

Consultation responses to Gambling Policy Statement 2022 – 2025

- Cults Community Council

Thank you for the opportunity to review and comment on the proposed changes to Aberdeen City Licensing Board Gambling Policy. We have reviewed the proposed changes, which we welcome and support and we hope they will be fully incorporated in the new policy

- Eleanor Sheppard, Chief Education Officer

No comments from me but thanks for sight of the document.

- Sport Aberdeen

I can confirm that we have read the draft Gambling Policy Statement and we have no comments to add. Many thanks for including us in the consultation”

- Police Scotland

“Thank you for the opportunity to comment on the draft Gambling Policy Statement. We make the following comments:

1. Ref page 5 and the comment: ‘Where an area has known high levels of organised crime...’

At this time, despite the potential for high levels of organised crime to occur and in full acknowledgement that such crime does exist, we are unable to substantiate any consistent and meaningful link between problem gambling and high levels of organised crime within the North East Division.

2. Ref Appendix 2, please amend our address to: Police Service of Scotland, North East Division, Marischal College, Broad Street, Aberdeen, AB10 1AB.

3. General comment:

Evidence of harm, in all its different presentations, arising from gambling-related problems or addiction, is not always obvious or readily identifiable and it is acknowledged that such issues may lie behind incidents and behaviours that lead to Police contact.

Between October 2018 and June 2021, North East Division recorded 46 incidents within Aberdeen city in which gambling-related problems were

found to be the root cause of the eventual incident. It can be reasonably expected that this is a conservative reflection of the true picture.

Looking at the circumstances, there appears to be some connection between gambling activities of some individuals and problematic personal issues, which can impact on their families and others around them. Online gambling is prevalent in many recorded incidents and is worthy of more detailed consideration within the Licensing Policy Statement and by the Gambling Commission.

An increased focus would be welcomed, to identify and support problem gambling, gamblers themselves and the facilitators, whether in regulated premises or online with the recognition that such a lifestyle can render individuals vulnerable and negatively impact those around them.

Notwithstanding the potential for the commission of acquisitive crime as a means to fund problem gambling, if an individual was to come to Police attention in this regard, appropriate referral would be made to identify the best means of support.

- Derek McGowan, Chief Officer, Early Intervention and Community Empowerment

The review of the Licensing Board's Gambling Act 2005 Policy Statement is welcome, as it provides the opportunity to consider knowledge and understanding of the impact of gambling across the City.

A key role for the Board, as noted in the policy, is to:

- Prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Ensuring that gambling is conducted in a fair and honest way; and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The consultation sets out steps for each objective above, detailing steps expected of operators. Without repeating them here, I believe these are the appropriate steps when viewed alongside the expectations set out in the Local Area Profile. Understanding the limits of Board responsibility, and the lack of specific definition in some crucial aspects of the legislation, for example a 'vulnerable person', I believe that the proposed policy sets out a responsible approach to regulating the gambling industry locally.

Having reviewed the data available on gambling sites and mapped against areas of the City where there is multiple deprivation, there is no direct link geographically between deprivation as defined in the Scottish Index of Multiple Deprivation, and the location of gambling premises. The recent Strategic Needs Assessment undertaken by

Community Planning Aberdeen did not identify problem gambling as an issue in the City, and therefore no projects have been identified.

However, this does not mean that there are not people in these areas who experience problem gambling. Perhaps the more telling statistic is the prevalence of treatment centres across the City centre area, the area with the highest density of not only gambling premises but licensed alcohol premises.

The Gambling Commission strategic assessment (2020, updated February 2021) identifies betting premises as by far the most common place to bet, and there is certainly a benefit to this – as with all physical premises – as staff in the premises can monitor behaviour and spend and act appropriately in their premises. However, this assessment also sets out the rise in online gambling, nearing £6billion per annum, and that 50% of online gambling is now done over a mobile phone. This demonstrates the ease of access now possible to gambling. This is not an area for the Board to regulate, but to have awareness of as they set out their policy, and the potential links between physical premises and changing to online gambling are important in this context.

The link between gambling at a young age and developing problem gambling later in life demands focus on family entertainment centres, ensuring appropriate access, and the regulation of advertising. This is an issue the proposed policy is clear on regarding accessing Category C machines, but the Board should maintain vigilance on this when addressing applications.

The proposed policy appears robust in regulating and tackling the issues it can locally. However, one area the Board may wish to consider is the link between gambling in premises and online gambling and including a section identifying steps and assurances around online gambling, and a section that sets out how to seek assistance for problem gambling. These would both assure operators and the public that the Board was aware of the wider issues around gambling and set this policy more clearly amidst social and national policy.