

## The City and County of Swansea Statement of Gambling Licensing Policy 2025: Comments<sup>1</sup>

Ref.	Wording	SBUHB Comment
		<p><b>General Feedback</b></p> <p>Swansea Bay University Health Board Public Health Team welcomes the opportunity to engage in the consultation process of the City and County of Swansea’s Gambling Licensing 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 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”. <a href="#">Swansea Bay Population Health Plan (nhs.wales)</a></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"> <li>• Give every child the best start in life</li> <li>• Enable all children and young people and adults to maximise their capabilities and have control over their lives</li> <li>• Create fair employment and good work for all</li> <li>• Ensure a healthy standard of living for all</li> <li>• Create and develop healthy sustainable places and communities</li> <li>• Strengthen the role and impact of ill-health prevention</li> <li>• Tackle racism, discrimination and their outcomes</li> <li>• Pursue environmental sustainability and health equity together</li> </ul>

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		<p>We note no reference made in the policy regarding the City and County of Swansea’s Wellbeing Plan and the Wellbeing Objectives. In addition, it would be beneficial to include the ‘Working Towards Prosperity for all in Swansea’ Tackling Poverty Strategy.</p> <p>We acknowledge the economic returns from gambling, however, there is a need to balance these 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>Harmful gambling is that which compromises, disrupts or damages family, personal or recreational pursuits (Public Health England, 2019). A 2019 report by Public Health Wales, 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).  <a href="https://phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/">phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/</a></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</p>

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		<p>effect on people that have chosen not to gamble themselves is an important justification for taking actions at a population level.</p> <p><a href="#">Gambling-related harm as a public health issue - December 2016 (ctfassets.net)</a></p>
<p><b>3.0</b></p>	<p>The City and County of Swansea Geographical Area</p> <p>Recommended LAP</p>	<p>We would like to see the development of a Local Area Profile as recommended by the Gambling Commission Licence Conditions and Codes of Practice (LCCP). This would support the work of CCoS 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 advertising targets poorer populations who may be more susceptible to the false hope of escaping desperate socioeconomic situations.”</p> <p><a href="http://phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/">phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/</a></p> <p>Furthermore, currently it is the responsibility of the licensees to assess the local risks to adhering to the licensing objectives both in their application to operate</p>

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		<p>and maintain good business practices. There is no statement regarding ‘relevant matters for consideration’ 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 12.3, however the City and County of Swansea could strengthen their requirements and 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>The draft approach proposed 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>
12.4	In accordance with the guidance, moral objections to gambling are not considered a valid reason to reject applications for premises licences and demand is not a criterion for a Licensing Authority.	We are supportive that the Licensing Authority does not accept ‘demand’ as a criterion to issue a license.
12.5	The Gambling Commission have also issued Licence Conditions and Codes of Practice (LCCP) which apply to all operators and personal licence holders. The LCCP strengthens the Social Responsibility (SR) code	As mentioned previously, we recommend that the City and County of Swansea develop a local area profile as recommended by the Gambling Commission. This aspect of the policy needs strengthening to support operators to adhere to the full Social Responsibility code requirements.

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	<p>requirements and imposes a formal requirement for operators to consider local risks. The Licensing Authority will have regard to the LCCP when considering applications.</p>	
<p><b>47.1</b></p>	<p>The Licensing Authority will encourage and will support local operators to create and maintain an information sharing network to discuss issues of problem gamblers that are identified. This will also be an opportunity for operators to discuss issues with the licensing officers</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 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><a href="https://phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/">phw.nhs.wales/news/harmful-gambling-early-education-key-to-addressing-urgent-public-health-issue/gambling-health-needs-assessment-for-wales/</a></p>

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		<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 CCoS intend to employ when problem gamblers are identified. Supporting an information sharing network between local operators is an inadequate approach in isolation to the needs of problem gamblers.</p> <p>We would like to see greater work undertaken in this area which would align with the primary and secondary drivers of the Live Well, Age Well Wellbeing Objective in City and County of Swansea’s Wellbeing Plan 2023-2028 around poverty and economic resilience.</p> <p>Furthermore, we would like to see within the policy a requirement for licensed premises to market and provide information on 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 the City and County of Swansea’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 Swansea.</p>