

Appendix A: Summary of responses received and the Head of Public Services’s considerations

Respondent Details	Comments made	Response
<p>GamCare, 1st Floor, CAN Mezzanine Old Street, London, N1 6AH</p>	<p>Thank you for your letter regarding the above consultation, 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 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 	<p>This is a generic consultation response which has not considered the detail of the Policy presented. The Licensing Authority is aware of the risks posed by gambling and has included the requirement for local risk assessments in this latest version of its Statement of Gambling Policy. Risk mapping is a piece of work under consideration with Northamptonshire County Council Public Health with a view to adding at a future review of the policy as discussed below.</p>

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	<p>appropriately?</p> <ul style="list-style-type: none"> 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 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>	
Rothwell Town Council	Rothwell Town Council discussed the consultation last night and have no comments to make other than that they are fully in support of the Policy Statement.	The support of Rothwell Town Council is appreciated.
Lucy Wightman Director of Public Health Northamptonshire County Council	<p>Dear Sir / Madam,</p> <p>Please consider this letter a response from Northamptonshire County Council's Public Health team to your consultation on your draft Gambling Act 2005 Policy Statement 2019-2021.</p> <p>The Public Health team recognise that gambling is a legal and legitimate form of entertainment, undertaken in some form by a large proportion of the population. It also recognises that for the majority of people, gambling causes limited harm or problems.</p> <p>Gambling Harm:</p> <p>However it is increasingly recognised that gambling can, and is, causing significant harm to individuals, families and wider communities. This harm can impact on an individual's direct health and wellbeing but can also impact on other areas such as financial inclusion/wellbeing, housing and homelessness and affecting their families and leading to family breakdown. Recent media has identified the significant links with problematic</p>	Part B Paragraph 1.23 has been amended to read "There is significant potential impact of gambling on wider health and wellbeing. This is a hugely important context to the local gambling licensing process, which should be taken into consideration as far as the licensing legislation allows, in order to contribute to community wellbeing. It is specifically relevant to this objective." This licensing authority

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	<p>be in that area (for example, where there is a treatment centre or hostel); the other types of businesses in the area (for example, in an area with a vibrant night time economy, or where there are already multiple gambling premises), or because of the characteristics of an area (for example, if there are pre-existing issues with anti-social behaviour or crime). Authorities can draw on some of the existing research highlighted in the first section of this document to identify specific at risk groups, coupled with their local knowledge of relevant issues and premises. This can help identify additional measures or protections that may need to be applied in those areas, for example specific licence conditions or a presumption that it may be harder to get a licence if it is felt that there is a greater risk to the licensing objectives in certain areas.</p> <p>It is also addressed in the Gambling Commission Guidance to Local Authorities: there is no mandatory requirement to have a local area profile, but there are a number of benefits:</p> <ul style="list-style-type: none"> • it enables licensing authorities to better serve their local community, by better reflecting the community and the risks within it • greater clarity for operators as to the relevant factors in licensing authority decision making, will lead to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application • it enables licensing authorities to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge • it encourages a proactive approach to risk that is likely to result in reduced compliance and enforcement action. <p>We recognise that producing an area profile is not a mandatory requirement of Licensing Authorities, but as a best practice approach to recognising and responding to health and wellbeing harm, this would be an important information source to better understand possible risks, to inform licensing practices and decisions and to work with partners across statutory and voluntary sector to support individuals and families.</p> <p>The Public Health team would welcome being a partner to develop this information source, and better understand local need and how we can work together to prevent and respond effectively.</p> <p>Reference: LGA / PHE (2018) 'Tackling Gambling Related Harm – A Whole Council Approach' https://www.local.gov.uk/sites/default/files/documents/Tackling%20gambling%20related%20harm_LGA_10%2023.pdf</p>	

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