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Our Ref: CTOC12113069/IG/JJ  
Your Ref:  
Date: 09 March 2006

Dear Jill,

**Re: - Consultation: Gambling Act 2005 (Licensing Authority Policy Statement)  
(England and Wales) Regulations**

As the ACPO lead for Gaming I would like to take this opportunity to thank you for consulting the Police Service on the content of the Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations.

As part of the consultation process I circulated a copy of your document to all Police Forces within England and Wales for their attention, consideration and comment. I have considered all comments and views that I have received back from Forces and have included relevant responses within this reply.

In relation to the options put forward regarding the regulations, I support options 3 and 4 which impose minimum statutory requirements on all licensing authorities whilst allowing for amendments emerging from public consultation. These options fully achieve the desired objectives of providing transparency, a certain level of consistency and minimal bureaucracy whilst allowing for an amount of flexibility according to local needs.

I fully support the requirement to designate a body to advise the authority about the protection of children from harm (Section 5 (a)), but I believe that the regulations should lay a statutory responsibility on the identified body to provide the necessary support that is required.

Section 4-(2) (b) requires the authority to produce a list of the persons whom it has consulted in preparing the statement. I feel that, although not exhaustive, the regulations should identify key stakeholders that must be included within the consultation process. Key stakeholders should include agencies such as the police, fire service, crime and disorder reduction partnerships, drug action teams and critically local communities. This local consultation process will compliment the Neighbourhood Policing agenda, which as you will be aware is currently being rolled out nationally.

One area of concern for the police is the level of commitment and priority that local authorities will be placing on enforcement and prosecution of offences within gaming establishments. As ACPO lead I will be addressing these concerns at a national level, but I will also be encouraging local forces to include them as part of their involvement in local consultation with the licensing authority under Section 4-(2) (b). I will also be raising this area of concern in my feedback to the Gambling Commission in relation to their draft guidance to Licensing Authorities, which is also out for consultation.

Thank you once again for seeking the views of the Police Service in this consultation process and I look forward to working closely with you in the future.

Yours sincerely,

Ian Ackerley  
ACPO Gaming Lead and Assistant Chief Constable of Staffordshire Police.