

Head of Environmental Health, Assets and Environment,
Tamworth Borough Council
Marmion House,
Lichfield Street,
Tamworth,
B79 7BZ

29th October 2015

Dear Sir

Consultation on Tamworth Borough Council's Statement of Principles – Gambling Act 2005

Coral Racing Limited is most grateful to be given the opportunity to respond to this consultation exercise. Coral was one of the first national bookmakers to be licensed under the Betting and Gaming Act of 1960, and so has been operating the length and breadth of the UK for over 50 years. Its premises comprise locations in the inner city, on the high street, in suburbs and in rural areas, and in areas of both high and low deprivation. It now operates 1850 betting offices across Great Britain, which comprise about 20% of all licensed betting offices. It is, therefore, a highly experienced operator.

Coral Racing Limited are broadly supportive of the document but provide feedback in terms of several areas regarding the new Risk Assessment section.

Your Statement correctly notes that the Board when considering applications are still required to 'aim to permit gambling' where this is 'reasonably consistent with the licensing objectives'. Please note that when judging applications, the Council should not take into account of any moral objections to gambling and most Council's include a sentence to this effect.

Risk Assessment

Coral Racing Limited recognise the requirement to supply risk assessments with future applications & variations following the consultation completion (requirement is from 6th April 2016) and are pleased to see this detail included within the Draft Statement.

Coral believe that the additional local risk assessment to be introduced with future premises licence applications from April 2016, should be a) to assess specific risks to the licensing objectives in the local area, and b) to assess whether control measures going beyond standard control measures are needed. In other words, there should be no requirement to list wide range of specific locations which are currently mentioned in your statement. Notwithstanding this, such locations if necessary would automatically be included with the operators risk assessment submitted when the application is considered.

We appreciate that a range of locations are included within Gambling Commission guidance to councils but wish to ensure that by inclusion in the risk assessment, there is no inference that such locations in close proximity to the licensed premises, are at greater risk of causing harm to the licensing objectives.

In order to clarify, Coral knows of no evidence that children coming from schools are gaining access to betting offices. Coral's general experience, in common with other bookmakers, is that children are not interested in betting, and in any case the Think 21 policy operated by Coral is adequate to ensure that under-age gambling does not occur in their premises. There are very many examples of betting offices sited immediately next to schools and colleges and no evidence whatsoever that they cause problems.



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Additionally, we are of the opinion that the proximity of the location of a betting premises in relation to supermarkets, other high street shops stated or associated leisure venues listed within your guidance, does not cause any greater risk in the attainment of the licensing objectives.

The reason for Coral's caution against making such perceptions, which we anticipate is similar to that of the other main bookmakers, is that it already operates systems which ensure that the licensing objectives are strongly promoted across its estate.

For example:

- Coral benefits from an operating licence granted by the national regulator, the Gambling Commission. Therefore, its corporate systems for the promotion of the licensing objectives have been approved by the Commission, which continues to exercise vigilance in this regard through inspections and examination of regulatory returns.
- Coral is subject to the Licence Conditions and Codes of Practice, which are effectively the national code of operation to ensure that the licensing objectives are promoted.
- It carries out health and safety risk assessments pursuant to its legal obligations. These assessments are shortly to be extended so that formal compliance assessments are conducted.
- It conducts risk assessments in relation to Exposure to Violence, Aggression and Conflict (EVAC assessments).
- It operates the assessment principles of the Safe Bet Alliance, the national code for safe premises. It was one of the architects of the code.
- It operates the ABB's Code for Responsible Gambling, and again was one of the architects of that code.
- It operates an extensive compliance manual, upon which all staff members are trained. Copies are available for your inspection if required.
- It contributes to the Responsible Gambling Trust, which seems to promote responsible gambling who in-turn contribute to GamCare, the national problem gambling charity.

The majority of council documents which are currently being reviewed, do cover this new area and have managed to consolidate their guidance into one or two paragraphs. We would caution against the council providing a long list of locations which must be risk assessed and instructions / templates for completion which are not proportionate to the styles of businesses we operate. However, as an established national operator, we will of course commit our best endeavours to completing the new requirements to your satisfaction.

Finally, within your Statement, on page 55 is the comment:-

'There has been concerns voiced in the media about increases in Fixed Odds Betting Terminals (FOBT) in deprived areas and the betting industry targets areas of deprivation.....'

It is helpful that you state on Page 56:-

'Recent enquiries with local betting premises in relation to the use of B2 or FOBT seems to show that there is no excessive use of the machines.....'

Coral politely advise Tamworth Council that irrespective of what may be read in the wider media, the facts are that we do not target deprived areas and would be happy to share our evidenced based analysis with the Council if they would like to view more insight of this topic.

If we can provide any further information to assist in this Draft Statement, we would be pleased to do so.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John Liddle', with a horizontal line underneath.

John Liddle
Director of Development – Coral Retail

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