## STATEMENT OF PRINCIPLES GAMBLING ACT 2005 – RESPONSE GRID

Respondent	Paragraph	Comment made	Response from Council
GamCare	Whole document	<ul> <li>We welcome the position Swale Borough Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles.</li> <li>Local authorities can play a greater role in reducing gambling harm, particularly for those of our clients who experience harm in land-based gambling venues, due to council's licensing responsibilities.</li> <li>It is vital that Swale Borough Council develops a local picture of the level of gambling harms, in order to best target resources and tailor service provision. This could be achieved by gathering data from the National Gambling Helpline, as well as those already providing services in the area.</li> <li>Building on the proactive approach the council is already taking, we would like to see Swale Borough Council commit in its statement of principles to a public health approach to gambling.</li> <li>This commitment should include training frontline and primary care staff to recognise the signs of gambling harm and develop referral pathways to the National Gambling Helpline or local treatment providers. GamCare has worked with Haringey Council to implement a similar system, that has received widespread support.</li> <li>In the absence of Cumulative Impact Assessments as a method by which the "aim to permit" approach can be challenged, Swale Borough Council should continue to pursue a Local Area Profile approach that specifically analyses gambling risk, and</li> </ul>	We welcome these comments but note that the suggestions go beyond the reason for the consultation, which is limited to the contents of the Statement of Principles alone.  If and when it is possible for other departments within the council who focus on public health and harms to focus on gambling related problems, then the licensing team will play as an active a part as it can.  We will continue to build upon our Local Area Profile which is contained within the Statement of Principles.  We are aware that the Statement of Principles is likely to have to be reviewed again before the expiry of the statutory 3-year period, to take into account the anticipated Gambling Act review and have made Members aware of this.

use this data as a basis from which to scrutinise and possibly oppose a licensing application.  • The changes to Swale Borough Council's statement of principles should be viewed in the context of the Gambling Act Review and subsequent process of white paper consultations, so take account of the rapidly changing regulatory environment.	No changes to the Statement of Principles are necessary in the light of these comments.
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