

**STATEMENT OF GAMBLING PRINCIPLES
CONSULTATION COMMENTS
JUNE 2018 - SEPTEMBER 2018**

From: [REDACTED]
Sent: 27 June 2018 15:18
To: Lewis, Stephen; [REDACTED]
Subject: RE: Statement of gambling licensing policy – A Councillor's Guide

Hi Steve,
I would be very happy to write to the relevant government team or the Leader of the House who schedules business.
Whom are the GC lobbying?
Regards
[REDACTED]

From: Lewis, Stephen
Sent: 20 June 2018 12:56
To: [REDACTED]
Subject: RE: Statement of gambling licensing policy – A Councillor's Guide

Cllrs,

The report will be at Licensing Committee this Thursday with a three month consultation period so we can capture views.

You should also be aware that although the proposal to reduce FOBTs was accepted, my understanding from meeting with the Gambling commission last Tuesday is that it will need to be in approved in parliament via secondary legislation. Timelines on this are unknown.

We can organise when it is best to get together tomorrow, I'm flexible and happy to do evenings.

Regards,

Steve

Steve Lewis
Head of Environmental Health
Tamworth Borough Council
Tel:01827 709437

From: [REDACTED]
Sent: 20 June 2018 12:04
To: Lewis, Stephen
Cc: [REDACTED]
Subject: RE: Statement of gambling licensing policy – A Councillor's Guide

Thanks Steve,
I was delighted by the decision in favour of the lowering of fixed odds gambling limits. One of the groups we are accommodating under Heart of Tamworth's social outreach work is "Gambler's Anonymous".

Representing one of the most deprived areas in the country I feel very strongly that we need as many controls as possible.

[REDACTED] is a trained lawyer and is continuing on the Licensing committee and I would be grateful if you would arrange to meet her to cover this and other areas of legislative development – she is also the Chair of Heart of Tamworth.

Kind regards
[REDACTED]

From: Lewis, Stephen

Sent: 20 June 2018 09:22

To: [REDACTED]

Subject: Statement of gambling licensing policy – A Councillor's Guide

Councillors

Good morning,

Can I draw your attention to the above guidance, <http://www.gamblingcommission.gov.uk/PDF/quick-guides/Councillors-guide.pdf>

A copy is also on the shared drive in your folder S:Councillors/Licensing/2018.

You may wish consult this with the review of Gambling Policy consultation.

Regards,

Steve

Steve Lewis

Head of Environmental Health

Tamworth Borough Council

Tel:01827 709437

From: Info@britishhorseracing.com [mailto:Info@britishhorseracing.com]

Sent: 12 July 2018 07:11

To: Lewis, Stephen

Subject: RE: Consultation - Revised statement of Principles (Gambling Policy 2019-2022)

Thank you for your email to the British Horseracing Authority. It is our aim to respond to all enquiries within seven days but please do bear with us during busy periods. We look forward to responding to your query shortly.

From:[REDACTED]

Sent: 12 July 2018 12:16

To: Lewis, Stephen

Subject: RE: Consultation - Revised statement of Principles (Gambling Policy 2019-2022)

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/
- 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,
[REDACTED]

[REDACTED]
Head of Marketing and Communications
T: 020 7801 7028
E: [REDACTED]

From: [REDACTED]
Sent: 29 August 2018 12:41
To: Lewis, Stephen
Subject: Re: 180703_GAMBLING POLICY 2019-2022 draft

Dear Steve

It was good to meet you properly last week and I found the gambling discussion very interesting.

I have had a read through the document which I thought was very well put together, clear and thorough.

I have made a couple of points via 'comments' and a few amendments via 'Track changes' - mostly typos and formatting - which you can keep or bin as you wish. As we discussed, I wonder if we could also make sure all available guidance is on the website (it may already be there), in the interests of openness and transparency. I think this would have two effects - it will make all requirements clear to providers and encourage them towards best practice, and it means that should they transgress, they will not be able to claim ignorance.

Many thanks
[REDACTED]

---Original message---

From : Stephen-Lewis@tamworth.gov.uk
Date : 21/08/2018 - 11:26 (GMTST)
To : [REDACTED]

Subject : 180703_GAMBLING POLICY 2019-2022 draft

[REDACTED],

Good morning,

Many thanks for your time today,

Best regards,

Steve
01827709437