

**From:** Roger [REDACTED]  
**Sent:** 03 May 2018 13:56  
**To:** WRS Enquiries  
**Subject:** Gambling Act Policy consultation

I have received a copy of the above and am pleased to be a consultee.  
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.

Yours

**Roger Etchells FRICS**  
[REDACTED]

Roger Etchells & Company  
The Old Bank  
Kilwardby Street  
Ashby de la Zouch  
Leicestershire  
LE65 2FR  
Tel: [REDACTED]  
Mob: [REDACTED]