

**Summarised Feedback – Statement of Licensing Principles  
Gambling Act 2005 Draft Policy 2019/2022**

Name	Comment & Policy Reference	Officer Comments
<p><b>Jane Blade, Gambling Commission Compliance Manager 10 September 2018 10:28</b></p>	<ol style="list-style-type: none"> <li>1. There is no reference here that I could see to you asking for the local area risk assessment to be kept on the premises. We recommend that you do this, as it is not a legal requirement, but can be asked for in your SOP to ensure it is available for you to see when doing inspections and to ensure that staff have seen it.</li>   <li>2. The list of responsible authorities is incorrect – refer to s.157 of the GA05. Also, you can update HMRC with the email address - <a href="mailto:nrubetting&amp;gaming@hmrc.gsi.gov.uk">nrubetting&amp;gaming@hmrc.gsi.gov.uk</a></li>   <li>3. The sections on uFEC and Prize Gaming Permits seem to be duplicated in two different places?</li> </ol>	<p>1. Officer agree and has inserted the following:</p> <p><i>The Licensing Authority would expect the local risk assessment to be kept on the individual premises and be available for inspection.</i></p> <p>2. Amend accordingly.</p> <p>3. Whilst being similar they do contain different guidance and it's not considered practical at this stage in the process to re-draft, though we could consider at a future update.</p>

	<p>4. We would suggest you remove the section on stakes and prizes for gaming machines and refer people to the GC website for the up to date list, as this can change.</p> <p>I hope that helps, and please note this is not a representation, just points for you to consider!</p>	<p>4. For ease of reference in hard copy format, keep this section, however link has been added to footnote with Gambling Commission website</p>
<p><b>Tracy Kelly</b>  <b>Southborough Town Clerk</b>  <b>28 September 2018 09:11</b></p>	<p>Councillors agreed at their Full Council meeting on 27<sup>th</sup> September 2018 to respond to this consultation as individuals and not as the Council as a whole.</p>	<p>No individual responses received</p>
<p><b>Graham Scothern</b>  <b>Store Manager</b>  <b>Tesco Metro – Tunbridge Wells</b>  <b>Fri 07/09/2018 17:05</b></p>	<p>We do not have any gambling equipment in my shop So not sure why we have been sent the email</p>	<p>Company previously held a Club Machine Permit for staff members.</p>
<p><b>Iain Corby Deputy Chief Executive – Gamble Aware</b>    <b>07 August 2018 13:58</b></p>	<p>Thank you for consulting us on your draft Statement of Principles under the Gambling Act 2005.</p> <p>GambleAware is an independent charity tasked to fund research, education and treatment services to help to reduce gambling-related harms in Great Britain. We work in partnership with the Gambling Commission and its independent advisors, the Responsible Gambling Strategy Board, to deliver many aspects of the National Responsible Gambling Strategy.</p> <p>Due to the resource constraints on a small charity, we are not able to offer specific feedback on your policy. However, we do strongly commend two recent publications by the Local Government Association which set out the range of options available to local authorities to deal with gambling-related harms using existing powers.</p>	<p>This response was received following the officers initial request for information/statistical data for inclusion within the draft document.</p> <p>Officers subsequently sent the consultation document, however no further response has been received.</p>

<https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach>  
<https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales>

We fully support local authorities which conduct an analysis to identify areas with increased levels of risk for any reason, but particularly where there are higher than average resident or visiting populations from groups we know to be vulnerable to gambling related harm – children, the unemployed, the homeless, certain ethnic-minorities, lower socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services – and include additional licence requirements to mitigate this increased level of risk.

We do not hold data at local authority level for treatment services. We are undertaking a needs assessment for treatment services which we expect will report early in 2019, and this will give councils insight into the expected level of need in their areas. The report will be published on our website here when it is available:

<https://about.gambleaware.org/research/research-publications/>