

Camden Council Equality Impact Assessment Form

Before beginning this equality impact assessment (EqIA) form, you should use the EqIA screening tool to decide whether you need to complete an EqIA for your activity and read the EqIA guidance.

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;*
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and*
- promote good relations between people who share a protected characteristic and those who don’t.*

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact equalities@camden.gov.uk where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

Title of the activity:	
Statement of Licensing Policy under the Gambling Act 2005	
Officer accountable for the EqlA (e.g. director or project sponsor)	
Full name:	Jamie Akinola
Position:	Director of Public Safety, Supporting Communities
Directorate:	Public Safety & Supporting Communities
Email:	jamie.akinola@camden.gov.uk
Lead person completing the EqlA	
Full name:	Afshar Ahmad
Position:	Licensing Team Leader
Directorate:	Supporting Communities
Email:	afshar.ahmad@camden.gov.uk
Person reviewing the EqlA (reviewer)	
Full name:	William Sasu
Position:	Public Protection and Licensing Manager
Directorate:	Supporting Communities
Email:	william.sasu@camden.gov.uk

Step 1: Clarifying aims

1.a. Is it a new activity or one that is under review or being changed?

- New
 Under review
 Being changed

1.b. Which groups are affected by this activity?

- Staff
 Residents
 Contractors
 Other (please detail): Licensed Premises

1.c. Which Directorate does the activity fall under:

- Supporting People
 Supporting Communities
 Corporate Services
 More than one Directorate. Please specify:

1.d. Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

Officers have reviewed the Council's Statement of Licensing Policy (the Policy) under the Gambling Act 2005 (the Act). The Policy sets out the Council's licensing policies with respect to its functions under the Act and plays an important role in the Council's duty to manage the risk of gambling-related harm

in Camden and to regulate gambling activity to mitigate the risk of such harm.

The review ensures that the Council continues to have an effective and up to date Policy that complies with the law, reflects current circumstances and helps to deliver local priorities set out in the Camden Plan.

The primary focus of the Policy is to promote the three licensing objectives set out in the 2005 Act, which are:

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

Officers have assessed the potential impact of the Policy upon protected groups.

In order to inform the Policy, officers would usually carry out an assessment of the key characteristics of Camden in the context of gambling-related harm. The information obtained for the assessment helps to provide a better understanding of the types of people that are at risk of being vulnerable to gambling-related harm; where they are located and any current or emerging problems that may increase that risk.

This local assessment is contained in a document called “Camden’s Local Area Profile” (LAP) and the key areas in relation to the protected characteristics are summarised within this EIA.

The majority of information used in the assessment, is obtained from Census data provided by the Office for National Statistics. The information obtained in the Census 2021 is not yet available and we have been unable to update the LAP as part of the Policy review process.

In addition, over the last two years, we have faced unprecedented times as a result of the global pandemic, with particular hardship hitting the ‘high street’ gambling premises. These businesses have been subject to extended mandatory closures and restrictions. Consequently, the data is not available for the period of the pandemic and therefore cannot accurately inform the LAP and Policy review process. For these reasons, we have relied on the LAP created in 2019 and the information used in that assessment is set out in this EIA.

The Licensing Committee is being asked to consider and approve the revised Gambling Policy for consultation.

Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested?

Is there currently any evidence of discrimination or disadvantage to the groups?

What will the impact of the changes be?

*You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.*

2.a. Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- Age
- Disability, including family carers
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Age

Camden had a resident population of approximately 279,500 (mid 2020). In 2020 the average age of the population was 38.6 years in Camden, almost one year higher than London (37.4 years) but more than two years younger than for England (40.9 years). Almost half of Camden's population is made up of people aged 18-44 at 49%. Just over a third of the population (34%) is aged over 45. Camden also has a lower proportion of children aged under eighteen compared with England (17%). The growth in the next 20 years is mostly in the groups aged 45+. The health of the young and the old are impacted disproportionately from the effects of poor air quality levels.

Disability

In the 2021 Census, 15.2% of Camden's respondents said they suffered from a long-term illness that limited their daily activities in some form. This is lower than the national figure of 17.5% which could be due to Camden having a smaller proportion of older people than England and Wales as a whole. 3.4% of the borough's population provide 20 hours or more of unpaid care a week.

Gender Reassignment

Data on gender reassignment is not available at a borough level. However, the Government's Equalities Office tentatively estimate around 0.3-0.8% of the UK population are transgender. In Camden that would equate to between 700 to 2000 people.

Pregnancy and Maternity

In 2019, there were 2,448 live births to Camden resident mothers, giving a total fertility rate of 1.06 – the lowest fertility rate in England. This is likely to be associated with the high number of female university students who live in the Borough. Three fifths of births in Camden were to women born outside the UK (61%).

Marriage and Civil Partnership

The 2021 Census indicated that Camden had a lower proportion of married couples (30.8%) compared with Greater London (39.7%) and England and Wales (44.5%), but a higher proportion of civil partnership (0.6%) than Greater London (0.3%) and England and Wales (0.2%).

Race

More than a third (34%) of Camden's population are from Black, Asian and minority ethnic groups. Camden's largest single ethnic group is the Bangladeshi population - who comprise 4.4% of residents - though the borough is also home to a large non - British White Other population (27%), including White Irish (2.9%) and Other White (24.2%).

Religion and Belief

Camden's population comprises a diversity of religions and beliefs. At the 2021 Census 31.4% of people described themselves as Christian, 16.1% were Muslim and 4.8% were Jewish, whilst 34.6% stated that they have no religion. Camden has a higher proportion of people of Muslim and Jewish faith, and those who have no religion, than London as a whole and the rest of the UK.

Sex

Camden's population is currently 50.7% male and 49.3% female (mid 2021). Camden has a slightly higher proportion of males compared with London or the UK (50.1% and 49.5%). In Camden, the proportion of men is highest in the 25- 44 age group where they comprise 53% of the population. In contrast, women make up a higher proportion of the Borough's elderly population: 58% of those aged 75+ and 62% of those aged 85+ are female.

Sexual Orientation

The 2019 GP Patient Survey found that 8.5% of Camden residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – above the London average (6.1%) and the national rate (3.9%). This compares with figures from the 2018 Annual Population Survey that gives lower estimates for both London and England (3.5% and 2.9%). It is recognised that issues of non-response, and unwillingness to disclose sexual orientation on surveys, can have an impact on estimates.

Please note: The 2021 Census was undertaken during COVID-19 lockdown / restrictions. A number of people and households usually present in Camden were elsewhere at this time and therefore will not be seen in the 2021 Census data.

The Gambling Policy consultation was designed to seek a wide range of views across Camden's population on what their views were on the proposed Gambling Policy and amendments. It was open to everyone regardless of:

- Age
- Disability
- Gender
- Marriage or civil partnership
- Pregnancy or maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The consultation ran for twelve-weeks from November to March 2022. People were asked to submit their responses to the consultation by email.

The consultation was publicised with a short explanation and an email address provided for responses and was conducted as follows:

- An email/ letters to the neighbouring authorities, ward Cllrs, responsible authorities, residents associations and businesses (approximately 598 contacts)
- Advertised in the Camden New Journal on 22 December 2022
- publicity on the Camden Licensing webpages
- inclusion in the Council's newsletter to businesses

1 response was received from a residents association in support of the Gambling Policy.

2.b. Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

Low-income households

Households are considered to be in low income if they live on less than 60% of the median income. In Camden 60% of median income (i.e. £41,342) is £24,806 and 21.7% of households have an income less than this. This compares with 33.1% of households considered to be low income nationally and 27% in Greater London.

Parents (of any gender, with children under 18)

At the 2021 Census 11.9% of households in Camden contained couples who were married or in civil partnerships who had dependent children (compared to 14.3% nationally and 15.8% in Greater London). 6.4% of households were lone parent families with dependent children (compared to 4.5% nationally and 3% in Greater London), and 1.9% were co-habiting couples with dependent children (compared to 6.9% nationally and 7.8% in Greater London).

Single parent households

At the 2021 Census 5,945 households in Camden (6.4%) were lone parent families with dependent children (compared to 4.5% nationally and 3% in Greater London)

Social housing tenants

31,250 households in Camden lived in social rented accommodation at the 2021

Census (37.7%, compared to 17.1% nationally and 23.1% in Greater London)

Please note: The 2021 Census was undertaken during COVID-19 lockdown/restrictions. A number of people and households usually present in Camden were elsewhere at this time and therefore will not be seen in the 2021 Census data.

Evidence or data about the number of people with the following additional characteristics was not known:

- Foster Carers
- Looked after children/care leavers
- Refugees and asylum seekers
- People who are homeless
- Private rental tenants in deprived areas.

2.c. Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

Data or evidence about intersectionality could not be determined from the responses to the consultation.

Step 3: Impact

*Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.*

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote “good relations” – a better understanding or relationship between people who share a protected characteristic and others?

3 a. Potential negative impact on protected characteristics

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Age	No	
Disability including carers	No	
Gender reassignment	No	
Marriage/civil partnership	No	
Pregnancy/maternity	No	
Race	No	

Religion or belief	No	
Sex	No	
Sexual orientation	No	

3.b. Potential positive impact on protected characteristics

In reviewing the Policy, officers have considered data about protected characteristics and groups in Camden, whom the Policy may affect. They have also considered and set out other information and themes that may affect protected groups or characteristics.

The Policy is relevant to:

- all holders of premises licences, permits, notices and registrations under the 2005 Act and either issued by or given to Camden
- people who live or work in Camden or who visit the borough who may be affected by activities connected to premises authorised to carry out gambling activities under the 2005 Act

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	<p>The 2005 Act contains provisions, which specifically aim to protect children from being harmed or exploited by gambling. This means:</p> <ul style="list-style-type: none"> a) preventing children from taking part in gambling and b) restricting activities such as advertising, so that gambling products are not aimed at or appear attractive to children. <p>The Policy incorporates these aims and seeks to control the access of children to licensed premises and to prevent participation in or being exposed to gambling activities that may cause harm. This is a positive benefit of the Policy.</p> <p>The effects of gambling may lead to adverse financial, personal and social consequences upon individuals, their families, their social networks or the community which may affect all age groups.</p> <p>The Policy seeks to address these issues through measures to prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</p>

Disability including carers	No	<p>Disabled people may be subject to hate crime, which is any incident or crime, which is the victim or any other person perceives to be motivated because of a person's disability or perceived disability. This is "disability hate crime" and not necessarily associated with gambling activity.</p> <p>The Council cannot use the Policy to duplicate or enforce other legislation and as such, the Policy is unable to address some specific impacts on this group such as barriers to accessing licensed premises.</p>
Gender reassignment	Yes	Officers have not identified specific issues that will affect this protected group.
Marriage/civil partnership	Yes	Officers have taken into account that people in this group are likely to have more than one protected characteristic. They have not identified specific issues in respect of marriage or civil partnership protected characteristic.
Pregnancy/maternity	Yes	Officers have not identified specific issues that will affect this protected group.
Race	Yes	The Policy is a long and often complex document and consequently there may be communication barriers when engaging with this protected group. Officers have aimed to make the Policy easy to read and understand, but recognise that there may be occasions when the Council may need to translate the Policy into other languages.
Religion or belief	Yes	<p>Religion or belief may also overlap with other protected characteristics such as race. The issues experienced by different religious/belief groups may vary significantly.</p> <p>Officers have not identified any negative impact arising from the Policy on this protected group.</p>
Sex	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.

Sexual orientation	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.
--------------------	-----	---

3.c. Potential negative impacts on other characteristics

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster Carers	No	
Looked after children/child leavers	No	
Low-income households	No	
Refugees and asylum seekers	No	
Parents (of any gender, with children aged under 18)	No	
People who are homeless	No	
Private rental tenants in deprived areas	No	
Single parent households	No	
Social housing tenants	No	

3.d. Potential positive impacts on other characteristics

The LCIL ward priorities that have been proposed include themes such as community facilities, safety, air quality, and public realm, all of which have the potential to bring positive impacts to people with any of the other characteristics. Specific positive impacts are considered in the table below.

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
--------------------------	---	---------------------------------------

Foster Carers	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.
Looked after children/child leavers	Yes	The 2005 Act contains provisions, which specifically aim to protect children from being harmed or exploited by gambling. This means: a) preventing children from taking part in gambling and b) restricting activities such as advertising, so that gambling products are not aimed at or appear attractive to children. The Policy incorporates these aims and seeks to control the access of children to licensed premises and to prevent participation in or being exposed to gambling activities that may cause harm. This is a positive benefit of the Policy.
Low-income households	Yes	Gambling to supplement income and the effects of gambling may lead to adverse financial, personal and social consequences upon individuals, their families, their social networks or the community.. The Policy seeks to address these issues through measures to prevent gambling from being a source of income and being associated with crime or disorder or being used to support crime.
Refugees and asylum seekers	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.
Parents (of any gender, with children aged under 18)	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.
People who are homeless	Yes	Gambling to supplement income and the effects of gambling may lead to adverse financial, personal and social consequences upon individuals, their families, their social networks or the community.. The Policy seeks to address these issues through measures to prevent gambling from being a source of income.

Private rental tenants in deprived areas	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.
Single parent households	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.
Social housing tenants	Yes	Officers have not identified any negative impact arising from the Policy on this protected group.
Any other, please specify		

3.e. Consider intersectionality. Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

No specific positive or negative impact related to groups with a combination, or intersection of two or more characteristics are noted at this point.

Step 4: Engagement - co-production, involvement or consultation with those affected

4.a. How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?

All of Camden's communities including residents, neighbourhood forums, community organisations, Police, healthcare, businesses and ward councillors were consulted on the Gambling Policy Review.

4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

Other council service areas/teams including Children's safeguarding Board were consulted on the Gambling Policy.

They were invited to comment on the Draft Gambling Policy.

The ward councillors were consulted on Draft Gambling Policy and the proposed amendments.

Step 5: Informed decision-making

5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

<p>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations</p>	
<p>2. Continue the work as it is because no potential negative impacts have been found</p>	<p>It is proposed to continue the work since no potential negative impacts have been identified although it is noted that more responses from more people would have been preferable.</p>
<p>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</p>	
<p>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</p>	

Step 6: Action planning

6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

Action	Due	Owner
<p>Officers have considered whether the Policy could have an adverse impact that can be avoided and are satisfied that there is no identifiable adverse impact. However, this will be kept under review during the life of the Policy.</p>	<p>Ongoing</p>	<p>Licensing Team</p>

Step 7: EqlA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqlA and ask them to review the EqlA form before completing it. They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result. They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqlA form before completing this version and setting a date for its review. If you feel you could benefit from further advice, please contact the Equalities service at equalities@camden.gov.uk

EqlA author	Afshar Ahmad Licensing Team Leader 05 April 2023
EqlA advisor / reviewer	William Sasu Public Protection & Licensing Manager 05 April 2023
Senior accountable officer	Jamie Akinola Director Public Safety & Supporting Communities 05 April 2023