To: Members of the Licensing Committee

Councillors:

Chair – P Nelson
Deputy Chair – B Maher
B Axcell, M Biggin, H Cooksey, L Dirir, M Creaghan, J Davidson, C Mitchell, J Kerr-Brown, T McCarthy, L Morgan and G Welborn

6 November 2018

Licensing Committee

Date: Wednesday 14 November 2018
Time: 18:30
Venue: Committee Room 1, Town Hall, Sankey Street, Warrington, WA1 1UH

Agenda prepared by Adam Kellock, Democratic Services Officer, Telephone: (01925) 442144
E-mail: akellock@warrington.gov.uk

AGENDA

Part 1
Items during the consideration of which the meeting is expected to be open to members of the public (including the press) subject to any statutory right of exclusion.

Item

1. Apologies for Absence

To record any apologies received.

2. Code of Conduct - Declarations of Interest
Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

Members are reminded of their responsibility to declare any disclosable pecuniary or non-pecuniary interest which they have in any item of business on the agenda no later than when the item is reached.
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To confirm the Minutes of the meeting of 11 September 2018 as a correct record.

Report of Director of Public Health, Housing, Neighbourhoods and Public Protection.

**Part 2**

Items of a "confidential or other special nature" during which it is likely that the meeting will not be open to the public and press as there would be a disclosure of exempt information as defined in Section 100I of the Local Government Act 1972.

- Information relating to an individual

- Information relating to an individual
LICENSING COMMITTEE
11 September 2018


L 8 Apologies

Apologies for absence were received from Councillors L Dirir and J Kerr-Brown.

L 9 Code of Conduct – Declarations of Interest

There were no declarations of interest received.

L 10 Licensing Committee Minutes

Decision,

That the minutes of the Licensing Committee meeting held on 12 June 2018 be approved and signed as a correct record.

L 11 Taxi Sub Committee Minutes

Decision,

That the minutes of the Taxi Sub Committee meetings held on 4 June 2018 and 20 July 2018 be approved and signed as correct records.

L 12 Neighbourhood Weekender Review – August 2018

A review of the Neighbourhood Weekender Event which took place on Victoria Park over the weekend of 26th & 27th May 2018 was presented by the Chief Executive.

The event was organised SJM Events attracting 25,000 people over the two days and was seen as having been a great success with it generating £2.5m in additional income and helping with the profile of cultural events within the town.

The review presented the challenges and issues experienced during the event with evidence from the event organiser, police, Council member and the public to inform the findings. Members of the public were invited to an evaluation meeting following the event which focused on areas for improvement going forward.

Outlines of issues that had been received by the Warrington Borough Council Contact Centre and local Councillor enquiries along with a log of the enquiries received by the event organiser was provided at appendices A & B of the report respectively.

Issues outlined included public urination with the location and number of toilets provided to be reviewed to ensure that they are in the right place. Additionally
transportation issues were raised with the location of the taxi rank to be considered. It was also noted that the event took place on the day of a rail strike which posed additional strains on transportation.

In terms of police issues it was reported that the police had spoken to 32 people with regards to carrying drugs and one arrest was made for the supply of drugs. Considering the type of event and the numbers attending this was considered to be a low amount.

The event would again be planned for next year under the licensing arrangements with 18 recommendations set out within appendix E of the report aiming to improve the experience going forward.

It was acknowledged that the favourable weather had an impact on the event with wet weather having the potential to cause other issues despite the improvements works carried out on the drainage of Victoria Park.

The main areas for improvement focused around how people left the venue at the end of the festival.

Members thanked the officers involved for their work and praised the success of the event and encouraged the recommendations to be carried out prior to any future event.

L 13 Exclusion of the Public (Including the Press)

Resolved,

That, members of the public (including the Press) be excluded from the meeting by reason of exempt information considered in the course of the following item of business being within Category 1 of Schedule 12A to the Local Government Act 1972.

L 14 Application for exemption from the policy requirement to have CCTV Systems installed in relation to Additionally Conditioned Private Hire Vehicles

The committee received a report which outlined the request of the license holder of an additionally licensed vehicle to be exempt from the requirement to operate CCTV within their vehicle.

Members were informed that the Council has a CCTV policy for licensed vehicles in place which requires all vehicles to be fitted with CCTV recording equipment. Footage was stored securely and could only be accessed once certain requirements had been fulfilled.

Whilst the CCTV policy was in place the committee was informed that they were able to depart from the policy in circumstances where it was necessary and doing so would not cause a danger to the travelling public.
An application had been received to allow an exemption from the CCTV requirement for the holders existing vehicle and new vehicle that had been purchased.

A business plan had been submitted which outlined the nature of the business which was an executive chauffeuring company. Clients for this business were often VIP’s with discretion and privacy being highly valued.

It was stressed by the license holder that having not being required to have a CCTV system in place would allow them to compete fairly with other similar businesses who also have an exemption from the policy.

It was confirmed that there were currently 9 additional licensed vehicles who had received an exemption from the CCTV requirement.

Members of the committee retired to consider their decision.

Decision:

That the committee grants the request on the basis that the operator will maintain his/her business model of providing prestigious executive door-to-door chauffer driven service to their customers.

Signed ......................................

Dated...........................................
WARRINGTON BOROUGH COUNCIL
LICENSING COMMITTEE
DATE OF COMMITTEE – 14th November, 2018

TITLE OF REPORT: GAMBLING POLICY STATEMENT 2019-2022

1. PURPOSE

1.1 The Licensing Authority is required to review its statement of Gambling Policy every three years and to publish a revised statement for the period 2019 to 2022.

1.2 The purpose of the report is to:-

1.2.1 Seek Members approval of the draft Gambling Policy for 2019-2022
1.2.2 To obtain approval to consult on the revised Policy

2. INTRODUCTION AND BACKGROUND

2.1 The Gambling Act received royal assent in April 2005 and into force on 1 September 2007. It consolidates the regulation of casinos, bingo, gaming machines, lotteries, betting and remote gambling in one act.

2.2 The Act established the Gambling Commission, which has responsibility for advising on issues on gambling and for the issuing some licences as prescribed by the act.

2.3 The Council also has responsibilities, under the act, for the issuing of premise licences, permits, and temporary use notices and for the registration of small society lotteries.

2.4 The act also requires Licensing Authorities to prepare and publish a Gambling Policy, which should set out how it intends to exercise its functions. The policy needs to be refreshed every three years.

2.5 The current policy therefore needs to be revised for the period 2019-2022.
POLICY REFRESH 2019-2022

3.1 The Gambling Commission provides guidance to local authorities on the content of their policy statements. The latest guidance was published by the Gambling Commission in September 2015 and updated September 2016. The Gambling Commission encourages licensing authorities to set out in their policy statements the local risks that licensees or new applicants should consider so that they can assess the local risks to the licensing objectives posed by the gambling facilities that are being offered at their premises. This is in line with the Gambling Commission’s Licence Conditions and Codes of Practice (updated October 2018) which requires operators of premises licences to consider local risks.

3.2 The 2016-19 policy followed the recommended template by the Gambling Commission. The majority of the content from the existing 2016/19 policy remains the same. However, there have been some changes which are summarised at appendix 1 summary of changes. The authority, where possible, has included statements in the local policy with regard to gambling harm, particularly due to scams, the increased prominence of online gambling and the need to safeguard the most vulnerable within our society.

3.3 Provision is made within Section 166 of the Gambling Act 2005 for Licensing Authorities to issue a 'no casino' resolution. In considering whether to pass a no casino resolution the Gambling Commission has commented that an authority should provide clear details of how the decision has been made and on what basis; including the evidence considered. Any resolution lapses every three years as part of the review of the statement.

3.4 The Council has previously resolved not to formally pass a 'no casino' resolution, as there is an insufficient evidence base from which to do so, and if an application should be received, it can still be determined on its relative merits. It is proposed to maintain the Council's current position and to formally put the matter before Members following the consultation exercise. The adoption of the final policy is a matter for Full Council.

3.5 The draft Statement is set out in appendix 2 together with appendices within the body of the document. The associated area profile is set out at appendix 3.

4 FINANCIAL CONSIDERATIONS

4.1 Publication and consultation on the draft Statement of Gambling Policy will be conducted within existing resources.

5 RISK ASSESSMENT

5.1 The Statement of Gambling Policy sets out how the Council intends to discharge its responsibilities under the act.
5.2 The substance of the policy remains broadly the same and the gambling character of the town, in terms of the Act, is settled. There is a hierarchy of functions pursuant to the Act with the policy considered to be the least significant having regard to the statute, the objectives and supporting guidance. The authority will continue to have regard to the existing policy and the draft, whilst the updated policy is updated.

6 EQUALITY IMPACT ASSESSMENT

6.1 The Council has a legal duty to proactively promote race, gender and disability equality and to tackle discrimination experienced by vulnerable groups. It is the role of the Licensing Authority to administer the licensing regime in accordance with the law and each application will be considered on its merits.

7 CONCLUSION

7.1 The Statement of Gambling Policy must be refreshed every three years. The statement provides the policy base for decisions. No significant amendments to the existing policy are proposed. The Licensing Authority is required to consult on its draft statement.

8 RECOMMENDATION

8.1 It is recommended that:

- Members approve the draft policy for consultation.

BACKGROUND PAPERS

None
Appendix 1

Gambling Act Statement of Gambling Policy

Summary of Changes

The Gambling Act 2005 Statement of Licensing Policy is under its three yearly review. A number of changes have been made to reflect the research commissioned by the Council into problem gambling and the Area Profile.

Details of changes

Executive Summary No changes

Part A

Page 5 – Paragraphs 1.7 and 1.9

1.7 As a Strategic Partnership, we are concerned about the increased prominence of gambling on the high street, TV, internet, and the increase in problem gambling. The Authority therefore recognises the impact that this can have on the health and wellbeing of the individual and their families, and the harm to vulnerable groups. This is a whole borough issue which impacts on a range of other issues including homelessness, complex families, financial inclusion and associated addictions.

Paragraph within 1.9 - additional bullet point

By offering training to frontline staff on effects of gambling to appreciate the impacts of gambling on social, health and relationships wellbeing, and recognise gambling and/or other addictions within debt conversations and assessments

Paragraph within 1.9 - update to FOBT’s

In May 2018 the Government had confirmed that the maximum stake on Fixed Odds Betting Terminals would be reducing to £2.00. While recent events have led to this implementation being delayed, the Authority will continue to support and lobby for changes in addition to planning laws, which protects our local high streets from inappropriate clustering of gambling Ensuring that our family gaming centres protect children from harm.
Gambling Prevalence and Problem Gambling Update

11.1 The Gambling Commission regularly collects gambling data through telephone and online surveys and problem gambling data from the Health Survey for England. The most recent survey results (2017) show that within the previous four weeks 44.8% of respondents (aged 16 and over) had participated in at least one form of gambling, approximately 20.1 million adults. The proportion gambling within the previous four weeks was slightly higher for males (48.4%) when compared to females (41.4%). Over half (50.3%) of respondents aged 55 to 64 years had gambled in the previous four weeks, those aged 16 to 24 years had the lowest proportion gambling (35%). When excluding those only playing National Lottery draw products, 31.1% of adults had gambled in the previous four weeks, this was higher for males (33.7%) than females (28.5%). The age group with the highest proportion gambling in the previous four weeks was those aged 25 to 34 years (37.8%).

11.2 The most popular activity was the National Lottery draws with 27.3% of respondents stating that they had participated in this activity. The percentage observed for 2017 (27.3%) was significantly lower than the previous year (30%), this continues the downward trend in the participation of the National Lottery draws. Overall during 2017 there was a reduction in any gambling activity when compared to the 2016 (48.4%), however there were increases in the proportion of adults who responded that they had participated in any online betting (5.6% during 2017 compared to 5.4% in 2016) or online gambling (18.3% during 2017 compared to 17.3% in 2016).

11.3 Of those who had stated that they had gambled in person (e.g. placing a bet in a betting shop, visiting a casino or bingo hall, buying lottery tickets or scratch cards in a shop and so on) the most common activity was dog races (78%) followed by National Lottery draws (75.8%). Of those who participated in online gambling sports gambling was the most popular activity (72.5%) followed by ‘betting on other events’ (71.5%).

11.4 Over a third (33.2%) of respondents stated that they had gambled once per week with just over a fifth (20.7%) gambling on two or more occasions in one week. Of those who had placed bets (horse races, dog races, sports betting or betting on other events) during the previous four weeks, a fifth (20%) had betted on two or more days in one week whilst over a quarter (26.7%) had placed a bet once a week.

Problem Gambling

11.5 Problem gambling is defined as an overwhelming urge to gamble in spite of negative consequences and the disruption or damage to personal, family or recreational pursuits (NatCen, 2015).
11.6 Data collected by the Gambling Commission suggest that there are approximately 258,000 problem gamblers\(^1\) in England (0.6% of respondents to the survey). Males were more likely to be identified as a problem gambler (1%) when compared to females (0.1%). Those aged 25 to 34 years reported the highest prevalence of problem gambling (1.2%). These estimates are likely to be conservative as the surveys (as mentioned in 11.1) do not include certain population groups more likely to be more vulnerable to harm (e.g. students living in halls of residence, homeless people, armed forces personnel and those in prison) (Gambling Commission, 2018).

11.7 Harm can be caused by problem gambling, evidence suggests that an individual experiencing problem gambling are at greater risk of anxiety, stress, depression, and alcohol and substance misuse (Cowlishaw and Kessler, 2016). These factors do not only affect the individual, but are likely to have a wider impact on family and friends. This can include family breakdown, evidence suggests that there are higher rates of separation and divorce among problem gambler when compared to the general population (DCMS, 2007).

11.8 Gambling problems impact the more deprived communities the most, lower income households spend a larger proportion of their income on gambling (Williams, Rehm and Stevens, 2011), evidence has shown that there are more gambling machines are located in deprived communities (Wardle, Asbury and Thurstain-Goodwin, 2017) and increases in unemployment are associated with increased lottery sales (Wayland, 2012)

11.9 GamCare (a charity supporting problem gamblers) has reported that calls from problem gamblers and affected others increased during 2016/17 by 4% to 29,417 and that clients in treatment across Great Britain increased by 18% to 8,044. The main gambling activities disclosed by callers were machines in betting shops (19%), online betting (16%), online casino games (11%) and online slots (11%). The main gambling facilities (locations) disclosed were online (50%), followed by betting shops (35%) (GamCare, 2017)

11.10 The Authority is concerned about the prevalence of gambling within society and the increase in problem gambling. The Authority will work with the trade and strategic partners to promote the licensing objectives, with particular regard to the need to protect children and other vulnerable persons from being harmed, or exploited, by gambling. We recognise that this is a whole borough issue and we will work holistically together to provide support on addictions, to promote health and wellbeing, to protect the most vulnerable from falling victim to scams, to promote financial inclusion and to address the impacts on individuals, their families and on our communities.

11.11 The Authority's Investigations and Enforcement Team take a robust approach to the enforcement of fraudulent international lottery sweepstake and prize draw scams.
The Investigations and Enforcement Team works closely with the National Trading Standards Scams Team who notify The Authority of local victims who can then be supported by actively returning any monies stopped in transit to the fraudsters and support the victim through target-hardening advice and onward sign-posting to appropriate support services. This is further reinforced at presentation opportunities, through press releases, iCAN our Consumer Alert Network and social media. Further information in relation to the most common scams is available from the National Trading Standards webpage http://www.tradingstandardsecrime.org.uk/lottery-scams/

11.12 We recognise the role of responsible premises in promoting the licensing objectives by ensuring that they carry out risk assessments and adopt appropriate management systems.

**Page 17 – Paragraph 12.17 – Definition of vulnerable adult**

12.17 An ‘adult as risk’ previously referred to as a vulnerable adult is defined as an adult (a person over the age of 18) in its area (whether or not ordinary resident there) who:

a) has care and support needs regardless of whether or not the authority is meeting any of those needs and;

b) is experiencing, or is at risk of, abuse or neglect and;

C) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

**Page 19 – Paragraphs 12.28 – 12.30 How should Operators protect themselves? - updated**

12.28 Lottery and scratchcards are age-restricted products.

12.29 There are several checks and measures that operators can put into place to protect themselves from prosecution.

- Consider introducing an age verification policy such as Challenge 21/25 whereby anyone who appears to be under the age of 21/25 is asked to prove their age.
- If you are in doubt as to a customer’s age you should always ask for proof of age.
- You should request them to produce a reliable, acceptable form of proof of age such as a valid passport, a valid photo card driving licence, H.M. Forces Warrant Card or a Proof of Age Standards Scheme (PASS) ID Card. The PASS scheme is the UK’s national Proof of Age Standards Scheme and all cards meeting this standard bear an accredited hologram.
- Birth certificates and National Insurance cards should not be accepted as proof of age. They do not show a photograph of the person.
producing the document and National Insurance cards are issued before a person has reached their sixteenth birthday

- Keep a refusals register, written or electronic. This is a record of all the times that you refuse to sell an age-restricted product. Details kept in the register should contain a description of the person, their name and address (if you are able to obtain or know it), their approximate age, the date and time of the attempted purchase, the type of product that was requested and finally the reason for refusing the sale
- Display all age restriction notices prominently. You can get these from the Business Compliance Team (e-mail tradingstandards@warrington.gov.uk)
- Train all of your staff on the relevant legislation and hand out the written instructions on the checks that should be carried out.
- Keep a training record for each member of staff and keep it up to date. Ask staff to sign a copy of the instructions that they receive, to show that they have read and understood the contents. Ask them to sign and date the training record as well.
- Regularly check your systems and procedures to ensure staff are following them
- Keep up to date with changes in legislation that may affect your business

12.30 The Authority also operates a partnership approach to dealing with enforcement matters concerning licensed premises. This may include working with the Gambling Commission, Police Authority, or any of the other responsible authorities under the Gambling Act 2005, or working with colleagues from other Council departments or outside agencies.

Page 27 – See attached document Local Area profile - updated

1. Added context with the Gambling Commission findings on the current national picture.
2. Updated numerous data sources (Age profile – Mid 2016, Licences premises, Emerging adults, Problem gamblers [GA/Gamcare locations], Substance misuse [drug & alcohol treatments], Financial difficulties [Payday loan and foodbanks], Economic activity [Job Centre Plus offices and residents in receipt of Universal Credit], Homelessness and Community Centre locations.
3. Updated the weighted Rankings after the changes in the data and updated the tartan blanket with the new figures.
4. Updated maps with new ward boundaries and licences premises.
5. Updated maps with the new data sources (Emerging adults, Employment, Homelessness, Financial difficulties, Problem gamblers and Alcohol/Drugs).

Page 43 - Paragraph 26.6 - or more machines
26.6 It should be noted that the Authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for or can refuse the application. Before doing so, the Authority may consult with the Gambling Commission and Police and will invite submissions (either orally or in writing) from the Applicant. If after considering the submissions the Authority refuses the application or grants with a smaller number of machines and/or a different category of machines than that applied for the Authority will provide reasons. There is a right of appeal.
APPENDIX 2: POLICY

COVERED TO BE REFRESHED
STATEMENT OF PRINCIPLES 2019 - 2022
Gambling Act 2005
(Published Version)

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This Statement of Licensing Principles was approved by Warrington Borough Council on 

All references to the Guidance refer to the Gambling Commission's Guidance to Licensing Authorities, 5th Edition, published in 2015 (as amended)
Contact Details/ Advice and Guidance

Applicants can obtain further details about the gambling and application processes, including application forms, fees, and registers by contacting Warrington Borough Council at:- www.warrington.gov.uk

Or by Telephone on 01925 442119 by email to cexlicensing@warrington.gov.uk or by post to:-

Warrington Borough Council
Public Protection
Licensing Section
New Town House
Buttermarket Street
Warrington
WA1 2NH

The Authority would encourage an informal discussion before the application process in order to resolve potential problems.
Executive Summary


Under Section 349 of the Gambling Act 2005, Warrington Borough Council as a Licensing Authority (“The Authority”) is required to publish a statement of principles that it proposes to apply when exercising its functions under the Act. This Statement must be published at least every three years starting from 31 January 2007. The statement must also be reviewed from “time to time” in response to emerging risks.

The purpose of the statement of principles is to set out the principles that The Council propose to apply when determining licences, permits and registrations under the Gambling Act 2005. The Council is referring to its statement of principles as its’ Gambling Policy and will be referred to throughout this document as “the Policy”

Any decision taken by the Council in regard to determination of licences, permits and registrations should aim to permit the use of premises for gambling in so far as it is reasonably consistent with the licensing objectives which are:

- 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 conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

The principles to be applied specifically to the determination of premises licence applications include definition of premises, location, duplication with other regulatory regimes, promotion of the licensing objectives, conditions, door supervision, layout of the premises and supervision of gaming facilities. The policy also specifically mentions adult gaming centres, family entertainment centres, casinos, bingo premises, betting premises, tracks and travelling fairs.

The Council is responsible for issuing permits for prize gaming and unlicensed family entertainment centres. The Council is able to specify the information it requires as part of the application process which will aid determination and this information is described in this Policy.

Club Gaming and Club Machine Permits are also issued by the Council. The process for this is described, along with other processes specified in the legislation for example Temporary Use Notices, Occasional Use Notices and Small Society Lotteries.

Enforcement of the legislation is a requirement of the Act that is undertaken by the Council in conjunction with the Gambling Commission. The Policy describes the Council’s enforcement principles and the principles underpinning the right of review.

The Policy will not override the rights of any person to make an application and to have it considered on its individual merits.
The Policy has five appendices, showing the list of Responsible Authorities under the Gambling Act 2005, list of consultees, scheme of delegation, a summary of machine provisions by premises and gaming machine categories and entitlements.
PART A

1. The Licensing Objectives

1.1 In exercising its functions under the Gambling Act 2005, ("The Act") Warrington Borough Council must have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives are:-

- 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 conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

1.2 It should be noted that the Gambling Commission has stated: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".

1.3 Warrington Borough Council is aware that, as per Section 153 of The Act, in making decisions about Premises Licences and Temporary Use Notices it should aim to authorise the use of premises for gambling in so far as the permission 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 Policy

The Council’s Objectives

1.4 The Authority recognises the importance of gambling as a legitimate part of the leisure industry and will therefore not override the rights of any person to make an application and to have it considered on its relative merits.

1.5 The Authority shall ensure that premises have appropriate safeguards in place to protect children and the vulnerable from harm and will work with enforcement partners to realise this aim and to ensure that gambling does not become a source of crime and disorder within the local community.

1.6 The Authority will work with the trade to promote well run establishments and to ensure that gambling is conducted in a fair and open way.

1.7 As a Strategic Partnership, we are concerned about the increased prominence of gambling on the high street, TV, internet, and the increase in problem gambling. The Authority therefore recognises the impact that this can have on the health
and wellbeing of the individual and their families, and the harm to vulnerable
groups. This is a whole borough issue which impacts on a range of other issues
including homelessness, complex families, financial inclusion and associated
addictions.

1.8 The Authority will work with the Gambling Commission, trade and partners to
control the inappropriate clustering of shops and gambling outlets within the
Authority’s communities.

1.9 This can be achieved by:-

- Ensuring that applicants clearly set out how they will promote the licensing
  objectives.
- Carrying out research into the location of our licensed premises and the
  potential impacts on our community. This will form part of our local profile.
- (page 26)
- By increasing the strength of the public voice to increase local democracy
  and accountability.
- By ensuring that our own planning policies help us to shape our areas and
  to create places that we can all be proud of, where we protect the most
  vulnerable.
- By working with the trade to promote high standards of compliance.
- By working with enforcement partners to take firm, fair and robust action
  against those who chose not to comply.
- By signposting vulnerable gamblers and their families to appropriate care
  and support.
- By offering training to frontline staff on effects of gambling to appreciate the
  impacts of gambling on social, health and relationships wellbeing, and
  recognise gambling and/or other addictions within debt conversations and
  assessments.
- The Authority will continue to support and lobby for changes in addition to
  planning laws, which protects our local high streets from inappropriate
  clustering of gambling Ensuring that our family gaming centres protect
  children from harm.
- We will continue to monitor with interest and to support action to control the
  use of Fixed Odds Betting Terminals,
- By listening to and responding to the views of our communities, representatives
  of the trade, partners and support groups.

2. Introduction

2.1 Warrington Borough Council is situated in the heart of the Northwest, on both the
River Mersey and the Manchester Ship Canal and lies approximately halfway
between Manchester and Liverpool. Warrington is well served by public transport
and has strong transport links. The Council area has a population of 202,700
(Source: ONS Mid-Year Estimate 2011 the next census is due 2020) and it
covers an area of 70.19 square miles. The Council is a mixture of both urban and
rural with a densely populated central urban area. These areas are shown on the map below.

3 VISIONS AND VALUES

3.1 Warrington Borough Council’s vision for 2018-2020 has been set with its strategic partners. The Council’s vision is:

“We will work together with our residents, businesses and partners to create a place that works for all.”

3.2 Warrington has a nationally recognised reputation as being an economically dynamic and well connected destination. The vision for Warrington’s regeneration and growth seeks to enhance this reputation by strategic development opportunities that will deliver improved infrastructure, will bring forward investment opportunities, will deliver more jobs and homes, all within a sustainable environment. Warrington's ambitious vision is set out in the framework document “Warrington Means Business” that sets out not only the priority developments within the borough, but also how the town forms part of a regional economic development agenda; utilising concepts such as the Atlantic Gateway to integrate our growth with both Liverpool, Manchester and other parts of the North of England.
3.3 Warrington Borough Council has pledged to:

- grow a strong economy for all
- opportunities for the most vulnerable
- build strong, active and resilient communities
- create a place to be proud of.

3.4 Additionally, partners across Warrington are committed to promoting the long term wellbeing of the people who live and work in Warrington and recognise that factors contributing to wellbeing cover a broad range of areas ranging from physical and mental health, to economic prosperity, to feelings of safety and a pleasant living environment. This means everyone in the borough has a role to play in promoting wellbeing; wellbeing is everyone’s business.

3.5 The Warrington Health and Wellbeing Strategy sets a vision of:

“Working together for stronger neighbourhoods, healthier people, a vibrant and resilient economy and greater equality across all our communities.”

3.6 It highlights partners’ commitment to achieving long term wellbeing for residents of the borough.

3.7 The Council’s Policy has a strong role to play in supporting the delivery of The Council’s vision for Warrington.

4. Consultation on the Policy

4.1 The Council has consulted widely upon this statement before finalising and publishing it.

4.2 The Act requires that the following parties are consulted by licensing authorities:

- The Chief Officer of Police.
- One or more persons who appear to the Authority to represent the interests of persons carrying on gambling businesses in the Authority’s area.
- 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 Gambling Act 2005.

4.3 The Policy was approved at a meeting of the Full Council on *****March, 2019 and was published via our website on *****2019. Copies were available in the Town Hall, Sankey Street, Warrington, WA1 1UH.

4.4 Should you have any queries in relation to this Policy statement please send them by letter or email to the following contact:
It should be noted that this Policy will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Act.

5. Declaration

5.1 In producing this Policy, The Authority has had due regard to the licensing objectives of the Act, the Guidance to Licensing Authorities issued by the Gambling Commission, and any responses from those consulted on the statement.

6. Responsible Authorities

6.1 The Authority is required by regulations to state the principles to be applied in exercising powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the Authority, about the protection of children from harm.

The principles are:

- the need for the body to be responsible for an area covering the whole of the licensing Authority’s area; and
- the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group.

6.2 In accordance with the Gambling Commission’s Guidance to Licensing Authorities, this authority designates the Warrington Safeguarding Children Board for this purpose.

6.3 The contact details of all the Responsible Authorities under the Gambling Act 2005 are available via The Council’s website at: www.warrington.gov.uk and is attached at appendix 1
7. **Interested parties**

7.1 Interested parties can make representations about licence applications, or apply for a review of an existing licence.

7.2 The Act defines “interested person as follows: For the purposes of this part a person is an interested party in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the application is made, the person-

   a) lives sufficiently close to the premises to be likely to be affected by the authorised activities;
   b) has business interests that might be affected by the authorised activities; or
   c) represents persons who satisfy paragraph (a) or (b)

7.3 The Authority is required by regulations to state the principles it will apply in exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party.

7.4 Each case will be decided upon its own merits. This Authority will not apply a rigid rule to its decision making. It will consider the examples of considerations provided in the Gambling Commission’s Guidance to Licensing Authorities at 6.20 to 6.21. The Authority will also consider the Gambling Commission’s Guidance that “has business interests” should be given the widest possible interpretation and include partnerships, charities, faith groups and medical practices.

7.5 Interested parties can be persons who are democratically elected such as councillors and Members of Parliament. No specific evidence of being asked to represent an interested person will be required as long as the councillor/MP represents the ward likely to be affected. Likewise, parish councils likely to be affected will be considered to be interested parties. Other than these however, this authority will generally require written evidence that a person/body (e.g. an advocate/relative) ‘represents’ someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation is sufficient.

7.6 If individuals wish to approach councillors to ask them to represent their views then care should be taken that the councillors are not part of the Licensing Committee dealing with the licence application. If there are any doubts then please contact the Licensing Section, Public Protection, New Town House, Buttermarket Street, Warrington, WA1 2NH.

7.7 It is important to note that in order for a representation to be considered as relevant, interested parties are required to demonstrate that granting a licence would undermine any of the three licensing objectives under the Act (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 conducted in a
fair and open way and protecting children and other vulnerable persons from being harmed or exploited by gambling). For clarity, unlike the Licensing Act 2003, the Gambling Act 2005 does not include the prevention of public nuisance as a licensing objective.

8. **Exchange of Information**

8.1 The Authority is required to include in its Policy the principles to be applied by the Authority in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information between the Authority and the Gambling Commission, and the functions under section 350 of the Act with respect to the exchange of information between ourselves and the other persons listed in Schedule 6 to the Act.

8.2 The Authority will act in accordance with the provisions of the Gambling Act 2005, in its exchange of information. This may include this Authority providing information to or receiving information from the Gambling Commission in connection with its functions as a licensing authority. The Authority will also have due regard to any Guidance issued by the Gambling Commission on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005 and to the Data Protection Acts (1998 and 2018) from time to time and the General Data protection Regulation. Should any protocols be established as regards information exchange with other bodies then they will be made available.

8.3 Please contact the Licensing Section, Public Protection, New Town House, Buttermarket Street, Warrington, WA1 2NH for further information on our protocols.

9. **Enforcement**

9.1 The Authority is required to state the principles to be applied in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified:

9.2 The Authority will work closely with the Responsible Authorities in accordance with a locally established joint enforcement protocol and will aim to promote the licensing objectives by targeting known high risk premises following government guidance around better regulation.

9.3 The Authority shall in carrying out its enforcement duties with regards to the inspection of premises; and the powers to institute criminal proceedings in respect of certain offences under the Act, be guided by the Gambling Commission’s Guidance to Licensing Authorities and will be:

- 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 must be co-ordinated and implemented fairly.
- transparent: regulators should be open, and keep regulations simple and user friendly.
- targeted: regulation should be focused on the problem, and minimise side effects.

9.4 As per the Gambling Commission’s Guidance to Licensing Authorities the Authority will avoid duplication with other regulatory regimes so far as possible.

9.5 The Authority has adopted and implemented a risk-based inspection programme, based on:

- The licensing objectives
- Relevant codes of practice
- Guidance issued by the Gambling Commission, in particular at Part 6.36
- The principles set out in this Policy.

9.6 This may include test purchasing activities to measure the compliance of licensed operators with aspects of the Act. When undertaking test purchasing activities, this Authority will undertake to liaise with the Gambling Commission and the operator to determine what other, if any, test purchasing schemes may already be in place. Irrespective of the actions of an operator on their overall estate, test purchasing may be deemed to be an appropriate course of action.

9.7 The Authority’s main enforcement and compliance role will be to ensure compliance with the premises licences and other permissions authorised. The Gambling Commission is the enforcement body for the operating and personal licences. It is also worth noting that concerns about manufacture, supply or repair of gaming machines are not dealt with by the Authority but should be notified to the Gambling Commission.

9.8 The Authority will also keep informed of developments as regards the work of the Better Regulation Executive in its consideration of the regulatory functions of local authorities.

9.9 The Council has published a Regulatory Code and Enforcement Policy which sets out the approach to enforcement.

10. Licensing Authority functions

10.1 The Authority is required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences
- Issue Provisional Statements
• Regulate members’ clubs and miners’ welfare institutes who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
• Issue Club Machine Permits to Commercial Clubs
• Grant permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres
• Receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
• Issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines
• Register small society lotteries below prescribed thresholds
• Issue Prize Gaming Permits
• Receive and Endorse Temporary Use Notices
• Receive Occasional Use Notices
• Provide information to the Gambling Commission regarding details of licences issued (see section above on ‘information exchange’)
• Maintain registers of the permits and licences that are issued under these functions

10.2 It should be noted that The Authority is not involved in licensing remote gambling. This will fall to the Gambling Commission via operating licences.

11. Gambling Prevalence and Problem Gambling

11.1 The Gambling Commission regularly collects gambling data through telephone and online surveys and problem gambling data from the Health Survey for England. The most recent survey results (2017) show that within the previous four weeks 44.8% of respondents (aged 16 and over) had participated in at least one form of gambling, approximately 20.1 million adults. The proportion gambling within the previous four weeks was slightly higher for males (48.4%) when compared to females (41.4%). Over half (50.3%) of respondents aged 55 to 64 years had gambled in the previous four weeks, those aged 16 to 24 years had the lowest proportion gambling (35%). When excluding those only playing National Lottery draw products, 31.1% of adults had gambled in the previous four weeks, this was higher for males (33.7%) than females (28.5%). The age group with the highest proportion gambling in the previous four weeks was those aged 25 to 34 years (37.8%).

11.2 The most popular activity was the National Lottery draws with 27.3% of respondents stating that they had participated in this activity. The percentage observed for 2017 (27.3%) was significantly lower than the previous year (30%), this continues the downward trend in the participation of the National Lottery draws. Overall during 2017 there was a reduction in any gambling activity when compared to the 2016 (48.4%), however there were increases in the proportion of adults who responded that they had participated in any online betting (5.6%
during 2017 compared to 5.4% in 2016) or online gambling (18.3% during 2017 compared to 17.3% in 2016).

11.3 Of those who had stated that they had gambled in person (e.g. placing a bet in a betting shop, visiting a casino or bingo hall, buying lottery tickets or scratch cards in a shop and so on) the most common activity was dog races (78%) followed by National Lottery draws (75.8%). Of those who participated in online gambling sports gambling was the most popular activity (72.5%) followed by ‘betting on other events’ (71.5%).

11.4 Over a third (33.2%) of respondents stated that they had gambled once per week with just over a fifth (20.7%) gambling on two or more occasions in one week. Of those who had placed bets (horse races, dog races, sports betting or betting on other events) during the previous four weeks, a fifth (20%) had betted on two or more days in one week whilst over a quarter (26.7%) had placed a bet once a week.

**Problem Gambling**

11.5 Problem gambling is defined as an overwhelming urge to gamble in spite of negative consequences and the disruption or damage to personal, family or recreational pursuits (NatCen, 2015).

11.6 Data collected by the Gambling Commission suggest that there are approximately 258,000 problem gamblers in England (0.6% of respondents to the survey). Males were more likely to be identified as a problem gambler (1%) when compared to females (0.1%). Those aged 25 to 34 years reported the highest prevalence of problem gambling (1.2%). These estimates are likely to be conservative as the surveys (as mentioned in 11.1) do not include certain population groups more likely to be more vulnerable to harm (e.g. students living in halls of residence, homeless people, armed forces personnel and those in prison) (Gambling Commission, 2018).

11.7 Harm can be caused by problem gambling, evidence suggests that an individual experiencing problem gambling are at greater risk of anxiety, stress, depression, and alcohol and substance misuse (Cowlishaw and Kessler, 2016). These factors do not only affect the individual, but are likely to have a wider impact on family and friends. This can include family breakdown, evidence suggests that there are higher rates of separation and divorce among problem gambler when compared to the general population (DCMS, 2007).

11.8 Gambling problems impact the more deprived communities the most, lower income households spend a larger proportion of their income on gambling (Williams, Rehm and Stevens, 2011), evidence has shown that there are more gambling machines are located in deprived communities (Wardle, Asbury and

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1 A problem gambler is defined as meeting at least three of the Diagnostic and Statistical Manual of Mental Disorders, 4th Edition (DSM-IV) criteria, and eight or more of the Problem Gambling Severity Index (PGSI) items used in the Health Survey.
Thurstain-Goodwin, 2017) and increases in unemployment are associated with increased lottery sales (Wayland, 2012)

11.9 GamCare (a charity supporting problem gamblers) has reported that calls from problem gamblers and affected others increased during 2016/17 by 4% to 29,417 and that clients in treatment across Great Britain increased by 18% to 8,044. The main gambling activities disclosed by callers were machines in betting shops (19%), online betting (16%), online casino games (11%) and online slots (11%). The main gambling facilities (locations) disclosed were online (50%), followed by betting shops (35%) (GamCare, 2017)

11.10 The Authority is concerned about the prevalence of gambling within society and the increase in problem gambling. The Authority will work with the trade and strategic partners to promote the licensing objectives, with particular regard to the need to protect children and other vulnerable persons from being harmed, or exploited, by gambling. We recognise that this is a whole borough issue and we will work holistically together to provide support on addictions, to promote health and wellbeing, to protect the most vulnerable from falling victim to scams, to promote financial inclusion and to address the impacts on individuals, their families and on our communities.

11.11 The Authority will take a robust approach to the enforcement of fraudulent international lottery sweepstake and prize draw scams. We will work closely with the National Trading Standards Scams Team and work with our communities to protect vulnerable people from falling victim to scams and to support those affected.

11.12 We recognise the role of responsible premises in promoting the licensing objectives by ensuring that they carry out risk assessments and adopt appropriate management systems.

References


Gambling Commission (2018) Gambling-related harm as a public health issue: Briefing paper for Local Authorities and local Public Health providers February 2018

GamCare (2017) Briefing paper – GamCare Annual Statistics 2016/17


Williams, R.J., Rehm, J. and Stevens, R.M., (2011) The social and economic impacts of gambling. Faculty of Health Sciences
PART B
PROMOTION OF THE LICENSING OBJECTIVES

12. Licensing Objectives

12.1 Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, this Authority has considered the Gambling Commission’s Guidance and some comments are made below.

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

Crime and Disorder

12.3 The Authority is aware that the Gambling Commission takes a leading role in preventing gambling from being a source of crime. The Gambling Commission’s Guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, where an area has known high levels of organised crime this Authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors.

12.4 The Authority is aware of the distinction between disorder and nuisance and will consider factors (for example whether police assistance was required and how threatening the behaviour was to those who could see it) so as to make that distinction.

12.5 Examples of the specific steps the Authority may take to address this area can be found in the various sections covering specific premises types in Part C of this document and also in Part D which covers permits and notices.

12.6 Ensuring that is conducted in a fair and open way

12.7 The Authority is aware that except in the case of tracks (see page 34) generally the Gambling Commission does not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences. However, the Authority will familiarise itself with operator licence conditions and will communicate any concerns to the Gambling Commission about misleading advertising or any absence of required game rules or other matters as set out in the Gambling Commission’s Licence Conditions and Code of Practice

12.8 Examples of the specific steps the Authority may take to address this area can be found in the various sections covering specific premises types in Part C of this document and also in Part D which covers permits and notices.
12.9 **Protecting children and other vulnerable persons from being harmed or exploited by gambling** –

**Protection of children**

12.10 The Authority has noted the Gambling Commission’s Guidance that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children).

12.11 The Act provides the following definition for child and young adult in Section 45:

**Meaning of “child” and “young person”**

(a) In this Act “child” means an individual who is less than 16 years old.
(b) In this Act “young person” means an individual who is not a child but who is less than 18 years old.

12.12 For the purpose of this section protection of children will encompass both child and young person as defined by the Act.

12.13 The Authority will therefore consider, as suggested in the Gambling Commission's Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances / machines, segregation of areas etc.

12.14 The Authority is also aware of the Gambling Commission Codes of Practice as regards this licensing objective, in relation to specific premises.

12.15 Examples of the specific steps the Authority may take to address this area can be found in the various sections covering specific premises types in Part C of this document and also in Part D which covers permits and notices.

**Protection of vulnerable people**

12.16 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 Authority will consider this licensing objective on a case by case basis.

12.17 An ‘adult as risk’ previously referred to as a vulnerable adult is defined as an adult (a person over the age of 18) in its area (whether or not ordinary resident there) who:
a) has care and support needs regardless of whether or not the authority is meeting any of those needs and;
b) is experiencing, or is at risk of, abuse or neglect and;
C) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

12.18 In the case of premises licences the Authority is aware of the extensive requirements set out for operators in the Gambling Commissions Code of Practice.

12.19 In this document the Gambling Commission clearly describe the policies and procedures that operators should put in place regarding:

- Combating problem gambling
- Access to gambling by children and young persons
- Information on how to gamble responsibly and help for problem gamblers
- Customer interaction
- Self-exclusion
- Employment of children and young persons

12.20 All applicants should familiarise themselves with the operator licence conditions and codes of practice relating to this objective and determine if these policies and procedures are appropriate in their circumstances. The Authority will communicate any concerns to the Gambling Commission about any absence of this required information.

12.21 Applicants may also like to make reference to Warrington Safeguarding Adults Board which provides extensive guidance on identifying vulnerable people and what can be done to reduce risk for this group. This document can be accessed via http://www.warrington.gov.uk.

12.22 Applicants should consider the following proposed measures for protecting and supporting vulnerable persons, for example:

- leaflets offering assistance to problem gamblers should be available on gambling premises in a location that is both prominent and discreet, such as toilets
- training for staff members which focuses on building an employee’s ability to maintain a sense of awareness of how much (e.g. how long) customers are gambling, as part of measures to detect persons who may be vulnerable. (see 12.4.7)
- trained personnel for the purpose of identifying and providing support to vulnerable persons
- self-exclusion schemes
- operators should demonstrate their understanding of best practice issued by organisations that represent the interests of vulnerable people
- posters with GamCare helpline and website in prominent locations
• windows, entrances and advertisements to be positioned or designed not to entice passers-by.

12.23 It should be noted that some of these measures form part of the mandatory conditions placed on premises licences.

12.24 The Authority may consider any of the above or similar measures as licence conditions should these not be adequately addressed by any mandatory conditions, default conditions or proposed by the applicant.

**Selling of Lottery tickets and Scratchcard games**

12.25 The Authority recognises that the National Lottery Commission regulates all aspects of the operation of the National Lottery, including the draw-based games, scratchcards and what are known as the Instant Win Games (which you refer to as the 'virtual cards' on the internet); the Gambling Commission regulates other forms of gambling in the UK. Further information regarding the role of the National Lottery Commission can be found on their website [www.natlotcomm.gov.uk](http://www.natlotcomm.gov.uk).

12.26 Shops and supermarkets are the most popular places for children to get tickets for National Lottery games and scratchcards. It is hugely important to note that it is an offence to sell a lottery ticket or scratchcard to children and young people under the age of 16. The penalty for selling to an underage person is a fine of up to £5,000 and/or 2 years imprisonment.

12.27 Should the Authority receive any complaints of irresponsible retailing from operators on lottery tickets or scratchcards, the Authority will look to work collaboratively with the, Gambling Commission, the Licensing Enforcement Team, Trading Standards and the Police Authority to carry out enforcement practices.

**How should operators protect themselves?**

12.28 *Lottery and scratchcards are age-restricted products.*

12.29 *There are several checks and measures that operators can put into place to protect themselves from prosecution.*

- Consider introducing an age verification policy such as Challenge 21/25 whereby anyone who appears to be under the age of 21/25 is asked to prove their age.
- If you are in doubt as to a customer's age you should always ask for proof of age.
- You should request them to produce a reliable, acceptable form of proof of age such as a valid passport, a valid photo card driving licence, H.M.
Forces Warrant Card or a Proof of Age Standards Scheme (PASS) ID Card. The PASS scheme is the UK’s national Proof of Age Standards Scheme and all cards meeting this standard bear an accredited hologram.

- Birth certificates and National Insurance cards should not be accepted as proof of age. They do not show a photograph of the person producing the document and National Insurance cards are issued before a person has reached their sixteenth birthday.

- Keep a refusals register, written or electronic. This is a record of all the times that you refuse to sell an age-restricted product. Details kept in the register should contain a description of the person, their name and address (if you are able to obtain or know it), their approximate age, the date and time of the attempted purchase, the type of product that was requested and finally the reason for refusing the sale.

- Display all age restriction notices prominently. You can get these from the Business Compliance Team (e-mail tradingstandards@warrington.gov.uk)

- Train all of your staff on the relevant legislation and hand out the written instructions on the checks that should be carried out.

- Keep a training record for each member of staff and keep it up to date. Ask staff to sign a copy of the instructions that they receive, to show that they have read and understood the contents. Ask them to sign and date the training record as well.

- Regularly check your systems and procedures to ensure staff are following them.

- Keep up to date with changes in legislation that may affect your business.

12.30 The Authority also operates a partnership approach to dealing with enforcement matters concerning licensed premises. This may include working with the Gambling Commission, Police Authority, or any of the other responsible authorities under the Gambling Act 2005, or working with colleagues from other Council departments or outside agencies.
PART C

PREMISES LICENCES: CONSIDERATION OF APPLICATIONS

13. **General Principles**

13.1 Premises licences are subject to the permissions/restrictions set out in the Act and regulations, as well as specific mandatory and default conditions which are detailed in regulations issued by the Secretary of State. The Authority is able to exclude default conditions and also attach others, where it is believed to be appropriate.

**Decision-making**

13.2 The Authority is aware that in making decisions about premises licences it should aim to authorise the use of premises for gambling:

- in accordance with any relevant code of practice issued by the Gambling Commission;
- in accordance with any relevant guidance issued by the Gambling Commission;
- where reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of licensing policy.

13.3 It is appreciated that as per the Gambling Commission's Guidance to Licensing Authorities "moral objections to gambling are not a valid reason to reject applications for premises licences" (except as regards any 'no casino resolution' - see section on Casinos – page 29) and also that unmet demand is not a criterion for a licensing authority.

13.4 The Authority will also have due regard to the Gambling Commission’s guidance on ensuring that betting is the primary activity of a licensed premises. Gaming machines may be made available for use in licensed betting premises only at times when there are also sufficient facilities for betting available. Operators will need to demonstrate that betting will continue to be the primary activity of the premise when seeking variations to licences.

13.5 In making this determination, the Authority will have due regard to the six indicators of betting as a primary gambling activity:

- The offer of established core products (including live event pictures and bet range)
- The provision of information on products and events
- The promotion of gambling opportunities and products
- The actual use made of betting facilities
- The size of premises
- The delivery of betting facilities
**Definition of “premises”**

13.6 In the Act, "premises" is defined as including "any place". Section 152 therefore prevents more than one premises licence applying to any place. However, it is possible for a single building to 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 be reasonably 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. Whether different parts of a building can properly be regarded as being separate premises will always be a question of fact in the circumstances. However, particular attention will be paid where there are issues about sub-divisions of a single building or plot to ensure that mandatory conditions relating to access between premises are observed.

13.7 The Gambling Commission states in the fifth edition of its 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 being 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 for discussion between the operator and the licensing officer. However, the Gambling Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises."

13.8 The Authority will 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 Authority will assess entrances and exits from parts of a building covered by one or more licences to satisfy itself that they are separate and identifiable so that the separation of different premises is not compromised and that people do not ‘drift’ into a gambling area.

13.9 The Authority will pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed). Issues that the Authority will consider before granting such applications include the following measures:

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating.
• Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not “drift” into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit.
• Customers should be able to participate in the activity names on the premises licence.
• The Guidance also gives a list of factors which the Authority 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?

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

13.11 The Gambling Commission’s relevant access provisions for each premises type are reproduced below:

**Casinos**

• The principal access entrance to the premises must be from a street (defined as any bridge, road, lane, footway, subway, square, court, alley, or passage whether a thoroughfare or not).
• No entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons.
• No customer must be able to enter a casino directly from any other premises which holds a gambling premises licence.
  (See paragraph 16 for further details on Casinos)

**Adult Gaming Centre**

• No customer must be able to access the premises directly from any other licensed gambling premises.
  (See paragraph 14 for further details on Adult Gaming Centres)

**Betting Shops**

• Access must be from a street (see definition above) or from another premises with a betting premises licence.
• No direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind and you could not have a betting shop at the back of a café – the whole area would have
to be licensed.
(See paragraph 18 for further details on Betting Shops)

Tracks

- No customer should be able to access the premises directly from:
  - a casino
  - an adult gaming centre.
(See paragraph 19 for further details on Tracks)

Bingo Premises

- No customer must be able to access the premise directly from:
  - a casino
  - an adult gaming centre
  - a betting premises, other than a track.
(See paragraph 17 for further details on Bingo Premises)

Family Entertainment Centre

- No customer must be able to access the premises directly from:
  - a casino
  - an adult gaming centre
  - a betting premises, other than a track.

13.12 Gambling Commission’s Guidance to Licensing Authorities contains further guidance on this issue, which this Authority will take into account.

13.13 An applicant cannot obtain a full premises licence until they have the right to occupy the premises to which the application relates.
(See paragraph 15 for further details on Family Entertainment Centres)

Premises “ready for gambling”

13.14 The Guidance states that a licence to use premises for gambling should only be issued in relation to premises that the Authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

13.15 If the construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them, then an application for a provisional statement should be made instead.

13.16 In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, this Authority 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.

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

13.18 More detailed examples of the circumstances in which such a licence may be granted can be found at paragraphs 7.58 – 7.63 of the Gambling Commission Guidance.

**Location**

13.19 The Authority is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision-making. As per the Gambling Commission’s Guidance to Licensing Authorities, the Authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

13.20 With regards to these objectives the Authority will upon receipt of any relevant representations look at specific location issues including:

- the possible impact a gambling premises may have on any premises that provide services to children or young people, i.e. a school, or vulnerable adult centres in the area.
- the possible impact a gambling premises may have on residential areas where there may be a high concentration of families with children
- the size of the premises and the nature of the activities taking place
- any levels of organised crime in the area.

13.21 The Authority will take into account the Local Area profile (see below) and Applicants are advised to have regard to it when considering if a Premises Licence in a particular location would undermine the licensing objectives and should consider if any possible harm could be mitigated by the attaching of appropriate conditions. Each application will be considered on its own merits.

**Local Risk Assessments**

13.22 From 6 April 2016, it is a requirement of the Gambling Commission’s Licence Conditions and Codes of Practice (LCCP), under section 10, for licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at their premises and have policies, procedures and control
measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in this policy.

13.23 The LCCP goes on to say licensees must review (and update as necessary) their local risk assessments:

a. to take account of significant changes in local circumstance, including those identified in this 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.

13.24 The Authority will expect the local risk assessment to consider as a minimum:

- whether the premises is in an area of deprivation
- whether the premises is in an area subject to high levels of crime and/or disorder
- the ethnic profile of residents in the area
- the demographics of the area in relation to vulnerable groups
- the location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather

13.25 In any case the local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected.

13.26 Other matters that the assessment may include:

- The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
- Details as to the location and coverage of working CCTV cameras, and how the system will be monitored.
- The layout of the premises so that staff have an unobstructed view of persons using the premises
- The number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those persons using the premises.
- Arrangements for monitoring and dealing with under age persons and vulnerable persons, which may include dedicated and trained personnel, leaflets, posters, self-exclusion schemes, window displays and advertisements not to entice passers-by etc.
- The provision of signage and documents relating to games rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality.
• Where the application is for a betting premises licence, other than in respect of a track, the location and extent of any part of the premises which will be used to provide facilities for gambling in reliance on the licence.

13.27 Such information may be used to inform the decision the Authority makes about whether to grant the licence, to grant the licence with special conditions or to refuse the application.

13.28 It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome

Local Area Profile

13.29 Each locality has its own character and challenges. In order to assist applicants, where there is an issue in a local area which impacts on how the applicant should complete their risk assessment, The Council has published a local area licensing guidance in partnership with responsible authorities, other local agencies such as public health, mental health, housing, education, community welfare group and community safety groups and organisations such as the Gamcare or equivalent local organisations. It can be obtained from the Licensing Section or via the Council’s website www.warrington.gov.uk.

13.30 The Local area profile should be given careful consideration when making an application. Applicants may be asked to attend a meeting with licensing officers to discuss the measures suggested in the guidance and how they might be relevant to their application. The Local Area Profile will be presented to any subsequent Licensing sub-committee when they determine an application that has received representations.

13.31 The Authority recognises that it cannot insist on applicants using the Local Area Profile when completing their risk assessments. However, an applicant who decides to disregard it may face additional representations and the expense of a hearing as a result.

Planning

13.32 The Gambling Commission Guidance to Licensing Authorities states:

In determining applications the licensing authority has a duty to take into consideration all relevant matters and not to take into consideration any irrelevant matters, i.e. those not related to gambling and the licensing objectives. One example of an irrelevant matter would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal.

13.33 Equally the grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building. The Authority will give due regard to the Gambling Commission Guidance on the
consideration of Planning and Building Regulations and on the use of Provisional statements in respect of unbuilt or unfinished premises.

13.34 The Authority will consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions should such a situation arise.

13.35 The Authority will bear in mind that a premises licence, once it comes into effect, authorises premises to be used for the gambling activity named on the licence.

Duplication with other regulatory regimes

13.36 The Authority will seek to avoid any duplication with other statutory/regulatory systems where possible, including planning. The Authority cannot not consider whether a licence application is likely to be awarded planning permission or building regulations approval, in its consideration of it.

13.37 When dealing with a premises licence application for finished buildings, the Authority will not take into account whether those buildings have to comply with the necessary planning or buildings consents. However, it will consider carefully, any concerns about proposed conditions which are not able to be met by the applicant due to planning restrictions, should such a situation arise.

13.38 Fire or health and safety risks will not be taken into account, as these matters are dealt with under relevant planning control, buildings and other regulations and must not form part of the consideration for the premises licence.

Conditions

13.39 The Authority is aware that the Secretary of State has set mandatory conditions and default conditions and the Gambling Commission has set Licence Conditions and Codes of Practice which are necessary for the general good conduct of gambling premises, therefore it is unlikely that the Authority will need to impose individual conditions imposing a more restricted regime in relation to matters that have already been dealt with.

13.40 Where there are specific risks or problems associated with a particular locality, or specific premises, or class of premises, The Authority will attach individual conditions to address this.

13.41 Any conditions attached to licences will be proportionate and will be:

- relevant to the need to make the proposed building 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 respects.

13.42 Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures The Authority will consider utilising should there be a perceived need, such as the use of supervisors, supervision of adult gaming machines, appropriate signage for adult only areas etc. There are specific comments made in this regard under some of the licence types below. The Authority will also expect the licence applicant to offer his/her own suggestions as to ways in which the licensing objectives can be met effectively.

13.43 The Authority will also consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Gambling Commission’s Guidance.

13.44 The Authority will also ensure that where category C or above machines are on offer in premises to which children are admitted:

- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose a rope, floor markings or similar provision will not suffice and the licensing authority may insist on a permanent barrier of at least 1 meter high;
- only adults are admitted to the area where these machines are located;
- access to the area where the machines are located is supervised;
- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and
- at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

13.45 Where certain measures are not already addressed by the mandatory/default conditions or by the applicant, the Authority may consider licence conditions to cover issues such as:

- Proof of age schemes
- CCTV
- Supervision of entrances
- Supervision of machine areas
- A reduction in the number of betting machines (betting premises)
- The manning of premises
- Physical separation of areas
- Location of entrance points
- Notices / signage
• Specific opening hours
• A requirement that children must be accompanied by an adult
• Enhanced DBS checks of the applicant and/or staff
• Self-exclusion schemes
• Support to persons with gambling addiction e.g. provision of information leaflets/helpline numbers for organisations such as GamCare.
• Policies to address seasonal periods where children may more frequently attempt to gain access to premises and gamble such as pre and post school hours, half terms and summer holidays
• Policies to address the problems associated with truant children who may attempt to gain access to premises and gamble
• Any one or a combination of the measures as set out under Part B policy (paragraph 12.4) of this document.

13.46 This list is neither mandatory nor exhaustive and is merely indicative of examples of certain measures which may satisfy the requirements the Authority and the Responsible Authorities, depending on the nature and location of the premises and the gambling facilities to be provided.

13.47 These considerations will apply to premises including buildings where multiple premises licences are applicable.

13.48 The Authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, The Authority will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

13.49 It is noted that there are conditions which the Authority cannot attach to premises licences which are:

• any condition on the premises licence which makes it impossible to comply with an operating licence condition;
• conditions relating to gaming machine categories, numbers, or method of operation;
• conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and
• conditions in relation to stakes, fees, winning or prizes.
Door Supervisors

13.50 The Gambling Commission advises in its Guidance to Licensing Authorities that if a licensing authority is concerned that a premises may attract disorder or be subject to attempts at unauthorised access (for example by children and young persons) then it may require that the entrances to the premises are controlled by a door supervisor, and is entitled to impose a premises licence to this effect.

13.51 Where it is decided that supervision of entrances/machines is appropriate for particular cases, a consideration of whether these need to be SIA licensed or not will be necessary. It will not automatically be assumed that they need to be licensed, as the statutory requirements for different types of premises.

13.52 It is noted though that the Gambling Act 2005 has amended the Private Security Industry Act 2001 and that door supervisors at casinos or bingo premises are not required to be licensed by the Security Industry Authority. Where door supervisors are provided at these premises the operator should ensure that any persons employed in this capacity are fit and proper to carry out such duties. Possible ways to achieve this could be to carry out a Disclosure and Barring Service (DBS) on potential staff and for such personnel to have attended industry recognised training.

14. Adult Gaming Centres

14.1 Under the Act a premises holding an adult gaming centre licence will be able to make category B, C and D gaming machines available and no one under 18 will be permitted to enter such premises (see Appendix 3).

14.2 The Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.

14.3 Where certain measures are not already addressed by the mandatory and default conditions and the Gambling Commission Codes of Practice or by the applicant, the Authority may consider licence conditions to address such issues, examples of which are provided at paragraph 13.43.

15. (Licensed) Family Entertainment Centres

15.1 Licensed family entertainment centres are those premises which usually provide a range of amusements such as computer games, penny pushers and may have a separate section set aside for adult only gaming machines with higher stakes and prizes.
15.2 Licensed family entertainment centres are able to make available unlimited category C and D machines where there is clear segregation in place so children do not access the areas where the category C machines are located (see Appendix 3).

15.3 Where category C or above machines are available in premises to which children are admitted then the Authority will ensure that:

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose a rope, floor markings or similar provision will not suffice and the licensing authority may insist on a permanent barrier of at least 1 meter high.

- only adults are admitted to the area where the machines (category C) are located

- access to the area where the machines are located is supervised at all times

- the area where the machines are located is arranged so that it can be observed by staff; and

- at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

15.4 The Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the licensing authority, for example, that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas.

15.5 The Authority will expect applicants to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations.

15.6 The efficiency of such policies and procedures will each be considered on their merits, however, they may include:

- appropriate measures and training for staff as regards suspected truant children on the premises

- measures and training covering how staff would deal with unsupervised very young children being on the premises

- measures and training covering how staff would deal with children causing perceived problems on or around the premises.

- the arrangements for supervision of premises either by staff or the use of CCTV. Any CCTV system installed should both the interior and the entrance working to the latest Home Office and ACPO standards and to the satisfaction of Cheshire Police and the Authority. The system must record
images clearly and these recordings be retained for a minimum of 31 days. If the equipment is inoperative the Police and the Authority must be informed as soon as possible and immediate steps taken to make the system operative. Notices must be displayed at the entrances advising that CCTV is in operation.

15.7 Due to the nature of these premises, which are attractive to children, applicants who employ staff to supervise the premises should consult with the Independent Safeguarding Authority to determine if their staff need to be DBS checked.

15.8 The Authority will, as per the Gambling Commission’s Guidance, also refer to the Commission’s website to see any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated. The Authority will also consider any mandatory or default conditions and any Gambling Commission Codes of Practice on these premises licences, when they have been published.

16. **Casinos**

16.1 The Gambling Act states that a casino is an arrangement whereby people are given the opportunity to participate in one or more casino games whereby casino games are defined as a game of chance which is not equal chance gaming. This means that casino games offer the chance for multiple participants to take part in a game competing against the house or bank at different odds to their fellow players. Casinos can also provide equal chance gaming and gaming machines. Large and small casinos can also provide betting machines.

16.2 The Authority has not passed a ‘no casino’ resolution under Section 166 of the Gambling Act 2005, but are aware that The Authority has the power to do so. Should such a resolution be passed, this Policy will be updated. Any such decision will be made by the Full Council.

16.3 Conditions will be attached to Casino Premises Licences according to the principles set out in part 9 of the Gambling Commission’s Guidance, bearing in mind the mandatory conditions listed in part 17 of the Guidance, and the Licence Conditions and Codes of Practice published by the Gambling Commission.

16.4 In accordance with the Gambling Commission’s Guidance the Authority will take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.
17. **Bingo premises**

17.1 There is no official definition for bingo in the Gambling Act 2005 however from a licensing point of view there is a category of premises licence specifically for bingo premises which is used by traditional commercial bingo halls for both cash and prize bingo. In addition this premises licence will authorise the provision of a limited number of gaming machines in line with the provisions of the Act (see Appendix 3).

17.2 The Authority notes that the Gambling Commission’s Guidance states:

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.

17.3 From 13 July 2011 a holder of bingo premises licences may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises.

17.4 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. The Authority will expect premises to apply the following measures:

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose a rope, floor markings or similar provision will not suffice and The Council may insist on a permanent barrier of at least one meter high
- only adults are admitted to the area where the machines are located
- access to the area where the machines are located is supervised at all times
- the area where the machines are located is arranged so that it can be observed by staff at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18
- children will not be admitted to bingo premises unless accompanied by an adult.

17.5 Where certain measures are not already addressed by the mandatory/default conditions, the Gambling Commission Code of Practice or the applicant, The Authority may consider licence conditions to address such issues, examples of which are provided at paragraph 13.43.
18. **Betting premises**

18.1 Betting premises are premises such as bookmakers where various types of gambling are authorised to take place. The Act contains a single class of licence for betting premises however within this single class there are different types of premises which require licensing such as high street bookmakers, bookmakers located in self-contained facilities at race courses as well as the general betting premises licences that track operators will require.

18.2 In accordance with the Gambling Commission's Guidance the Authority will take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.

18.3 Where an applicant for a betting premises licence intends to offer higher stake category B gaming machines (categories B2-B4) including any Fixed Odds Betting Terminals (FOBTs), then applicants should consider the control measures related to the protection of vulnerable persons, highlighted in paragraph 12.4.

18.4 Where certain measures are not already addressed by the mandatory/default conditions, Gambling Commission Code of Practice or the applicant, licence conditions to address such issues may be considered.

19. **Tracks**

19.1 Tracks are sites (including racecourses and dog tracks) where races or other sporting events take place. Betting is a major gambling activity on tracks, both in the form of pool betting (often known as the “totaliser” or “tote”), and also general betting, often known as “fixed-odds” betting. Multiple betting outlets are usually located on tracks such as ‘on course’ betting operators who come onto the track just on race days to provide betting for the races taking place on that track. There can also be ‘off-course’ betting operators who may operate self-contained facilities at the tracks which offer customers the chance to bet on other events, not just those taking place on the track.

19.2 All tracks will require a primary ‘general betting premises licence’ that the track operator will hold. It should be noted that track operators do not require an operating licence from the Gambling Commission although they may apply for one. This is because the various other gambling operators offering betting at the track will each hold an operating licence.

19.3 Tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. The Authority will consider the impact upon the third licensing objective (i.e. the protection of children and vulnerable persons from being harmed or exploited by gambling) and the need to
ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

19.4 This Authority will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog-racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

19.5 This Authority may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- A requirement that children must be accompanied by an adult
- Policies to address the problems associated with truant children who may attempt to gain access to premises and gamble
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare.

19.6 The above list is not mandatory, nor exhaustive, and is merely indicative of example measures.

19.7 Gaming machines - Where the applicant holds a pool betting operating licence and is going to use the entitlement to four gaming machines, machines (other than category D machines) should be located in areas from which children are excluded.

19.8 Betting machines - This Authority will take into account the size of the premises and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator proposes to offer.

20. Applications and plans

20.1 The Gambling Act requires applicants to submit plans of the premises with their application, in order to ensure that the Authority has the necessary information to make an informed judgement about whether the premises are fit for gambling. The plan will also be used for the Authority to plan future premises inspection activity.
20.2 Plans for tracks do not need to be in a particular scale, but should be drawn to scale and should be sufficiently detailed to include the information required by regulations.

20.3 Some tracks may be situated on agricultural land where the perimeter is not defined by virtue of an outer wall or fence, such as point-to-point racetracks. In such instances, where an entry fee is levied, track premises licence holders may erect temporary structures to restrict access to premises.

20.4 In the rare cases where the outer perimeter cannot be defined, it is likely that the track in question will not be specifically designed for the frequent holding of sporting events or races. In such cases betting facilities may be better provided through occasional use notices where the boundary premises do not need to be defined.

20.5 It is sometimes difficult to define the precise location of betting areas on tracks. The precise location of where betting facilities are provided is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties associated with pinpointing exact locations for some types of track. Applicants should provide sufficient information in order that we can satisfy ourselves that the plan indicates the main areas where betting might take place. For racecourses in particular, any betting areas subject to the “five times rule” (commonly known as betting rings) must be indicated on the plan.

21. Travelling Fairs

21.1 Travelling fairs have the right to provide an unlimited number of category D gaming machines and/or equal chance prize gaming (without the need for a permit) as long as the gambling amounts to no more than an ancillary amusement at the fair (see Appendix 3).

21.2 The Authority is responsible for deciding whether, where category D machines and / or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

21.3 The Authority will also consider whether the applicant falls within the statutory definition of a travelling fair.

21.4 It is noted that the 27-day statutory maximum for the land being used as a fair applies on a per calendar year basis, and that it applies 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. The Authority will work with its neighbouring authorities to ensure that land which crosses our boundaries is monitored so that the statutory limits are not exceeded.
22. Provisional Statements

22.1 Developers may wish to apply to this Authority for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.

22.2 Section 204 of the Gambling Act provides for a person to 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.

22.3 The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible Authorities and interested parties may make representations and there are rights of appeal.

22.4 In contrast to the premises licence application, the applicant does not have to hold or have applied for an operating licence from the Gambling Commission (except in the case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made. Tracks do not require an operating licence.

22.5 The holder of a provisional statement may then apply for a premises licence once the premises are constructed, altered or acquired. There is some constraint in the matters considered when determining the premises licence application, and in terms of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can 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.

22.6 In addition, The Authority 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 by objectors at the provisional statement stage;
- which in the Authority’s opinion reflect a change in the operator’s circumstances; or
- where the premises has not been constructed in accordance with the plan
Requests for a review of a premises licence can be made by interested parties or responsible authorities; however, it is for the Authority to decide whether the review is to be carried out. This will be on the basis of whether the request for the review is relevant to the matters listed below:

- 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 the authority’s statement of principles.

The Authority may reject the application for a review if it considers that the grounds on which the review is sought

- are frivolous,
- are vexatious,
- will “certainly not” cause this Authority to wish to alter/revoke/suspend the licence or remove or amend one or more of the conditions on the licence, is substantially the same as previous representations or requests for review (and the Authority will take into account any lapse of time since the previous representation or request)
- Fails to raise a ground which is relevant to the licensing objectives

The Authority can also initiate a review of a particular premises licence, or a particular class of premises licence on the basis of any appropriate reason.

Once a valid application for a review has been received, representations can be made by responsible authorities and interested parties during a 28 day period. This period begins seven days after the application was received by the Authority. The Authority will publish notice of the application for review within that seven days period.

The Authority must carry out the review as soon as possible after the end of the 28 day period for making representations has passed.

The purpose of the review will be to determine whether the Authority should take any action in relation to the licence. If action is justified, the options are:-
(a) add, remove or amend a licence condition imposed by the licensing authority;
(b) exclude a default condition imposed by the Secretary of State (e.g. opening hours) or remove or amend such an exclusion;
(c) suspend the premises licence for a period not exceeding three months; or
(d) revoke the premises licence.

23.8 In determining what action, if any, should be taken following a review, the Authority must have regard to the principles set out in section 153 of the Act, as well as any relevant representations.

23.9 The Authority may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.

23.10 Once the review has been completed, The Authority must, as soon as possible, notify its decision to:

- the licence holder
- The applicant for review (if any)
- the Gambling Commission
- any person who made representations
- the Chief Officer of Police or Chief Constable; and
- Her Majesty’s Commissioners for Revenue and Customs.
PART D
PERMITS/TEMPORARY AND OCCASIONAL USE NOTICE

24. PERMITS

24.1 Permits regulate gambling and the use of gaming machines in a premises which does not hold a premises licence. They are required when a premises provides gambling facilities but either the stakes are very low or gambling is not the main function of the premises.

24.2 The Authority is responsible for issuing the following permits:

(a) unlicensed family entertainment centre gaming machine permits;
(b) alcohol-licensed premises gaming machine permits;
(c) prize gaming permits;
(d) club gaming permits and club machine permits.

24.3 The Authority can only grant or reject an application for a permit and cannot attach conditions. Therefore, the Authority will consider a number of factors before determining an application for a permit to ensure that the permit holder and the premises are suitable for the proposed gambling activities.

25. (Unlicensed) Family Entertainment Centre gaming machine permits

25.1 The term ‘unlicensed family entertainment centre’ is one defined in the Act and refers to a premises which provides category D gaming machines along with various other amusements such as computer games and penny pushers. The premises is ‘unlicensed’ in that it does not require a premises licence but does require a permit to be able to provide category D machines. It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (Section 238 of the Gambling Act).

25.2 An application for a permit may be granted only if the licensing authority is satisfied that the premises will be used as an unlicensed FEC, and if the chief officer of police has been consulted on the application. Licensing authorities might wish to consider asking applicants to demonstrate:

- a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs;
- that the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act); and
- that staff are trained to have a full understanding of the maximum stakes and prizes.

25.3 It should be noted that a licensing authority cannot attach conditions to this type of permit.
25.4 The Authority will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits, however, they may include:

- appropriate measures/training for staff as regards suspected truant school children on the premises;
- measures/training covering how staff would deal with unsupervised very young children being on the premises;
- measures/training covering how staff would deal with children causing perceived problems on or around the premises.
- measures/training covering how staff would identify the signs and symptoms of persons engaged in the illegal use of controlled drugs.
- the arrangements for supervision of premises either by staff or the use of CCTV. Any CCTV system installed should both the interior and the entrance working to the latest Home Office and ACPO standards and to the satisfaction of Cheshire Police and the Authority. The system must record images clearly and these recordings be retained for a minimum of 31 days. If the equipment is inoperative the police and local authority must be informed as soon as possible and immediate steps taken to make the system operative. Notices must be displayed at the entrances advising that CCTV is in operation.

26. Gaming machines in premises licensed for the sale of alcohol

26.1 There is provision in the Licensing Act 2003 for premises licensed to sell alcohol for consumption on the premises to automatically have 2 gaming machines, of categories C and/or D. The holder of a premises licence under the Licensing Act 2003 with the licensable activity for the sale of alcohol on the premises must notify the Authority of their intention to make the gaming machines available for use and must pay the prescribed fee.

26.2 The Authority can remove the automatic authorisation in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (s.282 requires that written notice has been provided to the licensing authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with);
- the premises are mainly used for gaming; or
- an offence under the Gambling Act has been committed on the premises.
3 or more machines

26.3 A person or organisation holding a Premises Licence for the sale of alcohol on the premises pursuant to the Licensing Act 2003 may apply for a licensed premises gaming machine permit where more than two machines are required setting out the number and category of gaming machines sought. The Authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and "such matters as they think relevant."

26.4 The Authority will consider applications on a case by case basis but will have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling. The applicant will be expected to demonstrate that there will be sufficient measures to prevent children or young persons accessing the adult only gaming machines. Such steps may include (but are not limited to);

- locating the adult machines within sight of the bar area
- measures/training covering how staff would deal with unsupervised young children being on the premises
- CCTV/surveillance measures
- Notices/signage

Applicants will be expected to demonstrate how vulnerable persons will be protected from harm. This may include the availability of leaflet/helpline numbers for organisations such as GamCare.

Each application will be determined on its own merits and applicants will need to consider how their proposal can best engage with the licensing objectives. Applicants should also note the Code of Practice for gaming machines in Clubs and premises with an alcohol licence available on the Gambling Commission’s website.

26.5 It is recognised that some premises licensed for the sale or supply of alcohol under the Licensing Act 2003 may apply for a gambling premises licence for areas which do not benefit from the alcohol licence. Such applications will be processed under the relevant provisions of the Act.

26.6 It should be noted that the Authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for or can refuse the application. Before doing so, the Authority may consult with the Gambling Commission and Police and will invite submissions (either orally or in writing) from the Applicant. If after considering the submissions the Authority refuses the application or grants with a smaller number of machines and/or a different category of machines than that applied for the Authority will provide reasons. There is a right of appeal.

26.7 It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.
26.8 Alcohol licensed premises are able to provide some limited equal chance gaming. Licensees are referred to the advice provided by the Gambling Commission and Appendix 3 of this document.

27. Prize Gaming Permits

27.1 Section 288 defines gaming as prize gaming if the nature and size of the prize is not determined by the number of people playing or the amount paid for or raised by the gaming. The prizes will be determined by the operator before play commences. Prize gaming can often be seen at seaside resorts in amusement arcades where a form of bingo is offered and the prizes are displayed on the walls.

27.2 A prize gaming permit is a permit issued by the Authority to authorise the provision of facilities for gaming with prizes on specified premises. The Authority must consult with the Chief Officer of Police before granting a permit and must have regard to any objection made by the police.

27.3 When considering the suitability of an applicant for a prize gaming permit the Authority expects that the applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:

- that they understand the limits to stakes and prizes that are set out in Regulations;
- that the gaming offered is within the law;
- clear policies that outline the steps to be taken to protect children from harm. These may include:
  - appropriate measures and training for staff as regards suspected truanting children on the premises
  - measures and training covering how staff would deal with unsupervised very young children being on the premises
  - measures and training covering how staff would deal with children causing perceived problems on or around the premises.
  - the arrangements for supervision of premises either by staff or the use of CCTV. Any CCTV system installed should both the interior and the entrance working to the Home Office and ACPO standards as described PSDB leaflet 09/05 and to the satisfaction of Cheshire Police and the licensing authority. The system must record images clearly and these recordings be retained for a minimum of 31 days. If the equipment is inoperative the police and local authority must be informed as soon as possible and immediate steps taken to make the system operative. Notices must be displayed at the entrances advising that CCTV is in operation.

27.4 Due to the nature of these premises, which are attractive to children, applicants who employ staff to supervise the premises should consult with the Independent Safeguarding Authority to determine if their staff need to be DBS checked.
27.5 The Authority in making a decision on an application for this type of permit does not need to but may have due regard to the licensing objectives but must have due regard to any Gambling Commission guidance. (Gambling Act 2005, Schedule 14 paragraph 8(3)).

27.6 Applicants only need to address the Policy when making their initial applications and not at renewal time.

27.7 Mandatory conditions prescribed by the Act will be attached to the permit, if granted. These are:-

- the limits on participation fees, as set out in regulations, must be complied with;
- all chances to participate in the gaming must be allocated on the premises on where the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- participation in the gaming must not entitle the player to take part in any other gambling.
- No further conditions will be attached.

27.8 The Authority will not refuse an application for a permit without first giving the application to make submissions (either in writing or in person) which the Authority will consider. If thereafter refused, the Authority will give reasons. There is a right of appeal.

28. Club Gaming and Club Machines Permits

28.1 Members’ Clubs and Miners’ Welfare institutes (but not Commercial Clubs) may apply for a Club Gaming Permit. The ‘Club gaming permit’ will enable the premises to provide gaming machines (three machines of categories B4, C or D), equal chance gaming i.e. poker, bingo etc. A ‘Club Machine Permit’ will enable the premises to provide gaming machines (three machines of categories B4, C or D).

28.2 Members’ Clubs and Miners’ welfare institutes – and also Commercial Clubs – may apply for a Club Machine Permit only. A Club Machine permit will enable the premises to provide gaming machines (3 machines of categories B, C or D). NB Commercial Clubs may not site category B3A gaming machines offering lottery games in their club.
28.3 The Gambling Commission’s Guidance states:

“Members’ clubs must have at least 25 members and be established and conducted “wholly or mainly” for purposes other than gaming, unless the gaming is permitted by separate regulations. The Secretary of State has made regulations and these cover bridge and whist clubs, which must be permanent in nature, not established to make commercial profit and controlled by its members equally. Examples include working men’s clubs, branches of Royal British Legion and clubs with political affiliations”.

28.4 Clubs must have regard to the protection of children and vulnerable persons from harm or being exploited by gambling. They must provide sufficient measures to ensure that under 18 year olds do not use the adult only gaming machines. These measures may include:

- the machines being in close proximity to the bar, or in any other area where they are capable of being adequately supervised
- notices and signage
- the provision of information leaflets/helpline numbers for organisations such as GamCare.

28.5 Before granting the permit the Authority must be satisfied that the premises meets the requirements of a members’ club and that the majority of members are over 18.

28.6 The Commission Guidance also notes that "licensing authorities may only refuse an application on the grounds that:

(a) the applicant does not fulfil the requirements for a members’ or commercial club or miners’ welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
(b) the applicant’s premises are used wholly or mainly by children and/or young persons;
(c) an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;
(d) a permit held by the applicant has been cancelled in the previous ten years; or
(e) an objection has been lodged by the Gambling Commission or the Police”.

28.7 There is also a ‘fast-track’ procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). Commercial clubs who hold a Premises Licence under the Licensing Act 2003 cannot use the fast-track procedure.

28.8 As the Gambling Commission’s Guidance to Licensing Authorities states: "Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the Police, and the grounds upon which an authority can refuse a
permit are reduced." and "The grounds on which an application under the process may be refused are:

(a) that the club is established primarily for gaming, other than gaming prescribed under schedule 12;
(b) that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
(c) that a Club Gaming Permit or Club Machine permit issued to the applicant in the last ten years has been cancelled."

28.9 There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

29. **Temporary Use Notices**

29.1 Temporary Use Notices allow the use of premises on not more than 21 days in any 12 month period for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Gambling Commission, would include hotels, conference centres and sporting venues.

29.2 The Authority can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e. a non-remote casino operating licence.

29.3 A temporary use notice must be lodged with the Authority not less than three months and one day before the day on which the gambling is due to take place. Detailed information about how to serve a temporary use notice will be available in a separate guidance note.

29.4 The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices. The relevant regulations (SI no 3157: The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that Temporary Use Notices can only be used to permit the provision of facilities for equal chance gaming, where the gaming is intended to produce a single winner, which in practice means poker tournaments.

29.5 There are a number of statutory limits as regards Temporary Use Notices. The meaning of "premises" in Part 8 of the Act is discussed in Part 7 of the Gambling Commission Guidance to Licensing Authorities. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place".
29.6 In considering whether a place falls within the definition of "a set of premises", the Authority will consider, amongst other things, the ownership/occupation and control of the premises.

29.7 The Authority may object to notices where it appears that their effect would be to authorise regular gambling in a place that could be described as one set of premises, as recommended in the Gambling Commission’s Guidance to Licensing Authorities.

30. **Occasional Use Notices:**

30.1 Notices must be served on the Authority and copied to the Chief of Police by the administrator of the event or the occupier of the track. Applications which exceed the statutory 8 day period will be rejected, as will applications made in respect of land which does not constitute a “track” within the definition set out in the Act.

30.2 Track operators and occupiers need to be aware that the procedure for applying for an occasional use notice is different to that for a temporary use notice.

31. **Small Society Lotteries**

31.1 A lottery generally refers to schemes under which prizes are distributed by chance among entrants who have given some form of value for their chance to take part.

31.2 The Act creates two principal classes of lotteries: Licensed lotteries and exempt lotteries. Licensed lotteries are large society lotteries and lotteries run for the benefit of local authorities. These will be regulated by the Gambling Commission. Within the class of exempt lotteries there are four sub classes, one of which is small society lotteries.

31.3 A small society lottery is a lottery promoted on behalf of a non-commercial society as defined in the Act which also meets specific financial requirements set out in the Act. These will be administered by The Council for small societies who have a principal office in Warrington and want to run such lottery.

31.4 A lottery is small if the total value of tickets put on sale in a single lottery is £20,000 or less and the aggregate value of the tickets put on sale in a calendar year is £250,000 or less.

33.5 The Authority will adopt a risk based approach towards its enforcement responsibilities for small society lotteries. We consider that the following list, although not exclusive, could affect the risk status of the operator:

- submission of late returns (returns must be submitted no later than three months after the date on which the lottery draw was held);
- submission of incomplete or incorrect returns;
• breaches of the limits for small society lotteries.

33.6 Non-commercial gaming is permitted if it takes place at a non-commercial event, either as an incidental or principal activity at the event. Events are non-commercial if no part of the proceeds is for private profit or gain. The proceeds of such events may benefit one or more individuals if the activity is organised:

• by, or on behalf of, a charity or for charitable purposes
• to enable participation in, or support of, sporting, athletic or cultural activities.

33.7 Charities and community groups should contact this Authority on **01925 442119** to seek further advice.

33.8 The National Lottery is not licensed by the Gambling Act 2005 and continues to be regulated by the National Lottery Commission under the National Lottery Act 1993.
## PART E

### Appendix 1

**List of Responsible Authorities**

<table>
<thead>
<tr>
<th>Force Licensing Department</th>
<th>The Gambling Commission</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cheshire Constabulary Headquarters</td>
<td>Victoria Square House</td>
</tr>
<tr>
<td>Clemonds Hey</td>
<td>Victoria Square</td>
</tr>
<tr>
<td>Oakmere Road</td>
<td>Birmingham B2 4BP</td>
</tr>
<tr>
<td>Winsford</td>
<td>CW7 2UA</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>H M Revenue &amp; Customs</th>
<th>The Divisional Commander</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Registration Unit (Betting &amp; Gaming)</td>
<td>Cheshire Fire Authority</td>
</tr>
<tr>
<td>Portcullis House</td>
<td>Fire Station</td>
</tr>
<tr>
<td>21 India Street</td>
<td>Winwick Road</td>
</tr>
<tr>
<td>Glasgow, G2 4PZ</td>
<td>Warrington WA2 8HH</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Principal Planning Officer</th>
<th>Environmental Protection Team Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>Warrington Borough Council</td>
<td>Warrington Borough Council</td>
</tr>
<tr>
<td>Environment &amp; Regeneration Directorate</td>
<td>Environment &amp; Regeneration Directorate</td>
</tr>
<tr>
<td>Development &amp; Public Protection Services</td>
<td>Development &amp; Public Protection Services</td>
</tr>
<tr>
<td>New Town House</td>
<td>New Town House</td>
</tr>
<tr>
<td>Buttermarket Street</td>
<td>Buttermarket Street</td>
</tr>
<tr>
<td>Warrington</td>
<td>Warrington, WA1 2NH</td>
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<tr>
<td>WA1 2NH</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Business Compliance Manager</th>
<th>Principal Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health &amp; Health Improvement</td>
<td>Conference &amp; Review Unit</td>
</tr>
<tr>
<td>Warrington Borough Council</td>
<td>Families &amp; Wellbeing Directorate</td>
</tr>
<tr>
<td>Environment &amp; Regeneration Directorate</td>
<td>Warrington Borough Council</td>
</tr>
<tr>
<td>Development &amp; Public Protection Services</td>
<td>Newtown House</td>
</tr>
<tr>
<td>New Town House</td>
<td>Buttermarket Street</td>
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<tr>
<td>Buttermarket Street</td>
<td>Warrington, WA1 2NH</td>
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<td>Warrington</td>
<td>Warrington WA1 2NH</td>
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<tr>
<td>WA1 2NH</td>
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</tr>
</tbody>
</table>
## Appendix 2

### Scheme of Delegation

#### Licensing Authority Scheme of Delegation under the Gambling Act 2005

<table>
<thead>
<tr>
<th>Matter to be dealt with</th>
<th>Full Council</th>
<th>Sub-Committee of Licensing Committee</th>
<th>Officers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Final approval of the Licensing Authority Statement of Policy</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy not to permit Casinos</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fee Setting (when appropriate)</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Application for Premises Licences</td>
<td></td>
<td>Where representations have been received and not withdrawn</td>
<td>Where no representations received/representations have been withdrawn</td>
</tr>
<tr>
<td>Application for a variation to a licence</td>
<td></td>
<td>Where representations have been received and not withdrawn</td>
<td>Where no representations received/representations have been withdrawn</td>
</tr>
<tr>
<td>Application for a transfer of a licence</td>
<td></td>
<td>Where representations have been received from the Commission or responsible authority</td>
<td>Where no representations received from the Commission or responsible authority</td>
</tr>
<tr>
<td>Application for a provisional statement</td>
<td></td>
<td>Where representations have been received and not withdrawn</td>
<td>Where no representations received/representations have been withdrawn</td>
</tr>
<tr>
<td>Review of a premises licence</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Application for club gaming/club machine permits</td>
<td></td>
<td>Where objections have been made and not withdrawn</td>
<td>Where no objections made/objections have been withdrawn</td>
</tr>
<tr>
<td>Cancellation of club gaming/club machine permits</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Applications for other permits</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cancellation of licensed premises gaming machine permits</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consideration of temporary use notice</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Decision to give a counter notice to a temporary use notice</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Premises type</td>
<td>Machine category</td>
<td></td>
<td></td>
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<tr>
<td>------------------------------------------------------------------------------</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Large casino (machine/table ratio of 5-1 up to maximum)</td>
<td>Maximum of 150 machines - Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Small casino (machine/table ratio of 2-1 up to maximum)                      | Maximum of 80 machines  
Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio) |
| Pre-2005 Act casino (no machine/table ratio)                                 | Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead |
| Betting premises and tracks occupied by pool betting                         | Maximum of 4 machines categories B2 to D (except B3A machines) |
| Bingo premises ¹                                                            | Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4  
No limit on category C or D machines |
| Adult gaming centre ²                                                       | Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4  
No limit on category C or D machines |
| Licensed family entertainment centre ³                                       | Maximum of 3 machines in categories B3A or B4 to D  
1 or 2 machines of category C or D automatic upon notification |
| Family entertainment centre (with permit) ³                                 | Number of category C-D machines as specified on permit                                                                                         |
| Clubs or miners’ welfare institute (with permits) ⁴                         | No limit on cat D machines                                                                                                                                 |
| Qualifying alcohol-licensed premises                                         | No limit on category C or D machines                                                                                                                                 |
| Qualifying alcohol-licensed premises (with licensed premises gaming machine permit) | No limit on category C or D machines                                                                                                                                 |
| Travelling fair                                                             | No limit on category C or D machines                                                                                                                                 |
Appendix 4

GAMBLING ACT 2005 CONSULTEES

British Beer & Pub Association
Gamblers Anonymous
Gamcare
The Lotteries Council
The National Bingo Game Association Ltd
Association of British Bookmakers
Casino Operators Association of the UK
Business in Sport and Leisure
BACTA
Advertising Association
Security Industry Authority
Remote Gambling Association
Responsibility in Gambling Trust
TOTE Sport
Ladbrokes Plc
William Hill
Paul Dean Bookmakers Ltd
Betfred
Rev. S Kingsnorth
Working Men’s Club and Institute Union
Society of Independent Brewers
Corbetts Bookmakers

Gamestec Leisure Ltd
Gala Coral Group Ltd
David Pluck (Northwest)
Diamond Bookmakers
Talarius Ltd
Welcome Break
Luxury Leisure
Summit Leisure
Moto Hospitality Ltd
Clover Racing
David Barber
Mrs K Clarke
Gary Simcock
Pagebet
Sceptre
Quattro Leisure
Games Media Ltd
APPENDIX 3

Gambling Local Area Profile

Spatial Analysis Report

Business Intelligence and Change
Introduction and Background

The Gambling Act 2005 gave Local Authorities (LA’s) responsibility for issuing premises licenses for gambling venues. The advice contained within the Act was that LA’s should ‘aim to permit’ premises licenses so long as applications are reasonably consistent with the following objectives;

   a) Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime

   b) Ensuring that gambling is conducted in a fair and open way, and;

   c) Protecting children and other vulnerable persons from being harmed or exploited by gambling

More recently, there have been some changes in the recommended approach to gambling licensing and regulation, as expressed in various documents published by the Gambling Commission (GC, 2015; GC, 2012). These changes can be summarised into three broad themes:

   • Increased focus on risk and regulation
   • Greater attention to local area risk, and;
   • Encouragement of partnership and collaboration between stakeholders to mitigate risk

From April 2016, all industry operators have to undertake local area risk assessments to explore what risks gambling venues pose to the licensing objectives, including the protection of young and vulnerable people.

Aims of the Analysis

Using the work completed by Manchester City Council and the City of Westminster as a reference point, ‘Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index’ and ‘Exploring area based vulnerability to harm: who is vulnerable?’, this report has three main aims;

   • Consider, in the Warrington context, the types of people who may be at greater risk of harm from gambling and where they might be located
   • Using the identified datasets, create a ‘Local Risk Rank’ showing areas with greater concentrations of people who are more likely to be vulnerable to harm.
   • Provide the basis for an intelligence led approach in decision making

Approach

Spatial analysis has been used to examine local variation in vulnerability to gambling-related harm in Warrington. In order to do this we have;
- Identified the main characteristics associated with gambling-related harm using the work completed by Manchester City Council and the City of Westminster identified characteristic.
- For each characteristic, the availability of local level data was reviewed and further datasets were assessed against within the local context.
- Sought to combine this information into a single model that shows areas of greater or lower potential risks.

It is important to note at this stage that the approach taken uses a more probabilistic approach as opposed to a deterministic approach. With this, we are identifying patterns that highlight the potential presence of a range of causal processes (Carter & New, 2004), however, the association itself is not deterministic i.e. ‘x’ causes ‘y’, but more general where ‘x’ may generate ‘y’ outcome under ‘a’, ‘b’, or ‘c’ circumstances (Pawson & Tilly, 1997; Wardle, 2015b).

This approach, as used in the studies by Manchester and Westminster “reflects the uncertainty of subjective experiences whilst recognising there are general patterns” that can be used in risk based models without being able to fully and accurately predict the exact outcomes for each individual. As people and places vary, the potential risk varies, the model developed by Manchester and Westminster, and subsequently adopted here, seeks to identify the spatial variation of risk and to visualise this on a map.

**National Picture**

The Gambling Commission produces an annual report; ‘Gambling participation in 2017: behaviour, awareness and attitudes’. The headline figures from this report were published in February 2018 and show the following:

<table>
<thead>
<tr>
<th>Percentage/Proportion</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>45%</strong></td>
<td>percentage of people who have participated in any form of gambling in the past four weeks</td>
</tr>
<tr>
<td><strong>31%</strong></td>
<td>percentage of people who have participated in gambling in the past four weeks, excluding those who had only played the National Lottery draw</td>
</tr>
<tr>
<td><strong>18%</strong></td>
<td>percentage of people who had gambled online in the past four weeks</td>
</tr>
<tr>
<td><strong>1%</strong></td>
<td>percentage of people who had played on machines in a bookmakers in the past four weeks</td>
</tr>
<tr>
<td><strong>0.8%</strong></td>
<td>Proportion of respondents who were identified as problem gamblers</td>
</tr>
<tr>
<td><strong>3.9%</strong></td>
<td>Proportion of respondents who were identified as low or moderate risk gamblers</td>
</tr>
</tbody>
</table>
The Gambling Commission also produced a report on Young people and gambling, in December 2017. Some of the key findings include:

- 12% of 11-16 year old had spent their own money on gambling in the past week (within seven days prior to completing the survey).
- The most prevalent forms of gambling in the past week are fruit machines (4%), private bets with friends (3%) and National Lottery scratchcards (3%).
- 9% of 11-16 year olds had spent their own money on licenced gambling (where the operator or the premises requires a licence) in the past week.
- On average, young people were 12 years old when they gambled for the first time.
- 80% of young people have seen gambling adverts on TV, 70% on social media and 60% on other websites.
- 10% follow gambling companies on social media.
- 0.9% of 11-16 year olds are classified as ‘problem’ gamblers, 1.3% as ‘at risk’ and 15.5% as non-problem gamblers.
Key Findings for Warrington

Having considered both the national and local picture, and through the analysis of Warrington data sets, the key findings for Warrington show:

- 13 Lower Super Output Areas (LSOAs) were identified as most at risk of gambling related harm.
- Of the 13 identified most at risk, 5 are in the Bewsey and Whitecross ward, 3 are in the Fairfield and Howley ward, with 2 in both Orford and Latchford East and the final area in the Poulton North ward.
- Of the 13 identified most at risk areas, 8 are in the 20% most deprived areas, 3 LSOAs are in the IMD 3rd Decile for deprivation, with the other 2 LSOAs in the 4th Decile for deprivation.
- The top three LSOAs most vulnerable to Gambling Related Harm were in Fairfield and Howley, Bewsey and Whitecross and Orford.
- The most vulnerable LSOA in Fairfield and Howley has a range of services offered within the Town Centre that may draw potentially vulnerable people into the Town Centre.
- Within the ‘Amber’ range of the ranking system, Whittle Hall Heath was identified as having a potentially vulnerable LSOA. The LSOA identified is a 9th decile LSOA. Culcheth, Grazebury and Croft and Whittle Hall both had a potentially vulnerable LSOA within the 8th decile.

Who is vulnerable? Findings from Manchester and Westminster

In their study, Manchester and Westminster conducted research to establish the theoretical and empirical basis for their risk-index models. The two phase approach consisted of stakeholder interviews followed by Quick Scoping Reviews (QSR). The process identified the following themes;

1. Those with constrained social and economic circumstances (those living in deprived areas, those who were unemployed, those with low income, those experiencing social isolation, homeless populations, offenders, migrants etc.)
2. Those with certain demographic characteristics (age, gender, ethnicity – though broadly accepted that these characteristics often serve as a proxy for other mechanisms)
3. Those who may have poor judgement (certain mental health conditions, learning disabilities or low educational attainment, temporary impairment, longer term difficulties due to substance use/ misuse issues etc.)
4. Other groups, such as problem gamblers seeking treatment or those with substance abuse/ misuse issues
The diagram below demonstrates which of the identified characteristics had strong empirical evidence. The characteristics which are shaded in darker grey show where there was good evidence to support that these characteristics are associated with higher risk of harm. Lighter grey demonstrates emerging evidence and the remaining characteristics are mixed/ limited/ no evidence.

Datasets and Data Sources

The datasets used to inform the Warrington spatial analysis are based on the best available local data to represent each of the risk factors identified – some of which have multiple datasets. Some data used may be considered proxy measures where an ideal measure was not available.

Given the profile aims to capture local variation, the model uses data at the smallest geographic scale or unit possible, including Lower Super Output Area (LSOA) and where appropriate, full postal addresses. Where possible, we have used the latest, most up to date data available, however, the age of the data does vary i.e. data derived from the from the national census the data was last collected in 2011.

*Table taken from Manchester/ Westminster Report*
The datasets used are presented in the table below.

<table>
<thead>
<tr>
<th>Datasets</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Demographics:</strong></td>
<td></td>
</tr>
<tr>
<td>• <strong>Black and Minority Ethnic</strong> (BME) (Census 2011)</td>
<td></td>
</tr>
<tr>
<td>• Age (Census 2011, updated mid-term estimates 2016)</td>
<td></td>
</tr>
<tr>
<td>• English language (Census 2011)</td>
<td></td>
</tr>
<tr>
<td>• Lone Parents (Census 2011)</td>
<td></td>
</tr>
<tr>
<td><strong>Licensed Gambling Premises:</strong></td>
<td>Unit postcode/ LSOA of location</td>
</tr>
<tr>
<td><strong>Emerging Adults/Younger Children:</strong></td>
<td></td>
</tr>
<tr>
<td>• Education institutions with students of 13-24 years (unit postcode/ LSOA location)</td>
<td></td>
</tr>
<tr>
<td>• Emerging adults and younger children – number of residents aged 10-24 (LSOA)</td>
<td></td>
</tr>
<tr>
<td><strong>Ethnic Groups:</strong></td>
<td>Number of residents from BME &amp; White Other ethnic groups (Census 2011)</td>
</tr>
<tr>
<td><strong>Problem Gamblers who are seeking treatment:</strong> Gamblers Anonymous meetings and Gamcare counselling locations</td>
<td></td>
</tr>
<tr>
<td><strong>Substance abuse/misuse:</strong> Drug and alcohol treatment and recovery centres/ clinics and clinics within GP surgeries, needle exchanges, accommodation for persons who require treatment for substance misuse</td>
<td></td>
</tr>
<tr>
<td><strong>Financial Difficulties:</strong></td>
<td></td>
</tr>
<tr>
<td>• Payday loan shops (unit postcode/ LSOA of location)</td>
<td></td>
</tr>
<tr>
<td>• Food banks (unit postcode of location)</td>
<td></td>
</tr>
<tr>
<td><strong>Economically Active:</strong></td>
<td></td>
</tr>
<tr>
<td>• Job Centre Plus Offices (unit postcode/ LSOA of location)</td>
<td></td>
</tr>
<tr>
<td>• Residents in receipt of any out-of-work benefit (NOMIS, 2015)</td>
<td></td>
</tr>
<tr>
<td><strong>Homelessness:</strong></td>
<td>Emergency, Second Stage, Specialist and Universal Provision</td>
</tr>
<tr>
<td><strong>Community Centres:</strong></td>
<td>Community Centre location</td>
</tr>
</tbody>
</table>

**Caveats/ Data Limitations**

The profiles are based on current knowledge and available data. There are a number of potential groups (such as immigrants) who we have very limited data on and therefore were not included in the current profiles. The Census information is from 2011 and therefore caution is required as this data might not be wholly representative of the current situation in Warrington.
How has the Data been used?

The datasets have been used to identify vulnerable persons and/or groups/location in Warrington based on the identified themes;

- **People vulnerable to gambling-related harm**: Spatial analysis of Warrington by themes; Demographics (including Acorn data profiling); Socio-economic; Poor Judgement/Impairment;

- **Cumulative Impact**: The impact on people/communities resulting from the accumulation of successive additions of poorly performing measures across all themes

- **Anomalies outside analysis perimeters**: Following spatial analysis and cumulative impact, further analysis was completed to identify any issues or data variances that seem inconsistent with the overall context that might warrant further investigation

- **Emerging Areas**: Not all data was available at a Warrington level, that was used in the original project in Manchester and Westminster. As data become more readily available, further areas and their potential risk can be further explored

The methodology used to create a meaningful scoring index was a ranking system. Each of the measures received a ranked score of between 1 and 127 (there are 127 LSOAs), the data in the LSOA for each measure, that could mean most at risk/vulnerable, received the highest ranked score of 127, and this continued until the least at risk/vulnerable scored 1. These ranking scores were applied to each of the measures and averaged out to provide an overall rank of most at risk/vulnerable. Other (non-measure) measure were also added in these scores to provide an additional weighting.

Results

It is important to note that the maps in the subsequent sections of this report show the risk of gambling related harm at a given location. **They do not show where problem gambling is occurring.** As previously discussed, the model used is a probabilistic measure of risk to gambling harm vulnerability among the Warrington population. In essence, the areas ranked as ‘red’ are the locations at the greatest risk of experiencing harms associated with gambling.

The risk ranking has a total score of 0-127 where Warrington has 127 LSOAs. For the purpose of this report 127 is the most at risk location;

<table>
<thead>
<tr>
<th>Average Rank 1-101</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Average Rank 102-115 (20%)</td>
<td></td>
</tr>
<tr>
<td>Average Rank 116-127 (Bottom 10%)</td>
<td></td>
</tr>
</tbody>
</table>

For the measures sourced from Census data, NOMIS, Police and IMD and relative measure of ranking was used where the performance of one LSOA was in relation to the performance of the rest of the LSOAs in the Borough. For the facilities locational data sets, a standard weighting system was
employed where a score for the presence of a specific facility was given, adding to the total score for the LSOA. The higher the score, the greater the risk.
### Highest Ranked LSOAs by Measures

<table>
<thead>
<tr>
<th>Ward and LSOA Code</th>
<th>Average (median) age of residents in years</th>
<th>Aged 10 to 17</th>
<th>Aged 18 to 24</th>
<th>Lone Parent households with one or more dependent children</th>
<th>People aged 3+ whose main language is not English</th>
<th>Number of residents from BME &amp; EU White Other ethnic groups</th>
<th>Overall level of deprivation - IMD score</th>
<th>National [England] decile</th>
<th>Residents in receipt of Universal Credit</th>
<th>Number of reported Crime and ASB incidents</th>
<th>Average Rank</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fairfield and Howley - E01033299</td>
<td>29</td>
<td>195</td>
<td>236</td>
<td>122</td>
<td>225</td>
<td>472</td>
<td>24.8</td>
<td>4</td>
<td>232</td>
<td>237</td>
<td>127</td>
</tr>
<tr>
<td>Bewsey and Whitecross - E01012455</td>
<td>30</td>
<td>219</td>
<td>201</td>
<td>139</td>
<td>179</td>
<td>394</td>
<td>56.9</td>
<td>1</td>
<td>222</td>
<td>341</td>
<td>126</td>
</tr>
<tr>
<td>Orford - E01012520</td>
<td>34</td>
<td>155</td>
<td>146</td>
<td>84</td>
<td>59</td>
<td>164</td>
<td>56.1</td>
<td>1</td>
<td>121</td>
<td>322</td>
<td>125</td>
</tr>
<tr>
<td>Latchford East - E01012507</td>
<td>36</td>
<td>127</td>
<td>211</td>
<td>84</td>
<td>80</td>
<td>217</td>
<td>33.8</td>
<td>3</td>
<td>138</td>
<td>276</td>
<td>124</td>
</tr>
<tr>
<td>Orford - E01012526</td>
<td>32</td>
<td>216</td>
<td>207</td>
<td>137</td>
<td>119</td>
<td>253</td>
<td>59.2</td>
<td>1</td>
<td>181</td>
<td>192</td>
<td>123</td>
</tr>
<tr>
<td>Bewsey and Whitecross - E01012454</td>
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<td>219</td>
<td>230</td>
<td>90</td>
<td>179</td>
<td>520</td>
<td>28.9</td>
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<td>198</td>
<td>327</td>
<td>122</td>
</tr>
<tr>
<td>Bewsey and Whitecross - E01012458</td>
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<td>231</td>
<td>212</td>
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<td>122</td>
<td>327</td>
<td>27.1</td>
<td>3</td>
<td>143</td>
<td>204</td>
<td>121</td>
</tr>
<tr>
<td>Poulton North - E01012545</td>
<td>34</td>
<td>186</td>
<td>133</td>
<td>134</td>
<td>47</td>
<td>200</td>
<td>48.5</td>
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<td>147</td>
<td>228</td>
<td>120</td>
</tr>
<tr>
<td>Fairfield and Howley - E01012480</td>
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<td>124</td>
<td>164</td>
<td>59</td>
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<td>560</td>
<td>45.8</td>
<td>1</td>
<td>229</td>
<td>484</td>
<td>119</td>
</tr>
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<td>Bewsey and Whitecross - E01012453</td>
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<td>124</td>
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<td>186</td>
<td>54.5</td>
<td>24.6</td>
<td>4</td>
<td>163</td>
<td>171</td>
<td>117</td>
</tr>
<tr>
<td>Latchford East - E01012504</td>
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<td>232</td>
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<td>4</td>
<td>163</td>
<td>171</td>
<td>117</td>
</tr>
<tr>
<td>Fairfield and Howley - E01012483</td>
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<td>130</td>
<td>156</td>
<td>104</td>
<td>94</td>
<td>284</td>
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<td>1</td>
<td>189</td>
<td>217</td>
<td>116</td>
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<tr>
<td>Bewsey and Whitecross - E01083802</td>
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<td>35.6</td>
<td>2</td>
<td>114</td>
<td>403</td>
<td>115</td>
</tr>
</tbody>
</table>
### Amber Ranked LSOAs by Measures

<table>
<thead>
<tr>
<th>Ward and LSOA Code</th>
<th>Average (median) age of residents in years</th>
<th>Aged 10 to 17</th>
<th>Aged 18 to 24</th>
<th>Lone Parent households with one or more dependent children</th>
<th>People aged 3+ whose main language is not English</th>
<th>Number of residents from Black &amp; White Other ethnic groups</th>
<th>Overall level of deprivation - IMD score</th>
<th>National (England) decile</th>
<th>Residents in receipt of Universal Credit</th>
<th>Number of reported Crime and ASB incidents</th>
<th>Average Rank</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bewsey and Whitecross - E01012457</td>
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<td>120</td>
<td>150</td>
<td>82</td>
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<td>618</td>
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<td>280</td>
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</tr>
<tr>
<td>Poplars and Hulme - E01012533</td>
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<td>211</td>
<td>141</td>
<td>117</td>
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<td>171</td>
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<td>185</td>
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<td>66</td>
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<td>112</td>
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<td>1.0</td>
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<td>153</td>
<td>109</td>
</tr>
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<td>Birchwood - E01012466</td>
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<td>146</td>
<td>100</td>
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<td>212</td>
<td>41.4</td>
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<td>108</td>
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<td>283</td>
<td>72</td>
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<td>502</td>
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<td>1.0</td>
<td>151</td>
<td>134</td>
<td>106</td>
</tr>
<tr>
<td>Poplars and Hulme - E01012534</td>
<td>32</td>
<td>143</td>
<td>155</td>
<td>102</td>
<td>27</td>
<td>111</td>
<td>41.7</td>
<td>2.0</td>
<td>146</td>
<td>213</td>
<td>105</td>
</tr>
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<td>Poplars and Hulme - E01012535</td>
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<td>193</td>
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<td>38.4</td>
<td>2.0</td>
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<td>148</td>
<td>104</td>
</tr>
<tr>
<td>Culcheth, Glazebury and Croft - E01012471</td>
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<td>136</td>
<td>266</td>
<td>27</td>
<td>102</td>
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<td>12</td>
<td>144</td>
<td>103</td>
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<td>9.5</td>
<td>8.0</td>
<td>75</td>
<td>103</td>
<td>102</td>
</tr>
</tbody>
</table>
**Warrington Demographics**

The following maps have been produced with updated information relating to the new ward boundaries and the locations of licenced gambling premises. Some of the maps relate to information from the Census and Indices of Multiple Deprivation, the data behind these maps hasn’t been updated.

**Indices of Multiple Deprivation 2015 (IMD)**
Ethnicity not British

This map contains Census data, the only updated information relates to the new ward boundaries and the licensed gambling premises.
English not first language

This map contains Census data, the only updated information relates to the new ward boundaries and the licensed gambling premises.
Emerging Adults: Population aged between 10 and 24

This map has updated information from the population estimates (Mid 2016) from the Office for National Statistics, the boundaries and licenses premises.
Lone Parents

This map contains Census data, the only updated information relates to the new ward boundaries and the licensed gambling premises.
Themed Map Analysis: Socio-Economic

**Employment:** Residents in receipt of any out-of-work benefits

This map has updated data relating to Universal Credit rather than out of work benefits, updated ward boundaries and licensed gambling premises.
**Homeless: Licensed Gambling premises and Homeless support services**

This map has updated homeless support services, ward boundaries and licensed gambling premises.
**Financial Difficulties/Debt:** Licensed Gambling premises and foodbanks and payday loan shops

This map has updated information on food bank services, payday loan services, ward boundaries and licensed gambling premises.
Themed Map Analysis: Poor Judgement/ Impairment

**Problem Gamblers:** Licensed Gambling premises and Gambling support services

This map has updated gambling support services, ward boundaries and licensed gambling premises.
**Alcohol/ Drugs issues:** Licensed Gambling premises and Alcohol/ Drug support services

This map has updated information on drug and alcohol support services, ward boundaries and licensed gambling premises.