

PLEASE BRING THIS AGENDA WITH YOU

1

The Lord Mayor will take the Chair at ONE  
of the clock in the afternoon precisely.

This being the occasion  
of the Lord Mayor taking  
his seat for the first time,  
Members are requested to  
appear in their Gowns.



## COMMON COUNCIL

SIR/MADAM,

You are desired to be at a Court of Common Council, at **GUILDHALL**, on  
**THURSDAY** next, the **6th day of December, 2018**.

JOHN BARRADELL,  
*Town Clerk & Chief Executive.*

*Guildhall,  
Wednesday 28th November 2018*

Sir David Wootton

Alastair King

}

*Aldermen on the Rota*

1     **Apologies**

2     **Declarations by Members under the Code of Conduct in respect of any items on the agenda**

3     **Minutes**

To agree the minutes of the meeting of the Court of Common Council held on 18 October 2018.

**For Decision**  
(Pages 1 - 16)

4     **Vote of Thanks to Late Lord Mayor**

To pass the Vote of Thanks, read informally at the last meeting of the Court, to the late Lord Mayor.

(Pages 17 - 18)

5     **Resolutions on Retirements, Congratulatory Resolutions, Memorials**

6     **Mayoral Visits**

The Right Honourable The Lord Mayor to report on his recent overseas visits.

7     **Policy Statement**

To receive a statement from the Chairman of the Policy and Resources Committee.

**For Information**

8     **Docquets for the Hospital Seal**

9     **The Freedom of the City**

To consider a circulated list of applications for the Freedom of the City.

**For Decision**  
(Pages 19 - 28)

10    **Legislation**

To receive a report setting out measures introduced into Parliament which may have an effect on the services provided by the City Corporation.

**For Information**  
(Pages 29 - 30)

## 11 **Appointments**

To consider the following appointments:

- (A) One Member on the **Hospitality Working Party of the Policy and Resources Committee**, for the balance of a term expiring in April 2019.

**Nominations received:-**  
Karina Dostalova

**For Decision**

## 12 **Questions**

## 13 **Motions**

- (A) To consider a Motion submitted by Graeme Harrower, concerning the establishment of a Working Party.
- (B) To consider a Motion submitted by Graeme Harrower, concerning the establishment of a Working Party.
- (C) By Robert Allan Merrett, Deputy  
“That the Resolution of Thanks to Timothy Russell Hailes, Alderman and Pewterer and Neil Graham Morgan Redcliffe, Citizen and Basketmaker, the late Sheriffs of the City, passed by Common Hall on 1 October last, be presented in a form agreeable to them?”

(Pages 31 - 34)

## 14 **Awards and Prizes**

**For Information**

## 15 **Policy and Resources Committee**

To consider a new Projects Procedure, delegate future amendments to the Projects Procedure to the Policy and Resources Committee; and approve an amendment to Standing Order No.50(3).

**For Decision**  
(Pages 35 - 70)

## 16 **Hospitality Working Party of the Policy and Resources Committee**

To consider recommendations concerning the provision of hospitality.

**For Decision**  
(Pages 71 - 72)

## 17 **Policy & Resources and Finance Committees**

To consider the creation of a Brexit Contingency Fund.

**For Decision**  
(Pages 73 - 80)

**18 Planning and Transportation Committee**

To consider the annual On-Street Parking Accounts for 2017/18 and related funding of Highway Improvements and Schemes.

**For Decision**  
(Pages 81 - 84)

**19 Planning and Transportation Committee**

To consider the progression of the Blackfriars Bridge refurbishment and repair of the parapets to Gateway 5.

**For Decision**  
(Pages 85 - 86)

**20 Epping Forest and Commons Committee**

To endorse the appointment of an Epping Forest Verderer (South).

**For Decision**  
(Pages 87 - 90)

**21 Licensing Committee**

To consider the draft Statement of Licensing Principles, The Gambling Local Area Profile, and the Guidance on Undertaking Local Gambling Risk Assessments.

**For Decision**  
(Pages 91 - 166)

**22 Community and Children's Services Committee**

To receive a report of action taken under urgency procedures relating to the Middlesex Street Estate and York Way Estate Communal Heating and Hot Water system.

**For Decision**  
(Pages 167 - 168)

**23 Establishment Committee**

To receive a report of action taken under urgency procedures relating to the new post of a Grade J Chief Operating and Financial Officer, City of London Police.

**For Information**  
(Pages 169 - 170)

**MOTION**

**24 By the Chief Commoner**

That the public be excluded from the meeting for the following items of business below on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act, 1972.

**For Decision**

25     **Non-Public Minutes**

To agree the non-public minutes of the meeting of the Court held on 18 October 2018.

**For Decision**  
(Pages 171 - 174)

26     **Finance Committee**

To consider a request for additional resources for 2018/19.

**For Decision**  
(Pages 175 - 178)

27     **Finance Committee**

To consider the award of a contract for housing repairs, maintenance and voids.

**For Decision**  
(Pages 179 - 182)

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## BOWMAN, MAYOR

# COURT OF COMMON COUNCIL

**18th October 2018**  
**MEMBERS PRESENT**

### ALDERMEN

Nicholas Anstee  
The Rt. Hon. the Lord Mayor, Charles Edward Beck Bowman  
Emma Edhem  
John Garbutt  
Alison Gowman  
Prem Goyal OBE JP

David Andrew Graves  
Robert Picton Seymour Howard  
Robert Hughes-Penney  
Gregory Jones QC  
Sheriff Vincent Thomas Keaveny  
Alastair John Naisbitt King  
Ian David Luder JP

Professor Michael Raymond Mainelli  
Matthew Richardson  
William Anthony Bowater Russell  
The Rt Hon the Baroness Patricia Scotland of Asthal, QC  
Sir David Hugh Wootton

### COMMONERS

George Christopher Abrahams  
John David Absalom, Deputy  
Caroline Kordai Addy  
Munsur Ali  
Randall Keith Anderson  
Alexander Robertson Martin Barr  
Douglas Barrow  
Matthew Bell  
John Bennett, Deputy  
Nicholas Michael Bensted-Smith, JP  
Christopher Paul Boden  
Mark Bostock  
Keith David Forbes Bottomley, Deputy  
David John Bradshaw, Deputy  
Tijs Broeke  
Roger Arthur Holden Chadwick, OBE, Deputy  
John Douglas Chapman  
Henry Nicholas Almroth Colthurst  
Karina Dostalova  
Simon D'Olier Duckworth, OBE, DL

Peter Gerard Dunphy  
Mary Durcan  
Kevin Malcolm Everett  
Anne Helen Fairweather  
Sophie Anne Fernandes  
John William Fletcher  
Marianne Bernadette Fredericks  
Caroline Wilma Haines  
The Revd Stephen Decatur Haines, Deputy  
Graeme Harrower  
Christopher Michael Hayward  
Tom Hoffman, Deputy, MBE  
Ann Holmes  
Michael Hudson  
Wendy Hyde, Deputy  
Jamie Ingham Clark, Deputy  
Clare James, Deputy  
Angus Knowles-Cutler  
Gregory Alfred Lawrence  
Vivienne Littlechild JP, MBE  
Natasha Lloyd-Owen

Oliver Arthur Wynlayne Lodge, TD  
Edward Lord, OBE, JP, Deputy  
Paul Nicholas Martinelli  
Andrew Paul Mayer  
Catherine McGuinness, Deputy  
Andrew Stratton McMurtrie, JP  
Wendy Mead, OBE  
Robert Allan Merrett, Deputy  
Andrien Gereith Dominic Meyers  
Brian Desmond Francis Mooney, Deputy  
Hugh Fenton Morris, Deputy  
Alastair Michael Moss, Deputy  
Sylvia Doreen Moys, MBE  
Benjamin Daniel Murphy  
Barbara Patricia Newman, CBE  
Dhruv Patel OBE  
Susan Jane Pearson  
John Petrie  
William Pimlott  
James Henry George Pollard, Deputy

Henrika Johanna Sofia Priest  
Jason Paul Pritchard  
Stephen Douglas Quilter,  
Richard David Regan, OBE, Deputy  
James de Sausmarez  
Ruby Sayed  
John George Stewart Scott, JP  
Ian Christopher Norman Seaton  
Oliver Sells QC  
Jeremy Lewis Simons  
Tom Sleigh, Deputy  
Graeme Martyn Smith  
Sir Michael Snyder  
James Michael Douglas  
Thomson, Deputy  
John Tomlinson, Deputy  
James Richard Tumbridge  
William Upton  
Mark Raymond Peter Henry Delano Wheatley  
Philip Woodhouse, Deputy

*Scott, J.G.S.,  
J.P.; Ingham  
Clark R.J. Deputy*

***Resolved Unanimously*** – That Liz Green, one of the Sheriffs of the City, be invited to take her seat on the Dais.

1. Introduction of Newly-Elected Member

Natasha Lloyd-Owen, lately elected to be of the Common Council for the Ward of Castle Baynard, was introduced to the Court and, having previously made the declaration prescribed by the Promissory Oaths Act, 1868, took her seat.

2. Apologies

The apologies of those Members unable to attend this meeting of the Court were noted.

3. Declarations      There were none.
4. Minutes          *Resolved* – That the Minutes of the last Court are correctly recorded.
5. Draft Vote of Thanks to the Lord Mayor      Henry Colthurst, for the Ward of Lime Street, read the draft terms of a vote of thanks to the Right Honourable The Lord Mayor, which was intended to be Moved formally at the next meeting of the Court.
- The Lord Mayor was heard in reply.
6. Letter              A letter of the Lord Mayor Elect, declaring his assent to take upon himself the Office of Lord Mayor, was received.
7. Resolutions      There were none.
8. Mayoral Visits      Before providing his report, The Right Honourable The Lord Mayor first directed the Court of Common Council's attention to the 113 seated silhouettes within the Great Hall, explaining this was part of the *There But Not There* campaign. The figures represented the 112 City Corporation and City of London Police officers, together with the one Common Councilman, who had died on active service during the Great War.
- The Right Honourable The Lord Mayor then reported on his recent overseas visits to Qatar, Turkey, Switzerland, India and advised that he would be travelling to the USA on a visit that would include Lake Havasu where, fifty years ago, the previous London Bridge had been transplanted.
- The Right Honourable the Lord Mayor finished his update by thanking Members of the Court of Common Council for their enthusiastic engagement with the Members' Briefings held by the Lord Mayor and the Chairman of Policy and Resources. He also thanked Members for their support over the course of his Mayoral year.
9. Election of Chief Commoner      The Court proceeded to elect a Chief Commoner for 2019/20.
- Three valid nominations had been received in accordance with Standing Order No. 18, for Deputy Roger Chadwick, Deputy Tom Hoffman, and Deputy Brian Mooney.
- The Court therefore proceeded, in accordance with Standing Order No.10, to ballot.
- The Lord Mayor requested the Chief Commoner and the Deputy Chairman of the Finance Committee, to be the scrutineers of the ballot.
- After all first preference votes were counted, the result was announced as follows:-
- |                                  |   |          |
|----------------------------------|---|----------|
| Chadwick, R.A.H., O.B.E., Deputy | - | 14 Votes |
| Hoffman, T.D.D., M.B.E., Deputy  | - | 46 Votes |
| Mooney, B.D.F., Deputy           | - | 39 Votes |
- With no candidate having obtained 50% of the vote, Deputy Chadwick (as the candidate with the fewest votes) was therefore eliminated and his votes reallocated



according to second preference votes (where indicated).

After the reallocation of second preference votes, the results were as follows:-

Hoffman, T.D.D., M.B.E., Deputy	-	55 Votes
Mooney, B.D.F., Deputy	-	43 Votes

Whereupon the Lord Mayor declared Deputy Tom Hoffman to be elected to the office of Chief Commoner for 2019/20.

Deputy Hoffman was heard in response.

10. Policy Statement

The Chairman of the Policy and Resources Committee spoke to update Members on her withdrawal from the Future Investment Initiative Conference taking place in Riyadh the following week.

11. Hospital Seal

There were no docquets for the seal.

12. Freedoms

The Chamberlain, in pursuance of the Order of this Court, presented a list of the under-mentioned, persons who had made applications to be admitted to the Freedom of the City by Redemption:-

<b>Lydia Srebernjak</b> <i>Mark Watson-Gandy</i> <i>James Alastair Christian Watson-Gandy</i>	a Solicitor, retired <i>Citizen and Scrivener</i> <i>Citizen and Pattenmaker</i>	Kensington, London
<b>Michael Ciaran Wallace</b> <i>Donald Henry McGarr</i> <i>David Benjamin Morris</i>	a Technical Consultant <i>Citizen and Basketmaker</i> <i>Citizen and Solicitor</i>	Rickmansworth, Hertfordshire
<b>Iain Battenfeld Robertson</b> <i>The Rt. Hon The Lord Mayor</i> <i>John Dominic Reid</i>	a School Teacher <i>Citizen and Grocer</i>	Deal, Kent
<b>Emily Clare Bohdana Locke</b> <i>David Henry Clifton Griffiths</i> <i>Patrick John Marsland-Roberts, TD</i>	a Graduate <i>Citizen and Farrier</i> <i>Citizen and Carman</i>	Earls Court, London
<b>Roger Brian Lee</b> <i>Iain Reid</i> <i>Richard Leslie Springford</i>	a Chartered Surveyor <i>Citizen and Educator</i> <i>Citizen and Carman</i>	Great Amwell, Hertfordshire
<b>Gary Stinson</b> <i>Karina Dostalova, CC</i> <i>Anne Helen Fairweather, CC</i>	a Local Government Officer <i>Citizen and Marketor</i> <i>Citizen and Common Councilman</i>	Dunstable, Bedfordshire
<b>Benjamin Duke Broomfield</b> <i>Reginald Beer</i> <i>Nicholas Rory Kemp</i>	a Photographer <i>Citizen and Poulter</i> <i>Citizen and Poulter</i>	Hackney, London
<b>Frances Ann Barron</b> <i>Richard Stuart Goddard</i> <i>Richard Leslie Springford</i>	a Client Service Director <i>Citizen and Shipwright</i> <i>Citizen and Carman</i>	Glasgow, Scotland

<b>Donald William Charles Lovatt</b> <i>Simon Phillip Bannister</i> <i>Anthony Leonard Wright</i>	a Fire Officer, retired <i>Citizen and Blacksmith</i> <i>Citizen and Blacksmith</i>	Bromley, Kent
<b>Christopher Joseph Simmins</b> <i>Mark Roderick Winton Griffiths</i> <i>David John Inker</i>	an Electrical Engineer <i>Citizen and Carmen</i> <i>Citizen and Carman</i>	Twickenham, Middlesex
<b>Peter Banastre Tarlton</b> <i>Graham John Peacock</i> <i>Richard Eaglesfield Floyd</i>	a Chief Technology Officer <i>Citizen and Loriner</i> <i>Citizen and Basketmaker</i>	Pangbourne, Berkshire
<b>Rodney Strong</b>  <i>John Edwin Hughes</i> <i>Cyrus Soleiman Poteratchi</i>	a Biomedical Scientist, retired <i>Citizen and Loriner</i> <i>Citizen and Skinner</i>	Bothamsall, Nottinghamshire
<b>Stephen Anthony Martell</b> <i>Peter Francis Clark</i> <i>Martin Victor Edwards</i>	a Teacher <i>Citizen and Mason</i> <i>Citizen and International Banker</i>	Loxwood, West Sussex
<b>Dr Andrew Peter Tyrrell</b> <i>Roger Arthur Holden Chadwick, OBE, Deputy</i> <i>Philip Woodhouse, Deputy</i>	a Chartered Engineer, retired <i>Citizen and Bowyer</i>  <i>Citizen and Grocer</i>	Epsom, Surrey
<b>Sally Elizabeth Beck</b> <i>David Alastair Morgan-Hewitt</i> <i>Philippe Roland Rossiter</i>	a Hotelier <i>Citizen and Innholder</i> <i>Citizen and Innholder</i>	Bledlow, Buckinghamshire
<b>Penelope Margaret Harley</b> <i>Patricia Muriel Snell, OBE</i> <i>Timothy Edward Statham</i>	a University Professor <i>Citizen and Clockmaker</i> <i>Citizen and Clockmaker</i>	Maida Vale
<b>Iain Michael Stanford</b> <i>James George Williams</i> <i>Keith David Forbes Bottomley, Deputy</i>	a Welcome Host <i>Citizen and Builders Merchant</i> <i>Citizen and Wheelwright</i>	Hornchurch, Essex
<b>Besserat Abraha Atsebaha</b> <i>Graham Edward Barnes, JP</i> <i>Alan Grainger Fairbrass</i>	a Superintendent Registrar <i>Citizen and Clockmaker</i> <i>Citizen and Distiller</i>	Ilford, Essex
<b>Mary Anne Barnes</b> <i>Graham Edward Barnes, JP</i> <i>Alan Grainger Fairbrass</i>	a Registrar <i>Citizen and Clockmaker</i> <i>Citizen and Distiller</i>	Westminster
<b>Philip Charles Summers</b> <i>Robert James Ingham Clark, Deputy</i> <i>Matthew Damian Hampson</i>	a Police Officer, retired <i>Citizen and Clothworker</i> <i>Citizen and Information Technologist</i>	Mill Hill, Barnet
<b>Richard Harvey Smith</b> <i>Guy Fairbank</i> <i>Wg Cdr Michael Greville Dudgeon, OBE</i>	a Civil Servant <i>Citizen and Vintner</i> <i>Citizen and Mercer</i>	Lee, Lewisham
<b>Peter Allen Michael Perry</b> <i>Iain Reid</i> <i>Richard Leslie Springford</i>	a Tax Adviser <i>Citizen and Educator</i> <i>Citizen and Carman</i>	Banbury, Oxon
<b>Lucy Jane Horswill</b> <i>Anne Elizabeth Holden</i> <i>Ann-Marie Jefferys</i>	an Equine Instructor <i>Citizen and Basketmaker</i> <i>Citizen and Glover</i>	Lingfield, Surrey

<b>Dennis Conrad</b> <i>William Barrie Fraser, OBE</i> <i>Ian Kelly</i>	an Information Technology Consultant <i>Citizen and Gardener</i> <i>Citizen and Butcher</i>	Fetter Lane, London
<b>Clifford Hutchison Bowen</b> <i>Keith David Forbes Bottomley, Deputy</i> <i>Christopher Michael Hayward, CC</i>	a Union Council Member <i>Citizen and Wheelwright</i> <i>Citizen and Pattenmaker</i>	Grangemouth, Scotland
<b>Sophie Jane Jordan</b> <i>Michael Woolston Jordan</i> <i>Ronald Douglas Mortlock Jordan</i>	an Education Officer <i>Citizen and Plaisterer</i> <i>Citizen and Plaisterer</i>	Great Bookham, Surrey
<b>Ernest William Bristow</b> <i>Dominic Charles How Price</i> <i>John Paul Tobin</i>	a Telecommunications Company Director <i>Citizen and Carmen</i> <i>Citizen and Carmen</i>	Farningham, Kent
<b>Fyona Elizabeth Knight</b> <i>James Henry George Pollard, Deputy</i> <i>Mark Ian Henderson</i>	a Credit Risk Analyst <i>Citizen and Skinner</i> <i>Citizen and Currier</i>	Wimbledon, London
<b>Philip John Clark</b> <i>Mark Ian Henderson</i> <i>John Garbutt, JP, Ald.</i>	an Investment Manager <i>Citizen and Currier</i> <i>Citizen and Weaver</i>	Cambridge, Cambridgeshire
<b>George Bradburn</b> <i>Gerald Albert George Pulman, JP</i> <i>Richard Neil Thomas Coles</i>	a Motor Trade Managing Director, retired <i>Citizen and Basketmaker</i> <i>Citizen and Carman</i>	Chandlers Cross, Hertfordshire
<b>Robert Charles Pepper, MBE</b> <i>Lord Robert George Alexander Lingfield, Kt., DL.</i> <i>Nigel Anthony Chimmo Branson, JP</i>	a Teacher <i>Citizen and Goldsmith</i> <i>Citizen and Haberdasher</i>	Harpenden, Hertfordshire
<b>Peter Christopher Wilson</b> <i>Alison Jane Gowman, Ald.</i> <i>David Andrew Graves, Ald.</i>	a Local Government Officer, retired <i>Citizen and Glover</i> <i>Citizen and Solicitor</i>	Donnington, West Sussex
<b>Wenli Song</b> <i>Wendy Mead, OBE, CC</i> <i>Christopher Michael Hayward, CC</i>	a Business Association Chairman <i>Citizen and Glover</i> <i>Citizen and Pattenmaker</i>	Putney, London
<b>Colin George Bird</b> <i>Timothy Peter Dumenil</i> <i>Roderick Rudd Caxton Spencer</i>	a Non-Executive Chairman <i>Citizen and Butcher</i> <i>Citizen and Art Scholar</i>	Brentwood, Essex
<b>Andre Mannini</b> <i>Mervyn Doreen Redding</i> <i>Christopher Tristan Churcher</i>	an Operations Director <i>Citizen and Basketmaker</i> <i>Citizen and Basketmaker</i>	Wandsworth, London
<b>Blaise William Sadler</b> <i>Evelyn Elizabeth Guest</i> <i>Roger Arthur Holden Chadwick, OBE, Deputy</i>	a Student <i>Citizen and Educator</i> <i>Citizen and Bowyer</i>	Ashted, Surrey
<b>Dr Louise Otter</b> <i>Peter Claude Cave</i> <i>Daphne Edwina Cave</i>	a Senior Risk Specialist <i>Citizen and Insurer</i> <i>Citizen and Glover</i>	Stock, Ingatestone, Essex

<b>John Edward Simpson</b> <i>Alison Jane Gowman, Ald. James Henry George Pollard, Deputy</i>	a London Fire Brigade Borough Commander <i>Citizen and Glover Citizen and Skinner</i>	East Dulwich, London
<b>Samantha Carol Logue</b> <i>Houston Putnam Lowry Derek Ross</i>	an Electrical Engineer <i>Citizen and Arbitrator Citizen and Arbitrator</i>	Windsor, Connecticut, United States of America
<b>Charles Albert Logue III</b> <i>Houston Putnam Lowry Derek Ross</i>	a Financial Adviser <i>Citizen and Arbitrator Citizen and Arbitrator</i>	Enfield, Connecticut, United States of America
<b>Dr Dilan Dipak Joshi</b> <i>Mark John Herbage Sarah Jane Fletcher Harris</i>	a Medical Doctor <i>Citizen and Cook Citizen and Basketmaker</i>	Bushey, Hertfordshire
<b>William John Phillips</b> <i>John Stuart Foster John Alan Rodford</i>	a Professional Boxing Referee <i>Citizen and Farrier Citizen and World Trader</i>	Hornchurch, Essex
<b>David Raymond Van Beveren</b> <i>Trevor James Brignall Trevor Ford</i>	a Property Development Company Director <i>Citizen and Marketer Citizen and Security Professional</i>	Beckenham, Kent
<b>James Douglas Wheeler</b> <i>George David Hare Armitage Jeffrey David Fuller</i>	a Brick Company Director <i>Citizen and Tyler &amp; Bricklayer Citizen and Tyler &amp; Bricklayer</i>	Benington, Hertfordshire
<b>Vincent Marie L Camerlynck</b> <i>John Garbutt, JP, Ald. Mark Ian Henderson</i>	a Financial Services Director <i>Citizen and Weaver Citizen and Currier</i>	Sydenham Hill
<b>Neil Francis Ridley</b> <i>Michael Steele Keith Grant  Richard John Hopkinson-Woolley</i>	a Chartered Surveyor <i>Citizen and Information Technologist Citizen and Goldsmith</i>	Danbury, Essex
<b>Edmund Douglas Pearson</b> <i>Mark John Herbage Sarah Jane Fletcher Harris</i>	a Civil Servant <i>Citizen and Cook Citizen and Basketmaker</i>	Watchet, Somerset
<b>Christopher James Rothery</b> <i>Michael Steele Keith Grant  Patrick Ernest Cooper</i>	an Investment Manager, retired <i>Citizen and Information Technologist Citizen and Vintner</i>	Piltdown, East Sussex
<b>Anne Marie Lomas</b> <i>Frederick Joseph Trowman Anthony Sharp</i>	a Restaurant General Manager <i>Citizen and Loriner Citizen and Loriner</i>	Greenwich, London
<b>Julian Anderson Bowman</b> <i>Michael Steele Keith Grant  Charles Verriour Marment</i>	an Oil Broker <i>Citizen and Information Technologist Citizen and Draper</i>	Battersea, London

<b>Robert Patrick Quain, TD</b> <i>Michael Steele Keith Grant</i> <i>Patrick John Marsland-Roberts, TD</i>	a Director <i>Citizen and Information Technologist</i> <i>Citizen and Carman</i>	Freshwater Bay, Isle of Wight
<b>Lee Gavin Henry</b> <i>David James Sales</i> <i>Nicholas James Redgrove</i>	an Insurance Underwriter <i>Citizen and Insurer</i> <i>Citizen and Insurer</i>	Rochford, Essex
<b>Simon Jocelyn Enoch</b> <i>Michael Steele Keith Grant</i> <i>Patrick John Marsland-Roberts, TD</i>	a Solicitor <i>Citizen and Information Technologist</i> <i>Citizen and Carman</i>	Fulham, London
<b>Barry Matthews</b> <i>Donald Howard Coombe, MBE</i> <i>Richard Howard Coombe</i>	a Chief Executive Officer <i>Citizen and Poulter</i> <i>Citizen and Poulter</i>	Eltham, London
<b>David Samuel Jones</b> <i>Michael Steele Keith Grant</i> <i>David Bilsland Cobb, CBE</i>	an Insurance Broker <i>Citizen and Information Technologist</i> <i>Citizen and Shipwright</i>	Putney, London
<b>Andrew Buchanan McGregor</b> <i>Michael Steele Keith Grant</i> <i>Patrick John Marsland-Roberts, TD</i>	an Engineering Company Director <i>Citizen and Information Technologist</i> <i>Citizen and Carman</i>	St Albans, Hertfordshire
<b>Simon Mark Watson</b> <i>Michael Steele Keith Grant</i> <i>Charles Justin Hugheston-Roberts</i>	a Telecommunications Consultant <i>Citizen and Information Technologist</i> <i>Citizen and Cook</i>	King's Lynn, Norfolk
<b>Martin Kenneth Kerslake</b> <i>Michael Steele Keith Grant</i> <i>David Henry Clifton Griffiths</i>	an Energy Consultancy Director <i>Citizen and Information Technologist</i> <i>Citizen and Farrier</i>	West Wickham, Cambridgeshire
<b>Derek Mackinlay</b> <i>Michael Steele Keith Grant</i> <i>Richard George Clerk Thornton, TD</i>	a Financial Adviser <i>Citizen and Information Technologist</i> <i>Citizen and Leatherseller</i>	Reigate, Surrey
<b>Victor Graham Annells</b> <i>The Rt Hon. The Lord Mayor</i> <i>Peter Kenneth Estlin, Ald.</i>	The Executive Director of Mansion House <i>Citizen and International Banker</i>	Harold Wood, Essex
<b>His Excellency Muyeba Shichapwa Chikonde</b> <i>Mark Watson-Gandy</i> <i>James Alastair Christian Watson-Gandy</i>	The High Commissioner of Zambia <i>Citizen and Scrivener</i> <i>Citizen and Pattenmaker</i>	Kensington, London
<b>Sir Thomas Richard Troubridge, Bt</b> <i>The Rt Hon. The Lord Mayor</i> <i>Peter Kenneth Estlin, Ald.</i>	a Chartered Accountant <i>Citizen and International Banker</i>	Fulham, London

<b>Wg Cdr John Ian Chappell, MBE</b> <i>The Rt Hon. The Lord Mayor</i> <i>Peter Kenneth Estlin, Ald.</i>	a Royal Air Force Officer  <i>Citizen and International Banker</i>	Elton, Cambridgeshire
<b>Charlotte Louise Benham Crosswell</b> <i>The Rt Hon. The Lord Mayor</i> <i>Peter Kenneth Estlin, Ald.</i>	a Finance Industry Membership Body CEO  <i>Citizen and International Banker</i>	Fulham, London
<b>Alastair David Lukies, CBE</b> <i>The Rt Hon. The Lord Mayor</i> <i>Peter Kenneth Estlin, Ald.</i>	an Entrepreneur  <i>Citizen and International Banker</i>	Bermondsey, London
<b>The Rt Hon. The Lord Geidt, Christopher Edward Wollaston Mackenzie Geidt, GCB, GCVO, OBE, QSO</b> <i>The Rt Hon. The Lord Mayor</i> <i>Catherine Sidony McGuinness, Deputy</i>	a Member of the House of Lords  <i>Citizen and Solicitor</i>	Isle of Lewis, Scotland
<b>Grace Elizabeth Kemball Bowman</b> <i>The Rt Hon. The Lord Mayor</i> <i>Timothy Russell Hailes, JP, Ald.</i>	a Student  <i>Citizen and International Banker</i>	Tostock, Suffolk
<b>Omar Ali</b> <i>The Rt Hon. The Lord Mayor</i> <i>Peter Kenneth Estlin, Ald.</i>	a Management Consultant  <i>Citizen and International Banker</i>	Richmond, Surrey
<b>Air Marshal Michael Wigston, CBE</b> <i>The Rt Hon. The Lord Mayor</i> <i>Peter Kenneth Estlin, Ald.</i>	a Royal Air Force Officer  <i>Citizen and International Banker</i>	High Wycombe, Buckinghamshire

Read.

*Resolved* – That this Court doth hereby assent to the admission of the said persons to the Freedom of this City by Redemption upon the terms and in the manner mentioned in the several Resolutions of this Court, and it is hereby ordered that the Chamberlain do admit them severally to their Freedom accordingly.

13.  
Legislation

The Court received a report on measures introduced by Parliament which might have an effect on the services provided by the City Corporation as follows:-

### **Statutory Instruments**

### **Date in Force**

**The Police and Firefighters' Pensions (Amendment) Regulations 2018 S.I. No. 997** 8 October 2018

The Regulations make amendments to various instruments relating to pensions payable in respect of police officers, including the removal of the requirement for a deceased member and the surviving partner of that member to have completed a nomination form before a survivor's pension can be paid. This requirement was held by the Supreme Court to constitute unjustified discrimination giving rise to a breach of the European Convention on Human Rights. The Regulations apply

to the Common Council in its capacity as a police authority.

*(The text of the measures and the explanatory notes may be obtained from the Remembrancer's Office.)*

14. Ballot  
Results

The Town Clerk reported the result of a ballot taken at the last Court, as follows:-

One Member to the **Investment Committee**.

	Votes
*John Douglas Chapman	49
Michael Hudson	40

Read.

Whereupon the Lord Mayor declared John Chapman to be appointed to the Investment Committee.

15.  
Appointments

The Court proceeded to consider appointments to the following Committees and outside bodies:-

- (A) One Member on the **Culture, Heritage and Libraries Committee**, for the balance of a term expiring in April 2019

**Nominations received:-**

Mary Durcan

Read.

Whereupon the Lord Mayor declared Mary Durcan to be appointed to the Culture, Heritage and Libraries Committee.

- (B) Four Members on the **Community and Children's Services Committee** for the balance of terms expiring in April 2019.

**Nominations received:-**

Natasha Lloyd-Owen

Read.

Whereupon the Lord Mayor declared Natasha Lloyd-Owen to be appointed to the Community and Children's Services Committee.

- (C) Three Members on the **Bridewell Royal Hospital**, for the balance of terms expiring in October 2024.

**Nominations received:-**

Richard Regan, O.B.E, Deputy

Read.

Whereupon the Lord Mayor declared Deputy Richard Regan to be appointed to the Bridewell Royal Hospital

#### 16. Questions

*Hughes-Penney,  
R, Ald. to the  
Chairman of the  
Investment  
Committee*

#### **Management of Financial Investments**

Alderman Robert Hughes-Penney asked a question of the Chairman of the Investment Committee concerning the level of engagement with the City Corporation's fund managers to ensure best practice was being adopted and followed.

Responding, the Chairman explained that the Financial Investment Board of the Investment Committee had been actively engaged in developing a Responsible Investment Policy and a Statement of Commitment to the UK Stewardship Code, with guidance from the City Corporation's investment consultant, Mercer. The UK Stewardship Code sought to ensure that assets owners held their managers to account for their activities and best practice would look for this to be reported on an annual basis. The Board had also signed up to the Principles of Responsible Investment which focused on incorporating Environmental, Social and Governance issues into investment practice. A review of the current fund managers had taken place and would be repeated on an annual basis, which would serve as a reminder to the fund managers that this area was a priority for the City Corporation.

In response to a supplementary question from Alderman Hughes-Penney concerning the implementation of the United Nation's Sustainable Development Goals, the Chairman explained that the City Corporation had already contributed by launching its Sustainable Development Capital Initiative at the recent UN General Assembly Conference. This would have the benefit of encouraging increased private investment in developing markets and in strengthening the City of London's position as a hub for initiatives and transactions. The Investment Committee would, as the UN's Sustainable Goals started to take shape, endeavour to absorb these and encourage the investment managers to incorporate them into their approach.

*Mead, W., O.B.E.;  
to the Chairman  
of the Planning  
and  
Transportation  
Committee.*

#### **Construction works and the impact on traffic**

Wendy Mead asked a question of the Chairman of the Planning and Transportation Committee requesting an update on the construction work taking place in relation to the Thames Tideway Tunnel and its impact on traffic movement along the Embankment.

In response, the Chairman advised Members that Tideway had previously proposed a full closure of the Embankment for six months to carry out gas works. However, following pressure from both Members and Officers regarding the consequences of this approach, Tideway had made significant changes to their design which would no longer require the closure of the Embankment. Whilst their decision required final confirmation, Tideway had suspended all advance work planned for the diversion.

Wendy Mead thanked the Chairman for his response and his efforts on this issue, noting that this was good news for residents and businesses. In reply to a supplementary question from Mrs Mead, the Chairman confirmed that the Bloomberg building had been awarded the 2018 RIBA Stirling Prize, partly in



recognition of it being is the world's most sustainable office with a host of features for reducing water, energy consumption, and CO2 emissions. The development's success illustrated the contribution made by City Corporation's Officers drawing on the District Surveyors' experience of large commercial projects, from inception to occupation, and the Chairman congratulated all those involved.

*Harrower, G.: to  
the Chairman of  
the Standards  
Committee*

### **Standards Committee proceedings**

Graeme Harrower asked a question of the Chairman of the Standards Committee which made reference to a memorandum which he had circulated to all Members of the Court of Common Council. The memorandum had highlighted his concerns relating to a number of elements of the Standards Regime and suggested the submission of a Motion seeking their amendment.

The Chairman, replying, explained that the City Corporation had a statutory duty to promote and maintain high standards of conduct by Members and co-opted Members and must have a Code of Conduct and arrangements in place under which allegations could be investigated and decisions made. The Standards Committee, through its various sub-committees, had the duty to fulfil these responsibilities on behalf of the Court of Common Council.

With regard to the particular case referred to, the Chairman stated that he had no doubt it had been properly and fairly handled in line with the arrangements laid down by the Court of Common Council. He added his belief that the Members of the Sub-Committees which had considered the case had fulfilled their responsibilities and exercised their judgement with integrity. The Chairman also suggested that he did not consider it appropriate, nor equitable, for a decision made under such delegated arrangements to be discussed by the full Court.

The Chairman noted that new arrangements had recently been introduced by the Court of Common Council for cases considered by the Standards Committee, but the referred to case, due to timings, had been dealt with under the old procedures.

Responding to a supplementary question from Mr Harrower asking whether a new approach should be considered at the December meeting of the Court of Common Council, the Chairman explained that he did not think this would be helpful.

In response to a further supplementary question from Deputy Brian Mooney concerning the handling of the particular case in question, the Chairman reiterated his earlier comments and belief that the proper procedures had been followed.

### **17. Motions**

*Scott, J.G.S.,  
J.P.; Ingham  
Clark R.J. Deputy*

**Resolved** – That James de Sausmarez be appointed to the Culture Heritage and Libraries Committee for the Ward of Candlewick, in the room of Kevin Everett; and that Kevin Everett be appointed to the Finance Committee, also for the Ward of Candlewick, in the room of James de Sausmarez.

*Scott, J.G.S.,  
J.P.; Ingham  
Clark R.J. Deputy*

**Resolved** – That Natasha Lloyd-Owen be appointed to the Planning and Transportation Committee for the Ward of Castle Baynard, in the room of Alderman Emma Edhem (who no longer represented the Ward).

*Scott, J.G.S.,*

**Resolved** - That Christopher Hill be appointed to the Finance Committee for the

J.P.; Ingham  
Clark R.J. Deputy

Ward of Farringdon Within, in the room of Karina Dostalova.

18. Awards &  
Prizes

The Court received a report of the Chairman of the City Bridge Trust advising of the receipt by the Trust of a Charity Times Award for its Stepping Stones Fund, which provided grants to charities and social enterprises seeking to explore the social investment market.

19.

**HOSPITALITY WORKING PARTY OF THE POLICY AND RESOURCES COMMITTEE**

**(John George Stewart Scott, J.P., Chief Commoner)**

11 September 2018

**(A) Local Government Association – Culture, Tourism and Sports Conference Dinner**

The Local Government Association (LGA) is the national membership body for over 400 local authorities in England and Wales. The City Corporation had been a member of the LGA since its inception in 1997, with it being a valuable source of information and best practice and all Members of Common Council having access to its services.

The LGA was holding a conference on Culture, Tourism and Sport in London on 5-6 March 2019 and it was proposed that the City Corporation host a dinner at the end of the first day of the conference. The second day of the conference was to take place at Guildhall.

It was therefore **recommended** that hospitality be granted for a dinner and that arrangements are made under the auspices of the Policy and Resources Committee; the costs to be met from City's Cash and within approved parameters.

*Resolved* – That hospitality be granted for a dinner with arrangements to be made under the auspices of the Policy and Resources Committee; the costs to be met from City's Cash and within the approved parameters.

**(B) Report of Urgent Action Taken: Breakfast for the King and Queen of the Netherlands**

At the invitation of Her Majesty The Queen, His Majesty King Willem-Alexander of the Netherlands, accompanied by Her Majesty Queen Maxima, was to pay a two-day State Visit to the United Kingdom in October 2018. The Visit was to be much shorter than previous State Visits; however, notwithstanding this, the City Corporation had sought to make a substantial contribution to the programme.

Following the decision of Hospitality Working Party to recommend hospitality, it became evident that waiting until the meeting of the Court of Common Council on 18 October 2018 for a decision would not allow sufficient time for arrangements to be put in place for this event. Approval was therefore sought and obtained under urgency procedures for hospitality to be granted for a breakfast at Mansion House with arrangements to be made under the auspices of the Hospitality Working Party; the costs to be met from City's Cash and within the approved parameters.

*Resolved* – That the action taken under urgency procedures be noted.

**(C) Report of Urgent Action Taken: Tokyo Metropolitan Government Dinner**

A delegation from Tokyo Metropolitan Government was due to visit the UK between 30 October and 1 November 2018. The purpose of the visit was to further engagement between Japan and the UK, focusing on developing trading and business relations. In December 2017, the City Corporation signed a MoU with the Tokyo Metropolitan Government to support Tokyo's ambition to become a global financial centre and it was proposed that the delegation be invited to attend a dinner coinciding with the visit.

Following the decision of the Hospitality Working Party to recommend hospitality, it became evident that waiting until the meeting of the Court of Common Council on 18 October 2018 for a decision would not allow sufficient time for arrangements to be put in place for this event. Approval was therefore sought and obtained under urgency procedures for hospitality to be granted with arrangements to be made under the auspices of the Public Relations and Economic Development Sub Committee; the costs to be met from City's Cash and within the approved parameters.

*Resolved* – That the action taken under urgency procedures be noted.

20.

**FINANCE COMMITTEE**

**(Jeremy Mayhew)**

13 August 2018

**Report of Urgent Action Taken: Provision of Energy (Electricity and Gas) Supplies – Contract Award**

The Court received a report advising of action taken under urgency procedures concerning the award of a contract for the provision of electricity and gas supplies.

Following the Finance Committee's approval of a procurement strategy for the tender of electricity and gas supplies for all City of London Corporation sites, a procurement exercise was undertaken. Through this process, Total Gas and Power was identified as the preferred supplier for all areas of supply, at an approximate total cost of £15.5m per annum. As the existing contract was due to expire in September 2018, approval was sought and obtained under urgency procedures to:-

- Awarding a three-year contract for Lot 1 (Supply of Electricity, Half Hourly and Non-Half Hourly, Flexible Purchase), commencing 1st October 2018, to Total Gas and Power Ltd at an estimated cost of £10.9m per annum.
- Awarding a three-year contract for Lot 2 (Supply of Gas, Flexible Purchase), commencing 1st October 2018, to Total Gas and Power Ltd at an estimated cost of £1.11m per annum.
- Awarding a two-year contract for Lot 3 (Supply of Electricity, Half Hourly and Non-Half Hourly, Fixed Price term), commencing 1st October 2018, to Total Gas and Power Ltd at an estimated cost of £3.12m per annum.

- Awarding a two-year contract for Lot 4 (Supply of Gas, Fixed Price term), commencing 1st October 2018, to Total Gas and Power at an estimated cost of £370k per annum.
- Delegating to the Procurement Sub-Committee, on behalf of the Finance Committee, the right to exercise options to extend the contract by up to two years as permitted in the contract terms.

*Resolved* – That the action taken under urgency procedures be noted.

21.

## **PLANNING AND TRANSPORTATION COMMITTEE**

**(Christopher Hayward)**

11 September 2018

### **(A) Adoption of the City Lighting Strategy**

The Court considered a report which **recommended** the adoption of a City Lighting Strategy following a public consultation process. The Strategy was intended to improve the quality, efficiency, sustainability and consistency of lighting for the whole City, providing a holistic approach to lighting and helping to ensure a safe, vibrant and pleasant night environment for businesses, residents and visitors.

In response to a question from Sir Michael Snyder concerning costs, the Chairman of the Planning and Transportation Committee explained that it would cost £2m to deliver the technical upgrades and a further £5m to implement the Lighting Strategy. He also took the opportunity to add that it would cost £15-20m over ten years to deliver the Culture Look and Feel Strategy set out at Item 21(B) in the agenda.

*Resolved* – That the City Lighting Strategy document be approved and the development of a Planning guidance document to contribute to the achievement of the Strategy's vision be noted.

11 September 2018

### **(B) Culture Mile Look and Feel Strategy: Adoption of the Strategy**

The Court considered a report which **recommended** the adoption of a Culture Mile Look and Feel Strategy following a public consultation process. The Strategy proposed a series of environmental enhancements and other projects and approaches to improve the area, in support of the Culture Mile initiative.

*Resolved* – That the Culture Mile Look and Feel Strategy, and the Detailed Delivery Plan, be adopted.

22.

## **AUDIT AND RISK MANAGEMENT COMMITTEE**

**(Ian David Luder, J.P., Alderman)**

25 September 2018

### **Re-appointment of External Member**

At its meeting of 16 January 2014, the Court agreed to vary the procedure for the appointment of External Members to the Audit and Risk Management Committee in order to allow them to be appointed for three terms, with two being the norm. Ms Hilary Daniels has served on the Committee as an External Member since its

inception in 2011, and her contributions to the Committee and the Auditor Appointment Panel have been invaluable, furthermore, Ms Daniels was appointed as the Audit and Risk Management's Committee first External Chairman, the Court is therefore **recommended** to re-appoint Ms Daniels for a third three-year term to the Audit and Risk Management Committee.

*Resolved* – That approval be given to the appointment of Ms Hilary Daniels to the Audit and Risk Management Committee for a third term, expiring in 2022.

23.  
Scott, J.G.S.,  
J.P.; Ingham  
Clark R.J. Deputy

*Resolved* – that the public be excluded from the meeting for the following items of business below on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act, 1972.

**Summary of exempt items considered whilst the public were excluded:-**

24. *Resolved* – That the non-public minutes of the last Court are correctly recorded.

25. **Policy and Resources Committee**

The Court considered action taken under urgency procedures relating to a first stage bid for the Barking Power Station site as part of the Markets Consolidation Programme.

26. **Property Investment Board**

The Court considered action taken under urgency procedures relating to a disposal of a 150 year lease for Bridge House Estates, 1-5 London Wall Buildings.

**The meeting commenced at 1.00 pm and ended at 1.55 pm**

**BARRADELL.**

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## Resolution of Thanks to the Late Lord Mayor – *by Elizabeth Rogula, Deputy*

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons of the  
City of London in Common Council assembled.*

### **Motion:-**

“My Lord Mayor,

I move that the Members of this Court take great pleasure in expressing to:

### **ALDERMAN CHARLES EDWARD BECK BOWMAN**

their sincere thanks and appreciation for the distinguished manner in which he has served as Lord Mayor of the City of London during the past year.

Always enthusiastic and good-humoured, Charles has travelled extensively and visited more than 25 countries and six of the seven continents. From the Americas, Asia and Africa to the World Economic Forum at Davos, as Lord Mayor he has worked tirelessly as a passionate advocate on behalf of the UK's financial and professional sectors.

Charles' Mayoral theme, the Business of Trust, has sought to create better business trusted by society. The programme has been shared with influential stakeholders across the City and beyond. Through Charles' initiative to create and improve the programme, he has ensured that this important and necessary work will continue to thrive in the future. Furthermore, thanks to his personal efforts, the relationship between the Mayoralty and Department of International Trade is closer than ever, with the Lord Mayor having a place on the Board of Trade.

During his time as Lord Mayor, Charles has hosted many special events to further economic diplomacy and promote London as a centre for business. The Commonwealth Business Forum was a particular success, at which Charles hosted one President and four Prime Ministers amongst others. It succeeded in strengthening further the developing bonds with the Commonwealth.

We on the Court also wish to pay tribute to Samantha, the Lady Mayoress, who had an equally busy and energetic programme. A myriad of activities including sponsored swims and karaoke, and the ever-present promise of

sheep being introduced to Mansion House, ensured that the year went by like Greased Lightning. We express our gratitude for all her contributions.

In taking their leave of Charles, their 690th Lord Mayor, Honourable Members reflect that his has been a special and outstanding Mayoralty. We trust that Charles, Samantha, Grace and Charlotte will look back on a unique year with the greatest pleasure, pride, and many happy recollections.

My Lord Mayor.”





## List of Applications for the Freedom

*To be presented on Thursday, 6th December, 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons of  
the City of London in Common Council assembled.*

Set out below is the Chamberlain's list of applicants for the Freedom of the City together with the names, etc. of those nominating them.

<b>Richard John Carpenter</b> <i>Kevin Joseph Milner</i> <i>Colin Anthony Hart</i>	a Teacher <i>Citizen and Chartered Secretary &amp; Administrator</i> <i>Citizen and Broderer</i>	Loughborough, Leicestershire
<b>Dr Reza Shams Dilmaghani</b> <i>Dr Amin Latif</i> <i>Abdul Latif</i>	a Principal Data Scientist <i>Citizen and Poulter</i> <i>Citizen and Poulter</i>	Barnet
<b>Dr Oliver Damian Holland</b> <i>Dr Amin Latif</i> <i>Abdul Latif</i>	a Research Scientist <i>Citizen and Poulter</i> <i>Citizen and Poulter</i>	Islington
<b>John Kenneth Brown</b> <i>Michael Richard Adkins</i> <i>Stanley Brown, QGM, TD</i>	a Solicitor, retired <i>Citizen and Water Conservator</i> <i>Citizen and Loriner</i>	High Wycombe, Buckinghamshire
<b>Leslie John Ford</b> <i>Robert Kerr Dobbie</i> <i>Nicholas John Burger</i>	an Accountant <i>Citizen and Cutler</i> <i>Citizen and Cutler</i>	Laleham, Staines-Upon Thames, Surrey
<b>Graham Richard O'Geran</b> <i>Christopher James Caine</i> <i>Alan Robert Brumwell</i>	a Global Business Development Director <i>Citizen and Maker of Playing Cards</i> <i>Citizen and Plumber</i>	Billericay, Essex
<b>Professor Antony Ajay Pall Narula</b> <i>Michael Peter Cawston</i> <i>Augustus Philip Jude Machado</i>	a Consultant Surgeon <i>Citizen and Tyler and Bricklayer</i> <i>Citizen and Information Technologist</i>	Wargrave, Berkshire
<b>Veronique Helen Rapetti</b> <i>Mark Anthony Grove</i> <i>Jean Deillon</i>	a Learning & Partnership Programme Director <i>Citizen and Cook</i> <i>Citizen and Distiller</i>	Wembley, Middlesex
<b>Barbara Joan Hughes</b> <i>Ian Donald Winton Robertson</i> <i>David John Hughes</i>	an Industrial Relations Officer, retired <i>Citizen &amp; Tallow Chandler</i> <i>Citizen and Engineer</i>	Prestbury, Cheshire

<b>Timothy Peter Glavin</b> <i>Anthony William Parker</i> <i>Brian John Rawles</i>	a Master Carver, retired <i>Citizen and Glass Seller</i> <i>Citizen and Glass Seller</i>	Welling, Kent
<b>Colonel Anthony William Heath</b> <i>Peter Kenneth Estlin, Ald</i> <i>William Anthony Bowater Russell, Ald.</i>	a Defence Trade & Investment Director <i>Citizen and International Banker</i> <i>Citizen and Haberdasher</i>	Chiswick
<b>David John Crane</b> <i>David Herbert</i> <i>Stephen Barry Braund</i>	a Travel & Event Company Director, retired <i>Citizen and Basketmaker</i> <i>Citizen and Joiners &amp; Ceiler</i>	Petersfield, Hampshire
<b>Joanna Cargill Crane</b> <i>David Herbert</i> <i>Stephen Barry Braund</i>	a Banker, retired <i>Citizen and Basketmaker</i> <i>Citizen and Joiners &amp; Ceiler</i>	Petersfield, Hampshire
<b>Joanna Louise Mearing</b> <i>Wendy Mead, OBE, CC</i> <i>Marianne Bernadette Fredericks, CC</i>	an Office Manager <i>Citizen and Glover</i> <i>Citizen and Baker</i>	Tower Hamlets
<b>Matthew John Pryme</b> <i>Wendy Mead, OBE, CC</i> <i>Marianne Bernadette Fredericks, CC</i>	a Yeoman Warder <i>Citizen and Glover</i> <i>Citizen and Baker</i>	Tower Hamlets
<b>John Stephen Donald</b> <i>Wendy Mead, OBE, CC</i> <i>Marianne Bernadette Fredericks, CC</i>	a Yeoman Warder <i>Citizen and Glover</i> <i>Citizen and Baker</i>	Tower Hamlets
<b>Alexander George Fergusson</b> <i>Alan Roy Willis</i> <i>Paul Christian Jensen</i>	a Real Estate Developer <i>Citizen and Baker</i> <i>Citizen and Baker</i>	Camden
<b>Peter Shand Walker</b> <i>David Alastair Morgan-Hewitt</i> <i>Philippe Roland Rossiter</i>	a Hotel General Manager <i>Citizen and Innholder</i> <i>Citizen and Innholder</i>	Tarves, Aberdeenshire, Scotland
<b>Dr Geoffrey Bernard Card</b> <i>Terry Kenneth Morris</i> <i>David Roger Anthony John Formosa</i>	a Chartered Civil Engineer <i>Citizen and Pewterer</i> <i>Citizen and Fruiterer</i>	Pulborough, West Sussex
<b>Matthew Paul Christensen</b> <i>Anthony Ben Charlwood</i> <i>Donald Newell</i>	an Asset Management Company Director <i>Citizen and Basketmaker</i> <i>Citizen and Pattenmaker</i>	Paris, France
<b>Keith Mark Digby</b> <i>Peter Richard Cowland</i> <i>Trevor Charles Barnwell</i>	a Fire Officer <i>Citizen and Firefighter</i> <i>Citizen and Firefighter</i>	Stotfold, Hitchin, Hertfordshire
<b>Robert Spence</b> <i>Simon Peter McIlwaine</i> <i>Stephen Robert Kenneth Nimmons</i>	a Soldier <i>Citizen and Clockmaker</i> <i>Citizen and Framework Knitter</i>	Westminster
<b>Tukeer Hussain</b> <i>James Alastair Christian Watson-Gandy</i> <i>Captain Maurice Jacques Blaber</i>	a Banker <i>Citizen and Pattenmaker</i> <i>Citizen and Currier</i>	Moseley, Birmingham, West Midlands

<b>Mikis Almanov</b> <i>John Leslie Barber</i> <i>Robert Adrian Joseph</i> <i>Waddingham, CBE</i>	a Property Development Company Director <i>Citizen and Blacksmith</i> <i>Citizen and Actuary</i>	Greenford, Perivale
<b>Rebecca Elizabeth Willis</b> <i>Roger Arthur Holden Chadwick,</i> <i>OBE, Deputy</i> <i>Philip Woodhouse, Deputy</i>	a Teacher <i>Citizen and Bowyer</i>  <i>Citizen and Grocer</i>	Redhill, Surrey
<b>Stephen Robert Cannon, MBE</b> <i>Robert Adrian Joseph</i> <i>Waddingham, CBE</i> <i>Peter Reginald Allcard</i>	a Consultant Orthopaedic Surgeon  <i>Citizen and Actuary</i>  <i>Citizen and Blacksmith</i>	Chalfont St Giles, Buckinghamshire
<b>Lucy Emma Wheatley-Coles</b> <i>Stanley Brown, QGM, TD</i> <i>Graham John Peacock</i>	a Regalia Company Director <i>Citizen and Loriner</i> <i>Citizen and Loriner</i>	Chichester, West Sussex
<b>Mark David Tweedie</b> <i>Timothy Russell Hailes, Ald, JP.</i> <i>Charles Edward Lord, OBE, JP,</i> <i>CC</i>	a Banker <i>Citizen and International Banker</i> <i>Citizen and Broderer</i>	Thames Ditton, Surrey
<b>Karen Louise Sales</b> <i>David James Sales</i> <i>Nicholas James Redgrove</i>	a Beautician <i>Citizen and Insurer</i> <i>Citizen and Insurer</i>	Rochford, Essex
<b>Elizabeth Anne Spill</b>  <i>Mr Iain Reid</i> <i>Richard Stuart Goddard</i>	a Barrister-at-Law, retired  <i>Citizen and Educator</i> <i>Citizen and Shipwright</i>	Henley-on-Thames, Oxon, Oxfordshire
<b>Emmanuel Bushayija</b> <i>Frederick Joseph Trowman</i> <i>David Robert Boston</i>	a Security Company Director <i>Citizen and Loriner</i> <i>Citizen and Gold and Silver Wyre Drawer</i>	Sale, Manchester
<b>Richard Paul Lowe</b> <i>Peter Lionel Raleigh Hewitt,</i> <i>Alastair John Naisbitt King,</i> <i>Deputy</i>	a Licencing Company Director <i>Citizen and Woolman</i> <i>Citizen and Blacksmith</i>	Marylebone
<b>Maximilian David Jonathan Llistosella Y Bischoff</b> <i>Timothy Russell Hailes, Ald, JP.</i> <i>Fiona Josephine Adler</i>	a Commercial Executive  <i>Citizen and International Banker</i> <i>Citizen and Tobacco Pipe Maker</i>	Soho
<b>Richard Michael Puttock</b> <i>John Alexander Smail</i> <i>Mrs Elizabeth A Thornborough</i>	an Operations Manager <i>Citizen and Distiller</i> <i>Citizen and Upholder</i>	Ferndown, Dorset
<b>Carol Patricia Coyte Lawrence</b> <i>Alan Robert Brumwell</i> <i>Christopher James Caine</i>	a Funeral Director  <i>Citizen and Plumber</i> <i>Citizen and Maker of Playing Cards</i>	Crowborough, East Sussex
<b>Peter John Bearman</b> <i>Sir Andrew Charles Parmley, Ald.</i> <i>Jonathan Patterson Shiels</i>	an Engineering Fitter & Turner, retired <i>Citizen and Musician</i> <i>Citizen and Joiner</i>	Gravesend, Kent

<b>James Alfred Daniels</b> <i>Jonathan Patterson Shiels</i> <i>Sir Andrew Charles Parmley, Ald.</i>	a Managing Director, retired <i>Citizen and Joiner</i> <i>Citizen and Musician</i>	Cuxton, Kent
<b>Craig Paul Haslam</b> <i>Jonathan Martin Averbs</i> <i>Colin Richard Buttery</i>	a Chief Superintendent <i>Citizen and Fletcher</i> <i>Citizen and Gardener</i>	Enfield, Middlesex
<b>Rev. Michael Robert Jarman</b> <i>Lawrence John Day</i> <i>Mervyn Doreen Redding</i>	a Clerk in Holy Orders <i>Citizen and Maker of Playing Cards</i> <i>Citizen and Basketmaker</i>	Newport, Monmouthshire
<b>Matthew Edward Mowels</b> <i>Harold Ebenezer Piggott</i> <i>Paul Stephen Hollebone</i>	a Technical Consultant <i>Citizen and Basketmaker</i> <i>Citizen and Chartered Accountant</i>	Littlehampton, Sussex
<b>Keith Charles Aris</b> <i>Trevor James Brignall</i> <i>Trevor Ford</i>	a Local Government Officer <i>Citizen and Marketor</i> <i>Citizen and Security Professional</i>	Molesey, Surrey
<b>Paul William Jackson</b> <i>Dominic Gerard Christian</i> <i>Michael Edward Cutting</i>	a Charitable Group Chief Executive <i>Citizen and Insurer</i> <i>Citizen and Glover</i>	Bookham, Surrey
<b>Susan Laura Apter</b> <i>Paul Anthony Denley Williams</i> <i>Simon John Louis Linford</i>	a Local Government Officer <i>Citizen and Bowyer</i> <i>Citizen and Bowyer</i>	Woking, Surrey
<b>Geoffrey Stephen Williams</b>  <i>Alan Montague Ware, MBE</i> <i>John Walter William Argent</i>	a Farming Company Director  <i>Citizen and Gold and Silver Wyre Drawer</i> <i>Citizen and Painter Stainer</i>	Eaton Bray, Dunstable, Bedfordshire
<b>Mrs Shobha Earl</b> <i>John Alexander Smail</i> <i>Air Commodore Richard Skene</i> <i>Peacock-Edwards, CBE, AFC</i>	a Royal Air Force Warrant Officer <i>Citizen and Distiller</i> <i>Citizen and Air Pilot and Air Navigator</i>	Hadleigh, Suffolk
<b>Dorothy Rose Purdew, OBE</b> <i>James Alastair Christian Watson-Gandy</i> <i>Mark Watson-Gandy</i>	a Spa Resort Company Chairman <i>Citizen and Pattenmaker</i>  <i>Citizen and Scrivener</i>	Henlow, Bedfordshire
<b>Flavia Rosamunda Burston</b> <i>Simon Oakley Fradd</i> <i>Graham Brown</i>	a Ballet Dancer, retired <i>Citizen &amp; Needlemaker</i> <i>Citizen and Needlemaker</i>	Southwark
<b>Mark Clive Barter</b>  <i>Keith David Forbes Bottomley, Deputy</i> <i>Christopher Michael Hayward, CC</i>	an Information Technology Manager, retired <i>Citizen and Wheelwright</i>  <i>Citizen and Pattenmaker</i>	Sutton, Surrey
<b>Sara Poldaaas</b> <i>Christopher Michael Thierry</i> <i>William John Hudson Clark</i>	a Head of Investment Operations <i>Citizen and Woolman</i> <i>Citizen and Woolman</i>	Calgary, Alberta, Canada
<b>Nicholas Simon Thierry</b> <i>Christopher Michael Thierry</i> <i>William John Hudson Clark</i>	a Graphic Designer <i>Citizen and Woolman</i> <i>Citizen and Woolman</i>	Calgary, Alberta, Canada

<b>Eileen Cunningham</b> <i>Joyce Carruthers Nash, OBE, Deputy Barbara Patricia Newman, CBE, CC</i>	a Local Government Officer <i>Citizen and Feltmaker  Citizen and Turner</i>	Southwark
<b>Graham Martin Pettit</b> <i>David Benjamin Morris Graham Leslie Flight</i>	a Banking Consultant <i>Citizen and Solicitor Citizen &amp; Loriner</i>	Bishops Stortford, Hertfordshire
<b>David Morrison</b> <i>Robert Mason David Robert Attwood</i>	a Banker, retired <i>Citizen and Plumber Citizen and Plumber</i>	Ingatestone, Essex
<b>Kristi Jade Benson</b> <i>Wendy Mead, OBE, CC Marianne Bernadette Fredericks, CC</i>	a Croupier <i>Citizen and Glover Citizen and Baker</i>	Tower Hill, Tower Hamlets
<b>Daniel Benson</b> <i>Wendy Mead, OBE, CC Marianne Bernadette Fredericks, CC</i>	a Yeoman Warder <i>Citizen and Glover Citizen and Baker</i>	Tower Hill, Tower Hamlets
<b>Tina Adlam</b> <i>David Harris  Captain Philip Hanton</i>	a City of London Guide <i>Citizen and Stationers &amp; Newspaper Makers Citizen and Master Mariner</i>	Southend On Sea, Essex
<b>Sean Richard Garvey</b> <i>Alison Taylor West  Michael Ernest Saunders</i>	a Project Manager <i>Citizen and Chartered Secretaries &amp; Administrator Citizen and Hackney Carriage Driver</i>	Chingford
<b>Daniel James Beresford</b> <i>Sarah Jane Fletcher Harris Mark John Herbage</i>	a Recruiter <i>Citizen and Basketmaker Citizen and Cook</i>	Wanstead
<b>Patrick James Honey</b> <i>Guy Fairbank Captain Philip Hanton</i>	an Engineer, retired <i>Citizen and Vinter Citizen and Master Mariner</i>	Dagenham, Essex
<b>Robert Jonathan Eyres</b> <i>Robert Adrian Joseph Waddingham, CBE Peter Reginald Allcard</i>	an Information Technology Co. Director, retired <i>Citizen and Actuary  Citizen and Blacksmith</i>	Amersham, Buckinghamshire
<b>Commodore David Graham Elford, OBE ADC RN</b> <i>Gordon Lenham Warren Lord Mountevans</i>	a Naval Officer <i>Citizen and Gold and Silver Wyre Drawer Citizen and Shipwright</i>	Whitford, Axminster, Devon
<b>Martin Kenneth Trott</b> <i>David John Marsh Agnes Mary McMorrough Kavanagh</i>	a Metal Broker <i>Citizen and Fanmaker Citizen and Blacksmith</i>	Billericay, Essex
<b>Sir Robert Andrew Wales</b> <i>John Leslie Barber Peter Reginald Allcard</i>	The Mayor of Newham, retired <i>Citizen and Blacksmith Citizen and Blacksmith</i>	Newham
<b>Simon James Rollinson</b> <i>Frederick Joseph Trowman Richard Charles Clinton Fynes</i>	a Highway Engineering Company Director <i>Citizen and Loriner Citizen &amp; Framework Knitter</i>	Church Langley, Harlow, Essex

<b>Graeme Anderson Kidd</b> <i>Mark Ian Henderson</i> <i>Keith Clark Brown</i>	a Stockbroker & Investment Manager, retired <i>Citizen and Currier</i> <i>Citizen and Cooper</i>	Kilmacolm, Renfrewshire, Scotland
<b>Christine Olga Bodycombe</b> <i>Mary Elizabeth Linington</i> <i>David Johnson</i>	an Educational Consultant, retired <i>Citizen and Educator</i> <i>Citizen and Management Consultant</i>	Bow
<b>Dr Sylvia Frances Edwards</b> <i>Jurgita Zilinskiene</i> <i>Barrie Buick Stewart</i>	a Clinical Research Fellow <i>Citizen and Fruiterer</i> <i>Citizen and Security Professional</i>	Woodford Green, Redbridge
<b>Baroness Doreen Delceita Lawrence</b> <i>John George Stewart Scott, CC</i> <i>Catherine Sidony McGuinness, Deputy</i>	a Member of the House of Lords  <i>Citizen and International Banker</i> <i>Citizen and Solicitor</i>	Bellingham
<b>David Scott Martinez</b> <i>Michael Thomas Saunders</i> <i>Keith Allen Sargent</i>	an Attorney <i>Citizen and Apothecary</i> <i>Citizen and Loriner</i>	Colorado, United States of America
<b>Mark Norman Huxley</b> <i>Peter Lionel Raleigh Hewitt</i> <i>Terence Rodney Masters</i>	a Business Advisory Company Director <i>Citizen and Woolman</i> <i>Citizen and Insurer</i>	Billericay, Essex
<b>Jeremy James Wall</b> <i>Jurgita Zilinskiene</i> <i>Barrie Buick Stewart</i>	an Engineering Operations Manager <i>Citizen and Fruiterer</i> <i>Citizen and Security Professional</i>	Woodford Green, Redbridge
<b>Matthew James Green</b> <i>Jurgita Zilinskiene</i> <i>Barrie Buick Stewart</i>	a Picture Restorer <i>Citizen and Fruiterer</i> <i>Citizen and Security Professional</i>	Maidstone, Kent
<b>Simon Benson</b> <i>Jurgita Zilinskiene</i> <i>Barrie Buick Stewart</i>	a Company Director <i>Citizen and Fruiterer</i> <i>Citizen and Security Professional</i>	Chorleywood, Hertfordshire
<b>The Right Honourable Jeremy Richard Streynsham Hunt, MP</b> <i>Jeremy Paul Mayhew, CC</i> <i>Catherine Sidony McGuinness, Deputy</i>	a Member of Parliament  <i>Citizen and Loriner</i> <i>Citizen and Solicitor</i>	Pimlico
<b>His Excellency Archbishop Edward Joseph Adams</b> <i>Stephen Decatur Haines, Deputy</i> <i>Catherine Sidony McGuinness, Deputy</i>	The Papal Nuncio  <i>Citizen and Pewterer</i> <i>Citizen and Solicitor</i>	Wimbledon
<b>Marie Bernadette Trainer</b> <i>Timothy Luke Fitzgerald-O'connor</i> <i>William Fitzgerald-O'connor</i>	a Museum Director, retired <i>Citizen and Gold and Silver Wyre Drawer</i> <i>Citizen and Gold and Silver Wyre Drawers</i>	Seattle, Washington State
<b>Amanda Christina Kate Griffiths-Lambeth</b> <i>Robert Picton Seymour Howard, Ald</i> <i>Alderman Susan Carol Langley, OBE, Ald</i>	a Human Resources Director  <i>Citizen and Gardener</i> <i>Citizen and Insurer</i>	Stockwell
<b>Nicola Sophia Farmer</b>	a Restaurateur	Flitwick, Bedfordshire

<i>Kevin Malcolm Everett, Deputy James De Sausmarez, CC</i>	<i>Citizen and Fletcher Citizen and Joiner and Ceiler</i>	
<b>Deborah Jane Woskow</b>  <i>Robert Picton Seymour Howard, Ald Alderman Susan Carol Langley, OBE, Ald</i>	a Businesswomen Networking Company Director <i>Citizen and Gardener  Citizen and Insurer</i>	Maida Vale
<b>Krystal Louise Miller</b> <i>Shravan Joshi, CC Jashvant Joshi</i>	a Communications Manager <i>Citizen and Fueller Citizen and Blacksmith</i>	Wimbledon
<b>Kirsten Keegan</b>  <i>Timothy Russell Hailes, Ald, JP. Robert Allan Merrett, Deputy</i>	a Solicitor  <i>Citizen and International Banker Citizen &amp; International Banker</i>	Sherfield On Loddon, Hampshire
<b>Fiona Jane Valerie Ida Beale</b>  <i>Elizabeth Rogula, Deputy John Douglas Chapman, CC</i>	a Chartered Surveyor  <i>Citizen and Common Councilman Citizen and Common Councilman</i>	Coupar Angus, Blairgowrie, Perthshire
<b>Angela Roach</b> <i>Jeremy Lewis Simons, CC Catherine Sidony McGuinness, Deputy</i>	a Local Government Officer <i>Citizen and Scientific Instrument Maker Citizen and Solicitor</i>	Downham, Bromley, Kent
<b>Sophie Timms</b> <i>James Richard Tumbridge, CC Roger Arthur Holden Chadwick, OBE, Deputy</i>	a Head of Corporate Affairs <i>Citizen and Common Councilman Citizen and Bowyer</i>	Sunbury-on-Thames
<b>Susannah Caroline Wilks</b> <i>Wendy Marilyn Hyde, Deputy Catherine Sidony McGuinness, Deputy</i>	an Urban Regeneration Director <i>Citizen and World Trader Citizen and Solicitor</i>	Clapham
<b>Kathryn Jill Cooper</b> <i>Air Commodore Richard Skene Peacock-Edwards, CBE, AFC Gerald Albert George Pulman, JP</i>	a Club Manager <i>Citizen and Air Pilot and Air Navigator  Citizen and Basketmaker</i>	Walthamstow
<b>Leula Habte</b> <i>John Tomlinson, Deputy Susan Jane Pearson, CC</i>	an Administrative Assistant <i>Citizen and Fletcher Citizen and Common Councilman</i>	Highams Park
<b>Dr. Margaret Challis</b> <i>Jeremy Lewis Simons, CC Catherine Sidony McGuinness, Deputy</i>	a Consultant Paediatrician, retired <i>Citizen and Scientific Instrument Maker Citizen and Solicitor</i>	Chorleywood, Hertfordshire
<b>Irem Yerdelen</b>  <i>Elizabeth Rogula, Deputy John Douglas Chapman, CC</i>	a Risk Management and Insurance Consultant <i>Citizen and Common Councilman Citizen and Common Councilman</i>	Finsbury Park
<b>Nausicaa Delfas</b> <i>Timothy Russell Hailes, Ald, JP. Robert Allan Merrett, Deputy</i>	an Executive Director <i>Citizen and International Banker Citizen &amp; International Banker</i>	Wimbledon
<b>Anne Elizabeth Mason</b> <i>Barbara Patricia Newman, CBE, CC Joyce Carruthers Nash, OBE, Deputy</i>	a Local Government Officer <i>Citizen and Turner  Citizen and Feltmaker</i>	Bromley, Kent

<b>Susan Ruth Calderwood</b> <i>Jonathan Martin Avern</i> <i>Thomas Sleigh, Deputy</i>	a Local Government Officer <i>Citizen and Fletcher</i> <i>Citizen and Common Councilman</i>	Sevenoaks, Kent
<b>Kristina Glenn</b> <i>John Tomlinson, Deputy</i> <i>Vivienne Littlechild, CC, JP</i>	a Charity Director <i>Citizen and Fletcher</i> <i>Citizen and Glover</i>	Hornsey
<b>Ms Paola Daniela Galley</b> <i>David John Bradshaw, Deputy</i> <i>Lesley Faith Bradshaw</i>	a Secretary <i>Citizen and Common Councilman</i> <i>Citizen and Cooper</i>	Purfleet, Essex
<b>Penelope Anne Miller</b> <i>Thomas Sleigh, Deputy</i> <i>Timothy Russell Hailes, Ald, JP.</i>	a Solicitor <i>Citizen and Common Councilman</i> <i>Citizen and International Banker</i>	East Finchley
<b>Annette Ellen Saunders</b> <i>Keith David Forbes Bottomley, Deputy</i> <i>Timothy Levene, CC</i>	a Corporate Responsibility Manager <i>Citizen and Wheelwright</i>  <i>Citizen and Carmen</i>	Catford
<b>Professor Patricia Anne Rodenburg</b> <i>Vivienne Littlechild, CC, JP</i> <i>David John Bradshaw, Deputy</i>	a Voice Coach  <i>Citizen and Glover</i> <i>Citizen and Common Councilman</i>	Camden
<b>Susan Jane Primmer</b> <i>Jeremy Lewis Simons, CC</i> <i>Catherine Sidony McGuinness, Deputy</i>	a Communications Director <i>Citizen and Scientific Instrument Maker</i> <i>Citizen and Solicitor</i>	Isle of Dogs
<b>Ms Catherine McBride</b> <i>Andrew Paul Mayer, CC</i> <i>Mark Raymond Peter Wheatley, CC</i>	an Economist <i>Citizen &amp; Common Councilman</i> <i>Citizen and Draper</i>	Kensington
<b>Katherine Laurette Andrews</b> <i>Andrew Paul Mayer, CC</i> <i>Mark Raymond Peter Wheatley, CC</i>	an Economist <i>Citizen &amp; Common Councilman</i> <i>Citizen and Draper</i>	Lambeth
<b>Mrs Beverly Hurley, CBE</b> <i>Marianne Bernadette Fredericks, CC</i> <i>Roger Arthur Holden Chadwick, OBE, Deputy</i>	a Chief Executive Officer <i>Citizen and Baker</i>  <i>Citizen and Bowyer</i>	Tower Hill
<b>Samantha Josephine Smethers</b> <i>Thomas Sleigh, Deputy</i> <i>Tijs Broeke, CC</i>	The Chief Executive of the Fawcett Society <i>Citizen and Common Councilman</i> <i>Citizen &amp; Common Councilman</i>	Wood Green
<b>Sabine Anna Chalmers</b> <i>Tijs Broeke, CC</i> <i>Thomas Sleigh, Deputy</i>	a General Counsel <i>Citizen &amp; Common Councilman</i> <i>Citizen and Common Councilman</i>	Soho
<b>Speranta Maria Knowles</b>  <i>Tijs Broeke, CC</i> <i>Thomas Sleigh, Deputy</i>	a Corporate Services and Events Manager <i>Citizen &amp; Common Councilman</i> <i>Citizen and Common Councilman</i>	Winchmore Hill
<b>Rachel Clare Levy</b> <i>Jeremy Lewis Simons, CC</i> <i>Catherine Sidony McGuinness, Deputy</i>	a Librarian <i>Citizen and Scientific Instrument Maker</i> <i>Citizen and Solicitor</i>	Lewes, Sussex



<b>Tulsi Naidu</b> <i>Anne Helen Fairweather, CC</i> <i>Roger Arthur Holden Chadwick,</i> <i>OBE, Deputy</i>	an Executive <i>Citizen &amp; common Councilman</i> <i>Citizen and Bowyer</i>	Kensington
<b>Evelyn Hamilton</b> <i>Thomas Sleigh, Deputy</i> <i>Tijs Broeke, CC</i>	a Consumer Finance Managing Director <i>Citizen and Common Councilman</i> <i>Citizen &amp; Common Councilman</i>	Highbury
<b>Danai Kyriakopoulou</b> <i>Thomas Sleigh, Deputy</i> <i>Tijs Broeke, CC</i>	an Economist <i>Citizen and Common Councilman</i> <i>Citizen &amp; Common Councilman</i>	Islington
<b>Jocelyn Joyce Hillman</b> <i>Tijs Broeke, CC</i> <i>Thomas Sleigh, Deputy</i>	a Charity Chief Executive <i>Citizen &amp; Common Councilman</i> <i>Citizen and Common Councilman</i>	Highbury
<b>Jacqueline Suzanne Campbell</b> <i>Elizabeth Rogula, Deputy</i> <i>John Douglas Chapman, CC</i>	an Assistant Housing Director, retired  <i>Citizen and Common Councilman</i> <i>Citizen and Common Councilman</i>	Stratford Upon Avon, Warwickshire
<b>Louise Felicity Jeffreys</b> <i>Giles Robert Evelyn Shilson,</i> <i>Deputy</i> <i>Thomas Sleigh, Deputy</i>	an Artistic Director <i>Citizen and Ironmonger</i>  <i>Citizen and Common Councilman</i>	Leytonstone

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## Report – City Remembrancer

### Measures introduced into Parliament which may have an effect on the services provided by the City Corporation

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

#### **Statutory Instruments**

#### **Date in Force**

#### **The Geo-Blocking (Enforcement) Regulations 2018 S.I. No. 1153      3 December 2018**

The Regulations allow for enforcement action to be taken under the Enterprise Act 2002 where a trader takes part in the unjustified blocking of access to a website on the basis of a customer's geographic location within the EU or where discriminatory terms of access are imposed on the basis of a customer's nationality, place of residence or place of establishment. The Regulations apply to the Common Council in its capacity as a weights and measures authority.

(The text of the measure and the explanatory notes may be obtained from the Remembrancer's Office.)

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Motion A–  
*by Graeme Harrower*

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

**Motion:-**

“That this Honourable Court resolves to instruct the Town Clerk to convene, by 20 December 2018, a working party which is:

(a) to consist of:

- i. up to five Members of this Court:
  - one of whom is to be the Chairman;
  - who do not sit on the Standards Committee;
  - who include Members representing residential and business wards;
  - a majority of whom are legally qualified; and
  - who may also be members of a working party considering the reform of proceedings for alleged breaches of the Code of Conduct;
- ii. one representative of the Barbican Association, one representative of Golden Lane Estate Residents Association, and one person representing collectively all the smaller City residents’ associations (including Petticoat Square and Mansell Street); and
- iii. two officers appointed by the Town Clerk;

(b) to consider an interpretation of “pecuniary interest” in paragraph 13 of the Code of Conduct that has regard to:

- i. the purpose of the corresponding provision (section 31) of the Localism Act 2011;
- ii. the expectations of residents that they will be represented by those whom they have elected; and
- iii. the expectations of the general public as regards Members’ business and non-business (such as livery company) interests;

in order to inform an appropriate dispensations policy;

(c) to obtain such advice as the working party may consider appropriate from one or more Queen’s Counsel who have expertise in administrative law and who have not previously been instructed on behalf of the Corporation, and to commission research on the dispensation policies of other local authorities; and

(d) to report its recommendations to this Court for consideration at its meeting in March 2019.”

*Signatories to the Motion, pursuant to Standing Order 12(3):-*

*Graeme Harrower  
Thomas Anderson  
Adrian Bastow  
Matthew Bell  
Mark Bostock  
John Chapman  
Marianne Fredericks*

*Christopher Hill  
Robert Merrett, Deputy  
Brian Mooney, Deputy  
Barbara Newman  
Dhruv Patel, O.B.E.  
Susan Pearson  
William Pimlott*

Motion B–  
*by Graeme Harrower*

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

**Motion:-**

“That this Honourable Court resolves to instruct the Town Clerk to convene, by 20 December 2018, a working party which is:

- a) to consist of:
  - i. up to five Members of this Court:
    - one of whom is to be the Chairman;
    - who do not sit on the Standards Committee;
    - a majority of whom are legally qualified; and
  - who may also be members of a working party convened at around the same time to consider the matter of “pecuniary interest”; and
  - ii. two officers appointed by the Town Clerk;
- b) to consider:
  - i. whether strict adherence should be had to the existing requirement of the (recently revised) complaints procedure that an allegation of a breach of the Code of Conduct must be made by an individual whose identity must (except in the very limited circumstances specified) be disclosed, so that the Corporation does not itself become a complainant on the basis of information received from anonymous informants;
  - ii. whether the functions of each of the Dispensation Sub-Committee, Assessment Sub-Committee and Hearing Sub-Committee should instead be performed by one or more individuals who have significant judicial experience (such as a retired judge) and who have no connection with the Corporation or City-related associations, and to consider the associated administrative arrangements, while retaining the recently constituted Standards Appeals Committee, which will allow ultimate member oversight; and
  - iii. whether an appeal should lie from a decision of the Dispensation Sub-Committee (or a person or persons performing its function) as well as the Hearing Sub-Committee (or a person or persons performing its function) to the Standards Appeals Committee;
- c) to obtain such advice as it may consider appropriate from one or more Queen’s Counsel who have expertise in administrative law and who have not previously been instructed on behalf of the Corporation; and

- d) to report its recommendations to this Court for consideration at its meeting in March 2019.

*Signatories to the Motion, pursuant to Standing Order 12(3):-*

*Graeme Harrower  
Thomas Anderson  
Adrian Bastow  
Matthew Bell  
Mark Bostock  
John Chapman  
Marianne Fredericks*

*Christopher Hill  
Robert Merrett, Deputy  
Barbara Newman  
Dhruv Patel, O.B.E.  
Susan Pearson  
William Pimlott  
Mark Wheatley*



# Report – Policy & Resources Committee

## Project Management Review

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

### SUMMARY

It is recognised that the current approach to project management within the City Corporation has served well but as pressures have grown the time has come for evolution. This is evident both from issues identified within large and complex programmes of work undertaken by the City of London Corporation, as well as through feedback following an independent review conducted in 2017.

A programme of work has therefore been undertaken to review the current governance procedures and address the issues identified with the City Corporation's approach to project management. The first phase of the recommended improvements stemming from this review is now ready for implementation, pending the approval of the Court. This includes:

- The number of stages in the Gateway Approval Process being changed to a maximum of six;
- The introduction of a Costed Risk Provision;
- The approval of a revised version of the Projects Procedure incorporating these changes.

### RECOMMENDATIONS

Members are asked to:

- (i) approve the new Projects Procedure set out at Appendix 5 to the report;
- (ii) delegate future amendments to the Projects Procedure to the Policy and Resources Committee as the City Corporation's approach to project management is further developed; and
- (iii) subject to approval of (ii), approve an amendment to Standing Order No.50 (3).

### MAIN REPORT

#### Background

1. The current project management process within the City Corporation was implemented in 2011. Whilst it has been the subject of moderate revisions over recent years, it is now timely to implement some more fundamental improvements to the process. This is evident from, as well as feedback from Arcadis,

2. Following an independent review conducted by Arcadis in 2017, as well as the identification of issues within large and complex programmes of work undertaken by the City Corporation, a programme of work has been ongoing to review the current governance procedures and address the issues identified with the City's approach to project management.
3. The first phase of review is now set for implementation. This stage has been reached following a review of the existing procedures and practices, which has led to the range of proposals outlined, as recommendations to enhance the approach to Project Management. A review of the financial thresholds will begin in the New Year.

### **Issues**

4. Consultation and analysis identified the following issues with the City Corporation's approach to Project Management:
  - Early development stages of projects: Lack of clear measurable objectives and outcomes; unclear project ownership; insufficient engagement between departments; imprecise definition of project; inadequate assessment of risks and potential cost of those risks.
  - Lack of cumulative reporting: No mechanism to aid Members to track cumulative changes between Gateway stages throughout the project lifecycle; absence of documentation to report incremental scope and budget changes; the current process reflects the last decision made at Committee but not the total changes made since the start of project.
  - Governance: Governance procedures are focused heavily on Committees and process rather than outcome maximisation; insufficient delegations to deal with risks which are realised outside of the Committee cycle; a lack of understanding amongst officers as to how the process works.
  - Inconsistency in reporting: Lack of standardisation for reporting of finance and risk; Provision of information in different formats; variance in approaches across departments.

### **Solutions**

5. A range of proposals have been developed as solutions to the issues outlined. These have been presented to your Projects Sub Committee at various stages throughout the year for feedback and are supported.

#### Changes to the early development stages of projects

6. The introduction of a Project Briefing document will help to capture key information at project inception (such as measurable objectives/outcomes) and serve as a record of initial project aims. The addition of a costed risk process will help identify the potential breadth of the project, and revised sign-off procedures, whereby projects require Chief Officer approval prior to entering the Gateway Process, will also assist.
7. Benefits of these changes include closer alignment with standard industry practice, a mechanism to encourage collaboration between departments and greater clarity on the objectives and outcomes the project is required to deliver.

#### Introduction of cumulative reporting

8. A Project Cover Sheet has been introduced for the implementation of cumulative reporting. It will bring the benefit of capturing changes between Gateway stages, to allow Members to monitor any incremental changes in budget or scope, against what was initially agreed. This is essential for robust governance and oversight as currently the budget is re-baselined after each Committee approval.

#### Revised Governance Process/Projects Procedure:

9. A revised governance process has been proposed for a more streamlined approach, reducing the total number of Gateway stages to a maximum of 6 (for complex projects), whilst linking each Gateway stage to a specific outcome (see Appendix 1 for further information). This now has closer alignment to the RIBA project delivery methodology (as outlined within the Projects Procedure) and will be simpler to communicate with external stakeholders.
10. The report format, tools and templates utilised have been revised as part of this process. This is still ongoing and will be monitored under Project Sub Committee supervision to ensure they remain fit for purpose or adjusted accordingly. These changes are proposed to support delivery at pace, whilst ensuring information is presented in a consistent and succinct manner, to support informed decision making and robust central governance.

#### **Costed Risk Provision**

11. The review process has highlighted that project risk remains an area in need of refinement. Specifically, a range of issues were identified including inconsistency in reporting, lack of standardisation, limited provisions to deal with risks which are realised without formal Committee approval, and a bureaucratic and inefficient process leading to numerous budget increase requests to Members (sometimes for nominal sums of money), together with additional time and cost delays as officers wait for Committee to meet or process urgency requests.
12. The Projects Sub Committee considered range of options to address these issues and the implementation of a Costed Risk Provision is the preferred option. This would be implemented on a strictly controlled basis and linked to costed risks. Such an approach would consist of Members agreeing to a list of identified risks presented on a standardised costed risk register. Each Gateway report will request a specific officer's Costed Risk Provision to reach the next Gateway, based on these risks presented to Members. Should those specific risks seen and approved by Members materialise, officers will be able to utilise the approved provision to deal with these issues, via delegated approval to Chief Officers. Fuller details in relation to the approvals process are set out in Appendix 3.
13. This approach brings the following benefits:
  - Mechanism for swift response to deal with urgent issues;
  - Restricts usage to essential pre-approved items required for risk management (agreed by Projects Sub Committee);
  - Prevents any out of scope expenditure;

- Ensures that officers comprehensively assess the risks associated with a project from an early stage;
- Reduction in bureaucracy and paperwork submitted to Committee for low-value items;
- Fewer delays in project delivery and potential rising costs from such delays;
- Promotion of culture change and steps towards empowering qualified Project Managers to take responsibility for managing their budgets actively;
- Maintains Member oversight of usage;
- Allows for informed decision making. Where risk and the proposed amount is deemed excessive, Members may defer approval until there is confidence these can be reduced;
- Alignment with standard industry practice;
- Unspent amounts will be removed from the project budget by the Chamberlain and reported;
- Establishment of a process that has worked well on other projects, such as the Hampstead Heath Ponds Project.

### **Proposal**

14. Approval is currently required from the Court of Common Council to make changes to the Projects Procedure and the revised Procedure is set out at Appendix 5 for consideration.
15. It is also recommended that, in future, authority to make changes to the Projects Procedure should be delegated to the Policy and Resources Committee, to allow it to make changes that enhance the effectiveness of the Projects Procedure more expeditiously. This is requested to support the Committee in implementing any necessary changes for strategic oversight of the management of projects. Standing Order No.50(3) would need to be amended as a consequence.
16. Delegation is also sought for that Committee, through its Projects Sub Committee, to authorise minor operational changes related to Project Management (for matters such as adjusting tools and templates as enablers), to make adjustments where necessary, to continue to fulfil its role of scrutiny and Project Assurance. The changes proposed have been piloted under Projects Sub Committee supervision and have worked well to date.

### **Project Management Capability**

17. As part of the review, the offer of support and training to Project Managers is also being developed. This is necessary to ensure there is appropriate guidance to equip Project Managers with the skills they need to successfully deliver projects.
18. There is an existing classroom-based training offer which has been re-designed to ensure it has relevance to the way in which the City Corporation manages projects. An online training module and project toolkit will also be developed to provide further guidance on how projects are run within the City Corporation.

19. HR are currently progressing with early planning stages for the establishment of City Academy, a Corporate learning and development programme which will bring together various training streams under an overarching framework. These streams will relate to the development of skills such as Leadership, Apprenticeships and Project Management. The work to date on the Project Management Review will be embedded into the City Academy and this will include training modules around internal governance, risk and budget management.
20. A peer review process will also be established for major projects. This concept would establish a network of Project Managers who can act as a 'critical friend' to review other projects in a project assurance capacity, providing constructive feedback and suggestions based on experience from other projects.

### **Next Steps**

21. The overall Projects Procedure and financial thresholds have not been reviewed since implementation at the start of the decade. Following these proposed changes to develop a more mature approach to Project Management, it would be prudent to review the current financial thresholds for the Gateway Approval Process, to support Member scrutiny and oversight in focusing on high-risk projects. This would also offer an opportunity for greater alignment with changes in Procurement frameworks.
22. A subsequent report is submitted to Policy and Resources Committee after the New Year, outlining options for changes to the thresholds, for Member consideration.

### **Appendices**

- Appendix 1 – Gateway Process Outcomes;
- Appendix 2 – Summary of Changes;
- Appendix 3 – Costed Risk Approval Process;
- Appendix 4 – Summary of Proposed Amendments to the Projects Procedure;
- Appendix 5 – Revised Projects Procedure

All of which we submit to the judgement of this Honourable Court.

DATED this 15<sup>th</sup> day of November 2018.

SIGNED on behalf of the Committee.

**Catherine McGuinness, Deputy**  
Chairman, Policy and Resources Committee

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## Appendix 1 – Gateway Process Outcomes

Gateway	Title	Outcome	Benefit
1	Project Briefing	<ul style="list-style-type: none"> <li>• Inclusion in business plan;</li> <li>• Chief Officer approval to develop a project proposal.</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen early development stages;</li> <li>• Align with departmental priorities;</li> <li>• Chief Officer oversight of projects entering the system.</li> </ul>
2	Project Proposal	<ul style="list-style-type: none"> <li>• Authority to establish a project;</li> <li>• Budget/funding allocated (where appropriate).</li> </ul>	<ul style="list-style-type: none"> <li>• Member and Corporate oversight at inception;</li> <li>• Strengthen early development stages.</li> </ul>
3/4	Options Appraisal	<ul style="list-style-type: none"> <li>• Agreed option to explore further/project delivery;</li> <li>• Budget/funding allocated (where appropriate).</li> </ul>	<ul style="list-style-type: none"> <li>• Member oversight of options and opportunity to assess benefits of each delivery model;</li> </ul>
5	Authority to Start Work	<ul style="list-style-type: none"> <li>• Approval to commence works granted;</li> <li>• Budget/funding and project sum for delivery agreed.</li> </ul>	<ul style="list-style-type: none"> <li>• Project delivery can begin;</li> <li>• Streamlined governance with delegation to approve granted to Chief Officers (for projects not deemed to be high risk).</li> </ul>
6	Outcome Report	<ul style="list-style-type: none"> <li>• Project closure;</li> <li>• Verification of final accounts (where appropriate).</li> </ul>	<ul style="list-style-type: none"> <li>• Project closure;</li> <li>• Opportunity for evaluation and analysis of lessons learned;</li> <li>• Information captured for benchmarking and sharing best practice.</li> </ul>

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## Appendix 2 – Summary of Changes

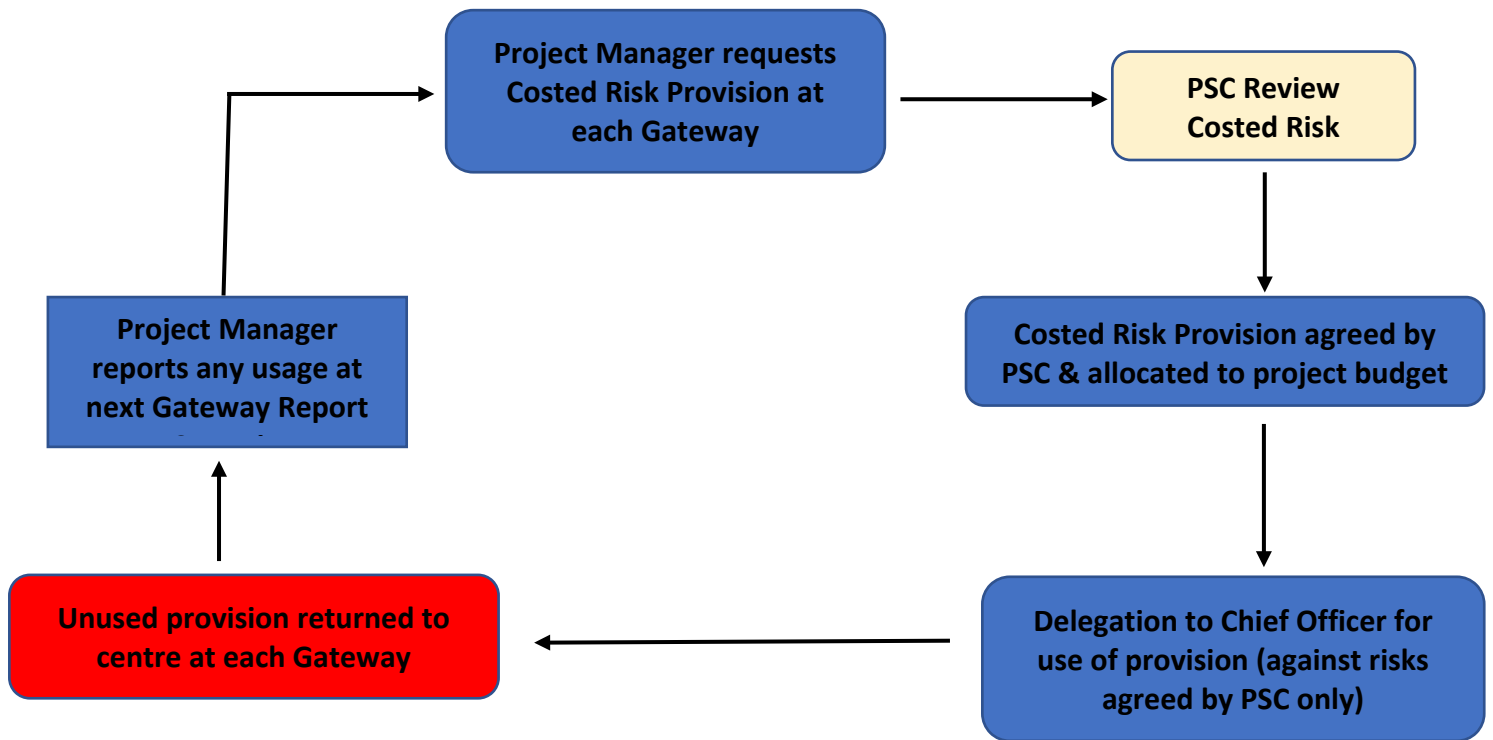
Change	Benefits	Agreed by PSC (Y/N)	Next Steps
Introduction of Project Briefing	<ul style="list-style-type: none"> <li>• Capture key information up front;</li> <li>• Strengthen early development stages of projects.</li> </ul>	Y	<ul style="list-style-type: none"> <li>• Implementation after the New Year (currently in pilot).</li> </ul>
Revised sign off-process	<ul style="list-style-type: none"> <li>• Chief officer approval on projects prior to entering Gateway process.</li> </ul>	Y	<ul style="list-style-type: none"> <li>• Implementation after the New Year (currently in pilot).</li> </ul>
Introduction of Project Cover Sheet	<ul style="list-style-type: none"> <li>• Provides a cumulative narrative for projects throughout the process (including scope and budget changes).</li> </ul>	Y	<ul style="list-style-type: none"> <li>• Implementation after the New Year (currently in pilot).</li> </ul>
Amendments to the Gateway Approval Process	<ul style="list-style-type: none"> <li>• Streamlining governance and linking each stage to a clear outcome.</li> </ul>	Y	<ul style="list-style-type: none"> <li>• Court Approval required.</li> </ul>
Revised Templates	<ul style="list-style-type: none"> <li>• Provision of information in a clearer manner for informed decision making (e.g. recommendations moved to the top).</li> </ul>	Y	<ul style="list-style-type: none"> <li>• Changes to G1-2 and outcome reports (previous G7) in pilot, others to follow, PSC to review and tweak (templates are deemed enablers).</li> </ul>
Introducing a Costed Risk Provision	<ul style="list-style-type: none"> <li>• Increased delegations to deal with risks which are realised and facilitate delivery at pace.</li> </ul>	Y	<ul style="list-style-type: none"> <li>• Court Approval required.</li> </ul>

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### **Appendix 3 – Costed Risk Approval Process**

The proposal is as follows:

- The Project Manager will produce a costed risk register to be updated and submitted at each Gateway stage (including Progress and Issue Reports), outlining their requested provision amount based on their evidence-based risk analysis;
- Members will review and scrutinise both the costed risk register and proposed provision before approving an appropriate amount against a specific risk locked down for that Gateway;
- The risk provision will be held on a separate budget line and use will not be permitted for items not listed in the costed risk register agreed by Members;
- Should a risk on the risk register become an issue requiring contingent action the default position will be the provision allocated can be accessed for mitigation, following Chief Officer sign off;
- However, should the Chief Officer feel the Project Manager is appropriately skilled and trained they may delegate this responsibility to the Project Manager, though this must be set out clearly at the start of the project when submitting the Gateway 2 paper (Project Briefings at Gateway 1 require Chief Officer approval as part of the new process);
- The Chairman of Projects Sub Committee may call in projects to provide further details on the nature of usage;
- The cumulative total provision and spend will be tracked via the Project Cover Sheet, whilst a template will be developed to initiate the request for release of the funds;
- Project Managers will be expected to return at each Gateway with an updated risk analysis logging changes, including the impact of mitigation action taken and any provision used, as well as the new proposed provision amount requested for that stage;
- There will be a clear distinction between the requested amount for each Gateway risk provision and the overall estimated risk value against the project. Budget will be approved for the former after review at each stage, whilst the latter is expected to change according to use of the Gateway risk provision. A total project risk provision will not be allocated up front;
- Where the Gateway provision spent exceeds £500,000, this will automatically trigger a report to Committee, updating Members on how the funds have been used;
- It is expected that clarity on the risks and costs attached to a project improve throughout each stage, with the benefit of earlier mitigation reducing the overall estimated costed provision required at commencement of work.



## Appendix 4 - Summary of Proposed Amendments to the Projects Procedure

Current Project Procedure	Revised Projects Procedure	Benefits of Change
<ul style="list-style-type: none"> <li>• 7 stages within Gateway Approval Process.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced to 6 stages.</li> </ul>	<ul style="list-style-type: none"> <li>• Streamlined to link each stage to a specific outcome (rather than focus on process);</li> <li>• Closer alignment with RIBA methodology.</li> </ul>
<ul style="list-style-type: none"> <li>• No formal Costed Risk Process;</li> <li>• No mechanism to deal with issues realised outside of Committee.</li> </ul>	<ul style="list-style-type: none"> <li>• Established costed risk process, subject to Project Sub Committee agreeing a provision, following scrutiny of a costed risk register.</li> </ul>	<ul style="list-style-type: none"> <li>• Mechanism to deal with pre-identified issues which are realised swiftly;</li> <li>• See main report for further information (Costed Risk Provision Benefits section in the main report, point 28).</li> </ul>
<ul style="list-style-type: none"> <li>• Outcome reports expected after accounts have been verified.</li> </ul>	<ul style="list-style-type: none"> <li>• Outcome reports expected within 6 months of completion (regardless of whether accounts have received verification).</li> </ul>	<ul style="list-style-type: none"> <li>• Verification of accounts can occasionally take a significant amount of time, therefore in some cases outcome reports are not received until well after completion;</li> <li>• Ensures project evaluation and analysis of lessons learned soon after completion as per standard industry practice.</li> </ul>
<ul style="list-style-type: none"> <li>• Project lifecycle begins with Authority to Submit Project Proposal.</li> </ul>	<ul style="list-style-type: none"> <li>• Addition of Project Briefing (new Gateway 1) prior to Project Proposal stage;</li> <li>• Requires Chief Officer sign off.</li> </ul>	<ul style="list-style-type: none"> <li>• Chief Officer approval of projects entering the Gateway Process;</li> <li>• New document to ensure brief captures key information up front and aligns with standard industry practice.</li> </ul>
<ul style="list-style-type: none"> <li>• No cumulative reporting between Gateway stages.</li> </ul>	<ul style="list-style-type: none"> <li>• Addition of Project Cover sheet as fixed appendix once a project budget is established.</li> </ul>	<ul style="list-style-type: none"> <li>• Mechanism to capture changes in budget and scope throughout the project lifecycle.</li> </ul>

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# City of London Project Procedure

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## Oct 2018

### Overview

1. Projects are one of the key ways that the City of London Corporation delivers its strategic aims and priorities. The City Corporation is committed to ensuring that projects are delivered efficiently and that the best use is made of the resources available to the organisation.
2. The Project Procedure is approved by the Policy and Resources Committee. Any changes to the Project Procedure require the authorisation of the Policy and Resources Committee.
3. The Project Procedure has been designed to encourage consistency of delivery across the organisation, while allowing flexibility to respond to circumstances with appropriate speed. It is designed to ensure that our work reflects our strategies, and that we have policies in place to discharge our statutory and non-statutory duties with proper oversight and control.
4. All projects over £50,000 that have tangible, physical deliverables (including IS projects) must be recorded on the Corporation's Project Portfolio Management tool.
5. The Project Procedure applies to the following categories of projects that have tangible, physical deliverables (including IS projects):
  - a. Capital and supplementary revenue projects over £50,000
  - b. Routine revenue projects over £250,000
  - c. Capital and supplementary revenue projects delivered with ringfenced funds over £250,000 (e.g. Section 278, Designated Sales Pools, Additional Works Programmes, Housing Revenue Account)
6. Some large Capital projects will be overseen by the Capital Buildings Committee, indicatively where the project is £100m+ or where it has been referred there by the Court of Common Council. For these projects, Capital Buildings Committee will be responsible for;
  - (i) overall direction
  - (ii) review of progress; and
  - (iii) decisions on significant option development and key policy choices.

If oversight is transferred to the Capital Buildings Committee those projects will not be required to be seen at Projects Sub-Committee. Refer to the Capital Building Committee Clerk for guidance on governance and reporting requirements.
7. The Projects Procedure does not apply for Capital and supplementary revenue projects under £50,000 or revenue projects under £250,000 or ringfenced projects under £250,000. Where a mixture of funding is used the lowest threshold will apply. It is recommended the Gateway process documentation is used for projects outside of the Projects Procedure. Projects of any value can be 'called in' to Projects Sub-Committee and any that develop to be within the thresholds will then enter the gateway approval process.

7.1 Delegations exist within the projects procedure. Where delegations are made (to Chief Officer) it is expected that the gateway approval process documentation will be completed, even if it is not required to be presented to Member committees. This is to ensure that good governance and record keeping is maintained. Chamberlains Audit and Risk teams will conduct period audits of projects under the thresholds or under delegated approval limits to ensure that appropriately rigorous governance and documentation is maintained.

8. This document contains information about:

- Governance
- Resource Allocation Timetable
- Approval Process
- Ringfenced Funds
- Routine Revenue Projects
- Changes to Projects: Before Agreement at Authority to Start Work
- The Project Sum
- Risk and Costed Risk Provision
- Changes to Projects: After Agreement at Authority to Start Work
- Procurement and Contract Letting
- Project Toolkit

9. If you have any queries or comments about the Project Procedure or about project management generally at the City Corporation, please contact the Town Clerk's Programme Office

[Corporate.ProgrammeOffice@cityoflondon.gov.uk](mailto:Corporate.ProgrammeOffice@cityoflondon.gov.uk)



## **Governance**

10. All building related projects that are likely to require over £50,000 of capital expenditure over the following five years must be identified in the Asset Management Plan (AMPs) for the site. AMPs are a key part of the departmental business planning process and a corporate requirement under Standing Order 53. For further information on AMPs, please contact the Head of Corporate Asset Management in the City Surveyor's Department.
11. Approval of the City of London Corporation's programme of projects is the responsibility of the Policy and Resources Committee through its Projects Sub-Committee, which scrutinises individual projects, and the Resource Allocation Sub-Committee, which considers the overall programme of project activity and its funding. Decisions about projects are made in conjunction with Service Committees and, for high value projects, the Court of Common Council.

### **Projects Sub-committee Terms of Reference**

To be responsible for:

- Authorising individual projects on behalf of the Policy and Resources Committee at each stage of the City Corporation's agreed Project Approval Process;
- Recommending requests to the Resource Allocation Sub-Committee/the Policy and Resources Committee for projects to be included in the capital/supplementary revenue programme;
- Overseeing the City Corporation's programme of projects, excluding those within the remit of the Corporate Asset Sub-Committee, to ensure their delivery within the parameters set by the Resource Allocation Sub-Committee; Note however that Projects Sub-Committee can call-in projects outside of gateway for review e.g. Cyclical Works Projects.
- Monitoring the procurement arrangements for capital and supplementary revenue projects and advising the Finance Committee of any issues; and
- Periodically reviewing the City Corporation's project management processes and procedures.

Projects Sub-committee does not:

- Control the release of funding, the committee is not in control of funding pots (with the exception of the Contingency fund [47]); its remit is to judge value for money and the appropriateness of the budget, it can approve costed risk budgets
- Agree Policy, this is the role of the Service committees, Policy and Resources and Resource Allocation-sub, its remit is to ensure good governance on the options chosen and that these are delivered well.

The Projects Sub-Committee periodically receives programme reports on all capital and supplementary revenue projects and can 'call in' any project at any stage of the Gateway Approval Process when it is considered appropriate to do so. As noted in [7] this can include projects which are being delivered under delegation.

12. For each gateway paper, the Committees (i.e. Service and Projects Sub) may receive the paper in any order, relative to the dates when those committees sit. A paper would not be considered as approved until all the relevant committees have

seen and approved it. The exception being the Officer Corporate Projects Board, which must see the Project Proposal (with attached Project Briefing), Issue reports and Outcome reports before they are presented to Member committees.

13. The Town Clerk's Corporate Programme Office clerks the Corporate Projects Board, which is a senior Officer panel which reviews Project Proposals, Issue reports and Outcome reports before they are submitted to Committees. The role of the group is to ensure consistent quality reporting and critical Officer challenge to projects.

**Corporate Projects Board**

Corporate Projects Board is a group of senior Officers, with cross departmental representation, which meets each month for a critical analysis of projects set to enter the Gateway Process. They provide an initial overview of projects at an early stage and report content, whilst offering guidance and support on progressing a project through Committees.

The Board will consider papers before they are seen by Members and can ask for papers to be redrafted or for them to be sent to Summit Group for corporate consideration before proceeding further.

14. Where the Town Clerk considers a scheme has policy implications, or where the Policy and Resources Committee has indicated it wishes to consider a particular project further, the report will also be submitted to that Committee.
15. The Finance Committee is responsible for obtaining value for money, improving efficiency and overseeing procurement generally across the City Corporation. The Finance Committee therefore receives periodic reports on the City Corporation's capital expenditure.
16. The Town Clerk's Corporate Programme Office monitors the progress of projects from start to finish. Departmental project teams are required to maintain up to date information about each project on Project Vision including monthly narrative updates, key dates, risks and issues. Additionally, key documentation such as Gateway papers should be uploaded.
17. Officer-level Project Boards may be established for individual projects. The establishment of a Project Board is particularly important for projects which require Officers from a number of different departments to deliver them. Guidance is available from the Town Clerk's Corporate Programme Office about the establishment, composition and running of Project Boards.
18. Project Steering groups can be created for a project. There are no formal terms of reference for their governance, however they could be used to engage with external stakeholders and provide recommendations to the Project Board.
19. For full details of the different roles and responsibilities relating to project management please refer to the Project Governance guidance available in the Project Toolkit.

**Resource Allocation Timetable**

20. The Resource Allocation Sub-Committee will determine the budget to be set aside for capital and supplementary revenue projects for the forthcoming financial

year. That sum will be included in the City's annual budget agreed by the Finance Committee and Court of Common Council in February/March each year.

21. New projects may enter the Gateway Approval Process at any time during the year but should be already planned in a department's business plan. The stages at which a project will be included in the capital programme are described in further detail below.

## **Gateway Approval Process**

22. All projects covered by this Project Procedure enter the Gateway Approval Process at Gateway 1 and the general expectation is that projects will normally proceed through Gateways 1 to 6 in sequence.
  - I. Note that in Summer 2018 the naming and numbering of the Gateways was changed, the content was revised significantly in the case of Gateways 0-2 and 6-7, and that 'Project Briefings' & 'Project Coversheets' were introduced.
23. To allow projects to proceed at the appropriate speed and to ensure that the City Corporation is able to take advantage of circumstances as they arise, Standing Orders authorise the Town Clerk, in consultation with the Projects Sub- Committee, or the Chairman and Deputy Chairman thereof as appropriate, to vary the Gateway Approval Process in relation to individual projects in cases when it is deemed appropriate to do so (e.g. to take advantage of external funding sources).
24. There should be no assumption that the Gateway Approval Process is a linear process and it is possible that more complex schemes may include the preparation of more than one report at each stage, particularly in the options appraisal stages. Project Managers may need to combine Gateway reports, which can be done by exception. Where this is the case seek advice and confirm your planned approach with the Corporate Programme Office before submitting combined reports to Committee.
25. The City has adopted a Gateway Approval Process with three tracks: complex, regular and light. The decision about which track a project should follow depends on the estimated cost and the level of risk, complexity and uniqueness. The matrix below provides guidance on the track that should be followed. There is flexibility to move projects between tracks at any stage if it becomes evident that a project is more or less complex than originally anticipated (though this should be done as a recommendation within a Gateway or issue report).

		<b>Risk, Complexity &amp; Uniqueness</b>		
		<b>Low</b>	<b>Medium</b>	<b>High</b>
<b>C O S T</b>	<b>Under £250k</b>	<i>Light</i>	<i>Light</i>	<i>Regular</i>
	<b>£250k to £5m</b>	<i>Regular</i>	<i>Regular</i>	<i>Complex</i>
	<b>Over £5m</b>	<i>Regular</i>	<i>Complex</i>	<i>Complex</i>

Unless otherwise stated, 'cost' is the total estimated cost of the project and includes, but is not limited to, items such as works, fees and staff costs etc.

25.1 The total estimated cost of the project at the offset does not include future anticipated costed risk provision requests; however, Members can use the value of this and the total liability exposure from the risk register as part of their decision when confirming the track route. This reflects that a costed risk provision and costed risk register is a quantified financial measure of the risk of a project.

25.2 Projects can change in their complexity and cost over their lifetime. The trackways are therefore not fixed, and projects can move across (i.e. from Regular to Complex, or Regular to Light), if the situation changes. However,

such a change must be approved by Members (as the Gateway track was also approved by them initially), and that change must be approved before any decisions which would be delegated on approval are made.

26. The stages in the Gateway Approval Process are:

#### **Gateway 1. Project Briefing**

A short document which describes the core elements of the project concept. This is signed off by the Chief Officer and should be related to an idea within the departmental business plan, (it is recognized that some projects might not be in the business plan as they may be responding to emergent events, however these should be reflected in the next business plan review). Once approved a Project Briefing can then be developed into a full project proposal and will be attached to the Project Proposal seen by Members (Gateway 2).

#### **Gateway 2. Project Proposal**

Initially viewed by Corporate Projects Board, a short business case seeking Members' authority to proceed with the project through to the next relevant Gateway stage and to expend any internal or external resource. The proposal should establish clear, measurable objectives and targeted benefits for the City Corporation. At this stage, the relevant approval track (Complex, Regular or Light) will be determined. An indication of the intended procurement strategy should be set out at this stage in conjunction with City Procurement.

The Project Briefing should be an appendix to this report.

A costed risk register using the corporate template should accompany this report if a 'costed risk provision' (see [49]), is requested.

After the Project Proposal is approved all subsequent Gateway reports require a Project Cover Sheet.

#### **Gateway 3. Outline Options Appraisal**

The report should set out a range of viable options for proceeding with the project and make recommendations to Members on the option(s) to progress. Unless there is a statutory/safeguarding requirement a 'do nothing' option will be expected as a default.

Where there is only 'one' option, it is expected that there will be more than one variable in the quality/longevity of the implementation options (e.g. where something must be replaced, the options could be a 'like-for-like' replacement or 'an opportunity for a material upgrade and remodel').

The Project Coversheet should be an appendix to this report.

A costed risk register using the corporate template should accompany this report if a 'costed risk provision' (see [49]), is requested.

A PT4 Procurement Form should be an appendix to this report. Where contracts for Supplies & Services are >=£100k and or Works >=£400k, or below where Committees/Category Boards request it.

#### **Gateway 4. Detailed Options Appraisal**

Report setting out detailed appraisal of options, or variations of an option, taking account of further information available and advice by Members on previous report. The level at which the scheme design will be approved is to be determined at this stage (options would include Service Committee, Projects Sub-Committee, Chief Officer, Project Board, CPO). Approval of the procurement methodology will be sought at this stage (subject to approval of Gateway 4a if City funding is being sought, Gateway 4b if the project is estimated to cost over £5m and Gateway 4c the detailed design at the appropriate level) if required.

The Project Coversheet should be an appendix to this report.

A costed risk register using the corporate template should accompany this report if a 'costed risk provision' (see [49]), is requested.

**Gateway 4a. Inclusion in Capital Programme (if unallocated City funding is required for the project)**

Corporate Priorities Board will help Members prioritise the City resources that are allocated to projects by making recommendations to Resource Allocation Sub Committee.

The Project Coversheet should be an appendix to this report.

A costed risk register using the corporate template should accompany this report if a 'costed risk provision' (see [49]), is requested.

The Resource Allocation Sub-Committee will recommend to the Policy and Resources Committee whether to add a project to the capital programme, hold it in reserve, commission further work or stop it. If a project is added to the programme the Chamberlain's Finance team will prepare a report to the Resource Allocation Sub-Committee who will advise the Policy and Resources Committee as to how the expenditure should be phased.

**Gateway 4b. Court of Common Council Approval (projects over £5m)**

Approval of the Court of Common Council will be sought at this stage.

Court reports will be prepared by the Town Clerk's Office and use a non-Gateway template format. Consult with the Court Clerk on the content.

**Gateway 4c. Detailed Design**

Approval of the detailed design for the option selected at Detailed Options Appraisal, at the level agreed at that stage.

The Project Coversheet should be an appendix to this report.

A costed risk register using the corporate template should accompany this report if a 'costed risk provision' (see [49]), is requested.

**Gateway 5. Authority to Start Work**

Authority to begin delivering the project. The results of any tender exercise must be included in this report. The level of progress reporting is determined at this stage and can range from specific project reports to coverage by exception in routine updates, regular delegated officer reporting would be expected.

The Project Coversheet should be an appendix to this report.

A PT8 Procurement Form should be an appendix to this report. Where contracts for Supplies & Services are >=£100k and or Works >=£400k, or below where Committees/Category Boards request it.

A costed risk register using the corporate template should accompany this report if a 'costed risk provision' (see [49]), is requested.

**Gateway 6. Outcome Report**

Critical assessment of the project and the achievement of its objectives. This will include an update of spend, milestones and key deliverables. Lessons learnt and best practice identified during the delivery of the project will also be asked for, along with how that knowledge will be shared.

The Project Coversheet should be an appendix to this report.

All Outcome reports are to be submitted within 6 months of the end of the project (nominally described as handover to BAU). Where the project has outstanding legal issues, the accounts have not been signed off, or business benefits require evaluation over a longer period, this still applies, with a supplementary report delivered later, on the resolution of the outstanding issues.
--

### **Project Cover Sheet**

A short summary of the project, to provide cumulative reporting and a record of key changes and developments over its lifetime, required to accompany all Gateway reports (including Issues and Progress Reports) after Gateway 2 (Project Proposal) has been agreed. This allows Members and Officers to review the total progress of a project through its lifecycle.

### **Issues Reports**

A flexible format report to inform Members of an issue that requires a decision. Usually in response to the need to change the budget, milestones, deliverables/scope etc. To be accompanied by a Project Coversheet. Issues reports can be issued at any stage in the Gateway process. This report is usually written 'between Gateways'.

The Project Coversheet should be an appendix to this report.

### **Progress Reports**

Short updates, usually by exception, on progress made on project with particular focus on risk, cost and time. Frequency to be determined at 'authority to start work' stage, or earlier if delegated to Chief Officer before that stage. This is likely to be required for projects delivered over an extended period of time.

The Project Coversheet should be an appendix to this report.

## **27. Urgency and Delegation**

Projects Sub-Committee normally sits on a monthly basis (with an exception of the summer recess), however other committees may meet less frequently and Officers planning to submit papers to Committees should understand the committee timetables and plan around them accordingly.

27.1 Where a decision is required rapidly and must be done outside of the regular Committee timetable, this can be done via the 'Urgency' system (see Standing orders of the Court of Common Council: 41. Decisions between Meetings). In these instances, the power to make a decision will be delegated to the Town Clerk to make a decision, and before exercising this power, comments from the Chairman and Deputy Chairman of the Committee will be sought.

27.2 Urgent requests are submitted to the relevant Committee's clerk, who will make representations to the Town Clerk and Chairman and Deputy Chairman of the Committee. Once a decision has been taken it is reported to the next meeting of a Committee and is reflected in the minutes of that meeting. The urgency procedures should only be used for matters that are genuinely urgent and unforeseen. Consult the Committee Clerk if you are unsure.

27.3 Committees may decide they do not have enough information on the sitting date to make an informed decision and they may request additional information to be provided. Under such circumstances they may decide to delegate that decision outside of committee on receipt of the requested information. The approval process is the same as for urgent approvals.

28. Advice on the equivalent RIBA stages is available from the City Surveyor's Property Projects Division, See Appendix 1 for a summary.

29. Guidance on the reporting format and requirements for each stage is available in the Project Toolkit on the Corporate Programme Office intranet pages.

29.1 Risk Management must be an integral part of managing a project from start to finish. A separate guidance note in the Project Toolkit is available to assist Officers in how risk should be managed throughout the life of a project.

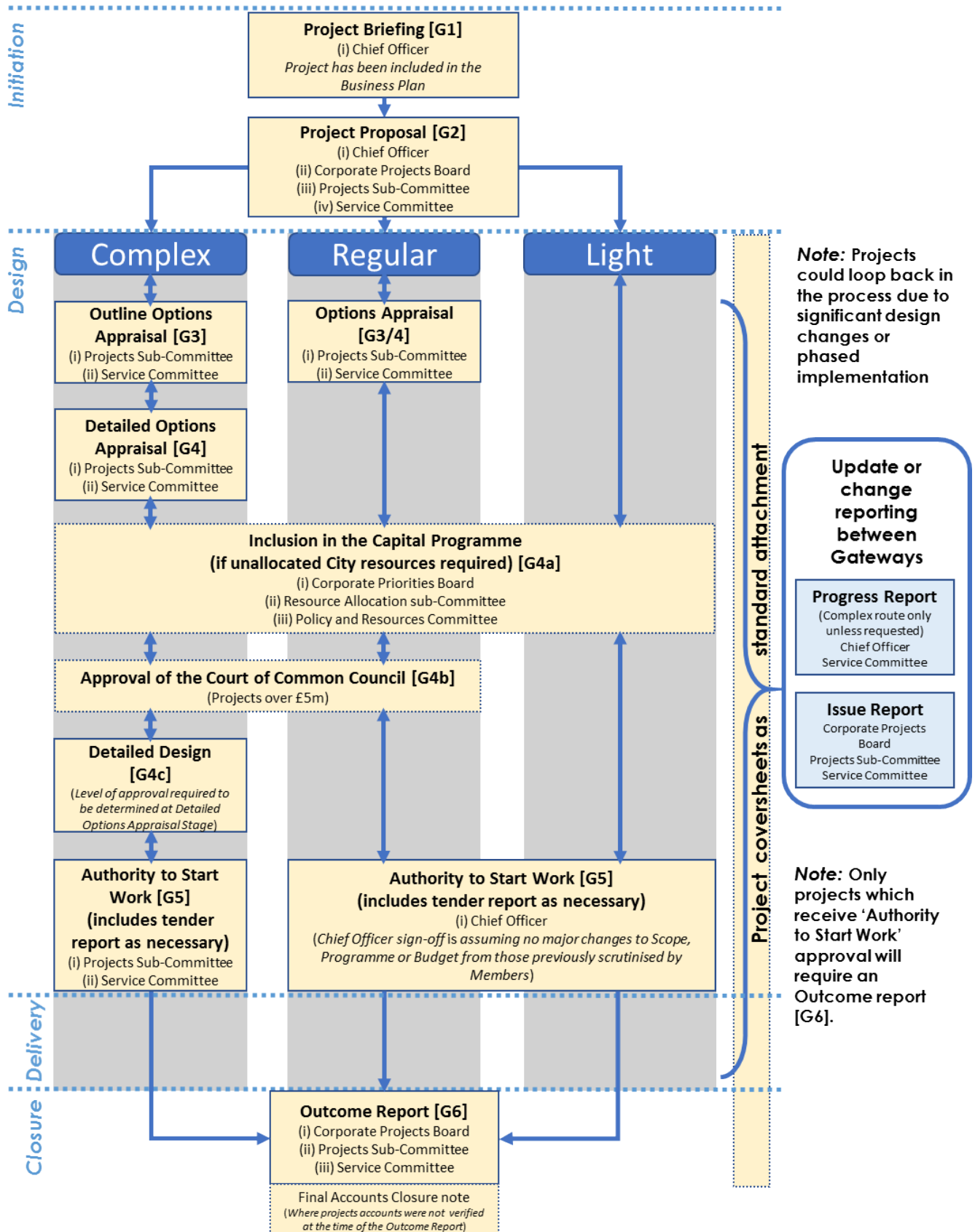
29.2 Note that all reports are submitted in the name of a Chief Officer (or equivalent), and that Chief Officers are accountable for the content to Members.

30. The diagram below sets out the Gateway Approval Process and the Committees with authority to consider and approve projects at each of the Gateways. It sets out the three tracks which will generally be followed.



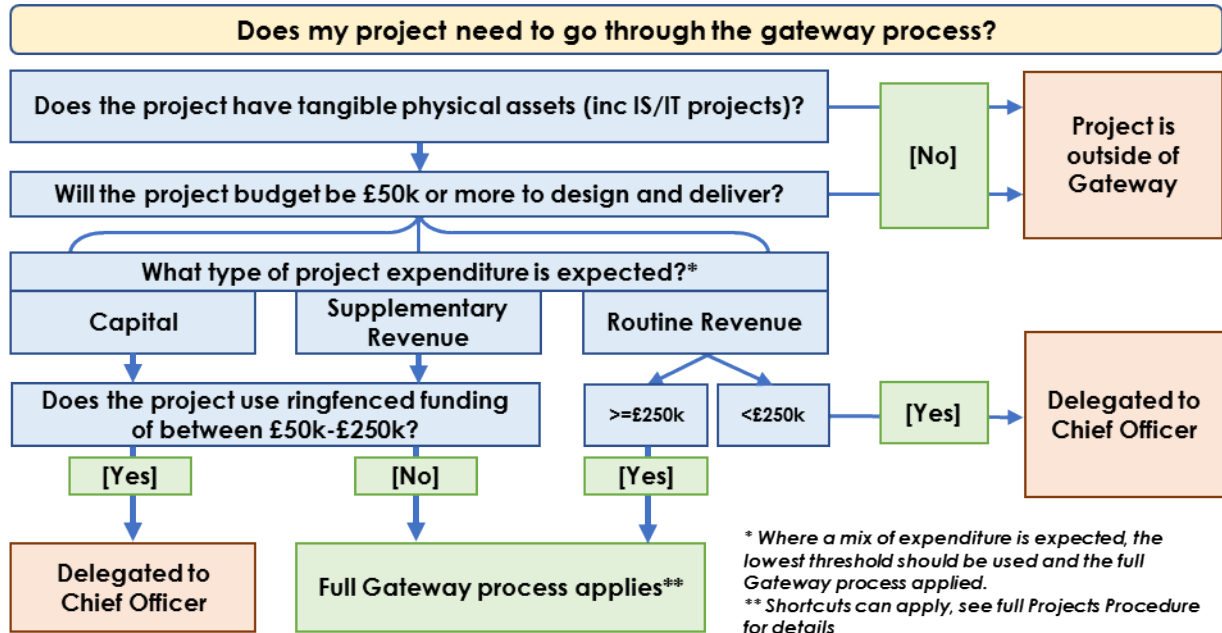
# Gateway Approval Process

The procedure applies to projects that result in tangible, physical deliverables (including IS projects).



# Entering the Gateway Process

The Projects Procedure and Gateway Process applies to projects that result in tangible, physical deliverables or assets, including Information Systems / Technology projects where the assets are 'digital' in nature.



The distinction between Capital, Supplementary Revenue and Routine Revenue is an accounting one and should be made by Chamberlains.

**Capital:** Major schemes (>£50,000) relating to the acquisition, creation or enhancement of an asset which yields benefits to the authority and the services it provides for a period of more than one year. Basic definition taken from the CIPFA Code of Practice on Local Authority Accounting, which has the force of law. Further conditions e.g. in relation to enhancements. Excludes regular or cyclical repairs, but includes cyclical replacement of major components, e.g. new windows etc.

**Supplementary Revenue:** (>£50,000) Project expenditure of a substantial or major nature which was previously classified as capital but is now revenue so as to conform to current accounting regulations, such as a major repair

**Routine Revenue:** Traditional revenue project expenditure which is met from local risk budgets. e.g. cyclical painting and repairs.

**Ringfenced funds:** Designated Sales Pools, Cyclical Works Programme, Housing Revenue Account, Section 278, Section 106, and Area Strategies. Ringfenced funds also includes activities where the external funder (i.e. TFL) is providing funding for a restricted purpose.

## Gateway Routes

		Risk, Complexity and Uniqueness		
Estimated Cost		Low	Medium	High
	(£50k<£250k)	Light	Light	Regular
	(£250k~£5m)	Regular	Regular	Complex
	(£5m+)	Regular	Complex	Complex

31. A project's total estimated cost is considered to be the total of all the anticipated expenditure on it from all sources (excluding costed risk provision, this will however be included in spend reporting and budget totals if drawn down). Internal officer costs (staffing) to develop a project are expected to be noted, even if new funding is not required, so that the City can better assess the true total cost of project development and delivery.
32. The Gateway process is not a strict linear progression. Projects may repeat a Gateway, deliver multiple similar Gateway reports (in the case of programmes or phased projects) or go back to an earlier point to rescope or redesign the project formally. Where this is the case it should be explicitly noted in the report. Any changes after Authority to Start Work has been approved should be submitted as Issues reports [See 45]. In some instances, it may be necessary to advance some element(s) of the works to fit with timelines out of our control (e.g. TFL, UKPN) before a full Gateway paper is ready. Where this is the case multiple Gateway papers of the same type could be produced (phasing the works), or an Issues Report be written seeking to advance an element of the project before the full proposal is approved.
33. Once a project has entered the Gateway process it may need to be closed earlier than the Gateway Approval routeways indicate, i.e. a project may close before any delivery has begun. Projects which need to be closed before their Authority to Start Work has been agreed can be closed with a report to the Chairman and Deputy Chairman of Projects Sub-Committee (who will note this in the 'Report on action taken' update in the next committee sitting), Corporate Projects Board (and any relevant reporting requirement to the Service Committee). This report should detail the reasons for the closure, issues that arose, a budget update and any lessons for the future and how these will be shared. Projects which need to close after agreement at Authority to Start Work, should produce an Outcome report in full. As projects are approved to proceed with Member oversight, Members must also approve their closure.
34. Outcome reports are required to be submitted to Projects Sub-Committee and relevant service committees within 6 months of the closure of the project (closure meaning handover to BAU).
  - 34.1 It may be the case that the final accounts for the project are not complete within this timeframe, business benefits require evaluation over a longer period or there are outstanding legal claims/ disputes which need to be resolved. If this is so, an Outcome report is still required within the 6-month window, however a supplementary outcome report can be produced later once final accounts are settled and disputes resolved.
  - 34.2 Where an outcome report is received by the committee, further monthly updates to the corporate project portfolio too are not required. The project will be put into a holding state on the tool until the final report is received, the Corporate Programme Office would expect progress updates to prevent a permanent holding state. Once approved by the relevant committees the project will be archived.
35. Different projects may, over the course of their development merge into one or split into two or more. This should be explicitly noted in the next report, including what the merged or split projects will be called and what they will or won't inherit from their parent projects. The Corporate Programme Office should be consulted in such cases.

## **Ringfenced Funds**

36. Ringfenced funds are those where the source and type of funding restricts the type of activities it can be spent on, this limits the City's options when it comes to project planning and design and therefore a higher financial limit is applied before these projects are called to Projects Sub-Committee. Ringfenced funds are defined by their funding source, they include; Cyclical Works Programme, Designated Sales Pools, Housing Revenue Account, Section 278, Section 106. This can include activities where an external funder is (for example TFL, Heritage Lottery) is providing funding for a restrictive purpose.
37. All projects delivered from ringfenced funds over £250,000 will follow the Approval Process from Gateway 1.
38. Any project delivered with ringfenced funds costing up to £250,000 may be authorised by the relevant Chief Officer at all stages of the Gateway Approval Process, including the authorisation of changes to projects.

## **Routine Revenue Projects**

### **Capital and Revenue**

**Capital expenditure** generally results in tangible asset(s) with a life of more than one year, for example building a new office, buying new software etc. Capital expenditure relates only to costs which are incurred in bringing a physical asset into use (excludes feasibility/option appraisal/training/launch party).

**Revenue expenditure** generally does not result in tangible assets, for example training, fees, repairs and maintenance.

If we have a large revenue project (nominally above £250k) that is subject to the Project Procedure here at the City, it is called a '**Supplementary Revenue**' projects are usually for bigger repairs and 'one-off' maintenance projects of existing infrastructure (which do not fulfil the capital criteria e.g. feasibility and option appraisal costs, major cyclical repairs and maintenance), and reflects that some of the costs can't be 'Capitalised'.

*The distinction between capital and supplementary revenue projects is an accounting decision and project managers should consult with their Finance Business Partner to assist in this determination.*

39. Routine revenue projects costing over £250,000 follow the Gateway Approval Process from Gateway 1.
40. Any routine revenue project costing up to £250,000 may be authorised by the relevant Chief Officer at all stages of the Gateway Approval Process including the authorisation of changes to projects.

## **Changes to Projects: Before agreement at Authority to Start Work**

41. During the development of a project, the confidence ranges relating to overall cost, quality and time will be determined at each Gateway on a case by case basis. Factors which will influence the establishment of the confidence range include costs that cannot be quantified with certainty and the likelihood of unexpected works, however those can be quantified and costed in a costed risk register with a costed risk provision requested [See 49].
42. The budget sought to develop the project during the early stages will be fixed

amounts agreed at each Gateway. If further resources are required, approval needs to be sought from the Projects Sub-Committee, who will scrutinize the request within the remit of project assurance, to ensure value for money and the project is on course to deliver its objectives. If further funding and resources are required, approval from the relevant committee to access the requested additional funding will be required, which may vary according to the funding source. The budget will only change after Committee approval has been granted. Where an approved costed risk provision for specific risk items agreed by Project Sub Committee, (see 'the Project Sum [46]') is used to address an issue realised, this is not considered a 'budget increase' which would warrant a return to committee. If the value of individual line items needs to be adjusted, but the overall balance remains the same (and the scope has not changed) then this can be achieved via a budget adjustment using the delegated authority levels noted in [51].

43. As the project evolves, the expectation is that the confidence range should become smaller as Officers obtain greater certainty about the project and the associated risks and issues. The confidence range for each project will need to reflect the risks particular to that project and will need to be considered on a case by case basis. This should be updated and reviewed at every Gateway report to Committee.
44. Provided that a project remains, and is forecast to remain, within the agreed confidence ranges, Officers should continue to work towards the next Gateway. Guidance is available in the Project Toolkit on the process for movement between budget lines.

### **Changes to Projects: General**

45. In cases where:
  - the financial implications will be higher or lower than the agreed confidence range (capital or revenue expenditure or income/returns/savings);
  - the overall programme needs to be accelerated or delayed +/- 10% of time against the last numbered Gateway report;
  - the specification will be significantly different to that agreed, i.e. there will be a shortfall against one of more of the key objectives/ SMART targets, or the inclusion or reduction in the parameters of the project, which may include changing operational performance criteria and business benefits;

Officers will report to the Committee(s) or Chief Officer who approved the last Gateway report on the circumstances, the options available and a recommended course of action. For example, if circumstances change on the Light and Regular routes where Authority to start work is delegated to Chief Officer, they would need to return to Committee to progress to the next gateway.

If additional unallocated City Corporation resources are required (i.e. from Central resources, not local risk budgets), the approval of the Policy and Resources Committee must also be obtained as Service Committees cannot approve Central resources.

In such cases the Policy and Resources Committee must be advised of the impact of the proposed increase in the City's overall Programme and any agree increase must be reported to the next meeting of the Resource Allocation Sub-Committee for appropriate adjustments to be made to the City Corporation's Programme.

Note that Chamberlains have prepared guidance on the preparation of Whole Life Costing (available on the corporate intranet).

These will not apply to the costed risk provision drawdown increases to budgets as they have already been considered and delegated [See 49]:

### **The Project Sum**

46. The project sum (total estimated cost of the project) is agreed at Authority to Start Work stage (Gateway 5) where it is no longer an estimate. Officers may request a costed risk provision here if there is still some uncertainty about elements of the programme, Officers need to relate such cost uncertainties to specifically identified risks. The case for allocating a specific risk-based provision will be considered on a project by project basis by the Projects Sub-Committee.
47. Projects Sub-Committee will hold a limited fund held centrally for emergency usage and the process for accessing such funds, including in cases of urgency and delegated authority, these can be accessed in extremely limited circumstances (i.e emergency Health and Safety issues). The majority of risks are expected to be identified through costed risk register. Should unexpected issues occur an Issues Report is required to Project Sub Committee. Guidance is provided in the Project Toolkit.
48. In the case of externally funded projects, Officers are expected to phase expenditure between essential and optional elements to ensure that the project sum is not exceeded. Where project works on essential elements have been completed Officers can then progress agreed optional elements.
49. Members may approve a costed risk provision budget, against Officer request, to be used against risk identified in project risk registers presented to Committee. The costed risk provision can only be used to respond to those risks (agreed by Project Sub Committee) which become issues and cannot be used for other purposes;
  - I. The value of the costed risk provision approved will vary with each Gateway, as risks are identified, mitigated, clarified and closed. A flatline value will not be accepted, see II;
  - II. Officers can request a costed risk provision at each Gateway stage on the basis of seeking a provision to deal with contingent items (should they arise) prior to the next Gateway;
  - III. Costed risk provision funding awarded for risks which are no longer relevant (closed) will be returned to the center at the next Gateway opportunity and will not be held by the project until project closure;
  - IV. With each Gateway the total value to get to the next Gateway must be asked for in full again. Projects will not 'roll forward' provisions from previous Gateways. Where an issue is in progress or still relevant, the next request should be inclusive of that.
  - V. Costed risk provision budgets will be set aside from the project budget and cannot be accessed without a budget adjustment being completed. Project Managers are expected to contact the Corporate Programme Office who will provide the relevant template and advise on the appropriate course of action;
  - VI. Officers are expected to report on the use of the funding via the Project Coversheet which will accompany any Gateway reports, and through issue logs. Each report to Committee should outline the amount of previous risk provision used, the new total requested and a cumulative total of spend throughout the project lifecycle;
  - VII. If the cumulative total of costed risk drawn down by a project exceeds or is equal to £500,000 then this will trigger an automatic Progress report to Committee detailing the reasons for the draw down.

### **Changes to Project Sum: Before agreement at Authority to Start Work**

50. The budget sought to develop the project during the early stages will be in fixed amounts. If circumstances have changed and additional budget is requested, an Issues report is required to Project Sub Committee and the relevant Service Committee, outlining the issues which have arisen, options available, the new project budget requested and a recommended course of action;
51. If additional unallocated City Corporation resources are required (i.e. from Central resources, not local risk budgets), the approval of the Policy and Resources Committee must also be obtained as Service Committees cannot approve Central resources.
52. In such cases the Policy and Resources Committee must be advised of the impact of the proposed increase in the City's overall Programme and any agreed increase must be reported to the next meeting of the Resource Allocation Sub-Committee for appropriate adjustments to be made to the City Corporation's Programme.
53. These will not apply to the costed risk provision drawdown as they have already been considered and allocated against the project budget [See 49].

### **Changes to Projects Sum: After agreement at Authority to Start Work**

54. If the cost of the project is projected to escalate over the project sum agreed at Authority to Start Work stage (or any subsequent revision to that project sum agreed by the relevant Committees) the following approvals are required.  
Note these will not apply to the costed risk provision drawdown as they have already been considered and allocated against the project budget [See 49]:

<b><i>Increase in Project Sum</i></b>	<b><i>Approval Required</i></b>
£0 to £50,000 or up to 10% (whichever is lower)	Chamberlain Chief Officer (The Town Clerk's approval will be required in projects where the Chamberlain is the named Chief Officer)
Over £50,000 or more than 10% (whichever is lower)	Service Committee Projects Sub-Committee
<b>For projects costing over £5m: Over £500,000</b>	<b>Service Committee Projects Sub-Committee Court of Common Council</b>

These revisions will be considered as cumulative, i.e. multiple changes will be added together and compared to see the total change since the last Committee paper approval.

If additional unallocated City Corporation resources are required (i.e. from Central resources, not local risk budgets), the procedure described in the table above must be followed and the approval of the Policy and Resources Committee must also be obtained as Service Committees cannot approve Central resources.

In such cases the Policy and Resources Committee must be advised of the impact of the proposed increase in the City's overall Programme and any agreed increase must be reported to the next meeting of the Resource Allocation Sub-Committee for appropriate adjustments to be made to the City Corporation's Programme.

55. For projects that follow the Gateway Approval Process those limits on increases

described above will supersede the limits as described in the Procurement Code [Procurement Code; 31.2]. Where doubt exists use the lower threshold value and tolerance. The exception being where specific risk provision in the form of a contingency has been approved by Committee for the project and this is used to increase the contract value, then the Procurement Code thresholds would apply.

56. Where an increase has been agreed under the arrangements set out in paragraph [51] above, the procedure starts again for any further increases.
57. After the total project sum has been approved at Gateway 5, on completion of the project, any remaining financial provision will be released back to the centre, which is consistent with the normal treatment of other project savings.
58. If the value of individual budget line items needs to be adjusted, but the overall balance remains the same (and the scope has not changed) then this can be achieved via a budget adjustment using the delegated authority levels noted in [50].
59. Any significant changes to the project that are not related to cost (e.g. programme, risk and specification) must be agreed by the Service Committee and Project Sub Committee.

### **Procurement and Contract Letting**

60. All projects involve procurement activity and contract letting which must be carried out in accordance with the City's agreed Procurement Regulations. City Procurement should be consulted before a Project Proposal is submitted to Corporate Projects Board.

57.1 A PT4 Procurement Form (Gateway 3) and a PT8 Procurement Form (Gateway 5) will be required where contracts for Supplies & Services are >£100k and or Works >£400k, or below where Committees/Category Boards request it.

### **Project Toolkit**

61. Guidance for Officers on how to progress between the Gateways together with the necessary documentation and processes to follow is provided in the Project Toolkit maintained by the Town Clerk's Programme Office and published on the Corporate intranet.

58.1 Projects Managers are expected to record and report on their project status during the project's lifetime. The 'project status' is expressed in its simplest form as a RAG status (aka Red, Amber, Green). The Project Toolkit gives further guidance on what conditions necessitate a change in RAG status.

62. The Corporate project management templates including the Gateway templates fall within the remit of Projects Sub-Committee and will be periodically updated by the Corporate Programme Office to respond to events or changing needs to the governance of the City's Projects, to ensure that projects are well run.



## **Glossary of Terms**

<b>Term</b>	<b>Definition</b>
Budget	The (predicted) cost of the total package of activity on a project, itemised into different line items such as Staff, Works, Fees etc. This may change according to each Gateway. This is the allowable limit of funding which could be allocated against a project following senior approval, however it is not the actual allocation of the money itself.
COCO	Court of Common Council
Costed Risk Provision	Funding allocated to project budgets to deal with contingent items should they arise. This can be under delegation (subject to Member approval of a costed risk register).
Funding	The money available for a project to spend within the agreed budget.
Gateway 1 – Project Briefing	First stage in the process where a Project Briefing document is completed to outline the premise of the project.
Gateway 2 - Project Proposal	Proposal to establish a project via Member approval of a Gateway 2 report. A small budget for feasibility studies/surveys is usually requested at this stage to develop an options appraisal.
Gateway 3/4 – Options Appraisal	Outline of alternative approaches for delivering the project objectives. Complex projects require an additional detailed options appraisal.
Gateway 5 – Authority to Start Work	Stage at which approval is granted to commence project delivery. This is usually following tender and is where a contractor is appointed. It is also the final review stage before the start of works. Authority to start work is delegated to Chief Officers for Light and Regular projects.
Gateway 6 – Outcome Report	Project closure stage where an outcome report analysing lessons learned and project evaluation is submitted to Committee.
Gateway Process	Current governance procedures for projects within the City Corporation. Projects proceed incrementally through stages subject to committee approval.
(an) Issue	Issues are risks that have happened. It is quite common to hear people use the terms 'risk' and 'issue' interchangeably, but they are distinct.
Issues Report	Reports outlining issues which could impact on project delivery and require attention. Issues reports can be submitted at any stage.
P & R	Policy and Resources Committee

Total Project Sum	The total actual cost to design and deliver the project from start to finish, including fees, works, staffing etc. This will be fixed at Authority to Start Work and can only vary through Issues Reports requesting a budget adjustment. Costed risk provision for items agreed by Project Sub Committee can be utilised under delegation but these will not be deemed budget adjustments
Progress Report	Updates on latest developments (usually during project delivery but these can be submitted at any point in time).
Project Briefing Document (applied at Gateway 1)	Document to ensure everybody understands the premise of the project and key information has been captured (such as the purpose and objectives).
Project Cover Sheet	Fixed sheet to remain with projects throughout their lifecycle (once funding has been allocated). This will cumulatively track changes throughout the process and provide an overview of progress.
Projects Procedure	Framework for application of projects (agreed by Policy and Resources Committee/Court of Common Council) to ensure consistency in how projects are delivered across the organisation.
Project Vision/ Cora PPM	Corporate project management software. Used to collect and report on the City's project portfolio.
(a) Risk	A risk can be defined as "the effect of uncertainty on our objectives". It can also be expressed as the chance of something affecting our business objectives. Once realised it becomes an Issue.
Risk Register	A Risk Register provides a means of recording the identified risks, the analysis of their severity and an outline of the response to be taken should they occur. The Risk Register should clearly identify which action steps will need to be taken, by whom, and by when. This is the basis on which information will be presented to PSC for decisions on allocations of a costed risk provision.
SRG	Strategic Resources Group (officer board)
Total Estimated cost	The total estimated cost to design and deliver the project from start to finish, including fees, works, staffing etc. As you proceed through the gateway process, you will vary this total incrementally and any costed risk provision drawn down should be included in the next update to the total estimated cost.

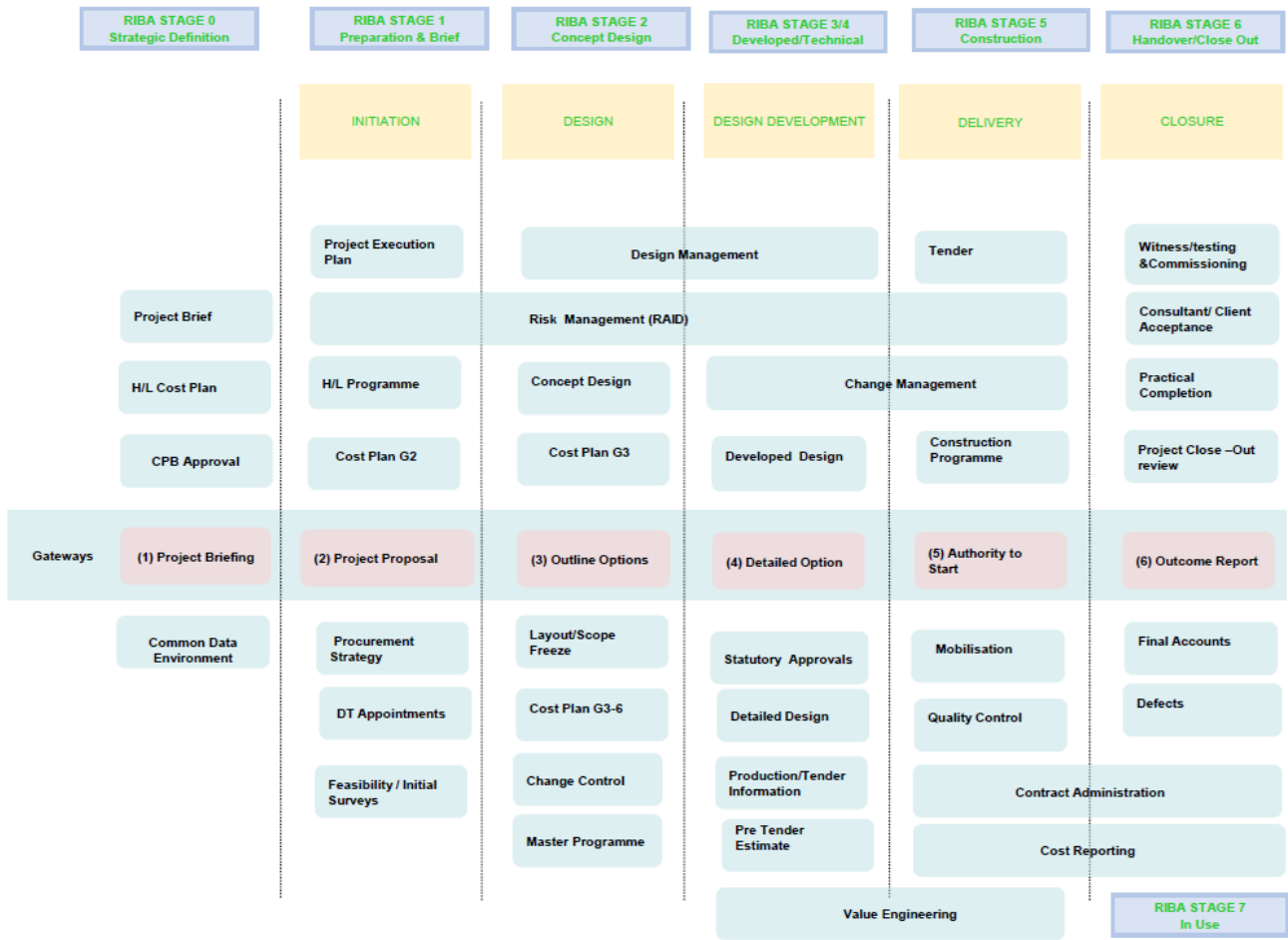
## **Documents needed for Each Gateway**

*Note different departments may require documentation in addition to these listed.*

<b>Gateway Paper</b>	<b>Expected Documentation</b>
<b>Gateway 1:</b> Project Briefing	<ul style="list-style-type: none"> <li>• Project Briefing template</li> </ul>
<b>Gateway 2:</b> Project Proposal	<ul style="list-style-type: none"> <li>• Project Proposal template</li> <li>• Project Briefing (Appendix)</li> <li>• Project Risk register (Appendix) <i>where costed risk provision requested.</i></li> <li>• City Procurement Reference number (allocated)</li> </ul>
<b>Gateway 3-4:</b> Options Appraisal	<ul style="list-style-type: none"> <li>• Options Appraisal Template</li> <li>• Project Coversheet (Appendix)</li> <li>• PT4 Procurement Form (Appendix) <i>Where contracts for Supplies &amp; Services are £100k and or Works £400k, or below where Committees/Category Boards request it.</i></li> <li>• Project Risk register (Appendix) <i>where costed risk provision requested.</i></li> </ul>
<b>Gateway 3:</b> Options Appraisal	<ul style="list-style-type: none"> <li>• Options Appraisal Template</li> <li>• Project Coversheet (Appendix)</li> <li>• PT4 Procurement Form (Appendix) <i>Where contracts for Supplies &amp; Services are £100k and or Works £400k, or below where Committees/Category Boards request it.</i></li> <li>• Project Risk register (Appendix) <i>where costed risk provision requested.</i></li> </ul>
<b>Gateway 4:</b> Detailed Options Appraisal	<ul style="list-style-type: none"> <li>• Options Appraisal Template</li> <li>• Project Coversheet (Appendix)</li> <li>• Project Risk register (Appendix) <i>where costed risk provision requested.</i></li> </ul>
<b>Gateway 4a:</b> Inclusion in the Capital Programme	<ul style="list-style-type: none"> <li>• The previous Gateway paper, unless the next one (i.e. Gateway 5) is complete.</li> <li>• Project Coversheet (Appendix)</li> <li>• Project Risk register (Appendix) <i>where costed risk provision requested.</i></li> </ul>
<b>Gateway 4b:</b> Approval of the Court of Common Council	<ul style="list-style-type: none"> <li>• Court Report Template, drafted by Court Clerks with Project Manager assistance.</li> </ul>
<b>Gateway 4c:</b> Detailed Design	<ul style="list-style-type: none"> <li>• Detailed Design Template</li> <li>• Project Coversheet (Appendix)</li> <li>• Project Risk register (Appendix) <i>where costed risk provision requested.</i></li> </ul>
<b>Gateway 5:</b> Authority to Start Work	<ul style="list-style-type: none"> <li>• Project Coversheet (Appendix)</li> <li>• PT8 Procurement Form (Appendix) <i>Where contracts for Supplies &amp; Services are £100k and or Works £400k, or below where Committees/Category Boards request it.</i></li> <li>• Project Risk register (Appendix) <i>where costed risk provision requested.</i></li> </ul>
<b>Gateway 6:</b> Outcome Report	<ul style="list-style-type: none"> <li>• Outcome report template</li> <li>• Project Coversheet (Appendix)</li> <li>• Issues log (Appendix) <i>where specific risk provision used.</i></li> </ul>
<b>Issues / Progress Report</b>	<ul style="list-style-type: none"> <li>• Standard Issues or Progress Report Template</li> <li>• Project Coversheet</li> <li>• PT8 Procurement Form (Appendix) <i>Where a recommendation for approval is being made</i></li> <li>• Any supporting project specific attachments</li> </ul>

**Appendix 1: Mapping RIBA stages to the Gateway approval process**  
*Developed by City Surveyors, Property Projects Group.*

**PROJECT DELIVERY METHODOLOGY**



# Report – Hospitality Working Party of the Policy and Resources Committee

## Applications for Hospitality

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

### (a) **150<sup>th</sup> Anniversary of the Office of Parliamentary Counsel**

The Office of the Parliamentary Counsel is responsible for drafting Government bills and for giving legal advice to Government on matters relating to parliamentary bills. The Office was founded in 1869.

It is proposed that, to mark the 150<sup>th</sup> anniversary, the City Corporation hosts a lecture given by First Parliamentary Counsel, Elizabeth Gardiner, followed by an early evening reception and small dinner. Guests would include Parliamentary Counsel and senior members of the Government Legal Department, members of the Judiciary, Government Ministers and senior civil servants, academics and representatives from the public law Bar and relevant firms of solicitors.

It is therefore **recommended** that hospitality be granted for a lecture, followed by an early evening reception and small dinner, to mark the 150<sup>th</sup> anniversary and that arrangements are made under the auspices of the Policy and Resources Committee; costs to be met within approved parameters.

The host element would be the Policy and Resources Committee and Members with relevant interests.

### (b) **Honourable Artillery Company Parade and Reception**

The Honourable Artillery Company (HAC), formed in 1537 under a charter granted by King Henry VIII, is Britain's oldest regiment. The HAC has always had a very close connection with the City Corporation and City of London, with it originally being formed of citizens of London, and until 1778 only Freemen of the City being eligible for membership. The HAC regularly supports the City at a number of high-profile events including State Banquets, Remembrance Sunday and the Lord Mayor's Show.

It is proposed that the City Corporation hosts a parade in Guildhall Yard followed by a reception in Guildhall during spring / summer 2019 to mark the Honourable Artillery Company's service during the First World War. Guests would include the Colonel Commandant and serving members of HAC, representatives from the City Lieutenancy, City Schools and Academies, Livery Companies with connections to the HAC and representatives from the City's Privileged Regiments.

It is therefore **recommended** that hospitality be granted for an early evening reception following a parade in Guildhall Yard to mark the HAC's service during the First World War and that arrangements be made under the auspices of the Hospitality Working Party; costs to be met within approved parameters.

This would be a full court event.

**(c) London's Small Museums Reception**

There are over 300 museums in London ranging from major national museums such as the British Museum and the Tate to medium-sized and smaller museums. The City Corporation supports the Museum of London, and runs Guildhall Galleries, Keats House, Tower Bridge Museum, Monument and the City of London Police Museum.

Over the last twelve months in the City, museums and galleries have attracted over 5 million visitors, just under 80% of all visits to City attractions, demonstrating their significant value to the tourism economy.

It is proposed that the City Corporation hosts an early evening reception to recognise the contribution small museums make to London. This would demonstrate the City Corporation's commitment to promoting the City as an important cultural hub, provide an opportunity to engage with stakeholders within the cultural sector and highlight the City's cultural initiatives including the Culture Mile. It would also be an occasion on which to celebrate the opening of a new museum in the City of London, with the relocation next year of the Museum of Philatelic History to the City.

It is therefore **recommended** that hospitality be granted for an early evening reception to celebrate London's small museums and that arrangements are made under the auspices of the Culture Heritage and Libraries Committee; costs to be met within approved parameters.

This would be a full court event.

DATED this 15<sup>th</sup> day of November 2018

SIGNED on behalf of the Working Party.

**John Scott**  
Chief Commoner and Chairman, Hospitality Working Party

## Report – Policy & Resources and Finance Committees

### Brexit Contingency Fund

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

#### SUMMARY

Following the referendum on the UK's membership of the European Union (EU), the UK will be leaving the EU on 29 March 2019. There is currently a significant level of uncertainty on the terms under which the UK will leave and the future trading relationship it will have going forward.

The outcome of these negotiations will be a key influence on the City Corporation achieving its vision of being “dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK” as well as impacting on its ability to deliver its day to day services. It is anticipated that significant engagement activities will be required in the lead up to and post exit from the EU; however, no resources are currently allocated for this additional activity and there is likely to be insufficient provision within the existing Policy Initiatives Fund or Finance Committee Contingency to meet need.

To achieve its strategic aims during this period, as well as to manage the risks to service delivery, it is **recommended** that a Brexit Contingency Fund of £2m be established in 2018/19 to support the organisation through this period, overseen by the Policy and Resources Committee. It is proposed that the fund is available in the current and following financial year covering the period of negotiation and transition to the new operating environment, with any unspent balance in 2018/19 carried forward into 2019/20.

#### RECOMMENDATIONS

Members are asked to endorse the creation of a Brexit Contingency Fund of £2m in 2018/19 with provision to carry forward any unspent balance into 2019/20.

#### MAIN REPORT

##### Background

1. The referendum held on 28 June 2016 concerning the UK's membership of the EU resulted in a majority vote to leave the EU. This has triggered a complex set of negotiations between with UK Government and the EU on the terms of the UK's withdrawal and the future trading relationship between the UK and EU.
2. The uncertainty in the negotiations and future working relationship has created several risks for the City of London Corporation linked to delivering its strategic objective of supporting a thriving UK economy and continuing to deliver its

services. Whilst the nature of any future working relationship and the associated impact are unknown, it is likely that increased engagement activity and possible additional costs associated with service delivery in some areas will be necessary. It is therefore prudent to put in place the requisite arrangements now, to facilitate timely activity in the coming period.

3. Under these circumstances, the Policy and Resources Committee proposed that a Brexit Contingency Fund should be established aimed at supporting the City through this period. Your Finance Committee has also endorsed this proposal.

#### **Current Position**

4. The risks to the City from the current uncertainty have recently been added to the Corporate Risk Register as detailed in a report to the Audit and Risk Management Committee on 6 November 2018. Appendix 1 provides details of these risks.
5. Chief Officers have been asked to address these risks and a task and finish group has been established to take an overview of the City Corporation's preparations, to ensure the impact of Brexit on key service areas is minimised.
6. In considering these risks and the range of possible outcomes that could come into play as negotiations progress, access to a flexible fund to enable departments to respond quickly to the changing landscape and influence the direction of travel would contribute to mitigating the impact of the current uncertainty.

#### **Proposals**

7. The objective of establishing a Brexit Contingency Fund would be focused on delivering the following outcomes:
  - a. Communicate the interests of the City as part of the negotiation process through engagement with key stakeholders. These activities should be distinct from those carried out under the Policy Initiative Fund (PIF) and, therefore, should be new activities focused on Brexit specific issues.
  - b. Help mitigate the risks identified in the Corporate Risk Register (see Appendix 1). Requests for funding under this heading should be clear on how Brexit has affected the issue and how this is distinct from general services changes/pressures. It is anticipated that defined outcomes should be set out for any bids under this heading.
  - c. Manage any urgent unforeseen issues arising from Brexit. Due to the lack of clarity on the future UK position, new risks and pressures could emerge once a final agreement has been reached. As with point b, any bid under this heading will need to be clear on the Brexit impact of any issue and how this is distinct from general service changes/pressures.
8. To ensure that the fund allocation process is responsive to emerging needs, your Finance and Policy and Resources Committees have agreed that bids of up to £100k should be delegated to the Town Clerk, in consultation with the Chairman and Deputy Chairman of the Policy and Resources Committee, to agree and allocate funds. Bids above that level would be subject to consideration by the full Policy and Resources Committee (or under urgency procedures, with all



Members being informed of the proposals, where the need is too urgent to wait until the next scheduled meeting).

9. All bids will need to set out how the request meets the above outcomes and confirm that other sources of funding have been explored before submitting a request to this fund. This will ensure that existing funds and activities have been reviewed and reprioritised before additional funds are allocated. Bids should not request funding beyond 2019/20.
10. All agreed bids will be required to report back to Committee on the outcomes achieved through the funding provided. Subject to the volume of bids, it is anticipated that this will be via a single report produce every six months setting out the achievements to date. Financial reporting on the fund's balance and any expenditure will be provided on a monthly basis.

### **Corporate & Strategic Implications**

11. The aim of the fund is to enable the City to achieve its corporate and strategic objectives during this period of instability and change.

### **Implications**

12. It is proposed that £2m of funding be allocated in 2018/19 to the Brexit Contingency Fund with provision to carry forward any unspent balance into 2019/20. The allocation will be funded from City's Cash. This amount is deemed a reasonable sum considering the likely activities required but, given the uncertainty in the negotiations and the scale of change, this sum may need to be re-evaluated as more information becomes available. Any unspent funds at the end of 2019/20 will be remitted back to the City's Cash Fund balance.

### **Conclusion**

13. Due to the ongoing uncertainty of the Brexit negotiations and the potential risks this poses to the City of London, it is proposed that a Brexit Contingency Fund be established to help manage the transition to the new operating environment. This fund will be overseen by the Policy and Resources Committee where bids to utilise this fund will be submitted for approval. The fund will be available in the current and following financial year.

### **Appendices**

- Appendix 1 – Corporate Risk Register Entry for Brexit Risk.

All of which we submit to the judgement of this Honourable Court.

DATED this 15<sup>th</sup> day of November 2018.

SIGNED on behalf of the Committee.

**Catherine McGuinness, Deputy**  
Chairman, Policy and Resources Committee

**Jeremy Mayhew**  
Chairman, Finance Committee

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## CR26 Brexit risk

**Report Author:** Paul Dudley

**Generated on:** 19 October 2018



Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
<b>CR26 Brexit</b> 17-Oct-2018 John Barradell	<p><b>Cause</b> – The outcome of Brexit negotiations does not secure continuity of contracts, access to talent, ongoing grant funding and/or security of supply chains</p> <p><b>Event</b> – The City Corporation services fail to prepare appropriately for the UK departure from the EU in March 2019</p> <p><b>Effect</b> – There are a range of potential impacts. The City Corporation's services are disrupted as supply chains and contracts are reassessed, potentially increasing cost and reprioritisation of resources. Uncertainty over multi-year grants may undermine the City Corporation's ability to deliver or commit to services. The City Corporation may be unable to access the specialist talent and supply chains it needs to deliver some of its services.</p>	 Likelihood Impact	6		 Likelihood Impact	4	29-Mar-2019	 Constant

Action no	Description	Latest Note	Action owner	Latest Note Date	Due Date
CR26a	Ensure that appropriate Brexit related risks are identified, assessed, mitigated recorded on departmental risk registers	<p>Officers to identify appropriate mitigations:</p> <ul style="list-style-type: none"> <li>Impact of Brexit on the recruitment and retention of City Corporation staff (Owner: Director)</li> </ul>	Simon Latham	17-Oct-2018	29-Mar-2019

		of Human Resources) <ul style="list-style-type: none"> <li>• Impact of Brexit on City Corporation procurement and supply chains (Chamberlain/Commercial Director)</li> <li>• Impact of Brexit on the movement of goods through the Port Health Authority functions (Director of Markets &amp; Consumer Protection)</li> <li>• Impact of Brexit on City Corporation income streams (Chamberlain)</li> <li>• Impact of Brexit on the attractiveness of London for workers, businesses and visitors (Director of Economic Development)</li> <li>• Impact of Brexit on the regulatory landscape covering City Corporation services (Remembrancer)</li> <li>• Impact of Brexit on local communities (Director of Community &amp; Children's Services)</li> </ul>			
CR26b	Progress on all departmental Brexit risks and their mitigations be reported monthly to Summit Group		Simon Latham		29-Mar-2019



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# Report – Planning and Transportation Committee

## Annual On-Street Parking Accounts 2017/18 and Related Funding of Highway Improvements and Schemes

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

### SUMMARY

The City of London in common with other London authorities is required to report to the Mayor for London on action taken in respect of any deficit or surplus in its On-Street Parking Account for a particular financial year.

The purpose of this report is to inform Members that:

- the surplus arising from on-street parking activities in 2017/18 was £14.523m;
- a total of £4.664m, was applied in 2017/18 to fund approved projects; and
- the surplus remaining on the On-Street Parking Reserve at 31st March 2018 was £29.980m, which will be wholly allocated towards the funding of various highway improvements and other projects over the medium term.

### RECOMMENDATION

That Members note the contents of the report and approve its submission to the Mayor of London.

### MAIN REPORT

#### Background

1. Section 55(3A) of the Road Traffic Regulation Act 1984 (as amended), requires the City of London in common with other London authorities (i.e. other London Borough Councils and Transport for London), to report to the Mayor for London on action taken in respect of any deficit or surplus in their On-Street Parking Account for a particular financial year.
2. Legislation provides that any surplus not applied in the financial year may be carried forward. If it is not to be carried forward, it may be applied by the City for one or more of the following purposes:
  - a) making good to the City Fund any deficit charged to that Fund in the four years immediately preceding the financial year in question;

- b) meeting all or any part of the cost of the provision and maintenance by the City of off-street parking accommodation whether in the open or under cover;
  - c) the making to other local authorities, or to other persons, of contributions towards the cost of the provision and maintenance by them, in the area of the local authority or elsewhere, of off-street parking accommodation whether in the open or under cover;
  - d) if it appears to the City that the provision in the City of further off-street parking accommodation is for the time being unnecessary or undesirable, for the following purposes, namely:
    - meeting costs incurred, whether by the City or by some other person, in the provision or operation of, or of facilities for, public passenger transport services;
    - the purposes of a highway or road improvement project in the City;
    - meeting the costs incurred by the City in respect of the maintenance of roads at the public expense; and
    - for an “environmental improvement” in the City.
  - e) meeting all or any part of the cost of the doing by the City in its area of anything which facilitates the implementation of the Mayor’s Transport Strategy, being specified in that strategy as a purpose for which a surplus can be applied; and
  - f) making contributions to other authorities, i.e. the other London Borough Councils and Transport for London, towards the cost of their doing things upon which the City in its area could incur expenditure upon under (a)-(e) above.
3. In the various tables of this report, figures in brackets indicate expenditure, reductions in income or increased expenditure.

#### **2017/18 Outturn**

4. The overall financial position for the On-Street Parking Reserve in 2017/18 is summarised below:

	£m
Surplus Balance brought forward at 1st April 2017	20.121
Surplus arising during 2017/18	14.523
Expenditure financed during the year	(4.664)
<b>Funds remaining at 31<sup>st</sup> March 2017, wholly allocated towards funding future projects</b>	<b>29.980</b>



5. Total expenditure of £4.664m in 2017/18 was financed from the On-Street Parking Reserve, covering the following approved projects:

<b>Revenue/SRP Expenditure:</b>	<b>£000</b>
Highway resurfacing, maintenance & enhancements	(2,241)
Concessionary fares & taxi card scheme	(493)
Bank Junction experimental safety scheme	(443)
Off-Street car parking costs funded from reserves	(225)
Special needs transport	(78)
Minories car park structural building report	(45)
HVM security team	(32)
Temple Area traffic review	(31)
Dominant House footbridge repairs	(24)
Barbican Podium waterproofing	(14)
Beech Street tunnel	(6)
Cleansing / planting maintenance / other	(2)
<b>Total Revenue/SRP Expenditure</b>	<b>(3,634)</b>
<b>Capital Expenditure:</b>	
Street Lighting project	(720)
Aldgate	(257)
Beech Gardens Barbican Podium waterproofing	(48)
Milton Court highway works S278	(5)
<b>Total Capital Expenditure</b>	<b>(1,030)</b>
<b>Total Expenditure Funded in 2017/18</b>	<b>(4,644)</b>

6. The surplus on the On-Street Parking Reserve brought forward from 2016/17 was £20.121m. After expenditure of £4.644m funded in 2017/18, a surplus balance of £9.859m was carried forward to future years to give a closing balance at 31st March 2018 of £29.980m.
7. Currently total expenditure of some £81.364m is planned over the medium term from 2018/19 until 2022/23 (as detailed in Table 1), by which time it is anticipated that the existing surplus plus those estimated for future years will be fully utilised.
8. The total programme covers numerous major capital schemes including funding towards the Street Lighting project; HVM security bollards; Thames Court footbridge; Barbican Podium waterproofing & Highwalk remedial works; repairs to Holborn Viaduct & Snow Hill pipe subways; Temple Area traffic review; London Wall car park waterproofing, joint replacement & concrete repairs; Dominant House footbridge repairs; and Bank Junction permanent safety scheme.
9. The programme also covers ongoing funding of revenue projects the main ones being highway resurfacing, enhancements & road maintenance projects; concessionary fares & taxi cards; contributions to the costs of Off-Street car parks; Bank Junction experimental safety scheme; Minories car park structural

building report; and special needs transport. The progression of each individual scheme is, of course, subject to the City's normal evaluation criteria and Standing Orders.

10. A forecast summary of income and expenditure arising on the On-Street Parking Account and the corresponding contribution from or to the On- Street Parking Surplus, over the medium-term financial planning period, is shown below:

<b>Table 1 On-Street Parking Account Reserve Projections 2017/18 to 2022/23</b>	<b>2017/18 Actual £m</b>	<b>2018/19 Forecast £m</b>	<b>2019/20 Forecast £m</b>	<b>2020/21 Forecast £m</b>	<b>2021/22 Forecast £m</b>	<b>2022/23 Forecast £m</b>	<b>Total £m</b>
Income	21.0	16.9	15.5	14.6	13.9	13.4	95.3
Expenditure ( <i>Note 1</i> )	(6.5)	(4.2)	(4.6)	(4.6)	(4.7)	(4.8)	(29.4)
<b>Net Surplus arising in year</b>	<b>14.5</b>	<b>12.7</b>	<b>10.9</b>	<b>10.0</b>	<b>9.2</b>	<b>8.6</b>	<b>65.9</b>
Capital, SRP and Revenue Commitments	(4.6)	(20.6)	(26.7)	(16.0)	(9.3)	(8.8)	(86.0)
<b>Net in year contribution (from)/ to surplus</b>	<b>9.9</b>	<b>(7.9)</b>	<b>(15.8)</b>	<b>(6.0)</b>	<b>(0.1)</b>	<b>(0.2)</b>	<b>(20.1)</b>
(Deficit) / Surplus cfwd at 1 <sup>st</sup> April	20.1	30.0	22.1	6.3	0.3	0.2	
<b>(Deficit) / Surplus cfwd at 31<sup>st</sup> March</b>	<b>30.0</b>	<b>22.1</b>	<b>6.3</b>	<b>0.3</b>	<b>0.2</b>	<b>0.0</b>	

*Note 1: On-Street operating expenditure relates to direct staffing costs, repair & maintenance of pay & display machines, Indigo contractor costs, fees & services (covering cash collection, pay by phone, postage & legal), IT software costs for enforcement systems, provision for bad debts for on-street income and central support recharges.*

11. A noticeable increase in income has been generated since 2017/18 due to the Bank Junction Experimental Safety Scheme, that has since been made permanent following agreement at Court of Common Council on 13<sup>th</sup> September 2018. Depending upon future motorist's compliance, these forecast future income streams may need refining.
12. There is now a combined service for 'Civil Parking & Traffic Enforcement, including the Cash Collection Contract' which has resulted in on-going savings to the operating costs of the On-Street Parking Account.

### **Conclusion**

13. So that the City Corporation can meet its requirements under the Road Traffic Regulation Act 1984 (as amended), it is requested that the Court of Common Council notes the contents of this report and approves its submission to the Mayor of London.

All of which we submit to the judgement of this Honourable Court.

DATED this 20<sup>th</sup> day of November 2018.

SIGNED on behalf of the Committee.

**Christopher Michael Hayward**  
Chairman, Planning and Transportation Committee

## Report – Planning and Transportation Committee

### Gateway 4b: Blackfriars Bridge Parapet Refurbishment and Bridge Re-Painting

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

#### **SUMMARY**

Gateway 3/4 approval has been provided for a full refurbishment of Blackfriars Bridge with repair and replacement of the cast iron features as required; working around the current access restrictions. The project will significantly improve the aesthetics of the structure and protect its fabric. It will also repair the parapets to prevent future water ingress and protect the structure.

Since Project Proposal (Gateway 2), estimated costs have increased by £3,570,000 owing to better understanding of the full implications of the access restrictions, particularly because of the Tideway Tunnel works site. The increase in cost now means that the estimated total cost of the project is £8,570,000 and the Court's approval to proceed at Gateway 4b is therefore now sought.

If the project is not progressed, the appearance of the bridge will further deteriorate and ultimately, the lifespan of the structure will be significantly reduced. The City would also be seen to be failing to meet its obligations under the Blackfriars Bridge Act 1863 and the Corporation of London (Bridges) Act 1911 to maintain and repair the bridge.

The next step will be to progress the project to Gateway 5 (expected October 2019).

#### **RECOMMENDATION**

That the Court of Common Council's approval be given to the progression of the programme of works from Gateway 4b to Gateway 5.

#### **MAIN REPORT**

##### **Background**

1. Following approval for the project at Gateway 2, AECOM produced a study to identify the options around refurbishing the bridge. The options appraisal included a number of considerations. It was generally felt that the repainting and repair/replacement option would minimise ongoing revenue implications on maintenance and also serve to preserve the original cast iron parapet. The parapet has been shown to be of sufficient strength and therefore appropriate repair will also minimise any issues with the adjacent structure.

2. The study was presented to Members and the option approved by the Planning and Transportation Committee includes the replacement of some of the baluster columns as required, repair of other cast iron elements as required, a repainting of the whole bridge (subject to access restrictions) and continuous work to refurbish the whole bridge (subject to the approval of working methodology from all relevant stakeholders).
3. The recommended option is over the Official Journal of the European Union (OJEU) tender limit and so a full OJEU tender process will need to take place for the works contract. The design work shall be carried out by AECOM.

**Proposal**

4. It is recommended that a full refurbishment of Blackfriars Bridge, with repair and refurbishment of the cast iron features as required, be undertaken.

**Financial Implications**

5. The estimated total cost of the project is £8,570,000.

**Conclusion**

6. The Court is asked to approve this Gateway 4b report to enable the programme of works to proceed.

All of which we submit to the judgement of this Honourable Court.

DATED this 30<sup>th</sup> October 2018.

SIGNED on behalf of the Committee.

**Christopher Hayward**  
Chairman, Planning and Transportation Committee

## Report – Epping Forest and Commons Committee

### Appointment of a Verderer of Epping Forest

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

#### **SUMMARY**

The Epping Forest and Commons Committee is made up of 12 Common Councilmen and 4 Verderers of Epping Forest, as specified by the Epping Forest Act (1878).

Following the untimely death in service of Peter Adams MBE, who served as a Verderer of Epping Forest since January 1997 until 6 April 2018, and in accordance with the Epping Forest Act (1878), the Epping Forest and Commons Committee appointed a working party to recruit to this position. The recruitment process is now complete, and the Epping Forest and Commons Committee unanimously recommend that Nicholas Munday be appointed as Epping Forest Verderer (South).

#### **RECOMMENDATIONS**

The Court of Common Council is invited to endorse the appointment of Nicholas Munday as Epping Forest Verderer (South) and to note the proposal that future Verderer appointments are put to it for information only.

#### **MAIN REPORT**

##### **Background**

1. The Epping Forest and Commons Committee is made up of 12 Common Councilmen and four Verderers of Epping Forest. Following the untimely death in service of Peter Adams MBE a vacancy for Verderer arose which the Epping Forest and Commons Committee sought to fill.
2. On 9<sup>th</sup> July 2018 the Epping Forest and Commons Committee nominated a working party comprising of the Chairman, Deputy Chairman, two Common Councilmen, two Verderers and the Director of Open Spaces to oversee the recruitment process.
3. Advertisements opened online on 20 July 2018 with a closing date of midday on Monday 3<sup>rd</sup> September 2018, with copy in the print editions of City AM and Epping Forest Guardian. The vacancy was also promoted through social media channels.

4. Five applications were received by the closing date. All of the applicants met the criteria laid out in the Epping Forest Act (1878) in that they were all resident in one of the ancient Forest parishes and were not elected members of the City of London Corporation.
5. The Working Party interviewed all five applicants on Wednesday 17<sup>th</sup> October 2018 at The Warren.
6. After structured interviews and the application of agreed scoring criteria the Working Party unanimously agreed that Nicholas Munday should be recommended for approval as the new Verderer of Epping Forest.
7. At their meeting on 19 November 2018, the Epping Forest and Commons Committee considered the working party's proposal and unanimously agreed to recommend to the Court of Common Council that Nicolas Munday be appointed as the new Verderer of Epping Forest.
8. Historically, and in accordance with Section 30(7) of the Epping Forest Act 1878, the Epping Forest and Commons Committee make a recommendation to the Court of Common Council in respect of the appointment of a Verderer of Epping Forest. However, under section 30(7), it clearly states that "Casual vacancies among the verderers caused by death, resignation, disqualification, or otherwise shall be filled by the Conservators...". Legal advice has further clarified that, under section 31(1) of the Act (which reads "There shall be a committee for the purposes of this Act styled the Epping Forest Committee (in this Act referred to as the committee), which committee shall, subject to the provisions of this Act, have authority to exercise the powers and discretion and do the acts which the Conservators are by this Act empowered to exercise and do."), and the terms of reference of the Epping Forest and Commons Committee, the Committee technically has the power to fill these types of vacancy itself, without reference to the Court.
9. The Committee are, nevertheless, keen to honour previous custom and practice and to be consistent with the procedure set out in recent reports. As such, this appointment is presented for the formal endorsement of the Court. It is, however, intended that all future appointments of this nature be presented to the Court for information only, subject to any views the Court may have.

#### **Corporate & Strategic Implications**

10. This process fulfils the obligation on the City of London under Section 30(7) of the Epping Forest Act, namely:

*Casual vacancies among the verderers caused by death, resignation, disqualification, or otherwise shall be filled by the Conservators from among persons qualified to be elected verderers; but a person appointed to fill a casual vacancy shall be entitled to hold office so long as the vacating verderer would have been entitled to hold office.*

**Conclusion**

11. The Court of Common Council is accordingly asked to agree the appointment of Nicholas Munday as Verderer of Epping Forest, until the septennial elections in 2020 and to note the proposal around future Court reports of this nature being for information only subject to any views the Court may have on this.

All of which we submit to the judgement of this Honourable Court.

DATED this 19<sup>th</sup> day of November 2018.

SIGNED on behalf of the Committee.

**Philip John Woodhouse, Deputy**  
Chairman, Epping Forest and Commons Committee

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# Report – Licensing Committee

## Gambling Act 2005: Review of Statement of Licensing Principles

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

### SUMMARY

The Gambling Act 2005 requires all licensing authorities to produce and publish a Statement of Licensing Principles ('policy'). The City Corporation produced its first such statement, as prescribed by the statutory timetable, at the time the Act came into force in January 2007.

The legislation requires that all authorities review their policy at least every three years. This policy was last reviewed in January 2016 and therefore is required to be reviewed by January 2019.

The City Corporation has now completed its work on producing a Local Area Profile in order that licensees can fully assess the local risk to the licensing objectives posed by their gambling operations. The Policy is therefore being reviewed earlier than statutorily required to include this work.

The updated Policy (Appendix 1) and the two documents 'Local Area Profile' (Appendix 2) and the 'Guidance on Undertaking Risk Assessments' (Appendix 3) formed the basis of the proposals which went out to consultation.

### RECOMMENDATION

Members are **recommended** to:

- agree the draft Statement of Licensing Principles (set out at Appendix 1), The Gambling Local Area Profile (set out at Appendix 2) and the Guidance on Undertaking Local Gambling Risk Assessments (set out at Appendix 3).

### MAIN REPORT

#### Background

1. The Gambling Act 2005 (the 'Act') requires licensing authorities to prepare and publish a statement of licensing principles (the 'policy') that they will apply in exercising their functions under the Act. The legislation further prescribes that the policy shall remain valid for a period of three years, after which it must be reviewed and re-published.
2. In order to comply with the statutory process, the City Corporation consulted with the following:

- The Chief Officer of Police for the City of London;
  - Persons representing the interests of persons carrying on gambling businesses within the City of London;
  - Persons representing the interests of persons who may be affected by the City Corporation exercising its functions under the Act.
3. The Gambling Commission has produced a Guidance to Licensing Authorities 5<sup>th</sup> Edition (the 'Guidance') and a document entitled 'Licence Conditions and Codes of Practice' (LCCP). The latest LCCP contained:
    - A new social responsibility code provision relating to the assessment of local risk;
    - A new ordinary code provision relating to shared risk assessments.
  4. The social responsibility code provision requires licensees to assess the local risk to the licensing objectives posed by their gambling operations at each of their premises. In making these assessments, licensees must take into account relevant matters identified in the corporation's licensing policy.
  5. The new ordinary code provision requires operators to share their risk assessment with licensing authorities when applying for a premises licence or a variation, or otherwise on request. The effect of this is that when an application is submitted, the authority can expect to see how risks which it has identified in its policy are to be mitigated.
  6. The City's current policy was largely based on a concise template drafted by the Local Authority Coordinating Body on Regulatory Services (now Local Government Regulation) with additions to specifically suit the City of London and amended to reflect Government changes to published guidance. By using this template, the City Corporation has ensured that the statutory requirements and inclusions recommended by the Guidance were adhered to.
  7. However, following the release of the LCCP the Gambling Commission published a special bulletin making it clear that the national templates (from which the Policy was drafted) were unlikely to fully and adequately address local concerns, risks and features of the gambling landscape. This in turn would mean that licensees would not have sufficient information on which to base their newly required risk assessments.
  8. The Gambling industry as controlled by the Gambling Act 2005 has a relatively light impact on the City of London. The City is not permitted to have a casino and has no Bingo establishments or Adult Gaming Centres.

Premises licensed within the City are currently as follows:

- |                                      |    |
|--------------------------------------|----|
| • Betting Shops                      | 36 |
| • Gaming Machine Permits (2 or less) | 2  |
| • Gaming Machine Permits (3 or more) | 17 |

### **Current Position**

9. The Licensing Service has undertaken an in-depth local area 'socio-economic' profile to take account of such risk and features which may affect the licensing objectives. This has resulted in the production of two documents:
  - The Gambling Local Area Profile – Spatial Analysis Report
  - Guidance on Undertaking Local Gambling Risk Assessments
10. The above documents can be seen at Appendix 2 and Appendix 3 respectively. The new Policy can be seen at Appendix 1.

### **Proposals**

11. The draft documents at Appendices 1, 2 and 3 form the basis of the paper that was forwarded to consultees. The consultation period ran for nearly seven weeks from Wednesday 21 February 2018 to Monday 9 April 2018. No representations were received during this time.
12. The following persons were consulted, representing the interests of persons carrying on businesses in the City of London:
  - All licensees.
13. The following persons were consulted, representing the interests of persons who may be affected by the City exercising its functions under the Act:
  - Local Members
  - Director of Community and Children's Services
  - GambleAware
  - Gamcare
  - Other responsible authorities
14. The remaining statutory consultee, The Commissioner of the City of London Police, was also consulted.
15. Following completion of the consultation no further amendments were considered appropriate.
16. The report and policy were approved by the Licensing Committee on 24 October 2018. Formal adoption is now required by Court of Common Council to comply with statutory requirements

### **Corporate & Strategic Implications**

17. The proposals within this report will help to meet one of the overriding aims contained within the service's business plan to meet legal requirements of relevant legislation. The proposals also support the Corporate Plan 2018 – 23 aims of contributing to a flourishing society and supporting a thriving economy.

**Implications**

18. There are no direct financial or risk implications for the Corporation's services associated with this report. Costs for the publication of the new policy can be met within current budget.

**Conclusion**

19. The Licensing Committee recommends that the Court of Common Council adopt the principles as the new Gambling Policy.

**Appendices**

- Appendix 1 – Statement of Licensing Principles 2018
- Appendix 2 - The Gambling Local Area Profile
- Appendix 3 - Guidance on Undertaking Local Gambling Risk Assessments

All of which we submit to the judgement of this Honourable Court.

DATED this 24<sup>th</sup> day of October 2018.

SIGNED on behalf of the Committee.

**Peter Gerard Dunphy**  
Chairman, Licensing Committee



CITY OF LONDON CORPORATION

GAMBLING ACT 2005

STATEMENT OF LICENSING  
PRINCIPLES

January 2018

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## **PART A**

### **GENERAL**

#### **1. Introduction**

- 1.1 The City of London Corporation provides local government services for the financial and commercial heart of Britain, the “Square Mile”. It is committed to maintaining and enhancing the status of the business City as the world’s leading international financial and business centre through the policies it pursues and the high standard of services it provides. Its responsibilities extend far beyond the City boundaries in that it also provides a host of additional facilities for the benefit of the nation. These include open spaces such as Epping Forest and Hampstead Heath and the Barbican Arts Centre.
- 1.2 The City of London combines its ancient traditions and ceremonial functions with the role of a modern and efficient local authority, looking after the needs of its residents, businesses and over 350,000 people who come to work in the “Square Mile” every day. Among local authorities the City of London is unique; not only is it the oldest in the country but it operates on a non-party political basis through the Lord Mayor, Aldermen and Members of the Court of Common Council. The Lord Mayor, in particular, has an important role as the principal ambassador of the City of London Corporation and the Business City, supporting and promoting the City generally and particularly as the world's leading international financial and business centre both at home and abroad; consulting widely within the City community on business needs.
- 1.3 Licensing authorities are required by the Gambling Act 2005 (‘the Act’) to publish a statement of the principles (‘Policy’) which they propose to apply when exercising their functions under the Act. This statement must be published at least every three years. The statement must also be reviewed from and any amended parts re-consulted upon. The statement must then be re-published.
- 1.4 The City of London Corporation consulted widely upon this statement before finalising and publishing it. A list of those persons consulted is provided below:
  - Chief Officer of Police
  - Ladbrokes
  - William Hill

- Coral
- Paddy Power
- Betfred
- Gamcare
- GambleAware
- Director of Community and Children's Services
- Local Members
- In addition the Statement was placed on the City Corporation web site for comment

The Gambling Act requires that the following parties are consulted by licensing authorities:

- Chief Officer of Police;
- One or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area;
- One or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Gambling Act 2005.

- 1.5 Our consultation took place from 21 February 2018 to 09 April 2018.
- 1.6 The policy was approved at a meeting of the Court of Common Council on 17 May 2018 and is published via our website. Hard copies are available on request.
- 1.7 Should you have any comments as regards this policy statement please send them via e-mail or letter to the contact details at the end of this document.
- 1.8 It should be noted that this policy statement will not override the right of any person able to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Gambling Act 2005.

## **2. The Licensing Objectives**

- 2.1 In exercising most of their functions under the Gambling Act 2005, licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives are:



- 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
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

1.9 It should be noted that the Gambling Commission has stated:

‘The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling.’

1.10 The City of London Corporation is aware that, as per Section 153, in making decisions about premises licences and [provisional statements] it should aim to permit the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant code of practice [under section 24 of the Act]
- in accordance with any relevant guidance issued by the Gambling Commission
- reasonably consistent with the licensing objectives and
- in accordance with the [licensing] authority’s Statement of Licensing Principles.

## **2. Declaration**

2.1 In producing this Policy statement, the City of London Corporation declares that it has had regard to the licensing objectives of the Gambling Act 2005, the guidance issued by the Gambling Commission, and any responses from those consulted on the statement. It shall be noted that this statement does now fully reflect the new guidance issued in September 2015 and the Gambling Commission’s ‘Licence conditions and codes of practice’ issued in February 2015.

2.2 In producing the final statement, the City of London Corporation gives appropriate weight to the views of those it has consulted. In determining what weight to give particular representations, the Corporation took into account the following factors:

- who is making the representations (what is their expertise or interest)
- relevance of the factors to the licensing objectives
- how many other people have expressed the same or similar views
- how far the representations relate to matters that the licensing authority should be including in its policy statement

### **3. Responsible Authorities**

3.1 The City of London Corporation is required by regulations to state the principles it will apply in exercising its powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The principles are:

- the need for the body to be responsible for an area covering the whole of the City of London Corporation's area; and
- the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group.

3.2 In accordance with the suggestion in the Gambling Commission's Guidance for local authorities, this authority designates the Director of Community and Children's Services for this purpose.

### **4. Interested Parties**

4.1 Interested parties can make representations about licence applications, or apply for a review of an existing licence. These parties are defined in the Gambling Act 2005 as follows:

‘For the purposes of this Part a person is an interested party in relation to an application for or in respect of a premises licence if, in the opinion of the City of London Corporation which issues the licence or to which the application is made, the person:

- lives sufficiently close to the premises to be likely to be affected by the authorised activities,
- has business interests that might be affected by the authorised activities, or
- represents persons who satisfy paragraph (a) or (b).’

4.2 The City of London Corporation is required by regulations to state the principles it will apply in exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party. The principles are:

- each case will be decided upon its merits
- this authority will not apply a rigid rule to its decision making

- it will consider the examples of considerations provided in Part 8 of the Gambling Commission's Guidance for Local Authorities.
- it will also consider the Gambling Commission's Guidance that 'has business interests' should be given the widest possible interpretation and include partnerships, charities, faith groups and medical practices

4.3 Interested parties can be persons who are democratically elected such as Aldermen, Common Councilmen and Members of Parliament. No specific evidence of being asked to represent an interested person will be required as long as the elected representative represents the ward likely to be affected. Other than these however, this authority will generally require written evidence that a person/body (e.g. an advocate / relative) 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation will be sufficient.

4.4 If individuals wish to approach Aldermen & Common Councilmen to ask them to represent their views then care should be taken that they are not part of the Licensing Committee dealing with the licence application. If there are any doubts then please contact the Licensing Section as detailed at the end of the document.

4.5 Where an application is made for a premises licence an interested party, as detailed in paragraph [5.3] of this document, or a responsible authority may make representations in writing to the City of London Corporation. Such representations must be made within such period as the Government set and must relate to the licensing objectives.

4.6 Where a licence is held an interested party or a responsible authority may apply for a review. Applications for review must be made in a manner and format which complies with The Gambling Act 2005 (Premises Licences) (Review) Regulations 2007.

## **5. Exchange of Information**

5.1 Licensing authorities are required to include in their statements the principles to be applied by the authority in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information between it and the Gambling Commission, and the functions under section 350 of the Act with respect to the exchange of information between it and the other persons listed in Schedule 6 to the Act.

5.2 The principle that the City Corporation applies is that it will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information which includes compliance with current Data Protection legislation. The City of London Corporation will also have regard to any Guidance issued by the Gambling Commission to local authorities on this matter when it is published, as well as any relevant Regulations issued by the Secretary of State under the powers provided in the Act.

5.3 Should any protocols be established as regards information exchange with other bodies then they will be made available.

## **6. Enforcement**

6.1 Licensing authorities are required by regulations made under the Act to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.

6.2 The City Corporation's principle is that it will be guided by the Gambling Commission's Guidance for local authorities and will endeavour to be:

- proportionate: regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised;
- accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- consistent: rules and standards must be joined up and implemented fairly;
- transparent: regulators should be open, and keep regulations simple and user friendly;
- targeted: regulation should be focused on the problem, and minimise side effects.

6.3 Following the Gambling Commission's Guidance for local authorities the City of London Corporation will endeavour to avoid duplication with other regulatory regimes as far as possible.

6.4 The City of London Corporation has adopted and implemented a risk-based inspection programme, based on;

- The licensing objectives
- Relevant codes of practice
- Guidance issued by the Gambling Commission, in particular Part 36
- The principles set out in this statement of licensing principles.

- 6.5 The main enforcement and compliance role for the City Corporation in terms of the Gambling Act 2005 will be to ensure compliance with the premises licences and other permissions which it authorises. The Gambling Commission will be the enforcement body for the operating and personal licences. It is also worth noting that concerns about manufacture, supply or repair of gaming machines will not be dealt with by the City Corporation but will be notified to the Gambling Commission.
- 6.6 The City Corporation will also keep itself informed of developments as regards the work of the Department of Business Innovation and Skills in its consideration of the regulatory functions of local authorities.
- 6.7 Bearing in mind the principle of transparency, the City Corporation's enforcement/compliance protocols/written agreements will be available upon request from the Licensing Section detailed at the end of this document.

## **7. Licensing Authority Functions**

- 7.1 Licensing authorities are required under the Act to:
- be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences
  - issue Provisional Statements
  - regulate members' clubs and miners' welfare institutes who wish to undertake certain gaming activities through issuing Club Gaming Permits and/or Club Machine Permits
  - issue Club Machine Permits to Commercial Clubs
  - grant permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres
  - receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
  - issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines
  - register small society lotteries below prescribed thresholds
  - issue Prize Gaming Permits
  - receive and Endorse Temporary Use Notices
  - receive Occasional Use Notices

- provide information to the Gambling Commission regarding details of licences issued (see section 6 above concerning Exchange of Information)
- maintain registers of the permits and licences that are issued under these functions

7.2 It should be noted that local licensing authorities will not be involved in licensing remote gambling at all. This will fall to the Gambling Commission via operating licences.

## **PART B**

### **PREMISES LICENCES**

#### **8. General Principles**

8.1 Premises licences will be subject to the requirements set out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions which will be detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

8.2 The City of London Corporation is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it considers such use to be:

- 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; and,
- in accordance with the authority's statement of licensing policy.

8.3 It is appreciated that as per the Gambling Commission's Guidance for local authorities 'moral objections to gambling are not a valid reason to reject applications for premises licences' (except as regards any 'no casino resolution' - see paragraph 12.1 below concerning Casinos) and also that unmet demand is not a consideration for a licensing authority.

8.4 'Premises' in the Act is defined as including 'any place'. Section 152 therefore prevents more than one premises licence applying to any place. But a single building could be subject to more than one premises licence, provided they are for different

parts of the building and the different parts of the building can be reasonably regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities should pay particular attention if there are issues about sub-divisions of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed.

- 8.5 The Gambling Commission states in the fifth edition of its Guidance to Licensing Authorities that: ‘In most cases the expectation is that a single building / plot will be the subject of an application for a licence, for example, 32 High Street. But, that does not mean 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances.’

‘The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing officer. However, the Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises.’

- 8.6 The City of London Corporation takes particular note of the Gambling Commission’s Guidance to Licensing Authorities which states that, ‘licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular they should be aware of the following:

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating.
- Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not “drift” into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit.

- Customers should be able to participate in the activity named on the premises licence.

8.7 The Guidance also gives a list of factors which the licensing authority should be aware of, which may include:

- Do the premises have a separate registration for business rates?
- Is the premises' neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?

8.8 The City of London Corporation will consider these and other relevant factors in making its decision, depending on all the circumstances of the case.

### **Premises 'ready for gambling'**

8.9 The Guidance states that a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

8.10 If the construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them, then an application for a provisional statement should be made instead.

8.11 In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, this authority will determine applications on their merits, applying a two stage consideration process:

- First, whether the premises ought to be permitted to be used for gambling
- Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

8.12 Applicants should note that this authority is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.



## **Multiple Premises**

- 8.13 The City Corporation recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are recognised and resolved at the earliest stage, operators are requested to give the authority a single named point of contact, who should be a senior individual, and whom the authority will normally contact first should any compliance queries or issues arise. The above is notwithstanding issues to be taken up under the Home Authority Principle.

## **Location**

- 8.14 The City of London Corporation is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can. As per the Gambling Commission's Guidance, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. Should any specific policy be decided upon as regards areas where gambling premises should not be located, this statement will be updated. It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome.

## **Planning**

- 8.15 The Gambling Commission Guidance to Licensing Authorities states:  
In determining applications, the licensing authority should not take into consideration matters that are not related to gambling and the licensing objectives. One example would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal.
- 8.16 This authority will not take into account irrelevant matters as per the above guidance. In addition, this authority notes the following excerpt from the Guidance:  
‘When dealing with a premises licence application for finished buildings, the licensing authority should not take into account whether those buildings have to comply with the necessary planning or building consents. Nor should fire or health and safety risks be taken into account. Those matters should be dealt with under relevant planning control, building and other regulations, and must not form part of the consideration for the premises licence. S.210 of the Act prevents licensing authorities taking into account the likelihood of the proposal by the applicant obtaining planning or building consent when considering a premises licence application. Equally, the grant of a

gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.’

- 8.17 Duplication with other regulatory regimes - The City of London Corporation will seek to avoid any duplication with other statutory/regulatory systems where possible, including planning. This authority will not consider whether a licence application is likely to be awarded planning permission or building regulations approval, in its consideration of it. It will though, listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise.
- 8.18 When dealing with a premises licence application for finished buildings, this authority will not take into account whether those buildings have to comply with the necessary planning or buildings consents. Fire or health and safety risks will not be taken into account, as these matters are dealt with under relevant planning control, buildings and other regulations and must not form part of the consideration for the premises licence.

### **Licensing objectives**

- 8.19 Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, the City Corporation has considered the Gambling Commission’s Guidance to local authorities and some comments are made below.
- 8.20 Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime - The City of London Corporation is aware that the Gambling Commission will be taking a leading role in preventing gambling from being a source of crime. The Gambling Commission's Guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, where an area has known high levels of organised crime this authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors. The City of London Corporation is aware of the distinction between disorder and nuisance and will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, so as to make that distinction. Issues of nuisance cannot be addressed via the Gambling Act provisions.
- 8.21 Ensuring that gambling is conducted in a fair and open way - The City Corporation has noted that the Gambling Commission has stated that it would generally not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences.

- 8.22 Protecting children and other vulnerable persons from being harmed or exploited by gambling - The City Corporation has noted that the Gambling Commission's Guidance states that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at, or are particularly attractive to, children). The City Corporation will, therefore, consider, as suggested in the Gambling Commission's Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances / machines, segregation of areas etc.
- 8.23 The City Corporation will also make itself aware of the Codes of Practice which the Gambling Commission issues as regards this licensing objective, in relation to specific premises such as casinos.
- 8.24 As regards the term 'vulnerable persons' it is noted that the Gambling Commission is not seeking to offer a definition but states that 'it will, 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 a mental impairment, alcohol or drugs.' The City of London Corporation will consider this licensing objective on a case by case basis.

### **Conditions**

- 8.25 Any conditions attached to licences will be proportionate and will be:
- relevant to the need to make the proposed building suitable as a gambling facility;
  - directly related to the premises and the type of licence applied for;
  - fairly and reasonably related to the scale and type of premises;
  - reasonable in all other respects.
- 8.26 Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures the City Corporation will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas etc. There are specific comments made in this regard under some of the licence types below. The City Corporation will also expect the licence applicant to offer his/her own suggestions as to the way in which the licensing objectives can be met effectively.
- 8.27 The City Corporation will also consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include

the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Gambling Commission's Guidance. The Secretary of State has prescribed the categories of gaming Machine and current details of the stakes and prizes of each category are available on the City of London's website in the licensing section.

8.28 This authority will also ensure that where category C or above machines are on offer in premises to which children are admitted:

- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- only adults are admitted to the area where these machines are located;
- access to the area where the machines are located is supervised;
- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and
- at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18 years of age.

These considerations will apply to premises including buildings where multiple premises licences are applicable.

8.29 As per the Gambling Commission's Guidance, the City Corporation will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

8.30 It is noted that there are conditions which the licensing authority cannot attach to premises licences as follows:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated);
- conditions in relation to stakes, fees, winnings or prizes.

## **Door Supervisors**

- 8.31 Door Supervisors – The Gambling Commission advises in its Guidance to Licensing Authorities that if a licensing authority is concerned that a premises may attract disorder or be subject to attempts at unauthorised access (for example by children and young persons) then it may require that the entrances to the premises are controlled by a door supervisor, and is entitled to impose a premises licence to this effect.
- 8.32 Where it is decided that supervision of entrances/machines is appropriate for particular cases, door supervisors are expected to be SIA licensed.

## **9. Adult Gaming Centres**

- 9.1 The City Corporation will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that people under 18 years of age do not have access to the premises.
- 9.2 The City of London Corporation will expect applicants to offer their own measures to meet the licensing objectives. Appropriate measures / licence conditions may cover issues such as:
- proof of age schemes
  - CCTV
  - supervision of entrances / machine areas
  - physical separation of areas
  - location of entry
  - notices / signage
  - specific opening hours
  - self-barring schemes
  - provision of information leaflets / helpline numbers for organisations such as GamCare.
- 9.3 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

## **10. Licensed Family Entertainment Centres**

- 10.1 The City Corporation will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority, for example, that there will be sufficient measures to ensure that people under 18 years of age do not have access to the adult only gaming machine areas.
- 10.2 The City of London Corporation will expect applicants to offer their own measures to meet the licensing objectives however appropriate measures / licence conditions may cover issues such as:
- proof of age schemes
  - CCTV
  - supervision of entrances / machine areas
  - physical separation of areas
  - location of entry
  - notices / signage
  - specific opening hours
  - self-barring schemes
  - provision of information leaflets / helpline numbers for organisations such as GamCare.
  - measures / training for staff on how to deal with suspected truant school children on the premises

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

- 10.3 The City Corporation will, as per the Gambling Commission's guidance, refer to the Commission's website to see any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated. The City of London Corporation will also make itself aware of any mandatory or default conditions on these premises licences, when they have been published.

## **12. Casinos**

- 12.1 No Casinos resolution – The City Corporation has not passed a 'no casino' resolution under Section 166 of the Gambling Act 2005, but is aware that it has the power to do so. Should the City of London Corporation decide in the future to pass such a resolution, it will update this policy statement with details of that resolution. Any such decision will be made by the Court of Common Council.

### **13. Bingo Premises**

#### **13.1 The City corporation notes that the Gambling Commission's Guidance states:**

Licensing authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bingo premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises.

#### **13.2 The Guidance further states:-**

Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5(3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.

### **14. Betting Premises**

#### **14.1 Betting machines – The City Corporation will, as per the Gambling Commission's Guidance, take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines by children and young persons or by vulnerable people (it is an offence for those under 18 years of age to bet), when considering the nature and circumstances of betting machines an operator wants to offer.**

#### **14.2 While the City Corporation has discretion as to the number, nature and circumstances of use of betting machines, there is no evidence that such machines give rise to regulatory concerns. This authority will normally consider limiting the number of machines only where there is clear evidence that such machines have been or are likely to be used in breach of the licensing objectives. Where there is such evidence, this authority may consider, when reviewing the licence, the ability of staff to monitor the use of such machines from the counter.**

## **15. Travelling Fairs**

- 15.1 It will fall to the City Corporation to decide, where category D machines and / or equal chance prize gaming without a permit is made available for use at travelling fairs, if the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.
- 15.2 The licensing authority will also consider whether the applicant falls within the statutory definition of a travelling fair.
- 15.3 It has been noted that the 27 days statutory maximum for the land being used as a fair is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The City of London Corporation will work with its neighbouring authorities to ensure that land which crosses our boundaries is monitored so that the statutory limits are not exceeded.

## **16. Provisional Statements**

- 16.1 Developers may wish to apply to this authority for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.
- 16.2 S204 of the Gambling Act provides for a person to make an application to the licensing authority for a provisional statement in respect of premises that he or she:
- expects to be constructed;
  - expects to be altered; or
  - expects to acquire a right to occupy.
- 16.3 The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible authorities and interested parties may make representations and there are rights of appeal.
- 16.4 In contrast to the premises licence application, the applicant does not have to hold or have applied for an operating licence from the Gambling Commission (except in the



case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made.

16.5 The holder of a provisional statement may then apply for a premises licence once the premises are constructed, altered or acquired. The licensing authority will be constrained in the matters it can consider when determining the premises licence application, and in terms of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:

- they concern matters which could not have been addressed at the provisional statement stage, or
- they reflect a change in the applicant's circumstances.

16.6 In addition, the authority may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- which could not have been raised by objectors at the provisional statement stage;
- which in the authority's opinion reflect a change in the operators' circumstances;
- where the premises has not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and this licensing authority notes that it can discuss any concerns it has with the applicant before making a decision.

## **17. Reviews:**

17.1 Requests for a review of a premises licence can be made by interested parties or responsible authorities. However, it is for the licensing authority to decide whether the review is to be carried-out. This will be on the basis of whether the request for the review is relevant to the matters listed below:

- 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 authority's statement of licensing principles.

Consideration will also be given as to whether the request for a review is frivolous, vexatious or substantially the same previous representations or requests for review.

17.2 The licensing authority can also initiate a review of a licence on the basis of any reason which it thinks is appropriate.

Once a valid application for a review has been received, representations can be made by responsible authorities and interested parties during a 28 day period. This period begins 7 days after the application was received by the licensing authority, who will publish notice of the application within 7 days of receipt.

The licensing authority must carry out the review as soon as possible after the 28 day period for making representations has passed.

17.3 The purpose of the review will be to determine whether the licensing authority should take any action in relation to the licence. If action is justified, the options open to the licensing authority are:

- add, remove or amend a licence condition imposed by the licensing authority;
- exclude a default condition imposed by the Secretary of State or Scottish Ministers (e.g. opening hours) or remove or amend such an exclusion;
- suspend the premises licence for a period not exceeding three months;
- revoke the premises licence.

17.4 In determining what action, if any, should be taken following a review, the licensing authority must have regard to the principles set out in section 153 of the Act, as well as any relevant representations

17.5 In particular, the licensing authority may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.

17.6 Once the review has been completed, the licensing authority must, as soon as possible, notify its decision to:

- the licence holder
- the applicant for review (if any)
- the Commission
- any person who made representations
- the chief officer of police or chief constable; and
- Her Majesty's Commissioners for Revenue and Customs

## PART C

### PERMITS / TEMPORARY & OCCASIONAL USE NOTICE

#### **18 Unlicensed Family Entertainment Centre (UFEC): Gaming Machine Permits (Statement of Principles on Permits - Schedule 10, Paragraph 7)**

18.1 Where a premises does not hold a premises licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit. It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (Section 238).

18.2 The Gambling Act 2005 states that a licensing authority may prepare a statement of principles that they propose to consider in determining the suitability of an applicant for a permit. In preparing this statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission under section 24.

18.3 The Gambling Commission's Guidance for local authorities also states:

‘In its statement of policy, a licensing authority may include a statement of principles that it proposes to apply when exercising its functions in considering applications for permits. In particular it may want to set out the matters that it will take into account in determining the suitability of the applicant. Given that the premises is likely to appeal particularly to children and young persons, licensing authorities may wish to give weight to matters relating to protection of children from being harmed or exploited by gambling and to ensure that staff supervision adequately reflects the level of risk to this group’

18.4 The Guidance further states:

‘An application for a permit may be granted only if the licensing authority is satisfied that the premises will be used as an UFEC, and if the chief officer of police has been consulted on the application.....’ The licensing authority may also consider asking applicants to demonstrate:

- a full understanding of the maximum stakes and prizes of the gambling that is permissible in UFECs
- that the applicant has no relevant convictions (as set out in Schedule 7 of the Act)
- that employees are trained to have a full understanding of the maximum stakes and prizes.

18.5 It should be noted that a licensing authority cannot attach conditions to this type of permit.

18.6 Statement of Principles - The City Corporation will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits. However, they may include appropriate measures / training for staff as regards suspected truant school children on the premises, measures / training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on / around the premises.

**19 Alcohol Licensed Premises: Gaming Machine Permits - Schedule 13, Paragraph 4(1)**

19.1 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have two gaming machines, of categories C and/or D. The premises merely need to notify the licensing authority. The licensing authority can remove the automatic authorisation in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (i.e. that written notice has been provided to the licensing authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with);
- the premises are mainly used for gaming; or
- an offence under the Gambling Act has been committed on the premises.

19.2 If a premises wishes to have more than two machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and ‘such matters as they think relevant.’ The City Corporation considers that ‘such matters’ will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that people under 18 years of age do not have access to the adult only gaming machines.

- 19.3 Measures which will satisfy the authority that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also be of help. As regards the protection of vulnerable persons applicants may wish to consider the provision of information leaflets / helpline numbers for organisations such as GamCare.
- 19.4 It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with as an Adult Gaming Centre premises licence.
- 19.5 It should be noted that the licensing authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.
- 19.6 It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

## **20 Prize Gaming Permits: Statement of Principles on Permits - Schedule 14, Paragraph 8 (3)**

- 20.1 The Gambling Act 2005 states that a licensing authority may „prepare a statement of principles that they propose to apply in exercising their functions under this Schedule“ which „may, in particular, specify matters that the licensing authority propose to consider in determining the suitability of the applicant for a permit“.
- 20.2 The City of London Corporation has prepared a Statement of Principles which is that the applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:
- that they understand the limits to stakes and prizes that are set out in Regulations;
  - and that the gaming offered is within the law.
- 20.3 In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.

20.4 It should be noted that there are conditions in the Gambling Act 2005 with which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:

- the limits on participation fees, as set out in regulations, must be complied with;
- all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize);
- participation in the gaming must not entitle the player to take part in any other gambling.

## **21 Club Gaming and Club Machines Permits**

21.1 Members Clubs and Miners' welfare institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Clubs Gaming machines permit. The Club Gaming Permit will enable the premises to provide gaming machines (three machines of categories B, C or D), equal chance gaming and games of chance as set-out in forthcoming regulations. A Club Gaming machine permit will enable the premises to provide gaming machines (three machines of categories B, C or D).

21.2 The Act states:

‘...members clubs must have at least 25 members and be established and conducted wholly or mainly for purposes other than gaming, unless the gaming is restricted to that of a prescribed kind (currently bridge and whist). Members' clubs must be permanent in nature but there is no need for a club to have an alcohol licence.’

21.3. The Commission Guidance also notes that ‘licensing authorities may only refuse an application on the grounds that:

- the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
- the applicant's premises are used wholly or mainly by children and/or young persons;
- an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;

- a permit held by the applicant has been cancelled in the previous ten years; or an objection has been lodged by the Commission or the Police.”

21.4. There is also a ‘fast-track’ procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). As the Gambling Commission’s Guidance for local authorities states, ‘Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the ground upon which an authority can refuse a permit are reduced.’ and the grounds on which an application under the process may be refused are:

- that the club is established primarily for gaming, other than gaming prescribed under Schedule 12;
- that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
- that a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled.

21.5. There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

## **22. Temporary Use Notices**

22.1. There are a number of statutory limits as regards temporary use notices. Gambling Commission Guidance is noted that the meaning of premises in part eight of the Act is discussed in Part 7 of the guidance. As with premises, the definition of a ‘set of premises’ will be a question of fact in the particular circumstances of each notice that is given. In the Act premises is defined as including ‘any place’. In considering whether a place falls within the definition of a ‘set of premises’, the City Corporation will need to look at, amongst other things, the ownership/occupation and control of the premises. The Guidance states, ‘This is a new permission and licensing authorities should be ready to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises.’

## **23. Occasional Use Notices:**

23.1. The licensing authority has very little discretion as regards these notices aside from ensuring that the statutory limit of eight days in a calendar year is not exceeded. The City Corporation will however consider the definition of a ‘track’ and whether the applicant is permitted to avail him/herself of the notice.

## **PART D**

### **Local Risk Assessments/Local Area Profile**

#### **24. Local Risk Assessments**

- 24.1. The Gambling Commission's Social Responsibility Code 10.1.1 requires all premises licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in this Policy.
- 24.2. Licensees are required to undertake a local risk assessment when applying for a new premises licence. Their risk assessment must also be updated:
- when applying for a variation of a premises licence
  - to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of policy
  - when there are significant changes at a licensee's premises that may affect their mitigation of local risks
- 24.3. The new Social Responsibility provision is supplemented by an ordinary code provision that requires licensees to share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise at the request of the licensing authority, such as when they are inspecting a premises.
- 24.4. More information on Local Risk Assessments can be found in The City of London's guide on risk assessments.<sup>1</sup>

#### **25. Local Area Profile**

- 25.1. In order to assist licensees in formulating their local risk assessments the City of London has produced a Local Area Profile.<sup>2</sup> The aim of the Local Area Profile is to increase awareness of local risks that licensees will need to address in their risk assessments.
- 25.2. The City Corporation will expect local risk assessments to contain control measures that seek to mitigate those risks identified.

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<sup>1</sup> Guidance on Undertaking Gambling Risk Assessments – January 2018

<sup>2</sup> Gambling Local Area Profile – April 2017





# **Gambling Local Area Profile**

## **Spatial Analysis Report**

Exploring area-based vulnerability to gambling related-harm:  
Developing the gambling-related harm risk index

April 2017

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# Executive Summary

## Background

In Great Britain, there is a changing gambling policy and regulatory environment which has increased focus on risk. Local area risk assessments have been introduced into the Gambling Commission's updated Licensing Conditions and Codes of Practice with understanding local risk, and taking appropriate steps to mitigate risk, being highlighted as a key concern.

Policy is also becoming more focused on understanding and mitigating gambling-related harm more broadly, rather than focusing on problem gambling alone.

Finally, in the Gambling Act 2005, children and vulnerable people were singled out for special regulatory attention. However, to date, about who may be vulnerable or why and how vulnerability and harm may vary at a local level has not previously been explored and has been subject to very little investigation.

## Aims of the Analysis

The analysis aimed to explore and document what different types of harms arise from gambling, and who may be at greater risk of harm, explore and document who are the City of London's most vulnerable groups, and provide the basis for an informed and astute led approach in decision making.

## Methods

To develop the theoretical basis of our risk models, we first had to ascertain which types of people were viewed as vulnerable to, or at risk of, gambling-related harm. This necessitated the development of the City of London's stakeholder consultation survey.

The survey questionnaire was based on the format generated by GeoFutures<sup>1</sup> on behalf of the City of Westminster and Manchester City Council, but modified for our purposes.

Furthermore, individual consultation interviews were arranged with a diverse range of key stakeholders within the City of London who were identified and approached purposely from those who had experienced the effects of gambling-related harm first hand.

## Results

The City of London's very unique demography resonated with our stakeholders who confirmed the long-standing knowledge that those working in jobs that involve high-level financial risk (executives, traders and financial advisors) are at a greater risk to gambling-related harm.

The introduction of smart phone technology and the installation of gambling applications has engaged a higher volume of users. It's anonymous, hence being regarded as a hidden addiction. Those who are gambling on-line are specifically professional males aged between 18-35<sup>2</sup> years old who are in uncontrolled environments where warnings and control is limited, and often during working hours.

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<sup>1</sup> Geofutures Ltd, Bath

<sup>2</sup> EPIC Risk Management

Children now regularly see gambling advertising and the number of gambling commercials on British TV has increased exponentially since the deregulation of the sector nearly 10 years ago, and since the Gambling Act 2005 came into force in September 2007.

Consequences of this are two-fold:

- The harm it causes to the gambler themselves, their employer, their colleagues, family, extended family, friends, and the community.
- The cost it causes to the UK Government in health care, welfare, housing and to the criminal justice system.

The City of London's transient workforce, those working on the plethora of construction sites around the city are not immune to gambling-related harm. We have no direct evidence to support this however, it would be remiss not to at least remark on this situation.

### Implications

When reflecting on who may be vulnerable to gambling-related harm, a holistic approach needs to be taken as personal circumstances of each individual are not known. Therefore, for the groups outlined in this analysis, it does not mean that everyone with those characteristics **will** experience harm rather that based on these characteristics there is an increased risk that they **may** experience harm.

There are likely to be multiple and complex risk factors for harm, with some people having multiple characteristics of potential vulnerability.

### Limitations

This analysis is constrained by actual evidence. Therefore, some risk factors, groups or themes may have been overlooked (such as minority ethnic groups) where we had very limited available data and therefore have not so far included them to date.

The specific aim was to merely assemble an authentic 'Local Area Profile' which underpins the basis for an informed and astute led approach in decision making for the City of London Licensing Authority.

## **1. Introduction**

### **1.1 Overview**

National gambling policy and regulatory authorities have an increasing focus on risk, and to date, there has been very little examination of who is vulnerable to gambling-related harm, how these people can be identified and what might be done to protect them.

This report has been formed from a specific undertaking to explore area-based vulnerability to gambling-related harm within the City of London. It is now compulsory for all industry operators to undertake local area risk assessments to investigate the risks gambling venues pose to the licensing objectives.

The focus on vulnerable persons and harm comes directly from the licensing objectives set out in the Gambling Act 2005, which states that children and vulnerable people should be protected from being harmed or exploited by gambling.

New code provisions covering risk assessments and local authority profiles came into effect from April 2016.

## 2. Background

The Gambling Act 2005 gives Licensing Authorities responsibility for issuing premises licences for gambling venues. The advice contained within the Act is that Licensing Authorities should 'aim to permit' premises licences as long as applications are reasonably consistent with the following objectives:

- a) Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime;
- b) Ensuring that gambling is conducted in a fair and open way, and;
- c) Protecting children and other vulnerable persons from being harmed or exploited by gambling.

More recently, there have been some changes in the recommended approach to gambling licensing and regulation, as outlined in various documents published by the Gambling Commission.<sup>3,4</sup>

These changes can be summarised into three broad areas:

- Increased focus on risk and regulation;
- Greater attention to local area risk, and;
- Encouragement of partnership and collaboration between stakeholders to mitigate risk.

### Aims of the Analysis

2.1 As a reference guide, the examination process accomplished by the City of Westminster and Manchester City Council, in particular '*Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index*' and '*Exploring area based vulnerability to harm: who is vulnerable?*' was also explored by the City of London and established three main aims;

1. Explore and document what different types of harms arise from gambling, and who may be at greater risk of harm;
2. Explore and document who are the City of London's most vulnerable groups;
3. Provide the basis for an informed and astute led approach in decision making.

### Approach

2.2 Spatial analysis has been used to examine local variation in vulnerability to gambling related-harm in the City of London. In order to do this we have;

- Identified the main characteristics associated with gambling-related harm referencing the process completed by the City of Westminster and Manchester City Council.
- For each characteristic, the availability of local level data was considered, and further datasets were assessed against within the local context.
- Encapsulated this information into a single model visually that outlines areas of greater or lower potential risks.

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<sup>3</sup> Gambling Commission Licence Conditions Codes and Practice – January 2018

<sup>4</sup> Gambling Commission Guidance to Licensing Authorities 5th Edition – September 2016

### **3. City of London**

#### **3.1 Overview**

The City of London is also known as the 'Square Mile', and is the financial district and historic centre of London. It is one of 33 areas with local authority responsibilities into which London is divided. Administratively, London is divided into 32 boroughs and the City of London.

The City Corporation has a special role and wide remit that goes beyond that of an ordinary local authority with three main aims:

- to support and promote London as the world's leading international financial and business centre and attract new business to the capital and the whole UK
- to work in partnership with local communities to increase skills, employment and opportunities for all Londoners, including through the City Bridge Trust
- to enhance the capital as a hub of culture, history and green spaces for Londoners – residents, workers, and visitors.

The residential population of the City of London is approximately 12,000 people. The daytime population of the City increases significantly, with approximately 400,000 people commuting into the City each day for work. Additionally, a transient labour-force increases the number of commuters to the city working on the many building/construction sites.

In addition to the above over 18 million tourists visit London every year, many to see the popular attractions in the City of London which include St Paul's Cathedral, the Monument to the Great Fire of London, Guildhall Galleries, the Barbican Centre and the Museum of London.

Notable buildings in the area include 30 St Mary Axe (Gherkin), the Leadenhall Building (Cheesegrater) at 122 Leadenhall Street, 20 Fenchurch Street (Walkie-Talkie), the Broadgate Tower and the Heron Tower.

The city is also full of upscale eateries, celebrity chef restaurants and markets including the historic Leadenhall Market and Petticoat Lane.



## **4. Developing the risk index models: theoretical basis**

### **4.1 Overview**

The Licensing team at the City of London conducted research to establish the theoretical and first-hand basis for our risk-index models. Our stakeholder consultation consisted of a two-phase approach:

1. Stakeholder consultation survey
2. Stakeholder face to face interviews

### **4.2 Methods**

#### **4.2.1 Stakeholder Consultation Survey**

To develop the theoretical basis of our risk models, we first had to ascertain which types of people were viewed as vulnerable to, or at risk of, gambling-related harm, and this necessitated the development of the City of London's stakeholder consultation survey.

The survey questionnaire was based on the format generated by GeoFutures on behalf of the City of Westminster and Manchester City Council, but modified for our purposes. (See Appendix 1)

#### **4.2.2 Stakeholder Consultation face to face Interviews**

Furthermore, face to face consultation interviews were arranged with a diverse range of key stakeholders within the City of London who were identified and approached purposely from those who had experienced the effects of gambling-related harm first hand.

### **4.3 Definitions**

Before considering the evidence relating to who is vulnerable to, or at risk of, gambling-related harm, the following definitions apply.

#### **4.3.1 Gambling-related harm**

Gambling-related harm can be defined as:

'The adverse financial, personal and social consequences to players, their families, and wider social networks that can be caused by uncontrolled gambling.'<sup>5</sup>

#### **4.3.2 Problem gambling**

Problem gambling (or ludomania, but usually referred to as 'gambling addiction' or 'compulsive gambling') is defined as:

'an urge to gamble continuously despite harmful negative consequences or a desire to stop'.<sup>6</sup>

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<sup>5</sup> Responsible Gambling Strategy Board - 2009

<sup>6</sup> Helpstopgambling.org

#### **4.3.3 Nature of harms**

The following represents the nature of harms to individuals which can be broadly grouped as follows:

- Detriments to the person's health, both morbidity and mortality
- Emotional or psychological distress
- Financial difficulties, diverted financial resources, bankruptcy or reduction of financial situation
- Reduced performance / loss of role at employment or study
- Relationship conflict or breakdown.
- Criminal activity. While a rare outcome of gambling problems, entering the judicial system creates acute harm to individuals as well as the community. This includes (but is not limited to) incarceration, along with psychological harms of shame and stigma.
- Harm to family and friends (in terms of the partner (or spouse) and the children of people with gambling problems)
- Harm to the community (self-reported missed work, levels of debt, proceeds from crime, and costs to the judicial system and welfare system).
- Indirect harm to the community (poverty, poor health, lower levels of social and human capital)
- Financial loss to the community (loss of money from the community or the transporting of harm – on-line gambling)

#### **4.3.4 Who can be vulnerable to gambling-related harm?**

The Gambling Commission has stated that whilst they did not want to explicitly define who vulnerable people are, this is likely to include people who gamble more than they want to.<sup>7</sup>

The following represents those persons who can be vulnerable to gambling-related harm:

- Young people (youth)
- Students
- Those with Mental Health problems
- Those afflicted with substance use/misuse issues
- Those with learning disabilities / difficulties
- Immigrants
- Ethnic minorities
- Homeless people
- Those living in constrained economic circumstances
- Those living in deprived areas
- Prisoners
- Older people
- Those with personality / cognitive impairments
- Women potentially vulnerable to harm
- Other groups/people

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<sup>7</sup> Gambling Commission 2012

## 4.4 Gambling-Related Harm

Extracted from our stakeholder questionnaire survey the following is a generic representation.

### 4.4.1 Stakeholder perspective: What different types of harms arise from gambling?

As with the list overleaf outlining the nature of harms to individuals our stakeholders echoed the same views; however, the fundamental element delineated is the ancillary harm impacting families and communities in particular:

- Crime (funding a gambling addiction)
- Child abuse
- Domestic violence
- Deterioration of family relationships, marriage breakdown
- Employability (loss of job/career issues)
- Family personal safety (debt with lenders)
- Financial stress
- Health issues (nutrition and general wellbeing including lack of sleep)
- Homelessness (rent is not paid or is in arrears), and dependents including children being made homeless
- Reputation and brand loss to an organisation including legal implications
- Social isolation.

### 4.4.2 Stakeholder perspective: Who do these harms affect?

Mostly our stakeholders established that the individual/person who is significantly affected is the gambler themselves, followed by their family (especially children), extended family and friends, employers/colleagues, broader social network, and the community.

The detriment to the individual gambler extends to anti-social behaviour, including compulsive lying, bullying, and the extreme where the individual has self-harmed or tragically committed suicide.

### 4.4.3 Stakeholder perspective: How might harms vary from person to person?

The consensus portrayed by our stakeholders characterised that harm varies from person to person dependent on personal circumstances, and they range from:

- The type of gambling
- The support offered by family
- The severity of the addiction
- The culture and acceptance of gambling
- The gamblers emotional wellbeing (depression or low self-esteem)
- The gamblers mental health (unable to make informed or balanced decisions)
- The gamblers individual character (tendency towards anxiety or stress)
- The gamblers income (high income earner or receiving benefits)

#### **4.4.4 Stakeholder perspective: Over what time frame might harm be experienced?**

Individuals can become pathological instantaneously, or within a few weeks or even years. Some individuals can take over a decade or even a lifetime.

Regrettably gambling is a hidden addiction and therefore often goes unnoticed. However the time frame that gambling-related harm is experienced is wide-ranging and this can also be attributed to the personality of the gambler, and whether or not it is an entrenched behaviour.

### **4.5 Vulnerable people**

Extracted from our stakeholder questionnaire survey the following is a generic representation.

#### **4.5.1 Stakeholder perspective: Identifying vulnerability**

Vulnerability has many components, and can be identified with many causes contributing to being categorised as being vulnerable.

Predominantly our stakeholders implied the following risk factors which can all be identified through assessment, behaviour and observation:

- Those individuals who have an addictive personality.
- Those with lower levels of education.
- Those from deprived or poorer communities.
- Those with fewer psychological coping resources or those being manipulated or controlled either physically, mentally or emotionally.
- Those who have difficulties in coping with daily living, and the absence of an adequate support structure around them.
- Those who need support or protection because of age, learning difficulties, mental health, mobility issues, or with a disability.
- Those with an alcohol or substance abuse dependency.

#### **4.5.2 Stakeholder perspective: Who is vulnerable to gambling-related harm?**

Largely 'everyone' is vulnerable to gambling-related harm, particularly anyone who is related to the gambler (spouses, partners, extended family and friends).

#### **4.5.3 Stakeholder perspective: Which groups are most vulnerable to gambling-related harm?**

The clear majority of our stakeholders specified that the group most vulnerable to gambling-harm were young people/children trailed by the gambler themselves which appears to be more men than women. Furthermore, their partner/spouse, immediate family, and friends.

## 5. Developing the risk index models: modelling and spatial analysis

### 5.1 Introduction

The datasets, data sources and statistics used to collate the City of London spatial analysis are representative of the best and most recent local data available to signify the risk factors identified, some of which have multiple datasets.

### 5.2 Characteristics of vulnerability

The following characteristics considered for inclusion in the City of London model were those with supplementary evidence to support each one at this time, however the models will be regularly reviewed and amended to take into account varying factors.

**Risk factor:** problem gamblers seeking treatment

**Dataset used:** *GamCare counselling locations and Gamblers Anonymous Meetings*

These locations are derived from the lists sourced from GamCare and Gamblers Anonymous website. These locations indicate the places where people with gambling problems will be visiting and hence bring those potentially vulnerable groups to these locations.

**Risk factor:** crime, individuals gambling illegally in the streets

**Dataset used:** *City of London Police Crime Statistics*

This dataset is capturing information about individuals who have been caught gambling illegally in the streets.

**Risk factor:** crime, including theft/robbery, and stealing from employers

**Dataset used:** *City of London Police Crime Statistics*

This dataset is capturing information about individuals who have either been caught stealing, and employees committing theft from Gambling Licensed Premises, and theft from Automatic Teller Machines (ATM's) located within Gambling Licensed Premises.

**Risk factor:** crime, including criminal damage

**Dataset used:** *City of London Police Crime Statistics*

This dataset is capturing information about individuals who have committed a crime relating to criminal damage.

**Risk factor:** crime, involving employee fraud

**Dataset used:** EPIC Risk Management

This data represents those working in the financial sector who have access to company money (expense accounts, credit cards and client money).

**Risk factor:** individuals using hand-held devices during work hours

**Dataset used:** EPIC Risk Management

This data is used to represent that it is a known fact that gambling is now 24/7, anonymous, and engages a higher volume of users, specifically professional males aged between 18-35<sup>8</sup> and working in the financial sector who are in uncontrolled environments.

**Risk factor:** those with financial difficulties and or debt

**Dataset used:** location of payday loan shops, loan sharks, and pawn brokers

This dataset represents locations where those with financial difficulties and debt problems are more likely to be present, accessing credit through less secured means.

Location of food banks and soup kitchens

This dataset aims to model financial difficulties and debt problems, through places where people are so severely impoverished that they cannot afford to buy food.

**Risk factor:** homelessness

**Dataset used:** The location of homeless accommodation and City of London supported housing

There are limited accommodation provision types for the homeless within the City of London with the majority of hostels being outside the 'Square Mile'.

**Risk factor:** people with poor mental health

**Dataset used:** Mental health services and mental health care facilities

Capturing accurate information about people with poor mental health is difficult and we acknowledge limitations with this, however we believe that there is sufficient, albeit a conservative measure of poor mental health within the City of London.

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<sup>8</sup> EPIC Risk Management

**Risk factor:** people with substance abuse or misuse problems

**Dataset used:** Drug and alcohol treatment and recovery centre clinics and clinics within GP surgeries and needle exchanges

As with problem gambling treatment locations, these clinics are likely to attract potentially vulnerable people to these locations. This data set is an amalgamation of an internal list supplemented by web searches.

**Risk factor:** youth

**Dataset used:** number of residents aged 10-24 years

The age range of 10-24 has been selected based on the interpretation of the evidence including 'emerging adults' as well as younger children in 'transitional life stages'

education institutions with students of 13-24 years

This data is a list of all known educational institutions for people aged 13-24 and are derived from a current Local Authority list, and as such can be considered a reliable source.

These locations have been included as they represent areas where younger people will be present in greater numbers at certain points of the day.

## **6. The changing environment of gambling**

### **6.1 Stakeholder perspective: How has the environment of gambling changed in the past 10yrs?**

The gambling landscape has changed exponentially in the past 10 years due to on-line/internet gambling – hand-held technology has spawned a whole new customer base. Gambling is now 24/7, anonymous, and engages a higher volume of users.

Recent statistics expressed that 1 in 5<sup>9</sup> of the United Kingdom are now gambling on-line. However, the most alarming statistic is that over 500,000<sup>9</sup> children are reported to gamble each week. The most predominant demographic however is professional males aged between 18-35 years old<sup>10</sup> who invariably are in uncontrolled environments where warnings and control are very limited.

The ‘hidden’ gambling landscape is the damage to company profitability, branding and reputation, particularly where clients are involved. Criminal acts involving gambling particularly in the financial services sector is increasing, and figures recently released indicate that gambling fraud is now responsible for 12.5% of all frauds in the United Kingdom.<sup>10</sup>

Television gambling advertisements have risen 600% from 234,000 in 2007 to 1.4m in 2012.<sup>11</sup> These advertisements produced 30.9bn ‘impacts’ – i.e. the number of times a commercial was seen by viewers. Gambling advertising on social media has also increased as the gambling industry owns a ‘freedom’ on the internet that it has never been able to fully realise in the actual, physical world.

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<sup>9</sup> Gambling Commission – Young People and Gambling 2016

<sup>10</sup> EPIC Risk Management

<sup>11</sup> Ofcom Research - 2012



## 7. The Local Area Profile of the City of London

### 7.1 Introduction

The City of London is the financial district and historic centre of London. It is one of the 33 areas with local authority responsibilities into which London is divided. Administratively, London is divided into 32 boroughs and the City of London.

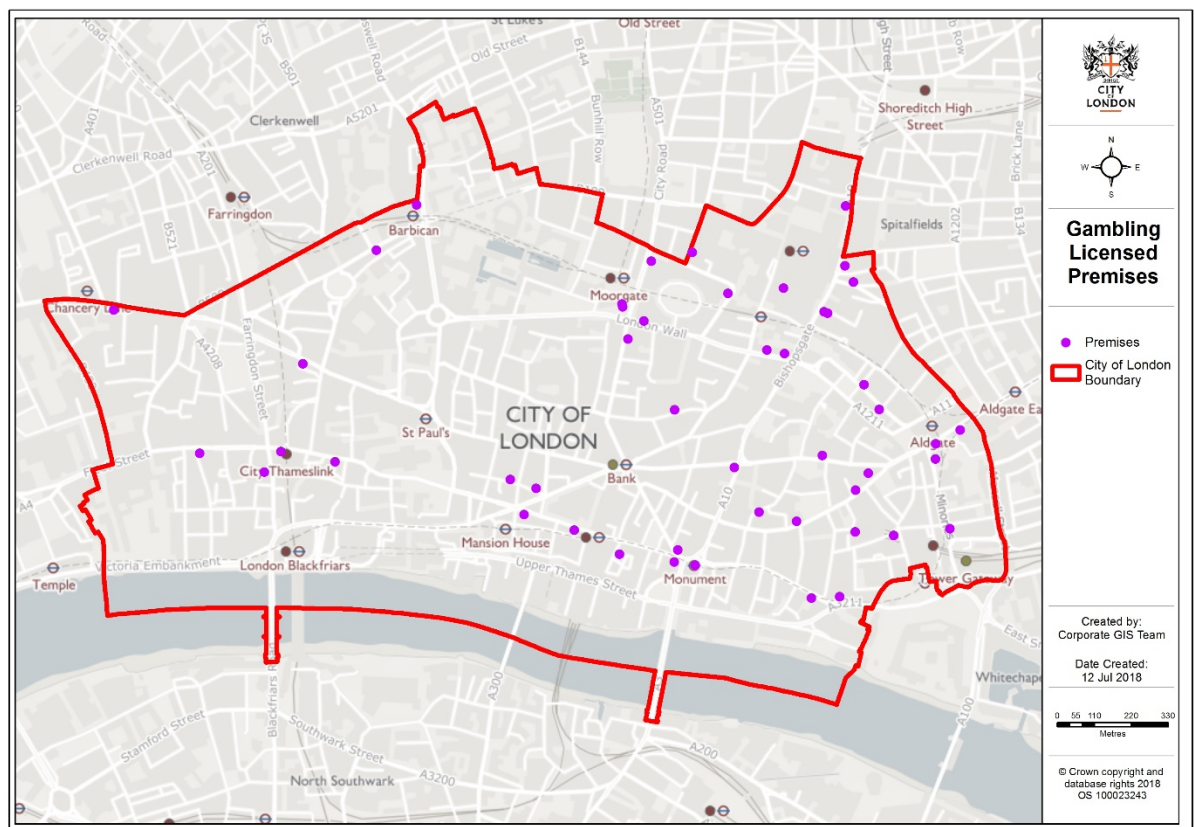
The City of London has a unique demography with a relatively low residential population but an estimated daily working population of approximately 400,000. The City is the only area in the United Kingdom in which the number of workers significantly outnumber the residents.

Additionally, over 18 million tourists visit London every year many of which visit the City of London as they acknowledge that the City is home to many popular attractions including St Paul's Cathedral, the Monument to the Great Fire of London, Guildhall galleries, Barbican Centre and the Museum of London.

### 7.2 Gambling premises

Within the City of London there are 36 Licensed Gambling Premises, and the number has remained stable since the inception of the Gambling Act 2005. The majority of gambling premises are situated in the eastern half of the city.

The map below provides an overview of all current licences within the City of London:



### **7.3 City of London's 'hot spot' affected most by gambling-related harm**

Although gambling is a legal entertainment activity it has been recognised that if you work in the financial services industry, you are at a greater risk of developing a gambling dependency than other professions. It is estimated 1 in 30<sup>12</sup> employees in the financial services sector are suffering from a gambling addiction.

Coincidentally our stakeholders also confirmed that those working in the financial services sector are at a greater risk of developing a gambling addiction – it is now the most prevalent sector in the United Kingdom and rising.

Those who work in the financial services sector are commonly highly intellectual including executives, stock market traders and financial advisors who are gambling whilst at work. There are several common denominators which is intrinsically linked including:

- Adrenalin driven
- Thrill seekers
- Risk takers
- Optimistic outlook
- Competitive

The ward area of Portsoken within the City of London was highlighted as the area/location that was most likely to be affected by gambling-related harm, and ties in with the cluster of current licences in the east of the City of London, and the hub of the financial district.

### **7.4 GamCare Statistics**

The information above is evident in the recent statistic provided by GamCare.

In 2016/17 GamCare recorded 40% of HelpLine and NetLine calls, and during this time received calls from 400 people with a postcode in the City of London.

Additionally, GamCare were able to provide face-to-face counselling for 5 people registered within the City of London from their Clapham Junction offices, and an additional 41 clients at their Liverpool Street location (an overall increase from the previous year).

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<sup>12</sup> National Problem Gambling Clinic

## **7.5 Evidence review – who are the City of London’s vulnerable groups?**

Extracted from our stakeholder questionnaire surveys, and the evidence obtained from our various datasets, the following is a generic representation of those areas that put people most at risk of gambling-related harm within the City of London.

- Those individuals who are affected by an alcohol misuse/addiction.
- Those individuals who are affected by a drug, and or substance misuse.
- Those individuals who are homeless and sleeping/living rough on the streets (huddles of homelessness within the City of London include Liverpool Street, Tower Hill, Fleet Street, and the Barbican Estate).
- Those individuals who have low educational attainment and learning and intellectual functioning difficulties.
- Adults with mental health issues, depression, anxiety, and low self-esteem.
- Those individuals who have become socially isolated.
- Those individuals who are on low incomes or have experienced financial difficulties (in debt), loss of job and even bankruptcy.
- Those individuals who work within the financial sector (typically executives, traders, bankers etc.)
- Children who have a parent who gambles and are unable to provide for day-to-day living expenses, and asylum seeking young people.

## 7.6 Local Area Profile Table

As outlined overleaf the table below demonstrates which of the identified characteristics had first-hand evidence. The characteristics which are shaded in darker grey show where there was evidence to support that these characteristics are associated with a higher risk of harm.

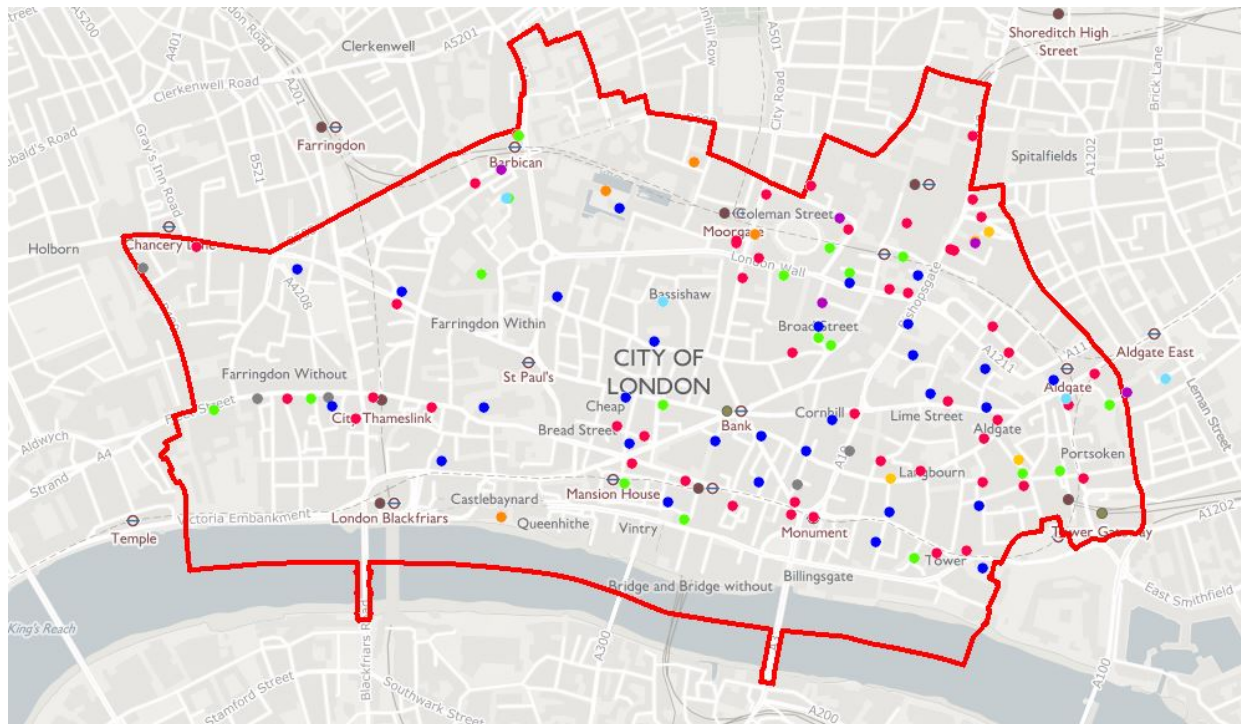
Lighter grey demonstrates emerging evidence, and the remaining characteristics are mixed/limited or no evidence.

Demographics	Socio-economic	Poor judgement/ Impairment	Other
Youth	Unemployment	Low educational attainment	Poor mental health
Older people	Low Income	Low IQ	Substance abuse/ misuse
Women	Deprived areas	Under influence alcohol/drugs	Problem gamblers
Ethnic Groups	Financial difficulties/debt	Learning disabilities	Financial Workers
	Homeless	Personality Traits	
	Immigrants		
	Prisoners/ probation		

## 7.7 Demographic Profile

The City of London Licensing Authority has identified specific concerns and risks relating to gambling in the local area.

The map below provides an overview; however the full demographic profile has been visually mapped and can be found at [Map Profile](#).



- Addiction Support
- Education Establishments
- Financial
- Gambling Licenced Premises
- Healthcare Services
- Homelessness Support
- Mental Health Support
- Religious Institutes

## 8. Summary

The City of London's very unique demography resonated with our stakeholders who confirmed the long-standing knowledge that those working in jobs that involve high-level financial risk (executives, traders and financial advisors) are at a greater risk to gambling-related harm.

The introduction of smart phone technology and the installation of gambling applications has engaged a higher volume of users. It's anonymous hence being regarded as a hidden addiction. Those who are gambling on-line are specifically professional males aged between 18-35 years old<sup>13</sup> who are in uncontrolled environments where warnings and control is limited, and often during work hours.<sup>13</sup>

Advertising is now seen regularly by a younger audience<sup>14</sup>, and the number of gambling commercials on British TV has increased exponentially since the deregulation of the sector nearly 10 years ago, and since the Gambling Act 2005 came into force in September 2007.

Consequences of this are two-fold:

- The harm it causes to the gambler themselves, their employer, their colleagues, family, extended family, friends, and the community.
- The cost it causes to the UK Government in health care, welfare, housing and to the criminal justice system.

The City of London's transient workforce, those working on the plethora of construction sites around the city are not immune to gambling-related harm. We have no evidence to support this, however it would be wrong not to at least remark on this situation.

How can we protect those vulnerable to gambling-related harm?

The majority of our stakeholders reacted by proposing that statutory safeguarding measures be imposed, additional support resources be available, and improved links with networks (family and other community) where appropriate.

Preventative technology, restricting financial transactions (high-stakes) for on-line gambling, paralleled with better education and reduced promotional material (TV, point-of-sale, street advertising), and additionally a fit for purpose at work policy, including a risk-register.

These are long term aspirations and mainly outside the control of the City of London Licensing Team. However, to assist licensees of gambling premises, a document providing guidance on undertaking gambling risk assessments has been produced. The document provides information on how and when a risk assessment should take place based upon the Gambling Statement of Principles and the information provided in this Local Area Profile.

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<sup>13</sup> EPIC Risk Management

<sup>14</sup> Ofcom research - 2012

## Stakeholder Consultation Survey Questionnaire

### **Introduction**

The Gambling Act 2005 (The Act) gives Local Authorities responsibility for issuing premises licences for gambling venues. The Act requires that Local Authorities should 'aim to permit' premises licences as long as they are consistent with three objectives, one being 'protecting children and other vulnerable persons from being harmed or exploited by gambling'.

In April 2016 the Gambling Commission (the Commission) introduced new provisions of a social responsibility code within the Licence Conditions and codes of Practice (LCCP), which require gambling operators to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate those risks. It is a change in national policy and is intended to provide a well evidenced and transparent approach to considering and implementing measures to address the risks associated with gambling.

To date, there has been little investigation about who may be vulnerable or why, and how vulnerability and harm may vary at a local level has not been explored. This survey aims to assist the City of London fill this gap, and aim to map our results visually, so that areas of potential risks are highlighted. Our intention is that these results become a tool for when making a decision about the location of gambling venues, consider the needs of the local communities and enable the City of London to develop plans to protect vulnerable people.

We would be very appreciative if you could please take the time to complete this survey which should take 20-30 minutes. Please comment on your responses as appropriate in the areas provided.

The City of London Corporation is a registered data controller under the Data Protection Act 1998 (DPA), and will process any personal information provided by you in accordance with that Act.

By providing your information, you are confirming that you consent to your information being processed in this way. If you would like further information at any point, please contact Andre Hewitt, Licensing Officer on 0207 332 3406.

### **Section 1: Gambling related-harm**

1. What does the term gambling-related harm mean to your organisation?
2. How does this differ from problem gambling?
3. Do these differences matter? If so, in what way?
4. What different types of harms arise from gambling?
5. Who do these different harms affect?
6. How might harms vary from person to person?
7. Over what time frame might harm be experienced?
8. Can you please identify what area/location within the City of London you know is affected most by gambling-related harm.

## Section 2: Vulnerable people

9. How would you identify vulnerability?
10. What does the term 'vulnerable people' mean to your organisation?
11. In respect of your answer to Question 10, what type of vulnerable groups interact with your organisation?
12. In respect of your answer to Question 11, what measures might be used to protect vulnerable people?
13. In respect of your answer to Question 12, which groups specifically?
14. Who would you consider to be vulnerable to gambling-related harm?
15. Are these groups different to those who are vulnerable to gambling problems?
16. In respect of your answer to Question 15, why is that? Is this evidence based?
17. Which groups do you think are *most* vulnerable to gambling-related harm?
18. What are the characteristics that suggest someone is vulnerable to gambling-related harm?
19. How do you think the characteristics of who is vulnerable have changed over the last 10 years?

## Section 3: Other

20. Do you think there is a conflict between the local authority's function under The Gambling Act 2005 in aiming to permit licences and the objective of protecting vulnerable people? Which should take precedence and why?
21. Is there anything else you would like to add on this topic?

## Thank you for completing this survey.

22. Could you please indicate below the capacity in which you are making your comments?
  - ☐ Gambling Care Provider
  - ☐ Community Service Provider (including Police & Fire Brigade)
  - ☐ Drug and Alcohol Treatment Provider
  - ☐ Education Provider
  - ☐ Financial Advice Provider
  - ☐ Healthcare Service Provider (including GP Surgery's & Hospitals)
  - ☐ Homelessness Support Provider (including accommodation)
  - ☐ Mental Healthcare Service Provider
  - ☐ Religious Establishment
  - ☐ Other (please specify)





# **Guidance on Undertaking Local Gambling Risk Assessments**

Gambling Act 2005

January 2018

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<b>Appendix A</b>	City of London Corporation Local Gambling Risk Assessment Template
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## 1. Introduction

- 1.1 The Gambling Commission (the Commission) has introduced new provisions in its social responsibility code within the Licence Conditions and Codes of Practice (LCCP), which require gambling operators to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate those risks. This change in national policy is intended to provide a well evidenced and transparent approach to considering and implementing measures to address the risks associated with gambling.
- 1.2 The introduction of new provisions in the social responsibility code within the LCCP encourages Local Authorities, the Commission and the industry to work in partnership to address local issues and concerns.
- 1.3 The risk based approach provides a better understanding of, and enables a proportionate response, to risk. This approach includes looking at future risks and thinking about risks in a probabilistic way. Risk is not necessarily related to an event that has happened. Risk is related to the probability of an event happening and the likely impact of that event. In this case it is the risk of the impact on the licensing objectives.
- 1.4 The City Corporation has developed this guidance to assist gambling operators in undertaking and preparing their local (premises) risk assessments. This guidance provides a framework for the local risk assessment process that will provide a uniform approach across all non-remote gambling sectors. This will benefit the City Corporation as Licensing Authority under the Gambling Act 2005 (the Act), as well as responsible authorities and interested parties when considering new and variation applications. The local risk assessment will also enable the City of London Corporation to establish a more progressive compliance inspection regime.
- 1.5 Gambling operators had to undertake a risk assessment for all of their existing premises by 6th April 2016. Following that date operators must undertake a review of those assessments when certain triggers are met. These triggers, along with the Licensing Authority's views on what would instigate either a new assessment or the review of an existing one are detailed within this guidance document.
- 1.6 The Licensing Authority considers that these local risk assessments are a key component of the overall assessment and management of the local risks. The Licensing Authority will assist operators in this process by providing specific information on its concerns surrounding gambling within the City and the impact that premises can have on the licensing objectives through the development of a local area profile.

- 1.7 This local risk assessment process is not the same as other forms of risk assessment undertaken by gambling operators, such as Health and Safety at Work, Fire Safety and Food Hygiene, etc. These local risk assessments are specific to the potential harm that gambling premises can have on one or more of the licensing objectives under the Act. They are specific to the premises, the local area and the local community.

## **2. Background**

- 2.1 The City of London Court of Common Council is the Licensing Authority for the City of London in terms of the Act. The Licensing Authority is responsible for considering and determining applications for premises licences which offer gambling facilities within the City of London.
- 2.2 The Act contains three licensing objectives which guides the way that the Licensing Authority performs its function and the way that gambling operators carry on their activities. They are:
- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.
  - (b) ensuring that gambling is conducted in a fair and open way.
  - (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 2.3 The Act places a legal duty on the Licensing Authority to aim to permit gambling in so far as it thinks it reasonably consistent with the licensing objectives. The effect of this duty is that the Licensing Authority must approach its functions in a way that seeks to regulate gambling by using its powers where appropriate, for example to attach conditions to licences to moderate their impact on the licensing objectives, rather than by setting out to prevent gambling altogether.
- 2.4 The Licensing Authority will set out how it intends to carry out its functions under the Act in its Policy Statement. This statement is kept under review and is updated every three years (as a minimum).
- 2.5 The Commission is responsible for issuing operating licences to gambling operators who are deemed suitable and competent to provide facilities for gambling. As a requirement of these operating licences operators must ensure that they comply with and meet the requirements of the LCCP.
- 2.6 Although gambling is a legal entertainment activity it can, in some locations have a negative impact on individuals and the wider community. The City Corporation has understood its responsibility in trying to comprehend how gambling can affect its residents, work-force, and visitors. The City Corporation

has actively been examining individuals and vulnerable groups who are potentially susceptible to gambling-related harm.

- 2.7 In February 2015, following substantial consultation with relevant stakeholders the Commission introduced a new social responsibility code provision making it a requirement for certain gambling operators to assess the local risks to the licensing objectives posed by each of their premises based gambling operations. The Commission also introduced an ordinary code provision relating to sharing local risk assessments. Both provisions came into effect on 6 April 2016. The relevant provisions of the code state:

**Social responsibility code provision 10.1.1**

**Assessing local risk**

**All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences. This provision came into effect on 6 April 2016.**

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments:
  - (a) To take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
  - (b) When there are significant changes at a licensee's premises that may affect their mitigation of local risks;
  - (c) When applying for a variation of a premises licence; and
  - (d) In any case, undertake a local risk assessment when applying for a new premises licence.

**Ordinary code provision 10.1.12**

**Sharing local risk assessments**

**All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences. This provision came into effect on 6 April 2016.**

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

- 2.8 These code provisions came into effect on 6th April 2016. As a result, all premises that provide facilities for gambling within the City of London must be assessed to identify the local risks posed by the provision of gambling facilities in their respective locations. This guide will assist operators in complying with these code provisions.

### 3. Risk assessment triggers

- 3.1 The local risk assessment code provisions provide a number of triggers for when a new assessment is required and for when an existing one requires review. This section sets out the Licensing Authority's views on what these triggers are and when operators should provide a copy of their assessments to the Licensing Authority.

#### **New premises**

- 3.2 If an operator intends to apply for a new premises licence under Part 8 of the Act then a local risk assessment must be carried out. That assessment should be based on how the premises are proposed to operate at the premises location and must consider the local area. The completed assessment should be provided with the application for a new premises licence upon submission to the Licensing Authority.

#### **Significant changes in local circumstances**

- 3.3 Operators are required to review their local risk assessment if significant changes in local circumstances occur. Changes to local circumstances happen frequently and can be either temporary or permanent depending on the change, how long that change will remain in place and how it affects the local area. However, the requirement for review of the risk assessment is only applicable when that change is significant.
- 3.4 The following list sets out some examples of what the Licensing Authority considers to be significant local circumstances:
- Any substantial building development or conversion of existing premises in the local area which may increase or decrease the number of visitors. For example, where a new office building is constructed nearby.
  - Any new pay day loan or pawn brokers open in the local area
  - Changes are made to the provision, location and/or timings of public transport to the local area, such as a bus stop which has been used by children to attend school is moved to a location in proximity to gambling premises or where London Underground services to a local station are extended later into the evening.
  - Educational facilities increase in the local area. This may occur as a result of the construction of a new school/college or where a significant change is made to an existing establishment.
  - The local area is identified as a crime hotspot by the police and/or Licensing Authority.
  - Any vulnerable group which is identified by the Licensing Authority or venues relating to those vulnerable groups are opened in proximity to gambling premises (e.g. additional homeless hostels or gambling or mental health care/support facilities are opened in the local area).

- A new gambling premises opens in the local area.

3.5 The list above is not an exhaustive list of what could be considered significant changes in local circumstances. The Licensing Authority will provide information to gambling operators when it feels a significant change has occurred in the local area. The Licensing Authority will set out what that change is and may provide information on any specific concerns it may have that should be considered by operators.

However, operators must also consider what is happening in their local areas and it is their responsibility to identify significant changes which may require a review and possibly an amendment to their risk assessment. A significant change can be temporary, and any temporary changes should be considered and adjustments made to the local risk assessment if necessary.

### **Significant changes to the premises**

3.6 From time to time operators will undertake a refresh of the premises' layout and décor, which is unlikely to prompt a review of the risk assessment for that premises. However, where there is a significant change at the premises that may affect the mitigation of local risks, then an operator must review its risk assessment and if necessary update it, taking into account the change and how it may affect one or more of the licensing objectives.

3.7 The following list sets out some examples of what the Licensing Authority considers to be significant changes to the premises (some of which may also require a variation to the existing premises licence). As with the examples of significant changes in local circumstances set out previously, the following list is not an exhaustive list – operators must consider whether any change that they are proposing to their premises is one that may be considered significant.

- Any building work or premises refit where gambling facilities are relocated within the premises.
- The premises licence is transferred to a new operator who will operate the premises with its own procedures and policies which are different to those of the previous licensee.
- Any change to the operator's internal policies which as a result requires additional or changes to existing control measures; and/or staff will require retraining on those policy changes.
- The entrance or entrances to the premises are changed, for example, the door materials are changed from metal with glazing to a full glass door or doors are reallocated from egress to ingress or vice versa.
- New gambling facilities are made available on the premises which were not provided previously, for example, bet in play, handheld gaming devices for customers, Self Service Betting Terminals, or a different category of gaming machine is provided.

- The premises operator makes an application for a licence at that premises to provide an activity under a different regulatory regime e.g. to permit the sale of alcohol.

3.8 The Licensing Authority will not, as general practice, request a copy of the reviewed risk assessment if a significant change to the licensed premises has occurred, unless the change is one that will necessitate a variation application.

#### **Variation of the premises licence**

3.9 Variations to premises licences are only those required to be made under section 187 of the Act and will not include changes of circumstances such as a change of premises' name or a change of licensee's address, etc.

3.10 When preparing an application to vary the premises licence the operator must undertake a review of the local risk assessment and update it if necessary. Operators submitting a variation application to the Licensing Authority should provide a copy of the reviewed local risk assessment when submitting the application.

#### **Regular review of risk assessment**

3.11 As a matter of best practice the Licensing Authority recommends that operators establish a regular review regime in respect of their local risk assessments. This review programme can be carried out alongside other reviews on Health and Safety risk assessments for the premises. This review programme would ensure that, regardless of whether any of the trigger events set out above have occurred, these risk assessments are considered at regular intervals and updated as necessary.

### **4. Local risks and control measures**

4.1 There are two specific parts to the risk assessment process, the assessment of the local risks, and the determination of appropriate mitigation to reduce those risks.

4.2 The risks that operators must identify relate to the potential impact a gambling premises and its operation may have on the licensing objectives. The gambling operator will be expected to identify and list all of the local risks within the assessment. The level of such risks can range from being low to very high depending on the potential impact they can have on the licensing objectives. The level of any given risk will have a direct impact on the type and extent of the control measures necessary to mitigate such risk.



- 4.3 This process is not new to gambling operators as they are already undertaking elements of this assessment, albeit in a far less formalised way. Operators will already be assessing locations when looking for new sites or when reviewing the performance of their premises. The design of premises is also assessed to ensure that they will meet the needs of the gambling operation, will provide protection for staff and customers; and will have facilities for recording crime. Operators will also have implemented policies and procedures for the operation of premises in line with statutory and other regulatory requirements placed upon them by the Commission and other agencies.
- 4.4 Operators will already be familiar with identifying risks in relation to health and safety legislation. Risk assessments are also used for security and crime purposes, for example for money laundering and as part of trade association best practice, such as the Safe Bet Alliance.
- 4.5 This local risk assessment process, although similar requires a much broader range of considerations when identifying local risk. Operators must consider the local area in which the premises are situated, the gambling operation and the premises both internally and externally.

#### **Local area risks**

- 4.6 There are a number of factors relating to the local area that operators may identify as local area risks which are independent of who the operator believes is their target market. While it is for the operator to identify and determine these factors, the Licensing Authority considers the following list may be of assistance to operators in identifying local area risks:
- The types of premises and their operation in the local area surrounding these premises.
  - The footfall in the local area, for example, does it predominately comprise residents, workers or visitors.
  - Transport links and parking facilities.
  - Educational facilities.
  - Community centres.
  - Hospitals, mental health or gambling care providers.
  - Homeless shelters, hostels and support services.
  - The age and economic makeup of the local community
- 4.7 The local area will be different depending on the premises and the size of its operation.

### **Gambling operational risks**

- 4.8 The gambling operation relates to how the premises will be or is run. This will include the operator's policies and procedures which have been put in place to meet the requirements of the business, the Act and/or specific code provisions within the LCCP. It will also include other elements such as:
- The gambling products it provides in the premises.
  - The facilities to enable gambling within premises.
  - Marketing materials within premises
  - Security and crime prevention arrangements.
  - Shop displays and provision of information to customers.
  - Staffing levels.
- 4.9 It is likely that the identification of risks associated with this element of the assessment will be very similar for all premises with slight variations depending on any specific factors that relate to the premises or the local area.
- 4.10 The control measures that operators will put in place to mitigate any risk associated with the gambling operation will be dependent on the type of gambling activities provided, how the company operates and the size of the organisation.

### **Premises design risks**

- 4.11 The design of the premises is an extremely important factor when considering local risks. For example, premises which are located within an area which has a high number of children and young people present throughout the day may identify that their standard external design means that children and young people can see into the premises and see gambling taking place. The appropriate mitigation in this case may be for the operator to amend the premises design by installing a screen or by covering the windows to obscure the interior of the premises. Such changes would be considered as control measures to mitigate the risk of attracting children to gambling.
- 4.12 As part of the design process, the layout of the premises is a major consideration as poorly conceived design may create significant risks to one or more of the licensing objectives.

### **Interior design risks**

- 4.13 The internal design and layout will reflect the premises operation and the type of gambling facilities that it offers. For some premises the design will be subject to certain limitations due to mandatory conditions on the gambling premises licence such as restrictions on the location of Automated Teller Machines (ATM's), and unobstructed views in placing Gaming Machines.

- 4.14 Operators will need to assess the risk presented by the internal layout of the premises and the location of gambling facilities within them. For example, if a gaming machine is placed within the direct line of sight of the cashier counter then staff will be able to monitor player behaviour and undertake interventions if there is a concern over the customers' spending habits. Staff can also monitor the use of the machines and can challenge any customers who are believed to be under the age of 18, or who damage the machines, or who appear to be attempting to launder money. By a simple assessment of the optimum location for these machines, operators can significantly reduce the risk to the licensing objectives.

### **Exterior design risks**

- 4.15 The exterior of premises will be a major advertisement for the gambling operator. However, the design will need to be assessed based on the associated risk. Operators will identify the risk associated with the design and introduce control measures based on that perceived risk. For example, if the premises have a large amount of glass frontage in an area prone to criminal damage, operators may consider the risk of damage to the standard toughened glass to be high and introduce a control measure such as roller shutters and/or external CCTV.

### **Control measures**

- 4.16 Depending on the nature of the risk factors, the control measures identified to mitigate the perceived risk may be a combination of systems, design and physical measure. Control measures that relate to systems will be measures that have been put in place through policies and procedures. These can either be systems that apply to all of the operator's premises or systems that have been developed specifically for particular premises to deal with a specific local risk factor. System control measures will include staff training, security policies and procedures. They may also relate to having security personnel on entrances, implementing membership criteria and/or providing support to local vulnerable groups through financial or other means.
- 4.17 Design control measures are measures that are built into the design of the premises. These can include the location of gambling facilities and the design and location of cashier counters within the premises, and the exterior design of premises. For example, a control measure for the interior of the premises could involve moving a cashier counter from the rear of the premises to the front next to the main entrance. An external design control measure may involve the exterior design being tailored to address local risks, for example, more open window displays to enable staff to see out of the premises or a design to avoid attracting children to the premises.
- 4.18 The final control measures relate to specific physical measure that will address an identified risk factor. These physical control measures may, for example,

include alarms, CCTV cameras, doors, magnetic locks, time locks on safes, window shutters, UV lights in toilets.

- 4.19 As aforesaid, the control measures identified to mitigate a perceived risk may involve a combination of systems, design and physical measures. For example to address the risk factors relating to children gaining access to an over 18 restricted gambling premises, the operator may identify the following control measures:

Systems: PASS card or age verification policies, challenge 21 scheme, staff training and door staff.

Design: Exterior design which will not attract children into the premises, the entrance layout will enable staff and security to watch those entering the premises and challenge them on the grounds of age.

Physical: Magnetic door locks, ID scans, and door staff.

- 4.20 As outlined in the code provisions, applications for new premises licences and for variations to existing licences will require a local risk assessment. The control measures specified in these risk assessments may be incorporated into the new or varied premises licences through the imposition of appropriate conditions.

## **5. Undertaking a local risk assessment**

- 5.1 A local risk assessment of gambling premises should be embarked on through a step-by-step approach. The approach that the Licensing Authority suggests is to first assess the local area and identify the relevant risk factors, then to assess the gambling operation, and finally to assess the premises design, both internal and external. Once the risk factors have been identified, the control measures to mitigate the risks should be considered. These control measures will either already be in place or will need to be implemented. To assist, the Licensing Authority has developed a local risk assessment form that encompasses the step-by-step approach to the assessment (See Appendix A). While operators can develop their own style of local risk assessment, they are encouraged to have regard to the issues set out in this Guidance. The form also enables the assessor to identify actions such as the installation or production of control measures, the individual made responsible for carrying out those actions, and to record when those actions were completed.

### **Who should undertake the assessment**

- 5.2 It will be the responsibility of the gambling operator to assign the assessor for assessing the local risks for their premises. The person assigned as the assessor must be competent to undertake this role as failure to properly carry out this function could result in a breach of the provisions of the LCCP. The assessor must understand how the premises operate or will operate, its design, and

where it is located. The assessor will need to understand the local area and can use staff or area managers to assist in gaining an understanding of that local area.

### **Step 1: The local area**

- 5.3 Operators will be expected to identify the local risk factors surrounding the premises. The risk factors will differ from location to location therefore a clear understanding of the specific characteristics of the local area and the people who live, work or visit that area is imperative.
- 5.4 To assist in assessing the local area the Licensing Authority has produced a Local Area Profile within its Statement of Licensing Principles. The Local Area Profile sets out the demographic profile area of the City of London, and the specific concerns and risks that the Licensing Authority has identified in relation to gambling in those areas. The mapping tool can be found at [Profile Map](#).<sup>1</sup>
- 5.5 The first step is to identify the local risk factors associated with the local area in which the premises are located. Local risk factors are risks that affect one or more of the licensing objectives. The Licensing Authority Statement of Licensing Principles will identify some of these risk factors which are considered to be of significance for areas of the City.
- 5.6 The list below is a small representative example of some of the risk factors that may be present in an area where gambling premises are located:
- The types of premises and their operation in the local area surrounding these premises.
  - Transport links and parking facilities.
  - Educational facilities.
  - Community centres.
  - Hospitals, mental health or gambling care providers.
  - Homeless shelters, hostels and support services.
  - Significant presence of young children.
  - High crime and unemployment area.
  - Nearby alcohol or drug support facility.
  - Pawn broker/pay day loan businesses, food banks and soup kitchens in the vicinity.
  - Other gambling premises in the vicinity.

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<sup>1</sup>

[http://www.mapping.cityoflondon.gov.uk/geocortex/mapping/?viewer=compass&runworkflowbyid=Switch\\_layer\\_themes&LayerTheme=Show%20the%20Gambling%20Risk%20Layers](http://www.mapping.cityoflondon.gov.uk/geocortex/mapping/?viewer=compass&runworkflowbyid=Switch_layer_themes&LayerTheme=Show%20the%20Gambling%20Risk%20Layers)

## **Step 2: The gambling operation**

- 5.7 In assessing the risk factors associated with a gambling operation the assessor should take into account the local risks which are commonly accepted by broader stakeholders and how that gambling operation may affect that risk.

The assessor may wish to consider:

- how the gambling operation will relate to how the operator conducts its business
- what gambling products it provides in the premises
- the facilities to enable gambling within the premises
- the staffing levels within the premises
- the level and requirement for staff training
- whether loyalty or account cards are used or not
- the policies and procedures it has in place in relation to regulatory requirements of the Act or to comply with the LCCP
- the security and crime prevention arrangements it has in place
- how it advertises locally and on the premises
- the marketing material within the premises
- the display and provision of information, including the ability to signpost customers to support services with respect to problem gambling, financial management, debt advice etc.

## **Step 3: The design of the premises**

- 5.8 The design and layout of the premises is a key consideration as this could have a significant impact on the risk to the licensing objectives. In assessing the risk factors associated with the premises design and layout reference is needed to the local area risks factors already identified to ensure the design doesn't add to that risk. The design, both internal and external should be considered and specific risk factors identified and noted. For example:

- the premises may have a number of support pillars which the assessor identifies as obstructing the view of the gaming machines from the cashier counter.
- premises which are located within an area which has a high number of children and young people present throughout the day, may identify that their standard external design means that children and young people can see into the premises and see gambling taking place.
- if a premises has a large amount of glass frontage in an area prone to criminal damage, the assessor may consider the risk of damage to the standard toughened glass to be high.

These would be identified risk factors that would need to be documented.

#### **Step 4: Control measures**

- 5.9 Once the risk factors have been identified, the assessor should seek to identify control measures that would mitigate the identified risks. Such control measures will relate to one of the three categories of control measures mentioned above (systems, design and physical). Some risk factors may require a combination of control measures to adequately mitigate the risk.

#### **Completed Assessments**

- 5.10 The control measures must be implemented on the premises, and if applicable, staff on the premises should be trained in their use or trained on the new policy and procedure. The assessment must be retained and should be reviewed whenever a trigger occurs or as part of a regular review regime (as outlined).
- 5.11 Where appropriate the Licensing Authority will assess the risks identified and the measures implemented to mitigate those risks. When a completed assessment is provided with a new application or with a variation application, the Licensing Authority will consider the assessment in the course of determining whether to grant the application or not. Some control measures identified in the assessment may be put forward as conditions to be attached to the licence to address any significant local concerns.



## Local Area Gambling Risk Assessment Template

### Notes for completing this form

This risk assessment must be completed for all new premises or when the premises licence is varied. The assessment must also be reviewed when there are any significant changes to either the local circumstances and/or the premises.

#### Licensing Objectives:

The Gambling Act 2005 (The Act) gives Local Authorities responsibility for issuing premises licences for gambling venues. The Act requires that Local Authorities should 'aim to permit' premises licences so long as they are consistent with three objectives:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
2. Ensuring that gambling is conducted in a fair and open way, and
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

#### Risks:

Area of consideration that may impact on one or more of the licensing objectives.

#### Local Risks:

These are the identified factors that may pose a risk to licensing objectives by virtue of the provision of gambling facilities at the premises.

#### Control Measures:

These are measures that the operator can put in place to mitigate the risk to the licensing objectives from the risk factors.

#### Frequency of Review:

Operators will need to specify the time period in which a review of this risk assessment should be carried out. The frequency will be up to the gambling operator but it should be longer than 36 months.



## Local Area Gambling Risk Assessment

Premises number or Licence No:

Ward:

Area (if applicable):

Premises address:

Category of gambling premises licence:

Name of person completing assessment:

Date of Assessment:

Review Date:

Notes:

## 1. Local Area

Licensing Objective		Risks	Existing Control Measures	Further Controls Recommended
1.1	Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime			
1.2	Ensuring that gambling is conducted in a fair and open way			
1.3	Protecting children and other vulnerable persons from being harmed or exploited by gambling			

## 2. Gambling Operation & Physical Design (Internal and External) (and External)

Licensing Objective		Risks	Existing Control Measures	Further Controls Recommended
2.1	Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime			
2.2	Ensuring that gambling is conducted in a fair and open way			
2.3	Protecting children and other vulnerable persons from being harmed or exploited by gambling			

### 3. Action Plan

Local Area Risk (insert number)	Gambling Operation and Physical Design Risk(insert number)	Question	Action required	Action by Whom (name)	Action by When (name)	Date completed

## Report – Community and Children’s Services Committee

### Report of Urgent Action Taken: Gateway 4b – York Way / Middlesex Street Estate Communal Heating, Hot Water and Ventilation Works

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

#### **SUMMARY OF ACTION TAKEN**

1. In July 2018, the Projects Sub-Committee and the Community and Children’s Services Committee approved a combined Gateway 3/4 project report relating to the replacement of the heating, hot water and ventilation facilities at both the York Way and Middlesex Street Estates. This followed the undertaking of condition surveys and feasibility studies across the two mentioned Estates, during which it had become apparent that the systems were at the end of their current lifecycles and needed replacement. The surveys had determined that a like-for-like replacement was the preferred option, and this approach was supported by both Committees. The anticipated total cost of the project would be £5.2m.
2. Due to the project value being above £5m, it had been originally planned that the project would proceed down the ‘complex’ route, as per the project procedure. However, given the expected scope of the works at both Estates (both have over 200 residential units run from their respective communal systems) and their non-proximity to each other, officers proposed that separating the works into two discrete projects would be the best way to expedite activity. The Projects Sub-Committee was supportive of this approach.
3. This would normally take the project (now two projects) away from the ‘complex’ route and remove the requirement for Court of Common Council approval at Gateway 4b stage to allow the projects to proceed.
4. However, since that time it became apparent that it may be possible and desirable to award both projects to the same contractor. This would allow for economies of scale and thereby afford the opportunity to seek percentage reductions in tenders. Given the possibility that the two projects (whilst managed separately) could be delivered by the same contractor as part of a single overall contract, it was therefore prudent and appropriate to seek the approval of the Court. This is in view of the overall value of the contract and in line with the spirit of the project procedure.
5. Approval was therefore granted to allow the Middlesex Street Estate and York Way Estate Communal Heating and Hot Water system replacement projects to proceed, being managed as two separate projects at an estimated cost of £5.2m.

6. It having become apparent that Court approval was required (and with the next formal meeting of the Court not scheduled until December 2018), approval was sought and obtained under urgency procedures pursuant to Standing Order No.19 to allow for the tender exercises to be completed and contracts awarded, thereby minimising further delay to the project.

## **RECOMMENDATION**

7. We **recommend** that the urgent action taken be noted.

All of which we submit to the judgement of this Honourable Court.

DATED this 16<sup>th</sup> day of November 2018.

SIGNED on behalf of the Committee.

**Randall Keith Anderson**  
Chairman, Community and Children's Services Committee

## Report – Establishment Committee

### Report of Urgent Action Taken: New Post of a Grade J Chief Operating and Financial Officer, City of London Police

*To be presented on Thursday, 6<sup>th</sup> December 2018*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

#### **SUMMARY OF ACTION TAKEN**

1. In November 2018, your Establishment Committee under urgency procedures approved the introduction of a new post of a Grade J Chief Operating and Financial Officer for the City of London Police.
2. At present, financial oversight for the City of London Police is spread across different departments and it has become apparent that for coordination and strategic direction, there is a need for a Chief Operating and Financial Officer.
3. The postholder will be responsible for a number of Departments within the City of London Police, they will provide leadership and direction to the business operational activities and will act as the designated Chief Financial Officer under the Police and Social Responsibility Act 2011.
4. The role will also ensure that the City of London Police has the financial capacity to deliver the Force's Corporate Plan and provide the leadership and direction required across the entire portfolio of responsibility.
5. The post will be financed from existing funds within the City of London Police budget.
6. Due to the need to recruit immediately, approval was therefore sought and obtained under urgency procedures pursuant to Standing Order No.19 for the introduction of a post of a Grade J Chief Operating and Financial Officer for the City of London Police.

#### **RECOMMENDATION**

7. We **recommend** that the urgent action taken be noted.

All of which we submit to the judgement of this Honourable Court.

DATED this 25<sup>th</sup> day of November 2018.

SIGNED on behalf of the Committee.

**Charles Edward Lord, O.B.E., J.P., Deputy  
Chair, Establishment Committee**



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