

Report of the Strategic Director Place, to the meeting of Corporate Overview & Scrutiny to be held on 21 March 2019

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Subject:

GAMBLING IN THE BRADFORD DISTRICT

Summary statement:

The Committee is asked to consider the prevalence of problem gambling and gambling related harm within the district and development of the Council's approach to problem gambling.

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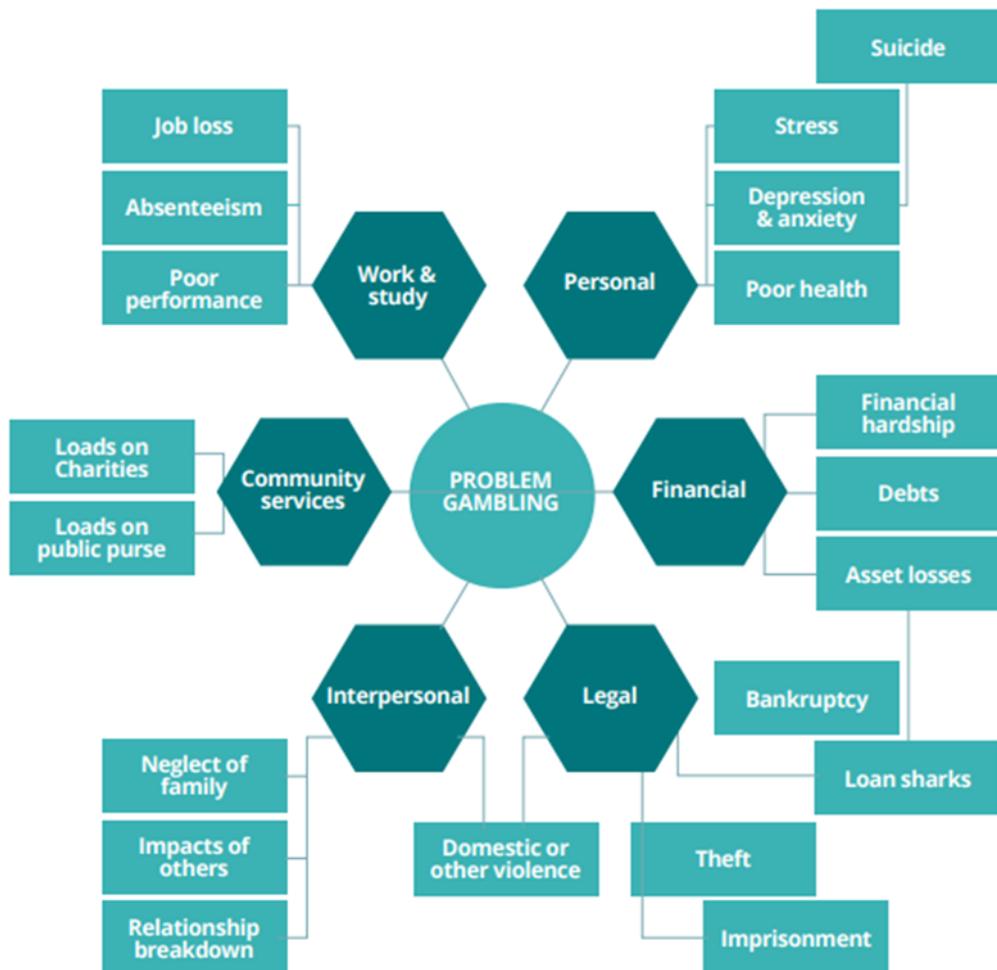
Portfolio:
Neighbourhoods and Community Safety
Healthy People and Places

Overview & Scrutiny Area:
Corporate

1. SUMMARY

Gambling is an activity which the majority of people can participate in without experiencing problems or risk of harm. However, some people can experience difficulties with their gambling behaviour. Problem gambling or gambling related harm can affect many different areas of an individual's life, but impacts are also wider than the individual concerned.

The impacts of harmful gambling on those who are gambling and their wider social networks and society can be illustrated as follows:



Source: Thorley et al, 2016

The organisation Gambling with Lives (www.gamblingwithlives.org), gives some of the following key facts:

- There are 430,000 adult gambling addicts in the UK, with a further 2 million "at risk".
- 55,000 young people aged 11-16 are addicted to gambling.
- Research in the UK and Hong Kong found that 4-11% of suicides were related to gambling, equivalent to 250-650 deaths per year in the UK.

- 27.9% of people gambling online are addicted or at risk .
- The industry made nearly £14 billion gross profit in 2015/16, but contributed just £8m to pay for research, education and treatment.
- Only 2% of addicts were able to access treatment, compared to 15-20% for drugs and alcohol addictions.
- The GamCare treatment network is not linked to the NHS, so 90% of those who receive treatment are self-referrals.

The Committee is asked to consider the prevalence of problem gambling and gambling related harm within the Bradford district and development of the Council's approach to problem gambling.

2. BACKGROUND

2.1 Gambling regulation

The Gambling Act 2005 was introduced to modernise and consolidate legislation and create a comprehensive system for gambling regulation. The Act came into force late 2007.

Bradford Council reviewed and adopted a district gambling policy, known as a Statement of Licensing Principles, in January 2019.

Further information relating to the regulation of gambling under the Gambling Act 2005 and the Statement of Licensing Principles is attached at Appendix 1.

2.2 Current gambling provision in the district

Premises

Gambling can take place through a range of methods, such as betting in gambling premises (arcades, bookmakers, bingo and casino premises), taking part in lotteries and using gaming machines.

There are currently 83 gambling premises in Bradford. The total number of current licences and permits in force in the Bradford district are as follows:

Gambling Premises	Active licence as at 01/02/2019
Casino	3
Bingo	4
Betting Shop / Bookmakers	61
Adult Gaming Centre	14
Track Betting	1
Gaming Permits	
2 or less gaming machines (automatic entitlement for pubs)	200 (approx.)
3 or more gaming machines permit (for pubs)	31
Club gaming or gaming machine permit	70

Gambling premises are often clustered in deprived neighbourhoods, near sources of credit such as payday lenders. This particularly impacts those who may already be financially excluded.

A map of the district showing the index of multiple deprivation and location of gambling premises is attached at Appendix 2.

In the Bradford district, 32.5% of lower super output areas (LSOA's) fall into the most deprived decile based on the national benchmark of index of multiple deprivation. There are 83 betting shops in Bradford district of which 37 (44.5%) are located in a LSOA in the most deprived decile and 65 (78.3%) are located in a LSOA which is in the top three most deprived deciles.

Online

In addition to this, most types of gambling are now accessible remotely. Online gambling websites have made it more accessible for people to gamble and players can access gambling sites from mobile devices or computers anywhere and at any time.

Online gambling, which is regulated by the Gambling Commission, is more strongly associated with problem gambling as it is outside of the environment and control of licensed premises. Online gambling can be done in private and can lack scrutiny from others.

With online gambling, bank accounts are easily accessible, making it much more likely that gamblers will impulse bet. Many sites also offer 'free to play' versions of their games, where members can play with pretend money. The promise of free bets also tempts online gamblers to set up accounts.

It is easy to set up more than one account with an online gambling site. These sites cannot do much to prevent problem gamblers from accessing their games. Even if the player has voluntarily restricted their own access, they can simply set up another account by using a different debit or credit card. Alternatively, they can sign up at another gambling site.

2.3 Understanding problem gambling and related harm

The Local Government Association's publication on tackling gambling related harm defines 'harmful gambling' as any type of repetitive gambling that disrupts or damages personal, family or recreational pursuits. At risk gamblers are defined as people who are at higher risk of experiencing negative effects due to their gambling behaviour.

Gambling Commission Participation Survey

In September 2018 the Gambling Commission published the latest combined health survey which outlines participation, at-risk gambling and problem gambling rates across Great Britain.

The data, from field research carried out in 2016, shows that the rate of problem gambling across Britain was 0.7%. The key figures from the report are:

- *1.2% of gamblers were classed as problem gamblers (0.7% of the population) – this is statistically stable, and consistent with both 2012 and 2015 reports*
- *2.4% of people were classed as low risk gamblers, and 1.1% of people as moderate risk gamblers.*
- *57% of adults (aged 16 and over) in Great Britain had gambled in the past year – this is down by 6% compared to 2015.*
- *Men (62%) are more likely to participate in gambling than women (52%).*
- *Gambling participation (excluding National Lottery draws only) was highest among 25 – 34 year olds.*

In February 2018 the Gambling Commission published the 2017 Gambling Participation Annual Report, which includes information relating to online gambling behaviour. The key figures from the report are:

- *97% of online gamblers play at home.*
- *Individuals aged under 35 are more likely to gamble outside of the home.*
- *39% of gamblers use a mobile phone to gamble, which is an increase of 10% from 2016.*
- *22% of online gamblers aged 18-24 gamble at work.*

In relation to the incidence and frequency of young people gambling, the survey also found that:

- *12% of 11-16 year olds had spent their own money on gambling in the past week (down from 16% in 2016), making gambling arguably a more common risky behaviour than smoking or drinking.*
- *The most prevalent forms of gambling in the previous week were fruit machines (4%), private bets with friends (3%) and national lottery scratchcards (3%).*
- *Young people who had gambled in the previous week spent on average £10 during that period.*

Online gambling on games and apps has fewer restrictions, giving children a route to become involved in gambling at an early age. This trend coincides with an increase in gambling on smartphones, as well as playing games with gambling elements. Young people are also being primed to gamble passively via the advertising industry, with gambling adverts appearing on the television at all times of the day, reaching younger audiences than appropriate (BBC News, 2018).

Leeds Beckett University – Problem Gambling in Leeds (2016)

In 2016 a four month study into problem gambling in Leeds was undertaken by Leeds Beckett University.

The study found higher rates of problem gambling occur in more Northern areas, major urban areas and those living in wards classified as industrial, traditional manufacturing, prosperous and multi-cultural. The study estimated more than twice the problem gambling prevalence in Leeds compared to national averages.

Growing evidence from this and other studies has identified 'at risk' groups who are more likely to experience problems:

- Younger people, including students
- Adults living in constrained economic circumstances
- People from minority ethnic groups
- Homeless people and those living in areas of greater deprivation
- Adults with mental health issues and substance abuse disorders
- People with poorer intellectual functioning and learning disabilities
- Offenders and ex-offenders
- Immigrants

2.4 Estimated prevalence of problem gambling in the Bradford district

National estimates suggest the prevalence of problem gambling is anywhere between 0.6% and 1.8% of the population, suggesting between approximately 2500 and 7000 people in Bradford would be classed as problem gamblers.

	Leeds estimates Adults 18+ years	Bradford estimates (based on Leeds) Adults 18+ years
Problem Gambling	1.8% 10,000	1.8% 7,077
At risk gambling	5-6% 30,000	5-6% 19,659-23,591
Problem and at risk gambling	7-8%	7-8% 27,523- 31,455

2.5 Current support provisions in the district

Treatment services

The current treatment system for problem gambling for adults is commissioned through Gambleaware and Gamcare. Specialist support for gambling is provided through the GamCare Helpline including support, advice and signposting.

There is no NHS or council funded specialist treatment services for problem gambling in Bradford.

The only locally provided specialist service is Krysallis in partnership with GamCare who provide talking treatments via face to face, telephone and online. Krysallis also offer aftercare sessions. Krysallis deliver weekly sessions in Bradford at the Gumption Centre and Bradford Counselling Services on Dale Street, Bradford.

The latest figures provided by Krysallis for service use in Bradford show the service worked with between 100 and 150 individuals and families a year for the last three years. The service currently reports having capacity to work with many more.

Year	Number of clients
2017/18	143
2016/17	157
2015/16	106

There are national services open to Bradford residents which can be accessed through the Gamcare helpline including Residential Rehabilitation and an NHS hosted Consultant Psychiatrist led clinic in London.

The Northern Problem Gambling Clinic which will open in April 2019 in Leeds will provide services for people with severe gambling problems through an NHS hosted service which will be offered by Leeds and York Foundation Trust with Gamcare.

There is a local offer of mutual aid through both Gamblers Anonymous and Smart Recovery who offer support groups in Bradford. Gamblers Anonymous (a 12 step programme) is a fellowship meeting specific to gambling. Smart Recovery is open for any type of addictive or compulsive behaviour.

Self exclusion schemes

Self-exclusion is a facility for those that have decided that they wish to stop gambling for at least six months and wish to be supported in their decision to stop. Once a person has made a self-exclusion agreement with a gambling company, that company must close the account and return any money in the account. It must also remove the persons name and details from any marketing databases.

It is up to the customer to stick to the self-exclusion agreement, but if a person tries to gamble during that time, the gambling business should take reasonable steps to prevent them from doing so.

All companies that offer gambling in licensed premises (arcades, bookmakers, bingo and casinos) must be part of a multi-operator self-exclusion scheme. This allows a person to make a single request to self-exclude from all premises offering the same type of gambling in a particular area, rather than the customer needing to exclude from each operator individually.

A multi-operator self-exclusion facility is being developed for online gambling companies, called GAMSTOP. The first phase of GAMSTOP includes a large number of online gambling websites (but not all) and is now available for consumers to sign up to. Early registration will provide consumers with exclusion from those operators currently participating in the scheme with a single request.

2.6 Tackling gambling related harm

Whole council approach

In July 2018 the Local Government Association and Public Health England published guidance for local authorities; Tackling gambling related harm – a whole council approach.

This document states harmful gambling is increasingly cited as a public health issue which requires a broad response and no single measure is likely to be effective on its own in addressing it. All Councils have a role to play in relation to harmful gambling. Suggestions include:

1. *Development of a local area profile: These are designed to enable an authority to identify where there are greater or specific risks of gambling related harm within a given area.*

Bradford does not currently have a Local Area Profile in place and this is identified as an important area for development.

There is no mandatory requirement, but the Gambling Commission state there are a number of benefits including greater clarity for operators in order to mitigate local risks and encouragement of a proactive approach to risk.

2. *Work with gambling businesses: Licensing authorities can work proactively to support businesses to meet the Gambling Commission's licensing conditions and codes of practice (LCCP) and set out best practice expectations.*
3. *Compliance and enforcement work: Use compliance work to help ensure that gambling premises are fulfilling their social responsibility requirements, looking at issues relating to harmful gambling such as staff training, records of refusals and management of self-exclusion schemes.*

Licensed gambling premises are inspected on an annual basis using an inspection proforma developed by the Gambling Commission. Inspections cover adherence to premises licence conditions and the social responsibility codes of practice. In general, no major issues are identified and very few complaints are received regarding licensed premises.

4. *Planning authority role: Update local plans to include planning policies relating to betting shops and other gambling premises.*

Bradford does not have any explicit policies relating to betting shops or other gambling premises. The Council's Core Strategy includes a retail and centres policy which seeks to support appropriate uses in centres. Betting shops are treated as 'sui Generis' under planning control which limits permitted development rights requiring betting premises to obtain planning permission.

Development of local frameworks

Both Leeds and Sheffield councils are currently developing a framework for gambling related harm reduction which include the following areas of work:

- Raising the profile of harmful gambling via a communications campaign to highlight the impact of harmful gambling; working with schools and promoting the help and support available to people who are struggling with their gambling habits.
- Supporting people at risk of harmful gambling by raising the awareness of frontline staff of the support that is available.
- Understanding and measuring harmful gambling in the district to inform future licensing decisions.

- Work with other Councils to identify action to reduce the risks that consumers, especially those that are vulnerable, face from gambling e.g. enhanced consumer protection for online gambling.

Gambling Commission briefing

In February 2018 the Gambling Commission published a briefing paper for local authorities setting out why gambling harm should be considered a public health issue. A summary of the recommendations are as follows:

- *Local public health teams recognise gambling-related harm as a public health issue and its relevance in assessing risk to the wellbeing of their communities.*
- *Public health engages strategically to inform the work of their licensing authorities and in particular the review of the gambling Statement of Principles and the local area profile.*
- *Awareness of gambling problems and their symptoms is raised with front line health professionals and other agencies where problem gamblers may present themselves eg debt advice.*
- *Develop pathways to accredited agencies for gambling support services*
- *Given the multiple and interrelated areas of interest, public health works with Safeguarding Boards (young and vulnerable to maximise effective delivery.*

3. OTHER CONSIDERATIONS

3.1 Social Responsibility Codes of Practice

All operators must comply with the Gambling Commission's social responsibility code of practice. As part of this operators must have in place policies to promote socially responsible gambling and reduce the risk of, and identify, problem gambling. This includes:

- Provision of information on gambling responsibly to players.
- Ensure staff interact with customers where there are signs of problem gambling.
- Consideration given to the appropriate layout of premises.
- Self-exclusion schemes must be in place so those who wish to are prevented from participating in gambling.

3.2 Co-Morbidity

Several studies show there appears to be significant co-morbidity of problem gambling with other addictions and mental health conditions, i.e. conditions which are known to occur alongside problem gambling.

This highlights the importance of local services working with mental health and other addictions to be alert for the signs of problem gambling and to proactively screen for problem gambling.

4. FINANCIAL & RESOURCE APPRAISAL

Under the Gambling Act 2005, licensing authorities must determine their own fees for premises licence applications within fee bands set by the Secretary of State. Fees for permits and small lotteries are set by the Secretary of State. Fees must be set upon the basis of full cost recovery, including the cost of administering the licence system, processing applications, and seeking compliance. There is no provision to set fees to cover any other matter such as treatment services.

In relation to public health, local authorities are not funded to provide treatment services. There is a recognised role to identify harm and that people experiencing harm are enabled into support and treatment.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

There are no apparent risk management or governance issues.

6. LEGAL APPRAISAL

Under the Gambling Act 2005, Council's (known as Licensing Authorities) are responsible for the licensing of gambling premises and certain gambling activities. Licensing authorities are bound by the statutory aim to permit where applications are in accordance with the Gambling Commission's codes of practice, guidance to authorities, the Authority's Statement of Principles and the three licensing objectives.

In deciding whether or not to grant the licence the Council may not have regard to the expected demand for the facilities which will be provided if the licence is granted.

In relation to public health, the Care Act 2014 imposes a requirement on a local authority to "make enquiries if it has reasonable cause to suspect that an adult in its area, whether or not ordinarily resident there, has needs for care and support, is experiencing, or is at risk of, abuse or neglect, and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it"

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

The Council has to comply with the public sector general equality duty in section 149 Equality Act 2010, when exercise its functions.

The broad purpose of the equality duty is to integrate consideration of equality and good relations into the day-to-day business of public authorities. It requires equality considerations to be reflected into the design of policies and the delivery of services

7.2 SUSTAINABILITY IMPLICATIONS

No apparent sustainability implications.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

None

7.4 COMMUNITY SAFETY IMPLICATIONS

The licensing objectives of addressing crime and disorder, ensuring gambling is conducted fairly and protecting children and vulnerable people must be addressed by the licensing authority when exercising statutory functions.

7.5 HUMAN RIGHTS ACT

The Council must consider Human Rights implications when establishing licensing policy.

7.6 TRADE UNION

None

7.7 WARD IMPLICATIONS

Problem gambling and gambling related harm can affect anyone at any time. However, studies have shown gambling behaviour and problem gambling are not equally distributed across England, with higher rates for those living in wards classed as 'industrial, traditional manufacturing and multi-cultural'.

7.9 IMPLICATIONS FOR CORPORATE PARENTING

The protection of children and other vulnerable persons from being harmed or exploited by gambling is one of the licensing objectives which authorities must have regard to when exercising statutory functions.

7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

None

8. NOT FOR PUBLICATION DOCUMENTS

None

9. OPTIONS

Options available in order to develop the Council's approach to problem gambling and related harm include:

- 1) Development of a Local Area Profile to identify areas of greater or specific risks of gambling related harm in the district, within an agreed timeframe.
- 2) Following development and approval of a Local Area Profile, produce a framework in order to raise awareness of gambling related harms, awareness of support organisations and available treatment and referral pathways.

10. RECOMMENDATIONS

The views of the Committee on the options set out in Section 4 of this report are requested.

11. APPENDICES

1. Gambling regulation and policy information
2. Map of index of multiple deprivation decile and gambling premises in the district

12. BACKGROUND DOCUMENTS

- Gambling Commission Guidance to Licensing Authorities (Sept 2015)
- Statement of Licensing Principles for the Bradford District 2019-2021
- Local Government Association Tackling Gambling Related Harm (July 2018)
- Gambling Commission Gambling related harm as a public health issue (Feb 2018)
- Leeds Beckett University Problem Gambling in Leeds (2016)
- NatCen Social Research Gambling behaviour in Great Britain in 2016 (published Sept 2018)

Regulation under the Gambling Act 2005

The Gambling Act 2005 was introduced to modernise and consolidate legislation and create a comprehensive system for gambling regulation. The Act came into force late 2007.

The Act established a national regulator; the Gambling Commission, which is responsible for the granting of operating and personal licences and publishing industry codes of practice. The Commission also has a statutory duty to advise the Secretary of State on gambling matters, including the effects of gambling.

Local Councils, acting as ‘Licensing Authorities’ under the Act, are responsible for licensing of non-remote gambling. This is through the licensing of gambling premises and issuing of gambling permits. When exercising functions, licensing authorities must have regard to the three licensing objectives prescribed in the Act:

- Preventing gambling from being a source of crime or disorder, being associated with crime and disorder or being used to support crime.
- Ensuring gambling is conducted in a fair and open way.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The Gambling Act places a legal duty on licensing authorities to ‘aim to permit’ gambling. Authorities must approach their functions in a way that seeks to regulate gambling by using their powers to moderate its impact on licensing objectives, rather than starting out to prevent it altogether.

Statement of Licensing Principles

Under the Gambling Act, licensing authorities are required to adopt a policy document, referred to as a Statement of Licensing Principles. The statement sets out the basic principles of the authority’s approach to dealing with applications for licences and permits under the Act.

Bradford’s Statement of Principles was reviewed in 2018 and, following a public consultation exercise, the 2019-2021 statement was adopted by full Council in December 2018.

During the 2018 review, information specific to public health concerns was added, which included information from a research exercise into problem gambling in Leeds, undertaken in 2016 by Leeds Beckett University.

A copy of the policy document is available on the Council’s website at www.bradford.gov.uk/licensing

Index of multiple deprivation (IMD) decile overlaid with locations of betting premises

