

Appendix D

Consultation Responses:

- Gamcare
- GambleAware
- Hertfordshire Safeguarding Adults Board
- Local Planning Authority
- Hertfordshire Public Health



GamCare's response to Stevenage Borough Council – Consultation on the revision of statement of principles under the Gambling Act 2005

About GamCare:

GamCare is an independent charity and the leading provider of information, advice, and support for anyone affected by gambling harms. We operate the National Gambling Helpline, provide structured support for anyone harmed by gambling, and create awareness about safer gambling and treatments. For 26 years, our confidential, non-judgemental services, have supported more than half a million people to get their lives back on track.

We hold data locally and nationally through our National Gambling Helpline. We also work closely with those who have lived experience in shaping and delivering our services and programmes, ensuring that all our work is coproduced with our lived experience community at its heart.

GamCare's comments on the revision of the statement of principles:

- We welcome the position Stevenage Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles.
- Local authorities can play a greater role in reducing gambling harm, particularly for those of our clients who experience harm in land-based gambling venues, due to council's licensing responsibilities.
- It is vital that Stevenage Council develops a local picture of the level of gambling harms, in order to best target resources and tailor service provision. This could be achieved by gathering data from the National Gambling Helpline, as well as those already providing services in the area.
- Building on the proactive approach the council is already taking, we were pleased to see Stevenage Council commit in its statement of principles to a **public health approach** to gambling.
- This commitment should include training frontline and primary care staff to recognise the signs of gambling harm and develop referral pathways to the National Gambling Helpline or local treatment providers. GamCare has worked with Haringey Council to implement a similar system, that has received widespread support.
- In the absence of Cumulative Impact Assessments as a method by which the "aim to permit" approach can be challenged, Stevenage Council should continue to pursue a [Local Area Profile](#) approach that specifically analyses gambling risk, and use this data as a basis from which to scrutinise and possibly oppose a licensing application.
- The changes to Stevenage Council's statement of principles should be viewed in the context of the Gambling Act Review and subsequent process of white paper consultations, so take account of the rapidly changing regulatory environment.



*If you have any questions or would like to discuss in more detail, please contact Pollyanna Hopkins,
Senior External Affairs Officer: pollyanna.hopkins@gamcare.org.uk*

Julie Dwan

From: Info <info@gambleaware.org>
Sent: 24 October 2024 12:39
To: Julie Dwan
Subject: [External] RE: Consultation on the revised Statement of Principles for Gambling (2025-2028)
Categories: To Do

Hello Julie,

Thank you for consulting us.

You may find GambleAware's recently published [interactive maps](#) useful, which have been designed for use by local authorities. The maps show the prevalence of problem gambling severity in each local authority and ward area as well as usage of, and reported demand for, treatment and support for gambling harms.

GambleAware also strongly commends two publications by the Local Government Association which set out the range of options available to local authorities to deal with gambling-related harms using existing powers:

- <https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach>
- <https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales>

GambleAware is also fully supportive of local authorities which conduct an analysis to identify areas with increased levels of risk for any reason. In particular we support those who also include additional licence requirements to mitigate the increased level of risk. Areas where there are higher than average resident or visiting populations from groups we know to be vulnerable to gambling harms include children, the unemployed, the homeless, certain ethnic-minorities, lower socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services

Charlotte
Project Support Officer
Pronouns: She/Her

GambleAware

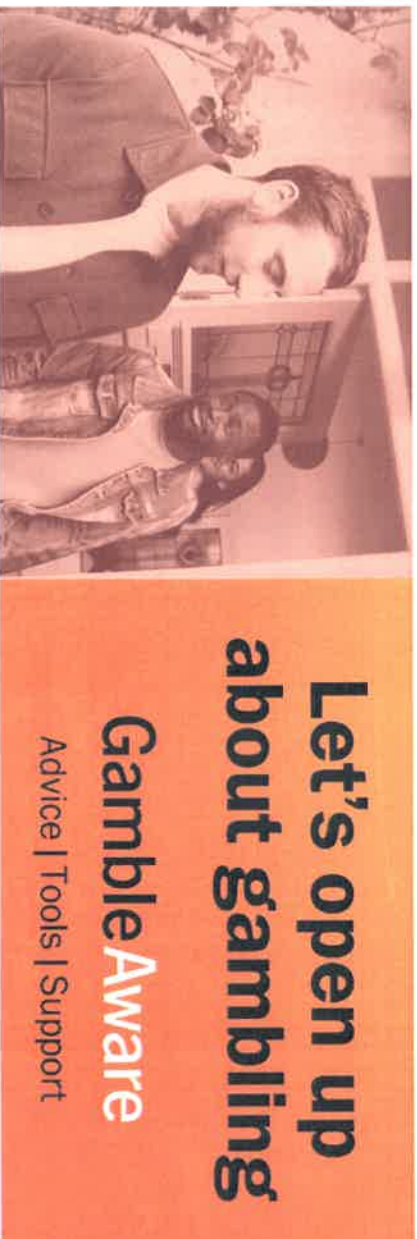
5th Floor, Lincoln House, 296-302 High Holborn, WC1V 7JH

For information/advice & corporate info: gambleaware.org

For confidential support and treatment: National Gambling Helpline 0808 8020 133

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From: Julie Dwan <Julie.Dwan@stevenage.gov.uk>

Sent: 23 October 2024 15:37

Subject: Consultation on the revised Statement of Principles for Gambling {2025-2028}

CloudTech24 couldn't recognize this email as this is the first time you received an email from this sender. Julie.Dwan@stevenage.gov.uk

You don't often get email from julie.dwan@stevenage.gov.uk. [Learn why this is important](#)

Dear Sir or Madam

Julie Dwan

From: Innocentia Dogbatse <Innocentia.Dogbatse@hertfordshire.gov.uk> on behalf of Admin HSCP <Admin.HSCP@hertfordshire.gov.uk>
Sent: 23 October 2024 16:53
To: Julie Dwan
Subject: RE: Consultation on the revised Licensing Policy Statement
Attachments: HSCP Gambling Policy Statement.docx

Hello,

Thank you for your email. Please find attached HSCB Gambling Policy Statement.

Thank you.

Kind regards,

Innocentia Dogbatse
Business Support Officer

Hertfordshire Safeguarding Adults Board

Safeguarding Boards Business Unit

Farnham House, Six Hills Way Stevenage, SG1 2FQ

Post Point Address: CH0116, County Hall, Pegs Lane, Hertford, SG13 8DQ

Telephone number: 01438844655

Commet: 54186

Email address: innocentia.dogbatse@hertfordshire.gov.uk

Website: www.hertfordshire.gov.uk/HSAB

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Hertfordshire

Safeguarding Adults Board

Working together to prevent abuse

Hertfordshire Safeguarding Children Partnership– Gambling Policy Statement

The Safeguarding Children Partnership is nominated by the Council under section 157 of the Gambling Act 2005 as being the appropriate body to advise [insert name] Borough Council of any risks posed by the operation of premises providing gambling facilities to children and young people.

The activity of gambling can be harmful to people of all ages, but the law prohibits anyone under the age of 18yrs from gambling due to the significant harm that it can cause them.

The HSCP recognises that certain issues in relation to the protection of children from gambling are considered or regulated at a national level, for instance rules relating to advertising, general rules on access to premises and the availability of online gambling.

HSCP role is to focus on activities carried out a local level from physical premises in the County. HSCP's concerns will relate to preventing or controlling access to gambling premises and preventing the act of gambling by children. Risk assessments should identify risks and have measures in place to mitigate them. HSCP would expect operators to not allow the inside of the premises to be viewed and not to carry advertising on the front of its premises that may be attractive to children or contain images of popular professional sportsmen or celebrities that are likely to make gambling attractive to children.

Where gaming machines are provided in settings which children can access, for instance in pubs, clubs or family entertainment centres, the HSCP will expect the location of machines to be situated in areas where access to them, or the area, is controlled, clearly identified and under the physical supervision of a member of staff at all times.

Operators should consider a challenge 25 policy and the keeping of records such as challenge or refusal registers that provide evidence of the suitability of the procedures.

HSCP will also consider the wider picture of safeguarding of children – it would not normally be the case that the authorities would expect children to be present in or outside premises that provide gambling facilities. HSCP would expect operators to risk assess this, include it as part of their training procedures and be alert to instances where children and young people are regularly seeking access to the premises, being found inside premises or waiting outside premise for money or gifts from an adult who is gambling within.

Julie Dwan

From: James Chettleburgh
Sent: 05 November 2024 15:57
To: Licensing
Subject: FW: Consultation on the revised Statement of Principles for Gambling

Dear Acting Licensing Manager,

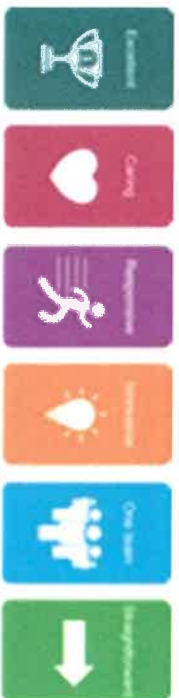
Consultation on the revised Gambling Act 2005 Statement of Principles.

I refer to your recent consultation dated 23rd October 2024 with respect to the Council's Gambling Act 2005 Statement of Principles (2025 – 2028). Thank you for giving the Council as Local Planning Authority the opportunity to provide comments on this statement. The only comment we wish to make is the post "Development Control Manager" as referenced on Page 61 has been replaced with the "Head of Planning and Enforcement". Can this be updated to avoid any communications relating to Licensing Matters being missed within the department in the future.

We have no further comments to make on the statement.

Yours sincerely,

James Chettleburgh MRTPI | Head of Planning and Enforcement | Development Management | Planning and Regulation | Stevenage Borough Council |
Daneshill House | Danestrete | Stevenage | SG1 1HN
Mob: 07593 528253 | Email: james.chettleburgh@stevenage.gov.uk





Our Privacy Policy has been updated to reflect changes to data protection legislation and can be viewed at the following link
<http://www.stevenage.gov.uk/privacy-policy>

Warning: all information provided on your planning application is now publicly available. Individuals and organisations offering their services may contact you. The Council does not endorse or approve any builders, surveyors, trades persons or other supplier, and advises householders to obtain quotes/references, and check the legitimacy of any contractor who contacts them before making payment.



Julie Dwan
Acting Licensing Manager
Stevenage Borough Council
Daneshill House
Danestrete
Stevenage
SG1 1HN

Email: licensing@stevenage.gov.uk

Director of Public Health
Sarah Perman
Hertfordshire County Council
Public Health Service
Farnham House
Postal point: SFAR232
Stevenage
Herts
SG1 2FQ

Email: Sarah.perman@hertfordshire.gov.uk

Date: 19/11/2024

Dear Julie,

Reference: **Gambling Act 2005 Statement of Principles Consultation**

Thank you for the opportunity to comment on the Gambling Statement of Principles consultation for Stevenage.

We are pleased to see the Gambling Statement of Principles includes a section on “Public Health and gambling” (6.10.13 – 6.10.18). Our response provides sources of evidence which it is recommended to include as references to evidence the harm caused by problem gambling.

Hertfordshire Gambling Harms Strategy and Joint Strategic Needs Assessment (JSNA)

Hertfordshire County Council will be launching its first Gambling Harms Strategy in early 2025. The 12-week public consultation for the strategy ran from 1st July – 22nd September 2024. 115 consultation responses were received. If you would like to receive the summary report, please contact PublicHealth@hertfordshire.gov.uk. One of the strategic priorities included in the strategy is “Influencing the licencing and regulatory environment” to protect vulnerable residents from the harm caused by gambling and be clear on the individual roles of the County Council and District and Borough Councils.

The Hertfordshire JSNA Briefing: Gambling-related harms¹ was published in February 2022. It provides a wealth of evidence which is recommended to be referred to in the Gambling Statement of Principles (and in particular paragraph 6.10.18).

¹ [gambling-related-harms-jsna-briefing-2022.pdf \(hertshealthevidence.org\)](#)

Harm caused by problem gambling

The harms associated with problem gambling are wide-ranging. These include not only harms to the individual gambler but their children, their families, and their communities. According to a YouGov data on gambling treatment and support from 2020² around 7% of the population of Great Britain (adults and children) were found to be negatively affected by someone else's gambling, most commonly from an immediate family member. The annual excess direct financial cost to government associated with harmful gambling is equivalent to £412.9 million. The annual societal value of health impacts is equivalent to between £635 and £1,355.5 million (in 2021 to 2022 prices). The total financial costs are approximated at £1.05 to £1.77 billion in 2023 nationally³.

Gambling-related harms can include the following:

- **Financial harms:** debt, bankruptcy, homelessness and child poverty
- **Relationships:** loss of trust, loneliness, separation, abuse
- **Mental and physical health:** depression, sleep problems, deaths from suicide
- **Employment and education:** unemployment, poor education
- **Criminal activity:** theft from family members and others

Gambling rates and density of gambling premises higher in areas of higher deprivation

[Data has been collected by Gamble Aware](#) for local authorities to have a clearer view on how the rates of gambling affected their population and how this compares nationally. The Problem Gambling Severity Index (PGSI) is a frequently used tool that helps to identify people experiencing problems or negative consequences from their gambling (problem & at-risk gamblers). This tool was specifically developed to be used in the general population rather than a clinical context. It has 9 questions and a possible score range of 0 to 27. A PGSI score of eight or more represents a person who is gambling at risky levels and is set as a common threshold for clinical diagnosis. Scores between three and seven represent 'moderate risk' gambling and a score of one or two represents 'low risk' gambling. For the 10 districts in Hertfordshire, the estimates are as the following from their Annual GB Treatment and Support Survey 2022 (table 1):

Table 1: Estimates of prevalence of gambling behaviour, fiscal costs and % of people seeking help

District	Prevalence of gambling behaviour			Estimated Fiscal Cost	% of people seeking help		
	PGSI1+	PGSI3+	PGSI8+		PGSI1+	PGSI3+	PGSI8+
National	13.4%	5.9%	2.9%	NA	14.8%	32.1%	65.5%
Broxbourne	14.4%	6.3%	4.0%	£2.1 million	15.1%	32.7%	66.0%
Dacorum	13.7%	6.1%	3.3%	£3.6 million	14.1%	31.5%	61.0%
East Herts	12.0%	4.8%	2.1%	£2.2 million	12.2%	29.0%	63.8%

² [gambling-treatment-and-support.pdf \(gambleaware.org\)](#)

³ [Gambling-related harms evidence review: summary - GOV.UK \(www.gov.uk\)](#)

Hertsmere	13.0%	5.8%	2.6%	£1.9 million	14.6%	31.0%	66.6%
North Herts	12.5%	5.2%	2.5%	£2.2 million	14.3%	33.3%	68.4%
St Albans	12.1%	5.2%	2.4%	£2.5 million	13.3%	29.5%	64.0%
Stevenage	15.1%	6.3%	3.2%	£2.0 million	14.8%	32.9%	65.0%
Three Rivers	12.8%	5.5%	2.5%	£1.6 million	14.0%	30.8%	65.8%
Watford	15.1%	7.4%	3.9%	£2.6 million	19.6%	38.5%	71.4%
Welwyn Hatfield	13.8%	6.0%	3.0%	£2.6 million	15.8%	34.1%	66.0%

The data shows a total estimated fiscal cost of £23.3 million for Hertfordshire according to National Institute of Economic and Social Research (NIESR) for problem gambling (PGSI 8+) in 2023.

There are variable numbers of gambling premises in each district (table 2) and analysis in the Hertfordshire JSNA briefing: Gambling Related Harms⁴ showed that gambling premises clustered around areas with greater levels of deprivation. A commonly used unit of comparison is Lower Super Output Area (LSOA) which comprises between 400 and 1,200 households and have a usual resident population between 1,000 and 3,000 persons. In Hertfordshire, 41.0% of gambling premises were in LSOAs in the most deprived quintile of Hertfordshire whereas 2.56% of gambling premises were in LSOAs in the least deprived quintile of Hertfordshire.

Table 2: Type and total gambling premises by Hertfordshire district and rate of gambling premises per 100,000 adults aged 18 years and older by Hertfordshire district, September 2023⁵

District	Adult Gaming Centre	Betting Shop	Bingo	Total gambling premises	Premises per 100,000 adults aged 18+
Broxbourne	1	15	0	16	19.5
Dacorum	2	11	0	13	10.8
East Herts	0	13	0	13	11.1
Hertsmere	4	12	1	17	20.4
North Herts	1	9	0	10	9.5
St Albans	0	5	1	6	5.4
Stevenage	3	10	1	14	20.2
Three Rivers	0	6	0	6	8.3
Watford	1	15	2	18	22.9
Welwyn Hatfield	0	11	0	11	11.6
Hertfordshire	11	112	5	128	13.7
National (Mar 2023)	1348	5995	650	8301	15.7

⁴ [gambling-related-harms-jsna-briefing-2022.pdf \(hertshealthevidence.org\)](#)

⁵ Source: Full premises register, The Gambling Commission, 2022; ONS 2020 Mid-Year Population Estimates, HertsInsight. [JSNA](#))

Increased risks of suicide from problem gambling

The Hertfordshire Suicide Prevention Strategy for 2025-2030 is currently being refreshed with district health and environmental leads involved in the development. The England Suicide Prevention Strategy⁶ released in September 2023, contains actions related to gambling. There is a clear relationship between gambling, financial issues and mental health, leading to depression, anxiety and in more serious cases, suicide ideation, attempts and taking of one's own life. It is important that this impact is recognised. This further impacts on families through bereavement, domestic abuse and impact on children and loved ones. The Hertfordshire Suicide Prevention Strategy for 2025-2030 will include priorities to reduce the harm caused by gambling.

District's based on number of cases	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	2013-2022 Total per District
Dacorum	14	8	9	17	10	9	10	12	7	12	108
St Albans	11	7	10	13	14	6	8	8	11	7	95
East Herts	8	10	10	13	9	11	5	5	11	5	87
North Herts	12	7	6	11	10	11	9	4	12	4	86
Welwyn Hatfield	9	5	9	9	10	9	4	13	9	4	81
Hertsmere	7	5	11	15	8	10	5	7	6	3	77
Three Rivers	6	3	8	5	8	6	7	4	5	6	58
Broxbourne	7	6	4	6	13	5	3	11	4	3	62
Stevenage	6	3	7	11	8	3	5	4	2	1	50
Watford	1	2	3	5	12	6	8	6	4	7	54
Hertfordshire	81	56	77	105	102	76	64	74	71	52	758

Concerns about vulnerable people being harmed by gambling

Consideration for vulnerable people should be at the heart of licensing applications. This includes awareness of areas of deprivation and/or concentrated presence of children and young people (CYP) and other at-risk individuals within areas of a district.

CYP: While prevalence of gambling is lower in CYP, the rates are still alarming. The Young People and Gambling Survey (2019) found that the prevalence of problem gambling was 1.7% in a sample of 11-16 year olds and a further 2.7% were identified as at-risk gamblers. Around 11% had played a gambling game in the past 7 days (13% boys and 7% girls) and gambling participation was highest for placing a private bet for money (e.g. with friends) (5%) and fruit or slot machines (4%)⁷. There is also increased concern over online gaming and gambling in CYP, with the Gambling Commission's report on gambling in young people suggesting that there has been an increase in playing for loot boxes in video games. A

⁶ [Suicide prevention strategy for England: 2023 to 2028 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/114122/suicide-prevention-strategy-for-england-2023-to-2028.pdf)

⁷ [Health Survey for England 2018: Supplementary analysis on gambling - NHS England Digital](https://www.nhs.uk/health-survey-for-england-2018/supplementary-analysis-on-gambling/)

large-scale survey of 16- to -18-year-olds found a statistically significant link between loot box spending and problem gambling in older adolescents⁸.

Health/behaviour: Mental health conditions and behavioural characteristics are risk factors for gambling harms. These include depression, impulsive behaviour, low life satisfaction and wellbeing, high alcohol consumption, loneliness, violent and antisocial behaviour, and poor academic performance⁹.

Economic factors: Problem gambling is more frequent in those who are unemployed (2.1%) vs employed (0.7%) & those living in the most deprived quintiles compared to the least deprived (1.2% vs 0.2%). A survey found 42% of problem gamblers said they would gamble more over the next year due to the cost-of-living compared to 6% of the UK¹⁰.

Gender and age: Men are 4.2 times more likely to be harmful gamblers than women. Young to middle aged men have the highest prevalence of problem gambling⁹.

Ethnicity: Asian & British Asian groups have the lowest risk of gambling, but the highest risk of problem gambling. Ethnic minority groups are less likely to receive treatment for gambling harm¹⁰.

Homelessness and veterans: Studies indicate a link between homelessness and gambling; one survey found 11.4% of those experiencing homelessness reported problem gambling. One report suggested veterans were over 8 times more likely to be problem gamblers compared to non-veterans¹¹.

Assessing the cumulative impact

Hertfordshire Public Health recommends that section 6.12 (Location) includes that applications will be considered against the **cumulative impact** of applications locally to protect children and vulnerable persons from being harmed or exploited by gambling.¹²

We recommend the above noted points are included within the appropriate sections of the Gambling Statement of Principles.

If you have any questions, please do not hesitate to contact me.

Kind regards,

Sarah Perman
Director of Public Health
Public Health
Hertfordshire County Council

⁸ [Video game loot boxes are psychologically akin to gambling | Nature Human Behaviour](#)

⁹ [Gambling-related harms evidence review: summary - GOV.UK \(www.gov.uk\)](#)

¹⁰ [Gambling-related harms evidence review: quantitative analysis of gambling involvement and gambling-related harms among the general population in England \(publishing.service.gov.uk\)](#)

¹¹ [Rates of Problematic Gambling in a British Homeless Sample: A Preliminary Study | Journal of Gambling Studies \(springer.com\)](#)

¹² [Gambling regulation: Government Response to the Committee's Second Report - Culture, Media and Sport Committee \(parliament.uk\); committees.parliament.uk/writtenevidence/122415/pdf/](#)

