

Reducing Gambling Harms

Date: 21 June 2023

Report of: Director of Communities, Housing and Environment and Director of Public Health

Report to: Executive Board

Will the decision be open for call in? Yes No

Does the report contain confidential or exempt information? Yes No

Brief summary

This report provides a series of recommendations to the Executive Board in response to the Environment, Housing and Communities Scrutiny Board's 'Statement on Gambling Harm'.

The Executive Board is asked to consider the report contents and recommendations of a Scrutiny Board and respond, indicating what action (if any) it proposes to take.

The report outlines a recommended approach, taking into account the limited available resources and building upon the existing partnership approach that has been in place for several years.

It acknowledges that the current legislation governing gambling in the UK is outdated and that local authorities have limited powers. However, it emphasises that there should be a continued focus on collaborative projects with partners, gathering evidence and intelligence and responding to upcoming government consultations on the regulation of gambling.

Recommendations

The Executive Board is asked to:

- a) Consider the conclusions of the Scrutiny Board (Environment, Housing & Communities) as set out in this report and the further information and recommendations provided.
- b) Approve the approach set out in this report:
 - a. Formalisation of the Leeds Gambling Harms Group
 - b. Introduction of an annual reporting process
 - c. Respond to consultations resulting from the Government's White Paper on gambling reform
 - d. Respond to Government consultations regarding exposure to gambling products
- c) Agrees that the Director of Communities Housing and Environment be responsible for the implementation.

What is this report about?

- 1 In 2022, the Centre for Governance and Scrutiny, in conjunction with the Gambling Commission published a document titled '10 questions to ask if you are scrutinising gambling harm'. As the title alludes to, the document provides ten topic points to consider, but also a large amount of information and supplementary questions. The Licensing Committee considered a covering report and briefing note in November 2022 and subsequently, the same report, briefing note and background document were presented to the Environment, Housing and Communities Scrutiny Board and were considered. The briefing note can be found in **appendix 1** and both the publication and full report from the Environment, Housing and Communities Scrutiny Board held in January 2023 are available [here](#).
- 2 On 20th January 2023, Scrutiny Board (Environmental, Housing and Communities) held a consultative meeting to explore the local approach to reducing gambling harms. Having considered all the information provided in the report by Public Health, Financial Inclusion and Entertainment Licensing, as well as hearing from an expert witness Dr Matthew Gaskell, Consultant Psychologist and Clinical Director of the NHS Northern Gambling Clinic at the meeting, Scrutiny Board made five key conclusions (full report attached at appendix 2), which it has asked Executive Board to consider.
- 3 When compared to other local areas the work to address gambling-related harms in the city is well developed. The approach has been built on partnership and collaboration, which has been in place since 2016. The Leeds approach has been recognised nationally including by both the Local Government Association and the Gambling Commission and is a key reason for the city now hosting two treatment services (the NHS Northern Gambling Service and Leeds Community Gambling Service) in the city.
- 4 Leeds City Council's Public Health and Financial Inclusion teams co-lead partnership working arrangements, treatment service liaison and project delivery. Entertainment Licensing lead on the licensing of physical gambling premises, enforcement of these same premises and lobbying through the Local Government Association and liaison with the Gambling Commission.
- 5 Officers from Public Health, Financial Inclusion and Entertainment Licensing have considered the recommendations from Scrutiny Board and have made the following responses and recommendations to Executive Board:

Scrutiny Board Conclusion 1

Gambling harm should be regarded as a matter of public health, which risks exacerbating existing inequalities in Leeds. The Board recommends that a prevention and intervention strategy is adopted similar to those adopted in response to public health concerns linked to tobacco and alcohol use. This requires a joined up multi agency approach locally and nationally – including services such as financial inclusion, public health, housing, and licensing working in partnership with government, health, education and third sector organisations, operators, regulators, and treatment providers.

- 6 Gambling harms should be regarded as a matter of public health, and this has been the case since partnership working to address gambling related harms began in 2016. Public Health co-lead on the partnership working arrangements and project delivery in the city and will continue to provide advice, support, and evidence to guide possible interventions to reduce gambling harms.
- 7 Unlike the issues of tobacco or alcohol Leeds Public Health does not have the same investment for gambling harms and therefore would be unable to commit to prevention and intervention on the same scale. It should also be recognised that the prevalence and scale of harm caused by tobacco and alcohol use, particularly on health and social care, exceeds that of gambling harm.

Consequently, there is no additional capacity to commit to delivering a city-wide prevention and intervention strategy, like tobacco and alcohol.

- 8 The Council's local approach to gambling related harm is delivered successfully through a multi-agency approach and has been since 2016 when the Leeds Problem Gambling Group (now Leeds Gambling Harms Group) was introduced. Representatives from a wide range of services attend the quarterly meetings, including Financial Inclusion, Public Health, Entertainment Licensing, treatment services (Leeds Community Gambling Service/GamCare, NHS Northern Gambling Service, YGAM), Citizen's Advice, University money support teams, GambleAware and Leeds City Council Communications.
- 9 The partnership was recently refreshed, and key priorities identified by the group, based on evidence and local insight. These four priorities are:
 - a) Building and sharing the evidence base
 - b) Improving identification and recognition of gambling-related harm
 - c) Protecting children and young people from gambling-related harm
 - d) Reducing exposure of vulnerable people to gambling products
- 10 The priorities already contribute to aspects of the three pillars from the Best City Ambition but as the themes are developed, further consideration will be given to this to ensure that the pillars are embedded within the work programme. The work is also well linked to range of other city strategies and plans including the Thriving Strategy and Better Lives strategy. Work will continue to ensure that there is link up with relevant strategies and work areas.
- 11 On a national level, the Council is represented at a Communities of Improvement Group, coordinated by the Office of Health Improvement and Disparities (OHID), which brings together Public Health leads in Yorkshire and the Humber with a focus on gambling related harm.
- 12 It is recommended that:
 - a) The work of the existing Leeds Gambling Harms Group be built on through formalising governance and reporting arrangements, ensuring that the group can continue to play a strategic role in addressing gambling harms in the city. The introduction of revised terms of reference, an updated action plan to track progress and formal reporting would meet this aim.
 - b) An annual report updating on the progress of the partnership and associated work programmes could be provided to the most appropriate council board.

Scrutiny Board Conclusion 2

As part of a prevention and intervention strategy, the Board recommends the Executive Board explores how to support the expansion of work to raise awareness of the harms associated with gambling within communities, to reduce the stigma associated with gambling harms and promote ease of access to support and treatment.

- 13 Leeds City Council previously commissioned a marketing agency, Magpie, to create the 'Beat the Odds' marketing campaign based on local insight and learning from the 2016 Leeds Beckett research on the scale and awareness of problem gambling in Leeds. This campaign had the aim of:
 - a) enabling people in Leeds to be aware of gambling related harm, mitigate the impacts and know where to go for help and support on the issue.
 - b) raising awareness through that a campaign that will encourage openness in talking about the issue and start to reduce the shame and stigma associated with gambling addiction.

- 14 The campaign launched in 2017 and has continued to be the consistent campaign for Leeds, with further partnership work undertaken to develop and enhance the assets in line with emerging trends and relevant sporting events. This included the introduction of both horse racing and football themed assets.
- 15 As part of the Leeds Gambling Harms Group, a key theme has been identified around 'improving identification and recognition of gambling-related harm'. It is anticipated that there will be a communications focus, alongside existing engagement and training activity led by Leeds Community Gambling Service, as part of the work to address this theme, which is in its early stages. There will be an emphasis on engaging with culturally diverse communities as some groups experience a significantly higher risk of gambling harm despite lower overall participation.
- 16 There is no additional capacity available to expand the work undertaken but it is intended that the Leeds Gambling Harms Group will review the campaign to ensure that it continues to be effective.
- 17 Leeds Community Gambling Service are specifically commissioned to deliver engagement, outreach and training in Leeds by the national charity GambleAware. Leeds City Council has limited influence over the work of this engagement team, but an informal partnership agreement is in place to guide joint working.
- 18 As part of the engagement work that Leeds Community Gambling Service carry out, training is delivered to services that may work with people experiencing gambling related harm, to ensure that staff are aware of what gambling harms are and how best to signpost someone to support if they share, they are experiencing harm due to their gambling or the gambling of someone close to them (known as an 'affected other').
- 19 Regionally, the Association of Directors of Public Health (Yorkshire and the Humber) (ADPH Y&H) Gambling-related Harm Programme 2021-24 is funded through regulatory settlements (i.e. fines) and administered by the Gambling Commission. As these fines have already been paid to the Gambling Commission, the funding for this 3-year programme is guaranteed and ADPH (Y&H) has received this through a grant agreement. The main contribution will be development of campaigns and marketing materials and a quality-assured training package, targeted at the working age population.
- 20 The joint resource of the Leeds cross-council team and the ADPH Y&H Gambling-related Harm Programme cover research and evidence, education and prevention, increased awareness of treatment and support, marketing and campaigns.
- 21 It is recommended that:
 - a) The Leeds Gambling Harms Group continues to deliver and review the Leeds-focussed marketing campaign, as appropriate, and work with Leeds Community Gambling Service to deliver engagement, training, and outreach in the city.
 - b) The Leeds Gambling Harms group will explore the theme of 'improving identification and recognition of gambling harm' and will oversee council-led communications activity and provide an advisory function to support GamCare and NHS Northern Gambling Service with engagement to improve access to their services. Diversity and inclusion considerations will be a consistent priority, in line with the Council values.
 - c) Leeds Public Health intends to support and amplify the social marketing campaign funded by ADPH Y&H Gambling-related Harm Programme, to be launched this Summer. This will be coordinated though the Leeds Gambling Harms Group. The campaign aims to challenge stigmatising narratives, such as those focusing on individual responsibility and personal control, without acknowledging the influence that the gambling industry can have.

Scrutiny Board Conclusion 3

Early intervention and communication programmes in schools and other education settings should be a key part of the city's preventative approach to gambling harm. The Board welcomes ongoing efforts to support schools by providing the information, tools, and teaching materials necessary to engage pupils in conversations about gambling harm. The Scrutiny Board recommends that such programmes should begin in primary school.

- 22 Existing statutory duties within the Secondary PSHE Health Education curriculum require secondary schools to educate pupils on gambling harm. Whilst there is no mandatory requirement for primary schools to teach about gambling harms, statutory guidance regarding 'Internet Safety and Harms' and 'Online Relationships' do refer to online gaming and pupils recognising risk and harmful content online.
- 23 The LCC Health & Wellbeing Service/Healthy Schools already promote training opportunities to primary schools' staff, for example, this year's PHSE conference features a workshop on gambling with most delegates representing primary schools.
- 24 It is recommended that:
 - a) Leeds Public Health will continue to work with the LCC Health & Wellbeing Service/Healthy Schools to promote quality assured information, tools and training to schools and colleges.
 - b) Leeds Public Health will continue to commission the 'My Health My School' survey which is administered by the LCC Health & Wellbeing Service/Healthy Schools, to ensure that gambling questions continue to be included, and are regularly reviewed.
 - c) The LCC Health & Wellbeing Service/Healthy Schools is a member of the Leeds Gambling Harms Group, and the service will be asked to update on any gambling harm-related activity via this existing group.

Scrutiny Board Conclusion 4

Regulatory structures have not kept up with changes in the UK gambling sector, particularly with regard to online gambling. The Board recommends lobbying the Secretary of State for Digital, Culture, Media and Sport to reform regulatory structures – for example, to bring 'loot boxes' in video games within the scope of regulatory legislation and to prevent companies from targeting vulnerable people they know cannot afford the bets they are placing.

- 25 Local authorities are responsible for the regulation under the [Gambling Act 2005](#) and enforcement of the licensing of land-based gambling premises, such as betting offices. Online gambling and the regulation of the national companies is regulated by the Gambling Commission.
- 26 The volume of applications and complaints for land-based premises under the Gambling Act 2005 is very low, usually totalling one or two applications per year.
- 27 Entertainment Licensing undertake a programme of enforcement visits, not only on a complaint-led basis, but on a risk-based approach, and has recently undertaken these inspections in conjunction with GamCare's Leeds Community Gambling Service.
- 28 The Government has undertaken a systematic review of the Gambling Act 2005 with the resulting [White Paper](#) having been published since the Scrutiny Board met to consider this matter. The White Paper 'High Stakes: gambling reform for the digital age' seeks to make changes to the Gambling Act.

30 The White Paper makes several recommendations regarding online protections and intends to:

- a) Introduce background checks at moderate and high levels of spend, with lower thresholds for people aged between 18 and 24 to target those who are financially vulnerable and those whose spending may indicate harmful binge gambling.
- b) Introduce mandatory cross-operator harm prevention systems.
- c) Update the design rules for online products to produce safer products to prevent harm at source.
- d) Introduce stake limits for online slots, between £2 and £15 per spin with lower levels for 18 to 24 year olds.
- e) Consult on implementing improvements to player-set deposit limits, such as making them opt-out or mandatory.
- f) Regulate online competitions offering significant prizes, such as luxury homes.

31 It is recommended that:

- a) As the Government review of the Gambling Act has addressed online protections, the Council responds to any consultations that are relevant to online protections through the Licensing Committee and in consultation with the Leeds Gambling Harms group.

Scrutiny Board Conclusion 5

The Board further recommends that the Executive lobbies Government to identify mechanisms through which exposure to gambling products can be reduced – including through the introduction of a ban on gambling firms advertising on sports kits and at sports venues. The Scrutiny board would be happy to provide support as part of that.

32 The White Paper has considered the matter of advertising, sponsorship and branding:

- a) Gambling Commission to review the design and targeting of incentives such as free bets and bonuses and consult on its findings.
- b) Gambling Commission to consult on introducing controls over the types of marketing people receive including opting-in.
- c) Strongly encourage online platforms to introduce a facility to opt-out of all gambling adverts. The [Online Advertising Programme](#) will explore further mechanisms to reduce harm from advertising.
- d) The Government will strengthen informational messaging, including on risks associated with gambling, from point of purchase to messages within advertising.
- e) Removing industry ownership from such messaging, the DCMS (Department for Digital, Culture, Media and Sport) and Gambling Commission will work together drawing on public health and social marketing experience to establish the most effective messaging.

33 Scrutiny Board recommended that specific lobbying takes place around the advertising of gambling firms on sports kits and in sports grounds. Advertising rules have changed to prohibit prominent sports people, in particular Premier League footballers, from appearing in gambling adverts, on the grounds of the strong appeal to children.

34 The Premier League has announced that it will remove gambling logos from the front of football shirts from 2026/27 season. However, this voluntary move has not removed advertising from the sports grounds, or from other parts of the sports kit.

35 It is recommended that:

- a) The Council responds to any consultations around reducing the exposure to gambling products, including the recommendation that the current voluntary action should be made mandatory, and that it should be extended to include all parts of the kit and in sports grounds.

What impact will this proposal have?

- 36 If the recommendations are approved, a strategic approach to prevention and intervention activity would be delivered through existing established strategies, recognising that there is insufficient resource available to create a dedicated prevention and intervention strategy.
- 37 The expansion and formalisation of the current Leeds Gambling Harms Group would see the council formalise the existing multi-agency approach, continuing work with relevant partners including treatment services, university money support teams and Citizen's Advice. This would build on existing arrangements and expand the work to raise awareness of harms associated with gambling within communities, to reduce the stigma associated with gambling harms and promote ease of access to support and treatment.
- 38 As part of work to address prevention, work will continue in primary schools to support primary school staff to develop their awareness and internal processes to address gambling related harm. The existing statutory duties within the Secondary PSHE Health Education curriculum requires secondary schools to educate pupils on gambling harm. The My Health My School survey provides excellent localised data which can be used to enhance the existing programmes in schools through the Council's Health and Wellbeing/Healthy Schools Team.
- 39 Providing a multi-agency response to any consultations resulting from the Government's White Paper on the reform of the Gambling Act, with oversight from Licensing Committee regarding online gambling and reducing exposure to gambling products, could have a positive impact on protecting children and vulnerable adults from gambling related harm.
- 40 By successfully responding to Government consultations on the advertising on sports kits and sports grounds, there could be a reduction in the exposure of children to gambling products and the normalisation of gambling amongst vulnerable adults.

How does this proposal impact the three pillars of the Best City Ambition?

Health and Wellbeing

Inclusive Growth

Zero Carbon

- 41 Gambling harm should be regarded as a matter of public health, which risks exacerbating existing inequalities in Leeds. Adopting a strategic approach to prevention and intervention through learning from tobacco and alcohol approaches but within the context of the council receiving no public sector investment for this work, could help to increase health and wellbeing and reduce health inequalities.
- 42 It should be recognised that whilst Leeds is home to the headquarters and offices of several gambling firms providing valuable business rates and employment in the city, the economic cost of the harm caused by gambling is significant. A Public Health England evidence review, estimated that the economic cost in England is £1.05 to £1.77 billion. Due to lack of national and international evidence, this was likely to be an underestimate of the true cost. Land-based operators, including bookmakers, adult gaming centres and high street bingo establishments, are in the most deprived neighbourhoods in Leeds, on local high streets alongside business where residents buy their daily essentials. This disproportionate availability and accessibility of gambling opportunities may exacerbate the precarious financial situation that many households are already experiencing.
- 43 This proposal has no impact on zero carbon.

What consultation and engagement has taken place?

Wards affected: All

Have ward members been consulted? Yes No

44 No regulatory or statutory consultation is required in relation to these recommendations.

What are the resource implications?

45 The current activity of Leeds Public Health is to provide officer capacity to provide advice and support for the multi-agency Leeds Gambling Harms Group and contribute to regional efforts through the Office of Health Improvement and Disparities (OHID) such as the ADPH Yorkshire and the Humber Reducing Gambling Harm Programme.

46 Financial Inclusion provide similar resources and Entertainment Licensing provide ad-hoc advice and support. There is no scope to increase this capacity further due to existing financial pressures on the Council and the Council does not receive any direct public sector investment for gambling harm reduction.

47 The work recommended in this report will be absorbed into existing resources.

What are the key risks and how are they being managed?

48 It is the council's ambition to be the best city in the UK: one that is compassionate and caring with a strong economy which tackles poverty. The potential harm gambling poses directly affects this ambition. If Executive Board decide not to endorse the recommendations in this report, there is a risk that gambling harm may negatively impact on this ambition.

What are the legal implications?

49 There are no legal implications from the recommendations to this report.

Options, timescales and measuring success

What other options were considered?

50 To implement the Scrutiny Board conclusions in full, with a council-wide strategy based on that produced for tobacco and alcohol, would come at a significant cost. Leeds City Council does not have the same investment for gambling harms as for tobacco or alcohol, nor is the scale of harm equivalent to that of gambling, and therefore cannot commit to a prevention and intervention strategy on the same scale. As work has been ongoing since 2016, it is more cost effective to expand and formalise the current reduction in gambling harms work and to incorporate this into existing strategies.

How will success be measured?

51 As part of the proposals to formalise the Leeds Gambling Harms Group through new governance and reporting arrangements, it is proposed that success measures will be developed and agreed with the partnership within four months of the new arrangements being approved by Executive Board. Once agreed, these measures will be monitored over one year and reported on within the proposed annual report.

52 Government consultations on legislative change, such as those expected from the Government's publication 'High Stakes: gambling reform for the digital age' are released

periodically and are specific to a particular change. Therefore it is expected that there will be numerous consultations released over the coming years to address the points raised in the document. Each will be addressed individually and in consultation with the Leeds Gambling Harms Group, and with any other interested party, such as Scrutiny Board. The submission of the consultation response can be measured, and any such responses can be included as part of the proposed annual report.

- 53 Responding to Government consultations on the reduction of exposure to gambling products is unlikely to have an immediate tangible outcome that can be measured. Therefore the measurement of success will be limited to the sending of correspondence and providing information or research to the Secretary of State for the Department of Digital, Culture, Media and Sport.

What is the timetable and who will be responsible for implementation?

- 54 Overall, the Director Communities Housing and Environment would be responsible for implementation.
- 55 Public Health and Financial Inclusion Teams will implement the formalisation of the Leeds Gambling Harms Group. It is estimated that this work could begin soon after approval and would take approximately four months.
- 56 Entertainment Licensing will be responsible for coordinating a multi-agency response to consultations and the lobbying of Government on advertising.
- 57 Working together Public Health, Financial Inclusion and Entertainment Licensing would provide an annual report updating on the progress of the partnership and associated work programmes to the relevant Council Board or committee within 12 months of the decision of the Executive Board.

Appendices

- Appendix 1 – Gambling Harms Briefing Note
- Appendix 2 – Scrutiny Board Statement on Reducing Gambling Harm
- Appendix 3 – Equality, Diversity, Cohesion and Integration screening

Background papers

- None