

Estimated time taken to complete: 2 hours*

*Please note that this should be a working document and should be actively reviewed throughout the lifetime of the project/policy/service change



Revised Gambling Statement of Principles Equality Impact Assessment (EqIA) Form

March 2025 - March 2028

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|-------------------------------|--|
| Date created | November 2024 |
| Approved by | Assistant Director – Planning & Regulation |
| Owner | Head of Environmental Health & Licensing |
| Version | V1.1 |
| Author | Julie Dwan Acting Licensing Manager |
| Business Unit and Team | Environmental Health & Licensing |

Please [click this link](#) to find the EqIA guidance toolkit for support in completing the following form.

For translations, braille or large print versions of this document please email
equalities@stevenage.gov.uk.

First things first:

Does this policy, project, service, or other decision need an EqlA?

| | | |
|---|---|--|
| Title: | Revised Gambling Statement of Principles | |
| Please answer Yes or No to the following questions: | | |
| Does it affect staff, service users or the wider community? | Yes/No | |
| Has it been identified as being important to particular groups of people? | Yes/No | |
| Does it or could it potentially affect different groups of people differently (unequal)? | Yes/No | |
| Does it relate to an area where there are known inequalities or exclusion issues? | Yes/No | |
| Will it have an impact on how other organisations operate? | Yes/No | |
| Is there potential for it to cause controversy or affect the council's reputation as a public service provider? | Yes/No | |

| Where a positive impact is likely, will this help to: | |
|--|---------------|
| Remove discrimination and harassment? | N/A |
| Promote equal opportunities? | N/A |
| Encourage good relations? | Yes/No |

If you answered 'Yes' to one or more of the above questions you should carry out an EqlA.

Or if you answered 'No' to all of the questions and decide that your activity doesn't need an EqlA you must explain below why it has no relevance to equality and diversity.

You should reference the information you used to support your decision below and seek approval from your Assistant Director before confirming this by sending this page to equalities@stevenage.gov.uk.

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I determine that no EqlA is needed to inform the decision on the .

Name of assessor:

Decision approved by:

Role:

Role: Assistant Director

Date:

Date:

Equality Impact Assessment Form

For a policy, project, strategy, staff or service change, or other decision that is new, changing or under review

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|---|------------|---|------------|-----------------|--|
| What is being assessed? | | Revised Gambling Statement of Principles | | | |
| Lead Assessor | Julie Dwan | | | Assessment team | |
| Start date | March 2025 | End date | March 2028 | | |
| When will the EqIA be reviewed? (Typically every 2 years) | | November 2027, unless there are significant changes to the legislation which would require the Council to review the Gambling Statement of Principles sooner. | | | |

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| Who may be affected by the proposed project? | All residents and businesses within Stevenage, and gambling premises in particular. |
| What are the key aims of the proposed project? | To provide information and guidance on the general approach that the Council will take to licensing. The Statement does not prevent anyone from making an application, and each application will be considered on its individual merits. |

| | | | | | |
|--|-----|-----------------------------|-----|--------------------------|--|
| What positive measures are in place (if any) to help fulfil our legislative duties to: | | | | | |
| Remove discrimination & harassment | N/A | Promote equal opportunities | N/A | Encourage good relations | Promotion of better understanding between those providing gambling opportunities and |

| | | | | | |
|--|--|--|--|--|-------------------------------------|
| | | | | | those potentially affected by them. |
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| What sources of data / information are you using to inform your assessment? | Information provided by the Gambling Commission, feedback from the local consultation on the revised Statement and data collected in the Local Area Profile. |
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| In assessing the potential impact on people, are there any overall comments that you would like to make? | The purpose of the Council's Gambling Statement of Principles is to provide information and guidance on the general approach that the Council will take to licensing. The Statement does not prevent anyone from making an application, and each application will be considered on its individual merits. |
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Evidence and Impact Assessment

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

| Age | | | | | |
|--|--|-----------------|--|----------------|--|
| Positive impact | X | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | The Gambling Act has as an objective to protect children and vulnerable groups from being harmed. The policy embraces the promotion of this licensing objective and thus ensures that this age demographic is protected from certain licensable activities that may cause them harm. Each licence application is assessed on its merits and takes into account the views of all concerned, including those of the listed Responsible Authorities. However, we seek to minimise restrictions through the use of appropriate conditions, where possible, and only in extreme cases is there a refusal of an application. | | | | |

| | | | |
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| What opportunities are there to promote equality and inclusion? | N/A | What do you still need to find out? Include in actions (last page) | N/A |
|---|-----|--|-----|

| Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness | | | | | |
|---|---|-----------------|-------------------------------------|----------------|--|
| Positive impact | X | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | <p>The Gambling Act has as a licensing objective to 'protect children and vulnerable groups from being harmed and exploited by Gambling'. The policy embraces the promotion of this objective.</p> <p>It is difficult to define the term 'vulnerable person'. The Gambling commission, in its guidance to Local Authorities does not seek to offer a definition, but for regulatory purposes we will assume that this group includes people: 'Who gamble more than they want to, people who gamble beyond their means, elderly persons and people who may not be able to make informed or balanced decisions about gambling due to their mental impairment'. (Paragraph 6.9.7 of the policy refers)</p> <p>This policy seeks to protect vulnerable persons or those with such disabilities.</p> <p>Each licence application is assessed on its merits and takes into account the views of all concerned, including those of the listed Responsible Authorities. However, we seek to minimise restrictions through the use of appropriate conditions, where possible, and only in extreme cases is there a refusal of an application.</p> <p>Gambling operators when submitting an application for a gambling premises are required to provide a risk assessment and details of suitable measures which will be provided to protect children and vulnerable persons from harm or risk of being exploited by gambling. This includes the provision of training for employees focussing on their ability to detect a person who may be vulnerable and providing appropriate support for those persons.</p> | | | | |
| What opportunities are there to promote | N/A | | What do you still need to find out? | N/A | |

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|-------------------------|--|--------------------------------|--|
| equality and inclusion? | | Include in actions (last page) | |
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| Gender Reassignment | | | | | |
|--|-------------------------|-----------------|--|----------------|--|
| Positive impact | | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | No differential impact. | | | | |
| What opportunities are there to promote equality and inclusion? | N/A | | What do you still need to find out? Include in actions (last page) | N/A | |

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| Marriage or Civil Partnership | | | | | |
|--|-------------------------|-----------------|--|----------------|--|
| Positive impact | | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | No differential impact. | | | | |
| What opportunities are there to promote equality and inclusion? | N/A | | What do you still need to find out? Include in actions (last page) | N/A | |

| Pregnancy & Maternity | | | | | |
|-----------------------|--|--|--|--|--|
|-----------------------|--|--|--|--|--|

| Positive impact | | Negative impact | | Unequal impact | |
|--|-------------------------|-----------------|--|----------------|--|
| Please evidence the data and information you used to support this assessment | No differential impact. | | | | |
| What opportunities are there to promote equality and inclusion? | N/A | | What do you still need to find out? Include in actions (last page) | N/A | |

| Race | | | | | |
|--|-------------------------|-----------------|--|----------------|--|
| Positive impact | | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | No differential impact. | | | | |
| What opportunities are there to promote equality and inclusion? | N/A | | What do you still need to find out? Include in actions (last page) | N/A | |

| Religion or Belief | | | | | |
|--|-------------------------|-----------------|--|----------------|--|
| Positive impact | | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | No differential impact. | | | | |

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| What opportunities are there to promote equality and inclusion? | N/A | What do you still need to find out? Include in actions (last page) | N/A |
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| Sex | | | | | |
|--|-------------------------|--|-----|----------------|--|
| Positive impact | | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | No differential impact. | | | | |
| What opportunities are there to promote equality and inclusion? | N/A | What do you still need to find out? Include in actions (last page) | N/A | | |

| Sexual Orientation e.g., straight, lesbian / gay, bisexual | | | | | |
|--|-------------------------|--|-----|----------------|--|
| Positive impact | | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | No differential impact. | | | | |
| What opportunities are there to promote equality and inclusion? | N/A | What do you still need to find out? Include in actions (last page) | N/A | | |

| Socio-economic¹ e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement | | | | | |
|--|--|-----------------|--|----------------|--|
| Positive impact | X | Negative impact | | Unequal impact | |
| Please evidence the data and information you used to support this assessment | <p>The Gambling Act has as an objective to protect children and vulnerable groups from being harmed. The policy embraces the promotion of this licensing objective and thus ensures to protect those people who may be at risk of gambling harms due to their social or economic status.</p> <p>The Council engages with Hertfordshire Public Health and the Hertfordshire Gambling harms Alliance in the development of this statement of principles and the Local Area Profile which accompanies it. The Local Area Profile is referred to throughout this statement and helps the Council to identify areas of Stevenage where people may be more at risk of gambling harms due to their social and economic status.</p> <p>Each licence application is assessed on its merits and takes into account the views of all concerned, including those of the listed Responsible Authorities. However, we seek to minimise restrictions through the use of appropriate conditions, where possible, and only in extreme cases is there a refusal of an application.</p> | | | | |
| What opportunities are there to promote equality and inclusion? | N/A | | What do you still need to find out? Include in actions (last page) | N/A | |

| Additional Considerations Please outline any other potential impact on people in any other contexts | | | | | |
|--|-----|-----------------|--|----------------|--|
| Positive impact | | Negative impact | | Unequal impact | |
| Please evidence the data and information | N/A | | | | |

¹Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

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| you used to support this assessment | | | |
| What opportunities are there to promote equality and inclusion? | | What do you still need to find out? Include in actions (last page) | |

Consultation Findings

Document any feedback gained from the following groups of people:

| Staff? | None | Residents? | None |
|-------------------------------|------|------------|--|
| Voluntary & community sector? | None | Partners? | <p>Consultation responses have been received from two Responsible Authorities. Stevenage Borough Council Planning Department, and Hertfordshire Safeguarding Adults Board</p> <p>The Planning Department have asked for the post 'Development Control Manager' referenced on page 61 to be replaced with 'Head of Planning and Enforcement' to avoid communications relating to licensing matters being missed.</p> <p>Hertfordshire Safeguarding Adults Board have provided a copy of the Hertfordshire Safeguarding Children Partnership Gambling Policy Statement.</p> <p>Hertfordshire Public Health -Are pleased that the Council's statement of principles includes a section on 'Public Health and gambling' and have provided sources of evidence which they recommend including as references evidence of the harms caused by problem gambling. They refer to the Hertfordshire Gambling Harms Strategy, which is to be launched in early 2025, one of</p> |

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| | | | the strategic priorities included in the strategy is 'Influencing the licensing and regulatory environment' to protect vulnerable residents from the harm caused by gambling and be clear on the individual roles of the County Council and district and borough Councils. Public Health have recommended that 6.12 of the draft policy (Location) includes that applications will be considered against the cumulative impact of applications locally to protect children and vulnerable persons from being harmed or exploited by gambling |
| Other stakeholders? | <p>Two Consultation responses have been received from GambleAware and Gamcare. These are organisations which offer free, confidential information, advice and support for people affected by gambling harm. GambleAware have provided some useful links to interactive maps to show the prevalence of problem gambling and its severity in each local authority as well as usage of, and reported demand for treatment and support for gambling harms.</p> <p>GambleAware are supportive of local authorities which conduct analysis to identify areas with increased risk levels. In particular they support those who also include additional licence requirements to mitigate the increased level of risk. Areas where there are higher than average resident or visiting populations from groups we know to be vulnerable to gambling harms include children, the unemployed, the homeless, certain ethnic-minorities, lower socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services.</p> <p>Gamcare welcome the position the Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in it's statement of principles and express the importance of the Council developing a local picture of the level of gambling harms. In the absence of cumulative Impact Assessments as a method to which the 'aim to permit' approach can be challenged; Stevenage council should continue to pursue a Local Area Profile approach that specifically analysis gambling risk and use this data as a basis to scrutinise and possibly oppose a licensing application. It is also suggested that the changes to the Council's statement of principles should be viewed in the context of the Gambling Act Review and the process of the white paper consultations.</p> | | |

Overall Conclusion & Future Activity

| Explain the overall findings of the assessment and reasons for outcome (please choose one) : | | |
|--|-------------------------|---|
| 1. No inequality, inclusion issues or opportunities to further improve have been identified | | <p>The statement is intended to aid with local decision making in conjunction with the Gambling Act 2005 and the Gambling Commission's guidance to licensing authorities.</p> <p>The statement supports a culture of openness where appropriate information can be accessed by all parties. Licensing Committee hearings, when required, will generally be held in public and any enforcement will be in line with the principles promoted within the Regulators' Code. Partnership working and exchange of information (within legal constraints) is also supported with a view to promoting better understanding between those providing gambling opportunities and those potentially affected by them.</p> <p>The Gambling Act has as an objective to protect children and vulnerable groups from being harmed. The policy embraces the promotion of this licensing objective and thus ensures that the age demographic, those with disabilities and those at risk of gambling harms because of their social or economic status are protected from certain licensable activities that may cause them harm. The Council will seek to mediate between applicants and objectors and reach negotiated settlements wherever possible.</p> |
| Negative / unequal impact, barriers to inclusion or improvement opportunities identified | 2a. Adjustments made | |
| | 2b. Continue as planned | |
| | 2c. Stop and remove | |

| Detail the actions that are needed as a result of this assessment and how they will help to remove discrimination & harassment, promote equal opportunities and / or encourage good relations : | | | | |
|--|---|---------------------|----------|---|
| Action | Will this help to remove, promote and / or encourage? | Responsible officer | Deadline | How will this be embedded as business as usual? |

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| N/A | | | | |
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Approved by Assistant Director / Strategic Director: Zayd Al Jawad

Date: 11th November 2024

Please send this EqlA to equalities@stevenage.gov.uk for critical friend feedback and for final submittance with the associated project.