

Equality Impact Assessment Screening Tool

1	Lead officer contact details: DALIAH BARRETT
2	Date: 23 <sup>rd</sup> May 2024
3	<p>Summary of the proposal: GAMBLING POLICY REVIEW</p> <p>Partnership working and exchange of information is supported by the Statement of Gambling Policy. In this way we hope to promote understanding between those providing gambling opportunities and those potentially affected by them. As with applications under other laws such as the Licensing Act 2003, we will seek to mediate between applicants and objectors and reach negotiated settlements wherever possible.</p> <p>From April 2016 gambling operators must conduct local risk assessments for their premises to demonstrate that they understand local issues and to show what measures they propose to introduce to mitigate against the risk of harm to children and vulnerable persons. (Gambling Commission’s Licensing Conditions and Codes of Practice responsibility code provision 10.1.1)</p> <p>Vulnerable people should be protected from harm. Who ‘vulnerable people’ are or the ways in which they may be vulnerable is not defined by the 2005 Act, though the Gambling Commission states that for regulatory purposes this is likely to include: <i>“people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.”</i> (Gambling Commission, 2012)</p> <p>The Gambling Commission’s Licence Conditions and Codes of Practice and Social Responsibility Code Provisions state that licensees must review (and update as necessary) their local risk assessments:</p> <ul style="list-style-type: none"><li>a. to take account of significant changes in local circumstance, including those identified in this policy;</li><li>b. when there are significant changes at a licensee’s premises that may affect their mitigation of local risks;</li><li>c. when applying for a variation of a premises licence; and</li><li>d. in any case, undertake a local risk assessment when applying for a new premises licence.</li></ul> <p>The council will expect the local risk assessment to consider the urban setting:</p> <ul style="list-style-type: none"><li>• The proximity of the premises to schools.</li><li>• The commercial environment.</li><li>• Factors affecting the footfall.</li></ul>

- Whether the premises is in an area of deprivation.
  - Whether the premises is in an area subject to high levels of crime and/or disorder.
  - The demographics of the area in relation to vulnerable groups.
  - The location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather.
  - The range of facilities in the local area such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities.
  - Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activity, etc.
  - The proximity of churches, mosques, temples or any other place of worship.
- The local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected:
- The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
  - Information held by the licensee regarding self-exclusions and incidences of underage gambling.
  - Arrangements in place for local exchange of information regarding self-exclusion and gaming trends.
  - Gaming trends that may mirror days for financial payments such as pay days or benefit payments.
  - Arrangements for monitoring and dealing with under age persons and vulnerable persons, which may include dedicated and trained personnel, leaflets, posters, self-exclusion schemes, window displays and advertisements not to entice passers-by etc.
  - The provision of signage and documents relating to games rules, gambling care providers and other relevant information,
  - The proximity of premises that may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor surgeries, council one stop shops, addiction clinics or help centres, places where alcohol or drug dependent people may congregate etc.
- The local risk assessment should show how children are to be protected:
- The proximity of institutions, places or areas where children and young people frequent such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas, etc.
  - The proximity of places where children congregate such as bus stops, cafes, shops etc.
  - Areas that are prone to issues of youths participating in anti-social behaviour, including activities such as graffiti, tagging, underage drinking etc.
- Other matters that the risk assessment may include:
- Details as to the location and coverage of working CCTV cameras, and how the system will be monitored.
  - The layout of the premises so that staff have an unobstructed view of persons using the premises.
  - The number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those persons using the premises.

<p>• Where the application is for a betting premises licence, other than in respect of a track, the location and extent of any part of the premises which will be used to provide facilities for gambling in reliance on the licence.</p> <p>Such information may be used to inform the decision the council makes about whether to grant the licence, to grant the licence with special conditions or to refuse the application. The policy does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome.</p> <p>The Equalities Impact Screening tool attempts to assess the likely impact of the revised policy on persons living, visiting and working within the borough. In Haringey, we currently have 50 betting shops, 10 Adult Gaming Centres, 2 Bingo premises and 2 track betting premises. These are located across the Borough with concentrations in the East of the Borough. The Gambling Policy Statement has scope to advance equality by promoting good relations and reduce inequality/protect vulnerable persons. The Statement supports a culture of openness where appropriate information can be accessed by all parties, hearings are generally held in public and enforcement is in line with the principles promoted within the enforcement concordat.</p>				
<b>Response to Screening Questions</b>		<b>Yes</b>	<b>No</b>	<b>Please explain your answer.</b>
<b>a) Type of proposal</b>				
4.	Is this a new proposal or a significant change to a policy or service, including commissioned service?		X	<p>The council has a statutory duty to prepare, publish and review its licensing policy under the Gambling Act 2005 every three years. The purpose of this policy is:</p> <ul style="list-style-type: none"> <li>to inform licence applicants of the way in which the Licensing Authority will make licensing decisions and how licensed premises are likely to be permitted to operate;</li> <li>to inform residents and businesses of the way in which the Licensing Authority will make licensing decisions and how their needs and concerns will be dealt with.</li> </ul>
5.	Does the proposal remove, reduce or alter a service or policy?	X		The guidance and information around local area profiles is a useful tool to assist the betting operator and Licensing Sub Committee when determining cases.

				<p>Underlying principle to treat all applications on their own merits</p> <ul style="list-style-type: none"> <li>• Policy improves transparency of decision making</li> <li>• Team shares application details with resident groups/ Citizen Panel members.</li> </ul> <p>At Committee hearings where applicants first language is not English and organises interpreters' where necessary</p>
6.	Will there be a restructure or significant changes in staffing arrangements? Please see the restructure pages for guidance for <a href="#">restructure EqlAs</a> .		X	
7.	If the service or policy is not changing, have there been any known equality issues or concerns with current provision. For example, cases of discrimination or failure to tackle inequalities in outcomes in the past?		X	<p>From April 2016 gambling operators must conduct local risk assessments for their premises to demonstrate that they understand local issues and to show what measures they propose to introduce to mitigate against the risk of harm to children and vulnerable persons. (Gambling Commission's Licensing Conditions and Codes of Practice responsibility code provision 10.1.1)</p> <p>Vulnerable people should be protected from harm. Who 'vulnerable people' are or the ways in which they may be vulnerable is not defined by the 2005 Act, though the Gambling Commission states that for regulatory purposes this is likely to include: <i>"people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs."</i> (GC, 2012)</p> <p><b>NB-</b> mental health, learning disability etc. have been defined as coming under the broader category of 'vulnerable' to gambling harm. However, all adults can be vulnerable to gambling harm, (<a href="https://committees.parliament.uk/publications/1626/documents/19602/default/">https://committees.parliament.uk/publications/1626/documents/19602/default/</a>, <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6650787/pdf/S1463423619000549a.pdf">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6650787/pdf/S1463423619000549a.pdf</a>), and in addition, the Act does not seek to prohibit particular groups of adults from gambling in the way it does children (e.g. 5.17 <a href="https://www.gamblingcommission.gov.uk/for-licensing-authorities/GLA/Part-5-Principles-to-be-applied-by-licensing-authorities.aspx">https://www.gamblingcommission.gov.uk/for-licensing-authorities/GLA/Part-5-Principles-to-be-applied-by-licensing-authorities.aspx</a>). As such, the policy itself does</p>

				not seek to have a blanket protection for adults with disabilities for example, but rather risks to individuals should be mitigated through individual risk assessments for operators and safeguarding procedures for residents where necessary.
<b>b) Known inequalities</b>				
8.	Could the proposal disproportionately impact on any particular communities, disadvantaged or vulnerable residents?		X	<p><b>AGE</b> – There are 56,718 children in Haringey aged 0-17 years, representing 21% of the population.</p> <p>Statistics for the Gambling Commission contained within the NatCen “Gambling behavior in Great Britain” show overall, the highest participation rates in any form of gambling activity were among adults aged between 25 and 64 (between 60% and 62%), while the lowest rates were found among the youngest and oldest age groups; 46% of 16 to 24 year olds and 47% of those aged 75 and over had gambled in the past year. <a href="https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2016.pdf">https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2016.pdf</a></p> <p>Actions and objectives are stated in the policy that will help protect vulnerable and young people and it is proposed to consult with head teachers of all schools within the Borough on the draft SGP.</p> <p>It is not however anticipated that the proposed policy will have a negative effect on the grounds of age.</p> <p><b>Sex-gender</b> – In Haringey, men have greater inequality in life expectancy than women across the social gradient (8 vs 3.2 fewer years for those living in the most deprived areas than those living in the least deprived areas).</p> <p>Statistics for the Gambling Commission contained within the NatCen “Gambling behavior in Great Britain” show overall, men were more likely to participate in most forms of gambling than women. Offline bingo was the only activity where men were less likely to participate than women (3% and 7%, respectively). Men were significantly more likely than women to have used an online bookmaker (13% and 2%, respectively) and to have placed an offline bet on a horse (12% and 7%, respectively) in the past year. Slot machines were also more popular among men than women (8% and 4%, respectively). And men were also more likely to have bet on sports events</p>

			<p>offline than women, with 9% of men and 1% of women.  <a href="https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2016.pdf">https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2016.pdf</a>  The revised SGP would have a neutral impact on the protected characteristic of Sex (gender).</p> <p><b>RACE-</b> Haringey has a young, ethnically diverse population. The total resident population in Haringey is 271,222 and BME or Other White ethnic groups account for 67% of the resident population.</p> <p>Statistics for the Gambling Commission contained within the NatCen “Gambling behavior in Great Britain” show gambling participation was highest among White adults; six in ten (59%) White adults had gambled in the past 12 months, compared with 46% of Black adults, 45% of adults in other minority ethnic groups and 32% of Asian adults. A similar pattern was evident among those who gambled on activities other than the National Lottery draws only. For online gambling the pattern was slightly different; similar proportions of adults in the White group and other minority ethnic groups had gambled online (both 10%), compared with 5% of Black adults and just 2% of Asian adults. <a href="https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2016.pdf">https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain-2016.pdf</a></p> <p>The Local Authority has established procedures for engaging with the diverse range of businesses within the Council area. Consultation on the new SGP will be undertaken with statutory consultees, including representatives from the business community. It is not however anticipated that the proposed policy will have a negative effect on the grounds of race.</p>
9.	<p>Is the service targeted towards particular disadvantaged or vulnerable residents?</p> <p><i>This can be a service specifically for a group, such</i></p>	X	<p><b>DISABILITY</b> – More than 19,500 people in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64. In the policy applicants are requested to have regard to the type of people that are likely to visit their premises in their application when identifying the steps, they will take to promote the licensing objectives. Applicants will be expected to propose steps to ensure that the physical</p>

	<i>as services for people with Learning Disabilities. It can also be a universal service but has specific measures to tackle inequalities, such as encouraging men to take up substance misuse services.</i>			<p>layout of the premises does not present any risks to 'vulnerable' people, some of whom may be disabled.</p> <p>During inspections, officers will refer any relevant details to planning if it is suspected there may be accessibility issues or a lack of planning permission. It is not however anticipated that the proposed policy will have a negative effect on the grounds of disability.</p>
10.	Are there any known inequalities? For example, particular groups are not currently accessing services that they need or are more likely to suffer inequalities in outcomes, such as health outcomes.		X	
11	If you have answered yes to at least one question in both sections a) and b), Please complete an EqIA.			<p>If a decision is taken not to proceed with a full EqIA, please document carefully your reasons here:</p> <p>The Gambling Policy has scope to advance equality by promoting good relations. The Statement supports a culture of openness where appropriate information can be accessed by all parties, hearings are generally held in public and enforcement is in line with the principles promoted within the Enforcement Concordat. Partnership working and exchange of information (within legal constraints) is also supported by the Statement. In this way we hope to promote understanding between those providing gambling opportunities and those potentially affected by them. As with applications under other laws such as the Licensing Act 2003, we will seek to mediate between applicants and objectors and reach negotiated settlements wherever possible. The Statement will be reviewed at least every three years and the impact of the Statement will form part of that review. Customer feedback forms will be used to facilitate this process.</p> <p>Consultation:  Publicity and information campaign  • Consultation details on website</p> <p>Direct mail out to</p>

				<ul style="list-style-type: none"><li>• Responsible authorities, including Police, Fire and Safeguarding Children,</li><li>• Neighbouring Boroughs</li><li>• Ward Councillors</li><li>• Licensees</li><li>• Faith Organisations /Citizen Panel</li></ul>
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