

Consultee	Comment	Recommendation
Gamcare	<ul style="list-style-type: none"> • We welcome the position Medway Borough Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles. • 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. • It is vital that Medway 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. • Building on the proactive approach the council is already taking, we would like to see Medway Council commit in its statement of principles to a public health approach to gambling, outside of its licensing objectives. • 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. • In the absence of Cumulative Impact Assessments as a method by which the "aim to permit" approach can be challenged, Medway Council should continue to pursue a Local Area Profile approach that specifically analyses gambling risk, and use this data as a basis from which to scrutinise and possibly oppose a licensing application. • The changes to Medway 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. 	<p>The comments are noted and appreciated, but no changes recommended.</p> <p>The Licensing Authority does not have geographical data or evidence suggesting any specific issues within its area with which to produce a suitably detailed local area profile.</p> <p>Applicants should provide details of how they intend to promote the licensing objectives and should be able to evidence their knowledge of the area they wish to open their premises in, in their Local Risk Assessment.</p>