

Leicester
City Council

WARDS AFFECTED: ALL

**LICENSING COMMITTEE
CABINET
COUNCIL**

**10 November 2006
27 November 2006
30 November 2006**

GAMBLING POLICY

Report of the Corporate Director for Regeneration and Culture

1. Purpose of Report

- 1.1 The purpose of the report is to determine the Council's Gambling Policy as required by the Gambling Act 2005.

2. Summary

- 2.1 The Gambling Act 2005 comes into effect in 2007, with the transition period beginning on 30 April. As Licensing Authority, Leicester City Council is required to publish its Gambling Policy by 31 January 2007.
- 2.2 The proposed policy, shown at Appendix 2, focuses on those areas in which the Council has discretion. In particular, this includes:
- The locations considered suitable for different types of gambling premises;
 - The conditions that will be considered when granting licences;
 - The requirements for gaming machines in pubs, clubs and amusement arcades (referred to as "family entertainment centres"); and
 - The Council's policy on new casinos.
- 2.3 The timetable to publish a gambling policy, required by the legislation, does not integrate easily with the bidding process for new casinos that is still ongoing. For this reason it is not proposed that there should be any consideration of adopting a "no casino" policy at this stage. If the Council is ultimately awarded a licence for a new Casino, the Council will have the opportunity to consider this matter again.

3. Recommendations

- 3.1 Cabinet is asked to recommend the draft Gambling Policy to be approved by Council.
- 3.2 Council is asked to approve the draft Gambling Policy as recommended by Cabinet.

4 Financial & Legal Implications

Financial Implications

- 4.1 Premises licence fees will be set in a series of bands with a prescribed maximum for each band. Licensing authorities will be able to set licence fees within each band so as to ensure full cost recovery. It is anticipated that the fees will cover all costs, thus there should be no additional costs on Leicester City Council.

Martin Judson
Head of Finance R&C ext 7390

Legal Implications

- 4.2 The Gambling Act 2005 requires Licensing Authorities to prepare and publish a licensing Policy Statement. The Licensing Policy Statement will last for a maximum of 3 years, but can be reviewed and revised by the authority at any time.
- 4.3 The statement must be produced following widespread consultation with
- 1) the chief officer of Police for the authority's area
 - 2) persons who appear to the authority to appear to the authority to represent the interests of the persons carrying on gambling businesses within the area, and
 - 3) persons who appear to the authority to represent the interests of persons who are to be effected by the exercise of the authority's functions under the Act.
- 4.4 Regulations state the Licensing Authority must set out the principles, it proposes to apply in exercising its functions under the Act during the 3 year period to which the policy applies.
- 4.5 Regulations also state that the Licensing Authority Policy Statement is a shared responsibility of the full Council and the executive. Therefore it has to be considered by the Cabinet and approved by full Council before it is published.

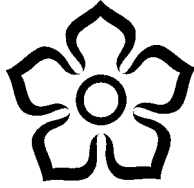
Jamie Guazzaroni - 2 October 2006

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DECISION STATUS

Key Decision	Yes
Reason	Part of budget and policy framework
Appeared in Forward Plan	Yes
Executive or Council Decision	Council



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GAMBLING POLICY

Report of the Corporate Director for Regeneration and Culture

Report

1. Background

- 1.1 The Gambling Act 2005 comes into effect in 2007. The transition period, during which application can be made to convert an existing licence, will run from 30 April to 31 July, and the Act is due to be in full operation on 7 September. The City Council must publish its Gambling Policy by 31 January.
 - 1.2 Before the City Council can publish its Gambling Policy, the Act requires it to consult with:
 - The Chief Officer of Police
 - Gambling businesses
 - Persons likely to be effected by gambling.
 - 1.3 This consultation has now been completed. It consisted of a one-to-one interview with Leicestershire Police, written consultation with 31 gambling businesses in Leicester, 563 members of the People's Panel and 15 stakeholder organisations (see Part A Section 2 of the draft policy for details). Responses were received from 264 members of the People's Panel, 9 gambling businesses and 5 stakeholder organisations. Five focus groups attended by approximately 10 – 12 members of the public were also held. The draft policy and an on-line consultation form were also available on the Council's website.
- #### **2. Consultation Response and Proposed Amendments to Draft Policy**
- 3.1 Full details of the consultation response are shown in the consultant's report at Appendix 1. A summary of the most significant findings and proposed amendments are set out below.

Location of premises

- 3.2 The public and businesses were asked to comment on the suitability of various types of location for each type of gambling premises. Generally, the City Centre was considered suitable for all types of premises, whereas residential areas and areas near sensitive locations such as schools and places of worship were considered unsuitable. Local shopping areas were considered suitable for bingo, pubs with gaming machines and betting shops.
- 3.3 The draft policy has been updated to reflect the findings of the consultation.

Door supervisors

- 3.4 The general view from the public and businesses was that door supervision had an important role to play in achieving the licensing objectives. Across the two groups, casinos and family entertainment centres were seen as the two most important venues that should have door supervision.
- 3.5 The Gambling Act has amended the Private Security Industry Act to exempt in-house door supervisors at casinos and bingo premises from requiring to be licensed by the Security Industries Authority (SIA). However, this requirement can be imposed by a licensing authority on a case-by-case basis. The focus groups expressed the view that vetting of door supervisors was important. This is achieved by SIA registration.
- 3.6 The draft policy recognises the potential benefits of door supervision and states that the City Council will decide on the need for this on a case-by-case basis. Similarly, it notes the benefits of SIA registration, but because this may not be essential for all premises, for instance members only premises, it does not make this an absolute requirement.

'No casinos' policy

- 3.7 Licensing authorities are able if they wish to consider having a "no casino" policy, and if they do, this must be included in their Gambling Policy. A "no casino" policy has no effect on existing casinos, but prevents a licensing authority from issuing a new casino licence. The Act limits the number of new casinos nationally to one regional, eight large and eight small. There is a bidding process in progress for new casinos and the City Council has made a bid that has been successful in the rounds completed to date.
- 3.8 The template used for the consultation was based on the Local Authority Coordinators of Regulatory Services (LACORS) template on which most local authority draft policies have been based. This contains a section on whether the Licensing Authority should adopt a "no casino" policy and so this formed part of the consultation. There is though, no requirement for the Council to even consider whether it wants to have a "no casino" policy if it does not wish to.
- 3.9 The response to the public survey with the People's Panel was that 53% were in favour of a "no casino" policy. This compared with 77.8% of gambling businesses that were opposed to a "no casino" policy.

- 3.10 In determining its Gambling Policy, a licensing authority must have regard to the licensing objectives. However, when deciding whether to have a “no casino” policy a licensing authority may have regard to any principal or matter. The City Council’s bid to be awarded the ability to licence one of the new casinos emphasises, among other benefits, the significant positive benefit that a casino would have on regeneration and employment.
- 3.11 Officers’ view is that because the City Council’s bid for a new casino is still live, it would be premature for the Council to consider having a no casino policy. If the bid is ultimately successful, it may then be appropriate to have a wider debate, involving specific consultation, which could consider all aspects of a casino development, including regeneration and employment.

Unlicensed Family Entertainment Centres

- 3.12 Persons who wish to run gambling premises comprising of gaming machines, often referred to as amusement arcades, may apply to the licensing authority for a permit rather than going through the licensing process, which would require them to have an operators licence.
- 3.13 Licensing authorities are not allowed to attach conditions to permits, but are allowed to adopt a statement of principles that it will use to determine the suitability of applicants. The draft Policy sets out the principles that the Council will adopt, including CRB checks for applicants and staff. The public and businesses supported this approach.

Gaming Machine Permits for Alcohol Licensed Premises

- 3.14 Premises licensed to sell alcohol under the Licensing Act 2003 must be granted a permit for up to two gaming machines automatically. The licensing authority may only remove this right in certain circumstances, for instance if an offence under the Act has been committed.
- 3.15 As well as the licensing objectives and guidance, the licensing authority may take into account other information that it thinks relevant. The draft policy sets out what the City Council will consider.
- 3.16 A response has been received from the British Beer and Pub Association (BBPA). This is shown in the consultant’s report. They are opposed to the City Council having a “statement of principals” setting out the criteria for issuing additional gaming machine permits to alcohol licensed premises. Although the draft policy does not contain a statement of principals, it does explain what the Council will take into account. Officers consider this to be worthwhile in the interests of clarity and transparency. The BBPA also feel that applications for up to four machines should not require a hearing. This is not something that is included in the draft policy but is members may wish to give it consideration.

Style and Content of the Policy

- 3.17 There was some divergence in opinion about the style and contents of the policy, this included whether the policy needed to include extra information about the legislation and statutory guidance. In general, businesses would prefer more details, whilst the public would prefer a policy that was easier to read.

3.18 Officers' view, from experience of operating the Licensing Act policy, is that it is preferable for the policy to concentrate on policy matters over which the City Council has some discretion. General advice on areas of legislation, government guidance, applications and so on can best be dealt with in separate advice leaflets. One benefit of this is that the advice notes can be revised without the need for a further consultation exercise.

4. Equality issues

4.1 An Equality Impact Assessment for the Policy will be completed before it is presented to Council. The public and businesses were asked to identify any areas in which they considered that the policy may have an equality impact. None were identified. A provisional assessment is attached at Appendix 3.

5. Crime & Disorder

5.1 One of the three licensing objectives contained within the Act is "preventing gambling from being a source of crime and disorder, being associated with crime and disorder or being used to support crime". The Gambling Policy sets out how this is to be achieved. In determining the Policy one-to-one interview has been carried out with a representative of the Chief Officer of Police.

OTHER IMPLICATIONS	YES/NO	PARAGRAPH REFERENCES WITHIN SUPPORTING PAPERS
Equal Opportunities	Yes	See 3.1 above
Policy	Yes	Throughout
Sustainable and Environmental	No	
Crime and Disorder	Yes	See 5.1 above
Human Rights Act	No	
Older People on Low Income	No	

6 Background Papers – Local Government Act 1972

Gambling Act 2005

7 Consultations

Licensing Committee – 8th June 2006
 Gambling Businesses
 Leicester People's Panel
 Leicestershire Constabulary
 Head of Legal Services
 Head of Finance

**A review of consultation
On
Gambling Policy
For Leicester City Council**

REPORT

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***Celebrating 15 years
In Consultation 1991 - 2006***

August 2006

Report from SMSR Appendix 1

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Report from SMSR Appendix 1

Report from SMSR Appendix 1

1.0 Summary

1.1 A consultation has been undertaken on behalf of Leicester City Council by SMSR with regard to their proposed gambling policy and document.

1.2 The consultation consisted of a postal survey with 564 members of Leicester City council's People's panel (47% response rate) and 31 gambling organisations (29% response). In addition, five focus groups were held with the general public and a face to face interview was held with the licensing officer of Leicestershire Constabulary.

Overall

1.3 The focus groups showed that gambling is an emotive subject with the general public. Whilst they are aware that it is very popular, there is high awareness and concern as to its potential negative impact on people and families.

1.4 They understand that there is a large range of gambling available in Leicester yet 'no more' than any other city and indeed far less than when compared to say Nottingham.

1.5 They all recognise the need for control and regulation and to date; feel that Leicester City Council have 'got it about right' and indeed the overall message is 'steady as she goes'.

1.6 The major areas of concern in terms of any increase in gambling are:

- How does the city measure the demand for gambling as there is an underlying concern that the provision of facilities creates demand?
- That more resource needs to be put into supporting 'victims of gambling' and their families.
- That with any increase in gambling provision (especially casinos) there is an underlying financial motivation, especially by the city Council and there is a need to demonstrate the wider economic impact argument for gambling on the community as a whole.

1.7 Of all the various forms of gambling, bingo is viewed differently to the others which are predominantly seen as being 'an end in themselves' whilst Bingo is seen as being far more a 'means to an end' namely as offering a social service of companionship and friendship especially to the elderly.

1.8 The resident's and business survey demonstrated that the City Council has overwhelming support in setting a gambling policy and 'policing' it by the very positive responses to certain attitudinal statements.

1.9 Likewise there is widespread agreement that supervisory staff must be CIB checked.

Report from SMSR Appendix 1

1 Location

- 1.10 Businesses showed less concern about location than did the general public who demonstrated a social impact concern. Casinos created the greatest comment there being a view that they should either be in the City Centre or based at locations such as e.g. Meridian Park. The focus groups showed support for Casinos to be an integral part of a Leisure complex.
- 1.11 For Bingo the key location issue was the availability of transport - both public transport and car parks.
- 1.12 The City Centre was the most popular choice for most forms of gambling provision, although it was noted that it is becoming a residential area.
- 1.13 Some concern regarding the possible negative social impact of gambling was demonstrated by the location of betting shops in housing estate shopping precincts. Against this, the ABB were able to demonstrate effective policing of their industry and the Constabulary raised no concerns.
- 1.14 Business responses relating to location appeared to relate far more to the locations ability to generate business rather than social issues.

2 No Casino Policy

- 1.15 The general public survey showed there an overall majority (just) in favour of a 'No Casino' policy (54%) whilst only 22% of the business sector where in favour.
- 1.16 The focus groups felt that there are sufficient casinos in Leicester and that any lack of capacity should be absorbed in neighbouring Nottingham.

3 Door Supervision

- 1.17 Door supervision was seen as being essential. It was also seen that it is currently provided in a range of differing forms, from direct supervision in Casinos, to 'indirect' supervision by staff in Betting shops, Bingo Halls and Pubs. The major concern related to Family Amusement Centres which were seen as being 'loosely' supervised, attracting young persons. The constabulary also felt that Family entertainment centres were the most in need of additional door supervision due to their ability to attract youth.
- 1.18 From the Police's and industry perspective, Casinos are the most well staffed/trained form of gambling provision. Industry representative bodies were also able to demonstrate effective door supervision.
- 1.19 The focus groups demonstrated a view that the City Council needs of have (and be seen to have) a regular 'random inspection' of the supervision of gambling premises.
- 1.20 Effective selection and training of staff including CIB checks for relevant offences were seen as being essential.

4 The Gambling Act statement

Report from SMSR Appendix 1

- 1.21 All groups in the consultation saw the policy as 'about right'. Certain industry bodies, including the ABB want some specific additions and all asked to be kept informed. Likewise the Constabulary was also in favour of it.
- 1.22 The general public recognised it to be a technical/legal document and had some concerns about its language and presentation. Rather than attempt to make it 'user friendly' it may be more appropriate to produce a summary version / pamphlet of it for general distribution, possibly with the Council Tax bill. Some focus group respondents felt that this would be another way of informing the public of another service that the Authority provides and help to demonstrate it is giving 'value for money'.

Disadvantaged Groups

- 1.23 Most felt that the draft policy did not have major adverse implications for any disadvantaged groups. This had two dimensions – the document and the policy. For the former there is the need to ensure those with eyesight impairment can read it and there is the need for other languages. The latter is to ensure that the policy does not disadvantage or insult any group/gender/faith. It was felt that a summary document would assist.

5 Other issues and comments:

- 1.24 An emerging issue from the focus groups for the city council was a view that the City Council should not be focusing on building new gambling facilities but rather on providing leisure facilities for local people. Whilst this is outside the brief of this consultation, it is still an important message.

Report from SMSR Appendix 1

2.0 Introduction

- 2.1 In line with the introduction of the new Gambling Act, Local Authorities are required to introduce a new Gambling Policy that reflects the changes in the law. There is an equal need to demonstrate that the proposed policy has been subjected to rigorous consultation.
- 2.2 To satisfy this consultation requirement, Leicester City Council commissioned SMSR Ltd, an independent public consultation company to undertake the required consultation.
- 2.3 This report contains the results from the consultation.

Report from SMSR Appendix 1

3.0 Methodology

3.1 A multi-staged consultation approach was adopted both in terms of who and 'how many'. The programme was as follows:

Stage1 – Survey

3.2 Two postal surveys were undertaken using a postal survey undertaken using a questionnaire developed by SMSR in conjunction with the City Council (see appendix). The two surveys were with General Public and the industry. The general public was accessed via Leicester City council's People's Panel. The response rates were as follows:

Survey	Sent out	Responses	%
General public	563	264	46.7
Business	31	9	29.0

Stage 2 – Focus Groups

3.3 Five focus groups were held on Wednesday 9th August 06 and Thursday 10th August 06 at the City Council Offices Leicester. The groups were recruited from the City's Citizen's Panel by SMSR. Approximately 10 – 12 citizens attended each group and while the majority of respondents were mature white British, the groups included young and residents from other ethnicities.

3.4 The discussion guide (see Appendix) covered the following issues:

- Casinos
- Location
- Door Supervision
- The Gambling Act Statement
- Any other issues

3.5 A separate face to face interview was held with the Licensing Sergeant of Leicestershire Constabulary.

Report from SMSR Appendix 1

4.0 Sample

4.1 For the General Public the following persons were surveyed:

Gender

	Number	%
Male	137	52.5
Female	124	47.5
Total	261	100.0

Ethnicity

	Frequency	Percent
British	194	75.8
Irish	7	2.7
Any other White background	9	3.5
Indian	30	11.7
Pakistani	2	.8
Any other Asian background	1	.4
Chinese	2	.8
White and Black Caribbean	2	.8
White and Black African	4	1.6
White and Asian	1	.4
Any other mixed background	1	.4
Other ethnic group	3	1.2
Total	256	100.0

Disability

		Frequency	Percent
Valid	0	1	.4
	Yes	228	87.4
	No	32	12.3
	Total	261	100.0

Report from SMSR Appendix 1

Age

	Frequency	Percent
18-24	6	3.7
25-34	16	9.9
35-44	26	16.0
45-54	34	21.0
55-64	37	22.8
65+	43	26.5
Total	162	100.0
Missing	102	
Total	264	

4.2 Responses were received from the following organisations:

- British Beer & Pub Association
- GAMCARE
- Leicestershire Police Constabulary
- The British Casino Association
- The Association of British Bookmakers

Report from SMSR Appendix 1

5.0 Survey Findings

Location

5.1 Respondents were asked how important they felt the locations of the following types of gambling premises are. In descending order of 'Very important', the responses were:

	Very important	Fairly important	Neutral	Not very important	Not at all important
Casinos	69.7	10.0	5.4	4.6	10.3
Bingo Halls	33.0	34.9	16.9	8.4	6.9
Family entertainment	38.2	31.7	17.8	7.7	4.6
Public houses with AWP's	27.8	36.3	22.8	6.9	6.2
Betting offices	27.6	32.6	22.2	11.1	6.5

5.2 The location of Casinos was clearly seen to be 'the most sensitive'. To give greater clarity to these responses, respondents were asked 'How suitable do you think the following locations are for the specific types of gambling facilities shown?' Comparing the totals of 'very and fairly suitable gives the following table:

	Casinos	Bingo Halls	Pubs with AWP's	Family entertainment centres	Betting Offices
<i>City Centre</i>	64.3	65.2	75.2	68.0	79.4
<i>Local shopping centre</i>	14.4	46.1	51.3	42.4	60.9
<i>Other business /community area</i>	18.3	35.4	35.4	25.3	31.3
<i>Residential area</i>	1.9	15.9	23.7	7.1	15.2
<i>Near sensitive locations such as school, places of worship etc</i>	1.6	2.7	6.3	2.4	2.0

5.3 This shows that the City centre is the preferred location for ALL of the five forms of gambling. Some of the other locations were also seen as being suitable for the other forms of gambling, with the exception of casinos, where the city centre is the only preferred location.

5.4 Of these other locations, local shopping centres and 'other business/community' areas were seen as being suitable with the exception of gambling.

5.5 Sensitive areas were not seen as being suitable locations for ANY of the forms of gambling whilst Residential areas were only seen as being suitable for public houses with AWP's.

Report from SMSR Appendix 1

No Casino Policy

5.6 Respondents were asked if they thought the City Council should introduce a 'no casino policy'? A little over 50% said yes:

Response	%
Yes	53.4
No	34.7
Don't know	11.8

5.7 The main negative reasons for this were:

- 29% of respondents felt that gambling can ruin people's lives and shouldn't be encouraged;
- 12% felt that there were already enough casinos in Leicester.

5.8 However, nearly 12% of respondents thought that people should be allowed a choice to use gambling as a form of entertainment, and nearly 9% thought that casinos would boost the local economy.

Door Supervision

5.9 Respondents were asked on a five point importance scale how important door supervision was for the five forms of gambling. Responses were as follows (in descending order):

	Very important	Fairly important	Neutral	Not very important	Not at all important
Casinos	78.4	12.9	3.8	1.6	1.2
Public Houses with entertainment with prizes (i.e. fruit machines)	33.5	29.1	22.4	12.2	2.8
Family Entertainment	27.3	31.3	25.8	14.1	1.6
Bingo Halls	25.4	38.3	21.7	10.3	1.6
Betting Offices (bookmakers)	15.0	15.7	30.7	28.3	10.2

Report from SMSR Appendix 1

Attitudes towards gambling

5.10 Respondents were asked to what extent they agreed with the following statements. A comparison of them gave the following responses:

	Agree strongly	Agree	Neutral	Disagree	Disagree strongly
The applicant should set out the types of gaming that he or she is intending to offer.	78.8	14.9	2.4	2.4	1.6
The applicant should be able to demonstrate that they understand the limits to stakes and prizes that are set out in regulations.	77.7	18.0	2.0	1.2	1.2
That the gaming is offered within the law.	85.1	10.6	1.6	.4	2.4

5.11 This shows overwhelming support towards these issues. This was reinforced further when they were asked if they thought the City Council should ask applicants to demonstrate the following:

	Agree strongly	Agree	Neutral	Disagree	Disagree strongly
A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FEC's.	83.5	11.8	3.9	-	.8
That the applicant has no relevant convictions (as set out in Schedule 7 of the act).	83.9	10.6	3.9	.8	.8
That the staff are trained to have a full understanding of the maximum stakes and prizes.	83.5	13.0	3.1	-	.4

Report from SMSR Appendix 1

- 5.12 Likewise, when asked which of the following convictions (if any) do you think should be taken into account when recruiting staff for unlicensed Family entertainment Centres?

	Frequency	Percent YES
Violence	255	98.5
Dishonesty	243	93.8
Sexual offences	239	92.3
Certain motoring offences	58	22.4
Other	52	20.1

- 5.13 The 'other' referred to:

Offence type	%
Drugs related offences	38.5
Fraud /Deception	26.9
Theft / Burglary	13.5
Anti social behaviour	13.5
Racism	5.8
Crimes against children	1.9

- 5.14 Respondents were also asked if they considered whether the following matters regarding premises and clientele should be taken into account:

	Agree strongly	Agree	Neutral	Disagree	Disagree strongly
Location of premises	63.5	24.3	8.6	2.4	1.2
Size of premises	51.0	30.4	14.8	2.7	1.2
Clientele	54.4	23.6	17.6	3.2	1.2

- 5.15 Finally they were asked if there any other factors you think the City Council should take account of. Responses attracting over 1% were:

Factor	%
None	81.0
History of applicant	4.3
How the venue tackles under age drinking / gambling	4.0
Intended opening hours	2.8
How responsibly the venue treats gambling	1.6
Security	1.2
Who will benefit from money raised through gambling	1.2

Report from SMSR Appendix 1

Gambling Policy Document

5.16 Respondents were asked about various aspects of the document:

Aspect	Yes (%)	No (%)
Is the Gambling Act easy to read and understand?	77.5	22.5
Would you prefer a document that is less detailed?	46.3	53.7
Would you prefer fewer references to the statutory guidance?	39.2	60.8

5.17 Other comments made included:

Factor	%
None	87.1
A less detailed summary should be provided with the policy	3.0
Reduce the amount of jargon	1.9
Basic English needed	1.9
More attractive layout	1.1
Should be more concise / detailed	1.1

5.18 Residents were asked if they thought the draft police could have any adverse implications for disadvantaged group. Only just over 10% thought it would, although many were unsure:

Yes	14.3%
No	52.6%
Don't know	33.1%

5.19 For those that said 'yes' the main reasons given were:

Reason	%
Some groups may need the policy translating	20.0
The policy is not written in a way that everyone can understand	20.0
No one in particular but you can never please everyone	16.0
Policy could upset families who have had to deal with gambling addiction	12.0
Disabled people may have difficulty understanding the policy	8.0
Could offend people who do not gamble for religious reasons	8.0

5.20 This shows the need to demonstrate sensitivity towards disadvantaged groups.

Report from SMSR Appendix 1

6.0 – Business Survey

6.1 The survey was repeated across various businesses in the gambling industry.

Location

6.2 They were asked how important is the location of the following types of gambling premises:

	Very important	Fairly important	Neutral	Not very important	Not at all important
Casinos	37.5		12.5	-	50.0
Bingo Halls	12.5	12.5	12.5	-	62.5
Public Houses with AWP's	-	-	28.6	42.9	28.6
Family entertainment	25.0	12.5	12.5	25.0	25.0
Betting Offices	55.6	22.2	22.2	-	-

6.3 Interestingly, unlike the responses from the general public, for businesses the location of the premises is not important with the majority of respondents feeling that it was 'not at all important'. The only exception was the opinions regarding the betting office, with over 55% feeling that the location 'very important'.

6.4 Business were also asked how suitable were the following locations are for the specific types of gambling facilities. Taking each type of facility in turn:

Casinos

	Very suitable	Fairly suitable	Neutral	Not at all suitable
City Centre	75.0	-	12.5	12.5
Local shopping centre	25.0	25.0	12.5	37.5
Residential area		12.5	12.5	75.0
Other business / community area	12.5	12.5	37.5	37.5
Near sensitive locations such as schools, places of worship etc	-	-	22.2	77.8

6.5 Exactly 75% of respondents felt that the City centre was the most suitable location for a casino, the least suitable location being near a school or place of worship, with nearly 80% feeling it was 'not suitable at all'.

Report from SMSR Appendix 1

Bingo Halls

	Very suitable	Fairly suitable	Neutral	Not at all suitable
City Centre	11.1	22.2	11.1	55.6
Local shopping centre	22.2	11.1		66.7
Residential area	11.1	11.1	11.1	66.7
Other business / community area	12.5	-	37.5	50.0
Near sensitive locations such as schools, places of worship etc	25.0	--	12.5	62.5

6.6 Interesting 50% or more felt all the locations weren't suitable.

Public houses with amusements with prizes (i.e. fruit machines)

	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable
City Centre	22.2	11.1	-	-	66.7
Local shopping centre	22.2	-	-	-	77.8
Residential area	22.2	11.1	11.1	22.2	33.3
Other business / community area	22.2	11.1	22.2		44.4
Near sensitive locations such as schools, places of worship etc	12.5	12.5	12.5	25.0	37.5

6.7 The opinions of the location of the Public Houses followed those of the bingo halls with the majority of respondents feeling that none of the locations mentioned above were a suitable location.

Family entertainment centres (amusement arcades)

	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable
City Centre	66.7	16.7	16.7	-	
Local shopping centre	16.7	33.3	33.3	-	16.7
Residential area	-	-	33.3	33.3	33.3
Other business / community area	-	16.7	50.0		33.3
Near sensitive locations such as schools, places of worship etc	-	-	33.3	33.3	33.3

6.8 Nearly 70% of respondents felt that the City centre was the most suitable location for family entertainment centres. Local shopping centres were thought to be the least suitable location with nearly 17% of respondents feeling it was not suitable.

Betting offices (bookmakers)

	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable

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City Centre	71.4	28.6	-	-	-
Local shopping centre	85.7	14.3	-	-	-
Residential area	57.1	28.6	14.3	-	-
Other business / community area	42.9	28.6	14.3	-	14.3
Near sensitive locations such as schools, places of worship etc	-	14.3	28.6	14.3	42.9

6.9 Local shopping centres were thought to be the most suitable location for a betting office (85%), whilst nearly 43% of respondents felt that 'sensitive locations' were the *least* suitable.

No Casino Policy

6.10 Nearly 80% felt the city should NOT introduce a 'no Casino' policy:

Yes	22.2%
No	77.8%
Total	100.0%

6.11 The main reasons given for this were:

Reason	%
It wouldn't deter people from gambling	22.2
Gambling can ruin people's lives so should not been encouraged	22.2
Casinos boost local economy	11.1
No particular reason	11.1
Don't know	33.3
Total	100.0

6.12 Opinion was split with over 22% feeling that if it was introduced, it would not deter people from gambling whilst the same % felt that gambling can ruin people's lives.

Report from SMSR Appendix 1

Door Supervision

- 6.13 Businesses were asked 'How important do you feel it is to have door supervisors at the following premises'?

	Very important	Fairly important	Neutral	Not at all important
Casinos	75.0	25.0	-	-
Bingo Halls	25.0	25.0	12.5	37.5
Public houses with AWP's	25.0	25.0	12.5	37.5
Amusement arcades	25.0	37.5	-	37.5
Betting offices (bookmakers)	50.0	12.5	25.0	12.5

- 6.14 75% of respondents felt that having door supervisors was very important in casinos, whereas bingo halls, public houses and family entertainment centres were seen as locations where the need for a door supervisor was not so important.

Attitudes towards Gambling

- 6.15 To gauge attitudes towards gambling, businesses were asked to what extent did they agree with the following statements:

	Agree strongly	Agree	Neutral
The applicant should set out the types of gaming that he or she is intending to offer:	75.0	25.0	-
The applicant should be able to demonstrate that they understand the limits to stakes and prizes that are set out in regulations.	87.5	-	12.5
That the gaming is offered within the law.	75.0	25.0	-

- 6.16 The majority of respondents agreed strongly with all of the above statements.

- 6.17 They were also asked whether they thought the City Council should ask applicants to demonstrate:

	Agree strongly	Disagree strongly
A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FEC's	100	-
That the applicant has no relevant convictions (as set out in Schedule 7 of the Act)	87.5	12.5
That staff are trained to have a full understanding of the maximum stakes and prizes	100	-

- 6.18 The majority of respondents, if not all, agreed strongly with all of the statements.

- 6.19 With regard to recruiting staff, they were asked which of the following convictions (if any) do you think should be taken into account when recruiting staff for unlicensed Family entertainment Centres?

Conviction	%
Violence	100.0
Dishonesty	100.0
Sexual offences	100.0

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Certain motoring offences	12.5
Other	0

6.20 This shows that violence, dishonesty and sexual offences were all thought of as factors that should be taken into account when recruiting staff for family entertainment centres.

6.21 Other factors to be taken into account were:

	Agree strongly	Agree	Disagree	Disagree strongly
Location of premises	37.5	37.5	12.5	12.5
Size of premises	50.00	37.5	-	12.5
Clientele	37.5	37.5	-	25.0

6.22 Exactly 50% agreed strongly that the size of the premises should be taken into account, and nearly 38% agreed that both the location and clientele should be taken into account.

6.23 The only other Factor that one business felt the City Council should take account of was 'How the venue tackles under age drinking / gambling'.

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Gambling Policy Document

6.24 As with residents, Businesses were asked about the following aspects of the policy document:

	Yes	No
Is the Gambling Act easy to read and understand?	55.6	44.4
Would you prefer a document that is less detailed?	11.1	88.9
Would you prefer fewer references to the statutory guidance?	33.3	66.7

6.25 The responses were very different to the general public with nearly 56% felt that the Gambling Act was easy to understand and nearly 90% felt that they would not prefer a less detailed document. Almost 67% felt that they would not prefer fewer references to statutory rights.

6.26 Only one business made an additional comment saying that 'Statements should be very clear to avoid loopholes'.

Disadvantaged Groups

6.27 In terms of disadvantaged groups, businesses were asked if they thought the draft policy could have any adverse implications for disadvantaged groups.

Yes	22.2%
No	55.6%
Don't know	22.2%
Total	100.0%

6.28 Over 55% of respondents felt that the draft policy would not have any implications for disabled groups. However, those who thought that it would, the respondents felt that disabled people may have difficulty understanding the policy.

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7.0 Focus Group findings

Gambling Policy Consultation

- 7.1 Five focus groups were held on Wednesday 9th August 06 and Thursday 10th August 06 in City Hall Leicester. The groups were recruited from the City's Citizen's Panel by SMSR.
- 7.2 Approximately 10 – 12 citizens attended each group and while the majority of respondents were mature white British, the groups included young and residents from other ethnicities. The discussion guide (see Appendix) covered the following issues:
- Casinos
 - Location
 - Door Supervision
 - The Gambling Act Statement
 - Any other issues

Overall views on gambling.

- 7.3 It was difficult to talk about gambling policy without initially talking about the generic subject of gambling. This in itself proved difficult proved to be a difficult and emotive subject to discuss, as gambling holds the duality of being a popular activity yet at the same time is a 'taboo' subject to many! It was therefore necessary to discuss it in the 'third person' i.e. what others have done rather than asking a person directly.
- 7.4 Many respondents saw gambling as 'anti society/community' yet take the pragmatic view that it is better to provide legal facilities and control it than ban it as all that will do is 'drive it underground'.
- 7.5 Some attendees did however see good things about gambling, including:
- Winning
 - Entertainment
 - Revenue
 - Bringing people to the town
- 7.6 Equally, attendees spoke of negative things about gambling, such as:
- Destructive
 - Losing
 - Criminality
 - Money laundering/ tax avoidance
 - Drugs
 - Violence
 - Unwanted characters
- 7.7 Several respondents in the various groups spoke of acquaintances that were unable to control themselves with regard to gambling and had got into serious debt and other such difficulties. Overall, there was a majority view that a consequence of the new gambling policy is for the City Council to provide support/resource for such eventualities.

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- 7.8 Turning to the specifics of gambling, most attendees recognise that there are a variety of forms of gambling in and *around* Leicester, they being:
1. Betting shops spread all around the City
 2. Bingo, mainly in industrial areas.
 3. Amusement arcades primarily in specific areas, e.g. Marchback Road
 4. Horse racing at Oadby, Leicestershire
 5. On-line betting
 6. Pubs with fruit machines, also cafes and restaurants
 7. Lottery, which is usually undertaken in supermarkets and newsagents and convenience stores.
 8. Several also mentioned internet gambling.
- 7.9 Many felt that these different forms of gambling were not all the same especially Bingo as it was felt that Bingo is very controlled insofar as it is a very structured process and it is difficult for any one person to spend excessively. It was also seen as being as much a social occasion whilst other forms of gambling weren't seen as being so. Indeed many respondents didn't see Bingo as gambling but rather 'a bit of fun'.
- 7.10 Betting shops were also seen as being part of the accepted fabric of every day life. Concern was however expressed that they appealed often to those parts of society that could least afford to gamble.
- 7.11 Likewise fruit machines were also seen as part of everyday life, provided they were controlled.
- 7.12 The major concern in most groups related to Casinos where it was felt that there is already sufficient provision and furthermore concerns were expressed about the fact that there is no restriction on the amount of money one could spend, by the provision of on-site cash withdrawal machines.
- 7.13 So whilst it was agreed that there was gambling in Leicester City; overall it is seen as not being a major problem as it does not figure very often in the local Press and there is little publicity associated with it. Indeed it was recognised that it was no more or less a problem than in any other City and probably less than in neighbouring Nottingham which was seen as having a much greater provision and 'problems'.
- 7.14 There was widespread agreement that Leicester City Council has 'got it about right' in terms of their regulation of gambling and furthermore it was hoped that there would be no relaxation of this policy.
- 7.15 There was a view / concern expressed that demand for gambling is provision led i.e. the more provision – the more the demand.
- 7.16 It was also felt that certain ethnic communities including the Chinese and Vietnamese had a great cultural passion for gambling and that these communities would undertake 'undercover / illegal' gambling often late at night when their businesses (often restaurants) had closed down and that this needs better controlling.
- 7.17 Some respondents felt that there was a need for the City Council to review: 'What is the demand for gambling?' It was equally felt that there is a need to

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demonstrate how gambling contributes to the City other than other than through the creation of employment.

7.18 Turning to the specific points raised in the consultation:

No Casino policy

7.19 Some of the focus groups expressed concern that this piece of consultation was a precursor to the City Council attempting to organise another Casino. There was a very strong feeling that there were already sufficient Casinos in the City. A debate took place about these casinos, it being noted that there were three, they being:

- Annabelle's
- Stanley
- Gala

7.20 A young Pakistani lady in one of the groups, felt that the reason why Casinos were so popular is that it had become the new 'in thing' for young people and she noted that many of her friends now went to the Casino after work, as it had become 'the cool place' to be seen. Furthermore, she went onto note that gambling itself was also a 'cool thing' to do.

7.21 Most respondents assumed that the 'no casino' policy meant 'no more' casinos. Comments included:

- 'This will not happen'
- 'I'm not in favour of the nanny-state but the government should take a lead in curbing the increase in gambling. They made a mistake with increasing the hours which pubs can open; this led to more anti-social behaviour. They should not have a laissez faire or a "let the market decide" attitude about gambling. It can have social consequences if someone is hooked'.
- 'It's naïve to think that if the council adopted a 'no casino' policy it would have any positive effects on the well being of Leicester's citizens. People who tend to use casinos are 'well-healed' and would drive to the next town/city. This would just have an adverse effect on the revenue the council raises".'

7.22 Opinion was very mixed with regard to such a policy, there being no clear picture. Both focus groups expressed the view that more males than females were likely to go to casinos so were not surprised that more of them were against the no casino policy.

Location

7.23 The feeling was that as betting offices, pubs, bingo halls and family entertainment centres were already established, it's unlikely that there are going to be waves of applications since they are already there. Turning to the specifics forms of gambling:

Casinos

7.24 With regard to Casinos, whilst there are already three casinos in Leicester, there is a feeling that more could be built, including a Super-casino. The location was felt to be very important though there were differing opinions as to where. The one thing that united almost all respondents was that they should not be built close to residential areas.

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7.25 Some felt the city centre was the best location (because of the infrastructure) but it was recognised that the city centre is itself fast becoming a residential area. The majority of people at the focus groups felt that if any new casino is to be built it should be at the Meridian Leisure complex or some similar out of town place. An additional reason for locating there (in addition to it being none residential) was that people would have to make an effort to go there and so would be less tempting to the passer-by.

7.26 One person said that if a super casino were to be built this should be outside of the city altogether and be part of a much larger entertainments complex, similar to what is in the USA and Australia. Many respondents felt that Leicester City Council would resist such a move so that the rent and other benefits will go to them!

Betting Shops

7.27 Most people felt that betting shops currently exist in all sorts of locations and cause few problems although some expressed concern relating to them being located in housing estate shopping precincts.

Bingo

7.28 Although it was felt that there are unlikely to be many new applications for bingo hall licenses, if there are then it's important that a car park and / or public transport links are provided for the older people to get to them.

Pubs

7.29 Not many people had strong views about the location of pubs with fruit machines. They are seen as not being appropriate in smaller and /or country type pubs due to the noise but most people didn't have a problem with them in either the city centre or residential areas.

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Family entertainment centres

- 7.30 It was noted that they are located in city centre locations and attract people passing by flashing lights, loud noises and advertising the chance of winning a large prize. Several attendees were worried that these centres attract under age people and introduce them to gambling.

Door Supervision

- 7.31 Opinions differed regarding the various forms of gambling:

Casinos

- 7.32 Most felt it's very important to have door supervision at casinos mainly to enforce the dress code, check ID and membership details and to be on hand if someone got aggressive after having spent too much. Current door policy was seen as being effective.

Bingo Hall/Bookmakers

- 7.33 Door supervision in both bingo halls and in bookmakers was not seen as being necessary as it was felt that they tend to police themselves.

Amusement Arcades

- 7.34 This was the one area where more door supervision was seen as being necessary as amusement arcades were seen to be a place where underage gambling occurs and that there should either be more door supervision here or at better trained staff to enforce the age laws.

Pubs

- 7.35 It was stated that many pubs already have door supervision and whilst this is important at some pubs, particularly at busy times it should be up to individual pubs to decide and it should not become compulsory. It was stressed that there is a need to ensure effective control of children and, as with the other Group, any gambling or gaming facilities should be put in separate rooms and be policed by the bar staff.

Fruit Machines

- 7.36 The groups did not like opportunities for children to gamble unsupervised like 'fruit machines in chip shops'. More could be done to stop these forms of gambling because it was felt that this is often where gambling starts'

Summary

- 7.37 The advantages of supervision were seen as being: Safety, security, enforcement of regulations & policies, deter drug use and other kinds of anti-social behaviour. Overall it was felt by the group attendees that supervision will help to reduce crime and disorder. The disadvantages were seen as being:

- 7.38 These are mainly down to the objectivity and professionalism of the door staff. For example it is not uncommon for women on their own or with girlfriends to be allowed into pubs whereas men aren't. It was felt that many door staff (in spite of attending training courses) may have aggressive tendencies and do not always exercise the principle of 'reasonable force' to deal with problem situations.

- 7.39 The group respondents were concerned about the vetting of door supervisors and wanted rigorous standards enforced. They felt it important that these people did not have criminal records. Equally, there were concerns about

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the accounting of vulnerable people. How would door supervisors make decisions about these? When would they turn people away? This needed further thought.

The Gambling Act statement

7.40 Whilst some agreed that it was fairly easy to read and understand most felt that there was too much detail and jargon. Most however felt the document was serving a purpose and it is a legal document.

7.41 Approximately 50% of the respondents felt that there is a need to say:

- what the main changes are in the legislation
- what the council has control over
- What are the key policy options are?

7.42 In terms of format, there was wide agreement that an abstract or a summary (a couple of pages) should accompany the larger document. Several felt that the summary should be 4 sides of A4 in plain English concentrating on key issues rather than all in detail as people can always get more from the detailed long version. Obviously, the statement needs to be accessible via the internet.

7.43 Specific items raised were:

- P9: Why are door supervisors exempt from the requirement to be licensed?
- Need to be much tougher on employers and employees in terms of criminal records – vetted by police etc
- Need more emphasis on what will count as vulnerable people – what counts as vulnerable – too drunk to drive too drunk to gamble? There do not seem to be any clear protections for vulnerable people which may mean that there are in fact none.

7.44 Regarding disadvantaged groups, most respondents felt the document could cause problems, both in terms of content (but probably no more than the average layman) and also in terms of form. There was a need for large print and Braille versions in addition to other languages. It was felt by most that these changes were more applicable to a shorter summary version document than the full version which would only be read by a minority.

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Conclusions from focus groups

7.45 Many of the general public hold conservative views about gambling and whilst recognising it is very popular, have concerns about its potential negative impact on certain individual members of society. Their biggest concern is the potential negative impact on 'the family'.

7.46 Overall they feel that there are no major problems with gambling in the City of Leicester and feel that the City Council has managed the situation well up to date. In terms of the new policy, the overall message is 'steady as she goes'.

7.47 They recognise there are several forms of gambling available to residents in and around Leicester. Of these, they feel that Bingo is the most community friendly as it provides the social service of friendship and community, especially for the elderly. This contrasts to many of the other forms of gambling which are seen as solitary person activities. A scale can be created as follows:

Friendly				unfriendly
Bingo	Pubs/awp	Betting shops	Amusement Arcades	Casinos

7.48 Most feel there is sufficient capacity already in Leicester, especially Casinos, and extra demand being supplied by near by Nottingham.

1 No Casino Policy.

7.49 Opinion was split on this. Whilst there are concerns, it is recognised that the evidence is different. Casinos appear to be more appealing to younger persons.

2 Location

7.50 A table can be created as follows for the preferred locations/type of gambling:

	Casinos	Bingo halls	Pubs/awp	Amusement arcades	Betting shops
City centre	X	X	X	X	X
Commercial areas	(X)	X			X
Shopping parades		X	X		X
Residential areas			X		
Out of city	X				

Report from SMSR Appendix 1

3 Door supervision

7.51 This was recognised as being necessary through out albeit in different forms:

Form of Gambling	Casinos	Bingo halls	Pubs/awp	Amusement arcades	Betting shops
Form of door Supervision	Continue as present	Separate staff not needed	Separate staff not needed	More enforcement needed	Separate staff not needed

7.52 The groups felt that most gambling forms had sufficient supervision currently with the exception of Amusement arcades, which were considered to attract underage users.

4 The Gambling Act statement

7.53 Most respondents found it sufficient but complex, but recognised that they were not the 'target audience'. They would have preferred a simplified summary document in 'lay mans language'. With regards to the current documents, some respondents felt it should include a summary of the main changes.

7.54 There is a need to allow for disadvantaged groups, especially by producing a shorter summary version in Braille, large print and other languages.

Report from SMSR Appendix 1

8.0 Specific Organisation Responses.

8.1 In addition to the responses to the consultation questionnaire, responses were also received from specific organisations.

- British Beer & Pub Association
- GAMCARE
- Leicestershire Police Constabulary
- The British Casino Association
- The Association of British Bookmakers

British Beer & Pub Association

8.2 Their response naturally focused mainly on the issue of AWP's. Key points arising from their submission are:

- They welcome the approach taken by the Council, in basing its draft statement on the LARCORS template.
- The protection of children and vulnerable people. They have noted that pubs have had AWP's for many years. They have been pressing for legislation prohibiting under-18s from playing them and very much welcome the restrictions contained in the new Gambling Act. They referred to their code of conduct and also their company training schemes on this issue.
- Additional permits. They stated that they do NOT see the need to introduce a separate statement of principles containing additional criteria for the granting of permits as outlined under the bullet points at the end of the 'Alcohol Licensed Premises' section. They feel that these are covered under their application for additional machine permits. They again noted that their code of conduct reflects this.
- Application procedures for more than two machines. They said they would welcome the inclusion in the policy of an outline of the application procedures for this. They feel that a hearing is not necessary if the application is for less than four machines. (They note that LARCORS are working on such standard permit application forms).
- Transitional arrangements. They feel there is a need to include reference to transitional arrangements in the policy.

GAMCARE

8.3 They included a list of generic issues that they created from reviewing 'quite a few' draft policies. The key issue they raise is that Local Authorities now have a 'Duty of Care' in assisting their residents with any gambling addiction. They add that they would welcome Authorities setting up a Gambling and Debt management counselling in conjunction with their Drug and Alcohol addition programmes.

Leicestershire Police Constabulary

8.4 Overall they felt that there are no problems with any licensing in the County (and City), it running smoothly and were certainly no more problematic than any other area.

Locations

8.5 They felt that most places would be acceptable with the exception of residential areas.

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Crime and Disorder

8.6 If there were any issues they related mainly to alcohol and certainly not because pubs have fruit machines on their premises. Casinos don't have any effect on crime and disorder.

No Casino Policy

8.7 They noted that the Companies which run all the casinos in Leicester are very well staffed and that there is a good understanding between them and the Constabulary. They felt such a policy was not necessary.

Door Supervision

8.8 The main area where there was maybe more need than others, he was Family entertainment centres. Whilst there have never been any reports of any trouble they know that quite a lot of these are unlicensed and that potentially they would benefit from having door supervision to stop young people from going in.

8.9 Pubs are well set up and bingo halls didn't need any more supervision for the market that they are in. Likewise they didn't feel Betting offices were an issue for door supervision

Staff appointments

8.10 They stated that CIB checks were essential and that they should be an automatic part of appointments. This was amplified in the case of establishments that deal with children. Because of this they felt that family entertainment centres were the most in need these stringent checks to be in place.

Policy document

8.11 Felt that it was technical and it was about as user-friendly as one could make it. Although it was technical, it was relatively easy to follow. It was about right in detail, not too much statutory guides and that areas don't really need improving. They didn't feel that there was any discrimination in the way it was presented

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The British Casino Association

- 8.12 The note that as the operation of casinos has been highly regulated over the past 40 years, the introduction of the “new” legislation will not impact on the high level of integrity with which these premises have historically operated.
- 8.13 They note that tight entry controls, including those on the verification of identity of all customers, prevent casinos creating any nuisance to the local community and is one of the reasons why Door Supervisors (Part B, Para 1) were deemed unnecessary by parliament and why gaming premises are already exempt from the provisions of the Security Industry Act.
- 8.14 They also make the point that the existing statutory bar on any person under 18 entering such premises is already strictly enforced by entry controls and therefore licence conditions will not be required to prevent access to machines (Part B, Para 14).

The Association of British Bookmakers

- 8.15 They make the point that the industry now consists of approximately 8,500 betting offices in Great Britain, which makes it by far the most numerous type of dedicated gambling facility; the average authority having about 20 betting offices within its area.
- 8.16 Furthermore they note that before the advent of the Gambling Act 2005, there was no national regulator for bookmakers yet they feel that the industry has been extremely successful at policing itself as Bookmakers have given rise to no or few regulatory concerns.
- 8.17 The ABB state that they welcome the new legislation, and the opportunity to work with licensing authorities, so as to consolidate and continue the enormous advances made by the industry, in a way which benefits customers while avoiding regulatory concerns. They say that they hope and expect that a light touch approach will be taken to the imposition of conditions and regulatory burdens on the industry save insofar as this is necessary and proportionate in individual cases.
- 8.18 They make the following five points with regard to the Leicester policy:

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i) Door Supervision

8.19 They note betting offices are supervised from the counter so that door supervision has not been operationally required, and add that neither the licensing justices nor the police have suggested that door supervision is necessary.

8.20 They therefore specifically request that the policy reflects this by stating:

“...there is no evidence that the operation of betting offices has required door supervisors for the protection of the public. The authority will make a door supervision requirement only if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and that door supervision is both necessary and proportionate.”

ii) Betting Machines

8.21 Again the ABB note that up to four FOBTs/AWPs will be found in the great majority of betting offices in the country they feel there is no evidence that where they do exist, they are causing any harm.

8.22 For these reasons, they state that while the section 181 discretion is acknowledged, it is respectfully suggested that the LCC policy state that:

“While the authority has discretion as to the number, nature and circumstances of use of betting machines, there is no evidence that such machines give rise to regulatory concerns. This authority will consider limiting the number of machines only where there is clear evidence that such machines have been or are likely to be used in breach of the licensing objectives. Where there is such evidence, this authority may consider, when reviewing the licence, the ability of staff to monitor the use of such machines from the counter.”

iii) Re - Site Applications

8.23 The ABB state that over the last two decades in particular, betting offices have been subject to an evolutionary process of enlargement and improvement to accommodate that has frequently involved re-siting within the same locality. Furthermore they note that under the former regime, such re-sites were positively welcomed by licensing authorities concerned and were rarely objected to by competitors.

8.24 They therefore say that it is hoped that licensing authorities would wish to endorse and support this natural progress and improvement in the industry. It is requested that the policy positively encourage, or at least state that the authority will give sympathetic consideration to, re-sites within the same locality and extensions.

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iv) **Enforcement**

8.25 They request that the policy includes wording along the following lines:

“The authority recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are recognised and resolved at the earliest stage, operators are requested to give the authority a single named point of contact, who should be a senior individual, and whom the authority will contact first should any compliance queries or issues arise.”

v) **Location**

8.26 In the event that the City Council adopt a policy regarding the location of premises, they suggest that the policy be supplemented to include the following words:-

“The Council will require evidence that the particular location of the premises would be harmful to the licensing objectives. The mere location of the premises near to for example a residential area will not in itself result in the application being refused.”

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9.0 Conclusions and recommendations

- 9.1 Gambling is an emotive subject with the general public. Whilst they are aware that it is very popular, there is high awareness and concern of its possible negative impact on people and families.
- 9.2 They understand that there is a large range of gambling available in Leicester yet no more than any other city and indeed far less than when compared to say Nottingham.
- 9.3 They all recognise the need for control and regulation and to date; feel that Leicester City Council have 'got it about right' and indeed the overall message is 'steady as she goes' with regards to the new policy.
- 9.4 The major areas of concern for the general public in terms of any increase in gambling are:
- How does the city measure the demand for gambling as there is an underlying concern that the provision of facilities creates demand?
 - That more resource needs to be put into supporting 'victims of gambling' and their families.
 - That with any increase in gambling provision (especially casinos) there is an underlying financial motivation, especially by the city Council and there is a need to demonstrate the wider economic impact argument for gambling on the community as a whole.
- 9.5 Of all the various forms of gambling, bingo is viewed differently to the others which are predominantly seen as being 'an end in themselves' whilst Bingo is seen as being far more a 'means to an end' namely as offering a social service of companionship and friendship especially to the elderly.
- 9.6 The resident's and business survey demonstrated that the City Council has overwhelming support in setting a gambling policy and 'policing' it by the very positive responses to certain attitudinal statements.
- 9.7 Likewise there is widespread agreement that supervisory staff must be CIB checked for the relevant offences.

1 Location

- 9.8 Businesses showed a different concern about location than did the general public who demonstrated a social impact concern whilst business concern tended to relate to impact on business. Current policy is again as seen as being 'about right' although some felt that any new Casinos should either be in locations such as Meridian Park and could form part of a Leisure complex.
- 9.9 For Bingo the key location issue was the availability of transport - both public transport and car parks.
- 9.10 Whilst the City Centre was the most popular choice for most forms of gambling provision, it was noted that the city centre is increasingly becoming a residential area.
- 9.11 The focus groups demonstrated a concern relating to the location of betting shops in housing estate shopping precincts whilst the industry body was able to

Report from SMSR Appendix 1

demonstrate effective control. Likewise the Constabulary raised no specific location issues.

2` No Casino Policy

- 9.12 The focus groups demonstrated that the provision of casinos were an emotive subject with the general public. This was confirmed in the survey where there was an overall majority of the general public in favour of a 'No Casino' policy (54%) whereas only 22% of business sector were in favour of it.
- 9.13 The general public felt that there are sufficient casinos in Leicester and that any lack of capacity should be absorbed in neighbouring Nottingham.
- 9.14 The industry bodies and the Constabulary all feel that Casinos are very well managed and controlled.
- 9.15 There is an increasing appeal of Casinos to younger people.

3 Door Supervision

- 9.16 Door supervision is seen as being essential although it is recognised that it comes in different forms and not necessary direct e.g. pubs are seen to be supervised by the staff. The major perceived weakness appears to relate to Family entertainment centres which are seen as attracting young persons and introducing them to gambling. This view was reinforced by the Constabulary.
- 9.17 The surveys showed that the current door supervision provision was adequate. That being said, from the focus groups there was a view that the City Council needs of have (and be seen to have) a regular 'random inspection' of such premises and its supervision.
- 9.18 Most saw CIB checks as being essential but needed to apply to RELEVANT offences.

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4 The Gambling Act statement

- 9.19 There is an overwhelming majority in favour of the policy as it stands from all sides, general public, the industry, industry bodies and the Police.
- 9.20 Most 'in the industry' feel the Council has 'got it about right' in terms of content and presentation although certain industry bodies want some technical additions (see section 8.0) including the ABB who want additional wording for re site applications and enforcement
- 9.21 From a general public's perspective, they recognise that it is a technical/legal document and rather than attempt to make it 'user friendly' it may be far more appropriate to produce a simplified summary version/pamphlet of it for general distribution, possibly with the Council Tax bill. Some focus group respondents felt that this would be another way of informing the public of another service that the Authority provides and help demonstrate it is giving 'value for money'.

Disadvantaged Groups

- 9.22 Most felt that the draft policy did not have any major adverse implications for any disadvantaged groups. This had two dimensions – the document and the policy. For the former there is the need to ensure those with eyesight impairment can read it? The latter is to ensure that the policy does not disadvantage or insult any group/gender/faith. Again it was seen that the production of a summary version available in Braille, large print and different languages would address most of these concerns.

5 Other issues and comments:

- 9.23 Whilst recognising it does not form a part of this consultation directly, an emerging issue from the focus groups for the city council was a view that the City Council should not be focusing on building new gambling facilities but rather on providing more leisure facilities for local people.

Recommendations

- 9.24 That Leicester City Council uses these consultation results as a method of demonstrating that the proposed gambling policy has been subjected to a rigorous programme of consultation.
- 9.25 There is a need to publicise the proposed policy that will also demonstrate the City Council's responsibilities in this area.

Location

- 9.26 The City Council needs to recognise the concerns of the general public when agreeing to the location of new gambling establishments especially with regard to residential areas and sensitive areas. There is a need to consider the location of any new casino at an out of town location.

No Casino Policy

Report from SMSR Appendix 1

- 9.27 Although there is a small majority of the general public in favour, over 10% are 'not sure' there appears to be a wide gulf between the general public and the industry and law enforcers. The general public see casinos in emotive terms which the industry and law enforcement agencies see the casino industry as perhaps the best organised/staffed of gambling providers.

Door Supervision

- 9.28 The general public, the industry and the Police all agree on the importance of Door supervision. Whilst much of it is self regulating e.g. pub staff monitoring fruit machines, there is a need to demonstrate to the general public that the city council monitors this especially with regard to Amusement Arcades which tend to attract youth. The ABB state that Bookmakers are policed by counter staff and ask for additional wording to be added.

Gambling Policy document

- 9.29 Most feel the policy and document are about right. Some industry bodies want small additions to including the ABB. The Authority should consider the provision of a short simplified version/pamphlet that could be circulated with the Council Tax bill. Disadvantaged group concerns could also be addressed through the provision of such a summary document being available in Braille, large print and differing languages.

Other Issues

- 9.30 That the Authority recognise the general public's concern over gambling and ensure that before additional gambling facilities are provided that they research the impact (and the benefits to the city) and ensure they are adequate safeguards/support mechanisms for those who 'fall under its spell'.
- 9.31 Whilst outside the remit of this consultation, a message emerging from the focus groups was that whilst gambling is an important industry in the city, there is a much greater need for other forms of family entertainment facilities.

Report from SMSR Appendix 1

Appendix

- 1 Questionnaire
- 2 Covering Letter
- 3 Focus group script

Report from SMSR Appendix 1



Gambling Policy Consultation 2006

Section A Location

The City Council seeks views on whether or not it should adopt a specific policy regarding the location of different types of gambling premises

Q1 How important do you think the locations of the following types of gambling premises are?

	Very important	Fairly important	Neutral	Not very important	Not at all important
Casinos	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Bingo halls	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Public houses with amusement with prizes (i.e. fruit machines)	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Family entertainment	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Betting offices	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

Q2 How suitable do you think the following locations are for the specific types of gambling facilities shown?

Casinos	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable
City Centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Local shopping centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Residential area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Other business / community area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Near sensitive locations such as school, places of worships etc	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Bingo halls	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable
City Centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

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Local shopping centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Residential area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Other business / community area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Near sensitive locations such as school, places of worships etc	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Public houses with amusements with prizes (fruit machines)	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable
City Centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Local shopping centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Residential area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Other business / community area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Near sensitive locations such as school, places of worships etc	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Family entertainment centres (amusement arcades)	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable
City Centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Local shopping centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Residential area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Other business / community area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Near sensitive locations such as school, places of worships etc	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Betting offices (bookmakers)	Very suitable	Fairly suitable	Neutral	Not very suitable	Not at all suitable
City Centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Local shopping centre	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Residential area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Other business / community area	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Near sensitive locations such as school, places of worships etc	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

Section B Policy on casinos

The Gambling Act 2005 states that a licensing authority may resolve not to issue casino licences. This would only affect new casinos, not those that already have a licence when the resolution takes effect. A 'no casinos' policy cannot be limited to certain areas. This means that if such a policy were introduced by Leicester City Council, it would apply to the whole of the city.

Report from SMSR Appendix 1

Q3 Do you think that the City Council should introduce a 'no casino policy'?

Yes

No

Don't know

Q4 Why do you say this?

Report from SMSR Appendix 1

Section C Door supervisors

The City Council intends to have specific requirements for door supervisors working at gambling premises, which may include the need to be licensed by the Security Industry Authority in certain circumstances. This is in recognition of the nature of the work in terms of searching individuals, dealing with potentially aggressive persons, etc. The City Council welcomes views on this matter.

Q5 How important do you feel it is to have door supervisors at the following premises

	Very important	Fairly important	Neutral	Not very important	Not at all important
Casinos	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Bingo halls	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Public houses with amusement with prizes (i.e. fruit machines)	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Family entertainment centres (amusement arcades)	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
Betting offices (bookmakers)	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

Report from SMSR Appendix 1

Section D Unlicensed Family Entertainment Centres

The City Council intends to adopt a Statement of Principles in relation to the conduct of gambling within unlicensed family entertainment centres.

Q6 To what extent do you agree with the following statements?

	Agree strongly	Agree	Neutral	Disagree	Disagree strongly
The applicant should set out the types of gaming that he or she is intending to offer	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
The applicant should be able to demonstrate that they understand the limits to stakes and prizes that are set out in regulations	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
That the gaming offered is within the law.	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

Q7 Do you think that the City Council should ask applicants to demonstrate:

	Agree strongly	Agree	Neutral	Disagree	Disagree strongly
A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
That the applicant has no relevant convictions (as set out in Schedule 7 of the Act)	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
That staff are trained to have a full understanding of the maximum stakes and prizes	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

Q8 Which of the following convictions (if any) do you think should be taken into account when recruiting staff for unlicensed Family Entertainment Centres?

Convictions for:	
Violence	<input type="text" value="1"/>
Dishonesty	<input type="text" value="2"/>
Sexual offences	<input type="text" value="3"/>
Certain motoring offences	<input type="text" value="4"/>
Other (please specify)	<input type="text" value="5"/>

Section E Other matters

The Gambling Act sets out certain matters that must be included in a Gambling Policy. However, the City Council welcomes views on the way the draft policy is written. In particular:

- is it easy to read and understand?
- would you prefer a document that is less detailed?
- would you prefer fewer references to the statutory guidance?

Report from SMSR Appendix 1

Q9 Do you have any other comments on the way the draft policy should be written?

Q10 Do you think that the draft policy could have any adverse implications for disadvantaged groups? (For example, on the grounds of disability, race, gender, age, religion, sexual orientation, social exclusion)

Yes

1

No

2

Don't know

3

Thank and close

Q11 If yes, please give details...

Report from SMSR Appendix 1



Greeting Name

Add1

Add2

Add3

Postcode

Id no

Dear Panel Member

On behalf of Leicester City Council I would like to ask for your help in completing a questionnaire.

The Council's Licensing department are required by the Gambling Act 2005 to publish a statement of the principles that it proposes to apply when exercising its functions as Licensing Authority. The research aims to evaluate specific aspects of the policy including security and location issues and whether or not to licence casinos.

The Council are also interested in hearing what you think about the document itself and we have therefore enclosed a copy to help you answer a few questions on the actual style of the document.

To ensure the consultation is independent and successful, the Council has commissioned Social and Market Strategic Research Ltd (SMSR) to help with the project.

SMSR have been asked to analyse the questionnaires and report the results. However, the responses that you give are completely confidential and the Council will only receive the overall results of the survey. Individual respondents will not be identified.

If you have any questions about this survey please contact myself (Darren Hornby) on our freephone number 0800 1380845.

I very much hope you will be able to take part and feel sure that you will find it interesting. Please return your questionnaire by Friday 28th July in the FREEPOST envelope provided.

Thank you very much for your help in advance.

Yours sincerely



Darren Hornby
Project Manager
On behalf of Leicester City Council

[Draft Interview Script](#)

Report from SMSR Appendix 1

1 Introduction

SMSR Preamble, purpose of research etc

2 Location

The Council are debating whether or not it should adopt a specific policy regarding the location of different gambling premises.

Generally, do you think this is something that can affect the levels of crime and disorder or association with crime and disorder?

Could it also make a difference in regards the protection of children and vulnerable people from being harmed or exploited by gambling?

The council have pinpointed 5 main types of gambling facility that it especially consider – these are Casinos, Bingo Halls, Public houses with fruit machines, Family entertainment centres (Amusement arcades) and betting offices.

Which do you think should be considered the most seriously in regards location?

Explore all 5 types of premises and their effect on crime / children and vulnerable people

Explore actual locations and reasons why

3 Door Supervision

The Council as part of the policy may consider the need for door supervisors again with the protection of children and vulnerable people and from preventing premises becoming a source of crime in mind.

Generally how effective would door supervisors be – in particular for the five types of premises mentioned earlier? Explore each one on their own merits

In what ways would they help achieve the objectives?

Or

Why would it not make much of a difference?

The Council would have specific requirements for door supervisors especially those working at bingo halls and casinos in recognition of the nature of the work – searching individuals, dealing with aggressive people etc

Explore any views on this matter – recommendations and reasons why

4 Casinos

The Gambling Act 2005 states that a licensing authority may resolve not to issue casino licences. This would only affect new casinos, not those that already have a licence when the resolution takes effect. A 'no casinos' policy cannot be limited to certain areas. This

Report from SMSR Appendix 1

means that if such a policy were introduced by Leicester City Council, it would apply to the whole of the city.

Should the Council introduce a no casino policy?

Would this help reduce or increase levels of crime and disorder?

What impact would this have from a police perspective?

Any other thoughts on this issue?

5 Gaming Premises

The Council intends to adopt a Statement of Principles in relation to the conduct of gambling within unlicensed family entertainment centres.

To what extent do you agree with the following statements?

	Agree strongly	Agree	Neutral	Disagree	Disagree strongly
The applicant should set out the types of gaming that he or she is intending to offer	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
The applicant should be able to demonstrate that they understand the limits to stakes and prizes that are set out in regulations	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
That the gaming offered is within the law.	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

Reasons why?

Do you think that the City Council should ask applicants to demonstrate:

	Agree strongly	Agree	Neutral	Disagree	Disagree strongly
A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
That the applicant has no relevant convictions (as set out in Schedule 7 of the Act)	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>
That staff are trained to have a full understanding of the maximum stakes and prizes	<input type="text" value="1"/>	<input type="text" value="2"/>	<input type="text" value="3"/>	<input type="text" value="4"/>	<input type="text" value="5"/>

Reasons why?

How much emphasis should the Council place on applicant requirements to show that there are policies and procedures in place to protect children from harm – thinking about the wider picture of general child protection not just protection from gambling. (Give examples such as CRB checks, training and handling of children in various contexts)

Report from SMSR Appendix 1

Thoughts on CRB checks and in particular which convictions should be taken into consideration?

How far should an organisation applying for a licence be investigated and what should and should not be taken into account?

6 The Policy

From a police perspective is there anything else that you would like to see included, especially in relation to the issues discussed today.

Do you think that the issues are going to be effective in regards the three licensing objectives?

Preventing crime and disorder

Ensuring that gambling is conducted in a fair and proper way

Protecting children and other vulnerable people

Was it easy to read and understand?

If no – why not?

Was there too much or too little detail?

Why do you say this?

Would you prefer fewer references to statutory guidance?

Do you think that the draft policy could have any adverse implications for disadvantaged groups? (For example, on the grounds of disability, race, gender, age, religion, sexual orientation, social exclusion)

Are there any other comments you would like to make?