

## Appendix 2

### Gambling Statement - Schedule of Consultation Responses and Working Party Comments Consultation Period 14<sup>th</sup> May 2018 to 31 July 2018

	Consultee details	Consultee Comments	Working Party Assessment	Working Party Recommendation
1	<b>Councillor Whiteside</b>	I looked at the many paged 'Statement of Principles' and I couldn't find any principles in it at all. Lots of good detail - but no principles of how the SDC considers gambling, our understanding of the risks to vulnerable people and how we will use the principles to guide our licensing decisions. I hope this can be addressed.	<p>The layout of the Statement and the principles that should be included are laid out in the Act and the Gambling Commission Guidance. Stroud District Council's Statement covers all the required points.</p> <p>Stroud District Council's Statement gives a lot of detail in paragraph 2.3 about what this Council expects an applicant to include in their local risk assessment to ensure that vulnerable people are protected. Additionally paragraph 2.8 gives guidelines of the types of locations that may be inappropriate due to proximity to places frequented by young or vulnerable persons. Paragraph 2.17 gives a definition of vulnerable persons.</p> <p>The policy can be expanded to emphasize the risks to vulnerable persons and how this will be used to guide licensing decisions</p>	<p>Paragraph 2.8 is expanded to emphasize those applications for premises in locations frequented by children and vulnerable person are likely to adversely affect the licensing objective of protection of children and vulnerable persons.</p> <p>Paragraph 2.16 is expanded to state that gambling is a legitimate leisure activity enjoyed by many however some individuals do experience significant harm as a result of their gambling. The Gambling Commission have noted, in a briefing paper dated October 2017 called 'Gambling-Related Harm As A Public Health Issue', that harm can include higher levels of physical and mental illness, debt problems, relationship breakdown and in some cases criminality and substance misuse.</p>
2	<b>Wotton-under-Edge Town Council</b>	Wotton-under-Edge Town Council considers the consultation document to be well thought out and fully supports Stroud District Council's Statement of Principles therein.		No amendment required

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3	<b>Stroud Town Council</b>	<p>Thank you for a well written and easy to read document, particularly as proposed changes were highlighted in red.</p> <p>We have no observations other than to ask if the suggested consultation could be extended to the voluntary sector, including Your Circle, CAB, addiction counselling and Gamblers Anonymous.</p>	<p>Links to the consultation were sent to <a href="mailto:yourcircle@gloucestershire.gov.uk">yourcircle@gloucestershire.gov.uk</a>  <a href="mailto:advice@ca-scd.org.uk">advice@ca-scd.org.uk</a>  <a href="mailto:info@gamcare.org.uk">info@gamcare.org.uk</a></p> <p>Google searches found no suitable contacts to send consultation to Gamblers Anonymous</p>	<p>Consultee list in Appendix B of the draft Statement of Principles is updated</p>
4	<b>Nailsworth Town Council</b>	<p>Nailsworth Town Council welcomes SDC's amended Statement of Principles, with the increased focus on local conditions and risk assessments, and the protection of vulnerable members of our community.</p>		<p>No amendment required</p>
5	<b>Gamcare</b>	<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</p> <ol style="list-style-type: none"> <li>1. 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</li> </ol>	<ol style="list-style-type: none"> <li>1. Whilst this authority recognizes that a risk map of the local area may be beneficial for large urban areas such as Manchester and Westminster it is felt that, as there are only a very low number of Gambling Premises in Stroud District and resource is needed to create such a profile, that it is not required for our district.</li> </ol>	<p>Extra points added to paragraphs 2.3 and 2.8 of the draft revised statement to pick up Gamcare points relating to protection of children and vulnerable persons which are not already included</p>

		<p>harm. For more information please see <a href="http://www.geofutures.com/research-2/gambling-related-harm-how-local-space-shapes-our-understanding-of-risk/">www.geofutures.com/research-2/gambling-related-harm-how-local-space-shapes-our-understanding-of-risk/</a></p> <ol style="list-style-type: none"> <li>2. 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.</li> <li>3. 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.</li> <li>4. 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</li> </ol>	<ol style="list-style-type: none"> <li>2. Paragraph 2.8 of SDC's revised statement already covers many of these points but can be expanded to include all.</li> <li>3. Paragraph 2.3 of SDC's revised statement gives clear guidance on what this Council expects to be included in a premises local risk assessment</li> <li>4. Paragraph 2.3 SDC's revised statement explains that this Council expects a premises local risk assessment to include training records for staff such as how to recognize excessive gambling or vulnerable person</li> </ol>	
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		<p>appropriately?</p> <p>5. 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.</p> <p>6. 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.</p> <p>7. 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>	<p>5. Paragraph 2.3 SDC's revised statement explains that this Council expects a premises local risk assessment to include numbers of staff available on premises at any one time. But policy can be expanded to include adequate staff for key points through the day.</p> <p>6. Paragraph 2.3 can be expanded to include that this Council expects premises local risk assessment to ensure that 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</p> <p>7. Paragraph 2.3 can be expanded to include that this Council expects a premises local risk assessment to 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>	
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