

Gambling Consultation 2025

General Comment

We appreciate that the council is updating its gambling policy to align with current legislation and guidance. It's important that our local policies reflect the most up-to-date regulations, and we generally support these updates.

Part A

Section 4.1

We support these generally factual / statistical updates, but a useful addition would be links / references to the sources of the information.

Section 4.2

We support these generally factual / statistical updates, but a useful addition would be links / references to the sources of the information.

Section 4.3

We support these factual updates.

Section 5.1

Dates were removed but the text still refers to a date range which appears incomplete.

Part B

Premises Licences

Protecting children and other vulnerable persons from being harmed or exploited by gambling

We appreciate the inclusion of information about the Codes covering content and placement of advertising for gambling products. It's crucial that advertisements are socially responsible, especially regarding protecting children and vulnerable persons. The clarification that complaints about advertising should be directed to the Advertising Standards Agency is helpful for citizens who may have concerns about gambling advertisements. This addition shows the council is considering the broader impact of gambling beyond just the premises themselves.

Part 2

2. Adult Gaming Centres

Concerning Social Responsibility Code Provision: We note the new requirement for non-remote casino, bingo, and betting licenses (except those at a track) and holders of gaming machine general operating licenses for adult gaming centres to offer self-

exclusion schemes. This is a positive step towards responsible gambling and protecting vulnerable individuals which we support.

5. Bingo Premises

Regarding Bingo premises: The clarification on what constitutes 'available for use' in relation to gaming machines is helpful. We appreciate the explanation that a gaming machine is considered available for use if a person can take steps to play it without the assistance of the operator. This provides clarity for both operators and the public which we therefore support

We also support the clarification of no restrictions on the Category C and D machines (low stake / limited prize) machines within this type of premises.

6. Betting Premises

Betting premises: We note and support the update regarding the number of gaming machines allowed in betting premises. The specification that category B machines are restricted to sub-category B2, B3, and B4 machines provide useful clarity.

6. Tracks

Concerning Tracks: We support the inclusion of additional information on betting premises licenses for tracks, particularly the clarification on pool betting. The emphasis on protecting children and vulnerable persons from being harmed or exploited by gambling at these venues is commendable. We also note the important reminder that the Act wholly prohibits the employment of children and young people on tracks which we endorse and support.

Part C

Unlicensed Family Entertainment Centre gaming machine permits (Statement of Principles on Permits – Schedule 10 paragraph 7)

Regarding Unlicensed Family Entertainment Centre gaming machine permits: The added detail about the onus being on the licensee to demonstrate that no more than the permitted number of machines are 'available for use' at any one time is a helpful clarification and we support this as this should assist in ensuring compliance with regulations.

5. Small Society Lotteries

Regarding Small Society Lotteries: We note the added clarification on the registration process for small society lotteries. The requirement for the licensing authority to notify both the applicant and the Commission of the registration as soon as practicable is a positive step towards transparency and efficient communication. This should help ensure all parties are promptly informed of new registrations and we support this.

Commented [MC1]: Category C machines are for low-stake gambling, typically found in places like pubs. Category D machines are the lowest stake and prize machines, often found in family-friendly venues, designed for entertainment rather than serious gambling.

Commented [MC2]: B2 Machines: These are commonly known as Fixed Odds Betting Terminals (FOBTs). Players can bet up to £2 per game, with maximum prizes of up to £500.
B3 Machines: These machines allow for a maximum stake of £2 and a maximum prize of £500.
B4 Machines: These allow for slightly higher stakes (up to £2) and a maximum prize of £400.

Commented [MC3R2]: B2:

- 2005 Act and 1968 Act casinos
- betting shops
- tracks with pool betting.

B3:

- 2005 Act and 1968 Act casinos
- betting shops
- tracks with pool betting
- bingo premises
- adult gaming centre.

B4:

- members' club, miners' welfare club or commercial club
- bingo premises
- adult gaming centre
- betting shops
- tracks with pool betting
- 2005 Act and 1968 Act casinos.
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7. Occasional Use Notices

Concerning Occasional Use Notices: We appreciate the more detailed explanation of Occasional Use Notices (OUNs), as this provides far better clarification and crucial information for event organizers. The specific requirements for OUNs, such as the eight-day limit per calendar year per venue and the need for separate notices for each day of betting activity, provide clear guidelines for compliance. We also note the allowance for temporary use of land as a track, which offers flexibility for events like point-to-point races along with clearer guidelines on how both the authority and the police must be notified. We generally support these additions to the policy.

Conclusion

Overall, these additional updates continue to enhance the clarity and comprehensiveness of the gambling policy and we remain generally in support.