

Andrea Furness

From: Brian Minihane <bminihane@williamhill.co.uk>
Sent: 19 September 2018 14:28
To: Ext Mail: Licensing
Subject: Draft Statement of Gambling Principles - consultation response
Attachments: Response to gambling-draft-statement-of-principles.docx

Good afternoon,

Please find attached our response to the above consultation, where we just wish to respond on the one point shown. If you have any further questions in relation to this, please don't hesitate to get in touch.

Kind regards

Brian



Brian Minihane

National Licensing & Development Manager

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Teignbridge District Council - Consultation response document re Review of Statement of Principles		
Name	Brian Minihane	Ref Number: for official use only
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Paragraph No	Please photocopy if more sheets are needed	
6 Betting Premises 6.1 Betting machines	Comments	<p><i>This licensing authority will require a full premises licence variation application where a substantial or significant variation to the premises occurs, this includes the sighting or placement of privacy screens and/or booths of any kind around any machines.</i></p> <p>Although in agreement with the first part of this paragraph, we would not agree that a full premises licence variation is required for the placement of privacy screens around gaming machines. When we install such a set-up, we would, as a responsible operator, take into consideration the suitable positioning of the machine within the premises, and the ability of staff to be able to monitor the machines fully, and we would also document this in the Local Area Risk Assessment. The licence conditions and code of practice (LCCP) state: 'Facilities for gambling must be offered in a manner which provides for appropriate supervision of those facilities by staff at all times'. As a result, this subject is already covered by the LCCP, and it is clear that we must ensure that all facilities can be supervised adequately, including any gaming machine that may be situated within a privacy booth. The LCCP guidance gives you the protection that operators are required to ensure adequate supervision, and of course, we would also be more than happy to discuss any concerns you may have with our approach in any individual shop, given that all shops are of various sizes and layouts. We would be willing to consider further appropriate measures to alleviate these concerns if the situation arose.</p> <p>There cannot therefore be the need for a full licence variation, and it is certainly not necessary so long as operators aim to act responsibly (with the guidelines already set in the LCCP), and are content to act further where there are any concerns. If there is any concern, it can be discussed without any application having to be made, which will ensure a quicker resolution.</p> <p>We would therefore request for the reference to privacy screens to be removed from this section.</p>
	Comments	