TITLE OF REPORT: Local Area Profiles and developing research evidence on vulnerability to gambling related harm

REPORT OF: Strategic Director, Communities and Environment

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1. Purpose of Report

To provide Members of the Licensing Committee with an update on recent research into the way that local authorities can protect vulnerable people from gambling related harm by improving the understanding of local area risk. It will focus on some work commissioned by Westminster and Manchester City Councils which was published in 2016.

2. Background

The Gambling Act 2005 gave local authorities responsibility for issuing premises licences for gambling venues. The advice contained within the Act was that licensing authorities should "aim to permit" premises licences so long as applications are reasonably consistent with the following objectives:

> (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,

> (b) ensuring that gambling is conducted in a fair and open way, and

> (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

More recently, there have been some changes in the recommended approach to gambling licensing and regulation, as expressed in various documents published by the Gambling Commission. These changes can be summarised into three broad themes:

> • increased focus on risk and risk regulation;

> • greater attention to local area risk, and

> • encouragement of partnership and collaboration between stakeholders to mitigate risk.

In addition, a further change is the devolvement of public health to local authorities and their new responsibility to protect the health and wellbeing of people in their local communities.

To date, there has been little investigation about who may be vulnerable or why. Information about the characteristics of who is more or less vulnerable to gambling-related harm has only been considered in very general terms using

evidence from large-scale national surveys, such as the British Gambling Prevalence Survey (BGPS). How vulnerability and harm may vary at a local level has not been explored.

In 2015 Westminster and Manchester City Councils commissioned a study to:

- to explore and document the range of characteristics that suggest someone is vulnerable to harm from gambling,

- to investigate how these characteristics can be measured at a local level, using a range of different data, and

- to develop a local risk index model showing areas where those who may be more vulnerable to harm are located with the aim of mapping results visually, so that areas of potential risk are highlighted with the intention that these results become a tool for both local authorities and industry when making decisions about the location of gambling venues, helping them to think through the specific needs of local communities and enabling them to work together to develop plans to protect vulnerable people

3. Policy context

In the years since the Gambling Act 2005 was implemented, there have been some noticeable shifts in how gambling premises are distributed. A major change is that many gambling premises have moved from back street to high street locations and there has been rising concern about how some premises are 'clustering' in certain areas.

The Gambling Commission has made it a requirement that gambling industry operators should, from April 2016 conduct local risk assessments for premises to demonstrate that they understand local issues and to show what measures they propose to introduce to mitigate against this risk.

The introduction of local risk assessments reflects a broader policy movement which encourages local authorities, the regulator and the industry to work in partnership to address local issues and concerns. The assessments are required for all premises and operators need to demonstrate that they understand local issues and show what measures they propose to introduce or currently have to mitigate.

The Gambling Commission has also recommended that local authorities consider producing local area profiles to support their licensing statements and principles. The intention is that these local area profiles draw on information from a wide range of local bodies to further understand the nature of potential risks in each local authority and to develop more locally focused gambling policy.

A final important policy change is the devolvement of public health to local authorities. The Health and Social Care Act, 2012 gave responsibility for health improvement to local authorities. This gave each local authority a new

duty to take appropriate steps to improve the health of people in its area. The intention was for local authorities to have freedom in how they chose to improve their population's health and it was hoped that this would create a new focus on improving health and reducing inequalities. The Responsible Gambling Strategy Board (RGSB), the body responsible for providing advice to the Gambling Commission and Government about gambling, advocates that gambling is considered within a public health framework.

It is against this policy and regulatory background that the study was commissioned. The aim was to explore what area-based vulnerability to harm might look like and support these policy changes. Westminster and Manchester City Councils were used as case studies to demonstrate what a local area risk profile might look like when those vulnerable to gambling harm are identified, mapped and results displayed visually.

The intention is that the methods and outputs can be used by other local authorities and built into local area profiles, risk assessments and Statements of Licensing Policy.

4.   Findings

The first aim of this study was to consider the types of people who may be at greater risk of harm from gambling and where they might be located. Based on review of existing research evidence, it was concluded that the following groups are potentially more vulnerable to harm from gambling:

- youths
- people affected by substance abuse / misuse / excessive alcohol consumption
- poor mental health
- people living in deprived areas
- certain ethnic groups
- people with low IQs
- people with personality/cognitive impairments
- people seeking treatment for gambling problems
- people who are unemployed

Having identified these groups, the next stage was to bring this information together to create local risk indices, showing areas with greater concentrations of people who are more likely to be vulnerable to harm.

For each characteristic of vulnerability identified, using Westminster and Manchester as case study areas, the availability of local level data was reviewed. For some characteristics, there were good data available (for example, unemployment rates but for others there were no data available (such as low IQ).

Therefore, the final characteristics of vulnerability included in the models were those where there was a strong theoretical and empirical basis for inclusion and good local level data available.

Information from all different characteristics was brought together and visually displayed. Data were grouped into two different indices based on whether they related to:

- the characteristics of people who live in a local area (the resident profile) and/or,

- the location of local services which are likely to attract potentially vulnerable people to a specific place.

Data from the two indices were then combined to produce an overall gambling risk index for each area. These results were displayed visually on maps for Westminster and Manchester to highlight the locations which had relatively higher risk profiles.

In Westminster, four broad areas of greater risk were identified. The heightened risk in each area is driven by a range of different factors. For example, in Pimlico risk is higher because of a greater number of homelessness shelters and substance abuse treatment providers in this area. In the North West area, risk is driven by rates of unemployment, ethnic make-up and large numbers of resident young people.

In Manchester, many different areas of risk were identified which include areas around the city centre and the south of the city; Risk in the city centre is driven primarily by the concentration of pay- day loans shops, education establishments, younger residents and support centres for problem gamblers. Relatively high levels of unemployment as well as ethnic mix are major driving factors in the other locations.

Comparisons of the areas identified by the risk models with data on deprivation shows some overlaps but also some differences. For example, the City of Manchester has a relatively low score according to the Index of Multiple Deprivation (IMD) but was identified as higher risk of gambling harm in our models. This is because there are a range of services offered within the city that may draw potentially vulnerable people into the city centre. This is not represented in IMD scores which focus only on the profile of people living in an area. Because of this it was concluded that IMD is not a sufficient proxy to represent risk to gambling-related harm at a local level.

5.   Caveats

The models are probabilistic - just because an area is highlighted as being at greater risk, does not mean that all people in those areas will experience harm. The models suggest that there may be greater propensity for harm and therefore greater consideration should be given to attempts to militate this.

The models are based on current knowledge and available data - they are limited to areas where more research has been conducted and where good quality local level data are available.

The evidence base used to develop the models shows those vulnerable to gambling problems rather than gambling-related harm. The models may be conservative as gambling-related harm is broader than problem gambling.

6.   Recommendations of the Study

- The Gambling Commission's introduction of Local Area Risk profiles represents a new opportunity for local authorities and industry alike to think more deeply about the protection of vulnerable people from gambling-related harm. This means extending understanding of local area risk beyond mapping deprivation and considering a more nuanced range of factors.

- Local authorities interested in pursuing this approach should start to consider the different types of data they have available and how these can be used in local area profiles.

- Local authorities should also start to consider what data and/or evidence is missing and how they could fill these gaps, working with different departments within the authority to capture relevant information.

- The models developed are based on the best information currently available. An acknowledged limitation of gambling research is the paucity of evidence available. The study recommends that the models are periodically reviewed and updated to take into account growing knowledge, better data and changes in local areas.

Recommendation

It is recommended that the Committee gives its views on the evidence presented.

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