Brent NHS West and North London	**Brent Health and Wellbeing Board** 9 November 2026
	Report from the Corporate Director of Service Reform and Strategy
	Cabinet Member for Community Safety and Public Health

Brent Gambling Harms Prevention Strategy 2026-2030

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Appendix A - Brent Gambling Harms Prevention Strategy 2026-2030 Appendix B - Equality Impact Assessment
Background Papers:	Gambling Needs Assessment 2024 High streets at stake: The rise of Adult Gaming Centres
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1.0 Executive Summary

1.1 This report shares the draft Brent Gambling Harms Prevention Strategy 2026-2030 for comment and endorsement by the Health and Wellbeing Board. This strategy will also go to Cabinet for approval.

1.2 Brent is already leading from the front on gambling harms prevention. We conducted a gambling Joint Strategic Needs Assessment in 2024, which gave a clear insight into the high level of gambling and gambling harm within the borough and highlighted the need for intervention. In response, the Council has spearheaded a national campaign to lobby government to grant local authorities greater powers to prevent the proliferation of gambling venues on our high streets- this campaign has led to the government recently announcing a series of key changes.

1.3 The purpose of this strategy is to build on this strong foundation of leadership and set out a clear programme of action for the coming years. The strategy seeks to continue our role in driving change nationally, and to bolster our local approach to preventing and tackling the harm caused by gambling. The strategy is focused on strengthening our local offer of prevention, early intervention and support and challenging the wider systems and environments that contribute to gambling-related harm. It seeks to establish stronger partnership working, recognising the role we all must play in tackling gambling harm.

2.0 Recommendation(s)

2.1 The Health and Wellbeing Board is asked to endorse the Gambling Harms Prevention Strategy 2026-2030, which will also go to Cabinet on 7 December 2026.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 The new Council Plan, which will be considered by Cabinet on 9 November 2026 and Full Council on 16 November 2026, sets out three priorities that will guide everything Brent Council does as an organisation. Subject to the Plan being approved by Council, this strategy will directly support delivery of two of these priorities.

3.1.2 Under 'A borough to be proud of', the strategy will contribute to the 'Thriving town centres and high streets' focus area. The strategy directly ties into one of the commitments set out in this focus area; to continue to take strong action to reduce the concentration of premises that undermine community wellbeing, including gambling arcades. By strengthening our commitment to preventing the proliferation of gambling premises and creating stronger mechanisms to do so, we will contribute to high streets that better meet the needs of our communities and increase pride in our high streets and town centres.

3.1.3 The strategy will also support 'A borough where people thrive', particularly the 'Healthy and active communities' focus area. Within this focus area, the Council commits to work to reduce health inequalities and make it easier to access early support. The strategy adopts a public health approach, recognising that gambling harm can have significant and far-reaching impacts on the health and wellbeing of individuals, families and communities. We will strengthen pathways into appropriate support for those experiencing gambling harm, while taking action to prevent harm from occurring in the first place.

3.2 Background

<u>Context</u>

3.2.1 We know that Brent residents are disproportionately affected by gambling harm. Brent is among the areas with the highest number of gamblers who experience the most negative consequences as a result of gambling. 17.1% of people in

Brent are considered to be gambling with a low-level of risk (vs 13.4% in the rest of the country), while 6.2% are considered to be gambling with the highest level of risk (compared with 2.9%). The economic cost of gambling in Brent was estimated at £14.3 million in 2022 – a sevenfold rise from £2 million in 2012 – ranking it among the most affected boroughs for fiscal gambling related-harm. Brent also has one of the highest number of gambling premises in London.

3.2.2 Brent's demographic profile matches many of the risk groups most likely to gamble and/or experience harms from gambling. Brent has a younger than average population, high numbers of ethnically diverse communities, and is ranked the fourth most deprived borough in London.

3.2.3 In recognition of the impact of gambling in Brent, work has been ongoing to get a better understanding of gambling in the borough. To build a clearer picture of gambling harms in Brent, we conducted a Joint Strategic Needs Assessment, drawing on evidence and qualitative research to demonstrate the extent and impact of gambling in the borough. Brent also commissioned a report by the Social Market Foundation on the impact of Adult Gaming Centres (AGCs), which explored the rise of AGCs and recommended ways local authorities could be empowered to tackle gambling-related harm on our high streets.

3.2.4 Alongside this, we established a sustained public affairs campaign, lobbying decision makers to strengthen local powers and to take action to reduce the harm gambling causes our communities. In 2025, the Leader of the Council wrote an open letter to the government on gambling harms. Signed by 39 other local authorities, mayors and campaign groups, the letter called for stronger local powers. We have consistently raised the issue of gambling harm, creating and sustaining a national conversation about the challenges people are facing and the need for change. On 11 August 2026, the government announced its intention to revoke the 'Aim to Permit' rule, giving councils stronger power to refuse applications for new gambling premises. The government also announced its intention to require planning permission for AGCs, making it harder for new venues to open. These changes are due to come into effect in early 2027.

<u>Funding</u>

3.2.5 The Office for Health Improvement and Disparities has awarded Local Authority Public Health Teams some funding to support the delivery of needs assessment and strategy development. The national programme covers 2026/27 and 2027/28. The strategy will guide the prioritisation of this funding in line with local need and the agreed programme requirements.

<u>Developing the strategy</u>

3.2.6 The strategy was developed through the use of existing data and insight, and a series of engagement exercises designed to identify and refine the key strategic priorities.

3.2.7 Key engagement exercises included a Gambling Strategy workshop which brought together partners, including Betknowmore UK, B3 (Brent's peer support and advocacy drug and alcohol service), staff and residents with lived experience of gambling harm. The workshop provided an opportunity to explore local priorities, experiences and perspectives, helping to inform the overall direction of the strategy and identify emerging priorities.

3.2.8 A series of focused priority scoping meetings were then held with key staff, with each session centred on an emerging strategic priority. These meetings were used to further develop the priorities, clarify the intended ambitions and identify the actions required to support their delivery.

3.2.9 The strategy has also been informed by:

- Brent's Gambling Joint Strategic Needs Assessment
- Published evidence and research on gambling and gambling harms
- The Social Market Foundation's report commissioned by Brent on Adult Gaming Centres
- National guidance, including from the Office for Health Improvement and Disparities

3.2.10 The draft strategy was shared for feedback with a range of key stakeholders, including gambling charities, local organisations who support residents with lived experience of gambling harms, all members of the Health and Wellbeing Board and key officers.

The strategic priorities

3.2.11 Our ambition is for Brent to be a borough where fewer people experience gambling-related harm, support is available early and without stigma, and organisations work together to prevent harm before it occurs. The strategy takes a public health approach. This means looking beyond individual gambling behaviour to the wider factors that influence harm, including gambling products and industry practices, local availability and exposure, socioeconomic circumstances and national and local policy.

3.2.12 Below are the 4 strategic priorities proposed in the draft strategy, with a brief description of what this means:

Priority 1: Raising awareness and driving change

We will raise awareness and understanding of gambling-related harms across Brent through communications and educational campaigns and help those impacted by gambling harms via support pathways. Alongside this, we will continue to advocate for stronger government legislation and local powers to reduce gambling-related harm in our communities.

Priority 2: Embedding a data-led approach

Data will be at the core of our approach to tackling gambling harms. We will build a robust local evidence base on gambling related harm in Brent to guide

decisions for future interventions and support. This will also strengthen our ability to refuse planning and licensing applications for gambling presences in the borough.

Priority 3: Regulation, planning and enforcement

To reduce the harms caused by gambling, we also need to reduce one of the causes – gambling premises. We will make robust, lawful and proportionate use of the Council's available planning, licensing and enforcement powers to address gambling-related risks and support safe, diverse and sustainable high streets.

Priority 4: Improving pathways to support

We will work with partners, support services, and colleagues across the Council to strengthen our processes for earlier identification of individuals at risk of experiencing gambling harms. Anyone at risk will have access to newly developed clearer, and more effective pathways to support.

Delivering the strategy

3.2.13 To support the successful delivery of the strategy, the following activities are initially planned:

Action plan

A detailed action plan will be developed, setting out the specific activities that will take place to achieve each priority. This will include lines of responsibility and set clear timescales for delivery.

Gambling Harms Partnership

Tackling tackle gambling harm in Brent will require strong partnership working, with organisations across the borough, coming together to coordinate activity, share expertise and take collective action. The draft strategy proposes establishing a Gambling Harms Partnership, bringing together Council services and key partners, including the NHS and VCFSE sector. Its role will include providing local leadership, supporting effective partnership working and monitoring progress against the strategy.

Next steps

3.2.14 Subject to endorsement by the Health and Wellbeing Board, the strategy will be considered by Cabinet on 7 December.

4.0 Stakeholder and ward member consultation and engagement

4.1 Engagement with stakeholders took place throughout the process for developing the strategy. As detailed in section 3.2.6 a workshop with various

stakeholders was held to establish the key themes that the strategy could address. Subsequent scoping meeting with staff were then conducted to refine these themes into focused priorities.

4.2 The draft strategy was shared for consultation with a range of key stakeholders, including gambling charities, local organisations who support residents with lived experience of gambling harms, partners on the Health and Wellbeing Board and key officers.

5.0 Financial Considerations

5.1 This report seeks endorsement of the Gambling Harms Prevention Strategy 2026-2030.

5.2 Brent has been awarded funding through the Office for Health Improvement and Disparities (OHID) Gambling Harms Prevention Grant for 2026/27. A spending plan has been submitted to OHID with the grant progress update, covering expenditure to date and forecast expenditure for the remainder of 2026/27.

5.3 Funding will be used for eligible gambling harms prevention activity, with payments made within 2026/27 in accordance with the memorandum of understanding. Funding is not transferable between financial years, and unspent or ineligible funding may be recovered.

5.4 The national funding programme covers 2026/27 and 2027/28. Brent's allocation for 2027/28 is not confirmed, and funding is not secured for the full strategy period. Continuing staffing and contractual commitments will require confirmed funding and will be reflected in the Council's medium-term financial forecast.

6.0 Legal Considerations

6.1 The Council has power to adopt and implement the Gambling Harms Prevention Strategy as part of its public-health, community-wellbeing, licensing, planning, safeguarding and partnership functions. The Strategy is a high-level policy framework. Its adoption does not alter the statutory tests applying to individual planning, licensing, enforcement, social-care or safeguarding decisions, each of which must continue to be taken in accordance with the relevant legislation, statutory guidance and the particular evidence available.

6.2 Brent Council is the licensing authority for the purposes of the Gambling Act 2005. Under the legislation currently in force, the Council must exercise its gambling premises-licensing functions in accordance with relevant Gambling Commission codes and guidance, the statutory licensing objectives and the Council's published Statement of Principles. Section 153 of the Gambling Act 2005 presently requires licensing authorities to "aim to permit" the use of premises for gambling where the statutory requirements are satisfied. Accordingly, general concerns about gambling-related harm, the concentration of premises or local opposition cannot, without relevant supporting evidence

connected to the statutory licensing objectives, automatically justify refusal of an application. Each application must be considered fairly and on its individual merits, without predetermination.

6.3 On 11 August 2026, the Government announced its intention to revoke the “aim to permit” rule and to introduce planning controls requiring Adult Gaming Centres to obtain planning permission. These are proposed reforms and, pending the necessary consultation, legislation and commencement arrangements, do not change the law currently applicable to the Council’s decisions. The Council will monitor the development of the reforms and review its Gambling Statement of Principles, planning policies, local evidence base and decision-making procedures once the final legal framework is known.

6.4 Actions taken under the Strategy must represent a lawful, evidence-based and proportionate exercise of the Council’s powers. The Strategy must not be applied as a blanket policy against gambling operators or premises, and planning, licensing and enforcement powers should not be used for an improper purpose or as a substitute for powers available under another statutory regime. Decisions should identify the relevant legal power, take account of all material considerations, disregard immaterial considerations and be supported by adequate reasons and evidence.

6.5 The proposed collection, linkage and sharing of information about gambling-related harm may involve personal data and, in some circumstances, special category data concerning health, ethnicity or other sensitive matters. Before new collection or information-sharing arrangements are implemented, the Council and its partners must identify the applicable lawful basis and, where relevant, a condition for processing special category data; ensure that processing is necessary, proportionate, fair and transparent; apply data-minimisation, retention and security requirements; and put appropriate information-sharing agreements and privacy information in place. A Data Protection Impact Assessment must be completed where the proposed processing is likely to present a high risk to individuals. Wherever practicable, monitoring and evaluation should use anonymised or appropriately aggregated information.

6.6 In approving and implementing the Strategy, the Council must comply with the Public Sector Equality Duty under section 149 of the Equality Act 2010 by having due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. The accompanying Equality Impact Assessment should remain under review as the action plan and individual interventions are developed. Communications, engagement and pathways to support should be accessible, avoid stereotyping particular communities and include reasonable adjustments where required.

6.7 The Strategy does not itself create an entitlement to specific care, support or safeguarding intervention. Where gambling-related harm becomes apparent, the Council must consider whether duties are engaged under the Care Act 2014, children’s safeguarding legislation or other relevant statutory frameworks. Any assessment, safeguarding enquiry or service provision will

remain subject to the applicable statutory criteria, individual circumstances, professional assessment and lawful commissioning arrangements. Gambling behaviour or an apparently unwise financial decision does not, without more, establish that a person lacks capacity under the Mental Capacity Act 2005.

6.8 Any commissioning, grant-funding or partnership arrangements arising from the Strategy must comply with the Council's constitutional and financial procedures and all applicable procurement, subsidy-control, contractual and information-governance requirements. The proposed Gambling Harms Partnership should operate under clear terms of reference setting out its membership, remit, accountability, decision-making and reporting arrangements. It should not fetter the discretion of the Council's statutory decision-makers or be treated as having authority to determine individual licensing, planning, safeguarding or service-entitlement matters.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The council also internally recognises care experience and socio-economic status as protected characteristics.

7.2 The strategy has been subject to an EIA (Appendix B) and officers believe that there are no adverse equality implications. The strategy is expected to have positive impacts on all residents who are affected by gambling. In particular it is expected to have positive impacts on groups most vulnerable to the harm caused by gambling, including young people, men, multiethnic groups and those experiencing socio-economic disadvantage and poverty

8.0 Climate Change and Environmental Considerations

8.1 There are no climate change and environmental considerations for this report.

9.0 Communication Considerations

9.1 Communications will play an important role in supporting the delivery of the Gambling Harms Prevention Strategy, particularly through Priority 1: Raising awareness and driving change. A borough-wide communications campaign will be developed to increase awareness and understanding of gambling-related harms, challenge stigma and ensure residents know where they can access help and support. This will bolster our existing public affairs work, expanding our communications focus beyond lobbying. Work is ongoing with the Communications Team to develop the approach.

Report sign off:

Rachel Crossley
Corporate Director of Service Reform and Strategy