

Equality Impact Assessment

Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

<ul style="list-style-type: none">Any proposals to introduce or add to a service	<ul style="list-style-type: none">Any proposals to adopt policy priorities, strategies and plans
<ul style="list-style-type: none">Any proposals to remove, reduce or alter a service	<ul style="list-style-type: none">Changes to staffing structure where groups of employees are likely to be negatively affected
<ul style="list-style-type: none">Any new policies or changes to policies	<ul style="list-style-type: none">Any proposals in relation to procured or commissioned services

Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have been taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

STAGE 1 – Equality Screening

1. Identify the policy, project, function or service change

a. Person responsible for this EqIA

Officer responsible: Michelle Bignell

Service Area: Licensing

Title: Licensing and Public Protection Manager

Date of assessment: 27.01.25

Signature: Michelle Bignell

b. Is this a policy, function, strategy, service change or project?

Policy

If other, please specify:

c. Name of the policy, function, strategy, service change or project

Is this new or existing?

Already exists and is being reviewed

Please specify reason for change or development of policy, function, strategy, service change or project

Statutory requirement to review every 3 years

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:

The authority is required by the Gambling Act 2005 to publish a Statement of Principles (“Statement”) which they propose to apply when exercising their functions. This 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. The Statement must be then republished.

Objectives:

To ensure that the statement of the principles sets out how Cheltenham Borough Council will exercise its functions under the Act.

To ensure that Cheltenham Borough Council comply with the three-year review requirement set out in S.349 of the Gambling Act 2005.

Outcomes:

Cheltenham Borough Council’s Statement of Principles will be compliant with the Gambling Act 2005.

Benefits:

There is no risk of challenge for not complying with the statutory requirements.

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

Yes

Do you expect the impacts to be positive or negative?

Positive

Please provide an explanation for your answer:

Promotion of the licensing objectives:

- Preventing gambling from being a source of crime or disorder, being associated with crime or 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.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate

Stage Two required

Yes

Owner of Stage Two assessment

Completion date for Stage Two assessment

27.01.25

Please forward this completed form to [add email address] and move on to Stage 2 if required.

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

There has been a downward trend in licensed gambling premises in the Borough. In 2018, there were 16 betting shops and in 2025, there were 9 premises. This is in line with national trends.

Gloucestershire County Council - https://www.gloucestershire.gov.uk/media/x0llvhyr/gambling-related-harm_final-1.pdf which also references [The National Centre for Social Research's report Gambling behaviour in Great Britain in 2015](#), further details are found below in socio-economic factors.

b. Consultation

Has any consultation be conducted?

No

Describe the consultation or engagement you have conducted or are intending to conduct. Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.

If no consultation or engagement is planned, please explain why.

As the policy is remaining unchanged, no consultation has been carried out. The list of consultees within Appendix A of the document will be notified of the re-adoption and the desire to keep under review should the statutory guidance be revised.



3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

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Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Neutral	There is no upper age limit. This is prescribed by statute.	None.
	Younger People (16-25)	Positive	No person under the age of 18 shall be permitted entry to age-restricted licensed premises such as casinos, bingo halls, betting shops and adult gaming centres where gambling is permitted. The Council does not impose any local age restrictions on the application process.	Routine assessment of applications and monitoring to ensure compliance with regulations.
	Children (0-16)	Positive	No person under the age of 18 shall be permitted entry to age-restricted licensed premises such as casinos, bingo halls, betting shops and adult gaming centres where gambling is permitted. The Council does not impose any local age restrictions on the application process.	Routine assessment of applications and monitoring to ensure compliance with regulations.
DISABILITY A definition of disability under the Equality Act 2010 is available here . <i>See also carer responsibilities under other considerations.</i>	Physical disability	Neutral	There is no requirement for the applicant to pass on any details of medical capacity. There are no equality restrictions of who can enter licensed premises. The council hold no information of any applicants from this group.	None.
	Sensory Impairment (sight, hearing)	Neutral	There is no requirement for the applicant to pass on any details of medical capacity. There are no equality restrictions of who can enter licensed premises. The council hold no information of any applicants from this group.	None.

	Mental health	Neutral	<p>There is no requirement for the applicant to pass on any details of medical capacity. There are no equality restrictions of who can enter licensed premises.</p> <p>The council hold no information of any applicants from this group.</p>	None.
	Learning Disability	Neutral	<p>There is no requirement for the applicant to pass on any details of medical capacity. There are no equality restrictions of who can enter licensed premises.</p> <p>The council hold no information of any applicants from this group.</p>	None.
GENDER REASSIGNMENT		Neutral	<p>There are no gender or equality restrictions of who can be a collector providing that the promoter has a valid permit/licence in place and that the individual can satisfy age-restricted requirements.</p> <p>The council hold no information of any applicants are from this group.</p>	<p>None.</p> <p>The policy will grant permits/licenses to any licenced operators that conform to the requirements of this policy without consideration of gender.</p>
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral	<p>There are no gender or equality restrictions of who can be a collector providing that the promoter has a valid permit/licence in place and that the individual can satisfy age-restricted requirements.</p> <p>The council hold no information of any applicants are from this group.</p>	<p>None.</p> <p>The policy will grant permits/licenses to any licenced operators that conform to the requirements of this policy without consideration of gender.</p>
	Men	Neutral	<p>There are no gender or equality restrictions of who can be a collector providing that the promoter has a valid permit/licence in place</p>	<p>None.</p> <p>The policy will grant permits/licenses to any licenced operators that conform to</p>

			<p>and that the individual can satisfy age-restricted requirements.</p> <p>The council hold no information of any applicants are from this group.</p>	<p>the requirements of this policy without consideration of gender.</p>
	Lesbians	Neutral	<p>There are no gender or equality restrictions of who can be a collector providing that the promoter has a valid permit/licence in place and that the individual can satisfy age-restricted requirements.</p> <p>The council hold no information of any applicants are from this group.</p>	<p>None.</p> <p>The policy will grant permits/licenses to any licenced operators that conform to the requirements of this policy without consideration of gender.</p>
	Gay Men	Neutral	<p>There are no gender or equality restrictions of who can be a collector providing that the promoter has a valid permit/licence in place and that the individual can satisfy age-restricted requirements.</p> <p>The council hold no information of any applicants are from this group.</p>	<p>None.</p> <p>The policy will grant permits/licenses to any licenced operators that conform to the requirements of this policy without consideration of gender.</p>
PREGNANCY & MATERNITY	Women	Neutral	<p>There are no gender or equality restrictions of who can be a collector providing that the promoter has a valid permit/licence in place and that the individual can satisfy age-restricted requirements.</p> <p>The council hold no information of any applicants are from this group.</p>	<p>None.</p> <p>The policy will grant permits/licenses to any licenced operators that conform to the requirements of this policy without consideration of gender.</p>
RACE* Further information on the breakdown below each of these headings, is available here .	White	Neutral	<p>There are no race restrictions to who can hold a premises licence or can enter licenced premises providing that they can satisfy any age-restricted requirements. The council hold no information of any applicants from this group.</p>	<p>None.</p> <p>The policy will grant a premise licence to any applicant that conforms to the requirements of this policy without consideration of race.</p>

For example Asian, includes Chinese, Pakistani and Indian etc	Mixed or multiple ethnic groups	Neutral	There are no race restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements. The council hold no information of any applicants from this group.	None. The policy will grant a premise licence to any applicant that conforms to the requirements of this policy without consideration of race.
	Asian	Neutral	There are no race restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements. The council hold no information of any applicants from this group.	None. The policy will grant a premise licence to any applicant that conforms to the requirements of this policy without consideration of race.
	African	Neutral	There are no race restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements. The council hold no information of any applicants from this group.	None. The policy will grant a premise licence to any applicant that conforms to the requirements of this policy without consideration of race.
	Caribbean or Black	Neutral	There are no race restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements. The council hold no information of any applicants from this group.	None. The policy will grant a premise licence to any applicant that conforms to the requirements of this policy without consideration of race.
		Choose an item.		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Neutral	There is no requirement for the applicant to pass on any details concerning faith, religion or belief.	None.. The policy will grant a premises licence to any applicant who has the appropriate operator and personal licences required of the Gambling Commission and who conform with the

				requirements of this policy without consideration of faith, religion or belief.
SEX (GENDER)	Men	Neutral	There are no orientation restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements.	None. The policy will grant a premises licence to any applicant that conforms to the requirements of this policy without consideration of sexual orientation.
	Women	Neutral	There are no orientation restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements.	None. The policy will grant a premises licence to any applicant that conforms to the requirements of this policy without consideration of sexual orientation.
	Trans Men	Neutral	There are no orientation restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements.	None. The policy will grant a premises licence to any applicant that conforms to the requirements of this policy without consideration of sexual orientation.
	Trans Women			
SEXUAL ORIENTATION	Heterosexual	Neutral	There are no orientation restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements.	None. The policy will grant a premises licence to any applicant that conforms to the requirements of this policy without consideration of sexual orientation.
	Lesbian	Neutral	There are no orientation restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements.	None. The policy will grant a premises licence to any applicant that conforms to the requirements of this policy without consideration of sexual orientation.

	Gay	Neutral	There are no orientation restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements.	None. The policy will grant a premises licence to any applicant that conforms to the requirements of this policy without consideration of sexual orientation.
	Bisexual/Pansexual	Neutral	There are no orientation restrictions to who can hold a premises licence or can enter licensed premises providing that they can satisfy any age-restricted requirements.	None. The policy will grant a premises licence to any applicant that conforms to the requirements of this policy without consideration of sexual orientation.
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Neutral	<p>The policy seeks to allow licensed premises the legitimate opportunity to undertake licensed gambling activities providing that they are lawful and within their licensing requirements.</p> <p>Licensed premises must also have procedures in place to protect vulnerable persons from gambling irresponsibly.</p> <p>There are no other equality restrictions other than to protect children and young persons from age restricted gambling activities.</p> <p>National Data available from the NatCen ‘Gambling behaviour in Great Britain in 2015’</p> <p>63% of adults (16+) in Great Britain had gambled in the past year, with men (66%) being more likely than women (59%) to do so.</p>	<p>To be considered during decision making.</p> <p>Additional work will be ongoing with Gloucestershire County Council to ensure that our Local Area Profiles (LAPs) is reviewed and shows local data on at risk and problem gambling.</p> <p>Data and information obtained from the LAPs and gambling risk assessments will be used to influence further amendments to the policy where needed.</p>

The most popular gambling activities were the National Lottery draws (46%), scratch-cards (23%) and other lotteries (15%).

Excluding those who only played the National Lottery draws, just under half of adults (45%) participated in other types of gambling activity; 49% of men and 42% of women.

For both men and women, overall participation was highest amongst the middle age groups and lowest amongst the youngest and oldest age groups. Excluding those who only played the National Lottery draw, gambling participation was highest among younger adults.

Problem Gambling is gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits.

Problem gambling prevalence among adults living in private households was 0.7%. Men were more likely than women to be classified as a problem gambler (1.3% and 0.2% respectively).

The highest rates of problem gambling were among those who had participated in spread betting (20.1%), betting via a betting exchange (16.2%), playing poker in pubs and clubs (15.9%), betting offline on events other than sports or horse or dog racing (15.5%) and playing machines in bookmakers (11.5%).

Problem gambling was more prevalent among people who had participated in a number of gambling activities in the past

			<p>year (prevalence was 11.9% for those who participated in seven or more activities compared to 0.3% of those who had taken part in just one gambling activity in the last year).</p> <p>Overall, 3.9% of adults were categorised as at-risk gamblers.</p> <p>Men were more likely than women to be both low risk and moderate risk gamblers.</p> <p>This also means that the vast majority of people experience no problems from gambling.</p>	
<p>Rurality i.e. access to services; transport; education; employment; broadband</p>		Neutral	<p>The policy will seek to promote organisations that assist with problem gambling.</p> <p>Through regular inspections of licensed premises we will ensure that education and advice is available to gamblers.</p>	<p>Regular review of list of organisations.</p> <p>Routine assessment of applications and monitoring to ensure compliance with regulations.</p>
<p>Other (e.g. caring responsibilities)</p>		Neutral	<p>The policy seeks to allow licensed premises the legitimate opportunity to undertake licensed gambling activities for the benefit of national and local needs.</p> <p>There are no equality restrictions of who can be a premises licence holder.</p> <p>Local communities have an opportunity to visit these premises if they wish.</p>	<p>Routine assessment of applications and monitoring to ensure compliance with regulations.</p>

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available [here](#)

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
To obtain a Local Area Profile for Cheltenham Borough from GCC Public Health	June 2025	Michelle Bignell
To keep under regular review whether a revision of the policy needs to be carried out prior to the three year expiry (January 2028)	Ongoing	Michelle Bignell

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change

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