



SOUTH KESTEVEN
DISTRICT COUNCIL

Equality Impact (Initial Analysis)

Gambling Statement of Principles

Service Area: Public Protection	Lead officer: Heather Green	Date of Meeting 05/07/22
	Assessors: Heather Green	
	Neutral Assessor: Kati Conway	

1. Name and description of policy/service/function/strategy

Licensing Authorities issue licences for gambling premises and issue a range of permits to authorise other gambling facilities in their area.

The Gambling Act 2005 requires Authorities on or before each successive period of three years, to prepare a Statement of Principles that they propose to apply in the exercise of their functions under the Act and to publish that Statement. The last Statement was published in January 2020 and is now under review.

The Statement sets out the Licensing Authorities approach to regulation and aims to control operators of licensed premises within the local area.

The licensing objectives are set out in the Act and 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
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

Is this a new or existing policy? Existing

2. Complete the table below, considering whether the proposed policy/service/function/strategy could have any potential positive, or negative impacts on groups from any of the protected characteristics (or diversity strands) listed, using demographic data, user surveys, local consultations evaluation forms, comments and complaints etc.

Equality Group	Does this policy/service/function/strategy have a positive or negative impact on any of the equality groups? Please state which for each group	Please describe why the impact is positive or negative. If you consider this policy etc is not relevant to a specific characteristic please explain why
Age	Positive – under 18s	The statement sets out how the Licensing Authority will consider applications in accordance with licensing objectives. It also outlines the Gambling Commission Licence Conditions and Codes of Practice (LCCP issued October 2020) requiring operators to consider the local risks to their application.

		<p>One is to protect children from being harmed or exploited by gambling. Premise Licence applicants must consider a range of relevant factors in their risk assessment as part of their application, setting out measures the licensee has in place to address specific issues e.g. locations near schools, playgroups, community groups and where young people may congregate.</p>
Disability	Positive – in respect of mental health and learning disability	<p>This policy outlines measures that venues and staff at these venues are aware of vulnerable groups, are alert to excessive gambling and provide appropriate information for organisations or charities that provide help such as GamCare.</p> <p>Where venues are operating outside of conditions or without appropriate permits, a range of enforcement provisions are available in the Act.</p>
Race	Neutral	<p>This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.</p>
Gender Reassignment	Neutral	<p>This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.</p>
Religion or Belief	Neutral	<p>This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.</p>

		Locations wishing to become a gambling location would need to undertake risk assessments of the local area and seek relevant planning permission.
Sex	Neutral	This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.
Sexual Orientation	Neutral	This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.
Pregnancy and Maternity	Neutral	This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.
Marriage and Civil Partnership	Neutral	This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.
Carers	Neutral	This policy has general protection levels and terms of operating for anyone wishing to provide gambling facilities or gamble. The policy, whilst not being determined by this individual protected characteristic has been put place to ensure standards are met and licences are issued on an equitable basis.

<p>Other Groups (e.g. those from deprived (IMD*) communities; those from rural communities, those with an offending past)</p> <p>*(IMD = Indices of multiple deprivation)</p>	<p>Positive - Vulnerable persons, for regulatory purposes Gambling Commission guidance states “assume that this group includes 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 mental health needs, learning disability, or substance misuse relating to alcohol or drugs.”</p>	<p>This policy outlines measures that venues and staff at these venues are aware of vulnerable groups including those with gambling dependencies would be protected and are alert to excessive gambling and provide appropriate information for organisations that provide help such as GamCare.</p> <p>Operators when considering the local risks, must evidence how they would address issues regarding vulnerable people unable to make informed, balanced decisions.</p> <p>Where venues are operating outside of conditions or without appropriate permits, a range of enforcement provisions are available in the Act.</p>
<p>General comments</p>		

3. What equality data/information did you use to inform the outcomes of the proposed policy/service/function/strategy? (Note any relevant consultation who took part and key findings)

The current Statement (2020-2023) was subject to consultation. A range of licences/permits have been issued under the current statement and no significant risks have been identified. However, in line with current guidance, the Statement of Principles outlines considerations relating to children and vulnerable people.

If there are any gaps in the consultation/monitoring data, how will this be addressed?

The revised Statement will be subject to consultation statutory consultees, relevant bodies and the public.

4. Outcomes of analysis and recommendations (please note you will be required to provide evidence to support the recommendations made): Please check one of the options.

a)	No major change needed: equality analysis has not identified any potential for discrimination or for negative impact and all opportunities to promote equality have been taken	<input checked="" type="checkbox"/>
<i>If you have checked option a) you can now send this form to the Lead Officer and your Neutral Assessor for sign off</i>		
b)	Adjust the proposal to remove barriers identified by equality analysis or to better promote equality.	<input type="checkbox"/>
<i>If you have checked option b) you will need to answer questions b.1 and b.2</i>		
c)	Adverse impact but continue	<input type="checkbox"/>
<i>If you have checked option c) you will need to answer questions c.1</i>		
d)	Stop and remove the policy/function/service/strategy as equality analysis has shown actual or potential unlawful	<input type="checkbox"/>

b.1 In brief, what changes are you planning to make to your proposed policy/service/function/strategy to minimise or eliminate the negative equality impacts?

b.2 Please provide details of whom you will consult on the proposed changes and if you do not plan to consult, please provide the rationale behind that decision.

If you have checked option b) you will need to complete a Stage 2 equality analysis

c.1 Please provide an explanation in the box below that clearly sets out your justification for continuing with the proposed policy/function/service/strategy.

If you have checked option c) you will need to complete a Stage 2 equality analysis. You should consider in stage 2 whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Signed (Lead Officer):
(Name and title)

Heather Green
Licensing Team Leader

Date completed:

30/6/2022

Signed (Neutral Assessor):
(Name and title)

Kati Conway – Senior Neighbourhoods Officer

Date signed off:

05/07/22