

O'Gorman, Linda

RESPONSE 1

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**From:** [REDACTED]  
**Sent:** 10 June 2024 09:48  
**To:** O'Gorman, Linda  
**Subject:** RE: Consultation on Statement of Licensing Policy - Gambling Act 2205

Dear Linda,

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.

Best regards,

O'Gorman, Linda

RESPONSE 2

**From:** [REDACTED]  
**Sent:** 11 June 2024 15:32  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Gambling Policy  
**Attachments:** Ara Gambling Support poster - Age 16+.pdf; Your Call To Action Poster v3.pdf

Hello all

It would have me that advised you on the CAB training. Sorry, I didn't realise their funding had gone.

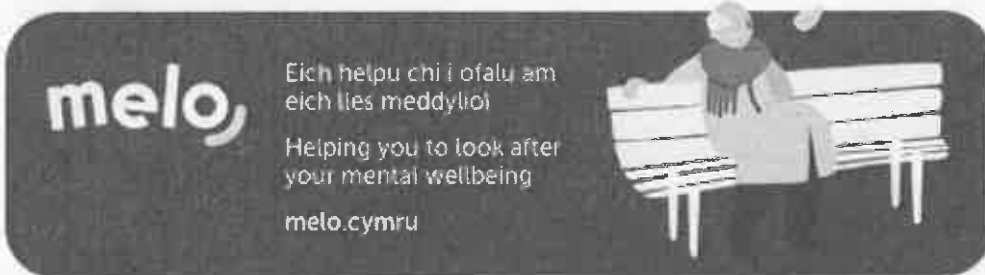
I have recently been made aware of another training provider who delivers a suite of free training, as well as providing support nationally. See attached posters. However, when I click on links I am not getting directed to the training – which is worrying. And the Health Board is blocking my access to the National Gambling website – obviously a gambling website is perceived as being off bounds!

As well as providing training, Ara provide free and confidential gambling help across Wales. They are our national gambling support service provider. There is information on the Melo website about their service: [Managing Gambling Problems | Mental Health & Wellbeing Help \(melo.cymru\)](#)

[Ara: Ara Gambling Service - Gambling Addiction Treatment - Free Counselling \(recovery4all.co.uk\)](#)

Hope this is helpful and you will get the information needed from these links!

[REDACTED]  
[REDACTED]  
Prif Ymarferwr Iechyd Cyhoeddus, Tîm Iechyd Cyhoeddus Aneurin Bevan Gwent  
[REDACTED] Aneurin Bevan Gwent Public Health Team





GIG  
CYMRU  
NHS  
WALES

Bwrdd Iechyd Prifysgol  
Aneurin Bevan  
University Health Board

22<sup>nd</sup> August 2024

Licensing Section, Monmouthshire County Council  
Abergavenny Community Education Centre  
Old Hereford Road  
Abergavenny, NP7 6EL

Dear Colleague,

**Re: Response to the Draft Statement of Gambling Licensing Policy 2025**

I am writing to provide a formal response on behalf of the Aneurin Bevan University Health Board (ABUHB) regarding Monmouthshire County Council's Draft Statement of Gambling Licensing Policy 2025.

ABUHB welcome the opportunity to comment on this important document and commend the Licensing Authority for its comprehensive approach in considering the implications of gambling within its local community. ABUHB request you consider our comments on the draft Statement below as part of your consultation process:

1. **Protecting Children and Vulnerable Groups:** ABUHB support the Gambling Act's 2005 Statement that the licensing objective of 'protecting children and other vulnerable persons from being harmed or exploited by gambling' must be regarded.

In their joint report on the 'True Cost of Gambling'<sup>1</sup>, Public Health Wales and Bangor University highlighted that as well as affecting children and young people, gambling-related harm disproportionately affects certain socio-economic groups, which exacerbates existing inequalities. The report stated that population groups at greater risk of experiencing problem gambling and/or gambling related harms include:

- Children, either because of their own gambling or because of parental or carer gambling.
- Individuals living in most deprived areas, with problem gambling being over seven times higher compared to individuals living in least deprived areas.

<sup>1</sup> True cost of gambling underestimated, say new publications | News and Events | Bangor University

**Bwrdd Iechyd Prifysgol Aneurin Bevan**  
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- Those with constrained economic circumstances due to unemployment, underemployment, financial difficulties and debt.

Evidence also suggests a clear relationship between the proximity of gambling premises and increased participation in gambling, and subsequent increased likelihood of experiencing gambling-related harms<sup>2</sup>. Therefore, ABUHB *recommend* that the Policy includes reference to this evidence and incorporates specific preventative measures to protect children and vulnerable groups from the potential negative impact of a premise location and the density of licensed premises. This could include, for example, any new license application not being considered if located in an area of higher deprivation, near a Job Centre Plus site, or near premises frequented by children and young people, such as schools.

ABUHB support the inclusion of proof of age schemes cited in the Policy to minimise the risk of underage gambling in physical premises.

2. **Collaboration and Data Sharing:** ABUHB applaud the Licensing Authority for continuing to work closely with Gwent Police, and other relevant stakeholders to monitor and address gambling-related harms. ABUHB appreciate the importance of data sharing between key agencies to help identify trends and hotspots for gambling-related issues, enabling a more proactive and informed approach to licensing and enforcement.
3. **Promotion of Responsible Gambling:** ABUHB *recommend* that the Policy further emphasizes the role of licensed premises to promote responsible gambling through stipulating that all licensed premises visibly display the risks of gambling and signpost to the national gambling support service: [Ara Recovery for All](#), within their premise.

ABUHB *recommend* the consideration of mandatory training for staff at gambling establishments which includes awareness of gambling related harms and availability of support services for those who need them.

4. **Monitoring and Evaluation:** Finally, ABUHB *recommend* that the policy includes provisions for ongoing monitoring and evaluation of its impact, including the impact on public health. This should involve regular reviews of the policy's effectiveness in reducing gambling-related harms, with adjustments made as necessary based on emerging evidence and best practices. ABUHB's Public Health team would be happy to support this process.

In conclusion, ABUHB believe that the Draft Statement of Gambling Licensing Policy 2025 provides a solid framework for regulating gambling activities in Monmouthshire. However, we urge the Licensing Authority to consider the additional public health recommendations outlined above to further safeguard the wellbeing of the community of Monmouthshire.

Once again, we congratulate the Licensing Authority in its work to promote a healthier and safer environment for all its residents. Please do not hesitate to contact us if you require any further clarification on our response.

Yours sincerely,

  
  
Public Health & Strategic Partnerships

<sup>2</sup> PHE document ([publishing.service.gov.uk](https://publishing.service.gov.uk))

## **GamCare's response to Monmouthshire County 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 Monmouthshire County 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.
- The recommendations below will help to realise Monmouthshire County Council's wider Plan, in particular "improving health and wellbeing," due to gambling's relationship to poor mental health and suicidality. They will also help the council to comply with its obligation to "protect vulnerable people".
- It is vital that Monmouthshire County 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 would like to see Monmouthshire County 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, Monmouthshire County Council should pursue an approach similar to that pioneered by Westminster Council. They developed a Local Area Profile that specifically analysed gambling risk, and used this data as a basis from which to scrutinise and possibly oppose a licensing application.
- The changes to Monmouthshire County 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.