

Revised Equality Impact Assessment (EqIA) March 2018

Equality Impact Assessment (EqIA)		
Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Community lottery	Date EqIA created: 8th October 2018
Value of savings to be made (if applicable):	N/A	
Name and job title of completing/lead Officer	Rachel Gapp, Head of Policy	
Directorate/ Service responsible	Policy Team, Strategic Commissioning, Resources & Commercial	
Organisational approval		
EqIA approved by Directorate Equality Task Group (DETG) Chair	Name	Signature
	Alex Dewsnap	<input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval 8 th October 2018

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)
<p>a) What is your proposal?</p> <p>To introduce a community lottery in Harrow as a way to raise funds to support local good causes in the borough</p>
<p>b) Summarise the impact of your proposal on groups with protected characteristics</p> <p>Our assessment indicates there could be a potential minor impact on people with disabilities, from different races/ethnicities and religions in either engaging with, playing or accessing the lottery due to it being exclusively online and technically a form of gambling albeit recreational or 'light'.</p>
<p>c) Summarise any potential negative impact(s) identified and mitigating actions</p> <p>The potential minor impacts would be around accessing the lottery online for people with certain disabilities or with limited English. There is also a potential minor impact for people and organisations of a particular faith – particularly Islam which opposes all forms of gambling.</p> <p>In terms of players, the business case is predicated on only 1-3% of the population playing, so 1970 - 5909 people out of an approximate player population of 197.000. It therefore does not assume that the majority of the population would need to play to make it viable and there is significant scope for people to exercise their own personal choice.</p> <p>We will look at how we can promote other ways for people to donate to local good causes alongside the lottery should they feel they cannot or would not engage with a lottery.</p> <p>We will also speak to the external lottery management company about what options for disability friendly adaptations and translation might be possible and will work with local VCS organisations to provide marketing and communications materials in other languages/formats where there is a need.</p>

2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	The lottery is able to be played by anyone over the age of 16. There are therefore 197,000 possible players within Harrow, but there is no restriction on player location so in reality the pool is much wider. In accordance with our Gambling Commission license application we have a children and vulnerable person protection policy to ensure we are taking reasonable steps to prevent people under age from playing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disability	The lottery is playable online only. This keeps the administration costs down and enables as much as possible – 60p in the £1 to go to good causes. This may mean that people with certain disabilities may find it difficult to play.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	There is nothing in the way the lottery is set up and administered that would prevent or discriminate against people undergoing gender reassignment from playing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage and Civil Partnership	There is nothing in the way the lottery is set up and administered that would prevent or discriminate against people in marriage or a civil partnership from playing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Pregnancy and Maternity	There is nothing in the way the lottery is set up and administered that would prevent or discriminate against people who are pregnant or on maternity from playing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Race/ Ethnicity	We know there are 155 languages spoken in Harrow Schools and that 1% of the population in the borough cannot speak English at all. The Lottery is all online which would make it easier to access translation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<p>Harrow is also said to be the most religiously diverse borough in the country. The borough had the highest proportion of Hindus, Jains and members of the Unification Church, the second highest figures for Zoroastrianism and was 6th for Judaism. 37% of the population are Christian, the 5th lowest figure in the country. Muslims account for 12.5% of the population.</p> <p>Some religions are more tolerant of gambling than others. Buddhism is tolerant of recreational and habitual gambling. Christianity, Hinduism and Judaism imply that gambling is not acceptable but do use lighter forms of gambling (bingo, lottery) to raise money for churches and communities. Islam is the only major religion that opposes all forms of gambling.</p> <p>In terms of players, it is personal choice and the business case is predicated on only 1-3% of the population playing, so does not assume that the majority of the population would need to play to make it viable.</p> <p>For organisations who could be potential beneficiaries from the lottery, the criteria to sign up to be a good cause replicates our small grants/Crowdfund Harrow criteria which stipulates that organisations that promote the adoption of a particular faith or religion are not eligible, so there would be no undue discrimination. Religious organisations tend to set up a separate charitable arm in order to meet eligibility criteria and access a wider range of funds and overcome the issue of the grant coming from gambling.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex	There is nothing in the way the lottery is set up and administered that would prevent or discriminate against people of different sex/genders from playing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sexual Orientation	There is nothing in the way the lottery is set up and administered that would prevent or discriminate against people's sexual orientation from playing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?

Yes No

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

<p>Disability – risk that people with certain disabilities will not be able to play the lottery online</p>	<p>We will speak to the External Lottery Management company about various mitigations they could provide such as large text etc to make it easier for people with disabilities to use the website.</p> <p>We can consider promoting other options for donating to local good causes for those who cannot or will not engage with a local lottery</p>	<p>We will seek to monitor the no. people declaring a disability playing the lottery</p>	<p>April 2019</p>	<p>Rachel Gapp</p>
<p>Race/Ethnicity – risk that people who do not speak English well, may not be able to engage with the lottery</p>	<p>We will speak to the External Lottery Management company about what translation options might be available to make it easier for people who don't speak English to use the website.</p> <p>We can also work with the Communications team and VCS organisations to ensure marketing materials are available in alternative languages.</p> <p>We can consider promoting other options for donating to local good causes for those who cannot or will not engage with a local lottery</p>	<p>We will seek to monitor the no. people declaring their race/ethnicity playing the lottery</p>	<p>April 2019</p>	<p>Rachel Gapp</p>
<p>Religion – risk that people and organisations from certain faiths will not engage with the lottery due to it being gambling</p>	<p>The criteria to sign up to be a good cause replicates our small grants/Crowdfund Harrow criteria and stipulates that organisations that promote the adoption of a particular faith or religion are not eligible, so there would be no undue discrimination of one faith over another.</p>	<p>We will seek to monitor the no. people declaring their religion playing the lottery</p>	<p>April 2019</p>	<p>Rachel Gapp</p>

	<p>Religious organisations can set up a separate charitable arm in order to meet eligibility criteria and access a wider range of funds and overcome the issue of the grant coming from gambling.</p> <p>We can consider promoting other options for donating to local good causes for those who cannot or will not engage with a local lottery.</p>			
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4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

The introduction of a local lottery can also have a positive impact by enabling local voluntary and community sector groups who often support people with protected characteristics from accessing vital funds to sustain their operations. The community lottery raises funds from the local community for the local community creating a direct link between the people playing and the good causes. Stories of winners and beneficiaries can help foster good relations between people from different groups and encourage more participation.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

No change required: the EqIA has not identified any potential for disproportionate impact and all opportunities to advance equality of

opportunity are being addressed
<input checked="" type="checkbox"/> Outcome 2 Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4
<input type="checkbox"/> Outcome 3 This EqIA has identified missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.
Include details here