

The Aneurin Bevan Gwent Public Health team support this very comprehensive Statement, but would recommend the strengthening of a certain sections within the Statement, as detailed below:

Location of premises and conducting risk assessments (Section 2.4 'Location', pages 13-14 and Section 6 'Risk Assessment – premises', pages 34-36):

The Welsh Government Chief Medical Officer (CMO) for Wales's Annual Report 2016/17: 'Gambling with our Health' cited the following key messages:

- The proximity to gambling facilities correlates with increased participation in gambling
- The density of gambling outlets is linked with greater gambling-related harm
- The greatest problems and harms from gambling are experienced by the poorest of our society, with those members of the public living in low income households spending a higher proportion of their income on gambling, betting more than they can afford and experiencing financial problems as a result of gambling
- The location of gambling venues is not random, with a greater clustering of gambling facilities in areas of social deprivation.

The Aneurin Bevan Gwent Public Health Team support the inclusion of the Monmouthshire County Council's intention, detailed within the Statement, that "*should any specific policy be decided upon as regards areas where gambling premises should not be located the Statement will be updated*".

The Aneurin Bevan Gwent Public Health Team welcome the development of such a policy. We would recommend that until this policy is developed, and the Statement updated, the primary consideration of any new gambling premise application should be the geographical location of the premise.

Recommendation 1: We recommend that 'location of the premise' is clearly specified in the Statement as the primary consideration of any new gambling licence, until the location policy is developed, and Statement updated. In particular:

- (i) is the premise located in an area of deprivation?
- (ii) AND is the premise located within an existing clustering of gambling premises?

Licensing Objective – protection of Children and other vulnerable persons from being harmed or exploited by gambling (see Section 2.6)

The Aneurin Bevan Gwent Public Health team recognise that consumer protection from gambling related harm to the individual, their family, friends and community is the responsibility of licensing authorities, supported by local partners and gambling operators.

Evidence indicates that there are a number of identifiable groups within the population who are more vulnerable to gambling related harm, including young people. Details of these groups are outlined in the CMO's Annual Report 2016/17 and in the report prepared for the Gambling Commission by the NatCent Social Research in 2017: 'Gambling behaviour in Great Britain in 2015 Evidence from England, Scotland and Wales'.

Therefore, in addition to prioritising the geographical location of gambling premises, based on social deprivation and density of gambling premises (as detailed in the recommendation above), we request that reference is made to environmental conditions which increase the likelihood of gambling related harm. The Aneurin Bevan Gwent Public Health team acknowledge that some of these venues are already listed in the Statement, but recommend that local partners work together to identify a list of

environmental conditions/specific local premises, after considering the findings from national reports of groups vulnerable to gambling related harm, in addition to local intelligence. This information could be included within the location policy (which we support the development of) and/or as an appendix.

Recommendation 2: Until a full list of local environmental conditions is identified and the Statement updated, the Aneurin Bevan Gwent Public Health team recommend that the following wording is included in the current Statement as a priority:

“The consideration of the proximity of gambling premises to locations where groups vulnerable to problematic gambling may congregate, e.g. schools, alcohol services, supported housing, will be a priority for the applicant and licensing authority”.

The Statement could also include the wording: ‘A list of these vulnerable groups can be found in Appendix X’ if time allowed prior to publishing the Statement. The Aneurin Bevan Gwent Public Health team will be able to provide partners with a list of groups vulnerable to gambling related harm based on published national research, and advise on the process of identifying the locations they may congregate.

The co-occurrence of alcohol and gambling is well documented and referenced in key national documents (including the CMOs Annual Report and several Gambling Commission briefing papers).

Recommendation 3: The Aneurin Bevan Gwent Public Health team recommend that the consideration of the location of alcohol licensed premises plays a greater role when considering gambling applications, and that the ‘location of premises licensed to sell/supply alcohol’ be specified in the Statement as a key consideration for gambling licence applications.

Procedures for identifying customers who are at risk of gambling (section 2.1, page 11 and section 2.6 p17)

The Aneurin Bevan Gwent Public Health team welcomes the inclusion of staff training within the Statement, but would like to see this section strengthened.

Recommendation 4: The Aneurin Bevan Gwent Public Health team recommends that information in the Statement includes additional training content which is standardised and regularly reviewed/updated. The content should be extended to include learner knowledge of:

- the risks of gambling related harm
- how to identify problematic gamblers
- where to signpost people for support

These learning outcomes will be in addition to the already documented training content: *“procedures for identifying customers who are at risk”* (page 17). Training is available locally from Newport Citizens Advice Bureau (CAB) as well as from GambleAware.

Recommendation 5: The Aneurin Bevan Gwent Public Health team recommend that the Statement includes a proviso that all gambling premises clearly promote **local** and national support services – in particular Newport CAB Gambling Support Services and GambleAware.

Prepared by: Jackie Williams, Senior Health Promotion Specialist, on behalf of Dr Arif Mahmood, Consultant in Public Health – Aneurin Bevan Gwent Public Health Team 31st August 2018