

Summary of Consultation Submissions and Licensing Authority Policy Response.

1. Introduction

1.1 The Licensing Authority consulted on its intention to publish a new Statement of Principles for Gambling in Westminster for 9 weeks between 27 September and 28 November 2021. During the consultation period the Licensing Authority received 12 responses from a total of 25 organisations (including some joint responses). These organisations made up:

- 12 Gambling Operators
- 8 Business Improvement Districts
- 3 Representative organisations
- 1 Amenity Society
- 1 other organisation (Citizen's Advice Bureau)

1.2 The responses were detailed and thorough. The points that were raised relating to Gambling Risk Assessments, Licensing Objectives, Core Hours and Spatial Policies are summarised below.

1.3 The organisations not representing the gambling industry were generally supportive of all of the proposals in the draft statement of principles. Submissions from the industry (operators and representative organisations) raised more significant issues and made more detailed requests for changes.

2. Key points raised and the proposed policy approach

2.1 The key points raised in the submissions are summarised below alongside the approach taken based on these submissions.

Local Area Profile, Gambling Vulnerability Zones, Hots Spots and Betting Clusters

2.2 The responses to the consultation on the LAP largely focussed on the methodology and data used. There were some comments that are better addressed in the Statement of Principles for Gambling in Westminster. The points that were raised across all of the responses were.

- That the LAP included assumptions not supported by evidence
- The some of the data was about gambling activities not regulated by the Licensing authority (e.g. scratch cards)
- The LAP does not outline the positive contribution that gambling makes to Westminster.
- That some of the findings and evidence in the LAP (including the location of gambling vulnerability zones) does not relate to specific premises within Westminster
- That the data and research used for the LAP was out of date.
- The size of the Gambling vulnerability zones were too large and the use of buffer zones unnecessary.
- That the LAP was in not in line with the Regulator's Code

- That premises inside a GVZ would not be able to compete with premises outside of a GVZ and would be subject to an unreasonable additional burden.
- 2.2 In response to the comments we have made revisions to the LAP. These amendments include making it clear that the methodology used was based on the 2016 Geofutures study, but that the data used is from up to date data sets and better identifying the sources sets used.
- 2.3 We have also included more detail on the research and evidence that underpins the assumptions in the report. The LAP in some cases references gambling activity that is not regulated by the Licensing Authority, where this is the case we have clarified that it is included because of the interrelated risk with the activities that the Licensing Authority does regulate. For example, in the section on young people we provide more detail on the evidence that young people who take part in online gambling can turn to gambling in physical spaces to satisfy their gambling urges.
- 2.4 Some of the comments on the LAP are better addressed in the upcoming the revised Statement of Principles for Gambling in Westminster. For example, the Gambling Vulnerability Zones are based on the methodology and data we have identified and are therefore included on the LAP, which is not itself a policy document. The decision around whether or not to apply specific policies to these areas (or all of these areas in relation to the comments regarding their size) is better addressed in the revised Statement of Principles for Gambling in Westminster.
- 2.5 The LAP is a tool designed to identify the risk of gambling related harm in Westminster to individuals. Therefore we have not included data on the potential economic contribution that gambling makes to Westminster. Similarly, the LAP does not consider the potential impact on venues of policies which might be based on the LAP's findings.
- 2.6 Following the publication of the draft LAP additional data sets on the location of become available on the locations of rough sleeping hotspots. It is important to acknowledge the locations of these rough sleeping hotspots in relation to the risk of gambling related harm, particularly as the locations highlighted above are relatively established. However, these are not included in the Vulnerability Index calculations due to the transient nature of people sleeping rough, seasonal patterns, changes in migration or in the built environment. Additionally, Westminster has a high number of rough sleepers who do not originally come from the borough nor receive support from organisations within it, which would help to define the vulnerability of the area since the individuals would be expected to attend those locations more regularly. This is why hostels and other organisations offering support have been integrated into the Vulnerability Index, but not rough sleeping 'hotspots' and soup kitchens, which are only attended for a specific and short period of time in an irregular pattern.

General issues raised

- 2.7 The points that were raised across all of the responses were.
- This policy conflicts with the aim to permit principle.
 - That there is a lot of duplication with other regulatory schemes (e.g. LCCP)
 - That evidence is out of date, flawed or not provided
 - That a lot of the policy considerations are too prescriptive.

- The authority's analysis fails to reflect the fact that the estimated prevalence rate of 'problem gambling' in Great Britain is in decline
- Reassurance is sought from the Licensing Authority that the operating and opening hours of existing operators cannot be challenged under the proposed new policy.
- The policy makes reference to applications which will “not adversely impact the licensing objectives”. This should be “reasonably consistent” with the licensing objectives.
- The Licensing Authority’s approach to the imposition of conditions on premises licences would be assisted by a clear statement that all Gambling Act 2005 premises licences are subject to mandatory and default conditions which are usually sufficient.
- Policies, procedures, and mitigation measures to ensure consistency with the licensing objectives should be dealt with via the risk assessment rather than licence conditions.
- The draft does not comply with the principles set out in the Regulators’ Code.
- The new policy proposals make specific reference to matters which do not fall within the promotion of the licensing objectives for example: operator duties under The Equality Act.

2.8 A large number of these points are addressed in the relevant policy sections below. On a general note the Council did intend to increase the amount of detail associated with its policy approach to gambling within this policy. This has created a significantly larger Policy document than the existing Policy. Officers have discussed our approach relating to the level of detail within the proposed new Policy with some respondents who raised this point. The explanation for the increase in the size and content of the Policy is because the Policy is an extremely important tool for Licensing Authority, responsible authorities, residents, and gambling operators and therefore should set out the full expectations and requirements that the Licensing Authority will have regard to when considering applications.

2.9 The Policy provides greater detail than before and provides specific requirements that operators must meet. It is accepted that with this approach there will be some duplication of the requirements under the Codes of Practice and Licensing Authority Guidance issued by the Gambling Commission. In our view this emphasises that those elements that are duplicated are key areas of consideration.

2.10 Officers do not believe that the proposed Policy is against the provisions of the Regulators Codes. However, this is being reviewed with legal over the next week as it could form part of any legal challenge.

2.11 With regard to some of the responses, particularly from the gambling industry that the new Policy conflicts with Section 153 (aim to permit) of the Act, the Council has an alternative interpretation of the “aim to permit” principle and believes that the Licensing Authority has the right under this section to include specific policies within its Policy that address key issues and risks and that the aim to permit is subject to these policies. Generally, our policy approach is to aim to permit gambling. However, some policies did, in certain limited circumstances set out where the Licensing Authority would have a policy to refuse applications unless an applicant can provide suitable mitigation and reasoning to prove an exception. The responses received during the consultation phase and through further conversations with some respondents following the close of consultation a further review of our policy approach to refuse was undertaken. The Council is committed to having a robust policy and with that in mind the policy needs to establish the areas where there are

concerns and what the expectation within the policy is upon the applicant. The review considered our proposed policy, what the interpretation of the law is with regard to aim to permit and the risk of legal challenge.

2.12 In response to the respondents' comments and further legal review of the policy we propose to:

1. To amend any policies that set out a presumption to refuse so that it was clear that the policy approach will be to aim to permit. However, we have caveated the policy that although our policy approach will be to aim to permit, none the less the Licensing Authority may refuse applications that do not meet the relevant policies or meet the relevant licensing objectives. The main policies that this applied to was the Hours Policy E1, Gambling Vulnerability Zone Policy F2 and Betting Cluster Policy F3. References to the previous policy approach for these policies within the premises use policies has also been amended to remove the references to these policies.
2. It is proposed to make some amendments to policies which are set out under the relevant policy headings below.

Gambling Risk Assessment Policy

2.13 The points that were raised across all of the responses were.

- This policy is over prescriptive, unnecessarily long and duplicates the requirements under the Codes of Practice.
- The policy seems to require that applicants must use the Council's risk assessment template

2.14 The Risk Assessment Policy sets out the Licensing Authority's expectations on what operators should include in their local premises risk assessments to meet the Gambling Commissions Codes of Practice. This policy is necessary to ensure that operators understand the expectation and triggers that will warrant a change to the premises local area risk assessment. As the Council's new Policy approach is predominantly based on assessing the applicant's operation and associated risks to the Licensing Objectives, the applicant/operators risk assessment document is an essential tool in demonstrating that the applicant will meet the relevant policies and the requirements of the Act.

2.15 In response to the responses received during consultation it is proposed to amend this policy to:

1. Slightly amend this policy to make it clear that applicants can use their own risk assessment template if they wish, and that the Council's risk assessment template is available to use if they wish.

Licensing Objective Policy – crime and disorder

2.16 The points that were raised across all of the responses were.

- There should be more clarity on the purpose of the counter-terrorism considerations and where specific responsibilities lie.
- There were comments that counter-terrorism should not be a consideration in the policy.
- The draft policy is not based on evidence that existing AGCs within Westminster are a concern.

- 2.17 The Metropolitan Police Service has made Counter-Terrorism considerations for business a point of emphasis. The Police have asked the Council to consider adding Counter-Terrorism to their policies so that licensed businesses understand the need to assess this risk and take appropriate action. However, the Police do not intend for the Licensing Authority to get involved with assessing any counter-terrorism risk assessments, nor do they want applicants to submit these risk assessments with their applications. The assessment of terrorism risk assessments is a matter for the police. If the police do have any concerns with the likely risk for that premises, they will engage with the business directly. Only if they are not cooperating with the police may the police consider using this regime to ensure suitable measures are put in place.
- 2.18 Following conversations with some respondents by officers it was clear that they felt the requirements of the draft policy, as worded was extremely onerous on businesses which were unlikely to have large numbers of people present and were unlikely to generate any risk associated with terrorism. They did accept that as a business they would look at the likely risk depending on where they were located within the city and the type of operation they were running. Any discussions relating to Counterterrorism would be between the business and the police.
- 2.19 In response to the responses receive during the consultation period and following officer discussions it is proposed to:
1. Amend the Counter-Terrorism section of this policy to remove it as a key consideration to whether the applicant will meet this policy and the relevant licensing objective. The Counter-Terrorism element will remain in the policy but rather than these being a specific consideration to whether the applicant meets this policy it will be reworded so that it states that applicants are encouraged to undertake a terrorism threat risk assessment and provide staff with counter-terrorism training if deemed necessary. The Police will engage directly with potential at risk venues or premises in locations that have been assessed as at risk.

Licensing Objective Policy – fair and open

- 2.20 The points that were raised across all of the responses were:
- That this licensing objective should not be included in the policy as it is an issue for the gambling commission
- 2.21 The Licensing Authority disagrees that this policy should be removed. The Licensing Objectives are a key consideration when considering premises-based applications. Although we agree that the Fair and Open objective is less likely to be a key issue for the Licensing Authority it is still a relevant consideration.
- 2.22 In response to the responses received during the consultation period officers do not propose to make any key changes to this policy.

Licensing Objective Policy – protecting children and vulnerable people from harm

- 2.23 The points that were raised across all of the responses were:
- Child Sexual Exploitation does not fall within the ambit of this Licensing Objective or Act and accordingly should not be included in this Policy.
 - The policy is too wide as it relates to harm not caused by gambling.

- Clarification has been sought on the requirements for assessing ‘cognitive capacity to gamble’
 - The requirement that applicants have policies for establishing the means to which a person can afford to gamble is onerous.
 - There is no formal ‘duty of care’ requirement placed on Gambling Operators to protect children and other vulnerable people.
 - Operators have no jurisdiction outside their premises and have no ability to interact with these individuals and requiring them to do so is not reasonable.
- 2.24 Officers have met with a number of respondents that made submissions specifically associated with this policy. The primary issues were the inclusion of an extremely detailed and prescriptive policy approach associated with safeguarding children, child sexual exploitation and other vulnerable adults. Whilst all the respondents that officers met with agreed that these are important issues and one for society as a whole to address, the inclusion of the specific criteria within the policy was, in their view beyond the scope of gambling regulation and this licensing objective.
- 2.25 Officers have since undertaken a further review of this policy, and specifically the elements that have generated the adverse responses.
- 2.26 In response to the respondents during the consultation period and via further discussions with officers it is proposed amend this policy to:
1. Remove the detailed criteria within the policy on operators associated with safeguarding children and child sexual exploitation.
 2. Retain the requirement that gambling operators need to consider and put forward suitable controls to ensure that safeguarding both children and adults is a key consideration to meeting this licensing objective.
 3. Within the reasons for the policy further clarification on the Licensing Authority’s expectations on this objective and to acknowledge that there are differences in approaches by operators who must restrict access to their venue or activity by law and those that permit child access.

Hours Policy

- 2.27 The points that were raised across all of the responses were:
- This proposed policy represents an additional restriction on trade beyond the existing gambling policy for new casinos or casinos who wish to move premises.
 - The act does not set hours for AGCs so it is not for the Licensing Authority to do so. The draft suggests that the hours referred to in the Byelaw for AGCs and FECs are those that are set out in Regulations passed under the Act – that is not the case.
 - There was no evidence provided to justify the hours included within the policy or a presumption to refuse based on them.
 - Any restriction on Bingo operators opening 24 hours and providing gaming machines permission must be justified.
 - The proposal that new/varied casinos may be forced to close their doors at 0600 will lead to larger than normal volumes of customers exiting onto streets at a specific unsocial time.
- 2.28 There has been concern, predominantly for the gambling industry over the introduction of an hours policy similar to the one in the Council’s Licensing Act 2003 Licensing Policy.

Operators argued that the introduction of an hour's policy with a presumption to refuse applications outside of those hours within a GVZ was contradictory to S153 of the Act (aim to permit), was not based on evidence and was unnecessary.

- 2.29 The Casino sector raised specific concerns that due to the restricted number of casino premises licences within Westminster and that new Casino licences cannot be permitted the hours policy would only relate to premises that vary their licenses to move their premises licence from their current premises to a new premises or where a premises, which didn't have a 24 hour licence would seek to increase their hours. Currently nearly all casinos within Westminster are 24 hours and casinos felt that the Policy would reduce their permitted hours if they had to move premises, which in some cases the move was beyond their control, e.g. redevelopment of site or landlord requirement.
- 2.30 Submissions were received relating to the hours specified within the Council's Pleasure Fairs (Amusement Premises) Byelaws. A separate Briefing Note has been provided to the Cabinet Member associated with this Byelaw and particularly relating to the operating hours of Adult Gaming Centres (AGC), Family Entertainment Centres (FEC) and unlicensed Family Entertainment Centres (uFEC).
- 2.31 The purpose of the Hours Policy is to set an appropriate hour for gambling premises, having regard to the wider issues across Westminster at night and with the risk associated with operating late at night with wider gambling harms. The policy approach will mean that applicants outside a Gambling Vulnerability Zone will generally be granted to the hours set within this policy, subject to other policies within the Statement. Any applications for hours beyond these hours will be considered on their own merits.
- 2.32 For premises within a Gambling Vulnerability Zone, applications up to the hours specified within the Policy, subject to the applicant meeting the other policies within the Statement would be permitted. The draft policy that was consulted upon stated that applicants who apply for hours beyond the specified Hours within a Gambling Vulnerability Zone will generally be refused unless the applicant can provide sufficient reasons and risk mitigation to satisfy the Licensing Authority that they should be an exception to policy. This element was of significant concern to industry respondents, and they stated that this was in conflict with s153 of the Act and unlawful.
- 2.33 In response to respondents during the consultation period and from discussions with officers it is proposed to:
1. Casino's will have an Hours policy permitting the operation of gambling activities up to 24 hours a day. This reflects the current position within Westminster's Casino premises and those casinos are unique in that licence numbers are restricted and that the operation of the casino is restricted to Westminster.
 2. Casinos that vary to move their licence from one premises to another within Westminster to the same hours will be considered under other policies within the policy document and applicants will need to demonstrate that the operation of those hours will not adversely impact the licensing objectives.
 3. Make no changes at this time to the Clause relating to the Byelaw Hours for AGC, FEC and uFEC until the relevant Cabinet Members have provided a view and steer on the Council's approach to enforcing this Byelaw. However, there will be a reference to the ability for such operators to submit, under a different process a request to amend the byelaw hours.

4. Amend any reference within the policy where the Authority's Policy is to refuse to the Authority will aim to permit but none the less may refuse an application within a gambling vulnerability zone that seeks hours later than those set out within this policy unless sufficient reasons and risk mitigation have been provided and the Licensing Authority is satisfied that the application should be granted in accordance with the Gambling Commissions Codes of Practice and Guidance to Licensing Authorities, that it is reasonably consistent with the Licensing Objectives and that it meets all matters identified within this policy and any other policies within the Council's Statement of Principles for Gambling.

Location Policy

- 2.34 The points that were raised across all of the responses were:
- There should be a presumption to refuse applications within the close proximity to an identified gambling vulnerability hot spot and / or designated Gambling Vulnerability Zone.
 - The Authority's location policy makes no reference to evidence of the operation of existing gambling premises.
- 2.35 The Location Policy sets out the Council's policy approach for premises that are located outside a Gambling Vulnerability Zone. It requires applicants to assess the Council's Local Area Profile (LAP) when developing their risk assessments. The policy does not make reference to existing gambling premises as these are not a key consideration to the application. The key risk approach established with this policy relates to the at-risk groups and venues in the area. There are no intentions to include, within the policy to the operation of other gambling premises.
- 2.36 This policy has established buffer zones around the Gambling Vulnerability Zones (GVZ) and specific hotspots associated with at risk premises outside the GVZ. The policy has not set a presumption to refuse as applications within a buffer or hot spot will need to be considered on their own merits and how the operator will specifically mitigate the local risks. It is not intended to amend this policy to include a presumption to refuse for applications within proximity to a GVZ or in a hotspot.
- 2.37 In response to response to the respondents comments we propose to make the following amendments to the policy:
1. The current wording of the policy refers to applications being within close proximity to a GVZ or Hotspot but does not make it clear that applications that are within a hotspot are also covered by this policy. This will be a very minor amendment and ensure that the policy is correctly applied to the relevant applications.
 2. The Council will not add a policy of refusal for any applications within close proximity to a gambling vulnerability hot spot and/or a designated Gambling Vulnerability Zone.

Gambling Vulnerability Zone

- 2.38 The points that were raised across all of the responses were:
- The Gambling Vulnerability Zones Policy should not be used as a means of WCC refusing applications.

- The suggestion that applicants must consider “additional measures” cannot be a proper starting point. This would clearly depend on what the applicant’s normal measures were.
- The GVZ areas take up nearly 50% of Westminster.

2.39 The GVZ Policy has been developed from the evidence presented in the LAP. The areas identified as GVZ for the purpose of this policy are the areas identified within the LAP as areas that were in the higher levels of risk within the Gambling Vulnerability Risk Index model for the City. Therefore, the Council believes that it is right and reasonable that it identifies these areas for a special policy within the Statement.

2.40 The policy is not intended to be used as a way of refusing applications, although if applicants do not meet its requirements the Licensing Authority may determine not to grant an application. Officers met with some respondents and discussed the GVZ policy at length. The policy required applicants to put forward suitable and sufficient control measures that were above that which would normally be expected for similar applications outside the GVZ. The intention was to make it clear that the Licensing Authority would expect applicants within a GVZ to have greater mitigation to address the potential risks in the GVZ and that this would and should be above that provided by a premises outside of the zone. However, following discussions with some respondents, officers accept that the wording of this element of the policy assumes automatically that the current mitigation proposed, or which is already in place by the operator is not sufficient. This would not meet the general policy approach that operators are expected to assess the risk and set out their mitigation to address it. It may be, in some circumstances that the operators normal operating process may be adequate mitigation or controls for those risks.

2.41 In response to the respondents comments we propose to amend the policy to:

1. Amend policy B.3. to remove the reference to providing suitable and sufficient control measures that are above those which would normally be expected for a similar application outside a designated GVZ so it will require the applicant to instead put forward suitable and sufficient control measures that will specifically address and mitigate the risks identified by the Council within the Gambling Vulnerability Zone. Officers believe that this amendment will still achieve the aim of the policy. Officers will also make amendments to paragraph F2.9 under the reasons for the policy to reflect this change.
2. Clause C of the policy currently duplicates the policy approach for the Hours Policy in that it is the Licensing Authority’s policy to refuse applications that are outside the specified Hours. However, the current wording of this clause of the policy does not include the additional element that is contained within the Hours Policy relating to this. It is proposed to include the caveat that if an applicant can provide sufficient reasons and risk mitigation to satisfy the Licensing Authority that they should be treated as an exception to this policy and that of the Hours Policy.
3. Amend any reference within the policy where the Authority’s Policy is to refuse to the Authority will aim to permit but none the less may refuse an application that seeks to provide gambling facilities within a gambling vulnerability zone unless sufficient reasons and risk mitigation have been provided and the Licensing Authority is satisfied that the application should be granted in accordance with the Gambling Commissions Codes of Practice and Guidance to Licensing Authorities, that it is reasonably consistent with the Licensing Objectives and that it meets all matters identified within this policy and any other policies within the Council’s Statement of

Principles for Gambling. Officers believe that this alternative wording may reduce the risk of challenge as it won't provide a definite policy presumption of refusal. However, this change will still provide the Licensing Authority with the policy to refuse if they don't meet the requirement to prove an exception.

Betting Premises Clusters

- 2.42 The points that were raised across all of the responses were:
- The suggestion that the reduction in maximum stake on machines in betting shops has had no effect on risk is unsupported.
 - No reasoning is provided to explain the decision that a Betting Premises Cluster should be three or more betting shops located within 200 metres of each other.
 - The evidence basis for this policy is old and pre-dates the change in maximum stake for B2 gaming machines.
 - This policy is in direct conflict with Section 153 of the Act (Aim to permit).
- 2.43 This policy was intended to address the concerns that clusters of betting shops can have a detrimental impact on vulnerable people living in close proximity to these clusters. The evidence basis for this policy was from a study conducted by Geofutures in 2016. That study identified, from limited customer play data provided by some betting operators that rates of problem gambling was higher to customers of betting premises within a cluster who lived within 200m were more likely to be at risk of at risk and problem gambling.
- 2.44 This policy was produced to specifically address local concerns associated with the clustering of betting shops. It is important to note that there has been nearly a 50% reduction in gambling premises within Westminster since the stake on B2 gaming machines was reduced by the Government.
- 2.45 Officers have considered the responses, the evidence base that was used to support this policy and the responses from the public consultation. The evidence base for this policy is older than is considered reliable for the purposes of the introduction of a policy like this. There is a risk that if this policy approach was maintained that it would be legally challenged. The methodology that this policy is based on did predate the changes to the stakes and prizes for B2 (FOBT) gaming machines. Due to the significant risk of challenge due to the aging evidence base and that there has been a significant reduction in betting premises across the City since the change in law relating to the maximum stake this policy has been removed from the final draft. Other location policies, combined with the premises use and licensing objectives policy should provide sufficient requirements to enable the Licensing Authority to consider applications as to whether they would impact upon vulnerable people.
- 2.46 In response to the respondents' comments we have removed this policy from the new Gambling Policy.

Premises Use, Permits and Notification Policies

- 2.47 The general comments relating to premises use policies have been around duplication of other requirements on operators, for example within the Codes or Practice, Guidance to Licensing Authorities, etc. There were also significant views from gambling operators that the policies were extremely detailed and seem to be excessive in the level of detail they go into. However, there were very little to no comments made on the policies associated with other permissions relating to permits, notifications, or registrations.

- 2.48 Officers have considered the general responses following consultation and have had a number of conversations with some respondents, predominantly from the gambling sector. Whilst we appreciate that the new policy approach is significantly more detailed than our current policy and any other Local Authority policy, we feel that such detail is necessary for such an important policy.
- 2.49 The Gambling Policy is a fundamental document in determining applications and is one of the key considerations under section 153 of the Act for permitting premises licence applications. Therefore, we have included a level of detail within this policy that will assist in the application phase and ensure that operators, residents, and responsible authorities are fully aware of the expectations and policy approach relating to certain key points that need to be considered in any application. The policy is intended to be used as a tool for not only applicants but residents and responsible authorities. The policy is intended to provide information on the other elements of consideration which may in some ways duplicate points within the Codes of Practice and Guidance. This purely emphasises that these points are significant considerations and that the Licensing Authority will therefore want applicants to specifically address these.
- 2.50 In response to the general comments from the consultation responses and those made during discussions with officers and respondents the following amendments will be made to the policy:
1. All of the policies within the proposed policy will be retained. However, there will be some amendments made to the wording of these policies which are set out below.
 2. Within the Casino Premises Policy G1-A, Bingo Policy G2-A, Bingo Premises Policy G2-A, Betting Shop Policy G3-2A any references to the previous wording of the hours policy and the presumption to refuse if hours were beyond the hours set within that policy have been removed. The policy now will just refer to the applicant meeting the hours policy in the same way that they are for the licensing objective and spatial policies.
 3. The policy approach in the Casino Non-Gambling Areas Policy G1-G that applications will be refused if they do not need the requirements in this policy associated with non-gambling areas has been removed and replaced with the Licensing Authority's aim to permit the applications but may, none the less refuse applications that do not meet this policy unless it believes that in granting the application it will be in accordance with the Act, regulations and relevant codes of practice, guidance to licensing authorities and the licensing objectives.
 4. Bingo Premises Door Supervision and Security Personnel Provisions Policy G2-J has been amended to make it clear when Security Industry Authority licensed door supervisors or security personnel are required and when such personnel do not need to be licensed.
 5. Betting Shop Policy G3-2A will also be amended to remove specific reference to the Betting Cluster policy as this policy has been removed.
 6. References to securing or weighting gaming machine stools and the remote disablement of gaming machines within all of the premises use policies has been removed and the expectation is that the operator would assess the risk associated with crime and the use of any furniture to commit any crime on the premises. However, due to the higher risk of the use of gaming machine stools and chairs as

tools to commit crime this policy approach is being retained for betting premises only.

7. Under the policies that refer to premises-based advertising a further clarification has been made under the reasons for this policy explains that the operators must meet the Advertising Standards Agency Code of Practice and Industry Group for Responsible Gambling code. The focus of this policy is on local premises and advertising within the city in close proximity to sensitive buildings or within identified vulnerable areas.
8. Some other minor changes to wording to ensure consistency between policies and to correct minor errors have been made but these are minor and make no substantial changes to the policy or its approach.