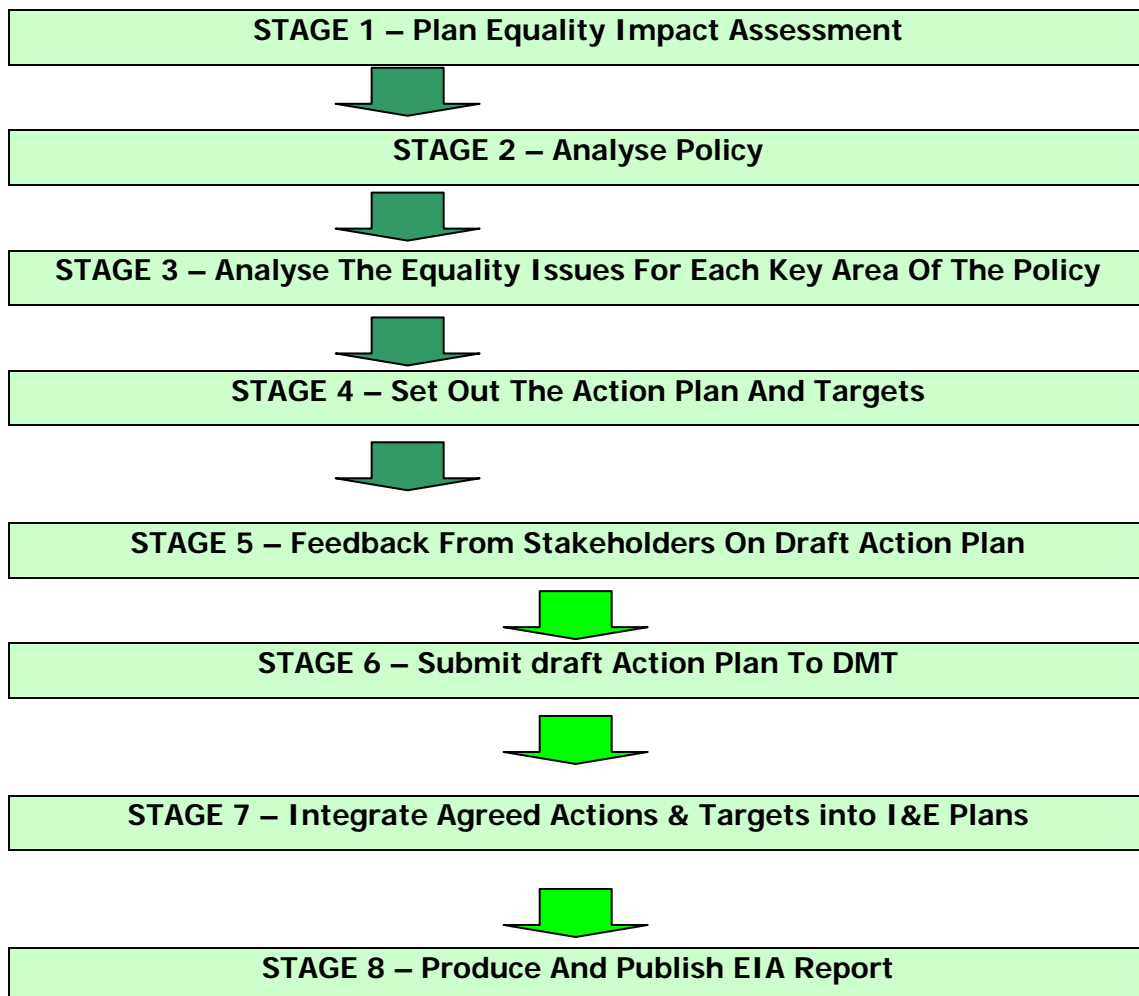


Equality Impact Assessment For Gambling Policy



Human Resources Strategic Services
Chief Executive's Department

July 2007

STAGE 1 – PLAN EQUALITY IMPACT ASSESSMENT

1a. Title of the EIA:

Gambling Policy 2007 - 2010

1b. What category of EIA is this? Please tick one of the following:

Part of planned work	<input type="checkbox"/>
Developing new policies	<input type="checkbox"/>
Changing/ updating existing policies	<input checked="" type="checkbox"/>

1c. Timetable for assessment:

Start Date	20 th December 2007
Projected end date	31 st March 2008

1d. Who will do the EIA? Please complete the following table:

Name	Job Title	Roles & Responsibilities within EIA Team
C.K.Davison	Head of Commercial services	EIA Project Leader
P.Lehane	Food Safety, Occupational Health & Licensing Manager	Manager of Gambling Enforcement Team responsible for the implementation of all EIA recommendations
L.Grasty	Environmental Health Officer	Enforcement Officer specialising in Gambling legislation and associated consultation and procedure development activities
Andy Waddington	Police Constable Bromley Police Licensing unit	Partner Organisation input

1e. Identify any other resources that are needed to support EIA:

Sufficient training, equipment and printing/stationery budgets for consultation and objection handling process.

STAGE 2 – ANALYSE THE POLICY

2a. Briefly describe the aim of the policy:

Licensing authorities are required by the Gambling Act 2005 to publish a statement of the principles that they propose to apply when exercising their functions under the above legislation. The statement must be published at least every three years. The statement must also be reviewed from “time to time” and any amended parts re-consulted upon before publication.

2b. Set out the policy objectives:

The objective of Bromley’s Gambling Policy is to inform interested parties of the principles that it proposes to apply when exercising its functions under the Gambling Act 2005. Bromley licensing authority must have regard to the licensing objectives as set out in section 1 of the Act i.e.

- 1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime**
- 2. Ensuring that gambling is conducted in a fair and open way**
- 3. Protecting children and other vulnerable persons from being harmed or exploited by gambling**

2c. Break down the policy into its key areas:

Part A

Consultation on the policy

Making representations regarding an application

Part B

Premises Licences and other Licensed Gambling Establishments (e.g. Adult Gaming Centres)

Making decisions about licence applications

Permits, Temporary & Occasional Use Notices

2d. List the intended recipients of the policy:

Direct recipients of the policy are:

Operators/Managers of all premises with AWP Machines (i.e. Public Houses and Clubs) in Bromley

Operators/Managers of all licensed Betting Offices in Bromley

Operators/Managers of all licensed bingo halls in Bromley

Operators/Managers of all registered Society Lotteries in Bromley

Members of Licensing Sub Committee

Indirect recipients of the policy are all residents of Bromley and those who visit Bromley to use the above premises

2e. Identify partner organizations and any other departments involved in delivering the policy:

The Gambling Commission

The Metropolitan Police: Bromley Police Station

The London Fire Brigade

Planning Department of the London Borough of Bromley

Public Health Complaints Team

London Borough of Bromley Child Protection Team known as Bromley Safeguarding Children Board

HM Commissioners of Customs and Excise

2f Identify and list any stakeholders concerned with the delivery of the policy:

The Metropolitan Police – Bromley Police Station
 The Director for Children’s Services
 All known premises with AWP Machines, operators of licensed Betting Offices, licensed bingo halls and registered Society Lotteries
 Ward Councillors

STAGE 3 – ANALYSE THE EQUALITY ISSUES OF THE KEY AREAS OF THE POLICY

Category:	Age	Disability	Gender	Race	Religion/ Belief	Sexual Orientation
Considered in EIA?	X				X	

KEY AREAS:	ALL ASSOCIATED DOCUMENTS: For example: statements, forms, supporting policies etc.	EQUALITIES GAP ANALYSIS :
<p>Part A Consultation on the Gambling policy and making representations regarding a Licence application</p>	<p>Gambling Licensing Objectives as outlined in the Gambling Act 2005 and associated statutory instruments</p> <p>Codes of practice issued by the Gambling Commission</p> <p>Codes of practice issued by the Department of Culture Media & Sport</p> <p>Bromley’s Gambling Policy Statement</p> <p>Licence Application forms and guidance produced by the Department of Culture Media & Sport</p> <p>Records of statements received through the consultation process</p> <p>Records of representations made</p>	<p>AGE References to age are made throughout all documents i.e. Protecting children from being harmed or exploited by gambling is a key Licensing objective enshrined in the legislation.</p> <p>Bromley’s Gambling policy clearly restates the Gambling Commission’s Guidance that this objective means preventing children from taking part in gambling (as well as the restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). Objections to a Licence application based on this key objective are treated as a valid objection.</p> <p>The list of persons this authority consults on the Gambling policy includes the Director for Children’s Services.</p> <p>EIA Gap - No Gap.</p> <p>RELIGION/BELIEF This category is referred to in the associated documents i.e.:</p> <p>a) the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory</p>

		<p>requirements of the Gambling Act 2005.</p> <p>b) making a representation or objection to a licence application by an 'Interested Person'. This definition includes someone having a business interest that might be affected. The Gambling Commission's Guidance is that having a business interests should include charities and faith groups.</p> <p>c) Moral objections are not a valid reason to reject applications for premises licence.</p> <p>EIA Gap – No Gap</p>
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Category:	Age	Disability	Gender	Race	Religion/ Belief	Sexual Orientation
Considered in EIA?	X				X	

KEY AREAS:	QUANTITATIVE DATA: For example: monitoring information, census data, performance indicators, Borough benchmark data, customer surveys	EQUALITIES GAP ANALYSIS :
<p>Part A Consultation on the Gambling policy and making representations regarding a Licence application</p> <p>Part B Making decisions about licence applications were representations and objections have been made</p>	<p>CAPS Uniform database (specialist Licensing database) containing all details of licence applications, enforcement inspections and other performance data.</p> <p>Licensing Filing System:</p> <p>a) Hard copies of representations and objections, reports to Licensing sub committee, decision taken by committee etc.</p> <p>b) Soft copies of above where available in team word folders</p> <p>c) Feedback documents from consultation exercise</p>	<p>AGE/RELIGION/BELIEF</p> <p>Gambling Policy consultation. This authority currently follows Government guidance and consults all Councillors, the Metropolitan Police, the Director for Children's Services, all known premises with AWP Machines and known operators of Betting Offices, Bingo Halls and registered Society Lotteries, all known Residents Associations and other adjoining Councils.</p> <p>EIA Gap – No direct consultation with Faith Groups</p> <p>Action – to include Faith Groups in next policy consultation exercise.</p> <p>With regards to the publication and distribution of information relating to proposed Licence applications, this authority complies with the minimum requirements.</p> <p>EIA Gap – No publication of licence application on Web-site. No postal information relating to</p>

		<p>application sent to neighbouring premises (e.g. schools and faith groups). Anonymity of objector not guaranteed.</p> <p>Action – to publish Licence applications on Bromley’s web-site.</p> <p>Action – to contact neighbouring premises (including schools and faith groups etc.) by post informing them of application details.</p> <p>Action – offer anonymity to objector when submitting details of objection to Licensing sub-committee.</p>
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Category:	Age	Disability	Gender	Race	Religion/ Belief	Sexual Orientation
Considered in EIA?	X				X	

KEY AREAS:	QUALITATIVE DATA: For example: customer opinion surveys, staff forums, focus groups, “Getting it Right” feedback	EQUALITIES GAP ANALYSIS :
<p>Part A Consultation on the Gambling policy and making representations regarding a Licence application</p>	<p>Customer complaints, compliments and surveys (located with quality representative – ISO 9000 documentation)</p>	<p>EIA Gap – No Gap</p>

Category:	Age	Disability	Gender	Race	Religion/ Belief	Sexual Orientation
Considered in EIA?	X				X	

KEY AREAS:	ALL ASSOCIATED DOCUMENTS: For example: statements, forms, supporting policies etc	EQUALITIES GAP ANALYSIS :
Part B Making decisions about licence applications where representations and objections have been made	Gambling Licensing Objectives as outlined in the Gambling Act 2005 and associated statutory instruments Codes of practice issued by the Gambling Commission Codes of practice issued by the Department of Culture Media & Sport Bromley's Gambling Policy Statement Licence Application forms and guidance produced by the Department of Culture Media & Sport Records of statements received through the consultation process Records of representations made	EIA Gap - No Gap. .

Category:	Age	Disability	Gender	Race	Religion/ Belief	Sexual Orientation
Considered in EIA?	X				X	

KEY AREAS:	QUANTITATIVE DATA: For example: monitoring information, census data, performance indicators, Borough benchmark data, customer surveys	EQUALITIES GAP ANALYSIS :
Part B Making decisions about licence applications where representations and objections have been made	CAPS Uniform database (specialist Licensing database) containing all details of licence applications, enforcement inspections and other performance data. Licensing Filing System: d) Hard copies of representations and objections, reports to Licensing sub committee, decision taken by committee etc. e) Soft copies of above where available in team word folders f) Feedback documents from consultation exercise	AGE/RELIGION/BELIEF Reports to the Licensing Sub-committee by Licensing officers include details of application together with copies of all relevant representations and objections received from the consultation exercise. EIA Gap – With the current report format Members may have a limited understanding of the area where the premises subject to a licence application is situated (i.e. proximity of schools, churches, mosques etc.) Action – to improve the

		information included in the reports to the Licensing Sub Committees by including colour photographs and other information relating to the nature of premises in the vicinity (e.g. schools, youth centres, churches, mosques etc.).
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Category:	Age	Disability	Gender	Race	Religion/ Belief	Sexual Orientation
Considered in EIA?	X				X	

KEY AREAS:	QUALITATIVE DATA: For example: customer opinion surveys, staff forums, focus groups, "Getting it Right" feedback	EQUALITIES GAP ANALYSIS :
Part B Making decisions about licence applications where representations and objections have been made	Customer complaints, compliments and surveys (located with quality representative – ISO 9000 documentation)	EIA Gap – No Gap

STAGE 4 – SET OUT THE ACTION PLAN AND TARGETS

the equality action plan must be integrated into the performance centre improvement & efficiency plans/ service plans.

KEY AREA	EQUALITY CATEGORY	PROPOSED ACTION/TARGETS	KEY MILE STONES/TIMESCALE	WHO IS RESPONSIBLE?	RESOURCES & TRAINING REQUIRED?
Consultation on the Gambling policy and making representations regarding a Licence application	AGE RELIGION/BELIEF	To include Faith Groups in next policy consultation exercise	Next consultation exercise on the Gambling Policy is due 2009	C.Davison (PCM)	Minimal postage printing/stationery budget to cover extended consultation proposal
As above	AGE RELIGION/BELIEF	To publish Licence applications on Bromley's web-site.	May 08	P.Lehane, Licensing Manager	Bromley Knowledge/IT support may be required in order to overcome technical difficulties
As above	AGE RELIGION/BELIEF	To contact neighbouring premises (including schools and faith groups etc.) by post informing them of application details	April 08	P.Lehane Licensing Manager. Licensing Administration Team	Additional Administration time and postage required for each new application. Demand on Administration support will need to be monitored as additional support may be required.
As above	AGE RELIGION/BELIEF	Offer anonymity to objector when submitting details of objection to Licensing sub-committee	February 08	P.Lehane Licensing Manager. Licensing Team	None

<p>Making decisions about licence applications where representations and objections have been made</p>	<p>AGE RELIGION/BELIEF</p>	<p>Action – to improve the information included in the reports to the Licensing Sub Committees by including colour photographs and other information relating to the nature of premises in the vicinity (e.g. schools, youth centres, churches, mosques etc.)</p>	<p>April 08</p>	<p>P.Lehane Licensing manager Licensing Team</p>	<p>Digital Cameras to be purchased. C.Davison (PCM) to authorise. Use of existing budgets.</p>
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STAGE 5 – Feedback From Stakeholders On Draft Action Plan

Stakeholder	Date consulted	Feedback	Impact on Action Plan
Departmental Equality Group			
Metropolitan Police			

STAGE 6 – Submit Draft Action Plan To DMT

Date submitted:	
Feedback:	
Changes made: (If required)	

STAGE 7 – Integrate Agreed Actions & Targets Into I&E Plans

Date complete:	
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STAGE 8 – Produce And Publish EIA Report

Date published:	
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