



Gambling Act 2005

Draft Local Area Profile 2021

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1. Introduction

Nationally, gambling policy and the regulatory environment overall has an increasing focus on risk. While not compulsory, it is now recommended that a licensing authority creates a 'local area profile' to inform its understanding of risk and to allow appropriate decisions to be made and steps taken to mitigate these risks.

From April 2016, gambling establishment operators must undertake 'local area risk assessments' for all their premises and will be expected to give due consideration to the information available in the council's 'local area profile'.

Although not a compulsory requirement, we have included a local area profile in the proposed Gambling Act Statement of Policy to increase awareness of local risks and improve information sharing with gambling operators. This will facilitate constructive engagement with licensees and a more coordinated response to local risks.

The local area profile will help to inform the local risk assessment process. For example, if a gambling outlet is to be located within close proximity to a school, we would expect licensees to have sufficient controls in place to mitigate associated risks, for example implementing a robust Think 21 policy and ensuring that the premises is so designed that children cannot see gambling taking place. The Council believe that contribution to premises risk assessments and being knowledgeable and informed on the 'local area' and risks is necessary in order to provide sufficient detail within the assessment. This means that any assessments undertaken do need to have an involvement of and an understanding of the local area in which they operate and are licensed.

It is wholly anticipated that the council's Local Area Profile will develop over time and will be influenced by information and intelligence from researchers, key partners and other stakeholders.

2. Local area profile

The purpose of this document is to, in accordance with the [Gambling Commission's Gambling Guidance for Local Authorities](#), to highlight areas in the district inhabited or frequented by groups that might be more at risk of being harmed or exploited by gambling or suffer from problem gambling.

The Gambling Commission emphasise through their Licence Conditions and Codes of Practice (LCCP) that risk assessments (or Local Area Profiles) are of benefit to the licensing authority and the operators. As listed in the Guidance for Local Authorities, the benefits are:

- it enables licensing authorities to better serve their local community, by better reflecting the community and the risks within it
- greater clarity for operators as to the relevant factors in licensing authority decision making, will lead to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application
- it enables licensing authorities to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge

- it encourages a proactive approach to risk that is likely to result in reduced non-compliance and enforcement action.

3. West Suffolk's approach to the local area profile

The Gambling Act 2005 sets out three licensing objectives:

- 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 studies carried out by the Geofutures Gambling and Place Research Hub established the following criteria for groups that could potentially be more vulnerable to gambling:

- Living in more deprived areas
- Financial difficulties or debt
- Substance abuse or addiction issues (including problem gamblers seeking treatment)
- Poor mental health
- Unemployed
- Homelessness
- Ethnic minority groups.

West Suffolk Council has also expressed in its Statement of Gambling Licensing Policy that consideration be given to the proximity of gambling premises to:

- local schools, youth clubs, play areas and other premises directed at, or primarily used by children and young people
- places where vulnerable people are housed or treated
- areas where there are a high concentration of children and young people or vulnerable people.

The West Suffolk Local Area Profile seeks to capture all these criteria both in terms of location specific data and data associated with vulnerable or protected groups (such as deprivation indices).

4. Gambling as a public health issue

The last decade has seen many changes in the British gambling landscape. The most notable changes during this period include growth in the availability of remote gambling (particularly via the internet), the introduction of fixed odds betting terminals into most bookmakers, an increase in the number of casinos, an increase in the prominence of poker (both online and offline), and the introduction of online betting exchanges.

The most severe form of gambling, pathological (or problem gambling) is recognized as a mental health disorder. Pathological gambling is currently classified as an impulse control disorder, but it shares many important features with substance use disorders, especially in terms of diagnostic criteria, clinical course, and treatment.

All major current research has been undertaken at national level.

- 56.2% of the adult population (16 or over) have participated in some form of gambling in the last 12 months (2017). This is compared to 48% in 2010.
- The most popular gambling activity remains the national lottery. Excluding this, the rate is 42% of adults.
- The Gambling Commissions' [Industry Statistics for April 2019 - March 2020](#) show that remote (or online) gambling is now the largest industry sector, generating a Gross Gambling Yield of £5.7bn and comprising c.40% of the overall market. In 2020, almost one in four adults (24%) had gambled online in the last four weeks, compared to around one in six (17%) in 2015.
- Problem gamblers are most likely to be young, male, have parents who gambled regularly and smoke (0.8% of the overall population)
- 37% of 11 to 16-year-olds in England and Scotland gambled between 2019-20 and 1.9% are classified as 'problem' gamblers.
- Other risk factors include unemployment, poor health, those from Black Asian and Black British backgrounds and other substance misuse.

Definition of 'problem gambling'

Problem gambling is defined as an overwhelming urge to gamble despite negative consequences and the disruption or damage to personal, family or recreational pursuits.

While gambling is a relatively common pursuit in modern life and most people will gamble at least once in their lifetime without it becoming a serious issue, gambling releases a high level of adrenaline and serotonin in the brain, which can lead to addiction. Gambling can also be used as a solution to financial worries or may be an escape from stress.

The Impact of 'problem gambling'

The harms caused by gambling for the individual include anxiety, stress, depression, and alcohol and substance misuse. These factors are likely to have a wider impact on family and friends, including family breakdown, as well as neglect and violence. There are higher rates of separation and divorce among problem gamblers compared to the general population.

Further impacts of gambling include the inability to function at work, and financial problems that can lead to homelessness. The harms from gambling to wider society include fraud, theft, loss of productivity in the workforce, and the cost of treating this addiction.

'Problem gambling' is also considered a comorbidity - the term used to describe the existence of concurrent disorders in an individual. It also refers to the ways in which these disorders interact or interfere with each other.

As with all addictive behaviours, people who struggle with gambling disorders tend to have other psychological problems:

- unipolar or major depression

- bipolar disorder
- suicidal thinking, and
- substance misuse

Young people and problem gambling

The Gambling Commission estimates there are 55,000 problem gamblers aged 11 to 16 (2019). The Commission also found that 450,000 are gambling regularly, more than those who have taken drugs, drunk alcohol or smoked.

Factors linked with problem gambling in young people include:

- depression
- anxiety
- crime
- suicide
- alcohol and substance abuse, and
- poor school performance.

Gambling and debt

The first known UK research to focus exclusively on the relationship between problem gambling and over indebtedness, published in Autumn 2009, was jointly commissioned by GamCare and the Money Advice Trust from Manchester Metropolitan University. Key findings were:

- debts of up to £60,000 might be common amongst problem gamblers.
- understanding of problem gambling amongst money advice agencies and in the NHS is extremely low.
- awareness of the help available to problem gamblers amongst these agencies and in the NHS, particularly GPs, is equally poor.
- there is an urgent need to improve education about gambling for young people, alongside or as part of work on financial literacy and understanding chance and risk.

Online gambling

Online gambling does not sit within the local authorities remit, nor is it in the scope of this document. However, it is worth mentioning some information about online gambling as it is the fastest growing form of gambling, particularly among children and young people and more vulnerable groups.

- Three-quarters of 18 to 34-year-old online gamblers used their smartphones to gamble compared to only 14 per cent of those aged 65 and over.
- Most online gambling is still done within the home, but one in five (20 per cent) online gamblers have done so outside the home. This is particularly the case for gamblers aged 18 to 24 (44 per cent), while less than 2 per cent of those aged 65 and over had done so.
- Online gamblers hold an average of three accounts, but a significant proportion of younger gamblers hold more – an average of 4.7 accounts among 18–24-year-olds, compared to 1.7 held by over 65s.

- Data suggests that just under one in ten adults (9 per cent) has ever bet on eSports, up from 6 per cent in 2019. Once again, it is predominantly younger players who have driven this growth, with around a fifth of those aged 18 to 34 claiming to have ever placed a bet on eSports. The figure rises even further among young men, to over a third (36 per cent) of males aged 18 to 24.
- Overall, 10 per cent of adults had used the internet to gamble in the past year, including online lottery tickets, betting, casino games, bingo, online slot machines and football pools. This would estimate to around 17,300 people in West Suffolk. Increases in online gambling activity have been greater in women than men.

5. West Suffolk gambling premises

Across West Suffolk there is currently the following licensed premises:

- 27 betting shops
- 2 adult gaming centres
- 18 licensed premises with gaming machine permits
- 4 premises with club machine permits
- 1 betting racetrack (horse racing)
- 147 licensed premises with notices of intent (2 gaming machines)

These premises pose potential risks to those who reside, work, and visit West Suffolk in terms of associated crime and also in terms of 'problem gambling'.

West Suffolk premises

Breakdown of gambling premises is detailed below:

Town	Breakdown
Brandon	<ul style="list-style-type: none"> • 2 betting shops (High Street and Market Hill) • 1 licensed premises gaming machine permits
Bury St Edmunds	<ul style="list-style-type: none"> • 6 betting shops (St Andrews Street South, St Olaves Precinct, Hardwick Shopping Centre, Risbygate Street, Cornhill) • 1 Family Entertainment Centre Gaming Permit (Western Way) • 9 licensed premises gaming machine permits • 2 Club machine permits
Haverhill	<ul style="list-style-type: none"> • 5 betting shops (High Street and Queen Street) • 2 premises licence gaming machine permits
Mildenhall	<ul style="list-style-type: none"> • 2 betting shops (Mildenhall Market Place) • 1 licensed premises gaming machine permit
Newmarket	<ul style="list-style-type: none"> • 1 adult gaming centre (Wellington Street) • 1 horse racing betting track (Rowley Mile) • 12 betting shops (All Saints Road, The Rookery, High Street, Valley Way, Wellington Street, the Guineas) • 2 premises licence gaming machine permits

West Suffolk Council has a number of licensed premises (2003 act) that have two gambling machines (automatic entitlement) and are required to be registered with the appropriate fee paid. While these are not separately licensed, they will be inspected accordingly, and the council will review their activities within the guidance. It is expected that these premises will consider an appropriate risk assessment based on this the Local Area Profile.

6. Compilation of the local profile

In line with updated guidance, the council will use the Local Area Profile to support those using the Gambling Statement of Principles Policy. The profile will be maintained separately from the Statement to enable it to be updated accordingly.

Applicants are further encouraged to conduct research of the local area to identify issues or locations with a high prevalence of vulnerable persons.

7. Location and vulnerability data

The following tables give links to available data on West Suffolk and its communities in order to inform licensing applications and decisions.

Location data

Location criteria	Identified datasets and data sources
<ul style="list-style-type: none"> • Over concentration of betting premises • Local schools and educational centres • Play areas • Places of worship • Community facilities or public buildings • ATMs 	Geographical information that can be searched by postcode to find key features and facilities in the vicinity: using the West Suffolk Council Find my nearest tool.
Crime or criminal activity	Current local crime patterns and hotspots by location (see Police.uk)
Youth clubs	Suffolk Infolink - Community directory

Vulnerability criteria

Vulnerable persons criteria	Identified datasets and data sources
<ul style="list-style-type: none"> • Children and young people • Economically inactive residents • Minority ethnic groups 	Key population and health data broken down by local authority ward: West Suffolk Council - Ward reports

Vulnerable persons criteria	Identified datasets and data sources
Most deprived areas	Suffolk-wide statistics that can also be broken down by ward, district or shared authority and focus on the following themes: Suffolk Observatory Statistics on relative deprivation in small areas in England: GOV.UK - English indices of deprivation 2019
Financial difficulties or debt	Food banks – Suffolk County Council - Food Banks
Substance abuse or addiction	Suffolk Infolink - Health and care - search results
Poor mental health	Public Health England - National General Practice Profiles
Unemployed	Job centres can be found by using the West Suffolk Council Find my nearest tool.
Homeless	Information confidentially held by West Suffolk Council

Additional sources

- [GambleAware GB Maps | BeGambleAware](#)
- [GambleAware GB Maps | BeGambleAware](#)
- [Gambling Commission – Levels of Problem Gambling in England](#)
- [Gambling Commission – Young People and Problem Gambling](#)
- [Gambling Commission – Taking a more in-depth look at Online Gambling](#)
- [Gambling Commission – Industry Statistics, May 2021](#)
- [Gambling Commission – What do we know? National Strategic Assessment, 2020](#)
- [The Lancet Report – Tackling Gambling related harms as a Public Health issue](#)
- [Gamcare – Gambling related financial harm](#)

Appendix A

Participation in gambling activities

The following statistics have been sourced from the Gambling Commission report participation in gambling and rates of problem gambling across England in 2016:

- Overall, 56% of the adult population (aged 16 and over) spent money on some form of gambling in the past year. This equates to around 29.8 million adults in the UK. Applied to the estimated adult population of West Suffolk (179,248, Office of National Statistics Population estimates in 2017) this would amount to around 100,378 people in the authority.
- The most popular gambling activity was the National Lottery. In 2016, 41% of adults had bought tickets for the National Lottery Draw.
- Excluding those who had only gambled on the National Lottery Draw, 42% of adults spent money on some other form of gambling in the past year.
- After the national lottery, the next most popular gambling activities are scratch cards (20%), other lotteries (14%), horserace betting (9%), slot machines (6%) and sports betting (5%).
- The report noted a decrease in these types of gambling from 2015 to 2016, with the National Lottery down by 4%, scratch cards down by 2%, other lotteries by 1% and horse racing by nearly 2%.
- In line with this trend, betting on football pools, slot machines and online bets have also fallen slightly.

Profile of participants in gambling activity

- Men were more likely than women to gamble overall (60% for men and 52% for women). Women however had higher incidence participating in bingo and scratch cards.
- Gambling participation is associated with age – participation was lowest among the youngest and oldest age groups and highest among those aged 44 to 64.
- Gambling prevalence was highest among those who were:
 - either married or had been married (75%)
 - white or white British (76%)
 - those whose highest qualification was GCSE's or equivalent (76%)
 - those in lower supervisory/technical households (79%)
 - those in paid work (78%)
 - those with the highest personal income.

Gambling frequency

As of 2016:

- 59% of people who participated in the National Lottery did so once a week or more often. Only football pools had a similar level of frequency (54% once a week or more often).
- there were five other activities which were undertaken at least once a month by half or more of all participants. These were bingo played in person (54%), casino games played online (53%), spread betting (53%), fixed odd betting terminals (52%), and poker at a pub/club (50%).

- taking participation in all gambling activities together, past year gamblers took part in gambling, on average, on 93.6 days per year. That is, they tended to gamble more than once a week, but not quite as often as twice a week
- those who gambled both online and in-person did so more than twice as often (163.3 days) as those who gambled 'online only' (61.5 days) or 'in person' only (79.5 days)
- overall, 6% of regular gamblers were classified as high-time or high-spend gamblers
- the profile for high-time gamblers consists disproportionately of those with poorer socio-economic indicators, with National Lottery and Bingo being the most popular activities
- the profile for high-spend gamblers had a higher proportion of graduates, those in paid employment and a preference for betting on horse racing, slot machines and casino games
- when asked how their gambling involvement had changed in the past year, 4% reported an increase, 13% a decrease and 82% no change.

Appendix B

High level local profile

Population

- The population of West Suffolk is currently 178,881 (Office for National Statistics 2017) located within five main centres of population (Brandon, Bury St Edmunds, Haverhill, Mildenhall, Newmarket) and a number of smaller rural communities.
- Between 2017 and 2030, the population of West Suffolk is expected to grow by 8 per cent, compared to 9 per cent in England as whole
- West Suffolk has an ageing population. 20.9 per cent of the population is aged 65 and over, compared to the England average of 18.2 per cent.
- The West Suffolk population is less ethnically diverse than the England average – 86.3 per cent of the population are white compared to 79.8 per cent across England.
- 47.6 per cent of the population in West Suffolk consider themselves to be in very good health, roughly in line with the England average of 47.2 per cent.

Economy and skills

- West Suffolk saw a large increase in the number of people in employment between 2015 to 2016, with a rise of 3.98% compared to 3.12% across the United Kingdom (Business Register and Employment Survey).
- 82.9 per cent of West Suffolk's 16 to 64-year-olds are economically active. This is slightly higher than the 78.7 per cent England average.
- As of April 2017, 4% of the 16 to 18-year-old population in West Suffolk were not in education, employment or training (NEET), compared to 8.4% in England (Labour Force Survey).
- 15.4% of West Suffolk employees work in business and admin support services, 11.8% worked in manufacturing, 11.8% in health, 9.6% in retail and 7.9% in accommodation and food services
- In 2016, the percentage of residents aged between 16 and 64 with NVQ4+ level qualifications or more was 33 per cent, which is higher than the Suffolk average of 31.1 per cent but lower than the national average of 37.1 per cent (ONS Annual Population Survey).
- In 2018, the proportion of young people achieving 9-4 pass in English and Maths GCSE was 62.1 per cent, which is below the national average of 64.2 per cent (Department for Education).

Housing

- The average household size in West Suffolk is 2.4 people, in line with the England average.
- Between 2006 and 2016, the number of households in West Suffolk increased at a faster rate than the national average – 9.6 per cent compared to 8.6 per cent.
- By 2039, the number of households in West Suffolk is expected to increase by 20% compared to 2014 figures (Ministry for Housing, Communities and Local Government).
- In 2016, the lower quartile house prices to ratio of lower quartile gross annual earnings was 9.48 in Forest Heath and 9.55 in St Edmundsbury. The East region

average ratio was 9.29 and the average ratio for England was 7.26 (Office for National Statistics House price to residence-based earnings ratio).

- In 2018, the average monthly cost of renting a home in Forest Heath was £1,000 and £932 in St Edmundsbury. The average for England was £881 per month.
- In 2016-17 the number of people accepted as homeless increased significantly from 209 in 2015-16 to 242 in 2016-17 (Ministry for Housing, Communities and Local Government).
- The rate of homelessness in West Suffolk stood at 3.21 households per 1,000 between 2017-18. This is higher than the England average of 2.41 households per 1,000 (West Suffolk Council figures).