

MEETING OF RENFREWSHIRE LICENSING BOARD

MONDAY 25 NOVEMBER 2024 at 10.00AM

The meeting will be held in public in the Council Chambers, Renfrewshire House, Cotton Street,
Paisley

AGENDA

Councillors Alec Leishman, Andy Steel, Bruce MacFarlane, Cathy McEwan, Jamie McGuire, Janis McDonald,
Jim Paterson, John Gray, Kevin Montgomery and Michelle Campbell

Convener – Councillor Cathy McEwan

1. APOLOGIES

2. DECLARATIONS OF INTEREST

3. LICENSING (SCOTLAND) ACT 2005

Page 1	Applications for Major Variation of Premises Licence to be considered
Page 2	Applications for Provisional Premises Licence to be considered
Page 3	Application for New Grant of a Premises Licence to be considered
Page 4	Application for Personal Licence to be considered
Pages 5-8	Applications for Minor Variation of Premises Licence - DPM - Delegated for noting
Pages 9-10	Applications for Minor Variation of Premises Licence - Delegated for noting
Pages 11-12	Applications for Transfer of Premises Licence - Delegated for noting
Pages 13-16	Applications for Personal Licence – delegated for noting

4. ADMINISTRATIVE ITEMS

- (a) Report by Clerk to the Licensing Board - Timetable of Licensing Board Meetings 2025
- (b) Report by Clerk to the Licensing Board - Chief Constables Report to the Licensing Board
- (c) Report by Clerk to the Licensing Board - The Gambling Act 2005: Review of Licensing Board's Statement of Principles
- (d) Minute of previous meeting on 20 September 2024 to be agreed

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Variation (Major)(s) - Cite**

	Premises	Applicant	Date Received	Comments
1	GLASGOW DISTILLERY COMPANY LIMITED DEANSIDE ROAD HILLINGTON PARK GLASGOW G52 4XB	GLASGOW DISTILLERY COMPANY LIMITED	19 August 2024	
2	RALSTON GENERAL STORE 406-408 GLASGOW ROAD PAISLEY PA1 3BE	MSM PROPERTIES (SCOT) LTD	9 August 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Provisional(s) - Cite**

	Premises	Applicant	Date Received	Comments
1	DOUGLAS LAING & CO DOUGLAS HOUSE 19 MOSSLAND ROAD GLASGOW G52 4XZ	DOUGLAS LAING & COMPANY HOUSE	31 January 2024	
2	SAINSBURY'S 2 MAIN STREET BRIDGE OF WEIR PA11 3PD	SAINSBURYS SL LIMITED	11 September 2024	
3	SAINSBURY'S STATION ROAD BISHOPTON PA7 5GY	SAINSBURYS SL LIMITED	11 September 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****New Grant(s) - Cite**

	Premises	Applicant	Date Received	Comments
1	UNIT 203-204 16-18 BUCCLEUCH AVENUE HILLINGTON PARK GLASGOW G52 4NR	GLENKEIR WHISKIES LIMITED C/O MACDONALD LICENSING DX ED561 EDINBURGH	3 July 2024	

RENFREWSHIRE LICENSING BOARD

Meeting 25 November 2024 at 10:00am

Licensing (Scotland) Act 2005

Personal Licence(s) - Cite

Applicant

Date Received

Comments

1 AARON NICOL

9 September 2024

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Variation (Minor)(s) - DPM - Delegated for noting**

	Premises	Applicant	Date Received	Comments
1	ABBEY BAR 8 LAWN STREET PAISLEY PA1 1HA	PUNCH PARTNERSHIPS (PTL) LIMITED	23 July 2024	
2	CO-OP 26 - 30 GREENOCK ROAD BISHOPTON PA7 5JN	CO-OPERATIVE GROUP FOOD LIMITED	5 July 2024	
3	ELDERSLIE SERVICE STATION MAIN STREET ELDERSLIE PA5 9EN	MOTOR FUEL LIMITED	21 November 2023	
4	GLEDDOCH HOUSE HOTEL OLD GREENOCK ROAD LANGBANK PA14 6YE	GLEDDOCH RESORTS LIMITED	4 March 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Variation (Minor)(s) - DPM - Delegated for noting**

	Premises	Applicant	Date Received	Comments
5	LICENSED GROCER & NEWSAGENT 3 CLARENCE STREET PAISLEY PA1 1PR	PAVNEETSINGH ANTTAL	30 July 2024	
6	LUMINS COCKTAILS & SPORTS BAR 51 CAUSEYSIDE STREET PAISLEY PA1 1YN	FAREED HUSSAIN & MUHAMMAD TAHIR ASLAM	12 February 2024	
7	RED FOX OLD GREENOCK ROAD BISHOPTON RENFREWSHIRE PA7 5JN	N&S PROPERTIES LIMITED	17 July 2024	
8	U-SAVE 21 GREENOCK ROAD BISHOPTON PA7 5JN	MIYAH RETAIL LIMITED	16 August 2023	

RENFREWSHIRE LICENSING BOARD

Meeting 25 November 2024 at 10:00am

Licensing (Scotland) Act 2005

Variation (Minor)(s) - DPM - Delegated for noting

	Premises	Applicant	Date Received	Comments
1	BP GLASGOW AIRPORT CONNECT WHITECART ROAD PAISLEY PA3 2TH	MOTOR FUEL LIMITED	18 September 2024	
2	ELDERSLIE SERVICE STATION MAIN STREET ELDERSLIE PA5 9EN	MOTOR FUEL LIMITED	14 August 2024	
3	LINWOOD FARM 1 HILLHEAD DRIVE LINWOOD PAISLEY PA3 3FE	GREENE KING BREWING & RETAILING LIMITED	29 August 2024	
4	NIP INN 9 HOUSTON SQUARE JOHNSTONE RENFREWSHIRE PA5 8DT	ROSEMOUNT INNS LIMITED	24 July 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Variation (Minor)(s) - DPM - Delegated for noting**

	Premises	Applicant	Date Received	Comments
5	TENPIN XSCAPE DEVELOPMENT KINGS INCH ROAD BRAEHEAD RENFREW PA4 8XQ	GEORGICA LIMITED	5 September 2024	
6	THE TEN O'CLOCK SHOP 34 WELLMEADOW STREET PAISLEY PA1 2EG	SUNIL MARWAHA	22 August 2024	
7	THE WALLACE BAR 43 HIGH STREET RENFREW PA4 8QL	CAROL MCCALLION	8 August 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Variation (Minor)(s) - Delegated for noting**

	Premises	Applicant	Date Received	Comments
1	SAINSBURY SUPERMARKET UNIT J, RETAIL PARK BRAEHEAD RENFREW G51 4BT	SAINSBURY'S SL LIMITED	19 March 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Variation (Minor)(s) - Delegated for noting**

	Premises	Applicant	Date Received	Comments
1	IL POSTO MAR HALL BISHOPTON PA7 5NW	MAR HALL HOSPITALITY LIMITED	7 August 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Transfer(s) - Delegated for noting**

	Premises	Applicant	Date Received	Comments
1	BEL CIBO 48A GLASGOW ROAD PAISLEY PA1 3PW	TRE AMICI ENTERPRICES LTD	22 July 2024	
2	WEAVERS STOW BRAE CANAL STREET PAISLEY PA1 2HD	STOW BRAE LTD	27 August 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Transfer(s) - Delegated for noting**

Premises	Applicant	Date Received	Comments
1 TGI FRIDAY'S UNIT 9 XSCAPE LEISURE DEVELOPMENT KINGS INCH ROAD RENFREW PA4 8XU	DANIEL SMITH & JULIAN HEATHCOTE AS ADMISTRATORS OF THURSDAYS (UK) LIMITED	14 October 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Personal Licence(s) - Delegated for noting**

Applicant	Date Received	Comments
1 STEVEN DOBBIN	1 July 2024	
2 SURAJ DHAKAL	25 April 2024	
3 EILIDH BAIRD	14 June 2024	
4 GEORGE WILL	18 June 2024	
5 BRYAN KERR	1 July 2024	
6 ALAN SENIOR	8 July 2024	
7 KAILUM ANDERSON	8 July 2024	
8 JACQUELINE DONALDSON	10 July 2024	
9 JIMMY MUYANJA	16 July 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Personal Licence(s) - Delegated for noting**

Applicant	Applicant	Date Received	Comments
10	NATASHA ANDERSON	23 July 2024	
11	LOIS DIANE DEBORAH BOWEN	9 July 2024	
12	ALLAN COUPER	25 July 2024	
13	NICOLA DOBIE	25 July 2024	
14	RHIANNON WESTWOOD	25 July 2024	
15	JONATHAN WATSON	26 July 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Personal Licence(s) - Delegated for noting**

	Applicant	Date Received	Comments
1	FIONA FAIRBROTHER	24 July 2024	
2	VIDHYA VIBINKUMAR	26 July 2024	
3	RIMABEN RITESHKUMAR PATEL	12 August 2024	
4	BETH MCCREADY	14 August 2024	
5	RUBAB ZAHRA	20 August 2024	
6	RICHARD WILLIAM CROSSEN	15 August 2024	
7	SYED SHAH	22 August 2024	

RENFREWSHIRE LICENSING BOARD**Meeting 25 November 2024 at 10:00am****Licensing (Scotland) Act 2005****Personal Licence(s) Renewal - Delegated for noting**

	Applicant	Date Received	Comments
1	STEVEN LOUGHLIN	25 April 2024	
2	HAO NIEN HENRY LEE	25 June 2024	
3	IAIN FRANCIS RICHARDSON	16 July 2024	

**RENFREWSHIRE LICENSING BOARD
LICENSING BOARD MEETING
25 NOVEMBER 2024**

REPORTS

- 1. Report by Clerk to the Licensing Board - Timetable of Licensing Board Meetings 2025**
- 2. Report by Clerk to the Licensing Board - Chief Constables Report to the Licensing Board**
- 3. Report by Clerk to the Licensing Board - The Gambling Act 2005: Review of Licensing Board's Statement of Principles**

To: Renfrewshire Licensing Board

On: 25 November 2024

Report by Clerk to the Licensing Board

Timetable of Licensing Board Meetings 2025

1. Introduction

1.1 In 2014, the Licensing Board changed its practice in relation to scheduling its future meetings. Until then, the practice of the Board had been to agree the dates of its next meetings, or delegate authority to the Clerk to agree further dates, at the conclusion of a meeting. In 2014, however, the Board began to schedule meetings for the year ahead.

1.2 To assist members' diaries, a proposed timetable, shown at Paragraph 2.1 of this report, has now been drawn up for the period from January 2025 to December 2025.

2. Proposed Timetable

2.1 It is proposed that the meetings of the Board in 2025 be held on the following dates:-

Friday 31 January 2025
Monday 31 March 2025
Monday 23 June 2025
Monday 15 September 2025
Friday 28 November 2025

It is proposed that these meetings would begin at 10am.

2.2 The proposed dates would allow the Board to meet regularly to consider licence applications it requires to determine under the Licensing (Scotland) Act 2005. They also allow for the Council's recess periods in April, June to August and October. The Licensing Board will require to consider any festive hours policy it considers appropriate at the September meeting.

2.3 In order to comply with the requirements of Regulations made under the above Act, the Board may require to agree additional meetings from time to time. In particular, additional meetings of the Board may be required to hold premises licence review hearings, which should take place within six weeks of an application for review being made.

3. Recommendations

3.1 It is requested that the Board agree the timetable of meetings for the period January 2025 – December 2025 as detailed in Paragraph 2.1 of this report.



Mark Conaghan
Clerk to the Licensing Board

To: Renfrewshire Licensing Board

On: 25 November 2024

Report by Clerk to the Licensing Board

Chief Constable's Report to the Licensing Board

1. Summary

1.1 Section 12A of the Licensing (Scotland) Act 2005 ("the 2005 Act") requires the Chief Constable, on an annual basis, to provide a report to the Licensing Board setting out the Chief Constable's views about policing in connection with the 2005 Act in the Board's area and any steps taken, or intended to be taken, in that year or the following year, to prevent the sale or supply of alcohol to children or young people in that area.

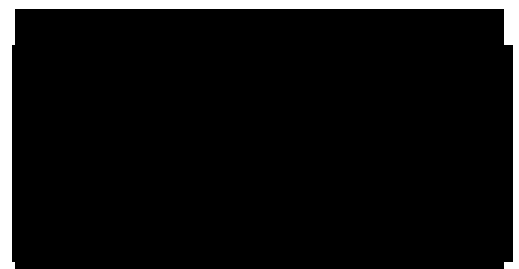
1.2 Police Scotland have recently provided a report in respect of the above matters for the year to 31 March 2024. A copy of this report is attached as Appendix 1.

1.3 The Board has the power to request the Chief Constable or an officer nominated on his behalf to attend a meeting of the Board to discuss the terms of the report.

2. Recommendations

2.1 It is recommended that the Board –

2.1.1. Note the content of the report attached as Appendix 1 to this report.



Mark Conaghan
Clerk to the Licensing Board

Renfrewshire Licensing Report 2023-2024



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SCOTLAND**
Keeping people safe

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FOREWARD

I am pleased to introduce the Annual Licensing Report for 2023/24, in accordance with Section 12(A) of the Licensing (Scotland) Act 2005.

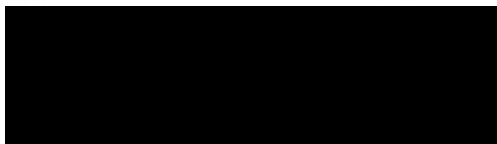
Since taking up the position of Chief Constable of Police Scotland in October 2023 I have been committed to focusing on working closely with communities to solve problems through proactivity.

In respect of Licensing, this has been made possible with the continued support of the 32 local authorities across Scotland as well as many other associated national and local partnerships.

This collaborative working ensures a fair approach to licensing for the benefit of the licensed trade while simultaneously preventing alcohol fuelled violence, disorder and antisocial behaviour.

In the year ahead our approach will remain focused on prevention and collaboration to ensure high standards of service delivery. I will continue to encourage officers and staff to utilise the range of options available to them to maintain and improve licensing standards and to positively influence behaviour in and around all licensed premises throughout Scotland.

I would like to take this opportunity to thank our local partnerships for their contribution to maintaining high standards and driving improvement where necessary within the Licensed Trade for the benefit of the communities we all serve.



Chief Constable Jo Farrell

Police Service of Scotland

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Police Scotland Licensing Overview –

The Violence Prevention and Licensing Co-ordination Unit (VPLCU) sits within Policing Together, based at Dalmarnock Police Station, Glasgow.

The VPLCU upholds the two tier structure for licensing which supports both national and local priorities through service delivery. They have overall responsibility for determining and delivering national licensing strategy and policy, by providing advice, guidance and support to divisional licensing teams as well as undertaking other specialist functions.

The Violence Prevention and Licensing Co-ordination Unit is a specialist department which consists of a small team of officers, based in Glasgow. The officers within the unit work with divisional licensing teams and partner agencies to help shape policy and strategy around the police licensing function. They provide practical and tactical advice to police licensing practitioners, operational officers, supervisors and policing commanders.

The VPLCU seek to ensure that legislation governing the sale and supply of alcohol is applied consistently across the country and all opportunities are taken to stop the illegal or irresponsible sale, supply or consumption of alcohol with the intention of preventing and reducing crime and disorder.

During 2023/2024, from a licensing perspective, our particular focus was on the following;

- Scrutiny of the serious incidents of violence, disorder and antisocial behaviour linked to licensed premises.
- Governance and ongoing development of the National ICT Licensing System, known as “Inn Keeper”, to increase the efficiency and effectiveness of liquor and civic licensing administration and management. Police Scotland are currently working on upgrade to the National ICT system to ensure compliance with GDPR legislation.

Each of the 13 Local Policing Divisions have a licensing team responsible for the day to day management of licensing administration, complying with statutory requirements as well as addressing any issues that may arise within licensed premises in their local area.

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LICENSING BOARD AREA

The Licensing Board area is policed by Renfrewshire and Inverclyde (K) Division Chief Superintendent Gordon McCreadie is the Local Police Commander who has the responsibility for all day-to-day policing functions.

Local Policing Priorities

Following our public consultation process, the policing priorities for Renfrewshire and Inverclyde Division, as set out in our Local Policing Plan are as follows.

- Cyber and Digital Crime
- Serious and Organised Crime
- Counter Terrorism and Domestic Extremism
- Antisocial behaviour, violence and disorder
- Road Safety and Road Crime
- Protecting vulnerable People
- Acquisitive Crime

The Licensing Board area is policed by Renfrewshire & Inverclyde Division

Chief Superintendent Gordon McCreadie is the Local Police Commander with responsibility for all policing functions.

T/Chief Inspector Alexandra Marshall is the Local Area Commander for Renfrewshire with responsibility for the management of personnel, local service delivery, community engagement and partnership working to ensure local and national priorities are met for the reporting period.

Covering an area of 261 sq. km (101 sq. miles), Renfrewshire is bounded by the [Firth of Clyde](#) to the north, by [East Renfrewshire](#) to the south, by [Inverclyde](#) to the west, by [North Ayrshire](#) to the southwest, and by the City of [Glasgow](#) to the east. Renfrewshire is the ninth smallest Scottish council area in size, the ninth largest in population and the sixth highest in population density, with 54 per cent of its land used for agriculture. About one sixth of the area is developed, primarily for urban use.

Renfrewshire has a diverse economy which has benefited from the presence of Glasgow International Airport. Tourism is developing with historic attractions in [Paisley](#) (the Abbey, Town Hall, [Coats Observatory](#), Museum and Art Gallery, and the [Sma' Shot Cottages](#), [Kilbarchan](#) (Weavers Cottage), as well as several country parks

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in the council area. Iconic sites such as the Braehead Shopping Centre, the Soar Complex and Glasgow Airport, attract over 29 million visitors per year.

Renfrewshire has a rich history in effective partnership working which helps to deliver highly successful policing, impacting positively on local communities.

There are currently 427 licensed premises in Renfrewshire, 151 licensed off sales premises, 89 licensed premises for on sales only and 187 licensed premises for both on and off sales.

OPERATION OF THE LICENSING (SCOTLAND) ACT 2005

Alcohol misuse, exacerbated by its accessibility, availability and affordability, is commonly acknowledged as a contributory factor in incidents of violence, disorder and antisocial behaviour.

Police Scotland continues to work with its partner agencies, including the licensed trade, to reduce the impact alcohol misuse has on local communities. By working together, we can target those who fail or simply refuse to promote responsible trading practices. Together we can improve the safety and wellbeing of people, places and communities in Scotland.

Police Scotland currently have 3 levels for categorising licensed premises that come to our attention:

- **Monitored** – Premises that require extra support and supervision. This can include premises coming to police attention through incidents or newly opened premises with inexperienced staff. A low-key approach is used to address issues before they escalate.
- **Intervention** – A formal intervention agreement is put in place to improve the safe and legitimate operation of a premises. This intervention plan, which contains a list of conditions, is agreed between all parties. The intervention period would last a minimum of three months and be subject to review.
- **Problematic** – Premises deemed problematic will normally be the subject of a premises licence review submission by Police Scotland to the Licensing Board.

Any categorised premises will be subject to regular inspections to ensure compliance and will form part of the tasking regime for the night-time economy action plans. All inspections, pro-active, re-active or planned are submitted via the Innkeeper system.

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Board Decisions

Figures for the period 1st April 2023 to 31st March 2024 show that there was one premise within Renfrewshire which was monitored and subject to regular inspections. There were no premises in Renfrewshire subject of a premises review during period.

Summary

Appendix A provides details of crimes/offences detected and volume of applications processed by Police Scotland for licensed premises within Renfrewshire in terms of the Licensing (Scotland) Act 2005, between 1 April 2023 and 31 March 2024.

Section 1 – Unlicensed sale of alcohol – There were no offences of this nature reported.

Section 22 – Objections and Representations – No representations were submitted by Police Scotland in response to the grant of new premises licences.

Section 36 – Review Applications – No premise was subject to a review application.

Section 63 – Sale or supply out-with licensed hours – There were no offences of this nature reported.

Section 72 – Personal Licence Applications – No submissions was made to the Licensing Board during the period.

Section 82 – Failure to notify Licensing Board of convictions – No persons were charged for failing to disclose convictions to Board.

Section 84 – Personal Licence Reviews – No individuals were subject of a personal licence review.

Section 94 – Exclusion Orders – There were no exclusion orders submitted.

Section 97 – Closure Orders – There were no closure orders issued.

Section 104 – Buy/attempt to buy alcohol on behalf of a child - No individuals were charged for committing this offence during the period.

Section 108 – Deliver alcohol to person under the age of 18 – No persons were charged for committing this offence during the period.

Section 111-116 – Drunkenness/Disorder Offences - No persons were charged under these sections during this period.

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PREVENTING THE SALE OR SUPPLY OF ALCOHOL TO CHILDREN OR YOUNG PEOPLE

Partnerships

Partnership working is key to delivering tangible outcomes and we continue to strengthen our relationships with all agencies, community representatives and residents to ensure our services are co-ordinated, effective and efficient and address the needs of our communities.

IT'LL COST YOU - Proxy Purchase Campaign

This Campaign focused on hot spot areas with educational interventions supported by third sector partners.

The main aims of the campaign were to

- Reduce the number of attempted purchases of alcohol for under 18s.
- Reduce crime and antisocial behaviour in the area.
- Reduce the vulnerability of those abusing alcohol under 18.
- Reduce the number of hospital admissions for under 18s with alcohol related injuries.
- Educate the public regarding the offence and dangers of proxy purchase within our communities.
- Educate Off-Sales and Licensed Premises to highlight the dangers of Proxy Purchase and operate within the Licensing Objectives.

The success of initiatives such as “Challenge 25” and joint work with Renfrewshire Council have reduced the direct sale of alcohol to those under 18, however alcohol related violence and anti-social behaviour illustrate that younger age groups are increasingly gaining access to alcohol by other proxy sales. The most common method involves asking adults to buy alcohol for them.

The Licensing (Scotland) Act 2005 makes it an offence for a person to act as an agent for a child in purchasing or attempting to purchase alcohol'. This is known as proxy purchase. The penalties for this offence include a fine of up to £5000 and/or three months in prison.

With the assistance from the community police information was distributed to off licenses alongside bottle marking initiatives and engagement with the License holders.

Major supermarkets were approached, and joint social media posts were published with the major supermarket retailers. These premises also allowed campaign material to be left at alcohol aisles and front doors to their premises publicise the campaign.

St Mirren football club, Renfrewshire Council were supportive of the campaign.

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The campaign continued with joint initiatives with the preventions and interventions department carrying out engagement events at shopping centres within Renfrewshire, local community Gala days, UWS and West of Scotland College campus through student services.

There has been a decrease across the division on youth related alcohol incidents which highlights the importance for the continuation of the campaign where certain areas have been highlighted for attention.

“No Knives Better Lives”

This is a national initiative and aims to raise awareness of the consequences of carrying knives and provides information on local activities and opportunities for young people. It is recognised that alcohol consumption influences risk taking behaviors.

‘No Knives, Better Lives’ training toolkit has been cascaded to secondary schools in Renfrewshire. Street Stuff have also been utilising those lesson plans.

The campaign has continued to run following the pandemic and is supported by education and local policing teams.

Renfrewshire ADP Prevention and Education Subgroup

The Renfrewshire Alcohol and Drug Partnership (ADP) is the strategic planning and performance mechanism for drug and alcohol addiction in Renfrewshire. This Sub-Group is part of a sub-structure that has been set up to take forward specific work in relation to alcohol and drug prevention and education in Renfrewshire. The purpose of this Group is to facilitate a strategic, cohesive and planned approach to Alcohol and Drug Prevention and Education in Renfrewshire. This group has membership from Renfrewshire Council – children services, education and social work, NHS and Police Scotland by way of the Licensing Sergeant from Renfrewshire and Inverclyde Division. The responsibilities of this group include –

- The development of a Prevention and Education Delivery Plan to monitor progress and outcomes of local and national policies.
- To inform the ADP of the progress implementing local and national priorities related to prevention and education from policies.
- Provide a forum to discuss and influence Local and National policy.
- Share best practice based on the principles of the Greater Glasgow and Clyde Alcohol and Drug Prevention model.
- Enable partners to deliver specific Prevention and Education activity and act in an advisory capacity to local organisations/agencies.
- Support a co-ordinated approach to wider workforce development.

Renfrewshire and Inverclyde Division are committed to playing a key role in the prevention and education within the Local Authority area.

TACKLING SERIOUS AND ORGANISED CRIME

The Serious Organised Crime Taskforce was set up to ensure Scotland can respond robustly to the threat posed by organised crime, identify improvements, and ensure all agencies are working to the same aims to raise public awareness. Membership of the group includes the Solicitor General; the Police Service of Scotland; the Prison Service; Her Majesty's Revenue and Customs (HMRC); National Crime Agency (NCA); Society of Local Authority Chief Executives (SOLACE); Her Majesty's Inspectorate of Constabulary Scotland (HMICS) and Scottish Business Resilience Centre (SBRC).

Its remit is to work together to help deliver the Scottish Government's commitment to tackling serious organised crime by:

- Identifying priorities for tackling serious organised crime (SOC) in Scotland.
- Sharing best practice and improving co-ordination between law enforcement agencies and others.
- Identifying innovative ways of working together and encouraging better ways of working together.
- Developing a coherent Scottish response on reserved and other SOC issues; and
- Making proposals for legislation, research and other measures to tackle SOC.

There are several groups operating within the Renfrewshire and Inverclyde area, some of which have connections to the licensed trade, via licensed premises, second hand dealers, tanning salons and car wash facilities. Police Scotland, in conjunction with our partner agencies, have identified innovative ways to disrupt such organisations who are targeted through multi-agency days of action. Whilst it can be difficult to link these groups to serious crimes, targeting other crimes has proven to be a useful tool in disrupting their operations.

PROPOSED ACTIVITY FOR THE YEAR AHEAD

Enforcement Operations

The Licensing department will continue to plan and co-ordinate multi agency operations with officers from Home Office Immigration Enforcement (HOIE), Her Majesty's Revenue and Customs (HMRC) and Renfrewshire Council targeting all forms of licensed premises and persons within the area.

To conclude we would like to thank you for your continued support during what has been a challenging year for all. We have all had to adapt to a new way of working and ever-changing circumstances which has been embraced by all.

We look forward to a safe and healthy 2024/2025.

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APPENDIX A

Licensing (Scotland) Act 2005

Review Applications 1st April 2023– 31st March 2024

Renfrewshire Board Area

Type of Application	Total
Section 36 Licensing (Scotland) Act 2005 – Application for Review of Premises Licence	0
Section 84A Licensing (Scotland) Act 2005 – application for review of personal licence due to conduct inconsistent with licensing objectives	0
Total	0

Licensing (Scotland) Act 2005

Applications Received 1st April 2023 – 31st March 2024

Renfrewshire Board Area

Type of Application	Total
Premises Licence	3
Provisional Premises Licence	6
Extended Hours	46
Major Variation	12
Minor Variation	102
Occasional Licence	1043
Personal Licence	108 *98 New / 10 Renewals
Premises Transfer	36
Total	1356

To: Renfrewshire Licensing Board

On: 25 November 2024

Report by Clerk to the Licensing Board

The Gambling Act 2005: Review of Licensing Board's Statement of Principles

1. Summary

1.1 This report advises the Board on the consultation undertaken in respect of Renfrewshire Licensing Board's Statement of Principles under the Gambling Act 2005 ("the Act") and seeks approval of the Statement of Principles for 2025-2028 attached as Annex 1.

2. Recommendation

2.1 It is recommended that the Board approve the terms of the Statement of Principles attached as Annex 1 and agree to adopt the Statement with effect from 31 January, 2025.

3. Background

3.1 In terms of Section 349 of the Act, the Board is required to publish a Statement of Principles ("the Statement") that they propose to apply in exercise of their functions under the Act for a three year period. The Board's last Statement (for 2022-2025) was approved in 2021 and now falls to be reviewed in terms of the Act.

3.2 At its meeting on 17th June 2024, the Board agreed to consult on what changes should be made to the current Statement, for inclusion in the Statement for 2025-2028. The Board authorised the Clerk, at that meeting, to consult various bodies and persons. The Board instructed officers, following that consultation, to submit a further report to the Board with a final version of the Statement for consideration and approval. The proposed final Statement is attached at Annex 1 to this report. The list of persons and bodies consulted is set out at Appendix 1 to that proposed Statement.

3.3 In response to the consultation, three responses were received prior to close of the consultation on 4th October 2024, from the parties detailed at Paragraphs 3.3.1 to 3.3.3. These responses are attached as Annex 2 and are summarised in the following paragraphs:-

3.3.1 Police Scotland- Police Scotland responded on two separate occasions, through their Partnerships and Prevention team and their local licensing officers. In the first case, they advised that they had no concerns or observations other than that the reference in the previous policy to the impact on services due to the covid pandemic should be removed. In the second case, Police Scotland confirmed that they were supportive of the Board's current Statement and also provided information on steps taken by Police Scotland to address gambling concerns.

3.3.2 The Entain Group- They have not required any changes they consider ought to be made to the

current Statement.

- 3.3.3 GamCare- In addition to providing background information regarding their role, GamCare reference the National Helpline and commend a public health approach to gambling policy. It is not clear that all of GamCare's response suggests changes to the current Statement, as it proposes training for care staff, which would not be a regulatory matter within the remit of the Licensing Board. They also recommend a continued Local Area Profile approach to allow for proper scrutiny of, and possible opposition to, a licence application.
- 3.4 If the Board approve the recommendation, the Board is required to publish a Notice of its intention to publish a Statement or revision in accordance with the Gambling Act 2005 (Licensing Authority Policy Statement) (Scotland) Regulations 2006, four weeks prior to the date the revised statement will come into effect. Further, the Board will require to publish the revised Statement on the authority's website and make the Statement available to members of the public for at least four weeks prior to the date when the revised Statement will come into effect (31 January 2025).

4. Equality Impact

The Recommendation contained within this report has been assessed in relation to its impact on equalities and human rights and the parties listed in Appendix 1 to the draft Statement of Principles at Annex 1 have been consulted on the terms of the proposed policy. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendation contained in the report, as no policy is currently proposed which would prevent gambling facilities being made available in any specific location. The proposed changes to the current policy are considered by officers to be limited.



Mark Conaghan
Clerk to the Licensing Board

Renfrewshire Licensing Board

**Statement of Principles
under the
Gambling Act 2005
Section 349**

31st January 2025

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RENFREWSHIRE LICENSING BOARD

GAMBLING ACT 2005

STATEMENT OF PRINCIPLES

1. Introduction

- 1.1 The Gambling Act 2005 (“the Act”), which came into full force and effect on 1 September, 2007, created a new system of licensing and regulation for all commercial gambling in Great Britain, other than the National Lottery and spread betting. Section 349 of the Act required all licensing authorities to prepare and publish a Statement of Principles to be applied in exercising their functions under the Act.

The Act provided that a Statement of Principles shall apply for a period of three years and may be reviewed and revised during that period if appropriate.

Renfrewshire Licensing Board (“the Board”) approved its first Statement of Principles on 17th January, 2007 to cover the three-year period from 31st January 2007. In January 2010, 2013, 2016, 2019 and 2022, further Statements of Principles were published for the three year periods to 31st January 2013, 2016, 2019, 2022 and 2025.

As required in terms of Section 349 of the Act, the Board has consulted on and reviewed its Statement of Principles. A list of those consulted is attached at Appendix 1. The following is the Board’s Statement of Principles which it proposes to apply in exercising its functions under the Act during the three year period beginning on 31 January, 2025. This Statement of Principles will be kept under review and revised, if appropriate, during the three year period.

- 1.2 In preparing this Statement of Principles account has been taken of the statutory guidance issued by the Gambling Commission. The current edition of the guidance was published on 1 April 2021 (last updated in 2023, with formatting changes) The current Guidance, which lists the changes made since the previous edition, can be found at <https://www.gamblingcommission.gov.uk/print/guidance-to-licensing-authorities>

- 1.3 In exercising its functions under the Act, the Board will have regard to the statutory licensing objectives set out in Section 1 of the Act, namely:
- 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 being conducted in a fair and open way; and
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 1.4 In accordance with Section 153 of the Act, the Board, in making decisions concerning premises licences, aims to permit the use of premises for gambling in so far as they think it is:
- in accordance with any relevant Code of Practice issued by the Gambling Commission;
 - in accordance with any relevant guidance issued by the Gambling Commission;
 - reasonably consistent with the licensing objectives; and
 - in accordance with this Statement of Principles.
- 1.5 Nothing in the Statement will override the right of any person to make an application under the Act or to have the application considered on its individual merits, undermine the right of any person to make representations on an application or to seek a review of a licence where there is a legal power to do so.
- 1.6 This Statement is intended to be a general Statement of Principles and is not to be regarded as a comprehensive guide to the application of the Act by the Board. Applicants and others should always have regard not only to this Statement of Principles but also to the Act, any regulations made under the Act and any Guidance or Codes of Practice issued by the Gambling Commission. Guidance and Codes of Practice issued by the Gambling Commission may be accessed on the Commission's web site, <http://www.gamblingcommission.gov.uk/>
- 1.7 In producing this Statement of Principles, the Board has had regard to the licensing objectives of the Act, the Guidance issued by the Gambling Commission and any responses from those consulted on this Statement of Principles.
- 1.8 In making decisions under the Act, the Board will have regard to this Statement of Principles but every application will be considered on its own merits. The aim of the Licensing Board in this Statement is to promote the licensing objectives and in particular to address the impact of licensed premises in terms of crime and disorder arising from gambling and ensure that suitable controls are placed

on gambling appropriate to the location and internal layout of gambling licensed premises to address any concerns relevant to the licensing objectives. The Licensing Board is committed to partnership with all stakeholders with a view to the promotion of these aims. The Board recognises the impact that unregulated gambling may have on its community and local plans for growth and regeneration of the economy and, in delivering the gambling regime will, with regard to the principles set out in this Statement, seek to support its local economy and protect children and vulnerable people.

- 1.9 The Act provides that unmet demand is not a criterion of which the Board may take account when considering an application and the Guidance issued by the Gambling Commission states that moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. The Board will therefore not have regard to demand or moral objections when exercising its functions under the Act.
- 1.10 The Board are committed to avoiding duplication with other legislation and regulatory regimes as far as possible and the legal requirements of such other legislation (e.g. Health and Safety legislation) have not been repeated in this Statement of Principles.

2. Renfrewshire Licensing Board

- 2.1 Renfrewshire Licensing Board, which is referred to in this Statement of Principles as "the Board", is the licensing authority for Renfrewshire. Renfrewshire is situated to the West of Glasgow on the south bank of the River Clyde and covers nearly 101 square miles. Renfrewshire's population is estimated at approximately 183,874 (according to 2022 Census information), making it the ninth largest Council area in Scotland in terms of population.
- 2.2 Further information in relation to the proportions of dependent children in households throughout Renfrewshire, and information in relation to the location of schools, premises used by children and young people and premises where support is offered to vulnerable people, such as those with addiction problems, including registered care homes, is provided at Section 13.24 and Appendices 3 and 4 to this Statement. This information is provided to give further information as to the local area profile of Renfrewshire in terms of addiction services, educational establishments and other premises frequented by children and vulnerable people.

3. Consultation on the Statement of Principles

3.1 The Act requires the following parties to be consulted prior to publication of this Statement of Principles:

- the Chief Constable
- one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the Board's area; and
- one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Act.

3.2 The parties consulted in relation to the Statement of Principles are listed in Appendix 1.

3.3 The Board's practice is to have regard to and give appropriate weight to the views of those whom it had consulted. In determining what weight to give to particular representations, the Board's practice is to take account of the following factors:

- who is making the representations (what is their expertise or interest);
- relevance of the factors to the licensing objectives;
- how many other people have expressed the same or similar views;
- how far the representations relate to matters which the Board should be including in its Statements of Principles.

3.4 In considering the views of consultees, the Board's practice is also to consider whether those views should be taken into account and the extent to which the Board are able to deal with the issues raised. For example, the views may relate to a matter which is dealt with under other legislation such as planning.

3.5 The Board's officers consulted as to what should be the terms of the new Statement of Licensing Policy between July 2024 and early October 2024. In response to the consultation, responses were received from Police Scotland (two submissions), The Entain Group and GamCare.

4. Summary of Matters dealt with in Review

4.1 A number of matters have been updated in this Statement, including the introductory description of Renfrewshire, as required. The

Appendices have been updated, where updated information has been provided since the formulation of the previous Statement. Other minor changes have been made to the Statement as required.

- 4.2 Appendix 4 has, in particular, been updated to reflect current local gambling related risks and harms. Updated information in relation to community-based youth spaces has been provided. This will inform applicants and those making representations to applications about what evidence may assist the Licensing Board in considering the licensing of premises or proposed premises.

5. Licensing Authority Functions

5.1 This Board will make decisions upon applications or notifications made for:

- premises licences;
- temporary use notices;
- occasional use notices;
- permits as required under the Act; and
- registrations as required under the Act.

5.2 This Statement of Principles relates to all those licensable premises, notices, permits and registrations identified as falling within the provisions of the Act, namely:

- casinos;
- bingo premises;
- betting premises;
- tracks;
- adult gaming centres;
- licensed family entertainment centres;
- unlicensed family entertainment centres;
- club gaming permits; prize gaming and prize gaming permits;
- occasional use notices;
- temporary use notices; and
- registration of small society lotteries.

5.3 The Board will not be involved in licensing remote gambling. Regulation will fall to the Gambling Commission through operator licences.

6. Child Protection

6.1 In terms of Section 157 of the Act and Regulations under the Act, the Board is required to designate in writing a body which is competent to advise the Board about the protection of children from harm.

6.2 The Board designates Renfrewshire Child Protection Committee. This is an inter-agency body representing the statutory, private and voluntary sectors with a wide knowledge and experience of child protection matters: it has the specialist knowledge and expertise to advise the Board about the protection of children from harm.

7. Responsible Authorities

7.1 Responsible authorities are public bodies that must be notified of applications and which are entitled to make representations to the Board in relation to premises licences and applications for premises licences.

7.2 The responsible authorities in the Board's area are:

1. the Gambling Commission.
2. the Chief Constable, Police Scotland.
3. the Chief Fire Officer, Scottish Fire and Rescue Service.
4. Chief Executive's Service (Economy and Development), Renfrewshire Council.
5. Environment, Housing and Infrastructure, Renfrewshire Council.
6. Renfrewshire Child Protection Committee (see paragraph 6.2 above).
7. Her Majesty's Commissioner of Customs and Excise.
8. any other person prescribed in regulations by the Secretary of State or Scottish Ministers.

8. Interested Parties

8.1 Interested parties can make representations about licence applications or apply for a review of an existing licence. A person is an interested party if that person, in the opinion of the Board:

- lives sufficiently close to the premises to be likely to be affected by the authorised activities;
- has business interests that might be affected by the authorised activities; or
- represents persons in either of the above two groups.

8.2 In determining whether a person is an interested party, the Board will consider each case on its own merits.

8.3 In determining whether a person is a “person living close to the premises”, the Board may take account of the following factors:

- size of the premises;
- the nature of the premises;
- the distance of the premises from the location of the party making the representation, the topography and the routes likely to be taken;
- the potential impact of the premises; and
- the circumstances of the person.

8.4 In determining whether a party is a person with business interests that could be affected, factors that may be taken into account include:

- the size of the premises; and
- the proximity of the premises to any premises of the party making representations.

8.5 In deciding whether a person represents a party in either category described in 8.1 above, the Board will make decisions on a case by case basis; in appropriate cases, the Board may require written evidence such as a letter confirming that the person does indeed represent the party. The Board will not request from democratically elected persons, such as Councillors, MPs and MSPs for the constituency or ward likely to be affected, specific evidence that they have been asked to represent an interested party. The Board will similarly consider responses from community councils or from community groups representing vulnerable people living near the premises or proposed premises.

9. Compliance and Enforcement

- 9.1 The Board has powers in terms of Part 15 of the Act to inspect premises, to monitor compliance with the provisions of the Act and, in respect of licence conditions, to investigate suspected offences.

Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation in the exercise of the function. These principles are detailed in 9.2 below. The Board will also have regard to the requirements of the Regulators' Code published by the Department for Business, Innovation and Skills (now the Department for Business, Energy and Industrial Strategy).

- 9.2 The Board will seek to ensure that its approach to compliance and enforcement is:

- proportionate: regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised;
- accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- consistent: rules and standards will be applied fairly and equally to all parties;
- transparent: regulators should be open, and keep regulations simple and user friendly; and
- targeted: regulation should be focused on the problem, and minimise side effects.

- 9.3 The Board will seek to ensure that any inspection programme is risk based. Premises will be subject to a scheme of routine inspection, the frequency of which will be determined by the risks imposed; those premises considered to pose the greatest risk will be subject to more frequent inspections than those presenting a lower risk.

- 9.4 When assessing risk, consideration will be given to:-

- the nature of the gambling activities carried out on the premises;
- the location of the premises in relation to schools and other premises frequented by children and vulnerable persons, such as the premises detailed at Appendix 4;
- the procedures put in place by the management of individual premises to meet the licensing objectives.

- 9.5 The Board, to monitor compliance with its functions under the Act, will work actively with the Gambling Commission's Compliance Officer and other partner agencies to enforce the licensing legislation. The Responsible Authorities shall also monitor the Renfrewshire area for any unlicensed premises or gambling activity and ensure, where this is identified, it is reported to the Gambling Commission or other appropriate agency.

9.6 In accordance with the principle of transparency, copies of any enforcement and compliance protocols adopted by the Board will be made available.

9.7 The Board recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are recognised and resolved at the earliest stage, operators are requested to provide the authority with a single named point of contact and contact details, who should be a senior individual, and whom the Board will contact first should any compliance queries or issues arise.

10. Exchange of Information

10.1 In exercising its functions under the Act, the Board will exchange relevant information with other regulatory bodies. The Board will act in accordance with the provisions of the Act, data protection and freedom of information legislation, the Licensing Board's Privacy Policy and the Guidance and Codes of Practice issued by the Gambling Commission.

11. Equality and Diversity

11.1 Renfrewshire Licensing Board is committed to promoting equal opportunities, valuing diversity and tackling social exclusion. The Board will aim to provide opportunities that meet the diverse needs of different people and groups of people by ensuring that services and employment opportunities are accessible to all. Everyone will be treated fairly and with respect. Diversity needs will be understood and valued. The Board will aim to eradicate all forms of discrimination.

12. Local Risk Assessment

12.1 The Gambling Commission's Licence Conditions and Codes of Practice (LCCP), the most recent version of which became effective from 30th August 2024, formalise the need for operators to consider local risks. Local risk assessments apply to all non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences. This provision came into force on 6 April 2016.

- 12.2 Licensees are required to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in this policy statement.
- 12.3 Licensees must review (and update as necessary) their local risk assessments:
- a) to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b) when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c) when applying for a variation of a premises licence; and
 - d) in any case, undertake a local risk assessment when applying for a new premises licence.
- 12.4 The Social Responsibility Code provision is supplemented by an Ordinary Code provision that requires licensees to share a copy of their own risk assessment which will set out the measures the licensee has in place to address specific concerns. "Ordinary Codes" are not mandatory but operators are expected to follow them unless they can put alternative arrangements in place that are equally effective. This practice should reduce the occasions on which a premises licence review and the imposition of licence conditions is required. The Board expect applicants for a premises licence, or for variation of a premises licence, to lodge their risk assessment with the Board, as licensing authority, along with their application for grant or variation. The Board's officers may also request a copy of a local risk assessment at any time. It is expected that local risk assessments will be kept at individual licensed premises to which they relate and premises managers should be familiar with the individual risk assessments, which should be reviewed and monitored as required.
- 12.5 The licensing authority have an expectation that all local risk assessments will take into account the vicinity of licensed premises to non-gambling premises such as schools, community-based youth spaces, gambling or addiction support or treatment locations and care services where children and vulnerable people are likely to be present. Information about the proportions of dependant children in households in areas throughout Renfrewshire and locations where vulnerable people are likely to be present is provided at Section 13.24 and Appendices 3 and 4 to this Statement to assist licence holders and applicants and those seeking to make representations to the Licensing Board.

The Board expects local risk assessments to set out how people with gambling dependencies are protected within licensed premises, particularly where the premises are located near to facilities for children and vulnerable people.

The Board also encourages within risk assessments (i) proposals between operators for a self-exclusion network for declared 'problem gamblers', particularly in areas where there is a concentration of gambling premises (ii) information on training programmes for staff to ensure that they are able to identify children and other vulnerable people and the action the operator will take to ensure they are not able to enter the premises; (iii) information as to how the operator ensures an adequate number of staff and managers are on the premises at key points throughout the day; (iv) information as to whether the layout, lighting and fitting out of the premises have been designed so as not to attract children and other vulnerable persons who might be harmed or exploited by gambling, and (v) consideration as to whether any promotional material associated with the premises could encourage the use of the premises by children or young people who are not legally allowed to use the premises.

13. Premises Licence General Principles

13.1 In accordance with Section 150 of the Act, Premises licences can authorise the provision of facilities on:

a) casino premises

b) bingo premises

c) betting premises, including tracks and premises used by betting intermediaries

d) adult gaming centre premises (for category B3, B4, C and D machines), gaming machine categories are defined in the Categories of Gaming Machine Regulations 2007 as amended. The definitions as at the date of publication of this Statement are included as Appendix 2.

e) family entertainment centre premises (for category C and D machines) (note that, separate to this category, the Licensing Board may issue a family entertainment centre gaming machine permit, which authorises the use of category D machines only.)

13.2 By distinguishing between types the Act makes it clear that the primary gambling activity of the premises should be that described. Thus, in a bingo premises, the primary activity should be bingo, with gaming machines allowed within the terms of the legislation as an ancillary offer on the premises. This principle also applies to existing casino licences and betting premises licences (referred to in the Commission's Guidance as off-course betting).

Subject to the gaming machine entitlements which various types of licence bring with them (and except in the case of tracks), the Act does not permit premises to be licensed for more than one of the above activities.

- 13.3 Premises licences will be subject to the restrictions set out in the Act and regulations as well as to specific mandatory and default conditions which are detailed in regulations issued under the Act.
- 13.4 The Board may exclude default conditions and also attach other conditions, where it believes it is appropriate.
- 13.5 In making decisions about premises licences, the Board will aim to permit the use of premises for gambling insofar as it is
- in accordance with any relevant code of practice issued by the Gambling Commission;
 - in accordance with any relevant guidance issued by the Gambling Commission;
 - reasonably consistent with the licensing objectives; and
 - in accordance with this Statement of Licensing Principles.
- 13.6 Definition of “Premises” - In the Act “premises” is defined as including “any place”. The Act prevents more than one premises licence applying to any place. However a single building could be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can reasonably be regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, the Gambling Commission states in its current Guidance that licensing authorities should pay particular attention if there are any issues about sub-divisions of a single building or plot and will ensure that mandatory conditions relating to access between the premises are observed.
- 13.7 The Gambling Commission states in its current Guidance to Licensing Authorities that: “In most cases the expectation is that a single building/plot will be the subject of an application for a licence, for example, 32 High Street. But, that does not mean 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as separate premises will depend on the circumstances.” The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter of discussion between the operator and the licensing officer. However, the Commission does not consider that areas of a building that are artificially separated, for example by ropes or moveable partitions, can properly be regarded as separate premises.

13.8 The Board takes note of the Gambling Commission's Guidance to Licensing Authorities which states that licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, the Board should be aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and that people do not 'drift' into a gambling area. The plan of the premises should clearly denote entrances and exits. The Board notes that in terms of a mandatory condition of Bingo and Family Entertainment Centre licence under-18s should not have access to areas where category B and C gaming machines are located and that further mandatory conditions of licences require the area to be:

- separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for that purpose
- supervised at all times to ensure that under-18s do not enter the area, and supervised by either:

- one or more persons whose responsibilities include ensuring that under-18s do not enter the areas

- CCTV monitored by one or more persons whose responsibilities include ensuring that under-18s do not enter the areas

- arranged in a way that ensures that all parts of the area can be observed.

A notice must also be displayed in a prominent place at the entrance to the area stating that no person under the age of 18 is permitted to enter the area.

13.9 The Guidance also gives a list of factors which the Board should be aware of, which may include:

- Do the premises have a separate registration for business rates?
- Is the premises' neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?

The Board will consider these and other relevant factors in making its decision, depending on all the circumstances of the case.

13.10 Applicants can apply for a premises licence in respect of premises which have still to be constructed or altered and the Board will determine such applications on their merit.

In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, the Board will

determine applications on their merits, applying a two stage consideration process:-

- First, whether the premises ought to be permitted to be used for gambling
- Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

Applicants should note that the Board is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

More detailed examples of the circumstances in which such a licence may be granted can be found in Chapter 7 of the Gambling Commission's current Guidance.

13.11 In determining premises licences the Board may not have regard to the expected demand for the facilities which the premises is proposed to provide.

13.12 In accordance with the Gambling Commission's Guidance the Board will pay particular attention to the protection of children and vulnerable persons from harm or exploitation by gambling, as well as to issues of crime and disorder.

13.13 The Board has not adopted any specific policy in relation to areas where gambling premises should not be located. However, where representations are received in relation to an application for a premises licence, the application will be considered at a meeting of the Licensing Board. The Act places a duty on the Licensing Board to aim to permit the use of premises for gambling in so far as the Board thinks the application is in accordance with:

- this Policy Statement
- the Commission's Guidance
- the Codes of Practice, and
- where the application is reasonably consistent with the licensing objectives.

As these are the criteria against which an application is to be assessed, representations which address these issues are more likely to be accepted and given weight.

13.14 All representations must be in writing and must be received by the Board within the time limits set by the relevant regulations (normally 28 days from the date the application was received). For a representation to be relevant it should:

- Be positively tied or linked to particular premises, and
- Relate to the licensing objectives (set out at Paragraph 1.3 of this Statement), or

- Raise issues under this policy, the Gambling Commission’s Guidance or Codes of Practice.

13.15 Representations relating to an application should indicate why an application is not “reasonably consistent” with the licensing objectives, or not in accordance with this Policy, the Commission’s Guidance or the relevant Codes of Practice- or why the local risk assessments are not considered suitable and sufficient, or why the application should only be granted subject to certain conditions. It is in the interests of those making representations that they include as much detail and evidence as possible at the time the representation is made. Further information is provided at Paragraphs 13.19 and 13.23-13.24 of this Statement in relation to the content of representations relative to the licensing objectives. Similarly, applicants (and licence holders) should be prepared to explain to the Board how they intend to address or mitigate any risks identified in representations.

Objective 1: Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

13.16 The Gambling Commission will take a leading role in preventing gambling from being a source of crime. Its Guidance envisages that attention is paid to the proposed location of gambling premises in terms of this licensing objective.

13.17 The Board recognises the Gambling Commission’s distinction between disorder and nuisance, disorder meaning activity, which is more serious and disruptive than mere nuisance. The Board will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, to assess a disturbance.

13.18 In considering licence applications, the Board will particularly take into account the following:-

- the design and layout of the premises;
- the training given to staff and crime prevention measures appropriate to those premises;
- physical security features installed in the premises, which may include matters such as position of cash registers or the standard of CCTV installed in the premises;
- where premises are subject to age restrictions, the procedures in place to conduct age verification checks; and
- the likelihood of any violence, public order or policing problem if the licence is granted.

13.19 The Board will, in relation to this Licensing Objective, give due weight to any representations received in respect of an application from Police Scotland (including evidence of gambling as a source of crime or disorder, being associated with crime or disorder or used to support crime), and the other relevant authorities when making decisions in this regard. The Board may consider whether specific controls, such as a requirement for the provision of door supervisors, need to be applied in order to prevent premises being a source of crime or used to support crime, causing adverse consequences for the localities in which premises are located, in order to ensure reasonable consistency with this Licensing Objective. Applicants would be expected to demonstrate how they will address and mitigate any risks identified in relation to this Licensing Objective.

Objective 2: Ensuring that gambling is conducted in a fair and open way

13.20 The Gambling Commission has stated that it would generally not expect licensing authorities to be concerned with ensuring that gambling is conducted in a fair and open way as this will relate either to the management of the business, therefore subject to an operating licence, or to an individual and therefore subject to a personal licence. The Board recognises that both of these matters are the responsibility of the Gambling Commission.

Objective 3: Protecting children and other vulnerable persons from being harmed or exploited by gambling

13.21 The Board considers that this objective, insofar as relating to children, includes preventing children from taking part in gambling unlawfully (as well as advertising likely to be attractive to children not being displayed at a time when children are likely to be near the premises). The Board will consider, as suggested in the Gambling Commission's Guidance, whether specific measures are required at particular premises, with regard to this licensing objective as it relates to children. The Board will consult the Renfrewshire Child Protection Committee on any application where it considers there may be concerns over access for children or vulnerable persons. The Board is also aware of the Gambling Commission Codes of Practice as regards this licensing objective, in relation to specific premises.

13.22 As regards the term "vulnerable persons" it is noted that the Gambling Commission does not seek to offer a definition but states that it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who

may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs. The Board will consider this licensing objective on a case by case basis.

In doing so, the Board will give due weight to representations which highlight risks to this licensing objective.

- 13.23 The Board will judge the merits of each individual application before reaching a decision on it, including whether to impose conditions to protect children or vulnerable persons. Any controls which might be required may also depend on the type of premises being considered and, in particular, whether and to what extent children are allowed in those premises. Such conditions may require, particularly in relation to children: supervision of entrances; segregation of gambling areas from areas frequented by children; restrictions on advertising where children and/or vulnerable persons may be near premises, and supervision of gaming machines in non-adult gambling specific premises.

In respect of “vulnerable persons”, the Board will also have particular regard to representations relating to the internal layout of premises, as well as any concerns in relation to the location of applicant premises.

- 13.24 Representations should address why any conditions should be imposed to ensure the gambling activity on premises is “reasonably consistent” with the licensing objectives, with supporting evidence of any gambling related risks or harms relating to the premises or the area of the premises. For the assistance of those making representations, Appendices 3 and 4 contain details of schools and locations offering support to vulnerable people within Renfrewshire and maps of areas in Renfrewshire with a higher proportion of dependent children. Those making representations may consider referring to these Appendices in their representations, if they consider that premises in these areas require additional controls and applicants (and licence holders) should be prepared to demonstrate how they will address any identified concerns or mitigate the risks within the terms of their local risk assessments and in any submissions they may wish to make at any hearing before the Licensing Board.

Conditions on Premises Licences

- 13.25 Any conditions attached to licences will be proportionate and will be: -
- relevant to the need to make the premises suitable as a gambling facility;
 - directly related to the premises and the type of licence applied for;
 - fairly and reasonably related to the scale and type of premises; and
 - Reasonable in all other aspects

- 13.26 Decisions on individual conditions will be made on a case-by-case basis. The control measures, which the Board may consider imposing, include door supervisors and appropriate signage for adult only areas. Licence applicants will be invited to offer their own suggestions as to ways in which the licensing objectives can be effectively met (and require to share their local risk assessments with the licensing authority on an application for grant or variation of a premises licence, or upon a request by this licensing authority).
- 13.27 The Board may consider imposing specific conditions for buildings which are subject to multiple premises licences. Such conditions may include the supervision of entrances, segregation of gambling and non-gambling areas frequented by children, the supervision of gaming machines and the display of notices regarding age restriction.
- 13.28 The licensing authority will seek to avoid any duplication with other statutory/regulatory regimes where possible, including the statutory planning regime. The Board will also have regard to the Gambling Commission's guidance that it is extremely unlikely that they will need to impose additional conditions in relation to matters already dealt with by the mandatory conditions.

Door Supervisors

- 13.29 The Board will consider whether there is a need for door supervisors in terms of the licensing objectives relating to children and vulnerable persons and the prevention of crime.

14. Adult Gaming Centres

- 14.1 The Board will have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to demonstrate that there will be sufficient measures to ensure that persons under 18 years of age do not have access to the premises.
- 14.2 Sufficient measures that will be imposed as appropriate licensing conditions may include proof of age schemes, CCTV, door supervisors, supervision of entrances/machine areas, physical separation of areas, location of entry notices/signage and specific opening hours.

- 14.3 The measures detailed in 14.2 above are not exhaustive and are not intended to exclude other conditions in appropriate cases.

15. Family Entertainment Centres

- 15.1 The Board will have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to demonstrate that there will be sufficient measures to ensure that persons under 18 years of age do not have access to the adult only gaming machine areas.
- 15.2 Licence applicants will be invited as part of their application to offer their own suggestions upon measures to proactively mitigate risks to the licensing objectives. Sufficient measures that will be imposed as appropriate include CCTV, supervision of entrances/machine areas, physical separation of areas, location of entry notices/signage, specific opening hours, and measures/training for staff on how to deal with suspected school children on the premises.
- 15.3 The measures detailed in 15.2 above are not exhaustive and are not intended to exclude other conditions in appropriate cases.
- 15.4 In accordance with the Gambling Commission's Guidance, the Board will ensure that it is sufficiently aware of any conditions that apply to operating licences, for instance those covering the way in which the area containing the category C or higher machines, should be delineated.

16. Casinos

The Board has not passed a "no casino" resolution under Section 166 of the Act.

17. Bingo Premises

- 17.1 This licensing authority notes that the Gambling Commission's Guidance states that Licensing Authorities will need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences for that or those excluded areas.
- 17.2 In the unusual circumstance where an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises), it is not permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises.
- 17.3 Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises in order to prevent underage gambling. Where concerns are raised, the Board will consider attaching additional conditions to achieve the policy objectives set out at Chapter 18 of the Commission's current Guidance and to ensure the risk to the licensing objectives is minimised.

18. Betting Premises

- 18.1 The Act contains a single class of licence for betting premises. Different types of premises will require licensing, including betting offices on tracks that have a separate premises licence from the track licence. It is not permissible for the operator to offer gaming machines on a premises which is licensed for betting but not to offer sufficient facilities for betting.
- 18.2 Section 181 contains an express power for licensing authorities to restrict the number of self-service betting machines, their nature and the circumstances in which they are made available by attaching a licence condition to a betting premises licence or to a casino premises licence (where betting is permitted in the casino).
- 18.3 When considering whether to impose conditions to restrict the betting machines in particular premises, the Board will consider the ability of staff to monitor the use of machines by children and young people or by vulnerable persons.

19. Tracks

- 19.1 The Act contains rules which apply to applicants for a premises licence in relation to a track. The applicant need not hold an operating licence because the betting which is provided upon the track will be provided by other operators, who come on-course. Since those people will require the necessary operating licences, the Act allows the track operator to obtain a premises licence without also having to hold an operating licence. This track premises licence then authorises anyone upon the premises with the appropriate operating licence to offer betting facilities.
- 19.2 Tracks are different from other premises in that there may be more than one premises licence in effect, each covering a specified area of the track. In accordance with the Gambling Commission's Guidance, the Board will especially consider the impact of the third licensing objective in this area.
- 19.3 There may be some specific considerations with regard to the protection of children and vulnerable persons from being harmed or exploited by gambling, the need to ensure entrances to each type of premises are distinct and that children are excluded from gambling or betting areas where they are not permitted to enter.
- 19.4 Children and young persons will be permitted to enter track areas where facilities for betting are provided on days when events take place, although they are still prevented from entering areas where gaming machines (other than category D machines) are provided. A track premises licence does not automatically allow gaming machines to be provided, but gaming machines may be permitted where a pool betting operating licence is also held by the track owner. Premises licence applicants will have to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities.
- 19.5 Appropriate licence conditions may include proof of age schemes, CCTV, door supervisors, supervision of entrances/machine areas, physical separation of areas, location of entry notices/signage, specific opening hours and the location of gaming machines.
- 19.6 This list is not exhaustive and does not intend to exclude other conditions in appropriate cases.

Condition on Rules being displayed

- 19.7 In accordance with the Gambling Commission's Guidance, the Board will attach a condition to track premises licences requiring the track operator to ensure that the rules are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public.

20. Travelling Fairs

- 20.1 The Board will consider whether the application falls within the statutory definition of a travelling fair.
- 20.2 Where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the Board will decide whether the statutory requirement, that the facilities for gambling amount to no more than an ancillary amusement at the fair, is met.
- 20.3 The 27-day statutory maximum for the land being used for a fair per calendar year shall apply to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land.

21. Provisional Statements

- 21.1 Section 204 of the Act provides that a person may make an application to the licensing authority for a provisional Statement in respect of premises that he or she expects to be constructed, expects to be altered or expects to acquire a right to occupy. In accordance with the current Guidance issued by the Commission, a premises licence to use premises for gambling should only be issued in relation to premises that the Board can be satisfied are going to be ready to be used for gambling in the reasonable near future, consistent with the scale of building or alteration required before the premises are brought into use. The Board will consider, in relation to premises not yet ready for use for gambling, whether a provisional statement should be applied for, rather than a premises licence.
- 21.2 In terms of representations about premises licence applications following the grant of a provisional statement, no further representations from relevant authorities or interested parties will be taken into account unless they concern

matters which could not have been addressed at the provisional statement stage, or they reflect a change in the applicant's circumstances.

21.3 The Board may refuse the premises licence or grant it on terms different to those attached to the provisional statement only by reference to matters:-

- which could not have been raised at the provisional licence stage; or
- which, in the Board's opinion, reflects a change in the operator's circumstances.

21.4 The Gambling Commission's Guidance states that licensing authorities must not have regard to whether or not a proposal by an applicant is likely to be permitted in accordance with planning or building law.

22. Reviews

22.1 A premises licence may be reviewed by the Board of its own accord for any appropriate reason or following the receipt of an application for a review by an interested party or responsible authority. It is for the Board to decide whether the review should be carried out.

22.2 Section 200 of the Act provides that licensing authorities may initiate a review in relation to a particular class of premises licence or in relation to particular premises.

22.3 An application for a review may be rejected if the Board is of the view that the grounds on which the review is sought:-

- are not relevant to the principles that must be applied by the licensing authority in accordance with Section 153;
- are frivolous or vexatious;
- will certainly not cause the authority to revoke or suspend the licence or exclude, remove or amend a condition attached to the licence, or add a condition to the licence;
- are substantially the same as the grounds specified in an earlier application in respect of the same premises or are substantially the same as representations made in relation to the application for the premises licence.

- 22.4 In determining whether to exercise the power to reject an application for review, the Board will take into account the length of time that has elapsed since the making of the earlier application or since the making of the representation.

23. Unlicensed Family Entertainment Centre Gaming Machine Permits

- 23.1 Where the operator of a family entertainment centre (FEC) does not hold a premises licence but wishes to provide gaming machines, he or she may apply to the licensing authority for this permit. The applicant must demonstrate that the premises will be wholly or mainly used for making gaming machines available for use.
- 23.2 Unlicensed FECs will be able to offer only category D machines in reliance of a gaming machine permit. Any number of category D machines can be made available with such a permit. Permits cannot be issued in respect of vessels or vehicles.
- 23.3 The Board can grant or refuse a licence but cannot attach conditions to this type of permit.
- 23.4 The Board will expect the applicant to demonstrate that there are policies and procedures in place to protect children from harm. Harm is not limited to harm from gambling, but includes wider child protection considerations.

24. Prize Gaming Permits

- 24.1 The Act states that a licensing authority may prepare a statement of principles that they propose to apply in exercising their functions in considering applications for permits which in particular specifies matters that the licensing authority propose to consider in determining the suitability of the applicant for a permit.
- 24.2 The applicant should set out the types of gaming that he or she is intending to offer and should be able to demonstrate an understanding of the limits to stakes and prizes that are set out in regulations and should demonstrate that the gaming offered is within the law. In making a decision on the application for this permit the Board will have regard to any Gambling Commission Guidance.

25. Temporary Use Notices

- 25.1 Where a gambling operator does not hold a premises licence but wishes to use the premises temporarily for providing facilities for gambling he or she may apply for a temporary use notice which may only be granted if the applicant holds a relevant operating licence.
- 25.2 The legislation and the Gambling Commission's Guidance define premises as including "any place" and refer to a "set of premises". The Board will consider amongst other things, the ownership/occupation and the control of the premises when determining any particular case.
- 25.3 A set of premises may not be the subject of a temporary use notification for more than 21 days in a period of 12 months. In consideration of temporary use notice applications, the Board will apply any regulations made under the provisions of the Act.

26. Occasional Use Notices

- 26.1 Where there is betting on a track on eight days or less in a calendar year, betting may be permitted by an occasional use notice, without the need for a full premises licence.
- 26.2 The Board will ensure that the statutory limit of eight days in a calendar year is not exceeded and will consider the definition of a "track" in determining whether the applicant is permitted to avail him/herself of this notice.

27. Small Society Lotteries

- 27.1 A non-commercial society that runs a lottery where the income is below certain specified thresholds can register with the Licensing Board.

- 27.2 The financial limits that apply to these societies at the time of preparation of this Statement are that the proceeds from one individual lottery cannot exceed £20,000 and in a calendar year the total proceeds do not exceed £250,000. If these limits are likely to be breached, then the Society requires to apply to the Gambling Commission for a Lottery Operating Licence. Societies cannot hold both these permissions at the same time.

As the limits stated above have previously been consulted upon and could change, any person seeking to register a small society lottery should check the up to date limits on the Gambling Commission's website, at www.gamblingcommission.gov.uk or Renfrewshire Council's

Licensing Standards Officers at enforcement.licensing.cs@renfrewshire.gov.uk, who will be able to provide further information.

- 27.3 Registration requires the Society to name a person responsible for the promotion of the lottery and to submit lottery returns within three months of the date of the (last) lottery draw. Should that person no longer be responsible for promoting the lottery, then the Society is required to notify the licensing authority and name a new promoter as soon as possible.

28. Declaration

- 28.1 The Board declares that, in producing its policy statement, it has had regard to the Licensing Objectives set out at Paragraph 1.3, the Guidance issued by the Gambling Commission and the responses received from those consulted in the preparation of the Statement.

LIST OF CONSULTEES

1. All Renfrewshire Licensing Board Members
2. All Renfrewshire Council Elected Members
3. Renfrewshire Council Chief Executive
4. All Renfrewshire Council Directors
5. All Gambling Premises Licence Holders within Renfrewshire
6. The Gambling Commission
7. Chief Constable, Police Scotland
8. The Chief Fire Officer, Scottish Fire and Rescue
9. HM Revenue and Customs National Registration Unit*
10. Church of Scotland, 121 George Street, Edinburgh
11. Diocese of Paisley, Diocesan Office, Cathedral Precinct, Ingle Street, Paisley
12. Betting and Gaming Council, 1st Floor, 90 Chancery Lane, London, WC2A 1EU
13. All Renfrewshire Community Councils
14. Renfrewshire Child Protection Committee
15. General Secretary, Scottish Trades Union Congress, 333 Woodlands Road, Glasgow, G3 6NG
16. Renfrewshire Chamber of Commerce, Bute Court, St. Andrew's Drive, Paisley, PA3 2SW
17. Scottish Enterprise
18. Gamcare, 1st Floor, 91-94 Saffron Hill, London, EC1N 8QP
19. Gamblers Anonymous Scotland, St Columbkilles Halls, 2 Kirkwood Street, Rutherglen, Glasgow, G73 2SL
20. Renfrewshire Family Group Conference Service, Women & Children First
21. Paisley YMCA, 39 High Street, Paisley, PA1 2AF
22. Young Persons' Representatives (c/o Children's Services)
24. All Local Partnerships
25. All Tenants' and Residents' Associations
26. Federation of Local Associations in Renfrewshire*
27. Renfrewshire Community Planning Partnership, c/o Committee Services
28. Renfrewshire Citizens' Advice Bureau
29. Greater Glasgow and Clyde NHS Board
30. Renfrewshire Community Safety Hub
31. Renfrewshire Alcohol and Drug Partnership
32. DEAR Group (Diversity and Equality Alliance Renfrewshire)
33. Disability Resource Centre
34. Engage Renfrewshire
35. LGBT+ Renfrewshire
36. Members of the Scottish Youth Parliament (per Fiona Taylor)
37. PACHEDU
38. Renfrewshire Access Panel
39. Renfrewshire Effort to Empower Minorities (REEM)
40. Renfrewshire Interfaith Group
41. Family PL Renfrewshire
42. Renfrewshire Youth Voice (per Fiona Taylor)
43. Reaching Older Adults in Renfrewshire
44. Soroptimist Paisley
45. West of Scotland Regional Equality Council (WSREC)
46. Women's Aid
47. YouFirst Advocacy

- 48. NHS Greater Glasgow & Clyde
- 49. Renfrewshire Council Head of Child Care and Criminal Justice
- 50. Renfrewshire Health and Social Care Partnership

*Members may wish to note that correspondence sent to the National Registration Unit (9, above) was returned to the licensing authority and that the members of the Federation of Local Associations (26, above) were consulted individually.

CURRENT GAMING MACHINE CATEGORIES AND ENTITLEMENTS

Category of machine	Maximum stake (from April 2019)	Maximum prize (from Jan 2014)
A	Unlimited – No category A gaming machines are currently permitted	Unlimited – No category A gaming machines are currently permitted
B1	£5	£10,000 [†]
B2	£2	£500
B3A	£2	£500
B3	£2	£500
B4	£2	£400
C	£1	£100
D – non-money prize	30p	£8
D – non-money prize (crane grab machines only)	£1	£50
D – money prize	10p	£5
D – combined money and non-money prize	10p	£8 (of which no more than £5 may be a money prize)
D – combined money and non-money prize (coin pusher or penny falls machines only)	20p	£20 (of which no more than £10 may be a money prize)

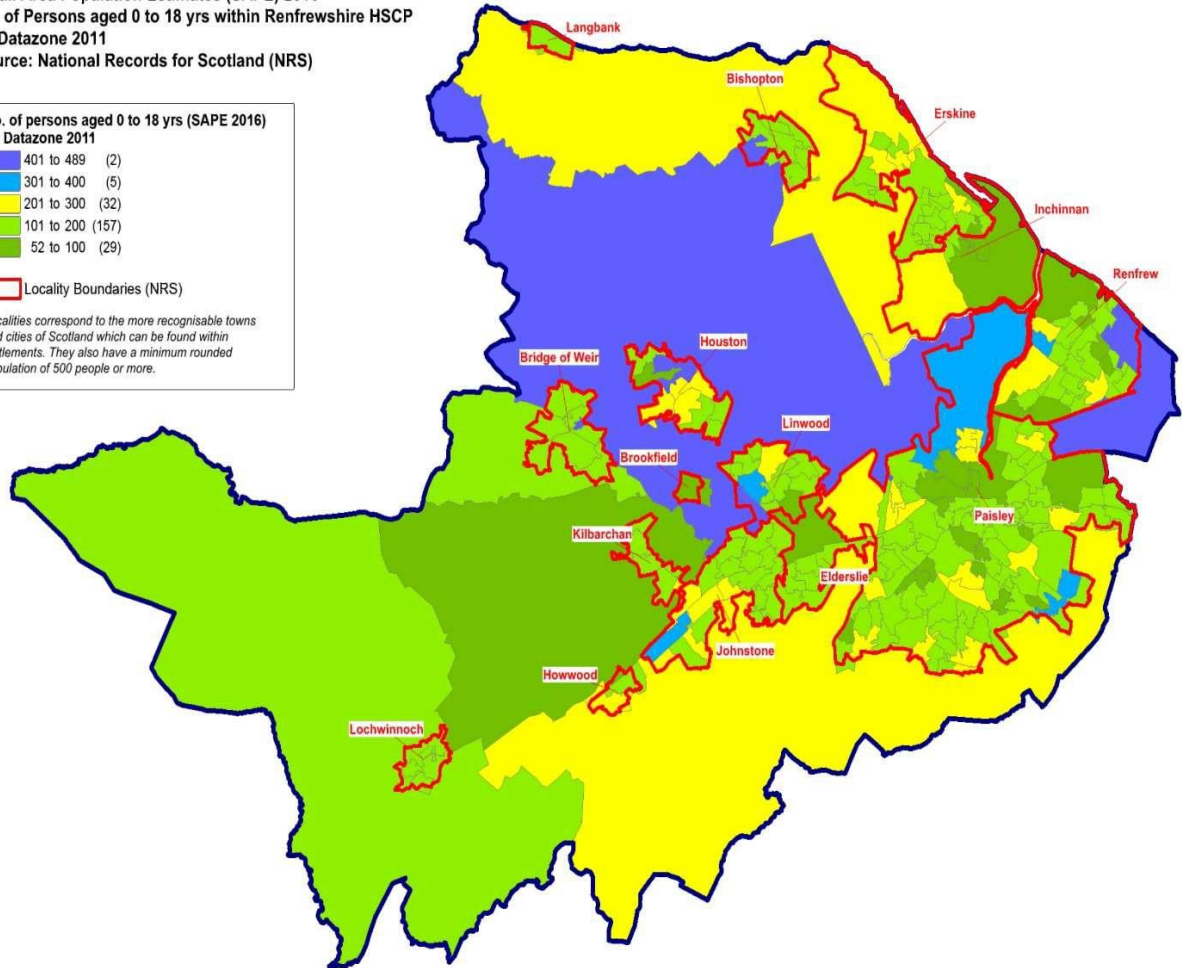
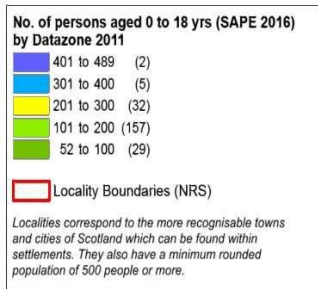
Note- As these limits may change from time to time, operators or other parties should refer to the Gambling Commission's website for updates to the above information.

APPENDIX 3

LOCATIONS OF HOUSEHOLDS WITH DEPENDENT CHILDREN

Map 1

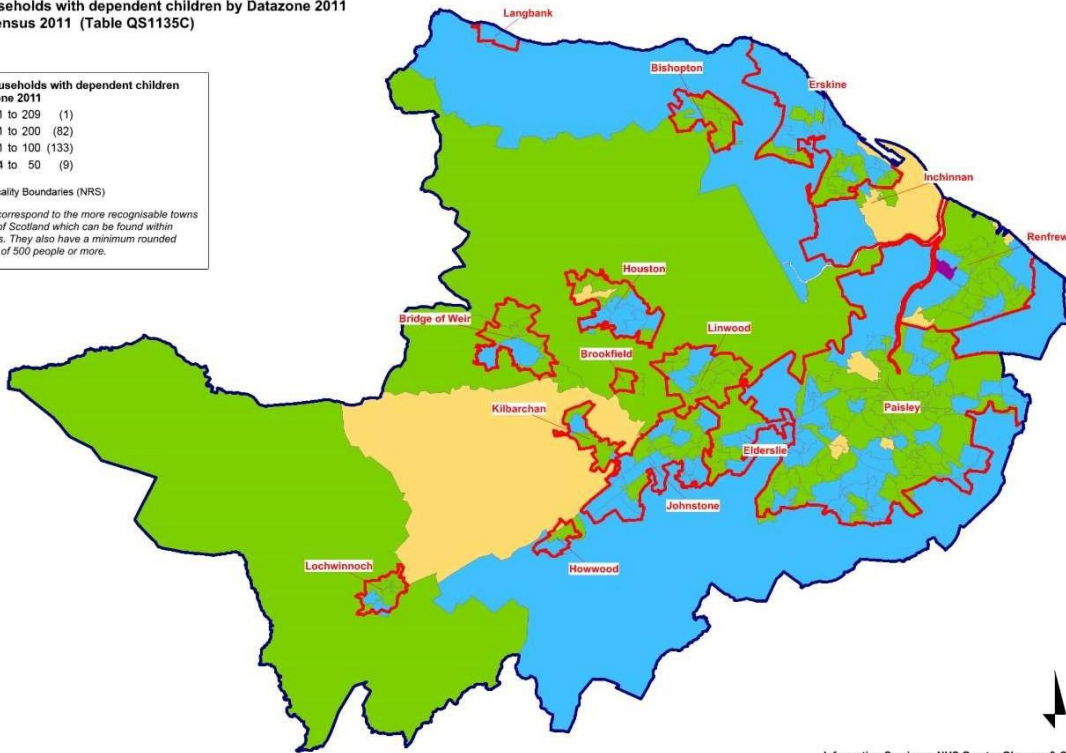
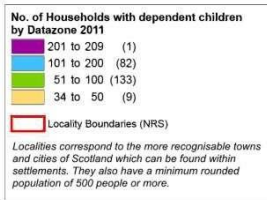
Small Area Population Estimates (SAPE) 2016
No. of Persons aged 0 to 18 yrs within Renfrewshire HSCP
by Datazone 2011
Source: National Records for Scotland (NRS)



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Map 2

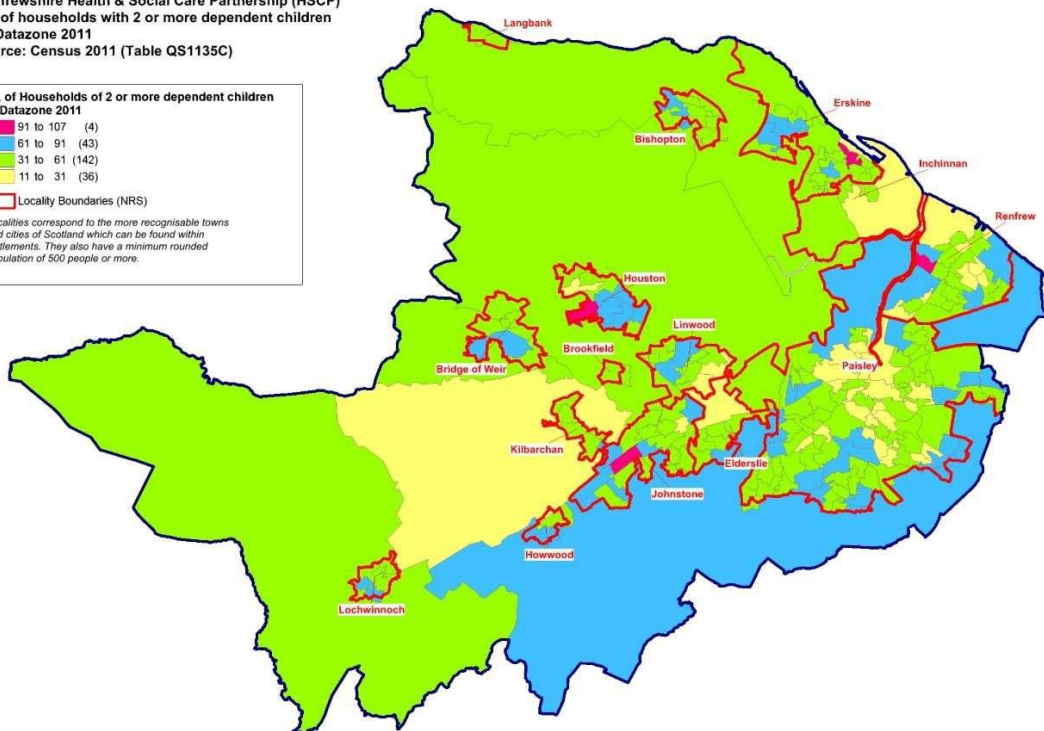
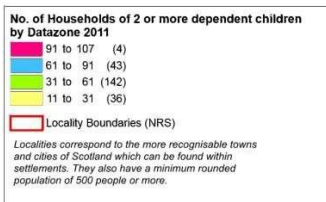
NHS GREATER GLASGOW & CLYDE
 Renfrewshire Health & Social Care Partnership (HSCP)
 No. of households with dependent children by Datazone 2011
 Source: Census 2011 (Table QS1135C)



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Map 3

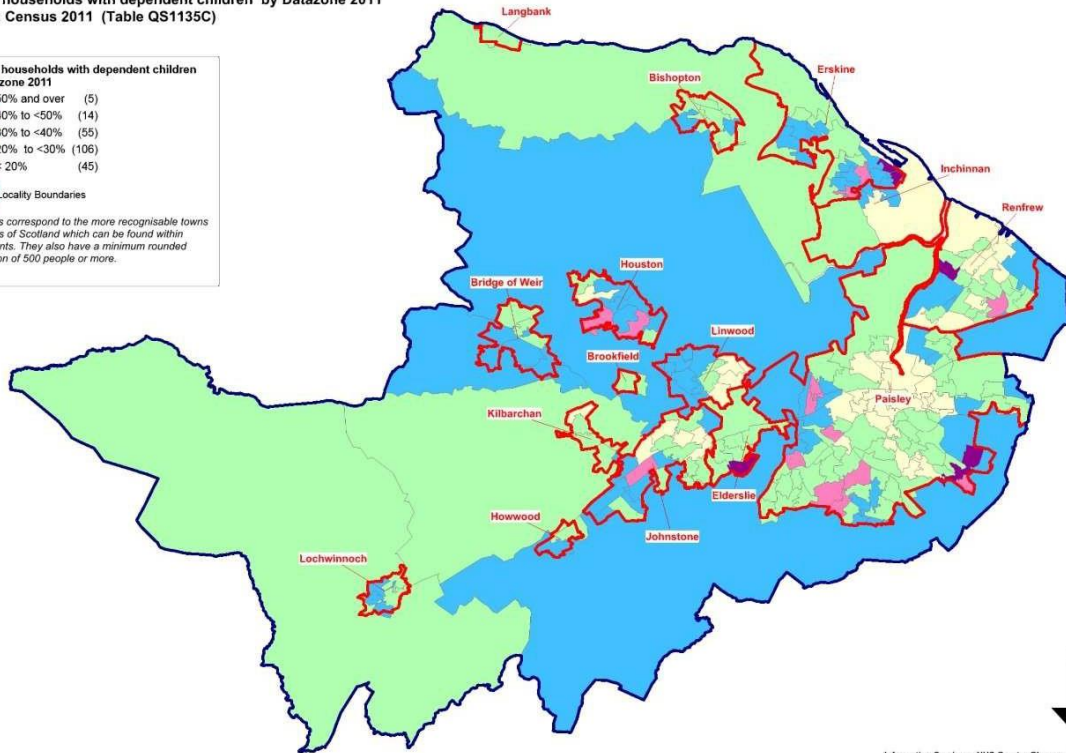
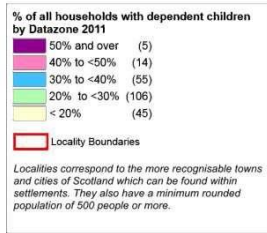
Renfrewshire Health & Social Care Partnership (HSCP)
 No. of households with 2 or more dependent children by Datazone 2011
 Source: Census 2011 (Table QS1135C)



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Map 4

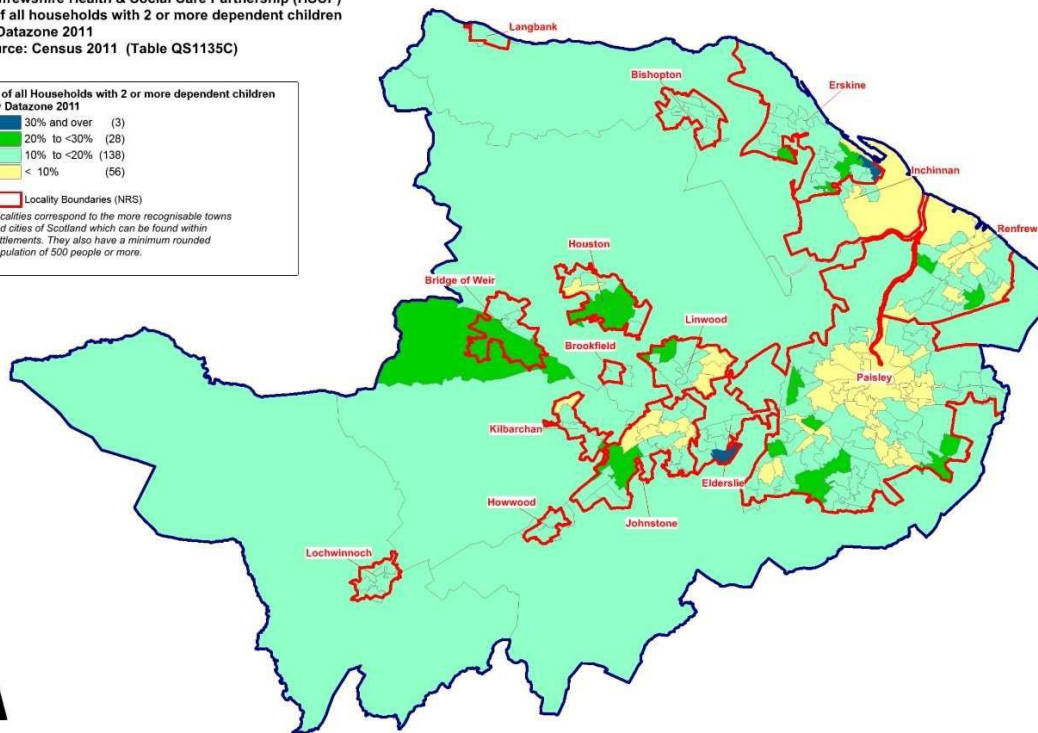
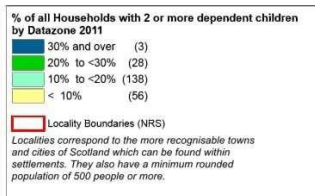
Renfrewshire Health & Social Care Partnership (HSCP)
 % of all households with dependent children by Datazone 2011
 Source: Census 2011 (Table QS1135C)



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Map 5

Renfrewshire Health & Social Care Partnership (HSCP)
 % of all households with 2 or more dependent children by Datazone 2011
 Source: Census 2011 (Table QS1135C)



P.B. (08/08/2018) Information Services - NHS Greater Glasgow & Clyde
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LOCATIONS OF SCHOOLS, CENTRES FOR CHILDREN AND YOUTH
ACTIVITIES, REGISTERED CARE SERVICES, VOLUNTARY AGENCIES, ETC

Information on the early learning and child care services, primary schools and secondary schools in Renfrewshire, including their location, can be accessed via the link below:

<http://www.renfrewshire.gov.uk/schools>

People with a gambling addiction can undertake treatment at the RCA Trust at premises at 8 Ince Street, Paisley, PA1 1HP

Counselling is provided by Gamblers Anonymous in Ralston Community Centre, Allanton Avenue, Paisley, PA1 3BL.

Details of registered care homes for children/older adults and vulnerable adults can be obtained at the following link: www.careinspectorate.com

Renfrewshire HSCP provide mental health outpatient services within the following venues:

Charleston Centre, Neilston Road, Paisley PA2 6LY.

Dykebar Hospital, Grahamston Road, Paisley, PA2 7DE

Mile End Mill, 12 Seedhill Road, Paisley PA1 1JS

Royal Alexandria Hospital. Corsebar Road, Paisley, PA2 9PN.

Renfrewshire Learning Disability Services provide services within the following venues:

Anchor Centre (Anchor Service and Flexicare) - 51-55 Stock St, Paisley PA2 6NG

Milldale Day Opportunities - On-X Leisure Centre, Brediland Rd, Linwood PA3 3RA

Mirin Day Opportunities - Lagoon Leisure Centre, 11 Christie St, Paisley PA1 1NB

Paton's Resource Centre (Community Networks) - Cartside Avenue, Johnstone, Renfrewshire, PA5 8RN

Spinners Gate Resource Centre (Gateway ISS and Autism Connections) - Maxwellton Road, Paisley, PA1 2RH

Weavers Linn Respite, 65 Glenburn Rd, Paisley PA2 8TJ

Renfrewshire HSCP provide addiction services within the following venues:

Back Sneddon Centre, 20 Back Sneddon Street, Paisley, PA3 2DJ

CIRCLE, 81 Glasgow Rd, Paisley, PA1 3PE

New Sneddon Street Clinic, 8 New Sneddon Street, Paisley, PA3 2AD

Torley Unit Centre, Dykebar Hospital, Grahamston Road, Paisley, PA2 7DE

DETAILS OF COMMUNITY-BASED YOUTH SERVICES

Renfrewshire Council's Adult and Family Learning Service deliver Adult Literacies and Family Learning Programmes to vulnerable children, adults and families in the following communities:

- West Johnstone Learning Centre (part of the West Johnstone Joint Campus)
- Foxlea Learning Centre (Foxbar)
- Moorpark Learning Centre (part of the Moorpark Joint Campus Renfrew)
- Glenburn Learning Centre
- (Bargarran Learning Centre (Part of Bargarran Community Centre)

Renfrewshire Council's Youth Services currently support the following community-based youth work activities and projects to vulnerable and young people who experience barriers to participation. These groups are offered at the following community youth spaces and venues:

- Foxbar Youth Drop In: and Youth Groups, Duke of Edinburgh Open Group, LGBTQi
- Gozone (part of Glenburn Learning Centre): Youth groups, Climate Change Champions
- Bargarran Youth Space (Bargarran CC): Youth Groups, Erskine Youth Council
- Youth Services Office in West Primary School: Youth Groups, Renfrewshire Youth Voice, Members of Scottish Youth Parliament
- Mary Russell School: Senior and Junior Youth Clubs
- Riverbrae School: Senior and Junior Youth Clubs

Consultation Responses

- (i) Police Scotland
- (ii) The Entail Group
- (iii) GamCare

From: Harris, Jon [REDACTED]
Sent: Sunday, July 14, 2024 2:43 PM
To: licensing.cs (CSAlias10) <licensing.cs@renfrewshire.gov.uk>
Subject: Renfrewshire Licensing Board- Consultation on Statement of Gambling Principles [OFFICIAL]

OFFICIAL

Good afternoon,

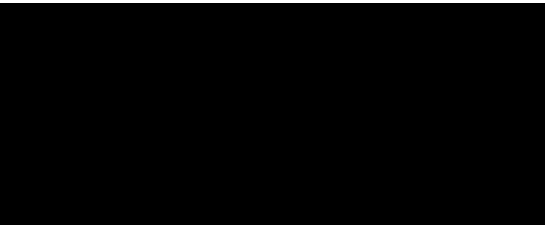
Thank you for the opportunity to respond to your consultation on the Statement of Gambling Principles, I shall provide a response on behalf of the Chief Constable of the Police Service of Scotland.

I have reviewed the current Statement of Principles and my only observation regarding taking this forward for the next period is the relevance of continuing to mention Covid-19 in Appendix 4 and whether this paragraph needs removed, or amended. Otherwise, I see no obvious errors or omissions that I would wish to raise.

Best regards

Jon

Supt. Jon Harris K816 (He/Him)[Why is this here?](#)
Partnerships & Preventions
Renfrewshire, Inverclyde, Argyll and West Dunbartonshire
Paisley Police Station Dumbarton Police Station
Mill Street Stirling Road
Paisley Dumbarton
PA1 1JU G82 3PT



Scottish Co-ordinator for The Society of Evidence Based Policing - www.sebp.police.uk

OFFICIAL

Date: 03/10/2024

Our Ref: GAM/SOP/IR

Douglas Campbell
Assistant Managing Solicitor
(Licensing) Corporate
Governance Finance and
Resources 1st Floor,
Renfrewshire Council
South Wing Renfrewshire
House
Cotton Street
Paisley
PA1 1TT



Renfrewshire and Inverclyde Division
Headquarters
Mill Street
Paisley
PA1 1JU

Dear Sir,

**GAMBLING ACT 2005 SECTION 349
RENFREWSHIRE LICENSING BOARD STATEMENT OF PRINCIPLES**

I refer to notification received of Renfrewshire Licensing Boards Statement of Principles regarding Gambling, which will run for the period 31st January 2025 to 30th January 2028. On reviewing the content, I fully support the Boards Policy and can confirm that Police Scotland are proactive in recognising the dangers and harm resulting from gambling.

The manifestations of Gambling Related Harm can have an adverse impact on the health and wellbeing of individuals, families, communities and society in general, be it through the loss of employment, bankruptcy or debt, the breakdown of relationships resulting in violence or other forms of domestic abuse, the increase in thefts or others forms of criminality to fund addiction, or the deterioration in physical and mental health of those affected.

Following the identification of Gambling Related Harm being present in several incidents dealt with by Police in recent years, Renfrewshire and Inverclyde Policing Division were chosen to participate in a Gambling Related Harm working Group. This included surveys, awareness training, supporting material, guidance, screening and partnership working. The work undertaken by our division was used to form a national Police Scotland Gambling Related Harm strategy to assist police officers and staff when encountering vulnerable individuals who suffer from Gambling Related Harm.

In addition, our Divisional Policing Licensing Department have obtained from the local authority, an up-to-date list of premises in the Renfrewshire area whose function is to provide a venue for the direct or indirect purpose of gambling. Those

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premises will continue to be regularly inspected, ensuring compliance with the statutory licensing objectives set, especially with regards to the protection of children and other vulnerable persons from harm. Should any identified premise fail to adhere to the statutory licensing objectives set, be it under the Gambling Act 2005 or Licensing (Scotland) Act 2005, management and staff of premises will be dealt with accordingly and premise and personal licence reviews will be submitted where warranted.

I hope the above gives reassurance to the Board of the continued support which will be provided by Police Scotland in assisting partners to tackle the harm attributed to gambling in the local authority area.

Yours faithfully



Gordon McCreadie
Chief Superintendent
Divisional Commander

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From: Kevin Williams [REDACTED]
Sent: Thursday, July 18, 2024 4:28 PM
To: licensing.cs (CSAlias10) <licensing.cs@renfrewshire.gov.uk>
Subject: RE: Gambling Consultation Letter

Hi Licensing, I do not see any changes that required to your Gambling Policy, however, should you plan to make any could I please have sight of them before they are agreed by committee as we may wish to add some comments

Best regards

Kevin Williams
National Licensing Manager (UK & Ireland)

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M [REDACTED]
[REDACTED]

One Stratford Place, Montfichet Road, London, E20 1EJ



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LADBROKES CORAL
GROUP

GamCare's response to Renfrewshire Council – Consultation on the revision of statement of principles under the Gambling Act 2005

About GamCare:

GamCare is an independent charity and the leading provider of information, advice, and support for anyone affected by gambling harms. We operate the National Gambling Helpline, provide structured support for anyone harmed by gambling, and create awareness about safer gambling and treatments. For 26 years, our confidential, non-judgemental services, have supported more than half a million people to get their lives back on track.

We hold data locally and nationally through our National Gambling Helpline. We also work closely with those who have lived experience in shaping and delivering our services and programmes, ensuring that all our work is coproduced with our lived experience community at its heart.

GamCare's comments on the revision of the statement of principles:

- We welcome the position Renfrewshire Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles.
- Local authorities can play a greater role in reducing gambling harm, particularly for those of our clients who experience harm in land-based gambling venues, due to council's licensing responsibilities.
- It is vital that Renfrewshire Council develops a local picture of the level of gambling harms, in order to best target resources and tailor service provision. This could be achieved by gathering data from the National Gambling Helpline, as well as those already providing services in the area.
- Building on the proactive approach the council is already taking, we would like to see Renfrewshire District Council continue to commit in its statement of principles **to a public health approach** to gambling.
- This commitment should include training frontline and primary care staff to recognise the signs of gambling harm and develop referral pathways to the National Gambling Helpline or local treatment providers. GamCare has worked with Haringey Council to implement a similar system, that has received widespread support.
- In the absence of Cumulative Impact Assessments as a method by which the "aim to permit" approach can be challenged, Renfrewshire District Council should continue to pursue a [Local Area Profile](#) approach that specifically analyses gambling risk, and use this data as a basis from which to scrutinise and possibly oppose a licensing application.
- The changes to Renfrewshire District Council's statement of principles should be viewed in the context of the Gambling Act Review and subsequent process of white paper consultations, so take account of the rapidly changing regulatory environment.

If you have any questions or would like to discuss in more detail, please contact Pollyanna Hopkins, Senior External Affairs Officer: [REDACTED].