

## Wokingham Responses to the Statement of Gambling Principles – Appendix 2

Respondent	Comment	Response
<p>Head of Adult Safeguarding, Care Governance and ASC Covid-19 Taskforce Wokingham Borough Council</p>	<p>1. Page 11 – <i>“When determining an application for a premises licence or review of a premises licence, regard will be had to the proximity of the premises to schools, vulnerable adult centres or residential areas where there may be a high concentration of families with children”</i>. I don’t think the phrase ‘vulnerable adult centres’ really means anything – may want to consider rewording along the lines of e.g., <b>“buildings which house services for vulnerable adults”</b>?</p> <p>2. Page 12 – <i>“Where children and other vulnerable people are allowed access to premises where gambling takes place, the licensing authority may take such steps as are lawful and necessary to either limit access generally or introduce measures to prevent under-age gambling”</i>. Would you wish to consider rewording to reflect; <b>“to prevent under-age gambling, or gambling by those people who lack mental capacity to make informed decisions in that respect”</b>?</p> <p>3. Page 13 – <i>“As regards the term “vulnerable persons”, it is noted that it is not defined in the Act and the Gambling Commission does not seek to offer a definition, but states that “it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able</i></p>	<p>It is obviously subjective. The phrase “vulnerable adult centres” is used by the Gambling Commission in the Guidance to Licensing Authorities. The SoGP is therefore consistent with the Guidance. Having said that, a different form of words can be used provided that the meaning is clear.</p> <p>If it is considered to be appropriate, in view of the reference at the outset to vulnerable people, I would not have any objection to rewording to say “to prevent under-age gambling, or gambling by vulnerable persons”.</p> <p>If it is considered to be appropriate, I would not have any objection to rewording to say “and people who may in accordance with the MCA 2005 (or any subsequent</p>

	<p>to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.” The licensing authority will consider this licensing objective on a case by case basis”. Would it be preferable to re-word this to bring it in line with the Mental Capacity Act 2005, e.g., “and people who may in accordance with the MCA 2005, lack mental capacity to make informed decisions about gambling”.</p>	<p>legislation), lack mental capacity to make informed decisions about gambling (for example, due to a mental impairment, alcohol or drugs)”.</p>
--	--	---