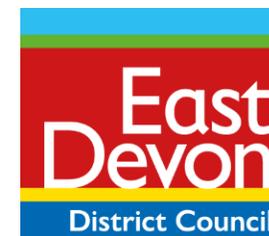


EAST DEVON DISTRICT COUNCIL



STATEMENT OF LICENSING POLICY CONSULTATION

Gambling Act 2005

REPRESENTATIONS AND RESPONSES

under the

GAMBLING ACT 2005

Consultation Period: 26 August 2021 to 24 October 2021

Table Headings

1 Reference number	A unique number given to the particular representation
2 Policy paragraph number	This identifies the section of the Policy to which the representation relates
3 Respondent	The identification of the individual, company or organisation responding
4 Details of comments	A copy of the representation made
5 Appraisal of comments	Sets out the appraisal of the representation and whether an amendment is necessary
6 Council's Response	Details the section of the policy that has been amended

Consultation Responses received – August/October 2021

1	2	3	4	5	6
DCP	N/A	Devon & Cornwall Police Licensing	Response received acknowledging the consultation and with no comments to provide.	No changes necessary in the draft policy.	No response required
GA1	N/a	GambleAware (Registered Charity)	<p>Thank you for consulting us on your draft Statement of Principles under the Gambling Act 2005.</p> <p>Due to resource constraints on a small charity, we are not able to offer specific feedback on your policy. However, 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.</p> <p>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:</p>	<p>While GambleAware have confirmed that they are not able to offer specific feedback, they have said that they support local authorities who carry out a local area profile to identify areas with increased levels of risk.</p> <p>The response that includes a new link to GambleAware's interactive maps designed for use by local authorities is a positive development that will support the work to prepare a more detailed Local Area Profile.</p> <p>Whilst this is not a mandatory requirement of the Gambling Act 2005, it is the desire of this licensing authority to adopt a Local Area Profile in the future and this response will assist in that work.</p>	No response required however the interactive map will support work to prepare a Local Area Profile

			<ul style="list-style-type: none"> • https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach • https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales <p>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 socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services.</p> <p>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</p> <p>Many thanks,</p> <p>BeGambleAware.org</p>	<p>This can give a useful insight into the local area and any particular Wards or towns of the district with increased levels of risk for with a useful key separating the level of problem gambling that has been identified.</p> <p>This will be particularly useful for populating locations across the districts in conjunction with the location of gambling premises and where there can be high populations of groups considered to be vulnerable.</p> <p>The towns of Exmouth, Sidmouth, Seaton and Honiton currently have a number of betting shops, totalling 7 across the district (down by 2 from 2018). In addition, East Devon has 1 licensed bingo premises (down by 1) and 4 adult gaming centres which are situated in various coastal resorts (numbers haven't changed).</p> <p>In 2018/19 it was considered that a Local Area Profile was not necessary at that time due to the low density and number of gambling premises across the district.</p> <p>In preparing the consultation in 2021, this authority has considered that it is necessary to develop and to adopt a Local Area Profile. The revision of the policy will need further progress as a living document with relevant data being included.</p> <p>East Devon has a dispersed and mainly rural population with a low population density that up to now has not needed a Local Area Profile although the data that may be forthcoming from GambleAware's interactive map (in conjunction</p>	
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				<p>with those premises which hold a gambling premises licence) will assist in the future.</p> <p>The focus on the seaside economy, changing tourist gamblers at varying seasons, together with the interactive maps detailing online (problem) gambling presents a challenge in developing a Local Area Profile and the licensing authority will keep this under review over the period of this policy.</p>	
CTC	N/a	Cranbrook Town Council Clerk	<p>EDDC's recent invitation to respond to its Gambling Policy Consultation was discussed by the town council at their meeting on 20th September 2021.</p> <p>The Town Council wholeheartedly supports the licensing objectives set out in Section 1.1 of the policy. The policy document itself clearly sets out how the licensing authority proposes to achieve the licensing objectives in accordance with guidance by the Gambling Commission.</p> <p>However, whilst perhaps not strictly a licensing matter, the draft policy appears very light on any policy approach in relation to problem gambling and gambling addiction.</p> <p>Online gambling is also a very difficult area to control which is not bound to a particular premises but perhaps the policy could reference and reflect online gambling, especially as it is trying to protect the young and vulnerable.</p> <p>I hope the Town Council's comments can be taken into consideration.</p>	<p>Cranbrook Town Council have resolved to support the draft policy and a response was provided.</p> <p>With regard to comments concerning gambling addiction and online gambling, a response outlined that online gambling, it is a responsibility managed by the Gambling Commission with regard to the companies involved and also the subsequent harm arising from addiction.</p> <p>Although the Commission highlights and leads on the problems of gambling addiction, the licensing authority will include suitable links to the Commission's website in relation to Safer Gambling - Gambling Commission that can be added within the policy document .</p>	<p>Yes</p> <p>Part A 11.2</p> <p>Help and guidance in relation to Safer Gambling - Gambling Commission</p>