



HILLINGDON
LONDON

Appendix C - Equality Impact Assessment

STEP A) Description of what is to be assessed and its relevance to equality

What is being assessed? Please tick

Review of a service Staff restructure Decommissioning a service

Changing a policy Tendering for a new service A strategy or plan

The review of the Council's Statement of Gambling Policy which takes place every 3 years and must be in place by the end of 2022.

Who is accountable? E.g. Head of Service or Corporate Director

London Borough of Hillingdon – 'The Licensing Authority'

Date assessment completed and approved by accountable person

1st August 2022

Names and job titles of people carrying out the assessment

Daniel Ferrer, Licensing Team Manager

A.1) What are the main aims and intended benefits of what you are assessing?

Comprehensive review and consultation to implement the Council's new Statement of Gambling Policy. As a result, it is intended that this assessment will support effective and efficient delivery of licensing functions and the Council's objectives and allow for stakeholders views to be taken into account.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

The main users of the service that will be affected will be the actual applicants. Looking at previous applications and licences granted for premises licence holders, it is clear that they are mainly limited companies such as William Hill, Ladbrokes and Jennings. Therefore, we do not foresee and issues as their relevant applications and documentation will be dealt with by agents or their solicitors.

However, service users who may be affected are potentially staff and customers who work and use certain licenced premises and their services. For example, there are a large number of betting shops in the south parts of the Borough such as Hayes. From inspections and visits to these premises, the equality profile of staff and customers come from a Black, Asian, Minority and Ethnic Background.

Furthermore, another relevant key service user will be residents. Again, residents who are generally based geographically in the south may be affected. They will be made from a Black, Asian, Minority and Ethnic background and have always played an important role when submitting representations/objections and therefore providing a voice for the local community.

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Applicants and licence holders	Ensure that they are supported by the Authority in making their applications and kept fully informed of the process and the implications of the reviewed Statement of Gambling Policy.
Residents and Businesses	Ensuring that specific requirements have been met by the applicant/licence holder and they are able to submit their objection/representation if it is valid under the legislation.
Licensing Committee, Cabinet & Council	Ensuring processes are followed in accordance with licensing legislation and that all information is presented to them in full so appropriate, reasonable and proportionate decisions can be made.
Chief Executive, Corporate Directors & Staff	Ensuring processes are followed in accordance with licensing legislation and that all information is presented to them in full so appropriate, reasonable and proportionate decisions can be made.

A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

Only tick the boxes which relate to the data you have in A2.

Age	✓	Religion or belief	✓
Disability	✓	Sex	✓
Gender reassignment	✓	Sexual Orientation	✓
Marriage or civil partnership	✓	Community Cohesion	✓
Pregnancy or maternity	✓	Community Safety	✓
Race/Ethnicity	✓	Other – please state	

STEP B) Consideration of information; data, research, consultation, engagement

B.1) Consideration of information and data - what have you got and what is it telling you?

The main source of data and information are the current records kept by the Licensing Authority such as applications for premises licences and gambling permits. In addition, there is the information and feedback received from officers who engage with applicants on the phone or with Management and staff face to face during site visits. It is noted that a number of staff and customers at licenced gambling premises in the geographical south of the borough are from a Black, Asian, Minority and Ethnic Background. This is particularly the case with premises in areas such as Hayes. This is evident when inspections have been carried out to premises such as betting shops.

Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick ✓ NO ✓ YES

If no, explain why:
 It was not felt necessary to complete consultation as part of this assessment however, in the implementation of the policy, there will be ongoing engagement

with relevant parties during formal consultation.

B.3) Provide any other information to consider as part of the assessment

The new Statement of Gambling Policy is not anticipated to have a significant impact as there is a strong degree of consistency between the old and new document, it is merely reflecting minor updates to legislation and guidance.

On the whole, the amendments proposed have been drafted to clarify, formalise and, in some cases, simplify the processes in relation to applications under the Gambling Act 2005. The principles governing the Statement of Gambling Policy remain consistent with the previous policy statement and recognise the wider community impacts that the Licensing Authority, residents, business community and other stakeholders must be aware of when participating in the licensing process. The new Statement of Gambling Policy recognises the need for a balance between the rights of businesses and the community.

The Licensing Authority have a public sector equality duty to the following protected characteristics:

- Age
- Disability
- Sex, gender reassignment, sexual orientation
- Pregnancy and maternity
- Race, religion or belief
- Marriage and Civil Partnership

Under the Equality Act 2020 (S.149) a public authority must, in the exercise of its functions, have due regard to the need to:-

- (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 2010 Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

C) Assessment

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** impacts (actual or potential):

Equality Group	Impact on this group and actions you need to take
Applications from a Black, Asian, Minority and Ethnic background	<p>There will be some staff at Gambling premises from a Black, Asian and Minority Ethnic background whose first language may not be English and who will therefore require some assistance and clarification when Licensing Officers are carrying out their enforcement role. For example, this could mean Officers taking their time and carefully explaining what requirements they are checking, what documents are to be produced and any follow up measures that are needed to comply.</p> <p>In regards to residents and potential difficulties with submitting representations, the Licensing Team will offer advice on the telephone and will accommodate appointments during office hours. In addition, consideration will be given to officers carrying out site visits to meet potential objectors so they are able to gain a better understanding of any proposed application.</p>

C.2) Describe any **POSITIVE** impacts

Equality Group	Impact on this group and actions you need to take
Applications from a Black, Asian, Minority and Ethnic background	<p>Better quality of applications and reports being submitted and as a result residents, responsible authorities and members of the Licensing Committee being well informed to make decisions in considering applications. Residents will feel valued and felt heard when they will be able to communicate their views on behalf of their community. Furthermore, better relationships will be formed with Council Officers and staff and so there will be higher standards of compliance when the applicants operate.</p>

D) Conclusions

The Licensing Team has identified that there a number of gambling premises that have staff and customers from a Black, Asian, Minority and Ethnic background. This will be particularly the case where premises are located in the south of the Borough. In addition, residents in this geographical area will be of a similar background.

Literacy issues may be an issue within these communities and will therefore need to be considered. Local residents will require some assistance with applications, supporting documentation and explanation of Government guidance and the Council's Statement of Gambling Policy.

Licensing Officers will take appropriate steps to explain their enforcement role whilst carrying out inspections and compliance visits to staff and all management. There is already a requirement for authorised officers to leave a formal notice after their inspection fully explaining the reason for their visit and information to full access to records of any inspection. The Licensing Team will offer telephone advice to residents and consideration will be given to meeting residents at Council Offices to assist them in clarifying relevant application forms.

A handwritten signature in black ink, appearing to read 'D. Ferrer', is positioned in the upper left area of the page. The signature is stylized and written over a light grey rectangular background.

Signed and dated: 01.08.22

Name and position: Daniel Ferrer, Licensing Team Manager