

Consultee	Officer response
<p>HM Revenue & Customs</p> <p>Dear Colleague</p> <p>As one of the responsible authorities quoted in your appendices can I ask you to amend our postal contact address to:-</p> <p>HM Revenue and Customs Excise Processing Teams BX9 1GL United Kingdom</p> <p>Our contact telephone number is now 0300 322 7072 Option 7.</p> <p>Our email address remain the same, NRUBetting&Gaming@hmrc.gsi.gov.uk</p>	<p>Policy statement updated</p>
<p>Cllr Paul McCloskey</p> <p>I noted with interest, the following item in the policy:</p> <p>Cheltenham Borough Council STATEMENT OF PRINCIPLES GAMBLING ACT 2005</p> <p>8.1 Interested parties can make representations about licence applications, or apply for a review of an existing licence. These parties are defined in the Act as follows:</p> <p>8.7 Likewise, parish councils likely to be affected, will be considered to be interested parties.</p> <p>And 8.6 mentions ward councillors. Can you assure me (and save me the time rummaging through them all!) that the definition of 'interested parties' as defined here in 8.6 & 8.7 is common across all the Licensing policies please?</p>	<p>Officers have responded to confirm that 'interested parties' is common across policy statements but interpretation could vary depending on the view an individual licensing authority will take.</p>
<p>GCC Public Health</p> <p>Many thanks for sending this through. I have sent the link onto the GCC councillors for Cheltenham, as required as part of the GCC motion on gambling-related harm from May.</p> <p>I hope it's OK if I also feedback a few comments.</p>	

<ul style="list-style-type: none"> • In relation to paragraph 4.1 and 4.2, I wondered whether it would be possible to alter paragraph 4.1 since a lot of gambling-related harm is unknown? Many people gamble and experience no adverse consequences. There are however some who do experience significant harm as a result of their gambling. National evidence suggests that 0.7% of people are problem gamblers. In addition individuals experiencing harm from gambling, or their families or carers, rarely present to health or social care services with problem gambling as their presenting condition, and it can manifest in a range of different ways, including physical and mental health problems, relationship breakdowns as well as social care and financial issues. • In relation to 5.2 I'm very sorry if I missed it but I wasn't quite sure what the 'relevant matters' were for consideration in a risk assessment. Some other Statement's I've seen list these (some in more detail than others) which I found quite helpful for thinking about licensing objectives. For example Gloucester's draft currently includes quite a long list (attached). Or Torbay had shorter version focusing on children and vulnerable adults (attached). Sorry again if these are elsewhere in the Statement and I missed them. 	<p>Paragraph 4.1 and 4.2 has been redrafted to take into account the comment.</p> <p>Appendix F has been updated to make "relevant matters" more explicit.</p>
<p>GamCare</p> <p>Hello,</p> <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>Comments noted.</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.

- 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 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.

Gambling Commission

Ref the SoP out for consultation. Some thoughts:

1. Page 3 – Figures are incorrect and relate to 2015
2. Page 4-Do you consider that more of a local steer might be appropriate regarding Local Risk assessments? While the requirement is to 'produce upon request' many LAs are inserting a requirement to have a copy on the premises.
3. Page 10 'The Commission's Relevant access provisions.....'. These provisions are in the Act as part of the mandatory & default licence conditions, rather than being 'imposed' by the Commission.
4. Page 27 – I don't understand the reference to the minister of state for transport in relation to DDCMS. Happy to be educated.

Figures updated.

Appendix F has been updated to make "relevant matters" more explicit.

Amendment made to clarify.

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