



Appendix B

Gambling Act 2005

Draft Local Area Profile 2025

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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 Challenge 25 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 the negative impacts of 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
- 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.

All major current research has been undertaken at national level.

A [Gambling Commission survey on gambling participation](#) carried out in March 2023 found that overall participation in any gambling activity was 44 per cent. The survey also found that 0.3 per cent of people experience issues relating to gambling and that the rate of those gambling at a moderate level of risk is 1.2 per cent and low level of risk is 1.8 per cent.

Likewise, according to a [study](#) in 2022, 0.9 per cent of young people experience issues and 2.4 per cent experience gambling at elevated levels of risk.

However, it is likely these estimates are conservative, and may not capture some vulnerable population groups.

A [YouGov \(2020\) survey found](#) that approximately 3.6 million (7 per cent) adults and children in Great Britain are negatively affected by someone else's gambling.

Definition of 'harmful gambling'

The [LGA](#) and the National Institute for Health and Care Excellence (NICE) define 'harmful gambling' as an umbrella term to describe any frequency of gambling that results in people experiencing harm. It includes those gambling at elevated risk of harm (low risk and moderate risk in the screening tools) as well as those experiencing 'problem' gambling. Gambling related harm is a broad concept that impacts a wide range of people, including families, colleagues, employers, and those within the wider community who may not have been involved in gambling themselves. Harms may include financial hardship, relationship breakdown, domestic abuse, mental health problems and suicidal thoughts.

It is important to note that anyone can be negatively affected by gambling. Gambling behaviours occur along a continuum, with possible harms dependent on the level of exposure. .

The circumstances that increase risk

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.

Harmful 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

Consequently, the LGA advises that councils should seek to prevent exposure at a population level to harmful gambling products and practices.

The key at risks groups or behaviours are:

- Young people
- unemployed and constrained economic circumstance
- area deprivation
- homeless
- mental ill health
- substance abuse or misuse
- personality traits or cognitive distortions
- people experiencing gambling harms who are seeking treatment.

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 an increasingly prevalent form of gambling, now accounting for over 38.2 per cent of the total market (as of 2023).

In a Statista survey ending in March 2023, around a quarter (25.9 per cent) of respondents in Great Britain answered that they had taken part in a form of online gambling in the past four weeks prior to being surveyed. This would estimate to around 46,607 people in West Suffolk.

The age group with the largest share of online gamblers was 45- to 54-year-olds, with 35.6 per cent of respondents in this demographic having gambled online in the stated period. Meanwhile, the age group that participated the least in online gambling in this period was 16- to 24-year-olds at 14 per cent, a decrease from a high of 17.7 per cent in 2022.

5. West Suffolk gambling premises

Across West Suffolk there is currently the following licensed premises:

- 2 or less gaming machines 143
- Club gaming permit 2
- Club machine permit 16
- Gambling premises licence 25
- Gaming machine authorisation 3
- Gaming mc permit 4
- Society Lottery Registration 83

These premises pose potential risks to those who reside, work, and visit West Suffolk in terms of associated crime and health impacts.

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"> • 2 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 	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.

<ul style="list-style-type: none"> Community facilities or public buildings ATMs 	
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
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](#)
- [Gambling Commission – Levels of Problem Gambling in England](#)
- [Gambling Commission – Taking a more in-depth look at Online Gambling](#)
- [Gambling Commission – Industry Statistics, February 2024](#)
- [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](#)

- [Tackling gambling related harm: A whole council approach | Local Government Association](#)

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Appendix A

The following statistics have been sourced from the Gambling Commission [report](#) participation in gambling and rates of problem gambling across England in 2021, the Statistics on gambling participation – Year 1 (2023) [report](#), and the Health Survey for England, 2021 [report](#):

Participation in gambling activities

- Overall, 48 per cent of the adult population (aged 16 and over) spent money on some form of gambling over the course of a year. This equates to around 20.3 million adults in the UK. Applied to the estimated adult population of West Suffolk (149,000, Census, 2021) this would amount to around 71,904 people in the authority.
- The most popular gambling activity is the National Lottery. In 2023, 31 per cent of adults who gambled had bought tickets for the National Lottery Draw.
- After the national lottery, the next most popular gambling activities are other charity lottery draws (16 per cent), scratch cards (13 per cent), horserace betting (12 per cent), casino games (3 per cent) and sports betting (3 per cent).

Profile of participants in gambling activity

- Men are more likely than women to gamble overall (53 per cent for men and 43 per cent for women).
- Gambling participation is associated with age – participation was lowest among the youngest groups.
- According to the 2021 report, gambling prevalence is highest among those who are:
 - either married or had been married (75 per cent)
 - white or white British (76 per cent)
 - those whose highest qualification was GCSE's or equivalent (76 per cent)
 - those in lower supervisory/technical households (79 per cent)
 - those in paid work (78 per cent)
 - those with the highest personal income.

Other key facts

As of 2021:

- 10 per cent of adults had participated in any online gambling (excluding National Lottery and other lotteries) in the last 12 months.
- According to their Problem Gambling Severity Index (PGSI) scores, 2.8 per cent of adults were identified as engaging in at-risk or problem gambling and 0.3 per cent as engaging in problem gambling.
- Men were more likely to be identified as engaging in at-risk or problem gambling than women (4.4 per cent of men and 1.1 per cent of women).

- People who had gambled and spent money on four or more different gambling activities in the last 12 months were more likely to engage in at-risk or problem gambling (27.8 per cent) than those who gambled on two or three different activities (4.6 per cent) or only one activity (1.6 per cent).
- Among adults who had gambled in the last 12 months, their PGSI scores identified 5.8 per cent as engaging in at-risk or problem gambling compared with 18.2 per cent of those who had gambled online.

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 per cent compared to 3.12 per cent 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 per cent of the 16 to 18-year-old population in West Suffolk were not in education, employment or training (NEET), compared to 8.4 per cent in England (Labour Force Survey).
- 15.4 per cent of West Suffolk employees work in business and admin support services, 11.8 per cent worked in manufacturing, 11.8 per cent in health, 9.6 per cent in retail and 7.9 per cent 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 per cent 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).