

Review of Gambling Policy 2013-2016

APPENDIX 2

Consultation Summary

Ref No	Date Received	Name of Organisation	Logged By
1	08/08/12	Racecourse Association	AMR
2	28/09/12	Nottingham CDP	AMR
3			



The Racecourse Association Limited
Winkfield Road, Ascot, Berkshire, SL5 7HX

8 August 2012

The Licensing Officer
Derwent Building
Talbot Street
London Road
Nottingham
NG2 3AH

Dear Sir/Madame,

Revision of Statement of Gambling Licensing Policy - Consultation

I am writing on behalf of the Racecourse Association, the trade association for horse racecourses in Great Britain. We have reviewed the revision of statement of gambling licensing policy for Nottingham City Council, to which we would like the opportunity to respond on behalf of our members.

Location (Paragraphs 5.18, 5.25) – The proposed location of gambling premises may be taken into account when assessing the application. The Councils are asked to consider that the location of racecourses will not have altered since its foundation, and cannot be transferred to another location.

Conditions (Paragraph 9.5) - In certain circumstances the Council may impose additional conditions on racecourses to ensure the licensing objectives are met. The Council is asked to ensure that these conditions do not exceed those premises license conditions outlined in the Premises License Mandatory and Default Conditions.

Door Supervisors (Paragraph 9.10) - The Councils are asked to be aware that under the Licensing Act 2003 and the Private Security Industry Act 2001, racecourses are already required to provide licensed door supervisors in some roles.

Betting machines (Paragraph 9.15) - The Councils are asked to note that racecourses do not hold Operating Licenses and consequently any betting machines on racecourses will be provided by other operators. The racecourses will contractually require these operators to fulfil any conditions with regard to the provision and supervision of these machines.

Should you wish to discuss the comments raised any further, please feel free to contact either myself or my colleague Holly Cook on 01344 873536 or holly.cook@racecourseassociation.co.uk

Kind Regards,

Paul Swain



NOTTINGHAM CITY COUNCIL STATEMENT OF GAMBLING POLICY

FEEDBACK FORM (to be received by the Licensing Officer by 30 September 2012)

<p>Name Address</p>	<p>The Shire Hall High Pavement Nottingham NG1 1HN</p>
<p>Organisation (if applicable)</p>	<p>The Nottingham City Crime and Drugs Partnership (CDP)</p>
<p>Daytime Telephone Number</p>	<p>0115 8765731</p>
<p>Email Address</p>	<p>alex.castle-clarke@nottinghamcity.gov.uk</p>
<p>YOUR COMMENTS - PLEASE IDENTIFY THE PARAGRAPH OF THE POLICY YOU WISH TO COMMENT ON</p>	
<p>Section of Policy 2.1</p>	<p><u>Comments</u> <i>In response to the objective to 'Prevent gambling from being a source of crime and disorder, being associated with crime and disorder or being used to support crime'</i></p> <p>The CDP analytical team has conducted analysis into crimes and antisocial behaviour (ASB) that occurred at licensed gambling premises. According to information received from the Police there are a total of 86 licensed gambling premises that fall within the City Division of Nottingham. Between 1 July 2011 and 30 June 2012 there were 118 crimes for which the crime address was listed as one of these premises. This accounts for less than 0.5% of All Crime during this time. Theft (specifically Theft Other) is the most prominent offence in all premises, followed by Criminal Damage and Violence. The Theft Other crimes show that the majority of these involved the taking of an unattended mobile phone or wallet. It could be said that the individual crime types are quite 'low level', with the Violence offence</p>

most frequent; Common Assault – the least 'serious' of the Violence types. The majority of these Violence offences occurred at the **City Centre** locations.

In regards to '**Repeat Locations**' there were six premises that recorded 5 or more crimes within the 12 month period. These were Nottingham Racecourse (10 crimes), Belfred Radford Road, Gala Casino, Alea Casino (all 9), Dusk Til Dawn Casino (6) and Coral Bookmakers Parliament Street (5). In total, these six premises accounted for 39% of all the crimes. For the top location, the **Racecourse**, all of these were **Theft** Offences, be it from person, vehicle or other. **Violence** offences were the most common offence type at the three **casinos** mentioned above, ahead of Thefts. Regarding all Violence offences, 58% of these were at (all) Casinos.

Of interest, there were six **Robbery of Business** offences, three of which involved the use of a **handgun** (possibly a replica). These all occurred **out of the City Centre at Bookmakers** in Radford and Bestwood. This makes up approximately **10% of all Business Robberies**. City-wide, Robbery of Business is one of the few offence types that is showing increases for 2012-13. From looking at the details of the **Violence, Criminal Damage and Public Order** offences there does appear, perhaps unsurprisingly, to be a certain level of frustration at 'losing' whilst in the premises that has then motivated the crime. **Bookmakers** had the largest volume of crimes, with the majority of these being **Criminal Damage** offences. For all of the above crimes, 74% remain undetected.

Within the same 12 month period there were a total of 190 **ASB** incidents where the incident address was listed as one of the premises provided by the police. This accounts for approximately less than 1% of all ASB within this time. Of the ASB types, this is somewhat affected by the **change in the ASB recording** in November 2011, however the overwhelming majority was **Nuisance behaviour** (116 in the new type, or 61 as 'Rowdy/'Nuisance'). For the ASB incidents, 45% fell within the four City Centre beats.

In regards to **Repeat Locations**, Gala Casino had the most with 18, and the next highest was Alea Casino with 13. Belfred Radford Road and Coral Bookmakers both recorded 12 incidents and all four of these premises also featured in the repeat locations for the Crime analysis. The other ASB repeat location in the top 5 was Ladbrokes. These five locations accounted for 35% of all the ASB incidents involving gambling premises.

Regarding the top 2 ASB locations; Alea and Gala Casino, over 75% of these offences occurred from **midnight until 6am**. These are both 24 hour premises. The top Crime repeat location as previously stated was the Nottingham Racecourse where **Theft** offences were prominent. This does not appear to be a problematic location in regards to ASB. This is due to the majority of the ASB offenders being in a betting shop when police called as they have previously been barred. The other main problem is that the customers have become **abusive when they have lost** – including not leaving. There are also occasions when individuals have been drunk and or asleep in the premises, including some who are described in the incidents as being homeless. Fights and 'scuffles' are less common – perhaps as any incident of note would have been involved in the crime figures.

Intelligence suggests that substance misuse and gambling is linked, as either addicts of both drugs/alcohol and gambling, or drug dealing to fund a gambling habit. The intelligence picture is based on few individual cases but highlights the potential to further understand and manage this association. Contact has been made with APAS (an alcohol and gambling addicts support service), but no data has been received to quantify the level of need around this. With regards to more organised criminality, such as money laundering and sexual exploitation, there is an intelligence gap surrounding the link with these types of crimes and gambling premises, but again is an argument for this to be considered in the policy given the potential harm it would cause.

In conclusion, there is a link between licensed gambling premises and crime, with particular distinction between casino's, which attracts more serious crime (violence) and bookmakers/racecourse, which attracts higher volume, lower level crime (theft). It is worth noting the prevalence of business robberies at bookmakers, including a number involving a firearm, which account for approximately 10% of all business robberies in the time frame analysed.

Although crimes in and around these premises, overall, is a small proportion of all crime, there is a potential risk of harm from both pre planned crime (i.e. robbery) and the emotive, unpredictable response undeniably linked to gambling. The concern in Nottingham around increasing licensed gambling premises relates to unpredictable increases in crime and disorder and the protection of the public.

The Partnership would like the policy to reflect the requirement for gambling premises to ensure there is a robust process in place to prevent crime and ASB in and around the premise, in accordance with section 17 of the Crime and Disorder Act. Further to this, the Partnership would like the policy to include mechanisms to ensure that once a premise has been approved that there is an ongoing review process to evaluate the effect this is having on crime and ASB and a responsibility on the premises to ensure they are up to date with best practice and regularly review the effectiveness of their processes.

Table 1: Crime in different types of gambling premises

Violence	Amusements	Bingo	Bookmakers	Casino	Raptrack
ABH			1	3	
ASSAULT WITH INJURY			1	2	
ASSAULT WITH INTENT TO CAUSE SERIOUS HARM			1		
COMMON ASSAULT		1	4	6	
Public Order					
AFFRAY (SEC 3 POA) AND BOMB HOAX			1		
FEAR/PROVOCATION VIOLENCE (SEC 4 POA)			2	1	
HARASSMENT/ALARM/DISTRESS (SEC 5 POA)	1		2		
VIOLENT DISORDER (SEC 2 POA)			1		
Burglary					
BURGLARY OTHER	1		6		
BURGLARY OTHER ATTEMPTED	1			1	
Criminal Damage					
CRIMINAL DAMAGE OTHER	2		8	3	
CRIMINAL DAMAGE TO A BUILDING OTHER THAN DWELLING			7	1	
CRIMINAL DAMAGE TO A VEHICLE		1	1		
Robbery					
ROBBERY OF BUSINESS PROPERTY			6		
ROBBERY OF PERSONAL PROPERTY		1	1		
Theft					
THEFT BY EMPLOYEE				1	
THEFT FROM PERSON			1		5
THEFT OTHER	1	3	8	7	4
THEFT OR UNAUTHORISED TAKING OF PEDAL CYCLE	1	1	1		
THEFT FROM SHOP	2				
Autocrime					
THEFT OR UNAUTHORISED TAKING OF VEHICLE				1	
THEFT FROM VEHICLE	1	1	1		4
Other					
DOMESTIC INCIDENT		3	1		
POSSESSION OF CONTROLLED DRUGS			2	1	
FORGERY OTHER ETC				1	
Total	10	11	56	28	13

5.8

In response to 'The Gambling Commission will play a lead role in preventing gambling from being a source of crime...'

It has been identified that gambling premises are linked to crime. An expansion on how the Gambling Commission will prevent gambling from being a source of crime would be of interest to the Partnership.

5.9

In response to 'The Authority will not generally be concerned with the suitability of an applicant...'

The Partnership would be interested to receive information on which organisation will be responsible for considering the suitability of applicants.

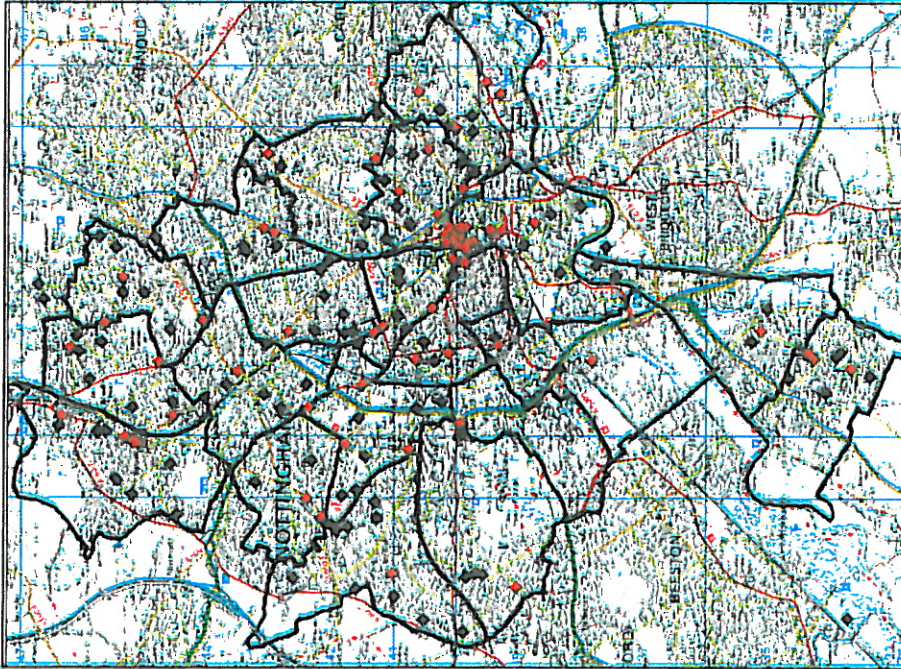
5.25

In response to '...the Authority will look particularly closely at applications that are made for premises close to sensitive areas'

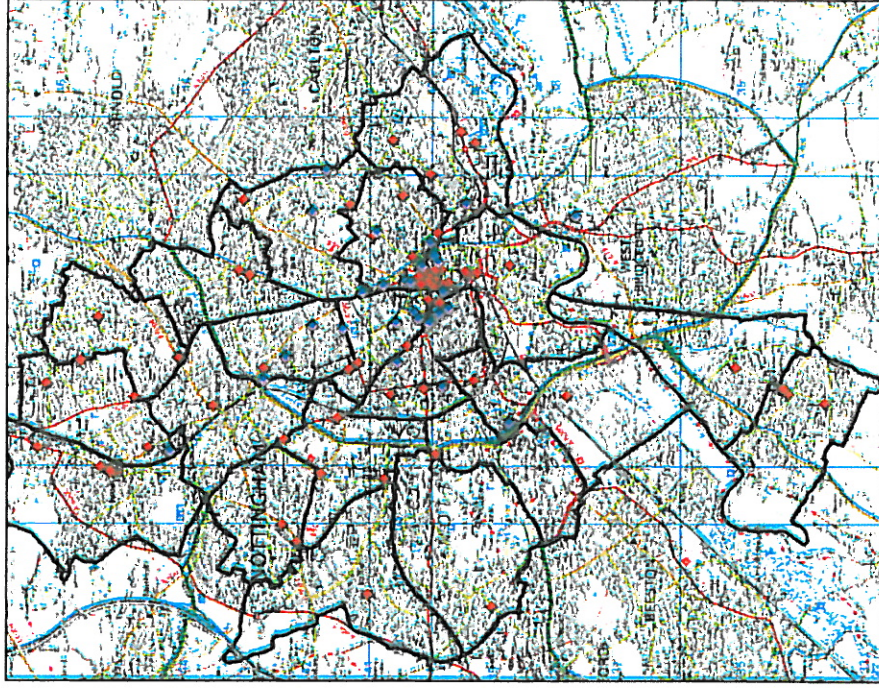
The below maps show the locations of gambling premises and schools, and gambling premises and drug treatment agencies within Nottingham city. What will the authority put in place to monitor and measure any negative impact on sensitive/vulnerable locations once an application for premises has been approved?

***Figure 1: Map showing locations of gambling premises and schools :
NB* Gambling premises are displayed as red squares on both maps***

Gambling premises and Schools



Gambling premises and drug treatment agencies



<p>8.25</p>	<p><i>In response to '...the Authority will not consider imposing conditions.....which specify that membership of a club or other body is required'</i></p> <p>The Partnership argue that having gambling premises demonstrate an awareness of crime types in the area and crime types that are linked to their establishment would assist in the management of those crimes.</p> <p>It is suggested that premises should monitor and review best practice in relation to the management and monitoring of crimes and that this is imposed through the policy. For instance the Metropolitan Police's 'Safe Bet Alliance' addressed the problem of robbery targeting bookmakers, the acknowledgement and sharing of best practice would undoubtedly have a positive impact on crime in this area.</p> <p>9.10</p> <p><i>In response to '...Applicants are encouraged to offer their own measures to meet the licensing objectives.... The list is not mandatory....'</i></p> <p>The partnership is requesting further information with regards to why the measures are not mandatory. Further to this, how will the individual measures, that premises choose to put in place, be assessed for their effectiveness and appropriateness?</p> <p>15.4</p> <p><i>In response to Policy Three:</i></p> <p>The Partnership would like the risk based assessment approach to take account of high impact areas. It is suggested that areas which have high crime and disorder levels are prioritised with more frequent assessments and visits to ensure premises are complying with legislative requirements.</p> <p>Additional</p> <p>Will there be any reflection in the policy with regards to anti-money laundering, anti-sexual exploitation and anti- drug dealing/using measures?</p>
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Please return to:
The Licensing Officer, Nottingham City Council, Licensing, Derwent Building, Eastcroft Depot, London Road, Nottingham, NG2 3AH