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Ms Valerie Curtis
CAP Secretariat
c/o Dept. Culture Media & Sport
2-4 Cockspur Street.
London SW1Y 5DH

Dear Ms Curtis,

**Supplementary information
Manchester City Council's EiP 7th September 2006.**

Responsible Gambling

I have been advising Manchester City Council (MCC) on matters of social responsibility since 2004, and wish to comment on the work coordinated by MCC relating to problem gambling.

My involvement in the issues concerning the social impact of gambling spans 25 years and includes founding and running the UK Forum on Young People and Gambling and GamCare. I now act as a consultant on social responsibility to the DCMS, the Gambling Commission and all sectors of the gambling industry. I have worked with, and advised on, problem gamblers and am author of the book "Understanding problem Gamblers." Currently I am chairman of The Society for the Study of Gambling and a trustee of the Gordon House Association. A short biography is attached.

When approached to assist MCC in their bid for the regional casino licence, I was immediately impressed by their determination to set up a Responsible Gambling Unit (RGU) regardless of the outcome of their application for a regional casino license. There is no doubt in my mind that the RGU, with its Manchester-wide focus, will complement national provision and will make an immense contribution to encouraging responsible gambling and effectively tackling problem gambling. This would not only help redress any adverse consequences of a regional casino development but will certainly make a positive contribution to minimising the harm of Manchester's existing gambling provision.

The fact that the RGU will be part of the Chief Executive's department and overseen by a Community Trust comprising a wide range of local organisations, should ensure its independence and broad acceptance as part of the area's response to social issues. Close working partnerships with MCC's Licensing Unit, and with organisation such as the Joint Health Unit and Social Services Department will allow the RGU to coordinate a strategic approach for the area. To date, the social impact of gambling has not been a priority issue for the NHS. The presence of an RGU will undoubtedly raise the profile of gambling in Manchester's public health agenda and this is to be welcomed.

According to reports I have seen MCC already has an impressive track record of delivering education projects relating to public health, such as those relating to smoking cessation and alcohol awareness. This reputation augers well for the RGU's core objective to establish responsible gambling education programmes and public awareness campaigns. The latter has never yet been done in the UK, and with the current level of ready availability and accessibility of gambling it is long overdue. It is, therefore, pleasing and timely that the RGU intends to carry out such a campaign.

A second objective of the Unit is to commission problem gambling prevention, treatment and support services. This very closely follows the national strategy of GamCare and their primary funding agency the Responsibility in Gambling Trust (RIGT), in that they are developing a number of partnerships in order to ensure there is adequate provision across the UK. The RGU, with linkages to relevant service providers in the area and access to expertise in counselling, will therefore assist national coverage in providing services to a significant percentage of the population.

A third objective of the RGU is to coordinate resources and manage, in conjunction with MCC's Licensing Unit, a monitoring and evaluation service. Both from a local and national perspective it is vitally important to measure both the positive and negative social impacts of the regional casino and all other gambling activity. This again underscores the value of the RGU in complementing the periodic national gambling prevalence studies that will be commissioned by the Gambling Commission, and other national research commissioned by RIGT or other bodies. In my view, well researched data is

essential if we are to be able to develop effective policy, appropriately target services and resources where they are most needed, rebut hysterical and ill informed opinion about the impact of gambling and ensure that education awareness, harm minimisation and treatment services are effective and relevant.

Much has been made, rightly so, of Manchester's very pressing need for regeneration and the co-existence of a robust market catchment area. Yet the overall demographic makeup of the Manchester area is remarkably similar to that of the UK. With a careful and comprehensive regime of monitoring and evaluation coordinated by the RGU, this area will become an ideal test bed for the regional casino and it will be well within the means of the RGU, by drawing upon the wealth of evaluation experience within Manchester, to measure the impact of a regional casino - as well as to provide valuable information about the impact of gambling in general. The City Council will use the RGU to both help deliver on its regeneration aims, and to measure this success very clearly.

The forth objective of the RGU will be to monitor the compliance of gambling operators with the licence conditions. This will be achieved in close partnership with the Licensing Unit. In my opinion the whole credibility of the Gambling Act 2005 rests on establishing demonstrable evidence that the gambling operators comply with the social responsibility conditions of their licence. Consequently, the RGU's ability to focus on gambling activities in the Manchester area will help ensure a very good overall standard is maintained and, in all probability, higher than other areas where there is no specific systematic focus on compliance.

A further advantage in setting up a specific unit to focus on the social impact of gambling is that it enables national and international research to be coordinated. Latest best practice will be fed into the activities of the RGU, and in turn the Unit expects to positively contribute to the national and international debate and body of knowledge in this field.

An aspect of research worth mentioning is that it increases understanding as to how the gambling industry works and how those who wish to gamble respond to what is on offer. In turn this informs all stakeholders as to 'what works' both in relation to helping gamblers stay in control of what they are doing and in terms of operators applying mandatory codes of practice. In my opinion Manchester's approach increases the chance of achieving an appropriate balance between commercial opportunity and social responsibility.

It is significant that MCC's proposals for the RGU have been welcomed by operators of both betting and casino operations in the area. Considering the fees and contributions that will be expected of operators under the new Act it is somewhat remarkable that the larger companies already approached have indicated a willingness to help fund the RGU. Such contributions, coupled with funding from other identified sources, gives me confidence that the Unit will meet its implementation target of 2007.

The social impact of gambling cannot, however, be taken in isolation. I am aware of the considerable research that MCC has undertaken during the bid process to create an accurate picture and argue the case for hosting the regional casino. The positive and negative social impacts of gambling do interrelate with wider employment and regeneration issues. It is my understanding that the interconnection of all the relevant strands helped formulate initial thinking about the need for a coordinating unit. It is this belief in interconnectivity that underpins the role of the RGU and provides a framework for its work to integrate with other local and national initiatives. This work is a testament to the exemplary leadership role of Manchester City Council, and is the only genuine attempt to join up the powers of planning, licensing and community well-being around gambling policy at a local level.

Manchester's responsible gambling policy is shortly to be widely disseminated for public consultation. Consultations will also be held with stakeholders and gambling industry personnel. This approach will help fine tune the responsible gambling policy and help shape the approach of the RGU.

Informal consultation with individuals and organisations with an expertise in problem gambling around the Manchester area has already taken place, both by the Licensing Unit in advance of the publication of its gambling licensing policy, and by MCC itself to develop thinking around how to establish the RGU. This work has also served to map out the current and potential provision of services. Among those consulted included the city's drugs and alcohol strategy team, the Director of the School of Behavioural Sciences at Manchester University, many experts within local government in the fields of social work, debt and addiction counselling, representatives of local faith communities and Greater Manchester Police. As the formal consultation now begins, the City Council is in a good position to build upon such contacts.

My input into the development of the RGU and the work it will undertake will continue. I welcome the opportunity to assist the City Council create this unique and valuable core aspect of its overall strategy that, in my professional opinion, epitomises the spirit of the licensing objectives on gambling and increases the chance that they will be successfully achieved.

Yours sincerely,

Paul Bellringer OBE
Director
Responsible Gambling Solutions Ltd.

October 2006.