

# Report

## Council

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### Part 1

Date: 25 January 2022

**Subject** **Gambling Act 2005 – Statement of Principles**

**Purpose** To seek approval and adoption of the revised Gambling Act 2005 Council Statement of Principles.

**Author** Alastair Dearling, Licensing Manager

**Ward** All wards

**Summary** The Gambling Act 2005 requires that before each successive period of three years, the Council, in its role as the Licensing Authority, prepares and publishes a statement of the principles it proposes to apply in exercising its functions under the Act during that period. The current statement of principles lapses on 31 January 2019. A review of the statement of principles has been conducted and their draft has been published for consultation. The formal consultation period was between 16 August 2021 and 31 October 2021. The Authority received one response from the consultation and was able to make several minor amendments as a result. The Cabinet Member of Licensing & Regulation approved the consultation process and has been briefed on the response.

**Proposal** That Council approves and adopts the revised Statement of Principles under the Gambling Act 2005.

**Action by** Head of Law and Regulation

**Timetable** As soon as is practicable

This report was prepared after consultation with:

- Head of Finance
- Head of People and Business Change
- Head of Law & Regulation

**Signed**

## Background

Section 349 of the Gambling Act 2005 requires a licensing authority, before each successive period of three years prepares a statement of the principles, they propose to apply in exercising their functions under the Act during that period and publish the statement.

The Gambling Commission's "Guidance to Licensing Authorities", which is statutory guidance published under the Gambling Act 2005, explains that: "The statement of policy forms the licensing authority's mandate for managing local gambling provision and sets out how the licensing authority views the local risk environment and therefore its expectations in relation to operators with premises in the locality".

The current statement of principles covers the period from 31 January 2019 to 31 January 2022 and a revised statement is now required to take effect for the three-year period that will begin on 31st January 2022.

The existing statement has been effective and so the proposed changes are mainly updated references, data and dates rather than any changes to the meaning of any principle within the statement. It should be noted that the UK Government is currently undertaking a review of the Gambling Act 2005 and a White Paper is expected in the coming months. This may lead to significant legislative changes. If this is the case, there may be a more comprehensive review of the statement as a result prior to the end of the current three-year period.

The formal consultation period was between 16 August 2021 and 31 October 2021. The Authority received one response from the consultation and was able to make several minor amendments as a result. The consultation response was from the solicitors acting for the Betting and Gaming Council. The consultation response is attached as Appendix A. The Cabinet Member of Licensing & Regulation approved the consultation process and has been briefed on the response and the minor alterations/

The points raised in the consultation responses and the proposed action because of each of these points is set out in a table that is attached to the report as Appendix B.

Amendments to the draft statement of principles have been proposed in view of the consultation responses and a revised version of the draft statement is attached to the report as Appendix C. The proposed changes are shown as track-changes throughout the document.

### Financial Summary (Capital and Revenue)

	Year 1 (Current) £	Year 2 £	Year 3 £	Ongoing £	Notes including budgets heads affected
Costs (Income)	0	0	0	0	There are no costs or financial implications relating to this proposal
Net Costs	0	0	0	0	
(Savings) Net Impact on Budget	0	0	0	0	

### Risks

Risk Title / Description	Risk Impact score of Risk if it occurs* (H/M/L)	Risk Probability of risk occurring (H/M/L)	Risk Mitigation Action(s) What is the Council doing or what has it done to avoid the risk or reduce its effect?	Risk Owner Officer(s) responsible for dealing with the risk?
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The statement of principles is not put in place as required by statute	H	L	Presentation of statement of principles to council prior to the end of the three-year period.	Licensing Manager
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### Links to Council Policies and Priorities

- Ensuring that an appropriate Statement of Principles is in place as required by statute will support the following Council Policies and Strategies:
- Newport City Council's Corporate Plan 2017-2022 (Building on Success, Building a Better Newport)

### Options Available and considered

Option 1: To approve the revised Statement of Principles under the Gambling Act 2005. This will ensure that the Council fulfils its duty as the Licensing Authority to have the Policy in place by the appointed day.

Option 2: To make amendments to the revised Statement of Principles under the Gambling Act 2005 and send the Statement of Principles out for further consultation.

### Preferred Option and Why

The Statement of Principles has undergone very few changes since the last statement which served the city well; an appropriate consultation process was carried out and the views of the responder have been fully considered and acted upon; the Statement of Principles has been produced in consultation with neighbouring authorities and represents a consolidation of best practice; there is a statutory deadline of 31 January 2022.

For these reasons it is recommended that option 1 is agreed.

### Comments of Chief Financial Officer

There are no financial implications arising from amending the Gambling Act Statement of Principles, the changes following consultation are in relation to dates, reference and data and do not alter any underlying principles and so there is no budgetary impact.

### Comments of Monitoring Officer

The draft Statement of Principles complies with the Council's statutory duty under Section 349 of the Gambling Act 2005 and reflects the Regulations and Guidance issued by the Gambling Commission. The Council has a duty under the Gambling Act to prepare and publish a Statement of Principles that it proposes to apply in exercising its function under the Act and to review that Statement every three years. The current Statement was adopted in January 2019 and, therefore, needs to be reviewed and re-adopted in January 2022. There are no substantive changes proposed and the new Statement has just been updated to reflect changes to Gambling Commission's Guidance/Code of Practice and includes additional guidance to applicants on local risk assessments the suitability of locations for gambling premises. In accordance with the legislation and guidance, the Council is required to consult with the public and key stakeholders before adopting the revised Statement. Formal consultation was undertaken between 16<sup>th</sup> August 2021 and 31<sup>st</sup> October 2021 and one formal consultation response was received from solicitors acting on behalf of the gambling trade. Where appropriate, minor amendments have been made to the draft Statement to reflect this consultation response. Therefore, Council is now requested to formally approve and adopt the revised Statement of Principles. A FIEA is also attached to this Report, which set out how the revised Statement complies with the Council's public sector equalities and socio-economic duties under the Equality Act and also meets the well-being principles and objectives.

## **Comments of Head of People and Business Change**

The Council's Gambling Act Statement of Principles are in line with the Council's own well-being objectives and with the Newport Offer and Strong Resilient Communities interventions in Newport's Well-being Plan: the statement recognises that responsible gambling can be a source of leisure and can boost the local economy through attracting visitors, especially alongside sporting events, but that gambling can also be addictive and have negative consequences on local communities. As such, the Statement notes the importance of partnership working in achieving the Council's licensing objectives and notes that the Council will continue to work with neighbouring authorities, members of One Newport Partnership (notably Gwent Police, Public Health Wales and Aneurin Bevan University Health Board), local businesses, local people and those involved in child protection.

There are no HR implications arising directly from this report

### **Fairness and Equality Impact Assessment:**

- **Wellbeing of Future Generation (Wales) Act**
- **Equality Act 2010**
- **Socio-economic Duty**
- **Welsh Language (Wales) Measure 2011**

A Fairness & Equality Impact Assessment is attached in Appendix D of the report.

### **Crime and Disorder Act 1998**

One of three fundamental objectives under the Gambling Act 2005 is to prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

### **Consultation**

Section 349 of the Gambling Act 2005 provides that in preparing a revision of the statement of principles, the Authority shall consult with:

- The chief officer of police for the Authority's area,
- One or more persons who appear to the Authority to represent the interests of persons carrying on gambling businesses in the Authority's area; and
- One or more persons who appear to the Authority to represent the interests of persons who are likely to be affected by the exercise of the Authority's functions under this Act.

The Gambling Commission guidance explains that this is "*deliberately wide*" as it allows "*Licensing Authorities to undertake a comprehensive consultation exercise with anyone who may be affected by or otherwise have an interest in their statement of policy*".

The Guidance further provides that "*It is a matter for licensing authorities to develop their own consultation practices, including the methods for consultation and who they consider it necessary to consult with, which might include consultation with relevant local groups, business and responsible authorities.*"

The consultation process followed a similar format to previous years and as minimal changes were proposed to the existing Statement of Principles, the duration of the consultation was set at 8 weeks. A formal notification was sent to the Chief Constable of Gwent Police, as specifically required under the Gambling Act 2005; and a written notification was sent to each responsible authority under the Act, local gambling businesses, formal consultation via the council's website to allow local residents, community groups, businesses and others to respond, and via social media.

## **Background Papers**

Proposed Statement of Principles [Attached]

Gambling Act 2005: <http://www.legislation.gov.uk/ukpga/2005/19/contents>

Guidance to Licensing Authorities <https://www.gamblingcommission.gov.uk/home.aspx>

Newport City Council Statement of Policy 2019 <http://www.newport.gov.uk/en/Business/Licences--permits/Gambling/Gambling-licences.aspx>

Dated:

Appendix A

## Consultation Response Gosschalks Solicitors

Richard Taylor

BY EMAIL ONLY  
LICENSING DEPARTMENT  
NEWPORT CITY COUNCIL

**Please ask for:**

**Direct Tel:** 01482 590216

**Email:** rjt@gosschalks.co.uk

**Our ref:** RJT / MJM / 123267.00001  
#GS4159223

**Your ref:**

**Date:** 27 October 2021

Dear Sirs,

### Re: Gambling Act 2005 Policy Statement Consultation

We act for the Betting and Gaming Council (BGC) and are instructed to respond on behalf of the BGC to your consultation on the review of your Gambling Act 2005 Statement of Principles.

#### The Betting and Gaming Council

The Betting and Gaming Council (BGC) was created in 2019 as the new standards body for the UK's regulated betting and gaming industry. This includes betting shops, online betting and gaming businesses, bingo and casinos. Its mission is to champion industry standards in betting and gaming to ensure an enjoyable, fair and safe betting and gaming experience for all of its members' customers.

BGC members support 119,000 jobs and account for £4.5 billion to the Treasury annually in tax. Recent study also showed that BGC members contributed around £7.7 billion in gross value added to the UK economy in 2019.

The gambling industry is integral to the survival of sport. Betting companies spend over £40 million a year on the English Football League (EFL) and its clubs. Horse racing, an industry estimated to be worth £3.5 billion a year to the UK economy and which generates 85,000 jobs receives over £350 million per annum through the Horse Racing Industry Levy, media rights and sponsorship. Darts and Snooker receive in excess of £10 million per annum which represents 90 % of all sponsorship revenue.

The BGC has four principal objectives. These are to –

- **create a culture of safer gambling throughout the betting and gaming sector, with particular focus on young people and those who are vulnerable**
- **ensure future changes to the regulatory regime are considered, proportionate and balanced**
- **become respected as valuable, responsible and engaged members of the communities in which its members operate**
- **safeguard and empower the customer as the key to a thriving UK betting and gaming industry**

Before we comment on your draft policy document, it is important that the backdrop against which the comments are made is established.

### **Betting and Gaming in the UK**

Betting and gaming is an incredibly important part of the UK leisure and hospitality industry, employing over 70,000 people, including 50,000 in betting, 13,000 in casinos and 10,000 people directly employed online. The betting and gaming industry contributes £8.7 billion Gross Value Added to the UK economy & contributes £3.2 billion to HM Treasury. In addition, casinos contribute over £120 million to the tourism economy each year.

Betting and gaming is widely enjoyed in the UK. Around 30 million people participate in some sort of gambling, whether that is on the National Lottery, placing a bet in betting shops, playing in casinos or at bingo. The overwhelming majority of these people do so safely without reporting any problems.

Any consideration of gambling licensing at the local level should also be considered within the wider context.

- The overall number of betting shops is in decline. The latest Gambling Commission industry statistics show that the number of betting offices (as of March 2020) was 7681. This is reducing every year and has fallen from a figure of 9137 in March 2014. Covid 19 had a devastating effect on the betting industry. The number of betting offices in June 2020 was down to 6461.
- Planning law changes introduced in April 2015 have increased the ability of licensing authorities to review applications for new premises, as all new betting shops must now apply for planning permission.
- In April 2019 a maximum stake of £2 was applied to the operation of fixed odds betting terminals
- Successive prevalence surveys and health surveys tells us that problem gambling rates in the UK are stable and possibly falling.

### **Problem Gambling**

Problem gambling rates are static or possibly falling. The reported rate of 'problem gambling' (according to either the DSM-IV or the PGSI) was 0.8% of the adult population in 2015, in 2016 it was 0.7% and in 2018 it was 0.5% of the adult population.

This is termed statistically stable but is encouraging that we might finally be seeing a reduction in problem gambling due to the raft of measures that have been put in place recently both by the industry, the Gambling Commission and the Government – from a ban on credit cards, restrictions to VIP accounts, new age and identity verification measures and voluntary restrictions on advertising. These rates have remained broadly the same since the introduction of the Gambling Act 2005.

Whilst one problem gambler is too many, both the Government and regulator both say there is no evidence that problem gambling has increased in recent years.

During the Covid-19 period of lockdown, both the Gambling Commission and Government have acknowledged that problem gambling levels have not increased.

In June 2020, the BGC's five largest members committed to increasing the amount they spend on research, education and treatment (RET) services from 0.1 per cent to 0.25 per cent of their annual revenue in 2020, 0.5 per cent in 2021, 0.75 per cent in 2022 and 1 per cent in 2023. The five operators confirmed they will provide £100 million to GambleAware charity to improve treatment services for problem gamblers.

Rates of 'problem gambling' in the UK are low by international standards – compared to France (1.3%), Germany (1.2%), Sweden (2.2%) and Italy (1.27%).

The BGC supported the creation of the new NHS gambling treatment clinics who have promised 22 clinics, 3 of which are open now. We are pleased that the NHS have committed to work to increase the number of clinics in the UK in addition to existing services delivered by Gordon Moody Association and GamCare's 120 treatment centres located throughout the UK.

The BGC welcomes the Gambling Commission's National Strategy as a way of accelerating progress on responsible gambling and tackling problem gambling. Our members are fully committed to meeting this challenge and are working tirelessly to deliver new responsible gambling initiatives including technology that tackles problem gambling and supporting a statutory levy and increased funding for problem gambling clinics.

Underage participating by those aged 11-16 in any gambling activity has declined from 22% to 11% over the past decade; here, 'gambling activity' mainly relates to personal betting (e.g. playing cards with friends) and legal play of lotteries (e.g. participating with consent of parents / guardians). BGC members have a zero tolerance to those under the age of 18 attempting to use their products.

### **Working in partnership with local authorities**

The BGC is fully committed to ensuring constructive working relationships exist between betting operators and licensing authorities, and that where problems may arise that they can be dealt with in partnership. The exchange of clear information between councils and betting operators is a key part of this and the opportunity to respond to this consultation is welcomed.

### **Differentiation between Licensing Act 2003 and Gambling Act 2005 applications**

When considering applications for premises licences, it is important that a clear distinction is made between the regimes, processes and procedures established by Gambling Act 2005 and its regulations and those that are usually more familiar to licensing authorities – the regimes, processes and procedures relating to Licensing Act 2003.

Whilst Licensing Act 2003 applications require applicants to specify steps to be taken to promote the licensing objectives, those steps being then converted into premises licence conditions, there is no such requirement in Gambling Act 2005 applications where the LCCP provide a comprehensive package of conditions for all types of premises licence.

It should continue to be the case that additional conditions in Gambling Act 2005 premises licence applications are only imposed in exceptional circumstances where there are clear reasons for doing so. There are already mandatory and default conditions attached to any premises licence which will ensure operation that is consistent with the licensing objectives. In the vast majority of cases, these will not need to be supplemented by additional conditions.



The LCCP require that premises operate an age verification policy. The industry operates a policy called "Think 21". This policy is successful in preventing under-age gambling. Independent test purchasing carried out by operators and submitted to the Gambling Commission, shows that ID challenge rates are consistently around 85%.

When reviewing draft statements of principles in the past, we have seen statements of principles requiring the operation of Challenge 25. Unless there is clear evidence of a need to deviate from the industry standard then conditions requiring an alternative age verification policy should not be imposed.

The BGC is concerned that the imposition of additional licensing conditions could become commonplace if there are no clear requirements in the revised licensing policy statement as to the need for evidence. If additional licence conditions are more commonly applied this would increase variation across licensing authorities and create uncertainty amongst operators as to licensing requirements, over complicating the licensing process both for operators and local authorities

### **Considerations specific to the draft Gambling Act 2005 Statement of Licensing Principles 2022 to 2025**

Paragraph 2.1 refers to an, "*onus on the premises licence holder to complete a risk assessment based on code 8 the Social Responsibility Code.*" As acknowledged later in the draft statement of principles, it is SR Code Provision 10 that requires operators to conduct local risk assessments and this paragraph should be amended to reflect that.

Paragraph 2.4 (Location) refers to the possibility of a specific policy with regard to areas where gambling premises should not be located. This sentence should be removed. Any such policy is likely to be unlawful and is certainly contrary to the section 153 "aim to permit" principle. Furthermore, the use/mix of use of premises in an area is an issue for the Planning Authority and the Licensing Authority should be careful not to trespass into that domain. This is especially the case given the next paragraph (2.5) which is clear that the Licensing Authority will seek to avoid any duplication within the statutory regulation systems where possible, including planning.

Paragraph 2.8 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 that attach to all premises are intended to be sufficient to ensure operation that is reasonably consistent with the licensing objectives. This section states that regard will be given to the local risk assessment, but it should be made clear that additional conditions will only be considered in exceptional circumstances where there is clear evidence of a risk to the licensing objectives in the circumstances of a particular case that is not adequately addressed by the policies, procedures, and mitigations policies outlined in an applicant's local area risk assessment.

Paragraph 6 explains the requirements for operators to conduct risk assessments. This section is too prescriptive with the licensing authority dictating what is to be included and matters that it expects to be considered. This section should be abridged to simply outline the requirements of SR Code Provisions 10.1 and 10.2, acknowledging that operators are best placed to assess the risks posed by their proposals and the bullet point lists amended to exclude matters that are not relevant to any assessment of risk to the licensing objectives. One bullet point indicates that the risk assessment is expected to consider "*Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activity etc.*" It is impossible to see how these activities can be relevant to an assessment of risk to the licensing objectives.


Similarly, “Areas that are prone to issues of youths participating in anti-social behaviour, including such activities as graffiti tagging, underage drinking etc.” should be removed from the next bullet point list as these issues are not relevant considerations when assessing risk to the licensing objectives. The bullet point that reads, “Gaming trends that may coincide with dates for financial payments such as pay days or benefits payments” should be removed as these can only be relevant to an assessment of risk to the licensing objectives if the authority’s view is that anyone in receipt of benefits or indeed paid employment is deemed vulnerable or likely to commit crime as a result of gambling.

The final list of bullet points refers to “matters of faith” as a potential consideration. This is not a relevant consideration to any assessment of risk to the licensing objectives and should be removed.

### **Conclusion**

On behalf of the BGC, we thank you for the opportunity to comment on your draft statement of principles and hope that these comments above are useful. The BGC will work with you to ensure that its members’ operation of its premises will operate in accordance with the licensing objectives.

Yours faithfully,

A handwritten signature in cursive script that reads "Goschalks".

**GOSSCHALKS LLP**

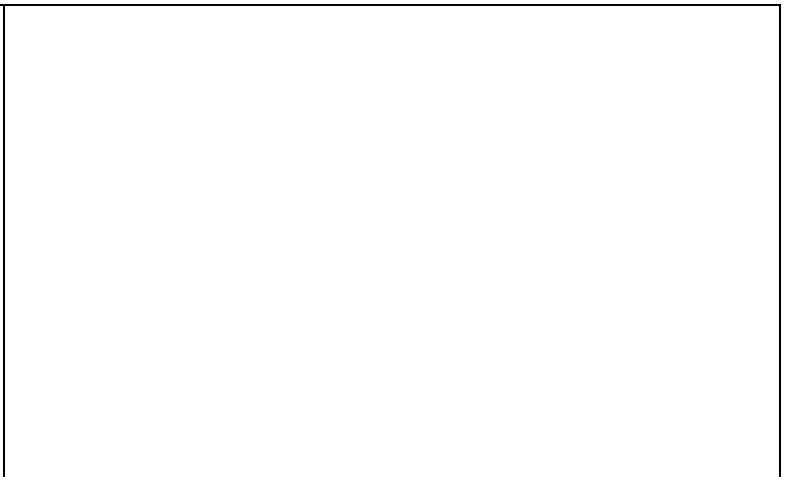
## Appendix B

### Proposed actions to address The Betting & Gaming Council consultation response.

Comment	Response
<p>It should continue to be the case that additional conditions in Gambling Act 2005 premises licence applications are only imposed in exceptional circumstances where there are clear reasons for doing so. There are already mandatory and default conditions attached to any premises licence which will ensure operation that is consistent with the licensing objectives. In the vast majority of cases, these will not need to be supplemented by additional conditions. The BGC is concerned that the imposition of additional licensing conditions could become commonplace if there are no clear requirements in the revised licensing policy statement as to the need for evidence. If additional licence conditions are more commonly applied this would increase variation across licensing authorities and create uncertainty amongst operators as to licensing requirements, over complicating the licensing process both for operators and local authorities.</p>	<p>Paragraph 2.8 of the draft statement provides: All Gambling Act 2005 premises licences are subject to mandatory and default conditions. Additional conditions will only be considered where there is clear evidence of a risk to one or more of the licensing objectives and in circumstances where there is a need to supplement the mandatory and default conditions. In view of the second sentence in the above paragraph, it is not considered that the draft statement already addresses this concern.</p>
<p>The LCCP require that premises operate an age verification policy. The industry operates a policy called "Think 21". This No age policy is prescribed within the draft statement but reference is made to both Challenge 21 and Challenge 25 policy is successful in preventing under-age gambling. Independent test purchasing carried out by operators and submitted to the Gambling Commission, shows that ID challenge rates are consistently around 85%. When reviewing draft statements of principles in the past, we have seen statements of principles requiring the operation of Challenge 25. Unless there is clear evidence of a need to deviate from the industry standard then conditions requiring an alternative age verification policy should not be imposed</p>	<p>No age policy is prescribed within the draft statement, but reference is made to both Challenge 21 and Challenge 25. in the model conditions in Appendix B e.g. "A Challenge 21 or Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram."</p> <p>As these are model conditions that would only be imposed in individual cases where there is evidence to require them and there would be discretion given to the licence holder to decide at what age they will require identification to prove an individual's age, it is not considered that an amendment to the draft statement is required to address this concern</p>
<p>Paragraph 2.4 refers to location of premises and refers to the possibility of a specific policy with regard to areas where gambling premises should not be located. Thereafter, it appears to create a rebuttable presumption of refusal akin to a Licensing Act 2003 cumulative impact area. These references should be removed. Location will always be relevant</p>	<p>Paragraph 2.4 of the draft statement says: The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision making. As per the Gambling Commission's Guidance for local authorities, the Council will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.</p>

<p>in the context of whether a particular proposal is consistent with the licensing objectives. The potential policy referred to in the existing paragraph, however, is likely to be unlawful and is certainly contrary to the “aim to permit” principle contained within s153 Gambling Act 2005 and therefore references to it and the rebuttable presumption of refusal should be removed.</p>	<p>Should any specific policy be decided upon as regards areas where gambling premises should not be located, this Statement will be updated. It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome. We do not currently have a policy that gives the presumption that an application for a licence to take effect in any particular location or type of location would be refused. It is therefore proposed to remove the following text from the above paragraph to avoid the suggestion that the Council is considering such a policy at this time and to satisfy the concern raised: “Should any specific policy be decided upon as regards areas where gambling premises should not be located, this Statement will be updated. It should be noted that any such policy does not preclude any application being made and...” If any policy were to be introduced, it would be subject to appropriate consultation</p>
<p>Paragraph 6 refers to the [Gambling Commission’s Licence Conditions and Code of Practice (LCCP)] and in particular the requirement that operators conduct local risk assessments. This section runs for almost 10 pages, is overly prescriptive and should be significantly abridged. Any applicant (save for those in respect of track licences) will be the holder of an operating licence and therefore required to comply with the LCCP in any event. A commentary of its requirements is unnecessary. This section needs only to refer to the requirement of SR Code provision 10.1.1, that licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks and SR Code Provision 10.1.2 that the risk assessments must be updated to take into account significant changes in local circumstances. SR Code Provisions 10.1.1 and 10.2.2 provide for “relevant matters identified in the licensing authority’s statement of licensing policy” to be taken into account. The list of bullet points detailing examples of matters that could be considered needs therefore only to reflect matters that are relevant to the licensing objectives. It is impossible to see how issues such as “youths participating in anti-social behaviour” could in itself pose a risk to the licensing objectives. Similarly, the proximity of alcohol licensed premises, pawn brokers, payday lenders and job</p>	<p>It is agreed that section 6 of the draft statement contains a large amount of information, some of which is taken directly from the LCCP, whilst other parts are intended to provide guidance to applicants and licence holders when completing risk assessments. It is proposed to move this information to a separate guidance document thereby reducing the length of the section. This would mean that the remaining information would make reference to the provisions of the LCCP that are identified in the consultation response and a give a revised list of matters that the Council considers should be taken into account when applicants and licence holders develop their risk assessments. It is considered that this revised list is relevant to the licensing objectives, so the concerns raised in the consultation response would be addressed.</p>

centres cannot be relevant and “gaming trends that may mirror days for financial payments such as pay days or benefit payments” can only be relevant to an assessment of risk to the licensing objectives if the authority’s view is that anyone in receipt of benefits or indeed paid employment is deemed vulnerable or likely to commit crime as a result of gambling. This cannot be correct and references to any issue that I not relevant to the licensing objectives should be removed.



## **Appendix C**

### **Amendments to the draft Gambling Policy statement**

**As Attached**

**Appendix D**

## **Fairness and Equalities Impact Assessment (FEIA)**

**As Attached**