

Consultation Reference	Consultation comment	Workshop Member recommendation/comments
A	Did it really need to be 32 pages? Could you not have produced something that was more succinct and easy to read?	No comment
B	Gambling premises adds very little to society, but they take a great deal. They plague our most deprived areas, further exaggerating social disparities between rich and poor. I would urge BCP to use this policy to place limits on the number of gambling shops, notably using the deprivation factor as a limiting key on where they can be based.	Section 153(1) of the Gambling Act places a requirement on licensing authorities to <i>“aim to permit the use of premises for gambling”</i>
C	Change somehow that young people especially think they can beat the machines? I have personal experience how people can put all of their income into a fruit machine?	<p>This policy and the legislation are unable to address the points made here.</p> <p>Overall, the policy objectives aim to protect children and vulnerable adults.</p> <p>Members cannot express personal opinions but acknowledge these issues do exist.</p>

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	<p>Gambling should be considered as bad as drunk driving it ruins lives !</p> <p>Education in schools explaining how much profit the gaming machines make? You can not make a living playing fruit machines!</p>	
D	<p>Gambling addiction is a big problem in this country affecting everyone from all classes regardless of race, gender, class and status, causing massive social problems, don't encourage young people to gamble or allow new places to open.</p>	<p>The policy and the licensing objectives are to protect children to ensure they do not access inappropriate gambling premises and also to protect vulnerable adults from gambling harm.</p> <p>Some education is covered in schools in personal development classes which includes highlighting the risks of harm from addictions such as drugs alcohol and gambling</p> <p>The Equalities Impact Assessment has addressed the impacts on protected characteristics such as age.</p> <p>The application process will address these concerns for any new proposed premises.</p>
E	<p>We rank the third highest in the country for people struggling to afford food. Gambling should not even be a priority until we aren't famous for poverty. We should be leading an example to other seaside</p>	<p>The statistics stated cannot be verified.</p> <p>The policy objectives are to address problem gambling and protect children and vulnerable adults.</p> <p>The Licensing Authority has no powers within the legislation to close down existing premises or change their use.</p>

	<p>resorts and famous for blue flag beaches but we are not. We are known for raw sewage being pumped straight into the sea and being the third highest area for poverty. Gambling addictions only contribute to the overstretched mental health services and NHS. Close all existing betting shops and minimise the amount of arcades. Turn them into health centres where people can access vital services such as transgender services.</p>	
G	<p>Add some definition throughout the document as to what will happen and what the "gambling scene" will look like in the borough It's just "ticking the boxes" and lacks any real tangible facts about what is going to happen and how many gambling establishments are to be allowed. there are already too many in my view</p>	<p>When applications are submitted each one is assessed on its own merits.</p> <p>The applications will be granted or refused based on the criteria expressed within the document and the statutory guidance provided and what is contained in the local risk assessment which will be part of the application. Unlike the planning regime there is no overarching local plan in respect of gambling, and we have no power to restrict numbers.</p> <p>Numbers of licenced premises are gradually declining as more gambling is moved on line.</p>

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G	<p>Every effort should be made to educate citizens and young people about the risks incurred by gambling in all forms except when used by registered charities.</p> <p>The survey assumes that some form of gambling can be a recognised business and is quite acceptable. It is not, and the barrage of advertising by gambling companies is extremely dangerous.</p> <p>The only way to reduce or remove the potential adverse effects is to ban all advertising for gambling schemes.</p>	<p>Education is covered in schools in personal development classes which includes highlighting the risks of harm from addictions such as drugs alcohol and gambling.</p> <p>Gambling is recognised under legislation, and it is not in the power of the Licensing Authority to ban or put limits on the number of establishments. The policy sets out how premises should be operated and regulated and what the Licensing Authority would expect to be considered by any applicant as they draft their Local Risk Assessment</p> <p>All advertisements are regulated by the Advertising Standards Authority, and it is not within the remit of BCP Council to stop or ban such advertising. The Licensing Authority are aware of recent commitments from Government and the Industry, aimed at supporting those more vulnerable to effects of Gambling/Advertising</p>
H	<p>The Dorset Police and Crime Commissioner supports the proposed BCP Council's Statement of Principles 2022 to 2025 on the Gambling Act 2005 – subject to the request that BCP Council's Licensing Department effectively monitors, where within its powers, the licenced</p>	<p>All applications will be accompanied by a risk assessment which will be peer reviewed by officers at the time of submission. Licensing officers assessing applications will ensure appropriate engagement with local partners and organisations to ensure the assessment is fit for purpose</p> <p>The Licensing Manager used the document referred to within the EINA assessment process and the policy objectives are to reduce harm associated with gambling whilst recognising that this is a legally accepted activity.</p>

	<p>gambling premises in line with the risks caused by gambling harm. This is particularly in light of the Government's recently published national report - In 2019, the Department of Health and Social Care commissioned PHE to undertake a review of the evidence on gambling harms which was published on 18 October 2021. It highlighted that the harms associated with gambling cost at least £1.27 billion in 2019 to 2020 in England alone.</p>	
I	<p>Paragraph 14 is headed "Promotion of Licensing Objectives". This title should be re-drafted to avoid any confusion with Licensing Act 2003 duties/obligations. Under Gambling Act 2005, applications must be reasonably consistent with the licensing objectives and there is no duty upon anybody to promote the</p>	<p>The wording used in the Gambling Commission guidance to Local Authorities advises that the purpose of the Statement of Gambling Principles is to promote the licensing objectives. The workshop members as advised see no reason to amend this.</p>

	licensing objectives save for the Gambling Commission.	
I	Paragraph 14.15 suggests that the applicant proposes conditions. This paragraph should be re-drafted, again to avoid any confusion with regard to the application requirements. Whereas in Licensing Act 2003, applicants are required to specify the steps that are to be taken to promote the licensing objectives and those steps are translated into premises licence conditions, there is nothing similar within Gambling Act 2005 or the prescribed application forms.	The wording of the paragraph allows for the option for conditions proposed by the applicant (usually by way of the risk assessment) to be added by the licensing authority should it feel that the issue is not covered by the mandatory conditions as per the guidance. Members did not feel it was detrimental to keep this in as an option if necessary.
I	The mandatory and default conditions under Gambling Act 2005 are designed to ensure operation which is consistent with the licensing objectives and in the circumstances, it is unlikely that additional conditions will ever be required.	The guidance to local authorities issued by the Gambling Commission guidance section 9.1 sets out licences may be subject to conditions in a number of ways which includes that they may be attached to premises licences by licensing authorities. It may be unlikely that it is necessary, but members felt we would not want to fetter our discretion if thought it proportionate to add further conditions.

I	<p>Paragraph 15 explains the requirements for local risk assessments. Paragraphs 15.3, 15.4 and 15.5 contain lists of bullet points that the Licensing Authority expect to be considered when conducting a local risk assessment. These lists of bullet points need to be re-drafted to remove considerations that have no bearing on whether the application is consistent with the licensing objectives.</p> <p>For example, in paragraph 15.3, the final two bullet points are “known problems in the area such as problems arising from street drinkers, youth participating in antisocial behaviour, drug dealing activity etc.” and “the proximity of churches, mosques, temples or any other place of worship.” Neither of these considerations are relevant to an assessment of risk to the licensing</p>	<p>Known issues with problems from street drinkers, in the bullet point are not purely to do with antisocial behaviour which we accept is outside this policy, however these behaviours are indicative of vulnerable individuals who may be more susceptible to harm from gambling and such this is a relevant consideration for applicants when formulating their local risk assessment.</p> <p>The second bullet point references the proximity to churches and mosques. This is covered within with Equalities assessment and is relevant in protecting people from some ethnic groups. Studies show that gambling-related harm is influenced by cultural norms, so some gamblers and their close associates experience additional harm like shame and isolation if seen going into gambling premises near where they worship.</p> <p>It is not proposed to amend or remove these bullet points.</p>
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	objectives. The former bullet point details issues which are largely nuisance and have no bearing on the licensing objectives. The second bullet point needs to be expanded if it is to be included as whilst it is to be accepted, that churches, mosques or temples may drive footfall, the mere presence of one of these religious buildings cannot have any bearing on the licensing objectives.	
I	Paragraph 15.4 contains a bullet point that reads “gambling trends that may mirror financial payments such as paydays, payday loans or benefit payments.” This should be removed as this infers that any person in either paid employment or receiving benefits is automatically vulnerable. There is no evidence to support this.	<p>The inclusion of this bullet point is to ensure that any local trends that emerge relating to pay day loans and gambling harm will be addressed in premises risk assessments. The use of pay day loans and other benefit payments to fund gambling habits would indicate harmful levels of gambling.</p> <p>If such trends emerge the Licensing Authority would require that the premise address this within their premises risk assessment. If there are no such trends it is not required.</p> <p>Members did not feel as advised that the inclusion of this bullet point inferred that all those in employment or in receipt of benefits were deemed to be vulnerable and as such do not support removal of this bullet point</p>
	Finally, paragraph 15.5 contains a bullet point	This has been addressed in the previous response to 15.3. We accept these types of behaviours are antisocial and ASB is not a separate consideration for the Licensing

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	<p>which again refers to antisocial behaviour, graffiti, tagging and underage drinking. For the reasons given above, none of these considerations are relevant to any assessment of risks to the licensing objectives and therefore this bullet point should be removed.</p>	<p>Authority in these applications. But it must consider the Licensing Objectives and evidence of such ASB in a local area could be indicative of wider issues. This type of behaviour is often displayed by vulnerable individuals who may be more susceptible to harm from gambling and such this is a relevant consideration to be included in the local a risk assessment.</p>
	<p>Paragraph 18 explains the Licensing Authority's approach to the imposition of conditions on premises licences. This section would be assisted by a clear explanation that the mandatory and default conditions are designed to ensure operation that is consistent with the licensing objectives and that further conditions will only be required if there is clear evidence of risk to the licensing objectives that is not dealt with by the applicant elsewhere.</p>	<p>This is acknowledged and a suggested addition to 18.1 is recommended which is highlighted in yellow.</p> <p>Premises licences will be subject to the requirements set out in the Act and regulations, as well as specific mandatory and default conditions which will be detailed in regulations issued by the Secretary of State for each category of premises. The Licensing Authority will consider the Local Risk Assessment undertaken by the Applicant where required, as part of any application for a premises licence and may exclude default conditions if appropriate and attach others where it is believed to be necessary</p>