



**GBG Licensing Group
By Teams**

25 April 2023

Attendees:

Chloe Millington (Buzz Bingo)	Paddy Whur (Woods Whur) Guest
Andy Tipple (Merkur)	Amanda Usher (Woods Whur) Guest
Felix Faulkner (Poppleston Allen)	Peter Hannibal (GBG)
David Lucas	Charlotte Meller (GBG)
Andrea Kiernan (Merkur)	

Apologies: Andrew Cotton, Andrew McQueen, Simon Reynolds

Item 1 Minutes from January 2023 meeting

1. Minutes agreed as an accurate record of the discussions.
2. Briefly discussed the White Paper with the latest expected publication date cited as 27 April. Once published GBG will issue a summary asap and will look to convene meetings with members to discuss next steps.

Item 2 Discussion on the Gambling Commission's current LCCP consultation,

3. Peter talked through the GBG's draft response to this [consultation](#) with the GBG's comments focusing primarily on the proposal to require operators to report any death by suicide of their customers to the Commission.
4. Some suggested amends were made including that the standard of proof required for a conclusion of suicide is now the civil standard i.e. "on the balance of probabilities", and adding a reference to the Regulators' Code, and it was noted that the media seems to focus more on online than land based gambling being a potential factor in suicides.
5. The draft has been circulated to members for comment and anyone making their own submissions are encouraged to share.

Item 3 GBG's Responsible Gambling Charter

6. Launched at ICE and endorsed by Gordon Moody, the GBG's Land Based Responsible Gambling Group is now looking at how members are meeting the Principles in the Charter. A benchmarking exercise will be circulated shortly for

members, to help identify good practice which can be shared and also any areas where help is required.

7. For legal firms it is anticipated they will meet 2 of the Principles as a minimum i.e. to have an employee's policy to support staff who have or develop problem gambling (in the say way staff policies exist for helping support drug/alcohol issues); and that relevant staff have undertaken some kind of responsible gambling awareness training.
8. Poppleston & Allen sometimes provide such training to their clients and so by default those staff also do the training.
9. GBG is working with GamCare to develop a pilot Responsible Gambling training module for B2B members which would also include call handling – more information will be circulated later in the year for those interested in being involved.
10. In terms of recruitment, it is a challenge for operators to explicitly state that they would not employ a self-excluder and it can be difficult to manage those who become SE whilst employed – as this could be deemed discriminatory/breaching human rights.
Action: GBG to explore getting some advice from an employment lawyer.

Item 4 Regulators' Code

11. GBG updated on its efforts to ascertain who now has ownership of the Regulators' Code. OPSS' remit has changed (previously it was BRDO) so that "*whilst OPSS is able support regulators with adherence to the principles of the Code through informal advice, we do not ensure that individual regulators adhere to the Code. The obligation to meet the Code rests with the relevant regulator when setting their policies and procedures as to the exercise of its regulatory functions*". Parliamentary Questions however suggest that the OPSS has a greater role, so we are continuing to engage with the Department for Business and Trade.
12. GBG is also engaging with the Regulatory Reform Group (RRG) given its recent publication of [The Purpose of Regulation](#) which identifies a number of issues with the UK's regulators.
13. PH updated on recent correspondence to DCMS Minister Stuart Andrew and Andrew Rhodes at the Commission regarding concerns over several research reports with inaccurate information particularly in relation to the scale of problem gambling rates, some of which have been funded from the regulatory settlement funding pot.
14. The Group discussed examples of LAs' public health teams citing problem gambling harm at licensing committee hearings as grounds to refuse applications– particularly LAs within the M25 and some further north e.g. Leeds/Wakefield, although the evidence base was often weak and not accepted by licensing committees.

15. Legal firms have also seen a huge increase in the use of additional conditions on gambling licences over recent years.
16. Assumptions that gambling premises cause an increase in crime are unfounded, with examples of the police benefitting from the CCTV footage captured by gambling premises to assist in unrelated crimes that have taken place in the road outside the premises.
17. [WalkSafe](#) are working with a number of GBG members to provide crime analysis evidence to assist with applications and are also offering other services such as safe havens.

Item 5 External Communications

18. GBG is developing an external comms plan and welcomes suggestions of legal publications and other channels which we could target with articles.
19. As part of the plan various initiatives with LAs are in train/planned including GBG members facilitating visits/training days for LAs and police; articles in the IOL's LINK and Journal publications; sessions at IOL events and hopefully some job shadowing during National Licensing Week.
20. The Group agreed that facilitating LA visits to gambling premises will be hugely beneficial as officers (and elected members) generally don't understand gambling or what to expect to see within gambling premises. Woods Whur indicated that Rank have done this in the past with LA officers and would be happy to be involved again.
21. Following positive feedback from this year's GBG Hub at ICE, the intention is to repeat it next year. The intention is to finalise plans much earlier to enable communications and invites to be issued more promptly. Current thinking is to have a LA focused day on the 3rd day, when its usually quieter, which would include giving tours around and looking at machines/other gambling equipment. The Group thought this was a good idea and could assist with targeting LAs accordingly.

Date of Next Meeting: 18 July 14.00 – 15.30

(Caveat – an earlier meeting will be convened once WP is published).