

CARMARTHENSHIRE COUNTY COUNCIL



Gambling Policy CONSULTATION REPORT

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CARMARTHENSHIRE COUNTY COUNCIL

Gambling Policy CONSULTATION

INTRODUCTION & CONTEXT

On a periodic basis – at least once every three years – the local authority is legally required to review its Gambling Policy under the Gambling Act 2005 to ensure fitness for purpose. Consultation is an intrinsic part of this process: the policy must be responsive to local needs, it should take under advisement comments from myriad stakeholders and seek evidence that will help evaluate progress against its statutory objectives.

To this end, a ten week consultation (July 7th to September 13th 2015) was held to garner views from a wide range of organisations and individuals with an interest in licensing matters. The consultation was the first opportunity that local residents, businesses, existing licence holders and their representatives have had to formally comment on the Policy since 2012.

This report, incorporating the results of the public consultation and the authority's response in summary form, will go to both the Licensing Committee and Environmental & Public Protection Scrutiny Committee mid-November and then to the Executive Board for a decision before the month ends.

This report:

- 1) Outlines the approach and consultation methods deployed;
 - 2) Summarises results and key findings;
 - 3) Considers free-text responses from residents, licence holders, organisations and town and community councils in a summary matrix table;
 - 4) Provides a short summary
-

1) OUTLINE OF APPROACH AND CONSULTATION METHODS

A mixed-methods approach to ascertaining views on Carmarthenshire's Gambling Policy was employed to gather quantitative and qualitative data for analytical and evaluative purposes. Specifically, the consultation focused on identifying locations where gambling and gambling-related problems were perceived to be a serious issue.

In accordance with the Gambling Act 2005, a number of statutory consultees were engaged throughout the consultation. This included:

- the fire authority
- the police service
- the Gambling Commission
- Planning
- Environmental Health
- Child Protection

- HMRC

The gambling consultation was jointly publicised with the licensing policy. Awareness was raised through use of the following consultation channels:

Publicity

The consultation was publicised through the Council's press office, through means including: press releases; article in Carmarthenshire News; information on the Council's website; online consultation portal (hosted on iLocal) and through social media feeds.

Carmarthenshire Citizens' Panel & 50+ Forum

Carmarthenshire's Citizens' Panel (a representative group comprising c. 600 members) – and 50+ Forum (2400 members aged 50 plus) are a useful barometer of public opinion and are regularly consulted on Council services. Information was disseminated electronically to members on email: c. 230 Citizens' Panel and c. 550 50+ members.

Survey

Surveys are a cost-effective method for finding out stakeholders' views and can be administered in a variety of different ways. An electronic and paper survey was thus selected as the principal method for gathering data. The survey contained a number of fixed-response (closed) and free-response (open) questions. Furthermore, the survey encouraged respondents to upload/attach evidence to support their submission.

The on-line survey was made available through Carmarthenshire County Council's iLocal consultation portal. In addition to listed statutory consultees, links to the survey were circulated to members of the Citizens Panel, 50+ Forum, Equality Carmarthenshire and Youth Council; county councillors and town and community councils, licence holders, licensing solicitors, MPs, AMs and the Police and Crime Commissioner. Taken as a whole, consultation invites were sent to over 1900 individuals and organisations (excluding Carmarthenshire News recipients).

The consultation exercise resulted in **44 submissions**, covering a wide section of the community. Half of the responses received were from members of the public,¹ 14 (32%) from a body/person representing the public, 4 (9%) were a premises licence holder, 2 (5%) were club premises licence holders and 2 (5%) were other organisations/groups. A full breakdown is tabulated overleaf. Considering all responses, 24% of responses were received from premises/households in SA14, 18% in SA32, 15% in both SA15 and SA18, 12% in both SA17 and SA33 and 3% in both SA19 and SA34. No other postcode attracted a response.

¹ The demographic profile of respondents is as follows. Ethnicity: all respondents described themselves white. Age: 5% were under 25, 5% were 25-34; 27% were 35-44, 14% 45-54, 36% 55-64, 14% 65-74, (age cohorts with no responses are not listed). Gender: 50% female, 50% male. Disability: 5% yes, 86% no, 9% preferring not to say (PNTS). Religion or belief: 48% held a religion or belief, 48% did not and 5% PNTS. Sexual orientation: 91% heterosexual, with 9% PNTS.

Are you responding as a...	
Premises licence holder	4 (9%)
Personal licence holder	-
Club premises certificate holder	2 (5%)
Member of the Public	22 (50%)
Local business	-
Body representing licence holders / clubs	-
Body/ Person representing members of the Public (e.g. County councillors; Town & Community Council)	14 (32%)
Other Organisation or Group	2 (5%)

Proper weight has been given to the views of all those consulted and, in particular, 'due regard' given to free text (literal) responses.

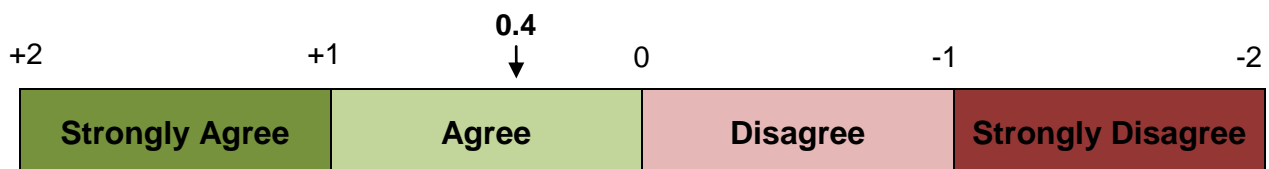
Other

Carmarthenshire's Licensing department also convened a meeting with Ceredigion and Pembrokeshire Councils and the Gambling Commission.

2) KEY QUANTITATIVE FINDINGS FROM THE SURVEY

The section will be structured by considering each quantitative survey question in turn. Mention will be made of the views of different categories of respondent, to enable comparisons to be made. This process is known as the disaggregation of survey data: examining trends by age, gender and other demographic variables to enrich the consultation. In section 3, comments from the consultation will be considered separately in a matrix table, whether these have arisen through survey submission, or letter or email submissions.

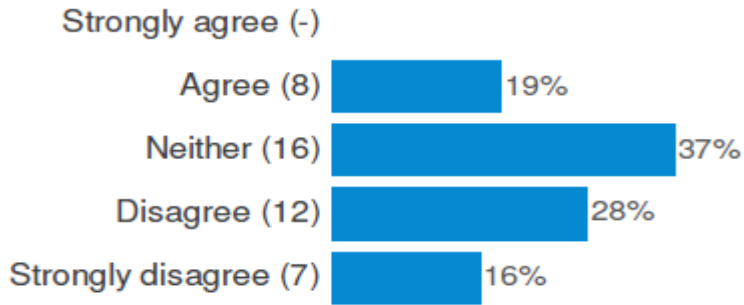
<p><i>About the Average Index Score (AIS)</i></p> <p>Sometimes known as a 'weighted average', the AIS is a way of distilling the 'balance and strength of opinion' down into one number. Useful for questions with options to 'strongly agree', 'disagree', etc., the technique is used throughout the report.</p> <p>Example</p> <p>10 people are asked whether they 'strongly agree', 'agree', 'have no opinion', 'disagree' or 'strongly disagree' that Wales will win the six nations.</p> <p>Results...</p> <p>3 strongly agree (each response worth 2, so=6) 3 agree (each response worth 1, so=3) 1 no opinion (each response worth 0, so=0) 1 disagree (each response worth -1, so=-1) 2 strongly disagree (each response worth -2, so=-4)</p> <p>The AIS is calculated by <u>adding</u> all the numbers in bold: So, $6+3+0-1-4=4$; <u>Then dividing</u> by the number of responses (10 in this case). The average index score is: $4 \div 10 = \mathbf{0.4}$</p>



Following a series of demographic profiling questions, respondents were asked to indicate the extent to which they agreed or disagreed with a series of statements about gambling – designed to elicit information on the prevalence of gambling-related problems across Carmarthenshire. A likert scale was used, with 'strongly agree' and 'strongly disagree' as response anchors.

Firstly, 42% of respondents disagreed (16% disagree; 28% strongly disagree) that there were **gambling-related problems in their area**. 'Neither' was the largest response category, attracting 37% of responses. This may suggest that respondents do not feel they have sufficient knowledge/information or local intelligence to make an informed judgment, thus preferring to remain neutral. Less than one fifth (19%) of respondents agreed with the statement. Of those who agreed gambling-related problems were an issue in their area, the following streets/towns were cited: Llanelli (x2 respondents); Carmarthen (x1); Ammanford (x1) and a belief that the problem is county wide (Carmarthenshire x1).

1. There are gambling-related problems in my area

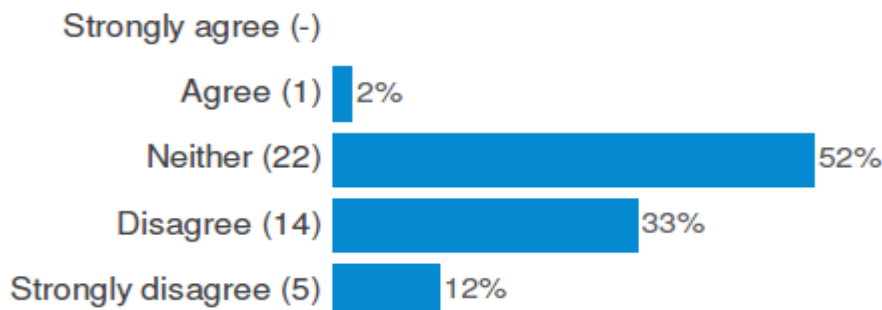


That the majority do not consider gambling-related problems to be an issue in their area is borne out by a negative Average Index Score (AIS) of **-0.42** (plotted below).

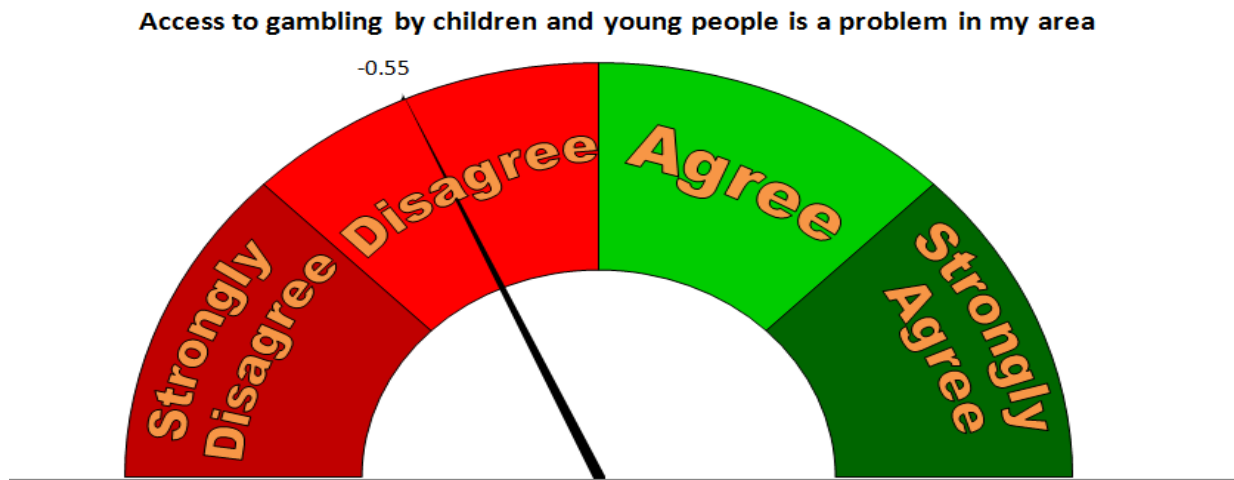


Next, 45% of respondents disagreed that **access to gambling by children and young people was a problem in their area**. As with the preceding question, 'neither' attracted the most responses (52%). Only one respondent (2%) agreed.

2. Access to gambling by children and young people is a problem in my area

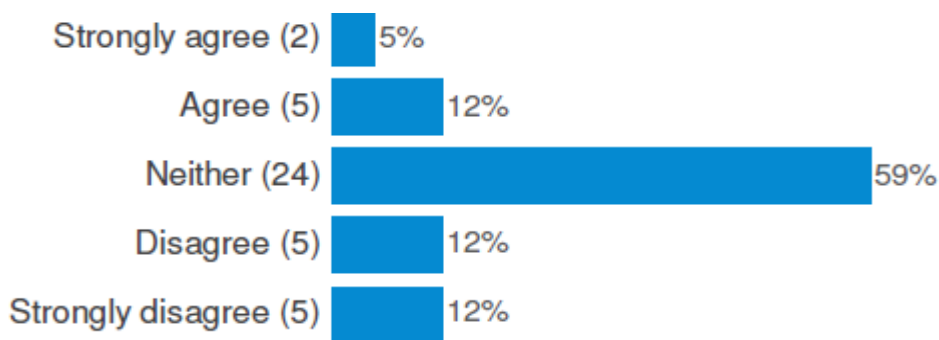


An Average Index Score of -0.55 confirms this result, with a score in the 0 – -1 range indicating disagreement.



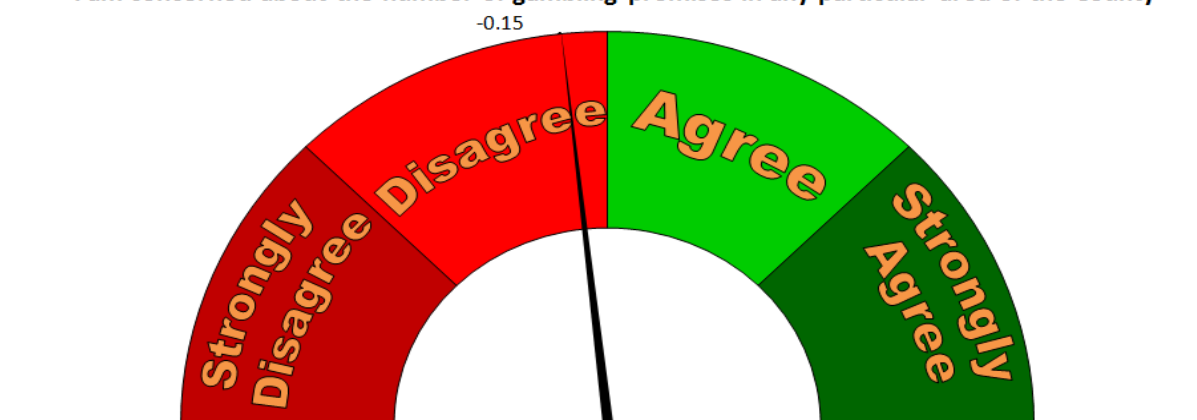
Lastly, around six in ten (59%) respondents neither agreed or disagreed that they were **concerned about the number of gambling premises in any particular area of the County**. Again, this suggests most respondents are neutral/undecided on the matter or have insufficient knowledge or experience to form strong feelings. Around a quarter (24%) disagreed (12% strongly disagree; 12% disagree), with 17% agreeing (5% strongly agree; 12% agree).

3. I am concerned about the number of gambling premises in any particular area of the County



An Average Index Score of -0.15 suggests, overall, slight disagreement. Values closer to a '0' value are indicative of a fairly neutral response.

I am concerned about the number of gambling premises in any particular area of the County



The AIS for selected demographic categories, and that of particular postcodes, has been tabulated below for each of the three statements.² The table draws upon a process known as 'exception reporting' to shade values that are critical; in this case positive values indicating agreement with the statements. Of particular note, the positive AIS for male respondents (0.09) denotes slight concern about the number of gambling premises in the County.

+2	+1	0	-1	-2
Strongly Agree	Agree	Disagree	Strongly Disagree	

	SA14	SA15	SA17	SA18	SA32	SA33	M	F
<i>There are gambling-related problems in my area</i>	-0.13	-0.8	-1	-0.6	-0.17	-0.5	0	-0.8
<i>Access to gambling by children and young people is a problem in my area</i>	-0.5	-1	-0.75	-0.8	-0.17	-0.33	-0.36	-0.8
<i>I am concerned about the number of gambling premises in any particular area of the County</i>	-0.13	-0.25	-0.5	-0.6	-0.2	-0.25	0.09	-0.27

Bringing the analysis of quantitative data to a close, 98% of respondents said they were not aware of any problems that have occurred as a result of gambling premises being located in close proximity to sensitive buildings such as schools, sixth form colleges and children's play areas. Similarly, 93% of respondents were unaware of any premises where problems have occurred as a result of gaming machines being made available to the public. Although a general comment was made about the proliferation of gaming machines, information on locality was not provided.

² Please note that in some instances, the sample sizes of each postcode are relatively small – distorting the results. Categories (postcodes, age, gender) which have received fewer than 4 responses are omitted from the table. . A map showing the postcode areas of Carmarthenshire is appended to this report (appendix 2).

3) ANALYSIS OF COMMENTS – SUMMARY MATRIX TABLE

The report now considers comments expressed in the survey’s free-text questions. Note is made of the respondents ID number (to provide a traceable record), comment(s) received, the Council’s response and, where appropriate, changes to the gambling policy as a result of the consultation. Respondents that have not submitted a reply are omitted from the table.

RESPONDENT	COMMENTS	APPRAISAL	RESPONSE	CHANGES
Respondent 1	Question 3 Concerned about the number of premises in Llanelli	Noted	To be taken into account when reviewing the policy	No Change
Respondent 3	Question 3 Gambling can lead to financial problems and physical abuse for the gambler’s family. Arcades are breeding grounds for future addicts. Care needed to balance establishments and limit numbers of machines.	Noted	To be taken into account when reviewing the policy	Change to Appendix A and new paragraph regarding Financial Exploitation Safeguarding Scheme (FESS).
Respondent 4	Question 3 Councillors should spend time reviewing this issue. Their job is to protect the vulnerable and they should send a clear message to gambling businesses that exploitation will not be tolerated	Noted	To be taken into account when reviewing the policy	Change to Appendix A and FESS.
Respondent 14	Question 3 Concerned about the number of gambling premises in Stepney	Noted	To be taken into account when reviewing the	FESS.

	Street/Station Road, Llanelli. Gambling encourages people to waste money		policy	
Respondent 17	Question 3 The main problem is the ease of access to online gambling and the high profile advertising	Noted. However the policy is unable to deal with issues of online gambling	No change required to policy	No Change
Respondent 22	Question 3 The introduction of online gambling has seen a dramatic increase in the numbers of people with a gambling problem. Gambling adverts on television should be banned.	Noted. However online gambling is not a matter that can be dealt with by the policy	No change required to the policy	FESS
Respondent 28	Question 3 Poverty due to an increase in gambling. Betting shop windows advertisements encourages betting. Should be forced to also say how often people win.	Noted	To be taken into account when reviewing the policy	FESS
Respondent 34	Question 3 Evidence of a link between problem gambling and vulnerability to financial exploitation. Gambling premises should promote the Financial Exploitation Safeguarding Scheme (FESS) as a means of protecting the vulnerable from problem gambling	Noted	To be taken into account when reviewing the policy	FESS

Respondent 35	Question 1 Gambling related problems in Llanelli. Increase in number of betting shops in Llanelli a concern. Should limit the number of betting shops in socially deprived areas of the town.	Noted	To be taken into account when reviewing the policy	Cannot limit numbers.
Respondent 37	Question 3 Some bookmakers have so many Gambling machines that they look more like arcades	Noted	To be taken into account when reviewing the policy	No Change as dealt with by legislation and guidance.
Respondent 44	Question 3 Detailed representations submitted on the following points; <ol style="list-style-type: none"> 1. Generally supports current policy 2. Would be happy to provide risk assessments should the policy be amended to require this 3. Such assessments should assess specific local risks and the control measures to address them. 4. No evidence of betting shops close to places frequented by children actually causing harm 	Noted	To be taken into account when reviewing the policy	Risk assessment paragraph.

4) SUMMARY – KEY CHANGES TO THE GAMBLING POLICY

1. Updated demography and plan of County inserted
2. Glossary of terms inserted
3. Details of Responsible Authorities revised and updated
4. Guidance to applicants inserted on matters to consider when preparing applications
5. Updated advice inserted on the protection of children and vulnerable persons from gambling harm, including reference to the Financial Exploitation Safeguarding Scheme.
6. Inserted new section on Risk Assessments.
7. Scheme of Delegation amended to give elected members a greater role in determining gaming machine permit applications.

Gambling Act 2005 - Review of Gambling Policy

Part 1 - About You

- 1 Are you responding as a...
- Premises licence holder
 - Personal licence holder
 - Club premises certificate holder
 - Member of the Public
 - Local business
 - Body representing licence holders / clubs
 - Body/ Person representing members of the Public (e.g. County councillors; Town & Community Council)
 - Other Organisation or Group

- 2 If responding as an organisation/business/body, please write its name here
-

- 3 Following 'SA', please specify the two numbers of your postcode
-

- 4 What is your age group?
- | | |
|-----------------------------------|----------------------------------|
| <input type="checkbox"/> Under 16 | <input type="checkbox"/> 55 - 64 |
| <input type="checkbox"/> 16 - 24 | <input type="checkbox"/> 65 - 74 |
| <input type="checkbox"/> 25 - 34 | <input type="checkbox"/> 75 - 84 |
| <input type="checkbox"/> 35 - 44 | <input type="checkbox"/> 85+ |
| <input type="checkbox"/> 45 - 54 | |

- 5 What is your gender?
- | | | |
|---------------------------------|-------------------------------|--|
| <input type="checkbox"/> Female | <input type="checkbox"/> Male | <input type="checkbox"/> Prefer not to say |
|---------------------------------|-------------------------------|--|

- 6 What is your ethnic group?
- | | |
|---|--|
| <input type="checkbox"/> White | <input type="checkbox"/> Black / African / Caribbean / Black British |
| <input type="checkbox"/> Mixed / multiple ethnic groups | <input type="checkbox"/> Other ethnic group |
| <input type="checkbox"/> Asian / Asian British | <input type="checkbox"/> Prefer not to say |

- 7 The Equality Act 2010 states that a person has a disability for the purposes of this Act if he/she has or has had '*a physical or mental impairment which has had a substantial and long term adverse effect on his/her ability to carry out normal day to day activities*'.

Long term has been defined as meaning having lasted 12 months or is likely to last at least 12 months

- Do you consider yourself to be disabled?
- | | | |
|------------------------------|-----------------------------|--|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Prefer not to say |
|------------------------------|-----------------------------|--|

- 8 Do you hold a religion or belief?
- | | | |
|------------------------------|-----------------------------|--|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Prefer not to say |
|------------------------------|-----------------------------|--|

9 What is your sexual orientation?

- Heterosexual
- Bisexual
- Lesbian
- Gay
- Prefer not to say

Part 2

To what extent would you agree or disagree with the following statements:

1. There are gambling related problems in my area

- Strongly agree Agree Neither Disagree Strongly disagree

If you would like to provide specific information on any of these issues, such as past or ongoing problems, please do so below:

Street

Town / Village

Nature of problem

2. Access to gambling by children and young people is a problem in my area

- Strongly agree Agree Neither Disagree Strongly disagree

If you would like to provide specific information on any of these issues, such as past or ongoing problems, please do so below:

Street

Town / Village

Nature of problem

3. I am concerned about the number of gambling premises in any particular area of the County

- Strongly agree Agree Neither Disagree Strongly disagree

If you would like to provide specific information on any of these issues, such as past or ongoing problems, please do so below:

Street

Town / Village

Nature of problem

Are you aware of any problems that have occurred as a result of gambling premises being located in close proximity to sensitive buildings e.g. schools, sixth form colleges, children's play areas etc?

- Yes
 No

If you would like to provide specific information on any of these issues, such as past or ongoing problems, please do so below:

Street

Town / Village

Nature of problem

Are you aware of any premises where problems have occurred as a result of gaming machines being made available to the public?

- Yes
 No

If you would like to provide specific information on any of these issues, such as past or ongoing problems, please do so below:

Street

Town / Village

Nature of problem

Is there anything else that you want us to take into account when reviewing the Gambling Policy?

If you would like to attach a document to your survey response, please note below

Part 3 - Your Details (optional)

Name:

Address:

Tel No:

Fax:

E-mail:

Under certain circumstances, we may wish to contact you to follow-up on your response, either to ask for additional comment or to reply to the points you have raised.

Do you consent to CCC using your details in this way?

- Yes - I am happy to be contacted
 No - I do not wish to be contacted

Data Protection Act 1998

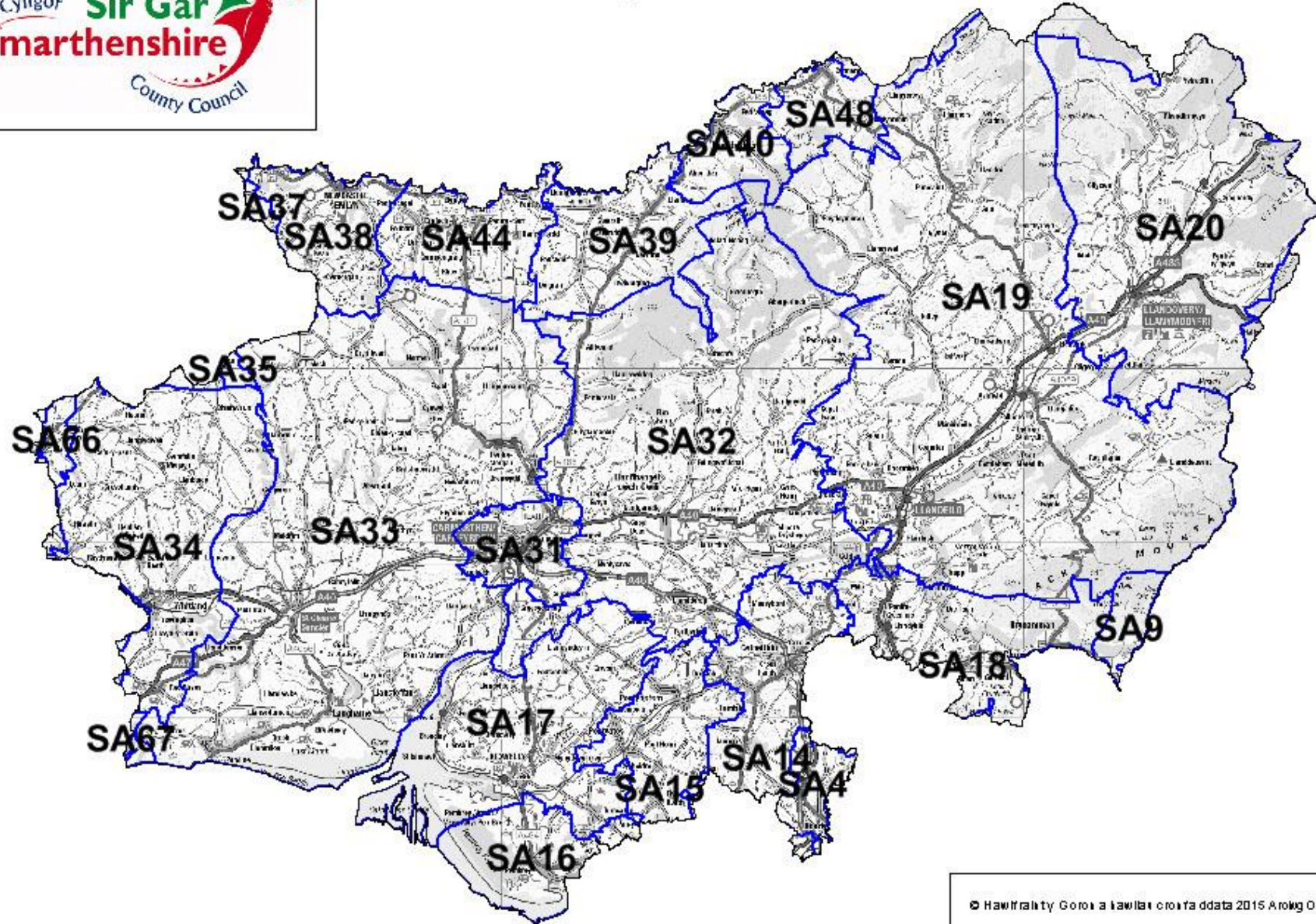
The information contained in this form will be held and processed by Carmarthenshire County Council in accordance with the Data Protection Act 1998.

Your personal details will not be made public in any Council report.

Thank you for your response



APPENDIX 2 - Map of Carmarthenshire Postcode Districts



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