

## **11. Local Risk Assessments**

**11.1** The Gambling Commission Licence Conditions and Codes of Practice (as updated in April 2015) formalise the need for operators to consider local risks. Local risk assessments apply to all non-remote casino, adult gaming centres, bingo, family entertainment centre, betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences. The provision comes into force on 6 April 2016. The 5<sup>th</sup> edition of the Guidance at parts 6.41 to 6.46 further details the requirements.

**11.2** Licensees are required to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies and procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in this statement of principles. West Dunbartonshire Officers may request a copy of this at any time. It is expected that Premises Managers will be conversant in their individual risk assessment. The effectiveness of the policy should also be reviewed and monitored.

**11.3** Licensees are required to undertake a local risk assessment when applying for a new premises licence. Their local risk assessment must also be updated and reviewed:

- When applying for a variation of a premises licence;
- To take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
- When there are significant changes at a licensee's premises that may affect their mitigation of local risks.

**11.4** The new Social Responsibility Provision is supplemented by an Ordinary Code provision that requires licensees to share their risk assessment with licensing authorities. Ordinary Codes are not a mandatory requirement but are expected to be followed unless alternative arrangements that can be put in place that are equally effective.

**11.5** West Dunbartonshire Licensing authority expect that all local risk assessments will take into account the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. Where appropriate the Board would expect that local risk assessments take into account the vicinity of licensed premises to schools, gambling or addiction support or treatment centres where children or vulnerable groups may be present. Links listed at appendix 2 are provided to assist licence holders and applicants and those seeking to make representations to the Licensing Board. These assist in giving the location of such places. It is expected that operators take close cognisance of where prospective premises may be situated in the vicinity and at times where such persons may be there and take appropriate steps to mitigate risks in such areas in terms of the licensing objectives. This would in particular but not exhaustively, include steps such as ensuring that advertising is appropriately monitored.

It is the case however, that the Board will consider all representations to it in terms of the Guidance and whether the locations of such premises are higher risk and whether additional controls are required. Applicants should be prepared to demonstrate to the Board how they will address any properly identified concerns or mitigate the risks.

**11.6** The Board would also welcome any proposals between operators in town centre areas where there are a concentration of Gambling Premises areas such as Clydebank

Town Centre, Dumbarton town centre and Alexandria Town Centre for a self-exclusion network for declared 'problem gamblers' to be set up in these areas between operators. The Board notes the Medway Responsible Gambling Partnership scheme (the first of its kind voluntary agreement scheme for self-exclusion set up by Medway Council and the Association of British Bookmakers) that has been piloted in Glasgow and would welcome this being extended to other Local Authority areas. 15

It is estimated that in 2014 the Scottish Health Survey 2014 (as calculated by the Scottish Public Health Observatory in 2015: <http://www.scotpho.org.uk/behaviour/gambling/key-points> ) that almost one in 100 Scottish Adults were problem gamblers. A further 1.5 % were likely to be at risk of gambling problems, based on a standard risk questionnaire. In West Dunbartonshire using a base population of over 18's of 70,000 people this would equate to 560 people being problem gamblers and a further 1,050 would potentially be at risk of gambling problems taking into account the standard risk questionnaire. In 2014 an association between gambling and socio deprivation and gambling and poor mental health was identified: ([http://www.scotphn.scot.nhs.uk/wpcontent/uploads/2015/09/2014\\_06\\_30\\_Scot\\_PHN\\_GamblingRelated\\_Harm\\_Final1.pdf](http://www.scotphn.scot.nhs.uk/wpcontent/uploads/2015/09/2014_06_30_Scot_PHN_GamblingRelated_Harm_Final1.pdf)).