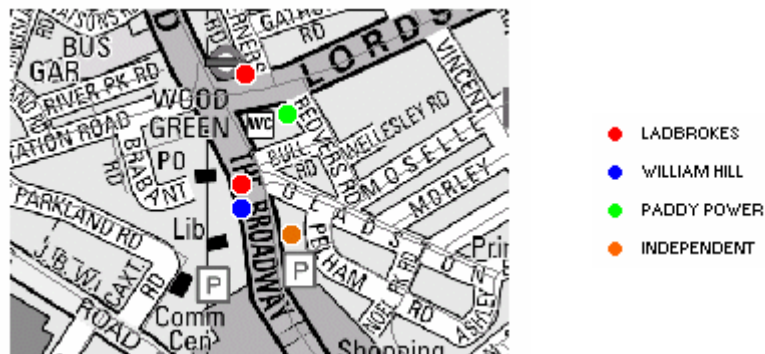
A total of 136 offences (an average of 22.6 per month) have been recorded with criminal damage offences accounting for 58.1% of the total. A majority of these criminal damage offences (88.6% - 70 crimes) relate specifically to gaming machines, with detailed analysis of the individual crime reports indicating that the criminal damage occurs most frequently after customers lose.

Individual betting shops are not crime generators, however where there is a concentration of premises the increase in incidents impacts significantly on public perception, this is further amplified where the concentrations are situated in known crime and disorder hotspots.

There is some very good practice in place in most of the betting shops in the borough. This varies depending upon the skills and confidence of the staff in the individual shops.

Focus - Wood Green: North High Road

Historically this area has been a focal point for disorder and gang activity, with the causality being attributed to the exceptional transport and leisure facilities that attract a large volume of young individuals. The area currently consists of 5 gambling



premises:

These 5 premises have reported a total of 27 incidents (accounting for 13.5% of the total call demand pertaining to gambling premises) over the reporting period. In terms of numerical volume the number of reported incidents per business is relatively equal (with the exception of the independent bookmakers who reported none).

The fact that William Hill (the only known business to have a 'positive reporting policy') recorded a similar number of incidents as the other bookmakers is surprising, however, when compared to the number of recorded offences it becomes apparent that both Ladbrokes and Paddy Power only contact police regarding more serious matters (again this suggests an element of under reporting that is possibly tied to preventing a revoke of their license).

A majority of the incidents reported were concerned with rowdy and inconsiderate behaviour (17 calls - 63.0%) and highlight a possible anti-social behaviour issue. Closer analysis of the data highlights a significant increase in calls emanating from the Paddy Power premises, equating to 42.9% of calls over the past three months and 50.0% of calls during September.

Police intelligence indicates that the Paddy Power premises is being frequented by a large group of youths who wish to play the gaming machines. The catalyst for disorder is when the staff remove the underage young people from the premises. The

premises (which has only been recently opened) is located in the centre of a known disorder hotspot and although the premises is not the cause of the disorder it is currently a significant contributing factor in the area.

This highlights a perception that the current licensing legislation does not have the ability to effectively manage and affect the suitability of some new premises locations, for example an application to open a betting shops at 261A High Road, Tottenham has been received. The proposed venue is already in a known disorder hotspot (with youth violence, robbery and gang activity) and similar to the aforementioned Paddy Power premises could create a focal point and catalyst for further crime and disorder in the area.

Other Issues

Green Lanes has been identified as an area of concern in relation to disorder in the vicinity of the gambling premises. Intelligence suggests that a significant number of incidents are related to intimidation (including sexual harassment) from individuals smoking outside the gambling premises.

One hypothesis around the issues in Green Lanes and the anti-social behaviour is the proximity of the betting shops to social housing that predominantly house vulnerable adults. Intelligence suggests that these vulnerable people frequent eh betting shops in Green Lanes.

Recommendations

The following bullet point summary details possible responses to reduce the impact of betting shops on Haringey (this list is not exhaustive and is for guidance only):-

- A stronger partnership with the operators – The Strategic partnership could work with the operators to suggest more consideration to the location of new premises; this would potentially prevent both concentrations of premises and premises in unsuitable locations (crime and disorder hotspots).
- Restriction of Machines – the licensing authority might want to consider a discussion or condition asking that the location and number of machines in a betting shop be carefully placed to discourage the opportunity for underage players to access them and reduce the possibility of criminal damage offences.

- Evidence for licensing applications - the police could review their processes for gathering evidence in support of or challenging a licence application when notice of an application is made to them. Similarly a stronger working relationship with the regional managers of the betting shops could improve the situation in specific shops or locations.
- Banning Orders – Some of the shops have used banning orders once they have identified persistent problem individuals at premises. This would need enforcement support from all partners.
- Improved Signage - clear messages regarding Anti-Social Behaviour, Criminal Damage and underage gaming and the associated consequences of committing an offence would act as a deterrent.
- Improved Communication - betting shops should be encouraged to inform the police of any issues or crime more promptly as the practice of not calling police to avoid recorded incidents leads to inaccurate assumptions being concluded.
- Smoking Areas - the introduction of smoking facilities at the rear of the betting shops (particularly in Green Lanes) would remove the perception of intimidation and prevent any sexual harassment in the street.

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We're there
when the odds
are stacked
against you

Statistics 2009/10



STATISTICS 2009/10

VISITS TO OUR WEBSITES	3
Participation in online self-help support services.....	3
CALLS TO THE HELPLINE AND NETLINE	4
Calls	4
Volume of calls	4
Call volumes in 2008/09 benefitted from our healthcare and help agency pathfinder which, unfortunately, we were unable to build upon because of lack of funds.	4
Inbound, answered and target calls	4
Distribution of calls month by month	4
Initial source of information about HelpLine and NetLine	6
Caller type	7
Callers who have called before	7
Caller type by gender	7
Age of callers.....	7
Gambling Profile	8
Gambling activities.....	8
Gambling activities and age	9
Gambling facilities and age.....	10
Gambling activities, facilities and gender	10
Impacts of Problem Gambling	13
Most common impacts of problem gambling disclosed by callers	13
Callers who discussed and disclosed debt.....	13
Debt disclosed by callers	13
Debt disclosed by gamblers, their partners, and family members/friends.....	13
Signposting Destinations	14
Note: callers can be signposted to more than one destination	14
Summary of signpostings from HelpLine and NetLine	14
COUNSELLING SERVICES	15
Sessions delivered.....	15
Source of referral to GamCare Counselling.....	15
Gambling activities and age of clients	16
Gambling facilities and age of clients	16
Gambling activities and gender of clients.....	17
Gambling facilities and gender of clients	17
Number of years clients had been gambling.....	17
Debts disclosed by clients	18
Counselling outcome	Error! Bookmark not defined.

VISITS TO OUR WEBSITES

Unique visitors	2009/10	2008/09
www.gamcare.org.uk and secure site*	272,477	191,402
www.gamcaretradeservices.com	6,972	1,845
TOTAL	279,449	193,247

*NetLine and OnLine Counselling

Visits to www.gamcare.org.uk	2009/10	2008/09
n=	398,335	315,856
Traffic source		
Other websites*	37%	25%
Direct	34%	40%
Search engines**	29%	35%
Specifically Google	25%	29%

*including gambling and affiliate sites

**5,300 visitors to www.gamcare.org.uk typed in 'gamcare.org.uk' to a search engine, compared to just over 600 in 2008/09.

We are the recipients of a Google Grant which provides us with free online advertising on Google Adwords. In 2009/10 our Adword campaign generated over 13,000 clicks at a cost equivalent of over \$8,000.

Visits to secure site	2009/10	2008/09
n=	33,651	10,196
Traffic source		
Other websites*	82%	82%
Direct	18%	17%
Search engines	0%	0%

*primarily www.gamcare.org.uk

Visits to www.gamcaretradeservices.com	2009/10	2008/09
n=	7,853	2,820
Traffic source		
Other websites	73%	54%
Direct	14%	26%
Search engines	13%	20%

Participation in online self-help support services

Online support	2009/10	2008/09
New posts by Forum users	26,926	27,199
New Forum users	1,825	1,003
Chat Room sessions offered	459	444

CALLS TO THE HELPLINE AND NETLINE

Calls

Volume of calls

Call volumes in 2008/09 benefitted from our healthcare and help agency pathfinder which, unfortunately, we were unable to build upon because of lack of funds.

	2009/10	2008/09
Calls answered	35,337	36,295
HelpLine calls	28,071	31,346
NetLine calls	7,266	4,949

Inbound, answered and target calls

	2009/10			2008/09		
	HL	NL	TOTAL	HL	NL	TOTAL
Inbound Calls (for NL: from UK only)	35,435	11,085	46,520	40,579	9,929	50,508
Answerable Calls	32,385	9,484	41,869	36,793	7,326	44,119
Answered Calls	28,071	7,266	35,337	31,346	4,949	36,295
Success Rate	86.7%	76.6%	81.7%	85.2%	67.6%	82.3%
Target Calls	9,127	6,134	15,261	11,102	4,643	15,745
Non-Target Calls	12,335	197	12,532	13,840	135	13,975
Unknown	2,896	2,284	5,180	3,496	1,549	5,045

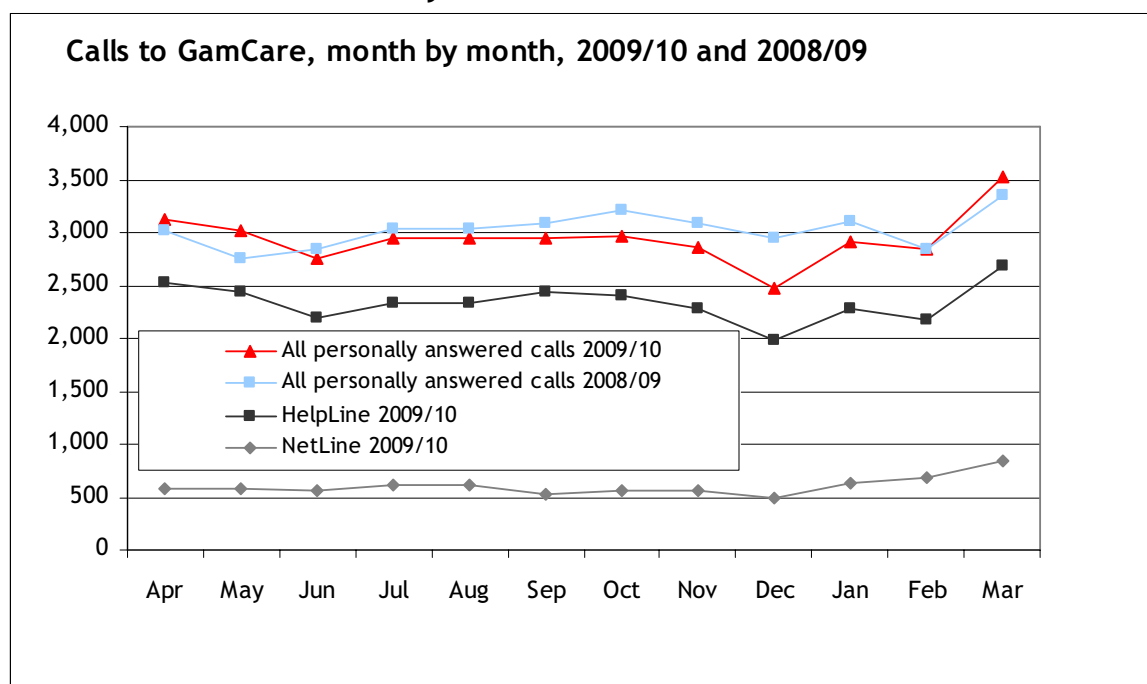
Inbound calls: total calls received, including out-of-hours, callers hanging up etc

Answerable calls: calls received in business hours and not abandoned by caller

Answered calls: calls answered by advisers

Target calls: calls relevant to the purpose of the helpline (most common non-target calls are asking for information about the National Lottery)

Distribution of calls month by month



Caller location

Location of HelpLine callers as identified by the Virtual Call Centre

Caller location	Percentage of total (n = 35,423)
Mobile Phone	32%
South East	9%
London	9%
North West	6%
Scotland	5%
West Midlands	4%
South West	4%
East Midlands	4%
Eastern	3%
Yorkshire and Humber	3%
North East	3%
Wales	2%
Nothern Ireland	1%
Isle of Man	0.02%
Jersey	0.01%
Guernsey	0.01%
ROI	0.00%
Unknown	16%

Location of callers from mobile phones and to the NetLine
Where this information was disclosed to the adviser

Location	Percentage of total UK (n = 7443)
North East	5%
North West	14%
Yorkshire and Humber	7%
East Midlands	8%
West Midlands	7%
Eastern	9%
South East	13%
South West	7%
London	15%
Northern Ireland	2%
Scotland	8%
Wales	4%

Caller Profile

Initial source of information about HelpLine and NetLine

Source of Information	2009/10			2008/09			
	n=	6689	1744	8433	6713	1555	8268
		HelpLine	NetLine	Overall	HelpLine	NetLine	Overall
Arcade Leaflet		1%	1%	1%	2%	2%	2%
Bingo Leaflet		0%	1%	1%	1%	1%	1%
Bookmaker Leaflet		18%	10%	16%	21%	10%	19%
Casino Leaflet		1%	1%	1%	2%	2%	2%
FOBT Machine		0%	0%	0%	2%	0%	2%
Fruit/Slot Machine		8%	2%	7%	4%	1%	3%
Gamblers Anonymous		0%	1%	0%	0%	1%	1%
Gambling Therapy		0%	0%	0%	0%	0%	0%
GamCare Website		15%	11%	14%	13%	12%	13%
National Lottery		9%	0%	7%	7%	0%	5%
Lotto Results		1%	0%	1%	0%	0%	0%
Media		1%	1%	1%	1%	1%	1%
Other Helpline/Agency		2%	1%	2%	2%	1%	2%
Other Leaflet		0%	1%	0%	0%	1%	0%
Other Website, primarily Google		5%	60%	17%	6%	60%	16%
Poster/Leaflet Campaign		0%	1%	0%	1%	1%	1%
Professional		4%	1%	3%	3%	1%	3%
Racecard		0%	0%	0%	0%	0%	0%
Scratchcard		4%	0%	3%	3%	0%	3%
Telephone directory		8%	0%	7%	8%	0%	7%
Word of mouth		7%	6%	7%	6%	5%	6%
Yellow Pages		13%	0%	10%	17%	1%	14%

Summary of sources of information

Source of Information	2009-10	2008-09
Industry leaflets, stickers, tickets etc	38%	37%
Other website	17%	16%
Telephone directories	17%	20%
GamCare website	14%	13%
Word of mouth	7%	6%
Health professionals and other agencies	5%	5%

Caller type

Type of Caller	2009/10			2008/09			
	n=	8682	5705	14387	10763	4244	15007
		HelpLine	NetLine	TOTAL	HelpLine	NetLine	TOTAL
Gambler		68%	81%	73%	67%	79%	70%
Partner		6%	10%	8%	6%	10%	7%
Family Member / Friend		17%	8%	14%	19%	7%	15%
Gambler working in Industry		0%	1%	1%	0%	2%	1%
Gambling Industry		1%	0%	1%	2%	0%	1%
Media		1%	0%	0%	0%	0%	0%
Other		1%	0%	1%	1%	1%	1%
Professional		5%	0%	3%	4%	0%	3%
Student (research enquiry)		0%	0%	0%	0%	0%	0%

Callers who have called before

Repeat callers	HelpLine	NetLine	TOTAL
As a percentage of target calls	22%	27%	24%

Caller type by gender

Gender	n=	2009/10			2008/09		
		3513	8945	12458	3672	9099	12771
		Female	Male	TOTAL	Female	Male	TOTAL
Gambler		38%	90%	75%	37%	89%	74%
Partner		24%	1%	8%	24%	1%	7%
Family Member / Friend		28%	5%	12%	29%	6%	12%
Gambler working in Industry		0%	1%	1%	0%	1%	1%
Gambling Industry		1%	1%	1%	1%	1%	1%
Professional (health, counselling, advice etc)		7%	1%	3%	7%	1%	3%
Media enquiry		1%	0%	0%	1%	0%	0%
Other		1%	0%	1%	2%	0%	1%

Age of callers

Age of Caller	n=	2009/10			2008/09		
		2178	2203	4381	2285	1421	3706
		HelpLine	NetLine	TOTAL	HelpLine	NetLine	TOTAL
Under 18		1%	2%	2%	1%	5%	3%
18-25		27%	45%	36%	28%	46%	35%
26-35		25%	34%	30%	26%	33%	28%
36-45		28%	13%	20%	29%	10%	22%
46-55		11%	4%	7%	9%	5%	8%
56-65		5%	2%	3%	4%	1%	3%
66+		3%	0%	2%	2%	0%	1%

Gambling Profile

Number of years gambler callers had been gambling

Callers had been gambling for:	2009/10			2008/09		
	2840	2464	5304	2766	1687	4453
	HelpLine	NetLine	Overall	HelpLine	NetLine	Overall
Less than 5 years	48%	56%	52%	51%	63%	55%
6-10 years	21%	23%	22%	17%	17%	17%
11-15 years	7%	8%	8%	8%	8%	8%
16-20 years	10%	6%	8%	12%	5%	10%
Over 21 years	13%	7%	10%	13%	7%	10%

Gambling activities

Gambling activities	2009/10			2008/09		
	6856	6166	13022	7501	4843	12344
	HelpLine	NetLine	TOTAL	HelpLine	NetLine	TOTAL
Betting	31%	30%	31%	33%	25%	30%
Bingo	2%	5%	3%	2%	4%	3%
FOBTs	30%	13%	22%	29%	16%	24%
Fruit/Slot Machines	16%	20%	18%	17%	14%	16%
National Lottery Draw	1%	1%	1%	1%	0%	0%
Poker	3%	7%	5%	4%	8%	5%
Roulette Machines	7%	10%	9%	5%	4%	5%
Scratchcards	2%	1%	2%	2%	1%	2%
Spread Betting (General)	0.3%	0.4%	0.3%	0.3%	0.3%	0.3%
Spread Betting: Financial	0.2%	0.1%	0.2%	0.3%	0.2%	0.3%
Spread Betting: Sports	0.5%	0.2%	0.3%	0.5%	0.3%	0.4%
Stock Market	0.1%	0.1%	0.1%	0.1%	0.3%	0.2%
Table Games	6%	11%	8%	6%	26%	14%

Note: each caller can give more than one gambling activity, e.g. betting in betting shop and on the Internet, bingo and fruit/slot machines on the Internet

Gambling facilities

Gambling facilities	2009/10			2008/09		
	6979	7008	13987	7641	5307	12948
	HelpLine	NetLine	TOTAL	HelpLine	NetLine	TOTAL
Arcade	6%	4%	5%	7%	4%	6%
Betting Shop	61%	37%	49%	61%	33%	49%
Bingo Hall	2%	2%	2%	2%	1%	2%
Casino	7%	9%	8%	7%	15%	10%
Internet	16%	41%	29%	15%	42%	26%
On Course	0%	0%	0%	0%	0%	0%
Pub / Club	3%	4%	4%	3%	3%	3%
Service Station	0%	0%	0%	0%	0%	0%
Telephone	2%	1%	1%	2%	1%	1%
Television	0%	0%	0%	0%	0%	0%
Other	2%	1%	2%	3%	1%	2%

Note: each caller can give more than one gambling facility, e.g. betting in betting shop and on the Internet, bingo and fruit/slot machines on the Internet

Gambling activities and age

Gambling activities	2009/10						2008/09							
	61	2235	1967	1250	366	131	53	114	1831	2063	1168	370	116	33
	Under 18	18-25	26-35	36-45	46-55	56-65	66+	Under 18	18-25	26-35	36-45	46-55	56-65	66+
Betting	23%	28%	26%	43%	43%	31%	36%	16%	26%	21%	55%	41%	38%	42%
Bingo	0%	1%	4%	2%	4%	5%	11%	0%	1%	1%	2%	4%	2%	0%
FOBTs	20%	23%	21%	23%	23%	17%	15%	28%	26%	19%	19%	25%	20%	24%
Fruit/Slot Machines	30%	17%	24%	15%	15%	23%	25%	28%	17%	12%	10%	14%	16%	24%
National Lottery Draw	0%	0%	0%	0%	1%	2%	0%	1%	0%	0%	1%	1%	1%	0%
Poker	3%	8%	4%	2%	3%	2%	0%	11%	9%	3%	3%	4%	0%	0%
Roulette Machines	10%	9%	5%	4%	4%	7%	6%	1%	6%	3%	4%	2%	8%	6%
Scratchcards	10%	1%	1%	2%	1%	5%	4%	7%	2%	1%	1%	1%	9%	3%
Spread Betting (General)	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%
Spread Betting: Financial	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%
Spread Betting: Sports	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	1%	2%	0%
Stock Market	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Table Games	3%	12%	14%	6%	5%	6%	4%	9%	12%	38%	5%	6%	4%	0%
Other	2%	0%	0%	0%	0%	2%	0%	0%	0%	0%	0%	0%	0%	0%

Gambling facilities and age

Gambling facilities n=	2009/10										2008/09				
	67	2423	2106	1313	385	140	52	118	1909	2090	1183	369	120	32	
	Under 18	18-25	26-35	36-45	46-55	56-65	66+	Under 18	18-25	26-35	36-45	46-55	56-65	66+	
Arcade	19%	4%	7%	5%	6%	11%	10%	17%	5%	5%	5%	7%	8%	16%	
Betting Shop	48%	45%	38%	53%	59%	51%	60%	43%	48%	35%	67%	51%	54%	66%	
Bingo Hall	0%	1%	3%	2%	2%	1%	15%	0%	0%	1%	1%	2%	6%	6%	
Casino	9%	10%	11%	5%	5%	6%	0%	3%	8%	26%	4%	4%	8%	3%	
Internet	9%	34%	31%	26%	22%	20%	12%	21%	31%	28%	16%	30%	11%	0%	
On Course	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	1%	1%	1%	0%	
Pub / Club	4%	4%	7%	2%	1%	3%	0%	12%	6%	2%	2%	2%	1%	0%	
Service Station	1%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	1%	0%	0%	
Telephone	0%	0%	1%	5%	3%	1%	2%	0%	1%	1%	2%	1%	2%	3%	
Television	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	1%	0%	
Other	9%	1%	1%	2%	2%	7%	2%	4%	1%	1%	1%	1%	9%	0%	

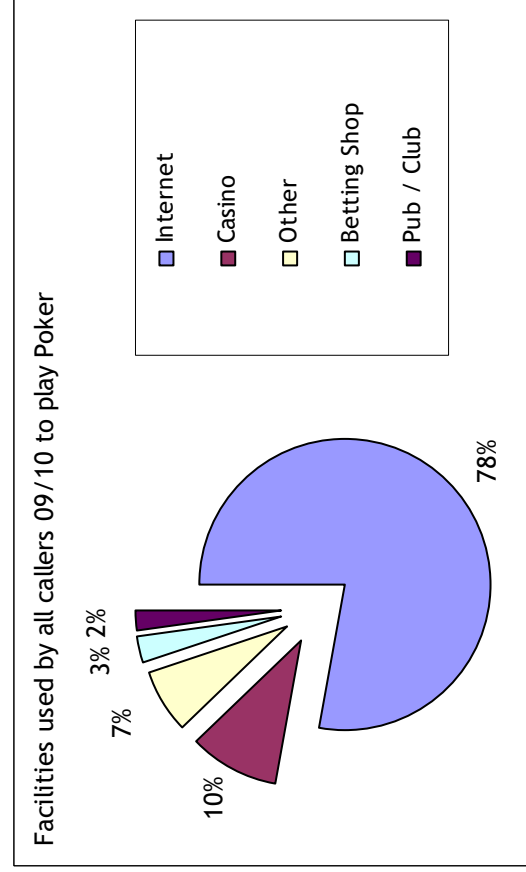
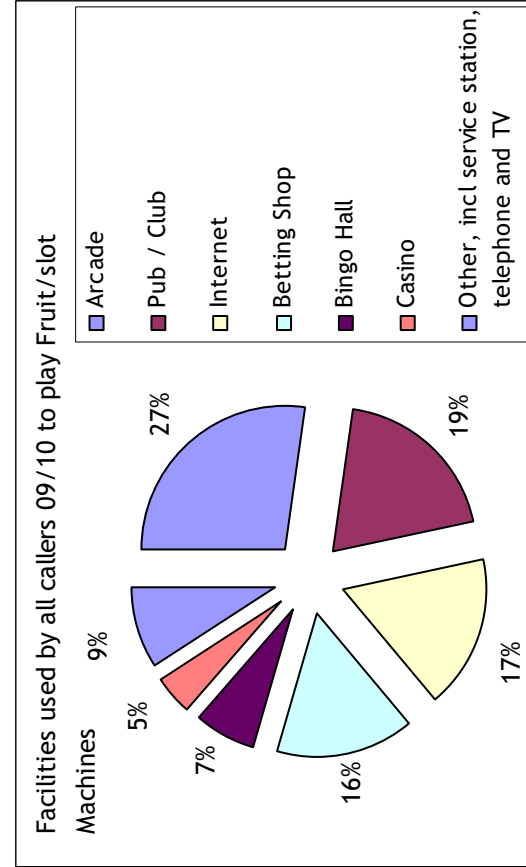
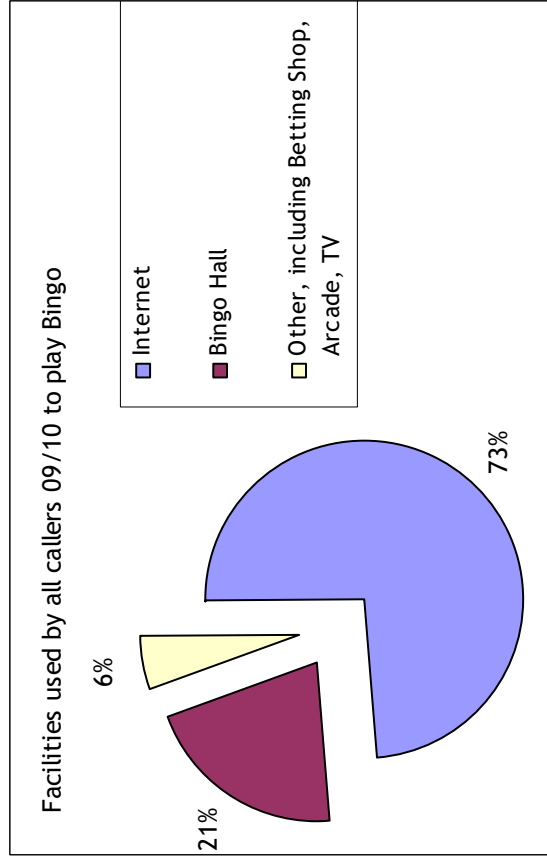
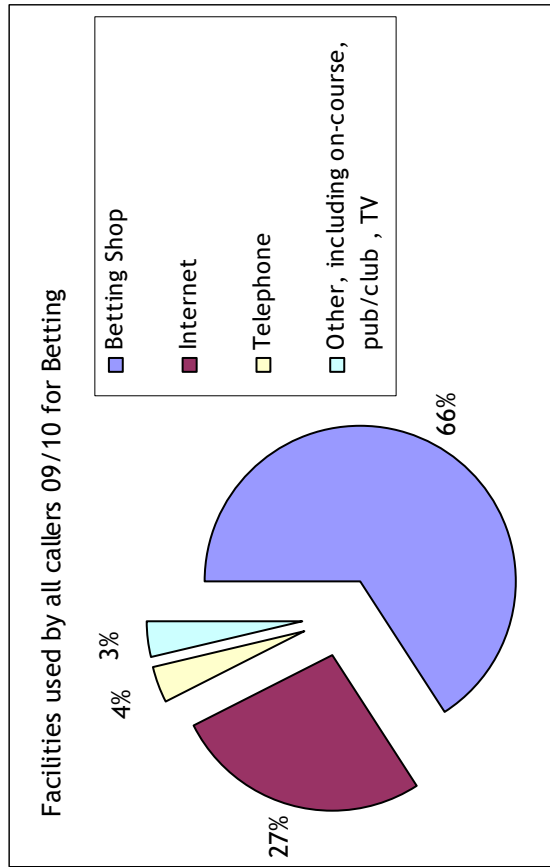
Gambling activities, facilities and gender

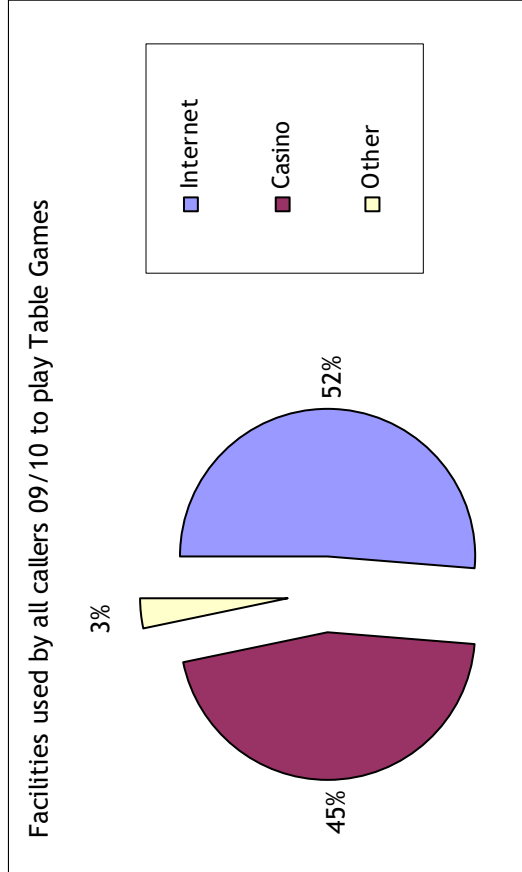
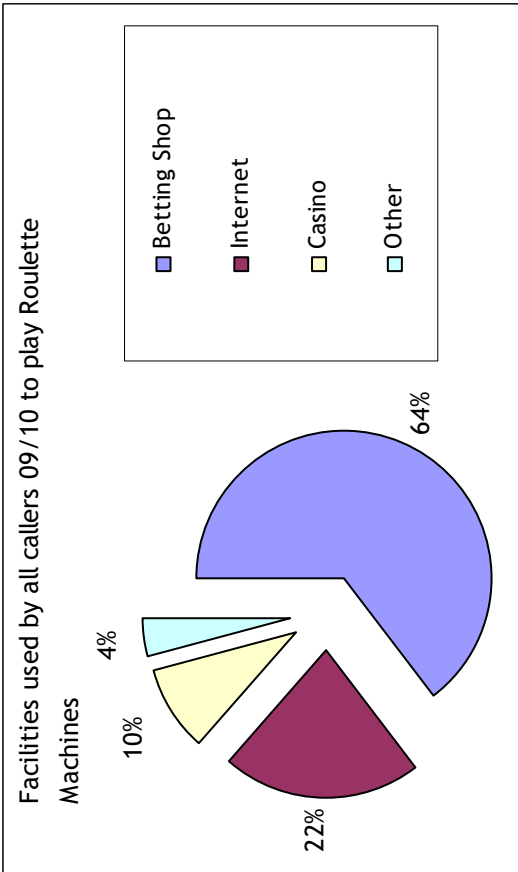
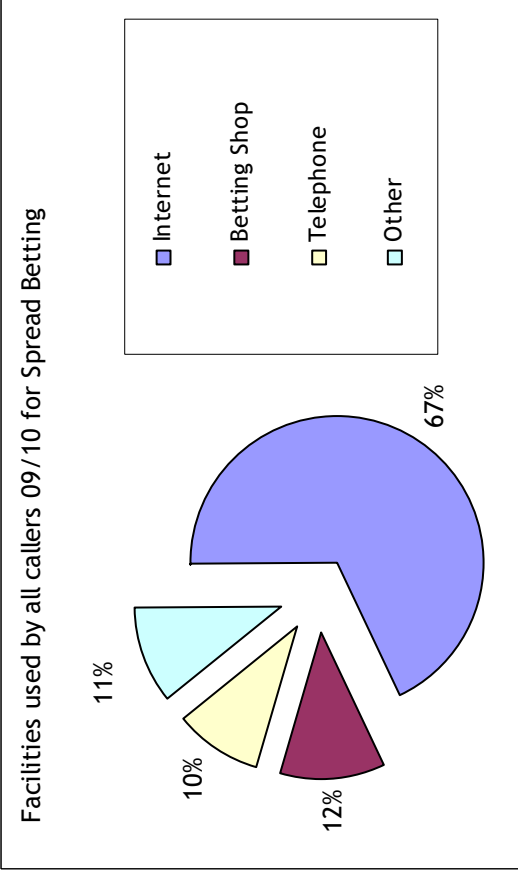
Gambling activities n=	2009/10				2008/09			
	1593	10125	1328	8025	1697	10692	1958	9647
	Female	Male	Female	Male	Female	Male	Female	Male
Betting	8%	35%	9%	41%	12%	4%	13%	5%
Bingo	19%	1%	15%	1%	12%	55%	9%	59%
FOBTs	8%	25%	10%	32%	9%	1%	8%	0%
Fruit/Slot Machines	36%	15%	38%	15%	12%	8%	26%	7%
National Lottery Draw	1%	1%	16%	1%	47%	24%	38%	21%
Poker	3%	5%	0%	0%	2%	4%	1%	3%
Roulette Machines	5%	9%	0%	0%	0%	0%	0%	0%
Scratchcards	6%	1%	3%	6%	1%	2%	0%	2%
Spread Betting (General)	0%	0%	9%	3%	0%	0%	0%	0%
Spread Betting: Financial	0%	0%	0%	0%	0%	0%	0%	0%
Spread Betting: Sports	0%	0%	0%	0%	1%	0%	0%	0%
Stock Market	0%	0%	0%	1%	0%	0%	0%	0%
Table Games	14%	7%	0%	0%	4%	1%	4%	1%
Other	0%	0%	1%	0%	0%	0%	0%	0%

Gambling facilities n=	2009/10				2008/09			
	1697	10692	1958	9647	1697	10692	1958	9647
	Female	Male	Female	Male	Female	Male	Female	Male
Arcade	12%	4%	13%	5%	12%	4%	13%	5%
Betting Shop	12%	55%	9%	59%	12%	55%	9%	59%
Bingo Hall	9%	1%	8%	0%	9%	1%	8%	0%
Casino	12%	8%	26%	7%	12%	8%	26%	7%
Internet	47%	24%	38%	21%	47%	24%	38%	21%
Pub / Club	2%	4%	1%	3%	2%	4%	1%	3%
Service Station	0%	0%	0%	0%	0%	0%	0%	0%
Telephone	1%	2%	0%	2%	1%	2%	0%	2%
Television	0%	0%	0%	0%	0%	0%	0%	0%
Other	4%	1%	4%	1%	4%	1%	4%	1%

Facilities used for gambling activities

Note: each caller can give more than one gambling activity and facility, e.g. betting in the betting shop and on the Internet, playing bingo and fruit/slot machines on the Internet





Impacts of Problem Gambling

Most common impacts of problem gambling disclosed by callers

Impact	n=	2009/10			2008/09		
		13552	1440	1595	12156	1610	1896
		Gambler	Partner	Family/ Friend	Gambler	Partner	Family/ Friend
Anxiety / Stress		47%	36%	43%	46%	35%	43%
Financial		31%	18%	11%	30%	21%	15%
Family/Relationship		23%	47%	46%	24%	44%	42%

Callers who discussed and disclosed debt

Disclosure of debt	n=	2009/10			2008/09		
		3909	146	80	3496	124	79
		Gambler	Partner	Family/ Friend	Gambler	Partner	Family/ Friend
None		13%	1%	4%	13%	13%	11%
Some		48%	71%	63%	49%	58%	66%
Disclosed amount of debt		39%	28%	34%	38%	29%	23%

Debt disclosed by callers

Amount of debt disclosed	n=	2009/10			2008/09		
		835	776	1611	826	556	1382
		HelpLine	NetLine	TOTAL	HelpLine	NetLine	TOTAL
Under 6K		38%	39%	39%	37%	39%	38%
6K-10K		15%	17%	16%	16%	20%	17%
11K-20K		19%	18%	19%	17%	15%	16%
21K-50K		16%	16%	16%	18%	19%	18%
51K-100K		5%	4%	5%	4%	5%	4%
100K and over		4%	2%	3%	4%	2%	3%
Bankruptcy		2%	2%	2%	4%	2%	3%
IVA		0%	1%	1%	1%	0%	1%

Debt disclosed by gamblers, their partners, and family members/friends

Amount of debt disclosed	n=	2009/10			2008/09		
		1543	41	27	1316	36	18
		Gambler	Partner	Family/ Friend	Gambler	Partner	Family/ Friend
Under 6K		39%	15%	33%	38%	19%	22%
6K-10K		17%	15%	7%	18%	6%	11%
11K-20K		18%	22%	26%	16%	8%	22%
21K-50K		16%	22%	15%	17%	47%	22%
51K-100K		4%	12%	19%	4%	3%	11%
100K and over		3%	5%	0%	3%	11%	11%
Bankruptcy		2%	10%	0%	3%	3%	0%
IVA		1%	0%	0%	0%	3%	0%

Signposting Destinations

Signposting from the HelpLine and NetLine n=	2009/10			2008/09		
	18652	13717	32369	20917	10158	31075
	HelpLine	NetLine	TOTAL	HelpLine	NetLine	TOTAL
GamCare Forum	2.8%	11.4%	6.4%	1.7%	8.9%	4.0%
GamCare HelpLine	22.9%	5.2%	15.4%	21.7%	7.8%	17.2%
GamCare NetLine	2.2%	14.7%	7.5%	1.3%	13.8%	5.4%
GamCare Website	10.9%	1.4%	6.8%	10.1%	3.1%	7.8%
GamCare Office	1.9%	0.5%	1.3%	1.8%	0.5%	1.3%
Industry	0.4%	0.4%	0.4%	0.7%	0.4%	0.6%
Software to block online gambling sites	4.0%	22.0%	12.0%	3.0%	13.0%	5.7%
Self Exclusion	9.1%	12.2%	10.4%	11.1%	13.7%	11.9%
Citizens Advice Bureau	1.0%	0.9%	1.0%	1.1%	1.0%	1.1%
Debtline	1.2%	3.2%	2.0%	1.1%	3.2%	1.8%
Gamblers Anonymous	13.2%	5.4%	9.9%	15.8%	7.0%	12.9%
Gam-Anon	0.8%	1.3%	1.0%	0.8%	1.1%	0.9%
Gambling Therapy (residential)	0.4%	0.2%	0.3%	0.3%	0.0%	0.2%
Gordon House (residential)	0.4%	0.3%	0.3%	0.5%	0.4%	0.5%
GP / Other Professional	3.5%	1.1%	2.4%	4.3%	2.2%	3.6%
BACP	1.2%	0.3%	0.8%	1.4%	0.7%	1.2%
GamCare Counselling (OnLine)	1.4%	3.7%	2.4%	0.6%	2.7%	1.2%
GamCare Counselling (London)	4.2%	2.6%	3.5%	4.9%	3.8%	4.5%
GamCare Counselling (Greater Manchester)	0.7%	0.4%	0.6%	0.0%	0.0%	0.0%
GamCare Counselling (Partners)	14.9%	9.3%	12.5%	13.7%	9.1%	12.2%
Not necessary	0.0%	0.1%	0.1%	0.1%	0.0%	0.0%
Other Agency	1.5%	1.7%	1.5%	2.2%	3.9%	2.7%
Other Helpline	0.6%	1.1%	0.8%	1.0%	2.0%	1.3%
Other Website	0.5%	0.5%	0.5%	1.1%	1.3%	1.1%

*For regions covered by current GamCare Partners go to <http://www.gamcare.org.uk/partners.php>

Note: callers can be signposted to more than one destination

Summary of signpostings from HelpLine and NetLine

All signpostings from HelpLine & NetLine	2009/10	2008/09
GamCare HelpLine, NetLine, Forum and website	38%	34%
GamCare Counselling services	19%	18%
Online blocking software	12%	6%
GA and Gam-Anon	11%	14%
Self exclusion	10%	12%
Other agencies	9%	9%
Other counselling or mental health services	4%	5%

COUNSELLING SERVICES

Clients seen

CLIENTS SEEN	2009/10	2008/09
TOTAL CLIENTS SEEN	2,085	1,556
GamCare Face to Face London and Manchester	12%	11%
GamCare OnLine	4%	3%
GamCare Partners	84%	86%
Type of client	2009/10	2008/09
Gambler	94%	92%
Partner or family member	6%	8%

Sessions delivered

SESSIONS DELIVERED	PAID COUNSELLING SESSIONS 2009/10*	PAID COUNSELLING SESSIONS 2008/09*
*Attended, cancelled with less than 48 hours notice, or client did not attend		
TOTAL COUNSELLING SESSIONS DELIVERED	20291	13,894
GamCare Face to Face London and Manchester	16%	18%
GamCare OnLine	4%	3%
GamCare Partners	80%	79%

Source of referral to GamCare Counselling

Referral source, if given n =	2009/10				2008/09			
	257	35	2142	2434	101	27	1510	1638
	GamCare	OnLine	Partners	All	GamCare	Online	Partners	All
Charities	0%	0%	0%	0%	0%	0%	1%	1%
Community Mental Health Team	0%	0%	1%	1%	0%	0%	2%	2%
Debt Agency	0%	0%	0%	0%	0%	0%	0%	0%
Gamblers Anonymous	1%	0%	2%	2%	2%	0%	1%	1%
GamCare Helpline	51%	9%	47%	47%	55%	19%	52%	52%
GamCare Website (Forum)	15%	3%	5%	6%	2%	33%	5%	5%
Google	0%	0%	1%	1%	N/A	N/A	N/A	N/A
Gordon House	0%	0%	0%	0%	2%	0%	1%	1%
GP	1%	0%	3%	3%	1%	4%	3%	3%
HR Departments	0%	0%	0%	0%	0%	0%	0%	0%
Internal Screening	0%	0%	1%	1%	0%	0%	0%	0%
NetLine	2%	83%	2%	3%	1%	37%	1%	2%
Direct and other sources	26%	6%	28%	28%	35%	7%	25%	25%
Press/Media	1%	0%	1%	1%	N/A	N/A	N/A	N/A
Prison Service	0%	0%	0%	0%	0%	0%	2%	2%
Probation	1%	0%	1%	1%	2%	0%	2%	2%
Support Agencies	1%	0%	5%	5%	0%	0%	5%	5%
Yellow Pages	0%	0%	1%	1%	N/A	N/A	N/A	N/A

Gambling activities and age of clients

Gambling activities n =	2009/10							2008/09						
	11	1274	2161	1984	959	250	78	7	813	1861	1428	731	201	63
Under 18	0%	30%	32%	41%	46%	42%	36%	0%	29%	34%	43%	46%	39%	27%
Betting	0%	2%	3%	2%	3%	5%	10%	0%	2%	2%	2%	3%	5%	8%
Bingo	18%	15%	13%	12%	10%	11%	9%	14%	16%	11%	11%	9%	7%	10%
FOBTs	73%	17%	19%	18%	16%	19%	19%	86%	19%	15%	14%	12%	12%	17%
Fruit/Slot Machines	0%	2%	4%	3%	5%	6%	4%	0%	2%	4%	4%	6%	8%	8%
National Lottery Draw	0%	8%	6%	3%	2%	1%	3%	0%	8%	7%	4%	4%	3%	2%
Poker	0%	9%	7%	7%	5%	3%	3%	0%	6%	6%	5%	5%	4%	5%
Roulette Machines	0%	3%	3%	3%	2%	2%	5%	0%	3%	3%	3%	3%	5%	10%
Scratchcards	0%	0%	1%	1%	0%	1%	0%	0%	1%	1%	1%	0%	1%	0%
Spread Betting (General)	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Spread Betting: Financial	0%	0%	1%	0%	1%	0%	0%	0%	1%	1%	1%	0%	0%	0%
Spread Betting: Sports	0%	0%	0%	1%	0%	0%	1%	0%	0%	0%	1%	0%	0%	2%
Stock Market	0%	0%	0%	0%	1%	1%	3%	0%	0%	0%	1%	0%	1%	2%
Table Games	9%	10%	8%	6%	5%	5%	3%	0%	9%	8%	6%	6%	6%	2%
Other	0%	3%	3%	3%	4%	3%	5%	0%	5%	7%	5%	6%	7%	10%

Gambling facilities and age of clients

Gambling facilities n =	2009/10							2008/09						
	11	1274	2161	1985	960	250	78	7	802	1819	1413	719	200	61
Under 18	45%	6%	7%	6%	6%	5%	3%	Under 18	43%	6%	5%	4%	3%	5%
Arcade	36%	40%	39%	43%	44%	44%	47%	36-45	33%	33%	38%	39%	21%	28%
Betting Shop	0%	2%	2%	1%	3%	5%	10%	18-25	2%	1%	1%	2%	1%	11%
Bingo Hall	18%	10%	7%	7%	5%	4%	5%	46-55	8%	8%	7%	7%	5%	8%
Casino	0%	13%	16%	14%	11%	8%	0%	56-65	11%	15%	13%	10%	4%	0%
Internet	0%	1%	1%	2%	3%	0%	0%	26-35	1%	1%	3%	3%	0%	3%
On Course	0%	7%	5%	4%	3%	3%	0%	18-25	7%	3%	4%	3%	1%	0%
Pub / Club	0%	1%	1%	0%	0%	0%	0%	36-45	0%	1%	0%	0%	1%	2%
Service Station	0%	1%	2%	2%	1%	2%	0%	46-55	2%	2%	2%	1%	0%	0%
Telephone	0%	0%	0%	0%	1%	0%	0%	56-65	1%	0%	1%	1%	0%	0%
Television	0%	0%	0%	0%	1%	0%	0%	66+	1%	0%	1%	1%	0%	0%
Other	0%	19%	22%	21%	23%	29%	35%	66+	21%	29%	25%	30%	64%	43%

Gambling activities and gender of clients

Gambling activities of clients n =	2009/10			2008/09		
	615	6158	6773	393	4746	5139
	Female	Male	TOTAL	Female	Male	TOTAL
Betting	11%	40%	37%	14%	41%	39%
Bingo	15%	1%	3%	17%	1%	3%
FOBTs	5%	13%	13%	3%	12%	12%
Fruit/Slot Machines	41%	16%	18%	37%	14%	16%
National Lottery Draw	5%	4%	4%	7%	4%	4%
Poker	3%	5%	5%	3%	6%	6%
Roulette Machines	3%	7%	7%	2%	6%	6%
Scratchcards	7%	3%	3%	8%	3%	4%
Spread Betting (General)	0%	1%	1%	0%	1%	1%
Spread Betting: Financial	0%	0%	0%	0%	0%	0%
Spread Betting: Sports	0%	1%	0%	0%	1%	1%
Stock Market	0%	0%	0%	0%	0%	0%
Table Games	6%	7%	7%	5%	8%	8%
Other	3%	2%	2%	3%	2%	2%

Gambling facilities and gender of clients

Gambling facilities of clients n =	2009/10			2008/09		
	633	6250	6883	412	4870	5282
	Female	Male	TOTAL	Female	Male	TOTAL
Arcade	13%	5%	6%	15%	5%	6%
Betting Shop	13%	44%	41%	8%	39%	36%
Bingo Hall	12%	1%	2%	12%	1%	2%
Casino	5%	7%	7%	5%	8%	8%
Internet	21%	13%	14%	16%	13%	13%
On Course	1%	2%	2%	1%	2%	2%
Pub / Club	3%	5%	5%	2%	4%	4%
Service Station	1%	1%	1%	1%	0%	0%
Telephone	0%	2%	2%	0%	2%	1%
Television	1%	0%	0%	2%	0%	1%
Other	30%	20%	21%	37%	27%	28%

Number of years clients had been gambling

Clients had been gambling for: n=	2009/10				2008/09			
	249	64	1256	1569	148	27	752	927
	GamCare	OnLine	Partners	All	GamCare	Online	Partners	All
Less than 5 years	27%	44%	30%	30%	24%	37%	31%	30%
6-10 years	20%	23%	18%	19%	24%	30%	22%	22%
11-15 years	12%	6%	16%	15%	15%	4%	15%	15%
16-20 years	14%	14%	14%	14%	14%	11%	15%	15%
Over 21 years	28%	13%	21%	22%	24%	19%	16%	18%

Debts disclosed by clients

Level of debt, where given	2009/10				2008/09			
	GamCare	OnLine	Partners	All	GamCare	Online	Partners	All
Responses of all clients								
Disclosed level of debt	72%	63%	78%	77%	81%	55%	77%	77%
None	15%	7%	11%	12%	16%	10%	10%	11%
Some	10%	17%	8%	8%	2%	15%	6%	6%
Not disclosed	2%	12%	3%	3%	2%	20%	7%	6%
n =	208	26	1302	1510	155	11	927	1093
Under 6K	35%	31%	44%	43%	35%	36%	39%	38%
6K-10K	15%	27%	15%	15%	15%	18%	18%	17%
11K-20K	20%	12%	17%	18%	19%	0%	18%	18%
21K-50K	17%	27%	16%	16%	13%	27%	15%	15%
51K-100K	5%	0%	5%	5%	7%	0%	6%	6%
100K and over	6%	0%	2%	3%	8%	0%	3%	4%
Bankruptcy	2%	4%	1%	1%	3%	9%	1%	1%
IVA	0%	0%	0%	0%	0%	9%	0%	0%

GAMBLING COMMISSION

Gambling, alcohol consumption, cigarette smoking and health:

Findings from the 2007 British Gambling Prevalence Survey

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Commissioned by the Gambling Commission

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1 Abstract

1.1 Previous research has shown a link between gambling, alcohol, and cigarette smoking. Co-occurrence of problem gambling with other behavioural and psychological disorders can exacerbate, or be exacerbated by, problem gambling. Using participant data from the 2007 British Gambling Prevalence Survey (BGPS) (n = 9003 adults aged 16 years and over), secondary analysis was carried out on the relationship between gambling and three particular areas of co-occurrence. These were general health status, cigarette smoking, and alcohol consumption. All analysis was age standardised to allow comparisons between groups after adjusting for the effects of any difference in their age distributions.

1.2 Results showed that:

- cigarette smokers were more likely than non-smokers to have gambled in both past week and past year
- smokers were over three times more likely than non-smokers to be a problem gambler
- alcohol consumption was significantly associated with having gambled in both past week and past year
- alcohol consumption as measured by the number of units drunk on their heaviest drinking day in the last week was significantly associated with problem gambling
- health status was not associated with either past week or past year gambling
- the prevalence rate of problem gambling among those with poor health were over three times as likely to be a problem gambler compared to those with good health. Implications of these results are discussed.

2 Introduction

2.1 Gambling has not been traditionally viewed as a public health matter (Korn, 2000; Griffiths, 2004). However, the social and health costs of problem gambling can be large on both individuals and society more generally. Personal costs can include irritability, extreme moodiness, problems with personal relationships (including divorce), absenteeism from work, family neglect, and bankruptcy (Griffiths, 2007). Problem gambling often occurs concurrently with other behavioural and psychological disorders, which can exacerbate, or be exacerbated by, problem gambling (Griffiths, 2007). Adult problem gamblers also have increased rates of attention-deficit hyperactivity disorder (ADHD), substance abuse or dependence, antisocial, narcissistic, and borderline personality disorders (American Psychiatric Association, 1994; Griffiths, 2007). There is also some evidence that cross-addictions may differ among demographic subgroups and gambling types (Griffiths, 1994a). For instance, young male slot machine gamblers are more likely to abuse solvents (Griffiths, 1994b).

2.2 Previous research has shown a link between gambling and alcohol, nicotine smoking and/or drug use. For example, alcohol can be used as a way of coping with depression and/or anxiety caused by gambling problems, and, conversely, alcohol may trigger gambling desire (Griffiths, Parke & Wood, 2002). Many studies have reported such links in both adults (eg Ramirez, McCormick, Russo & Taber, 1984; Ciarrocchi & Richardson, 1989; Lesieur, Blume & Zoppa, 1986) and adolescents (eg Griffiths & Sutherland, 1998; Wood, Gupta, Derevensky & Griffiths, 2004). More recently, Petry, Stinson and Grant (2005) reported that just under two-thirds of problem gamblers had a nicotine dependence (60%), approximately three-quarters had an alcohol use disorder (73%), and that just over a third had a drug use disorder (38%) el-Guebaly, Patten, Currie, et al (2006) examined psychiatric co-morbidities associated with problem gambling and reported that those with a substance use disorder were three times more likely to be problem gamblers.

- 2.3** Individuals with other disorders may also be prone to a wide variety of medical consequences including stress-related physical illnesses including insomnia, hypertension, heart disease, stomach problems (eg peptic ulcer disease) and migraine (Daghestani, Elenz & Crayton, 1996; Griffiths, Scarfe & Bellringer, 1999; Griffiths, 2004). Problem gambling may also result in health-related problems from withdrawal effects. For instance, Rosenthal and Lesieur (1992) found that at least 65% of problem gamblers reported at least one physical side-effect during withdrawal including insomnia, headaches, upset stomach, loss of appetite, physical weakness, heart racing, muscle aches, breathing difficulty and/or chills. When comparing the withdrawal effects with a substance-dependent control group, they concluded that problem gamblers experienced more physical withdrawal effects when attempting to stop than the control group.
- 2.4** There were no specific *a priori* hypotheses as secondary analysis was carried out post hoc. However, it was predicted there would be a positive correlation between gambling and alcohol consumption, gambling and cigarette smoking, and gambling and ill health (ie cigarette smokers and alcohol drinkers would be more likely to gamble than non-smokers and non-drinkers, and that those suffering ill health were more likely to gamble than those not in poor health). There were no predictions made about co-occurrence of smoking and drinking behaviours relating to individual forms of gambling.

3 Method

- 3.1** Data analysed in this study came from the second British Gambling Prevalence Survey (Wardle, Sproston, Orford, Erens, Griffiths, Constantine & Pigott, 2007), a survey commissioned and funded by the Gambling Commission, the British gambling regulator set up under the 2005 Gambling Act. The study was carried out by the National Centre for Social Research (NatCen) with the first and third authors as advisors. The method was similar to that used in the first national survey carried out in 1999 (Sproston, Erens & Orford, 2000). Using the Postcode Address File as the sampling frame, private addresses were randomly selected within 317 postcode sectors stratified by region, occupational status and proportion of non-white residents.
- 3.2** Fieldwork was carried out between September 2006 and March 2007 by NatCen's field force trained by NatCen researchers at 19 training sessions held across Britain. Following an advance letter, interviewers called at the selected addresses in order to complete a household interview with the 'household reference person' (HRP) or their spouse/partner (to collect socio-economic information about the HRP and demographic information about each person resident in the household) and to assign a copy of the main self-completion questionnaire for each person aged 16 and over living in the household. Completed questionnaires were either collected at the same visit or on a later occasion. An online completion option was made available and was taken up by 7% of respondents. HRP interviews were achieved at 63% of addresses, and questionnaires were completed by 81% of adults at those addresses. The overall response rate was 52% (n = 9,003). Further details are provided in the full report of the survey (Wardle et al, 2007).
- 3.3** From the data collected, secondary analysis was carried out on three particular areas using SPSS. These were general health status, cigarette smoking, and alcohol consumption. Results relating to these variables and problem gambling made use of the Diagnostic and Statistical Manual of the American Psychiatric Association (DSM-IV) criteria for problem gambling (American Psychiatric Association, 1994).

The DSM-IV consists of ten diagnostic criteria, and a diagnosis of pathological gambling is made if a person fulfils at least five of the criteria. In addition, a number of surveys have included a further category of 'problem gambler' for those who fulfil at least three of the DSM-IV criteria. The threshold used to identify 'problem gamblers' in the current survey was the same as that used in the 1999 survey (ie three or more represents a 'problem gambler'). This decision was made for the sake of clarity and simplicity, because the additional distinction was not seen as necessary for the purposes of this study, and because the number of respondents falling into the two categories was too small to analyse separately.

- 3.4** All significance testing on the data to be reported used an adjusted Wald's Test to model the differences taking into account the complex sample design, weighting and clustering. All p values in the next section and tables relate to this particular type of statistical testing. It should also be noted that all analysis was age standardised to allow comparisons between groups after adjusting for the effects of any difference in their age distributions. The data were standardised to the mid-year 2006 population estimates for Great Britain (Office for National Statistics, 2008).

4 Results

- 4.1 Gambling and health:** Poor health was defined by presence of a 'limiting longstanding illness' and/or self-reported poor health (whereas good health was simply self-report of being in good health). Results showed that health status was not significantly associated with past year gambling after age had been taken into account (see Table 1). Approximately two-thirds of those in good health (68%) and poor health (70%) had gambled in the past year. Further analysis was also carried out on health status and each individual gambling activity. As shown in Table 1, those in poor health were significantly more likely in the past year to have engaged in slot machine gambling, playing football pools, playing bingo, playing fixed odds betting terminals (FOBTs)¹, online betting, online gambling and private betting with other people. In relation to overall past week gambling, results showed that health status was not significantly associated with 43% of those in poor health having gambled in the past week compared to 41% of those in good health (see Table 2). Further analysis on individual past week gambling activities showed there were only three activities that were significantly more likely to be played by people with poor health (ie slot machine gambling, horse race gambling, and casino gambling) (see Table 2). Results demonstrated that being in poor health and/or having a limiting longstanding illness was significantly associated with problem gambling. Among those with poor health, the prevalence rate of problem gambling was 1.8% compared to a problem gambling prevalence rate of 0.5% for those who were not in poor health [$F(1, 158) = 15.39$; $p < 0.01$].

¹ Now Category B2 Gaming Machines.

Table 1 Participation in gambling activities in the past year by poor and good health

All	Poor health %	Good health %	Total %	F-value	p-value
Gambled in the past year	70	68	68	0.53	0.47
Problem gambling	1.8	0.5	0.9	15.39	0.01
National lottery	57	58	57	0.08	0.78
Other lottery	12	12	12	0.12	0.73
Scratch cards	22	20	20	1.81	0.18
Football pools	5	3	3	4.96	0.03
Bingo	11	7	7	13.80	0.00
Slot machines	18	14	15	5.44	0.02
Horse races	19	17	17	0.91	0.34
Dog races	5	5	5	0.00	0.98
Other betting	7	6	6	0.25	0.62
FOBTs	4	2	3	5.70	0.02
Online bookmakers	6	4	4	4.01	0.05
Online gambling	5	3	3	6.03	0.02
Casino	4	4	4	0.48	0.49
Betting exchange	2	1	1	1.38	0.24
Spread betting	1	1	1	3.87	0.05
Private betting	14	10	11	7.74	0.01
Bases (weighted)	1300	7542	8842		
Bases (unweighted)	1372	7480	8852		

Degrees of freedom: (1,158) for all cases. All data age standardised

Note: Poor health was defined by presence of a 'limiting longstanding illness' and/or self-reported poor health

Table 2 Participation in gambling activities in the past week by poor and good health

All	Poor health %	Good health %	Total %	F-value	p-value
Gambled in the past week	43	41	41	1.70	0.19
National lottery	33	34	33	0.19	0.66
Other lottery	4	3	3	1.09	0.30
Scratch cards	7	6	6	2.80	0.10
Football pools	3	2	2	3.09	0.08
Bingo	4	3	3	3.32	0.07
Slot machines	6	3	4	6.67	0.01
Horse races	4	2	3	6.66	0.01
Dog races	1	1	1	1.70	0.19
Other betting	1	1	1	0.00	0.96
FOBTs	1	1	1	2.24	0.14
Online bookmakers	0	1	1	2.17	0.14
Online gambling	1	1	1	0.07	0.80
Casino	2	0	1	7.81	0.01
Betting exchange	0	0	0	0.31	0.58
Private betting	3	3	3	0.96	0.33
Bases (weighted)	1304	7544	8848		
Bases (unweighted)	1372	7480	8852		

Degrees of freedom: (1,158) for all cases. All data age standardised

Note: Poor health was defined by presence of a 'limiting longstanding illness' and/or self-reported poor health

- 4.2 Smoking and gambling:** Analysis was carried out examining the relationship between those who smoked cigarettes and past year gambling activity. Almost four-fifths of smokers (79%) had gambled in the past year compared to almost two-thirds of non-smokers (65%), a finding that (after controlling for age) was significant (see Table 3). Analysis was also carried out on smoking and individual type of past year gambling. Results showed that in the past year, smokers were significantly more likely to have gambled on the National Lottery, scratchcards, bingo, slot machines, horse races, dog races, other types of betting with bookmakers, FOBTs, online gambling, casinos and private betting (see Table 3).

Table 3 Participation in gambling activities in the past year by cigarette smoking status

All	Current smoker %	Non-smoker %	Total %	F-value	p-value
Gambled in the last year	79	65	68	108.58	0.00
National lottery	67	54	57	80.75	0.00
Other lottery	12	12	12	0.03	0.87
Scratchcards	27	17	20	94.65	0.00
Football pools	4	3	3	1.91	0.17
Bingo	13	6	7	106.72	0.00
Slot machines	20	13	14	69.62	0.00
Horse races	20	16	17	12.49	0.00
Dog races	6	5	5	8.03	0.01
Other betting	8	6	6	11.70	0.00
FOBTs	4	2	3	14.24	0.00
Online bookmakers	5	4	4	2.46	0.12
Online gambling	4	2	2	12.81	0.00
Casino	5	4	4	4.26	0.04
Betting exchange	1	1	1	1.71	0.19
Spread betting	1	1	1	1.40	0.24
Private betting	14	9	10	29.46	0.00
Bases (weighted)	2071	6643	8714		
Bases (unweighted)	2036	6689	8725		

Degrees of freedom: (1,158) for all cases. All data age standardised

- 4.3** Analysis examining the relationship between cigarette smoking and past week gambling activity showed that just over half the smokers (51%) had gambled in the past week compared to almost two-fifths of non-smokers (38%), a finding that was significant (see Table 4). Results showed that in the past week, smokers were significantly more likely to have gambled on the National Lottery, scratchcards, bingo, slot machines, horse races, dog races, other types of betting with bookmakers, FOBTs, online gambling, casino gambling and private betting (see Table 4). Being a cigarette smoker was also significantly associated with problem gambling. Among smokers, the prevalence rate of problem gambling was 1.1% compared to a problem gambling prevalence rate of 0.4% among non-smokers [F (1, 158) = 11.38; p<0.001].

Table 4 Participation in gambling activities in the past week by cigarette smoking status

All	Current smoker %	Non-smoker %	Total %	F- value	p-value
Gambled in the past week	51	38	41	117.76	0.00
National lottery	40	32	34	50.71	0.00
Other lottery	3	3	3	0.29	0.59
Scratchcards	10	5	6	64.32	0.00
Football pools	2	2	2	1.63	0.20
Bingo	6	2	3	69.85	0.00
Slot machines	6	3	4	63.47	0.00
Horse races	4	2	3	19.65	0.00
Dog races	1	1	1	5.11	0.03
Other betting	2	1	1	13.38	0.00
FOBTs	1	1	1	9.83	0.00
Online bookmakers	1	1	1	0.63	0.43
Online gambling	2	1	1	19.84	0.00
Casino	1	0	1	6.68	0.01
Betting exchange	0	0	0	0.41	0.52
Spread betting	0	0	0	2.39	0.12
Private betting	4	2	3	23.29	0.00
Bases (weighted)	2071	6649	8720		
Bases (unweighted)	2035	6695	8730		

Degrees of freedom: (1,158) for all cases. All data age standardised

4.4 Alcohol consumption and gambling: After controlling for age, alcohol consumption was significantly associated with having gambled in the past year. The prevalence of gambling in the past year was highest among those who drank more than four times the recommended daily intake² of alcohol on their heaviest drinking day (see Table 5). Further analysis showed that drinking four times the daily recommended intake of alcohol on their heaviest drinking day was significantly associated with past year gambling on the football pools, slot machines, horse races, dog races, other types of betting with bookmakers, FOBTs, online bookmakers, online gambling, casino gambling, betting exchanges and private betting (see Table 5).

² The maximum recommended daily limit for alcohol is four units for men and three units for women.

Table 5 Participation in gambling activities in the past year by alcohol consumption on heaviest drinking day in the past seven days

All current consumers of alcohol	Does drink alcohol - but did not drink in last 7 days %	Drank 6 or less units (women) or 8 or less units (men) %	Drank 6 - 12 units (women) or 8 -16 units (men) %	Drank more than 12 units (women) or more than 16 units (men) %	Total	F-value	p-value
Gambled in the past year	70	70	75	81	72	3.34	0.02
National lottery	59	58	63	64	60	1.45	0.23
Other lottery	14	12	14	14	13	1.08	0.36
Scratchcards	21	19	22	24	20	2.56	0.06
Football pools	4	3	4	7	3	3.31	0.02
Bingo	8	7	10	9	8	1.61	0.19
Slot machines	17	15	19	22	16	5.98	0.00
Horse races	17	18	24	33	20	12.38	0.00
Dog races	5	5	8	10	6	9.08	0.00
Other betting	6	6	9	12	7	9.58	0.00
FOBTs	2	2	3	7	3	11.12	0.00
Online bookmakers	5	3	5	9	4	9.86	0.00
Online gambling	3	2	4	6	3	6.13	0.00
Casino	3	4	5	9	4	7.63	0.00
Betting exchange	1	1	1	2	1	2.65	0.05
Spread betting	1	1	1	1	1	0.96	0.41
Private betting	8	10	16	21	12	13.31	0.00
Bases (weighted)	694	3913	1266	458	6331		
Bases (unweighted)	705	4020	1233	420	6378		

Degrees of freedom: (3,158) for all cases

- 4.5** Alcohol consumption was also associated with having gambled in the past week. Those who drank more than four times the daily recommended intake of alcohol on their heaviest drinking day were significantly more likely to have gambled in the past week (see Table 6). In relation to individual gambling activities, drinking four times the daily recommended intake of alcohol on their heaviest drinking day was significantly associated with past week gambling on football pools, slot machines, horse races, dog races, other types of betting with bookmakers, online bookmakers, online gambling and private betting. Alcohol consumption as measured by the number of units drunk on their heaviest drinking day in the last week was significantly associated with problem gambling. Results showed that the prevalence rate for problem gambling was 0.2% for people who drank six or less units (women) and eight or less units (men) on their heaviest drinking day; 0.6% for people who drank 6-12 units (women) and 8-16 units (men) on their heaviest drinking day; and 2.3% for those people who drank more than 12 units (women) and more than 16 units (men) on their heaviest drinking day ($F[2,157] = 12.3$; $p < 0.001$).

Table 6 Participation in gambling activities in the past week, by alcohol consumption on heaviest drinking day in the past seven days

All current consumers of alcohol	Does drink alcohol - but did not drink in last 7 days %	Drank 6 or less units (women) or 8 or less units (men) %	Drank 6 - 12 units (women) or 8 -16 units (men) %	Drank more than 12 units (women) or more than 16 units (men) %	Total	F-value	p-value
Gambled in the past week	42	40	45	51	42	4.55	0.00
National lottery	34	33	37	37	35	1.47	0.22
Other lottery	4	3	4	3	3	0.39	0.76
Scratchcards	6	5	7	7	6	2.00	0.12
Football pools	2	2	3	5	2	2.77	0.04
Bingo	3	3	4	4	3	1.15	0.33
Slot machines	3	3	6	7	4	10.72	0.00
Horse races	3	2	3	6	3	8.50	0.00
Dog races	1	0	1	2	1	4.22	0.01
Other betting	1	1	2	2	1	4.36	0.01
FOBTs	1	1	1	2	1	1.28	0.28
Online bookmakers	1	1	2	1	1	3.27	0.02
Online gambling	1	1	1	3	1	4.22	0.01
Casino	0	0	1	1	0	1.27	0.29
Betting exchange	1	-	1	0	0	n/a	n/a
Spread betting	-	0	-	-	0	n/a	n/a
Private betting	2	2	4	6	3	5.38	0.00
Bases (weighted)	695	3915	1266	458	6334		
Bases (unweighted)	706	4022	1233	420	6381		

Degrees of freedom: (3,158) for all cases

5 Discussion

- 5.1 Findings of this study were broadly in line with the hypotheses made and supported previous research in the area that gambling (and more specifically problem gambling), cigarette smoking and alcohol consumption are co-occurring behaviours (eg Lesieur et al, 1986; Griffiths & Sutherland, 1998; el-Guebaly et al, 2006). More specifically, this study demonstrated that smokers were more likely to gamble in the past year and past week, a finding reported in other studies (eg Griffiths & Sutherland, 1998; Petry et al, 2005). It was also found that smokers were more likely to gamble on most forms of gambling in both the past year and past week. Given that there was an overall relationship between smokers and the amount of general gambling, it was perhaps unsurprising that smokers were more likely than non-smokers to gamble on most individual forms of gambling.

- 5.2** Excluding the activities that had a very low player base (eg spread betting, betting exchanges), the activities that showed no relationship with smoking tended to be the more discontinuous gambling activities such as playing on the football pools, playing other lotteries and using betting exchanges. Given that smoking cigarettes tends to be a somewhat habitual behaviour and classically conditioned (eg the smoking of a cigarette after eating, having a cigarette as soon as the person gets up in the morning), it may be that those gambling activities where there was no significant relationship were activities that occurred too infrequently for habitual or conditioned responses to be formed. Given the positive association between cigarette smoking and gambling, it was unsurprising that current smokers (1.4%) were over three times more likely than non-smokers (0.4%) to be a problem gambler, and again supports previous research (eg Petry et al, 2005).
- 5.3** As with cigarette use, alcohol consumption was also significantly associated with having gambled in the past week and past year. The prevalence of gambling in the past year was highest among those who drank more than four times the recommended daily intake of alcohol on their heaviest drinking day and also supports previous research showing such a link (eg Ramirez et al, 1984; Ciarrocchi & Richardson, 1989; Lesieur et al, 1986; Griffiths & Sutherland, 1998; Wood et al, 2004). Unlike cigarette use, the activities that alcohol consumption was not associated with (past week or year) were a disparate group including the National Lottery, bingo, scratchcards, casino gambling, betting exchanges and spread betting. There appears to be little in common with these very different types of gambling and there does not appear to be an obvious reason as to why there was no association with alcohol consumption. Almost identically to cigarette use, alcohol consumption (as measured by the number of units drunk on their heaviest drinking day in the last week) was significantly associated with problem gambling.
- 5.4** High levels of legal substance use, abuse and addiction among problem gamblers found in many other studies highlight the importance of screening for gambling problems among participants in alcohol (and other drug) treatment facilities, mental health centres and outpatient clinics, as well as probation services and prisons. Unfortunately, beyond programmes that provide specialised problem gambling services, few counselling professionals screen for gambling problems among their clients although there have been reports in the empirical literature where such screening has taken place in alcohol and drug treatment facilities (Griffiths 1994b; Orford, Boulay, Copello, Graves, Purser & Day, 2003). Even when a gambling problem is identified, non-specialist professionals are often uncertain about the appropriate referrals to make or what treatments to recommend (Abbott et al, 2004). There is clearly a need for education and training in the diagnosis, appropriate referral and effective treatment of gambling problems amongst the health professions more generally. The need for education and training in the diagnosis, appropriate referral and effective treatment of gambling problems must be addressed within general practitioner training (Griffiths, 2007).
- 5.5** Using the age standardised data, results showed that health status was not associated with either past year or past week gambling. However, there was a significant association between health and problem gamblers with the problem gambling rate being over three times higher among those in poor health compared to those in good health. This meant that the predicted hypothesis was only partially supported. Data by individual gambling activity over the past year showed some activities were significantly more likely to be played by those in poor health (ie football pools, online gambling, online betting, private betting, slot machines and bingo). Apart from slot machines and bingo, all the other gambling activities positively associated with poor health are ones that can be done from a person's home.

This makes intuitive sense as those with poor health are more likely than those in good health to spend more time in their home. Only three activities were significantly associated with poor health and past week gambling (ie slot machines, horse racing, casinos). These three activities all have the potential to be high event frequency activities that allow the person to engage in continuous gambling and the capacity to escape and/or dissociate (Griffiths, Wood, Parke & Parke, 2006; Wood & Griffiths, 2007). To a person in poor health, such activities may be cognitively distracting enough to alleviate pain and provide a reason for engaging in the behaviour. However, it should also be noted that prevalence rates for past week gambling on some activities were very low making any significant differences somewhat meaningless.

- 5.6** As already noted, among those with poor health, the prevalence rate of problem gambling was 1.8% compared to a problem gambling prevalence rate of 0.5% for those who were not in poor health. Such a finding is broadly in line with other studies that have found higher levels of problem gambling among those with a variety of health problems and/or psychiatric disorders (eg Kim, Grant, Eckert, et al, 2006; Zimmerman, Chelminski & Young, 2006; McIntyre, McElroy, Pope, et al, 2007; Kennedy, McIntyre, O'Donovan, et al, 2008). The question of whether these individuals are in poor health as a consequence of problem gambling, engage in gambling as a way of coping with poor health, or a combination of both, cannot be answered from the cross-sectional data presented in this study (Griffiths, 2004).
- 5.7** There are, despite the large sample size and good representation of the British population, a number of limitations of the data presented here. Perhaps, most importantly, is the self-report nature of the data. No validated measures (such as the General Health Questionnaire) were used to assess health, and all data relating to cigarette use and alcohol consumption were also self-report. Future studies may benefit from more accurate measures of health-related behaviour and/or corroboration from third party sources.
- 5.8** The introduction of the smoking bans may help decrease problem gambling given the co-relationship between the two behaviours although further research is needed to assess whether this will lead to any displacement effects, such as an increase in online gambling where smokers can gamble from the comfort of their own home.
- 5.9** To conclude, there is clear evidence from this and other studies that gambling is a potential health issue. It could therefore be argued that in the medical and health professions there needs to be a raised awareness about gambling-related problems and to develop effective strategies to prevent and treat problem gambling and co-occurring behaviours (Griffiths, 2007). The relatively rapid expansion of gambling opportunities over the last decade represents a potential public health concern, and medical/health practitioners also need to research the impact of gambling on vulnerable, at risk, and special populations (including those that use and misuse alcohol and nicotine).

References

- American Psychiatric Association (1994). *Diagnostic and statistical manual of mental disorders* (Fourth edition). Washington, DC: American Psychiatric Association.
- Ciarrocchi, J. & Richardson, R. (1989). Profile of compulsive gamblers in treatment : Update and comparisons. *Journal of Gambling Behavior*, 5, 53-65.
- Daghestani, A.N., Elenz, E. & Crayton, J.W. (1996) Pathological gambling in hospitalised substance abusing veterans. *Journal of Clinical Psychiatry*, 57, 360-3.
- el-Guebaly, N., Patten, S.B., Currie, S., Williams, J.V., Beck, C.A., Maxwell, C.J. & Wang, J.L. (2006). Epidemiological associations between gambling behaviour, substance use and mood and anxiety disorders. *Journal of Gambling Studies*, 22, 275-87.
- Griffiths, M.D. (1994a). An exploratory study of gambling cross addictions. *Journal of Gambling Studies*, 10, 371-384.
- Griffiths, M.D. (1994b). Co-existent fruit machine addiction and solvent abuse in adolescence: A cause for concern? *Journal of Adolescence*, 17, 491-498.
- Griffiths, M.D. (2004). Betting your life on it: Problem gambling has clear health related consequences. *British Medical Journal*, 329, 1055-1056.
- Griffiths, M.D. (2007). *Gambling Addiction and its Treatment Within the NHS*. London: British Medical Association.
- Griffiths, M.D., Parke, J. & Wood, R.T.A. (2002). Excessive gambling and substance abuse: Is there a relationship? *Journal of Substance Abuse*, 7, 187-190.
- Griffiths, M.D., Scarfe, A. & Bellringer, P. (1999). The UK National telephone Helpline - Results on the first year of operation. *Journal of Gambling Studies*, 15, 83-90.
- Griffiths, M.D. & Sutherland, I. (1998). Adolescent gambling and drug use. *Journal of Community and Applied Social Psychology*, 8, 423-427.
- Griffiths, M.D., Wood, R.T.A., Parke, J. & Parke, A. (2006). Dissociative states in problem gambling. In C. Allcock (Ed.). *Current Issues Related To Dissociation*. pp.27-37. Melbourne: Australian Gaming Council.
- Kennedy, S.H, McIntyre, R., O'Donovan, C., Milev, R., Melledo, J., Bisserbe, J. & Zimmerman, M. (2008). Frequency and Correlates of Gambling Problems in Depressed and Bipolar Outpatients. Final report to the Ontario Problem Gambling Research Council.
- Kim S.W., Grant J.E., Eckert E.D., Faris P.L. & Hartman B.K. (2006). Pathological gambling and mood disorders: clinical associations and treatment implications. *Journal of Affective Disorders*, 92, 109-116.
- Korn, D.A. (2000). Expansion of gambling in Canada: Implications for health and social policy. *Canadian Medical Association Journal*, 163(1), 61-64.
- Lesieur, H.R., Blume, S.B. & Zoppa, R.M. (1986). Alcoholism, drug abuse and gambling. *Alcoholism: Clinical and Experimental Research*, 10, 33-38.
- McIntyre, M., McElroy, S.L., Pope, H.G., Keck, P.E., Hudson, J.I., Phillips, K.A. & Strakowski, S.M. (1996). Are impulse-control disorders related to bipolar disorder? *Comprehensive Psychiatry*, 37, 229-40.

Office for National Statistics (2008). National statistics. Last accessed December 2, 2008: Available from: <http://www.statistics.gov.uk/statbase/Product.asp?vlnk=15106>

Orford, J., Boulay, S., Copello, A., Graves, N., Purser, B. and Day, E. (2003). Gambling and problem gambling among clients and staff attitudes in an alcohol and drug problems treatment service in the English Midlands. *International Gambling Studies*, 3, 171- 181.

Petry, N.M., Stinson, F.S. & Grant, B.F. (2005). Comorbidity of DSM-IV pathological gambling and other psychiatric disorders: results from the National Epidemiologic Survey on Alcohol and Related Conditions. *Journal of Clinical Psychiatry*, 66, 564–574.

Ramirez, L.F., McCormick, R.A., Russo, A.M. & Taber, J.I. (1984). Patterns of substance abuse in pathological gamblers undergoing treatment. *Addictive Behaviors*, 8, 425-428.

Rosenthal, R.J. & Lesieur, H.R. (1992) Self-reported withdrawal symptoms and pathological gambling. *American Journal of the Addictions*, 1, 150-4.

Sproston, K., Erens, B. & Orford, J. (2000). *Gambling Behaviour in Britain, Results from the British Gambling Prevalence Survey*. London: National Centre For Social Research.

Wardle, H., Sproston, K., Orford, J., Erens, B., Griffiths, M.D., Constantine, R. & Pigott, S. (2007). *The British Gambling Prevalence Survey 2007*. London: The Stationery Office.

Wood, R.T.A. & Griffiths, M.D. (2007). A qualitative investigation of problem gambling as an escape-based coping strategy. *Psychology and Psychotherapy: Theory, Research and Practice*, 80, 107-125.

Wood, R.T.A., Gupta, R., Derevensky, J. & Griffiths, M.D. (2004). Video game playing and gambling in adolescents: Common risk factors. *Journal of Child & Adolescent Substance Abuse* 14, 77-100.

Zimmerman, M., Chelminski, I. & Young, D. (2006). Prevalence and Diagnostic Correlates of DSM-IV Pathological Gambling in Psychiatric Outpatients. *Journal of Gambling Studies*, 22, 255-262.

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INFO 08/37

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To: Haringey Council Overview & Scrutiny Committee

From: [REDACTED], Independent Trader, High Road N17

Subject: Investigating the clustering of betting shops in Haringey

Date: 2nd November 2010

I am a partner in the family business "[REDACTED]" which has been trading in Tottenham High Road since before the war. We are adjacent to Betfred bookmakers which was previously The Plough public house. Unfortunately I did not oppose the granting of their licence as I was totally unaware at that time of the problems that this bookmaker could bring to the local area and our business.

In areas of high unemployment such as Tottenham, betting shops can attract a significant number of people who will hang around the premises for some considerable time during which large amounts of alcohol and, in some cases, drugs are consumed. Whilst it is illegal for people to drink alcohol inside a betting shop it is often allowed to happen. The anti social behaviour that occurs largely as a consequence of this has recently become intolerable.

During Betfred opening hours there are usually 6-12 people hanging around outside and their behaviour frequently descends into violence. Just last Friday, for example, the police had to be called when one person was dragged out of the betting shop and beaten up in broad daylight. This was mid afternoon in front of a busy bus stop which, it being half term, included young children.

Due to the lack of toilet facilities in Betfred (why?) the area immediately surrounding our own premises is frequently urinated upon, which as a food retailer I find particularly unacceptable.

It is high time that Bookmakers took their social obligations seriously and took some responsibility for the various problems that their businesses can bring to an area.

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Find Your Voice Pressure Group:

Health & Social impact of Betting Shops in Haringey

In September 2007, the Gambling Act came into force.

Since its passing, the effects of the Act have raised concerns for local authorities and communities throughout the UK. Issues such as the increase of people being treated for gambling addiction, and the inevitable cost to the NHS, as well as the saturation of betting shops in areas of deprivation and crime are a reality for local residents and businesses.

For the residents of the London Borough of Haringey, the Act has resulted in an explosion of betting shops in pocket areas, despite strong opposition. It is evident that Haringey Council, local residents and businesses' protests are being overlooked by a law that limits local authorities' powers to restrict the amount of betting shops opening in an area.

Find Your Voice Pressure Group

Find Your Voice Pressure Group (FYVPG) was created to spearhead a campaign to oppose the proliferation of betting shops in the London Borough of Haringey.

Planning Authority

In July 2010, FYVPG was delighted to hear that Haringey Council's Planning Department had denied planning permission to bookmaker, Paddy Power, to open a store on the premise of 261 High Road Tottenham.

In agreement with the London Borough of Haringey's decision, FYVPG is concerned with the idea of a betting shop opening on a prime corner site, for the following reasons:

- The premise is situated 15 metres from one of the main exits of the Seven Sisters London Underground Station;
- The real risk of deterring other potential commercial investment
- The proliferation of betting shops in the London Borough of Haringey decreases and replaces quality local small businesses that limit commercial choice for local residents;
- The negative impression a betting shop will have situated on a prime site on the area overall.
- The site is in close proximity to a private nursery, Earlsmead primary school, North East London College, estates covering Sevens Sisters and South Tottenham areas Tottenham PCT Mental Health Trust, Gladesmore School in South Tottenham/Stamford Hill and schools in surrounding areas.

Since learning of Paddy Power's intention, FYVPG has galvanised support from:

- Residents
- Business Associates
- Residents Associations
- Community groups

Since the London Borough of Haringey's announcement, Paddy Power has appealed against the decision and the Planning Inspectorate is presently reviewing the case.

Reasons for concerns

William Hill chief executive has championed the benefits of betting shops in Haringey, citing the opportunity of employment and that they provide a legal platform for an activity that would otherwise be illegal.¹

In response, FYVPG counteracts this argument due to:

- The limited diverse commercial investment in the London Borough of Haringey. At present there are

¹ Haringey Independent, "William Hill boss says betting shops brings benefits to Haringey", Elizabeth Pears, 15 October 2010

71 betting shops in the borough, with ten of these clustered in the areas Northumberland Park, Bruce, Seven Sisters & West Green wards.

- The London Borough of Haringey is ranked 18th as the most deprived authority in England and the 5th most deprived authority in London. It is common knowledge that with high unemployment there is plausible risk of increase of crime and anti social behaviour;
- The Income Deprivation Affecting Children Index 2007, states that the London Borough of Haringey has the fifth highest level of child poverty;
- Disadvantaged groups, such as those that are unemployed or on welfare benefits are most likely to suffer the adverse effects of problem gambling. The association between problem gambling and disadvantaged groups is clearly evidences, as those on the lowest income are three times more likely to suffer from addiction ²*Research on the Social Impacts of Gambling, Scottish Executive Social Research, 2006.*
- The proposed shortfall of £60 million to the London Borough of Haringey's budget, due to potential cuts, applies additional pressure in providing a sufficient service to gambling addicts requiring treatment to overcome their addiction;
- It is estimated that local businesses lose £300 million in revenue due to the gambling industry. ³*Morse Report 2007*
- There is also evidence to support that gambling impacts on works performance, stolen time from work through unexplained or unsanctioned absences. ⁴*Manchester University Gambling and Debt Pathfinder Study 2009*
- It is estimated that 127,500 young people aged under 24 have a gambling problem in the UK. Gamcare recent reports that 2% of the 35,000 of calls received to its helpline in 2009/10 were from under 18s, with an increase of 22% from those aged 18-25. Most of the 'under 18s' who called Gamcare's confidential helpline reported gambling in 'arcades' and 'betting shops.'
- The rate of problem gambling is over three times as high in your people as it is in adults ⁵*Journal of Child Adolescent Substance Abuse, 8, 55-68.*
- Evidence suggest that the highest prevalence of problem betting would appear to occur in relatively new forms of betting activities Fixed Odds Betting (FOTB). ⁶*Preventing UK Gambling Harm, Responsibility in Gambling Trust, 2007.*
- Fixed Odds Betting Terminals (FOBT) have contributed to significant loss to gamblers estimated at £10bn per annum. ⁷*Guardians September 2007 Report: 'Cost of UK's Gambling Habit'*
- The average percentage of young people Not in Education, Employment or Training (NEETS) in Bruce Grove, Noel Park and White Hart Lane (Tottenham) is 8%, with the highest NEETS rate is 8.8%. ⁸*Haringey Children and Young People's Plan 2009.*
- Meropolitan Police figures for 2007/2008 reported 735 incidents of criminal damage occurred in Haringey's betting shops, as well as drug related and public order offences. In view of the
- The guardian article of 14th 2010 addressed the issue of disadvantage groups, which identifies black men who are disproportionately represented in prisons in England
- ⁹Guardian article of 14th October refers to the [Equality](#) and Human Rights Commission report *How Fair is Britain?* Which and Wales, equating to almost 7 times more likely to be imprisoned their share of the population, compared to 4 times the American population. The report highlights to state that three quarters of ex-prisoners re-offend and highlights the need to address issues of school exclusions, mental health and substance abuse It is not difficult to surmise the also consider the social costs to the courts (Including bankruptcy) police, probation services local authority and health

² Research on the Social Impacts of Gambling, Scottish Executive Social Research, 2006

³ Morse Report 2007

⁴ Manchester University Gambling and Debt Pathfinder Study 2009

⁵ Journal of Child Adolescent Substance Abuse, 8, 55-68.

⁶ Preventing UK Gambling Harm, Responsibility in Gambling Trust, 2007

⁷ Guardians September 2007 Report: 'Cost of UK's Gambling Habit'

⁸ Haringey Children and Young People's Plan 2009

⁹ Guardian article of 14th October refers to the [Equality](#) and Human Rights Commission report *How Fair is Britain*

services in a time of recession that affects all communities.

Nationwide Statistics

- In 2009 the estimated spend on gambling was £7.8bn or around 1% of GDP (the value of all goods and services)¹⁰;
- The NHS has estimated that there may be as many 350,000 people identified as problem gamblers in the UK¹¹.

Conclusion

Despite the gaming sector's arguments that betting shops present increase of employment and financial investment in deprived areas, their impact on the local community is a far outcry for those who are faced to deal with their realities.

FYVPG's campaign is not a moral crusade and the group respects individuals' choices, however the proliferation of betting shops in deprived areas with health inequalities and social deprivation is a real problem that FYVPG is deeply concerned with.

We question the assertion of increased crime and gambling being driven underground through lack of betting shops facilities. The Licensing authority is tasked with approving gambling licenses for other business premises i.e. clubs which addresses this need. The Licensing Authority in conjunction with Safer Neighbourhoods also the powers to close down illegal venues. Clubs which have gambling licenses also required to ensure that there is adequate security to deal with social disorder and to meet these costs. It reasonable that the Local Authority has the discretion to ensure the health and safety of residents pertaining to all licensed premises, as it could be perceived as unfair competition for other licensed establishments.

It is entirely appropriate for personal well being and social objectives to be material considerations to achieve outcomes which enable social, environmental and economic objectives to be effected together.

The saturation of Betting shops poises an increased high risk of addiction and with the potential cuts to the London Borough of Haringey's budget, it is reasonable to question how the council will provide adequate treatment for those who need it the most.

In addition, the stated evidence that highlights the increase of young people with problem gambling is alarming considering the recent application for a premises license

FYVPG would like to see the recent premises license for 261 High Road, revoked, and would like to request that Haringey seek immediate amendments to the Gambling Bill.

In accordance with the new Government's focus on localism, the opposition of the local community in objecting to the granting of gambling licenses should be a major consideration. In view of the risk to children, adolescents and vulnerable members of the community, FYVPG would like to see the Overview & Scrutiny Committee report widened to address these vulnerable communities.

With 71 betting shops in the borough and 10 within Tottenham, the awarding of the planning appeal would set a regrettable precedent.

On behalf of

Find Your Voice Pressure Group

¹⁰ In 2009 the estimated spend on gambling was £7.8bn or around 1% of GDP (the value of all goods and services

¹¹ The NHS has estimated that there may be as many 350,000 people identified as problem gamblers in the UK

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HARINGEY COUNCIL

OVERVIEW AND SCRUTINY COMMITTEE

INVESTIGATION OF BETTING SHOP CLUSTERING

**A WHISTLE BLOWER'S GUIDE FROM HARINGEY RESIDENT AND GAMBLING
INDUSTRY EXPERT DEREK WEBB OF PRIME TABLE GAMES**

Introduction

The purpose of this document is to provide a professional insight into why so many betting shops are opening in the borough of Haringey. The insight comes from a Haringey resident, successful gambler and businessman Derek Webb of Prime Table Games. Webb is the inventor of Three Card Poker, a game that has been played on the betting shop machines in various bookmakers. Webb and Prime Table Games are in no way anti-gambling, but are leading voices in the campaign to make gambling fairer.

Thoughts on why there are so many betting shops in Haringey

The ratio of betting shops per head of population in the UK is several times higher in urban areas, like Haringey, than in rural areas. We (Prime Table Games) think it is a safe assumption that the bookmakers target certain demographics when deciding where to open new shops, and that it therefore follows that they believe that the residents of Haringey are a particularly good demographic target. With a responsibility to protect the interest of its residents, the Council may be very interested to learn whether the bookmakers have evidence (anecdotal or empirical) that the social and cultural make-up of Haringey makes the area's population particularly attractive to the betting industry.

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Further, we believe the answer to the question as to why Haringey has so many betting shops may actually be even more straight-forward than demographic targeting, and be indicative of a wider problem surrounding a lack of effective legislation in the UK. The gaming regulations permit a maximum of four betting machines per shop and, based on the bookmakers annual accounts, these machines provide the betting shops with around half of their revenue. It is our assertion that the bookmakers are just maximising profits by having more machines – albeit in multiple locations in close proximity. During their representations at the review, it would be interesting to know whether the bookmakers agree that it is these machines and the revenue they generate, combined with the limit on number of machines per premises, that is driving the growth in numbers of Haringey betting shops.

Thoughts on whether Haringey betting shops are operating ‘fair and open’ gambling

UK gambling regulation incorporates the licensing objectives of socially responsible gambling and fair and open gambling. Yet despite the fact that the betting shops are open less than half the time that Las Vegas Strip casinos are, a betting shop machine in Haringey takes as much from players per day as a Las Vegas Strip casino slot machine. Our opinion is that this phenomenon is due to the Haringey betting shop machines being played for twice as long and/or for stakes twice as high as Las Vegas Strip casino slots, due to more addictive content.

Sadly it is also our opinion that the Haringey betting shop machine gambler is more prone to addiction than the Las Vegas Strip casino visitor. Given that the people of Haringey are feeding the bookmaker’s machines as much as the Las Vegas gamblers, in only half the time frame, it would be interesting to know whether the bookmakers can provide an alternative explanation to highly addictive content. Further, if the Haringey residents are targeted specifically for a propensity to become addicted, it would be interesting to hear whether the bookmakers believe that it is fair or socially responsible to continue to operate so many machines in the borough.

Looking at content specifically, betting shop machines feature games that are played at casino tables around the world – such as Roulette, Blackjack and Three Card Poker. The pace of these games is around three times faster when played on betting shop machines, and the rules of some versions

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played in the bookmakers are not as generous to players as the rules on the casino tables. This results in players losing either three times more or three times faster on these games on betting shop machines than on casino tables. Our opinion is that having casino table game content on betting shop machines that looks like the real games, but then allowing the games to be turbo-charged to win or lose three times faster than the real games is not fair to players. We would like to know why bookmakers are not forced to make it clear that players have a far more negative experience using casino games on betting shop machines than playing the same games on casino tables.

It is also noteworthy that in casino table games the average amount a player loses compared to the funds used is around 15%. The betting shop industry does not make public this ratio for betting shop machines, but informed analysis from Prime Table Games estimates it to be over 50%. In line with the gambling regulation's demand for gambling to be open, it will be useful to hear if the bookmaker's representatives can justify keeping this percentage secret.

More questions that need answering to help understand the impact of these machines

- What is the average total amount of numbers per spin that players bet on at roulette on a betting shop machine?
 - We believe the more numbers people bet on the more likely they are to be a problem gambler as they have lost focus and just 'need' to win

- What is the overall percentage of player funds paid into the betting shop machines that is actually retained by the machines
 - We estimate this to be around 50%

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- What percentage of a machine's business is completed in each quarter of the working day (3 hour intervals based on a 12 hour day), and how does that compare to over-the-counter activity during the same periods?
 - We believe that high levels of machine activity relative to over-the-counter activity may be indicative of machine addiction

- What percentage of betting shop machine wins are on each of the following games?
 - Roulette (which we believe has the most addictive content)
 - Blackjack
 - Three Card Poker
 - Any other game played as casino table game identified by game

More Information on Derek Webb and Prime Table Games

Derek Webb of Prime Table Games created the game Three Card Poker, and owns the UK rights to the game. Three Card Poker is approved in the UK as a casino table game and Prime Table Games is recognised as the game proprietor. Three Card Poker has been used on betting shop machines and on the internet without our permission.

In a player survey over 80% of UK players who responded agreed that they would be concerned if internet casinos used an invented game without the inventor permission. We regard the behavior of gambling operators engaged in this practice (on the internet or in betting shop machines) as socially irresponsible, deceptive, immoral and unethical. We have paid for advertisements in relevant trade

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publications, stating that we will not enter into any business relationship with the betting shop machine industry.

We are experts in understanding gambling game content. We own over 30 granted US patents related to original gambling games. We have prevailed in complex US Federal litigation related to gambling games, intellectual property and anti-trust issues.

We have funded a campaign www.fairergambling.org to generate action against betting shop machines. We regard the Roulette content on these machines as particularly addictive and damaging to communities such as Haringey.

For more information please visit www.fairergambling.org, or contact Kirsty Roberts through PrimeTableGames@bcspr.co.uk or 0115 948 6901

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From: [REDACTED]

Sent: 22 October 2010 13:35

To: Scrutiny

Subject: 10 November 2010 meeting - Betting Shops issue

I am strongly opposed to the growing number of betting shops being set up in our borough. Gambling is an addiction and not a demand. To say that not feeding this demand would drive it underground is like saying not keeping crack dens open would drive crack addicts to operate on the street. Underground gambling would be a crime and would be dealt with as such. It is a pity that the recent government has decided to start a national lottery (thus condoning gambling and compounding the problem - almost making it into a family passtime) under the guise of helping charity. Gambling is traditionally run by cartels of gangsters making very tidy profits whilst preying on the vulnerable and less educated factions of society offering unfair odds. The small number of employees hired by the gambling shops is irrelevant when taking into consideration the high number of clients frequenting their premises who are spending their unemployment benefit/incapacity benefit/DLA in the vain hope that it will gain them a better life instead of taking that money home to support their families. Demands are often created by those with commercial interests, it doesn't necessarily follow that if the supply was not on every street corner the demand would be as high as it is.

Let's not dress it up in a suit and try to make it look respectable. Gambling is exploitation and needs to be stamped out in order for our community to become healthy and productive again. Failing this it should be responsibly regulated so that the "odd flutter" does not mean someone spending all their worldly goods on pipe dreams, much to the delight of the greedy betting shop owners and interested council members.

Yours faithfully

[REDACTED] (Haringey resident)

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