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Subject: Consultation Response: gambling policy review

Dear colleagues,

I'm writing below the formal response from Bradford Public Health department to the consultation on gambling policy. If you have any questions about any of the responses below, please come back to me. I'll email separately about working together more closely, including potentially providing Public Health representation to licencing panels.

Public Health response to gambling consultation

We are generally supportive of the draft licencing policy. There are areas we would like to see a more challenging approach taken, and some terminology which we would like to see reframed. Recent surveys have shown that public opinion is strongly in favour of more restrictions on gambling operators, meaning that a robust approach to licencing would be supported by many in the district. If advertising of gambling within the district could be included in the scope of this document, we would welcome a conversation separately about this.

Comments I have made are highlighted in yellow, with direct quotes highlighted. Red highlights are words which I have picked out from quoted passages.

2.2 The Licensing Authority recognises the important role that well regulated, varied and safe entertainment can play in promoting the vitality and viability of the district's city, town and village centres, particularly the evening economy. It is also aware that tastes and trends change over time and that, in the light of increasing competition within the entertainment industry, any licensing system must be sufficiently flexible and responsive to new initiatives from the licensing industry and individuals.

2.2 The Licensing Authority takes a positive approach to the licensing and regulation of events and betting and gaming establishments and will take care to help businesses, event organisers and others meet their legal obligations without unnecessary expense. However, the Licensing Authority will take firm action, including prosecution where appropriate, against those who flout the law or act irresponsibly

This reads as a positive endorsement of gambling premises in Bradford – I would want to see a much stronger acknowledgement of the significant harms caused by gambling, and the commitment of Bradford council to protect the health and wellbeing of our residents by ensuring that gambling premises are not licenced in high concentrations within areas more accessible to vulnerable communities

4.3 Overall, in making decisions about premises licences and temporary use notices, the Licensing Authority's general approach will be to aim to permit the use of premises for gambling in so far as is appropriate and:

- in accordance with any relevant codes of practice issued under the Act;
- in accordance with the guidance issued by the Gambling Commission;
- in accordance with this Statement of Licensing Principles; and
- is consistent with achievement of the licensing objectives.

Can we also add "where the use of premises for gambling does not expose the public to gambling-related harm, or the widening of inequalities as a result of gambling-related harm"

5.3 If an application for a licence or permit is received in relation to premises which are in an area noted for particular problems with organised crime, the Licensing Authority will, in consultation with the police or other relevant Responsible Authority, consider whether specific controls need to be applied to prevent gambling in those premises from being a source of crime and/or disorder,” or whether the potential negative consequences are too great to allow a licence or permit to be granted.”

6.4 Further guidance and assistance to help a service provider meet the general needs of disabled customers and in meeting the requirements of the Equality Act is available from the Equality and Human Rights Commission website at www.equalityhumanrights.com. “This includes the protection of people more vulnerable to gambling-related harms from the risks of gambling, including those with learning disabilities. For example, information on gambling risks must be provided in ways which are accessible to all customers.”

7.7 The Licensing Authority does not seek to prohibit particular groups of adults from gambling, in the same way that it seeks to prohibit children, but it will assume for regulatory purposes, that “vulnerable persons” include: • People who gamble more than they want to; • People who gamble beyond their means; • People who may not be able to make an informed or balanced decision about gambling due to a mental illness or impairment, learning disability, or intoxication by alcohol or drugs

7.10 In 2016 Leeds Beckett University researched problem gambling in Leeds (Problem Gambling in Leeds; Kenyon, Ormerod, Parsons and Wardle, 2016). This research looked specifically at identifying groups of society that could be considered vulnerable to problem gambling:... this should be updated with new research, including the new Public Health England review of gambling: [Gambling-related harms: evidence review - GOV.UK \(www.gov.uk\)](http://www.gov.uk). I’m happy to help with this.

...Minority ethnic groups – There is evidence that individuals from Asian or Black backgrounds are more vulnerable to gambling problems (Wardle, 2015). This should be rephrased, e.g. “There is evidence that gambling-related harms disproportionately affect people from Asian or Black backgrounds”

There are a number of British surveys that have consistently shown that those living in more deprived areas are more likely to experience problems with their gambling behaviour.... rephrase to “There are a number of British surveys that have consistently shown that those living in more deprived areas are more likely to experience gambling-related harm”.

Little is known about why rates of problem gambling among homeless population groups is higher than the general population but given associations with other mental health conditions, homeless people should be considered a vulnerable group. I would remove the phrase “given associations with other mental health conditions” – homelessness is not a mental health condition, and should be considered a vulnerable group in its own right given the financial/ health/ stigma inequalities faces by homeless people, as well as the fact that gambling premises might be used as a “safe”, warm space to rest.

8.2 Gambling is a legitimate leisure activity enjoyed by many and the majority of those who gamble appear to do so with enjoyment, and without exhibiting any signs of problematic behaviour. There are however significant numbers of people who do experience significant harm as result of their gambling. I would reframe this: “Gambling is an activity undertaken by a significant number of adults. The extent of gambling-related harm (sometimes called “problem gambling”) is not yet fully

understood. However there is evidence that those who are already vulnerable and at risk of poor health are more at risk of gambling-related harms, further exacerbating existing inequalities.”

8.3 For these problem gamblers, harm can include higher levels of physical and mental illness, debt problems, relationship breakdown and, in some cases, criminality. It can also be associated with substance misuse. Reframe: “For “problem gamblers”, harm includes higher levels of physical and mental illness, debt problems, relationship breakdown and tragically, in some cases suicide. Criminality may also occur for some people experiencing significant harm.”

8.4 There can also be considerable negative effects experienced by the wider group of people around a gambler. The health and wellbeing of partners, children, and friends can all be negatively affected. Reframe: “It is estimated that for every gambler that experiences harm, around six other people in their life, most often close family members including children, are negatively affected.”

8.5 Therefore the Licensing Authority considers that Public Health teams, whilst not a responsible authority under the Act, can still assist the Licensing Authority to address gambling-related harms in its area. Replace “still assist” with “work collaboratively with”

8.6 The Licensing Authority will therefore engage with the local Public Health team in the further development of this Statement of Principles and the Local Area Profile. It is planned that the Public Health team will be able to help the Licensing Authority: • Identify and interpret health data and evidence to inform the review of • the Statement and develop locally tailored local area profiles. • Make decisions that benefit and protect the health and wellbeing of local communities. • Be clear on issues which they can have regard to when deciding on • licenses for a wide range of gambling activities. • Conduct a health-impact assessment of gambling in the local area or assess any existing information. Replace “help” with “work jointly”. Sorry I’m not sure what the sentence “be clear on issues...” means. I would also go further and request that Public Health sit on licencing panels for gambling premises.

9.5 i. add the proximity of schools and other places which might be frequented by children to the list for local risk assessment

ii. Add the provision of information warning people about the harms of gambling, ensuring it is in accessible language and format.

iv. • The provision of signage and documents relating to games rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality – maybe change to: “The provision of signage and documents relating to games rules, the risks of gambling, gambling care providers and other relevant information be provided in both English and the other prominent first languages for that locality, in easily understandable and accessible language and format.”

15. How can we pass a “no casino” resolution, and are there reasons why we haven’t done so?

Best wishes,
Sarah

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