

Local authorities using scrutiny to tackle gambling harms

About Centre for Governance and Scrutiny

The [Centre for Governance and Scrutiny \(CfGS\)](#) is a social purpose consultancy, experienced in all aspects of governance and scrutiny. We support public, private and voluntary sector organisations through consultancy, research, training and events.

Since 2003 we have built expertise in local government and have worked with a large number of authorities across the UK. Through our research and policy development we have built a strong evidence base for impact, value and broader benefits of good governance and scrutiny.

1. Introduction

CfGS is working on a project with the [Gambling Commission](#) to raise awareness, and increase the involvement of elected members in overview and scrutiny roles, in tackling gambling related harms.

The COVID-19 pandemic significantly altered the gambling landscape by shifting activity online due to restrictions on people's movements, the cancellation of major sporting events and the closure of commercial venues. The most recent Gambling Commission statistics demonstrates a 7.7% decrease in licenced betting premises between March and November 2020 (the latest available data), and this is a continuing trend.

Many experts are now examining the impact of the pandemic upon gambling behaviours, alongside the increased availability and accessibility of gambling products, the use of multiple products, the time spent gambling and the alarming elevated risk of harms.

Gambling harms are an issue for every local authority in the UK, both from the perspective of the authority's wellbeing and community leadership role, and their regulatory responsibilities. The growing issue of gambling harms can also be considered within the wider commitment to reducing health inequalities and an equitable post-covid recovery.

Whilst many councils have discussed gambling harm within licensing committees, in the context of reviewing and updating the gambling policy statement, through our research we have found that tackling gambling harms is underexplored in local authorities. As with other public health issues, arguably there should be consideration of gambling harms at the highest level to ensure appropriate political and strategic priority.

There are however some recent examples of councils tackling gambling harms through their scrutiny committees – using this vital function to understand, evaluate and improve efforts that prevent and treat gambling harms in the community.

The following case study collection in section 3 presents the approaches that local authorities have taken through scrutiny, and highlights both a commitment to implementing the National Strategy to Reduce Gambling Harms and real progress towards supporting vulnerable people.

We hope that these examples will serve as useful precedents for councils either considering the topic on their scrutiny work programme or unsure of the approach to take.

As with any public health issue, reducing harm is often complex and involves a ‘whole systems’ approach. To inform the approach that scrutiny could take with tackling gambling harms, we have also included examples of scrutiny delivering benefits by reviewing other public health issues in section 4.

2. Common themes

The scrutiny work undertaken by the councils featured in this collection display some common themes, namely the benefits of:

- mapping areas of risk and vulnerable populations;
- bringing together local partners;
- involving stakeholders and victims;
- seeking to understand individual, social, economic, environmental and cultural factors, that influence a person’s experience of gambling harm;
- understanding gambling harms as a public health issue and advocating for a whole system approach to address this;
- recommending a coordinated action plan to prevent and reduce gambling harms;
- lobbying government through correspondence with the Department for Digital, Culture, Media and Sports (DCMS) to take action on gambling harms.

3. Scrutiny & gambling harms - case studies

Bradford Metropolitan District Council

Background

In 2019 Bradford's Corporate Overview & Scrutiny Committee members received a report that detailed how gambling businesses were mainly situated in some of the most deprived areas of the Bradford District.

Bradford has high prevalence of population groups particularly vulnerable to gambling related harm. Evidence indicates that particular groups are more vulnerable to gambling related harm than others - young people are one of these groups, and Bradford has the highest percentage (24.6%) of under 18s for a city authority in the country. People living in areas of greater deprivation is another vulnerable group, Bradford is ranked the 11th most income deprived local authority in England.

Scrutiny's role

The Corporate Overview & Scrutiny Committee was asked to consider the prevalence of problem gambling and gambling related harm within the district and the development of the Council's approach to problem gambling.

Over several scrutiny meetings, many different perspectives were sought to inform the committee. A representative from an organisation which campaigns to highlight the dangers of problem gambling – "Gambling with Lives" was present at the meeting to talk about the work of the organisation and how he had lost his own son through problem gambling. The committee also invited a representative of the gambling operator William Hill and a recovering gambling addict, appearing at separate meetings.

Members highlighted that a broader debate needed to be had with the industry on the issue of problem gambling. Following these scrutiny meetings, councillors were in agreement that more effective controls needed to be in place to tackle the issue of problem gambling in Bradford. You can find an example of the committee work on problem gambling [here](#).

Impact

Bradford's Corporate Overview & Scrutiny Committee made a range of recommendations, resulting in:

- The development of a Local Area Profile, including an interactive mapping tool, to identify areas of greater or specific risks of gambling related harm in the district.
- The inclusion of 3 questions relating to gambling in the Bradford Children and Young People Lifestyle Survey to inform local prevalence data.
- Promotion of Responsible Gambling Week and awareness raising in schools to explain the dangers of problem gambling to young people.

- Forming a cross-departmental organisational plan involving key partners from public health, children’s care and adult social care - focusing specifically on the issues identified in the Local Area Profile and other potential populations that could be deemed to be at risk.
- A letter to DCMS requesting:
 - additional powers for local authorities to prevent excessive clustering of betting shops and amusement arcades; and
 - introduction of a 1% levy on industry gross profits to pay for much needed research, education and treatment.

An detailed update on the actions taking following the scrutiny recommendations can be found [here](#).

Devon County Council

Background

Councillors in Devon had expressed concern about the impacts of gambling in their communities and were keen to explore its wider societal and economic effects. Scrutiny asked for Public Health to report on the issue - the report outlined that Devon’s seasonal tourism, high house prices and low wages has caused pockets of deprivation. This deprivation puts communities at risk to gambling related harms, the impacts of which are highly likely to have an effect on spend on services for vulnerable people.

The report by Devon County Council Public Health was presented to the Corporate Infrastructure and Regulatory Services Scrutiny Committee in January 2018, with suggestions from the Scrutiny Team as to how this issue could be constructively reviewed. A spotlight review was determined as the most useful way for scrutiny to review the subject matter.

Scrutiny’s role

In 2018 Devon County Council (DCC) undertook a scrutiny spotlight review of gambling-related harms, 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.

Although DCC is not a licensing authority or responsible for the direct oversight of gambling establishments, the review reflected the importance of the issue from a public health and partnership perspective, as well as the importance of Councillors having a community leadership role.

It took place over the course of one day in the form of a roundtable discussion with structured questions clustered around three themes: prevention, understanding when gambling becomes a problem, and identifying support available when someone is struggling with problem gambling.

Bringing together different stakeholders and partners to collectively problem solve, the parties involved included other Local Authorities, the Police, gambling charities and a company supplying gambling equipment.

The Spotlight Review was interested in whether there were specific characteristics and risk factors that led people to become problem gamblers. One concern was the link between gambling and suicide. The spotlight review was also concerned about the increasing trajectory of remote gambling, which often takes place online.

Impact

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.

You can read the report of the spotlight review [here](#). The report set out a series of recommendations to the Corporate Infrastructure and Regulatory Services Scrutiny Committee, Cabinet, the Police and the NHS in Devon.

The impacts of the report's recommendations include:

- The Joint Strategic Needs Assessment (JSNA) now reflects comprehensive available data on gambling harms.
- DCC's Public Health teams are working with coroners following instances of suicide to establish more accurately as to whether gambling is involved, where for example debt appears to be a contributory factor.
- Information on local gambling support services have been compiled and are being disseminated to relevant agencies.
- Promoting the Responsible Gambling Week.
- [Letters to DCMS](#) asking for commitment to the following actions:
 - Acknowledgement and direction to Public Health to address the mental health and suicide correlation with problem gambling;
 - Entirely phasing out the use of fixed-odds betting terminals (FOBTs)

An update on their progress after 12 months can be found [here](#).

Stockton-on-Tees Borough Council

Background

In 2018 for Stockton-on-Tees it was estimated that a minimum of around 1000-1200 people aged 16+ were problem gamblers, with a further 5600-6100 classed as being at-risk.

The council was aware of the mounting national concern in relation to gambling prevalence, the links to gaming, advertising, and the impact on young people. However, the Council had limited data on the scope of local gambling activity, aside from the location of licensed premises.

The Stockton-on-Tees Adult Social Care and Health Select Committee conducted a scrutiny review into gambling related harm. This review assessed for the first time how gambling affects the residents of Stockton-on-Tees.

Scrutiny's role

The aim of the scrutiny review was to conduct an investigation into the scale and effect of gambling in Stockton-on-Tees. It set out to consider the availability of information on local gambling activity, the types of activity, the licensing regime, and the relationships with local economic activity, health and wellbeing, and community safety. There was also a focus on problem gambling, risk factors, and the services and initiatives in place to provide support.

A wide range of national and local organisations provided evidence and guidance to inform the Committee's work. Stakeholders included: other Local Authorities, the Gambling Commission, GamCare and Edinburgh-based charity Fast Forward. The issues were also discussed at the Stockton Youth Assembly, and the Public Health team undertook mapping work amongst organisations working with young people. To inform the review, premises licenses and permits were mapped across the Borough against areas of deprivation.

Impact

A number of local authorities have begun to develop preventative approaches in their local areas, and a similar approach was proposed for Stockton-on-Tees. There were gaps in awareness and referral pathways in the local area, and a number of actions proposed to address this. The Scrutiny Review found that a greater preventative approach is needed and that training should be delivered to help staff who deal with customers to identify and support people who are struggling with gambling-related issues

The Committee's recommendations were aimed at developing an effective but proportionate response to an issue of growing national concern. The full 2018 report can be accessed [here](#).

The reviews recommendations led to the following outcomes:

- Producing a Local Area Profile to identify areas of greater or specific risks of gambling-related harm within the Borough.
- Developing the evidence base through frontline services recording involvement of gambling in issues of debt.
- Maintaining an overview of pilot schemes in relation to preventing gambling related harm and other opportunities for learning from other organisations
- Awareness of gambling-related harms, and available treatment and support organisations, promoted within the Council, Clinical Commissioning Group and partner organisations.

- The Council and the CCG further developing referral pathways to gambling treatment providers where appropriate.
- The training of local frontline staff from the voluntary and public sectors to help them identify people suffering from gambling-related harm.

A 2020 update on actions following scrutiny's recommendations can be found [here](#).

Leicester City Council

Background

In 2016 Leicester City Council established a Neighbourhood Services and Community Involvement scrutiny task-group to review of the impact of gambling on local communities.

The review was instigated by members concerned about the impact of Fixed Odds Betting Terminals (FOBTs) on vulnerable individuals. It was also highlighted that a lack of local data on vulnerability to gambling harms made it difficult to produce a gambling risk index for areas in which there was a cluster of gambling premises.

Scrutiny's role

By engaging with multiple local stakeholders to inform their review, the task group wanted to work with council departments, partner agencies and voluntary organisations to develop a wide-ranging series of proposals.

The scope of the review was to:

- Identify locations of venues which have gambling licences both within the city centre and communities away from the centre.
- Identify locations of FOBTs, both within premises licensed for gambling and other locations (for example premises licensed for alcohol).
- Consult with local and city agencies about the impact of gambling on individuals and within communities.
- The council's licensing policy for gambling is outside of the scope but the policy which is designed to protect vulnerable individuals will be assessed for its effectiveness and the way in which it is policed by licence-holders.

The Task Group invited witnesses from other Local Authorities, the Association of British Bookmakers, the Police, Public Health, commercial stakeholders and community representatives. The full report can be found [here](#).

Impact

Recommendations recognised areas of potential influence and areas of responsibility. The Executive response stated the task group report provided a valuable evidence resource on the effects of gambling in Leicester and would use it to promote the Council's position on changing licensing law, particularly in relation to fixed odds betting terminals.

Scrutiny recommendations led to the following actions:

- A number of recommendations related to the production of a local area profile, aimed to identify geographically based risks to people who are vulnerable to harm from gambling. The production of a local area profile is now part of the Council's gambling policy.
- Commitment to a regular forum between the Council, police and betting providers to discuss crime and anti-social behaviour associated with betting premises. As well as a mechanism by which problem gamblers could exclude themselves from a number of premises within the area.
- Leicester's Education and Children's Services Department, supported an education programme for secondary schools (11-16) around gambling as part of the PSHE and Citizenship curriculum

The executive response to scrutiny's recommendations can be found [here](#).

4. Scrutiny & public health issues - case studies

Middlesbrough Council – opioid dependency

Background

In 2020 Middlesbrough Health Scrutiny panel undertook a review on opioid dependency. There was an awareness across various services that increased opioid use was an issue of concern and it was extremely complicated to address.

Public Health England research showed that opioid deaths in the North East are over three times higher than in London, and Middlesbrough was identified as an area with one of the highest rates of drug misuse.

Members were concerned that individual circumstances and life experiences could lead to people being in a certain environment that could lead to harmful opioid dependency.

Scrutiny's role

The aim of the scrutiny review was to examine where the Council will be in 5 years' time in terms of reducing opioid dependency and supporting people in Middlesbrough with pain management. The review by looked at both prescription medicine and illegal street drugs.

The terms of reference were as follows:

- To examine local opioid dependency rates
- To consider the commissioned services in place and level of resource currently invested by the Council and partners
- To investigate the work undertaken by the Council and partners to tackle opioid dependency amongst:
 - Women

- Older opioid users
- Residents living in deprived wards
- To identify good practice and evidence-based approaches that aim to support opioid pain management (including campaigns to increase people’s knowledge of the risks associated with prescribed opioids and over the counter medications).

Impact

This review was ongoing at the time of publication in June 2021. This section will be updated when the recommendations have been confirmed, in the meantime you can read the draft report [here](#).

Wolverhampton City Council – youth violence

Background

Nationally, youth violence has become a hugely contentious public and political issue. Following a knife incident which tragically resulted in a young person losing their life, Wolverhampton Council made the decision to undertake a scrutiny review in 2018 of youth violence in the city.

Members were keen to reduce violent crime in young people across the city and strengthen prevention and resilience by identifying risk factors and causes of violent crime.

Scrutiny’s role

The group were committed to taking a systematic approach to the review and were aware of the public health approach to tackling violence.

The review specifically aimed to:

- Examine and understand the current situation regarding violent youth crime in the city;
- Gather information and evidence regarding youth crime in the city;
- Question witnesses and experts from partner organisations, groups and communities regarding their experiences of youth crime in the city;
- Make recommendations based on the evidence collected and to work with partners to see these recommendations implemented.

Impact

By taking a public health approach to violence reduction within the review scrutiny members were able to define the scale of the problem at a local level, examine the characteristics of those affected by violence and the risks that follow exposure to violent incidents.

Cabinet endorsed all 10 recommendations made by the review group, which included:

- That the Council collaborates further with voluntary and community sector organisations and communities to design and develop services for preventative approaches to tackling youth violence.
- That the Council develops a commissioning approach with the voluntary and community sector to tackle youth violence.
- That the Council considers how it can routinely build into its design and planning processes considerations relating to the creation of health, cohesive and safe communities.

You can read the review report in full [here](#).

Liverpool City Region – air quality

Background

In 2018 the Liverpool City Region (LCR) Combined Authority Overview and Scrutiny Committee agreed to undertake an Air Quality task and finish group review.

This review was a result of a growing consensus to take urgent action on addressing the challenges presented by poor air quality to health at a pan-city region level, as well as LCR's commitment to explore Clean Air Zones.

Scrutiny's role

There was an opportunity to link the scrutiny review with the on-going development of the technical feasibility study into air quality, this proved valuable in securing complementarity between the two workstreams.

Members heard extensive evidence over several sessions from a number of high-profile witnesses including those with expertise in the monitoring and management of air quality across the City Region, and a panel of expert witnesses from public health and Merseytravel.

Members discussed the complexity of the issues at stake, and the large number of factors that affected air quality. Equally, it was appreciated that responsibilities fell to many organisations.

Impact

Although the Combined Authority is not specifically covered by local air quality management legislation, the review came to the conclusion that it can and must act in response to raise the profile of the issue.

The recommendations produced by scrutiny were unanimously agreed, you can read the full report [here](#).

The following outputs from the task and finish group have had a considerable impact:

- The establishment of an Air Quality Task Force on a time limited basis, tasked with developing a city region-wide action plan.
- Members' recommendation that an action plan includes clear targets and is framed by performance objectives for air quality.
- The action plan recognised the important work of scrutiny in raising the profile of this longstanding problem across the city region and in maintaining members engagement in the process.

A 2020 update on recommendations put forward by scrutiny in finalising LCR's air quality action plan can be found [here](#).

London Borough of Camden – social isolation

Background

In 2017 Camden established a Health and Adult Social Care Scrutiny Panel to consider how the council could embed a Health in All Policies (HiAP) approach for the growing community issue of social isolation.

HiAP is an approach to public policies across sectors that systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts in order to improve population health and health equity.

Scrutiny's role

The review looked at the extent to which tackling social isolation was incorporated into strategic health and care decision-making and delivery in Camden. The panel provided an opportunity for local services to demonstrate their progress in tackling social isolation and promoting wellbeing

To achieve its purpose the panel:

- Researched good practice examples locally and nationally of where improving health and wellbeing is embedded into all policies and practice;
- Developed key lines of enquiry (KLOEs), against which to benchmark areas of work within the Council; and
- Undertook a 'deep-dive' review into four service areas (Green Spaces, Spatial Planning, Procurement and Estate Services)

Impact

The panel found many examples of existing activities that were supporting individuals and communities to be more connected, such as green space volunteering projects and caretakers proactively engaging with isolated residents. The panel's contributions resulted in the creation of a strategic plan to deliver change across the council, with progress to be reported to scrutiny annually.

You can access the panel's report [here](#).

The recommendations led to the following actions:

- Mainstreaming the reduction of social isolation and loneliness in the specific responsibilities of all members of staff across spatial Planning, green spaces and estates.
- The use of social value to drive a greater focus on social isolation through procurement and contracts.
- Developing a social value framework for Camden, and stronger links between procurement and community investment.

The follow-up report detailing the impact of the panel's work can be found [here](#).