

Scrutiny Inquiry Panel - Reducing Gambling-Related Harms in Southampton

Thursday, 16th January, 2025
at 5.30 pm

PLEASE NOTE TIME OF MEETING

Conference Room 3 and 4 - Civic Centre

This meeting is open to the public

Members

Councillor Cooper (Chair)
Councillor Greenhalgh
Councillor Percival
Councillor Powell-Vaughan
Councillor Webb (Vice-Chair, in the Chair)

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PUBLIC INFORMATION

Role of Scrutiny Panel Inquiry –

Purpose:

To identify opportunities to improve outcomes for private sector renters in Southampton.

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Details of the Council's Guidance on the recording of meetings is available on the Council's website.

Southampton: Corporate Plan 2022-2030

sets out the four key goals:

- **Strong Foundations for Life.-** For people to access and maximise opportunities to truly thrive, Southampton will focus on ensuring residents of all ages and backgrounds have strong foundations for life.
- **A proud and resilient city -** Southampton's greatest assets are our people. Enriched lives lead to thriving communities, which in turn create places where people want to live, work and study.
- **A prosperous city -** Southampton will focus on growing our local economy and bringing investment into our city.
- **A successful, sustainable organisation -** The successful delivery of the outcomes in this plan will be rooted in the culture of our organisation and becoming an effective and efficient council.

Public Representations

At the discretion of the Chair, members of the public may address the meeting about any report on the agenda for the meeting in which they have a relevant interest.

Smoking policy – the Council operates a no-smoking policy in all civic buildings.

MOBILE TELEPHONES:- Please switch your mobile telephones or other IT to silent whilst in the meeting.

Fire Procedure – in the event of a fire or other emergency a continuous alarm will sound and you will be advised by Council officers what action to take.

Access – access is available for the disabled. Please contact the Democratic Support Officer who will help to make any necessary arrangements.

Dates of Meetings:

14 November 2024
19 December 2024
16 January 2025
13 February 2025
6 March 2025
8 May 2025

CONDUCT OF MEETING

Terms of Reference

The terms of reference of the Committee are contained in the Council's Constitution.

Business to be discussed

Only those items listed on the attached agenda may be considered at this meeting.

Rules of Procedure

The meeting is governed by the Council Procedure Rules as set out in Part 4 of the Constitution.

Quorum

The minimum number of appointed Members required to be in attendance to hold the meeting is 3.

Disclosure of Interests

Members are required to disclose, in accordance with the Members' Code of Conduct, **both** the existence **and** nature of any "personal" or "prejudicial" interests they may have in relation to matters for consideration on this Agenda.

Personal Interests

A Member must regard himself or herself as having a personal interest in any matter

- (i) if the matter relates to an interest in the Member's register of interests; or
- (ii) if a decision upon a matter might reasonably be regarded as affecting to a greater extent than other Council Tax payers, ratepayers and inhabitants of the District, the wellbeing or financial position of himself or herself, a relative or a friend or:-
 - (a) any employment or business carried on by such person;
 - (b) any person who employs or has appointed such a person, any firm in which such a person is a partner, or any company of which such a person is a director;
 - (c) any corporate body in which such a person has a beneficial interest in a class of securities exceeding the nominal value of £5,000; or
 - (d) any body listed in Article 14(a) to (e) in which such a person holds a position of general control or management.

A Member must disclose a personal interest.

Continued/.....

Prejudicial Interests

Having identified a personal interest, a Member must consider whether a member of the public with knowledge of the relevant facts would reasonably think that the interest was so significant and particular that it could prejudice that Member's judgement of the public interest. If that is the case, the interest must be regarded as "prejudicial" and the Member must disclose the interest and withdraw from the meeting room during discussion on the item.

It should be noted that a prejudicial interest may apply to part or the whole of an item.

Where there are a series of inter-related financial or resource matters, with a limited resource available, under consideration a prejudicial interest in one matter relating to that resource may lead to a member being excluded from considering the other matters relating to that same limited resource.

There are some limited exceptions.

Note: Members are encouraged to seek advice from the Monitoring Officer or his staff in Democratic Services if they have any problems or concerns in relation to the above.

Principles of Decision Making

All decisions of the Council will be made in accordance with the following principles:-

- proportionality (i.e. the action must be proportionate to the desired outcome);
- due consultation and the taking of professional advice from officers;
- respect for human rights;
- a presumption in favour of openness, accountability and transparency;
- setting out what options have been considered;
- setting out reasons for the decision; and
- clarity of aims and desired outcomes.

In exercising discretion, the decision maker must:

- understand the law that regulates the decision making power and gives effect to it. The decision-maker must direct itself properly in law;
- take into account all relevant matters (those matters which the law requires the authority as a matter of legal obligation to take into account);
- leave out of account irrelevant considerations;
- act for a proper purpose, exercising its powers for the public good;
- not reach a decision which no authority acting reasonably could reach, (also known as the "rationality" or "taking leave of your senses" principle);
- comply with the rule that local government finance is to be conducted on an annual basis. Save to the extent authorised by Parliament, 'live now, pay later' and forward funding are unlawful; and
- act with procedural propriety in accordance with the rules of fairness.

AGENDA

Agendas and papers are now available online at
www.southampton.gov.uk/council/meeting-papers

1 APOLOGIES AND CHANGES IN MEMBERSHIP (IF ANY)

To note any changes in membership of the Panel made in accordance with Council Procedure Rule 4.3.

2 DISCLOSURE OF PERSONAL AND PECUNIARY INTERESTS

In accordance with the Localism Act 2011, and the Council's Code of Conduct, Members to disclose any personal or pecuniary interests in any matter included on the agenda for this meeting.

NOTE: Members are reminded that, where applicable, they must complete the appropriate form recording details of any such interests and hand it to the Democratic Support Officer.

3 DECLARATIONS OF SCRUTINY INTEREST

Members are invited to declare any prior participation in any decision taken by a Committee, Sub-Committee, or Panel of the Council on the agenda and being scrutinised at this meeting.

4 DECLARATION OF PARTY POLITICAL WHIP

Members are invited to declare the application of any party political whip on any matter on the agenda and being scrutinised at this meeting.

5 STATEMENT FROM THE CHAIR

6 MINUTES OF THE PREVIOUS MEETING (INCLUDING MATTERS ARISING) (Pages 1 - 8)

To approve and sign as a correct record the minutes of the meeting held on 19 December 2024 and to deal with any matters arising, attached.

7 PRIMARY PREVENTION (Pages 9 - 20)

Report of the Scrutiny Manager informing the Panel that, in accordance with the inquiry plan, the focus of the third meeting of the inquiry will be on the importance of primary intervention, taking action to prevent the onset of at-risk gambling behaviour, either through whole population measures or those targeting vulnerable groups.

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Scrutiny Inquiry Panel - Reducing Gambling-Related Harms in Southampton

MINUTES OF THE MEETING HELD ON 19 December 2024

Present: Councillors Cooper (Chair), Greenhalgh, Percival and Webb (Vice-Chair)

Apologies: Councillors Powell-Vaughan

4. **Apologies and Changes in Membership (if any)**

The apologies of Councillor Powell-Vaughan were noted.

5. **Minutes of the Previous Meeting (including matters arising)**

RESOLVED: that the minutes for the Panel meeting on 14 November 2024 be approved and signed as a correct record.

6. **A whole-place approach to reducing gambling related harms**

The Panel noted the report of the Scrutiny Manager and considered the information provided by the invited guests which would be used as evidence in the review.

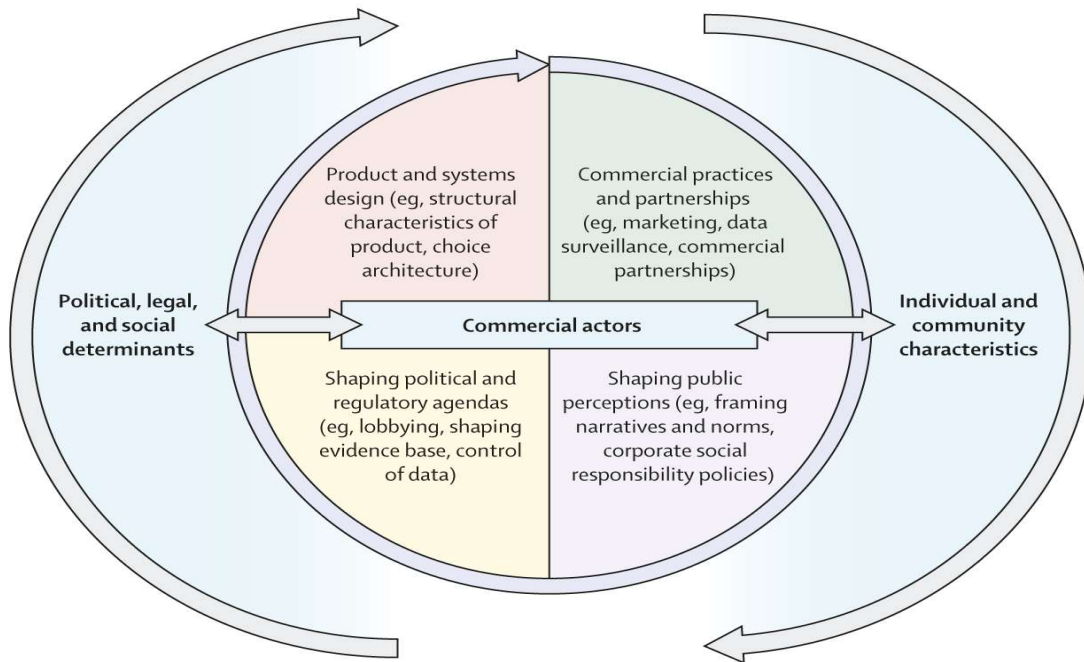
Summary of information provided:

1) Gambling harms - a whole system based approach to preventing harms – Professor Heather Wardle, Professor of Gambling Research and Policy at the University of Glasgow.

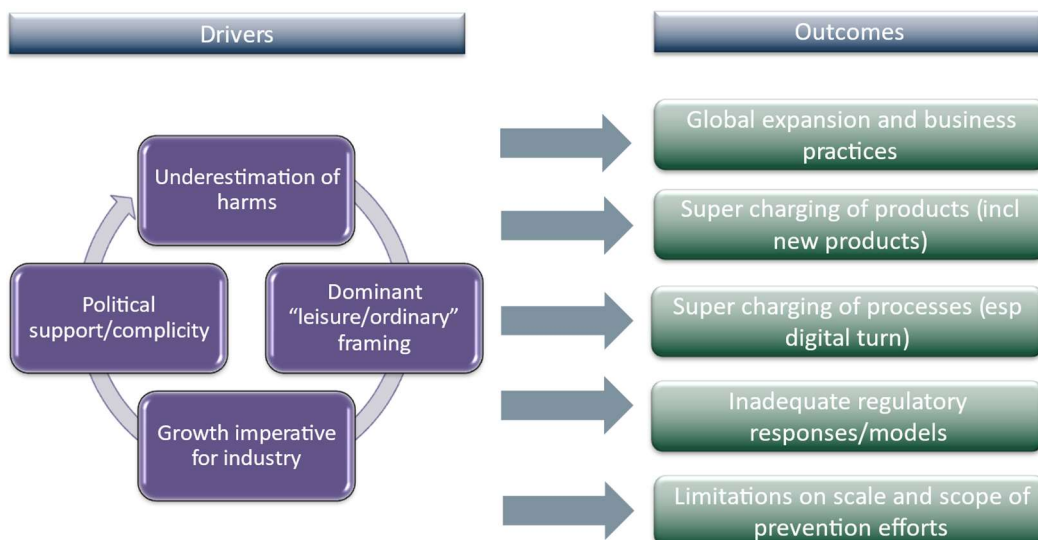
- A presentation was delivered by Professor Heather Wardle, outlining the importance of implementing a whole system based approach to preventing gambling harms.

Key points raised in the presentation included:

- Determinants of gambling and gambling harms:

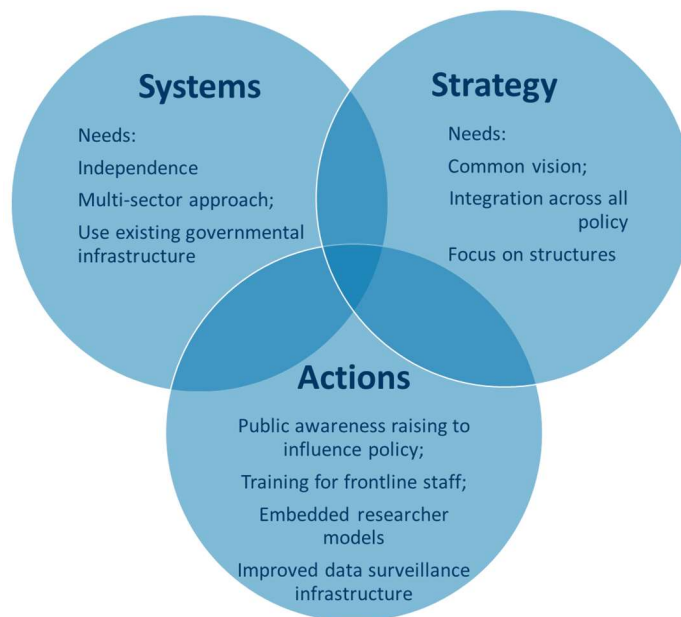


- Systematic reframing of gambling as leisure and allowing industry to use same practices for promotion and marketing as other leisure commodities – despite it being health harming. Estimate that between 1% - 5% of people in nations globally experience gambling disorder and many more experience harms; especially including affected others – you can experience harms from gambling without being a disordered gambler – relates to the nature of the product and the experience.
- Harms paradox evidence – those from certain socio-economic or demographic backgrounds are far less likely to gamble but those that do are more likely to experience harm – potential role of gambling accelerating and exacerbating inequalities and thus is a threat to sustainable development goals more generally – this is specifically related to how the global and corporate gambling industry is developing and political actions (or inactions in some cases) in response to this.

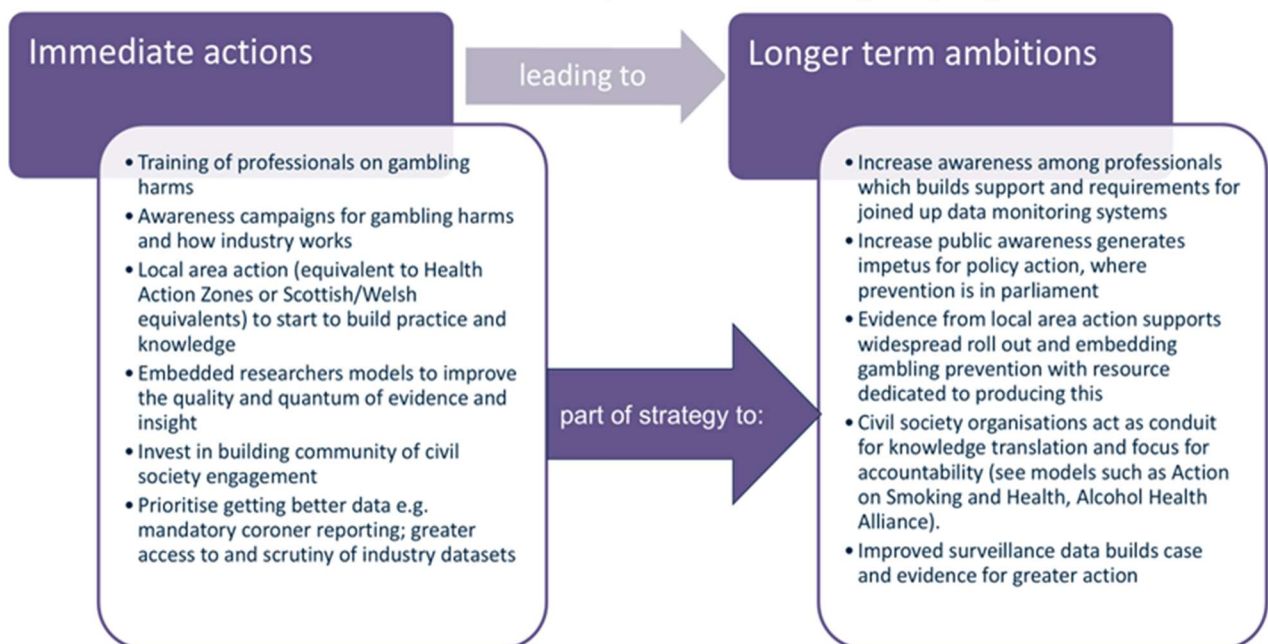


- This has implications for prevention – It needs a whole systems approach to reduce harm; it needs different regulatory approaches; It needs global co-operation.

- A whole systems approach is required because gambling harms impact so many areas including – Crime, work and employment, cultural, financial, relationships, mental and physical health. It therefore needs a multi-sectoral response.
- Gambling harms have a direct impact on areas that local government is responsible for addressing – Poverty, health and wellbeing, gender equality, economic growth, inequalities and community safety. Those who are most vulnerable to gambling harms are also more likely to be in contact with or receiving support from councils.
- There is widespread recognition that the current policy environment is not optimal for a fully realised public health prevention strategy. However, it was also recognised that there is an opportunity to start building towards this ambition, using the statutory levy on gambling operators to implement stronger, robust and independent systems and to start work in some priority actions areas whilst a more comprehensive and commonly-held Prevention Strategy is developed.
- Key features of the system proposed:



- Actions needed now to deliver better systems and strategies going forward –



- Concluding remarks:

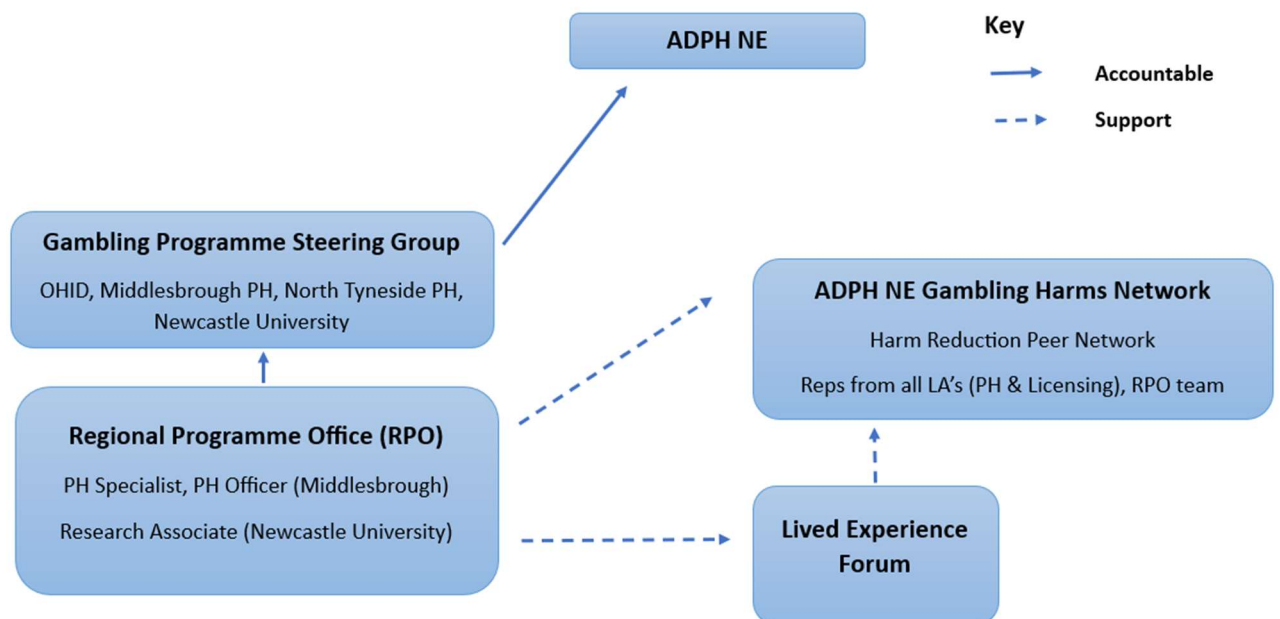
- Instituting effective prevention may require wholesale reframing of the way gambling is considered.
- Needs a systems-based approach, and recognition of taking action across the whole system; a multi-sectoral approach.
- Regional and local-level co-ordinated action is possible and it is possible to make in-roads in the immediate term.

2) North East Gambling Harms Programme – Alice Beadle, Public Health Specialist for Gambling Related Harms working across the North East of England

- Alice Beadle delivered a presentation introducing the work being undertaken in the north east of England addressing gambling harms.

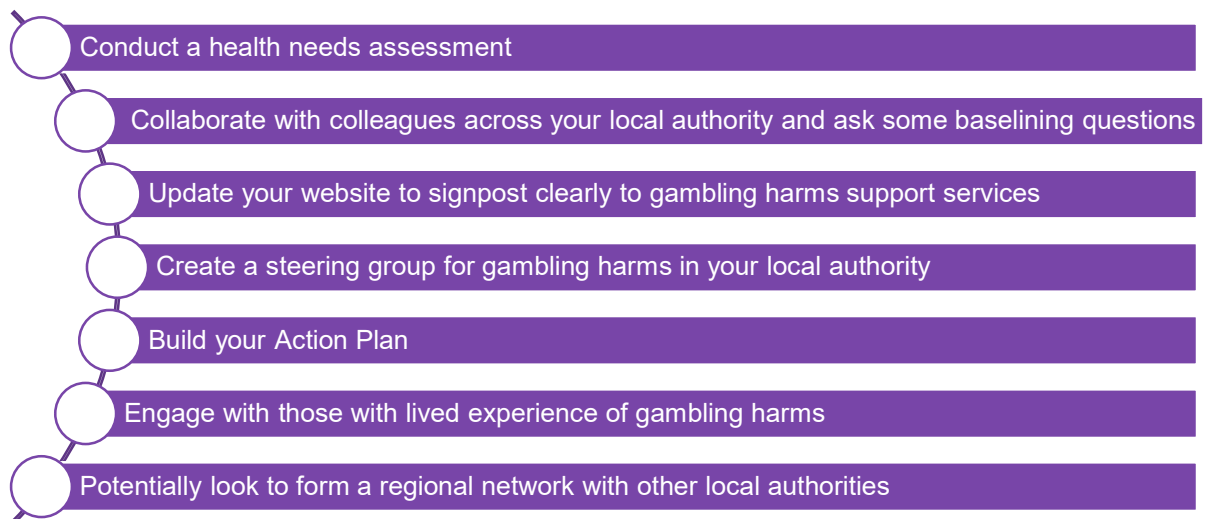
Key points raised in the presentation included:

- In the North East it is estimated that 4.9% of the population (aged 16+) are at-risk gamblers, where they experience some level of negative consequences due to gambling. This is the highest regional estimated prevalence of at-risk gambling in England and was the catalyst for seeking funding to co-ordinate action across the region.
- The Association of Directors of Public Health in the North East (ADPH NE) were awarded £750,000 of funding from the Gambling Commission's Regulatory Settlements Fund. The funding is hosted by Middlesbrough Council and has been used to develop and implement a 3-year regional gambling-related harms programme.
- Over the last year, the 'Regional Office for Gambling Harms' has worked to provide strategic direction, leadership, support to the 12 local authorities and produce resources to support ADPH NE's approach to gambling related harms.
- A whole systems approach has been adopted with key stakeholders engaged including Public Health, academia, University wellbeing services, Planning and Licensing, Financial inclusion, VCSE organisations, treatment and support providers in the NE, MECC NE (Make Every Contact Count)
- Governance Structure:

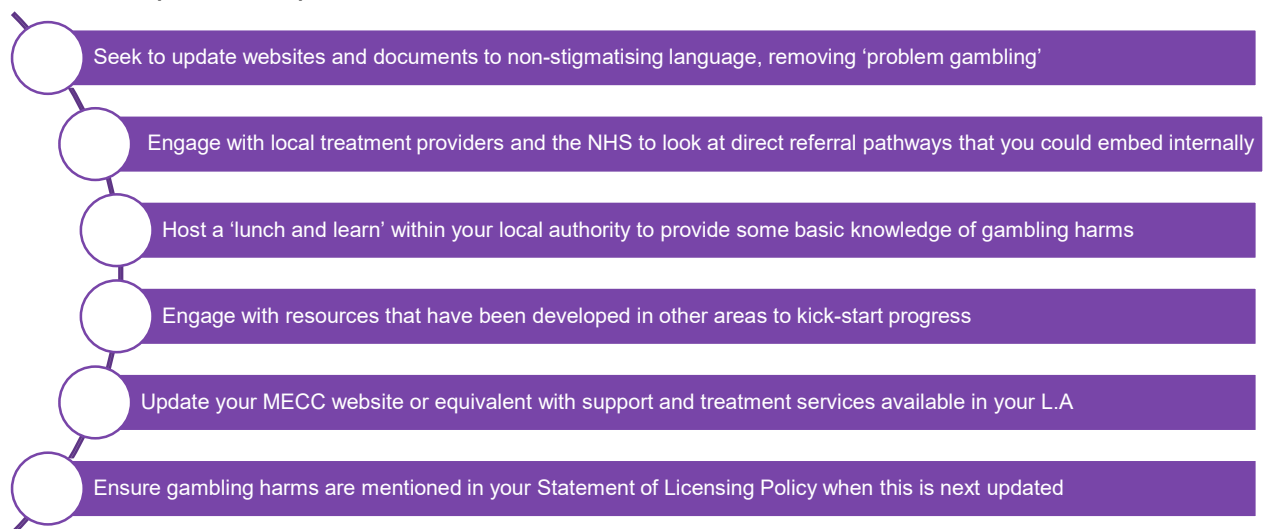


- Working together in a whole systems approach has really helped drive forward progress and will hopefully secure long-lasting impact beyond the Programme.

- The regional approach is built on 8 pillars and is based on the regions approach to alcohol and tobacco. Progress has been made against each of the pillars.
- The pillars are:
 - Support & partnerships
 - Advocacy
 - Media, Communications and Education
 - Treatment
 - Data, Research, Evaluation
 - Licensing
 - Protecting Young People
 - Lived experience
- ADPH NE have produced [a how to guide for local authorities](#), [a gambling harms slide deck](#) to help with training and messaging, and a [slide deck of the academic evidence](#) to provide relevant and up to date literature to aid public health colleagues in evidencing gambling related harms as a public health concern.
- Alice identified initial steps that local authorities can take to reduce gambling harms:



- And some potential quick wins:



- Progress has been made across the region but each council has different capacity and priorities. Awareness has increased amongst front line staff and screening questions are being embedded across council's and VCSE organisations.

- NIHR funding is potentially available (National Institute for Health and Care Research) for specific research projects in partnership with the University of Southampton. Opportunity for collaboration with the University of Southampton.

3) Working Together to Address Gambling Harms – Matt Smith, Director of External Affairs at Betknowmore UK and Expert by Experience

- Matt delivered a presentation outlining the work being delivered by Betknowmore UK with the London Borough of Islington.

Key points raised in the presentation included:

- Betknowmore UK is part of the [National Gambling Support Network](#) and has a mission to ‘provide support and training services that prevent and address personal and societal harms caused by gambling.’
- Betknowmore UK provide 3 key services:
 - Peer Aid (individuals harmed by gambling receive support from trained Peer Supporters, who themselves have fully recovered from gambling harms and addiction)
 - New Beginnings (a peer support service for women directly harmed by gambling and affected others, offering support in one-to-one and group environments)
 - GOALS (Gambling Outreach and Living Support (GOALS) Service works within local communities to enhance resilience to gambling harms.
- Gambling harms have a significant impact on the services provided by local authorities and local priorities – Including Licensing, Community Safety, Public Health, Housing, Children’s Services and Adult Social Services.
- It is estimated that 10,000 residents in Islington may be struggling with gambling harm out of a population of 230,000. Support was available for drug and alcohol addiction but not for gambling harms. Betknowmore UK were approached by the council to work with them and has been providing local solutions to issues in the Borough.

The Solutions

Training and consultancy	Screening and assessment	Support and treatment	Organisational support
Bespoke training and consultancy quality assured by City & Guilds	Screening tool questions co-produced by academics and local authority	Bespoke support services such as drop-ins, community outreach and single sex interventions	Strategic planning days to inform integration into public health and social care
Informed by ‘lived experience’ and sector leading experts	Residents onboarded to support and treatment pathway as quickly as possible	Brief intervention resources and awareness packs for all residents and stakeholders	Quality assured training and workplace resources for all employers and employees

- Betknowmore UK have delivered a WorkSafe session to Islington staff members from across departments to better equip them in having conversations around gambling harms and awareness around the topic.
- Betknowmore have been holding sessions at Access Islington Hubs. These centres offer local people the opportunity to access early intervention and prevention services that support their needs.
- To date they have held 18 Hub sessions and have facilitated 348 brief interventions.
- Betknowmore UK is widening its engagement with council services in addition to attending Hub sessions.
- They are working with faith forums to access minority ethnic groups who are at high risk of gambling harm but are under represented when it comes to accessing support.
- The council does not pay for the support. It is funded through Gamble Aware.
- Matt identified the impact the work with Islington has had so far:

The Impact

Training and consultancy	Screening and assessment	Support and treatment	Organisational support
Awareness of issues and have clear understanding of their impact	Collation of evidence and harm indicators	Improved health and wellbeing of residents	Clear pathways to support for residents and staff
Acquire tools and knowledge to address gambling harms	True fiscal cost of hidden harms emerge	Reduction in associated co-morbid issues	Robust risk management and accountability

- The importance of the support from Councillors, especially Cabinet Members, was recognised particularly in ensuring engagement from across the council.
- Betknowmore UK are keen to expand their work providing wrap around support with local authorities. The introduction of the statutory levy will result in a new system emerging and the existing providers of support are keen to be a key part of the support network in reducing gambling related harms moving forward.

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Agenda Item 7

DECISION-MAKER:	REDUCING GAMBLING-RELATED HARMS IN SOUTHAMPTON - SCRUTINY INQUIRY PANEL
SUBJECT:	PRIMARY PREVENTION
DATE OF DECISION:	16 JANUARY 2025
REPORT OF:	SCRUTINY MANAGER

<u>CONTACT DETAILS</u>			
Executive Director	Title	Executive Director – Enabling Services	
	Name	Mel Creighton	Tel: 023 8083 3528
	E-mail	Mel.creighton@southampton.gov.uk	
Author:	Title	Scrutiny Manager	
	Name	Mark Pirnie	Tel: 023 8083 3886
	E-mail	Mark.pirnie@southampton.gov.uk	

STATEMENT OF CONFIDENTIALITY

None

BRIEF SUMMARY

In accordance with the Inquiry Plan, at the third meeting of the inquiry the Panel will be considering the importance of primary intervention, taking action to prevent the onset of at-risk gambling behaviour, either through whole population measures or those targeting vulnerable groups, to reduce gambling-related harms in Southampton.

The focus will be on:

- Reducing gambling supply and exposure
- Reducing the uptake of gambling

RECOMMENDATIONS:

	(i)	The Panel is recommended to consider the comments made by the invited guests and use the information provided as evidence in the review.
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REASONS FOR REPORT RECOMMENDATIONS

1.	To enable the Panel to compile a file of evidence in order to formulate findings and recommendations at the end of the review process.
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ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

2.	None
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DETAIL (Including consultation carried out)

	<u>Reducing gambling supply and exposure</u>
3.	<i>'When I go to the city centre my intention is to go to a specific retail shop however every other shop in the city centre has some sort of gambling facility maybe it's a pub with a slot machine or a newsagents with scratch cards or an</i>

	<i>arcade or a bookies, the chances of me passing every one of them to get to the shop is near on impossible, the gambling premises are Magnets and I'm the change being dragged in. It's too much temptation and I don't stand a chance. Look at the corner where Nationwide bank is, I walk towards it and there is an arcade on the left, I round the corner and there's a Corals, then next to that there's a Bet Fred then next to that you have an arcade with 2 main doors then next to that you have the same arcade with another 2 main doors. All these gambling establishments are on the main road that leads to poverty stricken St. Mary's and everyone that walks to town goes via this route.'</i> – Feedback to the inquiry from a Southampton resident
	Utilising councils' regulatory tools to help tackle gambling-related harm
4.	Licensing authorities have a statutory role regulating local gambling premises and various tools to try to prevent gambling related harm occurring in premises: developing maps highlighting locally specific gambling risks; preparing local licensing policies setting out expectations of gambling businesses, and undertaking compliance visits to assess whether they are meeting these expectations. Planning policy may also be able to play a role in relation to local gambling premises.
	Role of Licensing
5.	Councils' statutory role in gambling licensing applies to gambling in premises, referred to as non-remote gambling. Remote gambling is the legal term for gambling undertaken other than in a premises, typically over the internet and therefore more commonly known as online gambling. This is regulated by the Gambling Commission.
6.	Licensing authorities are: <ul style="list-style-type: none"> • required to develop an overarching statement of principles (referred to as the statement of policy) setting out how they will approach gambling regulation in their areas. • responsible for issuing gambling premises licences, monitoring compliance with the terms of these licences and the wider Gambling Act, and taking enforcement action if necessary. • required to have regard to the Gambling Act's licensing objectives, one of which is protecting children and other people from being harmed or exploited by gambling.
7.	The statement of policy and local area profile are intended to help prevent gambling related harm occurring. They provide an opportunity to set out the local approach to gambling regulation, expectations of gambling operators and specific local circumstances. A consultation process is required to update statements of policy, which are legally required to be updated every three years.
8.	The local area profile should identify different parts of the local area where there may be greater or specific risks of gambling related harm, whether because of the people likely to be in that area (for example, where there is a treatment centre or hostel); the other types of businesses in the area (for example, in an area with a vibrant night time economy, or where there are already multiple gambling premises), or because of the characteristics of an

	area (for example, if there are pre-existing issues with anti-social behaviour or crime).
9.	Authorities should also use their statements of policy to identify what they expect gambling operators to do to uphold the licensing objectives. Gambling businesses are required to undertake risk assessments for each of their premises. These must take the statement of policy into account, so it is important that authorities use their policies to set clear guidelines for operators.
10.	Southampton City Council adopted a new Statement of Licensing Principles, commencing 31 st January 2025 at a meeting on 27 November 2024 - Gambling Act 2005 - Statement of Principles
	Role of Planning
11.	A number of councils have sought to use the planning system to limit the opening of gambling premises. In 2015 Westminster City Council drew on the work they were doing in developing local area profiling when considering a new premises application. With the support of and evidence from a large number of residents the council was able to refuse an application for a new betting premises licence in an area with multiple existing premises where the local characteristics had led the authority to identify it as a location with a high risk to those who were vulnerable of harm from gambling. Subsequently, a number of other councils have used this, or similar planning approaches, to limit the opening of gambling premises.
12.	Attached as Appendix 1 is a statement from Amber Trueman, Southampton City Council's Strategic Planning Manager that explores options to create targeted planning policies that seek to control the proliferation of gambling premises in Southampton.
	Local Authority restrictions on gambling sponsorship / advertising
13.	Figures published in 2018 identified that the gambling industry spends in excess of £1.5 billion a year on advertising. ¹ In Southampton, whilst the City Council is seeking to manage opportunities from advertising, and permits advertising in its publications, on its Stay Connected emails, on its website and on outdoor mediums such as roundabouts, welcome signs and lamp column banners, the Council, like many other local authorities, has adopted Advertising guidance that precludes gambling and betting services from being able to advertise or be advertised via the Council's platforms.
	Gambling Related Harms in Southampton – Health Needs Assessment
14.	Southampton's Gambling related harms in Southampton Health Needs Assessment includes a review of the evidence relating to the effectiveness of restricting the supply of gambling via the use of regulatory policy (p58-60), and restricting advertising (p60-61). In her presentation to the Panel at the inaugural meeting of the inquiry, Jennifer Clynes, Public Health Specialty Registrar, summarised the evidence relating to supply restrictions as follows: <ul style="list-style-type: none"> • Emerged as an effective strategy for reducing gambling-related harm.

¹ [2018-11-24-gambling-marketing-online-five-times-tv-ad-spend.pdf](#)

	<ul style="list-style-type: none"> • Examples include restricting numbers of gambling venues, restricting licence conditions, and reducing accessibility. <p>Evidence relating to advertising restrictions was summarised as follows:</p> <ul style="list-style-type: none"> • Noted as potentially effective due to dose-response relationship between advertising exposure and gambling participation. Evidence of a notable impact of gambling advertising on certain groups e.g. Children and Young People.
	<u>Reducing the uptake of gambling</u>
15.	<p><i>‘One third of a million of us are problem gamblers... The young are most at risk:</i></p> <ul style="list-style-type: none"> • <i>55,000 problem gamblers are aged 11–16;</i> • <i>for girls aged 11–16, the rate of problem gambling is twice that of any other female age group;</i> • <i>for boys, the rate is three times the rate for adults;</i> • <i>for all of them, gambling is illegal, yet such efforts as the industry makes to prevent it are altogether unsuccessful.’</i> <p>House of Lords Select Committee on the Social and Economic Impact of the Gambling Industry (2020)- Gambling Harm – Time for Action</p>
16.	The extract above from the summary of the 2020 House of Lords Select Committee report reinforces the link between age and the risk of gambling harms. In studies of 18+ the greatest harms from gambling are experienced by those aged 18 to 34 years. ²
17.	Evidence shows that many school students are involved in some form of gambling related activity such as playing cards for money and betting with friends long before they are legally old enough to place bets online or at the local bookmakers, or enter a casino.
18.	<p>The Young People and Gambling 2024: Official statistics published in November 2024 reported that just over one quarter (27 percent) of 11 to 17 year olds had spent their own money on any gambling activity in the 12 months prior to completing the survey. The most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products, namely:</p> <ul style="list-style-type: none"> • playing arcade gaming machines such as penny pusher or claw grab machines (20 percent) • placing a bet for money between friends or family (11 percent) • playing cards with friends or family for money (5 percent).
19.	However, around 1 in 5 (21 percent) young people spent their own money on regulated forms of gambling in the past 12 months, this broad definition includes playing arcade gaming machines which are legally accessible to young people. If we remove arcade gaming machines from the definition then 6 percent of young people spent their own money on regulated forms of gambling. This is an increase from 4 percent in 2023.

² [Gambling related harms in Southampton Health Needs Assessment](#) – p26

	Education
20.	Given the vulnerability of children and young people to gambling harms and the increase in gambling activity, providing young people with the skills and strategies to think critically about gambling and the risks it poses is a sensible approach. Yet, unlike other risky behaviours such as alcohol and drugs, gambling is a topic rarely covered in schools.
21.	The Gambling Harms Needs Assessment (p74) identified that free GamCare sessions were offered to some secondary schools across Southampton. However, no industry-independent programmes were identified from discussions with stakeholders.
	Gambling Harms Awareness Campaigns
22.	Research evidence has highlighted that industry-funded messaging that promotes narratives of personal responsibility (“when the fun stops, stop” and “take time to think”) is insufficient at preventing harm, and can contribute to stigma. ³ To raise awareness of how gambling products and practices can cause harm a number of local authorities have developed their own public health campaigns.
23.	The recent announcement from the Government with regards to the Statutory Levy on gambling operators ⁴ is expected to result in 30% of the estimated £100m to be raised annually being spent on a comprehensive approach to prevention across Great Britain. This could include measures such as a national public health campaign.
	Gambling Related Harms in Southampton – Health Needs Assessment
24.	<p>Southampton’s Gambling related harms in Southampton Health Needs Assessment includes a review of the evidence relating to the effectiveness of reducing the uptake of gambling via education programmes (p55-58), and raising awareness of gambling harms (p61-63). In her presentation to the Panel at the inaugural meeting of the inquiry, Jennifer Clynes, Public Health Specialty Registrar, summarised the evidence relating to education programmes as follows:</p> <p><u>Education in colleges and universities</u></p> <ul style="list-style-type: none"> • Personalised normative feedback (PNF) approach associated with longer-term reduction in harmful gambling behaviour. <p><u>Schools-based education programmes</u></p> <ul style="list-style-type: none"> • Positive intervention effects on <i>cognitive outcomes</i> (e.g. increased knowledge of gambling, fewer misconceptions, and a more negative attitude towards gambling). • Several authors recommend universal, gambling-education for children aged 10 and over, taught via online modules and videos, over multiple sessions, and ideally facilitated by a gambling specialist. <p>Evidence relating to raising awareness was summarised as follows:</p>

³ Allami Y, Hodgins DC, Young M, Brunelle N, Currie S, Dufour M, et al. A meta-analysis of problem gambling risk factors in the general adult population. *Addiction*. 2021 Nov;116(11):2968–77.

⁴ [Government response to the consultation on the structure, distribution and governance of the statutory levy on gambling operators - GOV.UK](#)

	<ul style="list-style-type: none"> Mixed evidence around use of safer gambling, health-promotion messaging, with effectiveness highly dependent on message content.
	Invited guests
25.	<p>To discuss approaches that could be utilised to reducing gambling supply and exposure, a number of guests have been invited to attend the meeting.</p> <p>Education:</p> <ul style="list-style-type: none"> Steve Watts – Chief Executive, GamFam. <p>GamFam is a registered charity set up by those who have experienced first-hand the devastating effects that gambling can have on family and friends.</p> <p>Steve has been asked to discuss the information and awareness work that GamFam have led in Essex, Suffolk and Norfolk to young people (including off to university) and parents. Our Projects - GamFam</p> <p>Awareness Campaigns:</p> <ul style="list-style-type: none"> Ellie Caddick – Senior Communications and Engagement Manager - Public Service Reform, Place and Environment, Greater Manchester Combined Authority. <p>Greater Manchester has been leading the way nationally in the development of a city-region approach to gambling harms. To raise awareness of how gambling products and practices can cause harm, they developed the Odds Are: They win campaign, which was deployed ahead of, during and after the 2022 Football World Cup using a range of digital and out of home channels.</p> <p>Ellie has been invited to talk about the Odds Are: They Win campaign and how people with lived experience helped to design the messaging.</p> <p>Utilising regulatory tools:</p> <ul style="list-style-type: none"> Marlene D’Aguilar - Health in All Policies Strategic Lead, Public Health, Haringey Council <p>In 2022 the London Borough of Haringey had 50 betting shops, 10 adult gaming centres, 2 bingo premises and 2 track betting premises. Gambling is a pressing health inequalities issue. More deprived wards have higher number of betting shops, adult gaming centres and bingo and this is linked to deprivation levels.</p> <p>Marlene has been asked to provide the Panel with an overview of gambling harms in Haringey and how the council are using licensing and planning policies to reduce gambling related harms/risk in the borough.</p>

	<ul style="list-style-type: none"> • Phil Bates / Ian McGuinness – Licensing Manager, Southampton City Council and Senior Licensing Officer, Southampton City Council. <p>Phil and Ian will provide an overview of the gambling premises landscape in Southampton and the city council's approach to the regulation of gambling.</p> <p>A lived experience perspective:</p> <ul style="list-style-type: none"> • Representatives from the lived experience community have been asked to provide a perspective on the landscape of gambling premises in Southampton and licensing policy.
26.	The invited guests will take questions from the Panel relating to the evidence provided. Subject to agreement from the presenters, copies of any presentations will be made available to the Panel and will be published on the Inquiry Panel's pages on the Council website: Browse meetings - Scrutiny Inquiry Panel - Reducing Gambling-Related Harms in Southampton Southampton City Council
RESOURCE IMPLICATIONS	
<u>Capital/Revenue/Property/Other</u>	
27.	Resources to support the scrutiny review will come from existing budgets.
LEGAL IMPLICATIONS	
<u>Statutory power to undertake proposals in the report:</u>	
28.	The duty to undertake overview and scrutiny is set out in Part 1A Section 9 of the Local Government Act 2000.
<u>Other Legal Implications:</u>	
29.	None
RISK MANAGEMENT IMPLICATIONS	
30.	None
POLICY FRAMEWORK IMPLICATIONS	
31.	None
KEY DECISION?	No
WARDS/COMMUNITIES AFFECTED:	None
<u>SUPPORTING DOCUMENTATION</u>	
Appendices	
1.	Role of Planning
Documents In Members' Rooms	
1.	None
Equality Impact Assessment	
Do the implications/subject of the report require an Equality and Safety Impact Assessment (ESIA) to be carried out?	No

Data Protection Impact Assessment	
Do the implications/subject of the report require a Data Protection Impact Assessment (DPIA) to be carried out?	No
Other Background Documents	
Other Background documents available for inspection at:	
Title of Background Paper(s)	Relevant Paragraph of the Access to Information Procedure Rules / Schedule 12A allowing document to be Exempt/Confidential
1.	Gambling Related Harms in Southampton Needs Assessment - Gambling-related harms - https://data.southampton.gov.uk/health/health-behaviours/gambling-related-harms/
2.	Southampton City Council Statement of Principles 2025-2028 - Gambling Act 2005 - Statement of Principles - https://www.southampton.gov.uk/modernGov/documents/s76868/App%201%20-%20Consultation%20SLP%20with%20tracked%20changes.pdf
3.	Southampton City Council - Advertising guidance - https://www.southampton.gov.uk/business-licensing/business-help-advice/advertising-guidance/
4.	Young People and Gambling 2024: Official statistics - https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-2024-official-statistics

Location of gambling premises and the Planning Authority role

The Town and Country Planning (Use Classes) Order 1987 (as amended) dictates what types of land uses fall into different set use classes. Changes to the Use Classes Order in 2015 means that most gambling outlets such as betting shops, amusement arcades and bingo halls are now classified as a “Sui Generis” use. Any new premises falling within this use class must apply for planning permission. The only exception to this would be where a new premises is filling a unit which is already permitted for that use. For example, where a new betting shop tenant moves into a unit where the last known use was also as a betting shop, no planning permission is required as there is no change of use occurring. To clarify, planning permissions run with the land, not the applicant.

As a Sui Generis use, it is possible to create targeted planning policies that seek to control the proliferation of these kinds of gambling outlets, in a similar manner to policies that seek to control other Sui Generis uses such as hot food takeaways. However, such policies can only address the opening of new outlets and cannot retrospectively control existing ones. Any new policy would also only apply to outlets where this kind of gambling function is the primary use. It could not be used for uses such as pubs that may have an electronic gambling machine on site. Such a policy would also need to be adopted as part of the new Local Plan for the city, known as the Southampton City Vision, in order for it to be used in deciding planning applications. The current suite of Local Plan documents does not include such a policy and one cannot be retrospectively added as planning regulations require significant public consultation and an examination in public by an independent Planning Inspector for new policy to be adopted. For that reason, new policies are not adopted on a one-by-one or ad hoc basis but rather holistically with other new policies as part of a new Local Plan.

For new policy controlling the proliferation of gambling outlets to be adopted it would need to be justified through a robust evidence base. This is a requirement for all policies in a Local Plan. A starting point for this would be the Strategic Planning Team’s annual centres survey which records the mix of retail and commercial uses within each of the city’s various centres (a full list of current and proposed centres can be found in Draft City Vision Policy IN3 (City, Town, District and Local Centres) and its supporting text. See pages 81-84 of <https://www.southampton.gov.uk/media/5eidwnjh/full-draft-local-plan-with-options.pdf>).

The survey results could be used to identify the location of gambling outlets to identify any clusters and to understand how numbers of outlets are changing each year. If this analysis indicates a demonstrable problem then this can be used to commence preparation of policy writing and the gathering of any additional evidence that is deemed to be required (such as health data and publications and reports by Government bodies, academia and think tanks) to work up a policy approach. Given the progress that has already been made on the new Local Plan, rather than an entirely new policy on gambling outlets, it may be appropriate to incorporate such policy into an existing draft one. For example, this could be Draft City Vision Policy IN4 (Location of Uses within Centres) which already looks to address the mix and location of different uses in centres (see pages 88-89 of Draft City Vision).

In addition to being justified, the policy would also need to meet other tests of soundness in order to be adopted. This includes the policy being consistent with national planning policy, effective (i.e. actually deliverable) and positively prepared (i.e. ensuring it meets the needs of the city and is worded in a positive manner – not unnecessarily negative/restrictive). The policy, alongside the rest of the new Local Plan, would then need to be subjected to public consultation before being submitted to the Secretary of State who will appoint a Planning Inspector to examine the plan. The Inspector will determine if each policy meets the Government's test of soundness and will require modifications to a policy if it does not. In a worst case scenario, an Inspector can require the removal of a particular policy if they deem it not to meet all soundness tests, which is why ensuring the policy can be justified with sufficient evidence base is crucial.

Notably, there are examples of other local authorities having successfully adopted a policy controlling the proliferation of specific types of gambling outlets as summarised in the table below. Whilst these policies take different approaches there are some commonalities. For example, specifying that there must be a certain number of units with other uses between the types of gambling outlet they are seeking to control.

Newham and Blackpool also require that not more than 3 of the outlets they seek to control should be within 400 metres of each other. Brent takes a different approach and does not allow new outlets where it would breach a specified percentage of the total number of units in a centre. However, such an approach can be more difficult to manage given that these percentage thresholds can be influenced by other factors such as whether new retail units have been added to a centre which would decrease the percentage of gambling outlets even if the actual number of outlets has stayed the same.

Analysis of SCC's 2023 centres surveys indicates that the percentage of gambling outlets in each centre is relatively low. More specifically, at present, the percentage of gambling premises in the district centres is between 1.98 and 3.23%, other than Lordshill which has a result of 12.5% due to the low number of commercial units (16 in total), two of which are gambling uses (1 betting shop and 1 bingo hall). For local centres however, the range is between 0% and 4.76%, except for Aldermoor Road (16.67%), Butts Road (20%) and Windermere Avenue (12.5%) These three each have a betting shop and less than 10 units which skews the percentages notably. (Note: these percentages do include vacant betting shops that could start operating again without new planning permission). As such, a percentage threshold would likely not be the most effective option. However, further detailed analysis would be needed before reaching any firm conclusions or decisions as to which approach should be taken, if a policy is deemed necessary. Likewise, if a policy is deemed an appropriate response, the approach proposed will need to be developed in consultation with Development Management officers who would ultimately be using the policy to determine planning applications. To clarify, any new policy could only be used within the context of new development coming forward through the planning system, not existing units.

Authority	Local Plan Document	Date Adopted	Policy Number	Link to Plan
London Borough of Newham	Newham Local Plan 2018	December 2018	SP9: Cumulative Impact	https://www.newham.gov.uk/downloads/file/1111/newham-local-plan-2018-pdf-
London Borough of Brent	Brent Local Plan 2019-2041	February 2022	Policy BE5: Protecting Retail in Town Centres	https://www.brent.gov.uk/-/media/files/resident-documents/planning-and-bc-documents/brent-local-plan-2019-2041.pdf?rev=b46d40cbd58e465d81447be1565fb679
Blackpool Council	Blackpool Local Plan Part 2: Site Allocations and Development Management Policies	February 2023	DM13: Betting Shops, Adult Gaming Centres and Pawnbrokers in the Town Centre	https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/LPP2-Adoption-Final-Feb-23.pdf

Kind Regards,

Amber Trueman
Strategic Planning Manager
Transport and Planning Service
Growth & Prosperity
Southampton City Council

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