

# **Equality Impact Assessment / Equality Analysis**

**(Version 4)**

<b>Item name</b>	<b>Details</b>
<b>Title of service or policy</b>	Gambling Statement of Principles
<b>Name of directorate and service</b>	Place, Public Protection - Licensing
<b>Name and role of officers completing the EqIA</b>	John Dowding – Public Protection Manager - Licensing
<b>Date of assessment</b>	February 2026

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

## 1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>The Gambling Act 2005 received Royal Assent on the 7th April 2005 and following publication of the first Statement of Principles in January 2007, the Gambling Act commenced from 31st January 2007.</p> <p>The Act gives licensing authorities a number of important functions in relation to gambling. These functions include:</p> <ul style="list-style-type: none"> <li>● licensing premises for gambling activities.</li> <li>● considering notices given for the temporary use of premises for gambling.</li> <li>● granting permits for gaming and gaming machines in clubs and miners' welfare institutes.</li> <li>● regulating gaming and gaming machines in alcohol licensed premises.</li> <li>● granting permits to family entertainment centres for the use of certain lower stake gaming machines.</li> <li>● granting permits for prize gaming.</li> <li>● considering 'occasional use' notices for betting at tracks; and</li> </ul>

	<ul style="list-style-type: none"> <li>• registering small societies' lotteries.</li> </ul> <p>The intended outcome of the document is to ensure that this Authority, in exercising its functions under the Gambling Act 2005, complies with its duty to pursue and wherever appropriate to have regard to the licensing objectives set out in the Gambling Act 2005, and to permit gambling in so far as it is reasonably consistent with the pursuit of the licensing objectives.</p> <p>The licensing objectives are:</p> <ul style="list-style-type: none"> <li>• preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</li> <li>• ensuring that gambling is conducted in a fair and open way protecting children and other vulnerable people from being harmed or exploited by gambling.</li> </ul>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul>	<p>Section 349 of the Gambling Act 2005 requires the Council to consult before publishing its Statement of Principles and to keep it under review. For this edition, the Council completed an 8-week targeted consultation with responsible authorities and relevant stakeholders, focusing on licensees and representative bodies rather than a full public consultation. The statutory consultees were included, alongside those representing gambling businesses and persons likely to be affected.</p> <p>For this review cycle, the required consultation has been completed as an 8-week targeted engagement with responsible authorities and relevant stakeholders and licensees, rather than a borough-wide open public exercise, consistent with section 349(3).</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>There is no perceived conflict with other Council policies. For this edition, the Council completed an 8-week targeted consultation with the statutory consultees and relevant stakeholders (including licensees), in</p>

	<p>accordance with section 349(3) of the Gambling Act 2005 and the Cabinet Office Consultation Principles on targeting and proportionality.</p> <p>A proportionate approach was adopted given the area's small, non-clustered gambling footprint, stable licence numbers and absence of recorded gambling-related complaints since the previous review as evidenced in Licensing records</p> <p>.</p>
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## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<b>2.1</b> What equality focussed training have staff received to enable them to understand the needs of our diverse community?	B&NES Equalities and Diversity Training has been undertaken as well as consultation with the Council's Equality Officer prior to the commencement of this assessment.
<b>2.2</b> What is the equality profile of service users?	The profile of the service users are members of the public and are made up of people who live in, work in, or are visiting B&NES.
<b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	No available data.
<b>2.4</b> What engagement or consultation has been undertaken	A targeted 8-week consultation has been completed prior to publication. It was limited to stakeholders and licensees rather than a full public consultation and included: Elected Members; Town and Parish Councils; licensed gambling operators; holders of Family

<p>as part of this EIA and with whom? What were the results?</p>	<p>Entertainment permits; ABB; BACTA; the Bingo Association; and the Lotteries Council. A summary of responses and any changes made as a result is retained by Licensing. A limited response was received (in line with previous years consultations) two were acknowledging receipt with no further comments and two were procedural enquiries about existing licenses, outside the framework of the consultation, these were responded to by the licensing team.</p>
<p><b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?</p>	<p>Consultation completed: a targeted 8-week stakeholder and licensee consultation has been carried out with the consultees listed in 2.4. Consultation materials were issued directly to consultees (primarily by email) and made available on the B&amp;NES website. Licensing contact details were provided, and alternative formats were available on request. Public notices were used, where appropriate, to signpost the targeted process.</p>

### 3. Assessment of impact: ‘Equality analysis’

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

<p><b>Key questions</b></p>	<p><b>Examples of what the service has done to promote equality</b></p>	<p><b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b></p>
<p><b>3.1 Issues relating to all groups</b> and protected characteristics</p>	<p>The role of the Licensing team includes regulating activity relating to any gambling licence, permit or registration issued, and addressing any allegations of unlicensed activity.</p>	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• The licensing regime includes statutory safeguards protecting children and vulnerable adults.</li> </ul>

	<p>Inspections are carried out at licenced premises to ensure compliance with the Gambling Act and associated regulations/Licence Conditions and Codes of Practice.</p> <p>The Gambling Act 2005 can be found here:  <a href="https://www.legislation.gov.uk/ukpga/2005/19/contents">https://www.legislation.gov.uk/ukpga/2005/19/contents</a></p> <p>The Licence Conditions and Codes of Practice can be found here: <a href="https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp">https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp</a></p> <p>The Gambling Commission’s guidance to licencing authorities can be found here:  <a href="https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities">https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities</a></p> <p>The above legislation, regulations, and guidance contain information regarding the measures which must be taken to meet the licensing objectives. The Licensing team carries out their function by ensuring compliance with these requirements. Some examples are ensuring premises implement self-exclusion schemes for those who experience problem gambling, or ensuring premises take part in test purchasing operations to prevent underage gambling. These are just two examples and full details of the measures taken can be found at the above links, and within the policy itself.</p>	<ul style="list-style-type: none"> <li>• Compliance inspections enforce fair and safe operation.</li> <li>• Consultation routes used in the targeted 8-week stakeholder and licensee process were designed to be accessible (direct email circulation, website availability, and alternative formats on request).</li> </ul> <p>.</p> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Vulnerable groups may be disproportionately affected by gambling harm.</li> <li>• Mitigated through licence conditions, self-exclusion schemes, age verification, staff training and regulatory enforcement.</li> </ul>
<p><b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.</p>	<p>As above</p>	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Licensing expectations support safe premises for all genders.</li> <li>• Males are statistically more</li> </ul>

		<p>at risk of gambling-related harm; safeguards benefit them directly.</p> <ul style="list-style-type: none"> <li>• Women may experience safety concerns in late-night environments; inspections and conditions support safer premises.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• None beyond general vulnerability risks.</li> <li>• Operators must prevent harassment and maintain safe environments.</li> </ul>
<b>3.3 Pregnancy and maternity</b>	As above	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Neutral policy impact; no barriers created.</li> <li>• Consultation access available online, by post, and in accessible formats.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• None identified; general safeguarding applies.</li> </ul>
<b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	As above	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Licensing decisions are applied consistently and</li> </ul>

		<p>without discrimination.</p> <ul style="list-style-type: none"> <li>• Expectations for safe premises protect trans customers.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Risk of discrimination within licensed premises.</li> <li>• Mitigation: operator training, clear customer-interaction expectations, enforcement powers.</li> </ul>
<p><b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>As above</p>	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Alternative formats available for consultation.</li> <li>• Inspections support safe environments, including for those with mental health vulnerabilities.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Cognitive impairments may increase vulnerability to gambling harm.</li> <li>• Mitigation: self-exclusion, staff intervention duties, compliance checks.</li> </ul>

<p><b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups</p>	<p>As above</p>	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Strong protections for children and young people—age checks, machine access restrictions, test purchasing.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Young adults are at higher risk of gambling harm.</li> <li>• Mitigation: compliance inspections, adherence to social-responsibility codes.</li> </ul>
<p><b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups</p>	<p>As above</p>	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• The targeted 8-week consultation (stakeholders and licensees) was designed to be accessible to all groups within scope, with direct circulation and accessible formats on request.</li> <li>• There are no policy features that disadvantage any racial or ethnic group.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Patterns of gambling harm can intersect with</li> </ul>

		<p>socio-economic hardship in some ethnic groups.</p> <ul style="list-style-type: none"> <li>• Mitigation: inclusive accessibility and safeguarding measures.</li> <li>• Risk of discrimination in gambling premises</li> <li>• Mitigation: Premises should apply consistent, objective entry and service policies, ensure staff are trained on equality, and review incident/refusal logs to prevent any discriminatory impact.</li> </ul>
<p><b>3.8 Sexual orientation –</b> identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people</p>	<p>As above</p>	<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Policy is neutral; licensing must be applied equally to LGBTQ+ people.</li> <li>• Safe-premises requirements reduce risks of harassment.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• None specific; general enforcement mitigates discrimination.</li> </ul>

<p><b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?</p>		<p><b>Impact:</b> Neutral. No aspect of the policy treats people differently based on marital or civil status.</p>
<p><b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>		<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Policy is regulatory, not promotional, meaning it does not encourage gambling—important for some faith groups.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Some religious groups may object to gambling.</li> <li>• The 8-week targeted consultation invited views from relevant stakeholders and licensees. Decisions resulting from this policy are based only on statutory licensing objectives.</li> </ul>
<p><b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors</p>		<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Strong safeguards against gambling harm benefit those more likely to experience</li> </ul>

<p>like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b></p>		<p>deprivation, who are statistically at higher risk.</p> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Gambling harm may disproportionately affect lower-income households.</li> <li>• Mitigation: operator responsibility requirements, support for self-exclusion, partnership with national helplines.</li> </ul>
<p><b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities</p>		<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Policy application is uniform across the district, including rural areas.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Rural residents may experience reduced access to consultation.</li> <li>• Mitigation: While this was a targeted 8-week consultation of stakeholders including parish councils and licensees, access considerations were addressed through online</li> </ul>

		availability, direct circulation, postal options where needed, and alternative formats, with no requirement for physical attendance
<p><b>3.13 Armed Forces Community</b> ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>		<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Policy treats Armed Forces personnel, reservists, veterans and families equally.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p> <ul style="list-style-type: none"> <li>• Veterans can be disproportionately affected by addiction-related harms, including gambling.</li> <li>• Mitigation: safeguarding expectations, self-exclusion schemes, enforcement activity.</li> </ul>
<p><b>3.14 Care Experienced</b> *** This working definition is currently under review and therefore subject to change:</p> <p>In B&amp;NES, you are 'care-experienced' if you spent any</p>		<p><b>Positive impacts:</b></p> <ul style="list-style-type: none"> <li>• Policy is neutral and does not restrict access based on care experience.</li> </ul> <p><b>Potential adverse impacts and mitigation:</b></p>

time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.		<ul style="list-style-type: none"> <li>• Care-experienced people may have increased vulnerability to harm.</li> <li>• Mitigation: strong regulatory controls around safeguarding vulnerable persons</li> </ul>
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\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay ‘due regard’ to make sure the Armed Forces Community are not disadvantaged when accessing public services.

\*\*\*The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

#### **4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan**

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

<b>Issues identified</b>	<b>Actions required</b>	<b>Progress milestones</b>	<b>Officer responsible</b>	<b>By when</b>
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Need to maintain oversight of equality considerations in gambling inspections, especially regarding vulnerability	Add equality-related prompts (e.g., safeguarding, accessibility, visibility of support materials, staff awareness) to annual risk-based inspection checklist	Updated prompts embedded into inspection checklist; reviewed in team meeting	Public Protection Officer – Licensing/Team Review	Immediate
Evidence base for future EqIA cycles needs regular refresh despite low local gambling footprint	Undertake light-touch annual review of any emerging Local Public Health or national gambling-harm indicators to ensure no new equality impacts arise	Short note logged annually summarising any new data or confirming stability	Licensing Manager	Annually
Ensuring equitable access to consultation and policy information for stakeholders	Maintain availability of alternative formats on request; continue use of digital channels and direct circulation routes during future revisions	Accessibility notice/template updated; staff reminded of available formats	Public Protection Officer-Licensing	Ongoing
Transparent evidence trail for stakeholder consultation	Maintain a concise record of consultation replies and responses; file with policy records and provide to Members & relevant committees as required.	Records saved with policy documents; future review cycles to adopt same approach and reference and retain.	Public Protection Officer - Licensing	Ongoing

## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:** Chris Major

(Divisional Director or nominated senior officer)

**Date:** 4<sup>th</sup> February 2026