



INTEGRATED IMPACT ASSESSMENT (IIA) TOOL

Proposal Details

Title of Policy / Proposal / Initiative	
Review of Ceredigion County Council's Statement of Gambling Policy 2025-2028	
Service Area	Officer completing IIA
Policy, Performance and Public Protection	Gareth Rees (Senior Licensing Officer)
Corporate Lead Officer	Strategic Director
Alun Williams	Barry Rees
Please give a brief description of the purpose of the proposal	
<p>It is a statutory requirement that the Authority's Statement of Gambling Policy is reviewed at least every three years. The policy is intended to provide clarity to officers and to businesses/individuals on the approach that the Authority is likely to take in relation to gambling activities within its area.</p> <p>The changes to the policy as a result of this review are relatively minor. The UK Government is currently undertaking a review of the Gambling Act 2005 with a view to ensuring that the regulatory framework is fit for purpose within the digital age and can continue to meet its aims of protecting children and vulnerable people, prevent gambling related crime, and keep gambling fair and open. Legislative changes are envisaged will require a more comprehensive review of the statement of principles in the near future. However, this does not avoid the statutory requirement to now review and publish a statement of principles for the next three-year period.</p>	
Who will be directly affected by this proposal? HINT	
<ul style="list-style-type: none"> • The general public, • Businesses with a gambling element to their business, • Businesses from outside the County who conduct transactions in Ceredigion, for example, bookmakers that operate at local race and trotting events and consumers who undertake gambling activity. • Fund raisers for good causes and charities. 	

Have those who will be affected by the proposal had the opportunity to comment on it?

The Authority has recently consulted with the interested parties listed at Appendix B of the draft Policy. The consultation took place over an eight week period and 8 responses were received.

The responses have been considered by officers, there were no contentious comments. However, the Council will be unable to address some of the responses, for example, we cannot prohibit gambling, we are also unable to restrict TV / Online advertising.

Version Control

The IIA should be used at the earliest stages of decision making, and then honed and refined throughout the decision-making process. It is important to keep a record of this process so that we can demonstrate how we have considered and included sustainable development, Welsh language and equality considerations wherever possible.

Version Number	Author	Decision making stage <u>HINT</u>	Date Considered	Description of any amendments made <u>HINT</u>
1	Gareth Rees	Post Consultation	03.01.2025	The monitoring of safeguarding activities to protect people up to the age of 21 has been increased to protect people up to 25 years.

Council Corporate Well-being Objectives

Which of the Council’s Corporate Well-being Objectives does this proposal address and how? Click here to read a summary of our [Corporate Strategy 2022-27](#)

Boosting the economy, supporting business, and enabling employment.	The Statement of Gambling Policy is designed in such a way that enables the economy and local business to develop and prosper provided that they are minded to comply with legislative requirements. Officers will always attempt to support businesses by educating to secure compliance. More formal sanctions are retained for more serious cases of non-compliance.
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	<p>Gambling takes place remotely and in public premises such as amusement arcades and family entertainment centres. Some public houses also have gaming machines, which are accessible to the public.</p> <p>The presence of gaming centres in holiday areas can provide recreational amenities, which will attract tourists and boost the local economy. A number of people are employed within gaming centres and betting shops.</p> <p>In addition, the policy covers small society lotteries, raffle tickets and other fund-raising activities.</p>
<p>Creating caring and healthy communities</p>	<p>Health board are notified of any applications and premises operators etc are asked to consider best practice impact when conducting their assessments – <i>(Gambling with Our Health – Chief Medical Officer for Wales Annual Report 2016/17)</i>.</p> <p>The licensing objectives are key pillars to protection from the harms associated with gambling. The Council recognises that the licensing function is only one means of promoting delivery of the three licensing objectives and should not therefore be seen as a means for solving any or all problems associated with gambling within the community.</p> <p>The Council continues to work in partnership with neighbouring authorities, Dyfed-Powys Police, Public Health, the Safer Ceredigion Community Safety Partnership, local businesses, local people and those involved in child protection to promote the licensing objectives as outlined above.</p>
<p>Providing the best start in life and enabling learning at all ages</p>	<p>The policy covers a number of activities, which are age related. In accordance with the policy, Officers conduct inspections at gambling premises, gaming centres and licenced premises to ensure that under-age activity is not taking place.</p>
<p>Creating sustainable, greener, and well-connected communities</p>	<p>N/A</p>

National Well-being Goal: A Prosperous Wales

An innovative, productive, and low carbon society where everyone has decent work and there is no poverty.

Click [here](#) for information about a prosperous Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click [here](#) for information)

It is generally considered that gambling has a negative impact on the personal wealth of participants. There are however safeguards to identify and take action to deter problem gamblers from being able to place bets in licensed betting premises.

Gambling establishments provide employment opportunities within the county borough. Section 153 of the Gambling Act 2005 requires that the Council when making decisions about premises licences and temporary use notices should aim to permit the use of premises for gambling insofar as it is:

- In accordance with any relevant code of practice issued by the Gambling Commission.
- In accordance with any relevant guidance issued by the Gambling Commission.
- Reasonably consistent with the licensing objectives.
- In accordance with the Council's Statement of Licensing Policy.

What evidence do you have to support this view?

Within the most deprived areas of Wales, the survey found there to be three times as many people experiencing gambling harms (0.9%) as in the least deprived areas (0.3%) - Gambling Heath Needs Assessment for Wales Nov 2022.

A number of people are locally employed in gambling and gaming premises.

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

Ensure that premises have socially responsible policies and identify problem gambling. Officers conduct inspections to check compliance with requirements.

National Well-being Goal: A Resilient Wales

A society where biodiversity is maintained and enhanced and where ecosystems are healthy and functioning.

Click [here](#) for information about a resilient Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click [here](#) for information)

N/A

What evidence do you have to support this view?

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

National Well-being Goal: A Healthier Wales

A society where people make healthy choices and enjoy good physical and mental health.

Click [here](#) for information about a healthier Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click [here](#) for information)

Yes, irresponsible gambling can lead to mental health issues and on occasion this can result in cases of suicide. Ceredigion's draft Gambling Policy expects businesses to provide information leaflets and helpline numbers for organisations such as Gamcare and to operate appropriate self-exclusion schemes.

The licensing objectives are key pillars to protection from the harms associated with gambling.

What evidence do you have to support this view?

The Gambling Policy and officers conducting inspections at premises to ensure leaflets are available.

Officers conducting inspections ensure that staff are aware of the signs of problem gambling and know what steps to take to intervene. The policy does not deal with on-line gambling.

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

Inspection visits will be conducted to ensure that self- exclusion policies are being offered and recorded correctly.

National Well-being Goal: A More Equal Wales

A society where everyone has an equal chance whatever their background or circumstances.

This section is longer because you are asked to assess the impact of your proposal on each group that is protected by the **Equality Act 2010**.

Click [here](#) for information about equality in Wales.

Do you think this proposal will have a positive or a negative impact on people because of their age? (Click [here](#) for information)

Children and Young People up to 18	Positive
People 18-50	Positive
Older people 50+	None / Negligible

Describe the positive or negative impacts.

In their joint report on the 'True Cost of Gambling' – Published 29 January 2019, Public Health Wales and Bangor University highlighted that children are particularly vulnerable to gambling harms, both through their own gambling and through the impacts of parental or carer gambling.

The report also highlighted that beginning college or university involves social and economic transitions that can increase the risk of gambling harms. In 2017, two thirds of students at British institutions (equivalent to around 1.2 million) were estimated to have gambled in the last month, with 54% of those reporting their motivation as to make money. One in four gambled more than they could afford.

The draft Statement of Gambling Policy is designed with a view to safeguarding children and vulnerable persons indeed, this is one of the key licensing objectives in the Act.

Age verification checks carried out by the Authority under this policy include checks on anyone appearing to be under 25. The age limit in the previous policy was 21. Following consultation response, we have extended this to age 25.

We also ensure that any age-related complaints are investigated and conduct compliance visits to ensure compliance with policy and safeguarding.

What evidence do you have to support this?

[Gambling as Public Health Issue Wales Eng2.pdf](#)

Chapter 7 of the revised Gambling Policy sets out how the Authority will protect children and other vulnerable persons.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on people because of their disability? (Click [here](#) for information)

Hearing Impairment	None / Negligible
Physical Impairment	None / Negligible
Visual Impairment	None / Negligible
Learning Disability	Positive
Long Standing Illness	Positive
Mental Health	Positive
Other	None / Negligible

Describe the positive or negative impacts.

The revised policy is designed to protect everyone and unlikely to have a significant negative or positive impact on people because they are disabled. However, Public Health Wales and Bangor University's report in 2019 did highlight higher levels of problem gambling among individuals with anxiety and depressive disorders, obsessive compulsive disorder, phobias, panic disorder, eating disorder, psychosis, attention deficit hyperactivity disorder, post-traumatic stress disorder and substance dependency. Since gambling participation was similar among individuals with and without these psychological disorders, this suggests that people with mental illnesses who gamble are more vulnerable to experiencing harms.

The resolution by the Authority to not permit casinos further protects vulnerable people from the risk of being harmed or exploited by gambling.

The policy includes guidance to premises to encourage them to monitor gambling by people who may be classed as vulnerable, e.g. people with a learning disability.

What evidence do you have to support this?

[Gambling as Public Health Issue Wales Eng2.pdf](#)

Chapter 7 of the revised Gambling Policy sets out how the Authority will protect children and other vulnerable persons.

What action(s) can you take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on people who are transgender? (Click [here](#) for information)

Trans Women	None / Negligible
Trans Men	None / Negligible
Non-binary people	None / Negligible

Describe the positive or negative impacts

We have not identified any significant impact on people because of their gender. However, setting out an appropriate and fair policy for licensing of gambling premises in accordance with the Gambling Act 2005, will support principles of fairness and non-discrimination in these licensing processes and help ensure appropriate safeguards and standards are maintained.

What evidence do you have to support this?

The draft policy

What action(s) can you take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on people with different sexual orientation? (Click [here](#) for information)

Bisexual	None / Negligible
Gay Men	None / Negligible

Gay Women/Lesbian	None / Negligible
Heterosexual/Straight	None / Negligible
Describe the positive or negative impacts	
We have not identified any significant impact on people with different sexual orientation, However, setting out an appropriate and fair policy for licensing of gambling premises in accordance with the Gambling Act 2005, will support principles of fairness and non-discrimination in these licensing processes and help ensure appropriate safeguards and standards are maintained.	
What evidence do you have to support this?	
What action(s) can you to take to mitigate any negative impacts?	
Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?	

Do you think this proposal will have a positive or a negative impact on people who are married or in a civil partnership? (Click here for information)	
People who are married	None / Negligible
People in a civil partnership	None / Negligible
Describe the positive or negative impacts	
N/A	
What evidence do you have to support this?	
What action(s) can you to take to mitigate any negative impacts?	
Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?	

Do you think this proposal will have a positive or a negative impact on people who are pregnant or on maternity leave? (Click [here](#) for information)

Pregnancy	None / Negligible
Maternity	None / Negligible

Describe the positive or negative impacts

N/A

What evidence do you have to support this?

What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?

Do you think this proposal will have a positive or a negative impact on people because of their ethnic origin? (Click [here](#) for information)

Asian / Asian British	Positive
Black / African / Caribbean / Black British	None / Negligible
Mixed / Multiple Ethnic Groups	None / Negligible
White	None / Negligible
Other Ethnic Groups	None / Negligible

Describe the positive or negative impacts

The policy applies to all irrespective of ethnic origin. Data from the 2015 Wales Omnibus Survey show that Non-White individuals were less likely to have gambled in the past year (39%) than those who were White British (63%).

However, British surveys consistently show rates of problem gambling to be higher in Non-White ethnic groups, with at-risk gambling higher in those from Asian/Asian British ethnic origin. They (Asian/Asian British) may experience a 'harm paradox' whereby they are less likely to gamble yet more likely to experience harms.

The draft policy is designed with a view to safeguarding children and vulnerable persons indeed, this is one of the key licensing objectives in the Act

What evidence do you have to support this?

[Gambling as Public Health Issue Wales Eng2.pdf](#)

Chapter 7 of the revised Gambling Policy sets out how the Authority will protect children and other vulnerable persons.

What action(s) can you take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on people with different religions, beliefs, or non-beliefs? (Click [here](#) for information)

Buddhist	None / Negligible
Christian	None / Negligible
Hindu	None / Negligible
Humanist	None / Negligible
Jewish	None / Negligible
Muslim	None / Negligible
Sikh	None / Negligible
Non-belief	None / Negligible
Other	None / Negligible

Describe the positive or negative impacts

N/A

What evidence do you have to support this?

What action(s) can you take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on men or women? (Click [here](#) for information)

Men

None / Negligible

Women

None / Negligible

Describe the positive or negative impacts

The proposed Policy has no impact on people because they are men or women.

What evidence do you have to support this?

What action(s) can you take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between men and women?

Do you think this proposal will have a positive or a negative impact on people from the Armed Forces Community? (Click [here](#) for information)

Members of the Armed Forces

None / Negligible

Veterans

Positive

Spouses

None / Negligible

Children

None / Negligible

Describe the positive or negative impacts

A British study found that veterans were ten times more likely to experience problems with their gambling as non-veterans. Social and financial challenges brought about by the transition to civilian life may heighten risks of gambling

harms. The Royal British Legion estimates that 10% of veteran households do not have enough money or savings for daily living costs and fall into debt. Veterans are also at increased risk of post-traumatic stress disorders and other mental health conditions.

The draft policy is designed with a view to safeguarding children and vulnerable persons indeed, this is one of the key licensing objectives in the Act

What evidence do you have to support this?

[Full article: Gambling problems among United Kingdom armed forces veterans: Associations with gambling motivation and posttraumatic stress disorder.](#)

Chapter 7 of the revised Gambling Policy sets out how the Authority will protect children and other vulnerable persons.

What action(s) can you take to mitigate any negative impacts?

Socio-economic Duty

Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, making it more difficult to access basic goods and services.

Family background or where a person is born still affects their life. For example, a child from a wealthy family often does better at school than a child from a poor family, even if the poorer child is more naturally academic. This is sometimes called socio-economic inequality.

Do you think this proposal will have a positive or a negative impact on people experiencing socio-economic disadvantage?

Positive

Describe the positive or negative impacts

Public Health Wales and Bangor University have highlighted that gambling related harm disproportionately affects certain socio-economic groups, which exacerbates existing inequalities. Population groups at greater risk of experiencing problem gambling and/or gambling related harms includes individuals living in most deprived areas, with problem gambling being over seven times higher compared to individuals living in least deprived areas and those with constrained economic circumstances due to unemployment, underemployment, financial difficulties and debt.

The draft policy is designed with a view to safeguarding children and vulnerable persons, this is one of the key licensing objectives in the Act.

What evidence do you have to support this?

[Gambling as Public Health Issue Wales Eng2.pdf](#)

Chapter 7 of the revised Gambling Policy sets out how the Authority will protect children and other vulnerable persons.

The Council ensures that it treats all individuals who are renewing or making new applications for licenses, with equal respect in line with the Council's Strategic Equality Plan

What action(s) can you take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

National Well-being Goal: A Wales of Cohesive Communities

A society with attractive, viable, safe, and well-connected communities.

Click [here](#) for information about cohesive communities.

Does the proposal contribute to this goal? Describe the positive or negative impacts. [HINT](#)

Gambling can be a form of recreation and there are safeguards within the legislation and the policy to ensure it is operated in line with the three 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, and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

What evidence do you have to support this view?

The policy allows organisations to register small society lotteries, raffle tickets etc for good causes – this allows charities and good causes to fund raise and allows action to be taken against unauthorised ones.

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

Officers advise societies and organisations on the requirement and investigates reports of unauthorised activity.

National Well-being Goal: A Wales of Vibrant Culture and Thriving Welsh Language

A society that that promotes and protects culture, heritage, and the Welsh language and which encourages people to take part in the arts, sports, and recreation.

Click [here](#) for information about culture and the Welsh language

Does the proposal contribute to this goal? Describe the positive or negative impacts.

We have not identified a significant contribution to this Goal. Gambling can be viewed as a form of recreational activity and the Statement of Gambling policy aims to ensure that the activity is conducted as safely as possible.

The policy does cover local charities and good causes registering small society lotteries, raffle tickets etc for good causes. This type of activity could contribute to this Goal in terms of raising money for culture, heritage, arts, sports and recreation activities.

As with all the Council's policies, this policy will be available bilingually. Compliance monitoring activities are delivered bilingually.

What evidence do you have to support this view?

Chapter 1.21 covers Registration of Small Society Lotteries.

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

With reference to the following, do you think this proposal will have a positive or negative effect on the Welsh language?

Click [here](#) for information

Opportunities for people to use the Welsh language

Positive

Treating the Welsh language, no less favourably than the English language

Positive

What evidence do you have to support this view?

The policy will be available on the council's website and hard copy format bilingually.

Compliance monitoring activities are delivered bilingually – all staff speak Welsh and English. All letters and certificates of registration (for small society lotteries etc) are bilingual.

What action(s) can you take to increase the positive impact or mitigate any negative impact on the Welsh language?

National Well-being Goal: A Globally Responsible Wales

A society that considers how our actions might impact on other countries and people around the world.

Click [here](#) for information about global responsibility.

Does the proposal contribute to this goal? Describe the positive or negative impacts. [HINT](#)

N/A

What evidence do you have to support this view?

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

Strengthening the Proposal

If you have identified any negative impacts in the above sections, please provide details of any practical changes and actions that could help remove or reduce the negative impacts.

What will you do?	When?	Who is responsible?	Progress
Some minor amendments are proposed after consideration of the consultation responses. Prepare for the next review in line with changes to the Gambling Act (due winter 2026).	January 2027	Trading Standards Manager/Senior Licensing Officer.	

<p>If no action is to be taken to remove or mitigate negative impacts, please justify why. (If you have identified any unlawful discrimination then the proposal must be changed or revised.)</p>			
<p>How will you monitor the impact and effectiveness of the proposal?</p>			
<p>Any complaints, comments about the policy received will be considered and fed into the process at the next review. Any issues of a serious matter can be dealt with via a revision before the next review date, if required.</p>			

Sustainable Development Principle: 5 Ways of Working

Describe below how you have implemented the five ways of working in accordance with the sustainable development principle of the Well-being of Future Generations (Wales) Act 2015

<p>Long term Balancing short-term needs with long-term need and planning for the future.</p> <p><u>HINT</u></p>	<p>There is a requirement to review the authority’s statement of gambling policy at least every 3 years and it will need to be further reviewed when the Gambling Act review is published.</p> <p>It’s likely that the next review will provide a more long-term vision to protect people from harmful gambling practices, with particular emphasis on new technology.</p>
<p>Collaboration Working together with other partners to deliver.</p> <p><u>HINT</u></p>	<p>Collaboration takes place between the licensing authority, the other neighbouring authorities and all Wales expert licensing panel. The collaboration addressed common themes affecting all authorities but did not address local issues or considerations particular to each authority</p>
<p>Involvement Involving those with an interest and seeking their views.</p> <p><u>HINT</u></p>	<p>This policy has been consulted on;</p> <p>On an ongoing basis, Interested Parties can make representations about new licence applications, or apply for a review of an existing licence.</p>


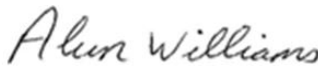

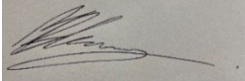
	<p>An Interested Party is someone who</p> <p>(a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities;</p> <p>(b) Has business interests that might be affected by the authorised activities; or</p> <p>Represents persons in either of the two groups above.</p>
<p>Prevention Putting resources into preventing problems occurring or getting worse.</p> <p><u>HINT</u></p>	<p>There is an emphasis on prevention as the policy and the licensing process ensures that a number of checks and safeguards are in place before a licence is granted.</p> <p>Ongoing, compliance visits are carried out and checks are made to ensure that responsible gambling practices are followed by the gambling premises.</p>
<p>Integration Considering the impact of your proposal on the four pillars of well-being (social, economic, cultural and environment) the objectives of other public bodies and across service areas in the Council.</p> <p><u>HINT</u></p>	<p>When a new application for permission and authorisation under the Gambling Act is received, the following are asked for feedback on the application:</p> <ul style="list-style-type: none"> • Public Health Wales • Trading Standards • Health and Safety team • Planning Policy • MAWW Fire & Rescue Service • Children and Adult Services • Dyfed Powys Police • Home Office Alcohol Licencing team <p>This ensures a broad spectrum of views and ensures a strategic fit with the objectives of other public bodies as well as relevant service areas in the Council.</p>

Risk

Summarise the risk associated with the proposal.

	1	2	3	4	5
Impact Criteria	Very Low	Low	Medium	High	Very High
Likelihood Criteria	Unlikely to occur	Lower than average chance of occurring	Even chance of occurring	Higher than average chance of occurring	Expected to occur
Risk Description	Impact		Probability	Score (Impact x Likelihood)	
None identified.					

Sign Off

Position	Name	Signature	Date
Corporate Manager	Carwen Evans		12/02/2025
Corporate Lead Officer	Alun Williams		12/02/2025
Corporate Director	Barry Rees		13/02/2025
Portfolio Holder	Cllr Matthew Vaux		28/02/2025

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¹ Last updated 20/10/2023