

Report Summary

Report to:	Licensing and Environmental Regulatory Committee		
Date of meeting:	18 November 2025		
Report of:	Jon Dyson, Director of Place	Report Number:	46321
Reporting Officer:	Garry Parker, Assistant Director Environment and Regulatory Services		
Contact Officer:	Patricia Clyne, Licensing Manager		
Report title:	Gambling Act 2005 Statement of Principles		
Confidentiality Non- confidential This report does not contain information which warrants its consideration in the absence of the press and members of the public.			
Purpose:	The Council is required by statute to review and publish a Statement of Principles, commonly referred to as ‘The Gambling Policy’, every three years. The most recent Statement of Principles was published in 2022 and is now due for review. The report provides information in respect of the new Statement of Principles and recommends that the Licensing Environmental and Regulation Committee approve the consultation as detailed in the report. The report also updates the Committee on the Governments White Paper.		
Recommendations:	The Committee is recommended to: Consider the content of the report and approve consultation on the Gambling Act 2005 Statement of Principles.		
Decision:			
Background documents:	Gambling Act 2005 - Gambling Act 2005 Department of Culture, Media, and Sport White Paper - High stakes: gambling reform for the digital age - GOV.UK Bolton Council’s Statement of Principles 2026 -2029 - Appendix A (attached as a separate document). Proposed changes to Statement of Principles - Appendix B Equality Impact Assessment - Appendix C.		
Signed:		Monitoring Officer	
Date:			

<u>Consultation with other officers</u>				
Finance	Yes	24/10/2025	Joanne Glover	
Legal	Yes	Date	Louise McGuinness	
HR	Yes	07/10/2025	Kelly Hale	
Procurement	Yes	21/10/2025	Sarah Atherton	
Climate Change	No	Date	Insert name	
Information Governance	No	Date	Insert name	
Technology	No	Date	Insert name	
Equality Impact Assessment	Yes	13/10/2025	Tammy Tatman	
Post consultation reports Please confirm that the consultation response has been taken into consideration in making the recommendations.			No	
Vision outcomes Please identify the appropriate Vision outcome(s) that this report relates or contributes to by putting a cross in the relevant box.			<u>1. Start Well</u>	☐
			<u>2. Live Well</u>	☐
			<u>3. Age Well</u>	☐
			<u>4. Prosperous</u>	☒
			<u>5. Clean and Green</u>	☐
			<u>6. Strong and Distinctive</u>	☒

1. **Introduction and Background**

- 1.1. The Gambling Act (Act) received royal assent in April 2005. It consolidated the regulation of casinos, bingo, gaming machines, lotteries, betting, and remote gambling into one Act.
- 1.2. The Act established a non-departmental public body, the 'Gambling Commission'. The Gambling Commission is responsible for advising both central and local government on issues relating to gambling.
- 1.3. The Gambling Commission issues operating licenses to organisations (required for operating gambling premises) and personal functional licences to individuals. A personal functional licence is required by an individual who performs any task that enables them to influence the outcome of gambling or receives payment of money in connection with gambling, such as a dealer or croupier.
- 1.4. The Gambling Commission (under section 25 of the Act) issue guidance to licensing authorities on the discharge of their functions under the Act. This guidance deals primarily with matters intended to assist licensing authorities in the development of their 'Statement of Principles', which is commonly referred to as 'The Gambling Policy'. The guidance sets out the principles that must be applied by the licensing authority in exercising its functions under the Act.
- 1.5. Under the Act the Council is the Licensing Authority and is responsible for issuing premises licences, permits, and temporary use notices (premises where it's proposed that gambling should take place). The Licensing Authority has also continued to be responsible for the registration of small society lotteries.
- 1.6. Section 349 of the Act requires the Licensing Authority to review, consult and publish a Statement of Principles every three years. The Licensing Authority adopted the current Statement of Principles in 2022.
- 1.7. The Statement of Principles details the approach taken by the Licensing Authority in carrying out its functions under the Act, the standards expected of licence holders and applicants applying for premises licences, permits, and other permissions for example lottery registrations.
- 1.8. The Act has significantly transformed the gambling landscape with the rise of technology and online gambling services. In response, the Government initiated a comprehensive review of the Act. The Department for Culture, Media and Sport (DCMS) published its gambling [white paper](#) in April 2023, which set out the government's plans for modernising the regulation of the gambling sector. A series of key proposals specifically relating to the land-based gambling sector were outlined in the white paper, including measures to adjust outdated regulatory restrictions applying to the sector.
- 1.9. The gambling white paper contains over 60 proposed policy measures, to be delivered by a mixture of different stakeholders, making it a highly complex policy initiative. The policy measures have different timeframes and implementation processes, and potentially intersecting outcomes and impacts.
- 1.10. From 26th July to 4th October 2023, DCMS conducted a public [consultation](#) on these measures. Following analysis of the evidence submitted, the government intends to implement the following measures:
 - a) **Relaxation on casino rules:** allowing 1968 Act casinos to increase the number of their gaming machines to 80 if they meet the size requirements of a Small 2005 Act casino and allowing smaller 1968 Act casinos more than 20 machines, on a pro rata basis commensurate to their size, and permitting betting in all casinos.

- b) **Machines in arcades and bingo halls:** allowing a 2:1 ratio of Category B to Category C and D gaming machines in arcades and bingo halls, implemented on a device type basis.
- c) **Cashless payments on gaming machines:** removing the prohibition on the direct use of debit cards on gaming machines, subject to the introduction of appropriate player protection measures.
- d) **Introduction of a legal age limit of 18 for certain gaming machines:** protecting children and young people by banning anyone under the age of 18 from playing low stake Category D slot-style machines that pay out cash.
- e) **Licensing authority fees:** increasing the maximum chargeable premises licensing fees by 15%.

- 1.11. In July 2025, the DCMS introduced the first measures and relaxed the casino rules outlined at a) above. Both casino premises in Bolton have completed variations to their licences to enable them to benefit from the changes.
- 1.12. On 15th October, the DCMS launched a public consultation on its proposals to update the regulatory framework for Category D machines and Bingo Premises Licences. The consultation outlines proposals to make changes to stakes and prizes for Category D machines and to update the licensing framework for the bingo sector. The consultation closes at 23:59 on 9th January 2026 [Consultation on Category D gaming machines and licensing for bingo premises - GOV.UK](#)

2. **Report Details**

- 2.1. The current Statement of Principles marked the first time that a unified Statement of Gambling Principles has been collaboratively approved across Greater Manchester at a local level. These principles were developed by the ten Greater Manchester Local Authorities who took the opportunity to think differently about the potential impacts of gambling across the city region, with the shared aim of preventing and reducing the negative impacts of gambling on individuals, families, and communities.
- 2.2. As part of the innovative public service reform and population health agenda, Greater Manchester are working with partners across each of the districts to ensure that gambling is a safe and enjoyable activity for all who choose to take part. The priorities are:
 - Developing an understanding of gambling related harms;
 - Improving access to high quality treatment and support;
 - Supporting interventions to prevent gambling from becoming a harmful activity; and
 - Engaging with people and communities to co-design the work.

3. **Options**

- 3.1. The Council is required by statute to review and publish a Statement of Principles.
- 3.2. The Committee is asked to note the information contained in the report and to approve consultation on the Statement of Principles. The Statement of Principles is attached as a separate document at Appendix A. Appendix B outlines the sections and page numbers where changes are proposed (these are also highlighted in yellow in Appendix A). Details on the consultation and consultees are outlined in section 6 below.
- 3.3. Following conclusion of the consultation exercise, a further report summarising comments from consultees will be shared with the Committee.

- 3.4. Following consideration of the comments and any subsequent amendments to the Statement of Principles, the Committee will be asked to recommend to a future meeting of the Council that the Statement of Principles be adopted.

4. Impacts and Implications

4.1. Financial

- 4.1.1. The review of the Statement of Principles is a statutory requirement, and has no direct financial implications for the Council, other than officer and member time in conducting the review process.
- 4.1.2. There are no additional financial burdens placed on businesses because of the proposed amendments to the Statement of Principles.

4.2. Legal

- 4.2.1. The Gambling Act is prescriptive in terms of a review of the Statement of Principles. The proposals in the report are made in accordance with the Act.

4.3. HR

- 4.3.1. None.

4.4. Climate Change

- 4.4.1. None.

4.5. Information Governance

- 4.5.1. None.

4.6. Other

- 4.6.1. None.

5. Equality Impact Assessment (EIA)

- 5.1. Under the Equality Act 2010, the council has a general duty to have due regard to the need to:
1. **eliminate unlawful discrimination, harassment**, victimisation and any other conduct prohibited by the Act;
 2. **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
 3. **foster good relations** between people who share a protected characteristic and people who do not share it.
- 5.2. It is important to consider how the proposals contained within this report may impact positively or negatively on protected characteristics.
- 5.3. Due to the nature of the proposals, it is possible that there could be some adverse impact for the following groups: Age, Disability and Race/Ethnicity. This analysis is set out in more detail in the full EIA included at Appendix C.

6. Consultation and Engagement

- 6.1 The requirement to review the Statement of Principles is accompanied by a statutory requirement to formally consult. The normal consultees are outlined below, however the list can be broadened to include additional consultees who can provide further insights, for example Public Health.
- 6.2 Once the Committee has approved the consultation, Section 349 of the Act requires the Council to consult with the following groups:
- The Chief Officer of Police;
 - One or more persons who appear to the authority to represent the interest of persons carrying on gambling business in the Bolton area; and
 - One or more persons who appear to the authority to represent the interest of persons who are likely to be affected by the exercise of Bolton Council's functions under the Gambling Act 2005.
- 6.3 It's intended to consult on the proposed Statement of Principles as follows:
- The consultation and proposed policy will be published on the Council's website.
 - A communication will be sent to the following persons/organisations informing them of the consultation and directing them to the Council's website:
 - The Chief Officer of Greater Manchester Police;
 - Local Area Forums;
 - Companies who have betting, bingo and casino premises in the Bolton area;
 - Local Children's Safeguarding Partnership;
 - Gamcare and Gamblers anonymous;
 - Public Health.
- 6.4 It's proposed that a consultation period of 6 weeks is undertaken.

7 Vision 2030

- 7.1 The Vision 2030 Strategy highlights that the Council want businesses to work and invest in the borough, and through their corporate social responsibility maximise social value opportunities, whilst creating good inclusive and sustained employment across the system. Whilst striving for stronger, cohesive, more confident communities in which people feel safe, welcome, and connected. The proposals within this report contribute to this strategic council aim.

8 Recommendations

- 8.1 The Committee is recommended to:
- Consider the content of the report and approve consultation on the Gambling Act 2005 Statement of Principles.

Appendix B

Statement of Principles 2026 -2029

Where there are proposed changes to the Statement of Principles 2022-2025, the sections and page numbers are provided below (these are also highlighted yellow in the Statement of Principles 2026-2029 attached at Appendix 1). There have also been minor amendments to the Statement of Principles to correct spelling errors, etc., these are not included below or in Appendix 1.

Section	Subsection	Page Numbers
1. Forword	N/A	4
2. Introduction	2.13	6
	2.15 to 2.30	7
3. General Principles	3.6	10
	3.12 to 3.19	11
	3.51	17
5. Relevant Factors When Considering Applications And Reviews	5.3 & 5.4	21
	5.7	22
	5.11 to 5.13	23
	5.17 to 5.20	24
	5.29	26
	5.32	26
	5.34	27
	5.36	27
	5.48	29
7. Permits And Other Permissions	7.2	35
9. Appendix 2 – Template For Data Collection		40
10. Appendix 3 – Glossary		43

APPENDIX C: Equality Impact Assessment

Initial Screening for relevance: Details of Impact (Part 1)

Directorate:	Place		
Section:	Regulatory Service – Licensing Unit		
Person completing this form:	Patricia Clyne – Licensing Manager	Date:	22 September 2025

Title of report or proposal:		Report Number	
Gambling Act 2005 Statement of Principles		46321	
Brief details of proposal, including the aims, objectives and purpose (all strategies, policies, reviews, projects, existing proposals, etc will be referred to as 'proposal'):			
The Statement of Principles sets out Bolton Council's approach to regulating gambling premises under the Gambling Act 2005. It outlines how the Council will promote the three licensing objectives: • Preventing gambling from being a source of crime or disorder. • Ensuring gambling is conducted fairly and openly. • Protecting children and other vulnerable persons from harm or exploitation. This report seeks political approval to consult on the new policy. The policy demonstrates a strong commitment to equality and safeguarding, particularly for children, young people, and those vulnerable to gambling-related harm. It aligns with Bolton's strategic priorities to reduce inequality and promote public health. Continued monitoring and engagement will be essential to ensure the policy remains inclusive and responsive.			
'Proposal' status (please tick)	Proposed / New	☐	Existing (i.e.: routine re-commission) (If an EIA has previously been completed please include the date) 08/08/2022
Bolton Council Led	☒	Partner Led (Please attach partner EIA, and complete section 3 - EIA sign off sheet, as screening not needed)	N/A

Public sector bodies need to be able to evidence that they have given due regard to the impact and potential impact on all people with 'protected characteristics' in shaping policy, in delivering services, and in relation to their workforce.

Under the Equality Act 2010, the council has a general duty to have due regard to the need to:

1. **eliminate unlawful discrimination, harassment**, victimisation and any other conduct prohibited by the Act;
2. **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
3. **foster good relations** between people who share a protected characteristic and people who do not share it.

By completing the following questions, the three parts of the equality duty will be consciously considered as part of the decision-making process.

Details of the outcome of the Equality Impact Assessment must also be included in the main body of the report.

Initial Screening for relevance: Details of Impact (Part 1)

Which stakeholder groups will potentially be impacted?									
Residents	☒	Partners	☐	Workforce	☐	Service users	☐	Businesses	☒
CVS Sector	☒	Members	☐	Other	Children and young people, visitors to Bolton				

Anticipated Negative Impacts														
Protected Characteristics / Groups	N/A	Age	Armed Forces	Care Leavers	Caring Status	Disability	Gender Reassignment	Marriage / Civil Partnership	Pregnancy & maternity	Race	Religion / Belief	Sex	Sexual Orientation	Socio-economic
1) Will the 'proposal' potentially present any challenges / barriers to any protected groups?	☐	☒	☐	☐	☐	☒	☐	☐	☐	☒	☐	☐	☐	☐
2) Will any group be potentially excluded as a result of implementing your 'proposal'?	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
3) Does the 'proposal' have the potential to worsen existing discrimination or inequality?	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4) Will the 'proposal' have a potential negative impact on community / partnership relations?	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

Anticipated Positive Impacts														
Protected Characteristics / Groups	N/A	Age	Armed Forces	Care Leavers	Caring Status	Disability	Gender Reassignment	Marriage / Civil Partnership	Pregnancy & maternity	Race	Religion / Belief	Sex	Sexual Orientation	Socio-economic
5) The 'proposal' could potentially reduce known inequalities, promoting equality of outcome or opportunity.	☐	☒	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☒
6) The 'proposal' has the potential to support inclusion and engagement from protected groups.	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
7) The 'proposal' has the potential to foster good relations between people.	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
8) The proposal could reduce the potential for harassment or discrimination.	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
Consultation / engagement / research findings	Local Demographics: Bolton has a diverse population of over 300,000, with areas of high deprivation and health inequality. Gambling Profile: Includes 28 betting shops, 6 adult gaming centres, 4 bingo premises, and 2 casinos. Public Health Data: 1,800 adults in Bolton are estimated to experience problem gambling. 18,300 residents are affected by gambling-related harms. 994 children live in households with adults needing high-intensity gambling support. - Gambling harms disproportionately affect people in deprived areas and those facing multiple disadvantages.													

Brief bullet point summary of positive / negative impacts:
High Impact: Age – Young people are more vulnerable to gambling

Disability – Mental health conditions are linked to gambling harm	
Race – Racial discrimination may increase vulnerability	
Details of any cumulative impact	N/A

Decision:

* All reports to the Executive Member which propose a new policy / procedure or are a savings review should continue to undertake a full EIA (part 2).

No major adverse impact identified, therefore a full EIA is not required (complete sign off sheet in section 3 and send to your Departmental Equalities Lead)	☐
Impacts identified in screening process, therefore a full EIA is required.	☒
This is a new policy, business improvement review or savings review, therefore a full EIA is required.	☐

Equality Impact Assessment

Full EIA (Part 2)

Directorate:

Place

Section:

Regulatory Services

Person completing full EIA:

Patricia Clyne

Date:

08 October 2025

Stakeholders involved in the development of the 'proposal' and how they are involved: (please list)

Consultation proposed with:

- Responsible Authorities (e.g., GMP, Fire Service, Children's Safeguarding).
- Gambling operators and trade bodies.
- Greater Manchester Gambling Harm Reduction Programme.
- General public via the Council's consultation webpage.

1) Impact to protected characteristics (only list the impacts & mitigations to those characteristics identified in the screening process).

a) Age

Summary of impact	Young people (16–24) are identified as particularly vulnerable.
Mitigations to remedy any identified adverse impact	The policy includes safeguards such as age verification, restricted access, and staff training. Local risk assessments are required for all premises, considering proximity to schools, youth centres, and vulnerable groups. Data Collection on interventions, exclusions, and incidents to monitor impact.

b) Armed Forces

Summary of impact	No direct impact identified.
Mitigations to remedy any identified adverse impact	N/A

c) Care Leavers

Summary of impact	No direct impact identified.
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Mitigations to remedy any identified adverse impact	N/A
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d) Caring Status

Summary of impact	No direct impact identified.
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Mitigations to remedy any identified adverse impact	N/A
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e) Disability

Summary of impact	Mental health conditions are linked to gambling harm.
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Mitigations to remedy any identified adverse impact	The policy encourages consultation with mental health advisors and provision of support materials. Local risk assessments required for all premises, considering proximity to schools, youth centres, and vulnerable groups. Consultation with Public Health on all premises licence applications is compulsory and promotion of support services such as GamCare, NHS Gambling Clinic, and local charities, is recommended.
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f) Gender Reassignment

Summary of impact	No direct impact identified.
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Mitigations to remedy any identified adverse impact	N/A
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g) Marriage / Civil Partnership

Summary of impact	No direct impact identified.
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Mitigations to remedy any identified adverse impact	N/A
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h) Pregnancy & Maternity

Summary of impact	No direct impact identified.
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Mitigations to remedy any identified adverse impact	N/A
i) Race	
Summary of impact	The policy notes that racial discrimination may increase vulnerability.
Mitigations to remedy any identified adverse impact	Multilingual signage and materials are recommended across the gambling industry
j) Religion / Belief	
Summary of impact	No direct impact identified.
Mitigations to remedy any identified adverse impact	N/A
k) Sex	
Summary of impact	No direct impact identified.
Mitigations to remedy any identified adverse impact	N/A
l) Sexual Orientation	
Summary of impact	No direct impact identified.
Mitigations to remedy any identified adverse impact	N/A
m) Socio-economic	
Summary of impact	The policy acknowledges that gambling harms are more prevalent in areas of high deprivation, and that gambling premises are often concentrated in these areas. It highlights that a quarter of residents who gamble report going without food due to lack of money. The estimated economic burden of gambling in Greater Manchester is £80 million, which includes costs related to health, crime, and social services.
Mitigations to remedy any identified adverse impact	The policy promotes early intervention, self-exclusion schemes, staff training to identify and support individuals at risk of financial harm, focuses on prevention and harm reduction, the policy aims to reduce these costs over time, benefiting the wider economy, encourages a more socially responsible gambling industry, which can contribute positively to local

employment and economic development without increasing harm, introduces better licensing controls, including consultation with public health organisations and community engagement

2) Does your proposal cause any adverse impacts to a protected group, where mitigations cannot be implemented?

- ☐ Yes: Please discuss this with your Directorate Equalities Leads before completing the sign off in section 3.
- ☒ No: this process is complete (complete sign off in section 3 and discuss with your Equalities Lead when you plan to review your EIA).

EIA - Sign Off

This EIA form and report has been checked and countersigned by the Directorate Equalities Officer before proceeding to Executive Cabinet Member(s)

Screening tool completed (please tick)	☐	Full EIA completed (please tick)	Yes	N/A
			☒	☐
EIA review date (if applicable).		N/A		

Please confirm the outcome of this EIA:

Positive impact for one or more groups justified on the grounds of promoting equality - proceed	☐
No major impact identified, therefore no major changes required – proceed	☐
Adjustments to remove barriers / promote equality (mitigate impact) have been identified – proceed	☒
Continue despite having identified potential for adverse impact/missed opportunities for promoting equality – this requires a strong justification	☐
The EIA identifies actual or potential discrimination - stop and rethink	☐

Report Officer	
Name:	Patricia Clyne
Date:	08 October 2025
Directorate Equalities Lead Officer	
Name:	Tammy Tatman – Service Improvement Manager
Date:	13/10/2025