

## Guidance to Licensing Authorities Part III - Enforcement and Compliance, principles to be applied

Consultation document, November 2006

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### 1. Introduction

1.1 This document sets out the main policy thinking that will form the basis of the third part of the Guidance to Licensing Authorities: Enforcement and Compliance. The Guidance will set out the Gambling Commission's views on:

- the principles that Licensing Authorities should adopt in developing their compliance and enforcement practice;
- the division of responsibilities between the Gambling Commission (the Commission) and Licensing Authorities in enforcement and prosecution. It should be noted that Licensing Authorities are not able to institute criminal proceedings in Scotland. They will refer cases where there has been a breach of the Act to the Procurator Fiscal;
- the exchange of information between Licensing Authorities and the Commission; and
- the role of the police in the enforcement and compliance framework.

1.2 In summary this consultation document proposes that:

- the administration and regulation of permits, small society lotteries and temporary permissions for gambling be undertaken by Licensing Authorities;
- the factors to take into account when determining the agency that will take the lead on enforcement are the nature of the breach; the seriousness of the breach; the frequency of the breach and the enforcement action that is available;
- generally Licensing Authorities take the lead in enforcing premises licence conditions, dealing with breaches of premises licence conditions, and investigating and prosecuting less serious or significant incidents of illegal gambling; the Commission will lead on enforcement of operating licences and personal licences, and, where they have the necessary powers, on the investigation and prosecution of illegal gambling of regional or national importance. Where non-gambling offences are also involved a multi agency approach may be appropriate. Licensing Authorities, the police and Commission should use local consultation arrangements to agree priorities and who should lead on which issues.

1.3 This document proposes a number of options on which Commission is seeking views:

- options for the principles by which gambling premises are inspected by Licensing Authorities with the recommendation that Licensing Authorities have a co-ordinated approach to premises licence inspection; and
- options for the exchange of information are proposed with the recommendation that information that may result in enforcement action is exchanged before such action is taken.

1.4 The Commission is committed to full and open consultation and would welcome comments on this document. This is a six week consultation period in order that the final document can be produced as early as possible as requested by licensing authorities. The consultation period will close on **22 December 2006**. Please see section 6 for details of how to respond.

## 2. Underlying principles

2.1 For the purposes of this document regulatory action would include informal or formal warnings and licence reviews, issue of simple cautions (warnings) or, in England and Wales only, the prosecution of an offence under the Act. The main objective of the compliance process will be to ensure compliance with the three licensing objectives, the general licensing conditions (including mandatory and default conditions), specific licence conditions and any applicable codes of practice. Enforcement can be defined as the criminal or regulatory investigation process which may result in either the laying of criminal charges or the imposition of a regulatory sanction.

2.2 The approach we propose is similar to the approach adopted by most Licensing Authorities in relation to liquor licensing; that is a risk based approach using risk to the three Gambling Act licensing objectives as the main determinant. These are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- ensuring that gambling is conducted in a fair and open way; and
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

2.3 Both the Commission and Licensing Authorities must have regard to the three licensing objectives. However, the Commission will generally concentrate on the way in which gambling is provided while Licensing Authorities will concentrate on issues related to the premises themselves as well as being responsible for issuing permits, temporary use permissions and the registration of small lotteries.

2.4 All agencies with inspection and enforcement powers - the Commission, Licensing Authorities and the police - will be more effective if they exchange information and coordinate efforts and the Act provides for the exchange of such information in Section 350 and Schedule 6.

### **Risk based assessments**

2.5 The Commission is taking a risk based approach to compliance and enforcement; this was set out in its consultation document *Licensing Compliance and Enforcement* which was issued in May 2006. The basis of the approach is to assess when and where to take action depending on the assessment of how likely it is that the licence conditions or codes of practice may be breached and with what impact. We believe that this approach should be adopted by Licensing Authorities.

2.6 Many Licensing Authorities already adopt a risk based approach to other areas where they have responsibilities e.g. alcohol licensed premises, taxi licensing or food safety.

2.7 It is proposed that Licensing Authorities adopt:

- a risk based approach to compliance and enforcement in respect of the permits and licences they issue;
- the risks to the three licensing objectives as the basis of compliance activity for premises licences and relevant codes of practice, Commission Guidance and local licensing statements; when undertaking compliance activity in relation to permits licensing authorities may consider such matters as they think appropriate in addition to any code of practice issued by the Commission under section 24 of the Act; and
- as the starting point for the risk assessments a review of existing records including police reports on premises, any records that the Authority may have in relation to

alcohol licences and information held by trading standards and/or environmental health colleagues. This should inform the pattern of visits to premises planned in connection with the Authority’s other functions or when reacting to complaints. After any visit undertaken, a licensing authority should review the risk assessments with a view to revising the criteria for inspection of premises. Complaints and comments about gambling premises will also inform the general risk ratings of premises.

**Consultation Question 1.**

Do you agree with the approach proposed for risk based assessments?

**Permits**

2.8 The Act introduces a range of permits for gambling which are granted by Licensing Authorities. Permits are required when non-licensed premises provide a gambling facility but either the stakes and prizes are very low or gambling is not the main function of the premises. The permits regulate gambling and the use of gaming machines in a specific premises. The Commission has no specific powers to take action over the misuse of permits other than the general power of prosecution of illegal gambling.

2.9 Licensing Authorities will also be responsible for receiving notifications, from owners of alcohol licensed premises, that they intend to exercise their automatic entitlement to two gaming machines in each premises under section 282 of the Act.

2.10 Licensing Authorities may only grant or reject an application for a permit. Licensing Authorities may not attach conditions to a permit. However the holders of club gaming permits, club gaming machine permits or alcohol licensed premises permits must abide by Commission codes of practice on the location and operation of gaming machines issued under section 24 of the Act and Licensing Authorities can take into account matters set out in the relevant paragraphs of Schedules 10 to 14 of the Act.. The Commission will be issuing such a code of practice on the location and operation of machines and is currently undertaking a consultation on the code. Holders of permits are not required to have an operating licence issued by the Gambling Commission. In all cases, a permit cannot be granted for a premises which has been issued with a valid premises licence.

2.11 The Act gives Licensing Authorities in England and Wales the power to prosecute if a gaming machine is made available for use in contravention of section 242 of the Act.

**Consultation Question 2.**

The proposed approach is for the Licensing Authority to lead on the regulation of the permits that it has issued. Do you agree with this approach?

**Consultation Question 3.**

What types of issues in relation to the use of permits do you anticipate will arise?

**Small society lotteries**

2.12 Licensing Authorities are responsible for registering small society lotteries that operate in their area. Once registered these become exempt lotteries under the Act. These are lotteries promoted on behalf of a non-commercial society which is established and conducted for:

- charitable purposes; or
- the purpose of enabling participation in, or of supporting, sport, athletics or a cultural activity; or
- any other non-commercial purpose other than that of private gain.

2.13 A lottery, or series of lotteries, is small if the total value of tickets put on sale in a single lottery is £20,000 or less and the aggregate value of the tickets put on sale in all the lotteries

in a calendar year is £250,000 or less. Where tickets for a single lottery exceed £20,000 or the aggregate value of tickets in a year exceeds £250,000, a licence will be required from the Gambling Commission.

**2.14** Licensing Authorities will be responsible for ensuring that the provisions of Schedule 11 of the Act in respect of all exempt lotteries are adhered to.

**2.15** The Act gives Licensing Authorities in England and Wales the power to prosecute offences relating to the promotion and facilitation of non-exempt lotteries, misusing the proceeds of a lottery and breaching the conditions of a small society lottery. The Commission has no specific powers in relation to small society lotteries.

**Consultation Question 4.**

It is proposed that Licensing Authorities lead on all aspects of compliance and enforcement of the small society lotteries they register. Do you agree with this approach?

***Temporary Use and Occasional Use Permissions***

**2.16** The Commission has no specific powers in relation to temporary permissions for gambling. It is the function of Licensing Authorities to record applications for temporary permissions to provide gambling facilities in the form of temporary use notices and occasional use notices.

**Consultation Question 5.**

It is proposed that Licensing Authorities take full responsibility for the regulation of such notices and ensure compliance with the provisions of the permissions. Do you agree with this approach?

***Premises Licences***

**2.17** Premises licences are issued by local Licensing Authorities to regulate where gambling takes place. They ensure that the premises are suitable for gambling. To be granted a premises licence the applicant must hold a valid operating licence issued by the Commission. The premises licence must comply with the Act. These licences are transferable to another operator.

**2.18** The inter-relationship between the operating licences issued by the Commission and premises licences issued by the Licensing Authorities, and the respective roles of the enforcement agencies (the Commission, Licensing Authorities and the police) is the basis for the rest of the consultation document.

### 3. Premises licences compliance

3.1 While enforcement is the regulatory or criminal investigation process which may result in either the imposition of a regulatory sanction or the laying of criminal charges, the compliance process involves gambling operators, individuals working in the industry at all levels, Licensing Authorities and the Commission. It is aimed at ensuring compliance with all aspects of regulation (the licensing objectives, licence conditions and codes of practice).

3.2 This must be primarily a collaborative process, and the effectiveness of the regulatory regime for the gambling industry will depend on the establishment and maintenance of an open, cooperative and effective relationship between operators, individuals, Licensing Authorities and the Commission.

3.3 The starting point is that the primary responsibility for compliance by any organisation subject to regulation lies with that organisation's senior management and not the regulator. It is the Commission's role, through the operating and personal management licences, to ensure that senior management have adequate systems and controls in place to ensure that their business does not pose a regulatory risk, that they are aware of their responsibilities and are carrying them out effectively. The incentive for operators is that better compliance will result in less regulatory intervention.

#### *Inspection visits*

3.4 Premises licences will be granted by Licensing Authorities and may authorise the provision of facilities for casinos, bingo, betting (including on tracks), adult gaming centres and family entertainment centres.

3.5 Except in the case of tracks (where the occupier of the track who gets the premises licence need not be the person who actually offers the gambling) premises licences may only be issued to people with a relevant gambling operating licence issued by the Commission.

3.6 Section 167 and 168 of the Act provides that default and mandatory conditions may be attached by the Secretary of State or Scottish Ministers to all, or a class of, premises licences. It also provides, at section 169, that Licensing Authorities may attach conditions to individual premises licences. Part 9 of the Guidance to Licensing Authorities, which was issued in April 2006, suggests what conditions might be considered in relation to each type of licence.

3.7 The Commission has a legitimate interest in what happens in premises as the operator's licence conditions require that the businesses' policies developed centrally are translated into practice at the point of interaction with the customer. To this end the Commission's compliance regime contains elements of random and programmed premises inspections based on the risks to the operating licence conditions, codes of practice and the licensing objectives.

3.8 The Act gives Licensing Authorities, the Commission and the Police parallel powers of inspection in respect to premises. In theory holders of premises licences could be subject to inspections from both the Commission and the Licensing Authority as part of their risk based compliance programme and the potential for over-regulation exists. We will need to ensure, to the extent that is feasible and cost-effective, that there is no duplication with the relevant bodies visiting the same premises within a short space of time apparently to check the same or similar issues. We will consider the best ways of reducing duplication.

3.9 We have identified a range of options for the principles by which gambling premises are inspected by Licensing Authorities. These are:

**Option 1.** A proactive approach. This would involve Licensing Authorities inspecting all premises in their area. While this would be risk based, all premises would be visited on a regular basis, with gambling premises that present more risks being subject to more frequent and intrusive inspections.

**Option 2.** A reactive approach. Licensing Authorities would only undertake an inspection in response to a complaint, information or intelligence that the premises are at risk of breaching the licence conditions or codes of practice. Generally this refers to the risk of a breach of a premises licence, although on close inspection the breach may be in respect of an operating or personal licence, in which case it should be handed to the Commission for further investigation. The authority would be reliant on third-party information to initiate an inspection.

**Option 3.** A randomised approach. Licensing authorities would undertake unannounced visits to licensed premises. This approach could result in premises which are causing concern not being visited and excellent premises being visited more often.

**Option 4.** A coordinated or multi functional approach. This approach is being tested by the Department for Trade and Industry's (DTI) retail enforcement pilot study. Local Authority officers (including those employed in a licensing function) may visit gambling premises for a range of regulatory reasons, for example in relation to an alcohol licence, health and safety regulation or in response to noise nuisance. The officer, whilst on a visit for other purposes, could also check that the gambling premises licence conditions or code of practice attached to a permit were not being breached. Similarly, if a complaint was received that a gambling premises was in breach of the Act the officer investigating the complaint could ensure that other licences issued by the authority and regulations were being adhered to while conducting any visit to the premises.

**Option 5.** A combined approach. Licensing Authorities would develop a range of options dependent on the risk assessment model that they adopt.

**The Commission recommends that the fourth option is developed in the long term, subject to the outcomes of the DTI pilot.**

3.10 The Commission will undertake visits to premises in accordance with its risk model to ensure compliance with the Operating Licence, for example to ensure that the policy and procedures adopted by licence holders are translated into appropriate transactions with customers. Most Commission inspections will be programmed and the local licensing authority will normally be invited to offer any observations it has on the specific premises in advance of visits.

**Consultation Question 6.**

Which of the approaches in paragraph 3.9 do you think are suitable for Licensing Authorities to adopt and why, and what factors should they take into account in developing their model?

**Information**

3.11 We propose that Licensing Authorities should provide advice to all those who make enquiries, about the legal responsibilities of those involved in providing premises or holding permits for gambling, whether or not they hold a licence or a permit.

3.12 Enquiries about operating or personal licences should be referred to the Commission or its website.

3.13 The Commission will develop information sheets and guidance on specific aspects of gambling law and technical assistance, e.g. on types of machines.

3.14 Further details on the Commission's proposed approach to compliance may be found in our consultation paper on Licensing, Compliance and Enforcement (issued May 2006).

**Consultation Question 7.**

Do you agree with the proposed approach to information exchange?

## 4. Enforcement

### *Regulatory Sanctions*

4.1 If a premises licence or permit holder is found to be at risk of breaching or in breach of a premises licence condition, a code of practice attached to a permit, or otherwise committing an offence under the Gambling Act, then the Licensing Authority may take enforcement action against that licence or permit holder. Such enforcement action may take the form of regulatory action, e.g. informal or formal warnings and licence reviews, issue of simple cautions (warnings) or, in England and Wales only, the prosecution of an offence under the Act.

4.2 Under these circumstances informal action may include: taking no action; giving verbal advice; giving written advice, verbal warning or a written warning. Formal action would include interviews and letters under PACE, review of a licence, simple caution and prosecution.

4.3 If the matter relates to a premises licence, then it may be that the particular circumstances give rise to the possibility of breaching the conditions of both a premises and an operating licence. In this circumstance the Commission will generally take action (which might include prosecution but would normally be lesser regulatory action) following discussion with and advice from the Licensing Authority, against the operator tackling both aspects. But there may be occasions on which Licensing Authorities are better placed to take the lead, particularly where there is a breach of premises licence condition that is confined to one authority area and is a particular priority for that area or where the risk of, or impact of, any operating licence breach is not particularly serious; or there are other matters that it also wants to take action on outside of the licensing objectives, e.g. health and safety.

4.4 The Licensing Authorities will take the lead if there is a possibility of a breach or an actual breach of a permit, as the Commission does not have powers to take any action about permits other than the general power of prosecution of illegal gambling.

4.5 Section 197 of the Act requires Licensing Authorities to inform the Commission when a review into a premises licence is begun, either as a result of a complaint or if initiated by the Licensing Authority itself. The Commission will therefore be able to provide an input into any review and will receive the outcomes of the review. Regulations will be issued by the Secretary of State that set out the procedures for reviews.

4.6 Where considered appropriate and necessary, any case that involves offences other than gambling offences should be referred to the appropriate external enforcement agency (e.g. Police, Advertising Standards Authority, Trading Standards etc.).

4.7 We propose that the factors to take into account when determining the agency that will take the lead on enforcement matters in relation to permits, temporary use notices or breaches of premises licence conditions are:

- the powers available in the Act; only Licensing Authorities will be able to take administrative action (suspensions, revocations) in relation to premises licences and permits;
- the nature of the breach or risk of breach; if it involves permits, temporary use licences or breaches of premises licences conditions with essentially local impact the local Licensing Authority will normally deal with them;
- the seriousness of the breach or risk of breach; for example where the breach appears to be widespread or stemming from systemic failures on the part of the operator then the Commission will generally take action. The Commission will also generally take action if the offence is high impact, if there is nationwide deterrence value of enforcement action or if the case will establish a precedent. As noted above the Commission will be notified if the Licensing Authority starts to review a

premises licence and so will have the opportunity to comment and contribute to the review;

- the geographical impact of the breach; for example if there is a regional element to the breach, e.g. a number of pubs offering a particular type of unlicensed gambling it may be appropriate for Licensing Authorities to co-ordinate their activity and liaise with the Commission on the regulatory action to be taken;
- the frequency of the breach or risk of breach; in simple terms a one off event will generally be dealt with by the Licensing Authority. Repeat offences, or offences in several premises owned by the holder of an operating licence suggesting systemic breaches of licence conditions, will generally be dealt with by the Commission;
- The enforcement action that is available.

4.8 As a rule of thumb if the Licensing Authority discovers a breach of a premises licence condition or permit in the course of other regulatory activity, it is expected that it will deal with the case. However when formal enforcement action in relation to suspected breaches of a premises licence is to be taken by a Licensing Authority it should inform the Commission that it is taking such action. This will allow the Commission to comment if it considers it necessary to do so. It will be for the Commission to respond promptly to the notification of the intention to take action, it is not expected that the Licensing Authority will wait for agreement from the Commission before taking action.

4.9 If the Commission is preparing a case against an operator and would prefer the local Licensing Authority not to act, the Commission will advise the Licensing Authority that it would prefer the Licensing Authority not to take any action against that operator without prior consultation with the Commission. The Commission will inform the Licensing Authority of the reasons why it does not want it to take action.

#### Consultation Question 8.

Do you agree with the proposed approach to taking forward regulatory sanctions?

### Prosecutions

4.10 The Act gives Licensing Authorities (in England and Wales), the police and the Commission the power to prosecute (among other offences) the offence of using premises for gambling without the requisite permissions. While in exceptional circumstances e.g. repeated deliberate breaches of premises licence conditions, licensed operators or permit holders may be prosecuted without any prior regulatory action (such as warnings, suspension or revocation of licence or removal of permit), most prosecutions will be against those illegally providing gambling without a licence or permit.

4.11 Licensing Authorities are not able to institute criminal proceedings in Scotland. They will refer cases where there has been a breach of the Act to the Procurator Fiscal.

4.12 Normally the Commission or the Licensing Authority would decide when to involve the police rather than the police initiating any action. Examples of where we propose to involve the police include:

- when non-gambling offences are discovered, e.g. large scale theft and other serious crime which extends beyond the reach of licence conditions;
- assistance with Commission investigations e.g. enquiries in to other criminal activity.

4.13 There is a distinction between those who conduct gambling operations under a licence or permits but breach the conditions of their licence or permit and those who seek to profit from providing facilities for gambling without a licence. While both situations result in unlawful gambling the latter situation will generally be considered more serious.

**Consultation Question 9.**

Do you agree with the proposed approach to prosecutions?

***Illegal gambling***

4.14 The Commission views the prevention of illegal gambling as an enforcement priority. Combating illegal gambling is also of benefit to the licensed community as the provision of illegal unregulated gambling has an impact on the reputation of the industry as a whole. Those engaged in illegal gambling should expect to be subject to the criminal investigation and prosecution process.

4.15 The Commission will normally take the lead in prosecuting the offence of providing facilities for gambling where it is committed in the context of illegal gambling which appears organised and has a potentially national or regional impact; or where there are deliberate, reckless or significant breaches by a licensed operator.

4.16 The expectation is that Licensing Authorities will take prosecutions against those providing or facilitating illegal gambling i.e. gambling without a licence or permit, where the criminality is contained in one premises.

**Consultation Question 10.**

Do you agree with the proposed approach to illegal gambling?

***Breaches of licences***

4.17 For the licensed industry there are a range of compliance and regulatory tools to ensure that licence holders remain compliant. Enforcement is a highly effective method of ensuring regulatory compliance and deterring regulatory breaches. Therefore the Commission will undertake enforcement cases against those licensed operators and individuals who fall below the required regulatory standard or who fail to take effective remedial action to correct regulatory failings. In serious cases this will mean regulatory or criminal proceedings that may ultimately result in loss of the licence and therefore expulsion from the industry.

4.18 Before commencing criminal proceedings against a licensed operator or his staff without a prior premises licence review (which would have alerted the Commission), the Licensing Authority should consult the Commission as it may be that there have also been breaches of Operating and/or Personal licences or breaches for example in other parts of the country.

4.19 If a particular breach is committed by a large national or regional operator or has wider implications for the gambling industry as a whole then the Commission may wish to take primacy. Under these circumstances the Commission will discuss who should take the lead on a case by case basis.

4.20 In exceptional circumstances, where a Licensing Authority considers that enforcement action is justified and would normally take primacy, but feels it does not have sufficient investigatory powers or resources to deal with a relevant breach of the Act, then it should refer the matter to the Commission who will consider whether or not it can either assist the Licensing Authority by providing resources/expertise or take primacy in the investigation and prosecution of that breach. The Authority should contact the Commission's Intelligence Unit in the first instance .

4.21 In the course of an investigation into a breach of the licence conditions or codes of practice, the Licensing Authority may find that other non-gambling offences are being committed on the premises, e.g. drugs offences or handling of stolen goods. Under these circumstances a multi-agency approach involving the police and the Commission is essential.

**Consultation Question 11.**

Do you agree with the proposed approach to dealing with licence breaches?

## 5. Information exchange

5.1 The Gambling Act relies on a network of agencies to ensure that the licence conditions or codes of practice are not breached and to pursue offences under the Act. So that the network can operate effectively, the Act, at section 350 and schedule 6 allows the exchange of information between the responsible authorities and the Commission encourages Licensing Authorities to inform it of any information or intelligence it receives on unlawful gambling or potential breaches of the licences issued under the Act.

5.2 The Act places obligations on the Licensing Authorities to provide information to the Commission in relation to premises licences issued (and any variations to those licences), temporary use notices, registered lotteries and on permits issued for club gaming, club gaming machines, pub gaming machines and prize gaming.

5.3 Certain actions under the Act, such as the initiation of a licence review, will trigger an exchange of information between the Licensing Authority and the Commission.

5.4 In developing a risk based approach the Commission will need to rely on information or intelligence from other agencies it works with including Licensing Authorities. The Commission will from time to time seek specific and general information (for example on the prevalence of bingo in pubs or on the pattern of requests for more than two machines in licensed premises) from Licensing Authorities. Unsolicited information from all sources, including licensing officers, is welcome and will be evaluated and considered.

5.5 The Commission wishes to develop good working relationships with Licensing Authorities and to encourage them to exchange information with neighbouring Authorities where appropriate.

5.6 Local Authorities (which are wider than Licensing Authorities) are likely to be the source of much information about illegal gambling and potential breaches of operating and personal licences that will be picked up through other activities, such as their role in issuing other licences. Examples include the illegal supply of machines to private hire vehicle offices, illegal card rooms in cafes or unsupervised use of machines at a track.

5.7 The Commission has considered three options for the exchange of information between the Commission and Licensing Authorities. In addition Licensing Authorities are encouraged to contact the Commission for advice where that might assist them. The three options are:

**Option 1.** Any information of a breach or potential breach of the premises licence conditions, licence codes of practice or permits should be forwarded to the Intelligence Unit of the Commission. Similarly any information on the actions of operators will be forwarded to the Licensing Authorities who have issued premises licences to that operator. At present it is difficult to know how much information will be exchanged and whether this will be useful.

**Option 2.** Before any formal action is taken against the holder of a licence (of any type) details of the alleged breach will be sent to the Commission or Licensing Authority as appropriate. This will ensure that operators in breach of a licence will not be subject to double jeopardy. Also if the Commission is informed that one operator is being investigated for similar breaches by a number of authorities it may co-ordinate activity and take action against the operating licence holder if necessary.

**Option 3.** Once action has been taken information will be exchanged between the agencies. While this will ensure that key data is exchanged it may restrict the possibility of co-ordinated action between Licensing Authorities and the Commission.

**The Commission recommends the second option at this time as, until the new legislation beds in and working practices are established, volumes of information that will be exchanged is not clear. Over time the Commission will**

be able to review the information received to ensure that appropriate intelligence is received and that there are no gaps in information.

**Consultation Question 12.**

Do you think that the second option in paragraph 5.7 will ensure that Licensing Authorities and the Commission are aware of the actions that the other are taking and will ensure that appropriate interventions can be made?

## 6. Responses to this document

The consultation period for this document will be six weeks and the consultation period will close on **Friday 22 December 2006**.

Please send your comments to **consultation@gamblingcommission.gov.uk**, or by post to:

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