

Appendix B

CONSULTATION IN RELATION TO HARINGEY'S DRAFT STATEMENT OF GAMBLING POLICY

Responses received from Consultees (Organisations/Bodies)	Comments made by the Consultees	What Haringey's Draft Statement says	Changes required / or not
The Salvation Army	We would urge you to measure each aspect against the yardstick of protection for those most susceptible to developing gambling problems. As the Act does not ban children from gambling on Category D machines, we would request that applicants are made to demonstrate appropriate measures in preventing, monitoring and challenging underage gambling and that this is evidenced by building design, location signage. staffing levels and working practices. We would express our concern that gambling premises not be located within or in close proximity to activities aimed at children or young people, this would include cinema complexes leisure centres and the like.	<p>Page 14 – states steps the Council would consider taking into account all of these matters as mentioned.</p> <p>Location- pg 12. It is acceptable for the LA to have a policy as regards certain premises not being suitable for certain areas. This is also referred to in the Gambling Commissions Guidance. There would need to be an opportunity given to any applicants to demonstrate that this policy should not be applied to his/her case, this will ensure the policy is not rigid.</p>	<p><u>No change required to Policy.</u></p> <p><u>No change required to Policy.</u></p>

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<p>Gam Care – National Association for gambling Care, Educational Resources and Training</p>	<p>All local authorities have a duty of care and become "Corporate Parents" Gambling is a hidden form of addiction with little recognition. A list of inclusion for either the policy or as part of the licensing conditions.</p> <ol style="list-style-type: none"> 1. The sale and distribution of controlled and the laundering of the proceeds of drugs to support gambling. 2. Prostitution to feed gambling needs. 3. Any unlawful gaming gambling and betting 4. The sale and distribution of controlled and the laundering of the proceeds of drugs to support gambling. 	<p>The Act seeks to ensure that help is available for those with a gambling addiction. How this information is disseminated to patrons within a premises will no doubt be clarified by the applicant in the application form on a case by case basis.</p>	<p><u>No change required to Policy.</u></p>

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	<p>5. The sale and distribution of controlled and the laundering of the proceeds of drugs to support gambling.</p> <p>6. Prostitution to feed gambling needs.</p> <p>7. Any unlawful gaming gambling and betting</p> <p>8. The sale and distribution of controlled and the laundering of the proceeds of drugs to support gambling.</p> <p>9. Prostitution to feed gambling needs.</p> <p>10. All leaflets giving assistance to problem gaming clearly displayed in prominent and areas such as toilets for example where they will be more discreet. This will give certain anonymity.</p> <p>11. Self exclusion forms available</p> <p>12. Operator must have a regard to best practice issued by organisations that represent the interest of vulnerable people.</p> <p>13. On machines such as FOBTs, the odds clearly displayed.</p> <p>14. All A.T.M. or cash terminals to be separate from gaming machines, so that clients will</p>	<p>All these matters are in the Policy</p>	

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	<p>have to leave the machine for more funds if so required. They should also display stickers with GamCare Helpline information positioned prominently on machine.</p> <p>15. Social responsibility must be adhered to and mentioned at all times when reasonable.</p> <p>16. It has been mentioned in the statement however it is so important clear visible signs of age restrictions are clearly displayed in gaming or betting establishments, also entrance s to gambling and betting areas as well as supervised and age identification verified.</p> <p>17. Posters displayed suggesting 'stat in control of your gambling' with details of GamCare telephone number and website.</p> <p>18. Please ensure that fruit machines are not situated in Mini Cab offices or takeaways or other unlicensed premises where children may have access to them.</p>		<p><u>No change required to Policy.</u></p> <p>Fruit machines in minicab offices: this borough already has a nil resolution on this. The Government has now seen fit to make it law across the country. We have produced and distributed separate literature advising of this.</p>

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British Beer and Pub Association	Minimum age requirements compliance should be by recognised ID such as a PASS accredited proof of age card, driving licence or passport where there is doubt that the player is 18 years of age or over.	This can be offered up by applicant at point of application.	The Child Protection Nominee (RA) will no doubt make request for this if he/she feels it is not addressed adequately in the application. This maybe by way of stating a recognised proof of age scheme.
	<p>For more than 2 machines. We would also like a generic form, for such permits.</p> <p>Transitional arrangements –</p> <p>Transitional arrangements to be mentioned in Policy or separate guidance to alcohol licensed premises in relation to the existing number of gaming machines. This is an automatic right and is not subject to approval from the Licensing Authority.</p>	<p>Cannot promote this approach, this should be on a case by case basis.</p> <p>There is a generic form. We can provide the procedure under a separate guidance note.</p>	<p>No change to Policy</p> <p>Separate guidance will cover this, it does not need to be in policy.</p>
Grosschalks solicitors Representing the Association of Book Makers	<p>Door Supervisors –</p> <p>They have never been operationally required; we would specifically ask that the policy reflects this by stating</p>	The licensing authority does have the ability under section 169 of the Act to impose licence conditions. These could include a requirement for door supervision as provided for	Can remain in Policy it is a consideration that will be there for Members if they see fit to impose a door supervisor condition

		in section 178. If a person employed on door supervision would be required to hold a licence issued by the SIA, that requirement will have force as though it were a condition on the premises licence . An exemption to this requirement is granted to holders of casino and and bingo premises licences under the Private Security Industry Act 2001.	
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	<p><i>there is no evidence that the operation of betting offices has required door supervisors. For the protection of the public. The Authority will make a door supervision requirement only if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and that door supervision is both necessary and proportionate.</i></p> <p>Betting Machines –</p> <p>These are machines on the shop floor of the betting office which customers can place a bet without having to visit</p>	<p>The proposed amendments as regards</p>	

	<p>the counter, and should not be confused with fixed odds betting terminals – Category B2 gaming machines, or amusement with prize machines. One may place a bet in an adult only environment, it is suggested that the policy states; <i>While the authority has discretion as to the number, nature and circumstances of use of betting machines, there is no evidence that such machines give rise to regulatory concerns. This Authority will consider limiting the number of machines only where there is clear</i></p>	<p>the licensing objectives is not necessary as it does not form a part of the key decision making process. The consideration of whether the staff can monitor the machine may well be a consideration. I feel we do not need to alter this. (pg 18).</p>	<p>No change to policy required</p>
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	<p><i>evidence that such machines have been or are likely to be used in breach of the licensing objectives. Where there is such evidence, this Authority may consider, when reviewing the Licence, the ability of staff to monitor the use of such machines from the counter.</i></p> <p>Re-site Applications –</p> <p>It is hoped that the Licensing Authority will wish to endorse and support this natural progress and improvement to the industry. It is requested that the policy positively encourages or at least state that the Authority will give sympathetic consideration to, re-sites</p>	<p>Cannot promote this as it does not necessarily relate to the licensing objectives.</p>	

	<p>within the same locality and extensions in order to enhance the quality of a facility provided for the benefit of the betting public.</p> <p>Enforcement</p> <p>The policy should include the following lines;</p> <p><i>'The Authority recognises that certain bookmakers have a number of premises within an area. In order to ensure that any compliance issues are</i></p>		
		This does not need to go into the policy.	
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	<p><i>Recognised and resolved at the earliest stage, operators are requested to give the Authority a single named point of contact, who should be a senior individual, and whom the Authority will contact first should any compliance queries or issues arise'.</i></p> <p>Application for Premises Licences –</p> <p>Delete reference from page 12 that application must be accompanied by assessment that demonstrates how the applicant will promote all the licensing objectives in the form of a written operating schedule. This is not stated in the Gambling Act 2005.</p>	<p>This can be removed, it had been inserted but was meant to be in relation to an application for applicants wanting to apply for a family gaming centre. Applicants for Gaming licences are not required to complete an Operating Schedule as with the</p>	<p>This is an operational matter and can be offered up in the application submitted not required to go into the policy.</p> <p>An operating schedule is not part of the process required under the Gambling Act 2005. A copy of the application forms issued by Government are available to view.</p>

	<p>Page 13 –</p> <p>In determining applications the Council <i>'will particularly take into account'</i>, such matters should only be an issue if a valid representation has been made. This is beyond the Council's duty and is not <i>'aiming to permit'</i>.</p>	<p>Licensing Act 2003.</p> <p>This wording has been altered to:</p> <p>This Authority will consider how best to ensure and will take reasonable steps to ensure that.. <i>throughout the document</i></p> <p>.....</p>	
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	<p>Door Supervisors</p> <p>Page 16 – redraft to widen the scope of persons eligible to work as door supervisors at exempt premises – not just SIA trained personnel.</p>	<p>Redrafted to clarify that options are open. Pg16</p>	
<p>Anna Thomas Define Insight Community Group</p>	<p>No more gambling or betting shops in this Borough. This is an abuse of poverty and distress, the Council should not licence them preying in areas where people are desperate.</p>	<p>Cannot be considered – oversupply is not a valid reason.</p>	

<p>Robert Edmonds Age Concern Haringey</p>	<p>Mention of the Council's definition of vulnerable adult(to include the word AGE) throughout the document would be useful.</p> <p>Anti Poverty working Group? Where does this come from?</p> <p>Working alongside HAVCO, Age concern to inform trustees of their responsibilities in terms of licensing and to enable them to agree to a voluntary code of practice providing signposting to local or national addition support organisation. Age concern Turkish elders Project has now ceased.</p> <p>Haringey forum for Older People were omitted from consultation list.</p>	<p>Not required it is not stated in the Act.</p> <p>Being put together by Social Services</p> <p>We can supply contact details of GamCare and any literature directly to these groups.</p> <p>Now added for future use</p>	<p>No alteration to policy</p>
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