



Appendix 3

Equality Analysis

Plan Equality Impact Assessment

1a: Title of the EIA:

Gambling Policy 2013 - 2016

1b: What Category of EIA is this? Please tick one of following:

Part of Planned work	
Developing New Policies	
Changing/updating existing policies	X

1c: Who will do the EIA?

Name	Job Title	Relevant Roles & Responsibilities
T Mottram	Service Group Manager (Regulatory Services)	Project Lead Officer
C Collins	Licensing Manager	Manager of Licensing Team with responsibility for gambling enforcement and administration
K Giddings	Principle Licensing Officer	Officer specialising in Gambling Legislation and associated consultation and procedure development activities
J Abbott	Police Sergeant , Lewisham Police Licensing Unit	Partner Organisation Input
C Chown	Licensing Coordinator	Administrative support and Web Liaison

1d: Identify any other resources that are needed to support EIA:

Sufficient experience, equipment and printing/stationery budgets for consultation and objection handling process.

Analyse the Policy

2a: Briefly describe the aim of the policy:

Licensing authorities are required by the Gambling Act 2005 to publish a statement of the principles that they propose to apply when exercising their functions under the above legislation. The Statement must be published at least every three years. The statement must also be reviewed from "time to time" and any amended parts re-consulted upon before publication.

2b: Set out the policy objectives:

The objective of Lewisham's Gambling Policy is to inform interested parties of the principles that it proposes to apply when exercising its functions under the Gambling Act 2005. Lewisham licensing authority must have regard to the licensing objectives as set out in section 1 of the Act i.e

1. Preventing gambling from being a source of crime or disorder, being associated with crime or being used to support crime.
2. Ensuring that gambling is conducted in a fair and open way
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

2c: Break down the policy into its key areas:

Part A:

Consultation on the policy

Making representations regarding an application

Part B:

Premises Licences and other licensed Gambling Establishments (e.g. Adult Gaming Centres) making decisions about licence applications, permits, Temporary & Occasional Use Notices

2d: List the intended recipients of the policy:

Direct recipients of the policy are:

Operators/Managers of all premises with AWP machines (ie Public Houses and Clubs) in Lewisham.

Operators/Managers of all licensed betting offices in Lewisham

Operators/Managers of all licensed bingo halls in Lewisham

Operators/Managers of all registered Society Lotteries in Lewisham

Members of the Licensing Committee

Indirect recipients of the policy are all residents of Lewisham and those who visit Lewisham to use the above premises.

2e: Identify partner organisations and any other departments involved in delivering the policy:

The Gambling Commission
 The Metropolitan Police: Lewisham Police Station
 The London Fire Brigade
 Planning Department of the London Borough of Lewisham
 London Borough of Lewisham Child Protection Team
 HM Commissioners of Customs and Excise

2f: Identify and list any stakeholders concerned with the delivery of the policy:

The Metropolitan Police – Lewisham Police Station
 The Director for Children’s Services
 All known premises with AWP Machines, operators of licensed Betting Offices, licensed bingo halls and registered Society Lotteries
 Ward Councillors

Analyse the Equality issues of the Policy

Category	Age	Disability	Gender	Race	Religion/Belief	Sexual Orientation
Considered in EIA?	X				X	

Keys Areas:	All Associated Documents: For example: statements, forms, supporting policies etc	Equalities Analysis:
<p>Part A Consultation on the Gambling policy and making representations regarding a Licence application</p>	<p>Gambling Licensing Objectives as outlined in the Gambling Act 2005 and associated statutory instrument.</p> <p>Codes of Practice issued by the Gambling Commission.</p> <p>Codes of practice issued by the Department of Culture Media & Sport</p> <p>Lewisham’s Gambling Policy Statement</p>	<p>Age: References to age are made throughout all documents i.e Protecting children from being harmed or exploited by gambling is a key licensing objective enshrined in the legislation.</p>

Keys Areas:	All Associated Documents: For example: statements, forms, supporting policies etc	Equalities Analysis:
	<p>Licence Application forms and guidance produced by the Department of Culture Media & Sport</p> <p>Records of Statements received through the consultation process</p> <p>Records of representations made</p>	<p>Age: Lewisham's Gambling policy clearly restates the Gambling Commission's Guidance that this objective means preventing children from taking part in Gambling (as well as the restriction of advertising so that the gambling products are not aimed at or are, particularly attractive to children) Objections to a Licence application based on this key objective are treated as a valid objective.</p> <p>The list of persons this authority consults on the Gambling policy includes the Director for Children's Services.</p> <p>Religion/Belief This category is referred to in the associated documents i.e</p> <p>A:) the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Gambling act 2005.</p>

Keys Areas:	All Associated Documents: For example: statements, forms, supporting policies etc	Equalities Analysis:
		<p>B:) making a representation or objection to a licence application by an 'interested person'. This definition includes someone having a business interest that might be affected. The Gambling Commission's Guidance is that having a business interests should include charities and faith groups.</p> <p>C:) Moral objections are not a valid reason to reject applications for premises licence.</p>

Category	Age	Disability	Gender	Race	Religion/Belief	Sexual Orientation
Considered in EIA?	X				X	

Key Areas:	Quantitative Data: for example: monitoring information, performance indicators, borough benchmark data, customer surveys	Equalities Analysis:
<p>Part A Consultation on the Gambling policy and making representations regarding a Licence Application.</p> <p>Part B Making decisions about licence applications were representations and objections have been made</p>	<p>M3 database(specialist Licensing database) containing all details of licence applications, enforcement inspections and other performance data.</p> <p>Licensing filing system: a) hard copies of representations and objections, reports to licensing sub committee, decision taken by committee</p>	<p>Age/religion/Belief Gambling Policy consultation. This authority currently follows Government guidance and consults all Councillors, the Metropolitan Police, the Director for Children's Services, all known premises with AWP Machines and known operators of Betting Offices</p> <p style="text-align: right;">Cont</p>

Key Areas:	Quantitative Data: for example: monitoring information, performance indicators, borough benchmark data, customer surveys	Equalities Analysis:
	<p>b) Soft copies of above where available in team word folders</p> <p>C) Feedback documents from consultation exercise</p>	<p>Bingo Halls and registered Society Lotteries, all known Residents Associations and other adjoining Councils.</p> <p>With regards to the publication and distribution of information relating to proposed Licence applications, this authority complies with the minimum requirements.</p> <p>No publication of licence application on Web-site.</p> <p>Action – to publish Licence applications on Lewisham’s Web site.</p>

Category	Age	Disability	Gender	Race	Religion/Belief	Sexual Orientation
Considered in EIA?	X				X	

Key Areas:	Quantitative Data: for example: Customer opinion surveys, staff forums, focus groups, “Getting it right” feedback	Equalities Analysis:
<p>Part A Consultation on the Gambling policy and making representations regarding a Licence application</p>	<p>Customer complaints, compliments and surveys</p>	

Category	Age	Disability	Gender	Race	Religion/Belief	Sexual Orientation
Considered in EIA?	X				X	

Key Areas:	Quantitative Data: for example: Statements, forms, supporting policies etc	Equalities Analysis:
<p>Part B: Making decisions about licence applications where representations and objections have been made</p>	<p>Gambling Licensing Objectives as outlined in the Gambling Act 2005 and associated statutory instruments</p> <p>Codes of practice issued by the Gambling Commission</p> <p>Codes of practice issued by the Department of Culture Media & Sport</p> <p>Lewisham's Gambling Policy Statement</p> <p>Licence Application forms and guidance produced by the Department of Culture Media and Sport</p> <p>Records of statements received through the consultation process</p> <p>Records of representations made</p>	

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Key Areas:	Quantitative Data: for example: monitoring information, performance indicators, borough benchmark data, customer surveys	Equalities Analysis:
<p>Part B Making decisions about licence applications where representations and objections have been made</p>	<p>M3 database (specialist Licensing database) containing all details of licence applications, enforcement inspections and other performance data.</p> <p>Licensing filing system: d) hard copies of representations and objections, reports to licensing sub committee, decision taken by committee</p> <p>e) Soft copies of above where available in team word folders</p> <p>f) Feedback documents from consultation exercise</p>	<p>Age/Religion/Belief</p> <p>Reports to the Licensing Committee by licensing officers include details of application together with copies of all relevant representations and objections received from the consultation exercise</p>

Category	Age	Disability	Gender	Race	Religion/Belief	Sexual Orientation
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Key Areas:	Quantitative Data: for example: Customer opinion surveys, staff forums, focus groups, "Getting it right" feedback	Equalities Analysis:
<p>Part B Making decisions about licence applications where representations and objections have been made.</p>	<p>Customer complaints, compliments and surveys</p>	

Set out the Action Plan and Targets

Key Area	Equality Category	Proposed action/Targets	Key Mile Stones/Timescale	Who is responsible	Resources & training required
Consultation on the Gambling policy and making representations regarding a licence application	Age/religion/belief	To publish Licence applications on Lewisham's Web-Site	Jan 2013	C Chown	Web support may be required in order to overcome technical difficulties