



Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)

Name of proposal	Policy for the licensing of gambling premises and permits
Directorate and Service Area	Neighbourhoods – Regulatory Services
Name of Lead Officer	Nick Carter – Regulatory Services Manager

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

This is an equalities impact assessment of the Council's draft policy for the licensing of gambling premises and permits. Under Gambling Act 2005 local authorities are responsible for issuing premises licences, permits and notices in respect of gambling premises.

The city council are required to adopt a gambling policy every three years, the first of which came into effect on 31 January 2007. A further review was undertaken and came into effect on 31 January 2016. We now need to prepare and publish a new policy by 31 January 2019.

Function of the Policy

The gambling policy may be referred to by officers and members of committees when determining licensing applications and is available for all parties when applying for licences and submitting representations. As mentioned above this policy is relevant to various permissions and authorisations under the Gambling Act 2005 relating to gambling premises and permits, there are separate policies for other areas of licensing e.g. alcohol and entertainment, street trading, taxis and sexual entertainment venues.

The policy has served the council well and has not been subject to any challenge since implementation. The licensing of gambling related activities is a

well regulated low risk licensing function. It is not anticipated that there will be any need to change the policy other than some drafting amendments to reflect some minor amendments to guidance/legislation since the last policy was adopted. The legislation sets out a consultation process and framework which the council has a statutory responsibility to follow.

The Licensing Authority's role is limited as we licence premises and related activities e.g. Amusements with prizes (AWP) machines in licensed premises. The bulk of policy and operations are held with the Gambling Commission, which licences and regulates the operators through issuing operating licences.

Our experience of processing gambling act applications is that they are non-contentious. Since the legislation came into force only two applications have been referred to the Licensing Committee for determination. Both applications were for betting premises licences and representations were received from interested parties. The applications were both granted by the Licensing Committee.

Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

2.1 What data or evidence is there which tells us who is, or could be affected?

General

The Council's Gambling Policy covers the whole of Bristol. Any resident of the City of Bristol who engages in gambling with licensed operators has the potential to be affected.

Licence or permit holders

We currently licence 8 Adult Gaming Centres, 59 betting premises, 1 track betting premises, 3 bingo premises, 5 casinos, 73 lottery registrations and 278 permits (this includes notification of 2 or less machines or permits for 3 or more machines in alcohol licensed premises).

There is no data available specifically in respect of the demography of licence or permit holders in Bristol. This is primarily because the application forms are prescribed by the Home Office and currently do not request equalities information. Furthermore licence holders are often businesses. Therefore

when considering the impact on licence holders and the public we need to rely on data covering the whole of the city whilst bearing in mind that spatially the demography of Bristol varies.

The Gambling Commission gathers national data on gambling participation, detailed below;

- 45% of people have gambled in the last four weeks
- 48% of men have gambled in the last four weeks
- 41% of women have gambled in the last four weeks
- 18% of people have gambled online in the last four weeks

Age

Children were explicitly identified as being vulnerable to harm in the Gambling Act 2005. National data indicates younger people are the age group most likely to gamble.

The 2011 Census tells us that;

- The median age of people living in Bristol is 33 compared to the UK median of 39. The age profile of people using the NTE would be the median age and younger.
- 8.3% of students make up the population in Bristol,

Health and lifestyle Related Data

GamCare is the leading national provider of information, advice, support and free counselling for the prevention and treatment of problem gambling. GamCare highlights the impact of gambling on mental health. *'According to the Royal College of Psychiatrists problem gamblers are more likely than others to suffer from low self-esteem, develop stress-related disorders, to become anxious, to have poor sleep and appetite, to develop a substance misuse problem and to suffer from depression'.*

Gender

The Gambling Commission data indicates that both men and women gamble – men are about 5% more likely to gamble than women. GamCare data of 30 000 callers each year indicates that both men and women can develop problem gambling habits and men and women gamble in different ways. Men are more likely to use betting shops and women are more likely to use fruit machines and Bingo.

Ethnicity

We do not have data on the ethnicity of people who gamble. The 2007 and 2010 British Gambling Prevalence Surveys have shown a consistent relationship between ethnicity and the people who gamble. In both studies, problem gambling prevalence rates were higher among those from non-White ethnic backgrounds. More recently, Gamcare have included information on the ethnicity of their 30,000 callers a year who report concerns about their own gambling, or the gambling of a family member or partner.

Gamcare indicates problem gambling affects people of all ethnicities therefore we can assume that BME people gamble in similar proportions to their representation within the community. The 2011 Census shows us that about 16% of the Bristol population are from minority ethnic groups.

Disability

We could not identify research or data relating to gambling and disabled people.

- 16.8% of the population of Bristol have a disability or long term health problem (Census 2011).

Sexual Orientation

We could not identify research or data relating to gambling and LGB people. However responsible gambling in Australia highlights that for LGB people casinos can be anonymous places and that gambling problems for LGB people are often secondary to another concern.

- Approximately 6% of population of Bristol are LGB.

Transgender

We could not identify research or data relating to gambling and people who are transgender

Religion and belief

There is no data on what proportion of people with a faith and those with no faith participate in gambling.

- 46.8% of the population of Bristol identified as Christian in 2011 Census. Compared to 62.1% 2001 Census.
- 37.4% of population of Bristol identified that they have no religion and 5.0% as Muslim (Census 2011).

2.2 Who is missing? Are there any gaps in the data?
There are significant gaps in data and a lack of information available in relation to local gambling.
2.3 How have we involved, or will we involve, communities and groups that could be affected?
There is a consultation process to be undertaken and communities and equalities groups will be included.

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?
<p>No negative impact anticipated but each licence application, where representations are made, will be considered against the three key Gambling Act objectives, namely:</p> <ol style="list-style-type: none"> 1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime, 2. ensuring that gambling is conducted in a fair and open way, and 3. protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Age</p> <p>This policy will have a Positive impact on age. Actions and objectives are stated in the policy that will help protect vulnerable and young people.</p> <p>The policy at 3.5 outlines what the licensing authority's duty is in and what the Council expects from licence holders in respect of protecting young people from harm.</p> <p>The policy makes provision for Children and Young Peoples services to act as the responsible authority for matters relating to the protection of children from harm and enables them to comment on variations/new applications and request reviews of licences.</p> <p>Disability</p>

No positive or negative impact anticipated but each licence application, where representations are made, will be considered against the three key Gambling Act objectives, namely:

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

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.

Ethnicity and race

The policy will ensure that all services are aware of the need to abide by the Equality Act (2010)

Sex and Gender

There is some evidence to support a higher risk of problem gambling in men rather than women. In 2015-16 over 70% of calls to Gamcare support-line were from men, and the majority of calls from women were as an 'affected other'.

http://www.gamcare.org.uk/sites/default/files/file_attach/GamCare%20Annual%20Statistics%202015-16.pdf

Pregnancy and maternity

No expected impact

LGBT

No expected impact

Religion and belief

Most religions do not condone gambling for money; consequently some sectors could view the gambling policy as an endorsement of this kind of activity. There is however no expected impact.

Gender re-assignment

No expected impact

Marriage and Civil Partnership No expected impact
3.2 Can these impacts be mitigated or justified? If so, how?
The policy is designed to meet the needs of all applicants and the general public and ensure that applications are dealt with on their own merits.
3.3 Does the proposal create any benefits for people with protected characteristics?
The policy makes provision for Children and Young Peoples services to act as the responsible authority for matters relating to the protection of children from harm and enables them to comment on variations/new applications and request reviews of licences.
3.4 Can they be maximised? If so, how?

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

4.1 How has the equality impact assessment informed or changed the proposal?	
There are no significant issues arising from this assessment.	
4.2 What actions have been identified going forward?	
The EqIA will be reviewed in the event of any equalities issues being raised by respondents to the consultation and will be updated after the consultation is concluded.	
4.3 How will the impact of your proposal and actions be measured moving forward?	
The next stage is for the policy to undergo a public consultation which will run for either 8 or 12 weeks pending statutory timescales. After this the policy will be considered by the Cabinet and if approved will be presented to the Full Council recommending that the policy be adopted.	
Service Director Sign-Off:  Rizwan Tariq	Equalities Officer Sign Off:  Duncan Fleming
Date: 28/9/2018	Date: 8/5/2018

