

Comments on Gambling Act 2005 (Licensing Policy Statement) (England and Wales) Regulations 2006

The following outlines Camden's issues around the Draft *Gambling Act 2005 (Licensing Policy Statement) (England and Wales) Regulations 2006*:

Section 5 (b) - Principles to be applied when determining whether a person is an interested party.

We disagree with the requirement that we should include principles in our policy around how we determine who an interested party is. We feel that including such a statement may inhibit the ability of some groups to make representations. As an alternative, we would rather have the flexibility to determine who an interested party is on a case-by-case basis.

Section 5 (d) – The principles to be applied by the authority in respect to inspection of the premises.

We are concerned that we will not have the necessary information available from the Gambling Commission to include a detailed statement around enforcement at the time the Licensing Policy is being drafted. Accordingly any 'principles' around enforcement will need to be high level and most likely detailed in a separate policy document produced once the required information is available.

Section 7 - Procedure to be followed when preparing or publishing a statement or revision

We question the need for this regulation, particularly in the light that (at the time) we will have recently finished a large consultation exercise seeking a number of stakeholders' views around the new gambling regime. We expect that most stakeholders will be aware of the impending gambling policy and do not think that an advertisement 2 weeks before the policy is published will significantly increase awareness. We would rather this issue be left to the local authorities' discretion to decide, if, how or when they publicise their gambling policy.

Section 5(b)(i) Where policies must be made available for inspection

We suggest that the word 'local' should be included in the below section to clarify exactly where the policies must be made available for inspection from.

'The [principle office] of the *local* authority.'

This change will ensure that the policies are available in the public area of the main or principle offices of the local authority and not the licensing authority, as Camden's Licensing Offices do not have public access.