GAMBLING LOCAL AREA PROFILE
SPATIAL ANALYSIS REPORT

Exploring area-based vulnerability to gambling related-harm:

Developing the gambling-related harm risk index

January 2025

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Executive Summary

Background

In Great Britain, there is a changing gambling policy and regulatory environment which has increased focus on risk. Local area risk assessments have been introduced into the Gambling Commission's updated Licensing Conditions and Codes of Practice with understanding local risk, and taking appropriate steps to mitigate risk, being highlighted as a key concern.

Aims of the Analysis

The analysis aimed to explore and document what different types of harms arise from gambling, and who may be at greater risk of harm, explore and document who are the City of London's most vulnerable groups, and provide the basis for an informed and astute led approach in decision making.

Our Approach

The City of London's very unique demography resonated with our stakeholders who confirmed the long-standing knowledge that those working in jobs that involve high-level financial risk (executives, traders and financial advisors) are at a greater risk to gambling-related harm.

The introduction of smart phone technology and the installation of gambling applications has engaged a higher volume of users. It's anonymous, hence being regarded as a hidden addiction. Those who are gambling on-line are often professional males aged between 18-35[1] years old who are in uncontrolled environments where warnings and control is limited, and often during working hours.

Children now regularly see gambling advertising and the number of gambling commercials on British TV has increased exponentially since the Gambling Act 2005 came into force in September 2007.

Consequences of this are two-fold:

- The harm it causes to the gambler themselves, their employer, their colleagues, family, extended family, friends, and the community.

- The cost it causes to the UK Government in health care, welfare, housing and to the criminal justice system.

The City of London's transient workforce, those working on the plethora of construction sites around the city are not immune to gambling-related harm. We have no direct evidence to support this however, it would be remiss not to at least remark on this situation.

Implications

When reflecting on who may be vulnerable to gambling-related harm, a holistic approach needs to be taken as personal circumstances of each individual are not known.

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[1] EPIC Risk Management

Therefore, for the groups outlined in this analysis, it does not mean that everyone with those characteristics *will* experience harm rather that based on these characteristics there is an increased risk that they *may* experience harm.

There are likely to be multiple and complex risk factors for harm, with some people having multiple characteristics of potential vulnerability.

Limitations

This analysis is constrained by actual evidence. Therefore, some risk factors, groups or themes may have been overlooked (such as minority ethnic groups) where we had very limited available data and therefore have not so far included them to date.

The specific aim was to assemble an authentic 'Local Area Profile' which underpins the basis for an informed and astute led approach in decision making for the City of London Licensing Authority.

1. Introduction

1.1 Overview

National gambling policy and regulatory authorities have an increasing focus on risk, and to date, there has been very little examination of who is vulnerable to gambling-related harm, how these people can be identified and what might be done to protect them.

This report has been formed from a specific undertaking to explore area-based vulnerability to gambling-related harm within the City of London. It is now compulsory for all industry operators to undertake local area risk assessments to investigate the risks gambling venues pose to the licensing objectives.

The focus on vulnerable persons and harm comes directly from the licensing objectives set out in the Gambling Act 2005, which states that children and vulnerable people should be protected from being harmed or exploited by gambling.

New code provisions covering risk assessments and local authority profiles came into effect from April 2016.

2. Background

2.1 The Gambling Act 2005 gives Licensing Authorities responsibility for issuing premises licences for gambling venues. The advice contained within the Act is that Licensing Authorities should 'aim to permit' premises licences as long as applications are reasonably consistent with the following objectives:

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

These changes can be summarised into three broad areas:

- Increased focus on risk and regulation;
- Greater attention to local area risk, and;
- Encouragement of partnership and collaboration between stakeholders to mitigate risk.

2.2 Aims of the Analysis

- Explore and document what different types of harms arise from gambling, and who may be at greater risk of harm;
- Explore and document who are the City of London's most vulnerable
- Provide the basis for an informed and astute led approach in decision making.

3.   City of London

3.1   Overview

The City of London is also known as the 'Square Mile', and is the financial district and historic centre of London. It is one of 33 areas with local authority responsibilities into which London is divided. Administratively, London is divided into 32 boroughs and the City of London.

The City Corporation has a special role and wide remit that goes beyond that of an ordinary local authority with three main aims:

- to support and promote London as the world's leading international financial and business centre and attract new business to the capital and the whole UK.
- to work in partnership with local communities to increase skills, employment and opportunities for all Londoners, including through the City Bridge Trust.
- to enhance the capital as a hub of culture, history and green spaces for Londoners – residents, workers, and visitors.

The residential population of the City of London is approximately 8,600 people. The daytime population of the City increases significantly, with approximately 615,000 people commuting into the City each week for work. Additionally, a transient labour-force increases the number of commuters to the city working on the many building/construction sites.

In addition to the above over 18 million tourists visit London every year, many to see the popular attractions in the City of London which include St Paul's Cathedral, the Monument to the Great Fire of London, Guildhall Galleries, the Barbican Centre and the Museum of London.

The city also has a high density of bars & restaurants and markets including the historic Leadenhall Market and Petticoat Lane.

4.   Developing the risk index models: theoretical basis

4.1   Overview

The Licensing team at the City of London conducted research to establish the theoretical and first-hand basis for our risk-index models. Our stakeholder consultations have comprised of the following approaches: :

1. Stakeholder consultation survey
2. Stakeholder face to face interviews

4.2   Methods

4.2.1   Stakeholder Consultation Survey

To develop the theoretical basis of our risk models, we ascertained which types of people were viewed as vulnerable to, or at risk of, gambling-related harm, taking note of the responses in our stakeholder consultation survey.

4.2.2 Stakeholder Consultation face to face Interviews

Face to face consultation interviews have also been conducted with a diverse range of key stakeholders within the City of London who were identified and approached purposely from those who had experienced the effects of gambling-related harm first hand.

4.3 Definitions

Before considering the evidence relating to who is vulnerable to, or at risk of, gambling-related harm, the following definitions apply.

4.3.1 Gambling-related harm

Gambling-related harm can be defined as:

"The adverse financial, personal and social consequences to players, their families, and wider social networks that can be caused by uncontrolled gambling." [2]

4.3.2 Problem gambling

Problem gambling (or ludomania, but usually referred to as 'gambling addiction' or 'compulsive gambling') is defined as:

"An urge to gamble continuously despite harmful negative consequences or a desire to stop." [3]

4.3.3 Nature of harms

The following represents the nature of harms to individuals which can be broadly grouped as follows:

- Detriments to the person's health, both morbidity and mortality
- Emotional or psychological distress
- Financial difficulties, diverted financial resources, bankruptcy or reduction of financial situation
- Reduced performance / loss of role at employment or study
- Relationship conflict or breakdown.
- Criminal activity. While a rare outcome of gambling problems, entering the judicial system creates acute harm to individuals as well as the community. This includes (but is not limited to) incarceration, along with psychological harms of shame and stigma.
- Harm to family and friends (in terms of the partner (or spouse) and the children of people with gambling problems)
- Harm to the community (self-reported missed work, levels of debt, proceeds from crime, and costs to the judicial system and welfare system).
- Indirect harm to the community (poverty, poor health, lower levels of social and human capital)

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[2] Responsible Gambling Strategy Board - 2009

[3] Helpstopgambling.org

- Financial loss to the community (loss of money from the community or the transporting of harm – on-line gambling)

4.3.4 Who can be vulnerable to gambling-related harm?

The Gambling Commission has stated that whilst they did not want to explicitly define who vulnerable people are, this is likely to include people who gamble more than they want to.[4]

The following represents those persons who can be vulnerable to gambling-related harm:

- Young people (youth)
- Students
- Those with Mental Health problems
- Those afflicted with substance use/misuse issues
- Those with learning disabilities / difficulties
- Immigrants
- Ethnic minorities
- Homeless people
- Those living in constrained economic circumstances
- Those living in deprived areas
- Prisoners
- Older people
- Those with personality / cognitive impairments
- Women potentially vulnerable to harm
- Other groups/people

4.4 Gambling-Related Harm

Extracted from our stakeholder consultations the following is a generic representation.

4.4.1 Stakeholder perspective: What different types of harms arise from gambling?

As with the list overleaf outlining the nature of harms to individuals our stakeholders echoed the same views; however, the fundamental element delineated is the ancillary harm impacting families and communities in particular:

- Crime (funding a gambling addiction)
- Child abuse
- Domestic violence
- Deterioration of family relationships, marriage breakdown
- Employability (loss of job/career issues)
- Family personal safety (debt with lenders)
- Financial stress
- Health issues (nutrition and general wellbeing including lack of sleep)
- Homelessness (rent is not paid or is in arrears), and dependents including children being made homeless

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[4] Gambling Commission 2012

- Reputation and brand loss to an organisation including legal implications
- Social isolation.

4.4.2 Stakeholder perspective: Who do these harms affect?

Mostly our stakeholders established that the individual/person who is significantly affected is the gambler themselves, followed by their family (especially children), extended family and friends, employers/colleagues, broader social network, and the community.

The detriment to the individual gambler extends to anti-social behaviour, including compulsive lying, bullying, and the extreme where the individual has self-harmed or tragically committed suicide.

4.4.3 Stakeholder perspective: How might harms vary from person to person?

The consensus portrayed by our stakeholders characterised that harm varies from person to person dependent on personal circumstances, and they range from:

- The type of gambling
- The support offered by family
- The severity of the addiction
- The culture and acceptance of gambling
- The gamblers emotional wellbeing (depression or low self-esteem)
- The gamblers mental health (unable to make informed or balanced decisions)
- The gamblers individual character (tendency towards anxiety or stress)
- The gamblers income (high income earner or receiving benefits)

4.4.4 Stakeholder perspective: Over what time frame might harm be experienced?

Individuals can become pathological instantaneously, or within a few weeks or even years. Some individuals can take over a decade or even a lifetime.

Regrettably gambling is a hidden addiction and therefore often goes unnoticed. However the time frame that gambling-related harm is experienced is wide-ranging and this can also be attributed to the personality of the gambler, and whether or not it is an entrenched behaviour.

4.5 Vulnerable people

Extracted from our stakeholder consultations the following is a generic representation.

4.5.1 Stakeholder perspective: Identifying vulnerability

Vulnerability has many components, and can be identified with many causes contributing to being categorised as being vulnerable.

Predominantly our stakeholders implied the following risk factors which can all be identified through assessment, behaviour and observation:

- Those individuals who have an addictive personality.
- Those with lower levels of education.
- Those from deprived or poorer communities.

- Those with fewer psychological coping resources or those being manipulated or controlled either physically, mentally or emotionally.
- Those who have difficulties in coping with daily living, and the absence of an adequate support structure around them.
- Those who need support or protection because of age, learning difficulties, mental health, mobility issues, or with a disability.
- Those with an alcohol or substance abuse dependency.

4.5.2 Stakeholder perspective: Who is vulnerable to gambling-related harm?

Largely 'everyone' is vulnerable to gambling-related harm, particularly anyone who is related to the gambler (spouses, partners, extended family and friends).

4.5.3 Stakeholder perspective: Which groups are most vulnerable to gambling-related harm?

The clear majority of our stakeholders specified that the group most vulnerable to gambling-harm were young people/children trailed by the gambler themselves which appears to be more men than women. Furthermore, their partner/spouse, immediate family, and friends.

5. Developing the risk index models: modelling and spatial analysis

5.1 Introduction

The datasets, data sources and statistics used to collate the City of London spatial analysis are representative of the best and most recent local data available to signify the risk factors identified, some of which have multiple datasets.

5.2 Characteristics of vulnerability

The following characteristics considered for inclusion in the City of London model were those with supplementary evidence to support each one at this time, however the models will be regularly reviewed and amended to take into account varying factors.

Risk factor: problem gamblers seeking treatment

Dataset used: *GamCare counselling locations and Gamblers Anonymous Meetings*

These locations are derived from the lists sourced from GamCare and Gamblers Anonymous website. These locations indicate the places where people with gambling problems will be visiting and hence bring those potentially vulnerable groups to these locations.

Risk factor: crime, individuals gambling illegally in the streets

Dataset used: *City of London Police Crime Statistics*

This dataset is capturing information about individuals who have been caught gambling illegally in the streets.

Risk factor: crime, including theft/robbery, and stealing from employers

Dataset used: *City of London Police Crime Statistics*

This dataset is capturing information about individuals who have either been caught stealing, and employees committing theft from Gambling Licensed Premises, and theft from Automatic Teller Machines (ATM's) located within Gambling Licensed Premises.

Risk factor: crime, including criminal damage

Dataset used: *City of London Police Crime Statistics*

This dataset is capturing information about individuals who have committed a crime relating to criminal damage.

Risk factor: crime, involving employee fraud

Dataset used: *EPIC Risk Management*

This data represents those working in the financial sector who have access to company money (expense accounts, credit cards and client money).

Risk factor: individuals using hand-held devices during work hours

Dataset used: *EPIC Risk Management*

This data is used to represent that it is a known fact that gambling is now 24/7, anonymous, and engages a higher volume of users, specifically professional males aged between 18-35[5] and working in the financial sector who are in uncontrolled environments.

Risk factor: those with financial difficulties and or debt

Dataset used: *location of payday loan shops, loan sharks, and pawn brokers*

This dataset represents locations where those with financial difficulties and debt problems are more likely to be present, accessing credit through less secured means.

Location of food banks and soup kitchens

This dataset aims to model financial difficulties and debt problems, through places where people are so severely impoverished that they cannot afford to buy food.

Risk factor: homelessness

Dataset used: *The location of homeless accommodation and City of London supported housing*

There are limited accommodation provision types for the homeless within the City of London with the majority of hostels being outside the 'Square Mile'.

Risk factor: people with poor mental health

Dataset used: *Mental health services and mental health care facilities*

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[5] EPIC Risk Management

Capturing accurate information about people with poor mental health is difficult and we acknowledge limitations with this, however we believe that there is sufficient, albeit a conservative measure of poor mental health within the City of London.

Risk factor: people with substance abuse or misuse problems

Dataset used: *Drug and alcohol treatment and recovery centre clinics and clinics within GP surgeries and needle exchanges*

As with problem gambling treatment locations, these clinics are likely to attract potentially vulnerable people to these locations. This data set is an amalgamation of an internal list supplemented by web searches.

Risk factor: youth

Dataset used: *number of residents aged 10-24years*

The age range of 10-24 has been selected based on the interpretation of the evidence including 'emerging adults' as well as younger children in 'transitional life stages'

education institutions with students of 13-24 years

This data is a list of all known educational institutions for people aged 13-24 and are derived from a current Local Authority list, and as such can be considered a reliable source.

These locations have been included as they represent areas where younger people will be present in greater numbers at certain points of the day

6. The changing environment of gambling

6.1 The gambling landscape has changed exponentially in the past 20 years due to on-line/internet gambling – hand-held technology has spawned a whole new customer base.

Gambling is now 24/7, anonymous, and engages a higher volume of users. 32 million gaming accounts are now registered online with an estimate of up to 12 million users.[6]

Recent statistics show that 25% of the population will gamble online at least once a month[7]. However, the most alarming statistic is that 12% of under 18s have claimed to have gambled online [8]. The most predominant demographic however remains professional males aged between 18-35 years old[9] who invariably are in uncontrolled environments where warnings and control are very limited.

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[6] Statista – March 2022

[7] Xace – May 2023

[8] National College – Young People & Gambling Survey 2019

[9] EPIC Risk Management

The 'hidden' gambling landscape is the damage to company profitability, branding and reputation, particularly where clients are involved. Criminal acts involving gambling particularly in the financial services sector is increasing, and figures recently released indicate that gambling fraud is now responsible for 12.5% of all frauds in the United Kingdom.[10]

Television gambling advertisements have risen 600% from 234,000 to 1.4m since the Gambling Act 2005 came into force .[10] These advertisements produced 30.9bn 'impacts' – i.e. the number of times a commercial was seen by – and reach 6 out of 10 of all viewers. Gambling advertising on social media has also increased as the gambling industry owns a 'freedom' on the internet that it has never been able to fully realise in the actual, physical world.

7. The Local Area Profile of the City of London

7.1   Introduction

The City of London is the financial district and historic centre of London. It is one of the 33 areas with local authority responsibilities into which London is divided. Administratively, London is divided into 32 boroughs and the City of London.

The City of London has a unique demography with a relatively low residential population but an estimated weekly working population of approximately 615,000. The City is the only area in the United Kingdom in which the number of workers significantly outnumber the residents.
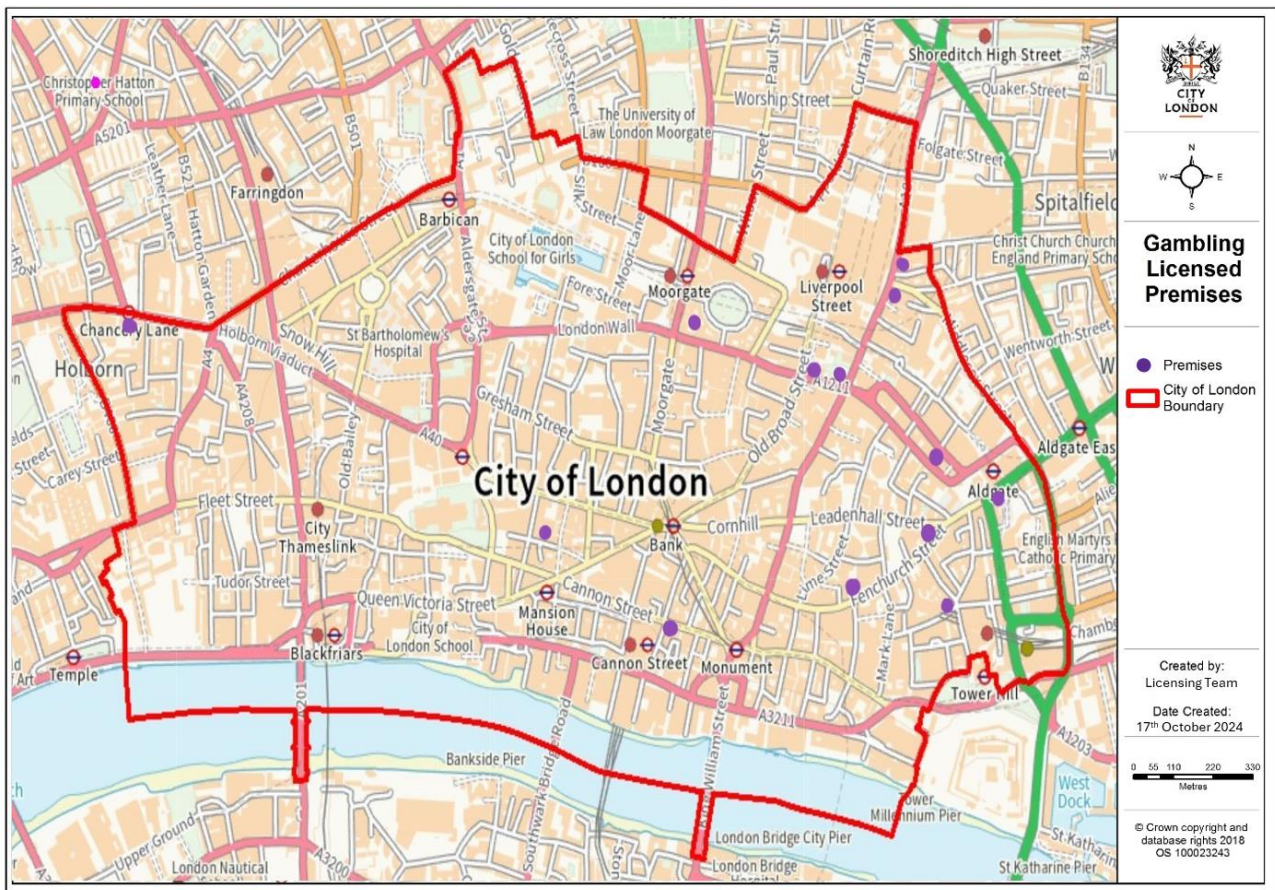
Additionally, over 18 million tourists visit London every year many of which visit the City of London as they acknowledge that the City is home to many popular attractions including St Paul's Cathedral, the Monument to the Great Fire of London, Guildhall galleries, Barbican Centre and the Museum of London.

7.2   Gambling premises

Gambling Premises have dramatically reduced in the last decade in the City of London with only 12 currently licensed (11 Betting Shops & 1 Bingo Club) . The majority of gambling premises are situated in the eastern half of the city.

The map on the following page provides an Overview of all current licences within the City of London.

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[10] Ofcom Research - 2013

7.3 City of London's 'hot spot' affected most by gambling-related harm

Although gambling is a legal entertainment activity it has been recognised that if you work in the financial services industry, you are at a greater risk of developing a gambling dependency than other professions. It is estimated 1 in 30[11] employees in the financial services sector are suffering from a gambling addiction.

Coincidently our stakeholders also confirmed that those working in the financial services sector are at a greater risk of developing a gambling addiction – it is now the most prevalent sector in the United Kingdom and rising.

Those who work in the financial services sector are commonly highly intellectual including executives, stock market traders and financial advisors who are gambling whilst at work. There are several common denominators which is intrinsically linked including:

- Adrenalin driven
- Thrill seekers
- Risk takers
- Optimistic outlook
- Competitive

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[11] National Problem Gambling Clinic

The area east of the City of London is most likely to be affected by gambling-related harm, due to the cluster of current licences in the east of the City of London, and the hub of the financial district.

7.4   GamCare & GambleAware Statistics

The information above is evident in the statistics provided by GamCare & GambleAware.

In 2016/17 GamCare recorded 40% of HelpLine and NetLine calls, and during this time received calls from 400 people with a postcode in the City of London. Trying to access updated stats via GamCare London. 0207

Additionally, GamCare were able to provide face-to-face counselling for 5 people registered within the City of London from their Clapham Junction offices, and an additional 41 clients at their Liverpool Street location (an overall increase from the previous year).

Gambleaware stats show that City of London has a lower proportion of people experiencing potential harm than the national average. However over 60% of those that have accessed support services are in the highest category of defined problem gambling.

Furthermore, the proportion of 18-34 year olds and people from minority ethnic groups suffering with high-levels of problem gambling is actually higher than the national average. The annual fiscal cost of problem gambling to the City is estimated to exceed £168 million.

7.5   Evidence review – who are the City of London's vulnerable groups?

Extracted from our stakeholder consultations, the Gambling Commission's survey and the evidence obtained from our various datasets, the following is a generic representation of those areas that put people most at risk of gambling-related harm within the City of London.

- Those individuals who are affected by an alcohol misuse/addiction.
- Those individuals who are affected by a drug, and or substance misuse.
- Those individuals who are homeless and sleeping/living rough on the streets (huddles of homelessness within the City of London include Liverpool Street, Tower Hill, Fleet Street, and the Barbican Estate).
- Those individuals who have low educational attainment and learning and intellectual functioning difficulties.
- Adults with mental health issues, depression, anxiety, and low self-esteem.
- Those individuals who have become socially isolated.
- Those individuals who are on low incomes or have experienced financial difficulties (in debt), loss of job and even bankruptcy.
- Those individuals who work within the financial sector (typically executives, traders, bankers etc.)
- Children who have a parent who gambles and are unable to provide for day-to-day living expenses, and asylum seeking young people.
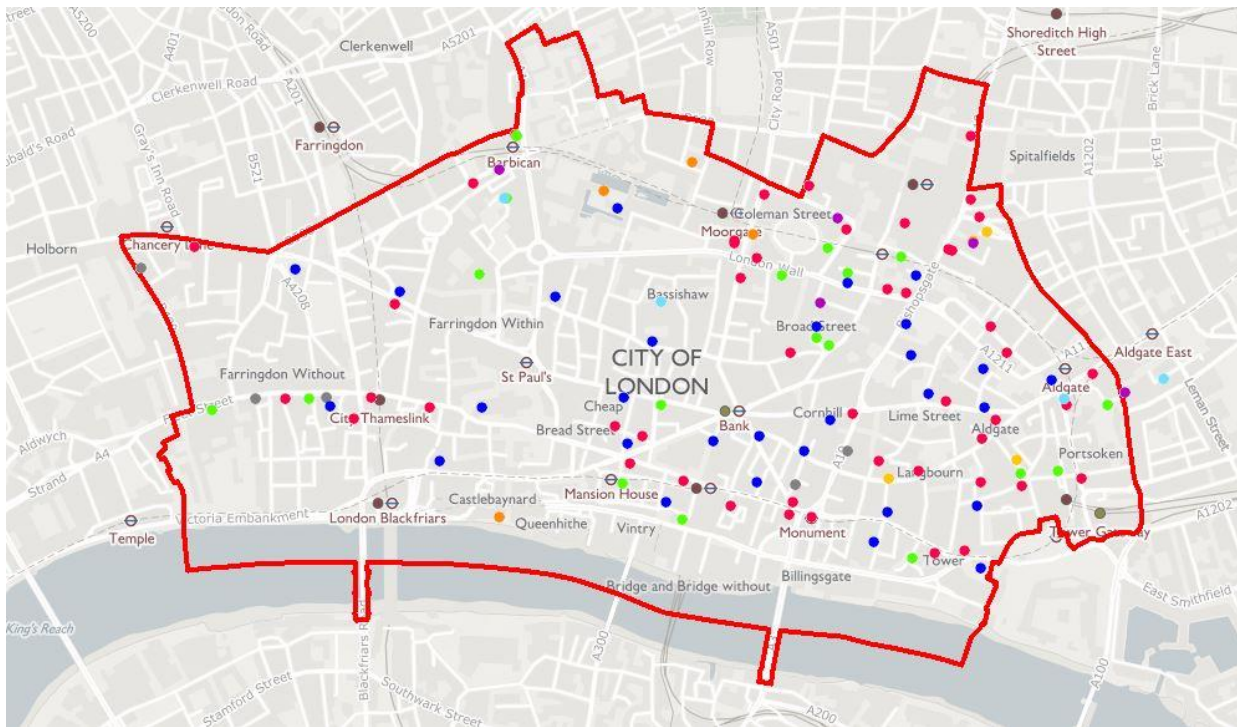
7.6   Local Area Profile Table

As outlined above the table below demonstrates which of the identified characteristics had first-hand evidence. The characteristics which are shaded in darker grey show where there was evidence to support that these characteristics are associated with a higher risk of harm.

Demographics	Socio-economic	Poor judgement /Impairment	Other
Youth	Unemployment	Low educational attainment	Poor mental health
Older people	Low Income	Low IQ	Substance abuse/
Women	Deprived areas	Under influence alcohol/drugs	Problem gamblers
Ethnic Groups	Financial difficulties/debt	Learning disabilities	Financial Workers
	Homeless	Personality Traits	
	Immigrants		
	Prisoners /probationers		

7.7   Demographic Profile

The City of London Licensing Authority has identified specific concerns and risks relating to gambling in the local area.

The map below provides an overview; however the full demographic profile has been visually mapped and can be found at Map Profile. Refreshed and additional data sets will be added as they become available.

● Addiction Support

● Education Establishments

● Financial

● Gambling Licenced Premises

● Healthcare Services

● Homelessness Support

● Mental Health Support

● Religious Institutes

8. Summary

8.1   The City of London's very unique demography resonated with our stakeholders who confirmed the long-standing knowledge that those working in jobs that involve high-level financial risk (executives, traders and financial advisors) are at a greater risk to gambling-related harm.

The introduction of smart phone technology and the installation of gambling applications has engaged a higher volume of users. It's anonymous hence being regarded as a hidden addiction. Those who are gambling on-line are specifically professional males aged between 18-35 years old[12] who are in uncontrolled environments where warnings and control is limited, and often during work hours.[13]

Advertising is now seen regularly by a younger audience[13], and the number of gambling commercials on British TV has increased exponentially since the Gambling Act 2005 came into force in September 2007.

Consequences of this are two-fold:

- The harm it causes to the gambler themselves, their employer, their colleagues, family, extended family, friends, and the community.
- The cost it causes to the UK Government in health care, welfare, housing and to the criminal justice system.

The City of London's transient workforce, those working on the plethora of construction sites around the city are not immune to gambling-related harm. We have no evidence to support this, however it would be wrong not to at least remark on this situation.

8.2   How can we protect those vulnerable to gambling-related harm?

The majority of our stakeholders reacted by proposing that statutory safeguarding measures be imposed, additional support resources be available, and improved links with networks (family and other community) where appropriate.

Preventative technology, restricting financial transactions (high-stakes) for on-line gambling, paralleled with better education and reduced promotional material (TV, point-of-sale, street advertising), and additionally a fit for purpose at work policy, including a risk-register.

These are long term aspirations and mainly outside the control of the City of London Licensing Team. However, to assist licensees of gambling premises, a document providing guidance on undertaking gambling risk assessments has been produced. The document provides information on how and when a risk assessment should take place based upon the Gambling Statement of Principles and the information provided in this Local Area Profile.

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[12] EPIC Risk Management

[13] Ofcom research – 2013

Appendix A
Stakeholder Consultation Survey Questionnaire

Introduction

The Gambling Act 2005 (The Act) gives Local Authorities responsibility for issuing premises licences for gambling venues. The Act requires that Local Authorities should 'aim to permit' premises licences as long as they are consistent with three objectives, one being 'protecting children and other vulnerable persons from being harmed or exploited by gambling'.

In April 2024 the Gambling Commission (the Commission) introduced new provisions of a social responsibility code within the Licence Conditions and codes of Practice (LCCP), which require gambling operators to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate those risks. It is an update to existing national policy and is intended to provide a well evidenced and transparent approach to considering and implementing measures to address the risks associated with gambling.

This survey aims to assist the City of London fill this gap, and aim to map our results visually, so that areas of potential risks are highlighted. Our intention is that these results become a tool for when making a decision about the location of gambling venues, consider the needs of the local communities and enable the City of London to develop plans to protect vulnerable people.

We would be very appreciative if you could please take the time to complete this survey which should take 20-30 minutes. Please comment on your responses as appropriate in the areas provided.

The City of London Corporation is a registered data controller under the Data Protection Act 1998 (DPA), and will process any personal information provided by you in accordance with that Act.

By providing your information, you are confirming that you consent to your information being processed in this way. If you would like further information at any point, please contact Andre Hewitt, Licensing Officer on 0207 332 3406.

Section 1: Gambling related-harm

1. What does the term gambling-related harm mean to your organisation?
2. How does this differ from problem gambling?
3. Do these differences matter? If so, in what way?
4. What different types of harms arise from gambling?
5. Who do these different harms affect?
6. How might harms vary from person to person?
7. Over what time frame might harm be experienced?
8. Can you please identify what area/location within the City of London you know is affected most by gambling-related harm.

Section 2: Vulnerable people

9. How would you identify vulnerability?
10. What does the term 'vulnerable people' mean to your organisation?
11. In respect of your answer to Question 10, what type of vulnerable groups interact with your organisation?
12. In respect of your answer to Question 11, what measures might be used to protect vulnerable people?

13. In respect of your answer to Question 12, which groups specifically?
14. Who would you consider to be vulnerable to gambling-related harm?
15. Are these groups different to those who are vulnerable to gambling problems?
16. In respect of your answer to Question 15, why is that? Is this evidence based?
17. Which groups do you think are *most* vulnerable to gambling-related harm?
18. What are the characteristics that suggest someone is vulnerable to gambling-related harm?
19. How do you think the characteristics of who is vulnerable have changed over the last 10 years?

Section 3: Other

20. Do you think there is a conflict between the local authority's function under The Gambling Act 2005 in aiming to permit licences and the objective of protecting vulnerable people? Which should take precedence and why?
21. Is there anything else you would like to add on this topic?

Thank you for completing this survey.

22. Could you please indicate below the capacity in which you are making your comments?

□   Gambling Care Provider

□   Community Service Provider (including Police & Fire Brigade)

□   Drug and Alcohol Treatment Provider

□   Education Provider

□   Financial Advice Provider

□   Healthcare Service Provider (including GP Surgery's & Hospitals)

□   Homelessness Support Provider (including accommodation)

□   Mental Healthcare Service Provider

□   Religious Establishment

□   Other (please specify)