



Equality Impact Assessment Form

Before completing this form, please refer to the Equality Impact Assessment Guidance documents and training materials

- EQIA Intranet Infohub
- [EQIA Guidance](#)

The Equality Impact Assessment (EQIA) will identify how any proposed policies, practices, activities, service changes or procedures will impact or affect different groups or communities if implemented. It supports officers in assessing whether the impacts are positive, negative, or unlikely to impact each of the nine protected characteristic groups. The assessment will also demonstrate whether there are ways to proactively advance equity, equality, diversity and inclusion. An EQIA is required before you finalise your proposal, or it may not be legally compliant.

If you have any questions or need feedback on your analysis, please contact the EDI team: CSPT.EDI@cityoflondon.gov.uk

Section 1: To be completed by all

Details of the lead officer completing the Assessment	Joe Mannix Licensing Policy Officer Joe.mannix@cityoflondon.gov.uk
Department Responsible:	Licensing
Who has been involved in creating the EQIA: (please summarise/list stakeholders you have engaged with and how)	Policy consultees and public consultation.
Date of Initial assessment:	17/10/2024
Dates of review (as applicable)	To be reviewed at next policy refresh.

Please refer to the EQIA guidance when completing this form

1. PROPOSAL OVERVIEW

What does the proposal aim to achieve? Please outline your proposal below

- If no potential impacts are identified at this stage, proceed to **Section 3**
- If you believe there may be potential impacts, continue to **Section 2** to complete a full EQIA.

The renewal of the Statement of Licensing (“Policy”) seeks to achieve the statutory functions required of the City Corporation, under the Gambling Act 2005. The Act requires that the Licensing Authority reviews their policy at least once every three years.

The Policy covers the licensing of physical gambling within the City of London. Primarily, this covers Betting, Bingo, Adult Gaming Centres, Licensing Family Entertainment Centres and Gambling Machines in Premises licensed for the sale of alcohol. The Gambling Commission is the regulator for remote gambling.

The proposal seeks to renew the existing policy, with updated information, formatting, and minor text amendments.

The proposal is a statutory matter, which allows the City to establish the principles it uses to determine the issuance of gambling premises licences. Primarily, our policy is focussed on ensuring that licences are granted to appropriate locations, avoiding sensitive locations to increase community cohesion.

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Section 2: To be completed for a full EQIA

2. EVIDENCE AND IMPACT ANALYSIS

Please highlight the potential impact on these groups, actions taken to mitigate impact and advance equality, diversity and inclusion (include data/evidence upon which the analysis is based)

Protected Groups:

- Age
- Disability
- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Race
- Religion & Belief
- Sex
- Sexual Orientation

Additional Groups

- Socio-economic background
- Care leavers
- Carers & Parents
- Veterans

Where relevant note relevant intersectional impacts: where combinations of different group identities may result in unique or compounded impacts.

Several studies have identified protected characteristic groups as being disproportionately affected by gambling-related harms. These groups include:

1. **People with Disabilities:** Studies have shown that individuals with disabilities are more likely to experience gambling problems. This may be due to factors such as increased isolation, limited employment opportunities, and higher rates of mental health conditions. This was indicated in the Gambling Commissions research on vulnerability in gambling.
2. **People with Mental Health Conditions:** Research suggests a strong association between gambling and mental health issues, with individuals experiencing conditions like depression, anxiety, and bipolar disorder being at higher risk. These conditions can contribute to impulsive behaviour and difficulty coping with negative emotions, making individuals more vulnerable to gambling addiction. This was indicated in a study undertaken by the National Centre for Social Research.
3. **People from Marginalised Communities:** Studies have indicated that individuals from marginalized communities, such as those living in poverty, experiencing homelessness, or facing discrimination, are at a higher risk of gambling-related harms. Economic hardship, social isolation, and limited opportunities can contribute to gambling being used as a coping mechanism.

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This was indicated in the Gambling Commissions research on vulnerability in gambling.

4. **Older Adults:** While gambling rates among older adults may be lower than in younger populations, studies have shown that they are still at risk of experiencing gambling-related problems. Factors such as loneliness, boredom, and financial insecurity can contribute to gambling among older adults. This has been indicated in studies by GambleAware.
5. **People from Minority Ethnic Groups:** Some studies have suggested that individuals from certain minority ethnic groups may be at a higher risk of gambling-related harms. Cultural factors, language barriers, and limited access to support services can contribute to vulnerability. This was indicated in the Gambling Commissions research on vulnerability in gambling.

It's important to note that these are general trends, and individual experiences may vary. Factors such as the type of gambling, access to treatment, and personal circumstances can also influence an individual's risk of harm.

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3. STAKEHOLDER ENGAGEMENT, MITIGATIONS AND CHANGE

Outline any consultation/engagement activity and additional information gathered not outlined above (if relevant)

Include information on stakeholders involved, and methods used for engagement / consultation.

Describe any further work required on proposals as a consequence of engagement/consultation (if relevant)

A public consultation was held from the 17th September to the 15th October 2024, in order to assess any areas which were not accounted for in our original policy.

Of note, the members of public that responded felt that gambling was negatively impacting young people due to the prevalence of online advertising. This is contradicted by the studies that have been carried out by The Gambling Commission, which found that 82% of young people who had seen or heard adverts about gambling said that it did not prompt them to spend money on gambling.

However, young people are inherently at the higher end of risk with regard to gambling by virtue of their legal status.

To tackle this, the Gambling Commission has raised the age verification scheme required of gambling operators to challenge 25. They also require operators to regularly and periodically test purchase their own stores to ensure that age verification measures are being adhered to. This has led to a positive impact on young people by means of the increased protections placed on their interactions.

Furthermore, there are general safeguards provided by the Gambling Commission in the form of their Licence Conditions and Codes of Practice, by which all operators are bound. Our policy is unable to affect these conditions, but focusses more on increasing community cohesion, by ensuring gambling premises are in suitable locations.

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4.MONITORING AND REVIEW

Will you monitor and review the impact of the proposal once it has been put into effect, if so how? What are the timescales for reviewing the EQIA once proposals are implemented?

This may take the form of an action plan - template available here

The proposal will be reviewed when the Gambling Commission release their new guidance to local authorities, which is expected in 2025; or, in any case, within three years of the policy being adopted. It may also be reviewed when information is received that there is an impact on our PSED.

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Section 3: To be completed by ALL

5.RECORDING YOUR DECISION AND SIGN-OFF

Detail the decision of how your proposal will progress.

Describe any changes or mitigations needed for adverse impacts.

Include negative impacts that require justification.

The proposal will continue, inline with our statutory obligations. The proposal promotes positive impact to our communities by increasing community cohesion; by ensuring premises licences are not granted near to sensitive areas.

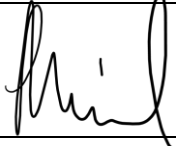
The general rules and regulations surrounding the Gambling Act 2005 are the purview of the Gambling Commission. The City Corporation has a duty to grant licenses under the Gambling Act 2005, unless there is clear evidence that the gambling licensing objectives are being undermined.

Equality and diversity issues are monitored and regularly by the Gambling Commission throughout the course of the year. Any necessary changes that may change or mitigate adverse outcomes are dictated by the Gambling Commission's License Conditions and Codes of Practice, and are leveraged against the Operator's Licence.

Please refer to the EQIA guidance when completing this form

Sign off

1. Officer completing the EQIA

Name	Joe Mannix
Job Title	Licensing Policy Officer
Date	18/10/2024
Signature	

2. Line Manager

Name	
Job Title	
Date	
Signature	

3. Senior Manager or Chief Officer

Name	Rachel Pye
Job Title	Assistant Director Public Protection
Date	19.10.24
Signature	Rachel Pye.

Once this form has been signed off, please send a copy of the form to the EDI Team: CSPT.EDI@cityoflondon.gov.uk