

## Appendix C

### Summary of main changes from Gambling Statement of Principles 2013-2016, including proposed changes following public consultation

Part A	Brief Description
11.4	Additional bullet point that intelligence or complaints received will be taken into consideration and used as part of a risk-based inspection programme.
11.6	New paragraph making reference to the LLEP Local Authority Assessment Templates which will be used when conducting inspections. This gives greater consistency with other authorities.
14	New section 'General Principles where Gaming Machines are provided.' This section is there to give information on our expectations in relation to gaming machines, particularly in relation to their location within a premises to allow good supervision of customers.
14.2 (following consultation)	Addition to bullet points at 14.2 to clarify when a variation application would be required for re-location of gaming machines following response from William Hill.
15	New section 'Children and Vulnerable Persons' to highlight the need for gambling operators to have robust policies in place to help identify and protect children and vulnerable persons from gambling related harm and exploitation.
15.6 (following consultation)	Additional clarification to make paragraph more balanced following response from Association of British Bookmakers (ABB).
Part B	
1.4.3	Three new bullet points to clarify our expectations in respect of separation of premises.
1.6.1	Expansion on our expectations that any issues relating to the location of a gambling premises will be included in the local risk assessment.
1.6.2	New paragraph to inform operators that those premises located in sensitive areas may have restrictions imposed on the advertising of their gambling facilities if necessary.
1.13	Expansion of information on our expectations of local risk assessments, including keeping them updated. Also reference to expectation that where a premises consists of an Adult Gaming Centre (AGC) and an unlicensed Family Entertainment Centre (uFEC) we would expect a risk assessment for the whole premises. Update to the list of factors for operators to consider when completing their risk assessments.

1.9.1 (following consultation)	New paragraph to clarify when it would be appropriate to include supplementary conditions on a premises licence following response from the ABB.
2.3 and 2.4	Clarification that there should not be direct access from an AGC to any other licensed gambling premises or permitted area and that we would expect a scale plan with AGC applications.
3.5 and 3.6	Our expectation that we would expect robust safeguarding policies at Family Entertainment Centre (FEC) premises and that all applications must have a scale plan.
4	Confirmation that our authority is not enabled to grant any casino licences.
6.2	Clarification that all applications for betting premises licences must have a scale plan and that a licence variation would be required if there was the intention to include privacy screens or pods around the gaming machines.
7.4.3	Additional information on entitlements in relation to gaming machines afforded to tracks that also hold alcohol licences.
<b>Part C</b>	
1.3	Further emphasis that uFEC permitted premises must be used wholly or mainly for making gaming machines available for use, with examples given.
1.9.1	Additional supporting documents requested to be submitted with uFEC permit applications, particularly in relation to Disclosure and Barring Service (DBS) checks.
1.10.2 and 1.10.3	Specific reference to requirement that policies and procedures at uFEC premises also include considerations around safeguarding and child sexual exploitation (CSE), including the designation of a 'safeguarding co-ordinator' where possible.
2.2 and 2.4	Additional paragraph requesting that plans are included with applications to notify the licensing authority that gaming machines are to be provided in alcohol licensed premises. Requests for permits for three or more machines may be referred to the Licensing Sub-Committee if felt appropriate.
3.4.1 and 3.5.1	Updated information on DBS applications and our expectations of premises with prize gaming permits to have policies relating to safeguarding and CSE, including the designation of a 'safeguarding co-ordinator'.
4.8	New paragraph to give examples of the information we would consider when determining whether a club was 'bona fide' and could therefore be granted a club machine or gaming permit.
5.2	Update to the restrictions relating to temporary use notices (TUNs).

8.3.2 and 8.3.3	Additional information on requirements for small society lotteries.
<b>Appendix A</b>	Update to responsible authorities' contact details.
<b>Appendix C</b>	New appendix relating to safeguarding children and vulnerable persons and our expectations.

*Please note: minor alterations (i.e. dates/grammar etc.) and replication of insignificant Gambling Commission Guidance changes made to the draft document Policy are not included in this list.*