

Renfrewshire Licensing Board

Statement of Principles under the Gambling Act 2005 Section 349

31st January 2025

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RENFREWSHIRE LICENSING BOARD

GAMBLING ACT 2005

STATEMENT OF PRINCIPLES

1. Introduction

- 1.1 The Gambling Act 2005 (“the Act”), which came into full force and effect on 1 September, 2007, created a new system of licensing and regulation for all commercial gambling in Great Britain, other than the National Lottery and spread betting. Section 349 of the Act required all licensing authorities to prepare and publish a Statement of Principles to be applied in exercising their functions under the Act.

The Act provided that a Statement of Principles shall apply for a period of three years and may be reviewed and revised during that period if appropriate.

Renfrewshire Licensing Board (“the Board”) approved its first Statement of Principles on 17th January, 2007 to cover the three-year period from 31st January 2007. In January 2010, 2013, 2016, 2019 and 2022, further Statements of Principles were published for the three year periods to 31st January 2013, 2016, 2019, 2022 and 2025.

As required in terms of Section 349 of the Act, the Board has consulted on and reviewed its Statement of Principles. A list of those consulted is attached at Appendix 1. The following is the Board’s Statement of Principles which it proposes to apply in exercising its functions under the Act during the three year period beginning on 31 January, 2025. This Statement of Principles will be kept under review and revised, if appropriate, during the three year period.

- 1.2 In preparing this Statement of Principles account has been taken of the statutory guidance issued by the Gambling Commission. The current edition of the guidance was published on 1 April 2021 (last updated in 2023, with formatting changes) The current Guidance, which lists the changes made since the previous edition, can be found at <https://www.gamblingcommission.gov.uk/print/guidance-to-licensing-authorities>

- 1.3 In exercising its functions under the Act, the Board will have regard to the statutory licensing objectives set out in Section 1 of the Act, namely:
- 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 being conducted in a fair and open way; and
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 1.4 In accordance with Section 153 of the Act, the Board, in making decisions concerning premises licences, aims to permit the use of premises for gambling in so far as they think 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 this Statement of Principles.
- 1.5 Nothing in the Statement will override the right of any person to make an application under the Act or to have the application considered on its individual merits, undermine the right of any person to make representations on an application or to seek a review of a licence where there is a legal power to do so.
- 1.6 This Statement is intended to be a general Statement of Principles and is not to be regarded as a comprehensive guide to the application of the Act by the Board. Applicants and others should always have regard not only to this Statement of Principles but also to the Act, any regulations made under the Act and any Guidance or Codes of Practice issued by the Gambling Commission. Guidance and Codes of Practice issued by the Gambling Commission may be accessed on the Commission's web site, <http://www.gamblingcommission.gov.uk/>
- 1.7 In producing this Statement of Principles, the Board has had regard to the licensing objectives of the Act, the Guidance issued by the Gambling Commission and any responses from those consulted on this Statement of Principles.
- 1.8 In making decisions under the Act, the Board will have regard to this Statement of Principles but every application will be considered on its own merits. The aim of the Licensing Board in this Statement is to promote the licensing objectives and in particular to address the impact of licensed premises in terms of crime and disorder arising from gambling and ensure that suitable controls are placed

on gambling appropriate to the location and internal layout of gambling licensed premises to address any concerns relevant to the licensing objectives. The Licensing Board is committed to partnership with all stakeholders with a view to the promotion of these aims. The Board recognises the impact that unregulated gambling may have on its community and local plans for growth and regeneration of the economy and, in delivering the gambling regime will, with regard to the principles set out in this Statement, seek to support its local economy and protect children and vulnerable people.

- 1.9 The Act provides that unmet demand is not a criterion of which the Board may take account when considering an application and the Guidance issued by the Gambling Commission states that moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. The Board will therefore not have regard to demand or moral objections when exercising its functions under the Act.
- 1.10 The Board are committed to avoiding duplication with other legislation and regulatory regimes as far as possible and the legal requirements of such other legislation (e.g. Health and Safety legislation) have not been repeated in this Statement of Principles.

2. Renfrewshire Licensing Board

- 2.1 Renfrewshire Licensing Board, which is referred to in this Statement of Principles as "the Board", is the licensing authority for Renfrewshire. Renfrewshire is situated to the West of Glasgow on the south bank of the River Clyde and covers nearly 101 square miles. Renfrewshire's population is estimated at approximately 183,874 (according to 2022 Census information), making it the ninth largest Council area in Scotland in terms of population.
- 2.2 Further information in relation to the proportions of dependent children in households throughout Renfrewshire, and information in relation to the location of schools, premises used by children and young people and premises where support is offered to vulnerable people, such as those with addiction problems, including registered care homes, is provided at Section 13.24 and Appendices 3 and 4 to this Statement. This information is provided to give further information as to the local area profile of Renfrewshire in terms of addiction services, educational establishments and other premises frequented by children and vulnerable people.

3. Consultation on the Statement of Principles

3.1 The Act requires the following parties to be consulted prior to publication of this Statement of Principles:

- the Chief Constable
- one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the Board's area; and
- one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Act.

3.2 The parties consulted in relation to the Statement of Principles are listed in Appendix 1.

3.3 The Board's practice is to have regard to and give appropriate weight to the views of those whom it had consulted. In determining what weight to give to particular representations, the Board's practice is to take account of the following factors:

- who is making the representations (what is their expertise or interest);
- relevance of the factors to the licensing objectives;
- how many other people have expressed the same or similar views;
- how far the representations relate to matters which the Board should be including in its Statements of Principles.

3.4 In considering the views of consultees, the Board's practice is also to consider whether those views should be taken into account and the extent to which the Board are able to deal with the issues raised. For example, the views may relate to a matter which is dealt with under other legislation such as planning.

3.5 The Board's officers consulted as to what should be the terms of the new Statement of Licensing Policy between July 2024 and early October 2024. In response to the consultation, responses were received from Police Scotland (two submissions), The Entain Group and GamCare.

4. Summary of Matters dealt with in Review

4.1 A number of matters have been updated in this Statement, including the introductory description of Renfrewshire, as required. The

Appendices have been updated, where updated information has been provided since the formulation of the previous Statement. Other minor changes have been made to the Statement as required.

- 4.2 Appendix 4 has, in particular, been updated to reflect current local gambling related risks and harms. Updated information in relation to community-based youth spaces has been provided. This will inform applicants and those making representations to applications about what evidence may assist the Licensing Board in considering the licensing of premises or proposed premises.

5. Licensing Authority Functions

5.1 This Board will make decisions upon applications or notifications made for:

- premises licences;
- temporary use notices;
- occasional use notices;
- permits as required under the Act; and
- registrations as required under the Act.

5.2 This Statement of Principles relates to all those licensable premises, notices, permits and registrations identified as falling within the provisions of the Act, namely:

- casinos;
- bingo premises;
- betting premises;
- tracks;
- adult gaming centres;
- licensed family entertainment centres;
- unlicensed family entertainment centres;
- club gaming permits; prize gaming and prize gaming permits;
- occasional use notices;
- temporary use notices; and
- registration of small society lotteries.

5.3 The Board will not be involved in licensing remote gambling. Regulation will fall to the Gambling Commission through operator licences.

6. Child Protection

6.1 In terms of Section 157 of the Act and Regulations under the Act, the Board is required to designate in writing a body which is competent to advise the Board about the protection of children from harm.

6.2 The Board designates Renfrewshire Child Protection Committee. This is an inter-agency body representing the statutory, private and voluntary sectors with a wide knowledge and experience of child protection matters: it has the specialist knowledge and expertise to advise the Board about the protection of children from harm.

7. Responsible Authorities

7.1 Responsible authorities are public bodies that must be notified of applications and which are entitled to make representations to the Board in relation to premises licences and applications for premises licences.

7.2 The responsible authorities in the Board's area are:

1. the Gambling Commission.
2. the Chief Constable, Police Scotland.
3. the Chief Fire Officer, Scottish Fire and Rescue Service.
4. Chief Executive's Service (Economy and Development), Renfrewshire Council.
5. Environment, Housing and Infrastructure, Renfrewshire Council.
6. Renfrewshire Child Protection Committee (see paragraph 6.2 above).
7. Her Majesty's Commissioner of Customs and Excise.
8. any other person prescribed in regulations by the Secretary of State or Scottish Ministers.

8. Interested Parties

- 8.1 Interested parties can make representations about licence applications or apply for a review of an existing licence. A person is an interested party if that person, in the opinion of the Board:
- lives sufficiently close to the premises to be likely to be affected by the authorised activities;
 - has business interests that might be affected by the authorised activities; or
 - represents persons in either of the above two groups.
- 8.2 In determining whether a person is an interested party, the Board will consider each case on its own merits.
- 8.3 In determining whether a person is a “person living close to the premises”, the Board may take account of the following factors:
- size of the premises;
 - the nature of the premises;
 - the distance of the premises from the location of the party making the representation, the topography and the routes likely to be taken;
 - the potential impact of the premises; and
 - the circumstances of the person.
- 8.4 In determining whether a party is a person with business interests that could be affected, factors that may be taken into account include:
- the size of the premises; and
 - the proximity of the premises to any premises of the party making representations.
- 8.5 In deciding whether a person represents a party in either category described in 8.1 above, the Board will make decisions on a case by case basis; in appropriate cases, the Board may require written evidence such as a letter confirming that the person does indeed represent the party. The Board will not request from democratically elected persons, such as Councillors, MPs and MSPs for the constituency or ward likely to be affected, specific evidence that they have been asked to represent an interested party. The Board will similarly consider responses from community councils or from community groups representing vulnerable people living near the premises or proposed premises.

9. Compliance and Enforcement

- 9.1 The Board has powers in terms of Part 15 of the Act to inspect premises, to monitor compliance with the provisions of the Act and, in respect of licence conditions, to investigate suspected offences.

Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation in the exercise of the function. These principles are detailed in 9.2 below. The Board will also have regard to the requirements of the Regulators' Code published by the Department for Business, Innovation and Skills (now the Department for Business, Energy and Industrial Strategy).

- 9.2 The Board will seek to ensure that its approach to compliance and enforcement is:

- proportionate: regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised;
- accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- consistent: rules and standards will be applied fairly and equally to all parties;
- transparent: regulators should be open, and keep regulations simple and user friendly; and
- targeted: regulation should be focused on the problem, and minimise side effects.

- 9.3 The Board will seek to ensure that any inspection programme is risk based. Premises will be subject to a scheme of routine inspection, the frequency of which will be determined by the risks imposed; those premises considered to pose the greatest risk will be subject to more frequent inspections than those presenting a lower risk.

- 9.4 When assessing risk, consideration will be given to:-

- the nature of the gambling activities carried out on the premises;
- the location of the premises in relation to schools and other premises frequented by children and vulnerable persons, such as the premises detailed at Appendix 4;
- the procedures put in place by the management of individual premises to meet the licensing objectives.

- 9.5 The Board, to monitor compliance with its functions under the Act, will work actively with the Gambling Commission's Compliance Officer and other partner agencies to enforce the licensing legislation. The Responsible Authorities shall also monitor the Renfrewshire area for any unlicensed premises or gambling activity and ensure, where this is identified, it is reported to the Gambling Commission or other appropriate agency.

9.6 In accordance with the principle of transparency, copies of any enforcement and compliance protocols adopted by the Board will be made available.

9.7 The Board recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are recognised and resolved at the earliest stage, operators are requested to provide the authority with a single named point of contact and contact details, who should be a senior individual, and whom the Board will contact first should any compliance queries or issues arise.

10. Exchange of Information

10.1 In exercising its functions under the Act, the Board will exchange relevant information with other regulatory bodies. The Board will act in accordance with the provisions of the Act, data protection and freedom of information legislation, the Licensing Board's Privacy Policy and the Guidance and Codes of Practice issued by the Gambling Commission.

11. Equality and Diversity

11.1 Renfrewshire Licensing Board is committed to promoting equal opportunities, valuing diversity and tackling social exclusion. The Board will aim to provide opportunities that meet the diverse needs of different people and groups of people by ensuring that services and employment opportunities are accessible to all. Everyone will be treated fairly and with respect. Diversity needs will be understood and valued. The Board will aim to eradicate all forms of discrimination.

12. Local Risk Assessment

12.1 The Gambling Commission's Licence Conditions and Codes of Practice (LCCP), the most recent version of which became effective from 30th August 2024, formalise the need for operators to consider local risks. Local risk assessments apply to all non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences. This provision came into force on 6 April 2016.

- 12.2 Licensees are required to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in this policy statement.
- 12.3 Licensees must review (and update as necessary) their local risk assessments:
- a) to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b) when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c) when applying for a variation of a premises licence; and
 - d) in any case, undertake a local risk assessment when applying for a new premises licence.
- 12.4 The Social Responsibility Code provision is supplemented by an Ordinary Code provision that requires licensees to share a copy of their own risk assessment which will set out the measures the licensee has in place to address specific concerns. "Ordinary Codes" are not mandatory but operators are expected to follow them unless they can put alternative arrangements in place that are equally effective. This practice should reduce the occasions on which a premises licence review and the imposition of licence conditions is required. The Board expect applicants for a premises licence, or for variation of a premises licence, to lodge their risk assessment with the Board, as licensing authority, along with their application for grant or variation. The Board's officers may also request a copy of a local risk assessment at any time. It is expected that local risk assessments will be kept at individual licensed premises to which they relate and premises managers should be familiar with the individual risk assessments, which should be reviewed and monitored as required.
- 12.5 The licensing authority have an expectation that all local risk assessments will take into account the vicinity of licensed premises to non-gambling premises such as schools, community-based youth spaces, gambling or addiction support or treatment locations and care services where children and vulnerable people are likely to be present. Information about the proportions of dependant children in households in areas throughout Renfrewshire and locations where vulnerable people are likely to be present is provided at Section 13.24 and Appendices 3 and 4 to this Statement to assist licence holders and applicants and those seeking to make representations to the Licensing Board.

The Board expects local risk assessments to set out how people with gambling dependencies are protected within licensed premises, particularly where the premises are located near to facilities for children and vulnerable people.

The Board also encourages within risk assessments (i) proposals between operators for a self-exclusion network for declared 'problem gamblers', particularly in areas where there is a concentration of gambling premises (ii) information on training programmes for staff to ensure that they are able to identify children and other vulnerable people and the action the operator will take to ensure they are not able to enter the premises; (iii) information as to how the operator ensures an adequate number of staff and managers are on the premises at key points throughout the day; (iv) information as to whether the layout, lighting and fitting out of the premises have been designed so as not to attract children and other vulnerable persons who might be harmed or exploited by gambling, and (v) consideration as to whether any promotional material associated with the premises could encourage the use of the premises by children or young people who are not legally allowed to use the premises.

13. Premises Licence General Principles

13.1 In accordance with Section 150 of the Act, Premises licences can authorise the provision of facilities on:

a) casino premises

b) bingo premises

c) betting premises, including tracks and premises used by betting intermediaries

d) adult gaming centre premises (for category B3, B4, C and D machines), gaming machine categories are defined in the Categories of Gaming Machine Regulations 2007 as amended. The definitions as at the date of publication of this Statement are included as Appendix 2.

e) family entertainment centre premises (for category C and D machines) (note that, separate to this category, the Licensing Board may issue a family entertainment centre gaming machine permit, which authorises the use of category D machines only.)

13.2 By distinguishing between types the Act makes it clear that the primary gambling activity of the premises should be that described. Thus, in a bingo premises, the primary activity should be bingo, with gaming machines allowed within the terms of the legislation as an ancillary offer on the premises. This principle also applies to existing casino licences and betting premises licences (referred to in the Commission's Guidance as off-course betting).

Subject to the gaming machine entitlements which various types of licence bring with them (and except in the case of tracks), the Act does not permit premises to be licensed for more than one of the above activities.

- 13.3 Premises licences will be subject to the restrictions set out in the Act and regulations as well as to specific mandatory and default conditions which are detailed in regulations issued under the Act.
- 13.4 The Board may exclude default conditions and also attach other conditions, where it believes it is appropriate.
- 13.5 In making decisions about premises licences, the Board will aim to permit the use of premises for gambling insofar as 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 this Statement of Licensing Principles.
- 13.6 Definition of “Premises” - In the Act “premises” is defined as including “any place”. The Act prevents more than one premises licence applying to any place. However a single building could be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can reasonably be regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, the Gambling Commission states in its current Guidance that licensing authorities should pay particular attention if there are any issues about sub-divisions of a single building or plot and will ensure that mandatory conditions relating to access between the premises are observed.
- 13.7 The Gambling Commission states in its current Guidance to Licensing Authorities that: “In most cases the expectation is that a single building/plot will be the subject of an application for a licence, for example, 32 High Street. But, that does not mean 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as separate premises will depend on the circumstances.” The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter of discussion between the operator and the licensing officer. However, the Commission does not consider that areas of a building that are artificially separated, for example by ropes or moveable partitions, can properly be regarded as separate premises.

13.8 The Board takes note of the Gambling Commission's Guidance to Licensing Authorities which states that licensing authorities should take particular care 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, the Board should be aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and that people do not 'drift' into a gambling area. The plan of the premises should clearly denote entrances and exits. The Board notes that in terms of a mandatory condition of Bingo and Family Entertainment Centre licence under-18s should not have access to areas where category B and C gaming machines are located and that further mandatory conditions of licences require the area to be:

- separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for that purpose
- supervised at all times to ensure that under-18s do not enter the area, and supervised by either:

- one or more persons whose responsibilities include ensuring that under-18s do not enter the areas

- CCTV monitored by one or more persons whose responsibilities include ensuring that under-18s do not enter the areas

- arranged in a way that ensures that all parts of the area can be observed.

A notice must also be displayed in a prominent place at the entrance to the area stating that no person under the age of 18 is permitted to enter the area.

13.9 The Guidance also gives a list of factors which the Board should be aware of, which may include:

- Do the premises have a separate registration for business rates?
- 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?

The Board will consider these and other relevant factors in making its decision, depending on all the circumstances of the case.

13.10 Applicants can apply for a premises licence in respect of premises which have still to be constructed or altered and the Board will determine such applications on their merit.

In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, the Board will

determine applications on their merits, applying a two stage consideration process:-

- First, whether the premises ought to be permitted to be used for gambling
- Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

Applicants should note that the Board is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

More detailed examples of the circumstances in which such a licence may be granted can be found in Chapter 7 of the Gambling Commission's current Guidance.

13.11 In determining premises licences the Board may not have regard to the expected demand for the facilities which the premises is proposed to provide.

13.12 In accordance with the Gambling Commission's Guidance the Board will pay particular attention to the protection of children and vulnerable persons from harm or exploitation by gambling, as well as to issues of crime and disorder.

13.13 The Board has not adopted any specific policy in relation to areas where gambling premises should not be located. However, where representations are received in relation to an application for a premises licence, the application will be considered at a meeting of the Licensing Board. The Act places a duty on the Licensing Board to aim to permit the use of premises for gambling in so far as the Board thinks the application is in accordance with:

- this Policy Statement
- the Commission's Guidance
- the Codes of Practice, and
- where the application is reasonably consistent with the licensing objectives.

As these are the criteria against which an application is to be assessed, representations which address these issues are more likely to be accepted and given weight.

13.14 All representations must be in writing and must be received by the Board within the time limits set by the relevant regulations (normally 28 days from the date the application was received). For a representation to be relevant it should:

- Be positively tied or linked to particular premises, and
- Relate to the licensing objectives (set out at Paragraph 1.3 of this Statement), or

- Raise issues under this policy, the Gambling Commission’s Guidance or Codes of Practice.

13.15 Representations relating to an application should indicate why an application is not “reasonably consistent” with the licensing objectives, or not in accordance with this Policy, the Commission’s Guidance or the relevant Codes of Practice- or why the local risk assessments are not considered suitable and sufficient, or why the application should only be granted subject to certain conditions. It is in the interests of those making representations that they include as much detail and evidence as possible at the time the representation is made. Further information is provided at Paragraphs 13.19 and 13.23-13.24 of this Statement in relation to the content of representations relative to the licensing objectives. Similarly, applicants (and licence holders) should be prepared to explain to the Board how they intend to address or mitigate any risks identified in representations.

Objective 1: Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

13.16 The Gambling Commission will take a leading role in preventing gambling from being a source of crime. Its Guidance envisages that attention is paid to the proposed location of gambling premises in terms of this licensing objective.

13.17 The Board recognises the Gambling Commission’s distinction between disorder and nuisance, disorder meaning activity, which is more serious and disruptive than mere nuisance. The Board will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, to assess a disturbance.

13.18 In considering licence applications, the Board will particularly take into account the following:-

- the design and layout of the premises;
- the training given to staff and crime prevention measures appropriate to those premises;
- physical security features installed in the premises, which may include matters such as position of cash registers or the standard of CCTV installed in the premises;
- where premises are subject to age restrictions, the procedures in place to conduct age verification checks; and
- the likelihood of any violence, public order or policing problem if the licence is granted.

13.19 The Board will, in relation to this Licensing Objective, give due weight to any representations received in respect of an application from Police Scotland (including evidence of gambling as a source of crime or disorder, being associated with crime or disorder or used to support crime), and the other relevant authorities when making decisions in this regard. The Board may consider whether specific controls, such as a requirement for the provision of door supervisors, need to be applied in order to prevent premises being a source of crime or used to support crime, causing adverse consequences for the localities in which premises are located, in order to ensure reasonable consistency with this Licensing Objective. Applicants would be expected to demonstrate how they will address and mitigate any risks identified in relation to this Licensing Objective.

Objective 2: Ensuring that gambling is conducted in a fair and open way

13.20 The Gambling Commission has stated that it would generally not expect licensing authorities to be concerned with ensuring that gambling is conducted in a fair and open way as this will relate either to the management of the business, therefore subject to an operating licence, or to an individual and therefore subject to a personal licence. The Board recognises that both of these matters are the responsibility of the Gambling Commission.

Objective 3: Protecting children and other vulnerable persons from being harmed or exploited by gambling

13.21 The Board considers that this objective, insofar as relating to children, includes preventing children from taking part in gambling unlawfully (as well as advertising likely to be attractive to children not being displayed at a time when children are likely to be near the premises). The Board will consider, as suggested in the Gambling Commission's Guidance, whether specific measures are required at particular premises, with regard to this licensing objective as it relates to children. The Board will consult the Renfrewshire Child Protection Committee on any application where it considers there may be concerns over access for children or vulnerable persons. The Board is also aware of the Gambling Commission Codes of Practice as regards this licensing objective, in relation to specific premises.

13.22 As regards the term "vulnerable persons" it is noted that the Gambling Commission does not seek to offer a definition but states that it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who

may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs. The Board will consider this licensing objective on a case by case basis.

In doing so, the Board will give due weight to representations which highlight risks to this licensing objective.

- 13.23 The Board will judge the merits of each individual application before reaching a decision on it, including whether to impose conditions to protect children or vulnerable persons. Any controls which might be required may also depend on the type of premises being considered and, in particular, whether and to what extent children are allowed in those premises. Such conditions may require, particularly in relation to children: supervision of entrances; segregation of gambling areas from areas frequented by children; restrictions on advertising where children and/or vulnerable persons may be near premises, and supervision of gaming machines in non-adult gambling specific premises.

In respect of “vulnerable persons”, the Board will also have particular regard to representations relating to the internal layout of premises, as well as any concerns in relation to the location of applicant premises.

- 13.24 Representations should address why any conditions should be imposed to ensure the gambling activity on premises is “reasonably consistent” with the licensing objectives, with supporting evidence of any gambling related risks or harms relating to the premises or the area of the premises. For the assistance of those making representations, Appendices 3 and 4 contain details of schools and locations offering support to vulnerable people within Renfrewshire and maps of areas in Renfrewshire with a higher proportion of dependent children. Those making representations may consider referring to these Appendices in their representations, if they consider that premises in these areas require additional controls and applicants (and licence holders) should be prepared to demonstrate how they will address any identified concerns or mitigate the risks within the terms of their local risk assessments and in any submissions they may wish to make at any hearing before the Licensing Board.

Conditions on Premises Licences

- 13.25 Any conditions attached to licences will be proportionate and will be: -
- relevant to the need to make the premises suitable as a gambling facility;
 - directly related to the premises and the type of licence applied for;
 - fairly and reasonably related to the scale and type of premises; and
 - Reasonable in all other aspects

- 13.26 Decisions on individual conditions will be made on a case-by-case basis. The control measures, which the Board may consider imposing, include door supervisors and appropriate signage for adult only areas. Licence applicants will be invited to offer their own suggestions as to ways in which the licensing objectives can be effectively met (and require to share their local risk assessments with the licensing authority on an application for grant or variation of a premises licence, or upon a request by this licensing authority).
- 13.27 The Board may consider imposing specific conditions for buildings which are subject to multiple premises licences. Such conditions may include the supervision of entrances, segregation of gambling and non-gambling areas frequented by children, the supervision of gaming machines and the display of notices regarding age restriction.
- 13.28 The licensing authority will seek to avoid any duplication with other statutory/regulatory regimes where possible, including the statutory planning regime. The Board will also have regard to the Gambling Commission's guidance that it is extremely unlikely that they will need to impose additional conditions in relation to matters already dealt with by the mandatory conditions.

Door Supervisors

- 13.29 The Board will consider whether there is a need for door supervisors in terms of the licensing objectives relating to children and vulnerable persons and the prevention of crime.

14. Adult Gaming Centres

- 14.1 The Board will have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to demonstrate that there will be sufficient measures to ensure that persons under 18 years of age do not have access to the premises.
- 14.2 Sufficient measures that will be imposed as appropriate licensing conditions may include proof of age schemes, CCTV, door supervisors, supervision of entrances/machine areas, physical separation of areas, location of entry notices/signage and specific opening hours.

- 14.3 The measures detailed in 14.2 above are not exhaustive and are not intended to exclude other conditions in appropriate cases.

15. Family Entertainment Centres

- 15.1 The Board will have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to demonstrate that there will be sufficient measures to ensure that persons under 18 years of age do not have access to the adult only gaming machine areas.
- 15.2 Licence applicants will be invited as part of their application to offer their own suggestions upon measures to proactively mitigate risks to the licensing objectives. Sufficient measures that will be imposed as appropriate include CCTV, supervision of entrances/machine areas, physical separation of areas, location of entry notices/signage, specific opening hours, and measures/training for staff on how to deal with suspected school children on the premises.
- 15.3 The measures detailed in 15.2 above are not exhaustive and are not intended to exclude other conditions in appropriate cases.
- 15.4 In accordance with the Gambling Commission's Guidance, the Board will ensure that it is sufficiently aware of any conditions that apply to operating licences, for instance those covering the way in which the area containing the category C or higher machines, should be delineated.

16. Casinos

The Board has not passed a "no casino" resolution under Section 166 of the Act.

17. Bingo Premises

- 17.1 This licensing authority notes that the Gambling Commission's Guidance states that Licensing Authorities will need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences for that or those excluded areas.
- 17.2 In the unusual circumstance where an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises), it is not permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises.
- 17.3 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. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises in order to prevent underage gambling. Where concerns are raised, the Board will consider attaching additional conditions to achieve the policy objectives set out at Chapter 18 of the Commission's current Guidance and to ensure the risk to the licensing objectives is minimised.

18. Betting Premises

- 18.1 The Act contains a single class of licence for betting premises. Different types of premises will require licensing, including betting offices on tracks that have a separate premises licence from the track licence. It is not permissible for the operator to offer gaming machines on a premises which is licensed for betting but not to offer sufficient facilities for betting.
- 18.2 Section 181 contains an express power for licensing authorities to restrict the number of self-service betting machines, their nature and the circumstances in which they are made available by attaching a licence condition to a betting premises licence or to a casino premises licence (where betting is permitted in the casino).
- 18.3 When considering whether to impose conditions to restrict the betting machines in particular premises, the Board will consider the ability of staff to monitor the use of machines by children and young people or by vulnerable persons.

19. Tracks

- 19.1 The Act contains rules which apply to applicants for a premises licence in relation to a track. The applicant need not hold an operating licence because the betting which is provided upon the track will be provided by other operators, who come on-course. Since those people will require the necessary operating licences, the Act allows the track operator to obtain a premises licence without also having to hold an operating licence. This track premises licence then authorises anyone upon the premises with the appropriate operating licence to offer betting facilities.
- 19.2 Tracks are different from other premises in that there may be more than one premises licence in effect, each covering a specified area of the track. In accordance with the Gambling Commission's Guidance, the Board will especially consider the impact of the third licensing objective in this area.
- 19.3 There may be some specific considerations with regard to the protection of children and vulnerable persons from being harmed or exploited by gambling, the need to ensure entrances to each type of premises are distinct and that children are excluded from gambling or betting areas where they are not permitted to enter.
- 19.4 Children and young persons will be permitted to enter track areas where facilities for betting are provided on days when events take place, although they are still prevented from entering areas where gaming machines (other than category D machines) are provided. A track premises licence does not automatically allow gaming machines to be provided, but gaming machines may be permitted where a pool betting operating licence is also held by the track owner. Premises licence applicants will have to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities.
- 19.5 Appropriate licence conditions may include proof of age schemes, CCTV, door supervisors, supervision of entrances/machine areas, physical separation of areas, location of entry notices/signage, specific opening hours and the location of gaming machines.
- 19.6 This list is not exhaustive and does not intend to exclude other conditions in appropriate cases.

Condition on Rules being displayed

- 19.7 In accordance with the Gambling Commission's Guidance, the Board will attach a condition to track premises licences requiring the track operator to ensure that the rules are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public.

20. Travelling Fairs

- 20.1 The Board will consider whether the application falls within the statutory definition of a travelling fair.
- 20.2 Where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the Board will decide whether the statutory requirement, that the facilities for gambling amount to no more than an ancillary amusement at the fair, is met.
- 20.3 The 27-day statutory maximum for the land being used for a fair per calendar year shall apply 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.

21. Provisional Statements

- 21.1 Section 204 of the Act provides that a person may make an application to the licensing authority for a provisional Statement in respect of premises that he or she expects to be constructed, expects to be altered or expects to acquire a right to occupy. In accordance with the current Guidance issued by the Commission, a premises licence to use premises for gambling should only be issued in relation to premises that the Board can be satisfied are going to be ready to be used for gambling in the reasonable near future, consistent with the scale of building or alteration required before the premises are brought into use. The Board will consider, in relation to premises not yet ready for use for gambling, whether a provisional statement should be applied for, rather than a premises licence.
- 21.2 In terms of representations about premises licence applications following the grant of a provisional statement, no further representations from relevant authorities or interested parties will 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.

21.3 The Board may refuse the premises licence or grant it on terms different to those attached to the provisional statement only by reference to matters:-

- which could not have been raised at the provisional licence stage; or
- which, in the Board's opinion, reflects a change in the operator's circumstances.

21.4 The Gambling Commission's Guidance states that licensing authorities must not have regard to whether or not a proposal by an applicant is likely to be permitted in accordance with planning or building law.

22. Reviews

22.1 A premises licence may be reviewed by the Board of its own accord for any appropriate reason or following the receipt of an application for a review by an interested party or responsible authority. It is for the Board to decide whether the review should be carried out.

22.2 Section 200 of the Act provides that licensing authorities may initiate a review in relation to a particular class of premises licence or in relation to particular premises.

22.3 An application for a review may be rejected if the Board is of the view that the grounds on which the review is sought:-

- are not relevant to the principles that must be applied by the licensing authority in accordance with Section 153;
- are frivolous or vexatious;
- will certainly not cause the authority to revoke or suspend the licence or exclude, remove or amend a condition attached to the licence, or add a condition to the licence;
- are substantially the same as the grounds specified in an earlier application in respect of the same premises or are substantially the same as representations made in relation to the application for the premises licence.

- 22.4 In determining whether to exercise the power to reject an application for review, the Board will take into account the length of time that has elapsed since the making of the earlier application or since the making of the representation.

23. Unlicensed Family Entertainment Centre Gaming Machine Permits

- 23.1 Where the operator of a family entertainment centre (FEC) does not hold a premises licence but wishes to provide gaming machines, he or she may apply to the licensing authority for this permit. The applicant must demonstrate that the premises will be wholly or mainly used for making gaming machines available for use.
- 23.2 Unlicensed FECs will be able to offer only category D machines in reliance of a gaming machine permit. Any number of category D machines can be made available with such a permit. Permits cannot be issued in respect of vessels or vehicles.
- 23.3 The Board can grant or refuse a licence but cannot attach conditions to this type of permit.
- 23.4 The Board will expect the applicant to demonstrate that there are policies and procedures in place to protect children from harm. Harm is not limited to harm from gambling, but includes wider child protection considerations.

24. Prize Gaming Permits

- 24.1 The Act states that a licensing authority may prepare a statement of principles that they propose to apply in exercising their functions in considering applications for permits which in particular specifies matters that the licensing authority propose to consider in determining the suitability of the applicant for a permit.
- 24.2 The applicant should set out the types of gaming that he or she is intending to offer and should be able to demonstrate an understanding of the limits to stakes and prizes that are set out in regulations and should demonstrate that the gaming offered is within the law. In making a decision on the application for this permit the Board will have regard to any Gambling Commission Guidance.

25. Temporary Use Notices

- 25.1 Where a gambling operator does not hold a premises licence but wishes to use the premises temporarily for providing facilities for gambling he or she may apply for a temporary use notice which may only be granted if the applicant holds a relevant operating licence.
- 25.2 The legislation and the Gambling Commission's Guidance define premises as including "any place" and refer to a "set of premises". The Board will consider amongst other things, the ownership/occupation and the control of the premises when determining any particular case.
- 25.3 A set of premises may not be the subject of a temporary use notification for more than 21 days in a period of 12 months. In consideration of temporary use notice applications, the Board will apply any regulations made under the provisions of the Act.

26. Occasional Use Notices

- 26.1 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.
- 26.2 The Board will ensure that the statutory limit of eight days in a calendar year is not exceeded and will consider the definition of a "track" in determining whether the applicant is permitted to avail him/herself of this notice.

27. Small Society Lotteries

- 27.1 A non-commercial society that runs a lottery where the income is below certain specified thresholds can register with the Licensing Board.

- 27.2 The financial limits that apply to these societies at the time of preparation of this Statement are that the proceeds from one individual lottery cannot exceed £20,000 and in a calendar year the total proceeds do not exceed £250,000. If these limits are likely to be breached, then the Society requires to apply to the Gambling Commission for a Lottery Operating Licence. Societies cannot hold both these permissions at the same time.

As the limits stated above have previously been consulted upon and could change, any person seeking to register a small society lottery should check the up to date limits on the Gambling Commission's website, at www.gamblingcommission.gov.uk or Renfrewshire Council's Licensing Standards Officers at enforcement.licensing.cs@renfrewshire.gov.uk, who will be able to provide further information.

- 27.3 Registration requires the Society to name a person responsible for the promotion of the lottery and to submit lottery returns within three months of the date of the (last) lottery draw. Should that person no longer be responsible for promoting the lottery, then the Society is required to notify the licensing authority and name a new promoter as soon as possible.

28. Declaration

- 28.1 The Board declares that, in producing its policy statement, it has had regard to the Licensing Objectives set out at Paragraph 1.3, the Guidance issued by the Gambling Commission and the responses received from those consulted in the preparation of the Statement.

LIST OF CONSULTEES

1. All Renfrewshire Licensing Board Members
2. All Renfrewshire Council Elected Members
3. Renfrewshire Council Chief Executive
4. All Renfrewshire Council Directors
5. All Gambling Premises Licence Holders within Renfrewshire
6. The Gambling Commission
7. Chief Constable, Police Scotland
8. The Chief Fire Officer, Scottish Fire and Rescue
9. HM Revenue and Customs National Registration Unit*
10. Church of Scotland, 121 George Street, Edinburgh
11. Diocese of Paisley, Diocesan Office, Cathedral Precinct, Ingle Street, Paisley
12. Betting and Gaming Council, 1st Floor, 90 Chancery Lane, London, WC2A 1EU
13. All Renfrewshire Community Councils
14. Renfrewshire Child Protection Committee
15. General Secretary, Scottish Trades Union Congress, 333 Woodlands Road, Glasgow, G3 6NG
16. Renfrewshire Chamber of Commerce, Bute Court, St. Andrew's Drive, Paisley, PA3 2SW
17. Scottish Enterprise
18. Gamcare, 1st Floor, 91-94 Saffron Hill, London, EC1N 8QP
19. Gamblers Anonymous Scotland, St Columbkilles Halls, 2 Kirkwood Street, Rutherglen, Glasgow, G73 2SL
20. Renfrewshire Family Group Conference Service, Women & Children First
21. Paisley YMCA, 39 High Street, Paisley, PA1 2AF
22. Young Persons' Representatives (c/o Children's Services)
24. All Local Partnerships
25. All Tenants' and Residents' Associations
26. Federation of Local Associations in Renfrewshire*
27. Renfrewshire Community Planning Partnership, c/o Committee Services
28. Renfrewshire Citizens' Advice Bureau
29. Greater Glasgow and Clyde NHS Board
30. Renfrewshire Community Safety Hub
31. Renfrewshire Alcohol and Drug Partnership
32. DEAR Group (Diversity and Equality Alliance Renfrewshire)
33. Disability Resource Centre
34. Engage Renfrewshire
35. LGBT+ Renfrewshire
36. Members of the Scottish Youth Parliament (per Fiona Taylor)
37. PACHEDU
38. Renfrewshire Access Panel
39. Renfrewshire Effort to Empower Minorities (REEM)
40. Renfrewshire Interfaith Group
41. Family PL Renfrewshire
42. Renfrewshire Youth Voice (per Fiona Taylor)
43. Reaching Older Adults in Renfrewshire
44. Soroptimist Paisley
45. West of Scotland Regional Equality Council (WSREC)
46. Women's Aid
47. YouFirst Advocacy

- 48. NHS Greater Glasgow & Clyde
- 49. Renfrewshire Council Head of Child Care and Criminal Justice
- 50. Renfrewshire Health and Social Care Partnership

*Members may wish to note that correspondence sent to the National Registration Unit (9, above) was returned to the licensing authority and that the members of the Federation of Local Associations (26, above) were consulted individually.

CURRENT GAMING MACHINE CATEGORIES AND ENTITLEMENTS

Category of machine	Maximum stake (from April 2019)	Maximum prize (from Jan 2014)
A	Unlimited – No category A gaming machines are currently permitted	Unlimited – No category A gaming machines are currently permitted
B1	£5	£10,000 [†]
B2	£2	£500
B3A	£2	£500
B3	£2	£500
B4	£2	£400
C	£1	£100
D – non-money prize	30p	£8
D – non-money prize (crane grab machines only)	£1	£50
D – money prize	10p	£5
D – combined money and non-money prize	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 machines only)	20p	£20 (of which no more than £10 may be a money prize)

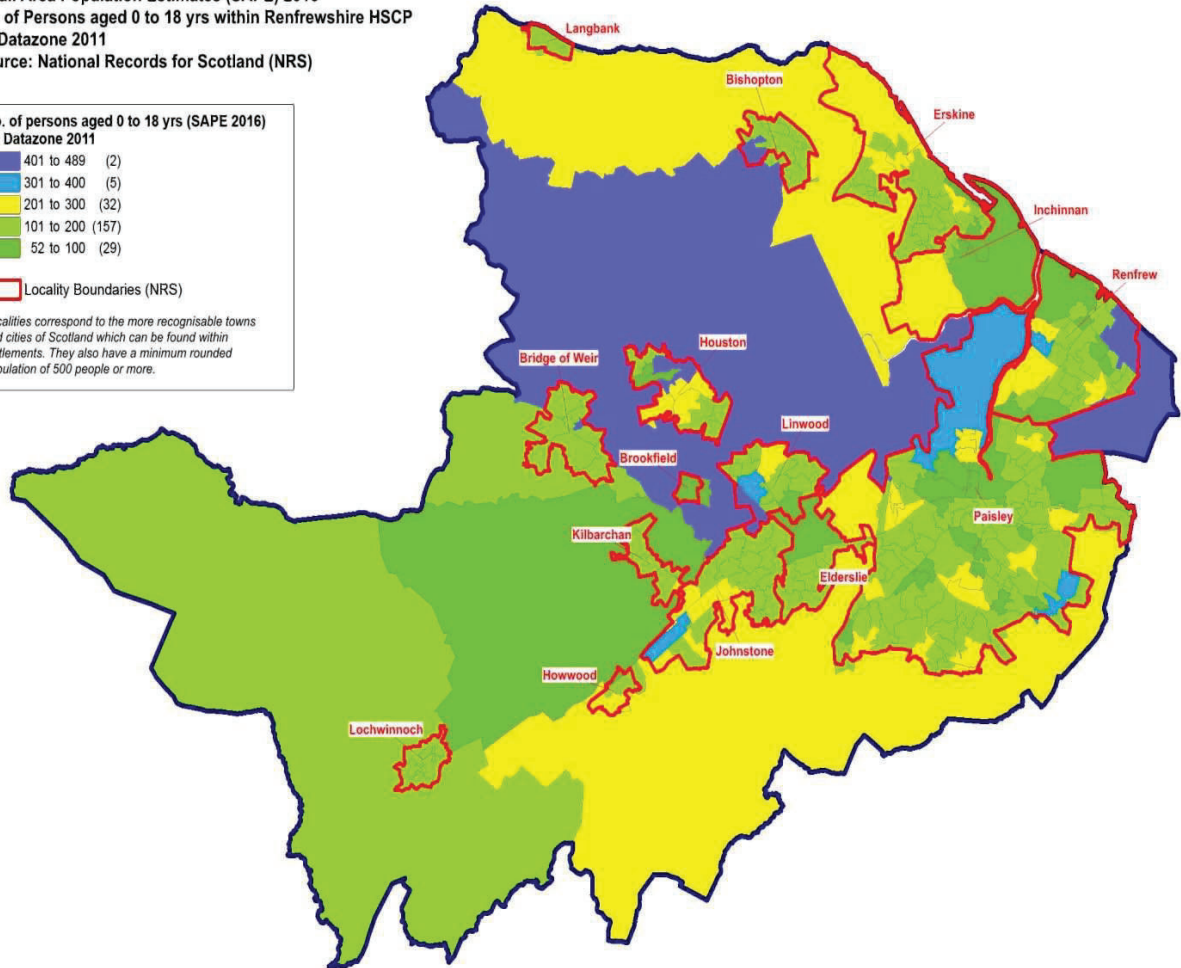
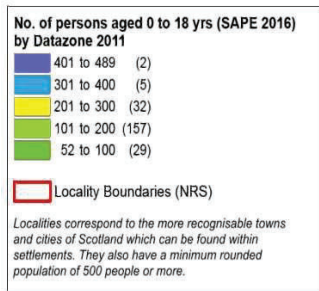
Note- As these limits may change from time to time, operators or other parties should refer to the Gambling Commission’s website for updates to the above information.

APPENDIX 3

LOCATIONS OF HOUSEHOLDS WITH DEPENDENT CHILDREN

Map 1

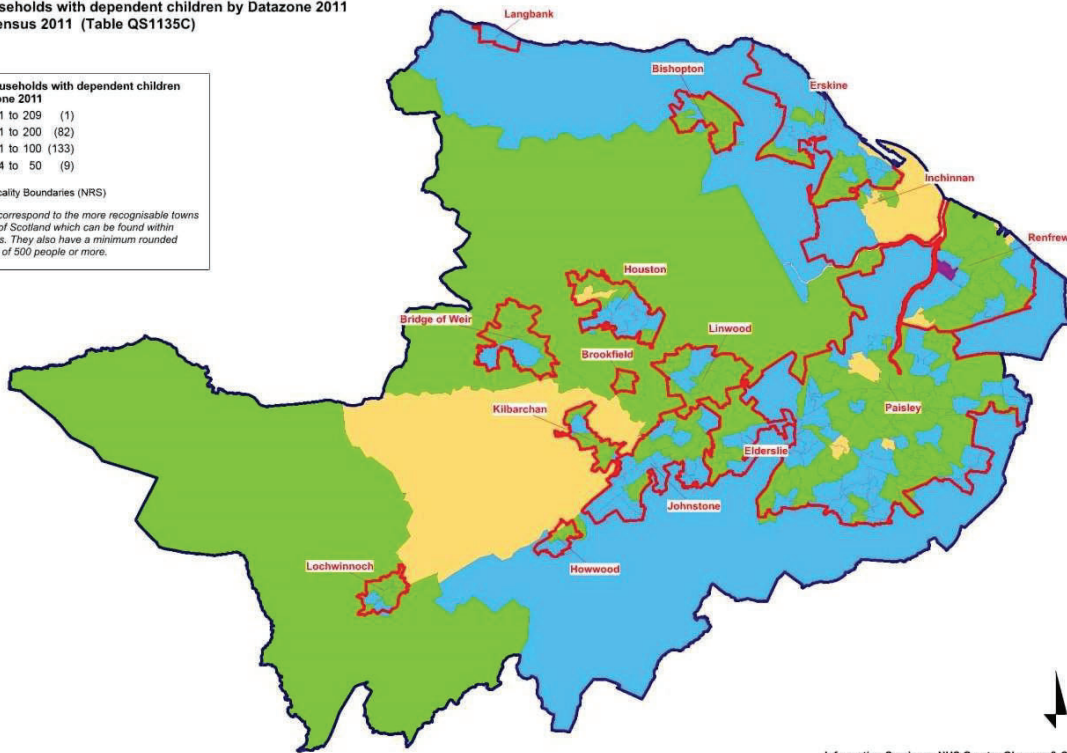
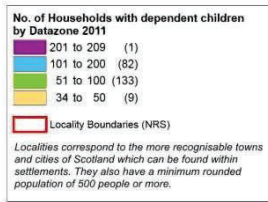
Small Area Population Estimates (SAPE) 2016
No. of Persons aged 0 to 18 yrs within Renfrewshire HSCP
by Datazone 2011
Source: National Records for Scotland (NRS)



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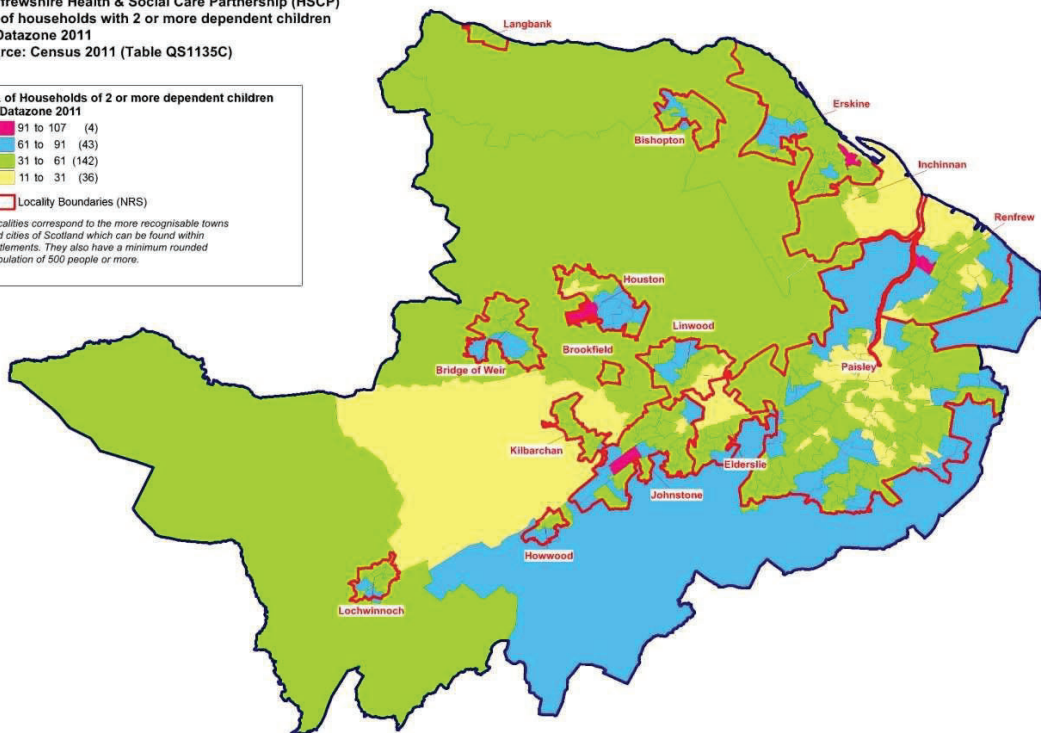
Map 2

NHS GREATER GLASGOW & CLYDE
Renfrewshire Health & Social Care Partnership (HSCP)
No. of households with dependent children by Datazone 2011
Source: Census 2011 (Table QS1135C)



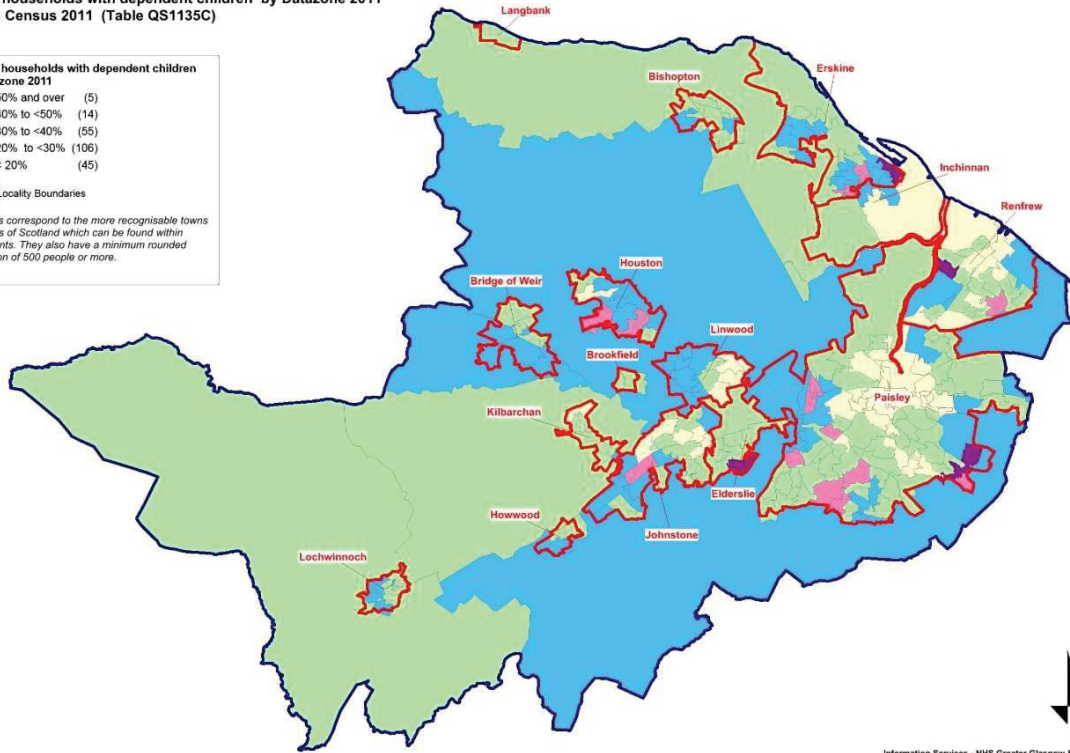
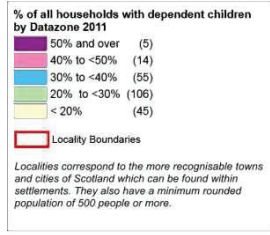
Map 3

Renfrewshire Health & Social Care Partnership (HSCP)
No. of households with 2 or more dependent children by Datazone 2011
Source: Census 2011 (Table QS1135C)



Map 4

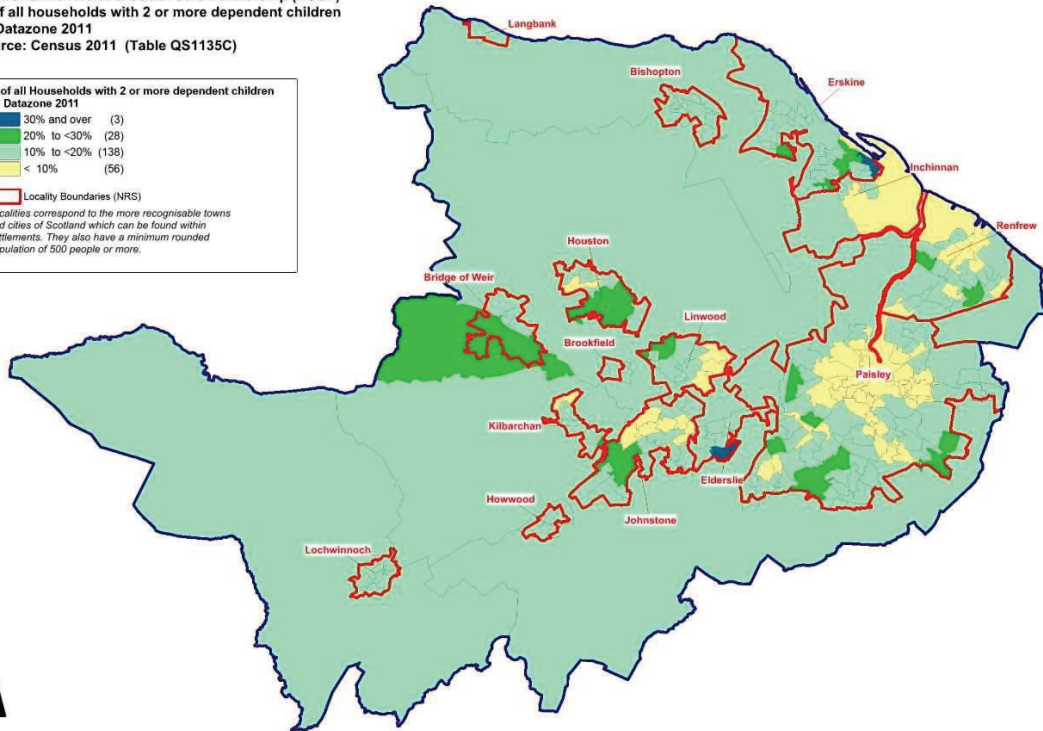
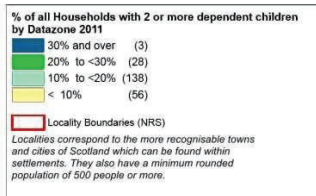
Renfrewshire Health & Social Care Partnership (HSCP)
 % of all households with dependent children by Datazone 2011
 Source: Census 2011 (Table QS1135C)



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Map 5

Renfrewshire Health & Social Care Partnership (HSCP)
 % of all households with 2 or more dependent children by Datazone 2011
 Source: Census 2011 (Table QS1135C)



P.B. (08/08/2018) Information Services - NHS Greater Glasgow & Clyde
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LOCATIONS OF SCHOOLS, CENTRES FOR CHILDREN AND YOUTH
ACTIVITIES, REGISTERED CARE SERVICES, VOLUNTARY AGENCIES, ETC

Information on the early learning and child care services, primary schools and secondary schools in Renfrewshire, including their location, can be accessed via the link below:

<http://www.renfrewshire.gov.uk/schools>

People with a gambling addiction can undertake treatment at the RCA Trust at premises at 8 Ince Street, Paisley, PA1 1HP

Counselling is provided by Gamblers Anonymous in Ralston Community Centre, Allanton Avenue, Paisley, PA1 3BL.

Details of registered care homes for children/older adults and vulnerable adults can be obtained at the following link: www.careinspectorate.com

Renfrewshire HSCP provide mental health outpatient services within the following venues:

Charleston Centre, Neilston Road, Paisley PA2 6LY.

Dykebar Hospital, Grahamston Road, Paisley, PA2 7DE

Mile End Mill, 12 Seedhill Road, Paisley PA1 1JS

Royal Alexandria Hospital. Corsebar Road, Paisley, PA2 9PN.

Renfrewshire Learning Disability Services provide services within the following venues:

Anchor Centre (Anchor Service and Flexicare) - 51-55 Stock St, Paisley PA2 6NG

Milldale Day Opportunities - On-X Leisure Centre, Brediland Rd, Linwood PA3 3RA

Mirin Day Opportunities - Lagoon Leisure Centre, 11 Christie St, Paisley PA1 1NB

Paton's Resource Centre (Community Networks) - Cartside Avenue, Johnstone, Renfrewshire, PA5 8RN

Spinners Gate Resource Centre (Gateway ISS and Autism Connections) - Maxwellton Road, Paisley, PA1 2RH

Weavers Linn Respite, 65 Glenburn Rd, Paisley PA2 8TJ

Renfrewshire HSCP provide addiction services within the following venues:

Back Sneddon Centre, 20 Back Sneddon Street, Paisley, PA3 2DJ

CIRCLE, 81 Glasgow Rd, Paisley, PA1 3PE

New Sneddon Street Clinic, 8 New Sneddon Street, Paisley, PA3 2AD

Torley Unit Centre, Dykebar Hospital, Grahamston Road, Paisley, PA2 7DE

DETAILS OF COMMUNITY-BASED YOUTH SERVICES

Renfrewshire Council's Adult and Family Learning Service deliver Adult Literacies and Family Learning Programmes to vulnerable children, adults and families in the following communities:

- West Johnstone Learning Centre (part of the West Johnstone Joint Campus)
- Foxlea Learning Centre (Foxbar)
- Moorpark Learning Centre (part of the Moorpark Joint Campus Renfrew)
- Glenburn Learning Centre
- (Bargarran Learning Centre (Part of Bargarran Community Centre)

Renfrewshire Council's Youth Services currently support the following community-based youth work activities and projects to vulnerable and young people who experience barriers to participation. These groups are offered at the following community youth spaces and venues:

- Foxbar Youth Drop In: and Youth Groups, Duke of Edinburgh Open Group, LGBTQi
- Gozone (part of Glenburn Learning Centre): Youth groups, Climate Change Champions
- Bargarran Youth Space (Bargarran CC): Youth Groups, Erskine Youth Council
- Youth Services Office in West Primary School: Youth Groups, Renfrewshire Youth Voice, Members of Scottish Youth Parliament
- Mary Russell School: Senior and Junior Youth Clubs
- Riverbrae School: Senior and Junior Youth Clubs