From: East Bergholt Parish Council <east.bergholtpc@btconnect.com>

Sent: 25 September 2018 10:45 **To:** BMSDC Licensing Team

Subject: Consultation - Gambling Act 2005

Dear Licensing Team

I refer to your correspondence dated the 29th August 2018 relating to the consultation on the Gambling Act 2005.

The Parish Council has considered the details and makes the observation that having reviewed the document all that the Parish Council could see of any relevance was section 7 on Society Lotteries which contained nothing new or of interest to the Parish.

: https://www.babergh.gov.uk/assets/Licensing/Draft-BDC-Statement-of-Principles-2019-22.pdf

Many thanks.

With kind regards.

Susan

Susan Clements Assoc. CIPD FSLCC (CiLCA)
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From: Bridget Chamberlain <bri>bridget@berewykhall.co.uk>

Sent: 01 September 2018 15:02 **To:** BMSDC Licensing Team

Subject: Gambling Act 2005 - Statement of Principles

Categories: Yellow Category

Dear Sirs,

This is just to acknowledge that I have received your letter of 29th August and have gone online and read your Statement of Principles relating to the Gambling Act 2005.

The Essex & Suffolk Point to Point committee are happy with these principles and ensure that they are complied with at the three meetings that we hold at Higham each year. We would further like to point out that we are governed and regulated by the British Horseracing Association and the British Horseracing Levy Board which oversee all horseracing in the United Kingdom. I also have to apply to them for a licence to operate annually.

Yours sincerely Bridget Chamberlain Secretary Higham P2P **From:** Catherine Sweet <catherine.sweet@gamcare.org.uk>

Sent: 03 September 2018 16:21 **To:** BMSDC Licensing Team

Subject: Gambling Act 2005: Statement of Principles (Revision)

Hello,

Thank you for your letter regarding the above consultation, 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 <u>Gambling Commission</u>.

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
 https://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 <u>GamCare Certified</u> <u>operators</u>. 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 <u>mike.kenward@gamcare.org.uk</u>

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

E: catherine.sweet@gamcare.org.uk



Click here to sign up to our free, monthly e-newsletter

From: Matthew Taylor < Matthew.Taylor@racecourseassociation.co.uk>

Sent: 06 September 2018 10:53 **To:** BMSDC Licensing Team

Subject: Revision of Statement of Gambling Licensing Policy - Consultation

Dear Licensing Team

Revision of Statement of Gambling Licensing Policy - Consultation

Thank you for your letter regarding the Draft Statement of Gambling Principles for Babergh District Council.

We would advise you that we have no venues in your area, and therefore will not be responding to your document.

Kind Regards

Matthew Taylor
Racecourse Services Executive



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From: John Lambert

Sent: 03 September 2018 17:41 **To:** BMSDC Licensing Team

Subject: Statement of Principles consultation

Hiya, I have received your invitation to comment on your draft Gambling Act 2005 Statement of Principles, from a Social Care perspective.

My comments arise particularly from my responsibilities for the Housing Related Support programme which offers support for homeless or potentially homeless and marginalised adults, but my comments would be appropriate for all vulnerable adults. Within the draft Statement, you are clear that Children and Vulnerable People need to be protected from being harmed or exploited by gambling. This is a recurring principle across the statement – whether for gaming machines, casinos, betting premises, track premises or other.

However, the Statement says little about expectations in these areas – applicants should be asked to demonstrate how such people will be protected, beyond the provision of information leaflets/helplines – and even here the Statement only uses this as an example that may be included. Equally, under para 6.5 there are expectations that staff will have the ability to "monitor the use of machines byvulnerable people", but the Statement says nothing about appropriate training, or understanding of how staff should be able to recognise such vulnerability, and what your expectations as a Licensing Authority would be in these areas.

I hope these comments are helpful, but am happy to discuss in more detail if you need.

Best wishes,

John

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