



Public Health
England



GAMBLING
COMMISSION

To: Directors of Public Health
English local authorities

January 2018

Dear Director of Public Health

Public Health and gambling

We are writing to ensure you are aware that local licensing authorities are required to review their Statement of Gambling Policy soon, and to encourage you to support them in this process.

The statement is a key tool that licensing authorities can use to seek to protect their residents from the negative impacts associated with problem gambling. These are wide ranging and can impact on individuals and their families and carer's physical, mental and emotional health and wellbeing, as well as having a wider impact on society through crime and disorder, debt, domestic violence and lost productivity.

Licensing authorities should be consulting on their statements in 2018 with a view to revised versions being published by the deadline of January 2019. Whilst, unlike the Licensing Act 2003, Public Health is not a responsible authority under the Gambling Act 2005, this does not prevent Public Health's engagement. We believe that Public Health can play a critical role in this strategic review and assist licensing authorities in developing a Statement which maximises the protections available to citizens as well as the broader wellbeing of the community.

Additionally, it is worthwhile noting that one of the licensing objectives in the Act is the protection of the young and vulnerable from (gambling) harm. The list of responsible authorities on the face of the Act includes an agency who has functions in respect of minimising or preventing 'harm to human health' (which is a very wide definition of their areas of responsibility). Another responsible authority, one concerned with the 'protection of children from harm', is normally the Safeguarding Board.

Public Health teams are likely to have a better understanding of the range of health issues within an LA and how they interrelate and where they are concentrated, which can help licensing authorities:

- Identify and interpret health data and evidence to inform the review of the Statement and develop locally tailored local area profiles.
- Make decisions that benefit and protect the health and wellbeing of local communities.



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- Be clear on issues which they can have regard to when deciding on licenses for a wide range of gambling activities.
- Identify and interpret health data and evidence to inform the review of the Statement;
- Conduct a health-impact assessment of gambling in the local area or assess any existing information.

Importantly it is not being suggested that public health devote resources to the treatment of problem gamblers. Rather they are able, through frontline services, to ensure staff are aware of the issue, recognise the overlaps with individuals they are already coming into contact with and have the systems in place to offer referral to existing accredited providers.

More broadly, the Gambling Commission, LGA, WLGA and PHE are keen to support Public Health teams in this wider engagement on problem gambling, disseminating good practice and discussing how best to develop a dialogue for the future.

We hope that you will be able to support your local licensing authorities in this work.

Yours sincerely

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Executive Director
Gambling Commission

Cllr Izzy Seccombe
Chairman
LGA Community and
Wellbeing Board

Rosanna O'Connor
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Public Health England



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Background information

Problem gambling is less visible than other addictions such as alcohol and drugs but it is:

- associated with a range of other addictions and health related issues¹. It is important that a gambling related problem is diagnosed and treated at the same time as other issues.
- also likely to affect not just the individuals concerns but those around them, whether that's the family who find themselves without enough money for the week's essentials or the partner who suffers abuse

Evidence indicates that particular groups are more vulnerable to gambling related harm than others. Examples include those with mental health issues, homeless people, those with other addictive behaviours, those in areas of multiple deprivation and immigrants.² (This is not a comprehensive list.)

Research in Leeds³ discovered the following:

- At least 13 relevant Leeds services able to provide some advice and guidance on problem gambling including generic services (e.g. Citizens Advice) , targeted support groups, specialist addictions and recovery services
- But there was a lack of join-up on 'gambling related support' which contrasts with strong integration of support/referrals networks across other vulnerable group needs in Leeds.
- Support services see clients affected by gambling related harm –often 'co-morbid' with other challenges (e.g. alcohol or drug addiction) and recovery support
- Universally lack any screening or assessment tools for gambling-related harm. Rare for clients to self-declare.

In Brighton and Hove⁴ Public Health contributed significantly in the development of a Local Area Profile, or heat map, to identify social groups and geographic locations where gambling risk/vulnerability is greatest.

In Tower Hamlets⁵ the Public Health team intervened in the previous consultation on their Statement, recognising the following as a part of their submission:

¹ <http://www.nhs.uk/Livewell/addiction/Pages/gamblingaddiction.aspx>

² <https://www.geofutures.com/research/gambling/>

³ <http://www.leeds.gov.uk/docs/Problem%20Gambling.pdf>

⁴ See case studies page - <http://www.gamblingcommission.gov.uk/PDF/LA-bulletin/Licensing-authority-bulletin-March-2017.pdf>

⁵ http://www.towerhamlets.gov.uk/Documents/Public-Health/JSNA/Gambling_fact_sheet_2016.pdf



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'For health and social care professionals, and even the family and friends of at risk or problem gamblers, the challenge of problem gambling is that it is not easily detectable. It is often described as the 'hidden addiction'. Problem gamblers are far more likely to present with financial, health and relationship issues before an addiction to problem gambling is recognized.'

In Doncaster⁶ the Public Health team intervened over plans to open a new betting shop stating:

Problem gambling not only has a detrimental impact on the health of the individual involved but also on family and friends and is likely to increase the demand for (health) services.

⁶ <http://planning.doncaster.gov.uk/online-applications/applicationDetails.do?previousCaseType=Appeal&previousKeyVal=QQX9GTFX0B200&activeTab=summary&previousCaseNumber=17%2F00014%2FREF&keyVal=OH6YQMF0A200>