

The Aberdeenshire Divisional Licensing Boards [North, Central and South Aberdeenshire] wish to make the following comments to supplement the consultation response that they have made online. These comments are not supported by evidence.

The Boards have concerns regarding online gambling and whilst they support the measures proposed to improve player protection and advertising, they are concerned about the growth of online gambling and how widely available this is. The Boards are particularly concerned about 'free bet promotions' which they feel induces and encourages gambling. The Boards are also concerned that this type of gambling and the advertising of these 'free bet promotions' targets vulnerable persons and children often in areas of social deprivation.

The Boards have significant concerns about on-line gambling and the protection of children and young persons who can easily gamble from their home computer or phone, and in particular skin gambling which the Boards feel entices children into gambling through playing on-line games.

The Boards are concerned that the proposals relating to the use of Fixed Odd Betting Terminals may not go far enough. Even reducing the maximum stake, there has to be some control over the number of plays that can be made, and the maximum amount of spend that can be conducted by the same person within a specified period of time.

Finally, the Boards do not consider that there are sufficient powers for enforcement within Scotland. The Gambling Act 2005 gave Licensing Standards Officer powers in respect of the Licensing Act 2003. This Act relates to England and Wales only. There are no powers of enforcement for Licensing Standards Officers in Scotland under the Licensing (Scotland) Act 2005. The Boards are in agreement with the SOLAR Licensing Group that there has to be a change to the primary legislation to enable proper enforcement in Scotland.