

**Amanda Turner**

**From:** Brian Minihane [REDACTED]  
**Sent:** 09 August 2018 16:52  
**To:** Licensing  
**Subject:** Draft Gambling Policy 2019-2022 - consultation response

Good afternoon,

Further to the publication of your Draft Statement of Licensing Policy 2019-2022, we wish to respond to the consultation on just the following point:

**22.4 The Licensing Authority expects FOBT's to be positioned in such a way that they can be appropriately monitored by staff particularly where those staff are positioned at a counter away from the machines. In general the Authority is of the view that 'privacy screens' will hamper this and will expect the local area risk assessment to take this into account where applicants intend to construct such screens. Particular attention should be paid to the Gambling Commission's Social Responsibility Codes in this regard, especially code 9.11.1. Where an existing licensee adds 'privacy screens' a variation application will be required.**

We would not agree that a full premises licence variation is required for the installation of privacy screens around gaming machines. When we install such a set-up, we would, as a responsible operator, adopt the initial approach you have suggested above, taking into consideration the suitable positioning of the machine within the premises, and the ability of staff to be able to monitor the machines fully, as well as the GC SR Code mentioned, and we would also document this in the Local Area Risk Assessment. Although we would be more than happy to discuss any concerns you may have with our approach in any individual shop, given that all shops are of various sizes and layouts, and of course be willing to consider further appropriate measures to alleviate these concerns if the situation arose, we certainly feel that the requirement for a full licence variation is unnecessary. The Gambling Commission's own current documentation states that 'Plans must include : the boundary of the premises, external and internal walls, points of exit and entry (plus a description of where exit leads to and entry leads from)'. So, even the position of the gaming machines is not actually a requirement. We do show the positions of our machines on licence plans, and also any privacy screens around them, as we feel this is beneficial to Local Authorities, but we do not agree there can be a need to make a full variation, for the movement of a fixture which need not be shown. If there is any concern, it can be discussed without such application having to be made.

I would appreciate it if you could give further consideration to these comments, before the final Policy is produced.

If you have any other questions relating to this matter, please get in touch.

Kind regards  
 Brian



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