

**Section 1 - Detailed written replies and miscellaneous comments**

Source	Comments made / summary of comments	Reply	Policy Changes
<p>Overview and Scrutiny Committee Meeting – 4<sup>th</sup> September 2006.</p>	<ol style="list-style-type: none"> <li>1) Remove reference to excellent transport links in introduction section</li> <li>2) Section on vulnerable persons should be defined more clearly</li> <li>3) Improve Map of Leeds District. Seek clarification from Cllr X on this point.</li> </ol>	<ol style="list-style-type: none"> <li>1) Comments duly noted.</li> <li>2) Comments duly noted.</li> <li>3) Comments duly noted.</li> </ol>	<ol style="list-style-type: none"> <li>1) Policy will be updated accordingly.</li> <li>2) Owing to responses made from other respondents the term vulnerable persons will be expanded to include several new groups which in essence will offer a clearer breakdown of who the Council will view as vulnerable.</li> <li>3) Map will be amended accordingly.</li> </ol>
<p>Cllr R Feldman (by telephone)</p>	<p>Raised concerns regarding the category B2 gaming machine as per the table contained in the policy at page 28 .</p>	<p>The category B2 is not actually a traditional slot machine. It refers to a type of gaming machine known as a fixed odds betting terminal (FOBTs). These are a new type of gaming machine which generally appear in licensed bookmakers.</p> <p>FOBTs have ‘touch-screen’ displays and look similar to quiz machines familiar in pubs and clubs. They normally offer a number of games, roulette being the most popular. This allows betting shops the opportunity to offer their customers casino style table games with maximum prizes of £500 with each spin of the roulette wheel. Money is inserted either as notes or coins in the machine itself or using a debit card over the counter. Initial deposits could be over £100. To place a bet you choose the size of your initial stake and touch the screen on the relevant numbers or other</p>	<p>Owing to the special nature of these machines (which are only allowed in casinos and bookmakers) we will insert more information by way of a Footnote or similar to repeat some of the explanation as detailed in the cell left.</p>

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		<p>selections (such as red/black or odd/even) to place the bet on the table. Once you have placed your bets you touch the screen again to set the roulette wheel spinning. The wheel will come to rest after about 15 seconds.</p> <p>It would appear therefore that the maximum stake of £100 refers to the number of chips you can stake in any one game where the maximum cost of each chip is £15.</p>	
CIIR R Feldman (by telephone)	Asked for the Grand Theatre to be included at section 2.4 of the policy.	Comments duly noted.	Policy updated accordingly
Association of British Bookmakers (ABB)	<p>The ABB pressed for any conditions regarding door supervisors to only be used in exceptional cases where the particular circumstances of the case make it both necessary and proportionate. The ABB argued that historically door supervision has not been necessary at bookmakers. They suggested the following wording:</p> <p>“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.”</p>	The Council fully accepts the comments made however we feel no policy changes are required.	None required
Association of British Bookmakers (ABB)	The ABB expressed concern at the draft policy’s statement regarding location issues and asked that the following statement be added, “ The Council will	While the ABBs concern is noted it goes without saying that any decision the Licensing Authority takes would be evidential taking in to account the particular circumstances of the	None required

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	require evidence that the particular location of the premises would be harmful to the licensing objectives. The mere location of the premises near to any of the premises or area referred to will not in itself result in the application being refused.”	application in question. The sub policy to look at location issues should be taken in the context of the wider policy aims set down at para 1.5 and para 5.1.	
Association of British Bookmakers (ABB)	With regards enforcement the ABB asked that the following paragraph be inserted, “ The authority recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are 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.	Given that the Statement of Gambling Policy is a high level strategic document aimed at a multitude of business types the Council takes the view that it should not include specific operational arrangements focused on any one particular sector. This suggestion will be noted and considered in any local enforcement protocol.	None required
Roger Etchells	Roger Etchells raised concern that the draft policy did not include more information on representations stating, “We note at para 7.6 that the issue of representations is to be the subject of a separate guidance note. We do not believe it appropriate for separate guidance to be provided in relation to the making of representations. Such guidance should be contained in the policy and should be the subject of a full consultation with all sectors to ensure that all have an opportunity to comment. Accordingly any such guidance should be in the main policy document and have been fully consulted on.	When LCC comes to prepare its guidance on the making of representations it will act in accordance with the primary legislation, any related regulations plus guidance issued by the Gambling Commission. Accordingly Leeds City Council takes the view that all these documents will have been through a thorough consultation process prior to release and as LCC will not depart from this guidance our approach will be consistent with national guidelines and best practice.	None required

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Source	Comments made / summary of comments	Reply	Policy Changes
Roger Etchells	Roger Etchells raised concerns with regards to para 13.11 of the draft statement stating, “The third (final sentence) of paragraph 13.11 seems to amount to a duplication of the planning process contrary to the first part of the paragraph and contrary to the guidance set out in the Gambling Commission’s guidance to local authorities of April 2006. We would urge that the sentence be deleted.	Council is unclear as to the meaning of this representation. Clarification sought from Roger Etchells.	Pending
Roger Etchells	Roger Etchells raised concerns with regards to para 14 of the draft statement stating, “We are concerned about the reference to possible conditions referring to proof of age, CCTV, door supervision and opening hours. We appreciate that such conditions are said not to be mandatory but are concerned that the reference to matters which are set out as potentially being the subject of conditions will, in effect, establish a presumption that conditions should be imposed in respect of those matters.	Leeds City Council takes the view that guidance should be contained in the policy as to the areas that could be made the subject of conditions so that applicants can then address such matters through their applications. The Council is still bound to operate in accordance with the Act and applicants have the power of appeal if they feel the Council has departed from its policy or the legislation.	None required
British Beer and Pub Association (BBPA)	The BBPA made comments regarding the automatic entitlement embedded in the Act for alcohol licensed premises to provide 2 gaming machines. They also consider that generally there should be no reason why alcohol licensed premises should not be able to benefit from providing more than two machines by applying for the requisite permit under the Act and that that it may be useful for the policy statement to reflect this.	Leeds City Council will consider if a statement can be incorporated in the policy which reflects this suggestion retaining the important provision in the Act which permits licensing authorities, during the application process, to satisfy themselves regarding such matters as they think relevant”.	Pending

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The Race Course Association (The RCA)	The RCA is concerned that the Licensing Authority may require separate licences for certain facilities – They state, “The Council may require off-course operators with on-course facilities to hold a separate betting premises licence for this area. Discussions with DCMS have indicated that this will not be a mandatory requirement, and will be at the discretion of the racecourse and the betting operator. This should be reflected in the statement of principles.”	Currently the statement indicates at Para 18.6 the following, “The Council agrees with the Commission’s view that it is preferable for all self-contained premises operated by off-course betting operators on tracks to be the subject of separate premises licences. This ensures 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.” The Council will investigate if this policy is at odds with DCMS guidance and if necessary make any change accordingly.	Pending
The Race Course Association	The RCA note that councils may apply conditions to racecourse premises licences to try and create a suitable betting environment, given that operators may not be required to hold an operators licence. The RCA ask that these conditions do not exceed those conditions as are to be outlined by the DCMS.	The Council will operate within the framework of the default and mandatory conditions schema. At present the policy only suggests that the LA will expect applicants to offer their own measures to meet the licensing objectives, offering a list of areas that they may wish to focus on. While the RCA reply is appreciated, the Council is mindful that ‘tracks’ extend to a disparate number of premises types including dog tracks and sports stadia. For this reason the Council is seeking to include enough flexibility in this section of the policy to deal with all these different premises types.	None required
British Casino Association	The BCA sought to make some general observations about the casino industry through its consultation reply. The BCA stated that as the operation of casinos has been highly regulated over the past 40 years, the introduction of the ‘new’ legislation will not impact on the high level of integrity with which these premises have historically operated. The final point the BCA wished to make	None required	None required

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	<p>related to licence conditions and to draw specific attention to para 9.29 of the Gambling Commission’s guidance to Licensing Authorities which identifies matters which cannot be the subject of conditions.</p>		
Gamcare	<p>Gamcare asked the Council to recognise that under the new Act it has a ‘duty of care’ to become corporate parents assisting residents of the authority with gambling addictions.</p> <p>The reply also included a summary document containing a list of inclusions, which form GamCare’s viewpoint of what should be included in either the policy or as licensing conditions, these are as follows:</p> <ul style="list-style-type: none"> <li>• Leaflets offering assistance to problem gamblers should be available on gambling premises in a location that is both prominent and discreet such as toilets.</li> <li>• Self exclusion forms available</li> <li>• Operators should have regard to best practice issued by organisations that represent the interests of vulnerable people</li> <li>• Fixed Odds Betting Terminals (FOBTs) should clearly display odds</li> <li>• All ATMs or cash terminals should be separate from gaming machines so that clients will have to leave the machine area to acquire funds if so required. The ATMs should also display stickers with GamCare Helpline positioned prominently on</li> </ul>	<p>These suggestions are duly noted and will be considered.</p>	<p>Pending</p>

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Source	Comments made / summary of comments	Reply	Policy Changes
	<p>the machine</p> <ul style="list-style-type: none"> <li>• Casinos should be obliged to provide compulsory non-gambling areas or 'chill out rooms'.</li> <li>• Posters should be displayed on gambling premises suggesting 'stay in control of your gambling' with details of GamCare telephone number and website.</li> </ul>		
RAL Limited	<p>RAL limited expressed deep concern at any suggestion that a condition should be imposed on adult gaming centre premises licences requiring door supervisors especially as a mandatory condition. RAL cited various lines of argument Namely: to impose door supervisors on the grounds of crime and disorder would be disproportionate given the tenuous link between AGCs and any crime or disorder, AGCs are currently well managed premises who take their social responsibility duties with regards to children and vulnerable persons very seriously. To impose door supervisors would be unduly costly, onerous and burdensome on businesses that have already demonstrated their ability to uphold the licensing objectives.</p>	<p>The Council fully accepts the comments made however the policy statement repeatedly details the overriding principle of assessing each individual application on its merits on a case by case basis. For this reason we feel no policy changes are required.</p>	None required
Montpellier Estates	<p>Montpellier Estates offered several detailed replies using a consultation questionnaire to structure their comments.</p> <p>1) Montpellier estates indicated that the draft policy did not include sufficient control measures to promote the crime prevention licensing objective. They</p>	<p>1) This suggestion will be forwarded to the relevant team within Development for their consideration including the team dealing with the large/regional casino bid.</p>	Pending

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Source	Comments made / summary of comments	Reply	Policy Changes
<p>Montpelier Estates Cont...</p>	<p>suggested that a steering group should be established under the banner of the Leeds Initiative which could have an advisory role reporting to the council. The steering group would have regular contact with gaming operators, key community groups and the public. This would enable the council, in the form of the steering group, to have an ongoing arms length influence on the industry and facilitate the assessment of the attitudes and policies of gaming operators towards preventing gambling becoming a source of crime and disorder. The steering group together with the police should be involved in the design and build stage of new gaming premises, particularly for casinos under the new Act to ensure that the opportunities for crime and disorder are minimised from the outset.</p> <p>2) Montpellier estates also suggested measures to help bolster the policy in order to help children and vulnerable persons suggesting that operators of gaming establishments should be required to help fund education programmes and PR campaigns aimed at vulnerable members of the community. There could be varying degrees of involvement depending on turnover of the establishment and programmes could range from simple leafleting at the front desk of gaming venues through to organised educational schemes whereby disadvantaged children could be taught maths together</p>	<p>2) It is the Council's view that this would be an operational decision for the individual operator and while a useful suggestion would be unsuitable for a high level strategic document such as the Statement of Gambling Policy which is a document aimed at the principles of licensing. The suggestion will be noted however for consideration at any appropriate forums.</p>	<p>None required</p>



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<p>Montpelier Estates Cont...</p>	<p>with the potential hazards of gambling by means of learning about odds, multiplication, fractions, etc.  <b>3)</b> In terms of gaming machines Montpelier estates felt the policy required more stringent policies to be drawn up, for example Category C machines should not be allowed in the same room as category D machines and the access point between the two rooms should be supervised to ensure children can not gain access to restricted areas. The reply highlighted concern that superficial measures such as a coloured lines on the floor or rope barriers to delineate two gaming areas where children can see the higher stake machines beyond the barrier would only serve as an enticement.  <b>4)</b> Finally Montpelier Estates sought to highlight the advantages of locating any new casino developments in the city centre making the case that locating the casino in such an area would give the greatest chance of long term success for the casino, the entertainment complex and the city. They stated it would allow the most cost effective policing and monitoring, combined with an integrated design process which would minimise the detrimental effects of any such development.</p>	<p><b>3)</b> These suggestions are duly noted and will be considered.</p> <p><b>4)</b> This suggestion will be forwarded to the relevant team within Development for their consideration including the team dealing with the large/regional casino bid.</p>	<p>Pending</p> <p>None required</p>

**Section 2 - Questionnaire replies**

<b>Question 1) - Does the policy do enough to promote the crime prevention licensing objective?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/0089	Sports club	I think all gambling premises should be well away ½ mile from schools, youth clubs and any places that cater for younger citizens	The Council acknowledges this suggestion and has undertaken in the draft policy to investigate location issues such as these at Para 13.9. Any blanket policy such as the one suggested here would be outside the scope of the Act.	None required
GQU/0099	Anonymous Religious Body	Gambling should not even be considered in a high risk area. It is highly inappropriate and would put an extra burden on the police.	The Council acknowledges this comment however the Licensing Authority must assess each application on its merits in line with the provisions of the Act.	None required
GQU/0018	Anonymous Member of the public	More documented evidence of how the Council will work together with the police.	The Council has undertaken to prepare an enforcement protocol in conjunction with West Yorkshire Police and the other responsible authorities when the Act is brought into full effect. This document will explain how the police and LA will work together to promote this licensing objective.	None required
GQU/0017	Anonymous Other business owner	Very controlled regulation over people involved in the business, and restricted advertising techniques, and power to close the place down if its too much trouble socially.	i) The new Gambling Act by its very nature is an attempt to effectively regulate the gambling industry. ii) Advertising of some gambling products is restricted under the current licensing regime and the new Act and accompanying regulations will overhaul much of this old legislation. It should be noted however that the Council's remit under the Act does not extend to advertising. iii) Part 15 of the Act provides the Gambling Commission , local authorities, licensing authorities and the police with the powers necessary to monitor compliance with the provisions of the Act and with licence conditions, and to investigate suspected	None required

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<b>Question 1) - Does the policy do enough to promote the crime prevention licensing objective?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
			offences. There will be various means of addressing problem premises including powers of prosecution, closure powers and licence reviews.	
GQU/0062	Member of the public (non anonymous)	Council and Police enforcement protocols are notoriously deficient in both financial and material resources of appropriate quality and quantity.	None required	None required

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<b>Question 2) - Does the policy do enough to ensure gambling is conducted in a fair and open way?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/0009	Anonymous Member of the public	Someone needs to ensure that gambling is conducted in a fair and open way - to protect vulnerable people being exploited. If it's not the local council who issues the licence, (can could withdraw or suspend it) and it must go to the police and face criminal investigation, which let's face it, is more costly and less likely to happen, then there is more chance of venues being less stringent in this area.	The Council notes guidance issued to Licensing Authorities from the Gambling Commission which states, "Generally the Commission would note expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be a matter for either the management of the gambling business, and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence.	None required
GQU/0011	Anonymous sports centre	Statistical scrutiny of gaming events (roulette wheels) and financial payouts/profits	This would be a matter for the Gambling Commission. NB: The new regime brings in controls over the companies which manufacture gaming equipment. There are controls in place within this framework to ensure the technical standards of gaming	None required

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<b>Question 2) - Does the policy do enough to ensure gambling is conducted in a fair and open way?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
			equipment.	
GQU/0067	Anonymous Member of the public	If things are not conducted in a fair and open way will this not lead to other crimes/revenges possibly.	The Council accepts that there could be a link between the licensing objectives of 'ensuring gambling is conducted in a fair and open way' and the objective of 'preventing gambling from being a source of crime or disorder.' The Council will consider if any policy changes are required to implicitly make this link and suggest any potential control measures.	Pending
GQU/0092	Clifford Parish Council	11.2 "...Other information." Should be clarified. Also the action "...to communicate..." should also be followed up by what action is taken by the G.C in view of the Councils concerns.	The Council will consider the first point in respect of clarifying what is meant by 'other information' however in respect of the second point the Council would argue that this level of detail would be unsuitable for a policy statement especially as it extends to a third party.	Pending
GQU/0009	Anonymous Member of the public	Someone needs to ensure that gambling is conducted in a fair and open way - to protect vulnerable people being exploited. If it's not the local council who issues the licence, (can could withdraw or suspend it) and it must go to the police and face criminal investigation, which let's face it, is more costly and less likely to happen, then there is more chance of venues being less stringent in this area.	The Council notes guidance issued to Licensing Authorities from the Gambling Commission which states, "Generally the Commission would not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be a matter for either the management of the gambling business, and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence.	None required
GQU/0011	Anonymous sports centre	Statistical scrutiny of gaming events (roulette wheels) and financial payouts/profits	This would be a matter for the Gambling Commission. NB: The new regime brings in controls over the companies which manufacture gaming equipment. There are controls in place within this framework to	None required

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<b>Question 2) - Does the policy do enough to ensure gambling is conducted in a fair and open way?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
			ensure the technical standards of gaming equipment.	

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<b>Question 3a) - Does the policy do enough to protect children and the vulnerable from harm?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/0009	Anonymous Member of the public	Gambling is addictive and other countries with broader gambling laws show that vulnerable/poorer people and young people develop habits and lose income. There must be a proactive policy of supporting people to control their habit, reduced access to easy cash or credit once in the premises, and positive support from managers of premises, eg if someone asks to be banned from premises to prevent them coming back in when they feel vulnerable. These schemes should be promoted by the local Council since it's unlikely the companies themselves will be proactive.	Self barring schemes are already in existence in a number of premises and the DCMS is currently consulting on mandatory conditions related to the provision of ATMs on gambling premises. The Council will monitor developments in this area before making any necessary changes to the draft policy.	Pending
GQU/0017	Other business owner	Once people are hooked it is too late, its difficult to recover. Maybe make casinos hire staff with an understanding of psychology and addiction, to keep this under control.	This would be a matter for the Gambling Commission to consider however it is important to note that the application process for the new system of personal licences for key gambling personnel includes extensive checks into a persons identity, character, financial background, training,	None required

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<b>Question 3a) - Does the policy do enough to protect children and the vulnerable from harm?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
			and experience.	
GQU/0023	Gambling business	Raising the age of eligibility for the purchase of lottery tickets/scratchcards (ie. from 16 to 18)& liquor stores (ie. from 18-21) plus the exclusion of ATM machines to all licensed premises.	The first two points are outside the scope of the Gambling Act 2005. In regards to the third point the DCMS is currently consulting on mandatory conditions related to the provision of ATMs on gambling premises. The Council will monitor developments in this area before making any necessary changes to the draft policy.	Pending
GQU/0086	Faith group	It is the enforcing of conditions that is crucial to the protection of children and vulnerable persons.	The Council would reply that this goes without saying however the Council is bound to operate within the framework of better regulation which advocates a risk based approach to enforcement. The Council will in due course produce an enforcement protocol in conjunction with West Yorkshire Police and the other responsible authorities when the Act is brought into full effect which will expand further on enforcement principles and arrangements.	None required
GQU/0100	Otley Town Council	There should be door supervision, but the supervisors should be trained, and should be Security Industry Authority Licensed personnel. Cash Machines (ATMs) should not be allowed in any premises which are used for gambling, so as not to encourage people to spend more than they have.	The Council may have the power to apply conditions related to SIA registered door staff at certain premises however it is important to note that the Act does not allow the Licensing Authority to impose such conditions in respect of casinos or bingo clubs. In regards to the second point the DCMS is currently consulting on mandatory conditions related to the provision of ATMs on gambling premises. The Council will monitor developments in this area before making any necessary changes to the draft policy.	Pending

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<b>Question 3a) - Does the policy do enough to protect children and the vulnerable from harm?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/0012	Anonymous Member of the public	In addition premises should be constantly wardened and continuously policed to ensure young persons are not admitted. Also, citing should be well away from schools and colleges.	While the Council accepts the call for strong and effective regulation of the gaming industry, the Council is still bound to operate within the framework of better regulation which advocates a risk based approach to enforcement. The Council will in due course produce an enforcement protocol in conjunction with West Yorkshire Police and the other responsible authorities when the Act is brought into full effect which will expand further on enforcement principles and arrangements. With regards the second point, The Council acknowledges this suggestion and has undertaken in the draft policy to investigate location issues such as these at Para 13.9. Any blanket policy such as the one suggested here would however be outside the scope of the Act.	None required
GQU/0043	Anonymous Member of the public	There should be an expectation of conditions, not just “consideration”. Protecting children and the vulnerable should be a top priority.	The Council notes guidance issued to Licensing Authorities from the Gambling Commission which states, “Licensing authorities should bear in mind their duty to act in accordance with the principles set out at section 153 of the Act. Since they should aim to permit the use of premises for gambling, they should not attach conditions that limit the use of premises for gambling except where that is necessary as a result of the requirement to act: in accordance with this guidance, the Gambling Commission codes of practice or the licensing policy statement; or in a way that is reasonably consistent with the licensing objectives.” The Council would argue that the policy	None required

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<b>Question 3a) - Does the policy do enough to protect children and the vulnerable from harm?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
			statement in its current form reflects these requirements.	
GQU/0058	Anonymous Member of the public	Better and more visible presence of information on charities such as 'GamCare' for those vulnerable to gambling.	The Council notes this point and will be revisiting the sections in the draft policy which deal with the display of support information for problem gamblers, to see if any changes are required.	Pending
GQU/0029	Gambling business	Most problem gambling emulates from betting offices and yet FOBTs have mushroomed. This must be causing harm to vulnerable people.	The Council is aware that FOBT's in bookmakers do give rise to special concern and the Council will be reviewing this section of the policy to see if any extra control measures are required.	Pending

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<b>Question 3b) - What are your thoughts on our suggested approach regarding gaming machines?</b>				
<b>Respondent ID(s)</b>	<b>Type/Organisation</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/008	Member of the public	High stake machine centres should require membership schemes to prevent low income occasional gamblers access. Membership schemes should seek to protect members from financial hardship.	It is the Council's view that this would be an operational decision for the individual operator and any such control measure would be outside the scope of the Act. It is interesting to note that following the relaxation of membership requirements for casinos some casinos still operate membership schemes voluntarily.	None required
GQU/0009	Member of the public	If high stake machines are in the same vicinity but different areas, young people will manage to get in, and the higher stake machines become associated with 'adulthood' -	The Council notes this reply and will be reviewing all sections of the policy which cover this area to ensure the policy reflects the most up to date best practice in this regard.	Pending



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<b>Question 3b) - What are your thoughts on our suggested approach regarding gaming machines?</b>				
<b>Respondent ID(s)</b>	<b>Type/Organisation</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
		they should be in different locations altogether.		
GQU/0018 GQU/0023 GQU/0005 GQU/0012 GQU/0016 GQU/0082 GQU/0088 GQU/0025 GQU/0099	Various including members of the public and miscellaneous organisations	All of these respondents made representations asking that children should not be permitted to enter any premises which provide gaming machines whether low stake or otherwise.	While these comments are appreciated it is important to note that Leeds City Council has no power to restrict children playing Category D gaming machines, where the operator has the correct permit/licence, as this allowance is permitted by the Act.	None required
GQU/0100	Otley Town Council	"Family Entertainment Centres" must be considered to be exactly that. No child should be allowed unless in the care of a responsible adult. No unaccompanied children should be admitted at all, to prevent children, especially truants, congregating inside or outside the premises and causing disorder.	These suggestions are duly noted and will be considered.	Pending
GQU/0062	Member of the public (non anonymous)	Although I am not experienced in child or young person behaviour, I suggest that unlicensed FEM gaming machines could be operated by tokens bought on site from a responsible human vendor. This exercises control on use.	This suggestion is duly noted and will be considered.	Pending
GQU/0060	Member of the Public	It is impossible to tell who is a vulnerable adult or person so the existence of machines which give the illusion of a high reward will inevitably lead some people into spending more money than they have.	None required	None required

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<b>Question 3c) - Do you think the suggested policy related to location issues is needed?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/0018	Member of the public	Gambling should not be near any residential area whatsoever.	The Council acknowledges this suggestion and has undertaken in the draft policy to investigate location issues such as these at Para 13.9. Any blanket policy such as the one suggested here would however be outside the scope of the Act.	None required
GQU/0086	Faith Group	Whilst people of faith have to live within the legal framework of the country, sensitivity to faith concerns need to be taken into account in the siting of citywide projects. Consideration should be taken of particular density of faith demography in the city.	This comment will be forwarded to the relevant team within Development for their consideration including the team dealing with the large/regional casino bid.	None required
GQU/0085	Member of the public	If gambling is accepted as a legitimate entertainment and is reasonably regulated, it ought not be 'hidden away' from youngsters etc. It would be preferable if they were able to learn rather than be kept in ignorance. - There is a danger of being overly protective.	While it is acknowledged we are suggesting a policy which will investigate location issues, where relevant representations are received, we still expect that market forces will be the primary driver for the location of gambling businesses and a scenario will not unfold where gambling premises are routinely 'hidden away'.	None required
GQU/0025	Ward Councillor	Need definition of proximity.	This suggestion is duly noted and will be considered.	Pending - The policy could be updated to employ a statement similar to the one used in the Licensing Act eg. Proximity will be a matter of fact in the individual case.

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<b>Question 3d) - What are your thoughts on our suggested approach regarding assistance to vulnerable persons?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/0009	Member of the public	There needs to be a proactive outreach and it should be a condition of the license that someone on each premises should be responsible for monitoring possible vulnerable people, and supporting/referring them, obviously this will apply more to some premises than others. Is there any obligation for the Gambling Commission to fund a gambling charity?	While the Council acknowledges this useful suggestion we feel it would be extremely difficult to apply as a condition on a licence and would be thwart with legal difficulties. In addition such control measure would probably be outside the scope of the Council's licensing policy.	None required
GQU/0017	Other business owner	It's closing the door after the horse has bolted, people with addiction are not going to go to a government website for help, they probably will be out of control and unable to help themselves by then. You need to intervene early.	While the Council accepts that problem gamblers may not visit a council website to seek out support information, the provision of such information may also be of use to persons such as the family and friends of problem gamblers who may be more likely to visit a local authority site. This section of the policy will be thoroughly redrafted and the Council will consider various other means to promote this licensing objective accounting for the various suggestions made through the consultation process.	Pending
GQU/0086	Faith Group	Restrictive isn't the correct term- I do not want to be part of a police state but I think public authorities have a duty to publicise the potential dangers of gambling (as we do cigarettes and alcohol)as well as signposting to services that can support people. Monitoring of the increased use of	This suggestion is duly noted and will be considered.	Pending

Appendix 3 - Draft Gambling Policy – Key Consultation Messages **DRAFT**

<b>Question 3d) - What are your thoughts on our suggested approach regarding assistance to vulnerable persons?</b>				
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		such services needs to be undertaken in order to modify policy when and if necessary.		
GQU/0100	Otley Town Council	People with problems with gambling are unlikely to access the council website for assistance. The operator should encourage strategies for self-help and provide prominent information on organisations where advice and help can be sought, such as GamCare, Gamblers Anonymous, National Debt-line and Mencap.	While the Council accepts that problem gamblers may not visit a council website to seek out support information the provision of such information may also be of use to persons such as the family and friends of problem gamblers who may be more likely to visit a local authority site. This section of the policy will be thoroughly redrafted and the Council will consider various other means to promote this licensing objective accounting for the various suggestions made through the consultation process.	Pending
GQU/0012	Member of the public	As a “duty of care”, prospective gambling operators should recognise and eliminate risk before and during the visits. The onus will be on the operators.	None required	None required
GQU0016	Member of the public	Not too sure how this would prevent vulnerable people from gambling though.	This section of the policy will be thoroughly redrafted and the Council will consider various other means to promote this licensing objective accounting for the various suggestions made through the consultation process.	Pending
GQU/0021	Member of the public	Have a self-named non gambling list in operation in gambling establishments.	This suggestion is duly noted and will be considered.	Pending
GQU/0034	Member of the public	Proof of stable mind to be shown and evidence of economic state to afford to lose.	While the Council acknowledges this useful suggestion we feel it would be extremely difficult to apply as a condition on a licence and would be thwart with legal difficulties. In addition such control measure would	None required

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			probably be outside the scope of the Council's licensing policy.	
GQU/0048 GQU/0101	Member of public	Do not think problem gamblers will access a council website.	While the Council accepts that problem gamblers may not visit a council website to seek out support information the provision of such information may also be of use to persons such as the family and friends of problem gamblers who may be more likely to visit a local authority site. This section of the policy will be thoroughly redrafted and the Council will consider various other means to promote this licensing objective accounting for the various suggestions made through the consultation process.	Pending
GQU/0043	Member of the public	Information on support services needs to be on clear display on the premises in question, not just on council website.	This section of the policy will be thoroughly redrafted and the Council will consider various other means to promote this licensing objective accounting for the various suggestions made through the consultation process.	Pending
GQU/0060	Member of the public	There should be an obligation on gambling suppliers to assess the ability of the person to pay: analogous to the obligation of bar tenders not to serve someone who is drunk.	While the Council acknowledges this useful suggestion we feel it would be extremely difficult to apply as a condition on a licence and would be thwart with legal difficulties. In addition such control measure would probably be outside the scope of the Council's licensing policy.	None required
GQU/0029	Gambling Business	In casinos the display of Gamcare material is only mandatory as a result of membership of BCA. The council need to make it mandatory as a condition of getting a licence.	The Council plan to review the legislative framework and accompanying guidance documents from the GC and the DCMS to see what powers the LA has to invoke conditions in this regard. The Council will consider if any policy amendments are required following this exercise.	Pending

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<b>Question 3d) - What are your thoughts on our suggested approach regarding assistance to vulnerable persons?</b>				
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GQU/0054	Morley Town Council	Information regarding support services available in council offices and libraries.	This suggestion is duly noted and will be considered.	Pending
GQU/0092	Clifford Parish Council	Problem gamblers would not access support services as they are often in trouble before they realise the problem. Tight financial limits should be imposed on gamblers and the operators must ensure that they are adhered to.	This section of the policy will be thoroughly redrafted and the Council will consider various other means to promote this licensing objective accounting for the various suggestions made through the consultation process.	Pending
GQU/0089	Other business owner	Vulnerable people or those with mental impairment are not likely to look for information on the website.	This section of the policy will be thoroughly redrafted and the Council will consider various other means to promote this licensing objective accounting for the various suggestions made through the consultation process.	Pending
GQU/0099	Religious Body	Because gambling is addictive every person who gambles is a vulnerable person.	None required	None required

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<b>Question 3e) - Are there any other categories of person(s) who you feel we should mention in the policy who fall under the category of vulnerable?</b>				
<b>Respondent ID(s)</b>	<b>Type</b>	<b>Comments made / summary of comments</b>	<b>Reply</b>	<b>Policy Changes</b>
GQU/0009	Member of the public	people with learning disabilities, people with poor mental health or a mental illness (eg depression), people who may be able to make informed decisions but for whom gambling provides something else fundamental	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending

Appendix 3 - Draft Gambling Policy – Key Consultation Messages **DRAFT**

<b>Question 3e) - Are there any other categories of person(s) who you feel we should mention in the policy who fall under the category of vulnerable?</b>				
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		eg depressed people who's social activity is gambling and may need support for that issue rather than 'problem' gambling		
GQU/0018	Member of the public	Mental illness or learning disability	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending
GQU/0012	Member of the public	Elderly, especially woman, ethnic minorities.	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending
GQU/0043	Member of the public	People under stress in their lives, particularly those with large debts.	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending
GQU/0067	Member of the public	People with mental illness or people on medication that may effect their judgement.	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending
GQU/0070	Members only club	Anyone who may not understand our language such as anyone who has recently come to live in our country.	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending
GQU/0089	Other business owner	The people who are most likely to gamble foolishly are those who are impoverished because they don't know how to manage money and see gambling as an easy way out of financial difficulties.	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending
GQU/0088	Other business owner	Mentally deficient adults, those with learning disabilities who may not understand the consequences of their actions.	These suggested additions will be duly considered during a thorough redraft of the policy.	Pending