

ORGANISATION	RESPONSE	ACTION OR AMENDMENT TO THE POLICY
<p>GAMCARE</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>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/</p>	<p>The risk based mapping methodology will be assessed during the next three year policy review. As indicated within the draft policy, the Chief Medical Officer for Wales has also called for further research into the impact of gambling on health.</p>
	<p>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.</p>	<p>The location of premises is considered within paragraphs 2.4 and 2.6 of the policy document and follows the statutory guidance on this point.</p> <p>The issues for operators to consider within their risk assessments are considered in paragraph 3.1 of the policy document.</p> <p>This links the risk assessment to the specific premises, the local area and the community. Each case must be determined on its merits and not be pre-determined.</p>

	<p>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.</p>	<p>Local risk assessments are covered in paragraph 3.1 of the policy document and are specific to the premises, the local area and the community .</p> <p>It is a mandatory requirement that risk assessments are carried out and include the proximity of the premises to schools, youth centres, entertainment venues and parks and playgrounds.</p>
	<p>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?</p>	<p>The authority has specified that staff training is a matter for consideration as part of the local risk assessment at paragraph 3.1 of the policy.</p>
	<p>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>The authority has already specified that staff numbers is a matter for consideration within the local risk assessment.</p>
	<p>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>The authority has already specified that layout and provision of CCTV are matters for consideration within the local risk assessment.</p>

	<p>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>Proposed amendment 1</p> <p>Add the following to the risk assessment guidelines at paragraph 3.1</p> <p>The risk assessment should include an assessment of the impact of any promotional material likely to encourage the use of the premises by children who are not allowed to access the premises.</p> <p>Reason: to protect children and vulnerable persons from harm or being exploited by gambling</p>
	<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.</p>	<p>The licensing authority must consider each application on its merits and cannot prescribe membership of any particular organisation.</p>
GAMBLING COMMISSION	<p>Local Risk Assessments</p> <p>Consider making it explicit that the risk assessment should be kept on the premises</p>	<p>Proposed amendment 2</p> <p>Paragraph 3.1 to have an added requirement that a copy of the risk assessment is retained on the premises.</p> <p>Reason: to comply with the licensing objectives by enabling officers to inspect the document during compliance visits and to ensure local staff</p>

		are aware of the document.
	<p>(Alcohol) Licensing premises gaming machine permits and notifications</p> <p>Make more explicit reference to the statutory guidance in relation to this type of permit and notification</p>	<p>Proposed amendment:3</p> <p>At paragraphs 5.2.1 and 5.2.2 add the following header:</p> <p>The licensing authority will adopt the Gambling Commission statutory guidance in relation to notifications and permits in alcohol licensed premises.</p> <p>Reason: to provide applicants and the existing trade with clear guidelines on the authorities approach to licensing.</p>
ELECTED MEMBER	I feel the Council should lobby Welsh Government to limit the number of TV adverts for gambling in view of addiction and debt.	<p>Response:</p> <p>This is not a devolved function, but the impact of gambling on public health is being considered by the Chief Medical Officer for Wales. Advertising forms part of the specific recommendations made by the CMO as follows:</p> <p>“Welsh Government should continue to urge UK Government for stronger action on placing restrictions on gambling advertising (especially online); improving consumer protection, and minimisation of gambling-related harm.”</p> <p>This comment will be fed back to the Chief Medical Officer for Wales.</p> <p>For information, the Gambling</p>

		Commission requires the advertising of gambling products and services to be undertaken in a socially responsible manner and operators must comply with the UK Advertising Codes issued by the Committees of Advertising Practice (CAP) and administered by the Advertising Standards Authority (ASA).
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