

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

<b>Subject / Title</b>	Revised Gambling Policy 2019-22
------------------------	---------------------------------

<b>Team</b>	<b>Department</b>	<b>Directorate</b>
Licensing	Public Protection	Neighbourhood and Operations

<b>Start Date</b>	<b>Completion Date</b>
16 July 2018	

<b>Project Lead Officer</b>	Mike Robinson
<b>Contract / Commissioning Manager</b>	Sharon Smith
<b>Assistant Director/ Director</b>	Emma Varnam

<b>EIA Group</b> (lead contact first)	<b>Job title</b>	<b>Service</b>
Emma Varnam	Assistant Director	Neighbourhood and Operations
Sharon Smith	Head of Public Protection	Public Protection
Mike Robinson	Regulatory Services Manager	Licensing

### **PART 1 – INITIAL SCREENING**

*An Equality Impact Assessment (EIA) is required for all formal decisions that involve changes to service delivery and/or provision. Note: all other changes – whether a formal decision or not – require consideration for an EIA.*

*The Initial screening is a quick and easy process which aims to identify:*

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

- those projects, proposals and service or contract changes which require a full EIA by looking at the potential impact on any of the equality groups
- prioritise if and when a full EIA should be completed
- explain and record the reasons why it is deemed a full EIA is not required

A full EIA should always be undertaken if the project, proposal and service / contract change is likely to have an impact upon people with a protected characteristic. This should be undertaken irrespective of whether the impact is major or minor, or on a large or small group of people. If the initial screening concludes a full EIA is not required, please fully explain the reasons for this at 1e and ensure this form is signed off by the relevant Contract / Commissioning Manager and the Assistant Director / Director.

<b>1a.</b>	<b>What is the project, proposal or service / contract change?</b>	Amendments to the Council's Gambling Policy, in line with the Gambling Act 2005, the Council are required to review the policy at least every three years
<b>1b.</b>	<b>What are the main aims of the project, proposal or service / contract change?</b>	The Gambling Act 2005 requires the Council, to update the existing statement of licensing policy in order to keep the policies relevant and up-to-date.

#### **1c. Will the project, proposal or service / contract change have either a direct or indirect impact on any groups of people with protected equality characteristics?**

**Where a direct or indirect impact will occur as a result of the project, proposal or service / contract change please explain why and how that group of people will be affected.**

Protected Characteristic	Direct Impact	Indirect Impact	Little / No Impact	Explanation
Age	✓			The Policy seeks to promote the licensing objectives under the Gambling Act 2005, one of which is "Protecting children and other vulnerable people from being harmed or exploited by gambling".

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

				<p>The Policy makes reference to the methods that will be used to ensure children are protected, including:</p> <ul style="list-style-type: none"> <li>• Designating the Local Safeguarding Children Board for the purpose of advising the authority about the protection of children from harm</li> <li>• Ensuring premises are configured so that children are not invited to participate in, have accidental access to or closely observe gambling</li> <li>• Making sure entrances to and exits from parts of a building covered by one or more premises licences are separate and identifiable so that the separation of different premises is not compromised and people do not drift into a gambling area</li> <li>• Ensuring no entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons</li> <li>• A restriction of advertising so that gambling products are not aimed at or are particularly attractive to children</li> <li>• Potential supervision of entrances/machines, segregations of areas in</li> </ul>
--	--	--	--	--

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

				<p>premises “ready for gambling”</p> <ul style="list-style-type: none"> <li>• Requiring operators to ensure all staff are trained at gambling premises</li> <li>• Requiring operators to ensure all customers are supervised when on gambling premises</li> <li>• Requiring operators to have a procedure for identifying customers who are at risk of gambling related harm</li> <li>• That children are not permitted to participate in bingo on bingo premises and if category B or C machines are made available, these must be separated from areas where children and young people are allowed</li> <li>• Require premises licence applicants for tracks to ensure that children do not have access to adult only gaming facilities at the tracks</li> <li>• Expecting operators to consider institutions, places or areas where children or young people might be present; any premises where children congregate; areas prone to youths participating in anti-social behaviour; recorded incidents of attempted underage gambling when completing their risk</li> </ul>
--	--	--	--	---

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

				assessment  As these aspects of the policy are designed to prevent children and young people from gambling, they will have a direct impact on children and young people.
Disability			✓	
Ethnicity			✓	
Sex			✓	
Religion or Belief		✓		<p>The Policy states that “Interested parties can make representations about licence applications, or apply for a review of an existing licence” if the party “has business interests that might be affected by the authorised activities”</p> <p>The Policy will also consider the Gambling Commission’s Guidance that ‘business interests’ should be given the widest possible interpretation and include faith groups.</p> <p>The Policy states that other issues that may be considered could include “Matters of faith, including all religious or faith denominations. Including proximity to churches, mosques, temples or any other place of worship” Therefore the policy may impact on religious groups due to the fact they are invited to provide views about licence applications.</p>

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

Sexual Orientation			✓	
Gender Reassignment			✓	
Pregnancy & Maternity			✓	
Marriage & Civil Partnership			✓	
<b>Other protected groups determined locally by Tameside and Glossop Strategic Commission?</b>				
Group (please state)	Direct Impact	Indirect Impact	Little / No Impact	Explanation
Mental Health			✓	
Carers			✓	
Military Veterans			✓	
Breast Feeding			✓	
<b>Are there any other groups who you feel may be impacted, directly or indirectly, by this project, proposal or service / contract change? (e.g. <i>vulnerable residents, isolated residents, low income households, those who are homeless</i>)</b>				
Group (please state)	Direct Impact	Indirect Impact	Little / No Impact	Explanation
Vulnerable People	✓			<p>The Policy seeks to promote the licensing objectives under the Gambling Act 2005, one of which is "Protecting children and other vulnerable people from being harmed or exploited by gambling".</p> <p>The Policy makes reference to the</p>

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

				<p>methods that will be used to ensure vulnerable people are protected, including:</p> <p>The Policy notes “as regards the term ‘vulnerable persons’ it is noted that the Gambling Commission does not seek to offer a definition but states that ‘it will for regulatory purposes 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 a mental impairment, alcohol or drugs’. This licensing authority will consider this licensing on a case by case basis. Should a practical definition prove possible in future then this policy statement will be updated with it, by way of a revision.’</p> <p>In terms of regulation the Policy states:</p> <ul style="list-style-type: none"> <li>• TMBC will take into account the ability of staff to monitor the use of betting machines by vulnerable people when considering the number/nature/circumstances of betting machines an operator wants to offer</li> <li>• TMBC will consider the need of Tracks to ensure that entrances to each type of premises are distinct and the protection of children and vulnerable persons from being harmed or exploited</li> </ul>
--	--	--	--	--

## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

				<p>by gambling</p> <ul style="list-style-type: none"> <li>• In regards to (Alcohol) Licensed premises gaming machine permits, such matters will be decided on a case by case basis, but there will be regard to the need to protect vulnerable persons</li> <li>• As regards the protection of vulnerable persons applicants, for (Alcohol) Licensed premises gaming machine permits may wish to consider the provision of information leaflets/helpline number for organisations such as GamCare</li> <li>• TMBC expects the following matters to be considered by operators when making their risk assessment: information held by the licensee regarding self-exclusions and incidences of underage gambling; gaming trends that may mirror days for financial payments such as pay days or benefit payments; arrangement for localised exchange of information regarding self-exclusions and gaming trends; proximity of premises which may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor's surgeries, council housing offices,</li> </ul>
--	--	--	--	---



## APPENDIX 3

### Tameside & Glossop Strategic Commission Equality Impact Assessment (EIA) Form

				<p>addiction clinics or help centres, places where alcohol or drug dependent people may congregate, etc.</p> <p>As these aspects of the policy are designed to prevent vulnerable people from gambling, they will have a direct impact on vulnerable people</p>

*Wherever a direct or indirect impact has been identified you should consider undertaking a full EIA or be able to adequately explain your reasoning for not doing so. Where little / no impact is anticipated, this can be explored in more detail when undertaking a full EIA.*

1d.	Does the project, proposal or service / contract change require a full EIA?	Yes	No
			✓

**Tameside & Glossop Strategic Commission  
 Equality Impact Assessment (EIA) Form**

<b>1e.</b>		<p>Although the Policy will directly impact young people and vulnerable people, and also indirectly impact religious groups all of these have been assessed as a positive impact as detailed in Table 1C.</p> <p>The aspects of the policy that aim to prevent young people and vulnerable people from being harmed by gambling are to their benefit. Similarly the aspects that relate to religious groups allow these groups more scope to be considered in operator's risk assessments and for the religious groups to challenge applications as "interested parties".</p> <p>Furthermore the Gambling policy is being renewed because it is a legal requirement for local authorities to revise these policies every 3 years (Gambling Act)</p> <p>The primary legislation for this policy is the Gambling Act 2005 this has been subject to comprehensive equality impact assessments and there is limited scope within the statements of licensing policy to add additional local requirements.</p> <p>With reference to the Gambling Act policy, the policy affects existing licensed premises and gambling premises and anyone who wishes to apply for a new licence. As such, the policies are designed to provide opportunities for all applicants and licence holders so that no group of people (protected or otherwise) will be adversely affected by the contents of the policies.</p> <p>The policy is designed to encourage licence holders and applicants to promote clear and unambiguous licensing objectives which are intended to protect all members of the public from the potential adverse effects of licensed premises or gambling premises.</p> <p>Additionally the draft policy has all been subject to a full 12 week public consultation and all responses to the consultation have been considered and included in the final decision report. The consultation was widely promoted including via the local voluntary, community and faith sector to encourage responses from different protected characteristic groups.</p>
<b>What are your reasons for the decision made at 1d?</b>		

**APPENDIX 3****Tameside & Glossop Strategic Commission  
Equality Impact Assessment (EIA) Form**

<b>Signature of Contract / Commissioning Manager</b>	<b>Date</b>
<b>S Smith</b>	<b>19. 3.2019</b>
<b>Signature of Assistant Director / Director</b>	<b>Date</b>
<b>E Varnam</b>	<b>19.3.2019</b>