

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

Gambling Act Statement of Principles 2016 - 2019

SECTION 1 - INTRODUCTION

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.

- The objective of the Gambling Policy is to inform interested parties of the principles that it proposes to apply when exercising its functions under the Gambling Act 2005. The 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 disorder 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

Direct recipients of the policy are:

- Operators/Managers of all premises with AWP Machines (i.e. Public Houses and Clubs)
- Operators/Managers of all licensed Betting Offices
- Operators/Managers of all licensed bingo halls
- Operators/Managers of all registered Society Lotteries
- Members of Licensing Sub Committee

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

Performance is measured through:

- Applications are dealt with during the statutory procedures and time frames.
- Complaints are followed up to ensure compliance.
- Proactive compliance visits are made to licensed premises to ensure compliance.

SECTION 2 –RESEARCH AND CONSULTATION

This section is intended to raise information which links to and which has potential impacts in relation to equality, in particular the protected characteristic groups as set out in the Equality Act 2010. Section 3 of this EqIAA will discuss the issues emerging with the intention of highlighting those issues with the potential to be addressed via the Gambling Act Statement of Principles 2016 – 2019.

Research into equalities issues surrounding gambling have highlighted the following potential implications:

BigDeal (part of GamCare, the organisation that runs the National Problem Gambling HelpLine and NetLine) research states:

- Around 80% of young people will have gambled at some point in their lives, and almost a quarter gamble every week.
- Anyone can develop a gambling problem. Two of the things that seem to put young people at risk of developing a problem are a history of gambling in their family and the age they started gambling themselves. The earlier people start, the more likely they are to experience gambling-related problems later on.
- Being addicted to gambling can seriously damage your physical and mental health because you're getting little exercise and your mind is focused on a stressful or intense situation. You might also eat more whilst gambling to pass the time. A gambling problem can result in the loss of social relationships, poor outcomes at school, and in severe cases committing crimes in order to fuel the addiction.
- Anyone who gambles may be at risk of developing a gambling problem, including young people. 2% of young people in the UK (that's 60,000 young people) are likely to be struggling with a gambling problem this very moment.

Research in the USA (National Centre for Responsible Gaming - NCRG) has found:

- Black respondents exhibited higher rates of problem gambling than white respondents
- Higher proportions of black problem gamblers, as compared with white ones, were women (49 percent vs. 32 percent)

The Problem Gambling Institute of Ontario says:

- One of the most noted gender differences with regard to gambling is around motivation. Many have identified that men tend to gamble for the excitement, the sake of feeling a rush and for the action (Ladd & Petry, 2002; Walker, G. J. et al. 2005), while women gamble mostly to escape and cope with stressful or unsatisfying lives (Ladd & Petry, 2002; Boughton & Brewster, 2002).
- The progression of a gambling problem is much faster in women than it is in men (Tavares et al., 2001). In addition, women tend to start gambling significantly later in life, compared to men. In their study, Tavares et al., (2001) found that the average onset of gambling was 34.2 for women compared to 20.4 for men.

- Much of the research suggests that women are underrepresented in treatment. Women constitute only 2-7% of Gamblers Anonymous membership (Mark & Lesieur, 1992; Lesieur & Blume, 1991)
- Abbott (2002) found that women are less likely to commit gambling related crimes but are more likely to be convicted of criminal offences.
- Ladd & Petry (2002) identified that females experiencing problems with gambling were substantially more likely than males “to be living with someone with a current gambling problem or alcohol problem.” Consequently, the home context for these women “may be more unstable, stressful, or unsupportive than that of their male counterparts. Female participants also had more friends who gambled than did male participants, suggesting that their gambling behaviours may be more strongly tied to their social network, making it more difficult for them to remove themselves from gambling situations or pressures.” (Ladd & Petry, 2002)

The Gambling Commission’s Single Equality Scheme

(<http://www.gamblingcommission.gov.uk/pdf/single%20equalities%20scheme%20-%20may%202010.pdf>) has been reviewed as part of this assessment and a key point emerging from this is: Page 7 – “*Our Licence Conditions and Codes of Practice (LCCP) require that if gambling operators advertise in another language, then any associated social responsibility publications should also be produced in that language. This is the responsibility of the operators*”.

Consultation

Public consultation was conducted in relation to the Gambling Act Statement of Principles 2016 – 2019 between 22nd July 2015 and the 16th October 2015. In respect of equalities implications, the consultation received the following point which links to equalities:

*“With regard to this review I would be interested to your definition of ‘Other vulnerable persons’ as mentioned under the headings **Overview of the Statement of Principles Licensing objectives**. I personally consider people with gambling addictions as vulnerable and they would therefore potentially be ‘harmed or exploited by gambling’. I would be interested in your thoughts.”*

Specific Research Conducted within the Consultation period

In addition to public consultation, specific research was conducted with all gambling premises in South Gloucestershire in order to highlight any local issues pertaining to equalities. Key research findings are:-

Premises were presented with a range of statements elicited from the national and international research findings shown above. Premises were asked to indicate their level of agreement with the findings within the local context of their premises.

Key findings are:

Table 1 – Table to show levels of agreement reported by South Gloucestershire premises in relation to international and national research findings.

	Strongly Agree / Agree	Disagree / Strongly Disagree
Around 80% of young people will have gambled at some point in their lives, and almost a quarter gamble every week.	64%	36%
Black respondents exhibited higher rates of problem gambling than white respondents.	25%	75%
The progression of a gambling problem is much faster in women than it is in men.	30%	70%
Women tend to start gambling significantly later in life, compared to men	48%	52%
Being addicted to gambling can seriously damage your physical and mental health because you're getting little exercise and your mind is focused on a stressful or intense situation. You might also eat more whilst gambling to pass the time.	68%	32%
A gambling problem can result in the loss of social relationships, poor outcomes at school, and in severe cases committing crimes in order to fuel the addiction.	68%	32%

Premises were also asked to identify the customers spending most time in their licensed premise. This question showed the following results:

Table 2 – Table to show licensed premises reporting of customer characteristics of those spending most time in the licensed premises

No. of Premises	Customer characteristics
1	White British Males aged 65+ during morning periods and, White British males aged 31 - 65 during evening periods
2	White British Males aged 65+
3	Males aged 46 - 65 from BAME backgrounds
4	White British Males aged 18 - 30
5	White British Males aged 46 - 65
6	White British Males aged 46 - 65
7	White British Males aged 65+
8	White British Males aged 46 - 65
9	White British Males aged 45+
10	White British Males aged 18 - 30
11	White British Females aged 65+
12	White British Males aged 46 - 65
13	White British Males aged 65+
14	White British Males aged 65+
15	White British Males aged 46 - 65
16	White British Males aged 65+
17	White British Males aged 31 - 45
18	White British Males aged 46 - 65
19	White British Males aged 46 - 65
20	White British Males aged 46 - 65

21	White British Males aged 46 - 65
22	Males aged 31 - 45 - wide diversity of ethnicities
23	White British Males - wide diversity of ages
24	White British Males aged 31 - 45
25	White British Males

The information shows:

Ethnicity

- 23 premises cited White British Males as spending the most time in their licensed premise.
- 1 premise cited people from BAME backgrounds as spending the most time in their licensed premise.
- 1 premise cited that a wide diversity of ethnic backgrounds spend time in their licensed premise as opposed to one ethnicity more than another.

Age

- 11 premises cited 46 – 65 year olds as spending the most time in their licensed premise.
- 7 premises cited 65+ year olds as spending the most time in their licensed premise.
- 3 premises cited 31 – 45 year olds as spending the most time in their licensed premise.
- 1 premise cited 31 – 65 year olds as spending the most time in their licensed premise.
- 2 premises cited 18 – 30 year old Males as spending the most time in their licensed premise.

Gender

- 24 premises cited Males as spending the most time in their licensed premise.
- 1 premise cited Females aged 65+ as spending the most time in their licensed premise (although not by a large margin when compared to Male customers).

Disability

- None of the premises cited Disabled People as being most likely to spend time in their licensed premise, although the majority were able to cite a range of customer impairments of those frequenting their premises from learning disability to physical impairment such as wheelchair users.

SECTION 3 - IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

Section 2 (above) has raised a number of equalities issues which have some links to gambling activity. This section highlights those issues pertaining to the Gambling Act Statement of Principles and provides discussion of how the Policy may ensure the proactive delivery of sound equalities practices.

The protected characteristics of Sex, Race, Disability and Age have been identified via the research information shown in Section 2. It is worth noting that the following protected characteristic groups in particular have been highlighted:

- Males aged 46+ of White British backgrounds.

It is important to note however, that

- Males aged 18 – 30 years
- Males from BAME backgrounds
- Females aged 65+
- People with disabilities

also feature within the research results.

In respect of the requirements of the Gambling Act 2005, the Authority conducts underage sales operations to check safeguarding practices, and the most recent undertaken showed 100% of gambling premises passed these checks.

Gambling legislation and licensing procedures are designed to ensure that any problem gambling is identified and all licensed premises must promote help and provide written advice on contacting Gam Care. In this respect, the specific research conducted with all gambling establishments in South Gloucestershire pertaining to equalities noted establishments proactively advertising responsible gambling information.

Examples of actions which may be taken at any stage when issues pertaining to equalities are highlighted by the Policy include:-

- Conditions being considered where they are needed
- Delivery of the Authority's enforcement role
- Paying particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.
- Actively working with the police in enforcing licensing legislation along with the establishment of protocols with the Avon and Somerset Constabulary, the Avon Fire and Rescue Service, and other Council bodies such as Environmental Health, Trading Standards and Safeguarding Children Board Child Protection on enforcement issues to ensure an efficient deployment of officers
- Part of the policy and licensing requirements are that proof of age schemes are in place. These are checked by the authority thereby providing a layer of protection.

Partnership working with others as set out within Appendix A of the Policy is established and will continue. This provides the systems necessary to identify problem gambling and any associated health and well-being issues emerging in respect of diverse groups and in particular those noted above.

SECTION 4 - EqIAA OUTCOME

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input checked="" type="checkbox"/>	The Gambling Act Statement of Principles 2016 – 2019 is in-line with the requirements of legislation. Consultation has not highlighted any negative equalities impacts. Monitoring activity and associated actions are in place to respond to any equalities issues emerging in respect of the licensing objectives as set out in section 1 of the Act Gambling Act 2005.
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input type="checkbox"/>	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

SECTION 5 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

Continue the Policy implementation actions as stated in Section 3 of this EqIAA in order to proactively respond to any equalities issues arising.

Clearly link with wider Licensing Policy actions in order to work with partners to identify any issues pertaining to problem gambling for any equalities groups and implement appropriate actions as a result.

Conduct a review on the requirement for specific equalities training for those involved in activities pertaining to licensing, including partners.

SECTION 6 - EVIDENCE INFORMING THIS EqIAA

- The Gambling Commission's Single Equality Scheme
- BigDeal (part of GamCare, the organisation that runs the National Problem Gambling HelpLine and NetLine) research
- Research in the USA (National Centre for Responsible Gaming – NCRG)
- The Problem Gambling Institute of Ontario research