



## Cabinet

**Tuesday 12 November 2024 at 10.00 am**  
Conference Hall - Brent Civic Centre, Engineers Way,  
Wembley, HA9 0FJ

### **Agenda Item 11: Statement of Gambling Principles – Background Papers**

Attached are the following two documents referenced as background papers in the above item on the main Cabinet agenda:

- Gambling Principles Consultation responses
- Equality Assessment

These documents have been published as a separate supplementary pack to accompany the main Cabinet agenda.



## GAMBLING CONSULTATION RESPONSES

Date Received	Agency/ Respondent	Method of response	Summary of Response to Consultation	Action Taken
17 September 2024	Betting and Gaming Council – Point 1	Written	Section 5.2. figures omit that 0.3% of the adult population engage in problem gambling is omitted from these figures. Instead, the statement of principles states that 2.8% of adults were identified as at-risk or problem gamblers. The authority appears therefore to be overstating the issue which can only be pejorative as far as applicants are concerned. There is no place or justification for these figures in a local statement of principles and these figures should therefore be omitted.	Added a sentence regarding 0.3% the adult population engage in problem gambling.
	Betting and Gaming Council – Point 2	Written	Estimated costs of harm associated with gambling in England” contained within the table in paragraph 5.3.4 should be deleted along with the text of the paragraph. None of this information is relevant in the context of the licensing authority’s duty to aim to permit gambling premises in Brent.	Noted but no policy revision required.  The intention of this paragraph is to highlight the impact on the harm associated with gambling in England, and has been incorporated as the Health and Wellbeing Brent Council asked this to be included last year
	Betting and Gaming Council – Point 3	Written	Paragraphs 7.1 to 7.5.9 explain the council's approach to premises licence conditions. This section would be assisted by the insertion of a clear statement that the mandatory and default conditions are intended to be, and usually are, sufficient to ensure consistency with the licensing	Inclusion of paragraph suggested.

			<p>objectives and that additional conditions will only be considered where there is clear evidence of a risk to the licensing objectives which is not adequately addressed by the applicant's local risk assessment.</p>	
	<p>Betting and Gaming Council – Point 4</p>	<p>Written</p>	<p>Paragraph 7.1.7 should be deleted as this demonstrates a fundamental misunderstanding of the requirements of Gambling Act 2005 applications. This states that, "Applicants shall offer conditions to the Licensing Authority as part of their application."</p> <p>Unlike Licensing Act 2003 applications where an applicant is required to indicate the steps to be taken to promote the licensing objectives with these steps then being converted into premises licence conditions, there is no such requirement under Gambling Act 2005 applications as the mandatory and default conditions coupled with the local risk assessment will detail how the premises will operate consistently with the licensing objectives. The risk assessment will outline local risks and the policies, procedures and measures to be implemented to ensure consistency with the licensing objectives. There is no anticipation that these</p>	<p>Wording will be changed to reflect this to "Applicants may offer....".</p>

			measures etc will then be “converted” into conditions.	
	Betting and Gaming Council – Point 5	Written	The “menu” of proposed conditions in paragraph 7.2 to 7.5 should be deleted. Issues such as staff training, the recording of refusals are issues for the Gambling Commission through the LCCP and Operating Licence. These are not matters for the Licensing Authority.	Noted but no policy revision required.  This section pertains to the conditions that operators may offer during the application process.
7 August 2024	GamCare – Point 1	Written	We welcome the position Brent Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles.	Noted but no policy revision required.
	GamCare – Point 2	Written	Local authorities can play a greater role in reducing gambling harm, particularly for those of our clients who experience harm in land-based gambling venues, due to council’s licensing responsibilities.	Noted but no policy revision required.
	GamCare – Point 3	Written	It is vital that Brent Council develops a local picture of the level of gambling harms, in order to best target resources and tailor service provision. This could be achieved by gathering data from the National Gambling Helpline, as well as those already providing services in the area.	Noted but no policy revision required. Brent Public Health are currently drafting a Gambling Needs Assessment.
	GamCare – Point 4	Written	Building on the proactive approach the council is already taking, we would like to see Brent Council commit in its statement of principles to a public health approach to gambling.	Noted but no policy revision required. Brent Public Health are currently drafting a Gambling Needs Assessment.

	GamCare – Point 5	Written	This commitment should include training frontline and primary care staff to recognise the signs of gambling harm and develop referral pathways to the National Gambling Helpline or local treatment providers. GamCare has worked with Haringey Council to implement a similar system, that has received widespread support.	Noted but no policy revision required.
	GamCare – Point 6	Written	In the absence of Cumulative Impact Assessments as a method by which the “aim to permit” approach can be challenged, Brent Council should continue to pursue a <a href="#">Local Area Profile</a> approach that specifically analyses gambling risk, and use this data as a basis from which to scrutinise and possibly oppose a licensing application.	Noted but no policy revision required. Decision makers are required to determine each gambling application on its individual merits and the draft policy enables the licensing authority to do this.
	GamCare – Point 7	Written	The changes to Brent Council’s statement of principles should be viewed in the context of the Gambling Act Review and subsequent process of white paper consultations, so take account of the rapidly changing regulatory environment.	Noted but no policy revision required. Reviews of the Council’s statement of principles will takes place, when revisions of legislation or changes to codes of practices occur.
30 September 2024	Brent Environmental nuisance team	Written	Our Nuisance Control data does not contain any information against either statutory nuisance or public nuisance necessitating our concern or input into this revision.	Noted but no policy revision required.
6 August 2024	Hough and Bollard	Written	Thank you I have no comments to make.	Noted but no policy revision required.

2 September 2024	Luxury Leisure – point 1	Written	Para 4.5.4 We note the suggestion that accessing gambling facilities late at night is a “potential indicator of gambling harms”. However, as leisure venues with a purely adult customer base, AGCs are part of the night time economy and cater to a wide variety of adults, such as those finishing night shifts, those in the hospitality trade and taxi and bus drivers. The suggestion that just because those customers play at night there is a potential indicator of harm, is, we believe, misplaced and suggest that the wording is amended.	Wording amended to take into account variety of different users.
	Luxury Leisure – point 2	Written	Para 6.11.2 With respect, it is not correct that an applicant “should” make an application for a provisional statement in the circumstances described – although they “may” do so. We refer to the 2008 case of R (on the application of Betting Shop Services Limited) –V– Southend on Sea Borough Council, in which it was held that an applicant could apply for a premises licence (without the need for a provisional statement) even though the premises were not fully constructed – the applicant is not restricted to making an application for a provisional statement. It was held by the court that the then current Guidance issued by the Commission was wrong. The Guidance was subsequently amended. As such, we suggest that the wording of these	This section will be amended to reflect the change and the amended guidance.

			paras be amended to make it clear that applications for premises licences can be made regardless of whether the building in question is complete or finished or needs to be altered. An applicant may apply for a provisional statement if the building is not complete, but it does not have to do so and can instead apply for licence.	
	Luxury Leisure – point 3	Written	Para 6.13.1 On the same theme as at 2 above, we think it more accurate for the first sentence to read” When dealing with a premises licence application for <b>any</b> building....” - not simply “ <b>finished</b> buildings”.	Change made to reflect this.
	Luxury Leisure – point 4	Written	Para 7.1.7 We do not think it correct for the Statement to presuppose that in every case conditions must be offered by applicants (“Applicants <b>shall</b> offer....”). There are many mandatory and default conditions and it will not always be the case that further conditions are necessary or required.	Noted but no policy revision required.  Wording of paragraph changed from “shall” to “may”.
6 September 2024	Resident 1-Harlesden	Online	More emphasis should be given to protecting vulnerable residents	Noted but no policy revision required.  A number of revisions have been made to the policy regarding the protection of vulnerable people. To make further changes, it would be useful to have specific details/ examples of what could be implemented to better protect vulnerable people.
	Resident 1-Harlesden	Online	There are too many gambling establishments in Harlesden and these are a source of crime and disorder	Noted but no policy revision required.  As mentioned in other parts of this report, the policy cannot decrease the number of gambling establishments.



	Resident 1-Harlesden	Online	The policy leaves too much temptation on the streets for those who are struggling with a gambling problem.	Noted but no policy revision required.
	Resident 1-Harlesden	Online	No, I believe the voices of residents often go unheard.	Noted but no policy revision required.  All interested parties can objective or review a gambling licence, but objections or reviews are only valid if the reasons demonstrate that the licensing objectives are not being, or are unlikely to be, met.
7 September 2024	Resident 2-Kilburn	Online	The fact that local authorities are extremely constrained by central government regulations when it comes to allowing these socially damaging "local businesses" onto their high streets reflects the influence of the gambling industry at Westminster, particularly in the Conservative party. Lobbying for a change in these iniquitous rules ought to be a priority for the new administration.	Noted but no policy revision required.  The Council have written to Minister requesting changes to the Act to include 'Cumulative Impact assessments'.
	Resident 2-Kilburn	Online	Without a change in the regulations, Brent's policy is as strong as it can be but their hands are unacceptably tied.	Noted but no policy revision required.
	Resident 2-Kilburn	Online	It's a problem that needs addressing but with the police as stretched as they are, again local authority policy is necessarily a secondary consideration	Noted but no policy revision required.
7 September 2024	Resident 3-Roundwood	Online	There are far too many gambling shops on the Harlesden High Road and they have become a magnet for alcohol and drug addicts who hang around outside for hours, often acting in a very anti-social way. It drives shoppers from the High Road as it's	Noted but no policy revision required.  The Council have written to Minister requesting changes to the Act to include 'Cumulative Impact assessments'.

			not a nice place to be. The policy needs to address this and the council needs to lobby central government so that they have the power to veto gambling shops from opening and make positive choices for the shops that are allowed to open on the High Street.	
	Resident 3-Roundwood	Online	The policy does not give the council the power to turn down applications from gambling companies and thereby make positive choices for Harlesden and the High Street. The High Street is becoming a no go area because of the number of gambling shops and the people who congregate outside.	Noted but no policy revision required.
	Resident 3-Roundwood	Online	The policy clearly does not address protecting gambling addicts, young people or the ordinary people who are affected by the anti-social behaviour of the gambling shop customers.	Noted but no policy revision required.  There has been an increased emphasis on ensuring that operators are responsive to crime and disorder issues related to their premises within the policy.
	Resident 3-Roundwood	Online	What is on place is clearly not working as there are many people on the high street who are addicts and display anti-social behaviour. It's scary for children and adults alike, to be around that and we avoid the High Street because of this. We prefer to spend our money elsewhere as it is not a nice experience to be on the High Street.	Noted but no policy revision required.  There has been an increased emphasis on ensuring that operators are responsive to crime and disorder issues related to their premises within the policy.
9 September 2024	Resident 4-Craven Park	Online	It doesn't because it does not consider school superzones, deprivation, or plans to improve the vitality of certain areas.	Noted but no policy revision required.  The Local Area Profile takes deprivation into consideration and considers it within the policy. If an area is already

				<p>facing high deprivation, any application would be evaluated based on its own merit and any risks posed to the Licensing Objectives.</p> <p>Several consultation responses have emphasised the need for a local strategy to tackle gambling-related harms. This has emerged as a theme in the consultation process.</p> <p>Unfortunately, there are limited opportunities to make amendments to the policy, based on this aspect, currently.</p>
	Resident 4-Craven Park	Online	It needs to be based on data collected in the last 10 years	Noted but no policy revision required.
	Resident 4-Craven Park	Online	It needs to be reinforced, considering child protection and safeguarding children law.	Noted but no policy revision required.
	Resident 4-Craven Park	Online	Businesses must have a certain kind of responsibility in preventing crime and disorder relating to ASB.	<p>Noted but no policy revision required.</p> <p>Greater focus has been placed on ensuring that operators are responsive to issues of crime and disorder related to their premises.</p>
25 September 2024	Resident 5-Craven Park	Online	Honestly, gambling businesses will not help the area to thrive. It causes financial, and mental health problems and contributes to anti-social, hostile and unsafe behaviour in the area - which has a personal and financial cost to residents, the council, but not least, the people who use these gambling businesses. They might not be illegal. But they are immoral. You only need to see who uses these businesses and loiters outside them to see that these people are vulnerable or in need of some kind of help - and by removing and restricting	<p>Noted but no policy revision required.</p> <p>This issue has been raised throughout the consultation process and engagement exercises. Further clarification has been added regarding operator responsibilities in recognising and mitigating the risks of crime associated with gambling premises.</p>

			gambling businesses this would go a long way.	
	Resident 5-Craven Park	Online	<p>The policy does not really address these points. For example, it mentions the concept of "designing out" crime and the importance of adequate supervision, but it does not provide specific examples of how these could be or have been achieved anywhere else. If there are no standards or guidelines on how these things should be achieved, then how are the proprietors of these businesses ever going to be held to account? Surely the council is not happy with the anti-social behaviour that gambling already causes in the borough, and there has been no instances of designing out the problems caused by gambling, so how is anyone - the business owners, local residents, council enforcement - able to uphold any kind of sanction when there is no guidance.</p> <p>Also, there is a lot of 'should' in this document, but not a lot of 'must'. If a business 'should' do something, then that gives them an opportunity to not do it - 'should' is not mandatory. By stating that they 'must' do things, then that holds them to the principles you are laying down. Without saying that, these policy documents and the findings of these consultations are useless as businesses can ignore them. Residents 'must' pay their</p>	<p>Noted but no policy revision required.</p> <p>This issue has been raised throughout the consultation process and engagement exercises. Further clarification has been added regarding operator responsibilities in recognising and mitigating the risks of crime associated with gambling premises.</p> <p>'Should' is a legal term which means must.</p>

			council tax, we don't have the luxury of deciding whether we 'should' pay it or not - why do businesses get leeway to decide which council rules they should follow?	
	Resident 5-Craven Park	Online	<p>Not really? Can gambling ever be fair? Gambling businesses don't make a loss, so it would appear that they are always the winner - is that fair?</p> <p>They base their high street branches in areas like Harlesden and Kilburn and Wembley instead of Chelsea and Kensal Green and Hampstead - is it fair to residents of the former areas that they target them for gambling? What do the demographics of those areas have in common?</p>	Noted but no policy revision required.
	Resident 5-Craven Park	Online	<p>I don't have enough views on this but it's obvious that children shouldn't be tempted to gamble and having the volume of these premises around Harlesden, where there are plenty of children around school times and it is metres away from several different schools means that the prospect of gambling is always going to be in their faces.</p> <p>As goes the vulnerable people point, I reiterate - you only need to look at the people who are standing around in the vicinity of these premises in Harlesden on any day of the week - there are heavy drinkers, drug abusers, people who are obviously in</p>	<p>Noted but no policy revision required.</p> <p>Greater focus has been placed on ensuring that operators are responsive to issues of crime and disorder related to their premises.</p>

			financial distress, the mentally ill, people who are lost and lonely... these premises are hubs and meeting points for these people and that surely cannot be good or healthy.	
	Resident 5-Craven Park	Online	The potential measures that licensees could take to address issues related to street drinking that are mentioned in the document are all in place, so what is the point of including these? Aren't these already conditions of running a gambling business?	Noted but no policy revision required.
	Resident 5-Craven Park	Online	I hope I've already said enough about this in earlier answers to impress on you the fact that these proposals will make no difference to anti-social behaviour in the borough, will provide no responsibility on the part of the business owners to enforce or even take any care or interest about whether this is a problem or not, and many if not all of the things highlighted in the consultation are already in place or exist, so I cannot see how the proposals are meant to be an improvement because they are not. They just confirm business as usual without addressing current issues with the anti-social behaviour that arises from existing gambling establishments.	Noted but no policy revision required.  This issue has been raised throughout the consultation process and engagement exercises. Further clarification has been added regarding operator responsibilities in recognising and mitigating the risks of crime associated with gambling premises.
26 September 2024	Resident 6-Harlesden	Online	There is a gambling centre in Harlesden and they just approved more? Its shocking that the area has allowed multiple casinos to open. They take advantage of vulnerable	Noted but no policy revision required.  The Gambling Act 2005 places a legal duty on the Licensing Authority to aim to permit gambling in so far as it

			gambling addicts and nothing to the area except bring it down.	is considered to be reasonably consistent with the pursuit of the licensing objectives. The Licensing Authority is unable to refuse applications for gambling premises or close premises solely because there are already too many premises, or they are not wanted by the community. We must consider each case on its individual merits.
	Resident 6-Harlesden	Online	Not enough is being done to prevent more gambling businesses opening in deprived communities. Clearly its not working when there were multiple protests and yet they are still opening multiple new gambling centers in Harlesden. One is right next to a school?? How can this be allowed?	Noted but no policy revision required.  The Local Area Plan identifies the placement of schools, which gambling operators should consider when conducting their Local Area Risk Assessment. In areas where children are particularly vulnerable, the impact on the licensing objective of protecting children from harm would determine whether a new application is granted and if it aligns with the licensing objectives.
	Resident 6-Harlesden	Online	There is a new gambling center in Harlesden being built right next to a school. I really don't understand how policy has allowed this. i cant think of a less suitable location. It's right next to a school.	Noted but no policy revision required.  The Local Area Plan identifies the placement of schools, which gambling operators should consider when conducting their Local Area Risk Assessment. In areas where children are particularly vulnerable, the impact on the licensing objective of protecting children from harm would determine whether a new application is granted and if it aligns with the licensing objectives.
	Resident 6-Harlesden	Online	The amount of street drinking in Harlesden is wild. Around the town clock which should be a high profile area in the town there are groups of homeless drinkers always there begging and giving the area an unwelcoming, messy and intimidating environment.	Noted but no policy revision required.  Greater focus has been placed on ensuring that operators are responsive to issues of crime and disorder related to their premises.
	Resident 6-Harlesden	Online	Heard a while ago about a regeneration project on harlesden plaza - but it doesn't look like its	Noted but no policy revision required.

			happening. the area is just begging for investment and its bizarre that with such high housing prices that the area is being left behind, growing run down and forgotten.	
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## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	<b>Statement of Gambling Principles</b>
<b>DEPARTMENT:</b>	<b>Neighbourhoods and Environment</b>
<b>TEAM:</b>	<b>Licensing Team/ Regulatory Services</b>
<b>LEAD OFFICER:</b>	<b>Anu Prashar</b>
<b>DATE:</b>	<b>11 October 2024</b>

*NB: Please ensure you have read the accompanying EA guidance and instructions in full.*

### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Brent Council is the licensing authority under the Gambling Act 2005 (the Act) and is responsible for granting premises licences for gambling in the Borough. The Act created the Gambling Commission as a national regulatory body to enforce stronger gambling regulations. S.349 of the Act requires the council to publish a statement of the principles that it proposes to apply when exercising its functions under the Act. This statement must be published every three years. The statement must be reviewed from time to time and if the council thinks it necessary in the light of a review, revise the statement and publish any revision of it before it comes into effect.

The council is required to consult widely on the statement and any revision of it. The Statement was last revised in January 2024 after the policy was extended by Full Council in November 2022 for two years. To bring the policy in line with the Gambling Commission review timetable this policy will be reviewed again but in a light way. Brent Council has reviewed its Statement of Principles and undertaken a public consultation exercise in order that the latest version can be agreed by the Full Council in November 2024 and published in January 2025.

Consultees included the chief officer of police, one or more persons representing the interests of persons carrying on gambling businesses in the authority's area, and one or more persons representing the interests of persons who are likely to be affected by the exercise of the authority's functions under the Act.

Activities covered by legislation and this policy include:

- (a) The licensing of premises where gambling activities are to take place by issuing *Premises Licences*

- (b) Issue *Provisional Statements*
- (c) Regulate *members' clubs* and *miners' welfare institutes* who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
- (d) Issue *Club Machine Permits* to *Commercial Clubs*
- (e) Grant permits for the use of certain lower stake gaming machines at *unlicensed Family Entertainment Centres*
- (f) Receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
- (g) Issue *Licensed Premises Gaming Machine Permits* for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines
- (h) Register *small society lotteries* below prescribed thresholds
- (i) Issue *Prize Gaming Permits*
- (j) Receive and Endorse *Temporary Use Notices*
- (k) Receive *Occasional Use Notices*
- (l) Provide information to the Gambling Commission regarding details of licences issued (see section above on 'information exchange')
- (m) Maintain registers of the permits and licences that are issued under these functions

The council exercises its powers of compliance and enforcement under the Act in partnership with the Gambling Commission and other relevant responsible authorities

The existing policy sets out the general approach the council will take when considering applications for licences. The Act provides a clear focus on the three licensing objectives which are:

- (a) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (b) Ensuring that gambling is conducted in a fair and open way;
- (c) Protecting children and other vulnerable persons from being harmed or exploited by gambling

This draft Statement of Gambling Principles has been updated using the Gambling Act 2005 which remains unchanged together with the latest guidance issued by the Gambling Commission to local authorities.

Gambling operators are required to produce robust risk assessments using local area profiles to minimise gambling related harm. Local Area Profiles such as deprivation index, unemployment, hostels, housing, pay day loan shops, schools etc. for Brent have been introduced which includes interactive maps for gambling operators to use in order to produce their risk assessments.

Where areas are identified as posing a significant risk of gambling related harm to individuals but especially to children and vulnerable adults, any new operator will be asked to consider relocating their premises to a more suitable location. Examples of such areas include

Wembley High Road, Harlesden High Street, Kilburn High Road etc., which have high footfall as well as those near supported accommodation, addiction treatment centres. This is not an exhaustive list as other factors also affect gambling related harm.

2. Who may be affected by this policy or proposal?

The Statement will affect all residents, businesses and visitors to the Borough who may be affected by premises- based gambling activity.

The Statement will be used by the council to regulate gambling activity within its responsibility, and it aims to balance the needs of all stakeholders to ensure gambling is lawful and the activity is safe.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The council recognises that many people enjoy gambling as part of their entertainment, leisure and sporting activities from which economic and social benefits arise for businesses. Appropriately licensed and regulated gambling should help to exclude illegal gambling. Gambling creates employment in the borough, but it also presents risks to children, vulnerable adults, existing problem gamblers, and in certain circumstances being the cause of crime and disorder.

Most of the gambling establishments are owned by large businesses. There are very few owned by people from the disadvantaged groups, although they account for a large proportion of users. We will continue to monitor gambling operations to detect any adverse effect on these groups.

Brent Council in its role as licensing authority recognises the importance of its decision making process, the input of all stakeholders, and the application of this Statement of Principles in relation to the Gambling Policy to deal with the competing interests of business and local communities. The council will therefore seek to strike a balance between the different aspirations and requirements of businesses, local residents and the many visitors to the borough.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age		X	

Sex		<b>X</b>	
Race		<b>X</b>	
Disability *		<b>X</b>	
Sexual orientation		<b>X</b>	
Gender reassignment		<b>X</b>	
Religion or belief		<b>X</b>	
Pregnancy or maternity		<b>X</b>	
Marriage		<b>X</b>	

5. Please complete **each row** of the checklist with an “X”.

### **Screening Checklist**

	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	<b>X</b>	
Does the policy or proposal relate to an area with known inequalities?		<b>X</b>
Would the policy or proposal change or remove services used by vulnerable groups of people?		<b>X</b>
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		<b>X</b>

**If you have answered YES to ANY of the above, then proceed to section B.**

**If you have answered NO to ALL of the above, then proceed straight to section D.**

## SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

This policy is consistent with the council’s aim to ensure that the services we provide are relevant to the needs of all sections of the communities. The proposals are not expected to adversely affect any of the protected equalities groups highlighted in this assessment.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

The policy enables us to put preventative measures in place. However we are unable to monitor the protected groups entering gambling establishments, our evaluation and monitoring is therefore carried out by the complaints process.

## AGE

<p><b>Details of impacts identified</b></p>	<p>Applications for licences and permits under the Gambling Act 2005 may not be made by a child (under 18 years old). Applicants are required to declare that they are over the relevant age at the time of making an application, and may be required to provide their date of birth for specific applications.</p> <p>Any application made by a child, where the legislation prohibits this, will be rejected.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's age, will be disregarded as irrelevant.</p> <p>Gambling activities permitted under licences/permits issued under the Gambling Act 2005 are largely restricted to those ages 18 years old and over. The policy details the legal requirements and expectations of licensees and permit holders to uphold the licensing objective 'protecting children and other vulnerable persons from being harmed or exploited by gambling.' These requirements and expectations are not beyond what would be considered reasonable by the Gambling Commission.</p> <p>Access by customers to gambling premises / activities may be limited or determined by a customer's age, in circumstances where they are below the legal age to participate in the gambling activities available at that premises. There is no upper age limit on gambling activities, and therefore a refusing a person access to gambling premises / activities on the grounds that they were 'too old' would not be sufficient grounds for refusal.</p>
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## DISABILITY

<p><b>Details of impacts identified</b></p>	<p>The Statement of Principles has no adverse impact on disability. Data regarding applicants' disabilities is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application. Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's disability, will be disregarded as irrelevant.</p>
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	<p>Suitability of gambling premises for access/use by disabled persons is dealt with under the Equality Act 2010 and not a relevant consideration in determining gambling applications.</p> <p>An individual may refer to their own disability in a representation with respect to an application, either in passing or as a reason for the proposals adversely affecting them. In determining applications, the Council shall have regard to the Public Sector Equality Duty and ensure consideration is given to relevance of the disability to one or more of the three licensing objectives.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by a customer's disability. As a protected characteristic, disability is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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## RACE

<b>Details of impacts identified</b>	<p>The Statement of Principles has no adverse impact on racial groups. Data regarding applicants' or individuals' race/ethnicity is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's race/ethnicity, will be disregarded as irrelevant.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by which racial group the customer belongs to. As a protected characteristic, racial group is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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## SEX

<b>Details of impacts identified</b>	<p>The Statement of Principles has no adverse impact on gender. Data regarding applicants' or individuals' gender is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's gender, will be disregarded as irrelevant.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by a customer's gender. As a protected characteristic, gender is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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### **SEXUAL ORIENTATION**

<p><b>Details of impacts identified</b></p>	<p>The Statement of Principles has no adverse impact on sexual orientation. Data regarding applicants' or individuals' sexual orientation is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's sexual orientation, will be disregarded as irrelevant.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by a customer's sexual orientation. As a protected characteristic, sexual orientation is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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### **PREGANCY AND MATERNITY**

<p><b>Details of impacts identified</b></p>	<p>The Statement of Principles has no adverse impact on pregnancy and maternity. Data regarding applicants' or individuals' pregnancy and maternity is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's pregnancy and maternity, will be disregarded as irrelevant.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by a customer's pregnancy and maternity. As a protected characteristic, pregnancy and maternity is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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### **RELIGION OR BELIEF**

<p><b>Details of impacts identified</b></p>	<p>Data regarding applicants' or individuals' religion is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's religion, will be disregarded as irrelevant.</p> <p>Representations received by or on behalf of religious persons or groups, where the representation cites religion as a reason for the representation, may be considered in the determination of a gambling</p>
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	<p>application provided that it relates to one or more of the three licensing objectives.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by a customer's religion. As a protected characteristic, religion is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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### **GENDER REASSIGNMENT**

<p><b>Details of impacts identified</b></p>	<p>The Statement of Principles has no adverse impact on gender reassignment. Data regarding applicants' or individuals' on gender reassignment is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's on gender reassignment, will be disregarded as irrelevant.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by a customer's on gender reassignment. As a protected characteristic, on gender reassignment is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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### **MARRIAGE & CIVIL PARTNERSHIP**

<p><b>Details of impacts identified</b></p>	<p>The Statement of Principles has no adverse impact on marriage and civil partnership. Data regarding applicants' or individuals' on marriage and civil partnership is not collected as part of any application process under the Gambling Act 2005, and is not a consideration in the consultation or determination of any application.</p> <p>Any representations submitted regarding an application, where the reason (or one of the reasons) for representation is the applicant's on marriage and civil partnership, will be disregarded as irrelevant.</p> <p>Access by customers to gambling premises / activities should not be limited or determined by a customer's on marriage and civil partnership. As a protected characteristic, on marriage and civil partnership is not sufficient grounds for somebody to be refused access to gambling premises / activities.</p>
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<p>3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?</p>
<p>No</p>



4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

There has been consultation with key stakeholders, and a public consultation undertaken as part of the policy review).

Public consultation was conducted via the online consultation portal on the Brent website.

The results of this consultation informed the final draft of the Statement of Gambling Principles.

5. Please detail any areas identified as requiring further data or detailed analysis.

None identified.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

N/A

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

The council will continue to monitor any changes to the policy. Any further changes or action to be determined by the Service Manager, Anu Prashar.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There is no adverse impact of this policy on any of the protected characteristics.

## **SECTION D – RESULT**

*Please select one of the following options. Mark with an "X".*

<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	


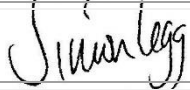
### SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

### SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Anu Prashar 11/10/24	
<b>REVIEWING OFFICER:</b>	Simon Legg 11/10/24	
<b>HEAD OF SERVICE / Operational Director:</b>	Chris Whyte	