

APPENDIX 3

Consultee	Comment	Recommendation
Premises Licence holder – Paddy Power	Thanks Mark, no comment from us	No changes recommended.
Gamcare	<p>Thank you for your email, we appreciate your interest in our work.</p> <p>While we do not have the resources available to allow us to personally respond to each Local Authority which contacts us regarding their refreshed Statement of Principles, we have compiled a list of the issues or factors which we think it would be helpful to consider below, more information is available via the Gambling Commission.</p> <p>The function of the Statement is to reflect locally specific gambling concerns and to reflect the Council’s wider strategic objectives. The active use of the Statement is one means by which you can make clear your expectations of gambling operators who have premises in your area. This allows operators to respond to locally specific requirements and adjust their own policies and procedures as required.</p> <ul style="list-style-type: none"> • A helpful first step is to develop a risk map of your local area so that you are aware of both potential and actual risks around gambling venues. A useful explanation of area-based risk-mapping has been developed with Westminster and Manchester City Councils, which gives some guidance on those who may be most vulnerable or at-risk of gambling-related harm. For more information please see www.geofutures.com/research-2/gambling-related-harm-how-local-space-shapes-our-understanding-of-risk/ • Consider that proposals for new gambling premises which are near hostels or other accommodation or centres catering for vulnerable people, including those with learning difficulties, and those with gambling / alcohol / drug abuse 	<p>The comments are noted and appreciated, but no changes recommended.</p> <p>As stated in the policy the Licensing Authority does not have evidence suggesting any specific issues within its area or sufficient data with which to produce a suitably detailed local area profile.</p> <p>It is considered that primarily considering applications from GamCare Certified operators would imply that applications are not being considered on their merits and that those from non-GamCare Certified operators would be disadvantaged.</p>

	<p>problems, as likely to adversely affect the licensing objectives set out by the Gambling Commission. This is also relevant regarding the proximity to schools, colleges and universities.</p> <ul style="list-style-type: none"> • A detailed local risk assessment at each gambling venue – pertinent to the environment immediately surrounding the premises as well as the wider local area – is a good way to gauge whether the operator and staff teams are fully aware of the challenges present in the local area and can help reassure the Local Licensing Authority that appropriate mitigations are in place. • Does the operator have a specific training programme for staff to ensure that they are able to identify children and other vulnerable people, and take appropriate action to ensure they are not able to access the premises or are supported appropriately? • Does the operator ensure that there is an adequate number of staff and managers are on the premises at key points throughout the day? This may be particularly relevant for premises situated nearby schools / colleges / universities, and/or pubs, bars and clubs. • Consider whether the layout, lighting and fitting out of the premises have been designed so as not to attract children and other vulnerable persons who might be harmed or exploited by gambling. • Consider whether any promotional material associated with the premises could encourage the use of the premises by children or young people if they are not legally allowed to do so. <p>We would suggest that the Local Licensing Authority primarily</p>	
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	<p>consider applications from GamCare Certified operators. GamCare Certification is a voluntary process comprising an independent audit assessment of an operator’s player protection measures and social responsibility standards, policy and practice. Standards are measured in accordance with the GamCare Player Protection Code of Practice. If you would like more information on how our audit can support Local Licensing Authorities, please contact mike.kenward@gamcare.org.uk</p> <p>For more information on GamCare training and other services available to local authorities, as well as recommended training for gambling operators, please see the attached brochures.</p>	
<p>HMRC</p>	<p>As one of the responsible authorities quoted in your appendices can I ask you to amend our contact telephone number to 0300 322 7072 Option 7.</p> <p>Our email address remains the same, NRUBetting&Gaming@hmrc.gsi.gov.uk</p>	<p>Amendment to be made to HMRC contact details.</p>
<p>Gamble Aware</p>	<p>Due to the resource constraints on a small charity, we are not able to offer specific feedback on your policy. However, we do strongly commend two recent publications by the Local Government Association which set out the range of options available to local authorities to deal with gambling-related harms using existing powers.</p> <p>https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales</p> <p>We fully support local authorities which conduct an analysis to identify areas with increased levels of risk for any reason, but particularly where there are higher than average resident or visiting</p>	<p>No changes recommended.</p> <p>As stated in the policy the Licensing Authority does not have evidence suggesting any specific issues within its area or sufficient data with which to produce a suitably detailed local area profile.</p>

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	<p>populations from groups we know to be vulnerable to gambling related harm – children, the unemployed, the homeless, certain ethnic-minorities, lower socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services – and include additional licence requirements to mitigate this increased level of risk.</p>	
<p>Parish Council</p>	<p>Meopham Parish Council would like it recorded that they are in support of Gravesham Borough Council’s decision on a ‘no casinos’ resolution.</p>	<p>No changes recommended.</p>
<p>Regulatory Services Manager</p>	<p>The Regulatory Services Manager would, following advice from the local Gambling Commission Compliance Manager, seek to make the following corrections/amendments to the draft policy:</p> <ol style="list-style-type: none"> 1. On page 4, add the wording, ‘Operators will therefore need to ensure that their local risk assessments are kept on the premises to enable it to be produced to an authorised officer upon request and to better ensure that staff have access to, and are familiar, with it.’ At the end of section 6. 2. On page 9, remove the wording, ‘The Gambling Commission will also be responsible for compliance regarding unlicensed premises’ as this is not the case and appears to be an historical error; all matters pertaining to premises are the responsibility of the LA, including leading on unlicensed premises (though advice can be sought from the GC on how to deal with these). 3. On page 10, clarify that FEC Permits are for people who only wish to make Category D gaming machines available. 4. Remove Appendix 7, table of gaming machine stakes and prizes, as they are subject to ongoing changes, and 	<p>The changes proposed are as outlined in bullet points numbered 1 to 4 adjacent.</p>

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	<p>instead direct people to the Gambling Commission website where they can find an up to date list by inserting the text, 'full, up to date details, are available on the Gambling Commission website - https://www.gamblingcommission.gov.uk/home.aspx' where reference to gaming machines stakes and prizes are contained within the policy</p> <p>5. Replace the text and map in section 5 on page 2 with a link to the council's Community Profile webpage to ensure that people are directed to the most up to date and comprehensive information available (online at http://www.gravesham.gov.uk/home/about-the-council/policies-strategies-open-data/transparency-and-open-data/community-profile)</p>	
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