

# Appendix A

## Schedule of Responses to review of Gambling Policy 2019 (Statement of Principles)

### Part I

Reference	Respondent	Comments	Appraisal	Response
Appendix 1A	Lincolnshire Fire & Rescue	<p>In respect to the consultation on the above please find my comments for Lincolnshire Fire &amp; Rescue.</p> <ul style="list-style-type: none"> <li>• A Fire Risk Assessment must be conducted when premises hold a licence under enactment – Regulatory Reform (Fire Safety) Order 2005 Article 9 (6) (b)</li> <li>• With regards employment of young person's/children in places that are subject to a licence under enactment. I think again it is worth mentioning that as a fire risk assessment must be undertaken again under Article 9 of the above legislation, the parents/carers of that child/young person must be made aware of the matters and the significant findings from a Fire Risk Assessment.</li> </ul> <p>I feel that the two comments above should be included within the final document and any other licensing polices that you have.</p>	<p>WLDC Licensing Manager discussed the response received from the author of the comments received from Lincolnshire Fire &amp; Rescue service. Bearing in mind that other primary legislation is already in place that deals with matters relating to Fire Safety e.g. <i>Regulatory Reform (Fire Safety) Order 2005</i>, both the current and revised Policy make reference to <i>avoiding duplication with other statutory/regulatory systems where possible</i>. Additionally, there is a specific reference as follows: <i>Fire or health and safety risks will not be taken into account, as these matters are dealt with by other regulations and must not form part of the consideration for the premises licence</i>.</p>	Officer suggests no change to policy.

Appendix 1B	Racecourse Association	<p>Revision of Statement of Gambling Licensing Policy - Consultation</p> <p>I am writing on behalf of the Racecourse Association, the trade association for horse racecourses in Great Britain. We have reviewed the revision of statement of gambling licensing policy for West Lindsey District Council, to which we would like the opportunity to respond on behalf of our members.</p> <p>Door Supervisors (Paragraphs 1.45 – 1.46) – The council is asked to be aware that racecourses already provide door supervisors under the Licensing Act 2003. We would request that the document recognize that there should be no duplication of the regulatory requirements and that racecourses should not have to provide additional door supervisors.</p> <p>Local Risk Assessment (Paragraphs 8 – 8.14) – The Council is asked to be aware that racecourse is not obliged to conduct a risk assessment, that is the responsibility of the operator on the track. We would request that this is specified in the in final document.</p>	Licensing Manager discussed the response from the Racecourse Association and agreed to make minor changes to the policy.	Officer suggests minor change to wording after section 8.12 as a result of feedback from the consultation process in order to reflect the response from the Racecourse Association.
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Appendix 1C	Gamcare	<p>Hello, Thank you for your email, 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 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"> <li>• 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 <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></li> <li>• 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</li> </ul>	Licensing Manager tried to contact the Gamcare representative, however the person concerned was unavailable.	<p>Officer suggests no change to Policy as a result of consultation process.</p> <p>Officers have considered each item suggested within the Gamcare response and consider that their list of issues or factors are reflected within the draft policy. However this policy does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome.</p>
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		<p>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> <ul style="list-style-type: none"> <li>• 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>• 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?</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>We would suggest that the Local Licensing Authority primarily consider applications from GamCare Certified operators. GamCare Certification is a voluntary process comprising an</p>		
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		<p>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 #####@gamcare.org.uk</p> <p>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.</p> <p>If there is anything else we can assist with please do let us know.</p> <p>Kind regards.</p>		
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