

**GAMBLING POLICY****APPENDIX 3****EQUALITIES IMPACT ASSESSMENT*****Introduction***

This impact assessment was undertaken using the methodology and approach set out in Lewisham's Equalities Impact Assessment toolkit. Every new or revised policy requires the undertaking of such an assessment, to ensure that the policy proposals address equalities and that the policy and its implementation meet both the aspirations set out in the Council's equalities policies AND statutory requirements.

This assessment has considered the Gambling Policy proposals which will guide the service, the procedures to be operated and the day to day working practices to be developed. It checks to see whether these are likely to have a positive or negative impact on different groups within our diverse community. However our responsibilities under the Gambling Act 2005 are limited to premises licensing and the responsibility for operators and personal licenses lie with the Gambling Commission

**Steps taken in undertaking the Equality Impact Assessment****1. Management of the Equalities Impact Assessment**

The assessment has been drawn from the findings by Dalewyn Daniel, Performance Quality and Information team, Regeneration, working with Barry Caswell and other members of the Licensing team within Business Regulatory Services when working on the Licensing Act 2003.

**2. Identification of the aims/objectives and purpose of the Gambling Policy**

The Gambling Act 2003 gained royal assent on 7<sup>th</sup> April 2005. It repealed most of the existing legislation relating to gaming and replaced it with a new licensing regime. Responsibility for gaming will be the responsibility of the Licensing Authority and the Gambling Commission.

The stated purpose of the legislation is to provide a clear focus on the promotion of three objectives, which must now form the central purpose when licensing functions are carried out. These are:

- **Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime**
- **Ensuring that gambling is conducted in a fair and open way**

- **Protecting children and other vulnerable persons from being harmed or exploited by gambling**

Lewishams licensing policy sets out the framework within which the council will deliver its new responsibilities. The objective of the licensing process is to allow the continuation of the operation of betting shops, family amusement arcades and AWP within liquor licensed premises in accordance with Act and all relevant guidance as relates to the three licensing objectives.

Through the policy the Council hopes that local people and visitors to Lewisham will have better opportunities to enjoy their leisure time safely without fear of violence, intimidation or disorder.

An effective licensing policy, alongside other initiatives, can work towards promoting positive aspects, such as increasing the leisure industry provision for the community and encouraging regeneration of town centres, as well as controlling negative impacts such as an increase in crime and disorder.

### **Corporate Performance Plan**

The Policy links into Council policy objectives as follows:

- Safety, security and a visible presence – *partnership working with the police and others and using the Council's powers to combat anti-social behaviour;*
- Strengthening the local economy – *gaining resources to regenerate key localities, strengthen employment skills and promote public transport*
- Protection of children – *better safeguarding and joined up services for children at risk;*

## **Regeneration Strategy 2003 - 2006**

The policy links in to these elements of Regenerations service strategy:

- To help create and support an environment where businesses can thrive and inward investment is maximized.
- To improve the local Street Scene, providing clean, safe streets which are well designed and free of clutter in line with our Streetscape Guide.
- To maximize community safety through a range of Warden Schemes (in partnership with Social Care and Health), enforcement action, appropriate design and other measures to tackle anti-social behaviour and crime.
- To support the development of new businesses and employment opportunities

### **3. Scope/focus of the Equality Impact Assessment and assessment of relevance**

Due to the nature of the responsibilities falling to the Licensing Authority, we are only responsible for the premises themselves and the licensing of individuals for operators and personal licenses fall to the Gambling commission it is impossible for us to determine impact on any minority groups.

## **Borough Profile**

The London Borough of Lewisham is an Inner South East London Borough covering an area of 3,473 hectares. The population is 249,000 of which 34% are from minority ethnic communities. The main ethnic minority communities in the borough are of Caribbean, African, Turkish, Turkish Cypriot, Chinese, Vietnamese, Somali, South Asian (Indian, Pakistani, Bangladeshi and Sri Lankan) and Irish origin, and there are over 100 languages spoken in the borough.

In addition, the GLA/LRC (Greater London Authority/London Research Centre) estimate that 37,522 (15.1%) people identify themselves as having a limited long term illness or disability, and the ONS (Office of National Statistics) estimate that 125,600 (52%) of Lewisham's population is female and, 31,894 (12.8%) are over pensionable age.

The northern part of the Borough contains most of the industrial and commercial areas, however in general terms, commercial and residential properties co-exist. Although premises licensed for gaming are located throughout the borough areas of concentration are found at the major and district town centres.

The following table is made up of information gleaned from the 2001 census. It provides a snapshot of the make up of those two wards and compares them to the borough as a whole.

<b><u>Census Category</u></b>	<b><u>Lewisham Borough (all wards)</u></b>	<b><u>Blackheath</u></b>	<b><u>New Cross</u></b>
<b>Ethnicity</b>	34%	39%	63%
<b>People aged 16 – 74 economically inactive</b>	4.5%	3.9%	5.9%
<b>Socio – Economic classification (people aged 16-74 never worked)</b>	4.6%	3.1%	7.6%
<b>Socio – Economic classification (long term unemployed)</b>	1.9%	1.4%	2.6
<b>People aged 10-14</b>	6.2%	4.6%	6.6%
<b>People aged 20-24</b>	7.5%	7%	10.1%
<b>People aged 25-29</b>	9.5%	13.5%	10.9%
<b>People aged 65 - 74</b>	5.7%	5.9%	3.7%

### **The Indices of Deprivation**

Lewisham is a highly diverse borough. Although some areas sustain high levels of affluence, Lewisham is one of the capital's least wealthy boroughs with pockets of acute need. Despite improvements in recent years, 54 (32.5%) of Lewisham's 166 Super Output Areas (SOAs) were ranked within the 20 per cent most deprived SOAs in England according to the Index of Multiple Deprivation 2004 (IMD)<sup>1</sup>. Three of those SOAs were also in the worst 10 per cent. Four of Lewisham's wards have more than 60% of their SOAs in the 20% most deprived category (Evelyn, New Cross, Bellingham and Lewisham Central). Overall Lewisham was ranked as the 57th most deprived local authority in England. When looking at the average score of each individual deprivation domain, Lewisham is the 38th most deprived local authority area in England (this is mainly due to the income domain which places Lewisham as the 27th most income deprived area).

<sup>1</sup> Refer to the map in appendix 3

## **The Unitary Development Plan**

Access to a job is one of the main ways people feel included in society and the Unitary Development Plan sets out policies that protect those sites in the borough that are valued for their employment uses from inappropriate development. Many of the most important employment sites are located in wards with the highest unemployment rates and with the highest populations of people from the Black and Ethnic Minorities.<sup>2</sup>

### **Crime Statistics –**

The CRIS crime statistics for the borough for April 2003 to the present shows New Cross has having the highest number of recorded crimes – 2176 as compared to 1266 for Blackheath and 616 for Whitefoot which had the lowest.<sup>3</sup>

## **5. Consultation**

The Policy will come into effect on the **1<sup>st</sup> January 2006** and will remain in force for not more than 3 years, during that time it will be subject to periodic review and further consultation.

In developing the policy the council has consulted widely to ascertain an appropriate licensing framework for its area.

- The police
- The fire authority
- Current license / permit holders
- Representatives of the local gaming trade
- Representatives of local businesses and residents
- Voluntary and Community Groups including those that represent equalities groups

The feedback gained through this consultation has been scrutinized for equalities implications and no specific issues were raised.

## **6. Assessment of Impact and outcomes and reducing any adverse impact**

This assessment has focused on the draft policy; there will need to be a further Equalities Impact Assessment scheduled as part of the Lewisham 2005-2008

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Race Equality Scheme which will be able to focus on the delivery of the policy in practice.

The overall assessment is that the Licensing Policy does not discriminate and no adverse impacts have been identified.

There are real opportunities now and in the future to implement a process that ties in with other initiatives to work towards promoting the positive aspects such as increasing the leisure industry provision for the community and encouraging the regeneration of town centres as well as controlling the negative impact such as crime and disorder.

The licensing policy can build on the work presently carried out by the council to ensure Lewisham is a dynamic, innovative and attractive place to live, work and learn. The council has prepared a number of strategies that contain visions, aims and objectives to promote, improve and protect the borough. The Licensing Policy has been prepared to promote the three licensing objectives under the Gambling Act 2005, however it must also have regard to the local strategies which have been developed for the borough, its residents, businesses, workers and visitors. It can then secure the proper integration with local crime prevention, planning, transport, tourism and cultural strategies and race equalities schemes by ensuring its policies are consistent with their aims and objectives.

A summary of the issues considered in reaching this conclusion, and actions to be taken for the future are set out below. The actions identified will be part of the Business Regulatory Services Business Plan.

<b>ISSUE of possible concern and equalities categories it will potentially impact on</b>	<b>ACTION taken/to be taken</b>
At present the service has no information as to the level of awareness of its role amongst the various communities within the borough	Use consultation processes to determine what action is needed to achieve public awareness.  Need to widely publicise that service information is available in different formats and languages on request

<p>To ensure that the policy is effective and efficient, there is a need to be able to evaluate and review it. Equalities Monitoring is essential to enable Licensing to do this, so as they can provide and evidence high quality services for all of Lewishams communities</p>	<p>By gathering and recording accurate equalities data, interpreting this and taking appropriate action the service will be able to evaluate and review equalities policies and practices. It will be able to evidence which particular groups, over use or under use its services and the outcome they receive, and uncover discrimination or demonstrate the absence of it. They can then use the information collected to assist in providing services that are responsive to the needs of particular groups.</p>
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## 8. Formal agreement

The Licensing Policy is being put to Members with this Equalities Impact Assessment as an appendix in

## 9. Publication of Results

Results of the assessment will be included in the Council's annual equalities report. They will also be reported to the Social Inclusion Select Committee which will be advised :-

- How the likely impact was assessed
- The information used
- The consultation carried out and summary of results
- The results of the impact assessment
- Policy changes made/to be made as a result of the assessment
- What will happen next

## 10. Monitoring

The achievement of changes, amendments and recommendations arising from the Equality Impact Assessment will be monitored through mainstreaming into the existing robust performance management and business planning systems of the Regeneration Directorate. So, for example, all actions included in the implementation plan will be expected to be included in the Business Regulatory Services annual business plan which will be quality checked by relevant Performance and Quality officers. All Regeneration Equality Impact Assessments will also be monitored by the Regeneration Equalities Board.





