

Siân Berry MP



HOUSE OF COMMONS
LONDON SW1A 0AA

Brighton and Hove City Council

by email to: 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.¹ 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:²

- 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.³

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).⁴ 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.⁵

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."⁶

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.⁷

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 2017.⁸ 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.⁹ 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:¹⁰

“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.¹¹

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

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

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

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

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

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

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

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

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

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

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

¹¹ <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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