

The background of the entire page is a photograph of a fountain. The fountain has a central, tall, narrow column of water that tapers to a point at the top. From the base of this column, several smaller jets of water spray outwards in a circular pattern. The water is illuminated from below, giving it a golden-yellow glow. The fountain is set against a dark, textured stone wall. The overall scene is captured in a low-angle shot, making the fountain appear imposing and dramatic.

Draft Gambling Statement of Licensing Principles Consultation

Full results summary

Data, Intelligence & Insight Team – October 2021

Introduction and Methodology

- [Introduction](#)
- [Consultation principles](#)
- [Methodology and promotion](#)
- [Interpreting this report](#)
- [Who are the respondents](#)

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

- [Displaying information on mental health, alcohol and drug services](#)

Sufficient knowledge to tackle risks associated with gambling

- [Staff alcohol intervention training](#)

Intervention to protect vulnerable persons from being harmed or exploited by gambling

- [Interventions for individuals who display anger or aggressive behaviour](#)

Access

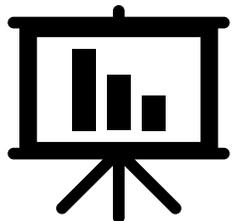
- [Accessing the premises](#)

Local Area Profile

- [Increase in detail in the local area profile](#)

Overall policy

- [Overall draft policy](#)
- [Parts of the draft policy that need more information](#)
- [Impact on you, your business or the wider community](#)
- [Draft policy: disagreements, comments, suggestions and impacts](#)





Introduction and Methodology



- Southampton City Council undertook public consultation on a Draft Gambling Statement of Licensing Principles. This included asking for feedback on five key themes:
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling
 - Sufficient knowledge to tackle risks associated with gambling
 - Intervention to protect vulnerable persons from being harmed or exploited by gambling
 - Access
 - Local Area Profile
- The consultation took place between **05/07/2021 – 26/09/2021**.
- The Statement of Licensing Principles is fully reviewed every three years. This is a legislative requirement.
- The aim of this consultation was to:
 - Communicate clearly to residents and stakeholders the proposed Statement of Licensing Principles Consultation.
 - Ensure any resident, business or stakeholder who wished to comment on the proposals had the opportunity to do so, enabling them to raise any impacts the proposals may have.
 - Allow participants to propose alternative suggestions for consideration which they feel could achieve the objective in a different way.
- This report summarises the aims, principles, methodology and results of the public consultation. It provides a summary of the consultation responses both for the consideration of decision makers and any interested individuals and stakeholders.
- It is important to be mindful that a consultation is not a vote, it is an opportunity for stakeholders to express their views, concerns and alternatives to a proposal. This report outlines in detail the representations made during the consultation period so that decision makers can consider what has been said alongside other information.



Southampton City Council is committed to consultations of the highest standard, which are meaningful and comply with *The Gunning Principles (considered to be the legal standard for consultations)*:

1. Proposals are still at a formative stage (a final decision has not yet been made)
2. There is sufficient information put forward in the proposals to allow 'intelligent consideration'
3. There is adequate time for consideration and response
4. Conscientious consideration must be given to the consultation responses before a decision is made



New Conversations 2.0
LGA guide to engagement



Rules: The Gunning Principles

They were coined by Stephen Sedley QC in a court case in 1985 relating to a school closure consultation (R v London Borough of Brent ex parte Gunning). Prior to this, very little consideration had been given to the laws of consultation. Sedley defined that a consultation is only legitimate when these four principles are met:

- 1. proposals are still at a formative stage**
A final decision has not yet been made, or predetermined, by the decision makers
- 2. there is sufficient information to give 'intelligent consideration'**
The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
- 3. there is adequate time for consideration and response**
There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,¹ despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
- 4. 'conscientious consideration' must be given to the consultation responses before a decision is made**
Decision-makers should be able to provide evidence that they took consultation responses into account

These principles were reinforced in 2001 in the 'Coughlan Case (R v North and East Devon Health Authority ex parte Coughlan²)', which involved a health authority closure and confirmed that they applied to all consultations, and then in a Supreme Court case in 2014 (R ex parte Moseley v LB Haringey³), which endorsed the legal standing of the four principles. Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed, and are frequently referred to as a legal basis for judicial review decisions.⁴

¹ In some local authorities, their local voluntary Compact agreement with the third sector may specify the length of time they are required to consult for. However, in many cases, the Compact is either inactive or has been cancelled so the consultation timeframe is open to debate

² BAILII, [England and Wales Court of Appeal \(Civil Decision\) Decisions](#), Accessed: 13 December 2016.

³ BAILII, [United Kingdom Supreme Court](#), Accessed: 13 December 2016

⁴ The information used to produce this document has been taken from the Law of Consultation training course provided by The Consultation Institute



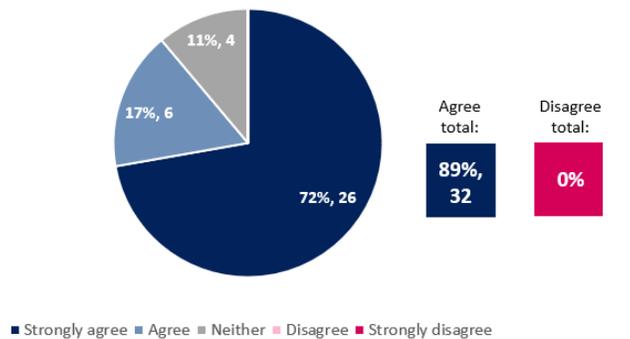
- The agreed approach for this consultation was to use an online questionnaire as the main route for feedback. Questionnaires enable an appropriate amount of explanatory and supporting information to be included in a structured questionnaire, helping to ensure respondents are aware of the background and detail of the proposals.
- Respondents could also write letters or emails to provide feedback on the proposals. Emails or letters from stakeholders that contained consultation feedback were collated and analysed as a part of the overall consultation.
- The consultation was promoted in the following ways by sending emails or letters to:
 - All gambling licence holders
 - Responsible authorities
 - Trade bodies
 - Southampton People's Panel (a panel of over 3700 residents)
 - Published on our website
- All questionnaire results have been analysed and presented in graphs within this report. Respondents were given opportunities throughout the questionnaire to provide written feedback on the proposals. In addition anyone could provide feedback in letters and emails. All written responses and questionnaire comments have been read and then assigned to categories based upon similar sentiment or theme. We have also endeavoured to outline all the unique points and suggestions gathered as a part of the consultation and so there are tables of quotes or summaries of these for each theme of comment.



Interpreting this report

- It is not the purpose of this report to make recommendations. It is intended to provide an accurate and objective reflection of the feedback received as part of the consultation, which can be used by decision makers as part of the decision making process.
- For each section and proposal, the following are provided:
 - A summary of the **quantitative results** presented in chart form. This is supplied at both city level (all responses received) and by key demographic group (gender and age) to better understand any variation in opinion / sentiment. The quantitative data is useful for understanding whether there is general agreement or disagreement with a proposal / priority.
 - Qualitative analysis of free text comments.** Free text comments provided by respondents have been analysed throughout the questionnaire and grouped by similar sentiment or theme. These **themes** are presented in table form with an indication of how frequently it was mentioned by unique individuals. Individuals may have commented on more than one theme, so could be represented more than once in a table. This qualitative information provides a richer picture of respondent views and may identify specific issues that need to be considered or addressed. A list of **unique points or quotes** within each theme. This provides an added level of granularity and allows more in depth exploration of important themes. Again, this may identify specific issues that need to be considered or addressed.

Quantitative analysis



Base respondents: 36

This graph is shown in percentage, followed by respondent count.

Unique points / quotes

A total of 8 respondents provided a comment on this topic 'If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details'. The table summarises the unique points and suggestions that were made.

Questions about the proposal (2)
Is there joined up thinking between gambling institutions?
This doesn't specify what the interventions are for. Are they to prevent individuals getting angry or prevent them from gambling more? Also, sometimes being angry at yourself can be socially constructive to gambling less.
Other comments (2)
We do not see any signs of this type of behaviour in the establishment.
I think that there's a link between this kind of behaviour in gambling and domestic abuse
Suggestions (3)
Such interventions should not be restricted to aggressive behaviour; intraversion could equally be a reaction to problem gambling.
This needs to be linked with some clear guidance on what such intervention would involve. It is not appropriate to place front-facing staff in roles where they are facing aggressive behaviour, and they should not be placed at risk in the workplace.
Training should annually renewed and ideally provided by a body other than the employer
Positive comments (1)
This is a good because it will prevent further escalation and the same of others

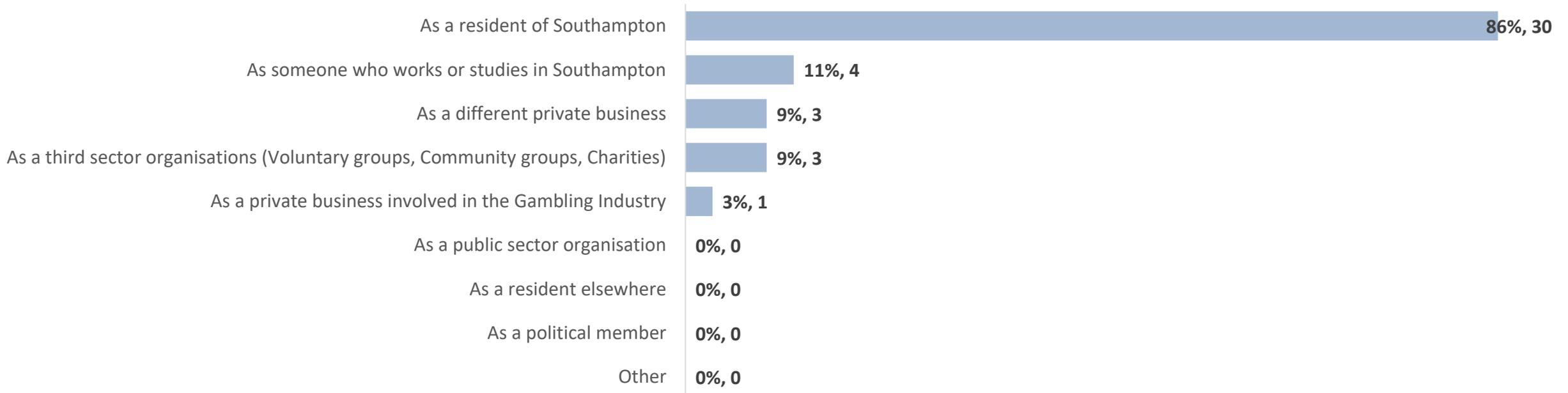


Who are the respondents?

Overall, there were **38** separate responses to the consultation. Responses came through the following routes:

	Total number of responses
Questionnaire	36
Emails / letters	2
Total	38

Respondents from the questionnaire were asked which of the following best described their interest in the consultation:





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



The first theme covered within the questionnaire was ‘protecting children and other vulnerable persons from being harmed or exploited by gambling’. As part of this, respondents were asked to provide feedback on each of the points of focus below. The following slides in this section detail the feedback provided.

The Gambling Act defines “children” as those persons under 16 years of age and “young persons” as those persons aged 16 or 17 years of age.

The term “vulnerable persons” is not defined, however the following offers some guidance:

- *People who gamble more than they want to*
- *People who gamble beyond their means*
- *People who may not be able to make informed or balanced decisions about gambling due to a lack of mental capacity, potentially due to cognitive or mental health conditions, alcohol, drugs or even some pharmaceutical treatments.*

We already expect all premises licence holders to have suitable safeguarding policies in respect of children, young persons and vulnerable persons. We already expect premises licence holders to ensure that all staff are trained to recognise safeguarding issues when they arise and act appropriately. Such policies must be kept updated and staff training refreshed at frequent intervals.

We are now also proposing that premises are expected to display information on mental health, alcohol and drug services on-site where it is accessible by customers and staff.



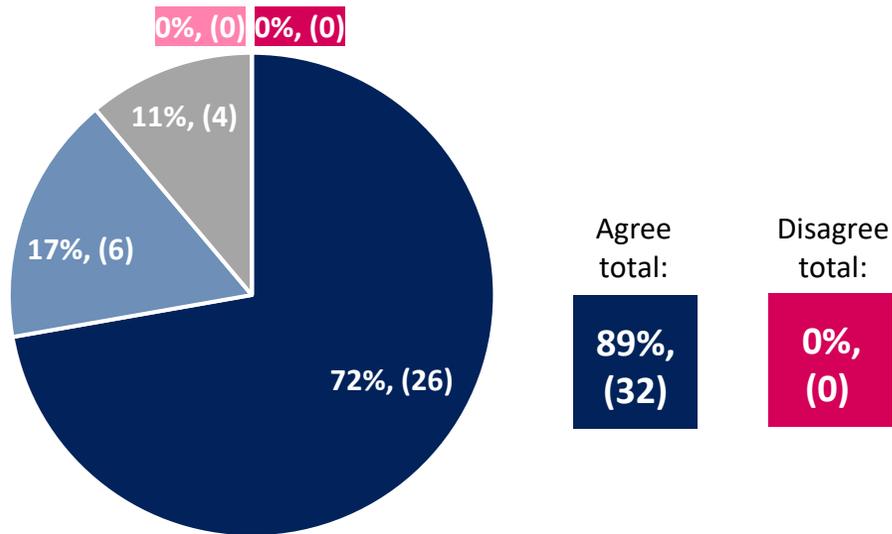
Key findings:

- The majority of respondents (89%) agree with the expectation that premises should display information on mental health, alcohol and drug services on-site.
- No respondents disagreed with this priority

The detail:

Question: To what extent do you agree or disagree with the expectation that premises display information on mental health, alcohol and drug services on-site?

Overall:



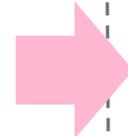
■ Strongly agree ■ Agree ■ Neither ■ Disagree ■ Strongly disagree

Agree total:

89%,
(32)

Disagree total:

0%,
(0)



A total of 8 respondents provided a comment on this topic 'If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details'. The table summarises the unique points and suggestions that were made.

Other comments (2)
<i>Exactly where do you want these policies to be displayed. Do you want posters or proper files on each subject.</i>
<i>Premises should not use advertising and glitz to promote themselves and individual services. Tobacco is sold devoid of such promotions; gambling should be on the same footing.</i>
Positive comments (2)
<i>I totally agree with this. More information that is out there and available is vital</i>
<i>I agree</i>
Suggestions (5)
<i>Probably another information requirement is the probability of winning a gamble. Example is a warning displayed by some spread betting companies that 67% of people lose money when spread betting.</i>
<i>Please check the details are regularly updated and that they work</i>
<i>These should be free and locally available services able to provide adequate long-term support</i>
<i>Information should be displayed outside as well as inside. There should be a minimum size of display, and of the font(s) used. The information should be up to date and accurate.</i>
<i>I feel this simply pays lip-service to a requirement and provided no active support to individuals all whilst placing a completely inessential temptation and cause of mental health distress in their neighbourhood.</i>

Base respondents: 36

This graph is shown in percentage, followed by respondent count.



Sufficient knowledge to tackle risks associated with gambling



The second theme covered within the questionnaire was ‘sufficient knowledge to tackle risks associated with gambling’. As part of this, respondents were asked to provide feedback on each of the points of focus below. The following slides in this section detail the feedback provided.

We already expect all customer-facing and management staff in premises licensed under the Gambling Act 2005 to have sufficient knowledge to tackle risks associated with gambling and know how to promote responsible gambling.

We are now proposing that staff also receive alcohol intervention training for premises that supply alcohol by retail under the authority of a premises licence granted under the Licensing Act 2003.

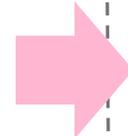
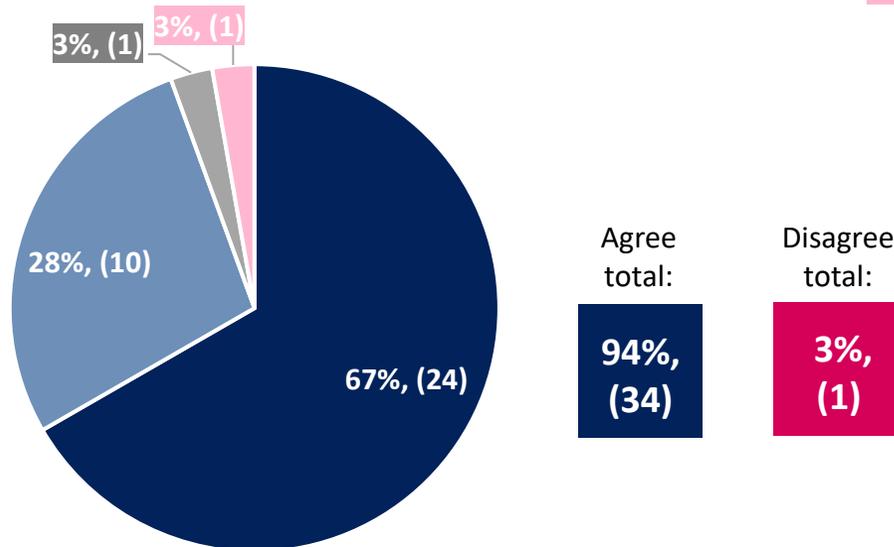


Key findings: • The majority of respondents (94%) agreed that staff should receive alcohol intervention training

The detail:

Question: To what extent do you agree or disagree with the proposal that staff receive alcohol intervention training?

Overall:



A total of 8 respondents provided a comment on this topic 'If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details'. The table summarises the unique points and suggestions that were made.

Other comments (1)
wonder how safe it would be in some areas for staff to intervene.
Positive comments (2)
I agree that everyone should be aware when someone has had enough to drink and to inform that person they can not have any more drink and must vacate the premises.
I agree
Suggestions (4)
Training should be given every year and a certificate showing that should be on display. Ideally the intervention training should be supplied by a body other than the employer
if they have a concern, they should raise it with management or the door staff to get support
do not allow premises to supply alcohol and offer gambling at the same time.
Would be great if this training could be a recognised qualification which staff can also benefit from

■ Strongly agree ■ Agree ■ Neither ■ Disagree ■ Strongly disagree

Base respondents: 36

This graph is shown in percentage, followed by respondent count.



Intervention to protect vulnerable persons from being harmed or exploited by gambling



The third theme covered within the questionnaire was ‘intervention to protect vulnerable persons from being harmed or exploited by gambling’. As part of this, respondents were asked to provide feedback on each of the points of focus below. The following slides in this section detail the feedback provided.

We already expect all premises offering gambling to have a mechanism in place to identify vulnerable persons and to monitor and intervene where customers may be gambling beyond their means or more than they would like. Intervention may include raising the customer’s awareness of the existence of support services and the availability of a voluntary exclusion scheme. However, intervention may also include directing a counselling session and following that session potentially mandatory exclusion.

We are now proposing premises also have in place interventions for individuals who are displaying anger or aggressive behaviour linked to their gambling prior to leaving the premises to reduce the impact of harmful gambling on associates of participants.

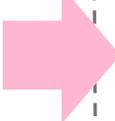
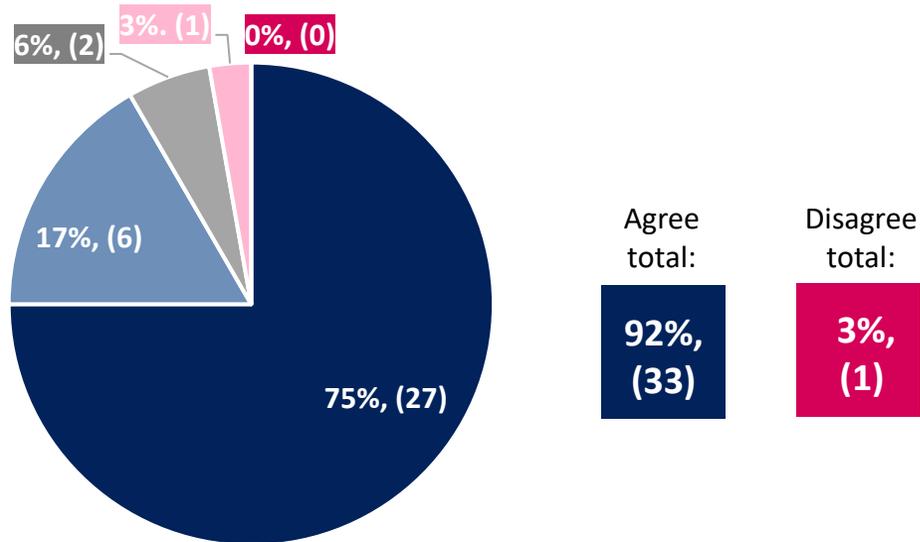


- Key findings:**
- The majority of respondents (92%) agreed that premises should have interventions in place for individuals who display anger or aggressive behaviour linked to their gambling.

The detail:

Question: To what extent do you agree or disagree with the proposal that premises have in place interventions for individuals who are displaying anger or aggressive behaviour linked to their gambling prior to leaving the premises?

Overall:



A total of 8 respondents provided a comment on this topic 'If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details'. The table summarises the unique points and suggestions that were made.

Questions about the proposal (2)
<i>Is there joined up thinking between gambling institutions?</i>
<i>This doesn't specify what the interventions are for. Are they to prevent individuals getting angry or prevent them from gambling more? Also, sometimes being angry at yourself can be socially constructive to gambling less.</i>
Other comments (2)
<i>We do not see any signs of this type of behaviour in the establishment.</i>
<i>i think that there's a link between this kind of behaviour in gambling and domestic abuse</i>
Suggestions (3)
<i>Such interventions should not be restricted to aggressive behaviour; intraversion could equally be a reaction to problem gambling.</i>
<i>This needs to be linked with some clear guidance on what such intervention would involve. It is not appropriate to place front-facing staff in roles where they are facing aggressive behaviour, and they should not be placed at risk in the workplace.</i>
<i>Training should annually renewed and ideally provided by a body other than the employer</i>
Positive comments (1)
<i>This is a good because it will prevent further escalation and the same of others</i>

■ Strongly agree ■ Agree ■ Neither ■ Disagree ■ Strongly disagree

Base respondents: 36

This graph is shown in percentage, followed by respondent count.



Access



The fourth theme covered within the questionnaire was 'access'. As part of this, respondents were asked to provide feedback on each of the points of focus below. The following slides in this section detail the feedback provided.

We are proposing that premises should take such steps as are reasonably practicable to ensure entrances and exits to the premises will enable persons using the premises (including disabled persons) and the facilities to be safe and free from risks to health. While such persons are present on the premises every exit provided for their use shall be unsecured and free from obstruction.

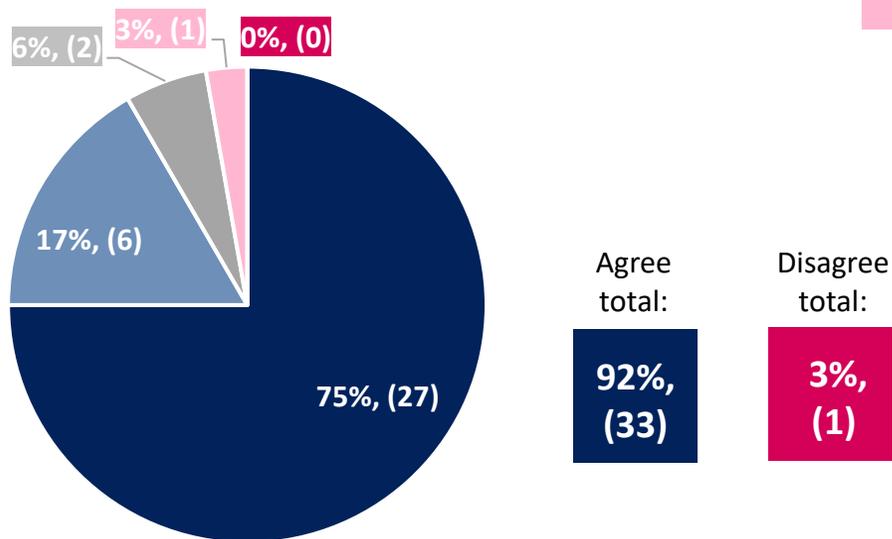


Key findings: • The majority of respondents (92%) agreed with the proposal regarding access to the premises.

The detail:

Question: To what extent do you agree or disagree with the proposal regarding access to the premises?

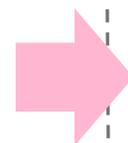
Overall:



Agree total: **92%, (33)**

Disagree total: **3%, (1)**

■ Strongly agree ■ Agree ■ Neither ■ Disagree ■ Strongly disagree



A total of 7 respondents provided a comment on this topic 'If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details'. The table summarises the unique points and suggestions that were made.

Other comments (2)
<i>Reasonable adjustment for disability access is a legal requirement. Not sure why this needs to be separately stated in this consultation, nor why there should be opportunity to object.</i>
<i>We have two different entrances available, depending on your circumstances. We have a proper disabled access toilet with hand rails and a panic pull cord in place. All main aisles are disable friendly and free from obstruction.</i>
Positive comments (2)
<i>Access for all is good</i>
<i>why would you not? Surely all doors / fire doors need to be useable?</i>
Suggestions (2)
<i>If this is a new requirement in law then premises must be given a decent period of time to achieve this</i>
<i>The wording here is vague. Fire exits that are signposted should be free of obstruction and safe, of course. But premises buildings could have exits that are not accessible to the public or fire exits. These shouldn't need to be included</i>
Should not be encouraging gambling (2)
<i>I am not sure encouraging anyone to gamble is a good idea.</i>
<i>what does this have to do with gambling? Anything making access to gambling harder is probably a good thing...</i>

Base respondents: 36

This graph is shown in percentage, followed by respondent count.



Local Area Profile



The next theme covered within the questionnaire was 'Local Area Profile'. As part of this, respondents were asked to provide feedback on each of the points of focus below. The following slides in this section detail the feedback provided.

We are proposing that the Draft Policy contains a significantly more detailed local area profile for applicants and licence holders to consider when making their applications and preparing their risk assessments.

The draft policy now contains information and maps on:

- *Deprivation (including the Indices of Deprivation)*
- *Housing (including information on homelessness, overcrowded households, population density)*
- *Benefit claimants*
- *Locations of schools*
- *Age ranges of the population*
- *Information on ethnicity*
- *Locations of supported living accommodation for people with a learning disability.*
- *Locations of homeless hostels and alcohol accommodation service shelters*
- *Rates of admissions for alcohol specific conditions*
- *Rate of admissions for poisoning by illicit drugs*
- *Rate of admissions of drug related mental health and behavioural admissions*
- *Proportion of Adults aged 18+ with depression*



Increase in detail in the local area profile

Key findings:

- The majority (81%) of respondents agreed with the proposed increase in detail in the local area profile

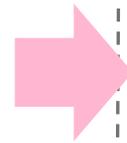
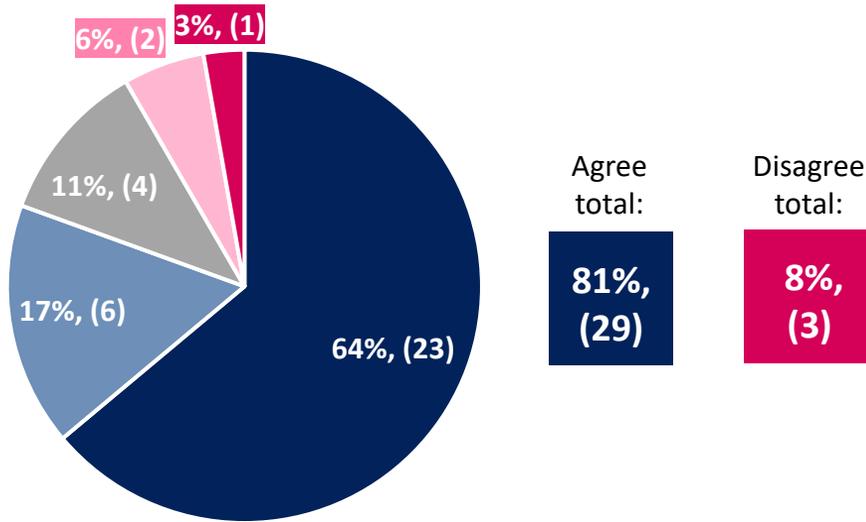
A total of 9 respondents provided a comment on this topic 'If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details'. The table summarises the unique points and suggestions that were made.

Other comments (2)
<i>it's strange how the slot machine places seem to target area...</i>
<i>caution should be taken in providing deprivation information. This may increase demand for nicer areas and lessen demand for slightly deprived ones. On a macro level, this may increase the economic gap between rich and poor even further. Do we really want areas of deprivation (like slums) or areas with a prominent ethnicity group? Diversity is a good thing for the city.</i>
Positive comments (3)
<i>Very good idea</i>
<i>I strongly agree</i>
<i>More information for the public is a good thing.</i>
Suggestions (6)
<i>I believe you should include data regarding admissions to A&E for alcohol poisoning in local areas. Also levels of domestic abuse and safeguarding</i>
<i>should also include the density of gambling already available in an area.</i>
<i>ideally the policy should aim to reduce over time the number of such premises in areas of higher deprivation</i>
<i>A decision to limit access to gambling opportunities for those most vulnerable, and/or those living in poverty is essential.</i>
<i>All of the above information is used to profile neighbourhoods and identify those with the greatest vulnerability to gambling. Without firm assurances that this data will be used to ensure gambling locations will not be situated in struggling neighbourhoods, this increases the likelihood vulnerable individuals will be exploited.</i>
<i>Provision of such information seems pointless without the expectation that applicants must respond to it and justify their application. It would help to grade the various performance indicators so that areas where additional opportunities to gamble would be toxic can readily be identified, and applications discouraged or discounted accordingly.</i>

The detail:

Question: To what extent do you agree or disagree with the proposed increase in detail in the local area profile?

Overall:



■ Strongly agree ■ Agree ■ Neither ■ Disagree ■ Strongly disagree

Base respondents: 36

This graph is shown in percentage, followed by respondent count.



Overall policy



Overall Draft Policy

Have you read the proposed draft policy?

25%,
(9)

Yes, all of it

44%,
(16)

Yes, some of it

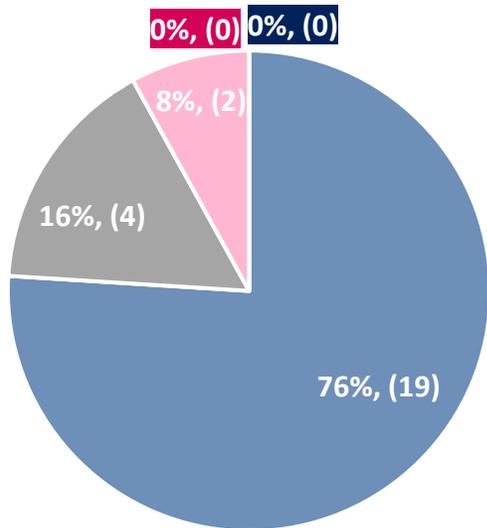
31%,
(11)

No

If you have read the proposed policy, to what extent do you agree or disagree with the following statements?

These graphs are shown in percentage, followed by respondent count.

The draft policy is easy to understand.



Strongly agree Agree Neither
Disagree Strongly disagree

Agree total:

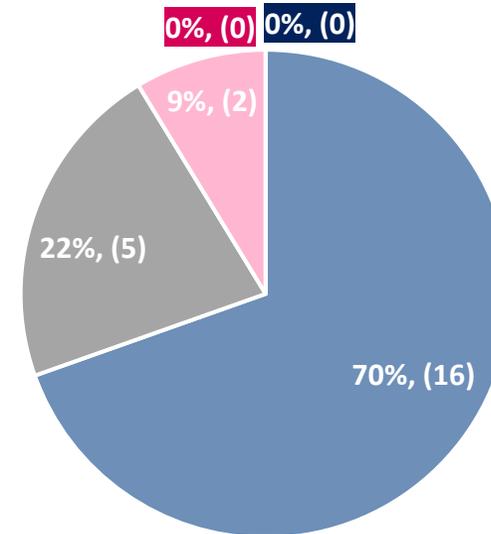
76%,
19

Disagree total:

8%,
(2)

Base respondents: 25

The draft policy provides sufficient information.



Strongly agree Agree Neither
Disagree Strongly disagree

Agree total:

70%,
(16)

Disagree total:

9%,
(2)

Base respondents: 23



Parts of the draft policy that need more information

A total of **7** respondents provided a comment in the survey and **1** email/letter came in on this topic, if there were ‘parts of the draft policy respondents did not understand or felt needed more information.’ The following table summarises the unique points and suggestions that were made.

More information needed (8)
<i>It needs more local data.</i>
<i>9.5.6 item "gamble more than they want to" is a bit vague - how would one assess whether this was the case?</i>
<i>Needs more simple explanations so that it can be simply understood by ALL persons</i>
<i>More detail could be given on how interventions will be made should problems arise.</i>
<i>Paragraph 3.5.6 refers to research undertaken by City of Westminster Council, Manchester City Council and the LGA and then contains a list of bullet points which purports to identify groups at greater risk of harm from gambling. The inclusion of this list without any context whatsoever is misleading, pejorative and does not assist the policy. Accordingly, the list of bullet points and the reference to the research should be removed. If this is not removed then much more context needs to be given and we respectfully submit that the statement of principles is not the relevant vehicle for a discussion with regard to research. Context is very important. For example, the bullet points suggest that people from Asian or Oriental ethnic groups are at greater risk of harm from gambling. It is not that simple. The research (Wardle 2015) states, "where both adults and children of Asian backgrounds were far less likely to gamble than their white British counterparts, yet those that did were more likely to experience problems." Similarly, when discussing matters of deprivation, the same research piece stated, "the evidence relating to household income and gambling harms is mixed showing that generally those of lower income are less likely to gamble but those that do spend a higher proportion of their income on gambling. This was highlighted as a concern given the "likely" lesser ability of lower income households to protect themselves from financial instability (Brown ET AL, 2011). However, as stakeholders noted, there is some unease about labelling all low-income households as vulnerable as income, gambling, debt and money management are likely to interact to shape outcomes." The draft statement of principles must include context. Otherwise, the impression is given that all persons who are young, are of Asian or oriental ethnic groups, who are unemployed or live in deprived areas are presumed to be vulnerable.</i>
<i>Section 11 of Part B explains the Authority's approach to the imposition of conditions on premises licences. This section would be assisted by a clear statement that the mandatory and default conditions are designed to be, and usually are, sufficient to ensure operation that is reasonably consistent with the licensing objectives. Accordingly, additional conditions will only be imposed where, in the circumstances of the case, there is evidence of a risk to the licensing objectives that is not adequately addressed by the mandatory and default conditions or policies, procedures and mitigation measure outlined in the local area risk assessment.</i>
<i>The sentence within paragraph 11.2 that indicates that the Licensing Authority will expect an applicant to offer suggestions as to the way in which the licensing objectives can be met should be re-drafted so that it is understood that this is not expected within the licence application but rather within the risk assessment. As this statement appears in the section relating to conditions on the premises licence, this must be made clear. The inclusion of this sentence in this section suggests that the policies, procedures and mitigation measures may be "converted to" or form the basis of premises licence conditions in the same way as operating schedule statements are treated in applications under Licensing Act 2003. Under Gambling Act 2005, the imposition of conditions should only be considered where the policies, procedures or mitigation measures outlined in the risk assessment do not adequately address the identified risk. The reason for this is that the risk assessment is a dynamic document and (in accordance with SR Code Provision 10.1.2) must be reviewed if there is a significant change in local circumstances. As risks change, or new risks are identified, the policies, procedures and mitigation measures to address those identified risks may be changed very quickly. However, if the mitigation measures are the subject of premises licence conditions then an application for variation of the premises licence will be required to change these conditions. This could delay changes and would cause unnecessary expense and administration for operators.</i>
<i>Paragraph 17.1 refers to the ability of the Licensing Authority to impose conditions on the number of betting machines an operator proposes to offer. This paragraph should be re-drafted so that there is a clear differentiation is made between the Authority's powers to limit the numbers of betting machines and gaming machines. This paragraph should be clear that whilst the Licensing Authority has the ability to condition the number of betting machines, the holder of a betting premises licence may make available up to four category B, C or D machines available for use. This right to four gaming machines cannot be fettered by condition.</i>
Other suggestions (1)
<i>The document requires proof reading as there are a number of errors in it.</i>



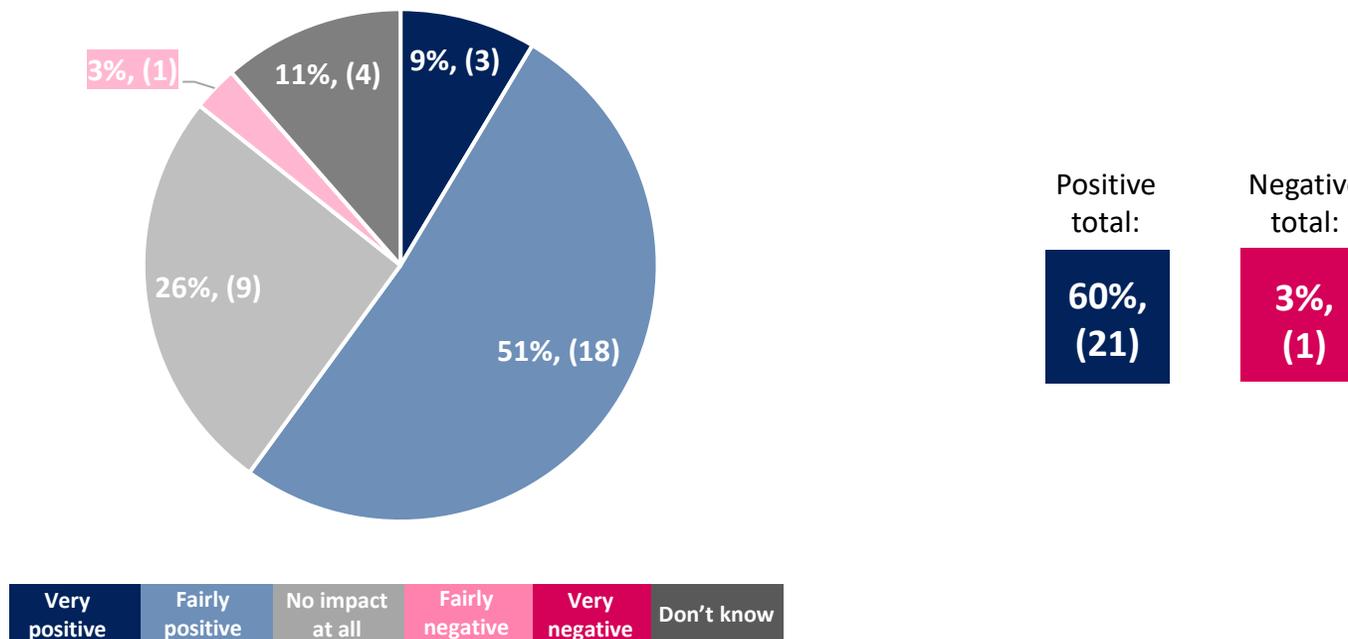
Key findings:

- The majority of respondents (60%) highlighted that if the draft policy was to be implemented, it would have a positive impact on themselves, their business or the wider community.
- Just over a quarter of respondents (26%) selected that if the draft policy was to be implemented, it would have no impact at all on them, their business or the wider community.

The detail:

Question: If the draft policy was to be implemented, what impact do you feel this may have on you, your business or the wider community?

Overall:



Base respondents: 35

This graph is shown in percentage, followed by respondent count.



A total of **6** respondents provided a comment in the survey and **1** email/letter came in on this topic, if respondents ‘disagreed with anything about the draft policy or had any comments, impacts, suggestions or alternatives they felt we should consider.’ The following table summarises the unique points and suggestions that were made.

Other comments (4)
<i>I have NEVER gambled and I drink very little. I am retired and thus dont own any business which it would effect</i>
<i>Not to sure if I have the expertise to make a proper judgement. My personal experience is working in the motor trade for about 25 years.</i>
<i>Gambling does not affect me personally, and I don't know how much impact it has on the local area, but I have heard a lot on the radio about the problems so many more people have developed that I feel we have to put as much in place as possible to help stop problems developing.</i>
<i>I think it would make those who use illegal means of gambling less public.</i>
Suggestions (2)
<i>I would hope that draft policy is distributed as widely as possible to those who have the experience.</i>
<i>Just that this may require more policing that is not available and is very much linked into wider public health issues that may be effected positively or negatively by the policy</i>
Negative comments (3)
<i>The council is neither bold nor ambitious enough to declare gambling premises as broadly a negative addition to our neighbourhoods in Southampton. Whilst it claims to better support individuals, it ultimately facilitates the growth of a distateful industry that exploits the vulnerable for finacial gain. Gambling locations are not part of healthy neighbourhoods. This policy does not go anywhere near far enough to halt the profusion of these premises in the city which contribute positively to the councils coffers but have an extremely negative impact on our communities.</i>
<i>Fed up with antisocial behaviour and gatherings outside of arcades / some bookmakers in the city.</i>
<i>Within paragraph 9.5.14, there is a paragraph requiring that where under 18's are loitering outside a premises, steps should be taken by the premises licence holder (although the word "holder" is missing) to discourage them from loitering there. This is not a matter of responsibility for a premises licence holder who has no power to "move on" persons loitering and this cannot be an expectation of the premises licence holder.</i>
Positive comments about the draft consultation (2)
<i>Having had experience of preparing and reading draft plans, then revised plans, you can get bogged down in jargon. But I got the salient points and felt confident enough to be able to comment.</i>
<i>On behalf of the [anonymised], we thank you for the opportunity to comment on your draft statement of principles [...] We will work with you to ensure that its members' operation of its premises will operate in accordance with the licensing objectives.</i>