

## Cullen, Ian (City of Lincoln Council)

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**From:** [REDACTED]  
**Sent:** 23 August 2018 12:20  
**To:** Cullen, Ian (City of Lincoln Council)  
**Subject:** RE: Gambling Act 2005 Policy Consultation - City of Lincoln Council  
**Attachments:** GamCare Local Authorities Brochure 2018 (web-version).pdf; GamCare Training Brochure 2017.pdf

Hello,

Thank you for your email, 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 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 Player Protection Code of Practice. If you would like more information on how our audit can support Local Licensing Authorities, please contact [REDACTED]

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,  
Catherine

Catherine Sweet  
Head of Marketing and Communications  
[REDACTED]  
[REDACTED]



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**From:** Info  
**Sent:** 23 August 2018 10:53  
**To:** Catherine Sweet  
**Subject:** FW: Gambling Act 2005 Policy Consultation - City of Lincoln Council

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**From:** Cullen, Ian (City of Lincoln Council) <[Ian.Cullen@lincoln.gov.uk](mailto:Ian.Cullen@lincoln.gov.uk)>  
**Sent:** 21 August 2018 16:43  
**Subject:** Gambling Act 2005 Policy Consultation - City of Lincoln Council

**This Message originated outside your organization.**

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Dear all,

## **GAMBLING ACT 2005 – STATEMENT OF LICENSING POLICY**

The Gambling Act 2005 requires all licensing authorities to prepare and publish a statement of the principles that they propose to apply in exercising their functions under the Act during the three-year period to which the policy applies.

The list of persons to be consulted is deliberately wide and thus enables us to undertake a comprehensive consultation exercise with anyone who may be affected by or otherwise have an interest in the licensing statement and give appropriate weight to the views of those it has consulted before publishing the statement.

Therefore, if you have an interest in the functions of the Council in respect of the Gambling Act you are invited to comment on the draft policy. If I have directed the draft policy to the wrong person within your organisation, please accept my apologies and I would request that you either let me know the correct contact or pass it directly to that person.

The consultation period ends on **2<sup>nd</sup> October 2018** and any response(s) you have would need to be received before that date. You can respond by contacting me at the below addresses either by email or in writing.