

Review of Gambling Policy

Consultation Report

2021

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Cyngor **Sir Gâr**
Carmarthenshire
County Council



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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 five week consultation (25th October to 21st November 2021) 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 2018.

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 the Executive Board in February 2022 before going to full Council in March 2022.

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 Police
- the fire authority
- 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; information on the Council's website; online consultation portal and through social media feeds.

Survey

Surveys are a cost-effective method for finding out stakeholders' views and can be administered in a variety of different ways. An electronic 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 website. In addition to listed statutory consultees, links to the survey were circulated to members of the aging well forum, county councillors and town and community councils, gambling licence holders, licensing solicitors, MPs, AMs and the Police and Crime Commissioner. Taken as a whole, consultation invites were sent to over 1000 individuals and organisations.

The consultation exercise resulted in **72 submissions**, covering a wide section of the community. The table presented below provides a breakdown of the composition of respondents. Some have responded in a number of capacities, therefore the table presented below contains 86 responses.

Are you responding as a... (Multiple choice question)		
Member of the Public	26	37%
Premises licence holder	15	21%
Other	11	16%
Personal licence holder	9	13%
Gambling premises licence holder	5	7%
Gambling permit holder	5	7%
Club premises certificate holder	5	7%
Body representing licence holders / clubs	5	7%
Local business	4	6%
Body/ Person representing members of the Public (e.g. County councillors; Town & Community Council)	1	1%

The table below presents the areas respondents resided in. Respondents were asked to enter the first two digits of their postcode following SA. The following table presents the postcodes entered. No other postcode attracted a response.

Postcode*	Number of responses (/47)
SA14	6
SA15	11
SA16	2
SA17	1
SA18	5
SA20	1
SA31	10
SA32	3
SA33	3
SA34	5

*Note Postcode areas seen in Appendix B.

Other

Carmarthenshire's Licensing Section convened a meeting with representatives of Ceredigion, Pembrokeshire and Powys Council licensing sections as well as the Gambling Commission to discuss revisions to Gambling Policies and to adopt a consistent approach where possible.

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 (i.e. Postcode area and nature of respondent), to enable comparisons to be made. 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.

*About the **Average Index Score (AIS)***

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.

Example

10 people are asked whether they 'strongly agree', 'agree', 'have no opinion', 'disagree' or 'strongly disagree' that Wales will win the six nations.

Results...

3 strongly agree (each response worth 2, so=**6**)

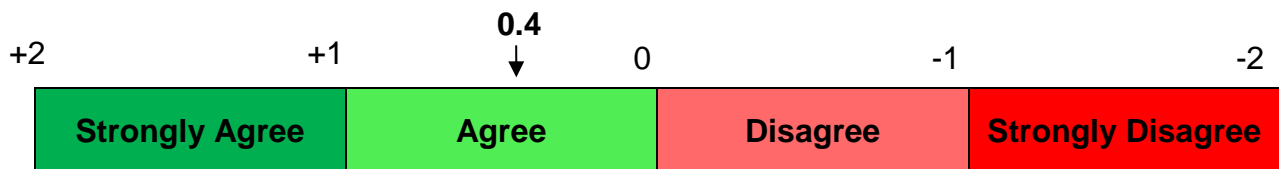
3 agree (each response worth 1, so=**3**)

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**)

The AIS is calculated by adding all the numbers in bold: So, $6+3+0-1-4=4$; Then dividing by the number of responses (10 in this case). The average index score is: $4 \div 10 = \mathbf{0.4}$

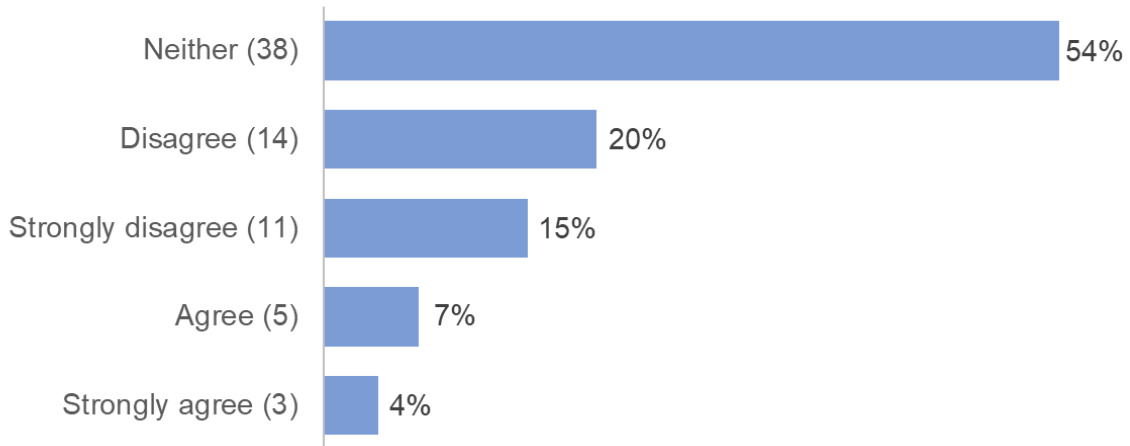


Respondents were asked to indicate the extent to which they agreed or disagreed with a series of statements about gambling – designed to produce information on the gambling-related problems across Carmarthenshire. A likert scale was used, with 'strongly agree' and 'strongly disagree' as response anchors.

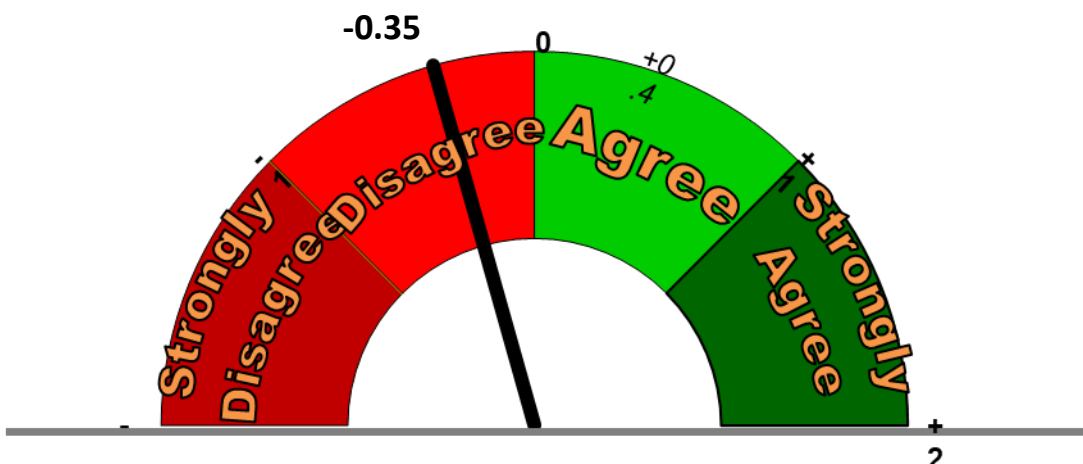
1. There are gambling related problems in my area.

Firstly, 36% of respondents disagreed (20% disagree; 16% strongly disagree) that there were **gambling-related problems in their area**. 54% of respondents reported that they 'Neither' disagreed nor agreed with this statement. 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. It was seen that only 11% of respondents agreed with the statement with 4% of these participants strongly agreeing.

1. There are gambling related problems in my area.



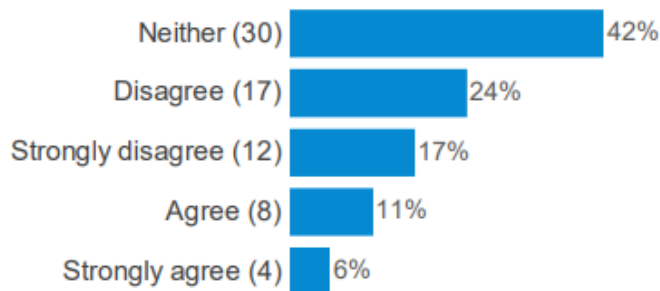
That the majority do not consider gambling-related problems to be an issue in their area is borne out by a negative Average Index Score (AIS) of **-0.35** (plotted below).



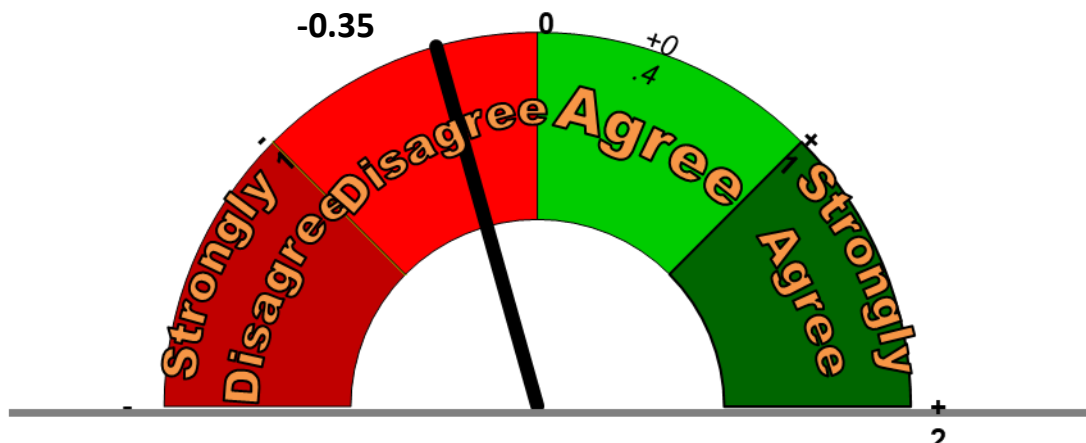
2. Access to gambling by children, young people and other vulnerable persons is a problem in my area

Next, 41% of respondents disagreed (24%) or strongly disagreed (17%) that **access to gambling by children and young people was a problem in their area**. Contrastingly, 11% agreed with this statement and 6% strongly agreed. The results can be seen in the table below. When examining the breakdown, it is clear that most individuals, organisations and businesses noted that access to gambling by children, young people and vulnerable persons is not a problem in their area.

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



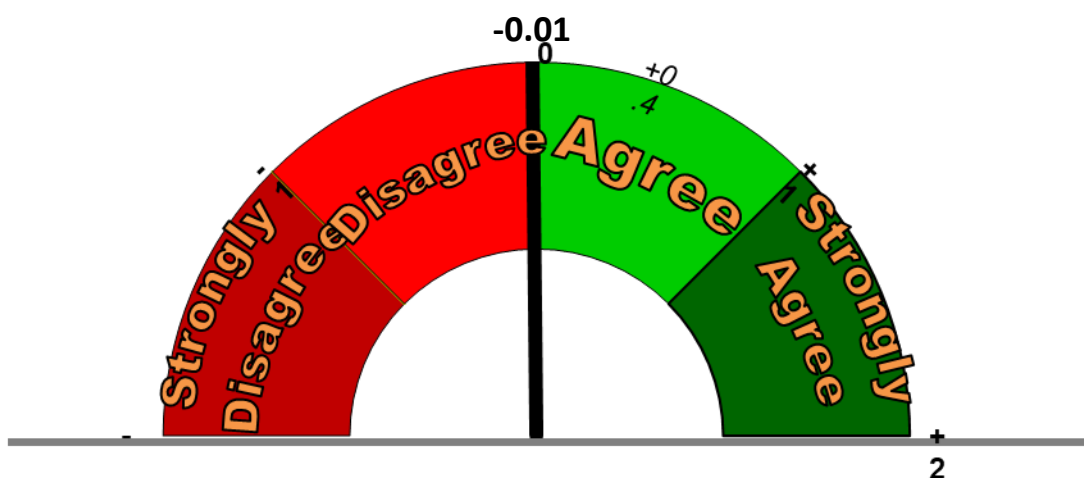
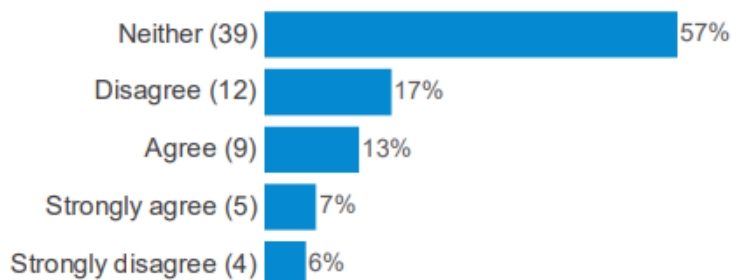
An Average Index Score of -0.35 confirms this result, with a score in the 0 – -1 range indicating disagreement.



3. I am aware of where to get advice or support locally/nationally for gambling related problems.

It was seen that 57% (N=9) respondents neither agreed nor disagreed that they were **aware of where to get advice or support locally / nationally for gambling related problems**. Again, this suggests most respondents are neutral/undecided on the matter or have insufficient knowledge or experience to form strong feelings. Additionally, 20% of respondents agree (Strongly agreed 7%; agreed 13%) with this statement. Moreover it was seen that 23% participants disagreed (6% strongly disagree; 17% disagree).

3. I am aware of where to get advice or support locally / nationally for gambling related problems.



An Average Index Score of -0.01 suggests, overall, respondents neither agreed or disagreed with the statement. Values closer to a '0' value are indicative of a fairly neutral response.

4, 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, treatment centres for drug, alcohol and other addictions?

The graph below shows that the majority of respondents (n=69; 97%) are unaware of any problems which have occurred as a result of gambling premises being located in close proximity to sensitive buildings. Only two people responded that they were aware of problems which have occurred.

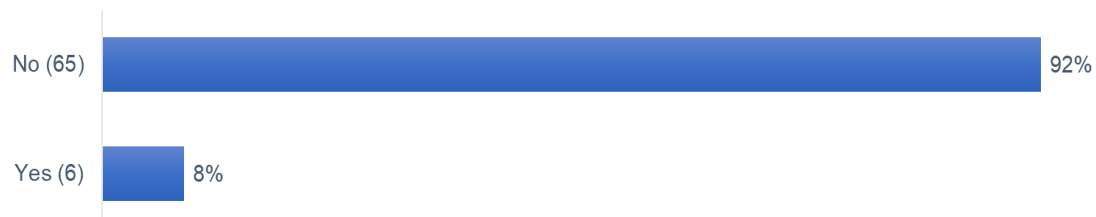
4. Are you aware of any problems that have occurred as a result of gambling premises being located in close proximity to sensitive buildings e.g. schools, sixth form colleges, children’s play areas, treatment centres for drug, alcohol and other addictions?



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

Similar to the preceding question, 92% (N=65) were unaware of any premises in their area where problems have occurred as a result of gaming machines being made available to the public. In contrast only 9% (N=6) noted that they have experiences problems due to gaming machines being made available to the public.

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



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 11	<p>Question 6</p> <p>I think it's important to recognise establishments that are well run and which keep a close eye on any gambling activities, ensuring that children do not have access to gaming machines. We consider ourselves to be such an establishment, as we do not rely on gambling as our main source of revenue. For this club, it is a sideline because our members want to play bingo and some of them also enjoy our various gaming machines. We tend to have an older clientele who would not otherwise be able to enjoy the social aspect of a game of bingo in a friendly, small scale environment. We strongly believe that a club like our should not be penalised simply because other forms of gambling cause problems.</p>	Noted	No Change required to policy	No Change

Respondent 29	<p>Question 6</p> <p>Monitoring adverts online and aimed at young adults and children</p>	Noted	No change required to policy	No power to control advertising online. Online gambling controlled by the Gambling Commission.
Respondent 38	<p>Question 1</p> <p>The are about the same number of betting shops in the town centre as public houses. The hours of opening are quite late and there is often parking issues in Caersalem terrace due to people placing bets late in the evening.</p> <p>Question 6</p> <p>The number of "gambling" outlets needs to be reduced, similarly the number of street side advertising. Llanelli has significant social issues and reducing the presence may prevent a recovering gambling addict being tempted back</p>	<p>Noted</p> <p>Noted</p>	<p>No change required to policy</p> <p>No change required to policy</p>	<p>Cannot limit number of premises.</p> <p>Cannot limit number of premises.</p>

Respondent 43	Question 6 Keep your noses out of peoples lives. Got nothing to do with you	Noted	No change required to policy	No Change
Respondent 51	Question 3 Online ability through phones	Noted.	No change required to policy	No power to control advertising online. Online gambling controlled by the Gambling Commission.
Respondent 54	Question 6 More accessible places for people to get support for gambling addiction. I am 24 yrs old, and have friends who gamble - they never go into any betting shops, all online/on app. Need to have more accessible and local places for them to get support.	Noted.	No change required to policy	No power to control advertising online. Online gambling controlled by the Gambling Commission.
Respondent 58	Question 3 This is an online problem and not specific to the locality. Nor is it anything that one can hold the Local Authority responsible for.	Noted	No change required to policy	No Change

	As with so many issues this is an question of balance. It must be considered that Gambling does provide much needed income for the country as well as providing an element of fun when handled correctly, an element of life that has been sorely lacking in recent years. However, there is no question that the ease of access to gambling does create problems although I believe that this is mainly due to online presence and apps rather than anything the Council has much control over.			
Respondent 66	<p>Question 1 Lots of betting shops</p> <p>Question 2 Some pubs etc have fruit machines in communal areas that aren't monitored such as entrance halls - children could access these without being stopped</p>	<p>Noted</p> <p>Noted</p>	<p>No change required to policy</p> <p>The Policy document has been amended to include further strong advice regarding the supervision of gaming machines</p>	<p>Cannot limit number of premises.</p> <p>Paragraphs have been added to sections 21 and 23 of the Gambling Policy advising operators of the need to improve staff training and the supervision of gaming machines.</p>
Respondent 67	<p>Question 2 I am a Trading Standards Officer in Carmarthenshire and undertook a an under age test purchasing survey in Oct 2019. In total, 17 premises from</p>	Noted	The Policy document has been amended to reflect the findings of the test purchasing exercise undertaken at licensed	Paragraphs have been added to sections 21 and 23 of the Gambling Policy advising operators of the need

	across the county were visited with a 100% failure rate, with no challenge made of the young volunteers.		Premises in 2019 and includes a statement strongly advising operators to improve staff training and the supervision of gaming machines to protect children from harm through gambling.	to improve staff training and the supervision of gaming machines.
Respondent 68	<p>Question 1</p> <p>lots of betting shops in small area</p> <p>Question 2</p> <p>lots of fruit machine in some places not supervised - could be an issue</p> <p>Question 4</p> <p>station road as an example - drug rehab place & 'half way house' in old Vista Lounge - within stones throw of several 'bookies'!</p> <p>Question 6</p> <p>encourage schools to do a session on the dangers of gambling? they concentrate on drugs, smoking etc but maybe gambling should be included</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No change required to policy</p> <p>The Policy document has been amended to include further strong advice regarding the supervision of gaming machines</p> <p>No change required to policy</p> <p>No change required to policy</p>	<p>Cannot limit number of premises.</p> <p>Paragraphs have been added to sections 21 and 23 of the Gambling Policy advising operators of the need to improve staff training and the supervision of gaming machines.</p> <p>Each application considered on their individual merits.</p> <p>Not within the scope of the Gambling Policy</p>

Respondent 70	<p>Question 6</p> <p>While physical gambling premises can be regulated locally the real issue is with the online gambling companies. While Carmarthenshire County Council can't influence policy making in regard to these establishments regrettably this is where the root of the problem lies and more actions in the form of advertising restrictions and controls are needed as well as spending caps.</p>	Noted	No change required to policy	Not within the scope of the Gambling Policy
Respondent 71	<p>Question 6</p> <p>The licensing authority undertook an underage test purchase exercise in October 2019, looking at access to gaming machines in licensed premises by persons under the age of 18. All 17 premises tested failed the exercise and were required to review and improve their staff training and supervision of Gaming Machines at the premises.</p>	Noted	The Policy document has been amended to reflect the findings of the test purchasing exercise undertaken at licensed Premises in 2019 and includes a statement strongly advising operators to improve staff training and the supervision of gaming machines to protect children from harm through gambling.	Paragraphs have been added to sections 21 and 23 of the Gambling Policy advising operators of the need to improve staff training and the supervision of gaming machines.

Respondent 72	<p>Question 2</p> <p>The issue I have found is that we need to improve the supervision of Gaming Machines located within premises. Once these machines have been installed, the supervision especially towards young people is poor. The age verification systems can only be described as poor</p>	Noted	<p>The Policy document has been amended to reflect the findings of the test purchasing exercise undertaken at licensed Premises in 2019 and includes a statement strongly advising operators to improve staff training and the supervision of gaming machines to protect children from harm through gambling.</p>	<p>Paragraphs have been added to sections 21 and 23 of the Gambling Policy advising operators of the need to improve staff training and the supervision of gaming machines.</p>
	<p>Question 6</p> <p>As I have previously alluded to, I am aware of test purchases being conducted within Carmarthenshire during 2019. I was very disappointed at the results and the failure rates whereby such a high proportion of children were allowed access to Gaming Machines at various premises without any form of challenge regarding their ages. It was quite apparent that there was simply very little supervision of the gaming machines at the premises. Whilst there was and is no evidence of a gambling problem in the area, these premises</p>	Noted	As above	As above

	<p>need to vastly improve their supervision and challenging mechanisms. My Organisation together with the Licensing Department need to work closely with Licensed Premises which have Gaming Machines in order to improve the age verification process. this can be done through visits, campaigns, education etc. in order to improve the situation.</p>			
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4) SUMMARY – KEY CHANGES TO THE GAMBLING POLICY

1. New paragraph inserted into section 21 (Licensed Premises Gaming Machine Permits) strongly advising licensees to improve staff training a supervision of gaming machines.
2. New paragraph inserted into section 23 (Club Gaming and Club Machine Permits) strongly advising members clubs to review and improve staff training and the supervision of gaming machines.



Gambling Act 2005 - Review of Gambling Policy Consultation Document 2018

Part 1 - About You

Are you responding as a...

Gambling premises licence holder

Gambling permit holder

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 councilors; Town & Community Council)

Other Organisation or Group

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

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

4	20	39
9	31	40
14	32	44
15	33	48
16	34	66
17	35	67
18	37	out of county
19	38	

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, young people and other vulnerable persons 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 aware of where to get advice or support locally / nationally for gambling related problems.

Strongly agree

Agree

Neither

Disagree

Strongly disagree

If you agree, please give details of the services that you are aware of below

Street

Town / Village

Nature of problem

4. 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, treatment centres for drug, alcohol and other addictions?

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

5. 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

6. 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 do so:

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
contacted

No - I do not wish to be
contacted

How we will use your information

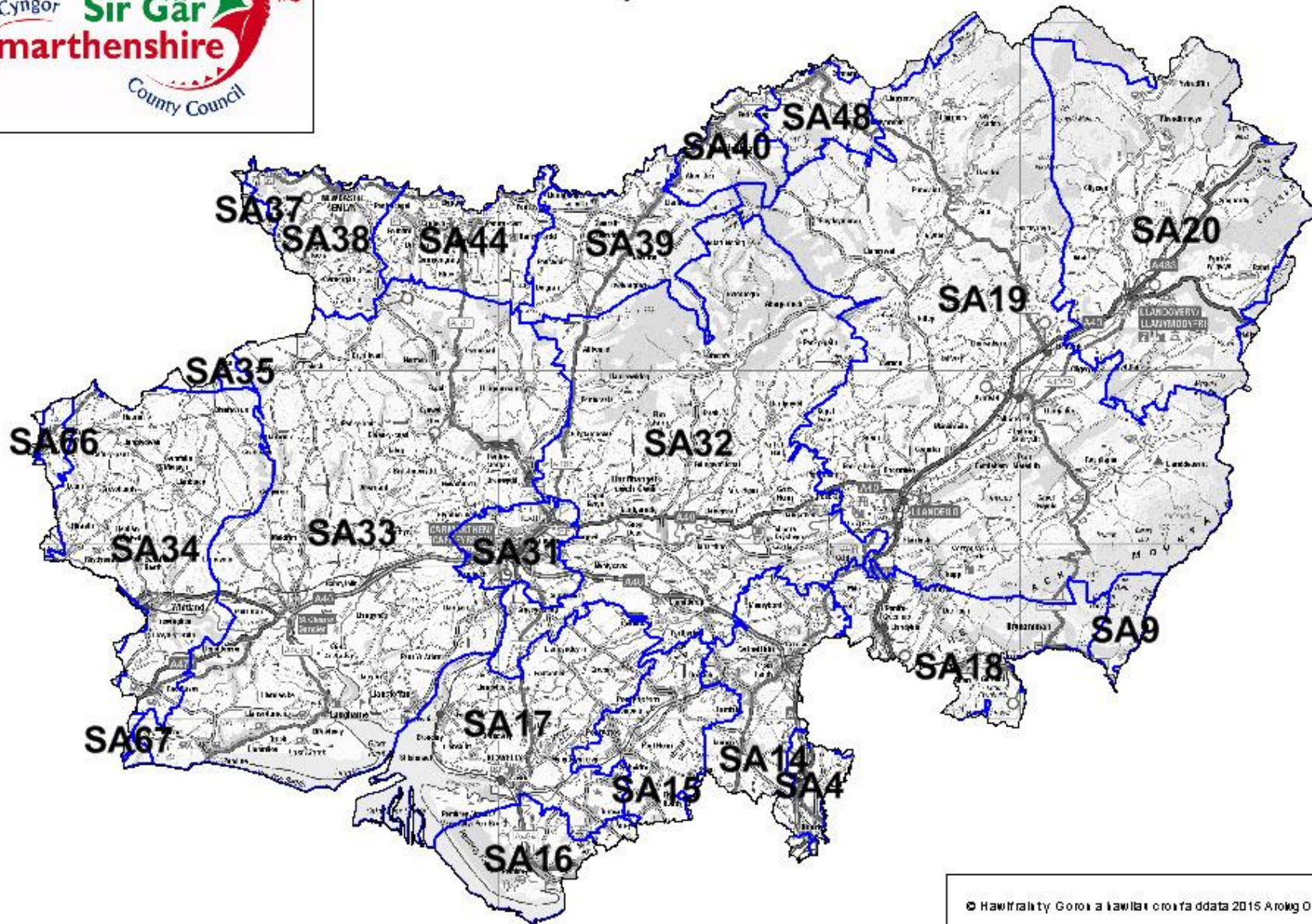
We are collecting personal data about you on this form to comply with requirements in the Gambling Act 2005 on carrying out consultations.

This personal data will only be used for the purpose of this consultation exercise by the Licensing team and will not be shared with any other Council service or external organisation. When we publish a report on this consultation this will not contain your personal details.

To find out more about how we will use your information, including your Data Protection rights, please contact the Licensing Section on 01267 228717.



APPENDIX 2 - Map of Carmarthenshire Postcode Districts



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