



SOUTH
KESTEVEN
DISTRICT
COUNCIL

STATEMENT OF GAMBLING PRINCIPLES CONSULTATION – AUGUST 2022



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Communications and Consultation

September 2022

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Purpose

1. The purpose of this report is to update members of South Kesteven District Council's Environment Overview & Scrutiny Committee, Cabinet and Full Council with the results of the Gambling Statement of Principles Consultation.
2. The consultation was undertaken to ensure that
 - there was an opportunity for stakeholders to comment on the draft Statement of Principles
 - SKDC complies with Section 349 of the Gambling Act 2005. This requires all licensing authorities to review and publish every three years; a statement of principles that they propose to apply in exercising their functions under the act. The requirement to consult is set out within the process outlined in Statutory Instrument 636 (2006).

Scope

3. The scope of this consultation included:
 - Communicating the Council's priorities particularly in relation to public safety – protecting public health; the prevention of crime and disorder – promoting responsible gambling; and the prevention of public nuisance
 - Reflecting the Council's obligations in other areas - particularly in relation to the Gambling Objectives. These are to:
 - ❖ Prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - ❖ Ensure that gambling is conducted in a fair and open way
 - ❖ To protect children and other vulnerable persons from being harmed or exploited by gambling
 - Defining and communicating to all interested parties what is meant by gambling activity (what is included) i.e., gaming (playing a game of chance for a prize), betting (making or accepting a bet on the outcome of a race, competition or any other event) or taking part in a lottery (paying to take part in a process where prizes allocated via a process which relies purely on chance)
 - Ensuring that the Statement of Principles has been reviewed in line with legislative requirements
 - Ensuring that the views of those who wish to respond to the consultation do so, and are responded to, when appropriate, by the Licensing Team

Objectives

4. The objectives of the consultation were identified as follows. To:
 - Communicate that the review that has been undertaken, as required by the legislation- specifically the Gambling Act 2005
 - Raise awareness of the legislation that governs the provision of gambling
 - Illustrate that stakeholders were involved prior to the decision to approve the Statement of Principles

- Measure the degree of support or otherwise for the Statement of Principles in their current format
- Inform the decision that will be taken by the Council in respect of the Statement of Principles
- Ensure respondents were able to identify any potential issues

Timescales

5. Some work to identify potential amendments to the Statement of Principles has already been undertaken. Members of the Licensing Committee were asked for their comments and observations on these amendments at their meeting on 19 August 2022¹.
6. This was then broadened out to include other stakeholders. Starting on 22 August 2022, the consultation on the draft Statement of Principles was open for four weeks - closing on 18 September 2022. The results were analysed during the last two weeks of September and will be reported to the Environment Overview & Scrutiny Committee meeting on 11 October 2022. The results will also be considered by Cabinet on 8 November 2022 prior to approval by Full Council on 24 November 2022.

Stakeholders

7. The stakeholders were identified as follows:
 - Licence holders
 - The general public
 - Local businesses and trade associations
 - Town and Parish Councils
 - Charities
 - The Chief Constable of Lincolnshire Police
 - Lincolnshire County Council
 - Lincolnshire Fire and Rescue
 - Other sections in SKDC including Environmental Health and Planning
 - Lincolnshire Safeguarding Children Partnership
 - Gambling Commission

Methodology

8. The methods employed were dependent upon the type of stakeholder. The table overleaf identifies the method(s) which were thought to be the most appropriate for each of the stakeholder types:

¹ Meeting of licensing committee 19 Aug 2022 p13 – p47
[\(Public Pack\)Agenda Document for Licensing Committee, 19/08/2022 10:00](#)

Stakeholders	Method(s)	Details
Licence holders	All licence holders contacted by email and asked to complete a survey on-line.	Potential respondents were referred to survey monkey to participate in the consultation. If they didn't want to submit a response on-line, they were also able to leave their details and a member of staff from the licensing section would contact them to complete a survey with them over the phone. No licence holders chose this option.
Members of the public - general	<p>Members of the public were made aware of the consultation through the following channels:</p> <p>Press release to the local press</p> <p>SKDC Social Media Channels</p> <p>SKDC website</p> <p>Newspaper Advert – placed in Grantham Journal and Stamford Mercury on 26 August 2022</p>	<p>Potential respondents were referred to survey monkey to participate in the consultation. If they didn't want to submit a response on-line, they were also able to leave their details and a member of staff from the licensing section would contact them to complete a survey with them over the phone. No-one chose this option.</p> <p>Press Officer / Consultation officer prepared a press release promoting the consultation. Release included the link to the survey and a QR code.</p> <p>Social Media Officer promoted the consultation on social media channels by posting on Facebook and tweeting on Twitter. Posts included a link to the survey. Tweets and posts were prepared and approved by the Licensing Team Leader in advance of the consultation going live.</p> <p>Webpage contained the following information:</p> <ul style="list-style-type: none"> • a draft version of the policy • link to the survey and QR code <p>Advert contained the following information:</p> <ul style="list-style-type: none"> • Available for inspection from 22 August 2022 • In offices in Grantham and Bourne • Consultation between 22 August and 18 September 2022 • Link to the survey



SOUTH
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COUNCIL

PUBLIC NOTICE
SOUTH KESTEVEN DISTRICT COUNCIL
GAMBLING ACT 2005

Notice is hereby given that South Kesteven District Council is carrying out a consultation for the triennial review of the Gambling Statement of Principles, which the Council is required to produce in accordance with section 349 of the Gambling Act 2005.

The revised draft Statement of Principles is available for inspection from 22 August 2022 on the Council's website www.southkesteven.gov.uk.

Copies will also be available at the Council's area offices in Grantham and Bourne. Interested parties may also obtain a copy by contacting the Licensing Team at the Council Offices, St Peters Hill, Grantham NG31 6PZ or by phone 01476 406080.

The consultation takes place between 22 August 2022 and 18 September 2022. Any comments should be submitted via the survey <https://www.surveymonkey.co.uk/r/skdcsgp2022>, sent to the Licensing Team at the above address or via email policyconsultation@southkesteven.gov.uk.

Ayeisha Kirkman
Public Protection Manager

**Local
Businesses
and trade
associations**

Consultation promoted to specific local businesses /trade associations at same time as promoting to public – email sent

Potential respondents were referred to survey monkey and asked to participate in the consultation:

- British Beer & Pub Assocn
- British institute of Innkeeping
- Bingo association
- Association of British bookmakers
- Keeday Leisure
- Bet Fred
- Mark Jarvis
- Buzz Bingo
- Ladbrokes
- Coral
- William Hill

**Town and
Parish
Councils**

Parish Councils contacted by email and asked to complete a survey on-line.

A list of all contacts was obtained from Democracy/Member Services.

Charities	Charities contacted by email and asked to complete a survey on-line	Licensing Team contacted relevant charities who have asked for permission to carry out street-based collections or house to house collections in the last 12 months. These were: <ul style="list-style-type: none"> • GamCare • Samaritans
The Police – Chief Officer of Lincs Police and the Lincolnshire Police and Crime Commissioner	Chief officer for Lincolnshire Police contacted by email asking to complete a survey on-line	Chief officer for Lincolnshire Police and Police and Crime Commissioner contacted by the Licensing Team
Lincolnshire County Council	Email sent and asked to complete a survey on-line	Licensing Team contacted LCC
Lincolnshire Fire and Rescue	Email sent and asked to complete a survey on-line	Licensing Team contacted the chief officer for Lincolnshire Fire and Rescue on
Other sections in SKDC	Environmental Health & Planning email sent and asked to complete a survey on-line	Licensing Team contacted Environmental Health and Planning sections on
Lincolnshire Safeguarding Children’s Partnership	Email sent and asked to complete a survey on-line	Licensing Team contacted
The Gambling Commission	Enquiry form on website completed with link to the survey on-line	Licensing Team contacted

Details

- The survey for the Gambling Statement of Principles included the following sections:
 - An introduction to the consultation, why the policy has been reviewed (to comply with legislative requirements) and how feedback will be used and responded to
 - That the 2005 Act is currently being reviewed by central government to ensure its fit for purpose for the digital age. A white paper is expected to be issued at some point – although no date has yet been set
 - A question asking for any comments about the policy in general
 - An option for them to ask questions or make further observations about the Statement of Principles

- A question to collect the respondent's contact details should these be needed to respond to a query
- Demographic questions. These to include a question to identify the type of user (someone who holds a gambling licence, undertakes gambling, a member of the public, other local business, or other organisation etc)
- Specifying the duration of the consultation period
- A statement on how any personal data they supply will be treated
- A thank you and closing date

The webpage included:

- An introduction to the consultation, why respondents help is needed and how their feedback will be used.
- A copy of the draft policy

The press release included:

- An introduction to the consultation
- A link to the survey and the QR code
- Background to the proposals – why SKDC has to review the Statement of Principles
- What to do if they don't have on-line access
- Next steps

Promoting via Social Media channels included:

- An introduction to the consultation
- A link to the survey

The email/letter included:

- An introduction to the consultation
- A link to the survey and the QR code
- What to do if they want to complete the survey over the phone
- Next steps

The actions required were:

- The preparation and approval of survey content
- The setting up of the survey on the survey software
- Content for webpage determined
- The preparation and approval of the content for social media posts
- The preparation and approval of content for emails to other stakeholders

Data collection

10. The data from the survey was then collected electronically, downloaded into excel and analysed as soon as the consultation closed. Results were provided in both graph and tabular format.
11. As a result of the press release issued to promote the consultation in the local media, articles appeared in the Lincolnite, Grantham Matters and Grantham Journal². The consultation was

² <https://thelincolnite.co.uk/2022/08/south-kesteven-district-council-seek-residents-views-on-gambling-rules/>
<https://www.granthamjournal.co.uk/news/have-your-say-on-gambling-rules-9270230/>

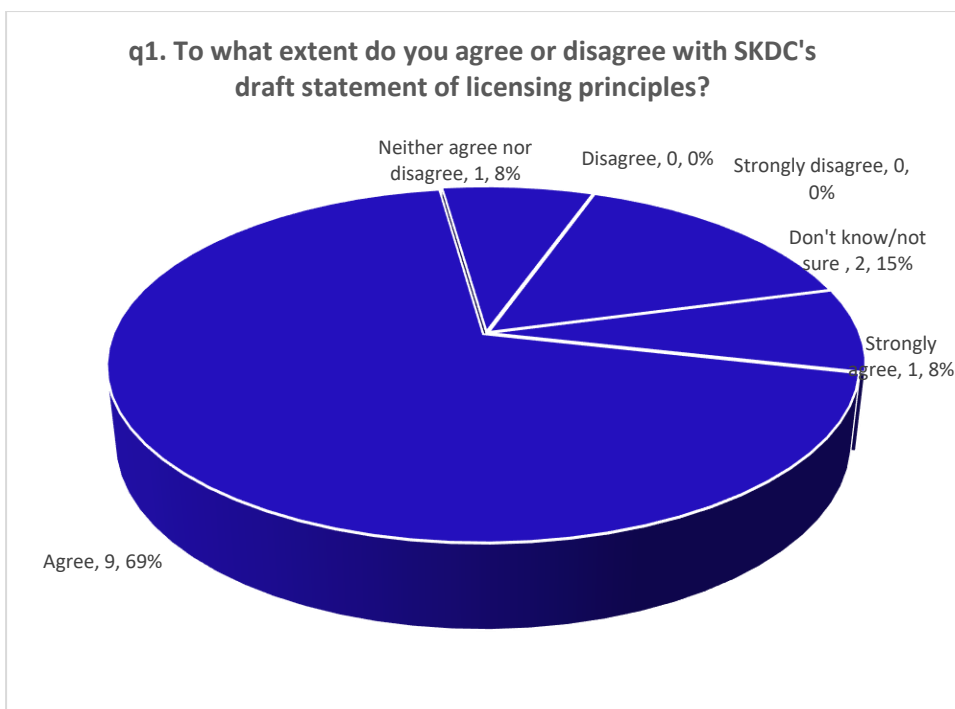
<https://www.granthammatters.co.uk/have-your-say-on-gambling-rules/>

also promoted on the Council's social media channels and website during the consultation period. The Facebook post on 22 August reached 1039 people and two clicked on the link. The second Facebook post on 1 September reached 1065 people and six clicked on the link. There were 222 impressions on Twitter, and no-one clicked on the link when the consultation was launched. On 1 September there were 221 impressions and one person clicked on the link.

12. The consultation closed on 18 September 2022. 13 responses were received – most of which were from residents (7) and/or town and parish councils (5). No replies were received from licence holders or prospective applicants, local businesses or any of the trade associations that had been contacted as part of the consultation. One response was received from someone representing another group or organisation, but they didn't specify which.

The results

13. Those responding to the survey were given an overview of the roles and responsibilities of the Council with regard to the licensing of premises and the issuing of permits and authorisations. Some of the regulatory functions in relation to gambling activities were outlined in the introduction to the survey including the pivotal role the statement of licensing principles plays in the licensing process. Setting out how gambling will be regulated in South Kesteven, the policy describes how premises will be licensed, and how fees will be set and collected.
14. The law requires all authorities to review their Statement of Licensing Principles every three years. Respondents were informed that SKDC's Statement of Licensing Principles 2023- 2026 had been updated to include the latest guidance available on various policies and procedures. These include information sharing and data protection and inspection and enforcement processes. Respondents were provided with a link to the policy in draft form, should they wish to view it, and then asked the extent to which they agreed or disagreed with the new policy.
15. Just over three quarters of respondents (10 or 76.9%) agreed with the draft Statement of Gambling Principles as illustrated in the chart overleaf:



16. Respondents were then asked if they had any questions or would like to comment on anything included in the Statement of Licensing Principles. Four comments were received. One respondent didn't think the policy referred to the Social Responsibility Code in enough detail. They also thought the policy didn't reflect the shift that has occurred in respect of online gambling (which is administered by the Gambling Commission). They also queried why the statement of licensing principles has been reviewed now, given it is in the process of being considered by central government. Their comments are listed below:

“The proposed statement makes reference to SR Code (social responsibility) however does not provide a link or detail it in the appendices.”

“Although the license statement is to create a controlled and safe environment, my understanding is Premises gambling is now the smallest access point to gambling with the majority now happening online and through apps, where participants can gamble at any location with significantly reduced control and safety; therefore, making the license approach virtually redundant.”

“Lastly it seems pointless progressing this gambling statement now if the government could change it, requiring changes to this statement.”

Another respondent thought gambling should not be permitted anywhere.

“Gambling establishments should not be allowed.”

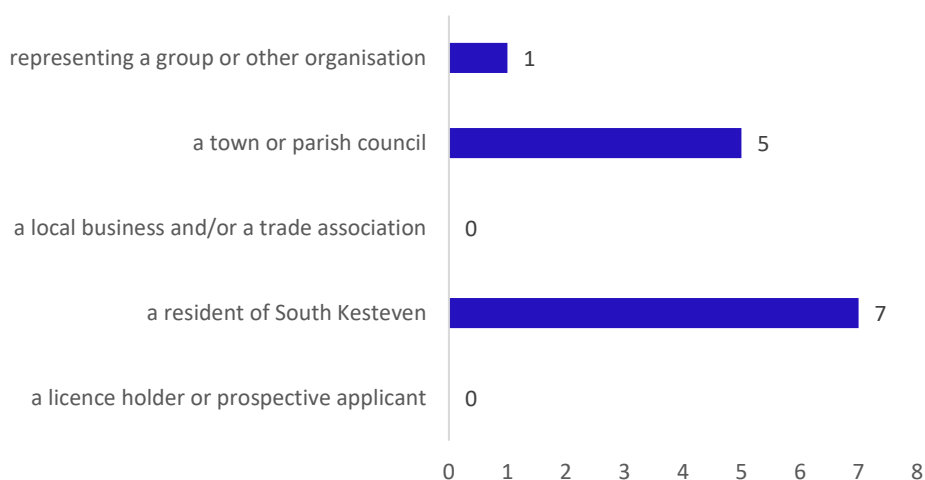
The third person to comment was critical of the length of the policy document and the consultation process, calling it a tick box exercise.

The fourth individual to comment requested that the policy include clarification on when registration isn't required. This is documented below:

“More detail should be given for small lotteries/sweepstakes to make it clear when NO registration or license is required.”

17. Each of these comments will be responded to by the Licensing Team Leader.
18. The final question on the survey asked respondents to state whether they were a licence holder or prospective applicant, a resident of South Kesteven, a local business or trade organisation, a town or parish council or representing a group or other organisation. Most responses were from either town or parish councils and/or residents, as illustrated in the chart below. Only one response was received from someone representing a group or other organisation but unfortunately, they didn't specify which organisation they represented. Respondents could choose more than one option.

q4. Please tell us if you are



Conclusion

19. The law requires licensing authorities to review their Statement of Licensing Principles every three years. SKDC's Statement of Licensing Principles 2023- 2026 has been updated to include the latest guidance available on various policies and procedures. These include information sharing and data protection, the whistleblowing policy, inspection and enforcement processes, and how the policy integrates with other strategies, policies and guidance.
20. Stakeholders were supplied with a link to the Gambling Statement of Principles document and asked to measure the extent to which they agreed or disagreed with it. They were also given the opportunity to comment on it and to raise any concerns they might have. Their feedback has been considered and responded to by the Licensing Team Leader, with changes incorporated into the policy where appropriate, prior to the document being considered by Environmental Overview & Scrutiny Committee on 11 October 2022. It will then be considered by Cabinet on 8 November 2022 prior to approval by Full Council on 24 November 2022.