

Equality & Health Impact Assessment (EqHIA)

Document control

Title of activity:	Adoption of the Statement of Gambling Policy 2020-2023
Lead officer:	Keith Bush, Public Protection Manager (Licensing and Trading Standards) 01708 433425 Keith.bush@havering.gov.uk
Approved by:	Dipti Patel, Assistant Director, Environment
Date completed:	3/12/19
Scheduled date for review:	The Statement of Gambling Policy needs to be reviewed every three years. It will next be reviewed in July 2023.

Please note that the Corporate Policy & Diversity and Public Health teams require at least **5 working days** to provide advice on EqHIAs.

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Did you seek advice from the Public Health team?	Yes
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

Please note that EqHIAs are **public** documents and must be made available on the Council's [EqHIA webpage](#).

Please submit the completed form via e-mail to EqHIA@havering.gov.uk thank you.

1. Equality & Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EqHIA and ensure you keep this section for your audit trail. If you have any questions, please contact EqHIA@havering.gov.uk for advice from either the Corporate Diversity or Public Health teams. Please refer to the Guidance in Appendix 1 on how to complete this form.

About your activity

1	Title of activity	Adoption of the Statement of Gambling Policy 2020-23		
2	Type of activity	Adoption of a Statement of Gambling Policy		
3	Scope of activity	<p>It is a legal requirement under s349 of the Gambling Act 2005 for each licensing authority to prepare a statement of principles that they propose to apply when exercising their licensing function. The Authority is required to review the policy at least every 3 years.</p> <p>The London Borough Of Havering's current Statement of Gambling Policy 2016-2019 was agreed by Full Council on 25th November 2015 and a revised policy therefore needs to be considered. The Statement of Gambling Policy is the primary document for setting out the Council's local approach to gambling regulation. Officers have reviewed the existing Policy and concluded that it would be appropriate to make revisions.</p> <p>Before the licensing authority publishes, its statement of licensing principles it must carry out a public consultation. This consultation was undertaken for eight weeks between 30th September 2019 and 25th November 2019.</p> <p>The Statement of Gambling Policy needs to be agreed by Cabinet before going to Full Council for final approval.</p>		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>any</u> of these questions is 'YES', please continue to question 5.	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6.
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes		
4c	Does the activity have the potential to impact (either positively or negatively) upon	Yes		

	any factors which determine people's health and wellbeing?			
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.		
6	If you answered NO:	N/A		

Completed by:	Keith Bush, Public Protection Manager (Licensing and Trading Standards) Environment Directorate 01708 433425 Keith.bush@haverling.gov.uk
Date:	3/12/19

2. The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:
<p>The Gambling Act 2005 (the "Act") requires this Licensing Authority to consult on and publish a Statement of Gambling Policy in relation to its responsibilities under the Act. Once published, this Policy Statement will be kept under constant review and, reviewed every three years. Before any revision of the Statement of Gambling Policy is published, this Authority will carry out a full consultation exercise on the relevant sections. The Statement of Gambling Policy has been revised after review and is for the period 2020 – 2023.</p> <p>The Gambling Commission states in the introduction to its Guidance to Licensing Authorities:</p> <p><i>'The aim of this Guidance is to ensure that every licensing authority has the information it needs to make effective decisions. It does not seek to impose a 'one size fits all' model across all licensing authorities. We recognise that every licensing authority is different and will have different views about how it wishes to manage gambling locally. Indeed, the Act establishes a high degree of local accountability for gambling regulation.</i></p> <p><i>This Guidance does not, therefore, attempt to fetter the discretion that licensing authorities have under the Act and it is not intended to replace their judgement in individual cases. Moreover, this Guidance cannot anticipate every set of circumstances that may arise and, as long as it has been understood and taken into</i></p>

account, licensing authorities may depart from it where they consider it would be right to do so. There should, however, be strong reasons for departing from this Guidance and these need to be clearly expressed and explained if a licensing authority is to avoid judicial review or challenge on appeal for failing to take this Guidance into account.'

This Policy, therefore, generally follows the principles laid down in the Gambling Commission's Guidance to Licensing Authorities.

Licensing objectives

The Act also requires this Authority to carry out its various licensing functions so as to be reasonably consistent with the following three licensing objectives:

- preventing gambling from being a source of crime and 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

As required by the Guidance issued by the Gambling Commission, the Council, in carrying out its licensing functions under the Act will aim to permit the use of premises for gambling as long as it is considered to be:-

- in accordance with any relevant code of practice issued by the Gambling Commission,
- in accordance with any relevant guidance issued by the Commission
- reasonably consistent with the licensing objectives, and
- in accordance with this Policy Statement published under section 349 of the Act

Nothing in this Statement of Gambling Policy will override the right of any person to make an application under this Act and have that application considered on its individual merits. Equally, nothing in this Statement of Gambling Policy will undermine the right of any person to make representations to an application, or seek a review of a licence where there is a legal power to do so. This Authority will ensure that, when considering applications under this legislation, it will avoid duplication with other regulatory regimes.

The London Borough of Havering has undertaken an eight week consultation. The feedback and comments have been considered and further amendments have been made where appropriate.

It can be argued that the policy itself can have positive impacts in terms of business and income generation, and for some people is fun and sociable contributing to their overall wellbeing.

However, in recognition that some groups are disproportionately affected by gambling as an activity per se, and thus has potentially negative impacts, the policy wording seeks to minimise these negative impacts. The overall impact is intended to be neutral.

Section 8 of the Gambling Policy explicitly seeks to Protect Children and other Vulnerable Persons from being harmed or exploited by Gambling, including such measures as:

- Proof of age schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Specific opening hours
- Self-barring schemes
- Notices/signage
- Measures/training for staff on how to deal with suspected truanting school children on the premises and how to recognise signs of potential child sexual exploitation
- clear policies that outline the steps to be taken to protect children from harm;
- Provision of information leaflets/helpline numbers for organisations such as GamCare and GambleAware.

Following the consultation all responses have been considered and where appropriate additional amendments adopted. Further controls include:

- Requiring that pubs with gaming machines adhere to the Code of Practice for Gaming Machines in Clubs and Premises with an Alcohol Licence.
- Clarify that training for staff is not only in relation to the protection of children but also other vulnerable people.
- The Licensing Authority would also encourage operators to consider participation in voluntary best practice or certification schemes to assist in their promotion of the objective of protecting children and other vulnerable persons from being harmed or exploited by gambling.

Who will be affected by the activity?

Those that use gambling premises and machines. Those that live near to and pass by gambling premises. Individuals employed within the gambling industry. It is recognised that if gaming and betting premises are well run that they provide can build community cohesion and cultural development.

The policy also recognises that negative impacts can also occur if good management practices are not followed. The revised policy addresses the need to protect children and other vulnerable persons from being harmed or exploited by gambling.

Potential negative impacts may arise in the form of noise, nuisance, disturbance and crime and disorder problems. With gaming and betting establishments, there are also risks of individual gambling addiction.

Protected Characteristic - Age:

Please tick (✓) the relevant box:

Positive

Neutral

✓

Negative

Overall impact: Neutral

Those under 18 are at higher risk from gambling as an activity and those aged 25-34 are also most likely to be problem gamblers.

The proposed statement of gambling policy is intended to address this negative issue by promoting responsible retailing and ensuring that those that apply for a license consider the impact of their business on this group.

The policy requires them to conduct a Local Risk Assessment and act appropriately to protect children from harm. This would include considering the location of their premises in relation to premises used by children and using age verification tools such as Challenge 25 to prevent underage gambling.

It also aims to protect vulnerable persons including considering the location of the premises in relation to premises frequented by vulnerable persons and the provision of information regarding self-exclusion and leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Evidence:

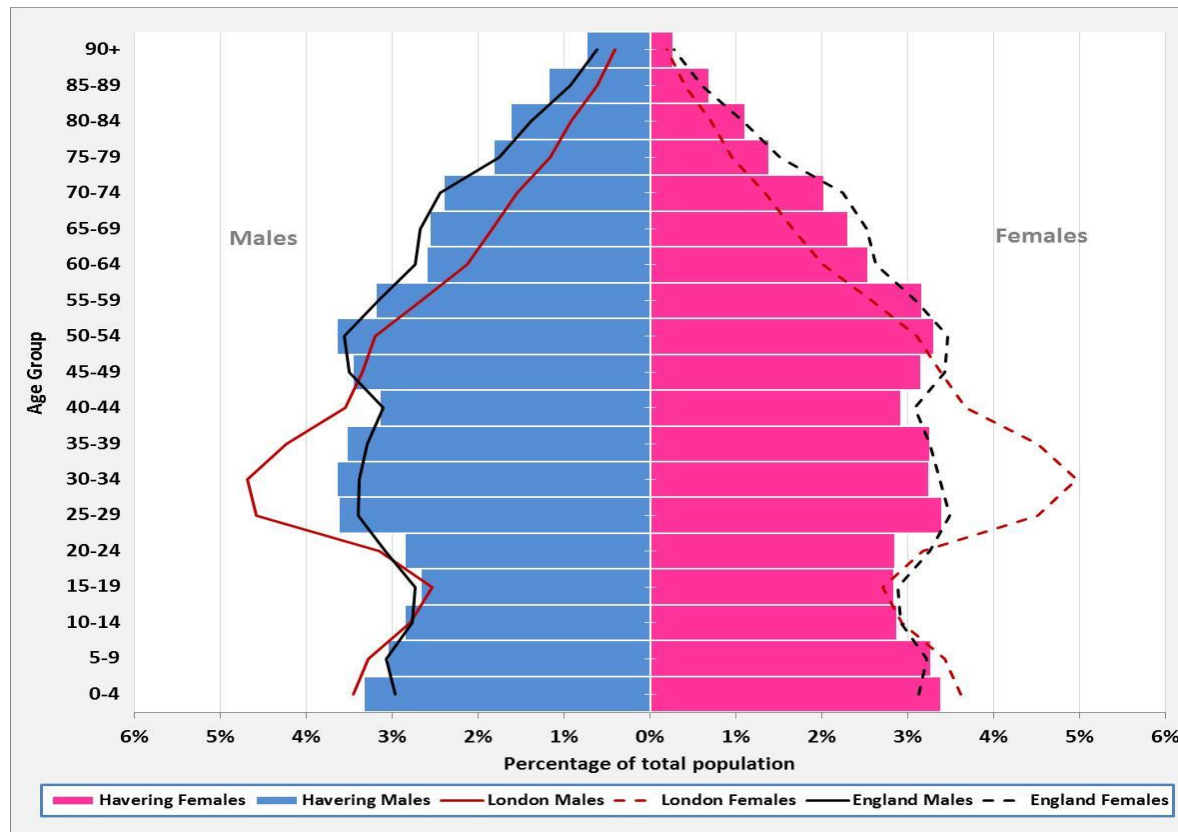
The estimated population of the London Borough of Havering is 256,039.

- It has the oldest population in London with a median age of approximately 40 years old, as recorded in the 2011 census.
- The Borough experienced a net population loss of 6.3% from 1983 to 2002 but the population has increased year on year from 2002, with a 13.7% increase from 2002 to 2017.
- As well as increases in the number of births in Havering, there has been an increase in the general fertility rate from 58 (per 1,000 women aged 15-44) in 2004 to 68 in 2017. This equates to an additional 10 births per 1,000 women aged 15-44 within the period.
- From 2011 to 2016, Havering experienced the largest net inflow of children across all London boroughs. 4,580 children settled in the borough from another part of the United Kingdom during this six-year period.
- It is projected that the largest increases in population will occur in children (0-17 years) rising from 58,500 in 2018 to 72,100 in 2033 and older people age groups (65 years and above) from 46,900 in 2018 to 61,400 in 2033.
- The life expectancy at birth for people living in Havering is 80.1 years for males and 84.2 years for females.
- The life expectancy at age 65 years in Havering is 18.9 years for males and 21.6 years for females.

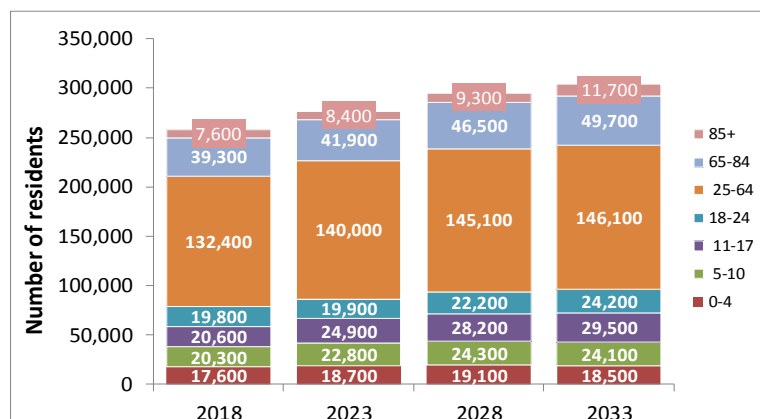
The table below shows the breakdown of current (mid-2017) population by gender and five-year age bands.

AGE BAND (YEARS)	MALE	FEMALE	PERSONS
00-04	8,671	8,553	17,224
05-09	8,371	7,820	16,191
10-14	7,359	7,306	14,665
15-19	7,277	6,833	14,110
20-24	7,316	7,308	14,624
25-29	8,688	9,295	17,983
30-34	8,325	9,355	17,680
35-39	8,344	9,038	17,382
40-44	7,491	8,078	15,569
45-49	8,064	8,879	16,943
50-54	8,463	9,333	17,796
55-59	8,103	8,183	16,286
60-64	6,504	6,664	13,168
65-69	5,903	6,577	12,480
70-74	5,191	6,158	11,349
75-79	3,539	4,672	8,211
80-84	2,836	4,157	6,993
85-89	1,756	3,032	4,788
90+	706	1,891	2,597
All Ages	122,907	133,132	256,039

The population pyramid compares the population figures for Havering with London and England by five-year age bands. The pyramid shows a much older age structure for the population of Havering compared to London but similar to England.



Projected Population Increases by Age group



Age Group	Percentage change from 2018 to		
	2023	2028	2033
0-4	6%	9%	5%
5-10	12%	20%	19%
11-17	21%	37%	43%
18-24	1%	12%	22%
25-64	6%	10%	10%
65-84	7%	18%	26%
85+	11%	22%	54%

The Gambling Commission published a document in February 2018 called ‘Gambling Participation in 2017: behaviour, awareness and attitudes.’ It found that those participating in gambling are more likely to be aged between 25 to 34 and 45 to 64.

Gambling and Young People

Whilst gambling is aimed at those over 18, it is recognised that those under 18 may be attracted to it. The Gambling Commission published a research paper entitled ‘Young People and Gambling 2018’ in November 2018. They found that:

Compared to other potentially harmful activities, the rate of gambling in the past week among young people (14%) is higher than the rates of drinking alcohol (13%), smoking cigarettes (4%) and taking illegal drugs (2%).

Problem gambling

The survey indicates that 1.7% of 11-16 year olds are problem gamblers, 2.2% are ‘at risk’ gamblers and 32.5% are non-problem gamblers. These percentages are based on the youth-adapted problem gambling screen DSM-IV-MR-J6.

These figures represent an increase compared to the rates of problem and at risk gambling seen in the 2017 survey (0.9% and 1.3% respectively). The differences can largely be attributed to a larger number of respondents qualifying for the screening questions than in

previous years, due to the addition of a question, which enabled us to identify past 12-month gamblers more accurately than before.

The Gambling Commission published a document in February 2018 called 'Gambling Participation in 2017: Behaviour, Awareness and Attitudes.' It found that those aged 25 to 34 are most likely to be classified as problem gamblers (2.0%), followed by 16-24 year olds (1.6%).

The Draft Statement of Gambling Policy has the following components which are intended to mitigate for harmful impacts including:

Applicants to use of Local Risk Assessments in relation to young persons:

- As per the Gambling Commission's Guidance for Licensing Authorities, the Licensing Authority expects operators of gambling premises to have in place policies and measures to ensure children and other vulnerable people are protected from being harmed or exploited by gambling. Harm in this context is not limited to harm from gambling but includes wider child protection considerations, including the risk of child sexual exploitation.
- The Authority will expect applicants for the new grant of, or variation to an existing, licence to also submit their LRA to comply with Social Responsibility (SR) code 10.1.1 and Ordinary code provision 10.1.2.

The Authority will expect the local risk assessment to consider:

- The location of services for children such as schools, playgrounds, leisure/community centres and other areas where children and young people will congregate such as youth clubs, parks, bus stops, cafés, shops, entertainment venues such as cinemas, bowling allies and any other place where children are attracted.
- The demographics of the area in relation to vulnerable groups and how vulnerable persons from different cultures will be protected.
- Whether the premises is in an area subject to high levels of crime and/or disorder, including areas that are prone to youths participating in antisocial behaviour, e.g. graffiti/tagging or underage drinking.
- How vulnerable people, including people with gambling dependencies are protected.
- Assessing staffing levels when a local college closes and the students begin to vacate the grounds.
- Age verification policies such as 'Challenge 25'.
- Line of sight from the counter to gambling machines
- Information held regarding self-exclusions and incidences of underage gambling.
- Whether specific measures are required at particular premises such as supervision of entrances/machines, segregation of areas etc.
- Extra controls where category C or above machines are on offer in premises to which children are admitted.
- Provision of information leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*
- Mid-year population estimates 2017; Office for National Statistics (ONS)
- GLA 2016 based Demographic Projections – Local Authority population projections Housing Led Model
- Gambling participation in 2017: behaviour, awareness and attitudes. February 2018, The Gambling Commission.
- Young People & Gambling 2018, A research among 11-16 year olds in Great Britain, November 2018, The Gambling Commission.

Protected Characteristic - Disability:

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

Physical Disability: Neutral

No differential impact has been identified on the grounds of this protected characteristic. The Statement of Gambling Policy proposal applies equally to all traders operating in Havering irrespective of physical disability.

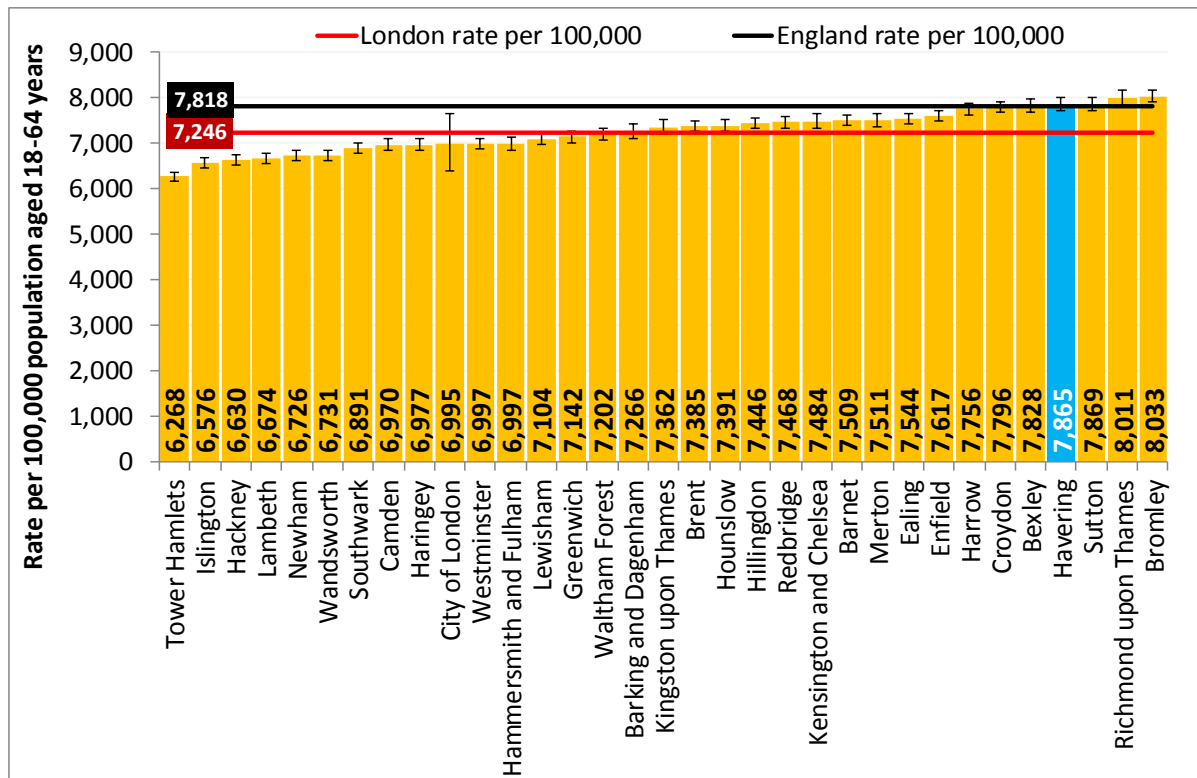
Mental Disability and those with learning difficulties: Negative

Those with mental health illness are at higher risk from gambling as an activity. However, the proposed Statement of Gambling Policy is intended to address this negative issue by promoting responsible retailing and ensuring that those that apply for a license consider the impact of their business on this group.

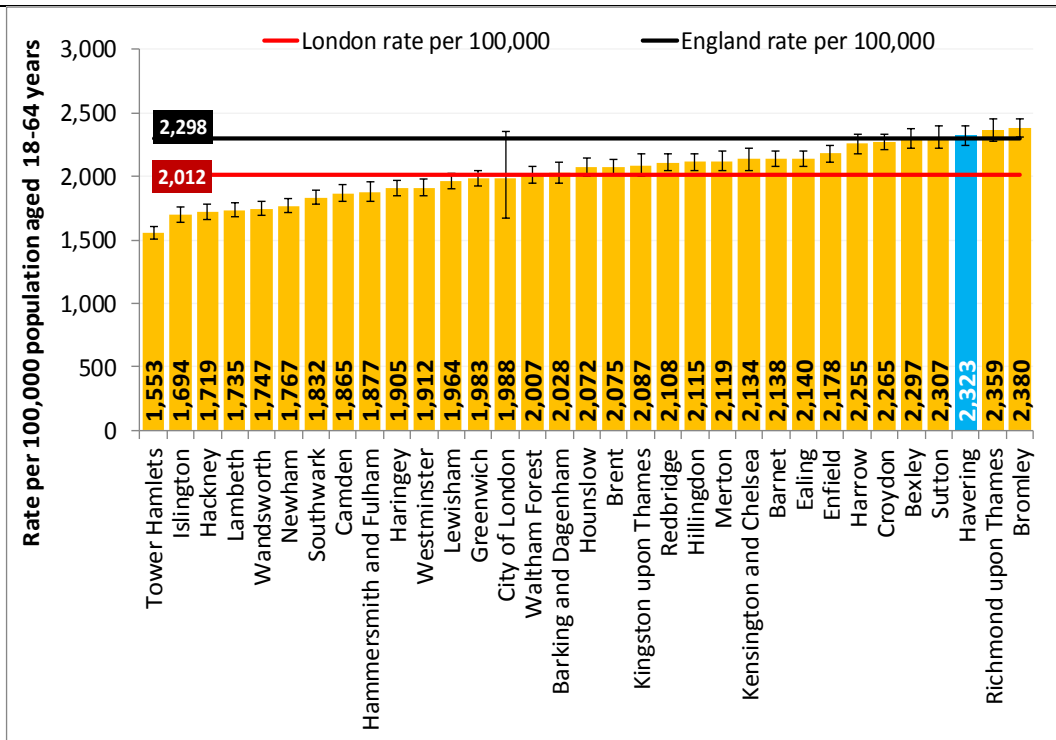
The policy requires them to conduct a Local Risk Assessment and respond appropriately to protect vulnerable persons including considering the location of the premises. This is in relation to premises frequented by vulnerable persons and the provision of information regarding self-exclusion and leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Evidence:

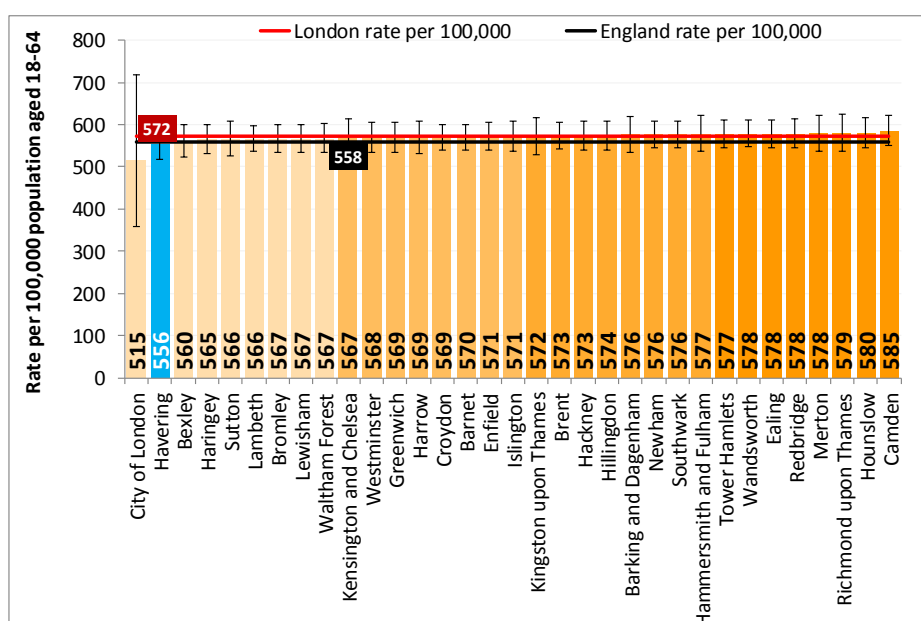
- According to the latest ONS Annual Population Survey (Jan 2015-Dec 2015), 19% of working age people living in Havering have disclosed that they have a disability or long term illness. This is a similar proportion to England (20%).
- The estimated number of people in Havering aged 18-64 living with moderate physical disabilities was 11,870 in 2017 – a rate of 7,865 per 100,000 population aged 18-64 years. This rate is one of the highest among London local authorities. It is statistically similar to England but significantly higher than the London average.



- In 2017, 3,506 adults (aged 18-64 years) were estimated to be living with serious physical disabilities in Havering. The estimated rate of serious physical disabilities in Havering (2,323 per 100,000-population aged 18-64 years) is similar to England but significantly higher than London average and one of the highest rates of London local authorities. The rationale for this is likely due to the relatively older population in Havering compared to other London boroughs.



- About 817 adults (aged 18-64 years) are estimated to be living with moderate or severe learning disabilities in Havering in 2015 and hence likely to be in receipt of health and social care services.
- The 2017 estimated rate of moderate or severe learning disabilities in Havering (556 per 100,000 persons aged 18-64 years) is similar to England. Havering is estimated to have the second lowest rate of moderate or severe learning disabilities among London local authorities.



- At least one in four people will experience a mental health problem at some point in their life and one in six adults have a mental health problem at any one time.
- One in ten children between 5 and 16 years has a mental health problem, and many continue to have mental health problems in adulthood.
- Half of those with lifetime mental health problems first experience symptoms by the age of 14, and three quarters before their mid-twenties.
- Self-harming in young people is not uncommon (10-13% of 15-16 year olds have self-harmed).
- Almost half of all adults will experience at least one episode of depression during their lifetime.
- One in ten new mothers experience postnatal depression.
- About one in 100 people has a severe mental health problem.
- Some 60% of adults living in hostels have a personality disorder.
- Some 90% of all prisoners are estimated to have diagnosable mental health problem (including personality disorder) and / or substance misuse problem.

Mental Health and Gambling

People gamble for a whole range of reasons. While gambling moderately is not a problem, gambling can become an addiction and can be harmful to mental health. Some people say that there is no such thing as safe gambling. Others argue that gambling is like drinking alcohol - it is safe to do as long as you follow some sensible rules. *

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, have poor sleep and appetite, to develop a substance misuse problem and to suffer from depression. **

A report titled 'Problem gambling in Birmingham. A Rapid Assessment Report' published in May 2018 states that:

'There is a strong correlation between problem gambling and mental health problems though the nature of the links between the two are complex'.

The Statement of Licensing Policy has the following components which are intended to mitigate for harmful impacts including:

- As per the Gambling Commission's Guidance for Licensing Authorities, the Licensing Authority expects operators of gambling premises to have in place policies and measures to ensure children and other vulnerable people are protected from being harmed or exploited by gambling. Harm in this context is not limited to harm from gambling but includes wider child protection considerations, including the risk of child sexual exploitation.
- Encouraging applicants to conduct local risk assessments, particularly in relation to proximity to local housing, places of worship and/or other premises visited by children or vulnerable people.

- The Authority will expect the local risk assessment to consider:
 - The location of services for children such as schools, playgrounds, leisure/community centres and other areas where children and young people will congregate such as youth clubs, parks, bus stops, cafés, shops, entertainment venues such as cinemas, bowling allies and any other place where children are attracted.
 - The demographics of the area in relation to vulnerable groups and how vulnerable persons from different cultures will be protected.
 - Whether the premises is in an area subject to high levels of crime and/or disorder, including areas that are prone to youths participating in antisocial behaviour, e.g. graffiti/tagging or underage drinking.
 - How vulnerable people, including people with gambling dependencies are protected.
 - Assessing staffing levels when a local college closes and the students begin to vacate the grounds.
 - Age verification policies such as 'Challenge 25'.
 - Line of sight from the counter to gambling machines.
 - Information held regarding self-exclusions and incidences of underage gambling.
 - Gaming trends that may mirror days for financial payments such as pay days or benefit payments.
 - Proximity of premises which may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate.
 - Provision of information leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Sensory Impairment

Sight

- The estimated number of people living with sight **loss** in **England** is 1.7 million.
- Only 17 per cent of people experiencing sight loss are offered emotional support in response to their deteriorating vision.
- Only 27 per cent of blind and partially sighted people of working age are in employment – a fall from 33 per cent in employment in 2006.
- 39 per cent of blind and partially sighted people of working age say they have some or great difficulty in making ends meet.
- 35 per cent of blind and partially sighted people say that they sometimes, frequently or always experience negative attitudes from the public in relation to their sight loss.
- 31 per cent of people are rarely or never optimistic about the future.

Hearing

- There are 11 million people with hearing loss across the UK, that's around one in

six of us.

- By 2035, we estimate there will be around 15.6 million people with hearing loss across the UK - that is one in five.
- There are 50,000 children with hearing loss in the UK. Around half are born with hearing loss while the other half lose their hearing during childhood.
- An estimated 900,000 people in the UK have severe or profound hearing loss.
- We estimate that there are at least 24,000 people across the UK who use British Sign Language (BSL) as their main language (although there are likely to be more that we do not know about).
- More than 40% of people over 50 years old have hearing loss, rising to 71% of people over the age of 70.
- Around one in 10 UK adults has tinnitus.

Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*
- Projecting Adult Needs and Service Information System (PANSI, 2017); calculations uses Mid-year population estimates 2017; Office for National Statistics (ONS); *produced by public health intelligence*
- Mental Health JSNA January 2015
- Royal National Institute for the Blind
- Action on Hearing Loss
- Mental Health Foundation https://www.mentalhealth.org.uk/a-to-z/g/gambling-and-mental-health*
- GamCare https://www.gamcare.org.uk/get-advice/how-can-gambling-affect-your-life/mental-health**
- Problem gambling in Birmingham. A Rapid Assessment Report May 2018

Protected Characteristic - Sex/gender:

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

Evidence would suggest that there is a slightly higher proportion of men than women that gamble and that men are more likely to be classed as problem gamblers.

The proposed statement of gambling policy is intended to address this negative issue by promoting responsible retailing and ensuring that those that apply for a license consider the impact of their business on this group.

The policy requires them to conduct a Local Risk Assessment and act appropriately to protect vulnerable persons including considering the location of the premises in relation to premises frequented by vulnerable persons and the provision of information regarding self-exclusion and leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Evidence:

MALE		FEMALE		TOTAL
122,907	48.0%	133,132	52.0%	256,039

The table below shows the breakdown of current (mid-2017) population by gender and five-year age bands.

AGE BAND (YEARS)	MALE	FEMALE	PERSONS
00-04	8,671	8,553	17,224
05-09	8,371	7,820	16,191
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45-49	8,064	8,879	16,943
50-54	8,463	9,333	17,796
55-59	8,103	8,183	16,286
60-64	6,504	6,664	13,168
65-69	5,903	6,577	12,480
70-74	5,191	6,158	11,349
75-79	3,539	4,672	8,211
80-84	2,836	4,157	6,993
85-89	1,756	3,032	4,788
90+	706	1,891	2,597
All Ages	122,907	133,132	256,039

The Gambling Commission published a document in February 2018 called 'Gambling

participation in 2017: behaviour, awareness and attitudes.’ It found a slightly higher percentage of men than women gamble with 48% of men had gambled compared with 41% of women.

Problem Gambling

According to the Commissions official Health Survey rates men are more likely to be classified as problem gamblers with 1.5% of men identified as such compared to 0.2% of women.

The statement of licensing policy has the following components which are intended to mitigate for harmful impacts including:

- As per the Gambling Commission’s Guidance for Licensing Authorities, the Licensing Authority expects operators of gambling premises to have in place policies and measures to ensure children and other vulnerable people are protected from being harmed or exploited by gambling. Harm in this context is not limited to harm from gambling but includes wider child protection considerations, including the risk of child sexual exploitation.
- Encouraging applicants to conduct local risk assessments, particularly in relation to proximity to local housing, places of worship and/or other premises visited by children or vulnerable people.
- The Authority will expect the local risk assessment to consider:
 - The location of services for children such as schools, playgrounds, leisure/community centres and other areas where children and young people will congregate such as youth clubs, parks, bus stops, cafés, shops, entertainment venues such as cinemas, bowling allies and any other place where children are attracted.
 - The demographics of the area in relation to vulnerable groups and how vulnerable persons from different cultures will be protected.
 - Whether the premises is in an area subject to high levels of crime and/or disorder, including areas that are prone to youths participating in antisocial behaviour, e.g. graffiti/tagging or underage drinking.
 - How vulnerable people, including people with gambling dependencies are protected.
 - Assessing staffing levels when a local college closes and the students begin to vacate the grounds.
 - Age verification policies such as ‘Challenge 25’.
 - Line of sight from the counter to gambling machines.
 - Information held regarding self-exclusions and incidences of underage gambling.
 - Gaming trends that may mirror days for financial payments such as paydays or benefit payments.
 - Proximity of premises which may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor’s surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate.
 - Provision of information leaflets/helpline numbers for customers who may have

a gambling addiction, from organisations such as GamCare and GambleAware.

Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*
- Gambling participation in 2017: behaviour, awareness and attitudes. February 2018, The Gambling Commission.

Protected Characteristic - Ethnicity/race: Consider the impact on different ethnic groups and nationalities

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

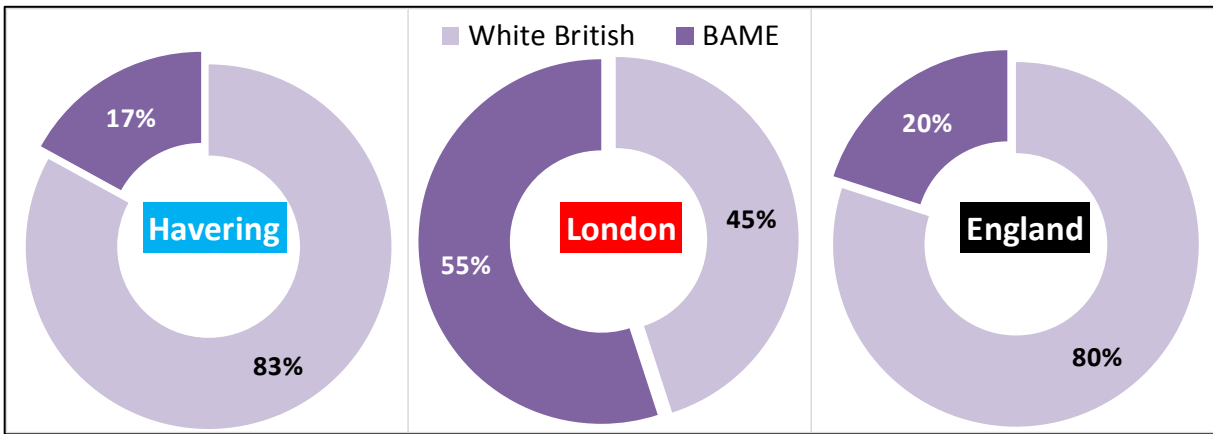
There are different cultural attitudes to gambling. Whilst it can offer cultural enrichment it is noted that Asian/Asian British and Black British backgrounds have been shown to have higher rates of problem gambling.

The proposed statement of gambling policy is intended to address this negative issue by promoting responsible retailing and ensuring that those that apply for a license consider the impact of their business on this group.

The policy requires them to conduct a Local Risk Assessment and take appropriate measures to protect vulnerable persons including considering the location of the premises in relation to premises frequented by vulnerable persons and the provision of information regarding self-exclusion and leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Evidence:

- Havering is one of the most ethnically homogenous places in London, with 83% of its residents recorded as White British in the 2011 census, higher than both London and England.
- However, the ethnically homogenous characteristic of Havering is gradually changing due to its growing cultural diversity.
- About 90% of the borough population were born in the United Kingdom.
- The Borough’s white population is projected to decrease from the current 84% to 78% in 2032.
- The BME population, notably those from Black African heritage (though many of whom are likely to be British born) is projected to increase from 4.1% in 2017 to 5.3% of the Havering population in 2032.



Ethnicity - GLA Datastore - cis ethnicity dashboard 2011 census

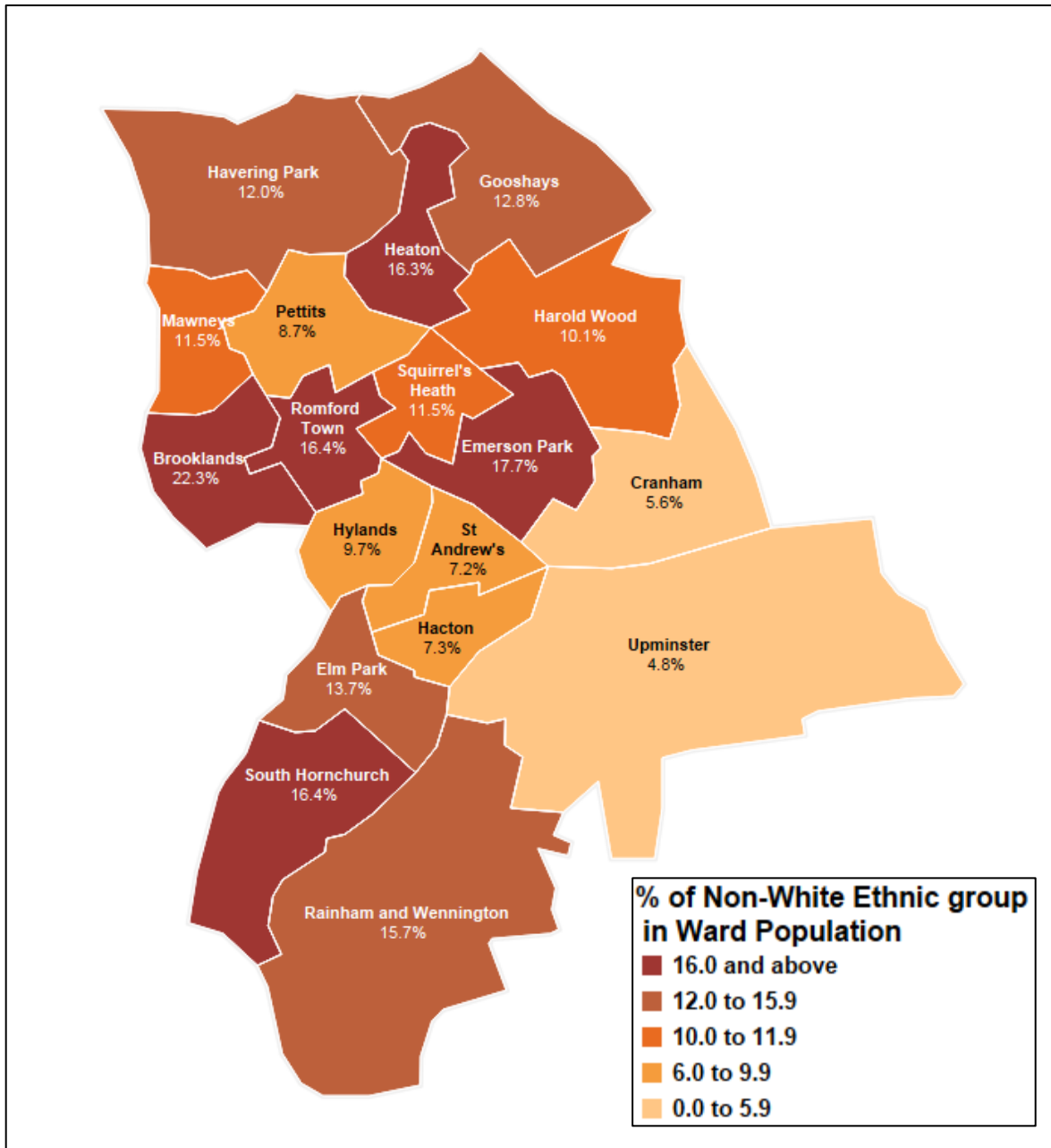
	Data	%
White British	197,615	83.3%
White Irish	2,989	1.3%
Gypsy	160	0.1%
Other White	7,185	3.0%
White and Black Caribbean	1,970	0.8%
White and Black African	712	0.3%
White and Asian	1,154	0.5%
Other Mixed	1,097	0.5%
Indian	5,017	2.1%
Pakistani	1,492	0.6%
Bangladeshi	975	0.4%
Chinese	1,459	0.6%
Other Asian	2,602	1.1%
Black African	7,581	3.2%
Black Caribbean	2,885	1.2%
Other Black	1,015	0.4%
Arab	311	0.1%
Any other ethnic group	1,013	0.4%
Totals	237,232	

Country of Birth - GLA - 2011 Census

Country of Birth	Number	%
UK Born	212,840	89.7%
Non UK Born	24,392	10.3%
Havering	237,232	100.0%

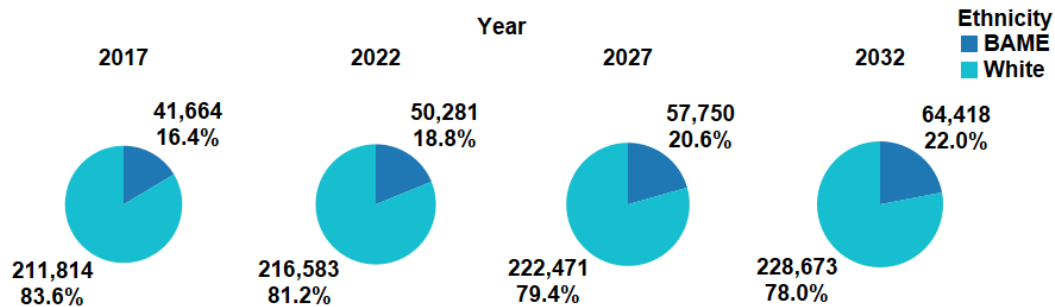
Country of Birth	Number	%
UK Born	212,840	89.7%
Ireland	2,503	1.1%
India	2,301	1.0%
Nigeria	2,241	0.9%
Lithuania	1,065	0.4%
Poland	925	0.4%
Philippines	759	0.3%
Ghana	678	0.3%
Pakistan	653	0.3%
Zimbabwe	647	0.3%
South Africa	621	0.3%
Other	11,999	5.1%
Total	237,232	100.0%

Percentage of Non-white ethnic group by ward from 2011 census

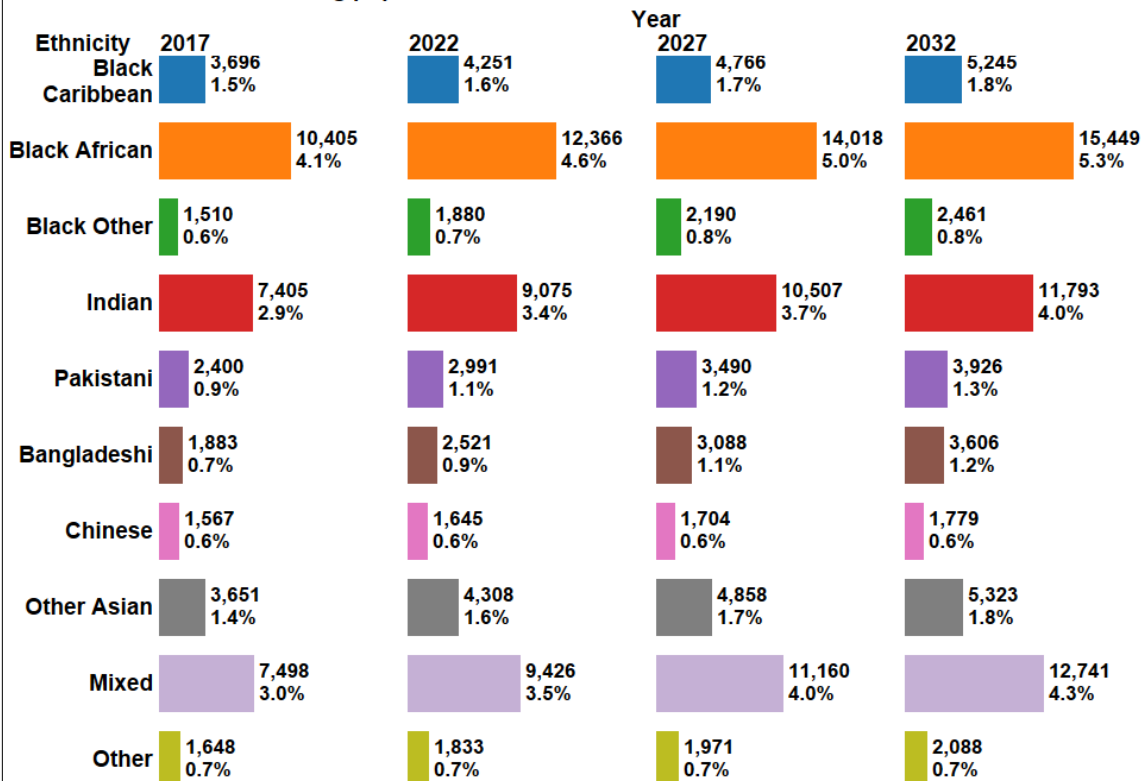


Ethnicity population projections 2017 - 2032

Proportion of Black, Asian and Minority Ethnic (BAME) and White population in Havering



Break down of Havering population classed as BAME



English as First Language (2011 Census)

- Havering number of Households 97,199.
- Number of people aged 16 and over in household that have English as main Language 91,739.
- At least one person aged 16 and over in household that have English as main Language 2,504.
- No people aged 16 and over in household but at least one person aged 3-15 that have English as main Language 684.
- No people in household have English as main Language 2,272.
- From 2011 census 10,461 people in Havering main language is not English.

A report titled 'Problem gambling in Birmingham. A Rapid Assessment Report' published in May 2018 states that:

Minority ethnic groups

- A review of national British survey data consistently shows that those from Asian/Asian British and Black British backgrounds have higher rates of problem gambling.
- Further analysis of the British Gambling Prevalence Survey (BGPS) and Health Survey England (HSE) datasets by a different research team has confirmed these associations.

The statement of licensing policy has the following components which are intended to mitigate for harmful impacts including:

- As per the Gambling Commission's Guidance for Licensing Authorities, the Licensing Authority expects operators of gambling premises to have in place policies and measures to ensure children and other vulnerable people are protected from being harmed or exploited by gambling. Harm in this context is not limited to harm from gambling but includes wider child protection considerations, including the risk of child sexual exploitation.
- Encouraging applicants to conduct local risk assessments, particularly in relation to proximity to local housing, places of worship and/or other premises visited by children or vulnerable people.
- The Authority will expect the local risk assessment to consider:
 - The location of services for children such as schools, playgrounds, leisure/community centres and other areas where children and young people will congregate such as youth clubs, parks, bus stops, cafés, shops, entertainment venues such as cinemas, bowling allies and any other place where children are attracted.
 - The demographics of the area in relation to vulnerable groups and how vulnerable persons from different cultures will be protected.
 - Whether the premises is in an area subject to high levels of crime and/or disorder, including areas that are prone to youths participating in antisocial behaviour, e.g. graffiti/tagging or underage drinking.
 - How vulnerable people, including people with gambling dependencies are protected.
 - Assessing staffing levels when a local college closes and the students begin to vacate the grounds.
 - Age verification policies such as 'Challenge 25'.
 - Line of sight from the counter to gambling machines.
 - Information held regarding self-exclusions and incidences of underage gambling.
 - Gaming trends that may mirror days for financial payments such as paydays or benefit payments.
 - Proximity of premises which may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate.
 - Provision of information leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Sources used:

- This is Havering 2018 version 4.1 (August 2018)
- 2011 Census
- Problem gambling in Birmingham. A Rapid Assessment Report May 2018

Protected Characteristic - Religion/faith

Please tick (✓)
the relevant box:

Overall impact: Neutral**Positive**

No differential impact has been identified on the grounds of this protected characteristic. The Statement of Gambling Policy proposal applies equally to all traders operating in Havering irrespective of religion/faith.

Neutral

✓

Negative**Evidence:**

(Please add in any additional evidence and use the evidence below that is relevant for your particular impact assessment, please delete unnecessary data)

Religion and Belief 2011 Census

Faith	Number	%
Christian	155,597	65.6%
Buddhist	760	0.3%
Hindu	2,963	1.2%
Jewish	1,159	0.5%
Muslim	4,829	2.0%
Sikh	1,928	0.8%
Other Religion	648	0.3%
No Religion	53,549	22.6%
No Response	15,799	6.7%
Totals	237,232	100.0%

It is recognised that most faiths do not support gambling. The draft policy encourages the use of Local Risk Assessments in relation to the location of gambling premises and the proximity to churches, mosques, temples or other places of worship:

‘Applicants should also be aware of areas with concentrations of hostels and other types of accommodation for vulnerable people. Where they propose to make an application for the new grant of a premises licence, or a variation to an existing licence, in such areas they should explain fully in their Local Risk Assessment (LRA) how they will mitigate any risks of operating gambling premises in close proximity to concentrations of housing for vulnerable people or proximity to churches, mosques, temples or any other place of worship. Religious premises and places of worship are often focal points for a percentage of vulnerable members of the local community, including the homeless community and youth population, and have therefore been included in the policy, rather than for any

moral or ethical reasons.'

Sources used:

- 2011 Census

Protected Characteristic - Sexual orientation

*Please tick (✓)
the relevant box:*

Positive

Neutral

Negative

Overall impact: Neutral

No differential impact has been identified on the grounds of this protected characteristic. The Statement of Gambling Policy proposal applies equally to all traders operating in Havering irrespective of sexual orientation.

Evidence:

There is insufficient data available to measure accurately the potential effect of these proposals in relation to sexual orientation.

It is not believed that the Statement on Gambling Policy will have an impact in relation to this protected characteristic. However it is intended to include the group during the consultation process at:

info@haveringlgbtforum.co.uk

Sources used:

Protected Characteristic - Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: Neutral	
No differential impact has been identified on the grounds of this protected characteristic. The Statement of Gambling Policy proposal applies equally to all traders operating in Havering irrespective of gender reassignment.	
Evidence:	
There is insufficient data available to measure accurately the potential effect of these proposals in relation to gender reassignment.	
It is not believed that the Statement on Gambling Policy will have an impact in relation to this protected characteristic. However it is intended to include the group during the consultation process at: info@haveringlgbtforum.co.uk	
Sources used:	

Protected Characteristic - Marriage/civil partnership: Consider people in a marriage or civil partnership	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: Neutral	
No differential impact has been identified on the grounds of this protected characteristic. The Statement of Gambling Policy proposal applies equally to all traders operating in Havering irrespective of marriage/civil partnership.	
Evidence:	
In 2017 it is estimated that:	
<ul style="list-style-type: none"> • Single 27,558,916 • Married 24,249,371 • Civil Partnered 99,695 • Divorced 3,696,837 • Widowed 3,139,776 	
It is not believed that the Statement on Gambling Policy will have an impact in relation to this protected characteristic.	
Sources used:	
<ul style="list-style-type: none"> • Office for National Statistics (ONS) – Dataset Population estimates by marital status and living arrangements, England and Wales 	

Protected Characteristic - Pregnancy, maternity and paternity

Please tick (✓)
the relevant box:

Overall impact: Neutral

Positive

Neutral

Negative

No differential impact has been identified on the grounds of this protected characteristic. The Statement of Gambling Policy proposal applies equally to all traders operating in Havering irrespective of pregnancy, maternity and paternity.

Evidence:

2016 Data for Havering

- All Conceptions – 4,475
- Percentage all conceptions leading to abortion – 24.9%
- Conceptions under 18 – 106
- Percentage under 18 leading to abortion – 67%
- Conceptions under 16 – 13
- Percentage under 16 leading to abortion – 69.2%

2017 Data for Havering

- Fertility rate 1.91 children per woman
- Live births 3,393

It is not believed that the Statement on Gambling Policy will have an impact in relation to this protected characteristic.

Sources used:

- Office for National Statistics (ONS)

Health & Wellbeing Impact: Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity? Please use the Health and Wellbeing Impact Tool in Appendix 2 to help you answer this question.

Please tick (✓) all the relevant boxes that apply:

Positive ✓

Neutral ✓

Negative ✓

Overall impact: Neutral
 The Statement of Gambling Policy is likely to have both positive and negative impacts.

The legislative framework for gambling recognises it as a legitimate leisure activity that many people enjoy; it can be social, fun and as such might have positive impacts on wellbeing. In addition, it generates income, employment and tax revenue, creating employment, which is an important determinant of health and wellbeing.

However, set against this, it also generates significant dis-benefits such as working days lost through disordered gambling, or the cost of treatment for ill-health caused by stress related to gambling debt. Less easily measured are potentially very significant impacts such as the negative effects of some gambling on family relationships, and the psychological and social development of children.

The proposed statement of gambling policy is intended to address this negative issue by promoting responsible retailing and ensuring that those that apply for a license consider the impact of their business on this group.

The policy requires them to conduct a Local Risk Assessment and take appropriate measures to protect children and vulnerable persons including considering the location of the premises in relation to premises frequented by children and vulnerable persons and the provision of information regarding self-exclusion and leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box

Yes No

The Statement of Gambling Policy is likely to have both positive and negative impacts. The legislative framework for gambling recognises it as a legitimate leisure activity that many people enjoy; it can be social, fun and as such might have positive impacts on wellbeing. In addition, it generates income, employment and tax revenue, creating employment, which is an important determinant of health and wellbeing. However, set against this, it also generates significant dis-benefits such as working days lost through disordered gambling, or the cost of treatment for ill-health caused by stress related to gambling debt. Less easily measured are potentially very significant impacts such as the negative effects of some gambling on family relationships, and the psychological and social development of children. Similarly, there might be some indirect benefits, including positive social impacts when happy gamblers make a greater contribution to societal wellbeing than they would in the absence of gambling. Much less is known of these effects.

The statement of licensing policy has the following components which are intended to mitigate for harmful impacts and enhance positive impacts, including:

- As per the Gambling Commission's Guidance for Licensing Authorities, the Licensing Authority expects operators of gambling premises to have in place policies and measures to ensure children and other vulnerable people are protected from being harmed or exploited by gambling. Harm in this context is not limited to harm from gambling but includes wider child protection considerations, including the risk of child sexual exploitation.
- Encouraging applicants to conduct local risk assessments, particularly in relation to proximity to local housing, places of worship and/or other premises visited by children or vulnerable people. The Authority will expect the local risk assessment to consider:
 - The location of services for children such as schools, playgrounds, leisure/community centres and other areas where children and young people will congregate such as youth clubs, parks, bus stops, cafés, shops, entertainment venues such as cinemas, bowling allies and any other place where children are attracted.
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 - Whether the premises is in an area subject to high levels of crime and/or disorder, including areas that are prone to youths participating in antisocial behaviour, e.g. graffiti/tagging or underage drinking.
 - How vulnerable people, including people with gambling dependencies are protected.
 - Assessing staffing levels when a local college closes and the students begin to vacate the grounds.
 - Age verification policies such as 'Challenge 25'.
 - Line of sight from the counter to gambling machines.
 - Information held regarding self-exclusions and incidences of underage gambling.
 - Gaming trends that may mirror days for financial payments such as pay days or benefit payments.
 - Proximity of premises which may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate.
 - Concentrations of housing for vulnerable people.
 - Churches, mosques, temples or any other place of worship. Religious premises and places of worship are often focal points for a percentage of vulnerable members of the local community, including the homeless community and youth population, and have therefore been included in this policy, rather than for any moral or ethical reasons.

Sources used:

Gambling Commission (2018) Gambling-related harm as a public health issue.
<https://www.gamblingcommission.gov.uk/PDF/Gambling-related-harm-as-a-public-health-issue.pdf>

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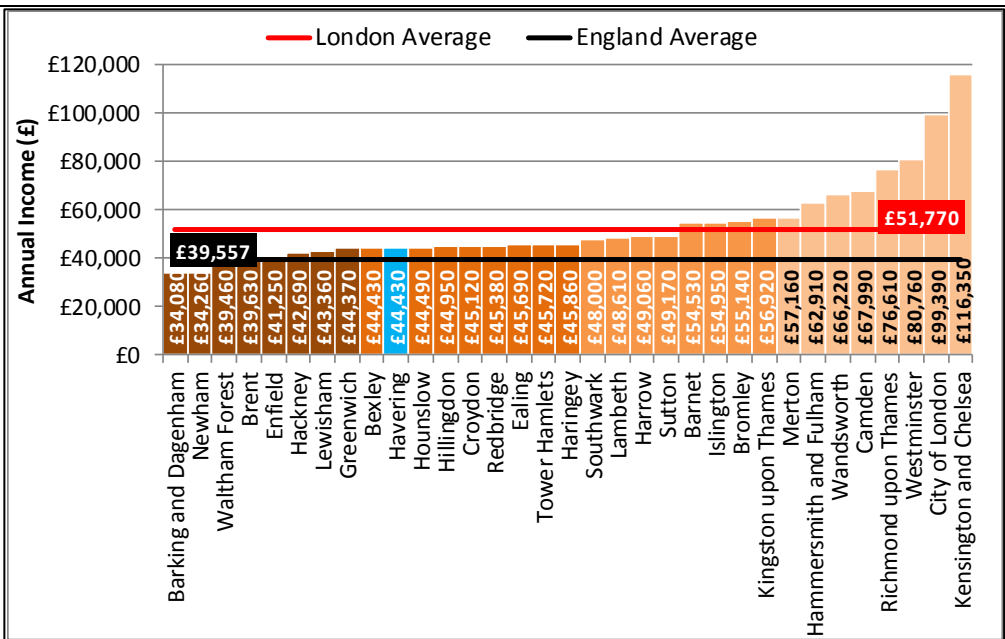
Socio – Economic impact:		
<i>Please tick (✓) the relevant box:</i>	<p>Overall impact:</p> <p>The Statement of Gambling Policy is likely to have both positive and negative impacts. Gambling generates income, employment and tax revenue, creating employment. However, set against this, it also generates significant dis-benefits such as working days lost through disordered gambling, or the cost of treatment for ill-health caused by stress related to gambling debt. For problem gamblers the effects on their personal and family finances are likely to be significant.</p> <p>There is some evidence to suggest that problem gambling affects those living in more deprived areas and therefore on lower incomes.</p> <p>The proposed statement of gambling policy is intended to address this negative issue by promoting responsible retailing and ensuring that those that apply for a license consider the impact of their business on this group.</p> <p>Section 8 of the Gambling Policy explicitly seeks to Protect Children and other Vulnerable Persons from being harmed or exploited by Gambling, including such measures as:</p> <ul style="list-style-type: none"> • Proof of age schemes • CCTV • Supervision of entrances/machine areas • Physical separation of areas • Specific opening hours • Self-barring schemes • Notices/signage • Measures/training for staff on how to deal with suspected truanting school children on the premises and how to recognise signs of potential child sexual exploitation • clear policies that outline the steps to be taken to protect children from harm; • Provision of information leaflets/helpline numbers for organisations such as GamCare and GambleAware. <p>Following the consultation all responses have been considered and where appropriate additional amendments adopted. Further controls include:</p> <ul style="list-style-type: none"> • Requiring that pubs with gaming machines adhere to the Code 	
Positive		✓
Neutral		
Negative		

		<p>of Practice for Gaming Machines in Clubs and Premises with an Alcohol Licence.</p> <ul style="list-style-type: none"> • Clarify that training for staff is not only in relation to the protection of children but also other vulnerable people. <p>The Licensing Authority would also encourage operators to consider participation in voluntary best practice or certification schemes to assist in their promotion of the objective of protecting children and other vulnerable persons from being harmed or exploited by gambling.</p> <p>The new policy offers more protection to vulnerable people by than the previous policy and therefore the overall assessment is considered to be positive.</p>
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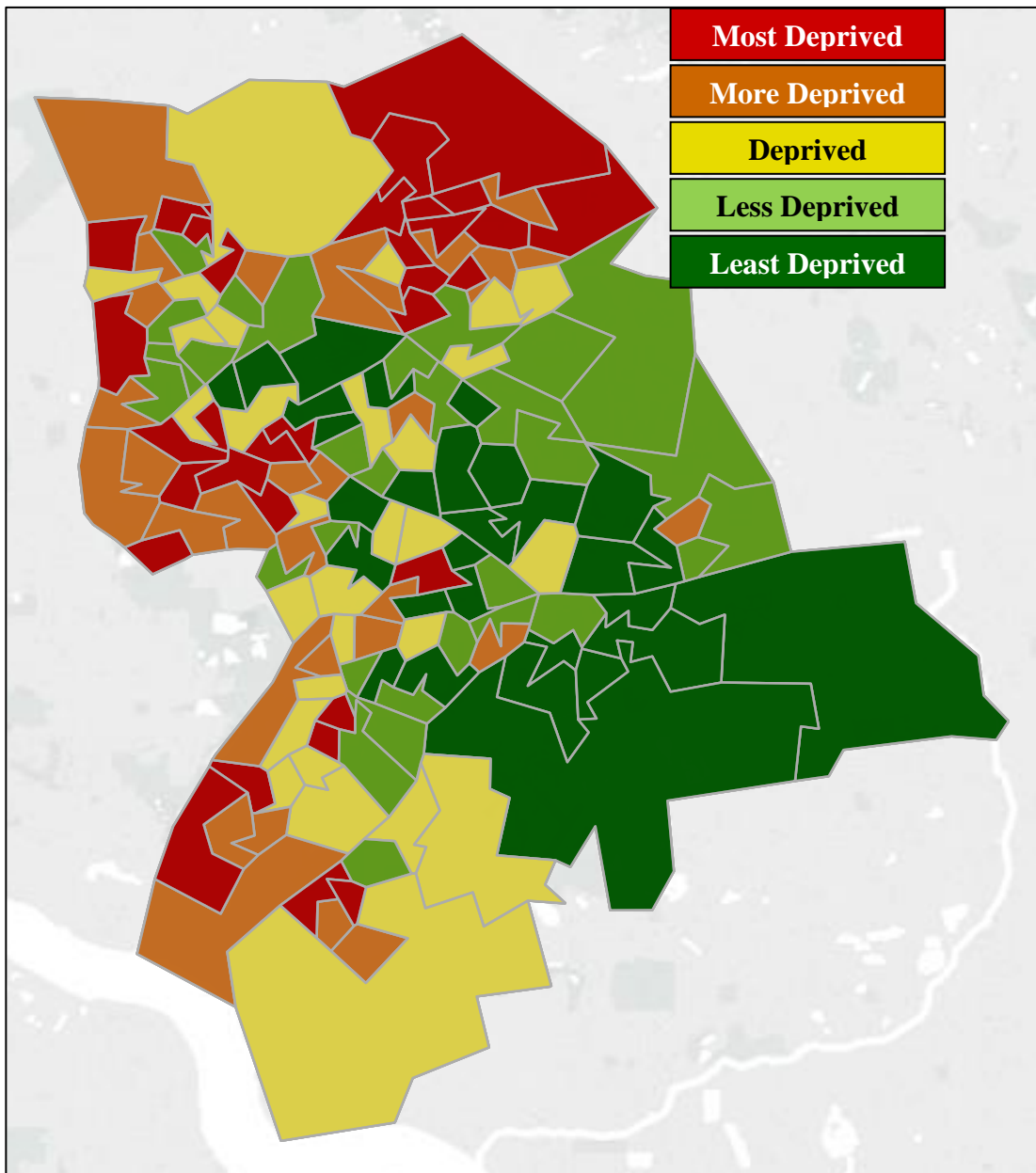
Evidence:

- The average gross income per household in Havering (£44,430, as measured in 2012/13) is low in comparison to the London average (£51,770) and slightly higher than the England average (£39,557).
- 77% of households in Havering have at least one car and compared to other local authorities in London, Havering has the second highest proportion of households (32.8%) with 2 or more cars.
- Majority of children in Havering are not poor, but around 8,800 live in income-deprived households. Gooshays and Heaton wards have the highest proportion of children living in poverty.
- About 77.9% of working age residents in Havering were in employment between April and June 2018. Overall employment rate in Havering is higher than London (74.6%) and England (75.9%)
- The proportion of working age residents in Havering claiming out-of-work benefits (6.8%) is significantly lower than England (8.4%).

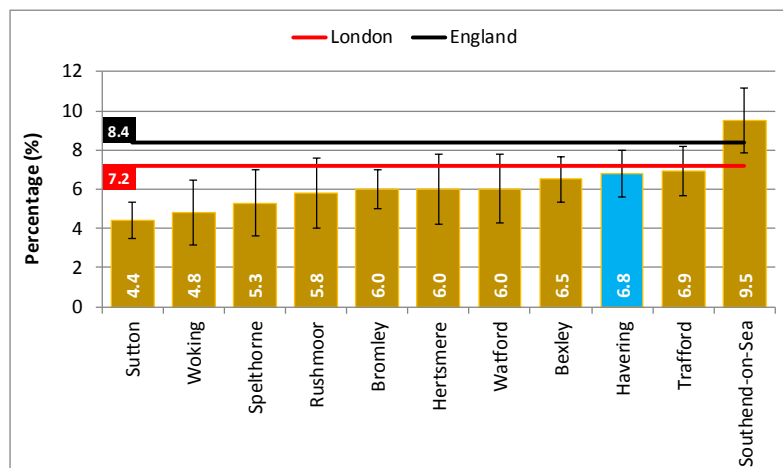
Income 2012/13



Income deprivation affecting Children, quintiles within Havering LSOA, 2015



Proportion of working age residents claiming out-of-work benefits in Havering and ONS statistical comparator group, November 2016



The Statement of Gambling Policy is likely to have both positive and negative impacts. Gambling generates income, employment and tax revenue, creating employment. However, set against this, it also generates significant dis-benefits such as working days lost through disordered gambling, or the cost of treatment for ill-health caused by stress related to gambling debt. For problem gamblers the effects on their personal and family finances are likely to be significant.

A report titled 'Problem gambling in Birmingham. A Rapid Assessment Report' published in May 2018 states that:

Just under 1% of the population in the UK have been identified as 'problem gamblers' with a further 4% identified as being of low to moderate risk of problem gambling. While these percentages are small, this amounts to around 400,000 problem gamblers in total and a further 2 million 'at risk'.

Unemployment and constrained economic circumstances

- Wardle (2015) concluded that the evidence relating to household income and problem gambling was mixed. Generally those of lower income are less likely to gamble but those that do spend a higher proportion of their income on gambling.

Area deprivation

- A review of a number of British surveys had, according to Wardle (2015), consistently shown that those living in more deprived areas are more likely to experience problems with their gambling behaviour. This was despite having roughly similar levels of past year gambling participation to those who live in less deprived areas.

While there are evidently crossovers in the characteristics of those that experience problem gambling and those at risk of financial exclusion, they are not necessarily the same group of people.

Those at risk of financial exclusion include those, for example, whose overdraft debt renders any working current account unusable (to such a degree that that person can no longer operate within the financial services mainstream any longer), or those who are

homeless having no proof of identification and being denied access to a basic bank account as a consequence.

We also know that impacts of problem gambling across the participants in another study (Kenyon et al, 2016) include losses being funded through overdrafts, family loans and informal borrowing, and loan sharks.

The statement of licensing policy has the following components which are intended to mitigate for harmful impacts and enhance positive impacts, including:

- As per the Gambling Commission's Guidance for Licensing Authorities, the Licensing Authority expects operators of gambling premises to have in place policies and measures to ensure children and other vulnerable people are protected from being harmed or exploited by gambling. Harm in this context is not limited to harm from gambling but includes wider child protection considerations, including the risk of child sexual exploitation.
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 - Concentrations of housing for vulnerable people.
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Sources used:

- This is Havering 2018 version 4.1 (August 2018) *produced by public health intelligence*
- Problem gambling in Birmingham. A Rapid Assessment Report May 2018

3. Review

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

Review:

Scheduled date of review: July 2023

Lead Officer conducting the review: Keith Bush

Please submit the completed form via e-mail to EqHIA@havering.gov.uk

Thank you.