

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Update Gambling Act 2005 Statement of Licensing Principles
Brief Service Profile (including number of customers)	
<p>Gambling is just one of a number of activities overseen by licensing. The local authority, acting as the licensing authority administers Gambling licences linked to premises, small lotteries and occasional or temporary use gambling activities. Currently in Southampton there are:-</p> <ul style="list-style-type: none"> • 3 casino licences • 10 Adult Gaming Centres • 28 Alcohol licensed permits • 23 Betting premises licences • 4 Bingo licences • 5 club gaming permits • 5 Family Entertainment Centres • 50 Small society lotteries 	
Summary of Impact and Issues	
<p>The Gambling Act 2005 requires the Council to publish a Statement of Licensing Principles (SLP) every three years. The current SLP expires on 31st January 2025. The proposed SLP has an updated Area Profile. The other significant change is to include a section on how the licensing authority will deal with any applications it receives for the large casino licence should it decide to go out to invite applications for it.</p>	

Gambling is a key part of the hospitality industry for the city and generates income, employment, a choice of entertainment and community support. The licensing authority is responsible, in cooperation with the Gambling Commission, for the licensing of premises licences. These venues are highly regulated to create an as safe as possible environment for people to enjoy gambling activity.

There is evidence that a small percentage of participants engage in harmful gambling. The SLP assists in reducing this impact at premises.

Potential Positive Impacts

As above, provides a well-regulated environment for people to enjoy gambling activity with measures in place to reduce the impacts of harmful gambling. Provides employment opportunities in the city and an income in the way of rates and spend generally in the city.

Responsible Service Manager	Phil Bates, Licensing Manger
Date	
Approved by Senior Manager	
Date	

Potential Impact

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Age	Persons under 18 are restricted by law in gambling activities. However The Young People and Gambling Survey 2019 found that 11% of children surveyed had gambled in some form in the last 7 days, down from 23% in 2011. The survey found children and young people (aged 11 to 16) were gambling at higher rates than they were consuming e-cigarettes, smoking or taking illegal drugs. Those who reported gambling were more likely to also report substance use and lower educational attainment. An evidence review conducted by Public Health England has found that there is a significant link between the opportunities to gamble, advertising of gambling, and density of gambling premises with the likelihood of young people trying to gamble or experiencing harm from gambling. The same evidence review also found that family members gambling	Ensuring staff are trained to challenge those they suspect to under age. Support of age recognition software in machines to prevent underage gambling.

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	<p>increased the likelihood of Intimate Partner Violence and other Adverse Childhood Effects that cause significant harms to those that experience them. These can include maltreatment, malnutrition, and physical and psychological abuse.</p> <p>People aged under 24 are identified as at a higher risk of suffering from gambling harms.</p> <p>The Bargate ward has the highest population of those aged 16-24 in the city, with a population of 34.9% young people. The city as a whole has 43,000 young people in the age range most at risk from harm from gambling. The young population is expected to increase by 6% between 2021 and 2028.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p> <p>Population size and structure (southampton.gov.uk)</p>	
Disability	<p>As with age some people with mental health disabilities are susceptible to harmful gambling. Those with sensory disabilities are also likely to have mental health issues which makes them more susceptible to harmful gambling.</p> <p>Public Health England has found that there are correlations with those experiencing poor mental health, social isolation, and disability being more likely to gamble and more likely to experience gambling related harm. This is likely linked to the social and inclusive aspects of gambling premises which are seen by these populations as places where social connections can be</p>	<p>Gambling venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> • 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, and

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	<p>made. An additional factor to be considered is that these populations may be more vulnerable to the harms that gambling can cause, as well as more at risk of those harms to begin with.</p> <p>Depression in Southampton is higher than the England average, with 10.1% of people estimated to have an unresolved diagnosis of depression. Those living in higher levels of deprivation are more likely to have higher levels of depression.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p> <p>Mental health and wellbeing (southampton.gov.uk)</p>	<ul style="list-style-type: none"> protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and intervene.</p> <p>Premises are required to undertake a risk assessment based on the local profile attached to the SLP</p>
Gender Reassignment	No identified impacts.	N/a
Care Experienced	No risks identified	N/a
Marriage and Civil Partnership	<p>Individual studies have been found by Public Health England do support the idea that those not in long term or stable relationships (single, separated, divorced or widowed) may be more likely experience harmful gambling, but the evidence is limited in scope.</p> <p>Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)</p>	<p>Gambling in venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> 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, and protecting children

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		<p>and other vulnerable persons from being harmed or exploited by gambling</p> <p>Staff are on site trained to identify the signs of problem gambling and intervene.</p>
Pregnancy and Maternity	No evidence was found that detailed a link between pregnancy, maternity, and gambling.	N/a
Race	<p>There are significant links between many ethnic minorities and increased gambling rates, with individual studies reporting that some groups are more than three times more likely to gamble and experience gambling related harm than white populations. Some cultures oppose gambling and substance use, and these may be protective factors against gambling harm.</p> <p>There is a wide amount of ethnic diversity within the city, with 22.3% of the population listing their ethnicity as something other than White British.</p> <p>Bargate ward has the 2nd highest rates of ethnic diversity in the city, with 36% of residents identifying as non White British compared to 22% city average.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p> <p>Ethnicity and language (southampton.gov.uk)</p> <p>ward-profile-infographic-bargate_tcm71-404658.pdf (southampton.gov.uk)</p>	<p>Gambling in venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> • 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, and • protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and i Premises are required to undertake a risk assessment</p>

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		based on the local profile attached to the SLP intervene.
Religion or Belief	<p>Some religions oppose gambling and substance use, there is not sufficient evidence to determine if this is a protective factor. While those in religions are less likely to gamble, they may be less likely to seek help for fear of stigma.</p> <p>The largest religion in Southampton is Christian (51.5%), followed by 'no religion' (33.5%). Both philosophies permit gambling.</p> <p>The second largest religion in Southampton after Christianity is Islam, with 4% of the population identifying as Muslim. This rises to 9.6% of the population in Bargate. Islam does not permit gambling.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p> <p>Ethnicity and language (southampton.gov.uk)</p>	<p>Gambling in venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> • 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, and • protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and intervene.</p> <p>Premises are required to undertake a risk assessment based on the local profile attached to the SLP</p>
Sex	Males are more likely to gamble, more likely to gamble more money each time, and are more likely to experience harm from problem or harmful	Gambling in venues is heavily regulated and monitored to support the three licensing Gambling

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	<p>gambling. Landmark birthdays (18 & 21) were found to also increase the likelihood of a young person gambling. Problem and harmful gambling is also present in female populations when studied and problem and harmful gambling should not be thought of as a purely male harm.</p> <p>Males aged 20-24 are the biggest demographic in the city, followed by females aged 20-24.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p> <p>Population size and structure (southampton.gov.uk)</p>	<p>Act licensing objectives</p> <ul style="list-style-type: none"> 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, and protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and intervene.</p> <p>Premises are required to undertake a risk assessment based on the local profile attached to the SLP</p>
<p>Sexual Orientation</p>	<p>The first UK Games Industry Census in 2020 found that LGBT+ people make up 21% of the UK gaming industry, yet LGBT+ people make up just 3–7% of the population. This greatly increases LGBT+ community to gambling related harms.</p> <p><i>[Taylor, M. (2020) UK Games Industry Census: Understanding Diversity in the UK Games Industry Workforce, ukie, University of Sheffield, UKRI and Arts and Humanities Research Council.]</i></p>	<p>Gambling in venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

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<p>Community Safety</p>	<p>The evidence review by Public Health England found that family members gambling increased the likelihood of Intimate Partner Violence and other Adverse Childhood Effects that cause significant harms to those that experience them. These can include maltreatment, malnutrition, and physical and psychological abuse. While not the sole cause of IPV and child maltreatment, it was a significant factor.</p> <p>Domestic violence accounts for 17% of all recorded crime in Southampton, and has increased in each of the previous eight years.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p> <p>Domestic abuse (southampton.gov.uk)</p>	<p>Gambling in venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> • 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, and • protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and intervene.</p> <p>Premises are required to undertake a risk assessment based on the local profile attached to the SLP</p>

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<p>Poverty</p>	<p>Financial harms are the third most commonly reported harm amongst gamblers, irrespective of gambling severity. Various financial harms including debt and bankruptcies have been reported as associated with large gambling properties like Casinos.</p> <p>Southampton is the 55th most deprived local authority in England, and is more deprived than comparator cities like Bristol, Leeds and Sheffield.</p> <p>Deprivation and inequalities between residents and neighbourhoods in Southampton are significant and continue to be a driver for crime and poor health outcomes in Southampton. In addition, key outcomes for children and young people in Southampton continue to be poorer than the national average, with outcomes significantly poorer (and starting earlier in life) for those residents living in the most deprived areas of the city compared to those living in the least deprived areas.</p> <p>Harms associated with gambling: an abbreviated systematic review (publishing.service.gov.uk)</p> <p>Deprivation and poverty (southampton.gov.uk)</p>	<p>Gambling in casinos is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> • 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, and • protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and intervene.</p> <p>Premises are required to undertake a risk assessment based on the local profile attached to the SLP</p>
<p>Health & Wellbeing</p>	<p>Problem gambling is identified as a health issue linked to addiction. On average 3.8% of gamblers are expected to experience negative impacts as a result of their gambling.</p> <p>Gambling provides many opportunities</p>	<p>Gambling in venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p>

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	<p>to cause and exacerbate health harms in the users of gambling premises and their social networks. Harm from gambling increases with alcohol use and there are existing relationships between gambling and other substance use. Gambling and IPV and child maltreatment, and gambling and mental health issues are also linked. Those experiencing negative health issues are more likely to use gambling premises, creating or worsening potential harms like anxiety, neurotic symptoms, suicidality, and degradation of social networks. The financial impact of gambling can create harms that extend beyond the gambling premises, bringing additional pressures to those experiencing harm from gambling.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p>	<ul style="list-style-type: none"> • 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, and • protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and intervene.. Licence holder to provide licensing authority with data showing incidents of problem gambling and interventions so both can work together to minimise impact</p>
<p>Other Significant Impacts</p>	<p>NIGHT SHIFTS Shift work has been shown to have a detrimental effect on the health of employees, negatively impacting daily sleep length, circadian rhythms, work-life balances and stress. This is particularly worse for those working night shifts. Shift work is also associated with obesity, cardiovascular disease, diabetes and cancers. Shift work is also associated with negative impacts on family lives, higher separation rates, less effective parenting, and deterioration of family</p>	<p>Gambling in venues is heavily regulated and monitored to support the three licensing Gambling Act licensing objectives</p> <ul style="list-style-type: none"> • preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to

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	<p>cohesion.</p> <p>_ (publichealthwm.org)</p> <p>VETERANS UK armed forces veterans report a higher prevalence rate of problem gambling compared with non-veterans, with potential negative impact on family life.</p> <p>A Public Health England evidence review found that those experiencing traumatic and violent events like someone being killed, wounded, or physically attacked increased the likelihood of both gambling and gambling related harms, with veterans being a prominent feature in the studies used in the evidence review.</p> <p><i>[Dighton, G., Roberts, E., Hoon, A. E., & Dymond, S. (2018). Gambling problems and the impact of family in UK armed forces veterans, Journal of Behavioral Addictions, 7(2), 355-365. Retrieved Jul 20, 2022, from https://akjournals.com/view/journals/2006/7/2/article-p355.xml]</i></p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p> <p>SUBSTANCE USE There is a strong association between substance use and gambling. Those that use substances (alcohol, tobacco, illegal drugs) are more likely to gamble, and those that gamble are more likely to have substance use issues. At time of writing Southampton has the highest rate of people with alcohol issues being admitted to hospital in the country, according to a pilot survey at UHS.</p> <p>[Gambling-related harms evidence</p>	<p>support crime</p> <ul style="list-style-type: none"> ensuring that gambling is conducted in a fair and open way, and protecting children and other vulnerable persons from being harmed or exploited by gambling <p>Staff are on site trained to identify the signs of problem gambling and intervene.</p> <p>Premises are required to undertake a risk assessment based on the local profile attached to the SLP</p>

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	<p>review: summary - GOV.UK (www.gov.uk)</p> <p>Local Alcohol Profiles for England - Data - OHID (phe.org.uk)</p> <p>EDUCATIONAL ATTAINMENT Young People reporting that they had gambled in the last year were more likely to have lower educational attainment. Lower educational attainment is one of the factors that is typically present in those that problem gamble.</p> <p>ECONOMIC COST The excess economic costs of harmful gambling were estimated as between £1.04bn and £1.7bn for England, primarily affecting homelessness, mental health, suicide, substance use, unemployment, criminal activity and imprisonment.</p> <p>But we expect that the true costs are higher because the lack of evidence meant that it was not possible to cost all types of harms or the wider harms to individuals or society. Previous research on the economic costs of gambling in England (from 2016) estimated the excess cost of harmful gambling to be between £200 million and £570 million for England. These estimates are likely to change with further evidence.</p> <p>RISK TO PUBLIC HEALTH There is limited evidence relating to the specific health effects of casinos in comparison to the health effects of gambling overall. This represents a gap in the available literature and is not the same as evidence of no effect. It is known that the pattern of problem gambling is more correlated with casinos and electronic gaming</p>	

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	<p>machines than the lottery and sports pools.</p> <p>The evidence suggests that harmful gambling should be considered a public health issue because it is associated with harms to individuals, their families, close associates and wider society.</p> <p>[Gambling-related harms evidence review: summary - GOV.UK (www.gov.uk)]</p>	