

LICENSING COMMITTEE: 6th October 2009

Report of the Chief Strategic Planning and Environment Officer

REVIEW OF STATEMENT OF GAMBLING LICENSING POLICY

1. Background

- 1.1 Under the Gambling Act 2005 every Licensing Authority has to publish a Statement of Licensing Policy which sets out the principles that it proposes to apply in exercising its functions under the Act. The statement must be determined for a three year period in consultation with:
- 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
- 1.2 A Statement of Gambling Licensing Policy was adopted and published in January 2007. The Gambling Commission has provided guidance to local authorities on what Statements of gambling licensing policies should contain and this has been relied upon in reviewing the existing policy statement.
- 1.3 This report is to request the approval of the Committee of an amended Statement of Gambling Licensing Policy following a review of the policy. A copy of the amended Statement of Gambling Licensing Policy is attached as Appendix A.

2. Preparation of the Amended Licensing Policy Statement

- 2.1 Section 349 of the Gambling Act requires a licensing authority to prepare before each successive period of three years, a statement of the principles that they propose to apply in exercising their functions under the Act during that period. This Section of the Act was brought into force by the Gambling Act 2005 (Commencement No. 3) Order 2006 on 31 March 2006. The authority adopted a SGLP and published it by the deadline date of 31 January 2007.
- 2.2 Under Section 154 of the Act the licensing authority must approve the policy and may not delegate this to its Licensing Committee.
- 2.3 The Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006 came into force on 31 March 2006 and set out the requirements on licensing authorities as to the form and publication of the Statement of Gambling Licensing Policy.

- 2.4 Section 25 of the Act requires the Gambling Commission to produce guidance to local authorities on the manner in which they are to exercise their functions under the Act. Licensing Authorities must have regard to this guidance which was last published by the Gambling Commission in May 2009. The guidance has been relied upon extensively in reviewing its Statement of Gambling Licensing Policy.
- 2.5 The following draft timetable has been adopted in order to achieve publication of the amended policy by January 2010.

07/05/2009	All licence holders written to and invited to contribute to the review of the policy.
07/05/2009	All responsible authorities notified of review.
07/05/2009	Direct Consultation with stakeholders and local faith groups.
01/06/2009	Press Notice published and Press Release issued.
05/06/2009	Consultation Notice placed on Licensing Website Homepage
01/06/2009 to 28/08/2009	Public Consultation on Gambling Policy Statement
06/10/2009	Report on GPS for Licensing Committee Approval
22/10/2009	Report to Council for approval of GPS
16/11/2009	Advertisement of Intention to Publish Revision.
01/01/2010	Publish the amended Statement of Gambling Policy
31/01/2010	Revised Statement of Gambling Policy to have effect.

- 2.6 Each of the responsible authorities and those stakeholders and organisation which have expressed an interest have been consulted directly on the policy as have all those who hold a licence. A public consultation exercise was carried out requesting views on the existing policy. The policy has been amended as a result. Details of the representations received are shown in Appendix B to the report.

3. **Achievability**

This report contains no equality, personnel or property implications. Implementation of the legislation, if approved, will have personnel and financial implications which will need to be considered at that time.

4. **Legal Implications**

- 4.1 The Gambling Act 2005 places a statutory requirement on licensing authorities to issue a Statement of Gambling Licensing Policy. The full Council is required to approve the Policy for publication.

5. **Financial Implications**

- 5.1 This report does not result directly in any additional financial implications. The cost of providing the licensing service is met from income from licence fees and charges which are reviewed annually to ensure the service continues to be provided at no cost to the authority.

6. Recommendation

It is recommended that the Committee endorse the amended Statement of Gambling Licensing Policy and approve it for ratification by the Council.

Sean Hannaby
Chief Strategic Planning and Environment Officer

4 September 2009

This report has been prepared in accordance with procedures approved by Corporate Managers.

Background Papers:

1. The Gambling Act 2005 and associated Regulations.
2. Gambling Commission Guidance to Local Authorities.



CARDIFF COUNCIL

GAMBLING ACT 2005

**STATEMENT OF GAMBLING
LICENSING POLICY**

January 2010



CONTENTS

	Page
STATEMENT OF LICENSING POLICY	
1. Introduction	2
2. Purpose and Scope of the Licensing Policy	3
3. Licensing Objectives	4
4. Responsible Authorities and Interested Parties	4
5. Decision Making	6
6. Enforcement and Premises Inspection	8
7. Information Exchange	9
8. Casino Premises	10
9. Gambling Permits	11
APPENDIX A - List of Organisations Consulted Directly.	12
APPENDIX B - Responsible Authorities : Contact Details	13

STATEMENT OF GAMBLING LICENSING POLICY

1. **Introduction.**

Under the Gambling Act 2005 every Licensing Authority has to publish a Statement of Licensing Policy which sets out the principles that it proposes to apply in exercising its functions under the Act. Accordingly this Statement has been prepared by Cardiff Council in accordance with the provisions of the Gambling Act 2005 and its Regulations. The Statement covers the geographical area of the City and County of Cardiff.

The Gambling Act 2005 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

As part of the development of this Statement various partners were engaged in consultation and their views have been taken into account. In particular the consultation partners have included:

- South Wales Police
- South Wales Fire Authority
- Cardiff Community Safety Partnership
- Cardiff Council Pollution Control Section
- Cardiff Council Health and Safety Section
- Cardiff Council Children's Services
- Cardiff residents
- Trade organisations
- Charitable organisations
- Faith Groups
- Her Majesty's Commissioners for Customs and Excise
- The Gambling Commission

In preparing this Statement of Gambling Licensing Policy the authority declares that it has had regard to the legislation, licensing objectives of the Gambling Act 2005, the guidance issued by the Gambling Commission and any relevant codes of practice and the comments received from all those it has consulted. This policy Statement will be monitored constantly and will be formally reviewed every three years.

2. **Purpose and Scope of the Statement of Gambling Licensing Policy.**

2.1 'Gambling' is defined in the Act as either gaming, betting or taking part in a lottery:

- ‘gaming’ means playing a game of chance for a prize
- ‘betting’ means making or accepting a bet on the outcome of a race, competition, or any other event; the likelihood of anything occurring or not occurring; or whether anything is true or not true
- a ‘lottery’ is where persons are required to pay in order to take part in an arrangement, during the course of which one or more prizes are allocated by a process which relies wholly on chance.

2.2 The scope of the policy Statement is to cover all matters in respect of which the licensing authority has duties under the Gambling Act 2005. Licensing Authorities are required under the Act to:

- Publish and Review a Statement of Licensing Policy
- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences in respect of Casino premises, Bingo Halls, Betting premises including Tracks, Adult Entertainment Centres and Family Entertainment Centres
- Issue Provisional Statements
- Regulate members’ clubs and miners’ welfare institutes which 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) of the use of two or fewer gaming machines
- Grant Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where more than two machines are required
- 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
- Maintain registers of the permits and licences that are issued under these functions

It should be noted that local licensing authorities will not be involved in licensing remote gambling at all. This will fall to the Gambling Commission via Operator Licences.

3. The Licensing Objectives.

3.1 The licensing authority will regulate gambling in the public interest and when carrying out its functions and exercising its powers will aim to promote the licensing objectives at all times. All applications will be dealt with on their

individual merits in the application of the licensing objectives. The authority will not seek to use the Gambling Act to resolve matters which are controlled by other legislation. Nothing in this Statement of Gambling Licensing Policy will override the right of any person to make an application under the Gambling Act 2005 or to make a representation in accordance with the legislation and to have the application or representation considered on its merits, subject to the licensing objectives.

3.2 The licensing objectives are:

- To prevent gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime;
- To ensure that gambling is conducted in a fair and open way; and
- To protect children and other vulnerable persons from being harmed or exploited by gambling.

3.3 The licensing objectives are the only matters the Authority will consider in determining an application.

4. Responsible Authorities and Interested Parties.

4.1 Where an application is made to the licensing authority for a Gambling Premises Licence, a responsible authority or interested party may make representations about the application to the Authority. Section 157 of the Act identifies the bodies that are to be treated as responsible authorities. They are:

- (a) a licensing authority in England and Wales in whose area the premises is wholly/partly situated;
- (b) the Gambling Commission;
- (c) the chief officer of police/chief constable for the area in which the premises is wholly or partially situated;
- (d) the fire and rescue authority for the same area;
- (e) the local planning authority;
- (f) an authority which has functions in relation to pollution to the environment or harm to human health;
- (g) anybody, designated in writing by the licensing authority as competent to advise about the protection of children from harm;
- (h) HM Revenue & Customs; and
- (i) any other person prescribed in regulations by the Secretary of State.

In relation to a vessel, but no other premises, responsible authorities also include navigation authorities within the meaning of section 221(1) of the Water Resources Act 1991 that have statutory functions in relation to the waters where the vessel is usually moored or berthed or any waters where it is proposed to be navigated at a time when it is used for licensable activities. This would include:

- (a) the Environment Agency;
- (b) the British Waterways Board; and

- (c) the Secretary of State. (Note: in practice, the Secretary of State for Transport who acts through the Maritime and Coastguard Agency.)

4.2 The licensing authority is required by regulations to state the principles it will apply in exercising its 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
- the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group etc

In carrying out its duty to protect children the Licensing Authority has determined that the responsible authority for the protection of children is Cardiff Council Children's Services.

4.3 Interested parties can make representations about licence applications, or apply for a review of an existing licence. These parties are defined in the Gambling Act 2005 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 Gambling 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)”

4.4 In exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party this Authority will not apply a rigid rule to its decision making and each case will be decided upon the evidence as to the likelihood that the party live sufficiently close to the premises as to be affected by the authorised activities. The matter will be decided upon its merits depending upon the evidence of:

- the size of the premises
- the nature of the premises
- the potential impact of the premises on the area
- the type of facilities applied for
- the geographical location of the premises
- the nature of the area in which the premises are situated
- any other reasonable factor

4.5 Interested parties would generally include trade associations and trade unions, and residents' and tenants' associations where these organisations are able to

demonstrate that they are representing members who live sufficiently close to the premises and who are likely to be affected by the activities being applied for.

- 4.6 Interested parties can be persons who are democratically elected such as Councillors and AM's. Other than these persons, this authority will require written evidence that a person 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation, is sufficient. 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.

5. Decision Making

- 5.1 This Licensing Authority will strive to make all decisions required in a manner consistent with the Gambling Act 2005, the Guidance issued by the Gambling Commission, relevant codes of practice and this Statement of Licensing Policy.

- 5.2 In processing applications the overriding principle adopted by the council will be that each application will be determined on the merits of the individual Gambling Premises Licence application, subject to the sources of authority mentioned in paragraph 5.1. The licensing objectives will be the governing factor in any decision taken and applicants will be expected to address issues of concern such as:

- the proximity of schools and vulnerable adult centres
- the nature and type of premises
- the nature and type of area
- any problems of organised crime, or incidence of violent disorder in the area
- the concentration of families with children in the area
- ensuring that premises are not advertised in a way which may make them particularly attractive to children
- any necessary segregation of areas within the premises
- supervision of entry and access to the premises
- any other reasonable matter for concern.

- 5.3 Conditions on Gambling Premises Licences will relate only to gambling, as considered appropriate in the light of the principles to be applied under section 153 of the Gambling Act. In considering any necessary and proportionate conditions to be attached to licences the Authority will take into account factors which are:

- relevant to the need to make the proposed building suitable as a gambling facility;
- relevant with consideration to any age restrictions applicable to the premises

- directly related to the premises and the type of licence applied for;
- relevant in respect of the nature of the area in which the premises are situated;
- fairly and reasonably related to the scale and type of premises; and
- reasonable in all other respects.

Decisions on individual conditions will be made on a case by case basis, although there will be a number of control measures available and the authority will expect the licence applicant to suggest any necessary conditions to meet the licensing objectives. Examples of appropriate conditions which may be attached to the licence in the interests of meeting the licensing objectives where it is considered that they are both necessary and proportionate are:

- Proof of age schemes
- CCTV systems
- Door Supervisors
- Physical separation of areas
- Location of entry
- Notices and signage
- Specific opening hours
- The location of gaming machines
- Self exclusion policies
- Provision of leaflets and gambling addiction advice
- Provision of helpline numbers
- Gamcare Certification

This list is not mandatory or exhaustive, and is merely indicative of example measures.

There are conditions which the licensing authority cannot attach to Gambling 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

It should be noted that, unlike the Licensing Act, the Gambling Act specifically does not include as a specific licensing objective the prevention of public nuisance. Any nuisance associated with gambling premises should therefore be tackled under other relevant laws.

- 5.4 The ‘need’ or demand for gambling facilities at a licensed premises or where they should be located in general are not matters that the licensing authority will consider when discharging its decision making function.
- 5.5 The authority will take no account of any representations which are irrelevant to the application being considered. The following examples of possible

representations would not be likely to be relevant although the list is by no means exhaustive, and each case will be decided on the facts:

- that there are already too many gambling premises in the locality (although it may be relevant if it points, as a result, to rising problems in crime, disorder, underage gambling or problem gambling);
- that the proposed premises are likely to be a fire risk;
- that the location of the premises is likely to lead to traffic congestion; or
- that the premises will cause crowds of people to congregate in one area, which will be noisy and a nuisance.

Similarly the authority will not consider any representation it receives which a 'frivolous' or 'vexatious' representation. Although this will be a question of fact depending upon the case factors which will be taken into account in determining the matter will include:

- who is making the representation, and whether there is a history of making representations that are not relevant;
- whether it raises a 'relevant' issue; or
- whether it raises issues specifically to do with the premises that are the subject of the application.

5.6 In determining applications the Licensing Committee will delegate its functions to Licensing Sub Committee(s) and appropriate officers in the interests of speed, efficiency and cost effectiveness. The procedure and practices of the Sub-Committees will be clearly laid down and made available to applicants and those making representations.

5.7 Applications for review will normally be accepted and processed without delay provided that the application is relevant to the licensing principles and that the grounds for review are not frivolous or vexatious, trivial or repetitive.

5.8 In determining applications for permits of all types a general principle applied will be that given that the premises will particularly appeal to children and young persons, the applicant will in particular be expected to demonstrate their suitability in terms of the child protection issues.

6. Enforcement and Premises Inspection.

6.1 Licensing authorities are required by regulation under the Gambling Act 2005 to state the principles to be applied by the authority 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.

6.2 In taking enforcement action of any kind the Authority has adopted the principles of better regulation and will act in accordance with its published Enforcement Policy Statement and will endeavour to 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 joined up and implemented fairly;
- Transparent: regulators should be open, and keep regulations simple and user friendly; and
- Targeted: regulation should be focused on the problem, and minimise side effects

6.3 As per the Gambling Commission's Guidance for local authorities this licensing authority will endeavour to avoid duplication with other regulatory regimes so far as possible and will adopt a risk-based inspection programme based on the licensing objectives to ensure that resources are targeted at problem premises. In determining the level of risk the authority will be concerned with:

- the nature and type of area in which the premises are situated
- evidence of crime or disorder at the premises
- the nature, size and type of premises
- the facilities for gambling being offered
- the length of time the premises has been operating
- the history of complaints received
- the level of concern expressed by responsible authorities and interested parties
- any other reasonable matter for concern.

6.4 The main enforcement and compliance role for this licensing authority in terms of the Gambling Act 2005 will be to ensure compliance with the Gambling Premises Licences and other permissions which it authorises in the public interest. The Gambling Commission will be the enforcement body for the Operator and Personal Licences. It is also worth noting that concerns about manufacture, supply or repair of gaming machines will not be dealt with by the licensing authority but will be notified to the Gambling Commission. This authority also understands that the Gambling Commission will be responsible for compliance as regards unlicensed premises.

7. Information Exchange.

7.1 Licensing authorities are required to include in their policy Statement 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 it and the Gambling Commission, and the functions under section 350 of the Act with the respect to the exchange of information between it and the other persons listed in Schedule 6 to the Act.

7.2 The principle that this licensing authority applies is that it will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information

which includes the provision that the Data Protection Act 1998 will not be contravened. However, the authority is under a duty to protect the public funds it administers, and to this end may use the information you have provided in making an application for the prevention and detection of fraud. It may also share this information with other bodies responsible for auditing or administering public funds for these purposes. The licensing authority will also have regard to any Guidance issued by the Gambling Commission to Local Authorities on this matter when it is published, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

- 7.3 The authority may from time to time exercise its' powers under section 115 of the Crime and Disorder Act 1998 to exchange data and information with the police and other partners to fulfil its' statutory objective of reducing crime in the area.
- 7.4 The authority would wish to make its decision making process as transparent as possible and all representations made to it will be shared with all parties to an application. Freedom of information legislation will be complied with.

8. Casino Premises.

- 8.1 Under the provisions of Section 166 of the Gambling Act 2005 an authority may resolve not to issue casino premises licences. The Authority has made no such resolution. The Licensing Committee will consider any petition signed by no less than 50 persons requesting that such a resolution should be made and make a recommendation on the proposal to the full Council for consideration and determination.

9. Gambling Permits.

- 9.1 In addition to the grant of gambling premises licences the authority also has responsibility for issuing a range of permits as detailed in section 2.2 of the Statement.
- 9.2 In respect of the issue of prize gaming permits the authority intends to restrict the grant or renewal of such permits to cafes and restaurants or hotels with restaurant facilities where seating facilities are provided for persons to take refreshment of food on the premises and the number of machines to be limited to one in each premises unless the premises is a staff canteen when two machines may be permitted.
- 9.3 The authority will deal with each application in respect of a Family Entertainment Centre entirely on its merits and will expect an applicant to be able to demonstrate that they are a fit and proper person and entirely suitable for a permit.

APPENDIX A - List of Organisations Consulted Directly.

South Wales Fire Service
HM Commissioners of Customs and Excise
Gambling Commission
Magistrates Licensing Section
Cardiff City Centre Manager
Cardiff Community Safety Partnership
Roger Etchells, Chartered Surveyor
Morgan Cole, Solicitors
GamCare
Gordon House Association
Gamblers Anonymous
British Amusement Catering Trades Association
Bingo Association of Great Britain
Casino Operators' Association
The British Casino Association
Association of British Bookmakers
British Greyhound Racing Board
Mecca Bingo Clubs
Ladbrokes Betting and Gaming Limited
William Hill plc
Business in Sport and Leisure
British Beer and Pub Association
Cardiff Council's Children's Services
Health and Safety Section Cardiff Council
Pollution Control Section Cardiff Council
Cardiff Planning Authority
Cardiff Council's Consumer Protection Section
Roman Catholic Archbishop of Cardiff
Archbishop of Wales
Sikh Centre, South Glamorgan
Cardiff Methodist Church
Greek Orthodox Church Cardiff
Cardiff United Synagogue
Muslim Council of Wales

APPENDIX B - Responsible Authorities : Contact Details

Consultation with all Responsible Authorities is encouraged prior to the submission of the application. Where copies of applications have to be submitted to the Chief Officer of Police and/or the Responsible Authorities dependant on licence application type the following addresses should to be used:

<p>The Operational Manager (Licensing) Licensing and Strategic Services Strategic Planning & Environment Cardiff Council City Hall Cardiff CF10 3ND 029 20871651</p>	<p>The Chief Officer of Police Licensing Section, South Wales Police Central Police Station King Edward VII Avenue Cathays Cardiff CF10 3NN 029 20222111</p>
<p>The Gambling Commission Victoria Square House Victoria Square, Birmingham. B2 4BP 0121 230 6500</p>	<p>The Chief Fire Officer South Wales Fire and Rescue Service Forest View Business Park, Llantrisant, Pontyclun CF72 8LX 01443 232000</p>
<p>The Operational Manager (Environment) Pollution Control Strategic Planning & Environment Cardiff Council City Hall, Cardiff. CF10 3ND 029 20871856 or 20871675</p>	<p>The Operational Manager (Development & Building Control) Development and Building Control Strategic Planning & Environment Cardiff Council City Hall, Cardiff. CF10 3ND 029 20871135</p>
<p>The Operational Manager Children's Services Child Protection Unit Trowbridge Family Centre Greenway Road Trowbridge Cardiff CF3 1QS 029 20774642</p>	<p>Her Majesty's Commissioners of Customs and Excise, Government Buildings Ty Glas Llanishen Cardiff. CF14 5FP 029 2032 5003</p>
<p>The Operational Manager (Public Protection) Public Protection (Health and Safety) Strategic Planning & Environment Cardiff Council City Hall, Cardiff. CF10 3ND 029 20871124 (Premises where health & safety is enforced by Cardiff County Council)</p>	<p>The Operational Manager for Wales Health and Safety Executive Government Buildings Ty Glas, Llanishen Cardiff. CF14 5SH 029 20263000 (Premises where health & safety is enforced by HSE)</p>

APPENDIX B - Details of Representations Received on the Statement of Licensing Policy.

Date	Source.	Details of Representation.	Response.	Details of Amendment
01/05/2009	Fire and Rescue Service	Change of address of Headquarters	Noted	Responsible authority address changed.
01/05/2009	Licensing Authority	Incorrect reference in Section 9.1 to the list of permits in 2.1 should read 2.2	Noted	Document Amended.
01/05/2009	Licensing Authority	Section 8.2 was in connection with the grant of a new Casino Licence in Cardiff which is not to take place.	Noted	Section 8.2 deleted.
20/05/2009	Gamcare	Request consideration of including Gamcare certification as an appropriate control measure for premises to demonstrate awareness of their responsibilities.	Noted	Section 5.3 amended to include Gamcare Certification as a possible control measure.
27/05/2009	South Wales Fire and Rescue Service	The Fire Authority advised that it did not wish to make representations.	Noted	No change necessary.
29/05/2009	The Methodist Church – Cardiff Circuit	<p>The churches call for action to prohibit children from gambling and asks if Children’s services are consulting appropriately.</p> <p>Asks what research has been carried out to ascertain if children are being protected.</p> <p>Would like to know what steps are being taken to monitor the prevalence of problem gambling in Cardiff, what measures have been taken to identify if children are being allowed to gamble and what kind of education programme in schools will help alert children to the dangers of problem gambling.</p>	<p>Children’s Services were appointed by the authority as the responsible body for children and vulnerable persons.</p> <p>The authority does not undertake research into gambling or provide educational material, this is carried out by the Gambling Commission and other expert agencies.</p>	No change required.
01/08/2009	Gambling Commission Guidance.	Section 5.2 of the Commissions Guidance makes it clear that licensing authorities are expected to comply with the better regulation agenda in accordance with the	The enforcement principles adopted by the council should be clarified in the Statement	Section 6.2 of the Statement expanded to make it clear that the authority has adopted the

		Regulators Compliance Code.	of Gambling Licensing Principles.	principles of better regulation.
01/08/2009	Gambling Commission Guidance.	Section 6.28 requires licensing authorities to set out how it will approach information exchange.	The authority works with other public bodies to combat fraud by exchanging information and this should be made clear in the statement of policy.	Section 7.2 of the Statement expanded to cover the exchange of information in the interests of the prevention of fraud.