

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>			
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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>

	<p><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</p>
	<p>Utilising councils' regulatory tools to help tackle gambling-related harm</p>
4.	<p>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.</p>
	<p>Role of Licensing</p>
5.	<p>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.</p>
6.	<p>Licensing authorities are:</p> <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.	<p>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.</p>
8.	<p>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</p>

	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.
	<p>Invited guests</p>
<p>25.</p>	<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.
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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
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RESOURCE IMPLICATIONS

Capital/Revenue/Property/Other

27.	Resources to support the scrutiny review will come from existing budgets.
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LEGAL IMPLICATIONS

Statutory power to undertake proposals in the report:

28.	The duty to undertake overview and scrutiny is set out in Part 1A Section 9 of the Local Government Act 2000.
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Other Legal Implications:

29.	None
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RISK MANAGEMENT IMPLICATIONS

30.	None
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POLICY FRAMEWORK IMPLICATIONS

31.	None
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KEY DECISION?	No
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WARDS/COMMUNITIES AFFECTED:	None
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SUPPORTING DOCUMENTATION

Appendices

1.	Role of Planning
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Documents In Members' Rooms

1.	None
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Equality Impact Assessment

Do the implications/subject of the report require an Equality and Safety Impact Assessment (ESIA) to be carried out?	No
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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