

APPENDIX 2b

Licensing Section
West Suffolk

On behalf of: Forest Heath District Council
District Offices
College Heath Road
Mildenhall
Suffolk
IP28 7EY

St Edmundsbury Borough Council
West Suffolk House
Western Way
Bury St Edmunds
Suffolk
Ip33 3YU

14th September 2015

Dear Sir

Consultation on Forest Heath District Council & St Edmundsbury Borough Council Statement of Principles – Gambling Act 2005

Coral Racing Limited is most grateful to be given the opportunity to respond to this consultation exercise. Coral was one of the first national bookmakers to be licensed under the Betting and Gaming Act of 1960, and so has been operating the length and breadth of the UK for over 50 years. Its premises comprise locations in the inner city, on the high street, in suburbs and in rural areas, and in areas of both high and low deprivation. It now operates 1850 betting offices across Great Britain, which comprise about 20% of all licensed betting offices. It is, therefore, a highly experienced operator.

We have detailed below our response:-

Coral Racing Limited are generally supportive of the document but would like to make reference to paragraph 10.4 regarding the contents of the risk assessment (details below). Overall, the document again notes that the Board when considering applications are still required to 'aim to permit gambling' where this is 'reasonably consistent with the licensing objectives'. The introductory letter correctly states that the Council should not take into account any moral objections to gambling either.

Coral Racing Limited recognise the requirement to supply & update risk assessments with future applications, variations as well as local changes, following the consultation completion – effective date is from the 6th April 2016. Within paragraph 10.4 of the document, it is suggested that operators are required to risk assess the locality in terms of schools, churches and walking routes for schools. Whilst it is understood that the exact guidance issued by the Gambling Commission is still under consultation, the inclusion of such premises is presumptuous.

We will of course comply with the requirements of the Gambling Commission and Coral's experience is that, through all it does, it achieves an exemplary degree of compliance, and attracts negligible evidence of regulatory harm already. Through the additional local risk assessment to be introduced with future premises licence applications & variations from April 2016, Coral believe that these should be a) to assess specific risks to the licensing objectives in the local area, and b) to assess whether control measures going beyond standard control measures are needed. In other words, there should be no requirement to list specific locations that the council requires us to risk assess. Furthermore, whilst it is appreciated that each case will be judged on its merits, Coral knows of no evidence that the location of a licensed betting office within the proximity of such locations causes harm to the licensing objectives.



Coral Racing Limited
One Stratford Place, Montfichet Road, London E20 1EJ
Registered Office: New Castle House, Castle Boulevard, Nottingham NG7 1FT
Registered in England No. 541600
Tel: 020 3288 7000 Fax: 020 3288 7050

Coral knows of no evidence that children coming from schools are gaining access to betting offices. Coral's general experience, in common with other bookmakers, is that children are not interested in betting, and in any case the Think 21 policy operated by Coral is adequate to ensure that under-age gambling does not occur in their premises. There are very many examples of betting offices sited immediately next to schools and colleges across the country and no evidence whatsoever that they cause problems.

Additionally, walking routes to schools are naturally determined by the home locations of the children which change continually.

The reason for Coral's caution against making such perceptions, which we anticipate is similar to that of the other main bookmakers, is that it already operates systems which ensure that the licensing objectives are strongly promoted across its estate.

For example:

- Coral benefits from an operating licence granted by the national regulator, the Gambling Commission. Therefore, its corporate systems for the promotion of the licensing objectives have been approved by the Commission, which continues to exercise vigilance in this regard through inspections and examination of regulatory returns.
- Coral is subject to the Licence Conditions and Codes of Practice, which are effectively the national code of operation to ensure that the licensing objectives are promoted.
- It carries out health and safety risk assessments pursuant to its legal obligations. These assessments are shortly to be extended so that formal compliance assessments are conducted.
- It conducts risk assessments in relation to Exposure to Violence, Aggression and Conflict (EVAC assessments).
- It operates the assessment principles of the Safe Bet Alliance, the national code for safe premises. It was one of the architects of the code.
- It operates the ABB's Code for Responsible Gambling, and again was one of the architects of that code.
- It operates an extensive compliance manual, upon which all staff members are trained. Copies are available for your inspection if required.
- It contributes to the Responsible Gambling Trust, which seems to promote responsible gambling who in-turn contribute to GamCare, the national problem gambling charity.

If we can provide any further information, we would be pleased to do so.

Yours faithfully,



John Liddle
Director of Development – Coral Retail