## Appendix D

## **South Hams District Council**

## STATEMENT OF PRINCIPLES (Gambling Act 2005) CONSULTATION RESPONSE

NAME OR ORGANISATION	COMMENTS	APPRAISAL	SUGGESTED AMENDMENTS
GambleAware is an independent charity tasked to fund research, education and treatment services to help to reduce gambling-related harms in Great Britain.	Thank you for consulting us on your draft Statement of Principles under the Gambling Act 2005.  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.	The maps referred to are described on their website as: 'These maps represent a starting point in understanding some of the differences at ward and local authority level. It is anticipated that they will be useful to national and local public health teams and healthcare commissioners in building their understanding of gambling in their local authority area.' The maps are interesting and will aid Public Health when analysing health concerns in the local area, which may then influence future gambling policies.	No amendments required.
	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: <a href="https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach">https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach</a> <a href="https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales">https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales</a>	Both publications referred to by GambleAware were taken into consideration during the review of the policy in 2018 and the relevant information is still included in this updated version.	No amendments required.

	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.  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 <a href="https://www.begambleaware.org">www.begambleaware.org</a> . Both are part of the National Gambling Treatment Service and offer free, confidential advice and support for those who may need it.	There is no requirement for South Hams District Council to produce a local area profile and we have decided at this time we are not in a position to do so. Its creation is dependent on information and knowledge of the local area gathered by partner agencies and other relevant organisations who have the expertise and knowledge of the impact of gambling in the locality, in particular Public Health. In the three previous years no information or data has been submitted, despite being openly requested in the previous policy. The Council is considering putting such a profile together in the future, depending on the resources available.  At 15.7 of the policy document it states: "This Licensing Authority encourages operators to have information and links to appropriate accredited agencies for help and support available to customers, such as the National Problem Gambling Helpline and GamCare." The name of the helpline has been amended and it may be helpful to include the number as well as the website address.	Last sentence at 15.7 of the policy to be updated as follows: "This Licensing Authority encourages operators to have information and links to appropriate accredited agencies for help and support available to customers, such as the National Gambling Helpline (0808 8020 133) and GamCare. Further information is also available on the Gamble Aware website:  www.begambleaware.org "
John Pope, Harford Parish Clerk	My comment is that gambling is a pernicious evil that causes much destitution and misery, and that to the greatest extent permitted by the law the council should actively seek to minimise the number of gambling establishments.	While the Licensing Authority is able to reduce the negative impact of the gambling activities it controls through regulation and by ensuring premises promote the licensing objectives, it does not have the power to limit	No amendments required.

	the number of gambling establishments through this policy.	