

CAMDEN EQUALITY IMPACT ASSESSMENT FORM

Introduction to this form

This is Camden's Equality Impact Assessment (EqIA) template, which should be used for all EqIAs carried out across the Council on a project, activity, change or decision (hereafter, 'activity'). Unless agreed with the Equalities Service in advance, no other template should be used for carrying out an EqIA.

Most activities that affect Council stakeholders (including residents and officers) 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 will usually 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 for any staff re-organisations.

EqIAs help the Council to fulfil its legal obligations under the Equality Act's Public Sector Equality Duty (PSED). The duty requires the Council to have due regard¹ 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.

EqIAs are our chosen method at Camden for demonstrating that we have given due regard to these three aims, and therefore that we are complying with the PSED.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities, during and following implementation, should also be regularly reviewed for their impact. As part of this process, EqIAs should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated.

Following each version of an EqIA, this should be signed off by the relevant sponsor, director or Head of Service.

For advice, support, or to request a review of your EqIA, please contact equalities@camden.gov.uk.

¹ 'Due regard' is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a decision has been made that may affect people who share each of the protected characteristics. Paying 'due regard' means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

Title of the activity	
Review of Camden Statement of Gambling Policy under the Gambling Act 2005	
Officer accountable for the EqlA (e.g. director or project sponsor)	
Full name:	Oliver Jones
Position:	Director of Recreation and Public Safety
Directorate:	Investment, Place and Opportunity
Email:	Oliver.Jones@camden.gov.uk
Lead person completing the EqlA (author)	
Full name:	Afshar Ahmad
Position:	Licensing Team Leader
Directorate:	Investment, Place and Opportunity
Email:	Afshar.Ahmad@camden.gov.uk
Person reviewing the EqlA (reviewer)	
Full name:	Jack Kilker
Position:	Equality Impact Quality Assurance Lead
Directorate:	Homes and Communities
Email:	Jack.Kilker@camden.gov.uk
Version number and date of version	
Version 1 (23/06/2026)	

Section 1: Background

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

- ☐ New
☒ Under review
☐ Being changed

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

- ☐ Council staff
☒ Residents
☐ Contractors
☒ Other – please specify: Licensed venue operators; gambling operators / permit holders

1.c. Which Directorate(s) does this activity fall under?

- ☐ Adults and Health
☐ Children and Learning
☐ Corporate Services
☐ Homes and Communities
☒ Investment, Place and Opportunity
☐ Multiple Directorates – please specify:

1.d. Outline the aims, objectives and scope of the activity

You should provide a summary rather than lots of detail copied from other reports or documents. This summary should always include at the least the following:

- Why is this work happening and why is it happening now?
- Is there any useful context about previous work linked to this activity which needs to be considered?
- Who will be impacted by this work? How, and why do we know this?
- What is going to happen as a result of the proposed activity?

A Statement of Gambling Policy must be determined and published every three years under the Gambling Act 2005. During each three-year period, the Council must keep the Policy under review and make any revisions that it considers appropriate.

In 2025-2026, the Council reviewed and updated Camden's Statement of Gambling Policy (The Policy) under the Gambling Act 2005 together with its Local Area Profile (LAP).

The Policy sets out how the Council will exercise its gambling licensing functions in relation to premises licences, permits, notices, registrations and enforcement

The LAP is Camden's local evidence base. It is used alongside the Policy to identify place-based risk and vulnerability in the borough, particularly in relation to the protection of children and other vulnerable persons from gambling-related harm.

In Camden, place-based risk is most likely to arise where gambling premises or applications intersect with concentrations of children and young people, higher education campuses and student populations, major transport hubs and transient footfall, the evening and night-time economy, deprivation, homelessness or temporary accommodation, and support-service locations. The updated LAP highlights the Euston–King's Cross–St Pancras corridor, Bloomsbury, Camden Town and other high-footfall commercial areas, and parts of Kilburn and Kentish Town, as broad locations where these combined risks may be more relevant and should be considered carefully on a case-by-case basis.

Compared with the previous policy, this review does more than refresh the statutory text. It updates the local evidence base and ward geography; strengthens references to children, young people and other vulnerable persons; makes clearer the expectation that operators use local risk assessments and consider nearby schools, colleges, support services and other sensitive uses; and aligns the Policy with current Camden public health, deprivation, housing and gambling-harm evidence.

These changes are expected to support the licensing objectives by improving the quality of operator risk assessments, helping officers and responsible authorities focus on local risk, and improving the transparency and consistency of decision-making.

The review aims to:

- reflect current legislation, Gambling Commission guidance and local evidence;
- use updated Camden demographic, deprivation, housing, public health and gambling-harm data;
- strengthen expectations on operators to assess and mitigate local risk;
- support fair, transparent and proportionate case-by-case decision-making; and
- balance the legitimate operation of gambling businesses with the need to protect residents, communities and those at greater risk of harm.

The Policy and LAP do not create blanket restrictions; they provide an evidence-led framework. The framework is applied through pre-application advice, officer assessment of premises licences and permits, scrutiny of operator local risk assessments, sub-committee decision-making where relevant, and ongoing inspection, compliance and enforcement work. It is also used to guide discussion with operators about local mitigations such as supervision, age verification, staff interaction, self-exclusion information and access to support to reduce problem gambling.

Problem gambling is gambling that has become harmful, and is serious enough to disrupt or damage a person's life, such as their finances, relationships, work, wellbeing, or daily functioning. The Gambling Commission defines it as gambling "to a degree that compromises, disrupts, or damages family, personal or recreational pursuits."

Officers have taken into consideration the Policy review alongside the refresh of the LAP and assessed the potential impact this may have on protected groups. The considerations are set out in this EIA.

Section 2: Evidence and data

In this section you should outline the evidence or data available to support your assessment of the potential negative and positive impacts of the proposed activity.

This should be evidence or data which is specific to the protected characteristics and the additional characteristics identified as priorities by the Council. It should not be generic data which cannot be linked to any specific characteristics. The evidence or data used should include or be one of the following:

- Demographic or representation data (e.g. Census data)
- Engagement or participation data relevant to the activity (e.g. user data, data on registrations, etc.)
- Findings gathered through feedback or complaints from relevant stakeholder groups (e.g. resident complaints, public consultations, engagement surveys)
- Research publications, evidence or policy documentation produced by Government, charities or research organisations (e.g. a publication by Age UK)

2.a. Evidence and data linked to the protected characteristics in the Equality Act 2010:

Please select each of the protected characteristics you have evidence or data for, then set out this evidence or data in the field below.

If evidence or data is not currently available, use the action plan ('Section 6') to describe how you will ensure you hold relevant evidence or data in the future.

Select all characteristics where evidence or data has been identified:

- ☒ Age
- ☒ Disability²
- ☐ Gender reassignment³
- ☒ Marriage or civil partnership
- ☐ Pregnancy or maternity
- ☒ Race or ethnicity
- ☒ Religion or belief⁴
- ☒ Sex⁵
- ☒ Sexual orientation⁶

Age

The table below illustrates Camden's population by age group. (2021 Census data)

Age group	Number	Percentage
0 – 9 years	19,875	9.40%
10 – 19 years	24,126	11.40%
20 – 29 years	42,196	20.10%
30 – 39 years	37,075	17.60%
40 – 49 years	27,818	13.20%
50 – 59 years	25,015	11.90%
60 – 69 years	16,265	7.70%
70 – 79 years	11,347	5.40%
80+ years	6,287	3.00%
Total	210,145	100.00%

² The Equality Act defines a disability as a condition or experience which has a significant impact on someone's ability to carry out day-to-day activities and which has a long-term impact (12 months or more over the course of a person's life). This includes a diverse range of people with physical, mental and sensory impairments, long-term health conditions, mental health conditions and / or neurodivergence. Carers who provide unpaid care for a person who is disabled are also included in the protections of this characteristic.

³ This is the legal term in the Equality Act. This is understood to apply to people who may describe themselves as trans or transgender, who have undergone, are undergoing or are planning to undergo a process of transitioning from the sex they were assigned at birth to another sex.

⁴ This characteristic covers religious or philosophical belief. The lack of religion or belief is also covered.

⁵ This characteristic protects from discrimination on the basis of biological sex, rather than certificated sex or gender identity – specifically, this would refer to female and male.

⁶ This characteristic refers to a persons sexual orientation toward a person of the same sex, opposite sex or either sex.

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Age is particularly relevant to gambling harm. Camden's updated evidence shows that around 43% of residents are aged under 30 and that the borough also contains almost 30,000 students. National evidence referenced in the LAP shows that younger adults who gamble are more likely to report severe adverse consequences than older age groups; for example, recent national survey evidence found this among 18- to 34-year-olds at a much higher rate than among people aged 55 and over. In this context, severe adverse consequences means serious financial, emotional or relationship harms such as debt, difficulty meeting living costs, conflict with family or deterioration in mental wellbeing. The 2024 Young People and Gambling survey also found that 27% of 11- to 17-year-olds had spent their own money on some form of gambling in the previous year, with 1.5% screening as experiencing problem gambling.

Disability, including invisible disabilities and learning disabilities

In the 2021 ONS Census, of 210,145 residents, 15.2% were disabled under the Equality Act. Breaking this group down further, 6.7% of the population stated that their disability limited their day-to-day activities a lot, 8.5% said their disability impacted their day to day activities a little. A further 5.7% of the population did not qualify as disabled under the Equality Act but had long-term physical or mental health conditions that did not limit their day to day activities.

Neurodivergence such as Autism, ADHD, dyslexia and dyspraxia, whether or not the resident identifies themselves as disabled

In the [Adult Social Care Activity and Finance Report](#), in 2023/24, an estimated 435 adults aged 18-64 received support for a learning disability during the 23/24 reporting year.

The draft Gambling Policy uses the statutory licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. It does not assume that all disabled people are vulnerable, but it does recognise that some disabled people, including people with mental ill health, learning disabilities or cognitive impairments, may face heightened risk of harm in some circumstances.

The draft LAP also identifies mental ill health, substance misuse and wider vulnerability as relevant risk factors for gambling-related harm.

Marriage and civil partnership

The table below illustrates Camden's population by marital and civil partnership status.

Relationship status	Number	Percentage
Single	99,156	55.7%
Married	54,665	30.7%
In a registered civil partnership	1,033	0.6%
Separated, still legally married or in a civil partnership	3,933	2.2%
Divorced or civil partnership dissolved	13,124	7.4%
Widowed or surviving civil partnership partners	5,998	3.4%
All usual residents aged 16 and over	177,909	100.0%

The Council has not identified any specific evidence that the draft Gambling Policy or LAP will affect people differently because they are married or in a civil partnership.

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This protected characteristic may overlap with other characteristics and household circumstances, including sex, age, pregnancy and maternity, caring responsibilities and low income. However, no direct negative impact has been identified. The policy is regulatory and applies borough-wide on the basis of the licensing objectives.

Race

Camden's population is ethnically diverse. In 2021, 40% of Camden residents were from Black, Asian or other ethnic background groups.

Ethnic group	Number	Percentage
White British	74,348	35.4%
White Irish	5,325	2.5%
White Gypsy or Irish Traveller	128	0.1%
White Roma	978	0.5%
White Other	44,285	21.1%
Asian or Asian British	38,042	18.1%
Black or Black British	18,892	9.0%
Mixed or Multiple Ethnic Groups	13,938	6.6%
Other Ethnic Group	14,200	6.7%
All ethnic groups	210,145	100%

The issues identified here were drawn from a review of the updated Local Area Profile, JSNA / public health material on gambling-related harm, Census 2021, Camden deprivation and demographics evidence, and officer consideration of how residents access licensing information, support and services. This is therefore a combination of local evidence and service judgement; it is not based on any assumption that any ethnic group is inherently more likely to gamble or to cause harm.

- Communication and access: some residents may face language or literacy barriers when trying to understand licensing information, consultation documents, support information or self-exclusion/signposting materials.
- Intersection with deprivation and low income: some residents from minority ethnic communities may also be disproportionately affected by poverty, overcrowding or wider inequality, which are factors that can reduce resilience and increase vulnerability to gambling-related harm.
- Community engagement and trust: the Council should therefore use accessible publication, targeted consultation and evidence-led case-by-case assessment rather than relying on stereotypes or generic assumptions about any community.

Religion or belief

The table below illustrates Camden's population by religion or belief, according to the 2021 Census.

Religion	Number	Percentage
Buddhist	2,410	1.3%
Christian	65,980	34.0%
Hindu	3,991	1.4%
Jewish	10,079	4.5%
Muslim	33,830	12.1%
No religion	72,776	25.5%

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Other religion	1,842	0.6%
Sikh	487	0.2%
Religion not stated	18,743	20.5%
All groups	210,145	100%

Camden is religiously diverse. The Council has not identified Camden-specific evidence that the draft Policy or LAP will affect residents differently because of religion or belief. However, some religions and belief systems discourage or prohibit gambling, which is relevant to consultation and engagement. The Policy is therefore applied neutrally and evidence-led, and consultation on the draft Policy has been extended to faith groups as part of the wider review process.

Sex

The information below illustrates Camden's population by sex, according to the 2021 Census:

- Females – 110,580, 52.7%
- Males – 99,424, 47.3%

The Council has considered whether gambling harms and the local gambling environment may affect women and men differently. National evidence shows that men are more likely to gamble and more likely to experience direct gambling harm, while women are more likely to be affected others and may experience related harms through household financial pressure, relationship strain and, in some cases, domestic abuse. In Camden, although local sex-disaggregated data is limited, the updated Policy and Local Area Profile are intended to have a positive effect by strengthening the identification of vulnerability, informing local risk assessment, supporting staff interaction and improving signposting for both people who gamble and those affected by someone else's gambling.

Sexual orientation

The Office for National Statistics (ONS) (2021 Census) suggests that in Camden, 82.6% of the population identify as heterosexual/straight; 6.2% identify as gay, lesbian, or bi-sexual; 0.7% have another sexual identity and 10.5% did not answer.

The Council has not identified specific evidence that the draft Gambling Policy or LAP will have a differential negative impact on people because of sexual orientation.

2.b. Evidence and data linked to the additional priority characteristics identified by Camden Council:

Please select each of the additional characteristics where relevant data has been identified and set out this evidence or data in the field below.

If evidence or data isn't currently available, use the action plan ('Section 6') to describe how you will ensure you hold relevant evidence or data in the future.

Select all characteristics where evidence or data has been identified:

☐ Foster carers

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- ☐ Care-experienced young people⁷
- ☒ Low-income households
- ☒ Refugees and asylum seekers
- ☐ Parents / carers (of any gender, of young people aged under 18)
- ☒ People who are homeless
- ☒ Private rental tenants in deprived areas
- ☐ Single parent / carer households (of any gender, of young people aged under 18)
- ☐ Social housing tenants
- ☒ Any other (please specify):

Low-income households

This is a significant characteristic for the purposes of the LAP. Camden's updated evidence notes that 18% of households had equivalised annual income below £30,000. The borough is also more deprived than around two-thirds of local authorities in England on IMD 2025, with 21.5% of its Lower Layer Super Output Areas (LSOAs) among the 20% most deprived nationally and four LSOAs within the 10% most deprived. Cost-of-living pressures, debt and attempts to supplement income are all relevant pathways through which low-income households may be more vulnerable to gambling-related harm.

Refugees and asylum seekers

No specific Camden gambling-harm evidence has been identified for this group. However, secondary research on gambling harm affecting migrants and migrant communities suggests that language barriers, stigma, insecure work, debt, social isolation and reduced awareness of support can all worsen risk and make harms harder to identify. That does not establish a direct adverse impact from the Policy itself, but it does support accessible information, neutral decision-making and clear signposting to support.

Parents (of any gender, with children aged under 18)

This characteristic is relevant because the Policy's core statutory objective includes the protection of children from harm. The children and young people evidence is also directly relevant here: national survey evidence shows that 27% of 11- to 17-year-olds had spent their own money on gambling in the previous year, with 1.5% screening as experiencing problem gambling. The updated Policy and LAP should therefore help parents and carers indirectly by strengthening the focus on schools, colleges, youth settings, age verification, supervision and the visibility of gambling products.

People who are homeless

The LAP identifies homelessness, rough sleeping and temporary accommodation as important vulnerability factors in Camden. Recent borough evidence indicates that 975 people were seen rough sleeping in 2024/25, and local health needs evidence also points to substantial numbers of homeless households in temporary accommodation. This group is therefore directly relevant to the Policy and LAP, because gambling-related harm can compound debt, instability and barriers to support.

⁷ 'Care experienced' will apply to young people who have been 'looked after' at some point in their childhood and are entitled to receive services under the Children Act 1989, Leaving Care Act 2000 and the Children and Social Work Act 2017. As such, it does not include children who have been adopted as their support and services are covered under the Adoption and Children Act 2002.

Private rental tenants in deprived areas

The LAP identifies deprivation, housing pressure and financial insecurity as relevant vulnerability factors. This is supported by Camden's wider evidence on deprivation, social housing demand, overcrowding and the high cost of housing. The point here is not that private renting itself causes gambling harm, but that people living in deprived areas or under financial pressure may have reduced resilience if harm occurs. The updated Policy and LAP support a more place-based approach to those risks.

Any other, please specify

Students and young adults, affected others, and people in contact with debt advice, mental health, homelessness or substance misuse services remain relevant groups identified in the updated LAP. Camden has 11 higher education institutions and almost 30,000 students, while local public health material estimates that around 600 residents are gambling at levels causing harm, around 5,000 are gambling at levels that put them at risk of harm, and around 13,000 are harmed by someone else's gambling.

2.c. Evidence or data on intersectionality:

Please present here any evidence or data which indicates specific or different outcomes, experiences or opportunities arising for people who experience intersecting or overlapping forms of discrimination⁸.

This is not necessarily about collecting or presenting different evidence or data to that already set out above. It is about ensuring that your analysis of the available evidence or data takes account of intersectional experiences – for example, the specific experiences of Black women, disabled parents or LGBTQ+ people who are homeless.

This review identifies several important intersectional vulnerabilities. Camden's updated evidence shows that around 43% of residents are aged under 30; 18% of households have equivalised annual income below £30,000; 21.5% of Camden's LSOAs are among the 20% most deprived nationally, including four in the 10% most deprived; and recent borough evidence recorded 975 people seen rough sleeping in 2024/25. Local public health material also estimates that around 600 residents are gambling at levels causing harm, around 5,000 are at risk of harm, and around 13,000 are harmed by someone else's gambling.

These risks do not fall neatly within a single protected characteristic. For example, younger adults may also be students or care-experienced; disabled residents may also experience low income or housing instability; some minority ethnic or migrant residents may also face language barriers and financial stress; and parents, carers and affected others may experience harm indirectly through another person's gambling.

The updated Policy and LAP are expected to have a positive impact because they encourage officers and operators to consider those overlapping circumstances in a place-based, evidence-led way. The main risk would be if generic assumptions were made about particular communities or neighbourhoods; that risk is mitigated by requiring case-by-case assessment rather than blanket restrictions.

Evidence and data have been identified through Camden's updated Local Area Profile, Camden JSNA / public health material on gambling-related harm, Census 2021 and recent Camden State of the Borough evidence. This draft EqIA should be updated again once the formal consultation closes so that any additional equality evidence and learning can be incorporated before final adoption.

Evidence and data have been identified through Camden's updated Local Area Profile, Camden JSNA / public health material on gambling-related harm, Census 2021 and recent Camden State of the Borough evidence. Formal consultation responses should be incorporated into the final EqIA where they add further equality evidence.

Remember to use the action plan ('Section 6') to set out actions you will take to ensure that any gaps in the evidence or data you have available can be addressed and filled for future updates to this EqIA.

⁸ Intersectionality is "the interaction and cumulative effects of multiple forms of discrimination affecting the daily lives of individuals". ([Britannica](#))

Section 3: Analysis of impact

You should use this section to outline the potential impacts you have identified which might occur for people on the basis of each of the protected and additional characteristics set out in this EqIA. Your analysis should be informed by the evidence and data considered and presented in 'Section 2' and you should clearly refer back to this evidence and data.

Potential impacts identified should only be those that are specific to any particular characteristics, rather than listing general positive or negative implications of the activity which would affect people regardless of their characteristics.

If you select 'No impacts identified' you must justify how you have reached this conclusion through your assessment. If you select 'Insufficient evidence', you should consider including an action in the action plan ('Section 6') to address this gap.

Protected characteristics (established by the Equality Act 2010)	Is there a potential positive or negative impact on this characteristic arising from the proposed activity? (Select all that apply)	Describe the potential <u>positive</u> impact(s) which have been identified (Please explain the evidence used to identify the positive impact(s))	Describe the potential <u>negative</u> impact(s) which have been identified (Please explain the evidence used to identify the negative impact(s))
Age	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The draft Policy and LAP are likely to have a positive impact on the basis of age because they strengthen the focus on protecting children and young people, including through local risk assessments, location-based scrutiny near schools, colleges and youth settings, age verification, supervision, advertising controls and clearer expectations on operators.	
Disability	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The Policy and LAP are likely to have a positive impact because they support local risk assessments, staff interaction with customers, identification of vulnerability, and signposting to support. Accessible publication and clear	No direct negative impact identified. Risks of indirect disadvantage is mitigated by accessible publication and clearer signposting expectations.

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		signposting should continue to be considered in implementation.	
Gender reassignment	☐ Potential positive impact ☐ Potential negative impact ☒ No impacts identified ☒ Insufficient evidence		
Marriage or civil partnership	☐ Potential positive impact ☐ Potential negative impact ☒ No impacts identified ☐ Insufficient evidence		
Pregnancy or maternity	☐ Potential positive impact ☐ Potential negative impact ☒ No impacts identified ☒ Insufficient evidence		
Race or ethnicity	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The specific positive impact is that the updated Policy and LAP rely on current local evidence, wider consultation and clearer expectations about accessible information and signposting, rather than generic assumptions about communities. This should support fairer, more transparent case-by-case decisions in a diverse borough.	
Religion or belief	☐ Potential positive impact ☐ Potential negative impact ☒ No impacts identified ☐ Insufficient evidence		
Sex	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified	The positive impact expected from the updated Policy and LAP is that their stronger focus on vulnerability identification, local risk assessment and signposting may benefit both	

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	☐ Insufficient evidence	the person gambling and affected others. This is relevant to sex because men are more likely to experience direct gambling harm, while women may be more likely to experience some harms indirectly through family finances, coercion or domestic abuse.	
Sexual orientation	☐ Potential positive impact ☐ Potential negative impact ☒ No impacts identified ☐ Insufficient evidence		

Additional characteristics (priorities for Camden Council)	Is there a potential positive or negative impact on this characteristic as a result of the proposed activity? (Select all that apply)	Describe the potential <u>positive</u> impact(s) which have been identified (Please explain the evidence used to identify the positive impact(s))	Describe the potential <u>negative</u> impact(s) which have been identified (Please explain the evidence used to identify the negative impact(s))
Foster carers	☐ Potential positive impact ☐ Potential negative impact ☒ No impacts identified ☒ Insufficient evidence		
Care-experienced young people	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The stronger focus on protecting children and vulnerable young people is relevant to this group.	

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Low-income households	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The LAP and Policy explicitly recognise the link between low income, cost-of-living pressures and gambling-related harm, which supports more targeted local risk assessment and harm reduction.	
Refugees and asylum seekers	☐ Potential positive impact ☐ Potential negative impact ☒ No impacts identified ☐ Insufficient evidence		
Parents and / or carers	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	Measures relating to locations near schools, colleges and family-oriented settings, access controls, supervision, age verification and the visibility of gambling products are likely to have an indirect positive effect on parents and carers by reducing risks to children.	
People who are homeless	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	Homelessness and temporary accommodation are now expressly reflected in the LAP as relevant vulnerability factors for local scrutiny. Strengthened local risk assessment expectations and consideration of support-service locations are likely to have a positive effect for this group.	
Private rental tenants in deprived areas	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The evidence-led focus on deprivation, housing insecurity and financial pressure is relevant to this group.	
Single parent and / or carer households	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The wider focus on preventing gambling-related harm, protecting children and recognising financial vulnerability is relevant to this group.	

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Social housing tenants	☐ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	The expected positive impact is indirect: the updated LAP draws clearer attention to deprivation, housing pressure and local vulnerability, which should support more evidence-led scrutiny of applications and operator mitigations in places where social housing tenants may be affected by wider financial stress.	
Any other (please specify)	☒ Potential positive impact ☐ Potential negative impact ☐ No impacts identified ☐ Insufficient evidence	Students and young adults, affected others, and people in contact with mental health, debt, homelessness and substance misuse services are all identified in the LAP as relevant vulnerability groups.	

Please describe any potential positive or negative impacts you have identified as a result of the proposed activity on any intersectional groups

Please describe the intersectional groups, the potential impacts identified and the evidence or data used in your assessment.

The Council has identified that vulnerability to gambling-related harm in Camden is often intersectional rather than linked to a single characteristic in isolation. The updated Local Area Profile shows that a number of risk factors frequently overlap geographically and socially. Camden has a comparatively young population, with 43% of residents aged under 30 and 66% under 45, and it also has 11 higher education institutions and almost 30,000 student residents, particularly concentrated in Bloomsbury. At the same time, the borough experiences marked inequality: 18% of households had equivalised annual income below £30,000 in 2025, 21.5% of Camden's LSOAs fall within the 20% most deprived nationally, and four LSOAs are within the 10% most deprived. The LAP also highlights severe housing pressure, with 8,380 households on the social housing waiting list, 975 people seen rough sleeping in 2024/25, and over 500 homeless households in temporary accommodation. These factors can combine with poor mental health, debt, unstable employment, and wider caring or family responsibilities to increase susceptibility to gambling-related harm and to reduce resilience when harm occurs.

The LAP therefore adopts a place-based approach by looking not just at who may be vulnerable, but where overlapping vulnerabilities are most likely to be concentrated. It identifies the relevance of locations with high numbers of young people and students, deprivation hotspots, homelessness and temporary accommodation, mental health and substance misuse services, debt advice and food support, and major transport and night-time economy areas. In practice, this means the updated Policy and LAP are designed to help the Council and operators consider the

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combined risks present in areas such as the Euston–King’s Cross–St Pancras corridor, Bloomsbury, Camden Town, Kilburn, and parts of Gospel Oak and Kentish Town. The LAP also notes that around 600 residents are estimated to be gambling at harmful levels, around 5,000 at levels that put them at risk of harm, and around 13,000 are harmed by someone else’s gambling, showing that impacts may extend beyond the individual gambler to family members and others in the household. This is why the Council has treated intersectionality as an important part of the equality analysis and of the local risk-based approach in the Policy.

Section 4: Consultation and engagement

4.a. How have you consulted or engaged with those who will potentially be impacted by the activity (either directly or through engagement with organisations representing these groups)?

Consultation and engagement should be relevant to the specific activity being considered through this EqIA (although it may not have been carried out specifically because of the EqIA being carried out).

You should describe what the consultation process looked like, when it took place and how many people were involved. You should also be able to show how what you learned through this consultation or engagement has factored into your equalities thinking in this EqIA.

Group(s) engaged and details of engagement	Issues raised through the consultation or engagement, related to one or more protected or additional characteristics	Learning or impact for equalities thinking
Policy development and pre-consultation scoping took place during the 2025-26 review of the Policy and LAP. This draft EqIA has been informed by officer and partner engagement together with the available local evidence base. Formal public consultation on the draft Policy and LAP is expected to run for 12 weeks before final adoption and to include residents groups, community associations, ethnic group associations, faith groups, traders' associations, neighbouring licensing authorities, all responsible authorities, Camden Ward Councillors, community safety partners, MOPAC and gambling businesses/operators. The review has also been	Key issues identified through policy development and available evidence include: • protection of children and young people; • risks to students and young adults; • vulnerability linked to low income, deprivation, homelessness and temporary accommodation; • the need for clear operator risk assessments and signposting to support; and • the importance of using current local data rather than generic assumptions. The final EqIA should record the volume and broad themes of	Key learning for equality thinking at this stage is that consultation and publication need to be accessible and plain-English; the Council should actively seek views from communities likely to experience indirect harm or barriers to support; and the final version should test whether respondents identify any further issues for children, affected others, faith groups, disabled residents or people facing financial hardship.

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informed by Camden Public Health / JSNA work on gambling-related harm and the updated Local Area Profile evidence base.	responses once formal consultation closes	
Internal and partner engagement has included, or should include, Licensing, Public Health / JSNA, Community Safety, Planning, Environmental Health, Safeguarding, the Metropolitan Police and other relevant services involved in understanding local risk and vulnerability	The main themes from internal evidence and partner discussion are the need to: • align the Policy with the updated Local Area Profile; • reflect current ward geography and current demographic / deprivation evidence; • address vulnerabilities around children, young people and other vulnerable persons; and • maintain a proportionate, evidence-led approach to individual applications and operator risk assessments.	Partner engagement reinforced that equality impacts are most likely to arise through overlapping vulnerability and place-based factors rather than through blanket effects on a single protected group. It also highlighted the need to use JSNA / public health evidence, safeguarding knowledge, ward mapping and support-service locations when implementing the Policy and LAP.

4.b. How have you engaged with other Council services or relevant external partners or suppliers who would be involved in the delivery of the activity?

This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

Licensing
Public Health / JSNA / Public Health Intelligence
Safeguarding Children and relevant adult safeguarding / vulnerability services
Trading Standards
Metropolitan Police

Section 5: Assessment

At this point in the form, you should have considered the available evidence and whether there are any potential positive or negative impacts identified against each of the protected and additional characteristics, and on the basis of any intersectional identities and experiences.

Using the analysis you have done so far, you are now asked to determine which of the below outcomes is most appropriate for this activity.

You should provide a clear, brief rationale for the conclusion reached in this section and should use the action plan in 'Section 6' to set out mitigating actions that need to be taken in response to the outcome of this assessment.

Please select one of the below assessment outcomes:

Assessment outcomes	
☐	1. Activity can continue as it is: No negative impacts have been identified, so the work can continue
☐	2. Activity has justifiable negative impacts: Negative impacts have been identified but these can be justified as a proportionate means of achieving a legitimate aim
☒	3. Activity has negative impacts that can be managed: Negative impacts have been identified but these can be balanced against identified positive impacts and / or can be addressed by changing the activity and / or introducing mitigating actions ('Section 6')
☐	4. Activity cannot continue: Significant negative impacts have been identified, or mitigating actions cannot be taken, meaning the work must be stopped
Narrative / justification for the above selection	
The review can proceed, subject to the mitigations, publication arrangements and monitoring actions set out in this EqIA. The draft Policy and LAP have been adapted to: - strengthen the treatment of children, young people and other vulnerable persons; - reflect current local evidence on deprivation, low income, homelessness, housing pressure and gambling-related harm; - make clearer the expectation for local risk assessments, staff interaction and signposting to support; and - improve the local evidence base that informs licensing decisions and operator engagement.	

Section 6: Action plan

Use the template action plan below to set out actions that will be taken to address any potential negative impacts identified through this EqlA, or to support any potential positive impacts which have been identified. Be as specific and detailed as possible about the actions needed and how these will be carried out.

If other teams, services or partners would be required to support or input into the delivery of any actions, please ensure they are consulted prior to the EqlA being signed-off.

You should also make it clear through your action plan how you will ensure there is appropriate governance and oversight of your EqlA and the actions in this action plan, including how the EqlA will continue to be reviewed and updated.

Action	Responsible lead(s)	Delivery timeframe	Expected impact / outcome / measures
Publish the final Statement of Gambling Policy and Local Area Profile in accessible digital formats and ensure links/signposting are clear.	Licensing Team	On adoption	Improves accessibility and reduces the risk of indirect disadvantage for disabled residents, people with limited English or local knowledge, and communities seeking support information.
Use the updated LAP and current vulnerability evidence in application assessment, operator engagement and enforcement work.	Licensing / Responsible Authorities	Ongoing from adoption	Keeps implementation evidence-led and focused on children, students, deprivation, homelessness, affected others and other locally relevant vulnerabilities.
Ensure applicants and operators are clearly directed to risk assessment expectations relating to schools, colleges, youth settings, deprivation, homelessness and support-service locations.	Licensing Team	Ongoing from adoption	Improves the quality and consistency of operator risk assessments and strengthens practical mitigations at premises level.

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Review whether consultation responses raise any additional equality issues and update the EqlA before final sign-off if required.	EqlA author / reviewer	Before final adoption	Ensures the final EqlA captures any new equality evidence or concerns raised through consultation before the Policy is adopted.
Work with Public Health / JSNA and partners to monitor emerging evidence on gambling-related harm and vulnerability.	Licensing / Public Health	Within 12 months and ongoing	Strengthens the ongoing evidence base and helps identify any emerging unequal impacts or new vulnerable groups.
Refresh the LAP evidence and mapping periodically, including complaints, enforcement and updated demographic / ward data.	Licensing / Public Health Intelligence	Periodic review / next refresh	Prevents outdated assumptions from being relied on and supports periodic review of geographic risk and vulnerability evidence.

Section 7: Review and sign-off

Once you have completed your EqlA, use this section to confirm agreement and sign-off from relevant parties.

Once this section has been completed, this version of the EqlA is finalised. At this point it should be saved as a PDF and sent to equalities@camden.gov.uk for performance monitoring.

Lead person completing the EqlA (author)	
Full name:	Afshar Ahmad
Position:	Licensing Team Leader
Date of sign-off:	18/06/2026
Person reviewing the EqlA (reviewer)	
Full name:	Jack Kilker
Position:	Equality Impact Quality Assurance Lead
Date of sign-off:	23/06/2026
Officer accountable for the EqlA (e.g. director or project sponsor)	
Full name:	Oliver Jones
Position:	Director of Recreation and Public Safety
Date of sign-off:	
Expected date of next review	
01/11/2026	