

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Adoption of Gambling Policy 2025-2028
Service Area:	Regulatory Services.
Officer Completing Assessment:	Daliah Barrett – Licensing Team Leader
Equalities Advisor:	Diptasri Basu.
Cabinet meeting date (if applicable):	15th October 2024.
Director/Assistant Director	Barry Francis.

2. Executive summary

2a Licensing authorities are required by the Gambling Act 2005 to publish a Statement of Principles that they propose to apply when exercising their functions under the 2005 Act. The Statement must be published at least every three years and can be reviewed from “time to time” with any amended parts re-consulted upon. The 2024-2025 Statement was circulated for consultation for a period of 6 weeks.

The objective of the Statement of Principles is to inform interested parties of the principles the licensing authority proposes to apply when exercising its functions under the Gambling Act 2005. The authority must have regard to the licensing objectives as set out in section 1 of the Act:

- Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.
 - Ensuring gambling is conducted in a fair and open way
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling
- The Licensing authority aims to permit the use of premises for gambling:
- In accordance with any relevant Code of Practice issued by the Gambling Commission.

- In accordance with any guidance issued by the Gambling Commission
- Reasonably consistent with the licensing objectives
- In accordance with the Authority's Statement of Gambling Policy.

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: *"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."* (Gambling Commission, 2012)

3. Consultation and engagement

3a. The consultation was undertaken by an online survey that was placed on the website and shared with elected members, residents' associations, Traders associations

In accordance with the Gambling Act 2005, a number of statutory consultees were engaged throughout the consultation. This included:

- the fire authority
- the police service
- the Gambling Commission
- Planning
- Environmental Health
- Child Protection
- HMRC

The gambling consultation was publicised via Communications Teams. Awareness was raised through use of social media.

3b. Deprivation has a significant impact on health and wellbeing. The Council areas of deprivation are largely located in the East of the borough - but many communities could also be considered deprived in terms of barriers to housing and essential services.

In Haringey, we currently have 50 betting shops, 10 Adult Gaming Centres, 1 Bingo premises and 1 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.

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.

4. Data and Impact Analysis

Consultation has identified negative impacts of gambling premises on children, vulnerable adults and those who are socioeconomically disadvantaged. However, insofar as the Gambling Act 2005 does not provide powers to local authorities to restrict gambling outfits in particular areas, sufficient mitigations cannot be made to tackle the negative impacts on vulnerable people with protected characteristics

4a. Age Data

Potential Impacts

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 layout of the premises does not present any risks to 'vulnerable' people, some of whom may be disabled.

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.

4c. Gender Reassignment

Data

Borough Profile⁶

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman – 0.1%
- Trans man - 0.1%

Target Population Profile

This policy does not target those protected by virtue of gender reassignment

Potential Impacts

This policy does not target those protected by virtue of gender reassignment

4d. Marriage and Civil Partnership

Note: Only the first part of the equality duty ("*Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act*") applies to this protected characteristic.

Data

Borough Profile⁷

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)
- Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%)
- Single (never married or never registered a same-sex civil partnership): (45.3%)
- Widowed or surviving partner from a same-sex civil partnership: (6.1%)

Target Population Profile

This policy does not target those protected by virtue of marriage or civil partnership

⁶ Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityinenglandandwales/2021)

⁷ Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/relationshipsandpartnerships/bulletins/marriageandcivilpartnershipstatusinenglandandwales/2021)

Potential Impacts

-
- This policy does not target those protected by virtue of marriage or civil partnership

4e. Pregnancy and Maternity

Note⁸:

- Pregnancy is the condition of being pregnant or expecting a baby.
- Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Data

Borough Profile ⁹

Live Births in Haringey 2021: 3,376

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Potential Impacts It is not anticipated that the proposed policy will have a negative effect on the grounds of pregnancy and maternity/paternity. **4f. Race**

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.¹⁰

Data

Borough Profile ¹¹

Arab: 1.0%

- Any other ethnic group: 8.7%

Asian: 8.7%

- Bangladeshi: 1.8%
- Chinese: 1.5%
- Indian: 2.2%
- Pakistani: 0.8%
- Other Asian: 2.4%

Black: 17.6%

- African: 9.4%

⁸ Equality and Human Rights Commission, 2022 – [Pregnancy and maternity discrimination](#).

⁹ Births by Borough (ONS)

¹⁰ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

¹¹ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

- Caribbean: 6.2%
- Other Black: 2.0%

Mixed: 7.0%

- White and Asian: 1.5%
- White and Black African: 1.0%
- White and Black Caribbean: 2.0%
- Other Mixed: 2.5%

White: 57.0% in total

- English/Welsh/Scottish/Northern Irish/British: 31.9%
- Irish: 2.2%
- Gypsy or Irish Traveller: 0.1%
- Roma: 0.8%
- Other White: 22.1%

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

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.

<https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain2016.pdf>

The Local Authority has established procedures for engaging with the diverse range of businesses within the Council area. Consultation on the new Statement of Gambling Policy 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.

The Local Authority has established procedures for engaging with the diverse range of businesses within the Council area. Consultation on the new SGP was 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.

4g. Religion or belief

Data

Borough Profile ¹²

- Christian: 39%
- Buddhist: 0.9%
- Hindu: 1.3%
- Jewish: 3.6%
- Muslim: 12.6%
- No religion: 31.6%
- Other religion: 2.3%
- Religion not stated: 8.0%
- Sikh: 0.3%

Target Population Profile

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Potential Impacts

It is not anticipated that the proposed policy will have a negative effect on the grounds of race

4h. Sex

Data

Borough profile ¹³

- Females: (51.8%)
- Males: (48.2%)

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

¹² Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/religiousandethnicgroups/articles/religion-england-and-wales-2021)

¹³ Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicity/articles/gender-identity-age-and-sex-england-and-wales-2021)

The revised Statement of Gambling Policy would have a neutral impact on the protected characteristic of Sex (gender)

4i. Sexual Orientation

Data

Borough profile ¹⁴

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- c) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- d) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

The revised Statement of Principles would have a neutral impact on the protected characteristic of Sexual Orientation

4j. Socioeconomic Status

Data

Borough profile

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023¹⁵
- 19.6% of residents were claiming Universal Credit as of March 2023¹⁶
- 29.3% of jobs in Haringey are paid below the London Living Wage¹⁷

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁸

¹⁴ Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/sexualorientationanddiversity/2021)

¹⁵ ONS – [ONS Claimant Count](https://www.ons.gov.uk/peoplepopulationandcommunity/employmentandearnings/bulletins/claimantcount/2023)

¹⁶ DWP, StatXplore – [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/universal-credit-statistics)

¹⁷ ONS – [Annual Survey of Hours and Earnings \(ASHE\) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics](https://www.ons.gov.uk/peoplepopulationandcommunity/employmentandearnings/bulletins/annualsurveyofhoursandearnings/ashe/2017)

¹⁸ DfE – [GCSE attainment and progress 8 scores](https://www.gov.uk/government/statistics/gcse-attainment-and-progress-8-scores)

- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁹
- 5.0% were qualified to level one only²⁰

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.²¹

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

- Statistics for the Gambling Commission contained within the NatCen "Gambling behaviour in Great Britain" show that adults in employment or training were most likely to have gambled in the past 12 months, with almost two thirds (63%) having spent money on any gambling activity. Over half of retirees (53%) and those who were unemployed (54%) had gambled in the past year, closely followed by adults who were otherwise economically inactive (49%). Those in full time education had the lowest levels of participation with around a third (32%) having gambled in the past 12 months. Excluding participation in National Lottery draws only, there was a different pattern of participation; in particular, unemployed adults had similar rates of gambling to those in employment or training (45% and 48% respectively). Those in employment were again the most likely group to gamble online, with 13% having done so in the past year. However, around one in ten (9%) full time students and those who were unemployed had gambled online in the past 12 months. Retirees were the least likely group to have gambled online, with 2% having done so. <https://www.gamblingcommission.gov.uk/PDF/surveydata/Gambling-behaviour-in-Great-Britain-2016.pdf>
- The Local Area Profile puts forward areas of concerns to focus the applicant on specific considerations for a given area.

5. Key Impacts Summary

No gap identified with regards to equalities and diversity and the Statement of Gambling Policy under the Gambling Act 2005. The Council Will ensure premises are considering their

¹⁹ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²⁰ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²¹ IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#)

own impact on vulnerable persons such as persons with disabilities or with gambling addictions during inspections. Continued engagement with the trade to ensure local area risk assessments are undertaken and these are suitable.

5a. Outline the key findings of your data analysis.

Assessment of impact and outcome

Protected characteristics	Issues taken from evidence	Outcome	Recommendations
Socio-economic	No adverse impact	low	N/A
Age	No adverse impact	low	N/A
Disability	No adverse impact	low	N/A
Pregnancy Maternity	No adverse impact	low	N/A
Race	No adverse impact	low	N/A
Religion /belief	No adverse impact	low	N/A
Sex gender	No adverse impact	low	N/A
Sexual Orientation	No adverse impact	low	N/A
Trangender	No adverse impact	low	N/A

Appendix 3A contains the data gathered from the responses received . The Cabinet report addresses if any impact on the policy in the table within the report at Table 1.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
- Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

Proper weight has been given to the views of all those consulted and, in particular, 'due regard' given to free text (literal) responses.

5c. Data Gaps

None known

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them **Y/N**

The legislation requires Councils to ‘aim to permit’

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **Y/N**

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **Y/N**

Not an option as we are required to have a policy in place.

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action:

Abide by the regulatory requirements set in the legislation.

Lead officer: **Daliah Barrett.**

Timescale: 15th October 2024

Please outline any areas you have identified where negative impacts will happen because of the proposal, but it is not possible to mitigate them.

Please provide a complete and honest justification on why it is not possible to mitigate the:

The aim to permit requirement is mandatory.

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

Date of EQIA monitoring review:

04th September 2024

8. Authorisation

EQIA approved by (Assistant Director/ Director) **[Type answer here].**

Date **04th September 2024**

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.