

Appendix A

For the attention of Mark Marshall  
South Ribble Council

Phone: 01772 539865  
Email: Matthew.Stanton@lancashire.gov.uk

Date: 17 October 2018

Dear Mr Marshall,

**Re: Gambling Licence Policy Review: Statutory Public Health Advice**

I am writing to provide relevant Public Health advice to assist South Ribble Council as a licensing authority in reviewing and consulting on your Gambling Act 2005 'Statement of Principles'.

Problem gambling is undoubtedly a public health issue. Numerous reports from organisations such as the Gambling Commission<sup>1</sup>, Public Health England and the Local Government Association<sup>2</sup> recognise that problem gambling is associated with higher levels of physical and mental illness, debt problems, relationship issues, substance misuse and even criminality. It is also established that certain population groups are more vulnerable to the negative impacts of problem gambling than others.

I recognise that the licencing function of a local authority should not duplicate responsibilities of the planning function, therefore on matters of planning permission and local plan policies we will be advising planning teams separately.

My advice pertains primarily to the Gambling Act 2005's third licencing objective: "protecting children and other vulnerable persons from being harmed or exploited by gambling". Having studied the available evidence and conducted a brief policy review, I would like to make the following recommendations.

**1. Define geographic areas of vulnerability and risk**

Although it is up to the operator to identify risks and suggest control measures, the licencing authority can provide information on what they perceive as being a localised risk. I recommend that licencing authorities utilise the available data to determine which communities within their district have a heightened vulnerability and risk, this information is contained in the appendix.

---

<sup>1</sup> <https://www.gamblingcommission.gov.uk/for-licensing-authorities/Licensing-authority-toolkit/Public-health-and-Safeguarding-toolkit.aspx>

<sup>2</sup> <https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach>

## 2. Provide guidance on local risk assessments

I recommend that the licencing authority sets clear guidelines to operators on categories of risk. Information on the key areas of risk and vulnerability are also covered within the appendix.

The Gambling Commission states that existing risk assessments should be updated following a significant change in local circumstances, however as they do not set out what constitutes a significant change, I would recommend that an updated risk assessment should be triggered if:

- The local area is classified or declassified by the Licensing Authority as being an area of heightened risk within its Statement of Licensing Principles.
- Any new pay day loan or pawn brokers open in the local area
- New educational facilities or other facilities for young people start to operate within in the local area. For example the building of a new school or college.
- The police advice the Licensing Authority that they have identified the area as a crime hot spot.
- New venues relating to vulnerable groups are opened in proximity to gambling premises (e.g. additional homeless hostels or gambling or mental health care/support facilities are opened in the local area).

I would also advise you to direct operators towards the Responsible Gambling Trust's guidance for reducing harm: Operator-Based Approaches to Harm Minimisation in Gambling<sup>3</sup>. The document contains details of appropriate control measures for dealing with a variety of risks.

## 3. Ask operators to publicise pathways to treatment

I also recommend that licencing authorities request operators to clearly publicise their self-exclusion schemes and provide information on national and local services and groups who offer support relating to gambling addiction and debt. A range of support services are available through the Gamcare website: [www.gamcare.org.uk](http://www.gamcare.org.uk) and information on local support groups can be found through the Gamblers Anonymous website: [www.gamblersanonymous.org.uk](http://www.gamblersanonymous.org.uk).

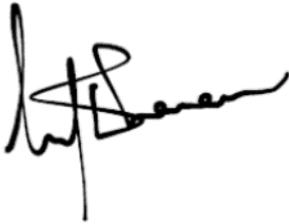
---

<sup>3</sup> <https://about.gambleaware.org/media/1177/obhm-report-final-version.pdf>

Appendix A

I hope you find this advice useful when reviewing your Statement of Principles, I have include more detail on each of the recommendations within the appendix below. If you require further advice then please contact Matthew Stanton, Public Health Practitioner ([matthew.stanton@lancashire.gov.uk](mailto:matthew.stanton@lancashire.gov.uk)).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sakthi Karunanithi', written in a cursive style.

Dr. Sakthi Karunanithi MBBS MD MPH FFPH  
Director of Public Health, Lancashire County Council  
[Sakthi.Karunanithi@lancashire.gov.uk](mailto:Sakthi.Karunanithi@lancashire.gov.uk)

## Appendix A

**Appendix****1. Define geographic areas of vulnerability and risk**

I recommend that licencing authorities look at the available data to determine which wards within their district have a heightened vulnerability and risk, this determination should be based on the following indicators:

- Deprivation<sup>4</sup> – and the income, employment and crime domains of deprivation
- Proximity to schools and other facilities frequented by children and young people
- Proximity to services treating gambling addiction, substance misuse
- Proximity to homeless hostels
- Proximity to Foodbank locations<sup>5</sup>
- Density of existing gambling outlets, pawnbrokers and pay day loan outlets

**2. Provide guidance on local risk assessments**

Operators should be advised to include the following categories of risk in their risk assessments and be signposted to the available data:

<b>Category</b>	<b>Indicators</b>
Children and young people	Locations of schools, youth clubs and parks Density of population 0-24 ( <a href="http://www.localhealth.org.uk">www.localhealth.org.uk</a> )
Problem gamblers seeking treatment	Location of local support services and groups if any exist
Financial difficulties	<a href="#">Economic deprivation</a> Local payday loan companies Local food banks
Substance abuse/misuse	Local treatment services Alcohol related hospital admissions ( <a href="http://www.localhealth.org.uk">www.localhealth.org.uk</a> )
Unemployment	<a href="https://www.nomisweb.co.uk/">https://www.nomisweb.co.uk/</a>
Homelessness	Locations of homeless shelters
Minority ethnic groups	<a href="http://www.localhealth.org.uk">www.localhealth.org.uk</a>

<sup>4</sup> <https://www.lancashire.gov.uk/lancashire-insight/deprivation/indices-of-deprivation-2015/>

<sup>5</sup> <http://feedinglancashiretogether.yolasite.com/food-banks-and-food-projects.php>

