

Appendix B

Responses to Coventry City Council Statement of Gambling Policy Consultation

9th August 2024 – 20th September 2024

1. Background

- 1.1 The public consultation on the draft Statement of Gambling Policy took place for 6 weeks from 9th August 2024 – 20th September 2024.
- 1.2 The consultation was extensive and included a range of statutory consultees, stakeholders and local communities.
- 1.3 Three responses were received during the consultation period.
- 1.4 All consultees were asked for comments on the draft policy, which have been organised into themes and are presented below.

Respondent	Feedback/Comments/Amendments	Action
Luxury Leisure & Talarius Ltd	<p>Dear Team</p> <p>Gambling Act 2005 - Statement of Principles Consultation</p> <p>Thank you for the opportunity to make comments in relation to the above consultation. On behalf of Luxury Leisure and Talarius Ltd, we make the following points in relation to the consultation draft ('the Draft'):-</p> <ol style="list-style-type: none"> 1. As the Authority will appreciate, in matters of regulation under the Gambling Act 2005 (the Act) it is subject to the Regulators' Code. That code imposes a number of obligations on the Authority, including one that it should carry out its activities in a way that it supports those it regulates to comply and grow. Additionally under the Code, when designing and reviewing policies, the Authority must under other things understand and minimise the negative economic impact of its regulatory activities and regulate and minimise the costs of compliance of those it regulates. Further, the Authority should take an evidence-based approach in determining priority risks and recognise the compliance record of those it regulates. We cannot see reference to the Code and suggest that the Draft be amended to include a reference to it as outlined. 2. While other types of premises licences and permits are dealt with at paras 15 - 26, we cannot see mention of Adult Gaming Centres and suggest that is included. 3. We cannot see reference to the availability of provisional statements and suggest that it is also included, noting of course that it is an optional process for applicants (not compulsory) when premises have yet to be fully constructed or finished. 	<p>Noted and Policy amended- Included in Paragraph 30.2 and 30.4.</p> <p>Noted and Policy amended – Added Paragraph 19.</p> <p>Noted and Policy amended – added Paragraph 11.</p>

	<p>We hope that you find the above few points helpful and would be happy to talk through any of the points of answer any questions you might have</p>	
<p>Coventry Quakers</p>	<p><u>Statement on Gambling Licensing for Coventry City Council from Coventry Quakers</u> Dear Licensing Team at Coventry City Council, The following is a contribution from Coventry Quakers outlining our spiritual response to, and hopes for action to curb, the harms and risks inherent in gambling. We do not have capacity to respond in a detailed way to all specified sections of the gambling licensing policy but wish to give an overview of our general position and some policy suggestions in light of this. We trust that you will implement local licensing for gambling in ways that aim to minimise the social and individual harms it poses, whilst fulfilling your responsibilities under the Gambling Act 2005, legislation which sadly seemed to usher in more deregulation and make it harder for Local Authorities to refuse new licenses for gambling businesses. We hope you will do everything within your power to prevent the growth of ‘problem-gambling.’ As we see it, gambling can refer, but is not limited to, gaming, betting and lottery and includes such things as raffles, scratchcards and competitions. Quakers’ objection to gambling stems from how it:</p> <ul style="list-style-type: none"> • Confers gain at the expense of another’s loss. • Works against equality and spiritual connectedness to others. • Encourages an unsatisfying stress on material wealth. <p>QAAD (Quaker Action on Alcohol and Drugs) which also considers gambling, submitted written evidence to the Culture, Media and Sport Committee assessing the impact of the Gambling Act 2005 and these three points above were taken from Paragraph Two of the</p>	<p>Noted but no action required for the Policy – Already addressed in paragraph 7 and paragraph 2.2.</p> <p>Matters raised are addressed by Gambling Commissions Licensing Conditions and Codes of Practice which Licensing Authorities must have regard to when</p>

	<p>Introduction (before 1. Foreword and Executive Summary). The submission makes multiple valid points with which Coventry Quakers are in sympathy and recommended actions we agree with and would like to see implemented. https://publications.parliament.uk/pa/cm201213/cmselect/cmcomeds/421/421we15.htm accessed 13/09/2024</p> <p>Quakers' Advices and Queries No. 39 states, "Consider which of the ways to happiness offered by society are truly fulfilling and which are potentially corrupting and destructive. Be discriminating when choosing means of entertainment and information. <i>Resist the desire to acquire possessions or income through unethical investment, speculation or games of chance.</i>" (italics added for emphasis) https://qfp.quaker.org.uk/passage/1-02/ accessed 13/09/2024</p> <p>Individual Quakers and informal discussions among Friends have highlighted how gambling encourages a fantasy mindset of 'getting something for nothing' (when one hears the odds are more in favour of someone being stung to death by wasps than winning the lottery). It pushes hopes of a lavish, leisurely lifestyle upon often disadvantaged and working-class people -who are simply desperate to escape insecurity, poverty and overwork. It is a misallocation of resources which enriches a minority of profiteers in the gambling industry, in a society in which simultaneously many people's basic needs go unmet, and it could be characterised as a tax on those lacking education in statistics and probability.</p> <p>Considering this, outside of the licensing policy purview we would urge you to go further in exercising any powers at your disposal as a Local Authority to:</p> <ul style="list-style-type: none"> • Prohibit the advertising of gambling locally on billboards, bus-stops or similar, or if it cannot be prohibited entirely within the wording of current laws, be as discerning as possible as to the location of advertising and gambling premises within the city, particularly in areas that are considered deprived using the standard indices of multiple deprivation. • Introduce discussion of gambling as a social issue and the dangers of addiction within the PSHE curriculum for young people in school. • Increase support for those experiencing gambling addiction and their families. 	<p>determining applications and are also conditions of Operating Licences issued by the Gambling Commission.</p>
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- Commission local research in Coventry or otherwise access the research of others/disaggregated national research into the prevalence of gambling addiction and problem gambling to have accurate data in this regard, if not already available.
- Consider the relative power and wealth of gambling companies responding to this consultation. Individual capital and shareholders who benefit financially from the industry are not likely to be residents of Coventry. We hope you will more readily listen to and amplify the voices and needs of ordinary local residents and communities when weighing responses and assessing how to proceed.

Thank you for your time and work on responses to this consultation

<p>Public Health</p>	<p>Section 7 - We would like to see a reference to gambling harm and harm reduction measures in this part of the policy. We would like to ensure that premises are displaying signposting to support for problem and safer gambling in their premises. The West Midlands Gambling Harms Clinic supports people affected by problem gambling in the Midlands. We can facilitate an introduction with them. Real-time surveillance data of suspected suicides for Coventry and Warwickshire has identified individuals are at greater risk of suicide immediately after losing large sums of money in gambling venues. Would it be possible for staff to be trained in suicide intervention for when a person appears in immediate distress? Free training is available. Additionally, it would be good if venues could have signposting to suicide support for people who have reached crisis point or may be experiencing distress. We would like to see included within the considerations a reference to the number of alcohol licensed premises near to the potential gambling premises as part of the application, to help strengthen the protection of people who may be unable to make informed or balanced decisions due to alcohol use. We would like to see the applicant provide mitigations proportionate to their proximity to these locations. If a premises is serving alcohol, this also needs to be considered.</p> <p>Section 9 – Location If possible, we would like to see 9.3 be mandatory (but not exhaustive) wherever the premises is located. These are important factors that all gambling premises need to consider to keep vulnerable people, and people at risk of problem gambling safe. We would also like to see proximity to alcohol licensed premises included in the considerations, and proportionate mitigations provided by the premises.</p>	<p>Noted but no change to the Policy. Already addressed in Para 2.2.</p> <p>Gambling premises must adhere to social responsibility codes in accordance with their Operators Licences issued by the Gambling Commission. We can work in partnership with Public Health at a local level to raise awareness and provide training.</p> <p>Noted but no change to the Policy Applications are considered on a case-by-case basis. The sensitive premises in the local area will differ according to the location</p>
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		<p>of each individual premises. The requirement for a Local Area Risk Assessment (LARA) is mandatory. Representations can be made within the 28 days if the LARA is not considered to be sufficient. The location of alcohol premises in each area may be too onerous and some Gambling premises can hold their own alcohol licences and the management of these will be subject to Licensing Act 2003 and Licensing Policy requirements.</p>
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