

## APPENDIX 3 – CONSULTATION RESPONSE TO THE STATEMENT OF GAMBLING POLICY 2022-2025

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As you know, under the relevant legislation, gambling is ‘co-regulated’ by the Gambling Commission and by local authorities, who have the local knowledge that enables them to consider and enforce licensing. So most of this document is pretty standard and has not changed.

As can be seen, the only significant change is in section 15 with the addition of the public health section – as a result of work done by the Commission (advised by the then RGSB), this issue is now seen as increasingly important in the issuing and management of licences.

In this draft document, however, this new section is very strangely worded, and looks like it is boilerplate text that has been thoughtlessly inserted into the text (for example, if you look at West Norfolk’s updated statement it includes similar text in its section 16). This is something that should be commented on, not only because it is weird that a doc by NNDC says (for example) in 15.3 ‘We will support the local authority ...’ – they *are* the local authority; it should say something like: NNDC welcomes the support of Norfolk County Council Public Health in tackling gambling alongside other public health issues...’ – i.e., they need to express it properly so it makes sense in the context of the document.

But, more significantly, the fact that they have added this text without proper thought indicates a lack of commitment to a public health approach to gambling, which is so important. They need to write their policy *in their own words*, explaining the implications of a new focus on gambling licensing that includes a public health approach for North Norfolk.

Such an explanation might include the following two points:

1. That ‘destination gambling’ – e.g., gambling that people do when they are on holiday, is potentially less harmful than regular gambling. That is, e.g., a tourist ‘having a flutter’ at a seaside resort such as Wells is potentially less problematic than a local punter betting regularly in a Fakenham betting shop. Thus, regulation that takes account of public health might give more attention to controlling licences in less-touristy locations.
2. On the other hand, there is some evidence that children living in seaside towns which often have ‘family entertainment centres’ (which children are allowed to enter and gamble on category D machines) are more at risk of gambling and, potentially, of gambling problematically. So a public health approach might lead the Council to focus more on the protection of children and young people in these locations. This could be a particular issue with the licensing requirement that there

should be a clear physical separation between these premises – which under-18s are allowed to enter – and the over-18 areas from which they should be excluded – a regulatory requirement that is not always well-observed.

These are just two examples of how a public health approach might operate in practice – not necessarily points to be included in the policy. But what the policy *does* require is some evidence that officers have properly thought through the implications of the public health approach and, in this updated policy document, properly expressed this in words relevant to the NNDC area.

Additional evidence that they haven't treated it as a proper policy development exercise, but are just 'going through the motions' is that the title of their file is 'LAcours Statement of Principle Template'! (LACoRS is the 'Local Authorities Coordinators of Regulatory Services', that is, a national body that assists local authorities with regulation) – this is probably where they got the boilerplate text from, and they've not even bothered to rename the file!