

A Progressive Partnership: GBG and IoL's joint efforts to revitalise high streets and improve gambling licensing



By The Gambling Business Group

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Over the past year, the Gambling Business Group and the IoL have been working closer together, building a dialogue not just on licensing issues but broader areas such as the revival of the UK's high streets and community projects. Peter Hannibal, GBG's Chief Executive, and Charlotte Meller, General Manager, reflect on the progress made and the work the two organisations can look forward to in the year ahead.

Q: It's been a year of closer engagement between the IoL and the Gambling Business Group. Where are we at with building a stronger and more proactive relationship on the two sides?

Peter Hannibal: One of the GBG's Strategic Aims is to be the industry point of contact for local regulators and we are delivering on that objective through the regular articles in IoL publications, being invited to speak at IoL regional and national events and even dealing with questions directly from LAs.

This all contributes to the growing partnership between the two bodies and an ever-increasing understanding.

It has been a fascinating year of insight into the local authority processes, and I will say, without a shadow of a doubt, that this relationship between the IoL and GBG is one of the most important - and progressive - engagements we have. Alongside DCMS and the Gambling Commission, working with the IoL is a vital partnership for us.

Q: You will be back at the IoL's showcase National Training Conference. What's your plan for that?

Charlotte Meller: It's must-do event for GBG. Where else will you get up to 400 licensing officers from around the country together under one roof for a few days?

It also offers a slightly wider scope for engagement. Last year, for example, we were joined by a GBG Member, Crown Leisure, who presented with us. Crown spoke to officers about the importance of 'their family' - that's how they describe their customers - and how crucial it is to look after them.

There is a real personal touch to how businesses like Crown engage with their customers and some of the human stories they shared last year was a reminder of what actually happens on a day-to-day level between companies and clients which we just do not hear about.



This year we are delighted to be joined by two more GBG members who will be showcasing how their products help make gambling premises safer for both staff and customers and demonstrating the systems that deliver the data which is available for licensing authorities to access when undertaking premises visits.

GBG is recognised as the home of technical standards - our members' expertise is unparalleled, so we have been able to set very high standards - and with very high expectations too.

When you look at the pioneering work in the industry, on data and age verification for example, we are witnessing a real step change in the protection of players, not just here but across the world.

British manufacturers are leading the way in this area, and that is an important message we want to convey to our licensing authorities.

And where better than to talk about these developments than at National Conference.

Q: We know that the GBG and the wider industry have issues with the Gambling Commission's changes in calculating gambling behaviour. It is an area of huge sensitivity on both sides, not least for councillors who are

very conscious of keeping that balance between protection and progression. GBG has been extremely vocal on the regulator's statistics; can you explain your position?

Peter Hannibal: I think this question is exactly the measure of how far we have come with our relationship with the IoL - we can be open and honest about our stance.

There is real concern about the Gambling Commission's new calculus for evaluating player behaviour. The GBG discussed those concerns at the National Licensing Forum, chaired by the IoL, just before the new survey was published and has subsequently stressed both the regulator's caveats and the industry's concerns.

The Commission's Gambling Survey for Great Britain (GSGB) - whether we like it or not - shapes perceptions and policies. And there is already evidence that these changes are starting to do that with immeasurable damage.

GBG and the industry in its entirety are not alone in this view.

The Government is concerned about the reliability of the new methodology and even the Commission itself has accepted the concerns of its own independent assessor

who stressed the point that the data is unreliable. The Commission's assessor went as far as to say that the GSGB under its new criteria is untrustworthy, figures must be read with caution and urged the Commission to adopt seven new recommendations to salvage it.

Where we stand is simple: the new statistics, particularly on problem gambling, are currently unreliable, should not be used as a comparative and those seven recommendations must be taken on board immediately by the Commission.

From an IoL position, what we hope is that the LAs will exercise the Commission's stipulated cautions when discussing the data with Elected Members or considering using it in Policy Statements.

And we are hopeful that the warning from the Commission to all stakeholders in the gambling arena and the media is heeded: these statistics must not be misused and misrepresented. They are not comparable to previous surveys and must not be extrapolated across the population.

Q: This is a very important year for the gambling industry with the Gambling Review set to be a central topic over the next 12 months or so. Will that see more joint working between the IoL and GBG?

Peter Hannibal: I think so. Although it might be longer than either we or the IoL would wish.

The planned implementation timetable for the changes set out in the Gambling Act Review was thrown out the window with the General Election.

It has led not only to an extended period of uncertainty for the trade, but also for local authorities who have had to review their Gambling Policy Statements ahead of a new three-year policy coming into force at the end of January 2025, without knowing what the new changes will look like.

As we progress forward with the new Government's priorities, there will inevitably be a need for guidance and training for licensing authorities from the Gambling Commission.

However, GBG members can also help with that through offering familiarisation visits to premises to actually show officers what some of the changes look like in practise.

The current 80:20 machine ratio rule, for example, isn't always fully understood by LAs and so it's likely

that whatever changes are made to machine ratios in AGCs and bingo premises will be equally challenging, especially if device types are being defined. This kind of change is better demonstrated in situ in a premises, and we hope that LAs will take up the offer to visit GBG members' premises when the proposals are implemented.

Q: You have been considering ways of developing a more consistent process for licensing visits. What ideas have you got on this subject?

Charlotte Meller: The Commission published the Licensing Authority statistics for 2023/24 in July. At the time of publication only 330/350 licensing authorities had responded - 163 of those LAs hadn't undertaken any visits during 2023/24, with a further 13 only visiting pubs/clubs and not premises with a gambling licence.

Given that gambling premises annual fees should cover the cost of inspections, it's fair to say there is some concern that around 50 percent of LAs have not undertaken visits and we need to understand why.

Some will say it's because the fee is insufficient - in which case the proposed increase in fees that LAs can charge should result in more/all LAs undertaking inspections in future.

But, if it's not down to funding then it's important that we dig deeper: why have so few visits taken place?

One suggestion is that the LAs have a risk rating approach to inspections which means that gambling premises are not visited annually.

If this were the case, then that's excellent news as it would confirm that LAs acknowledge that the industry is the most regulated and monitored on our high streets.

Even so, we should still explore this a little more.

It could, for example, be because they don't receive complaints about gambling premises - which is usually a trigger for a visit to a business, irrespective of the industry.

That, again, would be great news too. But if that's the case, we have to ask the question: why are we facing so many objections lodged in planning applications for gaming and gambling premises?

Whatever the reason for the inspection numbers, we have started exploring with IoL a more user-friendly approach to LA inspections. The suite of templates and

guidance hosted by the Leicester and Leicestershire Enterprise Partnerships need a substantial update - but is a paper form the right method? Are there technological options that would be better suited for LAs and how can the industry assist in the process? That's an important area for discussion between our two organisations.

Q: There are welcome reports of gaming, gambling and leisure businesses investing hundreds of millions of pounds into bringing shuttered shops back into operation on the UK's high streets. This revitalisation programme is a key tenet of GBG's strategic aims, so how can we make this regeneration work more effectively?

Peter Hannibal: Visitors to gambling premises will rarely go just to the betting shop or arcade. There will be linked visits to other businesses in all sectors on the high street, increasing the footfall to those premises. Gambling premises contribute to the diversification of the offerings on the high street and provide employment opportunities.

And they are wholly immersed in community activities.

Given the money invested in security in their premises, it's not surprising that many gambling operations also support "Ask for Angela" whilst others are recognised as "safe havens" on the WalkSafe+ app.

They are as much the "eyes and ears" of the high street as pubs and other retail premises.

Most importantly, however, they have been bringing shuttered shops back into use up and down the country for many years - the high streets need this investment, especially now when we are entering another period of austerity.

But, driving sustainable growth can only be achieved through partnership working - and that's not just with the IoL and GBG, but with all those with a vested interest in sustaining the high street - from the hospitality and retail sectors to the local regulators and police. We were really pleased to have the Kate Nicholls, Chair of IoL attend the GBG Board meeting in October to explore regeneration opportunities in more detail.

Q: You have earlier opened the door to a slightly thorny issue of planning application objections and rejections. GBG has been an advocate of a more consistent procedure drawing attention to the number of rejections over the year, many of which win on appeal. You believe there's

a process in which we can overcome this scenario and avoid increased costs and delays to reviving shuttered properties and bringing more jobs to high streets. Explain it to us?

Charlotte Meller: First of all, it has to be recognised that gambling premises are one of the most highly regulated businesses on the high street, with a dual licensing system, extensive requirements around anti-money laundering and preventing crime, and with the protection of consumers at the heart of everything they do.

And, as mentioned earlier, there were relatively few visits undertaken by LAs during 2023/24 - 2,194 in total and very few complaints.

Last year we welcomed the publication of the LGA and the IoL's Training Standard for Licensing Committee Members which set out the out basic requirements and additional development opportunities for those Committee Members considering licensing applications. It suggests stakeholder engagement including:

- Occasionally participating in visits with licensing officers in the nighttime economy, and,
- Meeting with local licensees to understand the challenges they face

We are not aware such advice exists for Members of Planning Committees - but we believe it should.

Whilst we are all clear that planning and licensing should not exceed boundaries between their respective regimes, it would be beneficial for Planning Committees to equally consider the stakeholder engagement suggested by the LGA and IoL.

Gambling licensing and planning officers would benefit from building working relationships and communication channels, if not already in place, to share information about gambling premises. We know this has been put in place in some councils and is working effectively.

Such engagement would address the small but increasing number of examples of "inconsistent and lack of joined-up decision-making".