



GAMBLING ACT 2005

STATEMENT OF PRINCIPLES

28th January 2025-

27th January 2028

Comments are invited on this document to:

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STATEMENT OF PRINCIPLES

Gambling Act 2005

Update November 2024

1. Preface

1.1 Under the Gambling Act 2005, a new regime for regulating gambling and betting was introduced throughout the United Kingdom from 1 September 2007. Apart from spread betting, gambling and betting (including the National Lottery) are regulated by the Gambling Commission, whose duties include licensing the operators and individuals involved in providing gambling and betting facilities.

1.2 Watford Borough Council, along with other local licensing authorities, has a duty under the Act to license premises where gambling takes place, and to license certain other activities (such as registering small society lotteries). This document sets out how we intend to approach this task.

1.3 The Gambling Act requires that the following parties are consulted by licensing authorities:

- the chief officer of Police for the authority's area
- one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area
- one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Act.

1.4 Following consultation during July and August 2021, the current statement of principles on gambling was agreed and published by the Council in January 2022. In response to the most recent *Guidance to licensing authorities*, first issued by the Department of Digital Culture Media and Sport (DCMS) on 1 April 2021. Officers have added to the statement of principles and a draft of a revised policy covering the three-year period 2025 to 2028 (set out below) has been produced for public consultation.

1.5 We have consulted:

- local residents and their representatives
- holders of various licences for premises in the Borough who will be affected by it
- Hertfordshire Constabulary
- Hertfordshire Fire & Rescue Service
- Hertfordshire Safeguarding Children Partnership
- Hertfordshire Director of Public Health
- Watford Business Improvement District
- the Gambling Commission
- the local planning authority
- Environmental Health
- HM Revenue and Customs

1.5.1 We will place details on our website and on social media and issue a press release to the Watford Observer following the final version to be ratified at the Licencing Committee meeting on the 9th of January 2025.

1.5.2 It is Proposed under this draft statement of principles, covering the three-year period 2025 to 2028, the following:-

To adopt the “Hertfordshire Gambling-related Harms Strategy (2024-2029)” that is currently being completed by the Gambling Harms Alliance, it is presently in a consultation process. Watford Borough Council is a member of the Gambling Harms Alliance.

PART A

2. Introduction

2.1 It is intended that this draft revised Statement of Principles, as amended (Appendix 1), will be approved by the Council’s Licensing Committee and be effective from 9th January 2025 to 9th January 2028.

2.2 It should be noted that this policy statement will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each case will be considered on its own merits and according to the statutory requirements of the Gambling Act 2005.

2.3 Incorporation of Hertfordshire Gambling Harms Strategy and JSNA Briefing

2.3.1 This Statement of Principles incorporates the findings and recommendations of the Hertfordshire Gambling Harms Strategy (Appendix 2) and the 2022 Joint Strategic Needs Assessment (JSNA) Briefing on Gambling-related harms (Appendix 3). These documents provide valuable insights into the local Hertfordshire context of gambling harms and inform the Watford Borough Councils’ (as the licensing authority) approach to promoting the licensing objectives.

2.4 Explicit Recognition of Gambling Harms

2.4.1 The licensing authority recognises that gambling can cause significant harm to individuals, families, and communities. The potential harms associated with problem gambling include:

- Financial problems, such as debt, bankruptcy, and homelessness.
- Relationship breakdowns, including family conflicts and separation.
- Mental health issues, such as depression, anxiety, and suicidal ideation.
- Physical health problems, including sleep disturbances and stress-related illnesses.
- Criminal activity, such as theft and fraud.

2.4.2 The licensing authority will take a proactive approach to preventing and mitigating these harms by promoting responsible gambling practices, supporting public awareness and education initiatives, and collaborating with relevant stakeholders.

2.5 Consideration of Cumulative Impact

2.5.1 The licensing authority will assess the cumulative impact of gambling premises in Watford and specific areas, considering the concentration of gambling opportunities and their potential impact on children and vulnerable individuals. This assessment will be informed by data from various sources, including the Police, the Hertfordshire Gambling Harms Alliance, and other relevant stakeholders and will take place during the period of this current statement of principles to inform the next review of this policy document.

2.6 Addressing Specific Vulnerable Groups

2.6.1 The licensing authority will work in close partnership with the Hertfordshire Gambling Harms Alliance and other relevant organisations to address the needs of specific vulnerable groups, including:

- Children and young people.
- Individuals with mental health conditions.
- Those facing economic hardship.
- Specific gender and age groups.
- Individuals experiencing homelessness or who are veterans.

Working closely with the Gambling Harms Alliance and organisations such as Breakeven will assist in training and empowering Watford Licensing to support measures to protect such vulnerable groups.

2.6.2 The licensing authority will aim to provide training for staff on how to identify and support vulnerable individuals, and will consider appropriate licensing conditions to protect these groups from harm.

2.7 Increased Risk of Suicide

2.7.1 The licensing authority acknowledges the heightened risk of suicide associated with problem gambling. Prevention and support measures will be emphasized, including signposting to relevant support services and promoting responsible gambling practices. Though this statement is limited we aim to take on board the more detailed information as attached in our appendices.

2.8 Data Collection and Evaluation

2.8.1 The licensing authority will collect and analyse data on gambling harms in the borough drawing data from partner groups to inform its licensing decisions and evaluate the effectiveness of its prevention and mitigation measures. It is hoped that this data will be used to identify trends, assess the impact of gambling premises on local communities, and inform the development of targeted interventions.

2.9 Collaboration

2.9.1 The licensing authority will collaborate with a range of stakeholders, including the Hertfordshire Gambling Harms Alliance, the Gambling Commission, the Police, public health professionals, and community groups to address gambling harms comprehensively. This collaboration will ensure a coordinated and effective approach to preventing and mitigating gambling-related harms in the borough.

2.10 Public Awareness and Education

2.10.1 The licensing authority will support public awareness and education initiatives to promote responsible gambling and increase understanding of the potential harms associated with problem gambling. These initiatives will target a range of audiences, including children, young people, parents, and the wider community.

3. Training for Professionals

3.1 The licensing authority will promote training for professionals who may come into contact with individuals affected by problem gambling, such as licensing officers, the Police, and public health workers with assistance from partnership organisations such as the Breakeven organisation. This training will equip professionals to identify and support individuals at risk of or experiencing gambling harms, and to signpost them to appropriate support services.

4. Conclusion

The measures outlined in this revised Statement of Principles demonstrate Watford Borough Council's commitment to addressing gambling harms as comprehensively as possible. By incorporating the latest research and best practices, collaborating with relevant stakeholders, and taking a proactive approach to prevention and mitigation, the licensing authority will strive to protect children, vulnerable people, and the wider community from the potential harms associated with gambling.

5. Authorised activities

5.1 'Gambling' is defined in the Act as either gaming, betting or taking part in a lottery:

- 'gaming' means playing a game of chance for a prize
- 'betting' means making or accepting a bet on the outcome of a race, competition, or any other event; the likelihood of anything occurring or not occurring; or whether anything is true or not true
- a 'lottery' is where persons are required to pay in order to take part in an arrangement, during the course of which one or more prizes are allocated by a process which relies wholly on chance.

5.2 Private gaming in private dwellings and on domestic occasions is exempt from licensing or registration providing that no charge is made for participating. Domestic betting between inhabitants of the same premises or between employees of the same employer is also exempt; Private gaming can potentially take place on commercial premises in very specific circumstances, and where the public have access, but organisers are advised to seek advice before organising events of this nature.

5.3 Non-commercial gaming and betting (where no parts of the proceeds are for private gain) may be subject to certain exemptions. Further advice should be sought from the council's licensing team where appropriate.

6. Licensing Objectives

6.1 In exercising most of their functions under the Gambling Act 2005, licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- ensuring that gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling. The Gambling Commission states: “The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling”.

7. Statement of Principles

7.1 This Statement of Principles is intended to meet the council’s obligations under section 349 of the Act. In carrying out its’ functions in relation to premises licences and temporary use notices, the council will generally aim to permit the use of premises for gambling as long as it is considered to be:

- in accordance with any relevant Codes of Practice issued by the Gambling Commission
- in accordance with any Guidance issued by the Gambling Commission. All references to the guidance refer to the Gambling Commission’s Guidance to Licensing Authorities (published April 2012¹ and updated May 2021)
- reasonably consistent with the licensing objectives
- in accordance with this Statement of Principles.

8. Types of Licences and Permissions

8.1 Under the Act, the Gambling Commission is responsible for issuing operating licences and personal licences. The council in its’ capacity as a licensing authority will:

- be responsible for the licensing of premises where gambling activities are to take place by issuing premises licences
- issue provisional statements
- regulate members’ clubs and miners’ welfare institutes who wish to undertake certain gaming activities via issuing club gaming permits and/or club machine permits
- Issue club machine permits to commercial clubs
- grant permits for the use of certain lower stake gaming machines at unlicensed family entertainment centres
- receive notifications from alcohol licensed premises (under the Licensing Act 2003) of the use of two or less gaming machines
- grant licensed premises gaming machine permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where more than two machines are required
- register small society lotteries below prescribed thresholds
- issue prize gaming permits
- receive and endorse temporary use notices
- receive occasional use notices
- provide information to the Gambling Commission regarding details of licences issued
- maintain registers of the permits and licences that are issued under these functions

- exercise its powers of compliance and enforcement under the Act in partnership with the Gambling Commission and other relevant responsible authorities.

9. The Gambling Commission

9.1 The Gambling Commission regulates gambling in the public interest. It does so by keeping crime out of gambling; by ensuring that gambling is conducted in a fair and open way; and by protecting children and vulnerable people. The Commission provides support and advice to the government about the manner in which gambling is carried out, the effects of gambling, and the regulation of gambling generally.

9.2 The Commission has issued guidance under section 25 of the Act about the manner in which licensing authorities exercise their licensing functions under the Act and, in particular, the principles to be applied.

9.3 The Commission will also issue Codes of Practice under section 24 about the way in which facilities for gambling are provided, which may also include provisions about the advertising of gambling facilities.

9.4 The Council works in partnership with the Gambling Commission to regulate gambling. The Commission focuses on operators and issues of national or regional significance, and the Council take the lead on regulating gambling locally.

9.5 The Gambling Commission can be contacted at:

Gambling Commission
Fourth Floor
Victoria Square House
Victoria Square
Birmingham
B2 4BP

Website: www.gamblingcommission.gov.uk

10. General Statement of Principles

10.1 The council recognises the wide variety of premises which will require a licence or a permit. These include casinos, betting shops, bingo halls, pubs, clubs and amusement arcades.

10.2 In carrying out its licensing functions the council will have regard to any guidance issued by the Gambling Commission from time to time.

10.3 The council will not seek to use the Act to resolve matters more readily dealt with under other legislation.

10.4 To ensure the licensing objectives are met the council will establish a close working relationship with the Police, the Gambling Commission and, where appropriate, other responsible authorities.

10.5 Where children, young persons and other vulnerable people are allowed access to premises where gambling takes place, the council may take whatever steps are considered necessary to either limit access generally or by introducing measures to prevent under-age gambling where it believes it is right to do so for the prevention of their physical, moral or psychological harm from gambling, especially where it receives representations to that effect.

10.6 Applicants seeking premises licences are encouraged to propose any prohibitions or restrictions of their own in circumstances where it is felt that the presence of children would be undesirable or inappropriate.

10.7 However, the overriding principle is that all applications and the circumstances prevailing at each premises will be considered on their own individual merits. When applying these principles the licensing authority will consider, in the light of relevant representations, whether exceptions should be made in any particular case. As with the Gambling Commission, the licensing authority will regulate gambling in the public interest.

11. Preventing gambling from being a source of crime and disorder

11.1 The Gambling Commission will play a leading role in preventing gambling from being a source of crime and will maintain rigorous licensing procedures that aim to prevent criminals from providing facilities for gambling.

11.2 Anyone applying to the council for a premises licence will have to hold an operating licence from the Commission before a licence can be issued, with the only exception being applications for track premises licences. Therefore, the council will not generally be concerned with the suitability of an applicant and where concerns about a person's suitability arise the council will bring those concerns to the attention of the Commission.

11.3 If an application for a licence or permit is received in relation to premises which are in an area noted for particular problems with organised crime, the council will, in consultation with the Police and other relevant authorities, consider whether specific controls need to be applied to prevent those premises from being a source of crime.

11.4 There are already powers in existing anti-social behaviour and licensing legislation to deal with measures designed to prevent nuisance, whether it arises as a result of noise from a building or from general disturbance once people have left a

building. The council does not intend to (and indeed, cannot) use the Act to deal with general nuisance issues, for example, parking problems, which can easily be dealt with using other powers.

11.5 Issues of disorder should only be dealt with under the Act if the disorder amounts to activity which is more serious and disruptive than mere nuisance *and it can be shown that gambling is the source of that disorder*. A disturbance might be serious enough to constitute disorder if Police assistance was required to deal with it. Another factor which could be taken into account is how threatening the behaviour was to those who could see or hear it, and whether those people live sufficiently close to be affected or have business interests that might be affected.

11.6 When making decisions in this regard the council will give due weight to any comments made by the Police.

12. Ensuring gambling is conducted in a fair and open way

12.1 The Gambling Commission does not generally expect local authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will either be a matter for the management of the gambling business or will relate to the suitability and actions of an individual. Both issues will be addressed by the Commission through the operating and personal licensing regime.

12.2 Because betting track operators do not need an operating licence from the Commission the council may, in certain circumstances, require conditions on a licence relating to the suitability of the environment in which betting takes place.

13. Protecting children and other vulnerable people from gambling

13.1 Apart from one or two limited exceptions, the intention of the Act is that children and young persons should not be allowed to gamble and should therefore be prevented from entering gambling premises which are 'adult-only' environments.

13.2 In practice, steps will generally be taken to prevent children from taking part in, or being in close proximity to, gambling especially with regard to premises situated in areas where there may be a high rate of reported truancy. There may also be restrictions on advertising so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children.

13.3 When considering whether to grant a premises licence or permit the council will consider whether any measures are necessary to protect children, such as the supervision of entrances, the segregation of gambling from areas frequented by children and the supervision of gaming machines in non-adult gambling specific premises, such as pubs, clubs, betting tracks etc.

13.4 In seeking to protect vulnerable people the council will include people who gamble more than they want to, people who gamble beyond their means, and people who may not be able to make informed or balanced decisions about gambling, perhaps due to a mental impairment, alcohol or drugs.

13.5 Children (defined in the Act as under 16s) and young persons (16-17s) may take part in private and non-commercial betting and gaming, but the Act contains a number of restrictions on the circumstances in which they may participate in gambling or be on premises where gambling is taking place. An adult is defined as 18 and over. In summary:

- betting shops cannot admit anyone under 18
- bingo clubs may admit those under 18 but must have policies to ensure they do not gamble, except on category D machines
- Adult Entertainment Centres cannot admit those under 18
- Family Entertainment Centres and premises with an alcohol premises licence such as pubs) can admit under-18s, but they may not play category C machines which are restricted to those over 18
- clubs with a Club Premises Certificate can admit under-18s, but they must have policies to ensure those under 18 do not play machines other than category D machines
- tracks will be required to have policies to ensure that under 18s do not participate in gambling, except on category D machines.

13.6 The council will always treat each case on its own individual merits and when considering whether specific measures are required to protect children and other vulnerable people will balance its considerations against the overall principle of aiming to permit the use of premises for gambling.

13.7 In January 2018 Public Health England, the Local Government Association and the Gambling Commission wrote to Directors of Public Health in England outlining the links between Public Health and gambling; specifically, that problem gambling can have an impact on physical, mental and emotional health and wellbeing. The letter suggests that local Public Health teams have a critical role to play in developing licensing authorities' Statement of Principles as they have a good understanding of health issues within a local authority area.

13.8 Although Local Public Health Departments are not Responsible Authorities the licensing authority will seek advice from the local Public Health team in order to assess applications and this statement of principles. This approach will be taken to assist the licensing authority in exercising its own functions as a responsible authority, and reflects the comments made in the guidance.

14. The Borough of Watford

14.1 Watford Borough Council is situated in the county of Hertfordshire, which contains ten district councils in total. The council area has a population of now 96,600 (mid-year estimate 2016) making it one of the smallest in the county in terms of population and one of the most densely populated in the country.

14.2 Watford Borough was granted a Royal Charter in 1922. Traditionally a market town, it has developed into an attractive sub-regional shopping centre and is an important centre for cultural and recreational facilities. Watford has a catchment area population of approximately 500,000 within a travel time of 20 minutes from the town centre (CACI Ltd 2001).

14.3 Situated in the south west of Hertfordshire, Watford has several locational advantages due to its excellent communication links. The M1 motorway, with direct links to the town centre, and the London to Glasgow railway pass through the Borough. London Euston can be reached in 20 minutes, while the nearby M25 motorway has enhanced road access to the major airports at Heathrow, Gatwick, Stansted and Luton.

14.4 Watford has major A-road links to adjoining areas and is also connected to the underground rail network with the Metropolitan Line terminus adjacent to Cassiobury Park. A branch line railway serves St. Albans Abbey.

14.5 Watford Borough covers an area of 2,142 hectares (8.3 sq. miles). Watford is a major town in the region. It is a sub-regional shopping destination, centered around the Atria Shopping Centre in the town centre, and has one of the most vibrant night-time economies in Hertfordshire. Upgrading works to the pond and surrounding area were completed in 2014, and improvement works to the intu centre and associated High Street improvement works were completed late 2018 and early 2019. It was traditionally a centre for the printing industry and now boasts the headquarters of a number of nationally known firms. Unemployment figures are well below Great Britain's average. However, there are pockets of deprivation, characterised by a high concentration of minority ethnic groups, single parent families, low-income households and a high incidence of long-term health problems.

14.6 Potential operators should however refer to the District Plan and the emerging Local Development Framework (through our Development Management Team or on our website at www.watford.gov.uk) for details about the local planning authority's approach to granting planning permission for developments where such activities may take place.

14.7 Further information about the Borough is contained in the Watford Local Plan 2006-2031 Part 1 Core Strategy which can be obtained from the Council's offices or at:

https://www.watford.gov.uk/info/20012/planning_and_building_control/1051/watford_local_plan

14.8 In September 2008 we launched a 24-hour strategy for the town centre and following public consultation, we began to tackle some key issues which are now being addressed. In January 2009 we launched our Cultural Study to remodel the town centre – particularly The Parade – to act as a stimulating focal point for culture and heritage within the borough. The Cultural Plan saw physical improvements to the Pond and the Parade area and the creation of an events space; works which were completed in 2014.

14.9 The events space has seen events such as the Big Beach, the Big Screen and the Big Skate, and the Town Centre as a whole has hosted an 'Imagine Watford' Arts festival on a number of occasions. The council has adopted a Cultural Strategy to run from 2018 until 2025 which seeks to grow sustainable opportunities for creative enterprise, cultural provision, and participation for our local communities. The council is also working on a Town Centre Vision, which will build on the extension to the shopping centre and the associated improvement works to the High Street between Clarendon Road and Market Street. This statement of principles will be used to help deliver the Town Centre Vision and accordingly may need to be reviewed before its expiry in 2025 as the Vision develops.

14.10 This approach and initiatives above led to us being awarded Purple Flag accreditation for our management with our partners of our town centre night-time economy in September 2012. The Purple Flag accreditation was renewed in 2016, and again in 2018. The accreditation was due to be reconsidered in 2020, but was delayed due to the Covid-19 pandemic.

14.11 As of 6 April 2016, it is a mandatory condition for holders of operating licenses to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of principles and reference the authority's Local Area Profile where there is one. Licensees must share their risk assessment with the Council when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise at the request of the Council.

14.12 It is not a requirement for licensing authorities to complete a Local Area Profile. Although the council has not completed a Local Area Profile, we encourage operators to contact the licensing authority to consider and identify potential areas of mutual concern affecting their business in a way that aims to permit gambling without presenting risks to the licensing objectives, as required by the Gambling Act.

14.13 Licensing authorities are required by the Gambling Act 2005 to publish a statement of the principles which they proposed to apply when exercising their functions. This statement must be published at least every three years. The statement must also be reviewed from 'time to time' and any amended parts re-consulted upon. The statement must be then re-published.

15. Responsible Authorities

15.1 These are generally public bodies that must be notified of all applications and who are entitled to make representations to the council if they are relevant to the licensing objectives.

Section 157 of the Act defines those authorities as:

- the Gambling Commission
- the Police
- the Fire Service
- a competent body to advise the authority about the protection of children from harm
- the local planning authority
- Environmental Health
- HM Revenue and Customs
- a licensing authority in whose area the premises is situated (that is, the council itself and also any adjoining council where premises straddle the boundaries between the two).

15.2 Although Local Public Health Departments are not responsible authorities the licensing authority will seek advice from the local Public Health team in order to assess applications and its statement of principles. This approach will be taken to assist the licensing authority in exercising its own functions as a responsible authority.

15.3 Any concerns expressed by a responsible authority in relation to their own functions cannot be taken into account unless they are relevant to the application itself and the licensing objectives. In this regard the council will not generally take into account representations which are deemed to be irrelevant, such as:

- there are too many gambling premises in the locality (because need for gambling facilities cannot be taken into account)

- the premises are likely to be a fire risk (because public safety is not a licensing objective)
- the location of the premises is likely to lead to traffic congestion (because this does not relate to the licensing objectives)
- the premises will cause crowds to congregate in one area causing noise and nuisance (because other powers are generally available to deal with these issues. It should be noted that, unlike the Licensing Act 2003, the Gambling Act does not include as a specific licensing objective the prevention of public nuisance. Any nuisance associated with gambling premises should be tackled under other relevant laws).

Each representation will, however, be considered on its own individual merits.

16. Child protection

16.1 The licensing authority is required by regulations to state the principles it will apply in exercising its powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The principles are:

- the need for the body to be responsible for an area covering the whole of the licensing authority's area
- the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group etc.

16.2 In accordance with the above principles, the licensing authority designates the Hertfordshire Safeguarding Children Partnership for this purpose.

16.3 The contact details of all the responsible authorities under the Gambling Act 2005 are available via the council's website at www.watford.gov.uk. From time-to-time the Secretary of State may prescribe other responsible authorities by means of regulations.

17. Interested parties

17.1 Interested parties can make representations about licence applications or apply for a review of an existing licence. These parties are defined in the Gambling Act 2005 as follows:

“For the purposes of this Part a person is an interested party in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the applications is made, the person -

- a) lives sufficiently close to the premises to be likely to be affected by the authorities' activities
- b) has business interests that might be affected by the authorised activities, or
- c) represents persons who satisfy paragraph (a) or (b)”

17.2 The licensing authority is required by regulations to state the principles it will apply in exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party. The principles are:

- each case will be decided upon its merits. This authority will not apply a rigid rule to its decision making. In the case of doubt, the benefit will be given to the party making the representation until the contrary can be shown.
- interested parties can include trade associations, and residents'/tenants' associations, providing that they can show they represent someone who would be classed as an interested party in their own right. Councillors and MPs may also be interested parties. Elected councillors may represent interested parties, providing they do not also sit on the Licensing sub-committee determining the application in question.
- In determining whether someone lives sufficiently close to a particular premises as to likely to be affected by the authorised activities, or has business interests likely to be affected, the council may take account of:
 - the size of the premises
 - the nature of the premises
 - the nature of the authorised activities being proposed
 - the distance of the premises from the person making the representation
 - the characteristics of the complainant (including any special interests or knowledge relating to the application in question)
 - the potential impact of the premises

17.3 The licensing authority will not consider representations that are frivolous or vexatious, or which relate to demand or need for gambling facilities. Decisions on whether representations are frivolous or vexatious will be made objectively and not on the basis of any political judgement. Where representations are rejected, the person making that representation will be given a written reason. A report will be made to the licensing sub-committee determining the application (if appropriate), indicating the general grounds of the representation and the reason it was rejected.

17.4 A vexatious representation is generally taken to be one which is repetitive, without foundation or made for some other reason such as malice. A frivolous representation is generally taken to be one that is lacking in seriousness, or is unrelated to the licensing objectives, the guidance issued by the Gambling Commission or this statement of licensing policy.

17.5 Interested parties should appreciate that moral objections to gambling, or the need for gambling premises, are not valid reasons to reject applications for premises licences.

17.6 Representations must be made in writing and must:

- indicate the name and address of the person or organisation making the representation
- indicate the premises to which the representation relates
- indicate the proximity of the premises to the person making the representation. A sketch map or plan may be helpful to show this
- clearly set out the reasons for making the representation. Reference to a specific licensing objective may be helpful.

18. Exchange of Information

18.1 Licensing authorities are required to include in their policy statement the principles to be applied by the authority in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information between it and the Gambling Commission, and the functions under section 350 of the Act with respect to the exchange of information between it and the other persons listed in Schedule 6 to the Act.

18.2 The principle that this licensing authority applies is that it will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information which includes the provision that the General Data Protection Regulations and the Data Protection Act 2018 will not be contravened. The licensing authority will also have regard to Guidance issued by the Gambling Commission to Local Authorities, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

18.3 The authority may from time to time exercise its' powers under section 115 of the Crime and Disorder Act 1998 to exchange data and information with the Police and other partners to fulfil its' statutory objective of reducing crime in the area.

18.4 Details of applications and representations which are referred to a Licensing sub-Committee for determination will be published in reports that are made publicly available in accordance with the Local Government Act 1972 and the Freedom of Information Act 2000. Personal details of people making representations will be disclosed to applicants and only be withheld from publication on the grounds of personal safety where the licensing authority is asked to do so.

19. Compliance and Enforcement

19.1 Licensing authorities are required by regulation under the Gambling Act 2005 to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.

19.2 This licensing authority's principles are that it will be guided by the Gambling Commission's Guidance for local authorities, and it will endeavour to be:

- proportionate: it will only intervene when necessary, remedies will be appropriate to the risk posed, and costs identified and minimised
- accountable: with decisions being justifiable, and be subject to public scrutiny
- consistent: rules and standards will be joined up and implemented fairly
- transparent and open: licence conditions will be kept simple and user friendly; and
- targeted: regulation should be focused on the problem and minimise side effects.

19.3 The licensing authority will avoid duplication with other regulatory regimes. Where matters come to light which are properly the role of other statutory agencies however, the licensing authority may bring those matters to the attention of those other agencies where appropriate.

19.4 The licensing authority notes the Commission's risk-based inspection programme, based on:

- the licensing objectives
- relevant codes of practice issued by the Gambling Commission
- guidance issued by the Gambling Commission, in particular at Part 36 of the Guidance to Local Authorities
- the principles set out in this statement of licensing policy.

19.5 The licensing authority has an established working partnership with the Gambling Commission and undertakes risk-based inspections and compliance visits.

19.6 The main enforcement and compliance role for this licensing authority in terms of the Gambling Act 2005 will be to ensure compliance with the premises licences and other permissions which is authorised. Enforcement involves taking formal action where either those requirements are not met, or illegal activities take place.

19.7 The Gambling Commission will be the enforcement body for operator and personal licences. It is also worth noting that concerns about manufacture, supply or repair of gaming machines will not be dealt with by the licensing authority but will be notified to the Gambling Commission.

19.8 We have a long-established compliance policy based around the principles of consistency, transparency and proportionality set out in the Government's statutory Regulators' Code.

19.9 Our compliance policy proposes that a graduated response is taken where offences against licensing legislation are found or where licence conditions have been contravened. An isolated and minor offence may be dealt with purely by way of a written warning whilst more serious offences which have either been committed over a period of time or which jeopardise public safety may result in a referral for prosecution.

19.10 We continue to work actively with other responsible authorities in enforcing licensing legislation. We share information about licence-holders and licensed premises under the Crime and Disorder Act 1998 and expect to be closely consulted when any enforcement action may be required.

19.11 The Council will consult with the Gambling Commission before planning any test purchasing and age verification exercises in order to ensure that there is no conflict between any ongoing investigation or enforcement activity related to either the premises or the operator that the Commission has initiated.

19.12 As a council we have also signed up to the Hertfordshire Better Business for All Partnership Charter which is a voluntary undertaking between Hertfordshire Regulatory Services and all local businesses, irrespective of size or resources. It aims to support a relationship between businesses and regulators built upon trust, understanding and a desire to improve together in terms of compliance with regulation and support of business growth.

19.13 The authority's approach to the carrying out of premises licence reviews is set out in chapter 17.

PART B

PREMISES LICENCES

20. Definition of premises licences

20.1 Premises are defined in the Act as “any place”. It is for the licensing authority to decide whether different parts of a building can be properly regarded as being separate premises and it will always be a question of fact in the circumstances. The Gambling Commission does not however consider that areas of a building that are artificially or temporarily separated can be properly regarded as different premises.

20.2 In considering applications for multiple licences for a building or those for a specific part of the building to be licensed, entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised, and that people do not ‘drift’ into a gambling area.

20.3 This licensing authority will also pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed).

20.4 The licensing authority takes particular note of the Commission’s guidance to be aware of the following:

- the third licensing objective seeks to protect children from being harmed or exploited by gambling and premises should be configured so that children are prohibited from participating in gambling, such that they are not invited to participate in, have accidental access to, or closely observe gambling
- entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised, and people do not ‘drift’ into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit. The council would expect the plan of the premises to clearly denote entrances and exits.
- customers should be able to participate in the activity named on the premises licence.

20.5 The licensing authority will take account of the following factors when considering whether premises are separate:

- do the premises have a separate registration for business rates?
- is the neighbouring premises owned by the same person or by someone else?
- can each of the premises be accessed from the street or a public passageway?
- can the premises only be accessed from any other gambling premises?

20.6 The location of the premises and the suitability of the division (including the nature of any partitions etc) will be a matter for discussion in each case between the applicant and the licensing authority’s officers.

20.7 The licensing authority notes the Commission's guidance at paragraphs 7.19 – 7.23 states: Where more than one premises licence is permitted within a building the gaming machine entitlement for the separately licensed premises may not be aggregated and no more than the permitted number and category of machines for the relevant type of premises may be placed in any one of the individual sets of premises within the building. Section 152, when properly applied, means that different premises licences cannot apply in respect of single premises at different times. There is no temporal element to a premises licence. Therefore, premises cannot, for example, be licensed as a bingo club on weekdays and a betting shop at weekends.

21. Provisional Statements

21.1 In terms of representations about premises licence applications, following the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless they concern matters which could not have been addressed at the provisional statement stage, or they reflect a change in the applicant's circumstances. In addition, the authority may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- which could not have been raised by objectors at the provisional licence stage; or
- which, in the authority's opinion, reflect a change in the operator's circumstances
- where the premises has not been constructed in accordance with the plan and information submitted with the provisional statement application. In accordance with the guidance, there must be substantial changes to the plan in order for such a decision to be made, and each decision will take into account the merits of the individual application. The council will discuss any concerns of this nature with the applicants before making a decision

21.2 The Guidance states that a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use. If the construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them, then an application for a provisional statement should be made instead. In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, this authority will determine applications on their merits, applying a two-stage consideration process:

- first whether the premises ought to be permitted to be used for gambling
- second, whether appropriate conditions can be in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

21.3 Applicants should note that this authority is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence. More detailed examples of the circumstances in which such a licence may be granted can be found at paragraphs 7.58 – 7.65 of the Guidance to Licensing Authorities.

22. Location

22.1 The licensing authority is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can. The authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

22.2 Should any specific policy be decided upon as regards areas where gambling premises should not be located, this policy statement will be updated. It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how the concerns can be overcome. Reference should also be made to the local area risk assessment prepared by the operator.

23. Duplication with other regulatory regimes

23.1 This authority will seek to avoid any duplication with other statutory/regulatory systems where possible, including planning. This authority will not consider whether a licence application is likely to be awarded planning or building consent, in its consideration of it. This authority will though listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise.

23.2 Under section 210 of the Act the licensing authority is not entitled to have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with the law relating to planning or building. The licensing authority will however consider relevant representations from the local planning authority about the effect of the grant of a premises licence on an extant planning permission where this relates to the licensing objectives, a Commission code of practice, or this statement of principles.

24. Licensing objectives

24.1 The grant of a Premises licences must be reasonably consistent with the licensing objectives.

25. Conditions

25.1 Any conditions attached to licences will be proportionate and will be:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises and the type of licence applied for
- fairly and reasonably related to the scale and type of premises: and
- reasonable in all other respects.

25.2 Decisions upon individual conditions will be made on a case-by-case basis, although there will be a number of control measures this licensing authority may utilise should the authority consider it necessary for the promotion of the licensing objectives, such as the use of machine and door supervisors, supervision of adult gaming machines, appropriate signage for adult-only areas, staff training etc. There are specific comments made in this regard under each of the licence types below. This

licensing authority will also expect the licence applicant to offer their own suggestions as to ways in which the licensing objectives can be met effectively.

25.3 The licensing authority will expect applicants to be able to comply with any mandatory conditions imposed on their premises licence through regulations made by the Secretary of State. The licensing authority will expect applicants to be able to comply with any default conditions similarly imposed. Applicants seeking to remove or amend default conditions must demonstrate that there will be little or no risk to the licensing objectives or the licensing authority's statement of principles by removing the default conditions.

25.4 It is noted that there are conditions which the licensing authority cannot attach to premises licences:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition
- conditions relating to gaming machine categories, numbers, or method of operation
- conditions which provide that membership of a club or body be required
- conditions in relation to stakes, fees, winning or prizes.

25.5 An application for a premises licence may only be made by persons (which includes companies or partnerships):

- who are aged 18 or over and
- who have the right to occupy the premises and
- who have an operating licence which allows them to carry out the proposed activity. or
- who have applied for an operating licence to allow them to carry out the proposed activity. (The premises licence cannot be determined until an operating licence has been issued).

26. Door Supervisors

26.1 The Gambling Commission advises in its Guidance for local authorities that licensing authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime.

26.2 There is no evidence that the operation of betting offices has required door supervisors for the protection of the public. The licensing authority will make a door supervision requirement only if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and that door supervision is both necessary and proportionate.

26.3 It is noted though that the Gambling Act 2005 has amended the Security Industry Act 2001 and that in-house door supervisors at casinos or bingo premises need not be licensed by the Security Industry Authority. However, the licensing authority strongly recommends that any door supervisors or security staff who are employed should be licensed by the SIA.

27. Adult Gaming Centres

27.1 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18-year-olds do not have access to the premises. Appropriate licence conditions may cover issues such as:

- proof of age schemes
- CCTV
- supervision of entrances/ machine areas
- physical separation of areas
- location of entry
- notices/signage
- specific opening hours
- staff training
- change machines
- advertising sources of help and other means of help for problem gamblers

This list is not mandatory or exhaustive and is merely indicative of example measures.

27.2 The licensing authority will expect applicants to be able to comply with any mandatory conditions imposed on their premises licence through regulations made by the Secretary of State. The licensing authority will expect applicants to be able to comply with any default conditions similarly imposed. Applicants seeking to remove or amend default conditions must demonstrate that there will be little or no risk to the licensing objectives or the licensing authority's statement of principles by removing the default conditions.

27.3 As regards the protection of vulnerable persons, this licensing authority will consider measures such as the use of self-barring schemes, provision of information leaflets or helpline numbers for organisations such as GamCare.

28. Licensed Family Entertainment Centres

28.1 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18-year-olds do not have access to the adult only gaming machine areas. Appropriate licence conditions may cover issues such as:

- proof of age schemes
- CCTV
- door supervisors
- supervision of entrances and/or machine areas
- physical separation of areas
- location of entry
- notices / signage
- specific opening hours
- staff training

This list is not mandatory or exhaustive and is merely indicative of example measures.

28.2 Measures such as the use of self-barring schemes, provision of information leaflets or helpline numbers for organisations such as GamCare will be considered in order to protect children and vulnerable persons.

28.3 The licensing authority will expect applicants to be able to comply with any mandatory conditions imposed on their premises licence through regulations made by the Secretary of State. The licensing authority will expect applicants to be able to comply with any default conditions similarly imposed. Applicants seeking to remove or amend default conditions must demonstrate that there will be little or no risk to the licensing objectives or the licensing authority's statement of principles by removing the default conditions.

29. Casinos

29.1 The licensing authority has passed a "no casino" resolution under section 166 of the Act on 12th October 2021, to be in effect from 6 January 2022.

30. Bingo premises

30.1 Bingo is a class of equal chance gaming and will be permitted in alcohol licensed premises and in clubs provided it remains below a certain threshold, otherwise it will be subject to a bingo operating licence which will have to be obtained from the Gambling Commission.

30.2 The holder of a bingo operating licence will be able to provide any type of bingo game including cash and prize bingo.

30.3 Commercial bingo halls will require a bingo premises licence from the licensing authority.

30.4 Amusement arcades providing prize bingo will require a prize gaming permit from the council.

30.5 In each of the above cases it is important that where children are allowed to enter premises licensed for bingo, in whatever form, they are not allowed to participate in any bingo game, and they are only allowed to game on category D machines. When considering applications of this type the council will therefore take into account, among other things, the location of the games or machines, access to those areas, general supervision of the premises and the display of appropriate notices.

30.6 A limited number of gaming machines may also be made available at bingo licensed premises. Where category C or above machines are available in premises to which children are admitted, the licensing authority will seek to ensure that:

- all such machines are located in an area of the premises separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance
- only adults are admitted to the area where these machines are located
- access to the area where the machines are located is supervised
- the area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder and
- at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

30.7 The licensing authority notes that the Gambling Commission's Guidance states:

- 18.5 Licensing authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bingo premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises.
- 18.7 Children and young people are allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5(3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.
- 18.9 The gaming machines must remain within the licensed area covered by the premises licence. In the unusual circumstance that an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises) it is not permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises.
- 18.10 Equipment operated by a bingo operating licence for the purpose of playing bingo, for example what are currently known as mechanised cash bingo, electronic bingo terminal (EBTs) and video bingo terminals (VBTs), will be exempt from controls on gaming machines provided they comply with any conditions set by the Commission and, in the case of EBTs, do not hold gaming machine content.
- 18.11 An EBT that offers gaming machine content in addition to bingo content is considered to be a gaming machine and would count towards the total number of gaming machines or towards the offering of bingo. Any EBTs that do not offer gaming machine content would not count towards the number of gaming machines.

30.8 The licensing authority will expect applicants to be able to comply with any mandatory conditions imposed on their premises licence through regulations made by the Secretary of State. The licensing authority will expect applicants to be able to comply with any default conditions similarly imposed. Applicants seeking to remove or amend default conditions must demonstrate that there will be little or no risk to the licensing objectives or the licensing authority's statement of principles by removing the default conditions.

30.9 Operators' attention is also drawn to paragraph 18.25 – 18.32 concerning primary gambling activity and the location of gaming machines.

31. Bingo in clubs and alcohol-licensed premises

31.1 Bingo may be provided on alcohol-licensed premises and in members' clubs and miners' welfare institutes either in accordance with a permit or providing that the limits in section 275 of the Act are complied with. These restrictions limit the aggregate stake or prizes within any seven days to £2000 and require the Commission to be notified as soon as is reasonably practicable if that limit is breached. Stakes or prizes above that limit will require a bingo operator's licence and the corresponding personal and premises licences.

32. Betting premises

32.1 Anyone wishing to operate a betting office will require a betting premises licence from the licensing authority. Children and young persons will not be able to enter premises with a betting premises licence.

32.2 The authority recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are recognised and resolved at the earliest stage, operators are requested to give the authority a single named point of contact, who should be a senior individual, and whom the authority will contact first should any compliance queries or issues arise.

32.3 There is no evidence that the operation of betting offices has required door supervisors for the protection of the public. The Authority will make a door supervision requirement only if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and that door supervision is both necessary and proportionate.

32.4 Betting premises will be able to provide a limited number of gaming machines and some betting machines.

32.5 The licensing authority has the power to restrict the number of betting machines, their nature and the circumstances in which they are made available. We will take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people. It will not generally exercise this power though unless there are good reasons to do so taking into account, among other things, the size of the premises and the level of management and supervision especially where vulnerable people are concerned.

32.6 The licensing authority will expect applicants to be able to comply with any mandatory conditions imposed on their premises licence through regulations made by the Secretary of State. The licensing authority will expect applicants to be able to comply with any default conditions similarly imposed. Applicants seeking to remove or amend default conditions must demonstrate that there will be little or no risk to the licensing objectives or the licensing authority's statement of principles by removing the default conditions.

32.7 Each application will be considered on its own individual merits.

33. Primary Gambling Activity

33.1 Operating licences issued by the Commission provide that gaming machines may be made available for use in licensed betting premises in combination with the named activity on the operating licence.

33.2 The licensing authority must be satisfied that a premises applying for a premises licence to permit betting, or a premises which is already licensed to provide betting, is or will operate in a manner which a customer would reasonably expect to recognise as a premises licensed for the purposes of providing facilities for betting. In this respect, the authority would expect such facilities to include information that enables customers to access details of events on which bets can be made, make such bets, learn the outcome and collect any winnings. Where betting facilities are provided only by betting machines the number of betting machines must exceed the number of gaming machines made available for use.

33.3 The Licence Conditions and Codes of Practice (LCCP) sets out the full requirements on operators. To assist operators of betting premises the Commission has published a document setting out the indicators that are used to assess as to whether the requirements for betting being the primary gambling activity in any particular premises are being met.

33.4 Should the licensing authority receive an application to vary a premises licence for bingo or betting in order to extend the opening hours, the authority will satisfy itself that the reason for the application is in line with the requirements on primary gambling activity. (i.e. the need for operating licence holders to ensure that there are still sufficient facilities available to participate in the gambling activity appropriate to the licence type ('the primary activity' or 'the principal activity') at those premises and not replaced by the making available of gaming machines). Therefore, the applicant should be able to demonstrate that the extension of the opening hours is not designed solely to benefit from the machine entitlement and activity which is ancillary to the primary activity of the premises, namely betting or bingo.

34. Tracks

34.1 Only one premises licence can be issued for any particular premises at any time unless the premises is a 'track'. A track is a site where races or other sporting events take place.

34.2 Track operators are not required to hold an 'operator's licence' granted by the Gambling Commission. Therefore, premises licences for tracks, issued by the council are likely to contain requirements for premises licence holders about their responsibilities in relation to the proper conduct of betting. Indeed, track operators will have an important role to play, for example in ensuring that betting areas are properly administered and supervised.

34.3 There are various types of betting which take place in relation to tracks:

- On-course betting, where the operator comes onto the track, temporarily, while races or sporting events are taking place, and tend to offer betting only on the events taking place on the track, that day.
- Betting counters or kiosks, which may be a permanent or temporary outlet from which a bookmaker provides betting facilities.
- Mobile betting machines (often handheld) operated by employees of betting operators allow customers to place a bet or receive payouts away from betting kiosks or the betting ring.

- Self-service betting terminals (SBBTs).
- Pool betting, which involves the pooling of stakes on a given event, and the splitting of the total pool, less a commission for the operator amongst the winners. Pool betting at horseracing and greyhound tracks can be offered under a pool betting operating licence – be that the owner of the track or a third-party provider. Tracks may also conduct inter-track pool betting when other tracks are holding races.
- Off-course betting; typically operators who provide betting facilities from betting premises such as those found on the high street. In addition to such premises, betting operators may operate self-contained betting premises or designated areas such as a row of betting kiosks within the track premises.

34.4 The provision of off-course betting facilities as described above is generally conducted in reliance on the track premises licence held by the occupier of the track and consequently the off-course operator is prohibited from making any gaming machines available for use unless they hold a separate betting premises licence in relation to part of the track. The track premises licence holder will need to vary their existing premises licence so that it does not have effect in relation to the area where the additional betting premises licence is located. The additional betting premises licence would need to be secured by the holder of an appropriate betting operating licence.

34.5 A betting premises licence in respect of a track may not authorise pool betting to take place, other than in respect of dog or horse racing and only where the acceptance of bets is by the holder of the betting premises licence, or in accordance with arrangements made by them. In the case of dog racing, this preserves the existing arrangements at dog tracks where the totalisator is operated by or on behalf of the occupier of the track. Additionally, pool betting on a licensed greyhound track will only be permitted while the public are admitted to the track for the purpose of attending greyhound races, and no other sporting events are taking place. A mandatory condition must be attached to the premises licence to this effect.

34.6 There may be a number of subsidiary licences authorising other gambling activities to take place for specific parts of the premises. Unlike betting offices, a betting premises licence in respect of a track does not give an automatic entitlement to use gaming machines.

34.7 When considering whether to exercise its power to restrict the number of betting machines at a track the licensing authority will consider the circumstances of each individual application and, among other things will consider the potential space for the number of machines requested, the ability of track staff to supervise the machines, especially if they are scattered around the site, and the ability of the track operator to prevent children and young persons and vulnerable people betting on the machines.

34.8 This licensing authority is aware that the Gambling Commission may provide further specific guidance as regards tracks. We have taken note of the Guidance from the Gambling Commission which highlights that tracks are different from other premises in that there may be more than one premises licence in effect and that the track operator may not be required to hold an operator licence as there may be several premises licence holders at the track which will need to hold their own operator licences.

34.9 There may be some specific considerations with regard to the protection of children and vulnerable persons from being harmed or exploited by gambling and this authority would expect the premises licence applicants to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog-racing and/or horse racing takes place, although they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

34.10 The law wholly prohibits the employment of children and young people on tracks.

34.11 Appropriate licence conditions may be:

- proof of age schemes
- CCTV
- supervision of entrances/machine areas
- physical separation of areas
- location of entry
- notices/signage
- specific opening hours
- the location of gaming machines

This list is not mandatory or exhaustive and is merely indicative of example measures.

34.12 Measures such as the use of self-barring schemes, provision of information leaflets and helpline numbers for organisations such as GamCare will be considered suitable in relation to the protection of children and vulnerable people.

34.13 The licensing authority will expect applicants to be able to comply with any mandatory conditions imposed on their premises licence through regulations made by the Secretary of State. The licensing authority will expect applicants to be able to comply with any default conditions similarly imposed. Applicants seeking to remove or amend default conditions must demonstrate that there will be little or no risk to the licensing objectives or the licensing authority's statement of principles by removing the default conditions.

34.14 This licensing authority would prefer for all self-contained premises operated by off-course betting operators on tracks to be the subject of separate premises licences. This would ensure that there was clarity between the respective responsibilities of the track operator and the off-course betting operator running a self-contained unit on the premises.

35. Betting machines at tracks

35.1 Licensing authorities have a power under the Gambling Act 2005 to restrict the number of betting machines, their nature and the circumstances in which they are made available, by attaching a licence condition to a betting premises licence.

36. Condition on rules being displayed

36.1 It is a mandatory condition of premises licence that clear and accessible information about the terms on which a bet may be placed must be displayed at betting

premises, including tracks. The licensing authority will adopt the approach in line with guidance from the Gambling Commission that it may be disproportionate and unnecessary to display betting rules at each distinct betting location. The licensing authority will expect betting rules to be accessible to all customers, regardless of which area of the track they are in, and the track premises licence holder should make necessary arrangements to ensure to achieve this aim. This could include displaying rules at various parts of the track if certain areas are restricted to specific customers, or that other measures are taken to ensure that they are made available to the public, such as being could printed in the race-card or made available in leaflet form from the track office.

37. Travelling Fairs

37.1 It will fall to the licensing authority to decide whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

37.2 The licensing authority will also consider whether the applicant falls within the statutory definition of a travelling fair.

38. Review of Premises Licences

38.1 Requests for a review of a premises licence can be made by interested parties or responsible authorities.

38.2 However, it is for the licensing authority to decide whether to accept any application for review of a licence, after considering whether the application is:

- frivolous, vexatious, will certainly not cause this authority to wish to alter/revoke/suspend the licence, or substantially the same as previous representations or requests for review;
- in accordance with any relevant code of practice issued by the Gambling Commission;
- in accordance with any relevant guidance issued by the Gambling Commission;
- reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of principles.

38.3 In the interest of fairness, responsible authorities (including the licensing authority) are encouraged to give an early warning of concerns about problems identified at premises concerned and of the need for improvement, although it is recognised this is not always practicable or desirable. It is expected that a failure to respond to such warnings would lead to a decision to apply for a review.

38.4 Any enforcement action taken by the licensing authority, including considering a review, will be undertaken in accordance with our compliance policy.

38.5 Licensing authority officers may be involved in the initial investigations of complaints leading to a review, or may try informal mediation or dispute resolution before a full review is conducted.

38.6 The licensing authority may review premises licences of its own volition on the basis of any reason which it thinks is appropriate. This may be on the grounds that a

premises licence holder has not provided facilities for gambling at the premises. This can extend to a review of a class of licences where it considers particular issues have arisen.

38.7 The purpose of a review is to determine whether the licensing authority should take any action in relation to the licence. If action is justified the licensing authority may:

- add, remove or amend a licence condition (other than a mandatory condition)
- exclude or amend a default condition imposed by regulations
- suspend the premises licence for a period not exceeding three months
- revoke the premises licence.

38.8 In determining the appropriate course of action, the licensing authority must have regard to the principles set out in section 153 of the Act as well as any relevant representations.

38.9 The licensing authority must have reasonable grounds in order to take action to amend, refuse, suspend or revoke a licence. In every case, an evidentiary basis for the review will need to be laid before the licensing authority.

PART C

PERMITS, TEMPORARY AND OCCASIONAL USE NOTICES

39.1 The Council can approve temporary and occasional use notices. These enable licensing authorities to authorise premises that are not licensed generally for gambling purposes, to be used for certain types of gambling for limited periods.

Unlicensed Family Entertainment Centre gaming machine permits

39.2 Where a premises does not hold a premises licence but wishes to provide category D machines only gaming machines, it may apply to the licensing authority for this permit. It should be noted that under section 238 the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use. If they are also used for other purposes the application is likely to be refused.

39.3 The Act states that a licensing authority may prepare a statement of principles that they propose to consider in determining the suitability of an applicant for a permit. In preparing that statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission under section 25 of the Act.

39.4 Accordingly this licensing authority will also have regard to the licensing objectives when considering applications relating to unlicensed FEC permits.

39.5 An FEC gaming machine permit cannot be granted unless the chief officer of Police has been consulted, and no conditions may be imposed upon the grant of a permit. Therefore, the licensing authority will wish to be satisfied as to the applicant's suitability before granting a permit. Unlicensed FECs, by definition, will not be subject to scrutiny by the Gambling Commission as no operating (or other) licences will be applied for and issued.

40. Statement of principles

40.1 Applicants will be expected to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits, however, they may include background checks on staff, training for staff in dealing with unsupervised very young children being on the premises, or children causing perceived problems on or around the premises.

40.2 Applicants will be expected to demonstrate:

- a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs
- that the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act)
- that staff are trained to have a full understanding of the maximum stakes and prizes; and
- an awareness of local school holiday times and how to identify to the local education authority should truants be identified.

40.3 Compliance with any relevant industry Code of Practice for FECs issued by BACTA or other trade associations may be taken by the licensing authority as evidence that (apart from the criteria relating to criminal convictions) the applicant has met the above.

40.4 Applicants must submit with their application a copy of a plan of the premises, to a scale of 1:100, showing the exits/entrances to the premises, location of gaming machines, and the location of safety equipment such as fire extinguishers.

40.5 The licensing authority may refuse an application for renewal of a permit only on the grounds that an authorised local authority officer has been refused access to the premises without reasonable excuse, or that renewal would not be reasonably consistent with pursuit of the licensing objectives.

41. (Alcohol) Licensed premises gaming machine permits

41.1 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have two gaming machines, of categories C and/or D. The premises merely need to notify the licensing authority. The notification process is prescribed under the Gambling Act.

41.2 Under section 284 the licensing authority can remove the automatic authorisation in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives
- gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (for example the gaming machines have been made available in a way that does not comply with requirements on the location and operation of gaming machines)
- the premises are mainly used for gaming; or
- an offence under the Gambling Act has been committed on the premises.

41.3 Should it be necessary to issue a section 284 order, the licence-holder will be given at least twenty-one days' notice of the intention to make the order and consider any representations which might be made. The authority will hold a hearing if the licensee requests.

41.4 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and "such matters as they think relevant."

42. Statement of principles

42.1 This licensing authority considers that such matters will be decided on a case-by-case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18-year-olds do not use the adult-only gaming machines. The authority will take into account whether access by children to the premises under the Licensing Act 2003 is restricted or not.

42.2 Measures which will satisfy the authority that there will be no access may include the adult machines being in site of the bar, or in the sight of staff that will monitor that the machines are not being used by those under 18. Notices and signage may also be help. As regards the protection of vulnerable persons applicants may wish to consider the provision of information leaflets/helpline numbers for organisations such as GamCare.

42.3 A plan must accompany applications indicating where, and what type, of gambling machines are to be provided. This plan may take the form of an amendment to the plan attached to the premises licence issued under the Licensing Act 2003.

42.4 It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would need to be applied for, and dealt with, as an application for a new premises licence.

42.5 It should be noted that the licensing authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.

42.6 It should also be noted that the holder of a permit to must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

43. Administrative matters

43.1 Notifications and applications for fewer than five machines shall be dealt with by the licensing authority's officers.

43.2 Applications for five or more machines will be referred to a licensing sub-committee of councillors, unless there are no representations and officers are satisfied that the licensing objectives will be promoted. In these situations, notifications and applications will be dealt with by the licensing authority's officers.

44. Prize Gaming Permits

44.1 The licensing authority may prepare a statement of principles which they propose to apply in exercising their functions which may, in particular, specify matters that the licensing authority propose to consider in determining the suitability of the applicant for a permit.

44.2 Prize gaming may be provided in bingo premises as a consequence of their bingo operating licence. Any type of prize gaming may be provided in adult gaming centres and licensed family entertainment centres. Unlicensed family entertainment centres may offer equal chance prize gaming under a gaming machine permit. Prize gaming without a permit may be provided by travelling fairs, providing that none of the gambling facilities at the fair amount to more than an ancillary amusement. Children and young people may participate in equal chance gaming only.

44.3 In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives, but may wish to do so, but must have regard to any Gambling Commission guidance.

Applicants should set out the types of gaming they are intending to offer and should be able to demonstrate:

- that they understand the limits to stakes and prizes that are set out in Regulations
- and that the gaming offered is within the law.

44.4 The licensing authority cannot attach conditions to a permit.

44.5 Applications may only be made by people who occupy or plan to occupy the premises, are aged 18 or over (if an individual), and no premises licence or club gaming permit under the Gambling Act 2005 may be in force.

45. Statement of principles

45.1 This licensing authority considers that such matters will be decided on a case-by-case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18-year-olds do not have access to unequal chances prize gaming. The authority will take into account whether access by children to the premises under the Licensing Act 2003 is restricted or not.

45.2 A plan must accompany applications indicating where, and what type, of prize gaming is to be provided.

46. Club Gaming and Club Machines Permits

46.1 Members' clubs (but not commercial clubs) may apply for a club gaming permit or a clubs gaming machines permit.

46.2 The licensing authority notes paragraphs 25.44 – 25.49 of the Commission's Guidance as to matters to take into account when determining that a club meets the statutory qualifying requirements. These include the club's constitution; the frequency of gaming; and ensuring that there are more than 25 members. The club must be conducted "wholly or mainly" for purposes other than gaming, unless the gaming is in bridge and whist clubs covered by regulations made by the Secretary of State.

46.3 The licensing authority may only refuse an application on the grounds that:

- the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied
- the applicant's premises are used wholly or mainly by children and/or young persons
- an offence under the Act or a breach of the permit has been committed by the applicant whilst providing gaming facilities
- a permit held by the applicant has been cancelled in the previous ten years; or
- an objection has been raised by the Commission or by the **Police**.

47. Club gaming permit

47.1 A club gaming permit allows the premises to provide

- up to three machines of categories B, C or D
- equal chance gaming and

- games of chance as set out in regulations.

48. Club gaming machine permit

48.1 A club gaming machine permit will enable the premises to provide up to three machines of categories B, C or D.

48.2 The licensing authority will wish to be satisfied that applicants for these permits meet the statutory criteria for members' clubs contained in sections 266 and 267 of the Act. Clubs which hold a club premises certificate under the Licensing Act 2003 are entitled to benefit from a fast-track application procedure.

49. Temporary Use Notices

49.1 Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Gambling Commission would include hotels, conference centres and sporting venues.

49.2 The licensing authority can only grant a Temporary Use Notice to a person or company holding a relevant operating licence i.e. a non-remote casino operating licence.

49.3 The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices, and at the time of writing this statement the relevant regulations (SI no 3157: The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that temporary use notices may only be used to permit the provision of facilities for equal chance gaming, where the gaming is intended to produce a single overall winner. There can, however, be more than one competition with a single winner held at the individual event covered by a specific temporary use notice. The facilities may not be provided in circumstances where any person participating in the gaming does so by means of a gaming machine. Equal chance gaming is gaming which does not involve playing or staking against a bank and gives equally favourable chances to all participants. Examples of equal chance gaming include games such as backgammon, mah-jong, rummy, kalooki, dominoes, cribbage, bingo and poker.

49.4 There are a number of statutory limits as regards Temporary Use Notices. The meaning of "premises" in Part 8 of the Act is discussed in Part 7 of the Gambling Commission Guidance to Licensing Authorities and at paragraphs 14.10-14.13 of the Guidance. As with "premises", the definition of a "set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place". In considering whether a place falls with the definition of a "set of premises", the licensing authority need to look at, amongst other things, the ownership/occupation and control of the premises.

49.5 This licensing authority expects to object to notices where it appears that their effect would be to permit regular gambling in place that could be described as one set of premises, as recommended in the Gambling Commission's Guidance to Licensing Authorities.

50. Occasional Use Notices

50.1 An occasional use notice permits betting on a sporting event or race at a

track on eight days or fewer in a calendar year without the need for a full premises licence. The Secretary of State has the power to increase or decrease the number of occasional use notices that an operating licence holder could apply for each calendar year. OUNs therefore, allow temporary and infrequent events such as point-to-point racing to take place and for bets to be taken on the outcome.

50.2 'Day' is defined as midnight to midnight, so an event that starts on one calendar day and ends on the following day would count as two days.

50.3 OUNs are designed to allow licensed betting operators to provide betting facilities at genuine sporting events (such as point-to-point racecourses and golf courses for major competitions) within the boundaries of the identified venue on a specific date, without the need for a full betting premises licence.

50.4 An OUN must be served by a person who is responsible for the administration of events on the track or by an occupier of the track.

50.5 OUNs can only be relied upon for eight days or fewer in a calendar year and therefore the Council keep a record of the number of notices served in relation to each track. The period of eight days applies to the venue and not the individual who has submitted the notice. An OUN must be submitted for each day that betting activity will be conducted on the premises. If betting activity is to be held over a period of eight consecutive days, the operator will be required to submit eight separate notices.

50.6 The notice must specify the day on which it has effect. An event running past midnight and ending on the following day accounts for two occasional use days, even though in practice it is one event.

50.7 No objection or counter notice (refusal) is possible unless the maximum number will be exceeded.

50.8 Notice must be given to the licensing authority and the police, in writing, before the event starts.

50.9 No premises licence can exist for the place which is the subject of the notice.

50.10 Land can be used temporarily as a track, for example for a point-to-point race, provided that sporting events or races take place there. There is no need for a track to be permanently established.

50.11 The licensing authority has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The licensing authority will though need to consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

51. Small Society Lotteries

51.1 The licensing authority will adopt a risk-based approach towards its enforcement responsibilities for small society lotteries. This authority considers that the following list, although not exhaustive, could affect the risk status of an operator:

- submission of late returns (returns must be submitted within three months of the date that a lottery was drawn)
- submission of incomplete or incorrect forms
- breaches of the limits for small society lotteries.

51.2 Once the application for registration has been accepted and entered on the local register, the Council will then notify both the applicant and the Commission of this registration as soon as practicable.

Should you have any comments as regards this document please send them via e-mail or letter to:

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Gambling Harms Strategy: Feedback from those with Lived Experience

June 2024



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Background

Gambling harm has been identified as a key area that Hertfordshire County Council seeks to address from a public health perspective. The harms of gambling are becoming increasingly well-researched and recent national attention has been given to tackling this with the release of evidence and proposals to update the Gambling Harms Act (2005).

Gambling harm is defined as “gambling to a degree that compromises, disrupts and damages family, personal or recreational pursuits. People with experience of gambling harms are “gamblers who gamble with negative consequences and a possible loss of control”.

Gambling-related harms are defined as “the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society².” These harms impact people’s livelihoods, relationships with family and friends, and mental and physical health. Gambling-related harms go beyond just impacting the gamblers themselves; it can affect their children, partners, wider families, social networks, employers and society as a whole. Those affected by gambling but do not engage in gambling are referred to as “affected others”.

In January 2022, Gambling Harms was the focus of the Impact of Scrutiny Advisory Committee (ISAC), and several recommendations were made to tackle gambling harms for Hertfordshire residents. A Joint Strategic Needs Assessment (JSNA) Briefing: Gambling-related harms was undertaken in response and published in February 2022³.

JSNA Briefing: Gambling-related harms (Key Findings)

The JSNA Briefing found that people with a lived experience of gambling harms face the following negative consequences and a possible loss of control as a result of their gambling:

- **Financial harms:** debt, bankruptcy, homelessness and child poverty
- **Relationships:** loss of trust, loneliness, separation, abuse
- **Mental and physical health:** depression, sleep problems
- **Employment and education:** unemployment, poor education
- **Criminal activity:** theft from family members and others

The causes and risk factors in children and young people are:

- Impulsivity
- Substance use
- Being male
- Having depression

For adults, research shows that gambling harms are more prevalent in:

- **Males**, particularly those aged 25–34 years

¹ [Problem gambling vs gambling-related harms \(gamblingcommission.gov.uk\)](https://gamblingcommission.gov.uk/problem-gambling-vs-gambling-related-harms)

² [Problem gambling vs gambling-related harms \(gamblingcommission.gov.uk\)](https://gamblingcommission.gov.uk/problem-gambling-vs-gambling-related-harms)

³ [gambling-related-harms-jsna-briefing-2022.pdf \(hertshealththevidence.org\)](https://hertshealththevidence.org/gambling-related-harms-jsna-briefing-2022.pdf)

- People who are **unemployed** or in the **most deprived** IMD quintile
- People with **low life satisfaction and wellbeing**
- People who consume more **alcohol**
- People from **Asian and Asian British ethnic groups**

Other groups who may be at risk of gambling include:

- People experiencing **homelessness**
- **Military veterans**

Gambling Harms Draft Strategy and Action Plan

The vision is to protect residents from the harms of gambling from prevention to treatment. A number of recommendations have been made by ISAC and in the JSNA briefing. These have been used to inform the proposed priorities of the draft Gambling Harm Strategy for Hertfordshire (subject to consultation).

Hertfordshire County Council's Public Health team and the Hertfordshire Gambling Harms Alliance felt it was imperative for experts by experience to be involved in the early stages of drafting the Gambling Harms Strategy to ensure their lived experience informs the strategic priorities and actions required to reduce gambling harms in Hertfordshire.

Aims

This engagement aimed to hear from experts by experience and to discuss with them the proposed draft strategic priorities and what should be included in the strategy action plan to address them. The draft priorities are as follows:

Priority 1: Increased awareness and identification for public and professionals

- Awareness campaign: Reducing stigma, increasing awareness of gambling as a public health issue
- Increased training for professionals: To identify, screen and direct

Priority 2: Protecting vulnerable groups from gambling harms

- School programmes: National programmes in schools and local partnership
- Community engagement with those from different communities e.g. ethnically diverse groups, faith communities

Priority 3: Increased data and evaluation

- Data sharing agreement: Between service providers for local numbers of people seeking help, being referred
- Evaluation and review: Monitor key indicators and trends to measure success of work on gambling

Priority 4: Influencing the licensing and regulatory environment

- Ensure enforcement of responsible practices including age restrictions
- Limit licensing of new gambling premises in Hertfordshire: proposing cumulative impact assessment, asking for set of principles aimed to protect vulnerable groups
- Lobby the government and changing attitudes towards gambling: restrictions on advertising, licensing etc.

Priority 5: Effective treatment and support

- Ensure comprehensive support services are present: voluntary sector and NHS

- Financial support for those suffering from gambling harms: working with partners such as Citizens' Advice

Methodology

A collaborative approach was undertaken with Hertfordshire County Council, Public Health team, Healthwatch Hertfordshire and Viewpoint. They worked in partnership to hear from Hertfordshire residents aged 18 years and over who had a lived experience of the harms caused by gambling.

To recruit participants to take part in focus groups, Viewpoint and Hertfordshire County Council worked together to promote the opportunity to Hertfordshire residents. A poster advertising the focus groups was distributed to organisations most likely to be supporting residents experiencing addiction. This included organisations such as Drug Link, Change Grow Live (CGL), The Living Room, Citizens Advice, Breakeven and Carers in Hertfordshire. The organisations were asked to display the posters and share it across their networks. They were also asked to include an article in their newsletters to service users (if they had them) and promote across their social media channels.

They were also asked to identify service users who met the eligibility criteria and, with their permission, pass on their contact details to Viewpoint to be invited to join one of the focus groups. The eligibility criteria for participating in the focus groups was to be aged 18 years and over, living in Hertfordshire and to either be currently or previously affected by their own or somebody else's gambling.

It was decided to hold a mixture of online and face-to-face focus groups to give participants a choice. Initially four in-person and two online sessions were arranged. Besides initial responses and expression of interest that were promising, it was apparent that demand for attending online far outweighed that for attending in-person. An additional two online sessions replaced the respective face-to-face sessions. It was difficult to fill all the spaces available which is likely due to the secretive nature of gambling.

The focus groups were held in May and June 2024. 18 residents took part across five focus groups (three online and two in-person). Given the sensitivity of the topic and the importance of retaining anonymity, demographics were not collected from participants. Focus groups were conducted and facilitated by Viewpoint. This engagement was then transcribed and thematically analysed by Healthwatch Hertfordshire to identify key themes.

Once all sessions were completed, discussions were held between Hertfordshire County Council and Viewpoint to arrange the provision of one-to-one telephone interviews with individuals who were less comfortable speaking in a group setting. This opportunity was promoted to Breakeven, Carers in Hertfordshire and The Living Room, however there was no expression of interest by residents.

Key Findings

Priority 1: Increased awareness and identification for public and professionals

Lived Experience of Gambling

Participants shared their experiences of gambling harms and the impact it has had on themselves, as well as their relationships, livelihood and finances.

Most participants had initially started gambling during their childhood, recounting trips to the seaside, the races, playing card games and using fruit machines – although the majority did not see this as problematic.

"I wasn't aware at all because even from a young age, I used to love playing fruit machines and I loved playing card games, and I loved going to the races. So, I always loved it, but it was never anything more than just a day out or a game of cards."

"When I was little, I used to live on the seafront, and we'd go to the arcade with the pennies, and they'd give you more pennies. And how addictive is that? I never went home with any pennies. I'd never come home with any money because of the thrill of getting all those pennies and being able to put back in."

Many described their gambling as a "coping strategy" and a "vicious cycle" of losing money and continuing to gamble with the hope of winning more money back. Most were oblivious to their addiction until it was too late and substantial damage had been caused.

"I effectively knew the damage that could be caused but I didn't see the damage it was causing."

"You start literally doing it because you are chasing a loss, and you literally blank out for that hour. You just want to get back the money you lost or the thought you have to tell someone 'Oh no you can't have a pair of school shoes because we have no money' so you just try everything to win it back."

"The biggest thing is that you lose money and because you've lost so much you think 'I have to now win because I've lost so much' and then you go into debt and it's like a vicious cycle that you can never get out of."

Participants shared that their gambling addiction had a significant impact on their mental health, with a few participants even experiencing suicidal thoughts. Many participants also found themselves in financial strain which often exacerbated their poor mental health.

"The harm of gambling cannot be overestimated because it's emotional damage, especially when cash has been taken, to be won the cash has to go, it's the expectation of the possible win. When it first comes, you get an emotional high, then emotional damage which comes subsequently."

"I remember having a really tearful conversation with the doctor over the phone, it was like a release in a way, but it was horrible, even now I think about it, oh my god that point in my life was just horrendous. I didn't know where I was coming or going, I wanted to die at that point. I thought my husband would be better off, I bought life insurance and I honestly thought if I took myself out of the equation they would be absolutely fine. I couldn't do it because my child has autism, it kept playing in my head like, he needs routine, I need to be here."

"My dad took his own life because of his gambling addiction. I'm very aware that it is a very bad addiction and can kill people."

Public Awareness of Gambling Harms

Participants felt that the public was not aware of the negative impacts gambling can have. Participants said gambling is often considered "harmless fun" and an embedded part of our culture – they gave examples such as going to the races, betting on sports, playing on fruit machines, and buying lottery tickets.

"I think the majority of people see it as something fun, whether that's going to the races for a day or a sweep stake on the grand national. I mean loads of people buy a lottery ticket every week, people don't understand unless they've experienced it."

"It's seen as a like a fun activity though, isn't it? And it's not recognised as being as dangerous as it actually is."

Participants suggested that unless someone has been personally affected by gambling, they are unlikely to be fully aware of the devastating consequences it can have.

"I don't think anyone has any idea about the impact until you can't pay the bills. We are going to have to sell the house; I think the impact is underreported."

"Unless you're actually affected by it, I don't think you're really aware of the risks."

Participants also felt that gambling is often not considered as dangerous as other forms of addiction, such as drug or alcohol use. They reflected that this could be because the act of gambling is much easier to conceal, which again means that public awareness of the risks of gambling is far lower when compared with other, more visible, addictions.

"A lot of it is done behind closed doors now because of social media. You can go on your phone, and you can bet for as long as you want and no one around you will ever know about it, it can just go undetected, whereas with alcohol it doesn't."

"People are way more aware of how damaging drugs and alcohol are, but gambling isn't seen in the same light."

Carers of those with a lived experience of gambling suggested a "spot the signs" list should be produced to help people potentially detect the signs of gambling.

"I think creating a 'spot the signs' – it was only when he started avoiding taking part in family stuff that alarm bells started ringing."

Reducing Stigma

Linked to public awareness, many participants discussed the stigma and discrimination those with a lived experience of gambling harms may face.

"There's a great reluctance to disclose with family members because of the stigma and shame around it."

"When someone answers the phone, you've got to speak, and you're embarrassed, and you're upset, and you could go to prison or whatever. People say to you 'why didn't you tell somebody?' because it's shame, it's not easy to go and tell anyone."

One participant shared that they are reluctant to disclose their experience of gambling-related harms to their employer for fear of being stigmatised or losing their job.

"The stigma around gambling is just so, so massive. My work doesn't know, I've been there for over two years, they don't know anything about it because it hasn't affected me at work. There's a massive stigma and so much guilt. I don't want to go into my work and tell them in case it affects that, so there's a massive stigma there. If they weren't happy that I was a gambler I would lose my job and that's a route I don't want to go down."

Given the lack of public awareness, participants strongly agreed that a priority should be to reduce the stigma associated with gambling, and to increase awareness of gambling and the severe impact it can have on an individual's livelihood, relationships, finances, and mental health. Many agreed that launching an awareness campaign would help to achieve these aims.

"The public does not have adequate knowledge; they are not fully aware of the effects of consistent gambling. So, it needs to become a priority to educate people on the negative effects of gambling too."

"Proper education on the risks involved in gambling is lacking. People tend to promote the little possibility of making one rich than the damage it causes."

"I definitely think there needs to be an awareness campaign. "

Awareness and Identification amongst Professionals

Participants argued that professionals often do not have an adequate understanding of gambling harms and agreed a priority should be to improve and increase awareness amongst professionals.

"I think awareness needs to increase especially with professional people because I don't think they understand."

"Health professionals should view gambling in the same way as they might for alcohol and substance misuse. It doesn't feel like professionals have the same level of understanding or sympathy around gambling."

Participants also agreed that professionals should play a role in helping to identify those at high risk of and/or experiencing gambling harms. However, due to the secretive nature of gambling, participants argued that in practice, it could be difficult to detect and identify people at risk.

"Before it was never recognised as an actual addiction because it's not a tangible thing. You can't detect when somebody's come home, and they've gambled £100,000 or their savings or the money for a deposit for a house. You can't tell if someone's just gambled, it's silent, isn't it?"

"How would you identify someone as a public health professional, how would you identify that? People aren't going to think of going to the doctor. I don't suppose it would enter your head that it's something a GP could help with."

To remedy this, participants strongly agree that a priority should be to educate and train professionals on how to effectively identify and detect people at high risk of and/or experiencing gambling harms and felt this could prevent people from reaching crisis point. Some participants also suggested that professionals could adopt a screening tool or ask questions about their mental health and wellbeing during medical check-ups to potentially identify people.

"I would also train those people who can easily identify those who are stressed due to gambling. Let's train more people who can easily identify people who are gambling so we can reduce the effect of gambling to society."

"I definitely think there needs to be more and increased training for professionals."

"Some people have been screened and they've found out that they have behaviours that could suggest they are at risk of gambling addiction, that's quite big, isn't it? You might not necessarily want to be directed straight to a gambling charity, but you could be signposted elsewhere."

"During medical check-ups, they should be able to ask questions like 'do you gamble' so they can know how to advise them appropriately. I've seen questions like how often do you have sex, so if those questions could be asked to identify sexual activity, why not gambling?"

Priority 2: Protecting vulnerable groups from gambling harms

When asked about which groups could be vulnerable to gambling harms, most participants felt there is not a specific group that is more at risk and argued that anyone could be susceptible to gambling harms.

"I think it could be anyone – I don't think there's a vulnerable group as such. I wasn't in a vulnerable group; I think the whole of society is vulnerable. We're all vulnerable – I don't think you can pinpoint people."

"Anyone is susceptible – it could be anyone which I think is important. It's really hard to target specific groups. Anyone could be vulnerable to something like that."

However, some participants did identify some groups that they felt could be at increased risk of gambling harms. These groups are listed below.

Children and Young People

All participants felt that children and young people are susceptible to gambling harms and are the most at risk compared to other demographic groups. They commented that gambling is now far more accessible to children and young people with the increase in online gambling and betting on sporting events, which is often glamourised to the younger generation – meaning they do not see the devastating reality of gambling harms.

Participants also suggested that younger generations may be more predisposed to gambling addictions compared to the older generation due to growing up with addictive games and social media platforms in which gambling advertisements and applications are increasingly prominent. Participants commented that even children's games ask users to spend money to level up or earn more rewards, which they also saw as normalising gambling.

"I think children and young people are vulnerable in the sports side of gambling – the sports side of it on the internet is huge."

"Places like Vegas on TV shows glamourise gambling so until you've experienced it, it doesn't give you the same level of distress and children and young people won't be aware."

"All those games they're playing – it's so addictive. We all know how addictive those things are, children don't see how it can become a problem. Those apps on your phone – they're all addictive – you play it and you've lost your lives and it'll come up that you can buy an add-on. It reels you in, my grandchildren do that – that's gambling, that's buying things so that you can play. It's no different."

Some participants commented that more vulnerable children – such as care leavers and those with neurodivergence and/or learning disabilities – may be more susceptible to the risks and harms of gambling.

"The looked after children in foster care experience a number of adverse childhood experiences and addiction may be more likely to affect them."

"In terms of protecting them, it's about information and restrictions and remembering that most people with SEN feel younger than their chronological age emotionally so need to be protected."

To safeguard children and young people, participants called for the provision of more awareness, information and education about the potential risks of gambling. They suggested using influential people such as the police to teach children about the harms of gambling and linking gambling into current educational programmes such as suicide prevention and mental health.

"Get someone like the police in to show them that side of it. Make sure it is part of the addictions package that is delivered at schools which is currently very alcohol and drugs focused."

"We definitely need to help to protect them from the dangers of gambling. We need to put it into the school curriculum so they will be exposed to the dangers of gambling which will be good protection for young adults."

"I suppose the best thing is knowledge. So, I think going around schools and showing them the harms that it can do at a certain age maybe."

Participants also emphasised that children and young people are more likely to be "affected others" – people who have to deal with the consequences of gambling. They suggested that children are particularly impacted by gambling, giving examples such as behavioural changes in their parent(s) and having less disposable income. They suggested that schools could play a role in spotting potential signs of gambling in families to help safeguard children, and for children to have access to counselling should they be affected.

"Much like all the other addictions children are very reticent to come forward because they are very protective of their parents, children won't tend to come forward unless they reach absolute crisis point or they are going to lose their home."

"I have worked in schools, and I think potentially school staff could be more vigilant to change in financial circumstances of families. It's difficult because you don't want to pry into people's private lives but if a kid can't go on the trip or the parents are struggling to replace uniform, that's another potential sign that professionals can spot."

"I think there needs to be some sort of counselling for school children as well. Bedfordshire Council had access to all different services, they were brilliant with our child, whereas Hertfordshire doesn't have anything like that."

People who are economically challenged

Some participants identified that those who are economically challenged may be more vulnerable to gambling harms and may be inclined to act recklessly in order to increase their financial position. They also noted that more deprived areas tend to have a greater number of gambling establishments.

“Also – which is sad isn’t it – deprived areas. Apparently, someone said that in Watford there’s 14 betting shops and in St. Albans there’s just 4.”

“Nobody is comfortable being a low-income earner, they find one or two ways to increase financial status, so maybe they have worse judgement and use gambling to make money. It tends to happen to those people in that society, that’s how they will venture into gambling and start losing money because they’re unemployed.”

Gender

A few respondents identified that men, particularly young men, are more likely to be at risk of experiencing gambling harms.

“I think it’s still a big, big thing for younger boys and men as well because it’s still a massive problem. I look in and it’s just men on their own. There are no groups in there, it’s not a social thing, they’re literally just sitting there on their own betting. And I just find it so sad.”

Interestingly, several participants felt there has been an increase in the number of women who are gambling. In particular, they commented that women who are retired and/or whose children have left home may look to gambling as a coping mechanism.

“I spoke to Bet Know More and they said apparently after COVID and even now sadly, women at home – children have gone off to school and they’ve got quite a lot of time to themselves – apparently there’s been a big increase in women doing online gambling.”

“Suppose ladies of that age – children have moved out, they’ve moved on, there’s a big gap in your life that you’re trying to fill in.”

Ethnically Diverse Groups

When participants were asked whether they felt ethnically diverse groups are more vulnerable to gambling harms, some recognised they could be. However, most did not feel qualified to speak about the experiences of ethnically diverse groups and recommended targeted engagement to hear from those communities.

“After doing a bit of reading they say BAME communities – Chinese, Asian groups, particularly males in those communities are at risk. I didn’t know that, until I read this piece of research, I wouldn’t have known that without reading.”

“We need people from those cultures to be able to answer some of those questions.”

Carers

Interestingly, a few participants identified that carers could be a vulnerable group, as they are more likely to feel isolated, spend time at home, and be under emotional strain.

"I think carers need to be considered. If you're in a caring role and you're sat at home and maybe caring for a relative and you're feeling a bit isolated, things aren't going that well, could you be getting out of whatever is going on by having a bet?"

"They create a social aspect to some of the apps, don't they? So that might help a carer and they're sort of feeling isolated – they're doing the gambling but also making friends online at the same time."

Priority 3: Increased data and evaluation

Collecting Data

Participants agreed it would be valuable to increase data and evaluation measures, so there is more local and national data about gambling, those affected by gambling, and the scale of the problem. Participants suggested having this data would also enable decision-makers to assess where and how support needs to be targeted. However, they questioned how collecting this data would be implemented in practice.

"I think that's really important, getting the data of the number of people that are seeking help is big – I think that's where you need to start because otherwise, you're dealing with something where you don't know how big the monster is."

"I think increasing the data so that you know the effect on the population so that you can be able to take appropriate action. We have a certain number; we need to do something. So, I think data collection would help us know what to do."

Some participants suggested that data could be collected from support services and voluntary sector organisations, however they acknowledged that this would not identify the people experiencing gambling harms but who are not accessing support. They also recognised that sharing data could be challenging due to data protection regulations.

"From places that deal with those addictions, obviously they can give you data, but that's a minority of people – it's just a handful in a whole beachful of stones, isn't it?"

"The charity sector seems to have it covered. I don't know how you would do it and whether they would be willing to release their data, a lot of these programs, anonymity is important isn't it?"

A few participants said that Freedom of Information requests could be undertaken from gambling websites to find out how many local people have signed up and to collect quantitative data.

"They would have to do a Freedom of Information or something where they could give you postcodes so at least you have figures that way."

Many also suggested that surveys and questionnaires could be sent out to ask the public about their gambling habits. Although, participants recognised this could be challenging, given that some people experiencing gambling harms are hard to reach and/or not wanting to share personal information. They also highlighted that some people may not yet recognise that they have an addiction.

"We can collect questionnaires. We can also do sampling to see the affected group, the affected people. Ask them questions like how long have they been gambling, why are they gambling. We would see the reasons behind the gambling."

"People just throw them in the bin 'I'm not telling you about my private life' so how do you get that information from people? I mean who'd be ticking a box saying, 'I'm a drug addict' or 'I'm a gambler' and do they recognise it even?"

Data Sharing Agreements

Participants agreed that creating a data sharing agreement between service providers for local numbers of people seeking help and/or being referred is an important priority to be adopted and would help to reduce the impact of gambling harms. To evaluate the effectiveness of treatments, participants also suggested using data sharing agreements to also measure how many people have relapsed after being referred for treatment.

"Sharing with other providers would help us know how to conquer this effect of gambling and discuss how we can reduce its impact."

"On top of that, the data for the number of people that are seeking help and being referred, how many people stay clean? That would be interesting as well because then you could see if they actually work."

Priority 4: Influencing the licensing and regulatory environment

Influencing the licensing and regulatory environment was the most important priority for participants, and they felt it should be the first listed priority in the Gambling Harms Strategy. They argued that there is a lot more the government can do in terms of lobbying, changing attitudes, and increasing restrictions, and that the monitoring of gambling should be far more regulated.

"I think it's an important priority for everyone, government, everyone. There's so much more they can do, they've got to lobby the government, change attitudes, restrictions on advertising – all of that."

"I completely agree that this is the most important thing that needs to be done."

However, participants felt it could be hard for effective lobbying to be undertaken, given the profits the gambling industry makes.

"It's a highly lucrative industry. I've googled the profits made by the bigger companies, and we're talking billions, so I would imagine they have quite a strong lobbying faction. I think the government are up against it in terms of legislation and regulation."

"I think there's no incentive, no reason for the people involved to limit it, because it's about making money."

Accessibility of Gambling

Participants commented that gambling has become far more accessible in recent years, with the public having greater access to a range of ways to gamble, as well as gambling establishments.

"But now it's so easy to gamble and there's so many different types, it's like football we used to just bet on the score and now you can bet on everything."

"Well, the public are at high risk of gambling because these companies are everywhere, so we need to look upon how we can reduce those."

Participants gave examples such as "spin to win" prizes on supermarket apps, TV shows, raffles, scratch cards, and the ubiquity of fruit machines in places such as pubs and service stations to highlight how gambling is "everywhere" and "inescapable".

"Even when you go to Sainsburys and you go on the app and it says spin for more prizes for more points, it's literally everywhere and thrown in your face."

"It's hard enough when you go to get newspapers because you have got scratch cards in your face. It's quite hard at times because you have that in your face, the temptation is always there."

"The dodgy thing for me is at service stations, you stop at a service station to get coffee and there's slot machines, what, why? It's inescapable."

Advertisements

A key area participants called for more restrictions on was advertising, with many stressing the pervasiveness of gambling advertisements, from social media, television, the radio, and public spaces. Participants felt this level and intensity of advertising was highly inappropriate and often very triggering for those at risk of or experiencing gambling harms.

"On Facebook, I get fruit machine things coming up for gambling, on my emails, when I came out of prison, I was getting loads of advertisements from the websites. You're just bombarded with it. Turn on the TV to watch I'm a Celebrity, and it's a Tombola advert – they're just everywhere. Sometimes on sports when you watch it, it's every advert, and it's going to trigger you. I think it's just bad."

"You can't even listen to the radio, without there being a competition or watching The Chase, Gala Bingo, you watch football and it's every single advert, literally it is thrust in your face all the time."

Participants commented that advertisements are often colourful, vibrant, fun and enticing and do not showcase the negative impacts of gambling, which again contributes to a lack of public awareness about the risks and harms associated with gambling. Advertisements also tend to portray gambling in a positive light, only showing people who are winning.

"I think something around the advertising particularly of online gambling – they make it look easy and far too easy for me. I'd think 'I'll have a go at that' and I can see how people get addicted."

"The public's not really aware of the effects because of advertisement. They only advertise the winning power of gambling, they only advertise if someone has won a bet, how they move from financial strength to strength, they do not say that you can lose, that you can lose your house, you lose your money, they only advertise the positive aspect of it."

Participants also agreed that the "safer gambling" messaging in advertisements is not an effective deterrent and has not encouraged them to stop and reflect before gambling. Participants felt that the slogans appear to be a tick-box exercise and a legal requirement for gambling companies.

"People who are addicts are never going to listen to any of that safer gambling crap. It's just rubbish. That is just because they legally have to do it, it doesn't mean anything."

"It's on all the websites, 'when the fun stops it stops' etc but if you look at the marketing on most gambling things, it's always in tiny writing at the bottom. When you're in active addiction you're not having fun, you're seeking the win, getting the dopamine hit you need, you're not going to take any notice of that tiny little writing at the bottom."

All participants called for far more restrictions on advertising with suggestions including reducing the number of advertisements on daytime television and lobbying the government for greater restrictions and legislation.

"Definitely restrictions on advertising – I think we should lobby the government on that. I mean they don't advertise cigarettes now on television, they're not allowed."

"I've been on social media, and it's popped up and I've been on any gambling companies on my phone, but a random ad will pop up for gambling. No one should be seeing that."

Increased Restrictions – Online and Establishments

Online Restrictions

Participants called for the need for more restrictions on online gambling. Suggestions included restrictions on gambling websites promoting incentives such as "free bets" or "free spins" which often act as gateways to spending significantly more money.

"There is a lot of fine print and I think they should stop offering free spins and things to get you on there. They offer you free spins and you think 'Oh I'll have a go at that' so when your free spins are up you think 'Oh I'll have £20 on that' and that's you hooked."

Respondents also raised that with online gambling there are very few regulations, making it easier for people to lose large amounts of money within a small amount of time. One participant shared that one could bet as much as £500 on a single online spin, and there would be no warning message to ask the person if they want to bet that much money. This participant suggested legislation needs to be introduced to prevent this.

"I think the other thing that's key if they're going to bring in any legislation is that amount you can play for online. Online for one spin, you can go up to £500 and that is nuts. I've done it by accident I thought I was playing with £5, and it was £500, and it doesn't give you any warnings. You press a button, spin, press a button, spin, think how much that could cost in an hour. When you're playing there it doesn't seem like real money, with online gambling you're not playing with physical cash, so it can be lost easier."

In terms of online gambling, a few participants also suggested that there needs to be more restrictions on the number of accounts that can be opened on online websites. One participant had opened 25 online accounts to get around the £10 deposit limits they had set.

"There should be a way that protects you, it should say hang on a minute you've just opened 6 accounts in an hour. There's no protection in that you can open up as many accounts as you want with all of these websites. I think there needs to be more enforcement around using the technology available to prevent people from opening multiple accounts to access gambling once they have run out of money."

Establishments

As well as online websites, respondents suggested that there needs to be more restrictions in gambling establishments such as casinos and bingo halls, commenting that gambling has become more accessible in these venues, especially with people now able to spend money automatically.

"You don't even have to play. You just set it and tells you whenever you want a number, you don't even have to watch it. It's really getting bad because they're just looking at the best way they can make their money. Before when you had to circle all your numbers you had to concentrate, and you don't have to do that now."

"I used to do it in the casino, I'd put my money so I might put in a few hundred pounds and then I'd set it on automatic and I'd go and have dinner in a restaurant. I mean how stupid is that? You're not even sitting there doing it! It's just crazy it's absolutely nuts."

Participants also called for tighter regulations on who enters betting shops and called for staff to be more vigilant about who is using the machines and placing bets. Some suggested that establishments should not have mirrored windows and should reduce their opening hours.

"They've got those other slot machine places along the high streets, haven't they? And no one regulates those type of things, what do they ask when you go into those places? They don't ask you anything, you just go in and play."

"You can't see in, if you could, how many people would go in and stay there all day?"

"It'd be good ideally for the gambling shops to reduce their hours. It'd be nice for them to be told 'no you can't be open 8 until 8' or however late they're open. Cut the hours down by half and eventually they will die out, hopefully."

Increased Restrictions – Self-Exclusion

Self-exclusion is a tool that people experiencing gambling harms or at high risk can use if they want to stop gambling because they are at risk to themselves or others⁴. Individuals can ask a business to exclude them from gambling for a set length of time – this is usually between six months and 5 years⁵. Once someone decides to self-exclude, it means they will be refused from any of these establishments or online websites. Gambling businesses are required by law to offer customers the option to self-exclude⁶.

Many participants have signed up to websites such as GamCare or GamBan, where, once you are registered, they prevent you from accessing multiple gambling websites. However, participants shared that these websites can be easily turned off and on and that there is no single provider where you can block all websites. This means people can easily access websites that the self-exclusion software does not cover. Participants called for a single database from which all gambling websites can be blocked.

"In two weeks, time you think 'Oh I want to go back and have a play' you can just go to another site! I think that all those sites should have a database where people who've blocked themselves for a period of time on one, it applies to them all. It should be across the board because obviously, they've got a problem."

Participants also shared concerns about gambling establishments and websites contacting people to lure them back into gambling with incentives such as "free bets". They raised that gambling companies

⁴ Self-exclusion ([gamblingcommission.gov.uk](https://www.gamblingcommission.gov.uk))

⁵ Self-exclusion – GamCare

⁶ Self-exclusion ([gamblingcommission.gov.uk](https://www.gamblingcommission.gov.uk))

should not be able to contact people at high risk of gambling harms, especially if they have previously self-excluded.

"And that's something I do think should be changed. If someone is saying 'I don't want to come back here I'm banning myself' and then they text you 3 months later? No. That's something that we should be lobbying for."

"Somebody might just one day gamble lots of money and the next day think 'I can't do that anymore; I'm really going to work on myself and try and get better' and then suddenly you get a text that says, 'You've got a free bet', who at the early stages is going to say no to that? It's literally like dangling meat over a dog."

One participant shared that despite not gambling for months, they received around 25 texts from different gambling establishments in the last month, sometimes offering them free slots.

"There should be some way as soon as you put somewhere that you are a compulsive gambler that you shouldn't be able to get any text messages because I've had probably about 25 in the last month offering slots and stuff, I just delete them but it's terrible. It doesn't stop. I had a casino call me the other day, cold call me."

For individuals to exclude themselves from arcades or adult gambling centres, they must visit the establishment in-person. Participants felt this process was "disgusting", with one participant sharing that they and their partner had to physically walk into each gambling establishment individually as it was not possible to exclude their partner from multiple sites at once.

"The process to self-exclude is bonkers and it's the equivalent to asking a drug addict to walk into the house of their drug dealer and say to them 'I don't want to take drugs anymore'. That is what the equivalent of what trying to exclude gambling is. It's absolutely disgusting what gambling addicts have to do to self-exclude. People that want to stop gambling have to physically walk into a gambling establishment to self-exclude and there isn't just one organisation. Then it only lasts 6 months to a year."

As such, all participants called for gambling establishments and websites to make it easier to self-exclude once they have decided to stop gambling. They said this process needs to be instant and for there to be a single place or database to allow people to exclude themselves from every website or establishment.

"Self-exclusion needs to be easier, it needs to be easier as well, once you've told them your name to be barred essentially."

"There needs to be somewhere as you say, where you can be like 'I don't want to gamble anymore' and you physically cannot."

Age Restrictions

Participants felt that it is possible for people under the age of 18 to gamble, particularly online as they could lie about their age, and stressed that age restrictions for gambling must be more widely enforced and regulated.

"In terms of regulation and law, going back to children, there needs to be an identification process. I know there are age limits, but they couldn't care less who walks in there and gambles, that needs to be more greatly enforced."

"Between the ages of 11 and 16, there's a massive number of young people that are gambling somehow. You could probably access a website, or an app and you could lie about your age. I'm sure it's not that hard."

Most participants suggested increasing the age restriction for gambling and/or implementing a similar initiative to the proposed phasing out of cigarettes. Some participants felt that at the age of 18, young people may be more likely to be irresponsible with their money.

"They say the brain doesn't actually fully develop until the age of 25 or 26 so I know they're considered adults, but they are still young adults. So that might be something, that with the regulations, we actually move it from 18 to 25."

"Licencing in terms of age and increasing the age of people who can go into gambling shops. It's like the smoking thing, in however many years time, younger people aren't going to be able to buy cigarettes so eventually it will die out. So, if you increase the age to 25 in another 5 years it could be 30 or 40."

Priority 5: Effective treatment and support

Barriers to Accessing Support

Lack of Awareness

A key barrier preventing participants from accessing support for their gambling harms was a lack of awareness. Many shared that they did not know who to contact or where to go for support and were not aware of what types of support existed.

"There is limited support for people and most of them don't even know where to seek for services around the county."

"Most people having a mental health crisis would ring the Samaritans, you know this happens, you do this, this happens, you do that. I just don't think it's the same for gambling."

"It was horrible, and you don't know who to contact at that point."

For participants who had accessed support, the majority found support groups and services via online searches. Most participants were not aware of local support available to them and said that most online searches only displayed what national support is available. As such, participants suggested that there needs to be greater awareness and signposting to local and national support, and advertising of these services in public spaces.

"I googled gambling addiction, and it came up with Gamblers Anonymous, so I joined the online one."

"I don't think there's enough publicity to what's available because when you go online, and you put in help for gamblers it's national organisations, but I don't recall seeing anything for Hertfordshire."

"What about advertising in bus stops? I think there should be more, because lots of people don't want to get help, they don't feel they need help, or they're embarrassed, or they don't feel like they can. If they saw a poster somewhere they could quickly take a picture of it – they don't have to tell anyone."

"It needs to be available in everyday life, they need to be able to see what help is out there."

Stigma/Fear

Some participants said they were reluctant to access support due to stigma and the fear of how other people would regard them. To alleviate the fear of stigma and shame, participants emphasised the importance of receiving anonymous support and/or online support to protect their identity.

"I was scared of how people will regard me."

"I didn't want it to be real, but if somebody found out, then it would be real."

"I think Teams and online meetings would actually be quite helpful because you could just be anonymous if you wanted to. You can put your name in as anything, you don't have to tell everyone who you are."

"I like the anonymity of it and being more national than in my area and with my work not finding out."

A few participants also felt that the provision of online support could be more accessible to specific groups, such as single parents and carers, who may not be able to attend face-to-face meetings.

"And just thinking about single parents who can't get a babysitter – it opens the door for them to be able to go online, it gives them a bit more flexibility. Carers, if they can't leave the person they are caring for. It just makes it more accessible I guess."

Participants did see the value in both online and face-to-face support, acknowledging that each individual will have their own preferences in how they want to be supported.

"I think it would be lovely to do face-to-face and online because I think they both have their value."

"Some people would prefer to go face-to-face, and some people would prefer to be online. It depends on the person."

Support from Addiction Services and the Voluntary Sector

All participants felt the provision of effective treatment and support was an important priority, with many commenting that there are not enough support services in place to support those at high risk of or experiencing gambling harms. Those who did seek support (such as from Gam-Anon, Gordon Moody, Bet Know More, New Beginnings and Gambling Anonymous) tended to have very positive experiences, praising the peer support groups, counselling and treatment programmes provided.

"I would be lost without the community I have now. I feel like I have 100 best friends because I have a community that I can speak to that understand me and how I feel."

"Getting support is a big challenge, I think it should be worked on. Everything is there but it's minimal, it's not enough so we need it to be increased."

"I had a 12-week programme of treatment and counselling which was brilliant. It's more about understanding yourself, they give you tools."

One participant had accessed The Living Room which they described as "life-changing" and praised how the structure of peer support enabled them to recover. However, this participant did also acknowledge that it can be difficult for people to access The Living Room, given that you must attend daily during working hours.

"I can't tell you how much it changed my life. It's somewhere you can go where you're safe, where you can discuss feelings in the group, and it works. It absolutely works. I think because there's people there and you're in a group and it's the same people every time, you don't want to tell them you've failed because you have become a group that's supporting each other. I think we need a lot more of those types of places, they've only got 3 places, it's not enough really, is it? And maybe a little more flexible because The Living Room you have to go to everyday. If you're working, it's really difficult – how do you go everyday when you're working? So maybe introducing a type of Living Room but in the evenings."

In addition, participants commented that the voluntary sector can provide excellent forms of support, and it is important that people at high risk of or experiencing gambling harms are signposted to these services. Some participants also agreed that it would be useful for voluntary organisations, such as Citizen's Advice, to offer financial advice to those in need.

"Somewhere like Viewpoint would be a great place to signpost people – some telephone support, you know, particularly for those who've had experience with gambling."

"I didn't know Citizen's Advice could help, that would be helpful. They could give financial advice, but I don't think solving the problem would be to give a gambler more money to spend."

Support from the NHS

Only two participants had contacted their GP for support with their gambling – in which one person received good support while the other felt their problems were "brushed aside". However, the majority of participants expressed that most people would not consider visiting their GP for support with their gambling.

"When I phoned up and said what had happened and I'd been arrested, and I needed to speak to someone about my mental health and that they just gave me telephone numbers. That's not support, that's brushing it aside."

"My GP knew the amount that my gambling had impacted my situation, so they made a referral and set up some counselling."

"I don't suppose it would ever enter your head that it is something your GP could help with."

Nonetheless, most participants felt that GPs should play a more proactive role in supporting people at high risk of or experiencing gambling harms. In particular, participants suggested that GPs could implement preventative measures and early intervention, such as signposting people to support groups and services.

"Early help and early intervention – that's where it's going to be key. Let's really focus on that early help, such as support groups or peer support groups."

"Prevention is important and think the health service could support with that."

Participants also raised that GPs should provide greater support in terms of mental health, given the impact gambling can have on an individual's emotional wellbeing. They also felt that waiting lists for mental health services were too long and could prevent people from getting the help they need.

"You get 10 minutes in the doctors to talk and if you sit there crying your eyes out because you can't cope, they just give you anti-depressants, they might stop you from crying, but they don't actually fix that you want to talk to someone."

"And that's when you go through to mental health services and then they say in 6 months they can give you an appointment, that's no good is it?"

"Talking to someone – that's what I've found in my life that I didn't do. That's why counselling is such a big, big thing. Counselling in early stages would help massively, absolutely massively."

Support for Affected Others

Participants also called for more support to be offered to those affected by other's gambling. Many said they were not aware of the support available and/or did not consider themselves to be an affected other, both of which prevented them from getting the help they needed.

"Now he would say he's a carer but before he never saw it that way."

"I had no idea where to turn to get help other than talking to my friends and being like I don't know what to do."

Positively, some affected others had accessed support for their own wellbeing which they found to be beneficial. Nonetheless, participants emphasised the need to ensure support for affected others is accounted for within the Gambling Harms Strategy.

"I myself went to Al-Anon which is a support group for relatives with alcohol addiction."

"You want to be with people that understand it rather than people that don't understand it."

"There needs to be an element around supporting affected others as well within this strategy."

Conclusion

This report affirms that the draft priorities for the Gambling Harms Strategy are appropriate and reflect what is important to those with a lived experience of gambling harms. Although the sample size was small, the findings remain definitively valid.

Participants commented that gambling is deeply embedded into our culture as simply “harmless fun” and called for increased awareness of gambling harms, emphasising that the public must be made aware of the negative consequences associated with gambling. Identifying people at high risk of and/or experiencing gambling harms was also identified as an important priority with participants agreeing professionals could play a more proactive role in screening and identifying people.

Although most participants felt anyone could be susceptible to gambling harms, they identified groups who could be at greater risk – especially children and young people – and called for there to be greater awareness, information, and education for this cohort.

Participants agreed with prioritising the collection of data and implementation of evaluation measures and data sharing agreements so that locally and nationally we can have a better picture of the extent of gambling harms. However, they recognised that this could be challenging to implement in practice.

Influencing the licensing and regulatory environment was the most important priority to respondents and they said it should be listed as the first priority within the strategy. They called for far greater restrictions in advertising, gambling establishments, and online gambling. They also emphasised the need for self-exclusion to be made easier to protect people from gambling harms.

The provision of effective treatment and support was also important to participants, who emphasised that awareness of local services needs to be improved and supported the proposal for the NHS and voluntary sector to play a greater role in supporting those at risk of or experiencing gambling harms.

It is important now that the Public Health team at Hertfordshire County Council addresses these findings and ensures the Gambling Harms Strategy reflects the needs and priorities of those with lived experience. It is also clear that some of the issues raised call for national decisionmakers to consider the findings that relate to national policy and legislation.

Although efforts were made to engage with a range of people from different backgrounds, we recognise that this may not have been achieved and would recommend further targeted engagement to be conducted.

JSNA Briefing: Gambling-related harms

February 2022

Purpose

- This JSNA Briefing explores the population-level approach to gambling-related harms, effective interventions, and the estimated prevalence of gambling-related harms in Hertfordshire.

What's the issue?

What is gambling?

- In the Gambling Act (2005), gambling is defined as gaming (playing a game of chance for a prize), betting or participating in a lottery.¹

What is problem gambling?

- Gambling, particularly problematic gambling, is gambling that can lead to negative consequences.² Problematic/problem gambling can be categorised using screening tools.³ Criteria from the Diagnostic and Statistical Manual of the American Psychiatric Association (DSM-IV) have been adapted to develop a screening tool to help identify problem and pathological gambling in the general population.^{3,4}
- The Problem Gambling Severity Index (PGSI) is another screening tool that consists of nine questions and is commonly used to categorise gamblers into four categories³:
 - **Non-problem gamblers:** gamblers who gamble with no negative consequences
 - **Low risk gamblers:** gamblers who experience a low level of problems with few or no negative consequences
 - **Moderate risk gamblers:** gamblers who experience a moderate level of problems leading to some negative consequences
 - **Problem gamblers:** gambling with negative consequences and a possible loss of control

What is the national picture?

The United Kingdom has one of the most accessible gambling markets worldwide. Gambling premises have a presence on most high streets and, with the spread of the internet, in virtually every home.⁵ The economic burden of harmful gambling is estimated by Public Health England (PHE) to cost approximately £1.27 billion.²

Gambling patterns in adults

- According to the Health Survey for England (2018), approximately 54% of adults aged 16 years and over in England participated in gambling in the past year and participation in gambling activities was highest for⁶:
 - Lottery and related products (36.0% National lottery, 17.9% scratch cards, 14.4% other lotteries)

- Horse racing (not online) (8.1%)
- Online betting with a bookmaker (7.8%)
- Slot (electrical gaming) machines (5.7%)
- Bingo (not online) (4.5%)

Gambling patterns in children

- Whilst gambling is less prevalent in children and young people (CYP) than in adults, the Young People and Gambling Survey (2019) found that the prevalence of problem gambling was 1.7% in a sample of nearly 3,000 11-16 year olds and a further 2.7% were identified as at-risk gamblers.⁷ Furthermore, around 11% had played a gambling game in the past 7 days (13% boys and 7% girls) and gambling participation was highest for placing a private bet for money (e.g. with friends) (5%) and fruit or slot machines (4%).⁷
- There is increasing concern regarding the relationship between online gaming and gambling among children and young people.^{8,9} Certain features of video games resemble gambling and yet are not subject to the same sort of age controls as other forms of gambling. For example, the incorporation of purchasable randomised rewards – or ‘loot boxes’ – encourages gamers to use real-life currency to purchase loot boxes in the hope that they may win some form of advantage. Several studies have pointed to the similarities in the mechanisms underlying players’ engagement with loot boxes and those present in gambling.^{8,10}
- The Gambling Commission’s report on gambling in young people suggested that there has been an increase in paying for loot boxes in video gaming.⁷ In the 2019 survey, half of 11–16-year-olds had heard of in-game items e.g., weapons, power-ups and tokens), 44% of those had paid money to open loot boxes, and 6% had bet with in-game items on websites outside of the game or privately (e.g., with friends).
- A large-scale survey of 16- to -18-year-olds found a statistically significant link between loot box spending and problem gambling in older adolescents.¹¹ Adolescents who spent money on loot boxes displayed more than twice as high measurements of problem gambling than those who did not. Although this correlational data cannot infer the directionality of the relationship between loot box spending and problem gambling, it demonstrates a definitive link between online gaming and gambling among young people.

Gambling-related harms

In the UK, concerns about gambling-related harms have been increasing. Informing and supporting action on gambling-related harms has been identified as a key priority within public health.⁵ In 2021, a systematic review of harms associated with gambling was published by PHE which found that gambling caused⁶:

- **Financial harms:** Qualitative studies strongly indicated that direct financial harm is caused by gambling and impacts adult gamblers alongside people who have close relationships to them, including their children. Harms can be significant including debt, bankruptcy, homelessness, and child poverty. In descriptive studies that reported gambling risk status, financial harms increased from low-risk gamblers to problem gamblers.
- **Relationships:** Qualitative studies indicated that gambling contributed to relationship harms including arguments, fights, loss of trust, separation, feelings of isolation, loneliness, neglectful parenting and domestic or family abuse. However, when longitudinal studies and meta-analyses were considered, the link between intimate partner violence and problem gambling was unclear and may be confounded by substance misuse and mental health disorders.
- **Mental and physical health:** Qualitative studies indicated extensive mental and physical harms to adult gamblers and people they were close to such as fear, stress, depression, anxiety, and sleep problems. Cross-sectional studies indicated a significant, positive correlation between gambling severity and mental health harms in adults and younger people. However, from time-based studies,

the temporal nature of the link between gambling and mental health disorders and gambling and substance use was unclear.

- **Employment and education:** Qualitative studies indicated that employment and education harms from gambling existed in adult gamblers, their close associates and in children of gambling parents. However, more high-quality longitudinal research is needed.
- **Criminal activity:** Some qualitative studies indicated associations between gambling and crime with family members often being victims of theft. Results from cross-sectional and time-based studies were inconclusive.

Protection from harm – government level

The Gambling Act (2005) and the Gambling Commission

- Following the introduction of The Gambling Act (2005), the Gambling Commission (“The Commission”) independent regulator was created to legislate gambling, ensure gambling is conducted in a fair and safe way and to protect children and vulnerable people from gambling related harms. This includes shielding children from gambling advertisements where contact and payment details are clearly visible.¹ The law also protects CYP against employment within the gambling industry. The Act does not apply to some types of gambling such as non-commercial gaming and betting, the lottery and football pools.

Limitations of current practice

- Despite legislation and the work of the Gambling Commission, it has been noted in the intervening years that The Commission and successive governments have been slow to act in protecting consumers from gambling harms.¹² There is agreement among senior officials and healthcare professionals that additional actions need to be taken to address problem gambling. There is a push to implement the introduction of a statutory levy on the gambling industry that would raise funds to help tackle addiction and problem gambling through centralised treatment and support. The current limit for a proposed levy would be set at 1% of Gross Gambling Yield (GGY), which as of 2019 sat at around £5.3 billion.¹³
- Limitations to a 1% statutory levy have been identified by the Advisory Board for Safer Gambling¹³:
 - Work must be done to ensure the industry do not view this as their only social responsibility with respect to preventing and treating gambling harms.
 - Stagnant rates must be avoided. Recommendations for a flexi-levy based on a fluid evidence base have been made to account for factors such as regional need and the ability for local government to provide for that need.
- A [House of Commons Public Accounts Committee report](#) published in 2020 highlighted a series of limitations and measures it requires the Gambling Commission and The Department for Digital, Culture, Media & Sport (DCMS) to adopt with regards to limiting the consequences of gambling-related harms and protecting consumers¹²:
 - **Lack of understanding of gambling problems and consequences:** The evidence base must be improved to design effective solutions for addressing them.
 - **Lack of effective data to protect consumers:** Most intelligence comes from the local authorities responsible for licensing and reviewing local gambling premises. However, it has been suggested that limited intelligence is received each year. Exploring ways to improve the intelligence base and to improve identifying patterns will allow them to intervene more quickly.

- **Consumers are not afforded the same statutory rights as in other sectors:** Consumers do not have the right to challenge operators on the grounds of social responsibility. The Commission and DCMS have been tasked with closing loopholes to increase statutory rights.
 - **The Commission does not have measures in place for impact evaluation:** There is minimal evidence on the impact of gambling on children and young people (CYP), and reduction targets have not been set, despite high numbers. In response to this, the DCMS and Commission must implement outcome measures to assess how problem gambling is impacted by the current level of regulation and what needs to change.
 - **[The Gambling Act 2005](#) should be reviewed** with particular focus on online gambling and child gambling as the gambling industry has changed with advancements in technology.
- As there are gaps in the evidence base on how to effectively prevent and reduce gambling harms, PHE is in the process of conducting a [Delphi study](#) with the aim of engaging key stakeholders to build consensus on which policies and interventions are likely to be the most effective at tackling these harms.²
 - There are also limited services available for problem gambling. Treatment tends to be run by charities, and currently there are only two NHS-funded treatment centres for those who experience problem gambling in England and Wales, and these focus on individuals with complex needs. Access is variable across England with no structured pathway for referrals or interventions. Treatment services would benefit from expansion and the NHS gambling service is due to create an additional 15 clinics by 2023/24.¹⁴
 - Professor Henrietta Bowden-Jones OBE, Director at the National Centre for Behavioural Addictions has previously suggested installing an industry ombudsman as a vital tool for improving gambling regulation. She also suggested the creation of a gambling harms classification index that could list specific gambling-related products as potentially more or less harmful to CYP.¹⁵ Ultimately, making products safer, limiting access, and restricting promotion and advertising are effective ways of implementing tighter regulation.¹⁶

Causes & risk factors

The below factors have been identified as having an association with harmful or problem gambling, however, this does not mean they are causative of problem gambling.

Children & Young People

- PHE's umbrella review of the risk factors for gambling and harmful gambling draws upon 39 systematic reviews published between 2008-2020, covering different populations, settings, and countries.¹⁷
- A recent high-quality systemic review based on longitudinal studies made it possible for PHE to identify risk factors with a high and moderate degree of confidence for harmful gambling in children and young people¹⁸:

High confidence (due to the number of studies finding consistent results):

- Impulsivity
- Substance use (alcohol, tobacco, cannabis, and other illegal drugs)
- Being male
- Having depression

Moderate confidence (due to a lower number of primary studies):

- Number of gambling activities they participated in
- Problem of gambling severity
- Anti-social behaviour
- Being violent

- Poor academic performance
- Peer influence

Adults

- PHE's gambling-related harms evidence review (2021) combines datasets from the Health Survey for England across four years (2012, 2015, 2016 and 2018) and reports several key trends for problem gambling in adults^{19,20}:
 - Rates of problem gambling differ most significantly by demographic factors such as sex and age, with men 4.2 times more likely to be harmful gamblers than women, and males between the age range of 25-34 having the highest prevalence of problem gambling.
 - Economic factors also play an important role, with problem gambling most common in respondents who were currently unemployed (2.1%) in comparison to those in employment (0.7%) and differing significantly between the most (1.2%) and least deprived IMD quintiles (0.2%).
 - Low life satisfaction and well-being are correlated with an increased incidence of problem gambling (1.7% and 1.6% respectively), with poor mental health a stronger predictor of harmful gambling than poor physical health.
 - Alcohol consumption is a key risk behaviour that increases the likelihood of problem gambling, with there being a significant correlation between number of alcohol units consumed per week and increased problem gambling. The heaviest drinkers were found to be 7.8x more likely to engage in harmful gambling than non-drinkers.
 - Trends between overall gambling and problem gambling were reversed for several indices, suggesting a paradox of harm whereby certain groups suffer disproportionately high rates of problem gambling. For example, although the Asian and Asian British ethnic group had the lowest prevalence of at-risk gambling by ethnicity group, they had the highest prevalence of problem gambling (1.1% compared to 0.5% for White/White British ethnicity group).
 - Further to this, according to the British Gambling Prevalence Survey 2010, Asian and Asian British individuals were over 3 times more likely to suffer gambling related harms, and Black or Black British individuals were nearly 2 times more likely than their White counterparts.²¹
- Studies have indicated a link between homelessness and problem gambling. Researchers from the University of Cambridge found that 11.6% of the homeless population were problem gamblers in comparison to 0.7% in the UK general population. These figures indicated that problem gambling is more prevalent within the homeless population, who are over ten times more likely to experience problem gambling than the general population. Several reasons are considered for this prevalence, they include the financial incentive to escape poverty, alleviation of boredom and the provisions of a warm, sheltered establishment.²²
- Although males are more likely to be problem gamblers than females, one million women are now deemed to be at risk of suffering gambling harm in the UK, with the danger particularly acute during winter months.²³ Moreover, females experiencing high levels of gambling harm are more likely to be younger, of lower social grades, or from a BAME background.²⁴ Recent findings from Gambling Aware show that, among women experiencing high levels of harm, two in five (39%) are unwilling to seek treatment due to shame and embarrassment.²³

Military Veterans

- There is plenty of evidence to suggest that military veterans are at heightened risk of problem gambling compared to the general population. However, little is known about the extent and impact of problem gambling in UK based veterans. A 2017 report published by Swansea University found that veterans were more than 8 (1.41%) times likely to develop problem gambling in comparison to non-veterans (0.17%).²⁵

- Following the transition to civilian life, some evidence suggests that military veterans (men in particular) may engage in more high-risk behaviours such as drug and alcohol misuse, risky sexual behaviour, and excessive gambling. This is often further accompanied by mental health issues such as depression, anxiety and potentially PTSD.²⁶ As previously discussed, problem gambling is a well-known co-morbidity linked to these behaviours, suggesting that military veterans could be a vulnerable group that may benefit from additional support.
- A new joint study conducted by Swansea University, due to be published later this year, has measured sociodemographic characteristics, gambling experience and problem severity, mental health, and healthcare resource utilisation in a large veteran sample. The study demonstrated that veterans had higher social and healthcare costs to society, greater contacts with the criminal justice system and higher rates of problem gambling and accrued debt compared to the general population.²⁷
- There are multiple military bases within Hertfordshire, and the ONS estimates the local military population to be around 36,000 individuals, a sizeable potential at-risk group.²⁸

Deprivation

- There is evidence to suggest that gambling provision is concentrated in areas of higher deprivation, indeed, 2019 figures from the Office for National Statistics (ONS) show the greatest number of betting shops concentrated in the most deprived deciles for both crime and health inequalities.^{29,30}
- More affluent areas where there are a number of services dedicated to supporting vulnerable populations (addiction centres, mental health facilities etc.) must also be considered “at risk” localities where individuals may come to harm from problem gambling.²⁹
- There was little variation in overall participation in gambling in England by IMD quintile. Yet there were statistically significant differences when overall gambling was broken down by type. For example, scratch cards and bingo were statistically significantly higher in the most deprived quintile compared to the least deprived quintile. Conversely, those purchasing the National Lottery were statistically significantly higher in the least deprived quintile than the most deprived.¹⁹

Impact of the COVID-19 pandemic

- Access to gambling venues during COVID-19 lockdown restrictions was affected due to the closure of non-essential premises including pubs, betting shops, bingo halls, arcades, casinos and live racing venues in March 2020, with casinos not reopening until August 2020.^{31,32} Restrictions on opening times for gambling premises came into force in September 2020.³³ Non-essential premises were then forced to close again in November 2020.³⁴
- The closure of these premises led to concerns that gambling would shift to online forms and that stress and boredom would fuel gambling participation and exacerbate gambling problems.³⁵
- The Gambling Commission quarterly telephone survey data in Great Britain demonstrated that overall gambling participation significantly decreased from 47.2% in the year ending December 2019 to 42.0% in the year ending December 2020. They found that, within the same period, online gambling significantly increased from 21.1% to 23.6% which is thought to be mainly driven by increases in National Lottery participation online which simultaneously decreased in person. The findings indicated that problem gambling reduced from 0.6% to 0.3%, but this was not statistically significant.³⁶
- A rapid review by PHE investigated the impact of the COVID-19 pandemic on gambling-related behaviour and harms. Database searches were conducted between January and October 2020. They found³⁷:
 - There was a reduction in overall gambling during March to June 2020, though this should be viewed with caution as most studies used self-reported data.

- Despite concerns, most studies found a decrease in online gambling though some studies showed increases.
 - In those who increased gambling during the first lockdown, boredom and having more free time were seen as motivating factors for this increase.
 - Those who gambled more during lockdown had an increased likelihood of having higher PGSI scores and of being a younger age. This suggested that younger and problematic gamblers may be at a higher risk.
 - There were few studies investigating gambling-related harms during the lockdown and more research is needed in this area.
- A scoping review analysing 24 full-text articles in February 2021 suggested that gambling behaviour either remained unchanged or reduced for most gamblers during the pandemic.³⁸ However, problem gamblers appeared to be at greater risk for increased gambling, further highlighting that they may be a vulnerable group.
 - Data drawn from a survey of over 75,000 adults living in the UK during the COVID-19 pandemic found that³⁹:
 - Of those who had participated in any gambling behaviour at baseline (n=7026), 79.4% reported no change in the frequency of gambling during strict lockdown (March-June 2020) compared to before lockdown, 11.4% had decreased their gambling, and 9.2% had increased their gambling frequency.
 - Men and current smokers were less likely to have increased their gambling frequency, while the employed, those who reported boredom as a source of stress, frequent alcohol drinkers, and individuals with 10 or more anxiety or depression symptoms were more likely to have gambled more often during strict lockdown compared to before lockdown.
 - Current gamblers reported trying one or more new games for the first-time during lockdown.
 - As lockdown restrictions eased, individuals of ethnic minority backgrounds, who were current smokers, and with lower educational attainment were more likely to continue gambling more than usual.
 - The study also emphasized the importance of assessing lower risk gambling behaviour and highlighted the concern that the UK is facing a potential economic recession. Recessions in the past have been linked to an increase in gambling.

Local strategies, local services, and interventions

Strategies

- As of 2022 there is no single local government strategy in place to address gambling harms in Hertfordshire. Existing local policies require in depth review, this is due to the agreed shift in addressing gambling harms, which will utilise a public health approach.⁴⁰

Gambling Harms Topic Group

- This Topic Group meeting was carried out on 11th January 2022, with the objective of identifying how partner organisations across the country are working to tackle gambling-related harms, and to begin formulating cross-sector solutions to collectively tackle these harms within Hertfordshire. It was agreed that the focus should be on anti-gambling-harms rather than an anti-gambling sentiment.
- Using this multi-agency approach, the aim was to assess the current strategies, barriers, financial implications, and partnerships that exist for gambling harms within the county, identifying possible constraints regarding legislation and draft a set of actions to initiate at local level.

Gambling Topic Group key strategies:

- **Education and outreach:** Talking to school age CYP is vital. It is also important to involve parents and carers in the conversation so that CYP are not alone and left to peer pressure. Social media is now providing unfiltered access for CYP, with betting companies associated with their favourite football teams constantly showing up on feeds.⁴¹ It was suggested the topic could be introduced onto the OFSTED agenda nationally, and at a local level as part of the PHSE curriculum in schools.¹⁶ This would ideally encompass the impacts of gambling on individuals and society, discussing the tactics used by industry to encourage gambling, and the nature of the gambling product itself. This includes the massive shift in betting availability as gambling companies have an increasingly dominant online presence.⁴² Early education has the possibility to increase pupil's knowledge about gambling harms and where to seek support, promote open conversations, and help children to make safe choices about gambling.^{43,44}
- **Kitemark status:** The Hertfordshire kitemark was introduced by the Strategic Leads for Mental Health in Schools, the status is achieved when schools and colleges contribute to the support of children's mental health and wellbeing. Currently it does not address problem gambling in its 11 key areas, leaving a potential platform to address gambling harms.⁴⁵
- **Improving access to treatment and support for ethnic minorities.** Ethnic minorities are less likely to gamble but much more likely to suffer from gambling-related harm and less likely to receive treatment.^{46,44}
- **Strengthen regulation around advertising.** Free money offers online have caused individuals to gamble with money they do not have and fall into problem gambling where they otherwise potentially wouldn't have. Consider banning advertisement at sporting events and ensure underage sports figures do not wear gambling operator's logos on their kit to begin breaking the link between sports and betting.¹⁵ For example, the Coalition Against Gambling Ads (CAGA) is an anti-gambling campaign working with various sports clubs, including Lewes and Headingly FC, and anti-gambling organisations like Gamcare, with the goal of removing all gambling advertising, promotion and sponsorship from sport.
- **Treatment:** Hertfordshire NHS Trusts currently have no commissioned services. Existing independent organisations are bearing the load of treating gambling addiction. Collaborating with existing addiction treatment centres to build comprehensive services will enable healthcare providers to tackle gambling addiction more effectively. This should be funded by a new statutory levy on the industry, owned by the NHS, and delivered to a nationally agreed Quality and Outcome Framework (QOF).⁴²
- **Recognition:** There is a need for gambling-harms recognition at 'frontline level' within community groups and this requires relevant trained support workers and members of the public health workforce. There is an opportunity for the introduction of gambling screening tools provided by the integrated care system due to the link between mental health conditions and gambling. This is particularly important in high-risk areas with increased levels of poverty and alcohol misuse.

Local services

Gamcare

- [GamCare](#) is the leading national provider of free information, advice, and support for anyone affected by gambling harms, operating the National Gambling Helpline and providing treatment for those who are harmed by gambling. GamCare works with a range of partner organisations to create a national network of free, confidential treatment. GamCare offers face-to-face treatment options in St Albans and Hitchin and [Gamcare's online treatment](#), based on cognitive behavioural therapy, can be accessed by anyone who is concerned about their gambling behaviour (once they have completed a screening process).

- Gamcare works with local authorities to develop training across a range of stakeholders working in frontline roles, for example teachers, GP's, police and probation workers, youth workers and many more. It is particularly active within: [youth support](#), [women's services](#), homelessness and employment support sectors, and the [criminal justice system](#).
- The organisation and its partners have been working in and alongside the Criminal Justice System (CJS) in Hertfordshire for several years to support gamblers who have entered the system. [Gamcare's two-year pilot](#) was implemented between 2018-2020 to provide a range of bespoke end to end services across the CJS to support individuals experiencing gambling-related harms:
 - Established a network of 13 supporting criminal justice organisations with access to people experiencing gambling-related harm across the CJS (including probation teams, prison teams, police custody suites and voluntary sector organisations).
 - Trained 517 professionals working within the CJS to raise awareness of the links between crime and gambling.
 - Developed a single question screening tool for gambling harm, implemented at 11 key points, with referral pathways to appropriate support.
 - Delivered support and treatment to people on probation and in prison through one-to-one sessions and workbooks.

The Living Room

- [The Living Room](#) Hertfordshire provides free, holistic support to people suffering from all addictions (including gambling addiction) and their families. First established 20 years ago in Stevenage, they now operate from several hubs across the county including St Albans, Stevenage, Watford, and through an online Hertfordshire hub.
- The main addiction support groups are held 5 days a week at each hub and offer group therapy for up to 20 people suffering from all kinds of addiction. The charity recommends people attend all 5 days to make the most of the sessions.
- Sessions are coordinated by two trained counsellors and focus on topics such as reducing stigma, speaking about feelings in a safe space and promoting individual empowerment through setting shared aspirations and hopes for the sessions.
- The Hertfordshire hub offers online group therapy up to 5 days a week for people unable to access local in-person support. There is also capacity for onward referrals should these be deemed necessary, which includes family referrals which may be particularly relevant for problem gamblers.⁴⁹

Hertfordshire Citizens Advice Services

- [Hertfordshire Citizens Advice Services](#) (HCAS) seek to promote and develop the provision of advice-giving services to the citizens of Hertfordshire. Their recent [Gambling Support Service Project](#), commissioned by GambleAware, was implemented from Stevenage across the East of England between April 2019 and May 2021. The aim of the project was to reduce the impact of gambling-related harm by providing training and raising awareness; attending events and working with professionals; gathering data through screening and assessments; and advocating for a public health approach to gambling-related harms.
 - Citizens Advice Stevenage successfully managed and held 37 training sessions to 461 delegates and delivered 72 awareness events.
 - They screened and provided information to more than 86 clients and provided specialist support to 4 clients by referring them to professional services.
- Although funding for the project has since ended, the service still maintains a social media presence to offer advice on gambling and gambling-related harms in Hertfordshire.

Herts for Learning

- [Herts for Learning](#) (HfL) is a non-profit company who work closely with HCC to ensure that all children in Hertfordshire receive an education which helps them to thrive. They support schools to deliver the statutory relationship and health curriculum, within which there is a strong focus on online behaviour and harms, including the harms of gambling. They also deliver staff training to individual schools on online safety and address gaming, addiction, and gambling issues. Finally, the HfL Wellbeing team release termly online safety newsletters – one for staff in schools and one for parents and carers – which highlight issues, reports and resources that are made available for schools, many of which link to the risks of gambling.⁴⁰

Sanctuary Lodge

- [Sanctuary Lodge](#) is a residential rehabilitation centre in Halstead that offers support for gambling addiction including addictions to poker, casino, online, betting, racing, slot machines, lotto, and scratch cards.
- The support available includes CBT, 12-step therapy, counselling, and holistic psychotherapy approaches. The centre also has the facilities for family therapy to acknowledge and begin to heal the rifts caused by addiction within the family unit. One year of free aftercare is also provided after discharge.⁵⁰

Gamblers Anonymous

- [Gamblers Anonymous](#) (GA) is a charity organisation that provides support to individuals wishing to stop their problem gambling. All members have previous experience with gambling addiction themselves and exist in a fellowship who adopt certain spiritual principles that help them maintain abstinence. The focus is on promoting a sharing environment where addicts feel supported by others and talk about their issues to make a change. There are no counsellors present, only other addicts, and are chaired by those who have gone through the process themselves and have been free from problem gambling for some time.
- Different types of meetings focus on different stages of recovery, such as newcomers' meetings, mixed meetings with family and friends and steps meetings centred on the 12-steps to recovery.
- GA operates all over the country. In Hertfordshire, meetings can be accessed in Borehamwood, Hertford, High Wycombe, Hitchin, St Albans, Stevenage, Watford.⁵¹

Additional Support

Homelessness Charities in Hertfordshire:

- Homeless people are more likely to be at-risk of problem gambling. There are several homeless charities and shelters operating in and around Hertfordshire including [Helping Herts Homeless](#), [Dens](#), [Haven First](#), [New Hope](#), and [Herts Young Homeless](#). Most of these services aim to also provide health and social advice and support to homeless people to begin the transition into stable, permanent accommodation.
- These organisations offer provision of 1 – 1 advice on economic, health and emotional well-being for people who are or are about to become homeless. Herts Young Homeless also offers mediation services for young people and their family members, as well as an intervention service for mental health and substance misuse (in partnership with New Hope and Hertfordshire Change, Grow, Live (CGL)).⁵²
- While gambling is not mentioned specifically, support and advice could still be available if requested, or consideration into the possibility of adding this kind of support to their services could be made.

Healthy Hubs in Hertfordshire:

- [Healthy Hubs](#) in Hertfordshire are based in every local district and are there to offer information, advice, and support on how to improve health and well-being, as well as sign-posting residents to relevant local services.⁵³ Gambling services that Healthy Hubs signpost to differs at each Healthy Hub but includes signposting to GamCare and the NHS Stop Gambling pages. Some Healthy Hubs have received training from GamCare. Anecdotal evidence from Healthy Hubs suggests that discussions about gambling and click-throughs to the GamCare website are very low.

Support for Carers

- Within Hertfordshire, to our knowledge, there are currently no services that are offering specific support for carers of people with a gambling problem. However, [Carers in Herts](#) have expressed an interest in opening an avenue for this type of support within the next six months.
- Although not physically based in Hertfordshire, [GamFam](#) offers an extensive recovery and support programme for the family members of people with a gambling disorder which can be accessed online by Hertfordshire residents. This programme, GRA5P, is a systematic 5-stage approach to helping the whole family towards recovery, incorporating peer support to connect families in similar positions.

Licensing and regulation in Hertfordshire

- Local authorities are required to license and review all gambling/betting premises within their area.⁵⁴ This task is delegated to District Councils in Hertfordshire, who have their own gambling policies outlining their application requirements. Due consideration of CYP and vulnerable people are expected to be at the heart of license applications.
- The recurring tenet of Hertfordshire Districts gambling policies echo guidance issued by the Gambling Commission, encouraging potential licensees to take into consideration Local Area Profiles (LAPs) created by district councils when creating Local Area Risk Assessments for their applications.⁵⁵
- Operators must be aware of areas of deprivation and/or the concentrated presence of CYP and vulnerable populations within specific areas of the district, as well as their premise proximity to places where there are likely to be a higher number of at-risk individuals (like schools, addiction centres and recreation areas). Operators are then expected to outline policies they will implement to mitigate potential risks to individuals, should they arise.
- Local Risk Assessments have been mandatory under the Gambling Commissions licensing conditions and Code of Practice since 2016. Operators are required to compile and maintain local risk assessments for each of their individual premises within a given area, make copies available to licensing regulators and keep copies on the premises themselves for spot checks and ad hoc inspections.⁵⁶

Mitigating the risks of community Lotteries in Hertfordshire

- A community lottery is a scheme commissioned by local councils or organisations to raise money for the wider local area and good causes. Community members are invited to purchase tickets that are entered into a weekly draw and participants have the chance to win prizes. Between 50 – 60% of the revenue will support the local Voluntary and Charity Sector (VCS).⁵⁷
- Within the county, [Broxbourne](#), [East Hertfordshire](#), and [Hertsmere](#) have community lotteries in place. [St Albans](#) and [North Hertfordshire](#) are in the process of commissioning one, and [Stevenage](#) has a community lottery scheme, but this is run jointly by the Stevenage Football Club Supporters Association (SA) and Sterling Management Centre, not the council.
- North Hertfordshire had plans for a community lottery approved in 2020 and were required to put in place policies to mitigate risks and promote social responsibility before an operating license was granted.

- Risks surrounding problem gambling were identified, for example, the aim of the community lottery is to support the VCS, and therefore requires beneficiaries to promote the lottery to their clients and supporters. This could be problematic if the organisation does not support lotteries or gambling or works with gambling addiction, potentially ruling them out of receiving vital additional funds.
- The district council intends to mitigate risks by focusing on the core message of supporting the local community and VCS, moving away from a direct spotlight on the prize money. Furthermore, if it becomes apparent that there are issues linked with problem gambling, the council can place caps on the number of tickets bought, and the lottery website will contain links to gambling support organisations.
- Regarding the protection of CYP and vulnerable persons:
 - Self-validation of age (16+ years) is required upon creation of an online account. This is achieved through tick boxes and birth date verification. Spot checks may also be taken of new players and a final age verification will be required before any prizes are issued, through validation of photo ID.
 - Direct Debits may be set up to allow weekly entry into the prize draw and inbuilt time lags ensure a delay between ticket purchase and prize draws which limits players capabilities for instant gambling and helps reduce the risk of problem gambling.
 - This is echoed in the Councils social responsibility policy, whereby limits imposed mean individuals cannot gamble beyond their means. These limits are monitored and can be adjusted should a large number of individuals reach those limits each week.⁵⁷
- North Hertfordshire's license was granted by the Gambling Commission in October 2021 and St Albans in December 2021, but they do not appear to have yet launched the schemes.

Effective interventions

Guidelines

- There are currently no NICE guidelines for the treatment of problem gambling and, therefore, according to the Royal College of Psychiatrists, the Australian National health and Medical Research Council (NHMRC) 2011 guidelines developed by Monash University are often used.⁴¹ NICE guidance for Gambling: Identification, diagnosis and management is due to be published in February 2024 and is currently in the scoping phase.^{58,59}
- The NHMRC guidelines summarised findings from 34 randomised controlled trials and said that in most situations individual/group cognitive behaviour therapy (CBT), motivational interviewing and motivational enhancement therapy should be used to reduce gambling and gambling severity.⁶⁰ Gambling severity can also be reduced through practitioner-delivered psychological interventions and these should be chosen over self-help interventions for people with gambling problems.⁶⁰
- Antidepressants should not be used to reduce gambling severity in those who have gambling problems without comorbidities of depression and anxiety, whilst naltrexone could be used to help reduce gambling severity in some people with gambling problems.⁶⁰
- Treatment and support groups for problem gambling include GamCare, the National Problem Gambling Clinic, National Centre for Gaming Disorders, NHS Northern Gambling Service, Gamblers Anonymous UK, and residential courses which can offer support, advice, counselling, and CBT.⁶¹

Brief interventions

- A meta-analysis found that in-person brief interventions (such as personalised feedback, psychoeducation, goal setting or advice) were associated with small but statistically significant reductions in gambling behaviour in adults compared to assessment only controls at short-term follow up.⁶² However, there were a limited number of studies included and more research into online forms of support should be explored in light of the COVID-19 pandemic and changes to in-person services.

Group therapy

- Although a group approach to CBT has been shown to improve gambling outcomes, a randomised controlled study comparing it with individual CBT found that the latter had superior results at the 6-month follow-up.⁶³ During this period, 92% of the individual CBT group no longer had criteria for gambling disorder, compared with only 60% of the group CBT group participants.
- Twelve-step facilitation (TSF) groups, which follow similar principles to Gamblers Anonymous, demonstrate comparable improvements in reducing gambling severity to CBT. A study comparing the efficacy of node-link mapping-enhanced cognitive-behavioural group therapy (CBGT mapping) and TSF group treatment for pathological gambling found significant improvements in gambling outcomes in both groups compared to a wait-list control.⁶⁴ These improvements were still present at the 6-month follow-up, providing support for the utility of group treatments for problem gambling.⁶⁴
- A scoping review of the literature on Gamblers Anonymous (GA) groups as a recovery pathway for problem gamblers found mixed results regarding the effectiveness of GA either as a control condition or in conjunction with formal treatment or medication.⁶⁵ In general, more formal treatments such as CBT, imaginal desensitisation and motivational interviewing were found to be superior to GA in reducing gambling behaviours. However, future research assessing the efficacy of GA would benefit from recruiting larger samples and from evaluating the impact of attendance on GA outcomes.⁶⁵

Online interventions

- One randomised controlled trial explored web-based interventions and email-counselling for adult problem gamblers with up to a one-year follow-up. The web-based intervention 'Check Out' included counselling by psychotherapists, a diary to record gambling behaviours which counsellors' feedback on, and interactive exercises. Email counselling consisted of time-lagged message exchange.
- 'Check Out' participants had significant improvements in problem gambling severity, well-being, gambling days and highest stake compared to those on a waiting list. Those who did email counselling showed improvements in problem gambling severity, however, 'Check Out' was seen as more effective due to the wider outcomes and a stronger working alliance.⁵⁸

Screening and support post-treatment

- A mapping review in 2021 found that there are few primary studies assessing gambling interventions and evaluation evidence is weak.⁶⁶ This also applies to screening interventions to identify those at risk from gambling-related harms and on-going support for them after treatment.⁶⁶ Based on their experience of collaborating with organisations working with complex cases where gambling may be one of multiple priorities to address (e.g., within the CJS), or where time with a client is limited (e.g., GP surgeries), GamCare advocate for a single screening question as an efficient and streamlined method of assessment.⁶⁷
- The Advisory Board for Safer Gambling suggests incorporating skills training (including digital training) to identify and support problem gamblers within the NHS Improving Access to Psychological Therapies (IAPT) programme.¹³

Pharmacological Treatments

- Although there are currently no licensed pharmacological treatments for gambling disorder in the UK, there is promising evidence regarding the efficacy of certain medications in treating problem gambling.⁶⁸
- A recent meta-analysis of pharmacological treatments for disordered gambling found that opioid antagonists and mood stabilizers produced significant and medium effect sizes for the reduction of global symptom severity. Mood stabilizers were also significantly associated with a reduction of financial loss from problem gambling.⁶⁹

What do the statistics show?

These statistics are based on the national prevalence found by the [Health Survey for England](#) in 2018 and are then applied to the Hertfordshire estimated population for those aged 16+ years:⁷⁰

- In 2018, it was estimated that 54% of the Hertfordshire adult population (n=509,817) or 40% excluding the National Lottery (n=377,642) had gambled.
- In 2018, there was an estimated 0.5% of the population (n= 4,720) who reached the threshold to be considered problem gamblers.
- In that same year, 3.8% (n=35,876) of the Hertfordshire population could be classified as at-risk gamblers. This is defined as low-or moderate-risk gambler who may experience some level of negative consequence due to their gambling.

The Young People's Health and Wellbeing Survey (YPHWS) is run by the Hertfordshire Public Health and Intelligence Team, gathering self-reported information regarding the wellbeing of children and young people in order to inform commissioning groups of their health behaviours and needs.

- Data from the 2021 Young Person's Health and Wellbeing Survey shows that 2.4% of secondary school aged young people expressed gambling as a worry (based on 11,681 responses).

Table 1: Current gambling premises and licensing by Hertfordshire district.

District	Total gambling premises*	Premises per 10,000 population	Licensed gambling permits by local authority**
Broxbourne	84	8.69	14
Dacorum	114	11.68	15
East Herts	60	3.86	10
Hertsmere	114	10.81	19
North Herts	78	5.84	13
St Albans	36	3.83	6
Stevenage	66	5.33	11
Three Rivers	54	3.62	9
Watford	114	7.51	19
Welwyn Hatfield	66	7.49	11
Hertfordshire	785	6.57	127

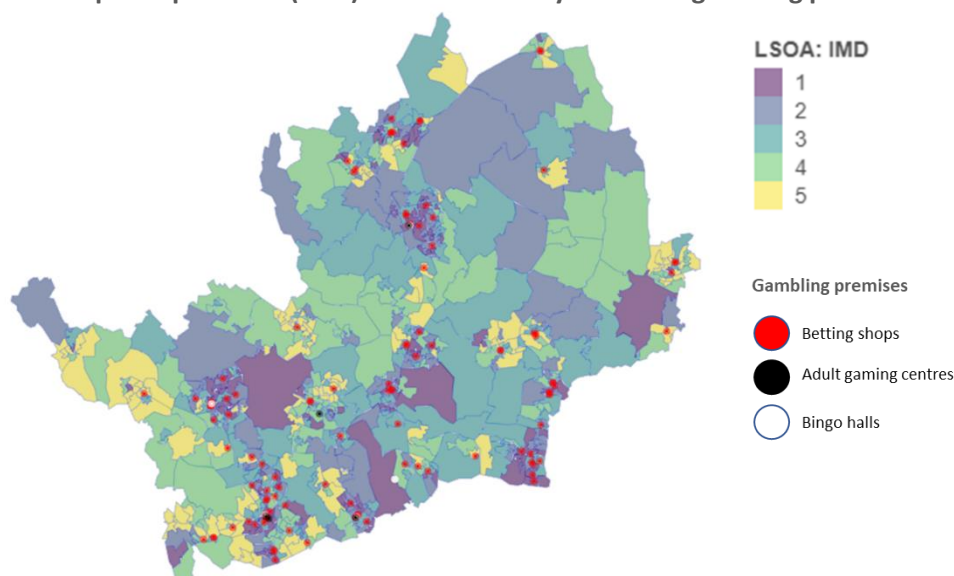
Source: Full premises register, The Gambling Commission, 2022; ONS 2020 Mid-Year Population Estimates, HertsInsight.

*Gambling premises may include: betting shops, alcohol premises with gaming machines, registered clubs with gaming machines, casinos, family entertainment centres, adult gaming centres and bingo halls.

**This data is subject to change based on licensing updates received from each local authority.

Figure 1: Hertfordshire LSOAs by Hertfordshire IMD Quintile and Hertfordshire gambling premises.

Index of Multiple Deprivation (IMD) at LSOA level layered with gambling premises



Notes: IMD figures have been calculated locally
Source: Gambling Commission (Jan 2022) and IMD 2018

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- A mapping exercise to position gambling premises according to Lower Layer Super Output Areas (LSOAs) and the LSOAs' level of deprivation appeared to show clusters of gambling premises mostly in areas of greater deprivation.

Limitations

- Data on the licensed number of gambling premises in Hertfordshire districts was extracted from the Gambling Commission website. However, data directly from the Hertfordshire districts illustrated a different number of premises. Therefore, it was difficult to ascertain the true number of licensed gambling premises in Hertfordshire. As recording of premises varied between districts, data from the Gambling Commission website was selected for this report, however this may contain some inaccuracies.
- The Hertfordshire data for gambling prevalence, problem gambling and at-risk gambling are estimations where the prevalence was taken from the Health Survey for England and applied to the Hertfordshire estimated population. This estimation did not consider differences between the populations in Hertfordshire and England, such as differences in deprivation and ethnicity, which may influence the gambling prevalence.
- Certain population sub-groups may be obscured from national and local gambling prevalence data due to their exclusion from the Health Survey for England or because of a reluctance to admit that they gamble. For example, children under 16, homeless people, undocumented migrants, and the travelling community all may be excluded from national surveys which provide gambling prevalence data. There is also evidence to suggest that certain ethnic minority groups have difficulty coming forward about their gambling due to it being a stigmatised behaviour.
- This report has been conducted whilst the COVID-19 pandemic is still ongoing. Future studies may provide more conclusive evidence regarding the effect of the pandemic on gambling behaviours, which will need to inform future policy and interventions.
- There is no single central system for gambling treatment and no reliable referral pathways. There is a need for updated NICE guidelines and a working referral system between primary care and specialist units. Increasing the provision of treatment for problem gambling and pooling resources into prevention

means there is a need to build capacity within the workforce, with particular focus on primary care. There are already major shortfalls in the number of staff working in GP surgeries and out in the community, and the current lack of funding will mean that additional recruitment and training will be difficult to achieve.¹³

- The NHS Long Term Plan states the need for 14 new blended treatment centres that can provide support for gambling addiction across England.⁷¹ No statutory levy and cuts to funding mean that this is not currently a full-scale financial possibility.⁷¹

Recommendations

Integrated support

Community-based, integrated problem gambling support and treatment

- Consider increasing collaboration between local voluntary and community sector organisations, NHS Trusts and clinical commissioning groups to try and identify what cross-partnership support can be achieved and delivered to help identify and support at-risk and problem gamblers, particularly for those who are most vulnerable.
- Explore the gap between the level of gambling support required and the current support provision funded by the local government and NHS services and consider whether there is a need for commissioning of additional services at the community level.
- Explore the potential of introducing signposting to gambling support services as part of the upcoming [Hertfordshire Integrated Health and Wellbeing system](#) which aims to have multiple points of access (taking a 'No Wrong Door Approach') to support residents needing help.
- Consider incorporating skills training for primary care practitioners to identify and support problem gamblers within the NHS Improving Access to Psychological Therapies programme.

Targeted support

Specific recognition of non-modifiable risk factors within support services

- To help address gambling related harm in ethnic minority groups, local services could consider implementing culturally sensitive projects and outreach networks for ethnic/religious minorities to help build trust in the support available within these communities and reduce the shame associated with accessing help.
- Local gambling support services could consider working together with local homeless and veterans' charities to look at offering specialist support and advice for those high-risk groups with gambling problems.
- Carer support organisations within Hertfordshire could consider incorporating information and support for gambling addiction into their available resource base, including signposting to existing services and other support networks within Hertfordshire. Partnerships could be established between local carer support groups and gambling support groups (such as GamFam) to provide an integrated support system for those caring for people with gambling addiction.
- Hertfordshire services should consider reaching out to GamCare to access their free training and develop appropriate tools for engaging with people who present with a gambling problem, or who are concerned about someone else's gambling. Services could utilise GamCare's specific women and youth programmes to understand the signs of problem gambling in these cohorts who are experiencing a rise in problem gambling, and yet, who are not readily accessing support services.

Public health campaign

- A public health campaign to promote awareness of gambling harms and support services could be beneficial to target at risk groups. Utilising various media platforms, such as social media, local TV/radio advertising, and an internet presence, could maximise its reach.
- Posters could be displayed on local noticeboards in community hubs such as sports clubs, bars and pubs, private clubs, job centres and possibly places of religious worship.
- A potential collaboration with large sports clubs in Hertfordshire could also be explored, following the example of the anti-gambling campaigns promoted by Lewes and Hedingly FC. Stevenage and Watford football clubs both have large followings within local communities and could provide a route to access at-risk individuals.

Screening for early identification and signposting to existing services at the earliest possible stage

- Introduce screening for gambling problems at entry points into a range of support services, such as voluntary organisations like Healthy Hubs and Citizens Advice, or homelessness and/or rehabilitation services where problem gambling could appear co-morbidly, to identify the problem early and signpost people to appropriate services. This could take the form of a single question, such as the one implemented across the Criminal Justice System in Hertfordshire, which asks ‘has your gambling, or the gambling of someone close to you, had a negative effect on your life?’.
- Develop tools to evaluate the effectiveness of this screening question, or any other screening method, for the services that screen for gambling problems.

Children & Young People

Increase Hertfordshire specific data, in particular relation to CYP

- Consider extending questions relating to gambling in the Young People's Health and Wellbeing Survey to help identify more specifically where issues lie and whether problem gambling services are needed for young people. This could include adding a gambling section that broadly follows the structure taken by the smoking and alcohol sections. These include providing information on:
 - How regularly, if ever, a young person has taken part in gambling.
 - Whether anybody in their family environment has taken part in gambling.
 - What type of gambling-related activity the young person has participated in.
 - Whether the young person would like to stop or reduce their gambling habit.

Education for CYP within county level curriculum

- When the School Mental Health Kitemark Accreditation scheme is next refreshed, ensure that ‘increasing awareness of gambling-related harms’ is included within the accreditation criteria.
- As PSHE lessons relating to gambling harms are currently optional, potential voluntary and community sector collaboration with schools to highlight the importance of gambling awareness education could be beneficial.

Regulation of gambling and data collection

- Frameworks could be drawn up to further explore the differences between data on licensed premises between the Hertfordshire districts and the Gambling Commission. If the Gambling Commission databases do not reflect up-to-date data from the districts, local authorities could consider the potential

of increasing district cross-collaboration to establish a local, up-to-date database of licensed gambling premises.

- Hertfordshire's Public Health Evidence and Intelligence team could explore and consider extending the mapping exercise to include the distribution of gambling premises in relation to other risk factors such as ethnicity or homelessness. If results from this mapping exercise are relevant, Local Area Profiles and Risk Assessments could be reviewed and potentially updated by district authorities to ensure that due consideration is given to vulnerable groups in the granting of gambling permits.
- Continue to consider and mitigate the risks of community lotteries by imposing caps on the number of tickets bought, verifying the buyer's age, and continuing to review the potential benefits and risks of the scheme regularly.

Appendix 1: Considerations for Risk Assessments for Gambling Premises

District	Risk assessments should consider:
Broxbourne 2019 – 22	<ul style="list-style-type: none"> Local crime statistics, antisocial behaviour, and proximity to addiction centres. Pre-existing problems associated with gambling premises and with CYP attempting to access local gambling facilities.
Dacorum : 2022 – 25	<ul style="list-style-type: none"> Where in the local area there are high levels of deprivation and vulnerable persons. Proximity to schools and areas where CYP congregate (shops, cafes, bus stops etc.).
East Hertfordshire : 2019 – 22	<ul style="list-style-type: none"> Where in the local area there are high levels of deprivation and vulnerable persons. Proximity to schools, youth, or medical centres.
Hertsmere : 2018 – 21	<ul style="list-style-type: none"> Proximity to schools, clubs, parks, cinemas etc., and known areas of youth anti-social behaviour. Gaming promotions that coincide with financial payments (pay day/benefit pay day), proximity to hospitals, residential care homes, GP surgeries, council housing offices or job centres, or addiction clinics. Proximity to places of worship (e.g. Mosques, Churches, Temples, and Synagogues etc.).
North Hertfordshire : 2019 – 21	<ul style="list-style-type: none"> Proximity to schools and places CYP congregate, areas with pre-existing issues with anti-social behaviour, and premise layout to discourage CYP from gaining access. Proximity to hospitals, addiction centres, residential care homes, GP surgeries, self-exclusion lists and problem gambling trends. Places of worship and other gambling facilities, banks, cash points, post offices, establishments selling alcohol and local crime statistics.
St Albans : 2022 – 25	<ul style="list-style-type: none"> Proximity to schools, public swimming pools/leisure centres, shopping malls, parks, and recreational areas.
Stevenage : 2010 – 13	<ul style="list-style-type: none"> Licensing objectives that should consider the protection of CYP and vulnerable persons and the prevention of gambling from being a source of crime and/or disorder.
Three Rivers : 2019 – 22	<ul style="list-style-type: none"> Where in the local area there are high levels of deprivation and vulnerable persons. Proximity to schools and areas where CYP tend to congregate (shops, cafes, bus stops etc.). Unemployment, homelessness, and proximity to addiction centres.
Watford : from 2009	<ul style="list-style-type: none"> Specific points on local risk assessments not detailed. Clause 9.10 does state that particular attention will be paid to the protection of children and vulnerable persons from being harmed or exploited by gambling.
Welwyn Hatfield : from 2018	<ul style="list-style-type: none"> Limited information on safeguarding: <i>“Licensees must assess local risks posed by the provision of gambling facilities at each of their premises, and have policies, procedures, and control measures to mitigate those risks. In making risk assessments, licensees must consider relevant matters identified in this licensing authority’s statement of licensing policy and any local area profiles published by the Council”.</i>

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