

Question	Issue	Proposed Condition	Response
<p>'Do you agree with the maximum and minimum limits proposed for automated table games?'</p>	<p>Casinos – seeks to regulate automated table games such as roulette by imposing a maximum number of player positions. Necessary due to lack of human intervention which would otherwise spot problem gambling and as the games are played much quicker</p>	<p>A maximum of 40 player positions at wholly automated versions of real games of chance, 'automated table games', in any casino. A minimum of four player positions for any individual automated table game.</p>	<p>No comment as beyond our expertise but noted that the Licensing Authority would have monitoring role for compliance with the condition</p>
<p>'Do you agree with the decision not to regulate on the provision of recreational facilities?'</p>	<p>The Act allows regulations to be made requiring certain casinos to provide non-gambling related recreational facilities</p>	<p>The Government has decided not to impose conditions but to leave it to the discretion of the Licensing Authority</p>	<p>Yes</p>
<p>'Do you agree with the revised proposals on ATM's address the concerns about compliance and enforcement?'</p>	<p>Under current guidelines for casinos and bingo halls ATM's have to be positioned so that a customer has to leave a gaming table or machine to use them. They are seen as important safeguard in providing a cooling off period before being tempted to gamble more money. These requirements are to replicate and extended to AGCs, FECs and betting shops</p>	<p>Mandatory condition -ATMs must be positioned so that customers must cease to gamble at tables or gaming machines in order to use them</p>	<p>Yes</p>
<p>'Do you agree with the proposal not to attach mandatory or default conditions in relation to door</p>	<p>The Act allows for regulations to be made on door supervision, which could ensure appropriate measures are in place to prevent access by children and other unauthorised persons</p>	<p>No conditions proposed as operators will already be bound by codes of practice and the legislation and it will be in their own interests to ensure</p>	<p>Yes</p>

supervisors?’	Operators will be required to abide by the Commissions Codes of Practice and the legislation which will include such restrictions. LA will in individual circumstances impose such conditions	compliance	
‘Do you agree that the limit of 40 bet receipt terminals in new casinos is appropriate?’	Betting will be permitted in certain casinos for the first time. In order to ensure that betting does not predominate, it is proposed to impose a maximum number of terminals for the taking of bets.	A maximum of 40 bet receipt terminals permitted in casinos	Yes
‘Do you agree that a mandatory condition is required specifying supervision of bet receipt terminals on tracks?’	It is not felt to necessary in relation to betting offices or tracks as their primary purpose is to provide betting, but it is felt appropriate for terminals to be supervised on tracks where children are present	.Bet receipt terminals must be supervised on tracks.	Yes
‘Do you agree with the proposed gambling hours for casinos, betting offices, tracks and bingo?’	It is felt that the safeguards introduced by the Act enable premises to adopt longer house and a more flexible approach. Default conditions are suggested from which the LA can depart if the circumstances require. EXISTING HOURS Casino – No gaming on any weekday from 0600 to 1400; No gaming on any Sunday between 0400 and 1400 Betting Offices Only open 0700 and 2200 summer; Only open 0700 and 1830 winter Tracks No current rules	Default conditions – proposed hours Casino No gambling facilities may be offered between 6am and noon on any day. Betting Offices No gambling facilities may be offered between 10pm and 7am on any day. Tracks On days when no public sporting event is taking place on a track, no gambling facilities may be offered between 10pm and 7am. Bingo No gaming facilities may be offered between Midnight and 9am on any	Yes

	<p>Bingo</p> <p>No gaming except between 1000 and 2300 Mon-Fri</p> <p>No gaming except between 1000 and 0000 Sat</p> <p>No gaming except between 1400 and 2300 Sun</p>	day.	
‘Of the two options proposed do you agree that option ‘a’ is most appropriate?’	<p>The Government have considered for the first time whether to control the hours of opening for AGC’s and FEC’s under gambling legislation in addition to planning legislation or other byelaws.</p> <p>There are two options – (a) leave licensing authorities free to consider attaching conditions on hours as appropriate and there would be no national standard</p> <p>(b) set default hours – national standard but would depart from current position of being defined locally</p>	Option (a) – not a default condition – at LA discretion	yes
‘Do you agree that the proposed mandatory conditions on access between premises are appropriate?’	<p>Except in the case of tracks, a single premise may not have more than one premises licence authorising a type of gambling activity. This is likely to encourage neighbouring premises to have licences for differing types of activity and seek to utilise the custom. The Government feels it needs to regulate to provide safeguards for the public by controlling access arrangements between different premises licensed for different activities, particularly in the case of children.</p> <p>These conditions will be drafted in such a way to ensure any divide between premises is real and effective</p>	<p>Mandatory conditions</p> <p>There can be no direct, internal access between one licensed premises which children are not permitted by the Gambling Act to enter, and another licensed premises which children are not permitted by the Act to enter.</p> <p>There can be no direct, internal access between one licensed premises which children are not permitted by the Gambling Act to enter and another licensed premises or premises with a permit under the</p>	Yes

		<p>Gambling Act to which children are permitted to enter, except as between betting premises (betting shops and tracks).</p> <p>There can be no direct internal access between a premises with a bingo premises licence and a club with a club gaming or club gaming machine permit.</p>	
<p>'Do you agree with the proposed mandatory conditions relating to the entrance to casino premises?'</p>	<p>This is concerned with safeguards necessary to prevent the development of casinos in unsuitable premises and to protect children and other vulnerable people from inadvertent exposure to gambling opportunities.</p>	<p>Mandatory - The principal entrance to the premises should be from the street.</p> <p>No entrance to the premises should be from a premises wholly or mainly used by children and young people.</p>	<p>Yes</p>
<p>'Do you agree with the proposal for a mandatory condition prohibiting access to betting premises (except tracks) from other commercial premises?'</p>	<p>To ensure people who may be underage or vulnerable are not inadvertently drawn into gambling from having entered another premises</p>	<p>Mandatory - Prohibition on access to betting premises (except tracks) from other commercial premises</p>	<p>Yes</p>
<p>'Do you agree with the proposed mandatory conditions relating to access to areas within FECs and bingo halls?'</p>	<p>FECs and Bingo Halls – It will be an offence to permit a child or young person to enter any part of a licensed FEC where a category c machines is available and the Government feel this should also apply to bingo halls which permit children to enter</p>	<p>Mandatory- The requirements of Schedule 9 to the Gaming Act 1968 (paragraph 10B(3)(b)) will be replicated in mandatory conditions attached to FEC licences. These deal with separation of, and access to machines that are for over 18's only, supervision of the area in which these machines are kept, and notices stating the age limits. They will also</p>	<p>Yes</p>

<p>'Do you agree that a mandatory condition relating to visibility of the gambling area of the regional casino is appropriate?'</p>	<p>The Act allows children to the non-gambling areas of a regional casino as they will offer a mix of facilities. Strict safeguards are imposed to ensure children do not gain access to gambling areas. However the government also consider it appropriate to safeguard children from exposure to gambling</p>	<p>apply to bingo halls that do not have an over 18s only policy</p> <p>The gambling area of the premises shall not be capable of being seen from any part of the premises to which children or young people have access.</p>	<p>Yes</p>
<p>'Do you agree that the mandatory conditions set out relating to table gaming areas in Casinos?'</p>	<p>These requirements only relate to the 17 new casinos which will be defined by size, and standards will be set over how much of them will be used as gaming areas</p>	<p>Mandatory - Casinos must provide the following minimum table gaming area:</p> <ul style="list-style-type: none"> o Small casinos: a minimum of 500m² o Large casinos: a minimum of 1000m² o Regional casinos: a minimum of 1000m <p>Only table gaming may take place in the table gaming areas of casinos</p>	<p>No Comments as beyond our expertise</p>
<p>'Do you agree with the proposal to include a mandatory condition for casinos with converted licences specifying that they must offer a minimum non-gambling area equivalent to at least 10% of its total gambling area?'</p>		<p>New casinos must offer the following minimum non-gambling areas:</p> <ul style="list-style-type: none"> • Regional - 1,500m² • Large - 500m² • Small - 250m² • No gambling facilities may be offered in the non-gambling area. • The area must be readily accessible to customers (i.e. offices, kitchen areas, etc will not count). 	<p>No comment</p>

		<ul style="list-style-type: none"> • The area must include recreational facilities for casino customers which are available for use while the casino is open. • The area may include, but should not consist exclusively of, lavatories and lobby areas. 	
<p>'Do you agree with the proposed mandatory condition prohibition the consumption of alcohol of AGC and FEC premises?'</p> <p>'Do you agree with the proposed mandatory condition restricting activities that can be carried out in licensed betting offices?'</p>	<p>The Government's view is that the primary purpose of gambling licensed premises is to offer gambling facilities and therefore any non gambling activities should be ancillary, not distract customers and not of themselves provide an inducement to enter the premises.</p>	<p>Alcohol will not be permitted to be consumed on AGC and FEC premises.</p> <p>Licensed betting premises - No apparatus for making information or other material available in the form of sounds or visual images may be used on the licensed premises, except where the matter seen or heard is a sporting event and bets may have been effected on the premises in relation to that event.</p> <p>No music, dancing or other entertainment is to be permitted on the premises.</p> <p>Refreshments may be provided on the premises, but alcohol may not.</p> <p>The only publications that may be sold on the premises are racing periodicals or specialist betting publications.</p> <p>National Lottery products may not be sold on the premises</p>	<p>Yes</p> <p>Yes</p>

<p>'Do you agree with the proposed mandatory conditions specifying the information that is to be displayed?'</p>	<p>Conditions to include evidence on the premises that the relevant permissions are in place, rules on access to children and young people and the fair and open conduct of gambling i.e. rules, charges etc</p>	<p>All licensed premises A summary of the premises licence should be displayed on the premises.</p> <p>Existing and new casinos At all entrances to casinos a notice stating that no person under the age of 18 will be admitted. This requirement will not apply to the non-gambling areas of the regional casino.</p> <p>The rules of the games that are available to be played in the table gaming area must be displayed in that area (this can be by sign or leaflet).</p> <p>Bingo On the premises, a notice stating that no person under 18 can gamble on the premises.</p> <p>A notice displaying any admission charges and the charges for playing bingo games.</p> <p>AGCs On the premises, a notice stating that under 18's are prohibited from entering the premises and a notice stating that no alcohol may be consumed on the premises (which replicates the existing situation).</p> <p>Betting offices and tracks</p>	<p>Yes, but many of the premises where gambling will take place will be quite large it is felt that Licensing Authorities should have the power to impose a condition specifying the location and number and that they should be 'prominently' displayed.</p>
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<p>'Do you agree that track operators should have responsibility for ensuring that only appropriately licensed betting operators are accepting bets on their premises?'</p> <p>'Do you agree with the approach that there should be no licence condition limiting areas on a track where bets may be taken?'</p> <p>'In your view do you think that the proposed conditions are sufficient to protect the five times rule on horserace course?'</p> <p>'Do you agree with the proposal to replicate through conditions the operation of a totaliser at a dog track'</p>	<p>Control is needed to ensure that the public are not exposed to unlicensed betting operators while on a track.</p>	<p>The track operator will have to make arrangements to verify the operator licences of bookmakers permitted to operate on track, and to remove unlicensed bookmakers.</p> <p>The 'five times' rule (which requires that the charge made to the bookmaker for entry to that place does not exceed five times the cost of the highest charge made to the public to enter that place, or one times the charge for any bookmaker's assistant), will be replicated as a mandatory condition on betting premises licences for horserace and greyhound tracks in relation to the betting rings that are subject to the five times rule on 31 August 2007, including temporary betting areas. This will lapse after five years.</p> <p>A totaliser on a licensed dog track can be operated only while the public are admitted to the track for the purpose of attending dog races and no other</p>	<p>All seems sensible but no real expertise on the running of tracks</p>

		sporting events are taking place on the track; and for effecting betting transactions on dog races run on that track.	
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