

# **LICENSING COMMITTEE (LICENSING ACT 2003 FUNCTIONS) ADDENDUM**

**3.00PM, THURSDAY, 10 OCTOBER 2024**

**COUNCIL CHAMBER, HOVE TOWN HALL, NORTON ROAD,  
HOVE, BN3 3BQ - HTH/CC**

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# ADDENDUM

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# Brighton & Hove City Council

## LICENSING COMMITTEE

## Agenda Item 15(c)

**Subject:** Members Letters

**Date of Meeting:** 10 October 2024

**Wards Affected:** All

### FOR GENERAL RELEASE

#### 1. SUMMARY AND POLICY CONTEXT:

1.1 To receive any Members letters submitted to Democratic Services.

#### 2. RECOMMENDATIONS:

2.2 That the Committee responds to the Members letters.

### LETTER TO LICENSING COMMITTEE

Dear Cllr McGregor, Chair of the Licensing Committee,

I am writing to request that this Licensing Committee accepts the need to organise and promote a citywide LGBTQ+ Safe Spaces App. for Brighton & Hove as part of an organised strategy to make the city more welcoming and safer for everyone who either lives or visits here. Currently, the city lacks a citywide, unified way for members of the LGBTQ+ community and all vulnerable groups to identify safe spaces if the need is required whether physically or emotionally. Previous attempts to create a safe spaces app. failed due, in part, to the involvement of the police who are generally mistrusted by the LGBTQ+ community, and others, including women who have felt amongst others, ignored, blamed and shamed.

The Back Off. Back Up. (BOBU) app already successfully exists. It was designed and created by #acrossrainbows, however it needs to expand its network for it to provide a fully inclusive citywide safe spaces service, where staff have been given correct queer-centred inclusivity training to assist anyone feeling concerned or unsafe. **This** aligns with the city's commitment to safety, diversity and inclusivity, and will help local businesses create safer environments for all residents and visitors, particularly vulnerable communities.

The BOBU app will:

A. Create safe, inclusive, and welcoming public spaces for all, with a strong focus on the LGBTQ+ community and other vulnerable groups.

B. Connect users to local businesses that prioritise respect, safety, and inclusivity through a comprehensive training programme

C. Helps user find nearby restaurants, venues, and businesses that have undergone special training to provide safe and inclusive environments. These designated "safe spaces" offer:

- a. A refuge where people can leave uncomfortable situations.
- b. Staff who are ready to help without questions.
- c. Areas to charge phones or arrange rides home.

D. Enables people to socialise comfortably in safe spaces, promoting acceptance and inclusivity.

E. Provide stress-free access to a directory of inclusive businesses, including venues offering sexual health support (e.g., HIV testing) while maintaining user privacy.

In order to make the app more inclusive, it needs to be effectively promoted. As a way of centralising contact information and to encourage a unified, citywide app, it is proposed that venues sign up via the BHCC website to qualify for a 50% discount on the BOBU programme fee. It is also requested that opportunities to discuss safety in Brighton & Hove are initiated between #acrossrainbows and relevant Council teams.

Therefore, I am requesting that this committee either notes this proposal or requests a report to assess the viability of the council to bring these proposals to fruition.

Yours sincerely,

Cllr Kerry Pickett

Licensing Committee (Licensing Act 2003 Functions) (Opposition Spokesperson)

Licensing Committee (Non-Licensing Act 2003 Functions) (Opposition Spokesperson)

Supporting Information:

[1] [Back Off. Back Up. | Download the BOBU App | Brighton & Hove UK \(backoffbackup.com\)](https://backoffbackup.com)

[2] [Across Rainbows | LGBTQ+ Community | Brighton & Hove](#)

# Brighton & Hove City Council

## LICENSING COMMITTEE

## Agenda Item 16

Date of meeting: 10 October 2024

Ward(s) affected: All

### OFFICER AMENDMENT

#### Gambling Policy Review 2025 – 2027

To amend paragraph 4.3 and the supporting documentation section in the report that deletions are made as shown with ~~strike through~~ below and additional text are added as shown in ***bold italics*** below:

- 4.3 A total of 5 response were received. There is wider review being conducted and pending amended advice to local authorities.

*Consultation responses via letter, email and Your Voice portal.*

From:	Response:	Whether accommodated or reasons not:
Gamcare	The alterations are minor, and we do not believe will have any negative impact. See Appendix 3	support for policy with recommendations
Your Voice	Consultation responses received.	1 support for policy and 2 not sure.
Green Party	A number of proposals to policy change have been suggested in document.	See <del>appendix 3</del>

#### Supporting documentation

##### 1. Appendices

##### 1. ~~Proposed statement of~~ **Appendix 1 - Gambling policy 2025 - 27**

~~Documents in Members Rooms None~~

~~Background Documents None~~

##### 2. ~~Local Area Profile~~ ~~Currently being completed by Public Health Team~~ None

~~Background Documents None~~

# Brighton & Hove City Council

3 **Appendix 2** - Consultation Responses Your Voice survey responses included in committee report page 13 Green Party and Gamcare appendix 3

Paragraph 4.3 and the supporting documentation section to read as follows:

4.3 A total of 5 response were received. There is wider review being conducted and pending amended advice to local authorities.

*Consultation responses via letter, email and Your Voice portal.*

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Your Voice	Consultation responses received.	1 support for policy and 2 not sure.
Green Party	A number of proposals to policy change have been suggested in document.	See <b>appendix 2</b>

## Supporting documentation

### 1. Appendices

- Appendix 1 – Gambling Policy 2025 – 27
- Appendix 2 - Consultation Responses (Your Voice survey responses included in committee report) Green Party
- Appendix 3 - Gamcare

Siân Berry MP



HOUSE OF COMMONS  
LONDON SW1A 0AA

**Brighton and Hove City Council**

by email to: [ehl.licensing@brighton-hove.gov.uk](mailto:ehl.licensing@brighton-hove.gov.uk)

15 September 2024

Dear Councillors,

**Consultation on Brighton and Hove's Gambling Policy 2025-27**

I am writing to respond to the consultation on Brighton and Hove City Council's draft Gambling Policy for 2025-27, and to propose further actions the council could take to reduce the harm done by gambling in our city.<sup>1</sup> This review is a real chance to do more to reduce gambling harm, and for the council to increase the urgency of its actions to persuade Government to do more.

We have clear evidence that gambling harms are increasing. We have a large number of the gambling establishments in the city and, along with the large amount of advertising that takes place for the major bookmakers and – increasingly - high street slot machine outlets, these premises create a real risk of harm to those who already have problems with gambling, and to children and wider society.

In addition, advertising for online gambling is also prevalent in the city, and it is common for adults and children to see these adverts online as well. As a licensing authority with a duty to work towards the protection of: "children and other vulnerable persons from being harmed or exploited by gambling," the council should be seeking to reduce all kinds of harm in every way it can, and my proposals around advertising for the council and Government more widely would help to do that.

**Premises with gambling in Brighton and Hove**

The prevalence of premises where authorised gambling currently takes place was 257 in May 2024, broken down as follows:<sup>2</sup>

- Betting Premises Licences 25
- Bingo Premises Licences 2
- Adult Gaming Centre Premises Licences 5
- Family Entertainment Centre Premises Licences 2
- Family Entertainment Centre Permits 4
- Alcohol licensed premises providing two or less gaming machines 183
- Alcohol licences premises providing three or more gaming machines 22
- Club Gaming Permits 3
- Club Machine Permits 5
- Casinos 4
- Betting Track 2

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## **Problem gambling among adults**

The Government's 2018 evidence review into gambling-related harms estimated that 0.5 per cent of the adult population had a problem with gambling, with 3.8 per cent gambling at at-risk levels, and 7 per cent affected negatively by another person's gambling.<sup>3</sup>

However, since that review, the Gambling Commission has begun publishing experimental estimates based on updated methodology and new survey questions. This has more recently assessed the problem gambler rate to be much higher. In these surveys, 2.5 percent of respondents scored 8 or more on the Problem Gambling Severity Index (PGSI).<sup>4</sup> Based on the Office for National Statistics' latest population estimates, this would imply that over one million adults in Great Britain are now problem gamblers and, if the same proportion holds here, more than 5,000 adults in Brighton and Hove

The number of people seeking help for gambling-related harms has also increased in recent years. The National Gambling Helpline hit record-breaking service levels in 2023, receiving more calls and online chats than any previous year. A total of 52,370 calls and online chats were made to the Helpline, a 24 per cent increase compared with the year before, and August 2023 was the busiest month on record. December 2023 also saw a 39 per cent increase compared with the same month the year before, and this was the busiest Christmas period ever recorded by the helpline.

In July 2023, the NHS also reported significant growth in demand for its gambling harms services and, following an increase in referrals, announced that it was opening up seven new gambling clinics, adding to the eight already in operation.<sup>5</sup>

## **The impact of gambling marketing on vulnerable adults and children**

The most recent Public Health England review in 2021 stated that there was not yet enough empirical evidence to link gambling marketing specifically to the increase in problem gambling, the following observations have been made:

Problem gamblers self-report to be more affected by gambling advertisements than non-problem gamblers. In February 2023, the Public Health journal published an article reviewing evidence on the impacts of gambling-related advertising that could lead to gambling-related harm. This evidence review noted that a: "higher percentage of those experiencing moderate risk or problem gambling reported that social media promotions for gambling increased their problems compared with low-risk and non-problem gamblers."<sup>6</sup>

The activity of problem gamblers has been reported to contribute significantly to the profits of the gambling industry. A 2018 report from the think tank Respublica estimated that almost a quarter of online gambling profits are derived from problem gamblers, with a further third of the profit share derived from those who are at risk of becoming problem gamblers.<sup>7</sup>

A significant portion of gambling industry revenue is spent on marketing. Up to date figures regarding how much the gambling industry spends on marketing are not publicly available. However, a 2018 report from Regulus Partners estimated that gambling advertising and marketing spending increased from around £1 billion in 2014 to over £1.5 billion in 2017.<sup>8</sup> Statistics published by the Gambling Commission have estimated total industry revenue in the year to March 2017, excluding the National Lottery to be £10.8 billion.<sup>9</sup> This suggests that potentially more than ten per cent of industry revenue is spent on marketing.

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The House of Lords committee that examined this issue in 2020 expressed skepticism of claims that there was not a link between advertising and problem gambling:<sup>10</sup>

“Plainly the companies would not spend increasingly large sums on advertising if they did not believe that this would increase either the overall amount gambled, or the amount gambled with their company, or both, and it does indeed seem counter-intuitive that this should not also result in an increase in gambling-related harms.”

The GambleAware, charity commissioned research looking into the extent, nature and impact of gambling marketing and advertising on children, young people and vulnerable groups in the UK.<sup>11</sup>

Findings reported in 2020 that almost all children and young people reported being exposed to gambling adverts, with only 4 per cent of 11- to 24-year-olds participating in the study reporting no exposure in the previous month.

The most common routes for seeing gambling advertising were:

- through television (85 per cent)
- shops on the high street (70 per cent)
- social media (66 per cent).

The study found that for young people who did not currently gamble: “exposure to advertising was significantly associated with likelihood to gamble in the future.”

### **Action for the council through this policy and proposals to Government**

In order to achieve the harm reduction objective within our gambling policy in Brighton and Hove, action should be taken through amendments to the policy under consultation, since it is backed up by strong and increasing evidence of harm.

However, with the gambling industry – and gambling advertising – increasingly reaching vulnerable adults and children at home and online, I believe we are obligated to push for stronger measures from Government to reduce this kind of harm to our residents as well.

Therefore I propose the following measures and actions for the council, both within this policy and in its wider work, since the duty to work towards the protection of children and other vulnerable persons from being harmed or exploited by gambling does not end simply when planning and licensing decisions are made.

1. The new policy should include a goal to reduce the harm done to people who already suffer from problem gambling. These people are clearly part of the category of ‘vulnerable people’ set out in the current set of licensing objectives, and the policy should set clear and measurable targets for this to reduce.
2. The new policy should immediately prohibit any increase on the current number of gambling establishments, and on the number of gaming machines hosted by other establishments in this city, introducing a principle of ‘one in one out’.
3. The council should, through this policy or other policies that help to achieve its objectives, prohibit the advertising of gambling on every billboard, bus stop, and any other ‘outdoor’ advertising sites within the city, including on buses.

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4. The council should collect and analyse data locally on the extent of problem gambling, gambling by young people and other aspects of gambling harm.
5. In the implementation of the policy, in the event that the data being collected shows the problem getting worse and harm to vulnerable people increasing, the policy should specify that the application of the principle of 'one in one out' would be suspended and be replaced with one in which no new permissions are given at all, even to replace establishments that have closed, until the data was seen to improve.
6. The council should consider making use of the Sustainable Communities Act to make a proposal, alongside other councils who have taken action on gambling advertising in this way, to make a proposal to Government to extend this ban on outdoor public advertising nationally, in order to make sure our city can be truly free of gambling advertising and to assist other areas around the country in reducing the harm caused by problem gambling.
7. The council should join me in working to push the Government to also take further steps, including:
  - a) to dramatically reduce the exposure of children to advertising from gambling companies on television and online, particularly during television and radio sports broadcasting,
  - b) to reduce the amount of gambling advertising to which adults are exposed even in theoretically age-restricted locations online and after TV watersheds, and
  - c) to prohibit the sponsorship of sports teams by gambling companies.

I hope you will take up these proposals and actions, and I would be delighted to have a meeting with you about these issues to explore further their potential benefits.

Yours sincerely,

**Siân Berry**  
**MP for Brighton Pavilion**

<sup>1</sup> <https://www.brighton-hove.gov.uk/business-and-trade/licensing-and-gambling/gambling-policy-2025-2027-consultation>

<sup>2</sup> Section 9.4 of the draft Gambling Policy sets out the number of Gambling Authorisations in Brighton and Hove.

<sup>3</sup> <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary--2>

<sup>4</sup> <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/gambling-participation-and-the-prevalence-of-problem-gambling-survey-final>

<sup>5</sup> <https://www.england.nhs.uk/2023/07/nhs-doubles-gambling-clinics-as-referrals-soar/>

<sup>6</sup> <https://www.sciencedirect.com/science/article/pii/S0033350622003420>

<sup>7</sup> <https://www.respublica.org.uk/wp-content/uploads/2018/08/Online-Gambling-Addicted-to-Addiction.pdf>

<sup>8</sup> <https://www.gambleaware.org/sites/default/files/2020-12/2018-11-24-rp-ga-gb-marketing-spend-infographic-final.pdf>

<sup>9</sup> <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/industry-statistics-february-2024-correction>

<sup>10</sup> <https://committees.parliament.uk/publications/1700/documents/16622/default/>

<sup>11</sup> <https://www.ipsos.com/sites/default/files/ct/publication/documents/2020-03/gambling-marketing-advertising-effect-young-people-final-report.pdf>

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## **GamCare’s response to Brighton and Hove County Council – Consultation on the revision of statement of principles under the Gambling Act 2005**

### **About GamCare:**

GamCare is an independent charity and the leading provider of information, advice, and support for anyone affected by gambling harms. We operate the National Gambling Helpline, provide structured support for anyone harmed by gambling, and create awareness about safer gambling and treatments. For 26 years, our confidential, non-judgemental services, have supported more than half a million people to get their lives back on track.

We hold data locally and nationally through our National Gambling Helpline. We also work closely with those who have lived experience in shaping and delivering our services and programmes, ensuring that all our work is coproduced with our lived experience community at its heart.

### **GamCare’s comments on the revision of the statement of principles:**

- We welcome the position Brighton and Hove County Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles.
- Local authorities can play a greater role in reducing gambling harm, particularly for those of our clients who experience harm in land-based gambling venues, due to council’s licensing responsibilities.
- It is vital that Brighton and Hove County Council develops a local picture of the level of gambling harms, in order to best target resources and tailor service provision. This could be achieved by gathering data from the National Gambling Helpline, as well as those already providing services in the area.
- Building on the proactive approach the council is already taking, we would like to see Brighton and Hove County Council commit in its statement of principles **to a public health approach** to gambling.
- This commitment should include training frontline and primary care staff to recognise the signs of gambling harm and develop referral pathways to the National Gambling Helpline or local treatment providers. GamCare has worked with Haringey Council to implement a similar system, that has received widespread support.
- In the absence of Cumulative Impact Assessments as a method by which the “aim to permit” approach can be challenged, Brighton and Hove County Council should continue to pursue a [Local Area Profile](#) approach that specifically analyses gambling risk, and use this data as a basis from which to scrutinise and possibly oppose a licensing application.
- The changes to Brighton and Hove County Council’s statement of principles should be viewed in the context of the Gambling Act Review and subsequent process of white paper consultations, so take account of the rapidly changing regulatory environment.

*If you have any questions or would like to discuss in more detail, please contact Pollyanna Hopkins, Senior External Affairs Officer: [pollyanna.hopkins@gamcare.org.uk](mailto:pollyanna.hopkins@gamcare.org.uk)*

