

Sent by Email

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14<sup>th</sup> September 2018

Torfaen CBC Licensing Team  
Neighbourhoods, Planning and Public & Protection  
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NP4 0LS

Dear Sir/Madam

**RE: Consultation on the revision of Statement of Policy on the Gambling Act 2005**

On behalf of the Aneurin Bevan University Health Board (ABUHB), I commend Torfaen County Borough Council's comprehensive revision of Statement of Policy on the Gambling Act 2005. ABUHB support the updates to the previous Statement, but recommend that the following sections of the Statement be strengthened:

1. Location of premises when conducting risk assessments

ABUHB has considered the Welsh Government Chief Medical Officer (CMO) for Wales's Annual Report 2016/17: '*Gambling with our Health*' which includes the following key messages:

- The proximity to gambling facilities correlates with increased participation in gambling
- The density of gambling outlets is linked with greater gambling-related harm
- The greatest problems and harms from gambling are experienced by the poorest of our society, with those members of the public living in low

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income households spending a higher proportion of their income on gambling, betting more than they can afford and experiencing financial problems as a result of gambling

- The location of gambling venues is not random, with a greater clustering of gambling facilities in areas of social deprivation.

**ABUHB recommends** that the primary consideration of any new gambling premise application, after considering the applicant themselves, be the geographical location of the premise, and that consideration be given to the above key messages in the risk assessment.

## 2. Licensing Objective – Protection of Children and other vulnerable persons from being harmed or exploited by gambling

ABUHB has considered evidence on identifiable population groups more vulnerable to gambling related harm, in addition to children and young people. Specific details of these vulnerable groups are outlined in the CMO's Annual Report 2016/17 (detailed above) and in the NatCent Social Research report, prepared on behalf of the Gambling Commission, in 2017: '*Gambling behaviour in Great Britain in 2015 Evidence from England, Scotland and Wales*'.

**ABUHB recommends** that explicit reference is made to a wider range of environmental conditions which evidence indicates increase the likelihood of gambling related harm, and that these conditions are considered for all new gambling applications. ABUHB acknowledge that some of these conditions are listed in the Statement, but recommend that local partners work together to identify a list of environmental conditions/local venues which are specific to Torfaen County Borough Council, after considering the findings from national reports and local intelligence. This information could be included within a 'local location policy' and/or as an appendix of the Statement. ABUHB's Public Health team can provide partners with a list of groups vulnerable to gambling related harm based on published national research.

The co-occurrence of alcohol and gambling is well documented and referenced in key national documents (including the CMOs Annual Report and several Gambling Commission briefing papers), and **ABUHB recommends** that the location of venues of alcohol licensed premises is also considered when completing the above exercise.

**ABUHB recommends** the inclusion of staff training to include procedures for identifying customers who are at risk of gambling within the Statement, to specify the following content:

- the risks of gambling related harm
- how to identify problematic gamblers
- where to signpost people for support

ABUHB is aware of training available locally from Newport Citizens Advice Bureau's (CAB) Gambling Project, which is referenced as good practice in national documents, as well as nationally, from GambleAware. **ABUHB recommends** that Torfaen County Borough Council considers specifying in the

Statement that training is to be provided by a recognised provider of good quality training.

ABUHB are aware Newport CAB's Gambling Project has promotional material, which is freely available and can be provided to all gambling establishments. **ABUHB recommends** the inclusion of promotional material being clearly displayed within local gambling establishments to direct people to sources of help for problem gambling as a condition in the statement

The harm to health from gambling is a growing problem and ABUHB welcomes the opportunity to work in Partnership with Torfaen County Council to strengthen our joint efforts to address the problem together.

Yours faithfully

A handwritten signature in black ink, appearing to be 'SA', written over a light blue horizontal line.

**Dr Sarah Aitken MBBS FFPH**  
**Executive Director of Public Health/Cyfarwyddwr Iechyd y Cyhoedd**

## **Summary of Recommendations from ABUHB**

**Recommendation 1:** ABUHB recommend that 'location of the premise' is clearly specified in the Statement as the primary consideration of any new gambling licence, until the location policy is developed, and Statement updated. In particular:

- (i) Is the premise located in an area of deprivation?
- (ii) AND is the premise located within an existing clustering of gambling premises?

**Recommendation 2:** Until a full list of local environmental conditions is identified and the Statement updated, the ABUHB recommend that the following wording is included in the current Statement as a priority:

- (iii) *"The consideration of the proximity of gambling premises to locations where groups vulnerable to problematic gambling may congregate, e.g. schools, alcohol services, supported housing, will be a priority for the applicant and licensing authority".*

**Recommendation 3:** ABUHB recommend that the consideration of the location of alcohol licensed premises plays a greater role when considering gambling applications, and that the 'location of premises licensed to sell/supply alcohol' be specified in the Statement as a key consideration for gambling licence applications.

**Recommendation 4:** ABUHB recommends that information in the Statement includes additional training within the 'conditions' section, as detailed above, which is standardised across Gwent and regularly reviewed/updated.

**Recommendation 5:** ABUHB recommend that the Statement includes a proviso that all gambling premises clearly promote **local** and national support services – in particular Newport CAB Gambling Support Services and GambleAware.