Section 25 of the GLA provides greater detail on the requirements for clubs.

The Code of practice for gaming machines in clubs and premises with an alcohol licence provides greater detail on matters that LAs should consider in exercising their functions.

LAs should bear in mind that, as gambling is not the primary activity in these venues, there may be a lack of awareness or knowledge of the requirements that may need to be addressed. Issues such as high staff turnover in seasonal premises may present an additional risk to the licensing objectives which an operator would be expected to mitigate.
Multi-activity sites – A quick guide for licensing officers

This guide is intended to assist local authority staff when considering applications for, and conducting inspections of, multi-activity sites. Examples include holiday camps and commercial clubs.

Typically, a premises may be subdivided into smaller areas and different activities provided in all, or a part, of the premises, often involving food, alcohol and different forms of gambling. Consequently, a variety of permissions and regulations will apply to each part and it is likely that children will be present in many of them.

In bingo licensed premises, under 18s cannot enter a room where category B and C machines are available. If the machines are in a segregated area, with a supervised physical barrier and appropriate signs to prevent unlawful entry, people under 18 can be in the remainder of the premises.

If an AGC is adjacent to the bingo area, direct access may not be provided between the two parts. LAs should satisfy themselves, when plans are submitted for an application or a variation, that they clearly show how the relevant requirements are met.

Key issues

Correct operator licences are required if any part of the premises is licensed for gambling, such as bingo or as an adult gaming centre (AGC). Mandatory and default conditions will apply and an LA must have regard to the relevant codes of practice.

The Act requires that one premises cannot be licensed to offer two gambling activities at the same time, such as bingo and betting. It is not unusual for different activities in the same area to attract different machine entitlements, including alcohol licences, family entertainment centres (FECs), AGCs and bingo.

It is worth checking, from the plans and a site visit, that the entitlements are not being exceeded and incorrectly accumulated, and that appropriate signage to prevent unlawful entry is in place where applicable.

For example, the automatic entitlement for up to two machines in alcohol premises cannot be added to the maximum number of machines allowed in the area licensed for bingo, if they occupy the same area.

Either the premises in question is a bingo premises, and should obtain those entitlements, or it is an alcohol premises, which has a different set of entitlements.

It may be necessary to determine, if an area shown in the plan as part of the ‘club’ premises is separated from another with an alcohol premises licence, that the machines intended to be made available in each part are within the respective, allowable limits.

The Annexes in the Guidance to Licensing Authorities (GLA) provide details of the entitlements.

Clubs can be distinguished by their characteristics and purpose. Members’ Clubs and Commercial clubs must have at least 25 members, be formed to operate permanently and for purposes not associated with gambling. However, a Members’ Club must be run by, and for the benefit of, members. A Commercial Club is run for a commercial profit or a private gain.

Depending on the permits held, different categories and numbers of gaming machines may be made available and different gaming activities made available.

The Annexes in the GLA provide details of the machine entitlements and gaming activities for clubs.