

LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE: Review of the Statement of Gambling Policy 2026-2029 and Camden's Local Area Profile	
REPORT OF: Director of Recreation & Public Safety	
FOR SUBMISSION TO: Licensing Committee	DATE: 15 July 2026
SUMMARY OF REPORT This report details the review of Camden's Statement of Gambling Policy 2026-2029 under the Gambling Act 2005 and the accompanying Camden Local Area Profile. Gambling can have profound and wide-ranging harm on individuals, families, close associates and wider society. Harmful gambling's impact on communities' health has been conservatively estimated to cost £1.4b per year (related to suicide, homelessness etc). The policy sets out, within the legal "aim to permit", to limit its harm by taking account of an evidence led approach to harm factors and local communities. The draft Policy has been updated to reflect current national guidance, clarify the role of the local area profile and operator local risk assessments, and strengthen the Council's response. The Licensing Committee is asked to consider and comment on the draft Statement of Gambling Policy 2026-2029 at Appendix 1 and the updated Camden Local Area Profile at Appendix 2, and that the Committee approve a 12-week public consultation on both documents. Local Government Act 1972 – Access to Information The following documents have been used in the preparation of this report: 1. The Gambling Act 2005 2. Gambling Commission Guidance to Licensing Authorities 3. Draft Statement of Gambling Policy 2026-2029 4. Camden Local Area Profile, updated April 2026 Contact Officer: William Sasu, Public Protection and Licensing Manager 5 Pancras Square London, N1C 4AG Tel: 020 7974 4733 william.sasu@camden.gov.uk	

RECOMMENDATIONS

That the Licensing Committee:

- i) Note and comment on the draft Statement of Gambling Policy 2026-2029 at Appendix 1;
- ii) Note and comment on the updated Camden Local Area Profile at Appendix 2; and
- iii) Agree a public 12-week statutory consultation on the draft Policy and Local Area Profile.

Signed:



Oliver Jones

Date: 24th June 2026

1. PURPOSE OF REPORT

- 1.1. A Statement of Gambling Policy must be determined and published every three years under the Gambling Act 2005. During each three-year period, the Council must keep the Policy under review and make any revisions that it considers appropriate.
- 1.2. A review of Camden's current gambling policy has now been undertaken alongside Camden's Local Area Profile (see paragraph 2.3). The review has included updates to reflect current Gambling Commission Guidance, local evidence and the Council's evolving understanding of gambling-related harm.
- 1.3. This report sets out the outcome of that review and summarises the proposed amendments to the draft Statement of Gambling Policy 2026-2029 and the updated Local Area Profile and asks the Licensing Committee to agree a 12-week public consultation on the draft Policy and Local Area Profile.

2. BACKGROUND

- 2.1. Under the Gambling Act 2005, licensing authorities are bound by a statutory aim to permit¹ and must grant premises licenses so long as application are in accordance with:
 - The Gambling Commission's codes of practice
 - The Gambling Commission's guidance to local authorities
 - Local authority gambling policy (updated draft for consultation at Appendix 1)
 - The three licensing objectives (set out in 2.3)
- 2.2. A Statement of Gambling Policy under the Gambling Act 2005 sets out how the Council will exercise its functions in relation to gambling premises licences, permits, notices and registrations. It helps maintain consistency, supports transparent decision making and assists the Council in promoting the statutory licensing objectives.
- 2.3. Those objectives are:
 - Prevention of gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
 - Ensuring that gambling is conducted in a fair and open way.
 - Protection of children and other vulnerable persons from being harmed or exploited by gambling.
- 2.4. The Gambling Commission's guidance continues to endorse the use of Local Area Profiles as a useful tool for licensing authorities. Although a local area profile is not mandatory, it assists the Council, applicants, responsible authorities and local communities by identifying characteristics and locations where vulnerability to gambling-related harm may be higher.
- 2.5. The draft Policy at **Appendix 1** and the updated Local Area Profile at **Appendix 2**

¹ Section 153 of Gambling Act 2005

seek to provide a clear, evidence-led framework for decision making. Together they support proportionate regulation, clear expectations of operators and more effective local risk assessments.

- 2.6 Applications for Gambling premises within the borough continue to be determined by a Licensing Panel comprising locally elected Councillors, ensuring that statutory requirements are considered alongside local knowledge and community perspectives.

3. LINKS TO THE CAMDEN PLAN AND CAMDEN'S BROADER STRATEGIES

- 3.1. The draft Policy aligns with We Make Camden by supporting a borough that is strong, sustainable and inclusive, and where everyone is safe in their communities. In relation to gambling, this means maintaining a fair and lawful leisure offer while recognising the need to identify and mitigate gambling-related harm.
- 3.2. The updated Local Area Profile reinforces that approach by bringing together current evidence on deprivation, financial hardship, housing insecurity, homelessness, student concentration, young adult populations and wider health inequalities. These factors are relevant because they can increase vulnerability to gambling-related harm and reduce resilience when harm occurs.
- 3.3. In drafting the Policy, consideration has therefore been given not only to the statutory licensing framework, but also the wider public health and place-based context in Camden. This is to ensure that licensing decisions are informed by the borough's current social and economic realities, while remaining proportionate and consistent with the Gambling Act 2005.

4. SUMMARY OF KEY CHANGES

- 4.1. A number of changes have been made to the draft Statement of Gambling Policy 2026-2029 and the accompanying Local Area Profile. The principal changes are summarised below and seek to strengthen the Council position regarding the gambling related harm to its communities.

Updated Introductory Policy Framework (Chapter 1, pages 7-8)

- 4.2. The draft Policy has been revised to explain more clearly how the licensing authority will exercise its functions under the Gambling Act 2005, how local risks will be taken into account, and how the Policy should be read alongside Camden's Local Area Profile.
- 4.3. New introductory wording has been included to make clear that applicants are expected to address the risks identified in the Local Area Profile within their local risk assessments and, where relevant, within their applications (**Policy page 7**).

Human Rights and Regulatory Framework (Chapter 1 pages 12 & 14-16)

- 4.4. This makes express reference to the Human Rights Act 1998 and the need to balance the rights of applicants, licence holders, persons affected by gambling premises and the wider community (**Page 14**).
- 4.5. The draft also explains the Council's relationship with the Gambling Commission's Guidance, the Licence Conditions and Codes of Practice, the Regulator's Code and

We Make Camden (Pages 12-16)

Strengthened role of the Local Area Profile (Chapter 3 pages 21-22)

- 4.6. This chapter in Camden's Local Area Profile has been expanded to explain what the profile is, what it is intended to do and how operators should use it when preparing local risk assessments.
- 4.7. Additional text has been included to emphasise that the profile draws together evidence on children and young people, deprivation, economic vulnerability, housing pressure, homelessness, crime, anti-social behaviour and disorder, and that applicants should explain how those risks are addressed at premises level.

Updated Camden Evidence Base (Local Area Profile pages 3-6)

- 4.8. The Local Area Profile has been comprehensively updated using current borough and national evidence. It reflects Camden's current population estimate of around 217,000 residents, the 20 wards following the 2022 electoral changes and the borough's highly mobile population.
- 4.9. The updated profile also records that Camden has 11 higher education institutions and a student population of almost 30,000 residents, with particularly high concentrations in Bloomsbury. It highlights that 43% of residents are under 30 and 66% are under 45, both of which are relevant to national evidence on gambling participation and harm.
- 4.10. The socio-economic sections have been updated to reflect recent local evidence, including a median equivalised household income of £52,048 in 2025. However, continuing deprivation in parts of the borough highlights, 8,380 households on the social housing waiting list in March 2025, and 975 people rough sleeping in 2024/25.

Current Gambling-Related Harm (Local Area Profile pages 6-7)

- 4.11. The profile includes new national and local evidence on gambling-related harm, including the Gambling Survey for Great Britain and Camden's own public health material. It notes local estimates that around 600 residents are gambling at levels that cause harm, around 5,000 are gambling at levels that put them at risk of harm, and around 13,000 may be harmed by someone else's gambling.
- 4.12. The profile also highlights the links between gambling harm, debt, poor mental health, domestic abuse, employment impacts and increased suicide risk. This provides a stronger local rationale for requiring operators to demonstrate robust mitigation measure within their local risk assessments.

Implications for Applicants, Operators and Decision Making

- 4.13. Taken together, the draft Policy and Local Area Profile strengthen Camden's evidence-led and risk-based approach to gambling. They are intended to improve the quality of applications, provide greater clarity to operators and support more consistent licensing decisions (**Local Area Profile pages 7-8**).
- 4.14. They do not seek to prevent lawful gambling outright but rather, provide a clear framework for assessing local risk, applying proportionate controls where

appropriate and ensuring that vulnerable persons are better protected from harm or exploitation by gambling.

5. THE LOCAL AREA PROFILE (LOCAL AREA PROFILE pages 3 & 8)

- 5.1. Camden continues to meet the Gambling Commission's description of an area where a Local Area Profile is useful. It is a densely populated inner-London borough with major transport hubs, a substantial student and young adult population, marked inequalities, high housing costs and a busy evening and night-time economy.
- 5.2. The updated profile identifies a number of characteristics that are especially relevant to gambling-related harm in Camden, including deprivation, financial pressure, overcrowding, homelessness, rough sleeping, the concentration of students and younger adults, and the availability of treatment, support and advice services.
- 5.3. The profile therefore recommends that operator risk assessments and licensing scrutiny should continue to focus on locations with high concentrations of young people, students, deprivation, homelessness or temporary accommodation, treatment and support services, and high-footfall transport or night-time economy uses.

6. NEXT STEPS

- 6.1. The Gambling Act 2005 requires that a statutory consultation on the Statement of Gambling Policy is carried out to seek the views of the chief officer of police, representatives of gambling businesses in the area and persons who are likely to be affected by the exercise of the licensing authority's functions.
- 6.2. Consistent with previous practice, it is proposed that consultation will also be extended to residents' groups, community associations, faith groups, trader associations, neighbouring licensing authorities, relevant council teams, responsible authorities, ward councillors and other relevant stakeholders.
- 6.3. It is recommended that the Committee approve a 12-week public consultation on the draft Statement of Gambling Policy 2026-2029 and the updated Local Area Profile.

7. FINANCE COMMENTS OF THE EXECUTIVE DIRECTOR CORPORATE SERVICES

- 7.1. There are no material financial implications concerning this report. The Director of Finance has been consulted in the preparation of this report and has no further comments to add.

8. LEGAL COMMENTS OF THE BOROUGH SOLICITOR

- 8.1. The policy is a non-statutory licensing policy. It provides a set of presumptions and guidelines for the determination of individual cases, that are to be decided on their merits.
- 8.2. It is considered helpful to have a policy to promote certainty amongst local residents and businesses and consistency of decision making.

- 8.3. Before it approves and adopts its policy, the Council must consult those persons listed in section 349(3) of the Gambling Act 2005. These are: the chief officer of police for the area, persons or bodies who represent the interests of local gambling businesses in the area and persons or bodies who represent businesses and residents in its area who are likely to be affected by the Council exercising its functions under the Act.

The views of all these persons or bodies should be given appropriate weight when the policy is determined.

- 8.4 To give effect to the Council's public law duties and specific duties in relation to equalities, decision makers must take into account in coming to any decision the Council's equality duties and have due regard to them. In summary, these legal obligations require the Council, when exercising its functions, to have 'due regard' to the need to: a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act (the protected characteristic of marriage and civil partnership is also relevant); b) advance equality of opportunity between people who share a relevant protected characteristic and those who don't; and c) foster good relations between people who share a relevant protected characteristic and those who don't (which involves tackling prejudice and promoting understanding). Under the Duty, the relevant protected characteristics are Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion, Sex, and Sexual orientation.

9. THE SECTION 149 PUBLIC SECTOR EQUALITY DUTY

- 9.1. The s149 duty sits alongside and does not override statutory requirements in relation to determining this Policy.
- 9.2. When Members have before them material on issues relevant to s149, such material must be specifically assessed in the context of s149. However, because s149 creates a requirement to "have regard" the fact a matter raised is relevant to s149 will not automatically translate into a reason for refusing an application that would be sustainable in any subsequent appeal, given the legal requirement to determine applications in compliance with legislation.
- 9.3. An Equalities Impact Assessment has been undertaken and is appended at **Appendix 3**. The EqlA concludes that no direct adverse impacts have been identified arising from the draft Statement of Gambling Policy or the updated Local Area Profile. It also finds that the principal equality effects are positive, in that the revised Policy and refreshed Local Area Profile strengthen the Council's evidence-led approach to protecting children and young people and other vulnerable persons from gambling-related harm, while improving consideration of deprivation, low income, homelessness, disability and related vulnerabilities in operator risk assessments, consultation and decision-making. The EqlA identifies accessible publication, inclusive consultation and ongoing monitoring as appropriate mitigation and follow-up measures.

10. ENVIRONMENTAL IMPLICATIONS

- 10.1. There are no direct environmental implications arising from this report.

11. APPENDICES

Appendix 1: Draft Statement of Gambling Policy 2026-2029
Appendix 2: Camden Local Area Profile Updated April 2026
Appendix 3: Equalities Impact Assessment

REPORT ENDS