

**Christa Ferguson**

**From:** Kelly M. Say on behalf of Licensing e-mail address  
**Sent:** 13 May 2019 14:42  
**To:** Christa Ferguson  
**Subject:** FW: GA2005 Consultation  
**Attachments:** GamCare Local Authorities Brochure 2018 (square-web).pdf; GamCare Industry Services Brochure 2018 (web).pdf

Hi Christa

Email as below.

Kind regards

**Kelly Say**

Licensing Assistant  
 New Forest District Council  
 Tel: **02380 285505**

[licensing@nfdc.gov.uk](mailto:licensing@nfdc.gov.uk)  
[newforest.gov.uk](http://newforest.gov.uk)  
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**New Forest In Touch**

**From:** [REDACTED]  
**Sent:** 13 May 2019 14:03  
**To:** Licensing e-mail address  
**Subject:** GA2005 Consultation

Hello,

Thank you for your letter, 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](#).

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.

- 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/](http://www.geofutures.com/research-2/gambling-related-harm-how-local-space-shapes-our-understanding-of-risk/)
- 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 appropriately?
- 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.

We would suggest that the Local Licensing Authority primarily consider applications from GamCare Certified operators. GamCare Certification (now being replaced by our Safer Gambling Standard) 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 Code of Practice. If you would like more information on how our audit can support Local Licensing Authorities, please contact

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.

If there is anything else we can assist with please do let us know.

Kind regards,

**Head of Marketing and Communications**

T: 020 7801 7028

E:



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02

**Christa Ferguson**

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**Subject:** FW: GA2005 consultation

**From:** [REDACTED]  
**Sent:** 13 May 2019 14:52  
**To:** Licensing e-mail address  
**Subject:** GA2005 consultation

Dear Christa,

Thank you for consulting us on your draft Statement of Principles under the Gambling Act 2005.

GambleAware is an independent charity tasked to fund research, prevention and treatment services to help to reduce gambling harms in Great Britain. We work in partnership with the Gambling Commission and its independent advisors, the Advisory Board for Safer Gambling, to deliver many aspects of the National Responsible Gambling Strategy.

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.

<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.

Best regards,

[REDACTED]

Operations Manager & Company Secretary

**GambleAware<sup>®</sup>**

Pennine Place • 2a Charing Cross Rd • London • WC2H 0HF

[REDACTED]

**For information and advice:** [BeGambleAware.org](http://BeGambleAware.org)

**For confidential support and treatment:** National Gambling Helpline 0808 8020 133

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03

**Christa Ferguson**

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**Subject:** FW: GA2005 CONSULTATION

**Importance:** High

**From:** [leisrd@aol.com](mailto:leisrd@aol.com) [<mailto:leisrd@aol.com>]

**Sent:** 14 May 2019 09:40


**To:** Licensing e-mail address

**Subject:** GA2005 CONSULTATION

Hello

With regards to this i would like to put forward that all council licensing offices make the public registers available to view so that as an operator we can check that a site has the correct permit in place, only around 50% of this information is available to us at the moment as some councils do not have the facility.

Regards

  
Red Rose Leisure  
Preston

04

**Christa Ferguson**

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**Subject:** FW: GA2005 Consultation  
**Attachments:** [Untitled].pdf

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**From:** [REDACTED]  
**Sent:** 20 May 2019 11:27  
**To:** Licensing e-mail address  
**Subject:** GA2005 Consultation

Hi

Re the attached consultation.

FYI we have no shops in your LA so have no comment to make.

In the unlikely event that you have any future licensing queries please direct to me.

[REDACTED]

[REDACTED]

**Licensing & Planning**

[REDACTED]



**Paddy Power Betfair** | Waterfront | Hammersmith Embankment | Chancellors Road | London | W6 9HP.  
**Paddy Power Betfair** | Power Tower | Belfield Office Park | Beech Hill Road | Clonskeagh | Dublin 4.

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**GOSCHALKS**  
SOLICITORS

05

BY EMAIL ONLY  
Licensing Department  
New Forest District Council

Please ask for: [REDACTED]  
Direct Tel: [REDACTED]  
Email: [REDACTED]  
Our ref: RJT / MJM / 097505.00005  
#GS2586432  
Your ref:  
Date: 20<sup>th</sup> May 2019

Dear Sir/Madam,

**Re: Gambling Act 2005 Policy Statement Consultation**

We act for the Association of British Bookmakers (ABB) and have received instructions to respond on behalf of our client to the current consultation on the Council's review of its gambling policy statement.

The Association of British Bookmakers (ABB) represents over 80% of the high street betting market. Its members include large national operators such as William Hill, GVC (Ladbrokes Coral), and Paddy Power Betfair, as well as almost 100 smaller independent bookmakers.

Please see below for the ABB's response to the Council's current consultation on the draft gambling policy statement.

This response starts by setting out the ABB's approach in areas relevant to the local authority's regulation of betting shop premises, and its commitment to working with local authorities in partnership. The response finishes by highlighting matters within the policy statement which the ABB feels may need to be addressed.

Betting shops have been part of the British high street for over 50 years and ensuring a dialogue with the communities they serve is vital. For the vast majority, betting is an enjoyable leisure activity which generates income, employment and tax revenue for the economy.

The ABB recognises the importance of the gambling policy statement in focusing on the local environment and welcomes the informed approach this will enable operators to take with regard to the requirements for local area risk assessments. It is important, however, that the gambling policy statement maintains the "aim to permit" structure and does not import additional requirements from other licensing regimes such as Licensing Act 2003 for example by requiring operators to suggest premises licence conditions or to impose requirements beyond those required by statute or the LCCP simply because it may be felt to be desirable or to address a perceived need.

Any consideration of gambling licensing at the local level should also be considered within the wider context.

- the overall number of betting shops is in decline. The latest Gambling Commission industry statistics show that the number of betting offices (as of September 2018) was 8406. This is reducing every year and has fallen from a figure of 9137 in March 2014. This decline is expected to continue. Ladbrokes Coral and William Hill have forecast significant shop closures in the months ahead following several smaller operators who have already closed shops or gone out of business entirely
- the overall number of betting office operators is similarly declining. In September 2018 there were 210 operators licensed for the activity of non-remote general betting. This constitutes a reduction of more than 10% since March 2017
- planning law changes introduced in April 2015 have increased the ability of licensing authorities to review applications for new premises, as all new betting shops must now apply for planning permission.
- A maximum stake of £2 has now been applied to the operation of fixed odds betting terminals
- successive prevalence surveys and health surveys tells us that problem gambling rates in the UK are stable (0.6%) and possibly falling.

### **Working in partnership with local authorities**

The ABB is fully committed to ensuring constructive working relationships exist between betting operators and licensing authorities, and that where problems may arise that they can be dealt with in partnership. The exchange of clear information between councils and betting operators is a key part of this and the opportunity to respond to this consultation is welcomed.

### **Primary Authority Partnerships in place between the ABB and local authorities**

All major operators, and the ABB on behalf of independent members, have also established Primary Authority Partnerships with local authorities. These partnerships help provide a consistent approach to regulation by local authorities, within the areas covered by the partnership; such as age-verification or health and safety. We believe this level of consistency is beneficial both for local authorities and for operators.

### **Local area risk assessments**

Since April 2016, when new LCCP provisions came into force, operators have been required to complete local area risk assessments identifying any risks posed to the licensing objectives and how these would be mitigated. Licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy, and any local area profile, in their risk assessment. These must be reviewed where there are significant local changes or changes to the premises, or when applying for a variation to or for a new premises licence.

The ABB fully supports the implementation of risk assessments which will take into account risks presented in the local area, such as exposure to vulnerable groups and crime. The requirements build on measures the industry had already introduced through the ABB Responsible Gambling Code to better identify problem gamblers and to encourage all customers to gamble responsibly. This includes training for shop staff on how to intervene and direct problem gamblers to support services, as well as new rules on advertising including banning gaming machine advertising in shop windows, and the introduction of Player Awareness Systems which use technology to track account based gaming machine customers' player history data to allow earlier intervention with any customers whose data displays known 'markers of harm'.

### **Best practice**

The ABB is committed to working pro-actively with local authorities to help drive the development of best practice with regard to local area risk assessments, both through responses to consultations such as this and directly with local authorities. Both the ABB and its members are open and willing to engage with any local authority with questions or concerns relating to the risk assessment process, and would encourage them to make contact.

The ABB would be concerned should any local authority seek to prescribe the form of an operator's risk assessment. This would not be in line with better regulation principles. Operators must remain free to shape their risk assessment in whichever way best meets their operational processes.

The ABB has also shared recommendations of best practice with its smaller independent members, who although they deal with fewer different local authorities, have less resource to devote to developing their approach to the new assessments. In this way we hope to encourage a consistent application of the new rules by operators which will benefit both them and local authorities.

### **Concerns around increases in the regulatory burden on operators**

The ABB is concerned to ensure that any changes in the licensing regime at a local level are implemented in a proportionate manner. This would include if any local authority were to set out overly onerous requirements on operators to review their local risk assessments with unnecessary frequency, as this could be damaging. As set out in the LCCP a review should only be required in response to significant local or premises change. In the ABB's view this should be where evidence can be provided to demonstrate that the change could impact the premises' ability to operate consistently with the three licensing objectives.

Any increase in the regulatory burden would severely impact ABB members at a time when overall shop numbers are in decline, and operators are continuing to absorb the impacts of significant recent regulatory change. This includes the increase to 25% of Machine Games Duty, limits to stakes on gaming machines, and planning use class changes which require all new betting shops in England to apply for planning permission.

### **Employing additional licence conditions**

It should continue to be the case that additional conditions are only imposed in exceptional circumstances where there are clear reasons for doing so. There are already mandatory and default conditions attached to any premises licence which will ensure operation that is consistent with the licensing objectives. In the vast majority of cases, these will not need to be supplemented by additional conditions.

The LCCP require that premises operate an age verification policy. The industry operates a policy called "Think 21". This policy is successful in preventing under-age gambling. Independent test purchasing carried out by operators and the ABB, and submitted to the Gambling Commission, shows that ID challenge rates are consistently around 85%. The ABB has seen statements of principles requiring the operation of Challenge 25. Unless there is clear evidence of a need to deviate from the industry standard then conditions requiring an alternative age verification policy should not be imposed.



The ABB 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

### **Considerations specific to the Draft Gambling Act 2005 Statement of Gambling Principles 2019-2021**

On behalf of the ABB, we welcome the light touch approach to the Statement of Gambling Policy and in particular the repeated references to the “aim to permit” principle and the recognition within Section 5.7 that individual conditions are unlikely given that the mandatory and default conditions are usually sufficient to ensure operation that is consistent with the licensing objectives. This section would be assisted by a further reference to the fact that individual conditions will only be imposed where there is clear evidence of a risk to the licensing objectives that requires that the mandatory and default conditions be supplemented in the circumstances in a particular case.

The heading to section 4 of the draft statement of principles is “Promoting the Licensing Objectives.” The reference to “promoting” should be removed as neither the Licensing Authority nor an applicant is required to promote the licensing objectives within the context of a Gambling Act 2005 premises licence. The only body upon whom the Gambling Act 2005 confers a duty to promote the licensing objectives is the Gambling Commission.

Paragraph 5.5 explains the Licensing Authority’s approach to local risk assessments and correctly identifies that operators are required to have policies, procedures and control measures to mitigate any local risks to the licensing objectives.

Thereafter, there is a list of bullet points that need to be re-drafted. The reason that this needs to be re-drafted is that the list of bullet points contains matters that are not relevant to any assessment of risk to the licensing objectives. For example, whether the premises is in an area of deprivation, the ethnic profile of residents in the area and the range of other facilities in the area cannot be relevant to any assessment of risk to the licensing objectives. The only way ethnicity/deprivation could be relevant is if the Licensing Authority had pre-determined that persons in a particular socio economic group or of a particular ethnicity were either automatically vulnerable or more likely to commit crime as a result of gambling. This cannot be the case.

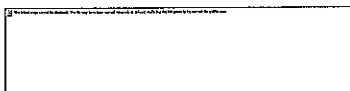
Furthermore, the range of other facilities in the area, the proximity of churches etc and known problems of street drinking and anti-social behaviour are not relevant to any assessment of risk to the licensing objectives. Moral objections cannot be entertained and issues of nuisance correctly identified earlier in the draft Statement of Principles as considerations that are not relevant.

The second list of bullet points deals with how the local risk assessment should show how vulnerable people are protected. Once again, this list contains matters that are not relevant to an assessment of risk to the vulnerable and should be re-drafted. For example, “gaming trends that may mirror days for financial payments such as pay days or benefit payments” cannot be relevant unless the Licensing Authority has predetermined that those in receipt of benefits are automatically vulnerable. The list of bullet points should be redrafted so that it refers only to relevant considerations.

## Conclusion

The ABB and its members are committed to working closely with both the Gambling Commission and local authorities to continually drive up standards in regulatory compliance in support of the three licensing objectives: to keep crime out of gambling, ensure that gambling is conducted in a fair and open way, and to protect the vulnerable. Indeed, the ABB and its members already do this successfully in partnership with local authorities through the adoption of the ABB Responsible Gambling Code, which is mandatory for all members, and the Safe Bet Alliance (SBA), which sets voluntary standards across the industry to make shops safer for customers and staff. We would encourage local authorities to engage with us as we continue to develop both these codes of practice, which are in direct support of the licensing objectives, as well as our processes around local area risk assessments.

Yours faithfully,



GOSSCHALKS

**Christa Ferguson**

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**Subject:** FW: Gambling Act Policy Consultation - GA2005 CONSULTATION

**From:** [REDACTED]  
**Sent:** 04 June 2019 13:38  
**To:** Licensing e-mail address  
**Subject:** RE: Gambling Act Policy Consultation - GA2005 CONSULTATION

Dear Licencing Team

The Parish Council discussed this at their meeting last night but decided it had no specific comment to make on it.

Yours faithfully

[REDACTED]  
**Assistant Parish Clerk**  
**Milford-on-Sea Parish Council**

[REDACTED]  
[www.milfordonsea.org.uk](http://www.milfordonsea.org.uk)

The Old Clock House  
22 High Street  
Milford-on-Sea  
SO41 0QD

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**From:** [licensing@nfdc.gov.uk](mailto:licensing@nfdc.gov.uk) <[licensing@nfdc.gov.uk](mailto:licensing@nfdc.gov.uk)>  
**Sent:** 13 May 2019 10:41  
**To:** [milfordpc@btconnect.com](mailto:milfordpc@btconnect.com); [REDACTED]  
**Subject:** Gambling Act Policy Consultation

## **Gambling Act 2005**

### **Statement of Licensing Principles**

The Council's statement outlines the Authority's policy in respect of the grant of licences, permits and registrations issued under the above Act. It indicates how the Licensing Authority will promote

the gambling licensing objectives and the Authority's expectations of licence holders in promoting the three licensing objectives which are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Ensuring that gambling is conducted in a fair and open way, and;
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Under the Act, the Licensing Authority is required to review the Council's Statement of Licensing Principles (Licensing Policy) on a three yearly basis, and to consult upon any changes proposed.

We have taken the opportunity to revise the format and content of the policy to reflect the latest guidance issued to licensing authorities by the Gambling Commission.

Before the revised statement can be adopted, the Licensing Authority must consult with a wide variety of individuals, businesses and public bodies that may have an interest in licensed premises within the district.

Views on the revised policy are appreciated as part of the consultation; however the Act precludes the Licensing Authority from considering comments of the following nature:

- Comments based on a dislike of gambling, or a general view that it is undesirable to allow gambling premises in the district (Moral objections) and
- Comments around the demand or need for gambling premises in the district.

The consultation will run from **7 May to 26 July 2019** and the draft policy is available on the Council's website at <http://www.newforest.gov.uk/article/6547/Gambling-Act-2005>

All comments received will be assessed by the Licensing Authority's General Purpose and Licensing Committee before a revised policy is published by the Council.

If you wish to comment on the Draft Policy please email your response to

[licensing@nfdc.gov.uk](mailto:licensing@nfdc.gov.uk) by **5pm on Friday 26 July 2019**.

Please title your email **GA2005 CONSULTATION**

**Christa Ferguson**

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**Subject:** FW: GA2005 CONSULTATION

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**From:** Sean Spencer [<mailto:sean.spencer@hytheanddibden.gov.uk>]

**Sent:** 13 June 2019 15:00

**To:** Licensing e-mail address

**Cc:** Claire Donnelly

**Subject:** GA2005 CONSULTATION

Good afternoon,

Thank you for providing the Council with the opportunity to comment on the above.

Following consideration by this Council's Planning Committee on 12 June 2019, I can confirm that Hythe and Dibden Parish Council supports New Forest District Council's Statement of Licensing Principles.

Regards

Sean Spencer

Deputy Clerk

Hythe and Dibden Parish Council

The Grove, 25 St John's Street

Hythe

Southampton

Hampshire

SO45 6BZ

Tel 02380 841411

[www.hytheanddibden.gov.uk](http://www.hytheanddibden.gov.uk)

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### Public Health response to draft Gambling Act 2005 Statement of Principles

Consultation:	Draft Gambling Act 2005 Statement of Principles for New Forest District Council
Link to document:	<a href="https://democracy.newforest.gov.uk/documents/s11533/Appendix%201.pdf">https://democracy.newforest.gov.uk/documents/s11533/Appendix%201.pdf</a>
Comments by:	Hampshire County Council Public Health
Date of Comments:	
Correspondence to:	

Thank you for the opportunity to respond to the draft Statement of Principles (Gambling Act 2005). We have provided a response below.

1. One of the three Licensing Objectives relates to "Protecting children and other vulnerable persons from being harmed or exploited by gambling". The term of 'vulnerable persons' has not been defined in Statute or by the Gambling Commission. The Gambling Commission has stated that whilst they did not want to explicitly define who vulnerable people are, this is likely to include people who gamble more than they want to (GC, 2012).
2. The "Gambling Review Report", known as the Budd report, suggested a range of groups considered vulnerable to harm. Such groups included young people, those under the influence of drugs/alcohol, those with co-existing mental health conditions, low income groups and those most disadvantaged and marginalised by economic change (DCMS, 2001). This is illustrated in Figure 1, below.

Figure 1. Factors related to vulnerability to gambling harm

Demographics	Socio-economic	Poor judgement/impairment	Other
Young	Unemployed	Low educational attainment	Problem gamblers
Older people	Low income	Alcohol	Problem gamblers
Women	Problem gamblers	Problem gamblers	Problem gamblers
Problem gamblers	Financial difficulties/debt	Learning disabilities	
	Homeless	Problem gamblers	
	Immigrants		
	Prisoners/probation		

3. Research conducted in the UK suggests that there is a tendency for residence in the most deprived geographical areas to be associated with problem/pathological gambling<sup>2</sup>. The report further identified problem/pathological gambling was associated with being male, younger, having common mental health disorder, smoking and suicide attempts.
4. We note in section 5.6 that there is no Local Area Profile included. We strongly advise you to include the most recent Health Profile for New Forest District, which can be found at [https://fingertipsws.phe.org.uk/static-reports?profile\\_key=health-](https://fingertipsws.phe.org.uk/static-reports?profile_key=health-)

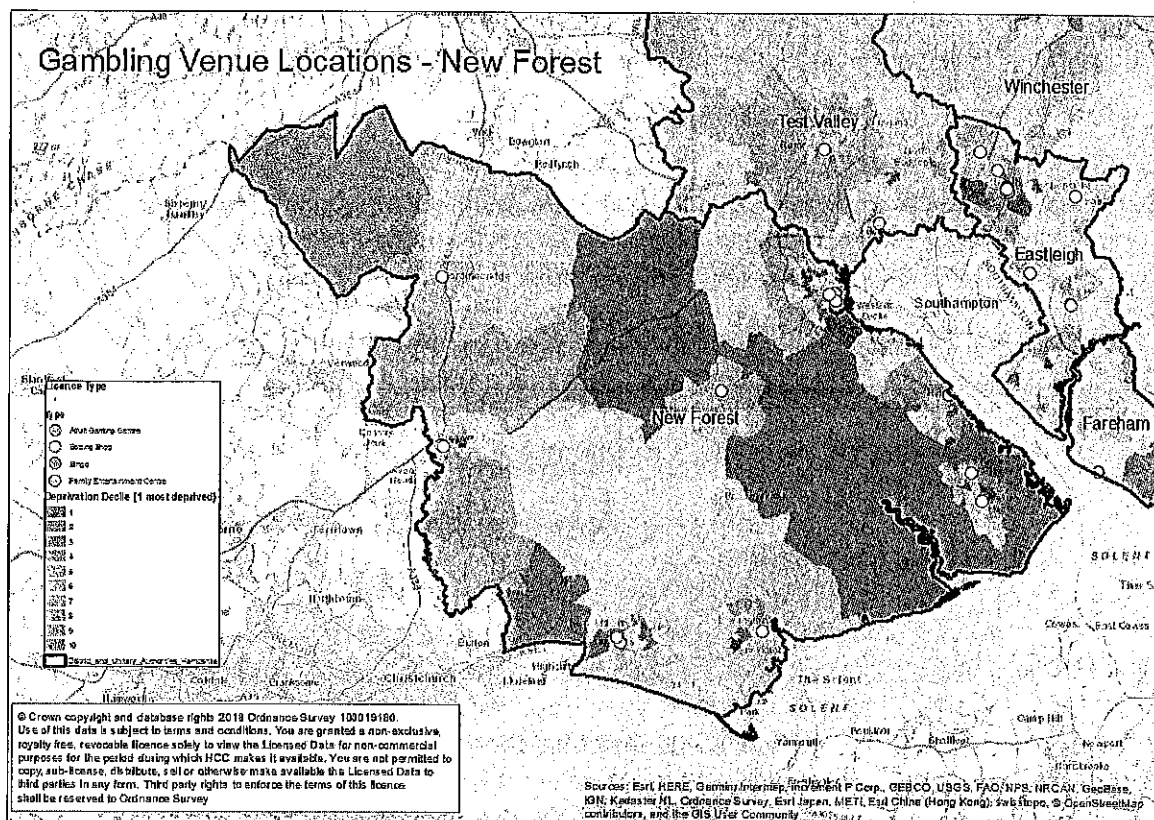
[profiles&file\\_name=e07000091.pdf&time\\_period=2018](#). The Hampshire County Council Public Health team can help with the provision of additional data to inform a local health profile.

5. We also recommend comparing the number of licensed gambling premises in New Forest District to other districts in Hampshire. According to data from Ordnance Survey (accessed in 2018) New Forest District has 0.19 licensed gambling premises per 1,000 population. When ranked by district in Hampshire, New Forest ranks 7<sup>th</sup> out of 11 for highest density of licensed gambling premises (11 being the most densely concentrated, or highest number of premises per 1,000 population).

6. We further recommend including reference to the relationship between licensed gambling premises and areas of deprivation in New Forest District. This is important since socio-economic factors, especially deprivation, are strongly linked to vulnerability to gambling harm.

7. Figure 2 below shows the location of licensed gambling premises and the levels of deprivation in those locations. It is evidence that the majority of gambling premises in the district are located in areas of greater deprivation.

Figure 2. Licensed gambling premises in the New Forest by deprivation decile (LSOA level)



7. The demographic data and PHE published Health Profile for New Forest District and data published on the Public Health Outcomes Framework dashboard) show that the factors

described above, associated with problem gambling, are more common in the New Forest. This highlights that New Forest District may have residents that are particularly vulnerable to problem gambling. For example, the Heath Profile (2018) shows that the rate of hospital stays for self-harm in New Forest District is significantly worse than the England average. Such data is highly relevant to later sections of the document, such as the overview of the Licensing Objectives in Section 4 (especially 4iii), and will help to contextualise the policy.

8. We welcome section 5.5 of the draft document, outlining the requirement of the Licensing Authority to expect local risk assessments to consider the following:
  - a) The proximity of the premises to schools.
  - b) The commercial environment.
  - c) Factors affecting the footfall.
  - d) Whether the premises is in an area of deprivation.
  - e) Whether the premises is in an area subject to high levels of crime and/or disorder.
  - f) The ethnic profile of residents in the area.
  - g) The demographics of the area in relation to vulnerable groups.
  - h) The location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather.
  - i) The range of facilities in the local area such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities.
  - j) Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activity, etc.
  - k) The proximity of churches, mosques, temples or any other place of worship.
9. We also welcome and support the requirement within section 5.5. of the draft document, outlining how the risk assessment to show how vulnerable people, including people with gambling dependencies, are protected through:
  - a) The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
  - b) Information held by the licensee regarding self-exclusions and incidences of underage gambling.
  - c) Arrangements in place for local exchange of anonymised information regarding self-exclusion and gaming trends.
  - d) Gaming trends that may mirror days for financial payments such as pay days or benefit payments.
  - e) Information on and signposting to relevant support services, included services for drug and alcohol misuse.
  - f) Arrangements for monitoring and dealing with under age people and vulnerable people, which may include:
    - i. Dedicated and trained personnel,
    - ii. Leaflets and posters,
    - iii. Self-exclusion schemes,
    - iv. Window displays and advertisements designed to not entice children and vulnerable people. The provision of signage and documents relating to



game rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality.

- v. An assessment of the proximity of premises that may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctors' surgeries, council community hubs, substance misuse (drug & alcohol) services and places where alcohol or drug dependent people may congregate.

10. We further support the requirement for the local risk assessment to show how children are to be protected through an assessment of:

- a) The proximity of institutions, places or areas where children and young people frequent such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas, etc.
- b) The proximity of places where children congregate such as bus stops, cafes and shops.
- c) Areas that are prone to issues of youths participating in anti-social behaviour, including activities such as graffiti, tagging, underage drinking etc.

11. The Hampshire Public Health Team is able to support the risk assessment process by signposting to relevant sources of data and supporting with data interpretation. We would encourage the licensing authority to make contact, via [public.health@hants.gov.uk](mailto:public.health@hants.gov.uk).

