

Appendix 6

Responses to consultation on proposed Gambling Act 2005 statement of principals

Response 1

From: Catherine Sweet

Sent: 16 July 2019 16:55

To: Rendell, John <J.Rendell@somersetwestandtaunton.gov.uk>

Subject: Consultation on draft of new Gambling Act 2005 statement of licensing principals

Hello,

Thank you for your email, we appreciate your interest in our work.

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](#).

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.

- 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 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.
- 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.

We would suggest that the Local Licensing Authority primarily consider applications from GamCare Certified operators. GamCare Certification (now being replaced by our [Safer Gambling Standard](#)) 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

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.

If there is anything else we can assist with please do let us know.

Kind regards,
Catherine

Catherine Sweet
Head of Marketing and Communications
T: 020 7801 7028



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Response 2

From: olivia.brady@hmrc.gov.uk [mailto:olivia.brady@hmrc.gov.uk] **On Behalf Of**
NRUBettingGaming@hmrc.gov.uk
Sent: 17 July 2019 12:14
To: Rendell, John <J.Rendell@somersetwestandtaunton.gov.uk>
Subject: RE: Consultation on draft of new Gambling Act 2005 statement of licensing principals

Good Afternoon

As one of the responsible authorities quoted in your gambling policy appendices I thought I should let you know our postal contact address is now:-

HM Revenue and Customs
Excise Processing Teams
BX9 1GL
United Kingdom

Our contact telephone number is now 0300 322 7072 Option 7.

Our email address remain the same, NRUBetting&Gaming@hmrc.gsi.gov.uk

Kind Regards,

 | **BT &C | Excise Returns Team**
Portcullis House, Glasgow, G2 4PZ

✉ olivia.brady@hmrc.gov.uk

☎ 07870864499



Response 3

From: Carhampton Parish Council

Sent: 22 July 2019 08:18

To: Rendell, John <J.Rendell@somersetwestandtaunton.gov.uk>

Subject: Draft Gambling Policy

Good morning Mr Rendell

Before I presented the Draft Statement of Principles in relation to the Gambling Act 2005 to Members of the Carhampton Parish Council for their comments, I thought I had better read it.

I have come across a number of minor what I believe to be errors which you may wish to take on board although not issue a revised Draft at this stage.

Page 5 “Default condition” last line – “excluded by West Somerset Council” – should this be SWT?

Page 7, 5th main para, last sentence “In determining an application....”. This is repeated in the 2nd para of para 2.2 on page 10 and in para 4.2 on page 16.

Page 8 para 1.7 – both paragraphs have reference to West Somerset or West Somerset Council.

Page 11 para 3.1 The heading is Committee terms of reference but the text starts with “A Licensing Sub-Committee”. I have briefly read SWT’s Constitution and the minutes of the first meeting of the Licensing Committee and find that no sub-committee has yet been established. You may wish to reflect this situation in the text of this paragraph. This comment also applies to para 3.2 (2nd para) on page 12.

Page 18 para 4.6 (3rd para) – suddenly in this document the word “We” appears (2nd and 4th lines). I suspect this should be “The Council”.

Page 21 1st para on that page 2nd line – should read “the Licensing Committee **considers** their valid....”

Hope you find these comments useful.

Alan Hemsley
Clerk to the Parish Council
www.carhamptonpc.org.uk

Response 4

From: Andrew Hopkins
Sent: 23 July 2019 10:35
To: Rendell, John <J.Rendell@somersetwestandtaunton.gov.uk>
Subject: RE: Consultation on draft of new Gambling Act 2005 statement oflicensing principals

Hi John,

With this one, I have spotted the following:

1.7. West Somerset Council is written down rather than SWT

1.8 and Appendix D can a reference to 'Business Improvement Districts' be added?

Many thanks,
Andrew

Andrew Hopkins
Minehead BID Manager