

## Enfield Equality Impact Assessment (EqIA)

### Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected e.g. equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

**The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.**

## SECTION 1 – Equality Analysis Details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	LBE Statement of Principles (generally referred to as the Gambling Policy)
<b>Lead officer(s) name(s) and contact details</b>	Ellie Green: ellie.green@enfield.gov.uk, 0208 1322 128
<b>Team/ Department</b>	Licensing Team/Business Regulation
<b>Executive Director</b>	Sarah Cary
<b>Cabinet Member</b>	Cllr Savva
<b>Date of EqIA completion</b>	2 November 2021

## SECTION 2 – Summary of Proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

**Please summarise briefly:**

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

Licensing authorities are required by the Gambling Act 2005 to publish a Statement of Principles that they propose to apply when exercising their functions under the 2005 Act. The Statement of Principles must be published at least every three years and can be reviewed from “time to time” with any amended parts re-consulted upon. The 2022-2025 Statement of Principles has been circulated for public consultation for a period of 8 weeks.

The objective of the Statement of Principles is to inform applicants and interested parties of the principles the licensing authority proposes to apply when exercising its functions under the Gambling Act 2005. The authority must have regard to the licensing objectives as set out in section 1 of the Act:

- Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime;

- Ensuring gambling is conducted in a fair and open way;
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The licensing authority aims to permit the use of premises for gambling:

- In accordance with any relevant Code of Practice issued by the Gambling Commission.
- In accordance with any guidance issued by the Gambling Commission
- Reasonably consistent with the licensing objectives
- In accordance with the Authority's Statement of Principles.

From April 2016 gambling operators must conduct local risk assessments for their premises to demonstrate that they understand local issues and to show what measures they propose to introduce to mitigate against the risk of harm to children and vulnerable persons. (Gambling Commission's Licensing Conditions and Codes of Practice responsibility code provision 10.1.1).

The Gambling Commission's Licence Conditions and Codes of Practice and Social Responsibility Code Provisions state that licensees must review (and update as necessary) their local risk assessments:

- a. to take account of significant changes in local circumstance, including those identified in this policy;
- b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
- c. when applying for a variation of a premises licence; and
- d. in any case, undertake a local risk assessment when applying for a new premises licence.

The council will expect the local risk assessment to consider the urban setting:

- The proximity of the premises to schools.
- Whether the premises is in an area of deprivation.
- Whether the premises is in an area subject to high levels of crime and/or disorder.
- The ethnic profile of residents in the area.
- The demographics of the area in relation to vulnerable groups.
- The location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather.
- The range of facilities in the local area such as other gambling outlets and entertainment type facilities.

The local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected:

- The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
- Information held by the licensee regarding self-exclusions and incidences of underage gambling.
- Arrangements in place for local exchange of information regarding self-exclusion and gaming trends.
- Gaming trends that may mirror days for financial payments such as pay days or benefit payments.

- Arrangements for monitoring and dealing with under-age persons and vulnerable persons, which may include dedicated and trained personnel, leaflets, posters, self-exclusion schemes, window displays and advertisements not to entice passers-by etc.
- The provision of signage and documents relating to games rules, gambling care providers and other relevant information,
- The proximity of premises that may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, and doctor surgeries.

The local risk assessment should show how children are to be protected:

- The proximity of institutions, places or areas where children and young people frequent such as schools and entertainment venues.
- The proximity of places where children congregate such as bus stops, cafes, shops etc.

Other matters that the risk assessment may include:

- Details as to the location and coverage of working CCTV cameras, and how the system will be monitored.
- The layout of the premises so that staff have an unobstructed view of persons using the premises.
- The number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those persons using the premises.
- Where the application is for a betting premises licence, the location and extent of any part of the premises which will be used to provide facilities for gambling in reliance on the licence.

Such information may be used to inform the decision the council makes about whether to grant the licence, to grant the licence with special conditions or to refuse the application.

The Statement of Principles does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome.

There are 79 licensed gambling premises within the district; these currently consist of 5 bingo premises, 3 adult gaming centres and 71 betting shops. These are located across the borough with concentrations in certain areas.

The Statement of Principles supports a culture of openness where appropriate information can be accessed by all parties, hearings are generally held in public and enforcement is in line with the principles promoted within the council's enforcement policy. Partnership working and exchange of information (within legal constraints) is also supported by the Statement of Principles. In this way we hope to promote understanding between those providing gambling opportunities and those potentially affected by them.

One of the key purposes of the Statement of Principles is to assess gambling related harm and locations that have been identified as more vulnerable to problem-gambling and ensuring that gambling premises operators and applicants for new

licences must use Enfield's data-backed Local Area Profile to identify local risks and state what control mechanisms they will employ. The Local Area Profile identifies hotspots in areas deemed more vulnerable but does not exclude areas that are not considered vulnerable.

### **What are the main gambling-related harms and the impacts of these?**

Gambling related harms are defined as "the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society". Problem gambling is defined by the Gambling Commission as gambling "to a degree that compromises, disrupts or damages family, personal or recreational pursuits".<sup>1</sup>

In accordance with the Gambling Commissions recent gambling harms framework and previous publications, the types of harms that have been considered as part of the local area profile detailed below are as follows:<sup>2</sup>

- Gambling associated crime (acquisitive and those at a gambling premises)
- Unemployment, financial stress and income deprivation
- Health issues
- Children being exposed to gambling (accidental or otherwise).

### **What is changing in the Statement of Principles review?**

The purpose of Enfield's Local Area Profile document is to identify the areas most vulnerable to gambling-related harm. Enfield, as the licensing authority, has modelled where such risks might be more acute to certain areas versus others. This has included an assessment of the key characteristics of the borough to identify areas of higher risk of vulnerability to gambling-related harm.

The Local Area Profile has been devised from a data-led analysis of the borough of Enfield. The data used covers a range of information including the location of educational establishments and leisure services, medical facilities, and care homes, through to areas of income and employment deprivation, as some examples. The source for these examples were extracted from Enfield Council GIS server in February 2021. ASB data has also been sourced from the Metropolitan Police Service.

The Local Area Profile has been in place since the 2016 Statement of Principles was introduced, and that data has been updated on each review of the policy since and again ahead of the 2022 policy publication.

The Equalities Impact Assessment has attempted to assess the likely impact of the revised policy on persons living, visiting and working within Enfield.

<sup>1</sup> <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-vs-gambling-related-harms>

<sup>2</sup> <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-vs-gambling-related-harms>

This Statement of Principles is set to have a positive impact aligning with the priorities of Enfield Council including, but not limited to, safe, healthy and confident communities. This report gives a thorough assessment of the impact on equality within Enfield Borough that the implementation of this Statement of Principles may have.

## SECTION 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (e.g. people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

**Age**

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

There are nearly 75,920 children (0-15) living in the borough of Enfield. This represents 22.8% of Enfield's total population and is higher than the 19.1% national average.<sup>3</sup>

Research conducted by the Gambling Commission has identified that young people and students, based on their age, are at a higher risk to gambling-related harm and problem gambling. In Enfield, there are 19,892 15 to 19-year olds, and 18,167 20 to 24-year olds, a total of 11.4% of Enfield's population. These age ranges are considered the ages of young people who are of working age but may be NEET (not in employment, education or training).<sup>4</sup>

The changes to the Statement of Principles will create a positive result for young people and students who are more at risk of developing gambling-related problems or suffering from gambling-related harm. The Local Area Profile is based on multiple factors including assessing the proximity of education institutions with students of 13-24 years (secondary schools and colleges) and entertainment venues to gambling premises. This highlights the scale and nature of the risks to these age groups. The risk assessment that the premises will complete will ensure they consider control mechanisms such as using a proof of age scheme and door supervisors or altering the gambling operation such as how the premises is advertising and what marketing materials targeted to young people they may have in, or on the outside of the premises. Children, young people and vulnerable people can see into the premises and see gambling taking place therefore considerations must also be given as to the design and layout (internal and external) of the premises.

Although young people and students are considered at a higher possible risk to gambling-related harm, not all young people and students will suffer, or be at risk, of suffering harm. The Statement of Principles change will not increase the chance of people not previously considered to be at risk to succumb to gambling-related harm as a result of its implementation.

Measures are stated in the Statement of Principles that will help protect vulnerable and young people as the protection of children and vulnerable persons from harm is one of the licensing objectives.

<sup>3</sup> ONS mid-year estimates 2020

<sup>4</sup> <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/exploring-the-gambling-journeys-of-young-people>

<b>Mitigating actions to be taken</b>
None required.

<b>Disability</b>
<p>A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.</p> <p>This could include: Physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.</p>
<p>Will the proposed change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people with disabilities?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>At the 2011 Census, 47,979 Enfield residents (15.4% of the total) reported a long-term health problem or disability, this means people whose day-to-day activities are limited a lot or a little by a disability or long-term medical condition. 52.5% of people with a disability or long-term health problem were of working age (16-64 years).<sup>5</sup></p> <p>Research by NatCen in the Gambling Behaviour in Great Britain in 2015 states that problem gambling rates were higher among those who were economically inactive for reasons other than unemployment, full-time study or retirement (such as long-term illness or disability, or were looking after the family home).<sup>6</sup></p> <p>A large proportion of mental health problems are considered to be a form of disability under the Equality Act 2010 if they have a long-term effect on the individual's normal day-to-day activity. It is considered that people who suffer from such disabilities may be more at risk, however, in this case it is likely to be people with mental disabilities who are at risk of gambling-related harm or problem gambling based on this characteristic.<sup>7</sup></p> <p>The changes to the Statement of Principles will have a positive impact on people considered to have a disability under the Equalities Act 2010. The Local Area Profile is informed by data that considers that people with a disability may frequent, such as locations of medical facilities, care homes and temporary accommodation.</p> <p>Therefore, the implementation of the proposed Statement of Principles changes, for</p>

<sup>5</sup> <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2021-your-council.pdf>

<sup>6</sup> <https://natcen.ac.uk/media/1464625/gambling-behaviour-in-great-britain-2015.pdf>

<sup>7</sup> <https://www.legislation.gov.uk/ukpga/2010/15/section/6>

operators of licensed premises to have due regard of the Local Area Profile, will help reduce the risk of vulnerable people developing gambling-related problems because through the completion of risk assessments, licensed premises will have an improved understanding and focus on local risks and mitigating gambling-related harm.

This will mean that operators will need to consider the implementation of strategies to mitigate this, for example, increasing staff levels and the requirement of staff training to help staff members spot and help people who may be vulnerable due to a disability.

This Statement of Principles will therefore have a positive impact on people with this protected characteristic.

It is important to note, that not all people who have a form of disability are likely to or will suffer from problem gambling or succumb to gambling-related harm.

#### **Mitigating actions to be taken**

Measures are stated in the Statement of Principles that will help protect vulnerable people, which includes those with a disability.

### Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

It is unlikely that the Statement of Principles will lead to differential impact for people based on this protected characteristic because the policy has no particular impact on gender reassignment.

### Mitigating actions to be taken

None required.

### Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected

The Gambling Commission research on problem gambling behaviour concluded that people with gambling problems often experience relationship breakdowns.<sup>8</sup>

From October 2020 to October 2021, MPS data suggested that there were 6,282 Domestic Abuse Incidents and 4,019 Domestic Abuse Offences in the borough of Enfield. These offences range from common assault, criminal damage, affray, actual bodily harm, grievous bodily harm, sexual offences and other offences.<sup>9</sup>

<sup>8</sup> <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-vs-gambling-related-harms>

<sup>9</sup> <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/domestic-and-sexual-violence-dashboard>

Although not all of these domestic-violence related crimes will be related to behavioural characteristics brought on by problem gambling, a proportion of these crimes may be linked to relationship breakdowns with gambling problems as a contributing factor.

It is unlikely that the proposal will lead to differential impact for people based on this protected characteristics.

**Mitigating actions to be taken**

None required.

### **Pregnancy and maternity**

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected

The population of Enfield is increasing, and people are living longer. Despite a previous gradual decline of births between 2015 (5,127 births) and 2019 (4,261 births), the number of births is on the rise again. The population of Enfield is growing older as the number of people aged 65 and over is set to increase by 25% by 2030, whereas the population of 0 – 14-year olds is set to decrease by 13%.<sup>10</sup>

It is unlikely that the proposal will lead to differential impact for people based on this protected characteristic because the policy has no particular impact on pregnancy or maternity.

<sup>10</sup> <https://new.enfield.gov.uk/healthandwellbeing/topics/demography/>

### **Mitigating actions to be taken**

None required.

### **Race**

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected

The Local Area Profile shows that 35.3% of Enfield's population are from a White British background.<sup>11</sup>

In the NatCen report of Gambling Behaviours in Great Britain in 2015, it highlights that gambling participation varied by ethnic group. Two thirds of White or White British adults had gambled in the past 12 months (65%), compared with less than half of minority ethnic adults; 36% of Asian or Asian British respondents, 40% of Black or Black British respondents and 49% of adults in other minority ethnic groups.<sup>12</sup>

In the September 2021 Gambling Related Harms Evidence Review, it states that there is low confidence that race could be considered risk factors for gambling.<sup>13</sup> This is because there were either limitations in the methodology of the research and studies reviewed or insufficient evidence.

It is therefore not anticipated that the proposed Statement of Principles will have a negative effect on the grounds of race.

<sup>11</sup> 2019-based in-house ethnicity estimates.

<sup>12</sup> <https://natcen.ac.uk/media/1464625/gambling-behaviour-in-great-britain-2015.pdf>

<sup>13</sup> <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

#### **Mitigating actions to be taken**

None required.

**Religion and belief**

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

In the September 2021 Gambling Related Harms Evidence Review, it states there is moderate confidence that religion is not one of the risk factors for harmful gambling among children and young people.<sup>14</sup>

It is not anticipated that the proposed Statement of Principles will have a negative effect on the grounds of religion and belief.

<sup>14</sup> <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

**Mitigating actions to be taken**

None required

**Sex**

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

Men are more likely to gamble than women, and this difference is most obvious for online gambling where 15% of men participate, compared to 4% of women. People who are classified as at-risk and problem gamblers are more typically male. The September 2021 Gambling Related Harms Evidence Review, states there is a high degree of confidence that being male was deemed a risk factor for

subsequent harmful gambling among children and young people.<sup>15</sup>

In Enfield, 49% of the population are male.<sup>16</sup>

Operators shall have due regard of the Local Area Profile which will reduce the risk of vulnerable people developing gambling-related problems because through the completion of risk assessments, licensed premises will have an improved understanding and focus on local risks and mitigating gambling-related harm.

This will mean that premises will need to consider the implementation of strategies to mitigate this, for example, increasing staff levels and the requirement of staff training to help staff members spot and assist vulnerable men and women.

The revised Statement of Principles would have a neutral impact on the protected characteristic of sex (gender). The statement of principles seeks to protect both males and females from gambling related harm.

<sup>15</sup> <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

<sup>16</sup> ONS mid-year estimates 2020

#### **Mitigating actions to be taken**

None required.

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<p><b>Sexual Orientation</b></p> <p>This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.</p>
<p>Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people with a particular sexual orientation?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>It is unlikely that the revised Statement of Principles will lead to differential impact for people based on this protected characteristic because the policy has no particular impact on sexual orientation.</p>
<p><b>Mitigating actions to be taken</b></p>
<p>None required</p>

<p><b>Socio-economic deprivation</b></p> <p>This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.</p>
<p>Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people who are socio-economically disadvantaged?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>Deprivation has a significant impact on health and wellbeing. Enfield is deemed to be the 9<sup>th</sup> most deprived borough in London, and 57<sup>th</sup> most deprived Local Authority in England (OMD IMD 2019). There is a clear divide between the east and west wards, and those in the east rank amongst the top 20-30% most deprived wards in England.<sup>17</sup></p>

<sup>17</sup> <https://new.enfield.gov.uk/healthandwellbeing/topics/demography/>

At March 2021, Enfield's Claimant Count was 20,625. This represents the number of Enfield residents claiming unemployment benefits in the form of Job Seekers Allowance or Universal Credit (with a job-seeking conditionality regime). This represents a 67% increase in the number of unemployed adults in the year from March 2020 with the greatest rise occurring between March and May 2020, at the start of the global Covid-19 pandemic. The Claimant Count percentage rate (i.e. the number of unemployed claimants as a percentage of all residents aged 16-64) rose more than threefold from 3.6% to 9.7% in the same period, as is higher than the average rates for both London and England.<sup>18</sup>

The gambling related harms evidence review summary shows that the highest rates of gambling participation are among people who have higher academic qualifications, people who are employed, and among relatively less deprived groups. The socio-demographic profile of gamblers appears to change as gambling risk increases, with harmful gambling associated with people who are unemployed and among people living in more deprived areas. This suggests harmful gambling is related to health inequalities.<sup>19</sup>

The Local Area Profile sets out maps in Figures 7 to 9 of hotspots for areas of deprivation, unemployment and those claiming Universal Credit against locations of gambling premises.

The implementation of the updates to the Local Area Profile will have a positive impact on unemployed people or people suffering in deprivation.

The completion of the risk assessment based on the local area profile by each gambling premises operator will highlight the need for each premises to review their gambling operation, design and layout of the premises and control mechanisms to reduce the risk of people who are considered vulnerable due to being in an area of socio- economic deprivation, being subject to gambling-related harm. This could include training staff to a different level in order to spot and help vulnerable people, designing the premises so that staff don't have obstructed views of gaming machines or entrances and introducing extra CCTV cameras to monitor the activity of patrons, for example.

<sup>18</sup> <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2021-your-council.pdf>

<sup>19</sup> <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

### **Mitigating actions to be taken.**

Measures are stated in the Statement of Principles that will help protect vulnerable people, which includes those disadvantaged due to socio-economic factors.

## SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Enfield has undertaken an eight-week statutory public consultation to obtain the views of local residents and businesses on the proposals made to the Statement of Principles. The responses have been taken into account for the final draft, for example, has removed places of worship from the Local Area Profile as there was no evidence to link this with gambling related harm. The feedback to the consultation will be published. The council keeps the policy statement under constant review. Any reviews that are submitted as a result of enforcement action is overseen by the Licensing Committee.

The EqlA has been prepared by Ellie Green, Principal Licensing Officer, and Sue McDaid, Head of Regulatory Services & Corporate Health and Safety. It has been prepared as part of the policy drafting process prior to approval of the Statement of Principles by Full Council.

The EQIA will be reviewed again in 3 years' time during the next review of the Statement of Principles, or sooner if required.



**SECTION 5 – Action Plan for Mitigating Actions.**

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments