

**Schedule of Amendments and Responses to draft Gambling Policy 2022-2025**  
**Appendix 1**

Correspondence received	Respondent	Comments	Action taken/comments
12/08/21	Senior Licensing & Compliance Officer	Updated Guidance issued to Licensing Authorities checked and draft policy updated accordingly in red text. This together with expanded explanations of different gambling functions where appropriate to make the policy more user friendly	Review and accept amendments
12/08/21	Senior Licensing & Compliance Officer	All information in appendices 1 and 2 checked and updated accordingly.	No action required
Email rec'd 16/08/21	Cumbria Constabulary	No issues and nothing to add to the policy	No action required
Email rec'd 15/11/21	James Dixon Information, Governance & Data Protection Officer	The Council recognises its obligations when processing Personal Data under the UK's Data Protection regime, namely the UK GDPR and the Data Protection Act 2018. Where information considered personally identifiable is to be shared as part of this processing, the Council will seek to adopt practices pursuant to its own policies and procedures regarding data sharing. For further information including the Council's approach to Data Protection and how individuals may exercise their rights, consult the information published through the Council's <a href="#">website</a> .	To replace paragraph 6.4

<p><b>Email rec'd 19/08/21</b></p>	<p>Alex Fitzgerald – Policy Manager (ABC)</p>	<p>As a Public Authority, the Council is subject to the Freedom of Information Act 2000 (FOIA). Applications for information regarding the Council's policies and procedures will be considered in accordance with FOIA to ensure suitability of disclosure.</p> <p>The <a href="#">Cumbria Intelligence Observatory</a> has a wealth of detailed information broken down by geographical area and by theme. The Observatory website contains useful summaries on a wide range of topics such as population, economy, health, housing, poverty and deprivation. This information should all be relevant in devising a local risk assessment.</p>	<p>To replace paragraph 9.7. Remove reference to the 'About Allerdale' document as links no longer work and the relevant information is contained within the Cumbria Intelligence Observatory</p>
<p><b>Email letter rec'd 23/09/21 (see appendix 3)</b></p>	<p>Gosschalks Solicitors on behalf of the Betting and Gaming Council</p>	<p>The only comment we have relates to section 9, which is headed "Local Risk Assessments." Paragraph 9.8 contains a list of matters that the licensing authority recommends are considered by operators when conducting risk assessments. This list should be redrafted to delete matters that are not relevant to any assessment of risk to the licensing objectives.</p> <p>Social Responsibility 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 examples of matters that the licensing authority recommends be considered needs</p>	

		<p>therefore only to reflect matters that are relevant to the licensing objectives.</p> <p>It is impossible to see how issues such as <i>“youths participating in anti-social behaviour including such activities as graffiti/tagging, underage drinking etc”</i> could pose a risk to the licensing objectives.</p> <p>Similarly, <i>“gaming trends that may mirror days for financial payments such as pay days or benefit payments”</i> 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 is not relevant to the licensing objectives should be removed.</p> <p>The list of examples also suggests that “matters of faith” are relevant. Whilst it is correct that premises such as religious buildings that attract large numbers of people and which may cater for those who are vulnerable will be relevant, an individual’s beliefs cannot be relevant to any assessment of risk to the licensing objectives. The same paragraph is clear that moral reasons are not relevant (reiterated in paragraph 11.30) and this paragraph should therefore be redrafted to exclude “matters of faith” as potentially relevant.</p>	<p>Agreed – remove example  <b>Reason</b> – not relevant to licensing objectives</p> <p>Agreed – remove example  <b>Reason</b> – not relevant to licensing objectives</p> <p>Agreed – Redraft example and combine paragraphs 1 and 5 under the heading at para 9.8 <b>Other issues that may be considered could include</b> to read as follows:  Proximity of the gambling premises to all existing and new venues including places of worship which may attract or offer facilities for vulnerable groups or members of the community. Examples of which may include additional homeless hostels or gambling or mental health care/support facilities in the local area.</p>
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			<b>Reason</b> – matters of faith not relevant to licensing objectives.
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18.11.21