



Appendix 2

**Consultation Results Summary Report
Statement of Gambling Policy 2019-2022**

DRAFT

Contents

1. Introduction

2. Consultation Activity undertaken

3. Summary of Survey Results

4. Council's response to key issues raised by respondents

5. Conclusion

DRAFT

1. Introduction

Section 349(3) of the Gambling Act 2005 states that: In preparing a statement or revision under this section a licensing authority shall consult:

(a) either—

(i) in England and Wales, the chief officer of police for the authority's area, or

(ii) in Scotland, the chief constable of the police force maintained for the police area comprising that area,

(b) one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area, and

(c) one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under this Act.

2. Consultation Activity Undertaken

The Gambling Commission do not recommend any minimum consultation period. As the changes were relatively minor it was felt that an eight week consultation period was appropriate.

This consultation commenced on 30th September 2019 and continued for the eight weeks, ending at midnight on 25th November 2019.

The Council's proposals were summarised in a consultation document that was made available in the consultation pages of the Council's website. Responses to the proposals were invited via an online survey/questionnaire (hard copies were also available on request) and through individual written reply by letter or email.

The consultation was publicised in the following ways:

- A press release was issued to launch the consultation on 4th October 2019
- The link to the consultation has been on the Local Authority website throughout the consultation period.
- An email or letter was sent to all of the consultees listed in Appendix E of the Draft Statement of Gambling Policy.
- The consultation was publicised in the September and October editions of the Safer Havering-Safety & Enforcement Newsletter.

- The consultation has been publicised on social media on most days including weekends during the consultation period. The messaging was varied between promoting the consultation as a whole and promoting the key messaging.
- Social media data:
 - On average there were between 840 and 1283 impressions on all posts throughout the consultation [impressions are the number of times a tweet shows up in somebody's timeline]
 - Engagement on posts averaged between 1-9 per post with the highest engagement of 14, 16, & 17 on 3 separate posts [Engagement is total number of times a user interacted with a post. Clicks anywhere on the Tweet/post, including Retweets, replies, follows, likes, links, cards, hashtags, embedded media, username, profile photo]
- Inclusion of relevant cabinet member in communications [Before Purdah]
- All officers within Public Protection have added the consultation link to their email footers during the consultation period.

3. Summary of Survey Results

Full responses to the online survey were received from 5 participants.

Table 1 summarises the responses received to key questions about the consultation scheme:

Table 1

Question	Response Yes	Response No	Comments
In paragraphs 7.4 & 10.35, we have clarified issues that we will consider as part of our risk based approach to inspections. Do you agree these changes are beneficial?	5 (100%)	0	
Section 8 is a new section which sets out the Licensing Authority's principles relating to protecting children and other vulnerable persons from being harmed or exploited by gambling. Do you agree these changes are beneficial?	5 (100%)	0	
10.19 We are encouraging applicants to conduct Local Risk Assessments (LRAs)	5 (100%)	0	

<p>and keep a copy at the premises available for inspection.</p> <p>Do you agree with this proposal?</p>			
<p>10.22 & 10.23 We expect applicants to follow the Gambling Commissions advice regarding self-exclusion.</p> <p>Do you agree with this proposal?</p>	5 (100%)	0	
<p>10.24 We have added examples of conditions that applicants may wish to offer when applying for a licence.</p> <p>Are these suggested conditions helpful?</p>	5 (100%)	0	
<p>10.30 Adult Gambling Centres- We are requiring all licences to include procedures designed to prevent underage gambling.</p> <p>Do you agree with this proposal?</p>	5 (100%)	0	
<p>11.6 Gaming Machine Permits- The authority expects operators to provide information leaflets and helpline numbers to protect vulnerable persons.</p> <p>Do you agree with this proposal?</p>	4 (80%)	1 (20%)	Pamphlets are great, but many addicts are oblivious to their condition. You need practical measures, eg max 1 hour on machines.
<p>Are there any other comments you wish to make in respect of the policy? - Please answer below</p>			A reduction in the number of licensed premises for gambling overall would be more beneficial to the local environment.

The Authority received two other responses in relation to the consultation. These were both received by email to the licensing mailbox.

4. Council's response to key issues raised by respondents

General comments about the proposed Statement of Gambling Policy were received both as part of the online consultation and in the form of emails which were sent directly to the Licensing email account. A total of 4 comments were received which were generally in relation to the potential harm caused by gambling. The responses to the comments are given below in table 2.

Table 2

Body or Organisation	Consultation Representation	Response
Not specified	Pamphlets are great, but many addicts are oblivious to their condition. You need practical measures, eg max 1 hour on machines.	<p>The Gambling Act 2005 does not give the legal power to restrict the duration that users may use gaming machines in alcohol licensed premises.</p> <p>The Licensing Authority would recommend however that the Gaming Machine in Pubs guidance issued by the Gambling Commission is adopted by all operators within the borough. The following paragraph is to be added to the draft policy document at section 11.6:</p> <p><i>'Pubs that choose to make machines available to the public must only do so during the hours that the premises licence allows the sale of alcohol. They should also adhere to the Code of Practice for Gaming Machines in Clubs and Premises with an Alcohol Licence'</i></p>

Not specified	A reduction in the number of licensed premises for gambling overall would be more beneficial to the local environment.	The Gambling Act 2005 does not give the legal power to restrict the number of gambling premises in a Licensing Authorities area.
Not specified	<p>I am extremely pleased that someone is trying to help the sorry number of people effected by this horrendous vice.</p> <p>My son has lost his family and no end of jobs, due to his serious gambling addiction. He has attempted suicide, bankrupt and still will not be left alone by unscrupulous businesses that continue to tempt him back, every time he has tried to stop by offering him free bets. I have financially supported him, making myself go without. He is perused by debt collectors.</p> <p>It is only a question of time before he will succeed in his deep depressive state to end his life.</p> <p>No on understands a man that has such deep addiction and cannot seek help.</p> <p>To date I have kept him off the streets, but my money is coming to an end ... this is just one of many sad stories.</p> <p>It is my only wish that I never have to be at his funeral.</p> <p>All in the name of 'Gambling ' Do your best to help clean the world of this .. shut those gambling shops down, as far as I am concerned. The very least shut them on a Sunday and in the evenings!!!</p>	<p>The Gambling Act 2005 does not give the legal power to restrict the operating hours of premises in a Licensing Authorities area.</p> <p>Operating hours are subject to the appropriate planning permission for each individual premises.</p> <p>This Licensing Authority will however ensure that premises that undermine the gambling objectives are investigated and appropriate action taken.</p> <p>It is our opinion that this policy takes a more proactive stance towards tackling gambling related harm and the protection of children and vulnerable persons from gambling than the previous policy.</p>

<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>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- 	<p>In reviewing the policy post consultation most of these items have been covered and there were only a few revisions made:</p> <p><i>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?</i></p> <p>Vulnerable adults are to be added at section 8.2 as well as children.</p> <p><i>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.</i></p> <p>This is to be added as a bullet at 8.3</p> <p><i>We would suggest that the Local Licensing Authority primarily consider applications from operators who have achieved our Safer Gambling Standard.</i></p> <p>A bullet point at paragraph 8.3 is to be added stating</p>
----------------	--	---

	<p>understanding-of-risk/</p> <ul style="list-style-type: none"> • 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>“The Licensing Authority would encourage operators to participate in voluntary best practice or certification schemes to assist in their promotion of the objective of protecting children and other vulnerable persons from being harmed or exploited by gambling”</p>
--	--	--

	<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 operators who have achieved our Safer Gambling Standard.</p>	
--	--	--

5. Conclusion

It is clear from the online survey that there is overall support for the Statement of Licensing Policy 2019-22. A few responses expressed concern about the potential harm of gambling and expressed a desire to see a reduction in the number of premises or the hours that they operated.

It is our opinion that this policy takes a more proactive stance towards tackling gambling related harm and the protection of children and vulnerable persons from gambling than the previous policy.

The Gambling Act 2005 does not give the legal power to restrict the number of gambling premises in a Licensing Authorities area. However the Licensing Authority will ensure that premises that undermine the gambling objectives are investigated and appropriate action taken.

DRAFT