

## GAMBLING CONSULTATION RESPONSES

Date Received	Agency/ Respondent	Method of response	Summary of Response to Consultation	Action Taken
4 September 2023	Hough and Bollard	Written	<p>Section 4.2.3 refers to a study linking anti-social behaviour and problem gambling.</p> <p>However, recent research found no significant relationship between problem gambling and crime, after accounting for low self-control, past substance use, and juvenile delinquency. More information can be found in <a href="https://pubmed.ncbi.nlm.nih.gov/32185650/">https://pubmed.ncbi.nlm.nih.gov/32185650/</a></p>	<p>Some recent research studies do raise doubts on the link between problem gambling and crime. More data is need on the subject, as outlined by the Gambling Commission, who have asserted that further research is required to understand the association between gambling and criminal activities, the impact of unregulated markets, and crime as a form of gambling-related harm.</p> <p>As a result of this response, the relevant paragraph in the report, and the original cited research, have been removed to ensure that the emphasis remains on the expectations outlined in section 4.2.4, pertaining to the first objective. This will help avoid confusion for the users of the policy.</p>
15 October 2023	Cllr 1 – Point 1	Written	<p>Clear sight lines into AGCs and betting shops improve safety by allowing monitoring of those inside and outside.</p> <p>The balance between obscuring views and providing visibility is crucial. While concerns of attracting children are raised, seeing inside can also make them more visible.</p>	<p>If a betting premises has a clear link to crime and disorder, removal of items that obscure the view into the premises can be implemented. This is usually done as a result of a premises licence review or voluntary measures taken after concerns raised by a multi-agency team. The Gambling Commission's premises assessment toolkit provides some examples of this: <a href="https://www.gamblingcommission.gov.uk/authorities/guide/premises-assessments-toolkit#premises-assessments-case-studies">https://www.gamblingcommission.gov.uk/authorities/guide/premises-assessments-toolkit#premises-assessments-case-studies</a>.</p> <p>It is important to maintain a balanced view in such situations and to have regard for the potential commercial impact of any decisions made, alongside the need to promote the Licensing Objectives.</p>

				Therefore, we have amended the policy by adding an item for consideration at Section 4.2.4. The item is as follows: "Consider the appropriate placement of externally visible signage if better lines of sight into the premises would assist in reducing crime and anti-social behaviour related to the premises."
	Cllr 1 – Point 2	Written	Online gambling is often overlooked but can be more harmful than physical betting. Lockdowns have caused many to turn to online gambling, leading some into debt.	The regulation of online gambling falls outside the scope of Local Authorities and the Statement of Principles.
	Cllr 1 – Point 3	Written	Public Health and the NHS should monitor depression and other illnesses to assess any correlation with debt and gambling.	The point is accepted, but it is beyond the scope of the Statement of Principles.
	Cllr 1 – Point 4	Written	Drug and alcohol addiction can lead to gambling addiction. Promoting gambling awareness with public health and treatment services is crucial.	The point is accepted, but it is beyond the scope of the Statement of Principles.
	Cllr 1 – Point 5	Written	Betting shops and AGCs have been affected by FOBTs limits. This led to closures of betting shops and rise in AGCs. Identifying the client base for each establishment is important.	The point is accepted, but it is beyond the scope of the Statement of Principles.
	Cllr 1 – Point 6	Written	Betting shops and bingo halls can be important social spaces for some people. Is this also the case for AGCs?	Research may be needed to explore the social benefits of attendance at venues which provide bingo, betting and gaming machine low-stakes gaming. This is not information that is available at the time of redrafting the Statement of Principles.

	Cllr 1 – Point 7	Written	The maps provided showed ASB and crime data. Has there been a breakdown to show the involvement of alcohol? And what is the breakdown of ASB/ crime between Betting shops and AGCs. Are losses on machines the issue?	There is no local data to answer these questions around the involvement of alcohol in crime related incidents, comparisons between betting shops and AGCs or machine losses by premises type. However, the Brent Local Area Plan does show the location of alcohol licensed premises and operators must use this information to inform their Local Area Risk Assessments.
	Cllr 1 – Point 8	Written	Should the National Probation Service be shown separately from Brent Youth Offending Service in Schedule 6, P89?	Schedule 7 (page 93) shows the National Probation Service as separate to Youth Offending Service.
	Cllr 1 – Point 9	Written	Have Age UK and Brent Mind been consulted?	Schedule 7 (page 93) shows that Age UK and Brent Mind have been consulted.
13 October 2023	Luxury Leisure – Point 1	Written	The Authority is subject to the Regulators' Code under the Gambling Act 2005. It must support those it regulates, minimise negative economic impact, regulate compliance costs, and consider compliance records. A reference to the Code would be helpful.	Section 15 of the document discusses 'Good Practice in Regulation'. However, we noticed that the section doesn't mention the importance of minimising economic impact and reducing compliance costs. As regulators, we are committed to following the statutory principles of good regulation as outlined in the Regulators' Code. We also strive to assist those whom we regulate in complying with regulations and ensure that our actions are transparent, as it outlined within the opening paragraph of the policy. To clarify this further, we have revised the wording of Section 15.
	Luxury Leisure – Point 2	Written	Para 4.2.3 deals with the first Licensing Objective. However, it suggests that antisocial behaviour should be taken into account under this Objective. This is misplaced and recommend moving it to the third Licensing Objective due to its alleged correlation with "problematic gambling".	The point is accepted and understood. As anti-social behaviour is specifically covered within 4.2.8 (now renumbered to 4.2.7), is dealt with throughout the policy, and as concerns with the clarity of this paragraph have been raised within other responses, this paragraph has now been removed.

			We question how the provision of adequate sanitation relates to the first objective.	The point is accepted and understood. This was present within the policy before redrafting and its' purpose here is not clear. This has been removed from the relevant list.
	Luxury Leisure – Point 3	Written	There is question over the relevance of Para 5.9.3, and how it would be enforced. The Statement of Principles that applies to the application is determined by the respective authority.	<p>The paragraph that is being referred to currently reads as follows:</p> <p>'Lastly, all operators will need to take into consideration neighbouring wards and Boroughs when making a decision to apply for a new licence and/or writing/modifying risk assessments. As discussed, the provided list is not exhaustive. If other factors are identified, these should also be reflected upon in risk assessments.'</p> <p>The intention of this paragraph is to highlight that gambling premises are often situated on the border of Local Authority areas, particularly within London Boroughs. To comply with the LCCP (Licence Conditions and Codes of Practice), operators are required to assess the local risks to the licensing objectives and, as part of this, must take into account relevant matters identified in the licensing authority's Statement of Licensing Policy. It is not exclusively limited to the factors identified as part of Brent's Local Area profile and Statement of Policy.</p> <p>As the response received directly below makes clear the importance of partnerships with other Local Authorities, the paragraph has been revised to read:</p> <p>'Lastly, all operators must consider the risks to the licensing objectives that may arise from offering gambling services within their premises. This includes identifying all potential risks associated with factors present in neighbouring wards and Boroughs. Applicants are expected to consider these risks before applying for a new licence and/or modifying their existing risk assessments.'</p>

15 September 2023	Communities and Regeneration Team, Brent Council – Point 1	Written	Operators should consider neighbouring wards and boroughs while applying for a new licence or modifying risk assessments. This means that when awarding a Brent licence, we will take into account the proximity of licensed premises from neighbouring authorities. It's important to capture and safeguard against this for all neighbouring boroughs in our policy.	Please see amendment detailed directly above which makes the requirement to consider local risk arising from neighbouring boroughs clearer within Section 5.9.3.
	Communities and Regeneration Team, Brent Council – Point 2	Written	It was noticed that the interactive map is missing several Brent businesses in Kilburn.	The interactive map referred to within the response has now been updated with the missing data from Kilburn.  The amended map can be viewed here:  <a href="https://maps.brent.gov.uk/map/Aurora.svc/run?script=%5Caurora%5Caurora+-+Gambling.AuroraScript%24&amp;nocache=2097243282&amp;resize=always">https://maps.brent.gov.uk/map/Aurora.svc/run?script=%5Caurora%5Caurora+-+Gambling.AuroraScript%24&amp;nocache=2097243282&amp;resize=always</a>
11 October 2023	Merkur Group	Written	The Authority should not decide on a licensee's business model or limit their activities, except in cases where operator control measures fail. All licensees must comply with governing legislation and ensure that permitted gambling activities are socially responsible. Refusal assumptions contradict permissive licensing.	This section was not amended in the most recent policy draft from the previous Statement of Principles and, therefore, has been unchallenged so far. However, it has been recognised that the original paragraph needs modification and has been amended as follows:  “Bingo premises may only provide gaming machines for use if there are substantial facilities available for non-remote bingo, as outlined in Section 9.1.2 of the Licence Conditions and Codes of Practice.”  To avoid any potential miscommunication, the paragraph above has been written to reflect the current relevant section of the LCCP without any additional commentary.

18 October 2023	Cllr 2 – Point 1	Written	4.2.4 mentions training but not for vulnerable adults at gambling premises.	Concerns raised here will be addressed in a more appropriate section of the policy, as 4.2.4 primarily focuses on crime prevention.
	Cllr 2 – Point 2	Written	How should gambling businesses act on their commitment to protect vulnerable people? Should they provide training on vulnerability awareness?	Additional bullet point added to 4.5.3: Staff training for recognising vulnerability and risk of gambling harms.
	Cllr 2 – Point 3	Written	4.6.2 "Are these categories assessed on a list or case-by-case basis? For example, where do refugee hostels fall? Migrants are a high-risk group for gambling due to deprivation (as per Government communications)."	Emergency and supported accommodation are already included in the category of 'Hostels or other accommodation for vulnerable individuals'. This category has been updated to specifically cover emergency and supported accommodation within the Local Area Profile, hence the new phrase: 'Hostels, emergency accommodation, supported accommodation, or other accommodations for vulnerable individuals'.
	Cllr 2 – Point 4	Written	Para 5.2.2 - Can we have data that is specific to Brent? For example, the Manchester dataset that can be found at <a href="https://democracy.manchester.gov.uk/documents/s36131/Appendix%201%20Gambling%20Related%20Harms.pdf">https://democracy.manchester.gov.uk/documents/s36131/Appendix%201%20Gambling%20Related%20Harms.pdf</a>	The work mentioned was supported by the key findings of the PHE Gambling-related Harms Evidence Review and the Greater Manchester Strategic Needs Assessment on Gambling Harms. Though it would have been beneficial for Brent to conduct such an assessment, it was not available during the policy review. The PHE report has contributed to the government's current White Paper proposals, which are currently under consultation and will not be finalised until after policy implementation.
	Cllr 2 – Point 5	Written	Para 5.3.3. specifically mentions neurodiversity and low IQ – so these appear to be areas for training on awareness to avoid staff making assumptions/ stereotyping,	The latest update to section 4.5.3 provides additional guidance for vulnerability training. The definition was kept broad to cover all possible scenarios, as vulnerability is a complex and multi-faceted issue.

			understanding how to communicate with those who have a learning disability (and also respect their independence).	
	Cllr 2 – Point 6	Written	Para 7.2.3 - It is important to provide staff with training on how to work with adults with learning disabilities.	<p>This section pertains to the conditions that operators may offer during the application process. A new section, 7.2.3, has been added, which suggests a model condition for training staff to identify vulnerable individuals who may be susceptible to the harmful effects of gambling. The suggested condition is as follows:</p> <p>"All staff members must receive training on identifying those who may be vulnerable to gambling harm. Records of the training given must be retained on the premises and made available for inspection by authorised officials."</p>
	Cllr 2 – Point 7	Written	Para 8.10.2 - Can you add a definition of what a fair is, so that it doesn't limit what other cultural events can be held in parks?	Section 8.10.1 now includes the legal definition of travelling fairs. These fairs are defined as those that are wholly or primarily dedicated to providing amusements, and they are permitted to offer an unlimited number of Category D gaming machines and equal chance prize gaming without the need for authorisation from the Licensing Authority. However, such gaming facilities must be ancillary to the amusement provided by the fair.
24 October 2023	Health and Wellbeing Brent Council	Written	<p>Issues found:</p> <ul style="list-style-type: none"> <li>- 1.1.4: Need more recent income data.</li> <li>- 1.3.2: Remove repeated sentence.</li> <li>- 5.3.4: Insert cost of harms data reference on page 28.</li> </ul>	<p>The income data has been updated using ONS data available here: <a href="https://www.ons.gov.uk/help/localstatistics">https://www.ons.gov.uk/help/localstatistics</a></p> <p>The repeated sentence has been removed.</p> <p>The reference for this data has now been inserted on page 28:  <a href="https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--">https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--</a></p>



				in place where there are specific issues relating to the licensing objectives.
	Cllr 3	Online	The issue of gambling needs to be addressed as a public health concern, and its regulation should be transferred to the public health department. We should make a greater effort to utilise the insights gained from the Brent Poverty Commission to restrict the presence of gambling establishments in areas with a high level of deprivation.	<p>Noted but no policy revision required.</p> <p>The Local Area Profile takes deprivation into consideration and considers it within the policy. If an area is already facing high deprivation, any application would be evaluated based on its own merit and any risks posed to the Licensing Objectives.</p> <p>Several consultation responses have emphasised the need for a local strategy to tackle gambling-related harms. This has emerged as a theme in the consultation process.</p> <p>Unfortunately, there are limited opportunities to make amendments to the policy, based on this aspect, currently.</p>
	Cllr 3		We prevent fast food establishments near schools, why not do the same for gambling establishments?	<p>Noted but no policy revision required.</p> <p>The Local Area Plan identifies the placement of schools, which gambling operators should consider when conducting their Local Area Risk Assessment. In areas where children are particularly vulnerable, the impact on the licensing objective of protecting children from harm would determine whether a new application is granted and if it aligns with the licensing objectives.</p>
	Cllr 3		It is suggested to grant the police a more prominent role in the planning and licensing process.	<p>Noted but no policy revision required.</p> <p>As responsible authorities under gambling legislation, the police were consulted in the creation of this revised policy.</p>
	Cllr 3		Are we using the Index of Multiple Deprivation to prevent gambling establishments from operating in	Noted but no policy revision required.

			areas where the most vulnerable populations reside?	The Local Area Profile references the index of deprivation as a key companion document within the Statement of Policy.
	Cllr 3		Have the adjacent shops been surveyed to determine whether the gambling establishments are causing any related problems?	Noted but no policy revision required.  As part of the broader consultation process, local businesses were consulted.
10 October 2023	Resident 1 - Alperton	Online	The council should consider stopping the issuance of gambling licenses due to the social problems associated with it.	Noted but no policy revision required.  The response is noted but lacks a clear definition of the related social problems referenced.
19 September 2023	Resident 2 – Queens Park	Online	The measures taken are inadequate in ensuring the safety of people who are vulnerable.	Noted but no policy revision required.  A number of revisions have been made to the policy regarding the protection of vulnerable people. To make further changes, it would be useful to have specific details/ examples of what could be implemented to better protect vulnerable people.
	Resident 2 – Queens Park	Online	Not easy to navigate.	Noted but no policy revision required.  This is unfortunate, but further detail would be required to support policy revisions.  A table of contents has been added into the policy during this revision to aide navigation.
	Resident 2 – Queens Park	Online	It is necessary to take further action to address the issue of antisocial behaviour occurring outside betting shops.	Noted but no policy revision required.  This issue has been raised throughout the consultation process and engagement exercises. Further clarification has been added regarding operator responsibilities in recognising and mitigating the risks of crime associated with gambling premises.

	Resident 2 – Queens Park	Online	There is still much that needs to be done. It is unsettling to walk past these premises.	<p>Noted but no policy revision required.</p> <p>There has been an increased emphasis on ensuring that operators are responsive to crime and disorder issues related to their premises within the policy revision.</p>
	Resident 2 – Queens Park	Online	Betting shops use mosquito devices that emit high-frequency sounds to disperse younger people. A shop in Kensal Rise has this on the high street. Should it be illegal?	<p>Noted but no policy revision required.</p> <p>The policy does not require the installation of such devices, and it does not suggest that such devices would be effective in mitigating risk. Any devices that are installed must comply with relevant laws.</p>
11 September 2023	Resident 3 - Cricklewood and Mapesbury	Online	I don't feel safe walking with my baby due to the high number of gambling shops on Shoot Up Hill and the dodgy people in surrounding areas. The policy doesn't seem to prioritise protecting the vulnerable.	<p>Noted but no policy revision required.</p> <p>Greater focus has been placed on ensuring that operators are responsive to issues of crime and disorder related to their premises.</p>
	Resident 3 - Cricklewood and Mapesbury	Online	I don't understand how having so many gambling spots in Kilburn/Cricklewood contributes to the community's culture and wellness.	<p>Noted but no policy revision required.</p> <p>The policy refers to the Borough Plan's objectives but culture and wellness are not specifically part of the policy aims.</p>
	Resident 3 - Cricklewood and Mapesbury	Online	I don't believe that the current number of gambling businesses in Brent is sufficient to prevent harm to children.	<p>Noted but no policy revision required.</p> <p>The White Paper proposes introducing Cumulative Impact Zones, which could provide an opportunity to investigate whether there is evidence to support limitations on the issuance of new gambling premises licenses.</p>
	Resident 3 - Cricklewood	Online	The number of shops should be strongly reduced.	Noted but no policy revision required.

	and Mapesbury			
	Resident 3 - Cricklewood and Mapesbury	Online	Fast food chains near gambling spots should be reconsidered.	Noted but no policy revision required.  Another response has raised concerns regarding the proximity of gambling premises to fast food outlets where children tend to gather. To address this issue, it is recommended that gambling operators include the location of establishments that attract children and young people as a risk factor in their Local Area Risk Assessments, as outlined in Section 4.6.2.
11 September 2023	Resident 4 - Sudbury	Online	The policy fails to balance protection for vulnerable residents and community support. Wembley Central has ten gambling shops on the High Road, 5 meters apart. This is unhealthy and unacceptable.	Noted but no policy revision required.
	Resident 4 - Sudbury	Online	The policy is easy to navigate.	Noted but no policy revision required.
	Resident 4 - Sudbury	Online	The policy is ineffective in preventing gambling, as money seems to be the top priority.	Noted but no policy revision required.  The Statement of Principles aims to permit gambling consistent with licensing objectives, not prevent it.
	Resident 4 - Sudbury	Online	Gambling is unfair for vulnerable individuals. Limiting the number of shops on main roads could help address this issue.	Noted but no policy revision required.  As mentioned in other parts of this report, the policy cannot decrease the number of gambling establishments.
	Resident 4 - Sudbury	Online	If you open a gambling premises near a fast-food restaurant, you are not protecting children.	Noted but no policy revision required.
	Resident 4 - Sudbury	Online	In Brent there's also a problem with spitting on the floor.	Noted but no policy revision required.

				The policy would not be able to address these specific concerns.
	Resident 4 - Sudbury	Online	Additional rules and on-the-ground police officers are needed to address the issue of fly tipping, which is a big problem in Brent. CCTV cameras have also been installed to help combat this issue.	<p>Noted but no policy revision required.</p> <p>The policy would not be able to address these specific concerns.</p>
	Resident 4 - Sudbury	Online	There is not enough data and the policy does not reach the right amount of people.	<p>Noted but no policy revision required.</p> <p>There have been other responses which suggest that there is a lack of locally available data and so this feedback will be used when evaluating the responses.</p>
	Resident 4 - Sudbury	Online	There is a definition of vulnerability but no action taken to actually protect the vulnerable.	<p>Noted but no policy revision required.</p> <p>The policy has been amended to explicitly state that Brent Council expects operators to train their staff on protecting vulnerable individuals and to implement policies that facilitate the identification of those who may be experiencing gambling-related harm.</p>
	Resident 4 - Sudbury	Online	Stop opening shops in Brent.	<p>Noted but no policy revision required.</p> <p>As referenced elsewhere within this report, the policy would not be able to issue restrictions on issuing new gambling premises, but sets out that we will consider the impact of each application on a case by case basis.</p>
	Resident 4 - Sudbury	Online	The Local Area Plan is hard to read for most people.	<p>Noted but no policy revision required.</p> <p>This comment will be used to explore improvements to the presentation of data.</p>

	Resident 4 - Sudbury	Online	There should be no gambling premises near shops, nurseries, restaurants or places where teenagers congregate.	<p>Noted but no policy revision required.</p> <p>The Local Area Plan identifies areas which are considered of higher vulnerability in terms of the proximity to locations where children and young people would be expected to congregate. Where the risk of harm is very high, operators would have to demonstrate that they have put policies into place to address these risks.</p>
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