No.	Consultee/ Respondent	Response/Comments	Officer response
1.	Head of Health Inclusion, Public Health South Tees	Recommended Language Changes: Please can the phrase 'problem gambling' be change to 'gambling harms' You can find guidance on these language choice recommendations in the language guide linked here: Words can hurt – Language guide for gambling harms North East This will help to remove stigmatising language	Recommended language changes accepted. Final draft policy amended accordingly.
		Definition of gambling harm: - Please can this be added to the glossary section - Gambling harms: The negative impacts from gambling on the health and wellbeing of individuals, families, community and society.	The definition of gambling harm has now been included in the glossary section.
		Please can estimated levels of harm be included: 'In the North East, in 2023, it was estimated that 4.9% of the population (aged 16+) are atrisk gamblers, where they experience some level of negative consequences due to gambling. This is the highest regional estimated prevalence of at-risk gambling in England (Office for Health Improvement and Disparities, 2023). In Middlesbrough it is estimated that 5,958 people aged 16+ are experiencing gambling harms (negative consequences due to gambling) (based on figures from the Office for National Statistics from July 2024).'	This information relating to the estimated levels of harm has been included in the Final draft policy.
		Please can the scope of harms be included: Gambling can be highly addictive, and many may suffer extreme ill health as a result. Gambling harms are any negative consequence or side effect experienced as a result of gambling. Gambling harms are not only felt by the person who gambles but also affected others. There is a vast scope of harms that come from gambling.	This information relating to the scope of harms has been included in the Final draft policy.
		Gambling harms can include: - Financial challenges: Many people experiencing gambling related harms are also from backgrounds of socioeconomic disadvantage (Rintoul, et al., 2013). Debts and financial hardship can be experienced by gamblers and affected others. These harms can often be severe and impact the children of gamblers (Darbyshire, et al., 2001).	

- Relationship harms: Domestic violence and abuse (DVA) have also been identified
 as a harmful impact of gambling (Roberts, et al., 2016). Studies have found an
 increased risk of intimate partner violence among people experiencing gambling
 addiction (Dowling, et al., 2016). Studies have reported that adult gamblers can
 neglect their duties to their children such as failing to provide food or collect them
 from school (Public Health England, 2021).
- Crime: Gambling at harmful levels has been linked to fraud, theft, embezzlement, domestic abuse, blackmail, and harassment (Dougherty, et al., 2021). These crimes can happen when people try to raise funds to support a gambling habit (Arthur, et al., 2014).
- Criminal Justice System: There is a relationship between gambling harms and people within the criminal justice system. Research indicates that 5.4% of male and 3% of female prisoners believe that their current sentence was linked to gambling (May-Chahal, et al., 2015).
- Suicide: There is an established link between gambling addiction and suicide attempts and ideation, represented in the national suicide prevention strategy 2023-2028. Studies of young people show people (aged 16 24) who have experienced gambling addiction found men were 9 times and women 5 times more likely to attempt suicide than those who have not experienced any problems with their gambling (Wardle & McManus, 2021).
- Depression: In England, it is estimated that there are 69,099 people with depression associated with moderate-risk and harmful gambling (Office for Health Improvement & Disparities, 2023).
- Employment: Gambling is associated with higher risk or future unemployment in the UK (Muggleton, et al., 2021). There is an estimated 22,932 unemployment benefit claims associated with gambling related harms (Office for Health Improvement & Disparities, 2023).
- Education: Absenteeism can also impact the children of gamblers whose school attendance and therefore educational attainment can suffer as a consequence of being in a home environment impacted by gambling harms. This then links to underperformance at places of education or employment which can be a consequence of gambling harms (Shaw, et al., 2007).

Please can PH principles be included:

Middlesbrough Council recognises that gambling-related harms are a public health issue, not solely a matter of regulation or crime, affecting individuals, families, and the wider community.

- This Statement of Principles adopts a public health approach with emphasis on prevention, early intervention and reducing inequalities. This aims to ensure that licensing decisions contribute to the health, wellbeing and social resilience of our residents.
- The Council will work in partnership with Public Health South Tees, health and the voluntary/community sector to monitor and mitigate gambling harms.
- In areas identified as high deprivation or with higher vulnerability, the Council may require additional or enhanced harm-prevention measures, over and above baseline licensing requirements.
- Operators must include in their local risk assessments how they will avoid exacerbating inequalities, especially in wards with high deprivation.
- Required measures may include (but are not limited to):
 - Licensed operators will be expected to contribute to local public health efforts to raise awareness of gambling harms, including partnering in local campaigns, supporting education/prevention initiatives, and contributing data for local monitoring where possible.
 - There is an expectation that operators support with independent research and impact assessments regarding applications for new premises;
 - Staff training around identifying and supporting customers showing signs of gambling harm, particularly in vulnerable populations;
 - Mandatory display of public health / safer gambling messages in premises, along with signposting to local support (e.g. GamCare, local mental health services);
 - Use of self-exclusion mechanisms which are robust and easy to access, with active monitoring of usage and follow-up;
 - Marketing, promotions, and advertising should avoid targeting or disproportionately reaching vulnerable persons, including children, people experiencing unemployment or poverty, and those in recovery from addiction.
- This policy aligns with Middlesbrough's Council Plan 2024-2027 priority of "A Healthy Place" and the Health & Wellbeing Strategy 2024-2030, which aims to

This information regarding the Public Health principles has been included to the Final draft policy.

	reduce health inequalities, support people to live healthier, longer lives and provide early intervention services.	