

Report authorised by: Robin Payne.....



Assistant Director Enforcement Services

Contact Officer: Ms Daliah Barrett

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3. Executive summary

For consideration by Sub Committee under the Gambling Act 2005 for a Betting Premises Licence.

4. Access to information:

Local Government (Access to Information) Act 1985

Background Papers

The following Background Papers are used in the preparation of this Report:

File: JENNINGS

The Background Papers are located at Enforcement Service, Technopark, Ashley Road, Tottenham N17

5. REPORT

Background

5.1 Application by JENNINGS BET for a Premises Licence in respect of 144 High Road, Wood Green London N22 under the Gambling Act 2005. The application has followed the prescribed format and all consultations have been undertaken.
App 1

5.2 Members are reminded of the three licensing objectives under the Gambling Act 2005 which are:

- (a) preventing gambling from becoming 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.

5.3 When determining an application the Licensing Authority 'shall aim to permit the use for gambling (Section 153) subject to:

- Section 24 Codes of Practice
- Section 25 Guidance by the Gambling Commission
- Licensing objectives
- Haringey Council Licensing Policy

5.4 The Committee are asked to consider the application in light of the representation received from a body representing residents and William Hill. Members are guided to part 2 above 'Principles to be applied' copies of the relevant codes of practice are attached with this report. (App 2- Codes of Practice)

5.5 There are also two statutory disregards, it is expressly provided that In determining whether to grant a premises license, a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide. The licensing authority shall not have regard to whether the proposal is likely to receive planning or building regulations approval.

6. RELEVANT REPRESENTATIONS (CONSULTATION)

Responsible Authorities:

6.1 The Licensing Authority

No Comments received in relation to this application.

6.2 The Gambling Commission

A confirmation of receipt of the application has been given by the Commission

6.3 London Fire and Civil Defence Authority

No comments received in relation to this application

6.4 The Planning Department

No comment received in relation to this application

6.5 Environmental Health - Health and Safety/Noise Team/Pollution

No comments received in relation to this application

6.6 Trading Standards

Have no objections to this application

6.7 Safeguarding children nominee

No comments in relation to this matter.

6.8 Her Majesty's Commissioners of Custom and Excise

Have received notification of the application

6.9 Interested Parties - App 3

For the purposes of this part a person is an interested party in relation to a premises licence or in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the license or to who the application 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)

Representations have been made by residents (a & c) and William Hill which falls into (b) business interests that might be affected by the authorised activities.

7.0 Financial Comments

The fee which would be applicable for this application is **£2700.00**

8.0 Licensing Officer comments

There are three types of conditions which may be attached to a Premises Licence.

- Mandatory (S167)
- Default (S168)
- Discretionary, set by the Licensing Authority (S169)

Mandatory and default conditions are prescribed in the Gambling Act 2005 Regulations for each premises type. Conditions attached by the Licensing Authority may not;

Conflict with Gambling Commission requirements (S169)
Require memberships (S170)
Limit stakes or prizes (S171)
Restrict machines numbers (S172)

The Conditions Regulations stipulate the mandatory and default conditions every Premises License will have the following conditions:

Mandatory conditions attaching to every premises license

(1) The conditions specified in paragraphs (2), (3) and (4) shall be attached to every premises license.

(2) The summary of the terms and conditions of the premises license issued under section 164(1)(c) of the 2005 Act shall be displayed in a prominent place within the premises.

(3) The layout of the premises shall be maintained in accordance with the plan.

(4) The premises shall not be used for—

- (a) the sale of tickets in a private lottery or customer lottery, or
- (b) the sale of tickets in any other lottery in respect of which the sale of tickets on the premises is otherwise prohibited.

Mandatory conditions attaching to betting premises licenses

1. A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.
- 2.—(1) Access to the premises shall be from a street or from other premises with a betting premises license.
(2) Without prejudice to sub-paragraph (1), there shall be no means of direct access between the premises and other premises used for the retail sale of merchandise or services.
3. Subject to anything permitted by virtue of the 2005 Act, or done in accordance with paragraphs 4, 5, 6 and 7 below, the premises shall not be used for any purpose other than for providing facilities for betting.
4. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to leave any gaming machine or betting machine in order to do so.
5. No apparatus for making information or other material available in the form of sounds or visual images may be used on the premises, except for apparatus used for the following purposes—
 - (a) communicating information about, or coverage of, sporting events, including—
 - (i) information relating to betting on such an event; and
 - (ii) any other matter or information, including an advertisement, which is incidental to such an event;
 - (b) communicating information relating to betting on any event (including the result of the event) in connection with which betting transactions may be or have been effected on the premises.
6. No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.
7. No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with paragraph 5.
- 8.—(1) No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.
(2) A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.
9. A notice setting out the terms on which customers are invited to bet on the premises shall be displayed in a prominent place on the premises to which customers have unrestricted access.

Section 183 Christmas Day

A premises licence shall, by virtue of this section, be subject to the condition that the premises shall not be used to provide facilities for gambling on Christmas Day.

Section 184 Annual Fee

- (1) The holder of a premises licence-
- a. Shall pay a first annual fee to the licensing authority within such period after the issue of the licence as may be prescribed, and
 - b. Shall pay an annual fee to the licensing authority before each anniversary of the issue of the licence.

Section 185 Availability of licence

- (1) The holder of a premises licence shall-
- a. Keep the licence on the premises, and
 - b. Arrange for the licence to be made available on request to-
 - i. A constable
 - ii. An enforcement officer, or
 - iii. An authorised local authority officer

The Default conditions to be attached to any premises license unless they are excluded by the Licensing Authority, these are:

Default conditions attaching to betting premises licenses (other than in respect of tracks)

- No facilities for gambling shall be provided on the premises between the hours of 10pm on one day and 7am on the next day.

Section 169 of the Act gives licensing authorities:

- The ability to exclude from premises licenses any default conditions that have been imposed under section 168; and
- The power to impose conditions on the premises licenses that they issue.

Door Supervisors.

This is not a mandatory requirement.

Section 178 Door Supervision

- (1) Where a condition for door supervision is attached to a premises licence (whether by virtue of section 167, 168 or 169) subsection (3) shall apply in relation to the licence.
- (2) In subsection (1) "condition for door supervision" means a condition requiring that one or more persons be responsible for guarding the premises against unauthorised access or occupation, against outbreaks or disorder or against damage.
- (3) If the person carrying out the guarding mentioned in subsection (2) is required by the Private Security Industry Act 2001 (c. 12) to hold a licence under that Act authorising the guarding, the requirements under that Act shall be treated for the purpose of this Act as if it were a condition of the premises licence attached by virtue of this section.

APPENDIX 1

APPLICATION FORM

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual Applicant

1 Title: Mr Mrs Miss Ms Dr Other (please specify)

2 Surname: [*****] Other name(s):

3 Applicant's address (home or business -):

[*****]

[*****]

[*****]

[*****]

Postcode: [*****]

4(a) The number of the applicant's operating licence (as set out in the operating licence): [*****]

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [*****]

5 Tick the box if the application is being made by more than one person.

Section B

Application on Behalf of an organisation

6 Name of applicant business or organisation: Jennings Racing (2006) Limited

7. The applicant's registered or principal address:

4 Simon Champion Court

232-234 High Street

Epping

Postcode: CM16 4AU

8(a) The number of the applicant's operating licence (as given in the operating licence):

075-002341-N-103412-001

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [*****]

9 Tick the box if the application is being made by more than one organisation.

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): Jenningsbet

11. Address of the premises (or, if none, give a description of the premises and their location):

144 High Road

Wood Green

London

Postcode: N22 6EB

12 Telephone number at premises (if known): Not known

13 If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

The building is located on a parade of shops which forms part of the main shopping area. The premises to be licensed is self contained and is situated on the ground floor. Above the premises there is a residential flat.

14(a) Are the premises situated in more than one licensing authority area? [No]

14(b) If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

[*****]

Part 4 – Times of Operation

- 15(a) Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? [No] [delete as appropriate] 15(b) If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	Start	Finish	Details of any seasonal variation
Mon	[hh:mm]	[hh:mm]	[*****]
Tues	[hh:mm]	[hh:mm]	[*****]
Wed	[hh:mm]	[hh:mm]	[*****]
Thurs	[hh:mm]	[hh:mm]	[*****]
Fri	[hh:mm]	[hh:mm]	[*****]
Sat	[hh:mm]	[hh:mm]	[*****]
Sun	[hh:mm]	[hh:mm]	[*****]

- 16 If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

[*****]

Part 5 - Miscellaneous

- 17 Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): [*****]
- 18(a) Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? [No]
- 18(b) If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.
- 19(a) Do you hold any other premises licences that have been issued by this licensing authority?
- [No]
- 19(b) If the answer to question 19(a) is yes, please provide full details:
- [*****]

20 Please set out any other matters which you consider to be relevant to your application:

[*****]

Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/ We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21 Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: Emma Johnson - Walker Morris

Date: 19/02/08

Capacity: Solicitor's for applicant

22 For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: [*****]

Date: (dd/mm/yyyy)

Capacity: [*****]

Part 8 – Contact Details

- 23(a) Please give the name of a person who can be contacted about the application: Andrew Woods or, Emma Johnson
- 23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: Andrew Woods 07738 170 138 or , Emma Johnson - 0113 283 4441
- 24 Postal address for correspondence associated with this application:
- Walker Morris
Kings Court
12 King Street, Leeds
Postcode: LS1 2HL
- 25 If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:
andrew.woods@walkermorris.co.uk, emma.johnson@walkermorris.co.uk

APPENDIX 2

CODES OF PRACTICE

GAMBLING COMMISSION

Typical Licence Conditions and Codes of Practice for:
Non-Remote General Betting Operators
(on and off course bookmakers)
August 2007

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Introduction

The Gambling Act 2005 (the Act) creates new arrangements that govern the way organisations and individuals involved in gambling can operate. From September 2007, most operators who wish to run a gambling business in Britain, and certain key individuals, need to be licensed by the Commission. There are some exemptions. The Commission has developed general licence conditions and codes of practice that govern how gambling facilities are provided and managed and gambling conducted.

This document sets out an example of the relevant conditions and code provisions for holders of a *Non-Remote General Betting* operating licence. It does not include statutory conditions, any licence conditions imposed by the Secretary of State or any conditions the Commission might attach solely to an individual licence.

This document is intended to be a general example only and does not replace the conditions and codes which will be attached to the operating and personal licences when these are issued. It should not be considered a definitive guide. However, this licensee-specific example will, we hope, aid operators' and stakeholders' understanding about the requirements on licensees.

Individual licence holders will receive copies of the conditions and codes which apply to their particular licence when their licence is issued to them. In some cases, the licence will set out individual conditions that are specific to that operator, based on the assessment of their licence application.

The Commission has powers to prosecute operators and can impose fines on operators who breach their licence conditions or social responsibility code of practice provisions, and can take breaches of the ordinary codes of practice into account as part of a prosecution. Licence conditions and social responsibility codes of practice detail the legal obligations attached to holding an operating licence. Ordinary codes of practice detail the manner in which facilities for gambling should be provided.

Part I of this documents sets out the Licence Conditions.

Part II of this document sets out the relevant provisions of the code of practice. The text in shaded boxes comprises the 'social responsibility provisions' and covers issues including the promotion of responsible gambling and marketing. The text that is not shaded which is titled 'ordinary code provisions' covers issues including the employment of children and young people and age verification.

Where a Condition or Code provision appears in the full Licence Conditions and Codes of Practice but does not apply for this type of licence, it has not been reproduced here. Where this is the case, there may gaps in the sequential numbering of the individual conditions.

You can obtain copies of this document and the other documents mentioned above from the Commission's website, www.gamblingcommission.gov.uk or by writing to:

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

T 0121 230 6666

F 0121 230 6720

E info@gamblingcommission.gov.uk

Part I: Gambling Commission General Licence Conditions

Licence Conditions applicable to providing facilities for betting other than pool betting

1 Personal licences and qualified persons

Operating licences issued to small-scale operators

In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

Schedule X¹ lists those individuals notified to the Commission as qualified persons.

If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under s104(1)(b) for amendment of the details of the licence set out in Schedule X¹.

An application for amendment under s104(1)(b) may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.

Schedule Y¹ to this licence lists those of the licensee's employees whose details have been provided to the Commission as authorised by the licensee to accept bets on the licensee's behalf on a track otherwise than under the supervision of a qualified person present on the same track.

Should the licensee wish to add an individual to the list or remove the name of an individual from the list the licensee must make application to the Commission under s104(1)(b) for amendment of that detail of the licence. Any employee the licensee wishes to add to the list may act unsupervised pending amendment of the licence provided a valid amendment application has been lodged with the Commission.

In this condition 'qualified person' has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

1.2 Personal licences

(a) Subject to (e) and (f) below licensees must ensure:

(i) that each individual who occupies one of the management offices specified in (b) below in or in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and

(ii) that at least one person occupies at least one of those offices.

(b) The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:

- the overall management and direction of the licensee's business or affairs;
- the licensee's finance function as head of that function;
- the licensee's gambling regulatory compliance function as head of that function;
- the licensee's marketing function as head of that function;
- the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software; or
- oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area.

¹ The schedules mentioned here will be attached to individual licences.

(c) Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.

(d) Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.

(e) Paragraphs (a) to (d) above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').

(f) During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs (a) to (e) above shall apply subject to the proviso that the phrase 'each individual' in paragraph (a)(i) shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

3 Financial robustness

All company licensees must notify the Commission of the name and address of any person who becomes a shareholder in the company or its holding company holding 3% or more of the issued share capital of the company or its holding company; or any existing shareholder who acquires a holding of 3% or more of the issued share capital of the company or its holding company.

In this condition 'holding company' has the meaning ascribed to that term by section 736 of the Companies Act 1985 (as amended).

4 Protection of customer funds

Licensees who hold customer funds for use in future gambling must set out clearly, in information made available to customers in writing, whether they protect customers funds in the event of insolvency and the method by which this is achieved.

5 Cash handling

Licensees, as part of their internal controls and financial accounting systems, must have in place and follow written policies and procedures concerning the handling of cash, and cash equivalents (ie bankers drafts, cheques and debit cards), designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit and to provide assurance that gambling activities are being conducted fairly.

7 General fair and open provisions

Licensees must satisfy themselves that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.

An accurate summary of the contractual terms on which gambling is offered must be made available to customers and set out in plain and intelligible language.

Customers must be notified of changes to terms before they come into effect.

14 Access to premises

Licencees must have in place and implement written policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences etc

Licencees must provide the Commission with any information that they suspect may:

- relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition; or
- lead the Commission to consider making an order to void a bet.

Licencees who accept bets, or facilitate the making or acceptance of bets between others, on the outcome of horse races or other sporting events governed by one of the sport governing bodies for the time being included in Part 3 of Schedule 6 to the Act must also provide the relevant sport governing body with any information the licensee suspects may:

- lead the Commission to consider making an order to void a bet; or
- relate to a breach of a rule applied by that sport governing body.

15.2 Reporting 'Key Events'

Licencees must notify the Commission of the occurrence of any of the following key events as soon as reasonably practicable and in any event within 5 working days of its occurrence:

- in the case of licencees which are companies, their (or any group company of theirs) being placed in liquidation, administration or receivership: in this condition a 'group company' is any subsidiary or holding company of the licensee – as those terms are defined in s736 Companies Act 1985 or any statutory modification or re-enactment thereof – and any subsidiary of such holding company;
- in the case of a licensee who is an individual (or a partner in a partnership licensee) their becoming bankrupt within the meaning of section 381 of the Insolvency Act 1986 or sequestration of their estate under section 12(1) of the Bankruptcy (Scotland) Act 1985;
- where the licensee is required to have its accounts independently audited, any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an audit certificate;
- the departure from the licensee's business of any holder of a personal management licence, other than those with oversight of the day to day management of licensed premises of a licensee operating more than 4 licensed premises;
- any reduction in the licensee's employed staff by more than 10% provided that represents at least 3 individuals;
- the acquisition or disposal of gambling premises or pitches;
- in the case of corporate licencees, the disposal or acquisition of any group company;
- the disposal of assets to the value of 10% or more of the licensee's total net assets;
- any breach of a covenant given to a bank or other lender;
- any default in making repayment of the whole or any part of a loan on its due date;
- any court judgments remaining unpaid 14 days after the date of judgment;
- the commencement of any material litigation against the licensee;
- any instance of internal or external fraud or theft involving a sum in excess of £10,000; and
- the commencement of disciplinary action against the holder of a personal licence where the licence holder is suspended or serious misconduct is alleged.

15.3 General and Regulatory Returns

On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:

- the numbers of people making use of the facilities and the frequency of such use;
- the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them; and
- the licensee's policies in relation to, and experiences of, problem gambling.

In particular, within 28 days of the end of each quarterly or annual period as the case may be, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require².

Part II: Gambling Commission Codes of Practice

Codes of Practice applicable to providing facilities for betting other than pool betting

1 Financial requirements

Ordinary code provision

As part of their procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should:

- unless there is a specific reason not to do so, appoint one or more nominated officers whose duty it is to take overall responsibility for the anti-money laundering procedures within the operation, in particular with respect to Suspicious Activity Reporting;
- ensure, through appropriate training and guidance, that all staff who handle money or accounts or accept bets are aware of their duties under anti-money laundering legislation to report all suspicious activity to the nominated officer in a timely manner or, where there is no such nominated officer, directly and promptly to the police. It is the nominated officer's duty to consider such reports and to forward them where appropriate to the Serious Organised Crime Agency; or
- adopt (or reflect in their procedures) the Association of British Bookmakers' guidelines.

2 Protection of children and other vulnerable persons

2.1 Combating problem gambling

Social responsibility code provision

Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling.

Licensees' policies and procedures for socially responsible gambling must include but need not be confined to:

- the specific policies and procedures required by the following provisions of section 2 of this code;
- a commitment to and how they will contribute to research into the prevention and treatment of problem gambling;

² The current forms of the sector specific returns and guidance notes for their completion are available on the Commission's website www.gamblingcommission.gov.uk and can also be obtained by writing to the Commission at Victoria Square House, Victoria Square, Birmingham B2 4BP.

- a commitment to and how they will contribute to public education on the risks of gambling and how to gamble safely; and
- a commitment to and how they will contribute to the identification of and treatment of problem gamblers.

2.2 Access to gambling by children and young persons

Social responsibility code provision

Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.

This must include procedures for:

- checking the age of apparently underage customers;
- removing from adult only licensed premises anyone who appears to be underage who tries to access the gambling facilities and cannot produce an acceptable form of identification;
- taking action when there are attempts by under-18s to enter adult only premises;
- refusing entry to any adult-only area of a track to anyone unable to produce an acceptable form of identification; and
- taking action when there are unlawful attempts to enter the adult-only areas.

Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.

In premises restricted to adults, service should be refused in any circumstances where any adult is accompanied by a child or young person.

Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This should include appropriate training which must cover the legal requirements on returning stakes and not paying prizes to underage customers.

Licensees must only accept identification which:

- contains a photograph from which the individual can be identified;
- states the individual's date of birth;
- is valid; and
- is legible and has no visible signs of tampering or reproduction.

Ordinary code provision

The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (eg Citizencard, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photocard; and a passport.

Licensees should implement procedures that require their staff to check the age of any customer who appears to them to be under 21.

Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.

Procedures should be in place for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling.

2.3 Information on how to gamble responsibly and help for problem gamblers

Social responsibility code provision

Licencees must make information readily available to their customers on how to gamble responsibly and how to access information about and help in respect of problem gambling.

Licencees must take all reasonable steps to ensure that this information is readily accessible including in locations which enable the customer to obtain it discreetly.

For gambling premises this should include:

- information in the gambling area, near gaming machines and near to where ATMs are located; and
- posters, or leaflets that may be collected discreetly and taken away, in other areas (eg toilets and near to exit doors).

The information must be prominent, and appropriate to the size and layout of the premises.

The information must cover where relevant:

- the availability of measures that are accessible to help an individual monitor or control their gambling, such as to restrict the duration of a gambling session or the amount of money they can spend;
- the availability of timers or any other forms of reminders or 'reality checks' that may be available;
- self-exclusion options; and
- information about the availability of further help or advice.

The information must be directed to all customers who wish to enjoy gambling as entertainment, and not be targeted only at those the operator perceives to be 'problem gamblers'.

Ordinary code provision

Licencees who market their services in one or more foreign languages should make available in that, or those, foreign languages:

- the information on how to gamble responsibly and access to help referred to above;
- the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code; and
- the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

2.4 Customer interaction

Social responsibility code provision

Licencees must implement policies and procedures for customer interaction where they have concerns that a customer's behaviour may indicate problem gambling. The policies must include:

- identification of the appropriate level of management who may initiate customer interaction and the procedures for doing so;
- the types of behaviour that will be logged/reported to the appropriate level of staff and which may trigger customer interaction at an appropriate moment;
- the circumstances in which consideration should be given to refusing service to customers and/or barring them from the operator's gambling premises; and
- training for all staff on their respective responsibilities, in particular so that they know who is designated to deal with problem gambling issues.

But such policies and procedures should be consistent with, and implemented with due regard to, licencees' duties in respect of the health and safety of their staff.

2.5 Self-exclusion

Social responsibility code provision

Licensees must put in place procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.

Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.

Licensees must take all reasonable steps to prevent any marketing material being sent to a self-excluded customer as soon as practicable. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.

Licensees must close any customer accounts of an individual who has entered a self exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.

Licensees must implement procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling; and which include:

- a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
- photo identification (where available and in particular where enforcement of the system may depend on photographic ID), and a signature;
- staff training to ensure that staff are able to enforce the systems; and
- the removal of those persons found in the gambling area or attempting to gamble from the premises.

Ordinary code provision

Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.

Wherever practicable, individuals should be able to self-exclude without having to enter gambling premises.

Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.

Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.

Licensees should encourage the customer to consider extending their self exclusion to other licensees' gambling premises in the customer's local area.

Customers should be given the opportunity to discuss self-exclusion in private, where possible.

Licensees should take all reasonable steps to ensure that:

- the self-exclusion period is a minimum of six months and give customers the option of extending this to a total of at least five years;
- a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
- at the end of the period chosen by the customer (and at least six months later), maintain the self-exclusion in place, unless the customer takes positive action in order to gamble again. No marketing material may be sent to the individual unless the individual has taken positive action in order to gamble again, and has agreed to accept such material; and
- where a customer chooses not to renew, and makes a positive request to begin gambling again, give the customer one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person.

(Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.)

2.6 Employment of children and young persons

Ordinary code provision

Licensees who employ children (under-16s) and young persons (those aged 16 and 17) should be aware that it is an offence:

- a) to employ children to provide facilities for gambling in connection with football pools;
- b) otherwise to employ children and young persons to provide facilities for gambling
- c) if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
- d) to employ them to carry out any other function on betting licensed premises while any gambling activity is being carried on in reliance on the premises licence.

As to (c) it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.

Accordingly, licensees should have policies and procedures designed to ensure that:

- children and young persons are never asked to perform tasks within (a) or (b) above;
- all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons;

and should consider adopting a policy that:

- children and young persons are not employed to work on betting licensed premises at any time when the premises are open for business; and
- gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

2.7 Provision of credit by licensees and the use of credit cards

Social responsibility code provision

Licensees who choose to accept credit cards must:

- accept payment by credit card for gambling only where that payment is made to a customer account; and
- make available for gambling, funds deposited via credit card only after the card issuer has approved the transaction.

Ordinary code provision

Licensees who choose to offer credit to members of the public who are not themselves gambling operators should also:

- have procedures for checking and scoring applications for credit from such customers, for setting, and for the increase of, credit limits;
- explain these procedures to customers;
- set a maximum credit limit for each customer and not permit customers to exceed that limit without further application;
- apply a 24-hour delay between receiving a request for an increase in a credit limit and granting it in those cases where the limit exceeds that which the operator had previously set;
- not require a minimum spend within a set time period;
- take reasonable steps to ensure that offers of credit are not sent to vulnerable persons, including those who have self-excluded from gambling; and
- ensure that information about an offer of credit includes a risk warning of what may happen in the event of default.

2.8 Money lending between customers

Ordinary code provision

Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3 Fair and open provisions

Social responsibility code provision

Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

Social responsibility code provision

Licensees must set out within the full rules that they make available, the core elements for the acceptance and settlement of bets. These rules must cover:

- the circumstances under which the operator will void a bet;
- treatment of errors, late bets and related contingencies;
- availability of odds for any ante-post, early show or starting price betting, and treatment of place, forecast bets etc;

- treatment of withdrawals, non-runners, and reformed markets;
- maximum payout limiting liability for a specific betting product or generally;
- any charges made to customers for the use of betting services or products, and how these are calculated (including deductions from winnings for commission, or in respect of withdrawn horses etc);
- means or medium by which the outcome of an event will be determined;
- the rules for the event itself to be specified (eg horserace bets only to be accepted where the racing is subject to Horseracing Regulatory Authority rules);
- where bets are accepted on 'pari-mutuel' terms; and
- any special arrangements for settling bets on 'coupled' horses.

Where special rules have been agreed in relation to a particular bet these must not be overridden by any conflicting rules or subsequent rule changes.

Licensees must issue betting slips or an electronic acknowledgement (other than in the case of telephone betting) for each transaction which include information as to the operator's name and contact details, and words equivalent to 'Bets are accepted in accordance with the operator's rules'.

Social responsibility code provision

In their terms on which bets may be placed (required to be displayed in accordance with mandatory conditions attaching to their premises licences) licensees must give prominence to their rules concerning voiding, late bets and maximum payouts.

When providing facilities for betting on-course, licensees must display on their 'joints' in an intelligible format:

- any rules that differ from Tattersalls' 'Rules on Betting' or the British Greyhound Racing Board's 'Regulations for the conduct of on-course bookmaking' as applicable³;
- any types of unorthodox bets accepted (such as forecast betting, betting without the favourite, distance betting etc);
- whether win-only or each way bets are accepted;
- any concessions or bonuses offered;
- all of the runners and the odds available to the public;
- the operator's trading name and contact address;
- the minimum bet accepted; and
- the maximum guaranteed liability.

Licensees operating within the ring at horserace tracks must issue customers with a betting slip or ticket for each transaction accepted. Betting slips or tickets must include the following information:

- operator's name and contact details;
- race day name or code, date and race number;
- name and/or number of the selection;
- the stake and potential return;
- the odds, or whether the bet will be settled according to the Starting Price;
- the type of bet.

Any special rules which have been agreed in relation to a particular bet must not be overridden by any conflicting rules or subsequent rule changes.

³ The references to Tattersalls' 'Rules on Betting' and the British Greyhound Racing Board's 'Regulations for the conduct of on-course bookmaking' reflect the current position and may need to be amended in future.

Ordinary code provision

Where licensees offer to accept bets, or facilitate the making or acceptance of bets between others, on the outcome of a sport regulated by a sport governing body for the time being included in Part 3 of Schedule 6 of the Act they should take all reasonable steps to familiarise themselves with the rules applied by that body.

4 Marketing

Social responsibility code provision

If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:

- a) the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to customers;
- b) neither the receipt nor the value or amount of the benefit is:
 - (i) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - (ii) dependent on the amount the customer spends on gambling within a predetermined length of time which is shorter than the whole of the period during which the particular benefit is made available;
- c) if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases;
and further that:
- d) if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Ordinary code provision

Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

Ordinary code provision

Licensees should comply with the advertising codes of practice which apply to the form and media in which they advertise their gambling facilities or services.

5 Complaints and disputes

Social responsibility code provision

Licensees must put in place a written procedure for handling customer complaints and disputes.

In this code a 'complaint' means a complaint about any aspect of the licensee's conduct of the licensed activities, and a 'dispute' is any complaint which:

- a) is not resolved at the first stage of the complaints procedure; and
- b) relates to the outcome of the complainant's gambling transaction.

Licensees must ensure that:

- customers are told the name and status of the person to contact about their complaint;
- customers are given a copy of the complaints procedure on request or on making a complaint; and
- all complaints are handled in accordance with the procedure.

Licensees must also ensure that customers whose disputes are not resolved to their satisfaction by use of the complaints procedure may refer them to an independent third party. The arrangements under which such complaints are referred may, but need not, provide for the third party's decision be binding on the licensee and the customer.

Licensees must keep a record of all complaints that are not resolved at the first stage of the complaints procedure.

Licensees must arrange for a copy of the decision on, or a note of the outcome of, each dispute referred to the independent party to be provided to the Commission quarterly, either by the independent party or by the licensee.

6 Gambling licensees' staff

Social responsibility code provision

Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

Gambling Commission August 2007

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**

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

T 0121 230 6500
F 0121 230 6720
E info@gamblingcommission.gov.uk

APPENDIX 3

LETTERS OF REPRESENTATION

The Salvation Army

United Kingdom Territory
with the Republic of Ireland



Wood Green Christian Centre

24 Lymington Avenue, Wood Green, London. N22 6JA

Telephone: 020-8888 9466

Fax: 020-8888 9755

Mobile: 07799 495674

Email (David Taylor): david@wgcc.org.uk (Church Office): office@wgcc.org.uk

Tuesday, 11 March 2008

Daliah Barrett
Licensing Officer,
Haringey Council.

Dear Ms Barrett,

It has come to my attention that an application for a License has been made by Jennings for 144 High Road, Wood Green.

I wish to object to this License.

The grounds for my objection, as someone who has worked in Noel Park for 15 years, is a member of the local Safer Neighbourhoods Noel Park Ward Panel and is presently purchasing a house on Noel Park, are as follows:

1. We already have a Ward priority based upon the presence of gaming venues, and in particular the Quicksilver Gaming Business. Sgt Andy Underwood (90YR). will be able to confirm this priority, and I have enclosed the March 2008 Safer Neighbourhoods newsletter which will support this priority.
2. Furthermore, numerous complaints have been made by residents around young people on the premises who act threateningly outside.
3. I understand that 102 criminal incidents have been linked to gaming and betting venues in Wood Green in the last 12 months and approximately 50 of these have been related to the William Hill bookies on the High Street.

I believe that it is clear that a further application will only serve to escalate the crime and disorder already being experienced within our area and raise the impact that is already being felt by children and vulnerable people.

Furthermore I would be grateful if you could keep me informed by email (contact details – david@wgcc.org.uk) of any further Licensing applications.

Yours sincerely,

David Taylor
Major

A Christian Church and a Registered Charity No. 214779, and in Scotland SC009359



**METROPOLITAN
POLICE**

Working together for a safer London



NOEL PARK SAFER NEIGHBOURHOOD TEAM

Contact us now on – 0208 7212 678 - alternatively email us - Noelpark.SNT@met.police.uk

Sergeant Andy UNDERWOOD 90YR
PC Colin BULLAMORE 677YR
PC Andy FOSTER 493YR
PC Jacqui REID 234YR
PCSO Carol PHILLIPS 7102YR
PCSO Mel MOUZOURIS 7105YR
PCSO Mark HARRISON 7191YR
PCSO Allison SANDERS 7200YR

**Noel Park Safer Neighbourhood Team
9/9A Turnpike Parade
Green Lanes
N15 3EA**

•Telephone: 0208 721 2678

•Office: 0207 161 9506

•Email: NoelPark.SNT@met.police.uk

Dear Resident,

Here is the February edition of our newsletter, I hope you find it informative. It is designed to keep you up to date with what your dedicated Safer Neighbourhood Team has been doing to combat crime and improve the quality of life in your area over the past month.

Ward Priorities

New ward priorities have been set as follows -

- Quicksilver Alleyway - Area to the rear of 7-27 High Road, N22
- Sky City- Anti Social Behaviour by youths
- Supply of Cannabis

Whilst these remain our priorities we remain committed to tackling all problems across the ward.

Drugs Warrants

Over the past month, the team has executed two drugs warrants across the ward with several arrests and numerous quantities of drugs seized. If you believe that any form of illegal drugs is happening where you live Contact the Noel Park Safer Neighbourhood Team now on - 0207 161 9506 alternatively email us at NoelPark.SNT@met.police.uk.

Route 29 Bus Operation

The team recently assisted Harringay Safer Neighbourhood Team in an operation targeting fare evaders using the route 29 bus, which runs through Wood Green High Road and Green Lanes. The operation was successful with over 1300 fares checked and many fare evaders receiving penalty fines.

ASBO'S (Anti Social Behaviour Orders)

The team are actively working towards gaining anti-social behaviour orders against prolific offenders on our ward. Anti Social Behaviour Orders (ASBO's) originate from the platform of the Crime and Disorder Act 1998 - this piece of legislation was introduced by the government and it focuses on many of the different areas of criminal activity, different crimes and disorderly behaviour.

What is anti-social behaviour?

Anti-social behaviour doesn't necessarily have to be physically based, but obviously this is very relevant. It can also be foul and abusive language, threatening behaviour, assault, shouting, criminal damage, theft, disorderly conduct, vandalism, intimidation & bullying, racial harassment, homophobic behaviour, behaviour as a result of drug or alcohol misuse, noise which is excessive and particularly late in the night time, graffiti & littering - there are many forms and this is by no means an extensive listing. If you believe that any form of anti-social behaviour is happening where you live Contact the Noel Park Safer Neighbourhood Team now on - 0207 161 9506

Ward Panel now recruiting:

The Noel Park SNT ward panel is recruiting for new members to increase the representation of Noel Park residents on the panel. The panel meets approximately every 6 weeks at the Salvation Army Center in Lymington Avenue. We are particularly looking for residents from the Sky City estate and the Noel Park Estate. At these meetings the panel discusses local issues and selects three every six months for the team and partners to work on. If you are interested please contact Sgt Underwood either via e mail or on 0208 721 2678.

Burglary

The threat of burglary remains persistent. A few simple steps can greatly reduce the risk of you becoming a victim. Make sure all doors and windows are locked especially at night. Use a timer to randomly switch your lights on and off if you are away for any length of time.

All the best

Noel Park SNT

Daliah Barrett-Williams
Licensing Team
Enforcement Service
Technopark
Ashley Road
Tottenham
London
N22 9LN

18/03/08

Dear Sir/Madam

re: **Gambling Act 2005**
Premises: Jenningsbet, 144 High Road, Wood Green, London, N22
8LE.

I write on behalf of William Hill Organization Ltd who trade at premises 8 The Broadway, Wood Green, N22.

Accordingly we have Business interests which may be affected if this application were to be granted. As an interested party William Hill is entitled in accordance with S.158 of the 2005 Act to make representations.

In the betting sector many operators have entered the market using various incentives and inducements to attract business from existing operators and create new customers. These bonuses/concessions are introduced to promote the feeling of low risk gambling.

Jennings have targeted areas with established and mature betting markets and have actively promoted their package of bonuses and concessions. If Jennings are granted a further licence in Wood Green they will provide their package of various incentives and inducements to attract business from existing operators and create new customers. This package, which we shall provide details of to the Licensing Sub-Committee, includes offers such as treble odds on a lucky 15 and back shows.

Further more, in previous court hearings, Jennings have always stated that if they were granted a licence there would be a growth in the betting market. A growth in the market is achieved in two ways: the patrons of the existing betting offices are betting more or persons who are currently not betting are suddenly having a bet.

What the committee must ask itself is would the grant of Jennings with their various incentives and inducements have an effect on the vulnerable at this part of Wood Green. Paragraph 5.20 in the Guidance to Licensing Authorities 2nd edition provides the closest definition of "vulnerable persons":-

"The Commission will not seek to define "vulnerable persons", but it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means..."

Betting is a minority activity which will be confirmed by extracts from the Mintel Report. The sub-committee shall then be asked to draw the conclusion that if Jennings are granted a licence then only through enhancements and inducements shall they attract the required business. The sub-committee shall then be asked to decide on whether the enhancements and inducements may lead to the vulnerable being affected.

There are further factors which may be relevant to the application such as over-exposure to gambling in this part of Wood Green which could happen if another gambling outlet was to open. In the immediate vicinity are four licensed betting offices with a further three located on the High Road towards Turnpike Lane, details of which shall be provided to the committee.

Over proliferation which could lead to overexposure is covered at paragraph 7.49 of the guidance to Licensing Authorities which states:-

"Thus, for example, the following examples of possible representations would not be likely to be relevant:

- That there are already too many gambling premises in the locality **(although it may be relevant if it points, as a result, to rising problems in crime, disorder, underage gambling or problem gambling)**;

There is nothing in paragraph 7.49 of the Gambling Commission Guidance or indeed in section 153(2) of the Act which would support the contention that the number of facilities offered by existing premises is an irrelevant consideration in the context of considering an application under section 153(1) of the 2005 Act. Section 153(2) does not say that demand for existing premises is an irrelevant consideration. What it provides is that expected demand for the facilities proposed to be provided in the premises for which the application is made is not a relevant consideration.

William Hill will provide to the sub-committee details of the gambling facilities in this part of Wood Green. The sub-committee will then have an opportunity based on the numbers to make a finding as to whether the grant of the Jennings office may exceed the tipping point and lead to too many gambling premises which could result in a rise in either crime, disorder, underage gambling or problem gambling.

There is nothing in the Gambling Act 2005 which requires William Hill to provide any evidence of risk to the licensing objectives, instead the sub-committees attention shall be drawn to the text "Gambling for Local Authorities" whose editor Philip Kolvin is the chairman of the Institute of Licensing. In the book specific reference is made to a "Statutory Discretion" which allows a sub-committee to take into account other factors when coming to a decision. At paragraph 11.80 it states:-

"However, the expression "aim" sits much less happily in the core discretionary power of a quasi-judicial body. For it is inherent in the concept of aiming that the party aiming may not always succeed in hitting the target. Parliament could have stated that in certain circumstances the authority "shall permit". That is the course it took recently in relation to the Licensing Act 2003, which provides that absent relevant representations premises licence applications must be granted. There are no fewer than nine conditional "shall grant" provisions in the Gambling Act itself.

The indication which can be drawn from this is that Parliament had it in mind that while compliance with sub-paras (a)-(d) may be powerful factors presuming in favour of grant, they are not conclusive factors and may yield to others. Otherwise, "shall aim" becomes "shall", an expression Parliament has apparently deliberately not used here."

We trust that this letter provides details of the risk to the licensing objectives that this application engenders. In the mean time if you require any further information on this matter please do not hesitate to contact me at the above address or e-mail ndhanjal@williamhill.co.uk, telephone 0208 918 3777.

Yours Sincerely,

Nindi Dhanjal
Development Manager
William Hill