



# Equalities Analysis Assessment

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<b>Date</b>	<b>12/06/2023</b>	<b>Service</b>	<b>Safer Communities</b>	
<b>1. The activity or decision that this assessment is being undertaken for</b>				
The review of the Councils Statement of Licensing Principles for Gambling (the "Statement")				
<b>2. The protected characteristics or other equalities factors potentially impacted by this decision</b>				
<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity/ Race	<input checked="" type="checkbox"/> Religion or belief	<input type="checkbox"/> Language spoken	<input type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender/Sex	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Household type	
<input type="checkbox"/> Income	<input type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input type="checkbox"/> Socio Economic status	
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy and Maternity	<input type="checkbox"/> Refugee/ Migrant/ Asylum seeker	<input checked="" type="checkbox"/> Health & Social Care	
<input type="checkbox"/> Nationality	<input checked="" type="checkbox"/> Employment	<input type="checkbox"/> Armed forces		

The Statement sets out the principles the Council proposes to apply in exercising its functions under the Gambling Act 2005 during each three-year period. It plays a significant role in the council's duty to manage the risk of gambling-related harm in Lewisham and to regulate gambling activity to mitigate the risk of such harm.

The primary focus of the Statement is to promote the three licensing objectives set out in the Gambling Act 2005, which are:

- preventing 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, and
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

The aim of the Statement review is to identify and strengthen current measures and introduce new measures, if necessary, to uphold the licensing objectives identified above. The review aims to assess policies that enable the council to regulate gambling activity, and mitigate the risk of harm from gambling activity, and the risk of vulnerability to that harm.

In completing this EEA, we recognise that the Councils responsibilities are limited to premises-based gambling and do not extend to other gambling-related activities such as remote (online) gambling, gambling advertisements on television or other media, for example. The Gambling Commission regulates these activities. Also whilst we recognise the existence of gambling problems and harms, we recognise the limitations of the Statement and that it cannot be used to address the social causes of such harms.

On conclusion of the review and consultation, we will submit a report to Mayor and Cabinet. The report will ask the mayor and Cabinet to note the consultation responses and comment on any proposed changes to the Statement. We will also ask that Mayor and Cabinet recommend that the draft Statement be presented to full Council for determination, adoption, and publication.

### **3. The evidence to support the analysis.**

#### **Age:**

Research conducted by the Gambling Commission identified that young people and students, based on their age, are at a higher risk to gambling-related harm and problem gambling. Although young people and students are considered at a higher risk to gambling related harm, not all young people and students will suffer, or be at risk, of suffering harm. This Statement will not increase the chance of people not previously considered to be at risk, to succumb to gambling-related harm because of its implementation. Young people who are of working age but considered NEET (not in employment, education, or training) are likely to be at greater risk of gambling related harm.

### **Disability and Health:**

Research by the Gambling Commission on gambling behaviour in Great Britain conducted showed that people with gambling problems often experience a range of negative effects, including mental health issues with more severe cases leading to crime, thoughts of suicide, or suicide itself. Other aspects of mental health that may impact on an individual's vulnerability to suffering from gambling-related harm or problem gambling may include (but is not limited to) people suffering with depression, anxiety, schizophrenia, and bipolar disorders.

A proportion of mental health problems are a form of disability under the Equality Act 2010 if they have a long-term effect on the individual's normal day-to-day activity. These disabilities can include physical and mental conditions and it is considered that people who suffer from such disabilities may be more at risk. However, in this case it is likely to be people with mental disabilities who are at risk of gambling-related harm or problem gambling based on this characteristic.

### **Employment**

It is considered that people who are out of work, either because they are not of working age, because they are seeking work, or because they are long-term unemployed, are statistically more at risk of developing gambling-related issues, based on research conducted by the Gambling Commission.

### **Ethnicity/Race**

Statistics for the Gambling Commission contained within the NatCen Social Research "Gambling behaviour 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.

### **Gender Identity**

There is no evidence indicating that the proposal will lead to differential impact for people based on this protected characteristic.

### **Gender/sex**

Gambling Commission research including in its 'Strategy 2018-2021' showed that 6% of men and 1.9% of women are deemed 'at risk' of developing gambling problems and that men are more likely to be classed as problem gamblers. The NatCen Social Research "Gambling behaviour in Great Britain" research also shows 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 offline than women, with 9% of men and 1% of women.

However, whilst men may be at greater risk of participating in gambling and developing problem-gambling, this may have a further impact on women and families who are related to the men on a number of levels. For example, these women and families may well be more vulnerable themselves to developing problem-gambling or suffering from gambling-related harm because of the behaviour of men in their families.

### **Marriage and civil partnership**

The Gambling Commission research on problem gambling behaviour also concluded that people with gambling problems often experience relationship breakdowns.

Domestic abuse includes physical or sexual violence, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional, or other abuse. A proportion of these crimes may be linked to relationship breakdowns with gambling problems as a contributing factor. It is important to establish increasing trends in domestic abuse and whether the causes record gambling as a factor in the increase in incidence of domestic abuse.

### **Pregnancy and maternity**

There is no evidence indicating that the proposal will lead to differential impact for people based on this protected characteristic.

### **Religion/belief**

There is no evidence indicating that the proposal will lead to differential impact for people based on this protected characteristic.

### **Sexual orientation**

There is no evidence indicating that the proposal will lead to differential impact for people based on this protected characteristic.

- **Impact summary**

#### **Age**

- Young people are at higher risk to gambling-related harm and problem gambling.
- Young people of working age but considered NEET are likely to be at greater risk.
- Not all young people will suffer harm or be at risk of harm.
- The policy aims to mitigate the risk and will have a positive impact on this characteristic.

### **Disability and Health**

- People with gambling problems may experience a range of negative effects including health issues.
- It is likely the proposal would have a neutral impact on this characteristic.

### **Employment**

- People who are out of work are statistically more at risk of developing gambling related issues.
- It is likely the proposal would have a neutral impact on this characteristic.

### **Ethnicity/Race**

- White adults participate in gambling activity more than adults in other minority ethnic groups.
- It is likely the proposal would have a neutral impact on this characteristic.

### **Gender identity**

- There is no evidence indicating that the proposal will lead to differential impact.
- It is likely the proposal would have a neutral impact on this protected characteristic.

### **Gender/Sex**

- Men are more likely than women to be at risk of developing gambling related problems.
- Men are more likely to be classed as problem gamblers.
- It is unlikely that the proposal will lead to differential impact for people based on this protected characteristic.

### **Marriage and civil partnership**

- People with gambling problems often experience relationship breakdowns.
- Problem gambling may contribute to a proportion of domestic abuse crimes.
- It is likely the proposal would have a neutral impact on this characteristic.

### **Pregnancy and maternity**

- There is no evidence indicating that the proposal will lead to differential impact.
- It is likely the proposal would have a neutral impact on this protected characteristic.

### **Religion or belief**

- There is no evidence indicating that the proposal will lead to differential impact.

- It is likely the proposal would have a neutral impact on this protected characteristic.

### **Sexual Orientation**

- There is no evidence indicating that the proposal will lead to differential impact.
- It is likely the proposal would have a neutral impact on this protected characteristic.
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### **4. Mitigation**

This Equalities Analysis Assessment recognises that gambling problems and harms exist. The Statement aims to mitigate the harms caused directly by licensed premises and cannot be a mechanism to resolve the social causes and harms of problem gambling. The Statement aims to promote the three licensing objectives set out in the Gambling Act 2005, which are:

- preventing 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, and
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

We have made minimal changes to existing policies under the previous Statement. It remains likely the Statement will have a positive impact in respect of the age characteristic and a neutral impact in respect of all other characteristics.

### **5. Service user journey that this decision or project impacts**

Within society there are vulnerable people who may develop addictions to gambling. Whilst the law requires licensed gambling premises to monitor those who gamble regularly, historically this has been a difficult problem to deal with as adult safeguarding departments are not responsible authorities to tackle gambling behaviour.

The Gambling Statement of Licensing Principles supports a culture of openness where appropriate information can be accessed by all parties, hearings held in public, and enforcement is in line with the principles promoted within the enforcement regulations. It is acknowledged that partnership working, and exchange of information (within legal constraints) can promote understanding between applicants and decision makers. As with applications under other laws such as the Licensing Act 2003, the Council will seek to mediate between applicants and objectors and reach negotiated settlements wherever possible.

The mitigation measures set out above aim to deal with increased risks to equality groups by strengthening the framework and tools available to assess risks.

The requirement to complete risk assessments by applicants will result in an improved understanding and focus on local risks and mitigation of gambling-related harm.

The Statement will in turn benefit people with all protected characteristics, particularly people with low income, people suffering poverty and deprivation, people with disabilities, and young people or students who may be vulnerable to problem gambling, women, and families.

It is important to note, that not all people from equality backgrounds will suffer from problem gambling or succumb to gambling-related harm.

The Council's Licensing Team will review the risk assessments produced by applicants to ensure that they are sufficient. If the risk assessment is not deemed sufficient, the Licensing Team may challenge it and will request that the premises and or new applicants make alterations to their assessment, putting additional control, operational or security measures in place. Depending on the response from the premises, the authority may then decide to add conditions to the licence. In cases where the premises are still unable or unwilling to comply with the Council's requirements, the authority have the option to refuse the application where it fails to meet the necessary requirements.

The overall conclusion of the EAA is that by making only minor changes to the Statement and implementing the mitigation measures within it, the Council will be better placed to shield our most vulnerable equality groups from negative impacts because of this Statement. Any enforcement action that is taken in respect of the Gambling Statement of Licensing Principles is overseen by the Licensing Committee.

<b>Signature of Director</b>	
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## 1. Contacts

If you have any queries or require assistance with this guidance, please contact [policy@lewisham.gov.uk](mailto:policy@lewisham.gov.uk)