

## Kim Tuckey

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**From:** Denise Bastick  
**Sent:** 29 January 2020 09:40  
**To:** Kim Tuckey  
**Subject:** FW: Consultation on Statement of Principles Under The Gambling Act 2005 [#44B9AC]

Denise Bastick  
Licensing Compliance Officer  
Commercial and Regulatory Service Directorate  
[dbastick@eppingforestdc.gov.uk](mailto:dbastick@eppingforestdc.gov.uk)  
Tel: 01992 564334  
Working hours Wednesday – Friday

Please contact Mrs Handan Ibrahim, Licensing Compliance Officer  
[hibrahim@eppingforestdc.gov.uk](mailto:hibrahim@eppingforestdc.gov.uk) Tel: 01992 564153  
Monday – Wednesday

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**From:** Charlotte Meller [REDACTED]  
**Sent:** 27 January 2020 10:43  
**To:** Denise Bastick  
**Subject:** FW: Consultation on Statement of Principles Under The Gambling Act 2005 [#44B9AC]

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Hi Denise  
Thanks for sharing this with GC, I have had a quick read, mainly looking at the points that you have highlighted as amended and can offer some informal observations for your consideration  
Thanks Charlotte

Credit (page 16) - there is a mandatory condition on location of ATMs via S177 of the Act ( see [para 9.12 of GLA](#))

Bingo (page 17) think that is referencing an earlier version of the GLA – probably worth looking at [para 18.8 of GLA](#) which covers the machine allowances pre 2011 and then the changes that have been in force since 2011

FOBTs (page 17) – possibly some words missing in the 2<sup>nd</sup> sentence (do you mean the LA will give consideration to apply....where it has evidence based concerns?)

Betting machines (Page 18) think ref to section 6 of GLA is an old version of the GLA – as the current GLA section 6 is about statement of policy ? ( may be worth checking if you have other refs to GLA sections in your policy that you are citing the latest text etc)

Responsible Authorities – HMRC new details (page 28)

HM Revenue and Customs  
Excise Processing Teams  
Gambling Duties

[dbastick@eppingforestdc.gov.uk](mailto:dbastick@eppingforestdc.gov.uk)

Tel: 01992 564334

**Working hours Wednesday – Friday**

Please contact Mrs Handan Ibrahim, Licensing Compliance Officer

[hibrahim@eppingforestdc.gov.uk](mailto:hibrahim@eppingforestdc.gov.uk) Tel: 01992 564153

**Monday – Wednesday**



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## Kim Tuckey

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**From:** Denise Bastick  
**Sent:** 19 February 2020 10:17  
**To:** Kim Tuckey  
**Subject:** FW: Consultation on Statement of Principles Under The Gambling Act 2005  
**Attachments:** GamCare Local Authorities Brochure 2019 (square-web) Updated.pdf; Industry Services Brochure 2019 web.pdf

This response is more general

Sent with BlackBerry Work (www.blackberry.com)

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**From:** Catherine Sweet <[REDACTED]>  
**Sent:** 24 Jan 2020 16:44  
**To:** Denise Bastick <dbastick@eppingforestdc.gov.uk>  
**Cc:** licensing@eppingforest.gov.uk  
**Subject:** RE: Consultation on Statement of Principles Under The Gambling Act 2005

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Hello,

Thank you for your email, we appreciate your interest in our work.

While we do not have the resources available to allow us to personally respond to each Local Authority which contacts us regarding their refreshed Statement of Principles, we have compiled a list of the issues or factors which we think it would be helpful to consider below, more information is available via the [Gambling Commission](#).

The function of the Statement is to reflect locally specific gambling concerns and to reflect the Council's wider strategic objectives. The active use of the Statement is one means by which you can make clear your expectations of gambling operators who have premises in your area. This allows operators to respond to locally specific requirements and adjust their own policies and procedures as required.

- A helpful first step is to develop a risk map of your local area so that you are aware of both potential and actual risks around gambling venues. A useful explanation of area-based risk-mapping has been developed with Westminster and Manchester City Councils, which gives some guidance on those who may be most vulnerable or at-risk of gambling-related harm. For more information please see [www.geofutures.com/research-2/gambling-related-harm-how-local-space-shapes-our-understanding-of-risk/](http://www.geofutures.com/research-2/gambling-related-harm-how-local-space-shapes-our-understanding-of-risk/)
- Consider that proposals for new gambling premises which are near hostels or other accommodation or centres catering for vulnerable people, including those with learning difficulties, and those with gambling / alcohol / drug abuse problems, as likely to adversely affect the licensing objectives set out by the Gambling Commission. This is also relevant regarding the proximity to schools, colleges and universities.
- A detailed local risk assessment at each gambling venue – pertinent to the environment immediately surrounding the premises as well as the wider local area – is a good way to gauge whether the operator and staff teams are fully aware of the challenges present in the local area and can help reassure the Local Licensing Authority that appropriate mitigations are in place.

- Does the operator have a specific training programme for staff to ensure that they are able to identify children and other vulnerable people, and take appropriate action to ensure they are not able to access the premises or are supported appropriately?
- Does the operator ensure that there is an adequate number of staff and managers are on the premises at key points throughout the day? This may be particularly relevant for premises situated nearby schools / colleges / universities, and/or pubs, bars and clubs.
- Consider whether the layout, lighting and fitting out of the premises have been designed so as not to attract children and other vulnerable persons who might be harmed or exploited by gambling.
- Consider whether any promotional material associated with the premises could encourage the use of the premises by children or young people if they are not legally allowed to do so.

We would suggest that the Local Licensing Authority primarily consider applications from operators who have achieved our Safer Gambling Standard.

If you would like more information on how our audit can support Local Licensing Authorities, please contact

For more information on GamCare training and other services available to local authorities, as well as recommended training for gambling operators, please see the attached brochures.

If there is anything else we can assist with please do let us know.

Kind regards,  
Catherine

**Catherine Sweet**  
Head of Marketing and Communications

T:  
E:



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**From:** Info [REDACTED]  
**Sent:** 24 January 2020 15:22  
**To:** Catherine Sweet [REDACTED]  
**Subject:** FW: Consultation on Statement of Principles Under The Gambling Act 2005

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**From:** Denise Bastick <[dbastick@eppingforestdc.gov.uk](mailto:dbastick@eppingforestdc.gov.uk)>  
**Sent:** 23 January 2020 16:20  
**To:** Info [REDACTED]  
**Subject:** Consultation on Statement of Principles Under The Gambling Act 2005

This Message originated outside your organization.

[REDACTED]

Email [REDACTED]

Telephone [REDACTED]

Charlotte Meller

[REDACTED]

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**From:** Gambling Commission [REDACTED]

**Sent:** Friday, January 24, 2020 7:14 AM

**To:** Rob Burkitt [REDACTED]

**Subject:** FW: Consultation on Statement of Principles Under The Gambling Act 2005 [#44B9AC]

-----Original Message-----

**From:** [dbastick@eppingforestdc.gov.uk](mailto:dbastick@eppingforestdc.gov.uk)

**Sent:** 23 January 2020 14:46:22

[REDACTED]

**Subject:** Consultation on Statement of Principles Under The Gambling Act 2005

Good afternoon

Please find attached this Authority's draft consultation for the Gambling Act Policy. Please send any comments no later than 19<sup>th</sup> February 2020.

Kind regards.

Denise Bastick

Licensing Compliance Officer

Commercial and Regulatory Service Directorate

**Kim Tuckey**

---

**From:** Debbie Houghton  
**Sent:** 18 February 2020 14:56  
**To:** Kim Tuckey  
**Subject:** FW: Draft Statement of Licensing Policy consultation

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,  
Commercial and Regulatory Directorate  
Tel: 01992 564336  
E-mail: dhoughton@eppingforestdc.gov.uk*

---

**From:** Brian Minihane [REDACTED]  
**Sent:** 17 February 2020 13:51  
**To:** Licensing  
**Subject:** Draft Statement of Licensing Policy consultation

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Good afternoon,

Further to your consultation in relation to the Statement of Principles under the Gambling Act 2005, I have reviewed the draft policy and would ask you to consider just one small point, as follows.

Within the Betting Premises category on Page 17, the following statement is provided:

**Fixed Odds Betting Terminals (FOBT's)**

**In respect to nationally expressed concerns that exist in relation to the potentially adverse impact FOBT's may have on vulnerable groups of adults, The Licensing Authority will give apply conditions to betting shop premises licences including, but not limited to, setting out minimum staffing levels to ensure sufficient staff are on the premises to comprehensively promote responsible gambling, adequately protect players, particularly in relation to those who are deemed to be vulnerable and to prevent under 18 year olds accessing gambling facilities.**

I would recommend a very minor alteration to this text. The sentence reads "The Licensing Authority will give apply conditions", which already contains an error in the grammar, so is probably being altered anyway. I would suggest that this is changed to "The Licensing Authority may apply conditions". This confirms the ability to apply conditions if you feel they are required, rather than having to apply them on all occasions.

I am sure you can understand the sense in this proposed change, and hopefully you are able to revise the final version accordingly. But please feel free to contact me if you do wish to discuss anything further.

Kind regards  
Brian



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## Kim Tuckey

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**From:** Debbie Houghton  
**Sent:** 18 February 2020 14:56  
**To:** Kim Tuckey  
**Subject:** FW: Gambling consultation

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,  
Commercial and Regulatory Directorate  
Tel: 01992 564336  
E-mail: dhoughton@eppingforestdc.gov.uk*

---

**From:** Malcolm Macdonald [REDACTED]  
**Sent:** 30 January 2020 11:11  
**To:** Licensing  
**Subject:** Gambling consultation

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I am writing with respect to the consultation on the Gambling Act 2005.

As a church leader I simply want to encourage the Council to act according to its remit of:

- 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
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

Rather than acting to help the local economy etc. I think we should be prioritising the welfare of our residents in our decisions, not economic gain.

Many thanks  
Malcolm Macdonald

[REDACTED]

[REDACTED]

[REDACTED]



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**Kim Tuckey**

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**From:** Debbie Houghton  
**Sent:** 18 February 2020 14:57  
**To:** Kim Tuckey  
**Subject:** FW: Gambling Act 2005

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,  
Commercial and Regulatory Directorate  
Tel: 01992 564336  
E-mail: dhoughton@eppingforestdc.gov.uk*

**From:** St Michaels Church [REDACTED]  
**Sent:** 30 January 2020 11:50  
**To:** Licensing  
**Subject:** Gambling Act 2005

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Dear K Tuckey

We were surprised to receive today the Council's Statement of Principles under the Gambling Act 2005.

As a church building, and one that lets out the hall to the community we do not allow gambling in any shape or form to take place here at St Michael and All Angels Church. We have not received one of these consultations in the past and was surprised to receive one today.

As a church we have a safeguarding policy and adhere to the child protection policies. We also have a policy for safeguarding vulnerable adults.

We run numerous groups and have members that help those who need care in the community and those affected by addiction in one form or another.

If you feel there is a reason why we had to receive this policy please could you advise us to where it would apply to us, so that we can adhere to it.

With Kind regards

Mrs Lisa McGee B.Sc(HONS) - St Michael's Church Secretary

**Kim Tuckey**

---

**From:** Debbie Houghton  
**Sent:** 18 February 2020 14:57  
**To:** Kim Tuckey  
**Subject:** FW: Gambling Act Consultation

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,  
Commercial and Regulatory Directorate  
Tel: 01992 564336  
E-mail: [dhoughton@eppingforestdc.gov.uk](mailto:dhoughton@eppingforestdc.gov.uk)*

**From:** cherry mcredie [REDACTED]  
**Sent:** 30 January 2020 11:10  
**To:** Debbie Houghton  
**Subject:** Re: Gambling Act Consultation

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I totally support this.  
Regards Cllr Cherry McCredie.

On Thu, 23 Jan 2020, 15:15 Debbie Houghton, <[dhoughton@eppingforestdc.gov.uk](mailto:dhoughton@eppingforestdc.gov.uk)> wrote:

Dear Colleague,

Please find attached this council's draft Gambling Act consultation Policy for your perusal or comment, please provide by comments by 19<sup>th</sup> February 2020,

Regards

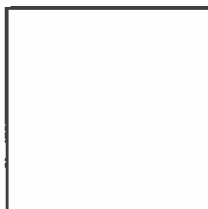
Debbie

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,*

*Commercial and Regulatory Directorate*

*Tel: 01992 564336*

*E-mail: [dhoughton@eppingforestdc.gov.uk](mailto:dhoughton@eppingforestdc.gov.uk)*



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## Kim Tuckey

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**From:** Debbie Houghton  
**Sent:** 18 February 2020 14:57  
**To:** Kim Tuckey  
**Subject:** FW: Gambling Act Consultation

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,  
Commercial and Regulatory Directorate  
Tel: 01992 564336  
E-mail: dhoughton@eppingforestdc.gov.uk*

---

**From:** Stephen Murray [REDACTED]  
**Sent:** 27 January 2020 12:01  
**To:** Debbie Houghton  
**Subject:** Re: Gambling Act Consultation

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I am assuming the highlighted green areas are where the changes are being made.

Having read these carefully i welcome their inclusion.

*Kind regards*

[REDACTED]

**- Independent Councillor Stephen Murray - Loughton Roding Ward**

---

**From:** Debbie Houghton <dhoughton@eppingforestdc.gov.uk>  
**Sent:** 23 January 2020 15:19

[REDACTED]

**Subject:** Gambling Act Consultation

Dear Colleague,

Please find attached this council's draft Gambling Act consultation Policy for your perusal or comment, please provide by comments by 19<sup>th</sup> February 2020,

Regards  
Debbie

**Miss Debbie Houghton**  
**Licensing Officer**  
**Licensing Team,**  
**Commercial and Regulatory Directorate**  
**Tel: 01992 564336**  
**E-mail: [dhoughton@eppingforestdc.gov.uk](mailto:dhoughton@eppingforestdc.gov.uk)**



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## Kim Tuckey

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**From:** Debbie Houghton  
**Sent:** 18 February 2020 14:57  
**To:** Kim Tuckey  
**Subject:** FW: Gambling Act Consultation

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,  
Commercial and Regulatory Directorate  
Tel: 01992 564336  
E-mail: [dhoughton@eppingforestdc.gov.uk](mailto:dhoughton@eppingforestdc.gov.uk)*

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**From:** Nigel Bedford [REDACTED]  
**Sent:** 23 January 2020 17:21  
**To:** Debbie Houghton  
**Subject:** Re: Gambling Act Consultation

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Hi Debbie ,  
Do we know any point 6 is the only one in red (public register)  
Regards  
Cllr Bedford

Sent from my iPad

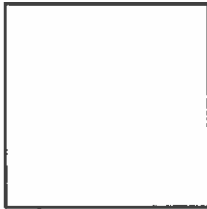
On 23 Jan 2020, at 15:07, Debbie Houghton <[dhoughton@eppingforestdc.gov.uk](mailto:dhoughton@eppingforestdc.gov.uk)> wrote:

Dear Colleague,

Please find attached this council's draft Gambling Act consultation Policy for your perusal or comment, please provide by comments by 19<sup>th</sup> February 2020,

Regards  
Debbie

*Miss Debbie Houghton  
Licensing Officer  
Licensing Team,  
Commercial and Regulatory Directorate  
Tel: 01992 564336  
E-mail: [dhoughton@eppingforestdc.gov.uk](mailto:dhoughton@eppingforestdc.gov.uk)*



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<Statement of Gambling Licensing Policy Jan 2020 jn amend (002) Final Draft.docx>

<Consultation Letter on Statement of Principles Under The Gambling Act 2005.docx>