

# PART A - Initial Impact Assessment

<b>Proposal Name:</b>	Gambling Act 2005 - Statement of Principles (Policy) 2025
<b>EIA ID:</b>	2829
<b>EIA Author:</b>	Shimla Finch (CEX)
<b>Approval Status:</b>	Approved

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**Proposal Outline:**

The Licensing Authority is required to publish a Statement of Principles (a policy document) which it proposes to apply when exercising its functions under the Act, and which must be updated at least every three years. Our functions are to licence the following: • Casinos • Bingo Halls • Betting Shops • Tracks • Adult Gaming Centres • Lotteries • Family Entertainment Centres • Occasional Use Notices • Temporary Use Notices • Club Gaming Machines • Gaming Machines in Licensed Premises The Statement of Principles (Policy) sets the framework for decision-making and the Licensing Authority’s approach to regulation in accordance with the Gambling Act 2005 (‘the Act’) and associated legislation. It sets out how the Licensing Authority views local risk and its expectations of operators operating in its locality. Each application will be considered individually on its own merits. Licensing Authorities are bound under the Act by a statutory duty to ‘aim to permit’ gambling and shall grant premises licences where they consider applications are: • in accordance with the Gambling Commission’s codes of practice • in accordance with the guidance to local authorities • in accordance with the licensing authority’s own statement of principles (our policy) • reasonably consistent with the three licensing objectives. The three licensing objectives, as set out in section 1 of the Act, guide the way the Licensing Authority carry out their functions and ensure that applicants and operators can carry on their business in ways which: • prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime • ensure that gambling is conducted in a fair and open way • protect children and other vulnerable persons from being harmed or exploited by gambling. The policy will therefore assist the Licensing Authority when considering applications under the Act and will provide guidance to applicants, Responsible Authorities (those we consult with) and Interested Parties on the Licensing Authority’s approach to gambling in the City and the requirements for operators to adhere to at a local level. The policy ensures that operators who are already licensed, or want to be licensed, are able to operate responsibly, by way of risk assessing local areas and adopting measures and procedures to ensure the promotion of the licensing objectives. It is intended that the Statement of Principles

(Policy) will ensure that all gambling applications received by the Licensing Authority are treated fairly and in a consistent manner.

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**Proposal Type:** Non-Budget

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**Year Of Proposal:** 24/25

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**Lead Director for proposal:** Richard Eyre

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**Service Area:** Licensing

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**EIA Start Date:** 1/15/2024

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**Lead Equality Objective:** Understanding Communities

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**Equality Lead Officer:** Ed Sexton

## Decision Type

**Committees:** Council

## Portfolio

**Primary Portfolio:** Neighbourhood Services

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**EIA is cross portfolio:** No

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**EIA is joint with another organisation:** No

## Overview of Impact

## Overview Summary:

This policy aims to empower the Licensing Authority to promote the licensing objectives, in particular relating to protecting the most vulnerable from gambling related harm and aims to mitigate risks to those with protected characteristics. Overall, this policy aims to be of positive benefit for everyone, as it details risks that must be addressed by operators and sets out areas of high risk and vulnerability. It will enable the Licensing Authority to better serve the local community by providing clarity for operators as to the relevant factors to be considered in decision making and enabling evidence-based decisions.

## Impacted characteristics:

- Health
- Age
- Disability
- Race
- Religion/Belief
- Sex
- Cohesion
- Poverty & Financial Inclusion
- Voluntary/Community & Faith Sectors

## Consultation and other engagement

### Is consultation or other engagement required:

Yes

Relevant partners including the Sheffield Children Safeguarding Partnership, Public Health and South Yorkshire Police were consulted prior to the formal consultation to ensure the final draft for consultation was as comprehensive and current as possible. The formal public consultation process for the Statement of Principles commenced on the 8th July 2024 and concluded on the 31st August 2024. Section 349 (3) of the 2005 Act states: “In preparing a statement or revision under this section a licensing authority shall consult – (a) either- (i) in England and Wales, the chief officer of police for the authority’s area, or (ii) in Scotland, the chief constable of the police force maintained for the police area comprising that area, (b) one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority’s area, and (c) one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the authority’s functions under this act.” A full list of consultees is listed at Appendix 2 of the policy document. 3,000+ emails and letters regarding the consultation have been sent out to various interested parties which include those bodies listed above. The consultation information was published on the Sheffield ‘Have Your Say’ page with active links to all relevant

## Cumulative Impact

**Does the proposal have a cumulative impact:** No

**Impact areas:**

## Initial Sign-Off

**Full impact assessment required:** Yes

**Review Date:** 9/15/2024

## PART B - Full Impact Assessment

### Health

**Staff Impacted:** Yes

**Customers Impacted:** Yes

**Description of Impact:** 'Staff' in this context applies to gambling premises staff who are at risk of or experiencing direct or indirect gambling-related harms. Concerns about the harms associated with gambling has been increasing and an evidence review by Public Health England (PHE): 'Risk Factors for Gambling and Harmful Gambling' published in 2019 noted that gambling-related harms include health harms. Poor mental health is a stronger predictor of at-risk gambling than both poor physical health and negative health behaviours, with the notable exception of alcohol. Poor mental wellbeing is both a type of gambling-related health harm

and a risk factor for experiencing gambling-related harms with psychological health problems a notable risk factor. To note, the review also found that deaths from suicide appear to be significantly higher in those experiencing gambling-related harms, with evidence suggesting that people with gambling problems are at least twice as likely to die from suicide compared to the general population, and gambling harms may trigger suicide in those already contemplating taking their own life. The review also found that people drinking alcohol at higher risk levels (to health) are also more at risk of gambling-related harms. The evidence in the risk review 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. To address gaps in the above published evidence base, PHE have undertaken a Delphi study on policies and interventions to reduce harmful gambling, which has been published in the Lancet. This study aimed to identify what policies and interventions could be effective to address the gambling-related harms identified in this review. The Gambling Commission has stated that more work is needed to assess the scale of gambling related harm and understand what works best to reduce it. Our proposed policy document's aim is to assist the Licensing Authority in carrying out its functions in a socially responsible manner. The policy document recognises the need to protect children and vulnerable persons from gambling addiction and gambling related harm and promotes heavily this particular objective throughout all sections. This document has also been reviewed by Sheffield City Council's Public Health (PH) team to ensure it mitigates risks relating to any potential impact on health and well-being. The Council's PH team has also drafted a new 'Gambling Related Harm Reduction Strategy' for the City which will go through a public consultation. This strategy will be linked to our policy document in 'Part 3 Integrating Strategies' where operators are asked to consider wider Council policies and strategies when applying to the Licensing Authority. The policy also refers to local and national plans and strategies on health and well-being; not only to children and vulnerable persons, but to all those whose health and well-being may be affected by gambling. The policy document includes sections relating to 'location; and what are perceived by the Licensing Authority as 'sensitive locations'. Operators are required to profile the area in which they propose to operate, and to produce risk assessments which will require them to provide further information on how they intend to mitigate risks and promote the licensing objectives. In addition, the Licensing Authority, alongside Sheffield Public Health, has drafted a separate document, which is to be read in conjunction with the policy, referred to as the 'Local Area Profile'. This is the Licensing Authority's assessment of the local environment and identifies local areas of concerns, as well as the key characteristics of the City. It is intended that the local area profile will provide the Licensing Authority, operators and the public with a better understanding and awareness of the gambling related risks in

the city. In this context, 'risk' includes actual and potential risk and takes into account any future or emerging risks. We expect operators to use the local area profile to help inform them of specific risks that need to be addressed in their local risk assessments, including those relating to risks around health. The policy also informs operators on the importance of social responsibility, best practice, identifying and communicating with vulnerable persons, staff training, primary intervention, 'escalation and for staff to signpost customers to appropriate support services. Operators must also comply with the Gambling Commission's 'Licence Conditions and Codes of Practice' (LCCP) which detail conditions (Social Responsibility Code Provisions) to be adhered to, as well as provisions which set out good practice (Ordinary Code Provisions); these detail requirements around staff and customers in gambling premises which operators must comply with in relation to 'responsible gambling'. Part 2 section 3 of the LCCP deals heavily with the 'Protection of children and other vulnerable persons'; it also requires operators to make an annual financial contribution to one or more organisations which, between them, research the prevention and treatment of gambling related harm, develop harm prevention approaches and identify and fund treatment to those harmed by gambling. Licensing Authorities do not duplicate LCCP requirements in their policy documents but do support these requirements and encourage good practice with operators and can provide advice and assistance.

**Name of Lead Health Officer:**

**Comprehensive Assessment Being Completed:** No

**Public Health Lead signed off health impact(s):**

## Age

**Staff Impacted:** Yes

**Customers Impacted:** Yes

**Description of Impact:** 'Staff' in this context applies to gambling premises staff. The latest Census was held on 21 March 2021 which details that Sheffield had a population of 556,500 individuals, in 232,000 households. This is 0.7% higher than at the 2011 census (552,698). Sheffield has a bulge in population in the 20 to 24 age group due to the significant student population at the city's

two universities, however numbers of people in this age group have declined in comparison with 2011. There are also fewer people in the 40 to 49 age group, but more in the 50 to 59 age group. 50.6% of Sheffield's population is female compared to 49.6% in 2011, with the difference mostly a result of larger numbers of females in 75+ age groups. The Gambling-related harms evidence review: summary - GOV.UK ([www.gov.uk](http://www.gov.uk)) details that people who are classified as gambling at elevated risk levels and experiencing problem gambling are typically male and in younger age groups. The Gambling Commission's annual survey (2023) on the incidence and frequency of young people gambling (<https://www.a.gov.uk/statistics-and-research/publication/young-people-and-gambling-2023>) found that:

- 26% of 11–17-year-olds had spent their own money on any gambling activity in the twelve months prior to completing the survey. This represents a 5% decrease in active participation in gambling compared with rates observed in 2022.
- The most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products, namely:
  - o playing arcade gaming machines such as penny pusher or claw grab machines (19%)
  - o placing a bet for money between friends or family (11%)
  - o playing cards with friends or family for money (5%).
- One in 5 (19%) young people had spent their own money on regulated forms of gambling in the past 12 months reducing to 4 percent when removing 'arcade gaming machines' from the definition of regulated forms of gambling.

There is growing evidence that the prevalence of problem gambling or the vulnerability to developing problem gambling may be higher within certain population sub-groups, two in particular are related to younger people:

- Younger people, particularly men;
- Children of problem gamblers;

The policy document expects applicants to consider the measures necessary to promote the licensing objective in relation to protecting children and other vulnerable persons, which includes:

- preventing children and other vulnerable person from being enticed to gamble or to take part in inappropriate gambling
- how operators intend to prevent children from entering those gambling premises which are 'adult only' premises.

The policy document provides safeguarding tools and safeguarding risk assessments to assist operators in demonstrating how they will adhere to these measures. Operators are also required under the Act to carry out a risk assessment of the local area which reflects policies and measures they will put in place around 'sensitive areas'. The policy document details what the Licensing Authority consider 'sensitive areas', and what extra measures operators will put in place to mitigate the risks identified. In addition, the Licensing Authority, alongside Sheffield Public Health, has drafted a separate document to be read in conjunction with the policy referred to as the 'Local Area Profile'; this is our assessment of the local environment and identifies the key characteristics of the City. It is intended that the local area profile will provide the Licensing Authority, operators and the public with a better understanding and awareness of the gambling related risks in

the city. In this context, risk includes actual and potential risk and takes into account any future or emerging risks. We expect operators to use the local area profile to help inform them of specific risks that need to be addressed in their local risk assessments including those relating to risks around age. The Licensing Authority has consulted with Sheffield Safeguarding Children’s Board throughout the review of this policy document ,and they have fed in further possible safeguarding measures for operators to adhere to in the document. The Gambling Commission issues codes of practices for all operators which heavily describes their social responsibilities relating to children and their access to gambling premises – this would include management measures and policies around access and their own test purchasing on their own premises to test effectiveness (see Licence conditions and codes of practice: 3.2 Access to gambling by children and young persons). The Licensing Authority, along with other key agencies, have produced a local ‘Sheffield Joint Gambling Test Purchase Strategy’, which is set out within the policy document. This provides a clear framework to both enforcement agencies and operators of how persistent failures of test purchases are dealt with in Sheffield.

## Cohesion

**Staff Impacted:** Yes

**Customers Impacted:** Yes

**Description of Impact:** ‘Staff’ in this context applies to gambling premises staff. The Gambling Act 2005 allows Interested Parties and Responsible Authorities to make representations on premises licence applications. This allows communities and groups to voice their views either individually or as a community group. The policy document makes it clear in Part 6 how to do this. It is also now a requirement for gambling operators to carry out risk assessments of local areas which include assessing demographics, deprivation, crime and disorder, to ensure they have measures in place that will mitigate any risks which are associated with the local area in which they wish to operate. In addition, the Licensing Authority with Sheffield Public Health has drafted a separate document linked to the policy referred to as the ‘Local Area Profile’; this is our assessment of the local environment and identifies the key characteristics of the City. It is intended that the local area profile will provide the Licensing Authority, operators and the public with a better understanding and awareness of the gambling related risks in the city. In this context, risk includes actual and potential risk and takes into account any future or emerging risks. We expect operators to use the local area profile to help inform them of specific risks that need to be addressed in their local risk assessments and for



interested parties to use the document to assist in any representations they wish to make.

## Disability

**Staff Impacted:** Yes

**Customers Impacted:** Yes

**Description of Impact:** 'Staff' in this context applies to gambling premises staff. A Census report carried out by the Office of National Statistics in 2021 showed that in 2021, 9.1% of Sheffield residents were identified as being disabled and limited a lot. This figure decreased from 10.6% in 2011. In 2021, just over one in nine people (11.6%) were identified as being disabled and limited a little, compared with 11.0% in 2011. The proportion of Sheffield residents who were not disabled increased from 78.3% to 79.4%. (The Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived their health status and activity limitations, and therefore may have affected how people chose to respond). There is a potential negative impact on disabled people if a premises does not meet the statutory standards as set out in the Equality Act 2010 in relation to reasonable adjustments and discrimination. Should the Licensing Authority receive evidence of the requisite standards not being met, a full investigation will be carried out. 'Disability' encompasses a wide range of definitions as set out in the Equality Act 2010. Research by the Gambling Commission on gambling behaviour in Great Britain conducted in 2015 showed that people with gambling problems often experience a range of negative effects, including mental health issues, with more severe cases leading to crime, thoughts of suicide, or suicide itself. Other aspects of mental health that may impact on an individual's vulnerability to suffering from gambling-related harm or problem gambling may include (but is not limited to) people suffering with depression, anxiety, schizophrenia, and bipolar disorders. A large proportion of mental health problems are classified as a disability under the Equality Act 2010 where they have a long-term effect on the individual's normal day-to-day activity. 'Disability' can include physical and mental conditions and it is considered that people who suffer from disabilities may be more at risk of suffering gambling-related harm. However, in this case it is likely to be people with mental disabilities who are more at risk of gambling-related harm or problem gambling based on this characteristic. Sheffield City Council's 'Joint Strategic Needs Assessment' sets out the growing evidence that the prevalence of problem gambling, or the vulnerability to developing problem gambling, may be higher within certain population sub-groups, particularly:

- Those with other addictions (drugs,

alcohol, nicotine); • Those with mental health difficulties; Those who fall within this category would be classed as ‘vulnerable’ as detailed below. One of the licensing objectives under the Act is “protecting children and other vulnerable persons from being harmed or exploited by gambling”; the policy document sets out to protect not only children but vulnerable people from being harmed or exploited. The Gambling Act 2005 does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Gambling Commission also does not define ‘vulnerable persons’ but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs. The policy document lists ‘risks’ and ‘sensitive areas’ which apply in relation to the protection of vulnerable persons from being harmed or exploited by gambling . Operators will be required to risk assess and show how they will mitigate identified risks around these ‘sensitive areas’ and ensure that they can evidence robust procedures and policies around safeguarding vulnerable persons.

## Poverty & Financial Inclusion

**Staff Impacted:** Yes

**Customers Impacted:** Yes

**Description of Impact:** ‘Staff’ in this context applies to gambling premises staff – please see customer section below for detail of impact. The Sheffield City Council Joint Strategic Needs Assessment states there is growing evidence that the prevalence of problem gambling or the vulnerability to developing problem gambling may be higher within certain population sub-groups, particularly: • Younger people, particularly men; • Those with other addictions (drugs, alcohol, nicotine); • Those with mental health difficulties; • Unemployed, economically inactive, low socio-economic status, deprivation; • Some ethnic groups e.g. new migrants (Shaffer et al, 1999, p1372; Petry et al, 2005; Cochrane collaboration 2012, p6; Geofutures, 2015; Responsible Gambling Strategy Board, 2016, p2; Cowlshaw et al, 2017 p277-8). There is also evidence of increased problem gambling amongst young people experiencing relative deprivation, particularly amongst those who are male, lack social support and who are first generation immigrants (Elgar et al, 2018). Increased peer support for this group of young men was found to alleviate problems (Elgar et al, 2018). The evidence review by Public Health England (PHE): Risk Factors for Gambling and Harmful Gambling’ published in 2019

identified groups most at risk of gambling-related harms; this includes people living in an area of higher deprivation. Income deprivation is one of the seven domains of the Index of Multiple Deprivation (IMD) and is weighted the joint highest with employment at 22.5% in the IMD calculation method. Evidence shows that 5.3% of people in the most deprived neighbourhoods are gambling at levels of elevated risk compared to 3.0% in the least deprived and rates of harmful gambling are over seven times higher in the most deprived neighbourhoods compared to the least deprived neighbourhoods. These disparities are particularly clear when looking at land-based gambling venues, with 21% of venues located in the most deprived decile compared to 2% in the least deprived decile. PHE's evidence review suggests that accessibility of gambling opportunities is associated with increased gambling and gambling related harm. Financial harms, including debt, is one of a number of gambling-related harms that people can experience. This is of particular concern as around one in four people in Sheffield are living in poverty and poverty is getting worse in the city with everyone affected by the current cost of living crisis. To assist Licensing Authorities when determining applications, there is now a requirement for gambling operators to carry out risk assessments of the local area which includes assessing area demographics, deprivation, crime and disorder, and so on, to ensure they have measures in place that will mitigate any risks which are associated with the local area. Part 5 of the Policy document refers to 'location' and 'areas' where operators must show how they intend to mitigate risks. The 'Local Area Profile' drafted by Public Health and the Licensing Authority will assist operators in the risks around demographics / deprivation.

## Race

**Staff Impacted:** Yes

**Customers Impacted:** Yes

**Description of Impact:** 'Staff' in this context applies to gambling premises staff. Sheffield is an ethnically diverse city, with around 21% of its population from black or minority ethnic groups. The largest of those groups is the Pakistani community, but Sheffield also has large Caribbean, Indian, Bangladeshi, and Chinese communities (Census report carried out by the Office of National Statistics in 2021). There is also an increase in the number of overseas students coming into the city. Sheffield City Council's 'Joint Strategic Needs Assessment' states there is growing evidence that the prevalence of problem gambling or the vulnerability to developing problem gambling may be higher within certain population sub-groups, particularly: • Some ethnic groups e.g. new migrants. There is evidence of increased problem gambling

amongst young people experiencing relative deprivation, particularly amongst those who are male, lack social support and who are first generation immigrants (Elgar et al. 2018). Increased peer support for this group of young men was found to alleviate problems (Elgar et al. 2018). The evidence review by Public Health England (PHE): 'Risk Factors for Gambling and Harmful Gambling' published in 2019 found that what it termed problem gambling was greater in the Asian and Asian British (1.1%) ethnic group compared to the White and White British group (0.5%). The Asian and Asian British ethnic group is less likely to take part in gambling than the White and White British group (both overall participation and at-risk gambling), but more likely to experience problematic gambling. There is no breakdown available of ethnicity of customers of gambling premises in the City, and the Licensing Authority hold no evidence that particular ethnic communities are being adversely impacted within the city. The policy document highlights the requirement of gambling operators to conduct local area profiling and carry out risk assessments, this would include operators looking at any risks associated with the demographic in that area and implementing measures to mitigate any associated risks. The 'Local Area Profile' drafted by Public Health and the Licensing Authority will assist operators in the risks around demographics. In addition, the policy document sets out local and national strategies and support for problem gambling.

## Religion / Belief

**Staff Impacted:**

Yes

**Customers Impacted:**

Yes

**Description of Impact:**

'Staff' in this context applies to gambling premises staff. A Census report carried out by the Office of National Statistics in 2021 shows in Sheffield, 43.4% of people stated that they had no religion, an increase from 2011. 38.5% of those in Sheffield are of Christian belief and 10.3% being Muslim belief. The evidence review by Public Health England (PHE): 'Risk Factors for Gambling and Harmful Gambling' published in 2019 did not identify religion and belief as a group of particular concern for this policy area. Consultation of this policy document has been carried out with different faith groups and have shown no concerns raised. Moral or ethical objections will not be taken into account when determining applications for gambling premises and representations can only relate to reasons demonstrating that the licensing objectives are not being met or the application is not in accordance with the Gambling Commission's Codes of Practice, its guidance to Licensing Authorities and the Licensing Authority's Statement of

Principles. The policy requests operators to conduct an area profile risk assessment and assess how to mitigate risks especially around certain buildings that could be affected. Part 5 of the policy document assists with this and looks at 'location', 'risk' and 'area'.

## Voluntary / Community & Faith Sectors

**Staff Impacted:** Yes

**Customers Impacted:** Yes

**Description of Impact:** ‘Staff’ in this context in this group (e.g. through volunteering) who are maybe at risk of or experiencing direct or indirect gambling-related harms through their work. Gambling-related harms affect the work of many agencies in the city including the voluntary, community and faith sector; this is visible in the economic burden of treating and addressing these harms. Public Health England have provided a comprehensive estimate of the economic burden of gambling on society to date by looking at the following categories of harms: - financial – relationship disruption - conflict or breakdown - mental and physical health - cultural - employment and education - criminal activity. The review found that harms associated with gambling cost at least £1.27 billion in 2019 to 2020 in England alone. This analysis includes the first estimate of the economic cost of suicide (£619.2 million) and provides an updated cost of homelessness associated with harmful gambling (£62.8 million). Sheffield accounts for approximately 1% of the population of England, and demographically reflects the English average. This means the societal harms associated with gambling in Sheffield are likely to be in the region of £12.7 million each year including £6.1m through suicide and £628k through homelessness. Gambling-related harms impact on people's physical and mental health, their relationships, housing and finances and can affect a wide range of people such as families, colleagues, employers and wider local communities. To assist Licensing Authorities when determining applications for premises, there is now a requirement for gambling operators to carry out risk assessments of the local area to ensure they have measures in place that will mitigate any risks which are associated with the local area in which they wish to operate. Part 5 of the Policy document refers to ‘location’ and ‘areas’ where operators must show how they intend to mitigate risks.

## Action Plan & Supporting Evidence

## Outline of action plan:

Health The Licensing Authority will promote good health and assist in preventing and tackling ill health:

- Licensing Authority will work closely with internal and external partners to support the improvement of better health and wellbeing.
- The policy document recognises the need to protect children and the vulnerable from gambling addiction and gambling related harm etc. In this respect the Licensing Authority is working closely with the Sheffield Children Safeguarding Partnership, Public Health and other relevant Authorities in doing so.
- It is a requirement under the Gambling Commission's Codes of Practice that operators are to make an annual financial contribution to one or more approved organisations which, between them, research into the prevention and treatment of gambling related harm, develop harm prevention approaches and identify and fund treatment to those harmed by gambling.
- The policy document ensured that operators promote the above by taking into account any relevant local and national strategies (Part 3), this includes the Director of Public Health Report for Sheffield and the Sheffield Joint Health and Wellbeing Strategy and a list of national and local support services.
- Measures put in place by operators through staff training etc, to identify problem gamblers and signposting to support these individuals (this applies to both customers and staff members)
- Age
- The Gambling Act 2005 makes it clear which type of premises allow access to which age groups.
- The policy document also ensures that it is clear what the age restrictions are on at each type of gambling premises.
- The policy document also sets out requirements to ensure appropriate measures are put in place to restrict access. The Licensing Authority, along with other relevant Authorities, will assist operators in ensuring the measures put in place are appropriate.
- The policy document recognises the need to protect children and vulnerable persons from gambling addiction and gambling related harm,, and the Licensing Authority works in close partnership with other relevant Authorities.
- Sex
- Part 5 of the policy document deals with location, area profiling and risk assessments, where gambling operators are now required to carry out risk assessments of local areas which include area demographics, deprivation, crime and disorder, and so on, to ensure they have measures in place that will mitigate any risks which are associated with the local area in which they wish to operate (please also see paragraph 5.4 Risk in the policy document).
- Disability
- Through working in partnership with disability groups and action issues that may arise
- Supporting mental health recovery from gambling addiction by sign posting relevant services and support.

Cohesion The Gambling Act 2005 allows Interested Parties and Responsible Authorities to make representations on premises licence applications. This allows communities and groups to voice their views either individually or as a community group. The policy document makes it clear in Part 6 how to do this and the Licensing Authority will assist individuals/groups/communities who wish to do this. Poverty

and Financial Inclusion It is a requirement for gambling operators to carry out risk assessments of local areas which include area demographics, deprivation, crime and disorder, and so on, to ensure they have measures in place that will mitigate any risks which are associated with the local area in which they wish to operate (please also see paragraph 5,4 Risk). The Licensing Authority will ensure that measures put in place to mitigate any risks are sufficient and will provide advice and referral to support services.

**Action plan evidence:**

- Gambling Act 2005 • Gambling Commissions Guidance to Licensing Authorities • Gambling Commissions 'Licence Conditions and Codes of Practice' (LCCP) • Sheffield's Gambling Statement of Principles • Sheffield City Council's Equality, Diversity and Inclusion Policy Statement 2022 • Equality Objectives 2019-2023. • Equality Act 2010 • Public Health England (PHE): 'Risk Factors for Gambling and Harmful Gambling' published in 2019 • Delphi study on policies and interventions to reduce harmful gambling • Gambling-related harms evidence review: summary - GOV.UK ([www.gov.uk](http://www.gov.uk)) • The Gambling Commission annual survey (2023) (<https://www.a.gov.uk/statistics-and-research/publication/young-people-and-gambling-2023> • Sheffield City Council Joint Strategic Needs Assessment • Shaffer et al, 1999, p1372; Petry et al, 2005; Cochrane collaboration 2012, p6; Geofutures, 2015; Responsible Gambling Strategy Board, 2016, p2; Cowlishaw et al, 2017 p277-8, Elgar et al. 2018. • <https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2021-part-2/gambling> • The National Office of Statistics - 2021 Census data • Census and Population | Sheffield City Council • Sheffield local Insight

**Changes made as a result of action plan:**

**Mitigation**

**Significant risk after mitigation measures:** No

**Outline of impact and risks:**

**Review Date**

**Review Date:**

9/15/2024