

9 August 2024

To: Ian Williams
Chief Executive
Darlington Borough Council

Subject: Gambling Policy Review

Dear Ian,

I am writing in response to Darlington Borough Council's formal consultation on the Gambling Act 2005 Statement of Principles.

In my national role with the APCC I am the co-lead on substance misuse and addictions, which includes harmful gambling. I am, therefore, fully supportive of any measures that can be taken to prevent harmful gambling and I would like to increase engagement with Darlington Borough Council in respect of taking a public health approach to gambling, to reduce the impact that it has on crime and disorder.

In response to the Gambling Policy Review, I make the following recommendations for the Council to consider in its revised policy.

1. We know that problem gambling has a link to crime and on intergenerational harm ([Crime and Problem Gambling: a Research Landscape](#)). The Council should consider **expanding and mandating** the measures currently proposed in licensing conditions to protect and safeguard vulnerable people from further harm.

In terms of support for vulnerable people, I would suggest including:

*"When considering whether to grant a Premises Licence or Permit, the Council will consider measures necessary to protect **vulnerable people**, including:*

- *leaflets offering assistance to problem gamblers should be available on gambling premises in a location that is both prominent and discreet*
- *training for staff members which focuses on an employee's ability to detect a person who may be vulnerable and providing support to vulnerable persons*
- *self-exclusion schemes (and deterrence of multiple accounts)*
- *operators should demonstrate their understanding of best practice issued by organisations that represent the interests of vulnerable people*
- *posters and leaflets with the NHS Northern Gambling Service and GamCare Helpline and website displayed in prominent locations*
- *external advertising e.g. on windows and entrances to be positioned or designed not to entice passers-by".*

All incorporated into point 6.44

In addition, the council should consider separating the definition of vulnerable people from the measures suggested to protect them and strengthening that definition. I would suggest:

“The Gambling Commission, in its guidance to local authorities, does not seek to offer a definition, but will, for regulatory purposes assume that this group includes people: ‘Who gamble more than they want to, people who gamble beyond their means, elderly persons, and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, or because of the influence of alcohol or drugs.’”

Already defined in Section 10 with the addition of elderly persons

2. In the decision-making processes the Local Authority should consider using the gambling harm prevalence tool provided by Gamble Aware to protect those key socio-demographic groups and locations that have been identified as being at risk.

Reference to tool kits added to point 2.2

3. When issuing a licence either for a new premises or a fair or such like in a high risk community, stipulate some form of ‘local’ awareness training for the staff as a means to mitigating the risk to communities as highlighted in the statement of principles.

Reference to training in point 6.44

4. For areas such as online gambling, personal premises whereby the Gambling Commission is the enforcement body and not the Local Authority, the Local Authority (and other partners e.g. police) should consider a commitment to work more closely with the Gambling Commission to prevent gambling from becoming a source of crime, reduce harm and improve any investigations.

Included in point 2.2

5. The policy states that *“local data is not currently available on the prevalence of gambling in Darlington...”*. The Council should invest in research to understand the problem of gambling related harm to help understand the extent of harmful gambling, impacts and costs associated with it. This could be done through the development of a local needs assessment.

Highlighted to public health lead for development

6. A report by PHE titled ‘Tackling Gambling Related Harm’ was published in partnership with the Local Government Association in 2018. It sets out a whole council approach to reducing gambling related harm and I would encourage Darlington Borough Council to adopt this approach as part of its new policy or as a separate piece of strategy work, together with partner organisations. The areas where I consider that this approach can add value include the following:

- Providing guidance to public health issues when developing the Gambling Policy: Public health has a positive contribution to make as a non- statutory consultee to influence the content of draft gambling policies in the context of protecting the health of the most vulnerable people in our communities with reference to gambling -related harm. For example, [the OHID and Public Health England Gambling-related harms evidence review](#) considered these categories of harms: financial, relationship disruption, conflict or breakdown, mental and physical health, cultural, employment and education, criminal activity. A high-quality quantitative study showed that people with gambling disorder have an increased risk of dying from any cause, in a given time period, relative to the general population. Two quantitative studies (of moderate and high quality) reported that deaths from suicide were significantly higher among adults with gambling disorder or problems compared to the general adult population.
- Signposting to relevant health data and evidence, for example in the production of local gambling harm profiles - This includes maximising available data to support the evidence base as a means to improve the health and well-being of the whole population. They are one-stop shops covering a whole range of data and analysis tools for public health which can assist with developing focused preventative work.
- Ensuring that consideration and attention is given to the health and well-being of the population - Sharing a strategic perspective about the importance of health and well-being and identify areas of consideration relevant to harmful gambling which may otherwise be overlooked or omitted due to a lack of capacity around the topic.
- Provide a one-stop shop public health reference point - Utilise the development of the Gambling Policy as a means to develop relationships on all matters relating to public health. This can include other aspects of work, such as providing evidence should a licence require a review or when a condition is considered necessary, as well as responding to guidance or consultation papers around gambling.

Highlighted to public health for development

I would also urge that the Local Authority considers other Gambling policies which are seen as promising practice. I provide a link to one of these: [Gambling Act Statement of Principles 2022-25 \(liverpool.gov.uk\)](#).

Reviewed and in line with current Gambling Commission Guidance

I understand that some of these recommendations lie outside the remit of the licensing policy, however I am keen to progress this work and develop a local partnership strategy to reduce gambling related harm.

Yours sincerely,



Joy Allen
Durham Police and Crime Commissioner