

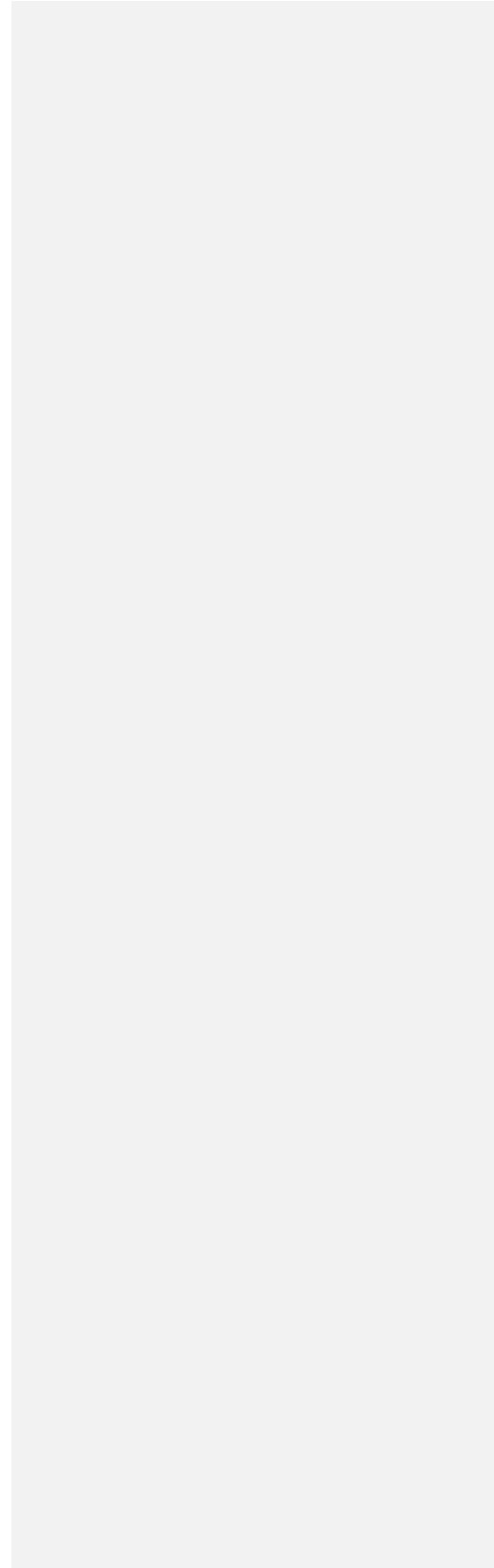
Appendix 1



**GAMBLING ACT 2005
STATEMENT OF POLICY and PRINCIPLES
2025-2028**

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GLOSSARY OF TERMS

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

Licensing Objectives	As defined in section 3.1 below
Licensing Authority	London Borough of Wandsworth
Licences	As stated in section 4.1 below
Applications	Applications for licences and permits as defined in Section 4.1 below
Notifications	Means notification of temporary and occasional use notices
Act	The Gambling Act 2005 (as amended)
Regulations	Regulations made under the Gambling Act 2005
Premises	Any place, including a vehicle, vessel or moveable structure
Code of Practice	Means any relevant code of practice made under section 24 of the Gambling Act 2005
Mandatory Condition	Means a specified condition provided by regulations to be attached to a licence
Default Condition	Means a specified condition provided by regulations to be attached to a licence, unless excluded by the Council
Provisional Statement	Means an application made prior to construction or extensive building work is undertaken to ascertain whether the grant of a licence is likely.
Responsible Authority	<p>For the purposes of this Act, the following are responsible authorities in relation to premises:</p> <ol style="list-style-type: none"> 1. The London Borough Of Wandsworth; 2. The Gambling Commission; 3. Metropolitan Police 4. Planning Department 5. Environmental Protection (the authority which has functions in relation to pollution of the environment or harm to human health) 6. Wandsworth Local Safeguarding Children Board (LSCB) & LBW's Safeguarding Adults Service. 7. HM Revenue and Customs.

	<p>8. The London Fire Authority; and</p> <p>9. Any other person prescribed in regulations made by the Secretary of State</p>
<p>Interested Party</p>	<p>For the purposes of this Act, a person is an interested party in relation to a premises licence if, in the opinion of the Licensing Authority which issues the licence or to which the application is made, that person:</p> <ul style="list-style-type: none"> a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities; b) Has business interests that might be affected by the authorised activities; c) Represents persons who satisfy a) or b) above.
<p>Local Area Profile</p>	<p>Operators of gambling premises are required to assess the local risks to the licensing objectives posed by the provisions of gambling facilities at each of their premises and have policies, procedures and control measures to mitigate those risks. In order to assist operators in drawing up their risk assessments Licensing Authorities can provide information on the profile of their borough including location of e.g. schools, addiction rehabilitation centres, money lenders and pawn shops, gambling premises as well as deprivation indices and crime figures for the borough broken down by area. The Local Area Profile document is designed to assist operators when completing their risk assessments to allow them to address identified local risks.</p>

Executive Summary

The Gambling Act 2005 obtained Royal Assent in 2005 and came into effect in 2007.

Under Section 349 of the Gambling Act 2005, London Borough of Wandsworth as a Licensing Authority ("The Authority") is required to publish a Statement of Principles that it proposes to apply when exercising its functions under the Act. This Statement must be published at least every three years starting from 31 January 2007. The statement may also be reviewed from "time to time" in response to emerging risks.

The purpose of the Statement of Principles is to set out the principles that the Authority propose to apply when exercising its functions under the Act. The Council is referring to its statement of principles as its' Gambling Policy and will be referred to throughout this document as "the Policy".

In accordance with Section 153 of the Act, any decision taken by the Authority in regard to determination of licences, permits and registrations should aim to permit the use of premises for gambling in so far as it is reasonably consistent with the licensing objectives which are:

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

The principles to be applied specifically to the determination of premises licence applications include definition of premises, supervision of gaming machines and controlling where gaming machines may be located, location, layout of the premises, local risk assessments and consideration of local area profiles, duplication with other regulatory regimes, promotion of the licensing objectives, licence conditions and door supervision. The policy also specifically mentions adult gaming centres, family entertainment centres, casinos, bingo premises, betting premises, tracks and travelling fairs.

The Council is responsible for issuing permits for prize gaming and unlicensed family entertainment centres. The Council is able to specify the information it requires as part of the application process which will aid determination and this information is described in this Policy.

Club Gaming and Club Machine Permits are also issued by the Council. The process for this is described, along with other processes specified in the legislation for example Temporary Use Notices, Occasional Use Notices and Small Society Lotteries.

Enforcement of the legislation is a requirement of the Act that is undertaken by the Council in conjunction with the Gambling Commission. The Policy describes the Council's enforcement principles and the principles underpinning the right of review.

The Policy will not override the rights of any person to make an application and to have it considered on its individual merits.

The Policy has seven appendices, showing the map of the borough, scheme of delegation, risk assessment guidance, local area profiles, a summary of machine provisions by premises, gaming machine categories and definitions under the Gambling Act 2005, the list of Responsible Authorities under the Gambling Act 2005, advice on signposting and customer interactions for operators.

1 Introduction

- 1.1 Wandsworth Council is the Licensing Authority under the Gambling Act 2005 (the "Act"), responsible for the processing of premises licences, permits, lottery registrations and temporary and occasional use notices for Gambling activities within the Borough.
- 1.2 Section 349 of the Act requires the Licensing Authority to draft, consult on and publish a statement of principles that they propose to apply in exercising their functions under the Act. Once published the Statement will be kept under review and, in any case, will be re-published every three years. The first statement of Principles was published in January 2007. This is the 7th Statement published by this Authority and is for the period 2025 – 2028.
- 1.3 In producing its statement, this Licensing Authority declares that it has had regard to the licensing objectives under the Act, the guidance issued by the Gambling Commission (published 1 April 2021) and the final statement will have regard to any responses from those consulted on the statement.
- 1.4 Once adopted, the Gambling Policy will be made available on Wandsworth website at www.wandsworth.gov.uk
- 1.5 A consultation on this policy took place take place between XX July and XX September 2024 (10 weeks).
- 1.6 Notwithstanding this policy statement, each application received will be considered on its own merits, subject to the provisions of the Act, associated and subordinate legislation, and common law

2 Profile of the Borough

- 2.1 The Borough of Wandsworth occupies an area of 34 square kilometres (3,426 hectares), stretching from Vauxhall in the east to the edge of Richmond Park in the west. It is bordered by the boroughs of Westminster, Kensington and Chelsea, Lambeth, Merton, Hammersmith and Fulham and Richmond upon Thames. The Borough is largely residential with an estimated resident population of 327,506 in 2021 census. The Borough population grew by 20,505 residents from 2011 to 2021. Since the last Census, Wandsworth population has increased by +6.7%. The previous increase between 2001 and 2011 was +17.9%. More than half of population increase in Wandsworth came from just 4 wards - Nine Elms, St Mary's, Wandsworth Town and Thamesfield wards. Wandsworth is the 10th most densely populated local authority in London with 9,559 persons per km², but the second least densely populated in Inner London. Wandsworth remains as the 8th largest borough in London; it is the 2nd largest borough in Inner London (after Newham).
- 2.2 The age structure of residents differs significantly from both the national and the Greater London average. Wandsworth is a popular place to live among young adults. Wandsworth currently has the 3rd highest percentage of 20- 44-year-olds in London (50%). 5% of the population are under the age of 19 and 16% over the age of 65. 2021 census showed the biggest increase in 45-64 age group with a +25% increase (Since 2011), indicating that the population is getting older. Wandsworth is a multi-racial Borough with 67.8% of the population White British and overall the Black, Asian and ethnic minority population has increased by +3.6% points since 2011 to 32.2%. In 2021,

62% (203,322) of residents in Wandsworth were born in the UK compared to 65% in 2011. The proportion of non-UK born residents increased to 38% (124,184) since 2011.

2.3 Because of the density of residential population there are very few areas within Wandsworth that could be described as solely commercial or shopping areas. There are six town centres (Clapham Junction and Battersea, Putney, Wandsworth Town, Tooting, Balham and Nine Elms-Battersea Power Station) which are, themselves, residential in character. The 2021 census which took place during the coronavirus pandemic, shows there are approximately 190,441 people working in the borough. The proportion of Wandsworth residents working from home (56.5%) was the 4th highest in London (excluding City of London). Although national lockdown was in place on census day, this indicates that more Wandsworth residents have the ability to work from home compared to other London boroughs. The areas with higher proportions of residents working from home were Clapham Common West, Nightingale Lane and Balham. Of those still travelling to work the largest proportion (36%) travelled between 5km and 10km.

A map of the Borough is included in this Statement at Appendix A.

3. Licensing Objectives

3.1 The Act requires the Licensing Authority to carry out its various licensing functions so as to be reasonably consistent with the following three licensing objectives:

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

3.2 Wandsworth Council as Licensing Authority is aware that, as per Section 153 of the Act, in carrying out its licensing functions under the Act, particularly with regard to premises licences, it should aim to permit the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant code of practice issued by the Gambling Commission
- in accordance with any relevant guidance issued by the Gambling Commission
- reasonably consistent with the licensing objectives and
- in accordance with the authority's Statement of Policy and Principles

3.3 The Licensing Authority is under a duty to act fairly and rationally but cannot grant an application that does not satisfy the requirements of the preceding paragraph. Where there is conflict, the Gambling Commission Code of Practice and Guidance take precedence.

3.4 Nothing in this Statement will override the right of any person to make an application under this Act and have that application considered on its individual merits. Equally nothing in the Statement will undermine the right of any person to make representations to an application, or seek a review of a licence where there is a legal power to do so.

The Council's Objectives

- 3.5 The Authority recognises the importance of gambling as a legitimate part of the leisure industry and will therefore not override the rights of any person to make an application and to have it considered on its relative merits.
- 3.6 The Authority shall ensure that premises have appropriate safeguards in place to protect children and the vulnerable from harm and will work with enforcement partners to realise this aim and to ensure that gambling does not become a source of crime and disorder within the local community.
- 3.6 The Authority will work with the trade to promote well run establishments and to ensure that gambling is conducted in a fair and open way. Additions to this revised policy will help existing and new businesses to understand their regulatory obligations and to implement measures which meet our expectations.
- 3.7 The Authority will work with the Gambling Commission, trade and partners to control the inappropriate clustering of gambling licensed premises within the Authority's communities.

We will aim to deliver this by: -

- Ensuring that applicants clearly set out how they will promote the licensing objectives and assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate those risks.
- Ensuring that gambling operators continue to carry out research into the location of our licensed premises and the potential impacts on our community. Reviewing any significant changes to either local circumstances/and or the licensed premises. A risk assessment document must be revised for each of their licensed premise in the borough and will form part of our Local Area Profile (See appendix B)
- Engaging and working with the trade to promote high standards of compliance.
- Collaborative working with enforcement partners to take firm, fair and robust action against those who chose not to comply.
- Signposting vulnerable gamblers and their families to appropriate care and support.
- Ensuring Wandsworth is a safe place for everyone by using licensing functions to maintain a safe environment in which lawful gambling and gaming may take place.
- increasing the strength of the public voice to increase local democracy and accountability.
- Offering training to frontline staff on effects of gambling to appreciate the impacts of gambling on social, health and relationships wellbeing, and recognise gambling and/or other addictions within debt conversations and assessments.
- Listening to and responding to the views of our communities, representatives of the trade, partners and support groups

4. The Council's Vision and Values

- 4.1 This Statement of Principles contributes to London Borough of Wandsworth overall vision of "Building a fairer, compassionate and more sustainable borough" as set out in the Council's Corporate Plan for 2022-26.
- 4.2 The Council's Corporate Plan sets out the below overarching objectives to make Wandsworth more compassionate:
- Be a compassionate Council that truly listens and is ambitious for all.
 - Create safer neighbourhoods where communities feel confident and protected and victims and survivors are supported.
- 4.3 This Policy aims to 'achieve the right balance' through consideration of the needs of businesses, residents, visitors and other stakeholders, while maintaining a safer community for all. One of the purposes of this Policy is to ensure our residents live healthy, happy and independent lives. Ensuring that everyone benefits from our thriving economy, communities are safe, strong and our vulnerable are protected.
- 4.5 When developing this revised Statement of Principles, we have linked to specific areas of the Corporate Plan to achieve the aims and objectives of the Council, as outlined under paragraphs 3.5 – 3.7 above. Detailed information about the Council's Corporate Plan can be found on the Council's website at: <https://www.wandsworth.gov.uk/>

5. Licensing Authority functions

- 5.1 This document sets out the policies that this Authority will apply when making decisions upon applications or notifications made for:
- Premises licences (in respect of casinos, bingo premises, betting premises, tracks, adult gaming centres, family entertainment centres);
 - Provisional Statements where premises are intended to provide gambling activities;
 - Club Gaming permits and/or Club Machine Permits;
 - Permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres;
 - Notifications for the use of gaming machines in alcohol licensed premises for the use of two or fewer gaming machines;
 - Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines.
 - Registration of small society lotteries below prescribed thresholds;
 - Prize Gaming Permits;
 - Temporary Use Notices;
 - Occasional Use Notices;
- 5.2 Local licensing authorities are not involved in licensing remote gambling (e.g. internet gambling). This will fall to the Gambling Commission. Neither are they involved in

licensing the National Lottery nor regulating spread betting. Consequently, local licensing authorities do not have any powers to deal with the following gambling-related activities and licences:

- remote (online gambling);
- the National Lottery;
- gambling advertisements on television or other media;
- football pools;
- gaming machine manufacturers;
- gaming machine suppliers;
- gambling software;
- operating licences

6. Consultation

6.1 In preparing the statement the Council as a Licensing Authority is required to consult with key stakeholders and interested parties. The Licensing Authority will consult with the following parties on its proposed Statement of Principles:

- i) The Metropolitan Police;
- ii) The Fire Authority;
- iii) Operators of affected premises within the Borough;
- iv) Bodies representing businesses and residents of Wandsworth (including Town Centre Partnership Boards and Residents and Tenants Associations);
- v) Schools and Colleges;
- vi) Faith Groups
- vii) Wandsworth Safeguarding Adults and Children Boards
- viii) Wandsworth Health and Wellbeing Board
- ix) South West London and St Georges Mental Health NHS Trust
- x) Gamcare
- xi) Other Council departments;
- xii) Ward Councillors and local MP's;
- xiii) Adjoining Local Authorities
- xiv) The Gambling Commission
- xv) HM Revenue & Customs

6.2 A copy of the draft policy was also be published on the Council's website

6.3 The consultation took place between XX July and XX September 2024 (10 weeks).

6.4 The final statement, taking into account all representations, will be placed before a meeting of the Full Council and will be published on the Council's website. Copies will also be placed in the Town Hall for a period of four weeks prior to full implementation.

7. Declaration

7.1 In producing this Statement of Gambling Principles this Licensing Authority declares that it has had regard to the licensing objectives of the Act, the guidance issued by the Gambling Commission and any responses from those consulted on the Statement.

8. Responsible Authorities and Interested Parties

- 8.1 The Act allows for two different types of groups to make representations for or against an application to the Licensing Authority and also to apply to have existing licences reviewed by the Authority. These groups are 'Responsible Authorities' and 'Interested Parties'.
- 8.2 The Responsible Authorities are:
- i) a licensing authority in whose area the premises wholly or partly lie;
 - ii) the Gambling Commission;
 - iii) the Metropolitan Police;
 - iv) the London Fire Authority;
 - v) the planning department;
 - vi) the section of the Council responsible for the prevention of harm from pollution;
 - vii) the body designated as competent to advise the authority on the protection of children from harm;
 - viii) Her Majesty's Commissioners of Customs and Excise and
 - ix) any other person prescribed by Regulation made by the Secretary of State
- 8.3 The licensing authority is required to state the principles it will apply in exercising its powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The designated body must
- a. be responsible for an area covering the whole of the licensing authority's area; and
 - b. be answerable to democratically elected persons, rather than any particular vested interest group.
- 8.4 This authority designates Wandsworth Safeguarding Children Partnership for this purpose, but the Partnership may designate one of its members to be the person responsible for raising representations or applying for the review of an existing licence.
- 8.5 The contact details of all the Responsible Authorities under the Act are available via the Council's website at www.wandsworth.gov.uk
- 8.6 Interested parties are defined in S158 of the Act as someone who, in the opinion of the licensing authority,
- 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 in either of these two groups.
- 8.7 The Licensing Authority is required to state the principles it will apply in exercising its powers under the Act to determine whether a person is an interested party. This Authority will abide by the following principles:
- a. Persons living close to the premises. Each case will be decided upon its merits. This authority will not apply a rigid rule to its decision making. In determining what 'sufficiently close to the premises' means it will consider the examples of factors for considerations provided in the Gambling Commission's Guidance for local authorities namely:
 - the size of the premises;
 - the nature of the premises;

- the distance of the premises from the location of the person making representations;
 - the potential impact of the premises (number of customers, routes likely to be taken by the customers visiting the premises);
 - the circumstances of the complainant e.g. whether an individual, a residential school for children with truanting problems; a residential hostel for vulnerable adults.
- b. Persons with business interests that could be affected. Each case will be decided upon its merits having regard to the Gambling Commission's Guidance It will also consider the Gambling Commission's Guidance that "has business interests" should be given the widest possible interpretation and include partnerships (such as Town Centre Partnership Boards), charities, faith groups and medical practices.
- c. Persons representing those in the above categories. Interested parties can include trade associations and trade unions, and residents' and tenants' associations. However, these bodies will only be viewed as interested parties if they have a member who lives sufficiently close to the premises to be likely to be affected by the activities being applied for.

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

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

9. Notice of application

9.1 In addition to the statutory notice of application, this Authority will carry out the following additional consultation with interested parties in the case of new premises licence applications and variation applications:

- Notify Ward Councillors and any other person/body who has asked to receive such notification.

10. Exchange of Information

10.1 Licensing Authorities are required to include in their Statement, the principles to be applied when exchanging information with the Gambling Commission and other persons or bodies listed in Schedule 6 of the Act. In exchanging such information this Authority will act in accordance with the provisions of the Act, associated Regulations and Guidance issued by the Gambling Commission and will conform to the data protection and freedom of information legislation in accordance with the Council's existing policies.

10.2 Contact details, including email addresses (unless expressly asked otherwise), of those persons making representations and details of the representations will be made available to the applicant to allow for negotiation. In the event of a hearing being held the details

will be provided to members of the Licensing Committee and, should an Appeal follow the information will become a matter of public record.

10.3 Applicants and interested parties, by providing their details, must be aware that those details will be shared as laid out above and may be made public.

11. Duplication with other regulatory regimes

11.1 This Licensing Authority will seek to avoid any duplication with other statutory/regulatory systems where possible, including planning. This Licensing Authority will not consider whether a premises licence application is likely to be awarded planning permission or building regulations approval. It will though, listen to and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should the situation arise.

11.2 When dealing with a premises licence application for finished buildings, this Licensing Authority will not take into account whether those buildings have to comply with the necessary planning or building consents. Fire or health and safety risks will not be taken into account as these matters are dealt with under other legislation and do not form part of the consideration for a premises licence under the Act.

11.3 It should be note that a decision by the licensing authority under this Act shall not constrain any later decision by the authority under the law relating to planning or building control.

12. Administration, Exercise and Delegation of Functions

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

12.2 In order to provide a speedy, efficient and cost-effective service to all involved in the licensing process, the Committee has delegated certain decisions and functions to Sub-Committees.

12.3 Further, with many of the decisions and functions being purely administrative, the grant of non-contentious applications, for example, those licences and permits where no representations have been made, has been delegated to Council officers.

12.4 Appendix B sets out the proposed delegation of decisions and functions to the Licensing Committee, Sub-Committees and officers.

13. General Principles

13.1 The starting point in determining applications will be to grant the application without conditions, other than the mandatory conditions or default conditions laid down by the Secretary of State, subject to the applicant having identified any risks and offering any suitable control measure required to address the Borough's Local Area Profile. Default conditions will only be amended and additional conditions added where they are needed to meet the requirements of the licensing objectives, and any conditions applied will be proportionate. Conditions will be considered unnecessary if they are already adequately covered by other legislation or in the Default or Mandatory Conditions.

- 13.2 When determining an application to grant a Premises Licence or review a Premises Licence, the Licensing Authority will have regard to the proximity of the premises to schools, vulnerable adult centres and residential areas where there may be a high concentration of families with children or in areas of social deprivation or where there are high crime rates. The proximity of premises taken into consideration will vary depending on the size and scope of the gambling premises concerned. Each case will be considered on its merits. This Authority would expect the applicant to effectively demonstrate how they might promote the licensing objectives, address any relevant guidance issued by the Gambling Commission under section 25 of the Act and be in accordance with any relevant code of practice issued under section 24 of the Act. We would therefore expect a premises risk assessment to take into consideration the locality where the premises are situated.
- 13.3 When considering any conditions to be attached to a licence, the Licensing Authority will primarily focus on the impact of the authorised activities taking place at licensed premises on interested parties and/or in the context of the Licensing Objectives.
- 13.4 In determining any application the Licensing Authority may not have regard to the expected demand for the facilities, which it is proposed that the premises intend to provide.
- 13.5 The Licensing Authority recognises that, apart from the licensing function, there are a number of other mechanisms available for addressing issues that can occur away from licensed premises that may give rise to objections including:
- a) Planning controls;
 - b) Ongoing measures to create a safe and clean environment in these areas in partnership with local businesses, transport operators and other Council departments;
 - c) Regular liaison with the Police on law enforcement issues regarding disorder and anti-social behaviour;
 - d) The power of the Police, other responsible authorities or local residents and businesses to seek a review of the licence.
- 13.6 Objectors will be required to relate their objection to one or more of the Licensing Objectives for Gambling, listed at 3.1 above, before the Licensing Authority will be able to consider it. An application for a review of a licence must be made on the prescribed form but must also relate to the three Licensing Objectives for Gambling, listed at 3.1 above.
- 13.7 The Licensing Authority, in undertaking its licensing function, will have due regard to the need to eliminate unlawful discrimination and to promote equality and good relations between persons of different racial groups and to promote equality of opportunity for people with disabilities.

14. Gambling Prevalence and Social Responsibility

- 14.1 Gambling related harm is defined as any type of repetitive gambling that disrupts or damages a person, family, or recreational pursuits. It can have many and varied impact, including on an individual's physical and mental health, relationships, housing and finances and affect a wide range of people, such as families, colleagues and wider local communities (for example, where problem gambling is associated with crime or homelessness) and society as a whole (in terms of the costs that may be created by

problem gambling). Evidence suggests that certain groups are more vulnerable to problem gambling including children and young people, people with mental health issues, certain minority ethnic groups, the unemployed, homeless people, those with low intellectual functioning, people with financially constrained circumstances and those living in deprived areas. Harms may include financial hardship, relationship breakdown, domestic violence, mental health problems and suicidal thoughts.

14.2 Gambling Operators must comply with the Gambling Commission's Licence Conditions and Codes of Practice - Gambling Commission (LCCP). The Social Responsibility Code 3 requires gambling operators to have and put into effect policies and procedures to promote socially responsible gambling and these should reduce the risk of, and seek to identify, problem gambling.

14.3 The requirements on gambling premises under the social responsibility code are based upon key areas:

- Provision of information on gambling responsibly – for example, the availability of time or monetary limits for players and information on where to get help and advice about gambling.
- Customer interaction – licensees are required to have policies and procedures in place governing customer interaction where there are concerns that a customer is displaying signs of problem gambling. These will include staff training and the types of behaviour that may trigger an intervention or where staff may consider refusing services to customers.
- Layout of the premises - operators must ensure that the layout of a gambling premises supports the effective supervision of the premises.
- Self-exclusion – licensees must have procedures for self-exclusion that ensure that individuals who wish to self-exclude from gambling are prevented from participating in gambling. In addition to operating their own self-exclusion schemes all licensees must offer the facility for customers to self-exclude on a multi-operator basis, meaning that an individual who self-excludes from one operator should be able to self-exclude from all operators offering the same type of gambling in the same locality. Trade bodies for different sectors of the gambling industry have led on the development of multi-operator self-exclusion arrangements for each sector.

14.4 Any marketing communications for gambling must be socially responsible, with particular regard to the need to protect children, young persons, and other vulnerable persons from being harmed or exploited. Licensees are required to comply with the Social Responsibility Code 5 of the Licence Conditions and Codes of Practice - Gambling Commission (LCCP).

15. Premises Licences

15.1 Licensing Authorities are responsible for receiving, processing and deciding upon applications for premises licences under the Act, including the processing of review applications.

15.2 Premises licences will be subject to the processes set-out in the Act and regulations, as well as specific mandatory and default conditions detailed in regulations issued by the Secretary of State. The Authority will exclude default conditions and also attach other conditions where it believes it to be appropriate.

- 15.3 In making decisions about a premises licence this Authority will aim to permit the use of premises provided that it is:
- in accordance with any relevant code of practice issued by the Gambling Commission;
 - in accordance with any relevant guidance issued by the Gambling Commission;
 - reasonably consistent with the licensing objectives; and
 - in accordance with the authority's statement of licensing policy.
- 15.4 Moral objections or demand for gambling are not valid reasons to reject applications for premises licences.
- 15.5 Definition of "premises" - Premises is defined in the Act as "any place". A premises can only hold one premises licence, consequently different premises licences cannot apply in respect of one premises at different times. However, it is possible for a single building to hold a number of premises licences if it contains a number of distinct premises within it.
- 15.6 Whether different parts of a building can properly be regarded as being separate premises will be considered at the time of application and will depend on the individual circumstances. However, the Gambling Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or movable partitions, can properly be regarded as different premises.
- 15.7 This Authority will pay particular attention in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular this Authority will consider the following matters:
- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore premises should be configured so that children are not invited to participate in, have accidental access to, or closely observe gambling where they are prohibited from participating.
 - Entrances and exits from parts of the building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and people do not 'drift' into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit.
 - Compatibility of the establishments.
 - Whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the Act.
- 15.8 To assist this Authority in determining whether two or more proposed premises are truly separate, this Authority will ask the following questions:
- Is a separate registration for business rates in place for the premises?
 - Is the premises' neighbouring premises owned by the same person or someone else?
 - Can each of the premises be accessed from the street or a public passageway?
 - Can the premises only be accessed from any other gambling premises?
- 15.9 In addition to the matters laid out above this Authority, when considering the division of existing premises, would expect the partitioning between the two proposed units to be

fixed and immovable in nature, full height and not transparent in any part. Where both units are on the same floor it would expect the premises to have separate postal addresses, separate entrance doors and separate trading names. There should be no internal doors allowing customers to move between the premises.

- 15.10 A licence to use premises for gambling which have still to be constructed or altered will only be issued where this Authority is satisfied
- (i) that the premises ought to be permitted to be used for gambling; and
 - (ii) that appropriate conditions can be put in place to cater for the fact that the premises are not yet in the state in which they ought to be before gambling can take place.
- 15.11 This Authority will expect that a new application will be made if the plans submitted at the time of the application are changed in any material respect during the construction and fitting out of the premises after the grant of the licence to preserve the rights of interested parties and responsible authorities to make representations.
- 15.12 Controlling where gaming machines may be played and Plans – The Act and associated regulations set out the regulatory framework for controlling gaming machines. By linking different machine entitlements to different types of premises the framework seeks to ensure the number of machines and levels of stakes and prizes of machines is proportionate to the premises. The Gambling Commission's social responsibility code within the Licensing Conditions and Codes of Practice (LCCP) requires that gaming machines are only made available in combination with the named non-remote activity of the operating licence. . Thus, for example, a premises licensed for the purposes of providing facilities for bingo must operate as such and not merely be a vehicle to offer higher stake and prize gaming machines.
- 15.13 In premises licensed for betting, substantive facilities for non-remote betting must be provided if gaming machines are to be made available. The facilities provided must include information that enables customers to access details of events on which bets can be made, make such bets, learn the outcome and collect any winnings. Where betting facilities are provided only by machines the number of betting machines must exceed the number of gaming machines made available for use.
- 15.14 In order to ensure that a premises is properly providing the named non-remote activity of the operating licence this Authority will expect all new premises licence applications and all variation applications to be accompanied by a plan that not only complies with the requirements of the legislation but also clearly indicates the area used for the named non-remote gambling activity and any other gambling activity, including the number and position of all machines (both betting machines and gaming machines).
- 15.15 Where the number and/or position of machines are altered this Authority will expect a revised plan to be provided to the Licensing Authority. This revised plan will be held by the Authority but will not be substituted on the licence unless the licence is re-issued following a variation or change of circumstance application.
- 15.16 Location - This licensing authority is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can. When considering an application, particular attention will be paid to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as to issues of crime and disorder.

15.17 This Authority will take specific note of whether an application relates to a premises that is:

- close to an educational establishment, including colleges and universities;
- close to a centre dealing with vulnerable people;
- situated in an area of high crime;
- situated in an area of deprivation;
- close to the location of services for children such as libraries and leisure centres;
- close to the location of businesses providing instant access to cash such as pay day loans, pawn shops.

15.18 Local Risk Assessments and Local Area Profiles As of 6th April 2016 the Gambling Commission's social responsibility code within the Licensing Conditions and Codes of Practice (LCCP) requires operators to assess the local risks to the licensing objectives posed by the provisions of gambling facilities at each of their premises and have policies, procedures and control measures to mitigate those risks. Following that date operators must review those assessments when certain triggers are met as laid out in paragraph 15.21 below.

15.19 This Authority considers that these local risk assessments are a key component of the overall assessment and management of the local risks. Each locality has its own challenges and in order to assist applicants this Authority has produced

(a) a map of the area showing the location of:

- existing gambling premises,
- educational establishments,
- Pay day loan/pawnshops
- GP surgeries/Health Centres
- Places of worship
- youth clubs,
- leisure centres,
- libraries,
- children's centres,
- community centres/clubrooms,
- Foodbanks,
- supported accommodation,
- drug/alcohol services.

(b) a map of reported crime (excluding sexual offences) in the borough between April 2023 and March 2024 by Ward level.

(c) a map showing deprivation indices in the borough 2019 by LSOA boundaries. Deprivation levels shown are relative to the borough i.e. the 10% most deprived are relative to the borough and not to any national figures;

(d) a map showing indices of employment deprivation in the borough 2019 by LSOA boundaries. Again, the deprivation levels shown are relative to the borough i.e. the 10% most deprived are relative to the borough and not to any national figures;

(e) a table indicating the percentage population of each Ward by age group; and

(f) a table showing the number of people under the age of 18 living in each Ward

This information is attached as Appendix D to this Statement of Principles. The information will identify the areas deemed to be high, medium and low risk by this Authority and will be updated together with any review of this statement.

- 15.20 Applicants will also be expected to take note of the information published by GambleAware via its interactive maps on estimated gambling prevalence and treatment and support usage in the borough.
- 15.21 This Authority will expect applicants for a new licence to submit the completed assessment with their application. It must identify the risks and state what control mechanisms are to be employed at the premises to ensure that the licensing objectives are being met having regard to the local area profiles produced by this Authority. The assessment must consider at a minimum:
- The local area, including but not restricted to the types of premises and operation in the area surrounding the gambling premises; the character of the area, for example is it predominantly residential or commercial, is it a family orientated area; transport links; educational facilities; centres for vulnerable people; ethnicity, age, economic makeup of the local community; high crime area; high unemployment area; pawn broker/pay day loan businesses in the vicinity; other gambling premises in the vicinity
 - The gambling operation, including but not restricted to what gambling products it provides in the premises; the staffing levels within the premises; the level and requirement for staff training; whether loyalty or account cards are used or not; the security and crime preventions arrangements it has in place; how it advertises locally and on the premises; the marketing material within the premises; the display and provision of information
 - The design and layout of the premises, including but not restricted to whether the staff have obstructed views of gaming machines or entrances; whether the design is such that children can see gambling taking place.
 - The control mechanisms to be put in place to mitigate the risks e.g. the use of CCTV cameras, the provision of magnetic door locks, employment of door supervisors, employing a challenge 25 scheme, increased number of trained staff.
- 15.22 Operators are required to review their local risk assessments if significant changes in local circumstances occur, when there are significant changes at a licensee's premises that may affect their mitigation of local risks and when applying for the variation of a licence. The following list sets out what is considered to be significant changes in local circumstances:
- Any substantial building development or conversion of existing premises in the local area which may increase or decrease the number of visitors.
 - A new pay day loan or pawn broker opens in the local area
 - Relevant significant changes are made to the provision, location and/or timings of public transport in the vicinity of the premises e.g. extension of London Underground Services or the re-location of a bus stop used by children
 - An increase in educational facilities in the local area, e.g. the opening of new schools/colleges or the extension of an existing establishment
 - The local area is identified as a crime hotspot by the police and/or Licensing Authority
 - Any vulnerable group is identified by the Licensing Authority or venues relating to those vulnerable groups are opened in proximity to gambling premises
 - New gambling premises opens in the local area
 - Where underage testing has identified a problem.
- 15.23 An operator submitting a variation application to the Licensing Authority will be expected to provide a copy of the reviewed local risk assessment with the application.

15.24 This Authority will consider the local risk assessment when determining a new application or a variation application. The licensing authority may add a control mechanism identified in the assessment as a condition if there is good reason to do so. To assist operators in formulating their risk assessments guidance is contained in Appendix C on the matters that this Authority would expect to be included in a risk assessment. This Authority is particularly concerned:

- To prevent the clustering of gambling premises in any one area of the borough; and
- To ensure that staffing levels are sufficient and that staff are trained and supported to identify and work with problem gamblers; and
- To ensure that measures are in place to prevent underage gambling.

15.25 The list is not exhaustive and every risk assessment should be based on the individual premises and the issues in the local area.

15.26 This policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome.

15.27 It is expected that the local risk assessment will be kept on the premises to which it relates (or be immediately accessible) in order to assist staff in carrying out their duties and to ensure that it is available during inspection by authorised officers.

15.28 Licensing objectives. Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, this licensing authority has considered the Gambling Commission's Guidance to local authorities and some comments are made below.

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime - This Authority acknowledges that the Gambling Commission will be taking a leading role in preventing gambling from being a source of crime. The Gambling Commission's Guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, where an area has known high levels of crime this authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors or higher staffing levels.

This Authority acknowledges that in the case of gambling premises, disorder is intended to mean activity that is more serious and disruptive than just nuisance. In making a distinction between disorder and nuisance the Licensing Committee will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see or hear it in considering any contested application.

Ensuring that gambling is conducted in a fair and open way. This Authority has noted that the Gambling Commission has stated that it would generally not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences. However, should this Authority become concerned about the manner that a premises is operating then the matter will be referred to the Gambling Commission.

Protecting children and other vulnerable persons from being harmed or exploited by gambling. In exercising its powers under S153 this Authority will consider, as suggested in the Gambling Commission's Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include ensuring that there are adequate staffing levels, supervision of entrances / machines, segregation of areas from areas frequented by children, introducing a Challenge 21 policy.

As regards the term "vulnerable persons" it is noted that the Gambling Commission does not seek to offer a definition but states that "it does for regulatory purposes assume that this group includes people who gamble more than they want to; people who are gambling beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health,, learning disability or substance misuse relating to alcohol or drugs." This licensing authority will consider this licensing objective on a case by case basis.

- 15.29 Conditions. Conditions may be attached to premises licences in the following way:
- Automatically – having been set out in the face of the Act
 - Mandatory conditions – as specified by the Secretary of State which must be attached to the premises licence
 - Default conditions – as specified by the Secretary of State which will be attached to the premises licence unless excluded by the licensing authority. Default conditions will normally be applied to applications.
 - Conditions attached by the licensing authority.
- 15.30 Any conditions attached to licences will be proportionate and will be:
- Necessary to uphold the licensing objectives
 - Relevant to need to make the proposed building suitable as a gambling facility;
 - directly related to the premises and the type of licence applied for;
 - fairly and reasonably related to the scale, type of premises and locality; and
 - reasonable in all other respects.
- 15.31 This Authority recognises that the conditions necessary for the general good conduct of gambling premises will be those set down as mandatory and default conditions. Where there are specific risks and problems associated with a particular locality, premises or class of premises this Authority may attach individual conditions to address this.
- 15.32 Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures this Authority will consider utilising should there be a perceived need, such as the use of door supervisors, appropriate signage for adult only areas, staffing levels and staff training in premises where alcohol may be consumed etc. This Authority will also consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises.
- 15.33 This Authority will also ensure that where category C or above Amusement with Prizes machines are on offer in premises to which children are admitted:
- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
 - only adults are admitted to the area where these machines are located;

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

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

15.35 It is noted that there are conditions which the licensing authority cannot attach to premises licences which are:

- i) any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- ii) conditions relating to gaming machine categories, numbers, or method of operation;
- iii) conditions which provide that membership of a club or body be required; and
- iv) conditions in relation to stakes, fees, winning or prizes.

15.36 Door Supervisors. The Gambling Commission advises in its Guidance for local authorities that licensing authorities may consider whether there is a need for door supervisors having regard to the licensing objectives. It is noted though that in-house staff carrying out the function of a door supervisor at casinos or bingo premises are not required to be licensed by the Security Industry Authority (SIA). However, this Authority would expect that door supervisors working at bingo premises would have successfully completed a training course approved by the SIA prior to their employment as a door supervisor. This is in recognition of the nature of the work in terms of searching individuals, and dealing with potentially aggressive persons, etc. It should be noted that contract staff carrying out the function of a door supervisor do require to be licensed by the Security Industry Authority.

15.37 For premises other than casinos and bingo premises it may be decided either by the operator through their local risk assessment or by the Licensing Committee that supervision of entrances / machines is appropriate for particular cases and whether these need to be SIA licensed or not. It will not be automatically assumed that they need to be.

16 **Casinos**

16.1 This licensing authority is proposing to re-state its 'no casino' resolution on the basis that this Borough is predominantly residential in nature and a casino would be out of character to the area. In addition, Wandsworth has a thriving and diverse leisure and night-time economy, presently centred around five town centres, primarily characterised by leisure, licensed and food-led premises. The Council would not want to create an imbalance between these competing town centre economies and is concerned that a casino located in one would be likely to have this effect. As the town centres are located in close proximity to residential premises a casino located in a town centre would increase the likelihood of nuisance. It is likely also that the economies of the other four town centres would be adversely affected possibly giving rise to a higher incidence of crime and disorder. A location outside of the town centres would be similarly detrimental to all five town centres

16.2 Potential licence applicants should note that a 'no-casino' resolution will mean that no applications for casino premises licences will be considered. Any applications received will be returned with a notification that a 'no-casino' resolution is in place.

17 Travelling Fairs

17.1 This Authority is responsible for deciding whether the provision of Category D machines and / or equal chance prize gaming without a permit available for use at a travelling fair amounts to no more than an ancillary amusement at that fair.

17.2 The licensing authority will also consider whether the applicant falls within the statutory definition of a travelling fair.

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

18 Provisional Statements

18.1 Applicants may make an application for a provisional statement in respect of premises that they expect to be constructed, altered, or to acquire a right to occupy. It is also possible for an application for a provisional statement to be made for premises that already have a premises licence. Those applying for a provisional statement do not have to have applied for or hold an operating licence, nor do they need to have the right to occupy the premises.

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

- a. which could not have been raised by objectors at the provisional licence stage;
- b. which in the authority's opinion reflects a change in the operator's circumstances;
- or
- c. where the premises has not been constructed in accordance with the plan and information submitted with the provisional statement application. This must be a substantial change to the plan and this licensing authority will discuss any concerns we have with the applicant before making a decision.

18.3 With regard to provisional statements this authority has noted the Gambling Commission's Guidance that "a licensing authority must not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with planning or building law".

19 Reviews

19.1 Requests for a review of a premises licence can be made by interested parties or responsible authorities. It is for the licensing authority to decide whether the review is to

be carried-out. In deciding whether to review the licence the Authority will consider whether it:

- is in accordance with any relevant code of practice issued by the Gambling Commission;
- is in accordance with any relevant guidance issued by the Gambling Commission;
- is reasonably consistent with the licensing objectives;
- is in accordance with the authority's statement of licensing policy;
- is frivolous or vexatious or substantially the same as previous representations or requests for review;

will certainly not cause the Authority to alter, revoke or suspend the licence.

19.2 The licensing authority can also initiate a review of a licence on the basis of any reason which it thinks is appropriate.

20 COMPLAINTS AGAINST LICENSED PREMISES

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

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

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

18.4 Due consideration will be given to all relevant representations.

21 Permits

21.1 Unlicensed Family Entertainment Centre gaming machine permits Where a premises does not hold a premises licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit. It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (Section 238 of the Act).

21.2 This Authority will expect that a plan showing the layout of the premises with the locations of gaming machines highlighted will accompany the application.

21.3 An application for a permit may only be granted if the licensing authority is satisfied that the premises will be used as an unlicensed Family Entertainment Centre, and if the chief officer of police has been consulted on the application. This Authority will expect applicants to demonstrate:

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

- 21.4 In addition, this Authority will expect the applicant to have policies and procedures in place to protect children from harm in the widest context (not limited to only harm from gambling). This will include:
- measures to deal with suspected truant school children, including the establishment of close working relationships with local schools and the local education authority
 - measures to deal with unsupervised very young children on the premises
 - measures to deal with children causing perceived problems on or around the premises
- 21.5 This Authority understands that they may either grant or reject an application but cannot attach conditions to this type of permit.
- 21.6 (Alcohol) Licensed premises gaming machine permits and automatic entitlement: 2 machines There is provision in the Act for alcohol licence holders to automatically have 2 gaming machines, of categories C and/or D for use in premises licensed to sell alcohol for consumption on the premises. The premises merely need to notify the licensing authority. The licensing authority can remove the automatic authorisation in respect of any particular premises if:-
- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
 - gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act. These are: that written notice has been provided to the licensing authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with;
 - the premises are mainly used for gaming; or
 - an offence under the Act has been committed on the premises.
- 21.7 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance or Codes of Practice issued by the Gambling Commission and "such matters as they think relevant." This Authority considers that "such matters" will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from being harmed or exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machines. Measures which will satisfy the authority that there will be no access may include:
- the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18.
 - the provision of notices and/or signage.
 - the provision of information leaflets/helpline numbers for organisations such as GamCare, Gamblers Anonymous
- 21.8 An application for a permit for more than two machines will generally be granted if the operator is complying with the Gambling Commission Code of Practice unless there are particular and compelling reasons not to do so, for example if alcohol has been sold on the premises to persons under 18 or the premises has a history of crime and disorder.
- 21.9 It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with as an Adult Gaming Centre premises licence.

- 21.10 This Authority recognises that it can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for but that conditions (other than these) cannot be attached.
- 21.11 Prize Gaming Permits The Gambling Act 2005 states that a licensing authority may "prepare a statement of principles that they propose to apply in exercising their functions under this Schedule" which "may, in particular, specify matters that the licensing authority propose to consider in determining the suitability of the applicant for a permit".
- 21.12 This Authority would expect an applicant to set out the types of gaming that is intended to be offered and be able to demonstrate:
- that they understand the limits to stakes and prizes that are set out in Regulations;
 - that the gaming offered is within the law; and
 - suitable policies that outline the steps to be taken to protect children from harm.
- 21.13 In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.
- 21.14 It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:
- the limits on participation fees, as set out in regulations, must be complied with;
 - all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
 - the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
 - participation in the gaming must not entitle the player to take part in any other gambling.
- 21.15 Club Gaming Permits and Club Machines Permits Members Clubs and Miners' welfare institutes (but not Commercial Clubs) may apply for a Club Gaming Permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set-out in regulations. A Members Clubs and Miners Welfare Institutes and Commercial Clubs may apply for a club machine permit. A Club machine permit will enable the premises to provide gaming machines (3 machines of categories B, C or D).
- 20.16 The Licensing Authority must satisfy itself that a club meets the requirement of the Act to obtain a club gaming permit. In doing so that it will take into account the matters as laid down in the Gambling Commission's Guidance namely that "Members clubs must have at least 25 members and be established and conducted "wholly or mainly" for purposes other than gaming, unless the gaming is restricted to Bridge or Whist. A members' club must be permanent in nature and established and conducted for the benefit of its members and not as a commercial enterprise. Examples include working men's clubs, branches of Royal British Legion and clubs with political affiliations."
- 21.17 The Commission Guidance also notes that "licensing authorities may only refuse an application on the grounds that:

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

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

- the club is established primarily for gaming, other than gaming prescribed by regulations under section 266 of the Act
- in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
- a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

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

22 Temporary and Occasional Use Notices

22.1 Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator (holding the relevant operating licence) wishes to use the premises temporarily for providing facilities for gambling.

22.2 There are statutory limits as regards temporary use notices. This includes that a set of premises may not be the subject of temporary use notification for more than 21 days in any period of 12 months. The definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In considering whether a place falls within the definition of "a set of premises", this Authority will look at, amongst other things, the ownership/occupation and control of the premises. This Authority will object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises.

22.3 The Secretary of State has the power to determine what form of gambling can be authorised by a Temporary Use Notice. Currently, the regulations allows such a Notice to permit facilities for equal chance gaming, where the gaming is intended to produce a single winner, which typically, to date, means a poker tournament.

22.4 Occasional Use Notices: The Act provides that where there is betting on a track on eight days or less in a calendar year, betting may be permitted by an occasional use notice without the need for a full premises licence. The licensing authority has no discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. This Authority will thoroughly consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

23 Lotteries

- 23.1 The Licensing Authority is responsible for the registration of small scale society lotteries where the principal office is located within the borough. Such lotteries can only be promoted for charitable purposes, participation in or supporting sport, cultural activities or for other non-commercial purposes other than for private gain.
- 23.2 Applicants are reminded that their application is likely to be refused if:
- The application is not on behalf of a non-commercial society;
 - A person connected with the lottery promotion has been convicted of a relevant offence;
 - False or misleading information has been provided.
- 23.3 The Authority will, where necessary, invite applicants to provide evidence to support their application including articles of association, minutes of Annual General Meetings or Committee Meetings or other such documents that may assist with the application.
- 23.4 In considering whether to refuse an application where a bona fide application has been made or revoke an existing registration this Authority will first give an opportunity to the society to make representations.
- 23.5 The providers of small society lotteries are required to submit a formal return to the Authority following each draw. The Authority may investigate providers of small society lotteries in the event of:-
- a late or missing statutory return;
 - evidence or report of tickets being sold to children;
 - any suspected misappropriation of funds; or
 - the receipt of reports of lotteries being held without or in breach of a registration.

24. Enforcement

- 24.1 Licensing authorities are required by regulation under the Act to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.
- 24.2 In carrying out its enforcement function this Authority will comply with the Regulators Code and will:
- Carry out our activities in a way that supports those we regulate to comply and grow
 - Provide simple and straightforward ways to engage with those we regulate and hear their views
 - Base our regulatory activities on risk
 - Share information about compliance and risk
 - Ensure clear information, guidance and advice is available to help those we regulate meet their responsibilities to comply
 - Ensure that our approach to regulatory activities is transparent
- 24.3 The main enforcement and compliance role for this Authority in terms of the Act will be to ensure compliance with the premises licences and other permissions which it authorises. The Gambling Commission are the enforcement body for the operating and personal

licences. Concerns about manufacture, supply or repair of gaming machines will be notified to the Gambling Commission.

24.4 This Authority will adopt a risk-based inspection programme having regard to statutory requirements, Primary Authority agreements and Gambling Commission Guidance. In general enforcement visits will be targeted as follows:

- To high risk premises;
- To premises where it is believed that trading is taking place without the necessary permissions or where conditions are not being observed;
- To premises where complaints have been received; and
- To premises where intelligence suggests that underage gambling is taking place or criminal or disorderly conduct has occurred.

24.5 When determining risk consideration will be given to:

- The nature of the gambling activities taking place on the premises;
- The location of the premises having regard to the Authority's risk profile;
- The procedures put in place by the management to meet the licensing objectives.

24.6 Enforcement action will be taken having regard to the Council's Environmental Services Enforcement Policy and the Code for Crown Prosecutors.

24.7 This licensing authority will endeavour to avoid duplication with other regulatory regimes so far as possible.

FURTHER INFORMATION

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

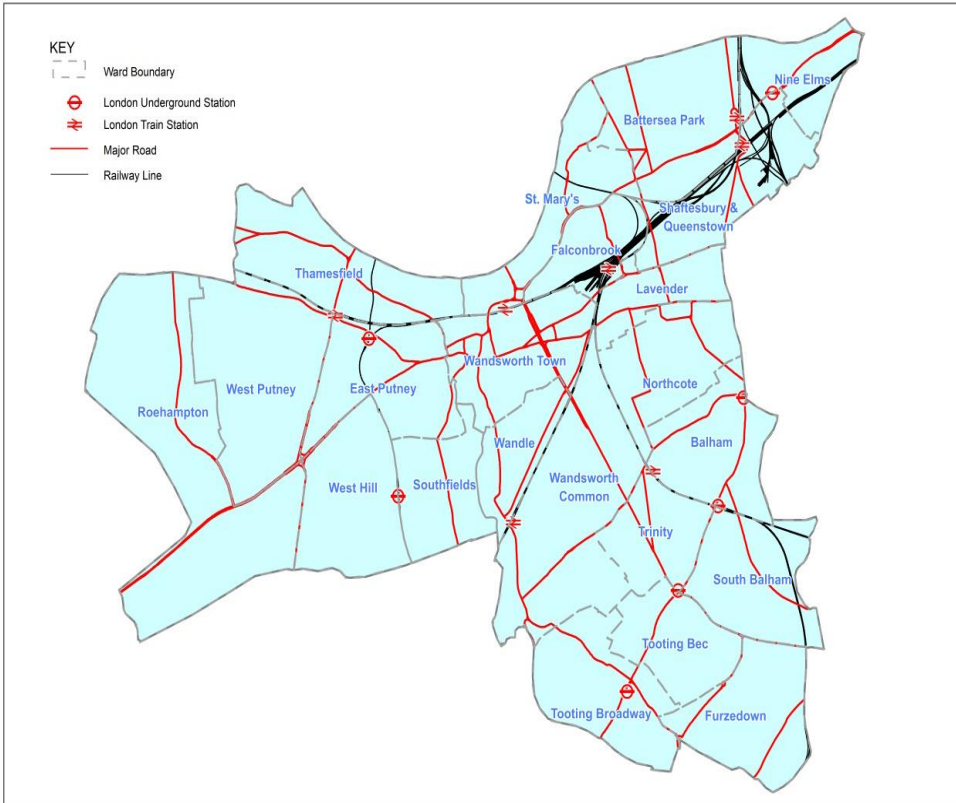
Licensing Team
Regulatory Services Partnership (serving Merton, Richmond and Wandsworth Councils)
London Borough of Merton
Civic Centre London
Road Morden
SM4 5DX

Telephone: 020 8545 3969
E-mail: licensing@merton.gov.uk
Web page www.merton.gov.uk

Gambling Commission
Victoria Square House
Victoria Square Birmingham
B2 4BP
E-mail: info@gamblingcommission.gov.uk

DRAFT

APPENDIX A – Map of Wandsworth



APPENDIX B – Delegation of decisions and functions

Matter to be dealt with	Full Council	Full Committee	Sub Committee	Officers
Final approval of three year licensing policy	Yes			
Policy not to permit casinos	Yes			
Fee setting (when appropriate)		Yes		
Application for premises licence			If a representation has been made and not withdrawn	If no representations made/representations have been withdrawn
Application to vary premises licence			If a representation has been made and not withdrawn	If no representations made/representations have been withdrawn
Application to transfer a licence			If a representation has been received from the Commission	If no representations made
Application for a provisional statement			If a representation has been made and not withdrawn	If no representations made/representations have been withdrawn
Application to review premises licence			All cases	
Application for club gaming/club machine permits			If a representation has been made and not withdrawn	If no representations made
Cancellation of club gaming/club machine permits			All cases	
Applications for other permits			If a representation has been made and not withdrawn	If no representations made
Cancellation of licensed premises gaming machine permits				All cases
Consideration of temporary use notice				All cases
Decision to give counter notice to a temporary use notice			All cases	
Decision on whether a representation is irrelevant frivolous vexatious or substantially the same as previous representations etc				All cases
Representation by Licensing Authority as Responsible Authority				All cases

APPENDIX C – Risk Assessment Guidance

1. Adult Gaming Centres

This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling. Operators will be expected to complete their own local risk assessments based on information provided in the local area profiles produced by this Authority but should include consideration of the following:

- Think 21 scheme
- Closed Circuit Television
- Permanent adequate staff supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare, the NHS funded National Problem Gambling clinic, Gamblers Anonymous and the Samaritans
- Training of staff to offer brief intervention when customers show signs of excessive gambling.
Training of staff to ensure that they can identify children and other vulnerable people and take appropriate action to ensure that they are not able to access the premises or are supported appropriately.
- [Staff training to ensure that staff are aware of the procedures for identifying drug use, reporting illegal activity.](#)
- [Implementation of a logging system for when drug use/ dealing has been identified and when the police was notified.](#)
- [Collaborate with other businesses and participate in any crime reduction scheme in operation](#)

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

2. (Licensed) Family Entertainment Centres

This Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. Operators will be expected to complete their own local risk assessments based on information provided in the local area profiles produced by this Authority but should include consideration of the following:

- Closed Circuit Television
- Permanent adequate staff supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare, the NHS funded National Problem Gambling clinic, Gamblers Anonymous, the Samaritans and Child Line.
- Measures / training for staff on how to deal with suspected truant school children on the premises including the establishment of close working relationships with local schools and the local education authority.
- The requirement that children must be accompanied by an adult.

- Disclosure and Barring (DBS/CRB) checks for staff.
- Policies to address seasonal periods where children may more frequently attempt to gain access to premises and gamble such as pre and post school hours and during school holidays.
- Measures/training for staff on child protection measures.
- Collaborate with other businesses and participate in any crime reduction scheme in operation

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

3. Bingo premises

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

"Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed."

It is important that if children are allowed to enter premises licensed for bingo that they do not participate in gambling, other than on Category D machines. This Authority will specifically have regard to the need to ensure that children do not participate in gambling. As alcohol may be sold on the premises, this Authority will also have particular regard to the measures to be put in place to ensure that persons involved in gambling have not consumed excess alcohol.

Operators will be expected to complete their own local risk assessments based on information provided in the local area profiles produced by this Authority but should include consideration of the following:

- Proof of age schemes
- Closed Circuit Television
- Permanent adequate staff supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Measures/training for staff to ensure that persons engaged in gambling have not consumed an excess of alcohol
- Numbers of staff on duty at any one time

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

4. Betting premises

This Authority will specifically have regard to the need to protect vulnerable persons from harm or being exploited by gambling and the need to ensure that the premises are not associated with crime or disorder. This Authority is also concerned to ensure that there is not clustering of betting premises in any one area of the Borough.

Operators will be expected to complete their own local risk assessments based on information provided in the local area profiles produced by this Authority but should include consideration of the following:

- Think 21 scheme
- Closed Circuit Television
- Permanent adequate staff supervision of entrances / machine areas, which should generally be a minimum of two persons on duty at any time.

- Notices / signage
- Minimum staffing levels
- The number of counter positions available for person to person transactions
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare, the NHS funded National Problem Gambling clinic, Gamblers Anonymous and the Samaritans
- Training of staff to offer brief intervention when customers show signs of excessive gambling
- Staff training on dealing with persons who wish to gamble who are intoxicated
- Measures to prevent disorder associated with customers congregating outside the premises to smoke or drink alcohol
- Training of staff to ensure that they can identify children and other vulnerable people and take appropriate action to ensure that they are not able to access the premises or are supported appropriately.
- Staff training to ensure that staff are aware of the procedures for identifying drug use, reporting illegal activity.
- Implementation of a logging system for when drug use/ dealing has been identified and when the police was notified.
- Collaborate with other businesses and participate in any crime reduction scheme in operation.

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

Betting premises may make available machines that accept bets on live events, such as horse racing, as a substitute for placing a bet over the counter. These betting machines are not gaming machines and therefore neither count towards the maximum permitted number of gaming machines, nor have to comply with any stake or prize limits. While this Authority has the power to restrict the number of betting machines, their nature and the circumstances in which they are made available by attaching a licence condition such action will only be taken where there is clear evidence that such machines may have been or are likely to be used in breach of the licensing objectives. Where there is such evidence, this authority will consider the control measures in the local risk assessment and, in particular, the ability of staff to monitor the use of such machines from the counter.

This authority will give due consideration to premises licence applications in respect of re-sites of a betting premises within the locality and to extensions where these replace and enhance the quality of the facility provided for the benefit of the betting public.

5. Tracks

Currently this Authority has no track betting premises in its area. However this licensing authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. In line with the Gambling Commission's Guidance, this Authority will especially consider the impact upon the third licensing objective (i.e. the protection of children and vulnerable persons from being harmed or exploited by gambling) and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

This authority will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for

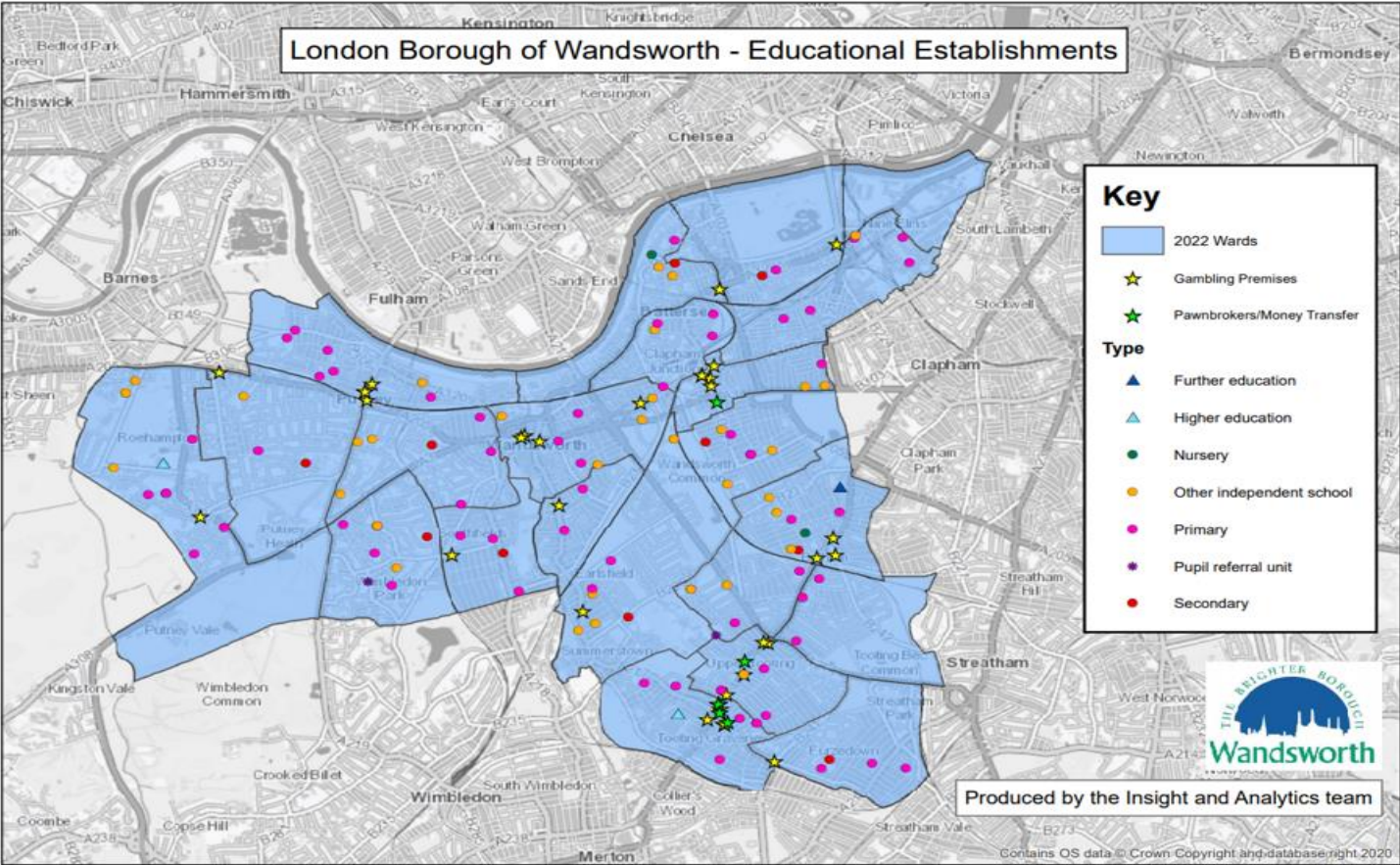
betting are provided on days when dog-racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided or from using betting machines.

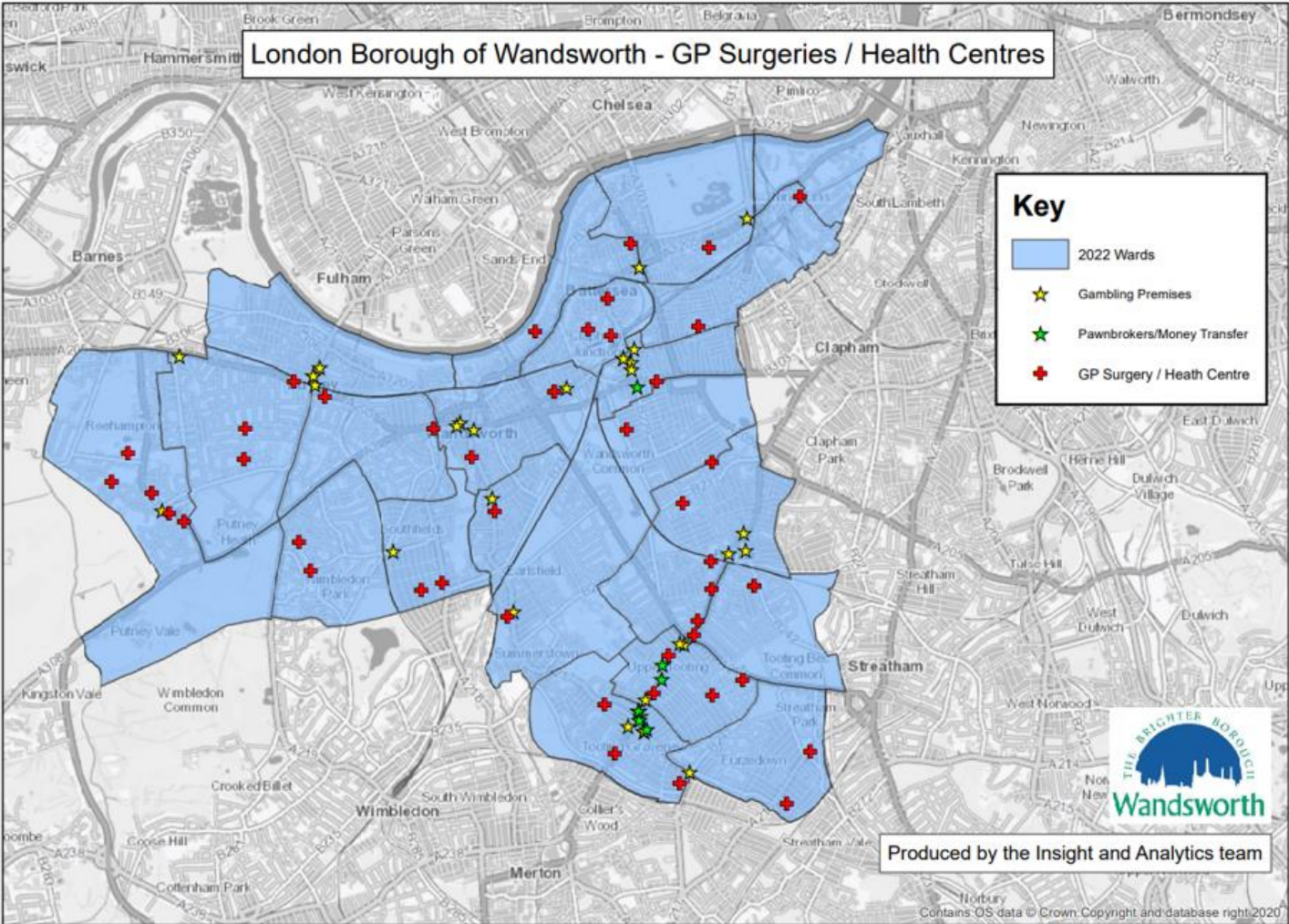
Operators will be expected to complete their own local risk assessments based on information provided in the local area profiles produced by this Authority but should include consideration of the following:

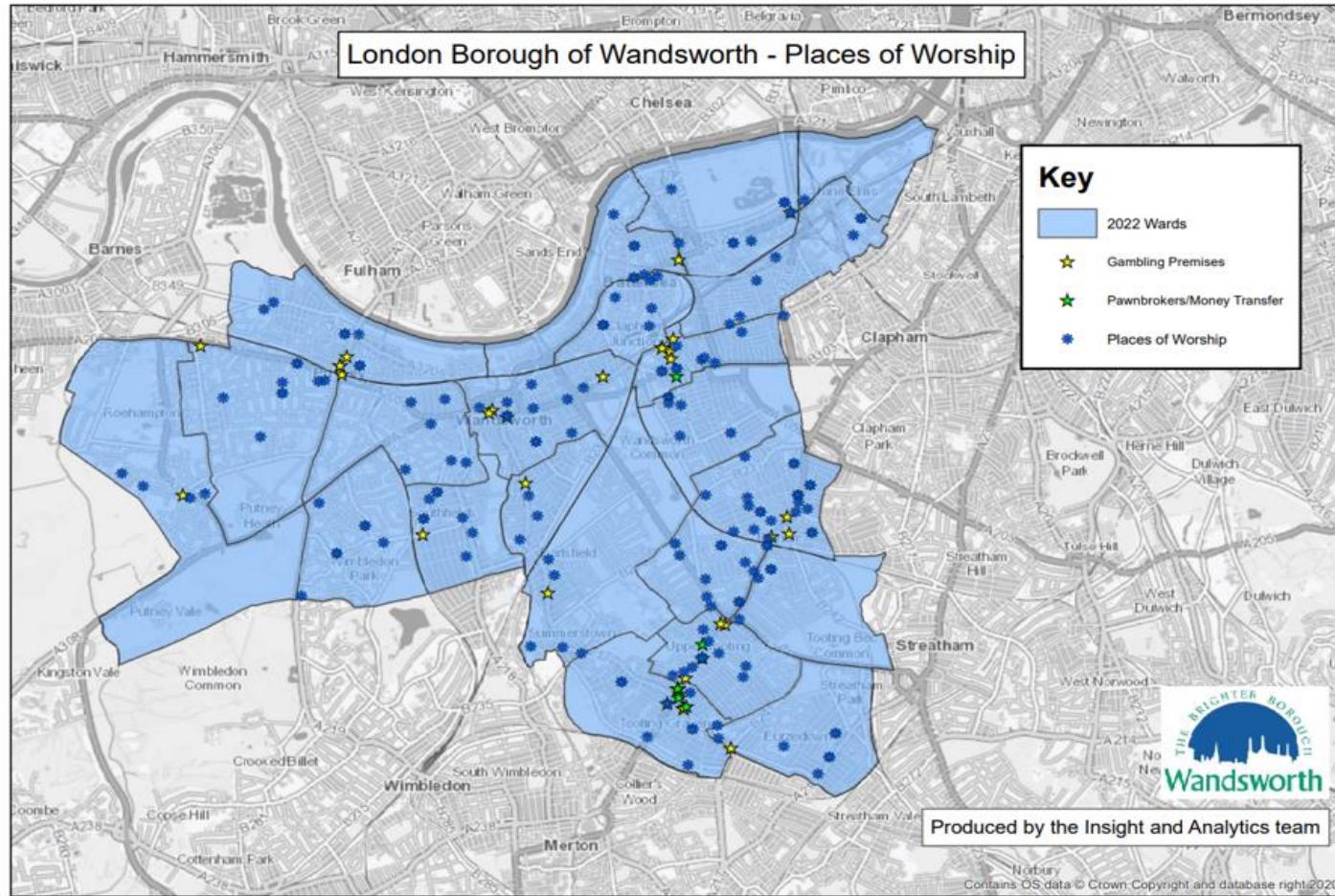
- Proof of age schemes
- Closed Circuit Television
- Permanent adequate staff supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare, the NHS funded National Problem Gambling clinic, Gamblers Anonymous and the Samaritans
- Method for advertising rules in or near the betting areas or in another way to ensure that the public are informed

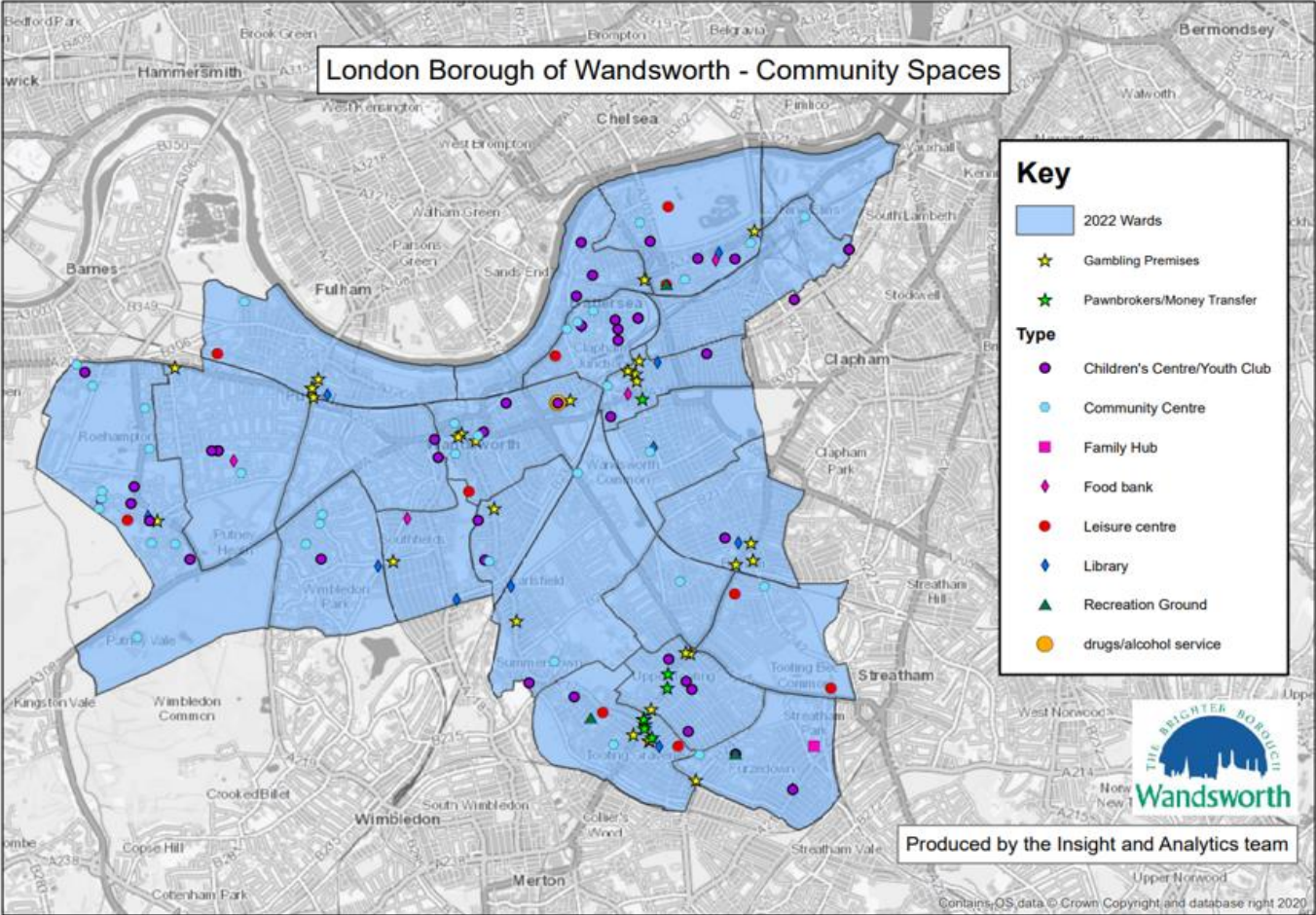
This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

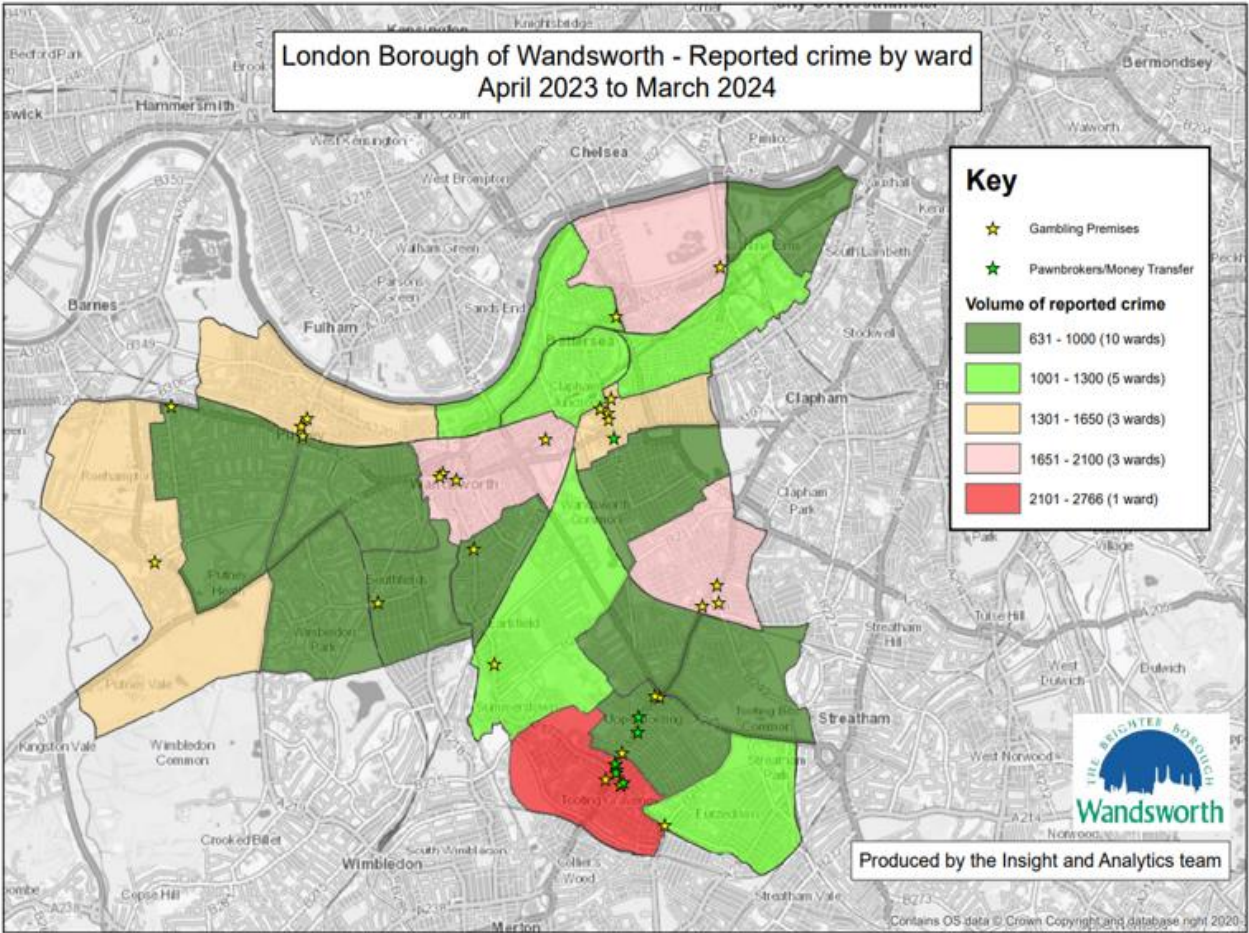
APPENDIX D – Local Area Profile





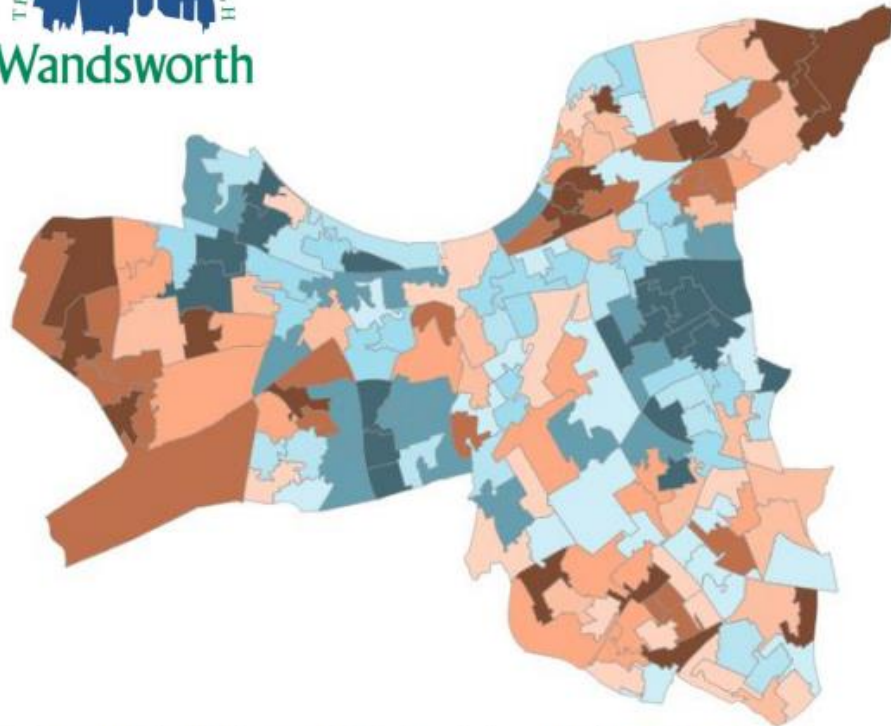








Indices of Multiple Deprivation (IMD) 2019 - Overall, Wandsworth, local comparison



Label

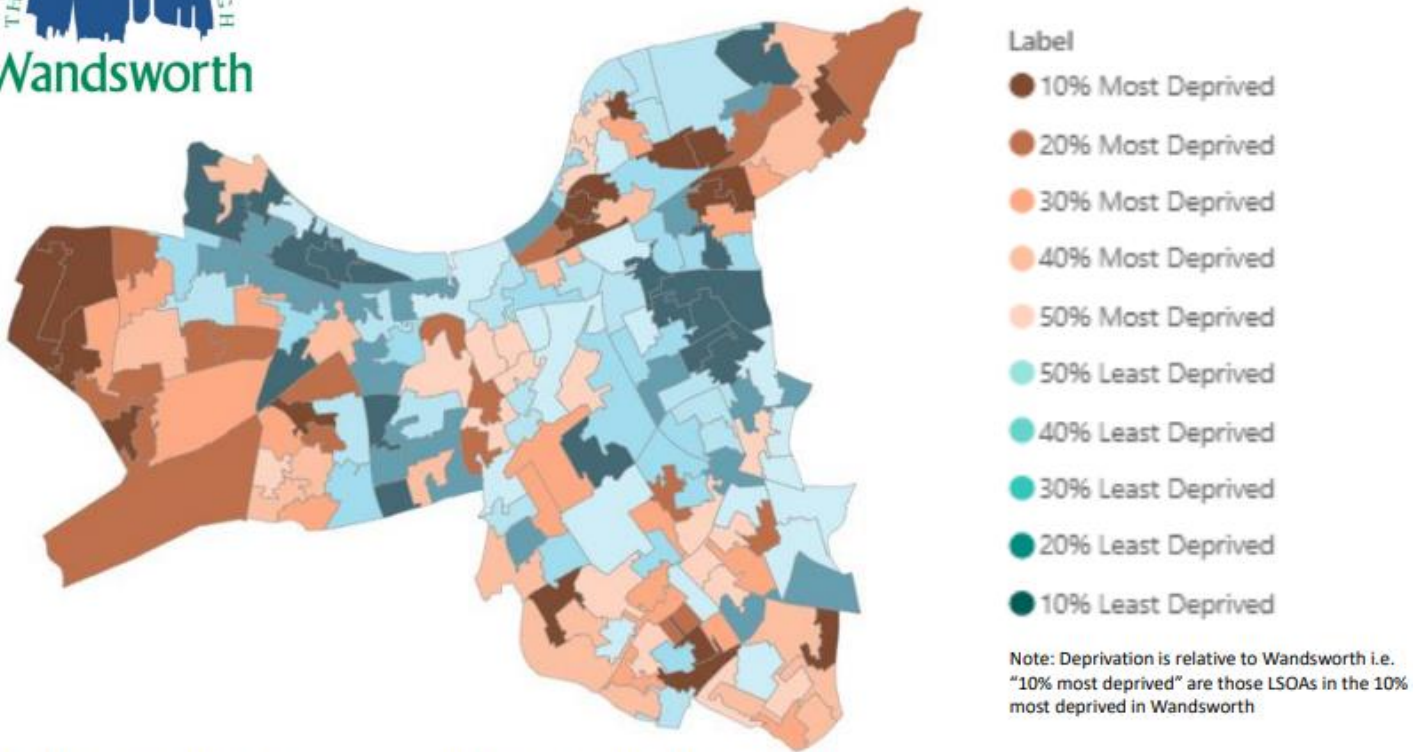
- 10% Most Deprived
- 20% Most Deprived
- 30% Most Deprived
- 40% Most Deprived
- 50% Most Deprived
- 50% Least Deprived
- 40% Least Deprived
- 30% Least Deprived
- 20% Least Deprived
- 10% Least Deprived

Note: Deprivation is relative to Wandsworth i.e. "10% most deprived" are those LSOAs in the 10% most deprived in Wandsworth

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Indices of Multiple Deprivation (IMD) 2019 – Employment Domain, Wandsworth, local comparison



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% population by age group					
AREA	Age band				
	<18 (%)	18-24 (%)	25-44 (%)	45-64 (%)	65+ (%)
Balham	18	6	48	18	9
Bedford	17	7	48	20	8
Earlsfield	20	7	49	17	7
East Putney	17	5	46	20	12
Fairfield	14	6	55	17	7
Furzedown	24	9	33	24	11
Graveney	21	8	44	19	9
Latchmere	21	10	41	19	11
Nightingale	18	6	45	19	11
Northcote	22	5	47	20	6
Queenstown	16	10	47	18	18
Roehampton and Putney Heath	23	20	29	19	10
Shaftesbury	15	7	52	18	8
Southfields	23	5	43	20	9
St Mary's Park	16	8	42	21	12
Thamesfield	19	5	43	22	11
Tooting	20	13	39	18	10
Wandsworth Common	20	5	41	25	9
West Hill	23	7	37	22	11
West Putney	21	8	34	23	14
WANDSWORTH	19	8	43	20	10

Source: GLA 2018-based Housing-led Ward population projections (2020)

Under 18 Population	
Ward	Population aged <18
Balham	2,892
Bedford	2,368
Earlsfield	3,356
East Putney	2,708
Fairfield	2,329
Furzedown	4,089
Graveney	3,258
Latchmere	3,454
Nightingale	2,718
Northcote	3,653
Queenstown	3,560
Roehampton and Putney Heath	3,879
Shaftesbury	2,255
Southfields	3,904
St Mary's Park	3,164
Thamesfield	3,231
Tooting	3,392
Wandsworth Common	3,153
West Hill	3,749
West Putney	3,408
TOTAL	64,520

Source: GLA 2018-based Housing-led Ward population projections (2020)

APPENDIX E – Definitions

Gaming machines

'Gaming machines' means 'a machine which is designed or adapted for use by individuals to gamble (whether or not it can be used for other purposes)' Regulations define four categories of gaming machine: categories A, B, C and D, with category B divided into a further five subcategories. The categories and sub-categories have been defined according to the maximum amount that can be paid for playing the machine and the maximum prize it can deliver as shown below.

There is a minimum age of 18 for all players of category A, B and C machines. There is no minimum age for players of category D machines.

Please note: This information is correct at the time of writing but for up to date information please go to The Gambling Commission website.

Category of machine	Maximum stake	Maximum prize
A - no category A gaming machines are currently permitted	Unlimited	Unlimited
B1	£5	£10,000 (with the option of a maximum £20,000 linked progressive jackpot on a premises basis only)
B2 (Fixed Odd Betting Terminals)	£2	£500
B3A	£2	£500
B3	£2	£500
B4	£2	£400
C	£1	£100
D – non-money prize (other than a crane grab machine or a coin pusher or penny falls machine)	30p	£8
D – non-money prize (crane grab machine)	£1	£50
D – money prize (other than a or a coin pusher or penny falls machine)	10p	£5
D – combined money and non-money prize (other than a coin pusher or penny falls machine)	10p	£8 (of which no more than £5 may be a money prize)
D – combined money and non-money prize (coin pusher or penny falls machine)	20p	£20 (of which no more than £10 may be a money prize)

Casino

A 'casino' is an arrangement whereby people are given the opportunity to participate in one or more casino games. The permitted number of gaming machines in each category will depend on whether it is a large or small casino or a converted casino operating under preserved rights for operating prior to the 2005 Act.

Bingo

'Bingo' means 'any version of that game irrespective of by what name it is described'. The licence authorises a number of category B gaming machine not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Premises in existence before 13 July 2011 are entitled to make available eight category B gaming machines, or 20% of the total number of gaming machines,

whichever is the greater. Regulations state that category B machines at bingo premises are restricted to sub-category B3 and B4 machines but not B3A machines.

Adult Gaming Centre

An 'adult gaming centre' may make available for use a number of category B gaming machine not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Premises in existence before 13 July 2011 are entitled to make available four category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Regulations state that category B machines at adult gaming centres are restricted to sub-category B3 and B4 machines but not B3A machines.

Adult gaming centre's cannot admit those under 18.

Family entertainment centre

A family entertainment centre means 'a premises (other than an adult gaming centre) wholly or mainly used for making gaming machines available for use'.

A licensed family entertainment centre may make available for use an unlimited number of category C or D machines. Family entertainment centres can admit those under 18 years of age but they must not play Category C machines.

A family entertainment centre with a gaming machine permit may make available for use any number of category D machines.

Betting premises

The provision of facilities for betting, whether by making or accepting bets, by acting as a betting intermediary or by providing other facilities for making or accepting bets.

Betting means 'the making or accepting a bet on the outcome of a race, competition or other event or process, the likelihood of anything occurring or not occurring or whether anything is, or is not, true.'

The machines available for use at betting premises are gaming machines and betting machines. The licence authorises a maximum of 4 gaming machines in categories B2, B3, B4, C and D (but not B3A). A betting machine is designed to bet on a future event or on a live event as a substitute for placing a bet over the counter

Persons under 18 will not be able to enter betting premises, although special rules apply to tracks.

Tracks

A 'track' means a 'horse-race course, dog track or other premises on any part of which a race or other sporting event takes place or is intended to take place'. If the track operator who holds a premises licence also has a pool betting operating licence then up to 4 gaming machines of categories B2 to D (but not B3A) may be sited on the track. Betting machines may also be provided.

The Act forbids all persons under 18 to enterprises when betting facilities are being provided, other than at tracks on race days only. The exemption does not extend to areas within a track where category C and above machines are provided

Travelling fair

A 'fair' means 'fair consisting wholly or principally of the provision of amusements' and a fair held on a day in a calendar year is a travelling fair if provided 'wholly or principally by persons who travel from place to place for the purpose of providing fairs and at a place no part of which has been used for the provision of a fair on more than 27 days in that calendar year'. There is no limit on category D machines and persons under 18 may use those machines.

Alcohol licensed premises gaming machine permits

Operators of premises with an on-premises alcohol licence have an automatic right to have 2 gaming machines of category C or D (following notification to the licensing authority). However, a permit is required if the applicant seeks to have more than two machines. A permit authorises the number of C or D machines. Persons under 18 may not play category C machines but may play category D machines.

Prize Gaming

'Gaming is prize gaming if neither the nature nor the size of a prize played for is determined by reference to the number of persons playing or the amount paid for or raised by the gaming'. Persons under 18 may participate in equal chance prize gaming only. Gaming is equal chance gaming 'if it does not involve playing or staking against a bank and the chances are equally favourable to all participants'

Club gaming permit and Club machine permit

The Act separates gaming in Clubs from that in other alcohol licensed premises. The Act creates two types of club for the purposes of gaming: members' clubs (including miners' welfare institutes) and commercial clubs.

A members' club or miners' welfare institute may apply for a club gaming permit which authorises the establishment provide gaming machines equal chance gaming (without having to abide by the stake and prize limits which would apply to exempt gaming in the absence of a permit) and games of chance as prescribed in regulations, namely pontoon and chemin de fer.

A member club or miners welfare institute may apply for a club machine permit. This is more limited that a club gaming permit, authorising the provision of gaming machines only.

In both cases, there is a limit of three gaming machines which may be from categories B3A, B4, C and D (but only 1 B3A machine may be provided). No person under 18 may use category B or C machines.

A commercial club is a club established for commercial gain. Examples include snooker clubs. Commercial clubs may only apply for club machine permits.

APPENDIX F – Responsible Authorities

Authority	Contact Details
The Licensing Authority	Environmental Health (Licensing) Manager, Regulatory Services Partnership (serving Merton, Richmond and Wandsworth Councils) Merton Civic Centre, London Road, Morden, SM4 5DX licensing@merton.gov.uk
Metropolitan Police	Licensing Sergeant, Lavender Hill Police Station, 176 Lavender Hill, London SW11 1JX Telephone: 101 Email: SouthWestSWMailbox-.LicensingGeneral@met.police.uk
London Fire Authority	Fire Safety Regulation: South West Area 4, London Fire Brigade, 169 Union Street, London, SE1 0LL fsr-adminsupport@london-fire.gov.uk
The Local Planning Authority	Planning Department, Wandsworth Council Environment and Community Services Department Town Hall Wandsworth High Street London, SW18 2PU Telephone: 020 8871 7620 Email: planning@wandsworth.gov.uk
Responsible Authority for Noise and Environmental Pollution	Environmental Health (Pollution) Manager, Regulatory Services Partnership (serving Merton, Richmond and Wandsworth Councils) Merton Civic Centre, London Road, Morden, SM4 5DX noiseandnuisance@merton.gov.uk
Protection of Children from Harm	Wandsworth Safeguarding Children Board Town Hall Wandsworth High Street London SW18 2PU Email: wscp@wandsworth.gov.uk
The Gambling Commission	Gambling Commission 4th Floor Victoria Square House Birmingham B2 4BP https://www.gamblingcommission.gov.uk/home.aspx
HM Revenue and Customs	HM Revenue and Customs Excise Processing Teams BX9 1GL United Kingdom email: NRUBetting&Gaming@hmrc.gsi.gov.uk https://www.gov.uk/government/organisations/hm-revenue-customs

APPENDIX G – Advice on Signposting for Operators

Encouraging customers to reflect on their gambling habits is crucial to help them determine the type of support they may need. It is important to identify if they are experiencing or developing symptoms of gambling harm. Along with providing information about safer gambling practices and necessary support, staff should be trained to interact appropriately and know the type of help to offer, including when to refuse service.

The Licensing Authority would also expect that, when our licensing officers are conducting compliance visits to licensed premises, premises are able to evidence that regular interaction with customers is taking place, self-exclusion records are available for inspection, participation in multi-operator self-exclusion schemes (MOSES) can be evidenced and that these records are being regularly reviewed.

To assist our licensed operators in offering appropriate support to their customers, the Council has compiled a list of organisations that offer a diverse range of services. This list is not exhaustive but provides a diverse range of options for those who may be struggling for various reasons. This includes individuals who may be vulnerable due to age, addiction, homelessness, financial vulnerability (including debt), or those who may be concerned about their loved ones and their gambling behaviour.

Organisation	Description	Contact Details
Gamcare	Gamcare is a leading provider of information, advice and support for anyone affected by gambling harms. They operate the National Gambling Helpline, provide treatment for anyone who is harmed by gambling, create awareness about safer gambling and treatment, and encourage an effective approach to safer gambling within the gambling industry.	https://www.gamcare.org.uk/ Contact number: 0203 092 6964
National Gambling Support Service	The National Gambling Helpline gives confidential information, advice and support for anyone affected by gambling problems in England, Scotland and Wales.	https://www.begambleaware.org/ngts Contact Number: 0808 8020 133
Samaritans	Samaritans is a charity dedicated to reducing feelings of isolation and disconnection that can lead to suicide.	https://www.samaritans.org Contact Number: 116 123
Citizen's Advice	Information, advice, self-help tools, about: welfare benefits, housing, employment, debt, family & relationship, the legal system, immigration, health and other matters.	https://www.citizensadvice.org.uk

Gordon Moody	Gordon Moody provide support and treatment for gambling addiction and help people reclaim and rebuild their lives through recovery in a safe, supported environment.	https://gordonmoody.org.uk/ Contact number: 01384 241292
Gamblers Anonymous	Gamblers Anonymous is a fellowship of men and women who share their experience, strength and hope with each other so that they may solve their common problem and help others do the same.	https://www.gamblersanonymous.org.uk Contact number: 0330 094 0322
Big Deal (Gamcare)	BigDeal is a place for young people to find information and support related to gambling, either for themselves or for someone they care about.	https://bigdeal.org.uk/ Contact number: 0203 092 6964
National Debtline	A registered charity providing free, impartial, expert debt advice.	https://www.nationaldebtline.org Contact number: 0800 808 4000
Ocean Recovery Centre	Ocean Recovery is dedicated to providing treatment at alcohol and drug rehabilitation centres across the UK.	https://oceanrecoverycentre.com Contact number: 0800 880 7596
Stepchange	Provides a wide range of debt solutions and services	https://www.stepchange.org Contact number: 0800 138 1111
Priory Group	Priory Group offers a free, confidential addiction assessment to individuals struggling with addiction.	https://www.priorygroup.com Contact number: 0808 149 4141
Streetlink	Support for rough sleepers	https://thestreetlink.org.uk