

Camden Council Equality Impact Assessment Form

Before beginning this equality impact assessment (EqIA) form, you should use the [EqIA screening tool](#) to decide whether you need to complete an EqIA for your activity and read the [EqIA guidance](#).

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard¹ to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and
- promote good relations between people who share a protected characteristic and those who don’t.

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact equalities@camden.gov.uk where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

¹ [Due regard](#) is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying ‘due regard’ means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

Title of the activity	
Camden Late Night Levy Review.	
Officer accountable for the EqIA (e.g. director or project sponsor)	
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Person reviewing the EqIA (reviewer)	
Full name:	William Sasu
Position:	Public Protection and Licensing Manager
Directorate:	Investment, Place and Opportunity
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Version number and date of update Version 3 (20/01/2026)	

Step 1: Clarifying aims

1.a Is it a new activity or one that is under review or being changed?

New
 Under review
 Being changed

1.b. Which groups are affected by this activity?

Staff
 Residents
 Contractors
 Other (please detail): Businesses (Premises licence holders), Responsible Authorities, visitors.

1.c Which Directorate does the activity fall under:

Supporting People
 Investment, Place and opportunity
 Corporate Services
 More than one Directorate. Please specify:

1.d Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

The review was commissioned to assess whether Camden's Late Night Levy (LNL) continues to achieve its intended purpose of promoting safety and reducing the impacts of late-night alcohol-related activity. The key objectives were to evaluate how effectively the Levy supports the management of the evening and night-time economy, whether it remains fair and proportionate for businesses, and how well it aligns with the Council's wider strategic priorities.

The review examined:

The **impact** of Levy-funded police and safety interventions, particularly in Camden Town and other late-night hotspots.

The **fairness and distribution** of contributions, including whether the burden falls evenly across different types and locations of licensed premises.

The **transparency and accountability** of how Levy funds are spent, including communication with Levy-paying businesses.

The views of **residents, businesses, responsible authorities, and community stakeholders**, collected through consultation and engagement.

Comparative **approaches in other local authorities** to identify good practice and improvement opportunities.

The scope of the review included financial data, crime and enforcement trends, stakeholder feedback, and legislative developments, including 2023 powers enabling area-based Levy application and inclusion of late-night refreshment premises.

Officers have considered the review and assessed the potential impact the review may have on protected groups. The considerations are set out in this EIA.

Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested?

Is there currently any evidence of discrimination or disadvantage to the groups?

What will the impact of the changes be?

You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.

2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- Age
- Disability, including family carers²
- Gender reassignment³
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Age

The table below illustrates Camden's population by age group. (2021 Census data)

All Ages (years)	210,145	100%
0-9 years	19,875	9.40%
10-19 years	24,126	11.40%
20-29 years	42,196	20.10%
30-39 years	37,075	17.60%
40-49 years	27,818	13.20%
50-59 years	25,015	11.90%
60-69 years	16,265	7.70%
70-79 years	11,347	5.40%
80+ years	6,287	3.00%

Premises providing licensable activities or unlicensed activities have the potential to affect the majority of age groups in Camden. The Council's current Statement of Licensing Policy contains provisions, which specifically aim to protect children from being at risk of harm that may arise from the activities provided at licensed premises at all times.

² This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

³ This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

Disability, including invisible disabilities and learning disabilities

In the 2021 ONS Census, of 210,145 residents, 15.2% were disabled under the equality act. Broken this group down further, 6.7% of the population stated that their disability limited their day-to-day activities a lot, 8.5% said their disability impacted their day to day activities a little. A further 5.7% of the population did not qualify as disabled under the equality act but had long term physical or mental health conditions that did not limit their day to day activities.

2021 ONS Census

Neurodivergence such as Autism, ADHD, dyslexia and dyspraxia, whether or not the resident identifies themselves as disabled

In the Adult Social Care Activity and Finance Report, in 2023/24, an estimated 435 adults aged 18-64 received support for a learning disability during the 23/24 reporting year.

[Adult Social Care Activity and Finance Report](#)

The location of licensed premises and the activities in and around those locations has the potential to affect all protected groups in Camden and the wider community and therefore, community safety. Disabled people are more likely to be the victims of crime than people who are non-disabled across all age ranges with the exception of those over 65. The risk may increase for some people with this particular characteristic.

Disabled people may be subject to hate crime, which is any incident or crime, which is the victim, or any other person perceives to be motivated because of a person's disability or perceived disability. This is "disability hate crime" and not necessarily associated with activities at or near to licensed premises.

The Council cannot duplicate or enforce other legislation and as such, this review and Camden's Statement of Licensing Policy is unable to address some specific impacts on this group such as barriers to accessing licensed premises.

As part of the council's revised enforcement approach, consideration will be given to whether licensed premises comply with relevant accessibility standards. This includes assessing how well venues accommodate individuals with disabilities, in line with the Equality Act 2010 and other applicable legislation. Promoting inclusive access will be an important element of ensuring that all members of the community can safely and fairly enjoy licensed spaces.

Gender reassignment

No data is available in respect of gender reassignment.

Transphobic hate crimes in England and Wales have reached record levels in recent years. In the year ending March 2024, police recorded 4,780 transgender hate crime offences, a slight decrease from 4,889 in the previous year. This marks a significant rise from 2,799 offences in 2020/21, indicating a troubling upward trend over the past decade

At this stage, officers have not identified specific issues arising from this review that will affect this protected group.

Marriage and civil partnership

The table below illustrates Camden's population by marital and civil partnership status.

All usual residents aged 16 and over	177,909	100%
Single	99,156	55.7%
Married	54,665	30.7%
In a registered civil partnership	1,033	0.6%
Separated, still legally married/ civil partnership	3,933	2.2%
Divorced or civil partnership dissolved	13,124	7.4%
Widowed or surviving civil partnership partner	5,998	3.4%

Officers have considered that people in this group are likely to have more than one protected characteristic.

Pregnancy and Maternity

There were 3,024 conceptions in Camden in 2021. It was down from 3,127 the year before. The rate climbed from 47 conceptions per 1,000 women in 2020 to 52.9 conceptions per 1,000 women in 2021. This is low compared with greater London and nationally and has been slowly declining since 2011.

Officers have not identified specific issues that will affect this protected characteristic.

Race

Camden's population is ethnically diverse. In 2021, 40% of Camden residents were from black or minority ethnic (BME) groups. The needs and experiences of residents from different races in Camden will vary considerably. The issues identified that relate to the current Statement, are:

- Communication barriers: some people are unable to access our services due to the lack of appropriate resources such as translation or interpretation materials for speakers of other languages.
- Community safety: this includes racial harassment, violence and hate crime against people from different races. BME groups are more likely to be the victims of personal crime.
- Hate crime: any incident or crime, which the victim or any other person perceives to be motivated because of a person's race, is a hate crime. Research shows that many hate crimes go unreported.

Ethnicity, identity, language & religion	Number	%
All ethnic groups	210,145	100%
White	125,064	59.5%
Mixed/Multiple Ethnic Groups	13,938	6.6%
Asian or Asian British	38,042	18.1%
Black or Black British	18,892	9.0%
Other Ethnic Group	14,200	6.7%

The location of licensed premises has the potential to affect all protected groups in Camden. The risk increases in respect of this protected group. Camden's Statement of Licensing Policy contains provisions, which specifically aim to protect people from the risk of harm arising from the activities at or near to these venues including people with this protected characteristic.

Religion or belief

The table below illustrates Camden's population by religion or belief.

All (including "not stated" and "no religion")	220,338	100%
Christian	65,980	34.0%
Buddhist	2,410	1.3%
Hindu	3,991	1.4%
Jewish	10,079	4.5%
Muslim	33,830	12.1%
Sikh	487	0.2%
Other religion	1,842	0.6%
No religion	72,776	25.5%
Religion not stated	18,743	20.5%

Religion or belief may also overlap with other protected characteristics such as race.

The issues experienced by different religious/belief groups may vary significantly.

Sex

The information below illustrates Camden's population by sex.

Male	99,424	47.0%
Female	110,580	53.0%

Licensed premises especially night time venues, such as pubs, bars, and clubs, can display a range of unacceptable behaviours. These behaviours can have an adverse impact on the safety of this protected group.

A YouGov poll of 2,013 adults aged between 18 and 24 who drink in bars, clubs, or pubs found that:

- 72% said they had seen some form of sexual harassment
- 63% of women and 26% of men said they had experienced unacceptable behaviour
- 79% of women said they expected inappropriate comments, touching and behaviour on a night out toward them or their friends

The Council's Statement of Licensing Policy includes an additional section around women's safety in the evening and night time economy under the Prevention of Crime and Disorder licensing objective.

The removal of the Late Night Levy may reduce Police resource that is currently in place providing protection to this protected characteristic.

Sexual orientation

The Office for National Statistics (ONS) (2021 Census) suggests that in Camden, 82.6% of the population identify as heterosexual/straight; 6.2% identify as gay, lesbian, or bi-sexual; 0.7% have an alternative sexual identity and 10.5% did not answer.

However, in recent years, Camden has seen a decline in the number of venues catering for people with this protected characteristic.

Intersectional Groups

N/A

2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

Foster carers

N/A

Looked after children/care leavers

N/A

Low-income households

N/A

Refugees and asylum seekers

N/A

Parents (of any gender, with children aged under 18)

N/A

People who are homeless

N/A

Private rental tenants in deprived areas

N/A

Single parent households

N/A

Social housing tenants

N/A

Any other, please specify

N/A

2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

No evidence or data found

Step 3: Impact

Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote “good relations” – a better understanding or relationship between people who share a protected characteristic and others?

3.a Potential negative impact on protected characteristics

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Age	Yes	Younger adults are heavier users of NTE spaces; a removal of LNL-funded policing could reduce visible policing and safety interventions during late hours, increasing risks for younger patrons.
Disability including carers	Yes	Disabled people may rely on a visible, well managed night-time environment, reductions in policing or support services may reduce feelings of safety and practical assistance (e.g. Safe Havens). If Levy-funded services (Safe Havens) are reduced, disabled visitors could be disproportionately affected.
Gender reassignment	Yes	Trans and gender-diverse people can be particularly vulnerable in night-time spaces. Reduction in targeted safety measures (training, Safe Havens, police presence) could increase risk and reduce confidence in safe access. The report highlights women's safety initiatives delivered alongside Levy funds (WAVE, Ask for Angela), so changes may affect these vulnerable groups.
Marriage/civil partnership	No	N/A

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy/ maternity	Yes (Potentially)	Pregnant people may be vulnerable to safety incidents; a reduction in visible policing could reduce reassurance and practical support.
Race	Yes (Potentially)	Minority ethnic communities may live or work in particular wards; spatial differences in Levy-funded activity could mean some ethnic groups experience less benefit or greater exposure to NTE harms. Also, BAME workers in the NTE may be affected by changes to policing/resource allocation.
Religion or belief	No	No direct evidence of impact, though some faith communities may be concentrated near certain NTE areas and be affected by noise/public nuisance changes.
Sex	Yes	Women and girls are highlighted in the report as a specific focus for safety initiatives (WAVE, Ask for Angela). Reductions in Levy-funded initiatives could disproportionately affect women's sense of safety in the night-time economy. Conversely, improved targeted spend (under reform options) could positively impact women.
Sexual orientation	Yes (Potentially)	LGBTQ+ venues have declined historically; Levy changes that negatively affect grassroots venues or increase costs may disproportionately damage spaces used by LGBTQ+ communities. Conversely, targeted support could help preserve inclusive venues.

3.b Potential positive impact on protected characteristics

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	Retaining/enhancing Levy-funded policing and support (e.g. Safe Havens, awareness campaigns) can improve safety for younger patrons and staff.
Disability including carers	Yes	If Levy funds are used to expand Safe Havens and training (WAVE), accessibility and support for disabled visitors can improve.
Gender reassignment	Yes	Targeted funding for initiatives such as WAVE, Ask for Angela and vulnerability training can improve safety and inclusion for women, trans and LGBTQ+ customers and staff. The review highlights examples (Hackney) where accreditation and training improved outcomes.

Marriage/civil partnership	No	N/A
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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Pregnancy/ maternity	No	N/A
Race	Yes	Better-targeted, transparent spend (expanded consultative group) could direct resources to under-served wards and communities, reducing disparities.
Religion or belief	Yes	Better-targeted, transparent spend (expanded consultative group) could direct resources to under-served wards and communities, reducing disparities.

Sex	Yes	Better-targeted, transparent spend (expanded consultative group) could direct resources to under-served wards and communities, reducing disparities.
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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Sexual orientation	Yes	<p>The research will also be used to determine any specific concerns in respect of diversity, safety, and inclusivity at venues for people with this protected characteristic. The information obtained through the research will enable officers to consider whether additional measures could be included in the reviewed Statement of Licensing Policy.</p> <p>Any changes will extend existing measures to mitigate harm, and this will be a positive benefit of the Policy.</p>

3.c Potential negative impact on other characteristics

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster carers	No	N/A
Looked after children/care leavers	No	N/A

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Low-income households	No	N/A
Refugees and asylum seekers	No	N/A
Parents (of any gender, with children aged under 18)	No	N/A

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless	No	N/A
Private rental tenants in deprived areas	No	N/A
Single parent households	No	N/A

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Social housing tenants	No	N/A
Any other, please specify	No	N/A

3.d Potential positive impact on other characteristics

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers	No	N/A
Looked after children/care leavers	No	N/A
Low-income households	No	N/A

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Refugees and asylum seekers	No	N/A
Parents (of any gender, with children aged under 18)	No	N/A
People who are homeless	No	N/A

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Private rental tenants in deprived areas	No	N/A
Single parent households	No	N/A
Social housing tenants	No	N/A
Any other, please specify	No	N/A

3.e Consider intersectionality.⁴ Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

Officers have not identified any specific issues that will affect people who have a combination, or intersection, of two or more characteristics

⁴ Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

Step 4: Engagement - co-production, involvement or consultation with those affected

4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?
<p>The review engaged a range of stakeholders: Levy-paying businesses (in-person business visits), BIDs (Camden Town Unlimited, Fitzrovia Partnership), residents' associations, trade associations (BBPA, UKHospitality, NTIA), the Metropolitan Police, council licensing and community safety teams, landowners and licensing consultants. A total of 27 completed interviews/surveys were collected, plus wider outreach.</p>	<p>Key issues raised included: lack of transparency on spending, perceived unequal benefit (Camden Town concentration), concerns about fairness for quieter premises and grassroots cultural venues, and the importance of women's safety initiatives and visible policing.</p>
<p>Public Consultation open to all persons of protected characteristic. Beginning 01/12/2025</p>	

5 This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

Engagement with other teams / partners

- Internal: Licensing, Community Safety, Finance, Highways (for public realm issues), Events team.
- External: Metropolitan Police (Camden Town Centre Team), BIDs, trade associations, resident groups, Hackney/Islington as comparator partners

The report notes limited data from some groups (e.g. trade associations could not specify exact Camden membership), and variation in business engagement levels.

Step 5: Informed decision-making

5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

<p>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.</p>	<p>The evidence shows the Levy funds valuable policing and safety activity (approx. 72 hours/week) that contributes to crime reduction and public reassurance. However, transparency, perceived fairness and spatial equity issues were raised. The most proportionate approach is to retain the Levy to safeguard policing resources while implementing reforms (Option A) to improve transparency, broaden consultation and consider expanding the contribution base (late-night refreshment premises) and area-based targeting. This balanced approach mitigates risks to vulnerable groups (women, disabled people, students, low-income workers) while addressing business concerns about fairness and oversight.</p>
<p>2. Continue the work as it is because no potential negative impacts have been found</p>	<p>See 1 above</p>

3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)	See 1 above
4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact	See 1 above

Step 6: Action planning

6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

Action	Due	Owner
Publish clear transparency reports	First report within 3 months of decision	Licensing Team
Expand Consultative Group and formalise governance	Establish within 6 months	Licensing Team
Expansion of contribution base	Consultation and impact assessment within 3 months	Licensing Team
Monitoring & evaluation framework	First monitoring return at 6 months	Licensing Team/ MPS

Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to ‘sense check’ your approach to the EqIA and ask them to review the EqIA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqIA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at equalities@camden.gov.uk

Step 8: Sign-off

EqIA author	Name: Afshar Ahmad Job title: Licensing Team Leader Date: 20/01/2026
EqIA advisor / reviewer	Name: William Sasu Job title: Public Protection & Licensing Manager Date: 20/01/2026
Senior accountable officer	Name: Oliver Jones Job title: Director of Recreation & Public Safety Date: 20/01/2026