



GamCare's response to Neath Port Talbot Council – Consultation on the revision of statement of principles under the Gambling Act 2005

About GamCare:

GamCare is an independent charity and the leading provider of information, advice, and support for anyone affected by gambling harms. We operate the National Gambling Helpline, provide structured support for anyone harmed by gambling, and create awareness about safer gambling and treatments. For 26 years, our confidential, non-judgemental services, have supported more than half a million people to get their lives back on track.

We hold data locally and nationally through our National Gambling Helpline. We also work closely with those who have lived experience in shaping and delivering our services and programmes, ensuring that all our work is coproduced with our lived experience community at its heart.

GamCare's comments on the revision of the statement of principles:

- We welcome the position Neath Port Talbot Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles.
- Local authorities can play a greater role in reducing gambling harm, particularly for those of our clients who experience harm in land-based gambling venues, due to council's licensing responsibilities.
- It is vital that Neath Port Talbot Council develops a local picture of the level of gambling harms, in order to best target resources and tailor service provision. This could be achieved by gathering data from the National Gambling Helpline, as well as those already providing services in the area.
- Building on the proactive approach the council is already taking, we would like to see Neath Port Talbot Council commit in its statement of principles **to a public health approach** to gambling.
- This commitment should include training frontline and primary care staff to recognise the signs of gambling harm and develop referral pathways to the National Gambling Helpline or local treatment providers. GamCare has worked with Haringey Council to implement a similar system, that has received widespread support.
- In the absence of Cumulative Impact Assessments as a method by which the "aim to permit" approach can be challenged, Neath Port Talbot Council should continue to pursue a [Local Area Profile](#) approach that specifically analyses gambling risk, and use this data as a basis from which to scrutinise and possibly oppose a licensing application.
- The changes to Neath Port Talbot Council's statement of principles should be viewed in the context of the Gambling Act Review and subsequent process of white paper consultations, so take account of the rapidly changing regulatory environment.

Neath Port Talbot Statement of Gambling Licensing Policy 2025: Comments¹

Ref.	Wording	SBUHB Comment
		<p>General Feedback</p> <p>Swansea Bay University Health Board Public Health Team welcomes the opportunity to engage in the consultation process of Neath Port Talbot’s Gambling Policy 2025.</p> <p>Swansea Bay University Health Board has committed to becoming a population health focused organisation. We have a corporate responsibility for the health and wellbeing of our population, not only for those who we see through routine or clinical practice. On 30th March 2023 our Board approved “A Better Future for All: Swansea Bays Population Health Strategy”. Swansea Bay Population Health Plan (nhs.wales)</p> <p>The Population Health Strategy commits us to acting with our partners to improve population health, the wider determinants of health, and reduce inequalities. This includes action across the ‘Marmot’ policy objectives:</p> <ul style="list-style-type: none"> • Give every child the best start in life • Enable all children and young people and adults to maximise their capabilities and have control over their lives • Create fair employment and good work for all • Ensure a healthy standard of living for all • Create and develop healthy sustainable places and communities • Strengthen the role and impact of ill-health prevention • Tackle racism, discrimination and their outcomes • Pursue environmental sustainability and health equity together

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		<p>We acknowledge the economic returns from gambling, however, there is a need to balance these benefits against the considerable, wide-reaching harms that evidence has shown can result from gambling. Compulsive or harmful gambling is a pattern of excessive gambling with impaired control over gambling behaviour and substantial negative consequences can be derived from persistent excessive gambling (Blank et al., 2021).</p> <p>Gambling can result to such a degree that it compromises, disrupts or damages family, personal or recreational pursuits” (Public Health England, 2019). A 2019 report by Public Health Wales and Bangor and Swansea Universities identified that 3% of Welsh adults were identified as “at-risk” gamblers and 1% as “problem” (harmful) gamblers. The same report identified that some of the social groups most likely to experience gambling harms are those who are already experiencing inequalities, such as people who are unemployed or on low incomes, people from black and minority ethnic backgrounds, and those with mental health problems (Rogers et al., 2019). phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/</p> <p>Equally important in this context, there can be considerable negative effects experienced by the wider group of people around a gambler. The health and wellbeing of partners, children, and friends can all be negatively affected. Harm can also extend to employers, communities and the economy. The numbers of those who experience harm as a result of gambling by others will be considerably greater than the number of people who harm themselves. The effect on people that have chosen not to gamble themselves is an important justification for taking actions at a population level. Gambling-related harm as a public health issue - December 2016 (ctfassets.net)</p>

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		<p>We note the reference made in the policy regarding the Council’s Corporate Plan for 2024-2027 but there is no explicit link describing how the gambling licensing policy will support the aims and objectives of the Corporate Plan.</p> <p>We also note the reference to the Neath Port Talbot’s Public Service Board Wellbeing Plan and the Wellbeing Objectives. In the Gambling Licensing Policy, we would like to see a greater emphasis on how the policy will support the delivery of the Wellbeing Objectives specifically the steps outlined designed to achieve Wellbeing Objective 2: All our communities will be thriving and sustainable.</p>
<p>3.0</p>	<p>Neath Port Talbot Council Local Area Profile</p>	<p>We would like to see the development of a Local Area Profile, whether contained in the policy or as a supplement to the policy. This aspect of the policy is currently underdeveloped. A Local Area Profile would support the work of NPTCBC to consider the local approach to the permitting of gambling, enhance its regulation, enhance the prevention of gambling related harms based on the local profile, and identify specific local circumstances that could increase harm from gambling. In the absence of a published local area profile, risk assessments to new licence applications are based upon anecdotal information that lacks the necessary rigour to appraise the associated harms of outlet location and outlet density.</p> <p>Evidence suggests that the gambling industry is reliant upon individuals becoming harmful gamblers. A 2020 House of Lords report suggested that 60% of industry profits come from just 5% of gamblers who are already experiencing problems or are at risk of doing so. The report goes on to state that: “the people most at risk are also the most profitable to the industry: the greater the problem, the bigger the profit.” A 2020 study by John et al. cited qualitative research in which participants raised concerns “that industry</p>

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		<p>advertising targets poorer populations who may be more susceptible to the false hope of escaping desperate socioeconomic situations.”</p> <p>phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/</p> <p>Furthermore, it is the responsibility of the licensees to also assess the local risks to adhering to the licensing objectives both in their application to operate and maintain good business practices. There is no statement regarding ‘relevant matters for consideration’ (39.1) other than the licensing objectives included in the licensing policy; no area profile developed to consider risk or a means to account for significant change in local circumstances which may warrant enhanced mitigation strategies.</p> <p>As it currently stands, ‘the authority should aim to permit the use of premises for gambling’ as stated in 4.3, however Neath Port Talbot Council could strengthen their support for new and current premises to adhere as effectively as possible to the Licence Conditions and Code of Practice Social Responsibility code requirements.</p> <p>This is approach lacks sufficient rigour and is not supportive of effective regulation, protection for specific population groups nor does it offer operators the intelligence they need to maintain good practice.</p>
3.5	Operators will be expected to have considered the appropriate well-being objectives within their risk assessments as outlined in paragraph 39 of this policy, paying particular attention to the	We welcome the inclusion of ‘paying particular attention to the protection of children from harm and the high levels of deprivation and personal debt within Neath Port Talbot’, however Neath Port Talbot Council could strengthen their support for new and current premises to develop an intelligence led risk assessment which would be supported by a Local Area Profile.

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	protection of children from harm and the high levels of deprivation and personal debt within Neath Port Talbot.	
13.3	It is appreciated that moral objections to gambling are not considered a valid reason to reject applications for premises licences and also unmet demand is not a criterion for a Licensing Authority.	We are supportive that the Licensing Authority does not accept 'unmet demand' as a criterion to issue a license.
13.4	The Licence Conditions and Code of Practice (LCCP) issued by the Gambling Commission commencing in May 2015 places further onus on premises to complete a risk assessment based on code 8, the social responsibility code. The Licensing Authority will have regard to this code when considering applications.	As mentioned previously, we recommend that NPTCBC develop a local area profile as recommended by the Gambling Commission. This aspect of the policy is a weakness and does not support operators to adhere to the Social Responsibility code requirements.
16.11	As regards the term "vulnerable persons" it is noted that the Gambling Commission is not seeking to offer a definition, but states that "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who are gambling beyond their means; and people who may not be able to make informed or balanced	There is currently no published Local Area Profile (LAP) to support a 'case by case basis' on which to make a decision regarding this licensing objective about vulnerable persons or vulnerable populations. Currently NPTCBC will be reliant solely on the LAP provided by the license applicant and local anecdotal information. We feel that there needs to be a more scientific and rigorous approach to the checks and balances placed around this objective to minimise and mitigate against any risks posed to our most vulnerable communities.

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	<p>decisions about gambling due to a mental impairment, alcohol or drugs”. The Licensing Authority will consider this licensing objective on a case by case basis.</p>	
<p>16.16</p>	<p>The Licensing Authority will have regard to the Chief Medical Officer for Wales report to support the licensing objective to protect children and other vulnerable persons from being harmed or exploited by gambling.</p>	<p>We welcome the regard of the Chief Medical Officer for Wales report regarding the harms of gambling which describes, ‘at a population level, there are lots of people experiencing small amounts of harm from gambling, and a small number of people that experience high levels of harm.</p> <p>Action to reduce harm from gambling should not focus solely on individuals but should include a wide range of measures including advocacy, information, regulation and appropriate prohibition in a co-ordinated way.</p> <p>Gambling with our Health - CMO Report 2017 (gov.wales)</p>
<p>39.23</p>	<p>This local risk assessment process, although similar requires a much broader range of considerations when identifying local risk. The requirement of the Commissions LCCP social responsibility code provision is that gambling operators consider the local area in which the premises are situated and the impact that the premises operation may have on the licensing objectives.</p>	<p>As mentioned previously, we recommend that NPTCBC develop a local area profile as recommended by the Gambling Commission. This aspect of the policy needs strengthening in the current policy to support operators to adhere to the Social Responsibility code requirements.</p>
<p>39.6</p>	<p>Matters relating to vulnerable adults, including:</p>	<p>As mentioned previously there can be considerable negative effects experienced by the wider group of people around a gambler. The health and wellbeing of partners, children, and friends can all be negatively affected. The</p>

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	<ul style="list-style-type: none"> Information held by the licensee regarding self-exclusions and incidences of underage gambling. Gaming trends that may mirror days for financial payments such as pay days or benefit payments. Arrangement for localised exchange of information regarding self-exclusions and gaming trends. Proximity of premises which may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependent people may congregate, credit / money lending shops, pawn shops etc. 	<p>numbers of those who experience harm as a result of gambling by others will be considerably greater than the number of people who harm themselves.</p> <p>Of the individuals living in Wales who received support from the National Gambling Treatment Services in 2020/21, 66% were male, 39% were aged between 25 and 34, and 93% were from a White British background. Almost all of them (98%) had scores of eight or higher on the Problem Gambling Screening Index (PGSI), indicating that they were "problem" gamblers. Improvements in PGSI score were seen in 94% of those completing treatment, compared to 51% among those who dropped out (GambleAware, 2022c). GamCare provided data on calls received to the National Gambling Helpline between 2018 and 2022 from individuals with a postcode in Wales. During that period, the helpline received 3,384 calls from 1,721 individual callers. Callers were more likely to be male, and in the 26 to 35 years age group. Callers reported that they were seeking support for a range of gambling-related harms, but those most commonly mentioned were anxiety and stress, family and relationship issues, and financial concerns. There is an identified need in Wales to raise awareness of the support and treatment available for people if they feel they are experiencing harm from gambling.</p> <p>phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/</p> <p>We raise this because the current system relies on gamblers self-referring into services and specific vulnerable population groups will be underrepresented in this data. We would like to see supplemental information and an explicit strategy on the interventions NPTCBC intend to employ when problem gamblers are identified. The measures outlined in the policy are an inadequate approach to the needs of problem gamblers and the wider group of people around the gambler.</p>

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		<p>We would like to see greater work undertaken in this area which would align with the steps described under Wellbeing Objective 2 of the Wellbeing Plan 2023-2028. With particular regard to: ‘Make sure those who need help and support with the cost of living know what support is available and how to access it’ and ‘Identify gaps in help and support and how those gaps could be addressed’</p> <p>Furthermore, we would like to see within the policy a requirement for licensed premises to market the support services available for those experiencing the negative effects from gambling.</p>
		<p>Swansea Bay University Health Board Public Health Team are grateful for the opportunity to engage in the consultation process of Neath Port Talbot’s Gambling Licensing Policy 2025.</p> <p>We would welcome further on-going dialogue around the population health harms of gambling across the authority area and how we can collaboratively reduce harms of gambling for the population of Neath Port Talbot.</p>