

Appendix 4: Thematic responses to Wiltshire Council Statement of Gambling Principles Consultation May 2015 – August 2015

The comments requiring action are set out in the table below.

Additional wording following consultation highlighted in red in the Statement of Gambling Principles Draft Document.

Paragraphs referred to, highlighted in yellow in the Statement of Gambling Principles Draft Document.

Theme of Comment	Responder	Feedback / Comments	Action
Moral Objections	Coral Racing Limited	The Board when considering applications are required to 'aim to permit gambling' where this is 'reasonably consistent with the licensing objectives' (you list the 3 licensing objectives within the document at item 2.1(page 7). We additionally highlight that neither demand (which you include) nor moral objections, should be taken into account when judging applications.	The phrase moral objection is referred to in 8.0 Decision Making, therefore has been included in 2.1 also to mirror.
Proximity	Coral Racing Limited	Specifically and in relation to the note that the Licensing Authority will take into account the proximity of the application in relation to schools, vulnerable adult centres, residential areas with a high concentration of families and children, residential children's homes & hostels providing accommodation for young people leaving care and places which have a similar characteristics (those listed within item 4.0- Page 14): <ul style="list-style-type: none"> Coral knows of no evidence that the location of a licensed betting office within the proximity of the aforementioned causes harm to the licensing objectives. It involves a four-fold suggestion that a) those using such facilities are inherently problem gamblers, b) that having visited such facilities, users are more likely to visit a betting office than if they had not used such facilities, c) that if they do, that they are more likely to engage in problem gambling, and d) that the protective mechanisms arising 	The list mentioned in the response is a starting point for consideration in regards to suitability of any gambling premises and does not solely refer to betting premises as suggested by Coral Racing Ltd. To aid clarity the following sentence is proposed as an addition in 4.0. The Local Authority will be mindful of the type of gambling application submitted and consider each on a case by case basis.

		<p>from the Licence Conditions and Codes of Practice are insufficient to mitigate the risk. There is no evidence for any of these propositions.</p> <ul style="list-style-type: none"> • Coral knows of no evidence that children coming from schools are gaining access to betting offices. Coral's general experience, in common with every bookmaker, is that children are not interested in betting, and in any case the Think 21 policy operated by Coral is adequate to ensure that under-age gambling does not occur in their premises. There are very many examples of betting offices sited immediately next to schools and colleges and no evidence whatsoever that they cause problems. <p>The reason for Coral's caution against making such perceptions, which we anticipate is similar to that of the other main bookmakers, is that it already operates systems which ensure that the licensing objectives are strongly promoted across its estate.</p>	
Local Risk Assessment	Coral Racing Limited	Through the additional local risk assessment to be introduced with future premises licence applications from April 2016, Coral believe that these should be a) to assess specific <u>risks</u> to the licensing objectives in the local area, and b) to assess whether <u>control measures</u> going beyond standard control measures are needed.	<p>In light of the changes to the Gambling Act 2005, highlighted in the guidance on Social Responsibility from the Gambling Commission (due to come into effect in April 2016), it is agreed that the following bullet point be added to the list when considering new premises applications.</p> <p>Local risk assessment for premises (due to come into effect in April 2016).</p>
	Power Leisure Bookmakers Limited	<p>Although the current draft policy does not address the requirement for local area profiling, we respectfully refer the Authority to the Regulators' Code, which provides that in making an assessment of risk, Regulators should recognise the compliance record of those they regulate and take an evidenced based approach to determining the priority risks in their area of responsibility.</p> <p>The draft policy confirms that the Authority will pay</p>	

		<p>particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling and the location of proposed premises in particularly sensitive locations (paras 2.1, 3.3 and 4.0), as well as areas with known high levels of crime and disorder (para. 3.1). In order to fully address any potential concerns, all risk profiles should be based upon empirical evidence of gambling related harm in consideration of those measures already in place to mitigate actual rather than theoretical risk.</p> <p>When considering crime and disorder, the policy should identify that there is a clear distinction between disorder and nuisance and highlight that nuisance was specifically rejected by Parliament as a licensing objective under the Gambling Act 2005. As part of any analysis of crime and disorder, the Authority may wish to consider the prevalence of illegal gambling and ensure that any measures proposed to address crime is proportionate to the existing operational procedures implemented by operators to address crime and disorder associated with any gambling provision.</p> <p>Whilst local area risk profiling has not been addressed in the current draft policy, the authority must consider that should any specific policies be contemplated in the future regarding the location of specific gambling premises, thorough details should be provided for consultation with stakeholders.</p>	<p>The Local Area Risk Assessment for Wiltshire will be written to encompass the diversity of the Wiltshire Council area. This will be proposed as an Appendix to this Statement of Gambling Principles in due course.</p>
--	--	--	--