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Sent: 10 May 2018 11:58
To: WRS Enquiries
Subject: Redditch - Consultation on Draft Revised Statement of Principles

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I have submitted representations in response to the consultation by another of the Worcestershire authorities. I respond to this as it is not clear that an objection to one consultation applies to them all. Further, an additional matter occurs to me that requires me to add to my earlier submission of 3 May. I have underlined the new element.

I have 2 comments:-

1. Whilst I have no prospective applicant in mind I have come across the suggestion elsewhere which is at 19.5 in your revised Statement that *'The Licensing Authority requires applicants for uFEC permits to provide a Basic Disclosure certificate issued by the Disclosure and Barring Service (DBS) within a period of one month before the application is made.'*

What happens if the applicant is a company?

That is not a circumstance that your policy seems to contemplate.

2. The LCCP and the way in which gambling premises have to be managed (I have in mind AGCs and Bingo premises) with detailed policies in place to identify the vulnerable and exclude them or enable them to exclude themselves means that they can be suitable in most areas without giving rise to problems. They are situated in town centres which are a gathering point for all members of the community and so their management has to take into account the likely presence of problem gamblers in town centres. I am not aware of a problem with Worcestershires gambling premises at the moment.

If, as seems to be implied, gambling premises are deemed inappropriate in areas where the vulnerable are most numerous, in town centres, then that would potentially make the current pattern of premises inappropriate.

In summary, I consider your proposed changes at section 10 will leave the Council to determine licence applications in accordance with the views of your 'public health teams' with insufficient regard being paid to the obligations placed on operators by the LCCP (Gambling Commission - Licence Conditions and Codes of Practice) and the way they conduct their premises. Further, I am concerned at the weight which it seems is to be accorded to the input of the 'public health teams'. It is to be noted that they are not 'Responsible Authorities' which suggests that one should be cautious about according undue weight to their input.

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