

Consultee	Consultation Response	Licensing Authority Reply
Nicola Thomas Justice, Peace & Intergrity of The Diocese of Southwark	A report by the Lords Select Committee on the Social and Economic Impact of the Gambling Industry (page 35) from 2019-20 quoted evidence suggesting that more than half of the UK's 6,000 betting shops were in the UK's most deprived areas. Some of the most deprived parishes in the Diocese of Southwark are in the Royal Borough of Greenwich so this problem is acute. The Lords Select Committee didn't offer solutions to this issue, but did say that betting shops must have adequate staffing and supervision during opening hours which accurately reflects that the size, layout and turnover of that premise. We would encourage you to be mindful of this when issuing licences particularly when considering Local Area Risk Assessments.	The Royal Borough of Greenwich inspect gambling premises on a regular basis checking the premises are compliant with the conditions of the licence, that there are adequate levels of trained staff and that Local Area Risk Assessments are in place.
Nicola Thomas Justice, Peace & Intergrity of The Diocese of Southwark	The Diocese has a particular concern for vulnerable children and there are a number of Church of England schools in the Royal Borough of Greenwich. We believe that children are at particular risk when exposed to gambling or encouraged to engage in gambling behaviours and habits and that every effort should be taken to restrict their exposure and access to gambling in all its forms. We therefore welcome the consideration given in this statement to protecting children and other vulnerable people from the harms of gambling and would encourage you to place substantial weight on these considerations when issuing licences.	The Royal Borough of Greenwich ensure that appropriate controls are in place when granting licences in locations near schools or premises for the use of vulnerable people, to ensure the licensing objective of the the protection of children and other vulnerable people are protected from the harms of gambling.
Nicola Thomas Justice, Peace & Intergrity of The Diocese of Southwark	We would also encourage you to monitor carefully the effectiveness of the Multi Operator Self Exclusion schemes to ensure that it is being applied appropriately and is working properly to ensure that those who have self-excluded from one betting shop will be excluded from others in the vicinity.	The Royal Borough of Greenwich in the past hosted Bet Watch Meetings for Betting Shops in the Borough. These meeting were suspended due to data protection concerns and in 2020 there has been the Covid-19 Pandemic. This will be on the agenda for future Bet Watch Meetings. A committment to engage with any local bet watch schemes has been added to the policy.
Nicola Thomas Justice, Peace & Intergrity of The Diocese of Southwark	in part A paragraphs 1.3 and 1.4 look as though they have not been updated since the last policy, and refer for example to something that is 'scheduled to open in 2019'.	The Introduction has been updated to say Crossrail is due to open in 2023 and the Plumstead Leisure Centre opened in 2020.

Betting & Gaming Council	When reviewing draft statements of principles in the past, we have seen statements of principles requiring the operation of Challenge 25. Unless there is clear evidence of a need to deviate from the industry standard [Challenge 21] then conditions requiring an alternative age verification policy should not be imposed.	The wording of the RBG Model Conditions advise - "Prominent signage and notices advertising the Challenge [21/25 delete as appropriate] will be displayed showing the operation of such policy."
Betting & Gaming Council	The BGC is concerned that the imposition of additional licensing conditions could become commonplace if there are no clear requirements in the revised licensing policy statement as to the need for evidence. If additional licence conditions are more commonly applied this would increase variation across licensing authorities and create uncertainty amongst operators as to licensing requirements, over complicating the licensing process both for operators and local authorities	It is implicit in the revised Gambling Policy that additional licence conditions may be required based on evidence provided by relevant representations to promote the licensing objectives. This practice has not proved to be common place, evidenced by the fact that all the premises licences that have been granted have not attracted additional conditions. This has been further clarified.
Betting & Gaming Council	The final sentence of paragraph 5.3 of Part A states "Where Responsible Authorities do not make representations, this will not be taken as indicating approval of a particular application." This paragraph should then be expanded to be clear that whilst the lack of representations may not constitute support/approval, as the Responsible Authority is considered to be an expert in its field, if a representation is not submitted, that responsible authority is comfortable that the application is consistent with the licensing objectives.	In the same manner in which a lack of a supporting representation would not be taken to indicate opposition to an application, lack of an opposing representation will not be taken to indicate support. Rather, each representation that is submitted will be considered on their individual merits in relation to the licensing objectives.
Betting & Gaming Council	Paragraph 10.7 refers to "vulnerable areas in the Borough" although these are not defined. This reference should be removed or the "vulnerable areas" should be listed with evidence to support their designation as "vulnerable.	The policy will be updated to refer to areas where specific risks have been identified in a Local Area Profile.

<p>Betting & Gaming Council</p>	<p>Paragraph 11.7 contains a list of bullet points of matters that the authority may consider to be significant changes in circumstances. This list needs to be amended to remove references to matters that are not relevant to any assessment of risk to the licensing objectives. SR Code Provisions 10.1.1 and 10.2.2 provide for “relevant matters identified in the licensing authority’s statement of licensing policy” to be taken into account. The list of bullet points detailing examples of matters that could be considered needs therefore only to reflect matters that are relevant to the licensing objectives. It is impossible to see how issues such as “youths participating in anti-social behaviour” could in itself pose a risk to the licensing objectives. Similarly, underage drinking, graffiti tagging, the proximity of alcohol licensed premises, pawn brokers, payday lenders and job centres cannot be relevant and “gaming trends that may mirror days for financial payments such as pay days or benefit payments” can only be relevant to an assessment of risk to the licensing objectives if the authority’s view is that anyone in receipt of benefits or indeed paid employment is deemed vulnerable or likely to commit crime as a result of gambling. This cannot be correct and references to any issue that I not relevant to the licensing objectives should be removed.</p>	<p>Whether or not a particular matter is relevant to the licensing objectives will likely be a matter of fact and degree, related to the individual circumstances. Of the items specifically listed, the most obvious licensing objective engaged is that related to the protection of children and vulnerable persons from being harmed or exploited by gambling. For example, it is not inconceivable that a problem gambler is more likely to spend more than they can afford on the day they may receive benefit or salary payments, than on another after more essential living expenses have been obtained. As such, gambling promotions deliberately held on such days could be inferred to be rather irresponsible, cynical and self-serving. Similarly if a gambling premises knows about issues of underage drinking in the local area, it is not inconceivable that children who are successfully obtaining other age-restricted products may not attempt to access other adult-only services.</p>
<p>Betting & Gaming Council</p>	<p>Paragraph 11.10 states that measures identified within any risk assessment may be converted into conditions on the premises licence. This should be deleted. An applicant will identify risks to the licensing objectives in the local area risk assessment and outline in that document, the policies, procedures and mitigation measures to be put in place to mitigate the identified risk. The risk assessment is a dynamic document. As risks change or new risks are identified, the policies, procedures and mitigation measures to address those identified risks may be changed very quickly. If, however, the mitigation measures are the subject of premises licence conditions then an application for variation of the premises licence would be required to change these conditions. That could delay changes and would cause unnecessary expense and administration for operators. Under Gambling Act 2005, the imposition of conditions should only be considered where the policies, procedures or mitigation measures do not adequately address the identified risk.</p>	<p>The clause makes it clear that such a condition would only be imposed where it is deemed necessary for the promotion of the licensing objectives, and only following relevant representation.</p>

Betting & Gaming Council	Paragraphs 1.2.4 and 1.2.5 in Part B should be redrafted as these refer to Guidance that has been updated since the Statement of Gambling Policy was last reviewed. The LCCP requirements now require that gaming machines may be made available for use in licensed betting or bingo premises only where there are also substantive facilities for non-remote betting or bingo , provided in reliance on this licence, available in the premises. (SR Code Provisions 9.1.1 and 9.1.2).	The policy has been amended in accordance with the LCCP requirements.
Betting & Gaming Council	Paragraph 1.9 in Part B and the following paragraphs explain the licensing authority’s approach to the imposition of conditions on premises licences. This section would be assisted by a clear statement that the mandatory and default conditions are designed to be, and usually are, sufficient to ensure operation that is reasonably consistent with the licensing objectives and in the circumstances, it is unlikely that additional conditions will need to be imposed. This section should state that additional conditions will only be imposed where there is a clear evidence of risk to the licensing objectives in the circumstances of a particular case that require that the mandatory and default conditions be supplemented.	The policy has been amended to include a statement advising of the mandatory and default conditions under the Act and additional conditions added based on evidence were there is a risk to the promotion of the licensing objectives.
Gamble Aware	You may find GambleAware’s recently published interactive maps useful, which have been designed for use by local authorities. The maps show the prevalence of problem gambling severity in each local authority and ward area as well as usage of, and reported demand for, treatment and support for gambling harms.	A link to the maps will be included in Appendix 5.
Gamble Aware	GambleAware also strongly commends two 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: https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach and https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales .	Reference to our commitment to have regard to guidance issued by the LGA has been included in the Policy at Part A, 8.1.
Gamble Aware	GambleAware is also fully supportive of local authorities which conduct an analysis to identify areas with increased levels of risk for any reason. In particular we support those who also include additional licence requirements to mitigate the increased level of risk. Areas where there are higher than average resident or visiting populations from groups we know to be vulnerable to gambling harms include children, the unemployed, the homeless, certain ethnic-minorities, lower socioeconomic groups, those attending mental health (including gambling disorders) or substance addiction treatment services.	It is RBG's intention to include a LAP which will identify vulnerable groups within the borough.

Gamble Aware	Finally, GambleAware is a leading commissioner of prevention and treatment services for gambling harms. It provides these functions across England, Scotland and Wales and its work is underpinned by high quality research, data and evaluation. We encourage all local authorities to signpost people to the National Gambling Helpline on 0808 8020 133 and also www.begambleaware.org . Both are part of the National Gambling Treatment Service and offer free, confidential advice and support for those who may need it.	RBG will include details of the National Gambling Helpline in the policy .
Metropolitan Police	The Police were satisfied with the policy from a policing perspective and had no comments.	