

LA BULLETIN DECEMBER 2019

Happy Christmas”, “Nadolig Llawen”, “Nollaig Chridheil” to all LAs. The Commission wishes to thank you for all your contributions to the shared regulation of the Gambling Act this year, and we look forward to continued close partnership working in 2020.

News

LB Redbridge revokes alcohol licensed gaming machine permit

The Council's [licensing sub-committee revoked](#) the permit for 7 machines from a Wetherspoons pub following two failed test purchases when 16 year old police cadets were able to play the (over 18 only) category C gambling machines unchallenged. The council had written to the pub in January after the first failure and yet during the repeat test in July the pub staff had not challenged the youngsters.

The sub-committee allowed the pub to keep its automatic entitlement to 2 machines as the pub advised that it was trialling pressure pads located in front of the machines which sent a signal to a senior member of staff when someone stood on it, so that they would go and check their age, in addition to have improved signage and training.

Further information is available in the [papers for the sub-committee hearing](#)

Wetherspoons have since submitted an appeal - the hearing date is yet to be arranged.

This is the first case of its kind and follows on from the Commission's recent [announcement](#) that 84% of pubs in England and Wales are failing to prevent under 18-year-olds from playing Category C gaming machines, also known as fruit machines.

National Strategy updates

If you are interested in signing up to the latest developments on the [National Strategy](#) please email communications@gamblingcommission.gov.uk

Migrants are vulnerable to problem gambling

Ongoing studies, carried out by Dr Stephanie Bramley of King's College London, have revealed that [migrants can be more vulnerable to harm caused by problem gambling](#) due to social isolation, culture shock, language difficulties and a lack of access to, or awareness of, help available.

Shift work itself was also a factor, with unsocial hours leading to casinos and betting shops being the only option when you come off shift. Location of work can be a factor too. Dr. Bramley used the example of migrants working in and around London's Chinatown, which has a lot of casinos. Equally coming from a place where gambling is forbidden or heavily restricted is another factor- having access on the high street could be too much of temptation.

Dr Bramley suggest that a community-based approach could be the best way to help migrants with problem gambling. She recommends trusted people or organizations in the community be educated on problem gambling and trained to spot the signs, so they can then more effectively communicate with the person in need, in their own language and sensitive to their culture.

GamCare launches new gambling related financial harm initiative

With 66% of callers to the national gambling helpline disclosing that they have some level of debt, GamCare have brought together key sectors, including banking, debt advice, gambling treatment, and the gambling industry in a cross-sector approach to develop new initiatives and resources.

Overseen by an advisory panel, the project will generate:

- a new best practice framework for identification of and support for customers in financial difficulty as a result of gambling;
- a toolkit focused on supporting customer needs when in financial difficulty;
- a new cross-sector training programme;
- consistent and actively updated advice messaging.

PHE Gambling related harm evidence review

Public Health England are carrying out an [evidence review](#) of the health aspects of gambling-related harm to inform action on prevention and treatment, as part of the follow up to the Department for Digital, Culture, Media & Sport-led [review of gaming machines](#) and social responsibility in 2018.

PHE's objectives are

1. To describe the prevalence of gambling and gambling-related harms in England by socio-demographic characteristics, geographical distribution and year.
2. To identify the determinants of gambling and harmful gambling.
3. To identify and describe the harms to individuals, families, communities, and wider societal harms associated with problematic and harmful gambling.
4. To examine the social and economic burden of gambling-related harms.
5. To gather stakeholder views on gambling-related harms in England.

A peer-reviewed report will be completed by Spring 2020.

Betting and Gaming Council launches new cooling off measures for machines

The [Betting and Gaming Council \(BGC\)](#), launched in November 2019, replaces the Remote Gambling Association, Association of British Bookmakers and the National Casino Forum. It represents 90% of the UK betting and gaming industry (excluding lotteries) and comprises members who operate betting shops, online betting and gaming and casinos. Michael Dugher, current CEO of UK Music, will join the BGC in March 2020 as CEO.

The BGC has introduced an Anonymous Player Awareness System (APAS) on gaming machines in betting shops. APAS is a real time algorithm for machines which identifies areas of player behaviour that could indicate harmful play. At a point of £250 spend or a 30 minute play, consumers will be faced with a 30 second break in play (cooling off time) and player messaging. Staff will be simultaneously alerted allowing for a customer interaction where appropriate.

More banks enable customers to block gambling transactions.

[HSBC](#) and [Halifax](#) are the latest banks to recognise their role in supporting customers to manage their money and gamble responsibly. They have introduced measures intended to help problem gamblers from spending money with bookmakers and online casinos, joining the likes of Barclays, Santander, Lloyds and RBS who already have similar blocking features in place.

ASA finds house raffles ads misleading

The [Advertising Standards Authority \(ASA\)](#) ruled that entrants had been misled by the advertising by Raffle House, when the winner of its first competition received cash prize of less than 50% of the final profits instead of the London flat that had been advertised.

The [Commission's guidance](#) sets out the legal requirements on house raffles.

Consultations

Society lottery reforms

Following the Government's consultation on, and subsequent response to, potential changes to sales and prize limits for large and small society lotteries, the Commission is now consulting on measures to:

- Amend the limits within the Licence Conditions and Codes of Practice to reflect changes that the Government plans to implement through secondary legislation.
- Enable lottery consumers to make better informed decisions about whether to gamble.

The [consultation](#) closes on 12 March 2020.

Case Studies

Devon County Council: Problem gambling spotlight review

Devon county councillors were concerned about the harm that they had witnessed first-hand caused by problem gambling. Whilst Devon County Council (DCC) is not responsible for the direct provision of gambling establishments, the impacts of problem gambling have an impact on spend on services for vulnerable people.

To understand the scope of the challenge, and to understand what might help, scrutiny members undertook a [spotlight review](#). Recognising the role that scrutiny can have in bringing different agencies together to collectively problem solve, the scope of this spotlight review was:

- To understand the underlying causes of problem gambling and the challenges associated with problem gambling.
- To explore the ways in which DCC and partners could work together to prevent people who are at risk of problem gambling reaching crisis point.
- To identify the ways in which DCC and partners could work together to support people in Devon who have gambling addictions.

The spotlight review took place on the 7th August 2018 and was held in the form of a round table discussion with structured questions clustered around three themes:

- Prevention;
- Understanding when gambling becomes a problem;
- Identifying support available when someone is struggling with problem gambling.

The findings of the review were particularly focused around the need for reliable and accurate data. Several of the partners in the room committed to working together to better understand the scale of the problem as well as to support services that exist to help people with a gambling addiction.

A year on from this work there have been [several developments](#), although Councillors would like to see more. Particularly notable developments include:

- The Joint Strategic Needs Assessment now includes a detailed section of available data, bringing together information including prevalence, age, demographics, gambling restrictions, types of gambling, risks, impacts of gambling, links to other services, suicide, treatment and support services, national and local responses.
- DCC took part in promoting Responsible Gambling Week in both 2018 and 2019.
- The January 2019 NHS Long Term Plan includes commitments to strengthening public health and prevention, including an element directed at gambling.

- DCC Public Health working with coroners to improve coding in death certification following suicide.

The Committee is committed to continuing to improve services and support for people and their families and anyone whose lives are affected by gambling addiction.

Leeds City Council - gambling related harm campaign media pack for LAs

Leeds council's financial inclusion team developed a successful 'Beat the Odds' campaign to reduce the stigma in talking about gambling and encourage people to access support.

Leeds are keen to share campaign resources and following requests from a number of authorities have created a media pack with materials that can be tailored to your own authorities gambling related harm campaigns. Please contact Sophia Ditta (Sophia.Ditta@leeds.gov.uk) to request a copy of the media pack which includes images for postcards, flyers, posters, and banners as well as digital screen images.

Feature article

Citizens Advice Gambling Support Service (East Midlands)

By Greg Stenson, Project Lead for the Gambling Support Service in Derby

In 2018 GambleAware announced two year £1.5m partnership with Citizens Advice designed to help front line staff better understand, prevent and reduce gambling related harms – to be delivered via [10 hubs in England and two in Wales](#) (*click in "local initiatives" for the relevant contact details*).

Citizens Advice Mid Mercia is delivering the East Midlands Gambling Support Service (GSS) from two local bases: Sinfyn (Derby city) and Church Gresley (surrounding rural towns and villages in South Derbyshire).

Advocating a public-health approach, we are now working with local authorities and Public Health teams across the East Midlands region to improve the awareness of gambling-related harm and the steps that can be taken to mitigate associated risks.

We have been attending and presenting to all of the health & well-being groups, travelling across the whole region to deliver training and raise awareness through networking events and open days. The GSS project has received some really positive feedback, particularly in areas such as Bolsover, North-East Derbyshire and South Derbyshire.

One tool that we are advocating is the GambleAware Screening Tool- the method of identification that we use with every client accessing support at our local offices, having trialled it for 6 weeks during the summer before fully embedding it. The four questions of the [GambleAware Screening Tool](#) are a quick and efficient way of potentially identifying those at risk, or severely harmed directly or indirectly, by gambling.

South Derbyshire district council are extremely impressed with the project and are keen to push gambling into the forefront (both research & treatment). For example their housing department is asking the four screening questions to council tenants across all wards via a text messaging service.

Through advocating the pre-screening tool, and stressing the importance of early identification, we are hoping that more organisations will use a tool (such as the GAST)

within their internal assessments. We provide guidelines about the different scores, the appropriate level of support and how to refer to GamCare specialists.

We have also delivered front line training to a number of teams within Public Health Derbyshire including health improvement workers and disability support officers

We are working alongside Andrea Barber, the Public Health practitioner leading on measuring the scale of gambling related harm across the county. Her work includes mapping land-based establishments, comparing it to demographics and areas of deprivation, to see whether a pattern emerges. This work is linked to [PHE national strategy](#)

Gambling Commission advice and guidance

Revamped website for LA inspection forms

LAs are advised that our partners at LLEP (Leicestershire & Leicester Enterprise Partnership) who have worked with us to produce resources to help LAs with their inspections have updated [their website](#). Please update your saved links to this site accordingly.

Please note that the inspection templates and information for premises were updated in October to reflect the change of Codes of Practice which took effect at the end of October (in relation to customer interaction and alternative dispute resolution requirements).

Fund raising queries

Throughout the year, but particularly around the festive season, our contact centre receives a lot of fundraising related queries from LAs and the public.

LAs are encouraged to look at [our website](#) first, which has a range of information and advice about the requirements to be met when fundraising via:

- Incidental lotteries and Christmas raffles
- Private society lotteries
- Race nights
- Work lotteries
- Charity bingo or poker nights
- Small society lotteries.

It's worth remembering that customer lotteries/raffles cannot be used for fundraising and all forms of lottery that aren't promoted under a LA registration or Commission licence must not offer ticket purchasing online or via text/social media etc. There are also specific requirements about fundraising through non-commercial bingo and betting (including race nights), and poker nights.

Updated consolidated Code of Practice

From 1 January 2020, amended Social Responsibility Code 3.1(2) comes into force, which stipulates that the organisations receiving funds for delivering research, prevention, or treatment from licensees be subject to approval by the Gambling Commission. This follows a consultation held in December 2018. The [LA consolidated codes of practice document](#) has been updated accordingly.

Further information about the process for being on the approved RET contributions (research, education and treatment) list is available on [our website](#).

Premises register data review

We are carrying out a routine cleanse of the [national premises register](#), which is compiled from gambling premises information submitted to us by LAs. We are asking LAs to confirm that the information held is accurate and provide amendments where relevant. If you have yet to receive any correspondence about this data cleanse exercise please contact our data management team who are coordinating the work datamgmt@gamblingcommission.gov.uk

Reference materials

LLEP assessment templates

To help you meet LA regulatory obligations under the Gambling Act 2005 we worked with Leicester, Leicestershire and Rutland Licensing Forum and LLEP to produce a [range of resources](#) including a suite of assessment templates, information for premises and assessment outcome letters. Please share the findings of your visits with your compliance manager so that we can continue to build a broad picture of premises' compliance.

E-Learning modules

The Institute of Licensing and the Commission have worked together to produce some gambling e-learning modules:

- Gaming machines - three separate modules which cover the various types of gaming machines, the physical components and signage requirements and how to deal with non-compliant machines
- Inspection powers and inspection preparation – designed to help co-regulators familiarise themselves with their powers to enter and inspect gambling premises and the preparation to undertake before conducting an inspection of any gambling premises.
- Introduction to inspecting a betting premises – aimed at helping co-regulators improve their understanding of what to check when conducting an inspection of a betting premises - both inside and outside the premises.

These modules can be accessed by anybody via the [IOL website](#), and all are CPD accredited. Once on the website simply click on the 'e-learning' tab on the top right, then log in if you have an existing account, or request a log in via membership@instituteoflicensing.org to get started.

We also have several refresher modules for licensing officers which compliance managers can deliver at licensing meetings. Topics include machines, permits, money laundering, poker. If you are interested in receiving such training, please contact your compliance manager.

Quick guides and template letters

Some quick guides are designed to give to operators when undertaking visits, others provide an accessible 'how to' for licensing staff:

- [Public Health and Gambling](#)
- [Sharing information and intelligence](#)
- [Statement of Principles \(for councillors\)](#)
- [Money laundering](#)
- [Gaming machines in pubs](#)
- [Race night, casino night or poker night](#)
- [Members' club or commercial club](#)

- [Poker in clubs](#)
- [Poker in pubs](#)
- [Facilitating betting in pubs and clubs is illegal](#)
- [Skills with prizes](#)
- [Illegal gaming machines](#)
- [Comparing lottery ticket dispensers and B3A machines](#)
- [Illegal siting of gaming machines](#)
- [Fairs and fairgrounds](#)
- [Running a lottery](#)
- [Running prize competitions and free draws](#)
- [Multi activity sites](#)
- [Police statutory powers under the Gambling Act](#)
- [LA statutory powers of inspection under the Gambling Act](#)
- [Examples of non-complex category D gaming machines](#)
- [Templates for notification of automatic entitlement and application for licensed premises gaming machine permit](#)

Gambling Act statutory notices and forms

It is a statutory requirement that applicants use the correct forms to give proper notice of applications, variations etc to all responsible authorities, including the Gambling Commission.

We host all the [statutory notices and application forms](#) as they are no longer available on the DCMS website.

Find operating licence holders

We [publish](#) the names of all companies and individuals who hold, or have applied for, operating licences in Great Britain along with the names of companies or individuals whose licences have lapsed, been revoked, forfeited, expired, suspended or surrendered in the last 6 months.

LAs must check the operator licence quoted on premises applications with the register before granting a premises licence. An application for premises licence may only be made by persons who have an operating licence which allows them to carry out the proposed activity for example a bingo operating licence for a bingo premises or have applied for an operating licence (although the premises licence cannot be determined until an operating licence has been issued).

Premises licence register

The information on our publicly available [premises register](#) is based on the statutory notifications received from LAs regarding grants, variations, revocations, lapses etc, and is updated monthly. LAs are encouraged to send **all** necessary correspondence to info@gamblingcommission.gov.uk. Where email notification has been made it is not necessary to follow up by post.

In relation to gaming machines, we only require notification of grant/rejection of Club Machines Permits and Gaming Machine Permits. There is no requirement to advise us when an alcohol licence holder submits their notification for an automatic entitlement to two gaming machines. However, LAs must keep a record of how many automatic entitlement notifications it receives each year, as that information is requested in the [annual LA returns](#).