Number	Consultation Response	Officer Comment
1	In view of the evidence of harm to our society and its association	Noted
	with other damaging behaviours, both to individuals and society, we	
	should not permit ANY additional gambling without our district.	
	Gambling is solely permitted for the personal gain of a few people at	
	the expense of so many others. It is so harmful in so many ways.	
	Let's work to make our society better, step by step, NOT worse	
2	Gambling sponsorship should be completely banned. Online	Outside the scope of a local Gambling Policy
	gambling should be completely banned. Betting shops should be	
	few and far between.	
3	Consultation on the review and update of the Rushcliffe Borough	
	Council Gambling Policy (Statement of Licensing Principles)	
	We would like to thank the Council for the opportunity to review this	
	document. As was stated in Labour's 2024 general election	
	manifesto, the government is "committed to reducing gambling-	
	related harm" and it is important that national and central	
	government work together to this end.	
	This consultation is an integral year of regularly regioning Ducksliffs	
	This consultation is an integral part of regularly reviewing Rushcliffe Borough Council's role as a statutory Licensing Authority, and we	
	hope that the consultation process will ultimately strengthen	
	delivery of the policy's proposed aims.	
	delivery of the policy's proposed airris.	
	**	
	2:10	2:10
	It is noted that in this section at present, there is no reference to	We have no objection to the insertion of this comment in 2:10 if
	information exchange with third parties such as a constable or police	this aids clarity in legally sharing information with " a constable or
	force, an enforcement officer, another licensing authority or His	police force, an enforcement officer, another licensing authority
	Majesty's Commissioners of Customs and Excise. Other authorities	or His Majesty's Commissioners of Customs and Excise". But this
	have clarified that information exchange may take place with the	comment repeats what is stated in legislation which officers are

third parties listed at the start of Schedule 6. For example, by using the phrase:

"The Gambling Act also allows the exchange of information with persons or bodies for them to exercise their functions under the Act which are listed in Schedule 6 (1)".

We suggest that the Council considers updating its policy to reflect broader sharing of data to support the implementation of the Gambling Act 2005.

\*\*

# 2:11

Promoting equality and diversity across the borough is important. It is noted in this policy, and this is welcomed.

However, other authorities' policies go further and provide a more rounded statement which, on the surface, strengthens its commitment to these principles. For example:

"Broxtowe Borough Council is committed to promoting equal opportunities, valuing diversity and tackling social exclusion. The Council will aim to provide opportunities that meet the diverse needs of different people and groups of people by ensuring that services and employment opportunities are accessible to all. Everyone will be treated fairly and with respect. Diverse needs will be understood and valued. The Council will aim to eradicate all forms of discrimination."

We suggest that the Council considers updating its wording in the policy to demonstrate how it is truly "ensuring that diversity issues are at the heart of our policy making and our service delivery", as

aware of and would follow.

2:11

An equality impact assessment has been undertaken. Also the council published separate statements at <a href="Equalities Scheme">Equalities Scheme</a>
<a href="2021-25">2021-25</a> - Rushcliffe Borough Council</a> and <a href="Equality and Diversity-Rushcliffe Borough Council">Equality and Diversity-Rushcliffe Borough Council</a> on our website and as such no specific further comment is required within the Gambling Policy. Officers have no objection if however the committee sees appropriate to insert.

stated.

We also note that the text in the current policy refers to a <u>Corporate</u> Equality Scheme. This is not the same term as <u>Equalities Scheme</u> which is used on the current Council website. We suggest that the text is updated accordingly.

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#### 5:12

To fulfil the licensing objective of "Protecting children and other vulnerable persons from being harmed or exploited by gambling", we believe it is important that children are protected from targeted advertising. The below may, therefore, be a helpful addition to the "Protection of children and other vulnerable persons" section of the policy (p.19 onwards):

"The Authority will seek to limit the advertising for premises so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children."

\*\*

## 5.13

Building on the above, to further protect children and other vulnerable persons from gambling, section 5.13 could be expanded to include further examples of safeguards. For example:

**CCTV** 

Clear notices / signage

Clear policies that outline the steps to be taken to protect children

## 5:12

The policy relates to premises regulated by this authority and not online gambling so can only relate to advertising in the place licenced. The current policy is clear that gambling is adult only and gambling should not be aimed at children and this is clear in guidance, however officers have no objection to the inclusion of this statement for clarity if required. see <a href="Young people in marketing material">Young people in marketing material</a> (gamblingcommission.gov.uk) which we will have regard to.

#### 5:13

The current list is of few examples, the list is not intended to be exhaustive to do so would limit measures. If the committee feels further examples are needed to be added this can be done. But superfluously adding more will just increase the policy with little purpose.

from harm

Proof of age schemes

Provision of information leaflets / helpline numbers for organisations such as  $\mbox{\sc GamCare}$ 

Self-barring schemes

Specified / restricted opening hours

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Thank you for the opportunity to contribute to this consultation. We hope that these contributions help to strengthen the document and, as a result, help to fulfil the core objectives outlined as part of the Gambling Act 2005:

"Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime; Ensuring that gambling is conducted in a fair and open way; and Protecting children and other vulnerable persons from being harmed or exploited by gambling."

27 August 2024