

Gambling Policy: Public Health Response

The policy is written in legalistic terms which makes it difficult understand the likelihood of being able to influence decisions on gambling premises if you are not trained in law. The language can appear to be quite weak by using words such as “may”, which means it is open to interpretation and debate. In other areas the policy is written in plain English.

The Gambling Commission have stated that it is important licensing authorities should use this opportunity to ensure operators offer the best possible protections for consumers, particularly those who are young and vulnerable to harm. It appears that the policy generally adheres to the guidance by the Gambling Commission. The London Authorities have also provided guidance on a Whole Council approach to gambling

<https://www.londoncouncils.gov.uk/sites/default/files/Gambling%20and%20Public%20Health%20%282%29.pdf>

The Public health team recognise that problem gambling is complex that impacts on individuals, families and communities. The Gambling Policy statement is a key tool that can be used to protect residents from the negative impacts associated with problem gambling. The licensing statement, backed up by local area profiles provides an opportunity to set out how gambling will be regulated in Bristol.

Gambling related harm is defined as

“The adverse financial, personal and social consequences to players, their families and wider social networks that can be caused by uncontrolled gambling”

Problem gambling is a hidden public health issue. It can have profoundly negative effects upon, not only the individual, but also families, friends and social relationships. It can have a wider impact on society through crime and disorder, debt, domestic violence and lost productivity. It is estimated that there are around 373,000 problem gamblers in England. (2015 Health Survey for England) This estimate is likely to be conservative as the survey does not include certain population groups more likely to be vulnerable to harm. This is a relatively new area for public health and the evidence will continue to grow. The local area profile should change to reflect this.

Local Area Profile

The Gambling Commission have issued guidance on the importance of the development of an effective local area profile. Good local area profiles will increase awareness of local risks and improved information sharing, to facilitate constructive engagement with licensees and a more coordinated response to local risk. The local area profile can be reviewed and updated to reflect changes to the local landscape. The local area profile should take account of a wide range of factors, data and information held by the Licensing Authority and its partners. The Local Area Profile should also help inform specific risks that operators will need to address in their own risk assessment.

Bristol City Council has produced ward profiles and an online dataset of profile to assist operators complete their risk assessment. One way it might be possible to strengthen the data is to add Gambling premises to this GIS system.

<http://maps.bristol.gov.uk/pinpoint/> This would allow the licensing team to review where there is a clustering of gambling premises and when they are located to schools and other vulnerable locations.

Manchester and Westminster₁ have tested out a new approach that recognises that not everyone with a certain characteristic will experience harm if they gamble, but rather they may have an elevated risk of harm because of their characteristics or circumstances. They have developed a risk-based, probabilistic approach to understanding vulnerability. Amongst the groups where the evidence base for vulnerability is strongest are the following:

- Some ethnic groups e.g. Asian/Asian/British, Black/Black British and Chinese
- People who are unemployed
- Young people
- Substance misuse
- People with poor mental health

This is an interesting approach and worth reviewing its developments.

Objective 1 Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder to being used to support crime.

We welcome the inclusion of the crime prevention measures such as location of the premises and training given to staff in crime prevention measures.

The local area profile provides information on levels of crime within the area and we welcome crime prevention being included in the risk assessment.

Objective 2 – Ensuring that gambling is conducted in affair and open way

No comments on this section

Objective 3 Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The section on children and young people needs to be strengthened to ensure that both children and young people are protected by the Act.

Definition of children and young people: The statement could read, “For the purposes of this section, protection of children will encompass both child and young person as defined by the Act.”

It needs to be made more explicit the council will pay particular attention of any codes of practice which the Gambling Commission issues as regards this licensing object. At present there are extensive requirements set out for operators.

Location of services

We welcome the consideration of location of premises in the gambling policy particularly proximity to schools. I would also state this should also include higher education establishments as they are included within the definition of children and young people.

The vulnerable person locations could be strengthened to include homeless shelters, substance misuse and mental health facilities.

The Local Area Profile could include a map of these facilities to make it clear the facilities that are considered vulnerable.

References

1. Wardle H, Astbury G, Thurstain-Goodwin M, Parker S ("016) Exploring area-based vulnerability to gambling-related harm: Developing the gambling related harm risk index <http://www.geofutures.com/research-2/gambling-related-harm-how-local-space-shapes-our-understanding-of-risk/>