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## 1. Introduction

The purpose of this document is to, in accordance with the Gambling Commission's **Gambling Guidance for Local Authorities**<sup>1</sup> and Southwark's current **Statement of Gambling Licensing Policy**<sup>2</sup>, highlight areas in the borough inhabited or frequented by people who might be more at risk of being harmed or exploited by gambling.

As stated in the Gambling Commission's **Licence Conditions and Codes of Practice (LCCP)**<sup>3</sup>, licensees have a social responsibility to assess local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises. Although not a requirement for licensing authorities to complete a risk assessment of the local environment, it is emphasised by the Gambling Commission that such risk assessments, referred to as **local area profiles**, are of significant benefit to both the licensing authority and operators. The benefits, as listed under section 6.53 of the **Gambling Commission's guidance**<sup>1</sup>, are:

- (i) it enables licensing authorities to better serve their local community, by **better reflecting the community and the risks within it**;
- (ii) **greater clarity** for operators **as to the relevant factors in licensing authority decision-making**, will lead to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application;
- (iii) it **enables** licensing authorities to make **robust but fair decisions**, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge; and
- (iv) it encourages a proactive approach to risk that is likely to result in **reduced compliance- and enforcement action**.

Based on the appreciation of having a better awareness of the local area and its associated risks, whether potential, actual, or emerging, **Southwark Council**

- **will provide a local area profile for each gambling licence application it receives**, and
- **has provided**, under **section 3** of this document, **an overview of the geographical areas in the borough identified as currently being of greater risk to gambling-related harm**.

## 2. Southwark's approach to local area profiles

This section describes steps ① to ④ of the process followed by Southwark Council to identify areas of greater risk to gambling-related harm in the borough.

① The process started with the **Gambling Act 2005**<sup>4</sup>, which prescribes in its licensing objectives the **protection of children and other vulnerable persons from being harmed or exploited by gambling**. Southwark Council has thereupon expressed in its **Statement of Gambling Licensing Policy**<sup>2</sup> that special consideration is given in relation to the proximity of gambling premises to

- local schools, youth clubs, shops, parks, leisure and recreational establishments and any other similar premises directed at, or primarily used by children or families;
- places where vulnerable people are housed or treated, including clinics, recovery centres, outpatient clinics and homes;
- residential areas where there is a high concentration of children and young people or vulnerable people;

- areas where there is a high level of organised crime;
- places of worship, community facilities or public buildings; and
- areas where there is considered to be an over-concentration of similar existing licensed operation.

② The second step was to establish who the **other vulnerable persons** would be. A **study**<sup>5</sup> conducted by Heather Wardle at the Geofutures Gambling and Place Research Hub, found that although anyone could be vulnerable to gambling-related harm, there was sufficient to strong evidence to suggest that, in addition to young people, the following groups of people could potentially be more vulnerable:

- problem gamblers who are seeking treatment;
- those living in the most deprived areas;
- those with financial difficulties / debt;
- those affected by substance abuse / misuse;
- those affected by poor mental health;
- those who are unemployed;
- those who are homeless; and
- those from minority ethnic groups

③ The third step was to identify the **datasets** relevant to the location- and vulnerable persons criteria listed under steps ① and ②. Tables 1A and 1B provide, by criteria, summaries of the data relevant to Southwark.

Table 1A: Location criteria	Identified datasets and data sources
• local schools	Register of educational establishments in England and Wales ⇒ Department for Education, <a href="http://www.education.gov.uk/edubase/home.xhtml">http://www.education.gov.uk/edubase/home.xhtml</a>
• youth clubs	Youth clubs listed on Southwark Council and Community Southwark webpages ⇒ <a href="http://www.2.southwark.gov.uk/info/200246/activities_and_things_to_do/1439/youth_clubs">http://www.2.southwark.gov.uk/info/200246/activities_and_things_to_do/1439/youth_clubs</a> ⇒ <a href="https://www.communitysouthwark.org/organisations-venues/venues">https://www.communitysouthwark.org/organisations-venues/venues</a>
• shops used by families / children	List of shopping centres, supermarkets, and stores relevant to children / families ⇒ Southwark Council's APP premises database
• parks (including play areas)	MapInfo files for parks, open spaces, play areas and adventure playgrounds ⇒ Southwark Council's GeoStore, maintained by the council's Corporate GIS Team
leisure and recreational establishments used by families / children	Amenities listed on Southwark Council and Community Southwark webpages, and APP ⇒ <a href="http://www.2.southwark.gov.uk/info/200006/arts_in_southwark/1122/theatres">http://www.2.southwark.gov.uk/info/200006/arts_in_southwark/1122/theatres</a> ⇒ <a href="http://www.2.southwark.gov.uk/info/200087/sports_and_leisure/919/leisure_centres">http://www.2.southwark.gov.uk/info/200087/sports_and_leisure/919/leisure_centres</a> ⇒ <a href="http://www.southwark.gov.uk/events-culture-and-heritage/museums-and-galleries-in-southwark">http://www.southwark.gov.uk/events-culture-and-heritage/museums-and-galleries-in-southwark</a> ⇒ <a href="https://www.communitysouthwark.org/organisations-venues/venues">https://www.communitysouthwark.org/organisations-venues/venues</a> ⇒ Southwark Council's APP premises database
• vulnerable people housed or treated: Please see <b>Table 1B</b>	
• residential areas with high concentration of children / young people / vulnerable people: Please see <b>Table 1B</b>	
• areas with a high level of organised crime	List of suspected and actual child sexual exploitation offences, human trafficking / modern slavery offences, and drug trafficking offences committed between 1 <sup>st</sup> April 2014 and 28 <sup>th</sup> February 2017 ⇒ Metropolitan Police Service's Crime Report Information System (CRIS)
• places of worship	List of faith premises in Southwark ⇒ Southwark Council's APP premises database (Usage codes E06, E17, F76)
• community facilities / public buildings	Community centres / tenants' halls, libraries and other public buildings listed on Southwark Council and Community Southwark webpages ⇒ <a href="http://www.southwark.gov.uk/libraries/find-a-library">http://www.southwark.gov.uk/libraries/find-a-library</a> ⇒ <a href="https://www.communitysouthwark.org/organisations-venues/venues">https://www.communitysouthwark.org/organisations-venues/venues</a>
areas with an over-concentration of similar existing licensed operation	List of current licensed gambling premises in Southwark ⇒ Southwark Council's APP premises database

Table 1B: Vulnerable persons criteria	Identified datasets and data sources
<ul style="list-style-type: none"> <li>• children (under the age of 18 years) and young people (students in higher education)</li> </ul>	<ul style="list-style-type: none"> <li>① Number of residents aged under 18 years ⇒ <a href="https://www.nomisweb.co.uk/census/2011/qs103ew">https://www.nomisweb.co.uk/census/2011/qs103ew</a></li> <li>② Register of educational establishments in England and Wales ⇒ Department for Education, <a href="http://www.education.gov.uk/edubase/home.xhtml">http://www.education.gov.uk/edubase/home.xhtml</a></li> <li>③ Student accommodation in Southwark <ul style="list-style-type: none"> <li>⇒ Southwark Council's APP premises database</li> <li>⇒ <a href="http://www.arts.ac.uk/study-at-ual/accommodation/halls-of-residence/">http://www.arts.ac.uk/study-at-ual/accommodation/halls-of-residence/</a></li> <li>⇒ <a href="http://www.crm-students.com/crm-accommodation/london/">http://www.crm-students.com/crm-accommodation/london/</a></li> <li>⇒ <a href="https://housing.london.ac.uk/find-accommodation/registered-private-halls-residence/south-east-london-halls">https://housing.london.ac.uk/find-accommodation/registered-private-halls-residence/south-east-london-halls</a></li> <li>⇒ <a href="http://www.kcl.ac.uk/study/accommodation/residences/index.aspx">http://www.kcl.ac.uk/study/accommodation/residences/index.aspx</a></li> <li>⇒ <a href="http://www.lsbu.ac.uk/professional-services/accommodation-office">http://www.lsbu.ac.uk/professional-services/accommodation-office</a></li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• problem gamblers seeking treatment</li> </ul>	no data available for Southwark
<ul style="list-style-type: none"> <li>• living in the most deprived areas</li> </ul>	English indices of deprivation 2015 ⇒ <a href="https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015">https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015</a>
<ul style="list-style-type: none"> <li>• financial difficulties / debt</li> </ul>	<ul style="list-style-type: none"> <li>① List of food banks in Southwark ⇒ <a href="https://southwark.foodbank.org.uk/locations/">https://southwark.foodbank.org.uk/locations/</a></li> <li>② List of pawnbrokers in Southwark ⇒ Southwark Council's APP premises database</li> <li>③ List of pay day loan shops in Southwark ⇒ Southwark Council's APP premises database</li> </ul>
<ul style="list-style-type: none"> <li>• substance abuse / misuse</li> </ul>	List of drug and alcohol treatment services, narcotics and alcoholics anonymous meetings, and needle exchange services ⇒ Southwark Council's Drug and Alcohol Action Team (DAAT)
<ul style="list-style-type: none"> <li>• poor mental health</li> </ul>	List of GP practices treating patients for schizophrenia, bipolar affective disorder and other psychoses ⇒ Health & Social Care Information Centre (HSCIC) <a href="http://www.hscic.gov.uk/catalogue/PUB18887/qof-1415-prac-MHNeurogroup.zip">http://www.hscic.gov.uk/catalogue/PUB18887/qof-1415-prac-MHNeurogroup.zip</a>
<ul style="list-style-type: none"> <li>• unemployed</li> </ul>	<ul style="list-style-type: none"> <li>① Job centres listed through Directgov's search engine ⇒ <a href="http://los.direct.gov.uk">http://los.direct.gov.uk</a></li> <li>② Economically active unemployed residents ⇒ Census 2011 economic activity data on Nomis, <a href="https://www.nomisweb.co.uk/census/2011/qs601ew">https://www.nomisweb.co.uk/census/2011/qs601ew</a></li> </ul>
<ul style="list-style-type: none"> <li>• homeless</li> </ul>	List of hostels, supported housing, registered care, and temporary accommodation sites in Southwark ⇒ Vulnerable People Location document compiled by Southwark Council's Public Health Team
<ul style="list-style-type: none"> <li>• minority ethnic groups</li> </ul>	Number of residents from Asian / Asian British, Black / African / Caribbean / Black British, and Arab or other ethnic groups ⇒ <a href="http://www.nomisweb.co.uk/census/2011/lc2101ew">http://www.nomisweb.co.uk/census/2011/lc2101ew</a>

Section 2 continues on the next page...

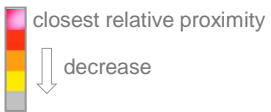
④ The fourth step was to **map** the datasets. This entailed making all the records in the datasets mappable by either extracting or creating the necessary co-ordinates (Eastings and Northings). For records relating to buildings, co-ordinates at address point level were used and for records relating to areas (i.e. parks and Census output areas) centroid co-ordinates were used. To better illustrate the geographical distribution of locations and vulnerable persons across the borough, two types of maps were produced:

- ① hotspot maps to show the **proximity** of locations or vulnerable persons to one another
- ② grid maps to show the **count** of locations or vulnerable persons per grid cell

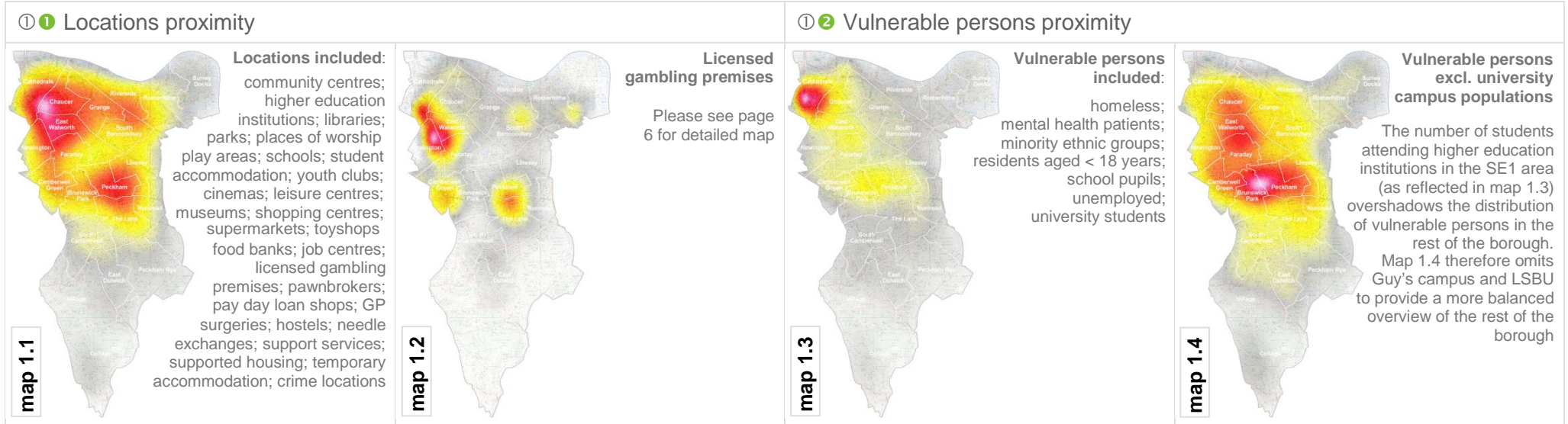
The distance used for measuring proximity and grid cell size is 600m. This distance is based on the upper-average of the distances measured between residents' homes and local facilities (post office, primary school, general store or supermarket, and GP surgery), as published by the **Department for Communities and Local Government**<sup>6</sup>.

Please see **sections 3** and **4** for maps as described above. The hotspot and grid maps on **page 5** provide a summary of vulnerable persons and locations in the borough. The map on **page 6** shows the combined vulnerable persons- and locations grid maps overlaid with the current licensed gambling premises in Southwark. The map on **page 7** is an example of a local area profile that will be provided by the council in response to a licence application.

### 3. Areas in Southwark of greater risk to gambling-related harm

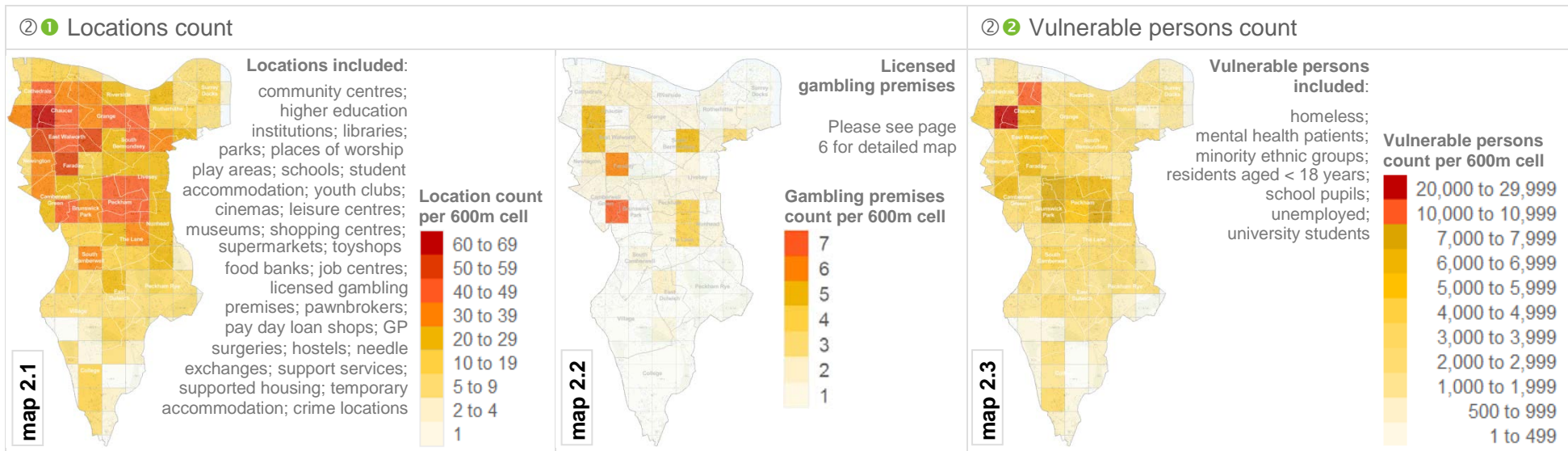
**proximity** based on 600m bandwidth  
 closest relative proximity  
 ↓ decrease

① Maps based on the **proximity** of ① locations and ② vulnerable persons in the borough



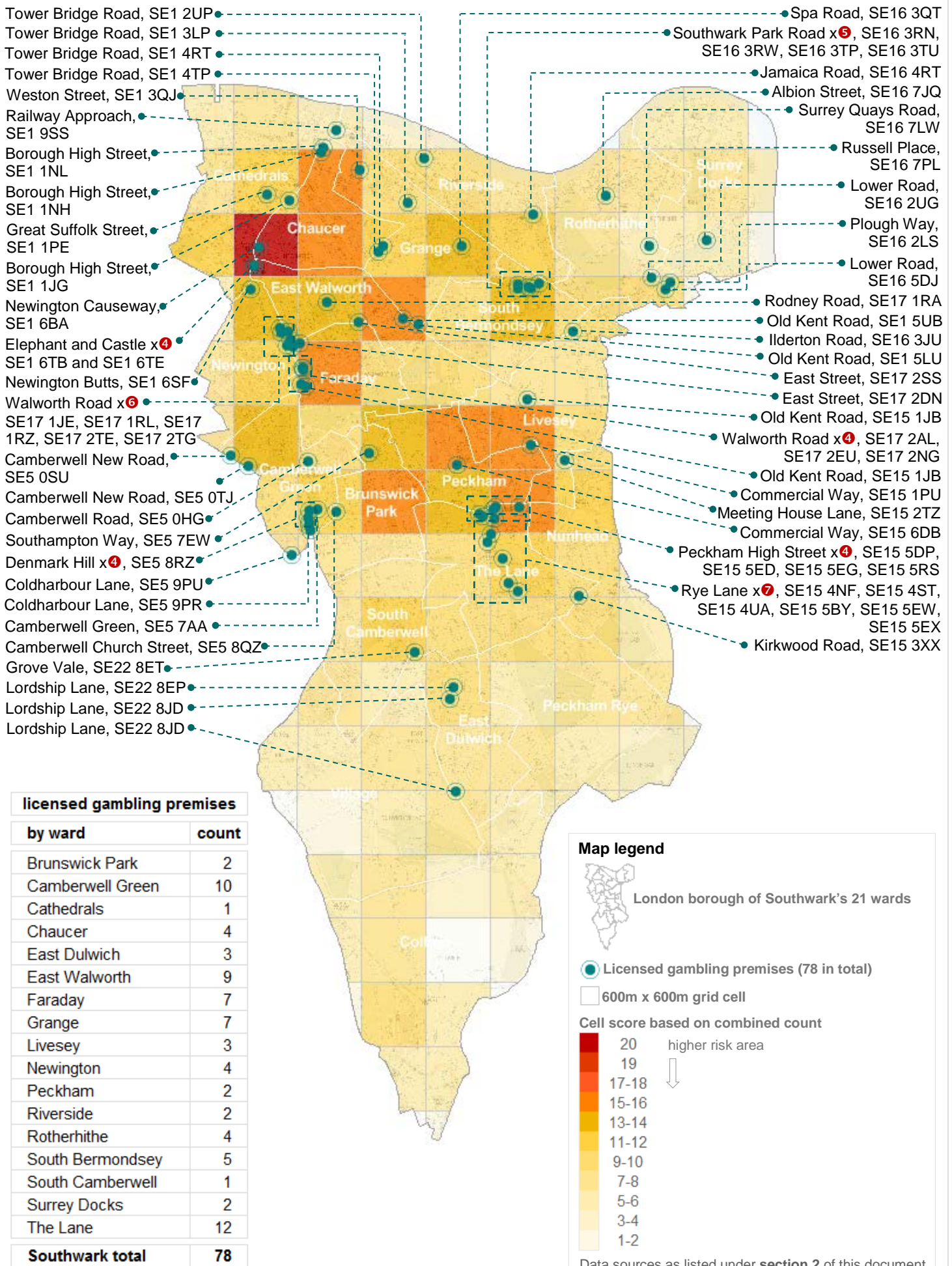
Data sources as listed under **section 2** of this document

② Maps based on the **count** of ① locations and ② vulnerable persons in the borough



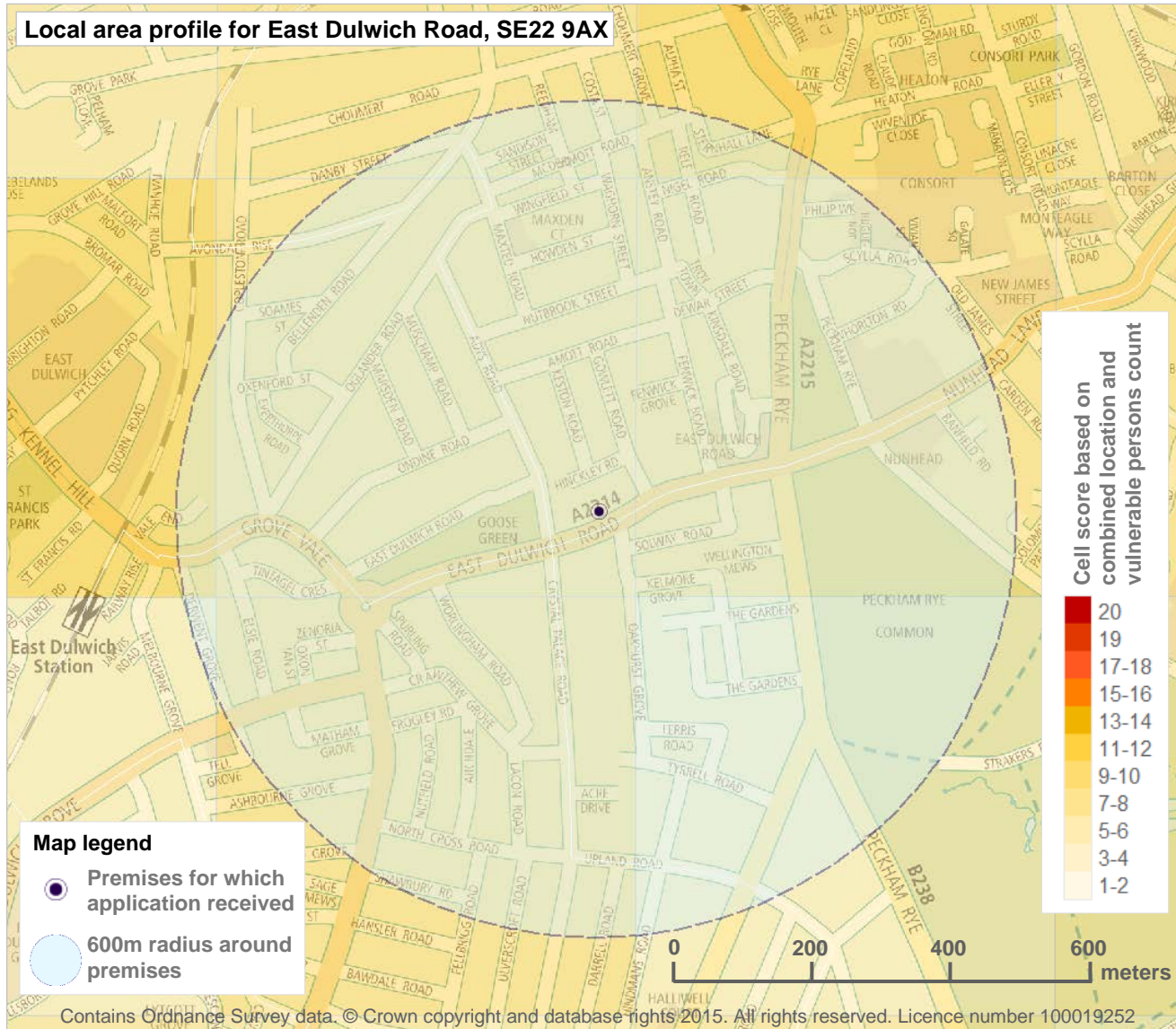
Data sources as listed under **section 2** of this document

**Map 3** Combined vulnerable persons and locations count overlaid with current licensed gambling premises



## 4. Implementation

Upon receipt of a gambling licence application, the licensing authority (Southwark Council in this instance) will provide a **local area profile** (LAP) relevant to the premises for which the application has been received. The profile will consist of a summary of the locations and vulnerable persons found within the **600m radius** of the premises. Based on this information, the council can make a more informed decision. Please see sample LAP below.



### Summary of 600m buffer area (including intersecting output areas)

- Cell score: 9
- Intersecting ward/s: The Lane, Peckham Rye, East Dulwich, South Camberwell

### Locations summary

#### Number of

- schools: 5
- play areas: 5
- parks / open spaces: 3
- leisure centres: 1
- places of worship: 4
- multi-use premises: 1 (community centre used for alcoholics anonymous and narcotics anonymous meetings, and for faith worshipping)
- toysthops: 1
- licensed gambling premises: 2
- crime reports relating to child sexual exploitation: 10
- crime reports relating to drug trafficking: 9

### Vulnerable persons summary

#### Number of

- pupils at local school/s: 1,732
- residents aged under 18 years: 2,353
- economically active unemployed residents: 496
- residents from minority ethnic groups: 4,073
- residents with poor mental health: 174

Contains data as specified under **section 2** of the 'Local area profiles for gambling licensing in Southwark' document

## References

- <sup>1</sup> Gambling Commission's Gambling Guidance for Local Authorities  
⇒ <http://www.gamblingcommission.gov.uk/for-licensing-authorities/GLA/Guidance-to-licensing-authorities.aspx>
- <sup>2</sup> Southwark Statement of Gambling Licensing Policy  
⇒ [http://www.2.southwark.gov.uk/download/downloads/id/13142/southwark\\_statement\\_of\\_gambling\\_licensing\\_policy\\_2016-2019](http://www.2.southwark.gov.uk/download/downloads/id/13142/southwark_statement_of_gambling_licensing_policy_2016-2019)
- <sup>3</sup> Gambling Commission's Licence Conditions and Codes of Practice (LCCP)  
⇒ <http://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/LCCP/Licence-conditions-and-codes-of-practice.aspx>
- <sup>4</sup> Gambling Act 2005  
⇒ [http://www.legislation.gov.uk/ukpga/2005/19/pdfs/ukpga\\_20050019\\_en.pdf](http://www.legislation.gov.uk/ukpga/2005/19/pdfs/ukpga_20050019_en.pdf)
- <sup>5</sup> Exploring area-based vulnerability to gambling-related harm: Who is vulnerable?  
⇒ [http://transact.westminster.gov.uk/docstores/publications\\_store/licensing/final\\_phase1\\_exploring\\_area-based\\_vulnerability\\_and\\_gambling\\_related\\_harm\\_report\\_v2.pdf](http://transact.westminster.gov.uk/docstores/publications_store/licensing/final_phase1_exploring_area-based_vulnerability_and_gambling_related_harm_report_v2.pdf)
- <sup>6</sup> English Indices of Deprivation 2015 File 8: Underlying indicators  
⇒ [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/467775/File\\_8\\_ID\\_2015\\_Underlying\\_indicators.xlsx](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/467775/File_8_ID_2015_Underlying_indicators.xlsx)