

No comments were made to sections: 4,6,7,10,11,12,13,14,16,17, Appendix 1 and 2. Those in blue below are commented against

Preface

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Map of the City and Wider Conurbation

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- 12 Exchange of and Access to Information
- 13 Fees
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- 15 Inspection and Enforcement**
- 16 Monitoring and Review of this Statement

Appendix 1 Persons Consulted

Appendix 2 'No Casino' resolution with supporting reasons

Section 5 – Statement of Principals

Ref No.	Policy/Paragraph /Question No.	Summary of Respondents Comments	Authority's Appraisal of Comments	Authority's Response with regard to Statement of Policy
3	5.22	<i>"Not accurate to state that harm in the context of applications is not limited to gambling related harm but includes wider adult and child safeguarding considerations. S1c of the Act makes clear that the licensing objective in question is "to protect children and other vulnerable people from being harmed or exploited by gambling." It would be wrong to expect policies to extend beyond that context. We strongly recommend that the wording is amended as it clearly conflicts with the legislation."</i>	The policies and procedures that applicants have in place should support the licensing objective to protect children and other vulnerable people from being harmed or exploited by gambling. There is no provision in the Act to go to any further extent.	Deleted sentence stating <i>"Harm in this context is not limited to gambling related harm but includes wider child and adult safeguarding considerations"</i> .
3	5.22 7 th Bullet Point	<i>"There are clear guidelines imposed on operators about free bets and</i>	Acceptable comment and the Gambling Policy amended to that affect.	Deleted bullet point 7 to reflect the comments made by Novomatik UK.

		<i>bonuses which the Gambling Commission views as acceptable subject to those parameters”</i>		
3	5.31 – last two bullet points and penultimate	<p><i>“Demand is not relevant to an application and cannot be considered when assessing an application. We suggest a statement to that effect is included.”</i></p> <p><i>“note that Bingo premises can be licensed for alcohol.”</i></p>	Acceptable comments and the Gambling Policy amended to that affect.	Amended paragraph 5.31 and deleted the final two bullet points to reflect the comments made by Novomatik UK.
4	5.21 – 5.22	<i>“The policy briefly mentions protecting children and vulnerable people (5.21 and 5.22) but lacks specific support measures or partnerships with relevant organisations which can help respond to and support these groups.”</i>	No amendment to the Gambling Policy is required here in respect of this comment as it is a statement to explain ‘vulnerable people’ and it would not be the Licensing Authorities responsibility to put in place support measures or reference particular organisations to help support this group of people. The link to the city councils overall gambling strategy is included in the policy to reflect this and where support services can be located within the introduction of the policy.	No change required
4	5.9	<p><i>“The policy mentions the potential development of a Local Area Profile (LAP) in the future but does not provide detailed guidance or an existing profile. LAP can help tailor policies and measures to specific community needs.</i></p> <p><i>Westminster City Council provides a detailed and comprehensive LAP which accompanies their public</i></p>	At present, no plans for a Local Area Profile with the lack of sufficient evidence to support one. Further work is being continued with public health and other partners to evaluate how we have access to evidence to support a future LAP when our policy is next reviewed The number of premises licence’s issued under the Gambling Act in Nottingham City and surrounding areas is 51.	No change required

		<i>gambling policy which can be found here - Local Area Profile for gambling risk Westminster City Council.</i>		
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Section 1 – Preface

Ref No.	Policy/Paragraph /Question No.	Summary of Respondents Comments	Authority’s Appraisal of Comments	Authority’s Response with regard to Statement of Policy
2	Promotion of three licensing objectives	The statement should be reconsidered and redrafted to remove the statement of the promotion of the licensing objectives as this “central” to Licensing Act 2003 application and not Gambling Act 2005 applications.	Acceptable comments and the Gambling Policy amended to that affect.	Amended paragraph 2 to reflect the comments made by Gosschalks Solicitors on Behalf of Betting Gaming Council (BGC). The word reference has replaced the word regard.

8c Representations

Ref No.	Policy/Paragraph /Question No.	Summary of Respondents Comments	Authority’s Appraisal of Comments	Authority’s Response with regard to Statement of Policy
3	8.12	<i>“The statement should be reconsidered and redrafted to remove the statement of the promotion of the licensing objectives as this “central” to Licensing Act 2003 application and not Gambling Act 2005 applications.”</i>	Any objection made must be based upon one of the Gambling objectives and these are set out at the start of the policy.	No change required.

9d Bingo

Ref No.	Policy/Paragraph /Question No.	Summary of Respondents Comments	Authority's Appraisal of Comments	Authority's Response with regard to Statement of Policy
3	9.22	<i>"We note that bingo premises can have an alcohol licence and that they also are entitled to the same machines as AGCs. We suggest that is referenced."</i>	Acceptable comments and the Gambling Policy amended to that affect.	Amended paragraph 9.22 to reflect the comments made by Novomatik UK.

Section 15 Inspection and Enforcement

Ref No.	Policy/Paragraph /Question No.	Summary of Respondents Comments	Authority's Appraisal of Comments	Authority's Response with regard to Statement of Policy
4	Not specifically referred to but may relate to 15.5-15.7	<p><u><i>Compliance auditing outcomes.</i></u></p> <p><i>"While the policy details the role of maintaining and auditing compliance with the Act and where necessary to take enforcement action should the Act be breached, little detail is provided as to what enforcement activity could follow.</i></p> <p><i>The risk-based approach in auditing compliance is grounded in strong rational but it is key to ensure this is followed with clear procedures as to how non-compliance is dealt with and responded to."</i></p>	<p>The enforcement activity to follow would depend on the offence taken. Our Licensing Enforcement Officers carry out routine inspections to check conditions adhered to, notices displayed and anything not as it should be, would be highlighted to the operator with a further visit to check that any issues have been rectified.</p> <p>Test purchasing is carried out by operators themselves and the information shared with both the Licensing Authority & Gambling Commission of outcomes from these tests.</p>	No change required.

Section 3 Consultation on the Policy

Ref No.	Policy/Paragraph /Question No.	Summary of Respondents Comments	Authority's Appraisal of Comments	Authority's Response with regard to Statement of Policy
4	3.3	<p>The policy acknowledges the importance of involving the public however there is little detail as to the role of public awareness campaigns. Can play in reducing and preventing harm associated gambling.</p> <p>Awareness campaigns can target vulnerable populations.</p> <p><i>“This could include collaborating with schools to integrate gambling awareness into the curriculum, ensuring young people understand the risks from an early age. Public awareness campaigns using various media platforms—such as social media, local newspapers, and public transport advertisements—can reach a broad audience.”</i></p>	<p>It is not the role of the Licensing Authority to engage with these groups, The link to the city councils overall gambling strategy is included in the policy, The required information can be located within the document.</p>	<p>No change required.</p>

Miscellaneous Comments

Ref No.	Policy/Paragraph /Question No.	Summary of Respondents Comments	Authority's Appraisal of Comments	Authority's Response with regard to Statement of Policy
1	No particular reference – referring to “Public Health” Approach	For the Authority to commit in its statement of principles to a public health approach.	Public Health have been consulted with throughout the process of renewing the Gambling Policy, but Public Health are currently not a responsible authority under the Gambling Act 2005. If this changes in the future our Gambling Policy will be amended to reflect this.	No change required.
3	None Specified context may be applied to sections 1,2 or 4 Regulators Code	That the policy does not refer to the Regulators Code which the GA 05 Act is subject to.	This is referred to in paragraph 15.4 of the Statement of Gambling Policy.	No change required.
4	None Specified – may be applied to Appendix 1, section 3, 6 or 7	<p>Engagement and consultation activity – should detail how the policy has been informed by partner organisations.</p> <p>Regular Engagement Process to be reflective of all and local landscape.</p> <p>Detailed engagement prospects to be built into the policy with identified vulnerable groups to reflect risks and the needs of these groups.</p>	<p>There has been a full consultation process, the consultation responses will be referred to Full Council.</p> <p>As already detailed The link to the city councils overall gambling strategy is included in the policy to reflect this and where support services can be located within the introduction of the policy.</p> <p>There is an ongoing Gambling related harm core group in existence, and this is chaired by Public Health. The Licensing Authority remain a key contributor to the group.</p>	No change required.