

Enfield Gambling Local Area Profile

Introduction and Background

Responsibilities under the Gambling Act 2005 and associated guidance

The Council is the licensing authority under the Gambling Act 2005 (the Act) and is responsible for issuing premises licences and permits for gambling venues. When the Council exercises its functions in respect of gambling, it must have regard to the Act and its regulations, gambling codes of practice, the Council's Statement of Licensing Policy and the Gambling Commission's Guidance to Local Authorities (GLA).

The Act also requires the Council to 'aim to permit' gambling and therefore aim to issue premises licences if applications are reasonably consistent with the following licensing 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

In its GLA, the Gambling Commission recommends the approach the Council should take to gambling licensing and regulation. In September 2015, the Gambling Commission issued a revised GLA (5th edition) with many changes for licensing authorities that fall under three broad themes:

- increased focus on risk and regulation
- greater attention to local area risk, and
- encouraging partnership and collaboration between stakeholders to mitigate risk

In addition, changes to the Gambling Licence Conditions and Codes of Practice (LCCP) that took effect from 31 January 2024, require all industry operators to undertake local area risk assessments to identify the risks their gambling venues pose to the licensing objectives and to take into account the Council's Statement of Gambling Licensing Policy. Industry operators are also expected to provide these local risk assessments to the Council as part of any application.

The Council's Local Area Profile

To support the Council to give effect to these requirements and guidance the Council has produced a Local Area Profile (LAP). This LAP is intended to provide a clearer

understanding of the factors in the local area in Enfield and in terms of Enfield's population to provide gambling licence applicants and operators with a clearer understanding of the risks they will need to assess for when applying for and operating a gambling licence.

The Council's LAP will have a particular focus on matters relating to the licensing objectives for:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

To achieve this the LAP outlines data that is relevant to risks to children and vulnerable people, economically vulnerable people and crime and disorder.

1.2 What is a gambling local area profile?

A local area profile is an assessment of the key characteristics of Enfield in the context of gambling-related harm. The information obtained for the assessment helps to provide a better understanding of the types of people that are at risk of being vulnerable to gambling-related harm; where they are located and any current or emerging problems that may increase that risk. Our LAP will help us to develop our Statement of Licensing Policy and set out our expectations of operators of gambling premises.

1.3 Creating Enfield's local area profile

Although there is no legal requirement on the Council to complete a local area profile, we feel there is significant benefit for operators, our residents, business, visitors to Enfield and the Council to have an evidence-based awareness of the potential and actual risks of vulnerability to gambling-related harm.

In this context we have completed an assessment of the key characteristics of Enfield to identify areas of higher risk of vulnerability to gambling-related harm. In developing our local area profile, we have had regard to the research produced on the impact of gambling on vulnerable and economically vulnerable populations and on crime and disorder.

1.4 Our approach

To better understand the risks to Enfield in relation to gambling the LAP is divided into three sections:

- Risks to young and vulnerable residents;
- Risks to economically vulnerable residents; and,
- Prevention of crime and disorder.

In each section a summary of the key risks will be outlined and maps showing different aspects of risk against location and density of gambling premises will be provided. How these risks are likely to influence gambling policy in Enfield will also be outlined.

Additional factors that exacerbate risks

Three key factors that are identified in the academic research literature are exposure, proximity and density. These factors are particularly important in their impact on younger and more vulnerable people and in economically deprived areas.

In academic research literature identifies that opportunities to gamble tend to be higher in deprived areas (Evans and Cross, 2021 <https://www.abrdn.com/docs?editionId=c8d6f9b5-1c8b-4b97-9bb4-c3099938f737#:~:text=As%20of%20November%202020%2C%2021,in%20the%20least%20deprived%20decile.>). This is shown in the data and maps below for Enfield, with the highest concentrations of gambling premises being located in the most deprived areas of the borough, the areas which also have the highest levels of unemployment and households receiving Universal Credit. These premises also are shown to cluster in the most deprived areas, with higher density and proximity to the residents of these areas.

The research shows that proximity to higher density areas results in higher rates of gambling behaviours and harms suffered by residents. Residents living within 07 km of a gambling venue were twice as likely be problem gamblers as those living more than 3.1kms away (Pearce et al 2008). In particular younger people are affected by proximity and density, one study found that for 18-21 year olds the likelihood of developing gambling problems increased by 39% for every additional gambling premises inn their local area (Welte et al 2009).

With the data and mapping below this research outlines a number of areas for concern. In particular that exposure, proximity, and density have a significant effect on the ability of operators and the Council to implement the objectives set out in the act.

Gambling licensing objectives

Impact of new gambling premises

Understanding the impact of new gambling licenses in Enfield and in specific areas within the borough is important to determining the most appropriate approach for the Statement of Principles for Gambling in Enfield.

In terms of the Gambling licensing objectives it is primarily two of them that are affected by the location of gambling premises in the local area. These are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

The third objective relates more to the operation and practice of the licensed premises. This is:

- ensuring that gambling is conducted in a fair and open way

As a Local Area Profile this document focuses primarily on the first two. With proximity, density and vulnerability being the focus for the protection of children and vulnerable persons from being harmed or exploited by gambling. And with patterns and density of crime and anti-social behaviour being the focus for being a source, associated with or supporting crime and disorder.

Protecting children and other vulnerable persons

For the purposes of the LAP the analysis for this gambling licensing objective will focus on vulnerable residents (including young people and adults who are vulnerable due to situation, health status and age) and on those who are economically vulnerable (those who are unemployed, in receipt of Universal Credit and those living in deprived areas).

Research evidence shows that people who on a low income, have a low level of educational attainment, are part of an ethnic minority or are young are more susceptible to gambling related harm.

Preventing gambling from being a source, associated with or used to support crime and disorder

For the purposes of the LAP this area of data and analysis will focus on anti-social behaviour, burglary, robbery and assault. This will help to inform any measures taken to promote this objective.

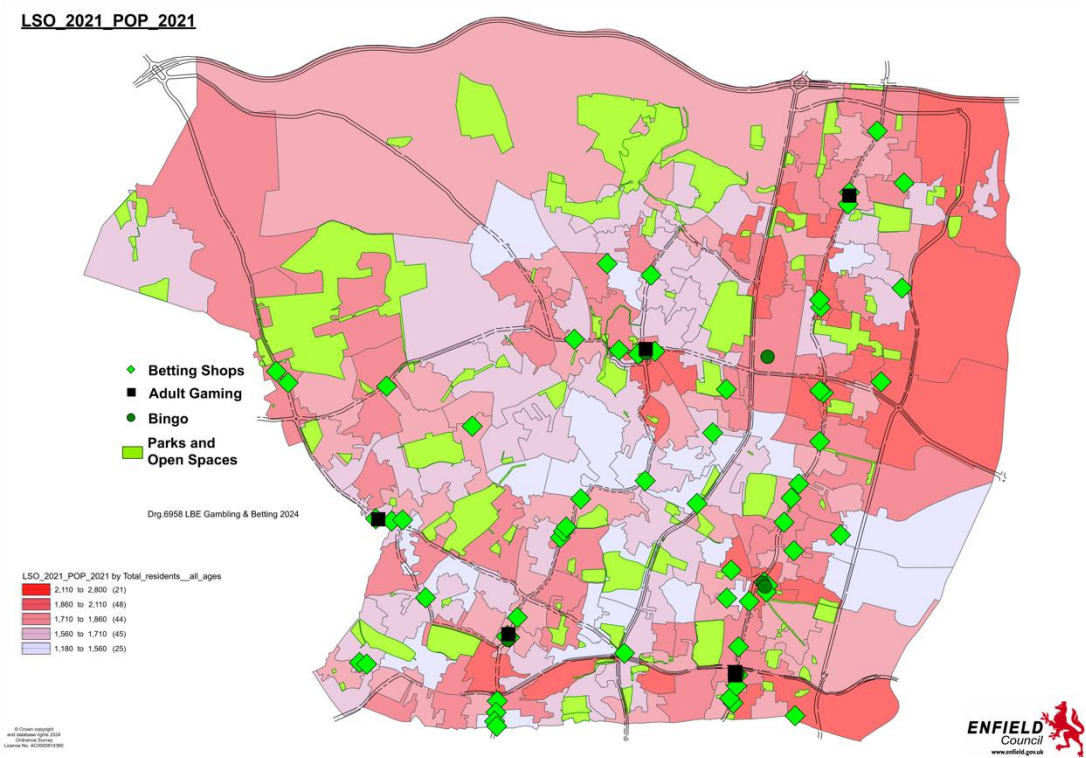
Enfield Profile

Enfield is London's northernmost Borough and covers an area of 8219 hectares (82.2 square kilometres, or 31.7 square miles). Enfield has good links to the national motorway system, the north of the borough being bounded by the M25, accessed at

junctions 24 and 25. It also has two trunk roads – the A10 (London to Cambridge) and A406 (London’s North Circular Road).

In 2019, the total dwelling stock in Enfield was estimated by the Office for National Statistics at 126,255.

Approximately 40% of the Borough’s area is designated Green Belt Land (predominantly in the north and west) comprising country parks, farmland and open land (including urban parks, sports fields, golf courses, allotments and school playing fields). Figure 1.1 below shows a map of the borough.



Gambling Local Area Profile

To best outline the impact and/or potential impact of gambling premises in the London Borough of Enfield this profile focuses primarily on the first two objectives, preventing crime and disorder and preventing exploitation of young and vulnerable people. To do this we have focused on three main areas of data:

- Data relating to social responsibility to young and vulnerable residents;
- Data relating to responsibilities to economically vulnerable residents; and,
- Data relating to crime and disorder.

By providing insight into how these areas of data correspond to the location and patterns of density of gambling premises within the borough the local area profile helps officers and Councillors in developing an appropriate Gambling Statement of Principles.

The Council expects matters such as the following to be considered by operators when making their risk assessment in order to demonstrate they have considered the local area. Some or many of these matters will have been considered and addressed by existing premises.

Matters relating to children and young persons, such as:

- The footfall in the local area, for example, does it predominately comprise residents, workers or visitors, is it a family orientated area, popular with children and young people;
- Significant presence of young children;
- Institutions, places or areas where presence of children and young persons should be expected such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas etc.;
- Any premises where children congregate including bus stops, cafés, shops, and any other place where children are attracted;
- Areas that are prone to issues of youths participating in anti-social behaviour, including such activities as graffiti/tagging, underage drinking, etc.;
- Recorded incidents of attempted underage gambling;
- Transport links and parking facilities;
- Community centres;
- High crime area;
- Other gambling premises in the vicinity.

Matters relating to vulnerable adults, such as:

- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
- Gaming trends that may mirror days for financial payments such as pay days or benefit payments;
- Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
- Proximity of premises which may be frequented by vulnerable people such as hospitals, mental health providers, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate, etc.;
- Homeless or rough sleeper shelters, hostels and support services;
- Transport links and parking facilities;
- Community centres;
- High crime area;
- High unemployment area;
- Pawn broker/pay day loan businesses in the vicinity;
- Other gambling premises in the vicinity.

These matters should be considered and taken into account in the Local Area Risk Assessment that gambling licence applicants are expected to undertake. If an

application for a new licence or variation is submitted that is within 400 metres of a premises/location where children, young persons and vulnerable persons are likely to be present, then operators are encouraged to provide details of the measures to be implemented that would overcome the risks to the objectives.

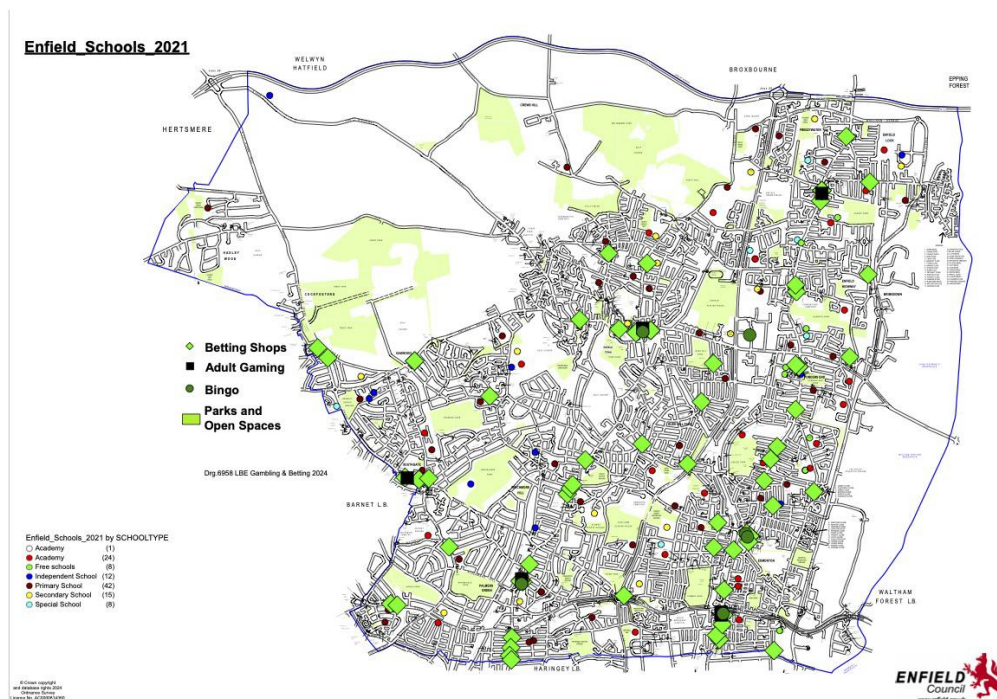
Risks to young people and vulnerable residents

This section is intended to outline the data and mapping to indicate where there are areas with higher concentrations of younger and more vulnerable people who may be less resilient to the potential negative impacts of gambling. Mapping this against concentrations of gambling premises may support more consideration of applications in those areas, and management of existing gambling premises with regard to their responsibilities as gambling licence holders.

Why are we focussing on vulnerable residents? This is both because we have a responsibility to vulnerable residents and because the evidence base outlines the increased risk of harm from gambling that vulnerable people are subject to.

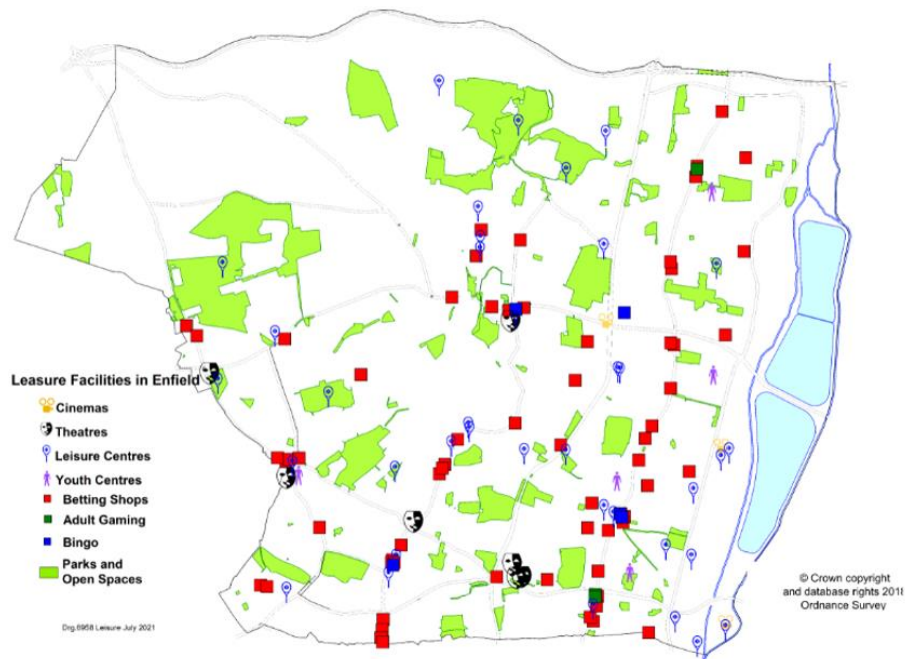
Education locations

This map shows the location of schooling across Enfield. As can be expected the concentrations of schooling match to areas of higher population, and therefore tend to correspond to some of the areas of higher gambling premises. In particular the Hertford Road corridor, Edmonton Green and Palmers Green show an overlap in concentration of schools (both academies and primary schools) and gambling premises, particularly betting shops and bingo premises. The Enfield Town area also shows some overlap also.



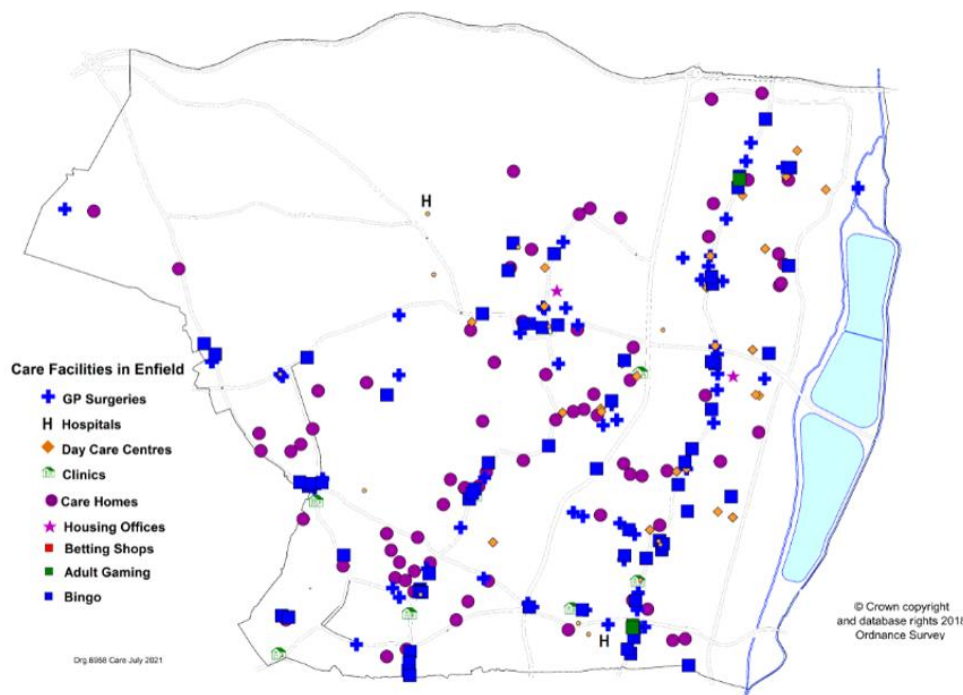
Leisure facilities

Concentrations of Youth Centres and Leisure Centres in the Hertford Road/Edmonton Green area align with concentrations of betting shops. There is also close proximity between a youth centre and betting shops in the Southgate area. Otherwise, distribution of gambling premises and leisure facilities is not particularly overlapping.



Medical centres

The spread of medical centres across Enfield means that there is significant amount of overlap. In particular Palmers Green has a high level of over concentration overlap between care homes and betting shops, and in the Edmonton Green area a high number of GP surgeries also ensures a high level of concentration overlap. Overall these concentrations align to population concentration in the borough and it is not clear that these concentration overlaps represent additional levels of risk.

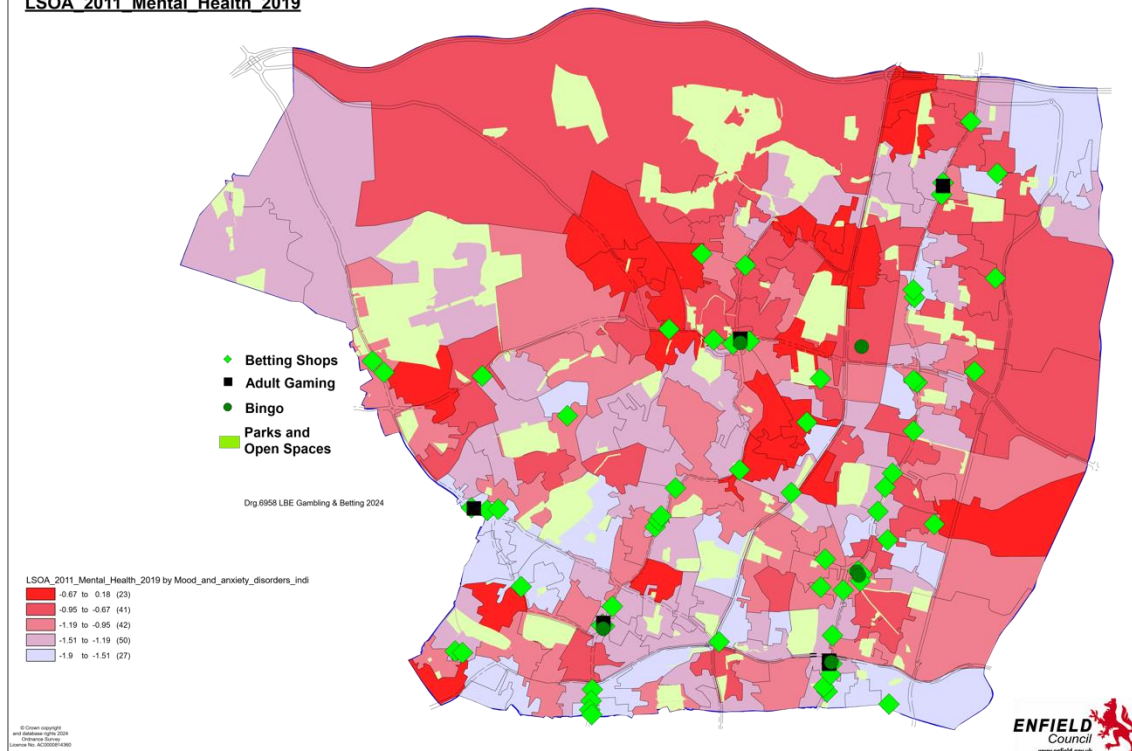


Areas of increased mental health concern

The distribution of mood and anxiety disorders in Enfield do not show a significant alignment with higher concentrations of gambling premises. The closest concentration of gambling premises in areas of higher mental health needs are in the Enfield Town area.

However, the actual location of gambling premises of all types closely correlates to areas of high and medium mental health need. Although it is unlikely that this link is causal or an outcome of either higher mental health need or location of premises, it is a factor that creates an increased risk and needs to be taken into account by gambling licence applicants when conducting their local area risk assessments and by the Council in setting policy for gambling in Enfield.

LSOA 2011 Mental Health 2019

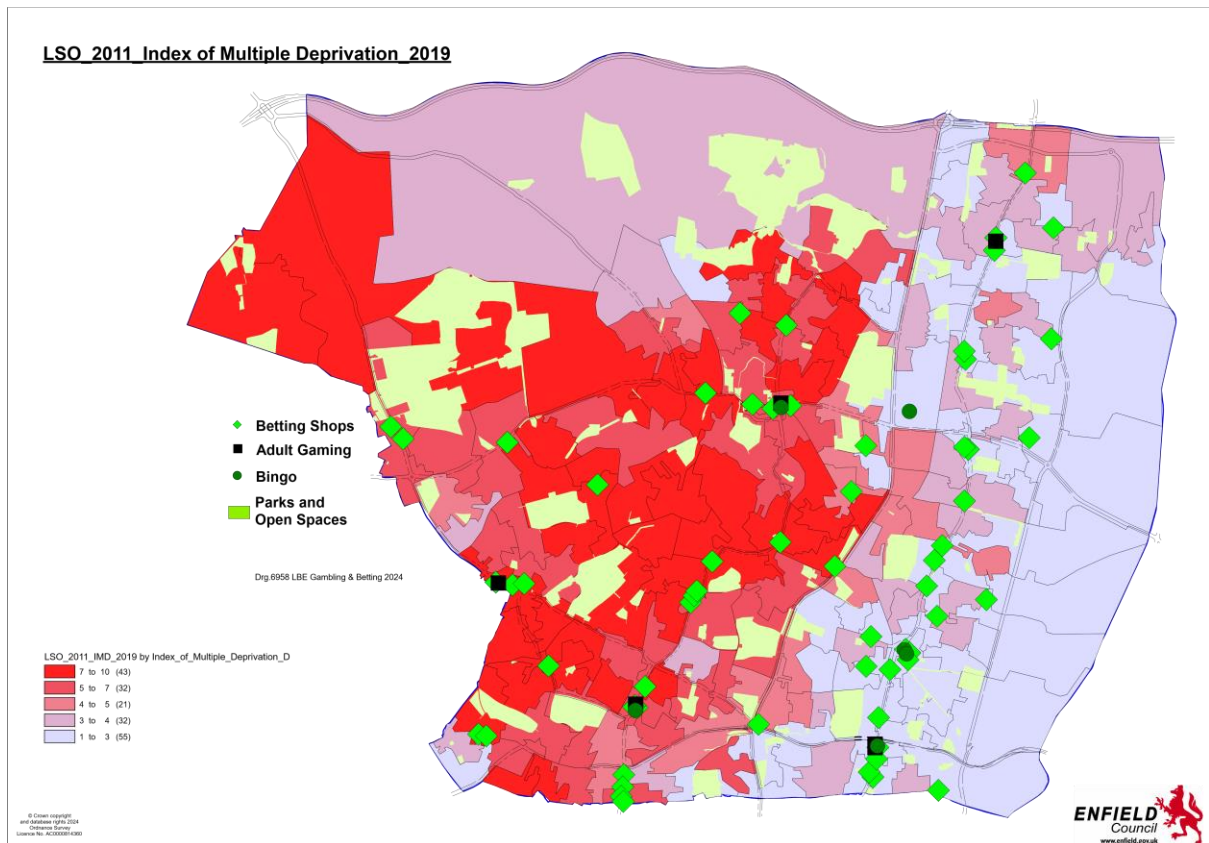


Risks to economically vulnerable residents

This section is intended to highlight any concentrations of gambling premises with areas of economic insecurity, such as areas of higher unemployment and higher Universal Credit receipt. The potential for negative outcomes or impacts of gambling not in a responsible way are likely to be significantly more impactful for those who are economically insecure, particularly as any financial impact from gambling will have more impact for those with less economic security. Mapping this against concentrations of gambling premises may support more consideration of applications in those areas, and management of existing gambling premises with regard to their responsibilities as gambling licence holders.

Multiple deprivation indices

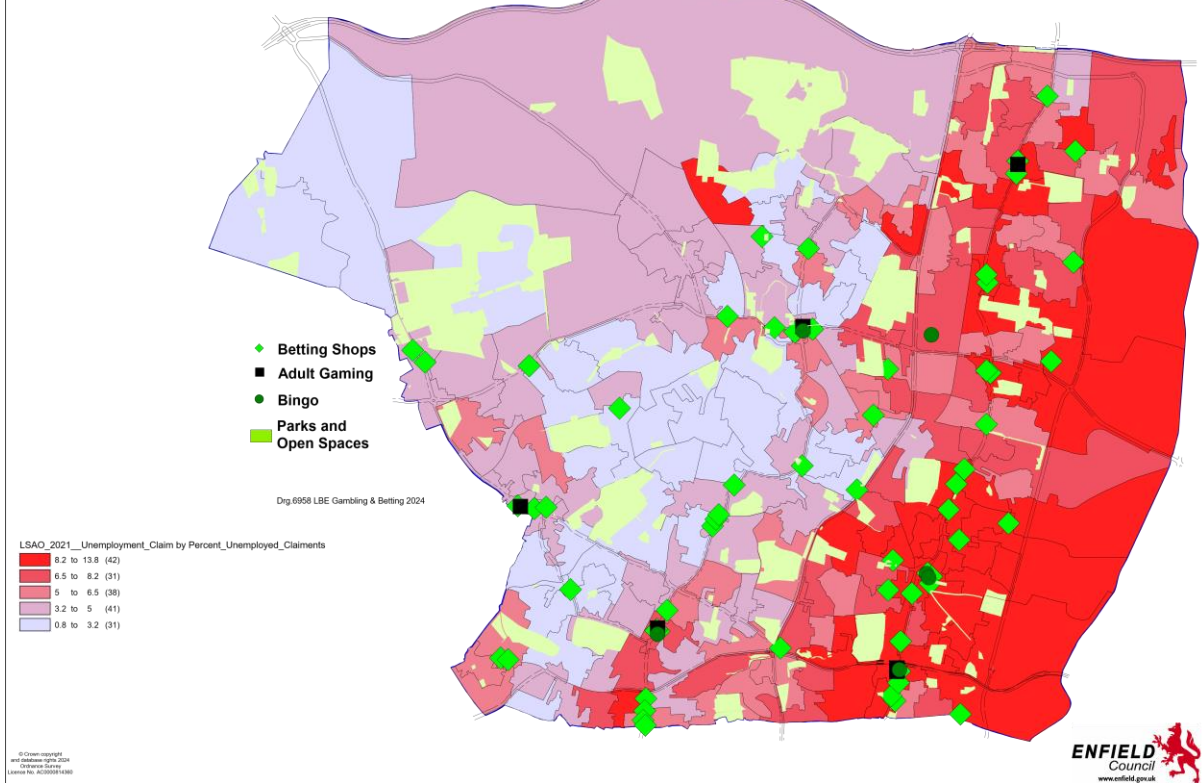
The concentration of gambling premises all along the Hertford Road, taking in Edmonton Green, Lower Edmonton, Ponders End, Enfield Highway and Enfield Lock, is strongly correlated to areas of high deprivation. Approximately half of all gambling premises are within areas that have deprivation index scores below four. Given the increases potential for suffering economic harms due to gambling and the decreased ability to absorb gambling losses without suffering economic harms in these areas of higher deprivation this is an area of concern. Gambling licence applicants will need to take this into account take when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.



Unemployment map

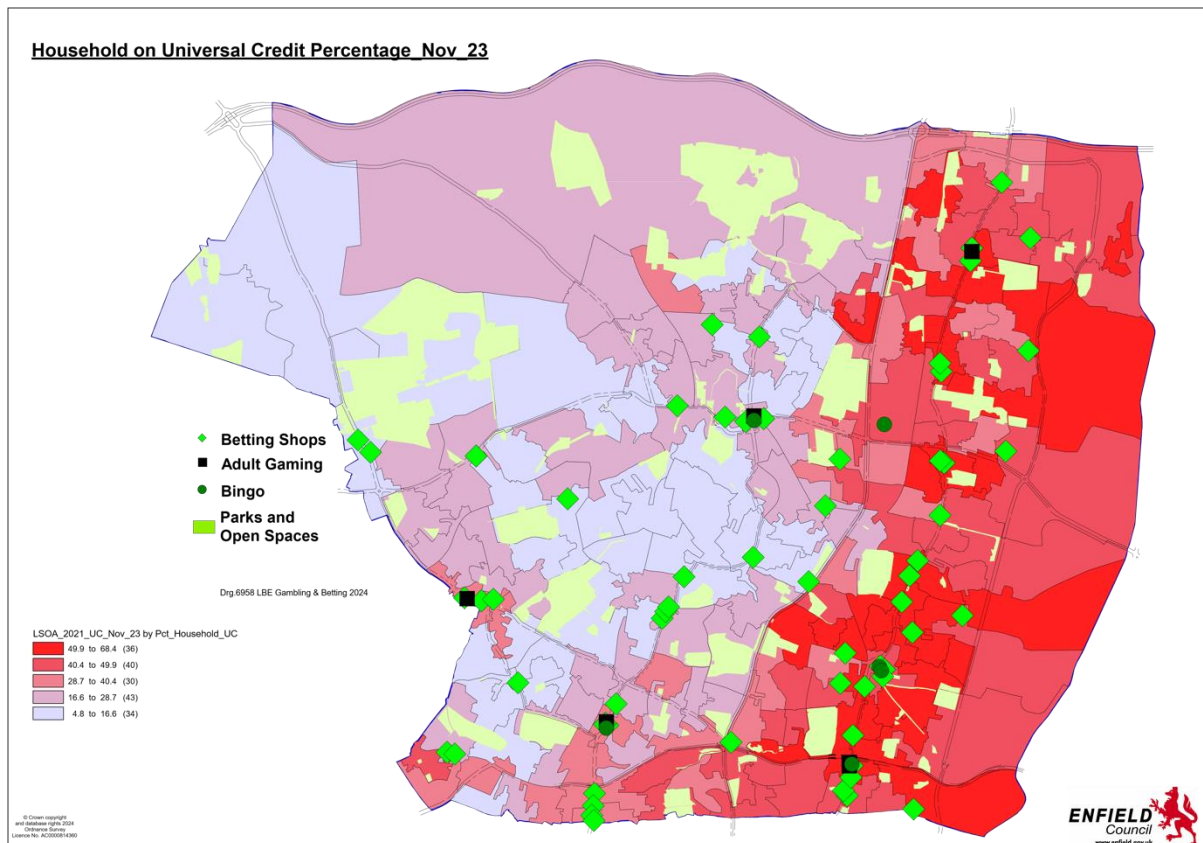
The overlap of gambling premises and areas of higher average unemployment is also notable along the Hertford Road, particularly in Edmonton Green, Lower Edmonton, Ponders End, Enfield Highway and Enfield Lock. It is also more notable in Bowes, where a small area of higher unemployment matches a cluster of betting shops. Given the increases potential for suffering economic harms due to gambling and the decreased ability to absorb gambling losses without suffering economic harms in these areas of higher deprivation this is an area of concern. Gambling licence applicants will need to take this into account take when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.

LSAO_2021 Unemployment Claim Jan 24



Households on Universal Credit map

The concentration of gambling premises all along the Hertford Road, taking in Edmonton Green, Lower Edmonton, Ponders End, Enfield Highway and Enfield Lock, is strongly correlated to areas of high numbers of households on Universal Credit. Approximately half of all gambling premises are within areas that have between 40 and 68% of households in receipt of Universal Credit. Given the increases potential for suffering economic harms due to gambling and the decreased ability to absorb gambling losses without suffering economic harms in these areas of higher deprivation this is an area of concern. Gambling licence applicants will need to take this into account take when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.

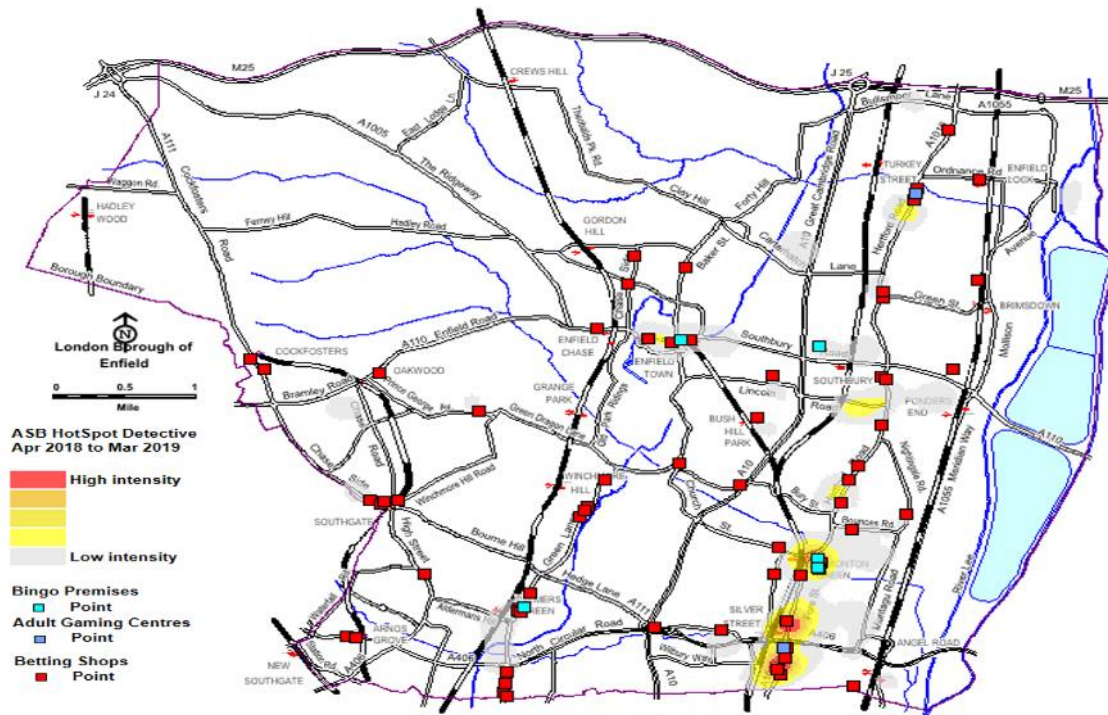


Preventing crime and disorder

Research indicates that there is a correlation between crime and concentrations of gambling premises. This is particularly notable where other factors related to crime are also present, such as area deprivation and some aspects of place management (eg. Location of bus stops, take away food shops etc.). Understanding where concentrations of crime and concentrations of gambling premises overlap is important to developing responses to this, both within the Gambling Statement of Principles and through other means at the Council’s disposal.

Anti-social Behaviour map

As per a number of the other indicators and data sets, the primary concentration of anti-social behaviour incidents in Enfield are clustered along the Hertford Road, particularly in Edmonton Green, Ponders End and Enfield Lock. These clusters align closely with clusters of gambling premises – including 2 of 5 Bingo premises and 2 of adult gaming centres. Gambling licence applicants will need to take this into account when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.



Data sources

The data sources being used for the updated LAP are primarily the same as used for the previous LAP, this provides continuity and comparability, accounting for changes and allowing for comparison to a baseline. The source of each data set is noted next to it in the above list.

Conclusions

The data and mapping show clear co-location of gambling premises and:

- Locations of facilities used by younger and more vulnerable people;
- Areas of deprivation and economic vulnerability; and,
- Locations of anti-social behaviour in the borough.

The data and mapping show clear areas of concern in the borough that may need additional consideration within the Gambling Policy to ensure that the risks and potential harms are minimised.