

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 (3rd April to 1st June 2018) 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 2015.

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 in October and then to the Executive Board in November before going to full Council in December.

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

Carmarthenshire Citizens' Panel & 50+ Forum

Carmarthenshire's Citizens' Panel (a representative group comprising c. 557 members) – and 50+ Forum (2700 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. 281 Citizens' Panel and c. 759 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 website (Seen in appendix A). In addition to listed statutory consultees, links to the survey were circulated to members of the Citizens Panel, 50+ 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 **23 submissions**, covering a wide section of the community. The table presented below provides a breakdown of the composition of respondents. Some have responded on a number of capacities, therefore the table presented below contains 28 responses.

Are you responding as a... (Multiple choice question)	
Gambling premises licence holder	2 (9%)
Gambling permit holder	2 (9%)
Premises licence holder	3 (13%)
Personal licence holder	-
Club premises certificate holder	7 (30%)
Member of the Public	6 (26%)
Local business	1 (4%)
Body representing licence holders / clubs	1 (4%)
Body/ Person representing members of the Public (e.g. County councillors; Town & Community Council)	4 (17%)
Other Organisation or Group	2 (9%)

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
SA14	3 (23%)
SA15	2 (15%)
SA16	1 (8%)
SA17	1 (8%)
SA18	4 (30%)
SA20	1 (8%)
SA34	1 (8%)

*Note Postcode areas seen in Appendix B.

Other

Carmarthenshire's Licensing Section has convened a number of meetings 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**)

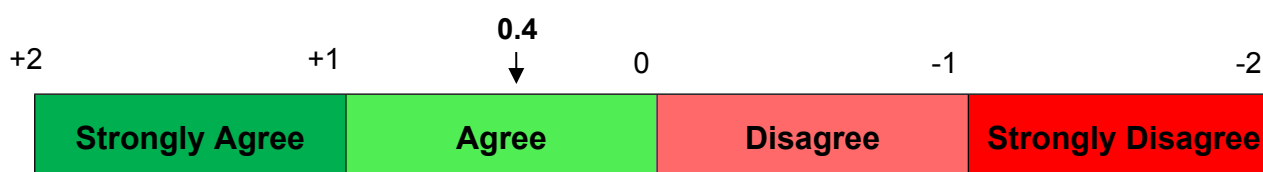
3 agree (each response worth 1, so=**3**)

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**)

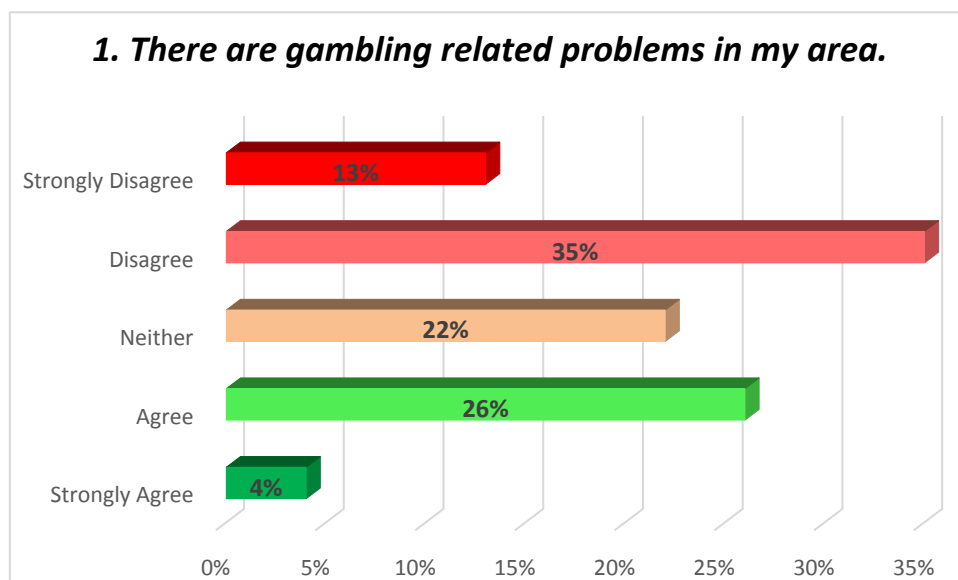
The AIS is calculated by adding all the numbers in bold: So, $6+3+0-1-4=4$; Then dividing by the number of responses (10 in this case). The average index score is: $4 \div 10 = \mathbf{0.4}$



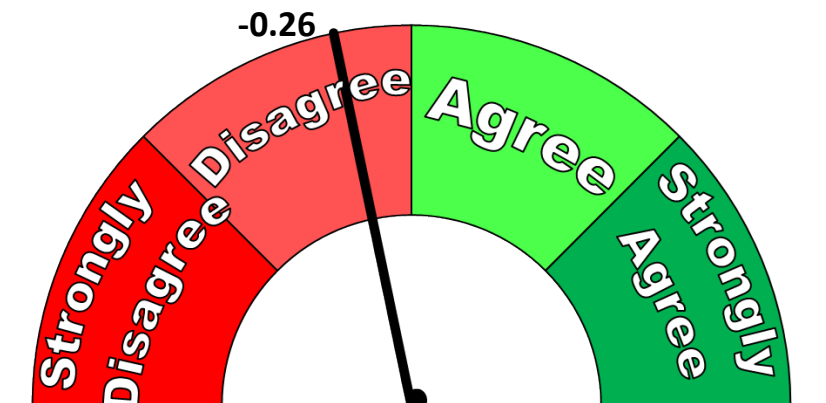
Respondents were asked to indicate the extent to which they agreed or disagreed with a series of statements about gambling – designed to produce information on the gambling-related problems across Carmarthenshire. A likert scale was used, with 'strongly agree' and 'strongly disagree' as response anchors.

1. There are gambling related problems in my area.

Firstly, 48% of respondents disagreed (35% disagree; 13% strongly disagree) that there were **gambling-related problems in their area**. 22% 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 over a quarter (30%) of respondents agreed with the statement with 4% of these participants strongly agreeing. Of those who agreed gambling-related problems were an issue in their area, the following postcodes were cited: SA14 (x1 respondents); SA18 (x1) and SA34 (x1).

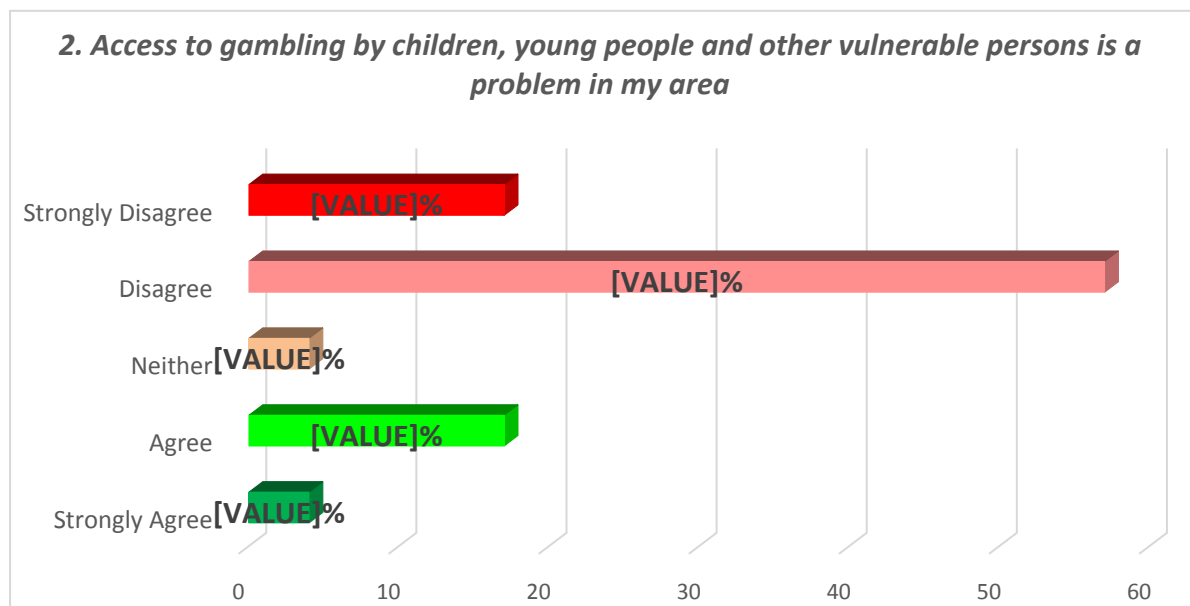


That the majority do not consider gambling-related problems to be an issue in their area is borne out by a negative Average Index Score (AIS) of **-0.26** (plotted below).

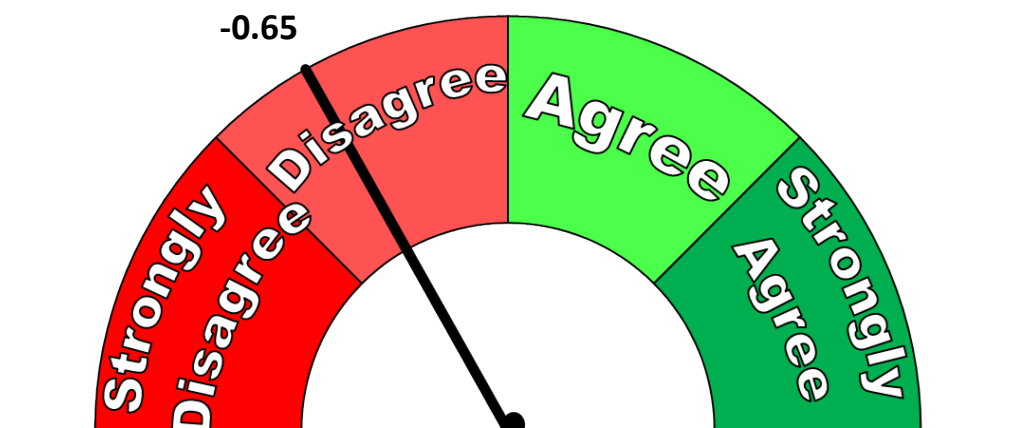


2. Access to gambling by children, young people and other vulnerable persons is a problem in my area

Next, 74% of respondents disagreed (57%) or strongly disagreed (17%) that **access to gambling by children and young people was a problem in their area**. Contrastingly, 17% agreed with this statement and 4% 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. Furthermore, when examining postcode areas, only one agreement was seen which derived from SA14 postcode.

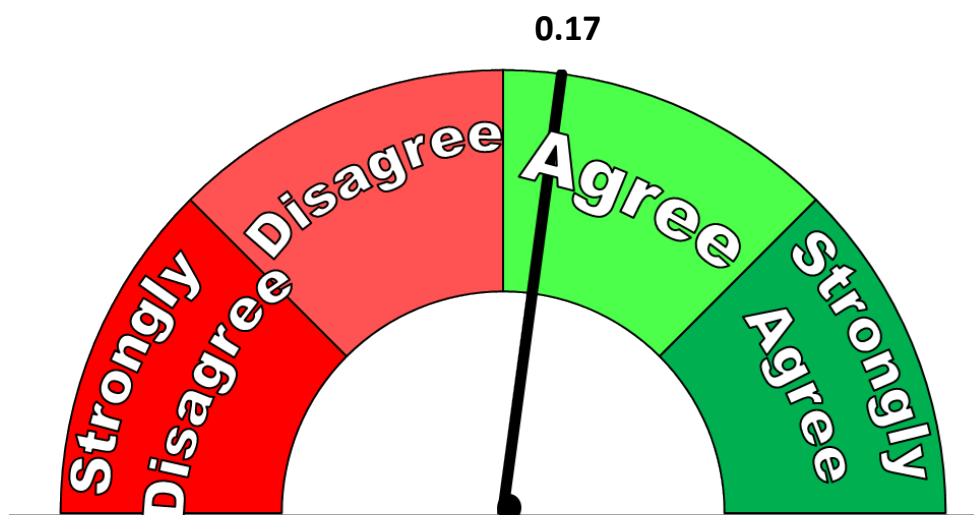
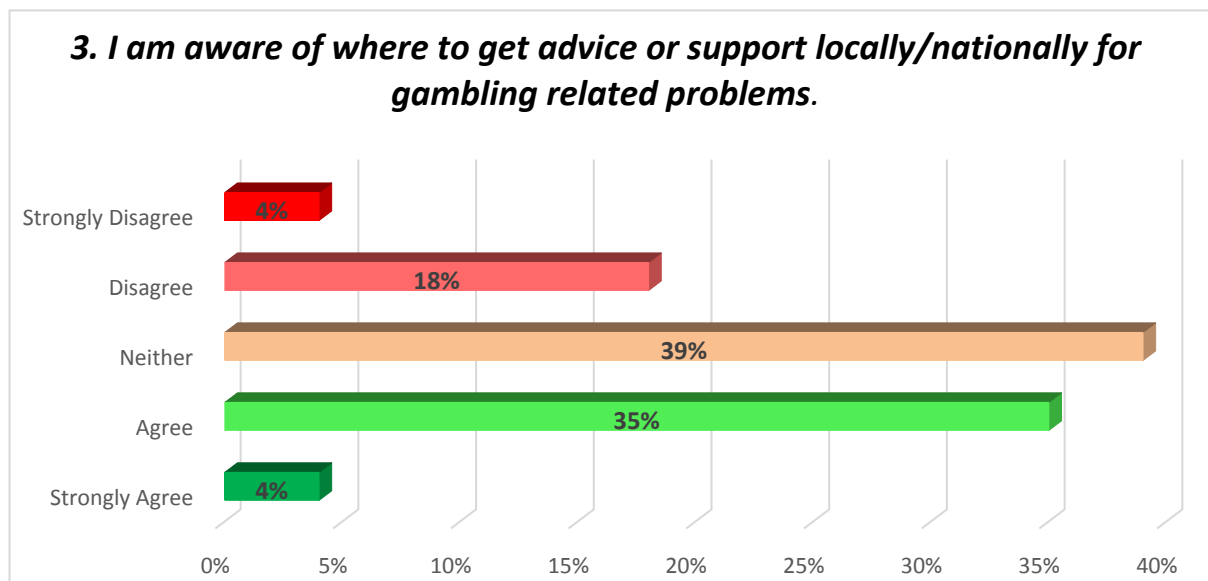


An Average Index Score of -0.65 confirms this result, with a score in the 0 – -1 range indicating disagreement.



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

It was seen that 39% (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. The same amount of respondents (39%) (Strongly agreed 4%; agreed 35%) with this statement. A significantly lower amount of participants disagreed (18% strongly disagree; 4% disagree).

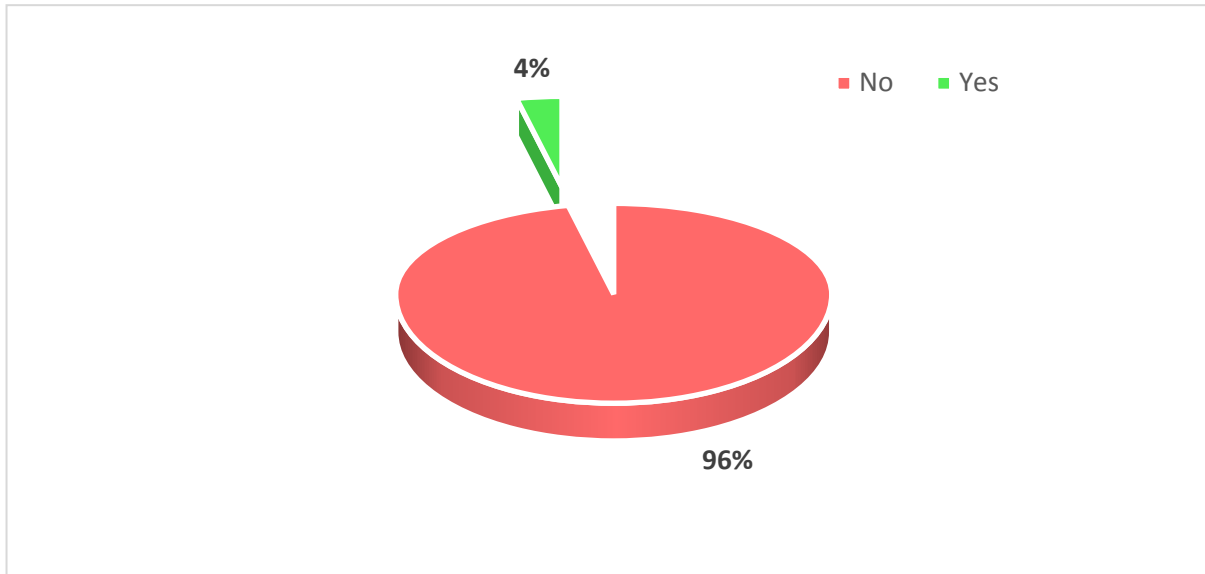


An Average Index Score of 0.17 suggests, overall, respondents slightly agreed with the statement. Values closer to a '0' value are indicative of a fairly neutral response.

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,

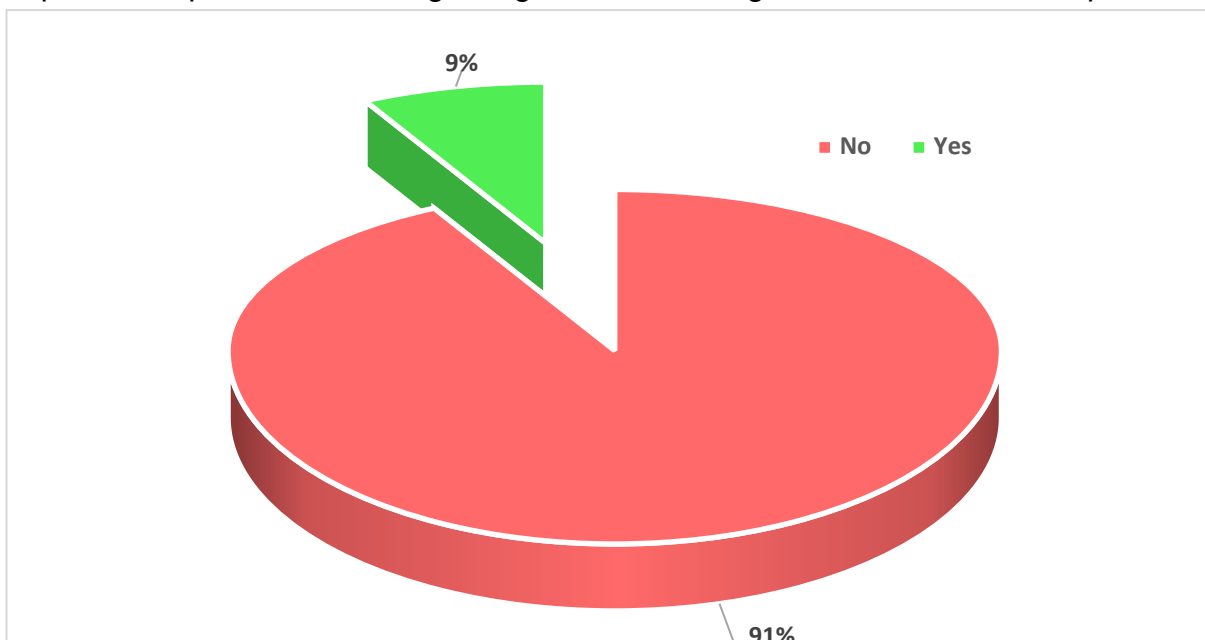
sixth form colleges, children's play areas, treatment centres for drug, alcohol and other addictions?

The pie chart below shows that the majority of respondents (n=22; 96%) are unaware of any problems which have occurred as a result of gambling premises being located in close proximity to sensitive buildings. Only one person responded that they were aware of problems which have occurred.



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, 91% (N=20) 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=2) noted that they have experienced problems due to 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 1	<p>Question 1,2 and 6 With Llanelli being that a deprived area Gambling can be a problem with it been seen as a way out of poverty etc</p>	Noted	To be taken into account when reviewing the policy	No Change necessary, already covered on page 12 of the Policy document under the heading of vulnerable persons.
Respondent 2	<p>Question 1 A load of residents mainly male using wages/benefits in bookmakers . Machines and then cards games in pub/club (Llwynhendy)</p> <p>Question 2 Machines in club/pub and bookmakers</p>	<p>Noted</p> <p>Noted</p>	<p>To be taken into account when reviewing the policy</p> <p>To be taken into account when reviewing the policy</p>	<p>No Change necessary, already covered on page 12 of the Policy document under the heading of vulnerable persons.</p> <p>No change necessary as above.</p>

	<p>Question 5 Children in club and machine was punched by a man who lost all his monies</p> <p>Question 6 Lower the amount. There are too many gambling premises and online gambling is worse as in my opinion people do not actually use the cash but cards and seems they are not in the reality of losing cash. Also continued emails texts and letters to people offering “free spins” 100% match bonuses etc.</p>	<p>Noted</p> <p>Noted</p>	<p>To be taken into account when reviewing the policy</p> <p>No change required to policy</p>	<p>Covered on page 12 of the policy document under the heading Children.</p> <p>No power to control the number of premises and online gambling controlled by the Gambling Commission.</p>
Respondent 6	<p>Question 1 Ready availability of gambling outlets in the town (Carmarthen)</p>	<p>Noted</p>	<p>No change required to policy</p>	<p>Cannot limit number of premises.</p>
Respondent 7	<p>Question 6 Most of the gambling within Llangennech RFC is by smart phone directly to gambling firms</p>	<p>Noted</p>	<p>No change required to policy</p>	<p>No Change</p>

Respondent 14	<p>Question 6 The policy should discourage the use of fixed odds betting terminals</p>	Noted.	No change required to policy	No change as it is a statutory entitlement.
Respondent 19	<p>Question 6 It would be useful if a local pathway / protocol was put in place to obtain Health Board views on gambling premise applications, particularly in ensuring that the council meets its licensing objective “protecting children and other vulnerable persons from being harmed or exploited by gambling”. This would be particularly important for instance, in considering location of premises near services for vulnerable people, particularly children and young people and drug or alcohol services.</p>	Noted.	The Policy will be amended to include a process for notifying the Health Board of Applications.	Paragraph 9.20(3)e inserted to outline the notification process.

	<p>It would be useful for the policy to state it will also consider related best practice guidance when assessing the impact of granting a licence. Such best practice frameworks include the following:</p> <ul style="list-style-type: none"> • Welsh Government Framework on Tackling the Night Time Economy • Alcohol Concern Cymru (2015) "The Relationship between Alcohol and Gambling Behaviours" <p>If training is given to staff of licensed premises on crime prevention, it is suggested that consideration should be given on including training on drug and alcohol related issues, particularly training on local policies for dealing with discarded needles and the risks of blood borne virus in order to protect staff.</p> <p>Training could also include awareness of the types of new and emerging drugs referred to as "New Psychoactive Substances"</p>	Noted	To amend the policy to confirm that decision makers will refer to relevant guidance.	Paragraph 9.20(3)f inserted to reflect this change.
		Noted	Amend Policy to reflect this advice.	Paragraph 9.20(3)g inserted to reflect this change

	<p>(Previously “Legal Highs”) in order to better equip staff to handle use on premises.</p> <p>Local services can provide short, bespoke courses free to licensed premises. It is suggested that given the evidenced links between gambling and problematic alcohol and / or drug use,</p> <p>Consideration should be given to suggesting gambling premises granted licenses should promote local help services for addressing gambling and drug and alcohol issues. Such promotional materials could be provided free of charge.</p>	Noted	Amend Policy to reflect this advice	Paragraph 9.20(3)g inserted to reflect this change
Respondent 20	<p>Question 3 Able to obtain advise from Working Men's Club & Institute</p>	Noted	No change required to policy	No Change
Respondent 23	<p>Question 6 Take into account location of gambling machines so that they do not tempt or harm young people.</p>	Noted	The policy already contains references to the Code of practice in relation to Gaming machines.	No Change

4) SUMMARY – KEY CHANGES TO THE GAMBLING POLICY

1. New section inserted regarding safeguarding advice for licence holders. (Page 13)
2. Notification of premises licence applications to the Health Board. (Page 13)
3. Information on how to access training courses for staff on drug and alcohol issues. (Page 13)
4. Signposting Gambling premises operators to the report of the Chief Medical Officer for Wales – Annual Report 2016/17 Gambling with our Health (Page 13)
5. Advising premises licence holders to keep premises risk assessments at the premises alongside the premises licence.(Page 23)
6. Require applicants for unlicensed Family Entertainment Centres to provide basic criminal conviction disclosures from the Disclosure and Barring Service. (Page 24)
7. Require applicants for Licensed Premises Gaming Machine Permits to provide plans of the premises as well as additional information regarding the supervision of the proposed machines, the nature of the premises and access for under 18s. (Page 26)



Gambling Act 2005 - Review of Gambling Policy Consultation Document 2018

Part 1 - About You

Are you responding as a...

Gambling premises license holder

Gambling permit holder

Premises license holder

Personal license holder

Club premises certificate holder

Member of the Public

Local business

Body representing license 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

No - I do not wish to be contacted

How we will use your information

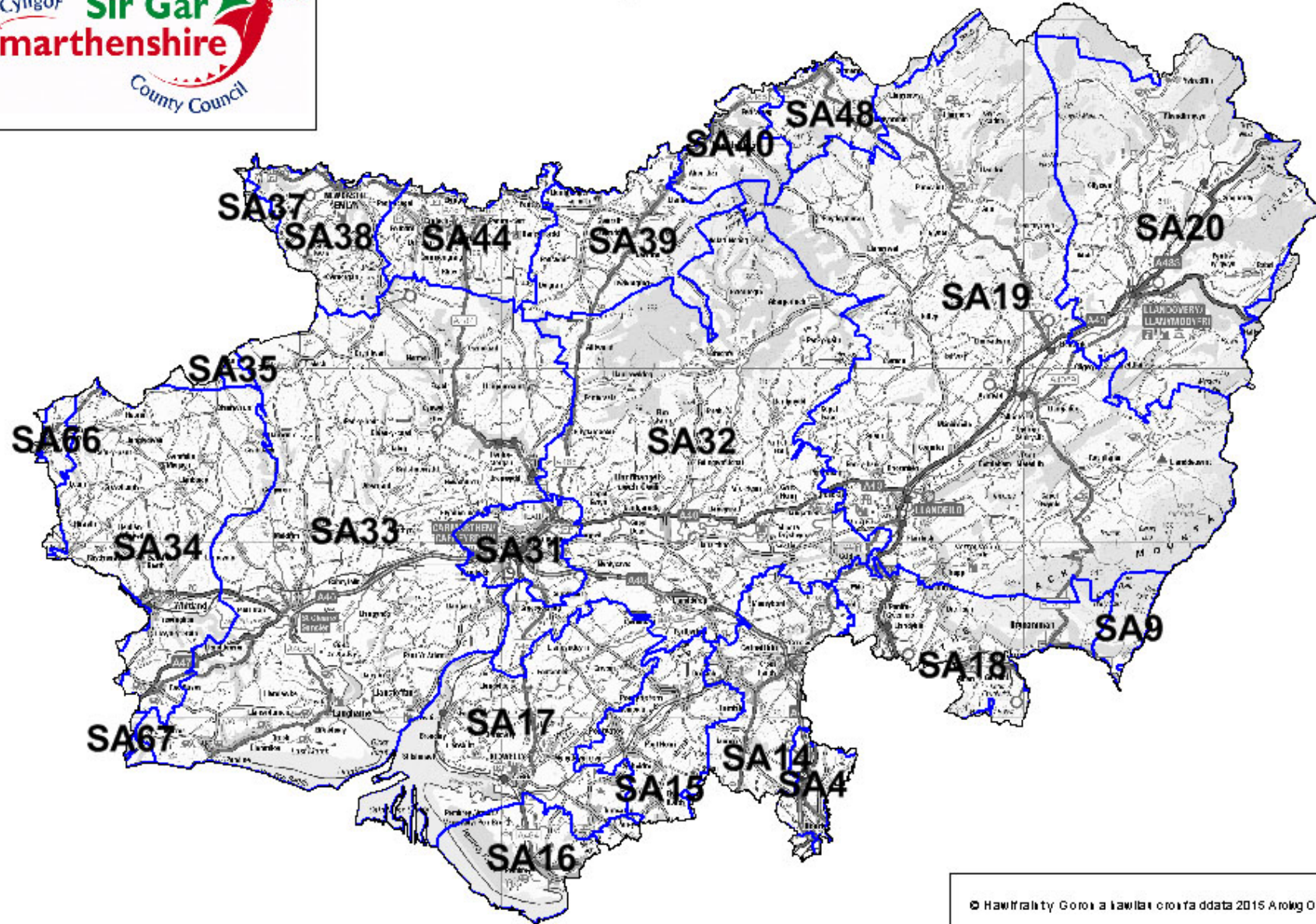
We are collecting personal data about you on this form to comply with requirements in the Gambling Act 2005 on carrying out consultations.

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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