

PLEASE BRING THIS AGENDA WITH YOU

1

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



COMMON COUNCIL

SIR/MADAM,

You are desired to be at a Court of Common Council, at **GUILDHALL**, on
THURSDAY next, **the 21st day of July, 2022**.

Members of the public can observe the public part of this meeting by following the link:
<https://youtu.be/3SgrHqYrZlw>

JOHN BARRADELL,
Town Clerk & Chief Executive.

*Guildhall,
Wednesday 13th July 2022*

Robert Howard

Emma Edhem

}

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 16 June 2022.

For Decision
(Pages 9 - 26)

4 **Mayoral Engagements**

The Right Honourable The Lord Mayor to report on his recent engagements.

5 **Policy Statement**

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

6 **Licensing Committee**

To consider proposals relating to the review of the Statement of Licensing Principles.

For Decision
(Pages 27 - 104)

7 **Appointments**

To consider the following appointments:

Where appropriate:-

** denotes a Member seeking re-appointment*

- (A) Three Members on the **Board of Governors of the City of London School**, for two terms expiring in July 2026 and one term expiring July 2024.

(Contest)

Nominations received:-

Florence Keelson-Anfu

*Ian Seaton

Luis Tilleria

*Deputy James Thomson

- (B) One Member on the **Board of Governors of the City of London School for Girls**, for a term expiring in July 2026.

(No contest)

Nominations received:-

Anett Rideg

- (C) Three Members on the **Board of Governors of the City of London Freeman's School**, two for a term expiring in July 2024 and one for a term expiring July 2023.
(No contest)
Nominations received:-
Alderman Christopher Makin
- (D) One Member on the **Education Board**, for a term expiring in April 2023.
(Contest)
Nominations received:-
John Griffiths
Naresh Sonpar
Luis Tilleria
- (E) One Member on the **Licensing Committee**, for a term expiring in April 2026.
(No Contest)
Nominations received:-
James Bromiley-Davis
- (F) One Member on the **Freedom Applications-Committee**, for a term expiring in April 2023.
(No contest)
Nominations received:-
Alderman Emma Edhem
- (G) Two Members on the **Equality, Diversity & Inclusion Sub- Committee**, for terms expiring in April 2023.
(Contest)
Nominations received:-
Dr Joanna Abeyie
Jason Groves
Alpa Raja
Paul Singh
- (H) One Member on the **Barbican Residential Committee**, for a term expiring in April 2023.
(No contest)
Timothy McNally

For Decision

8 **The Freedom of the City**

- (A) To consider a circulated list of applications for the Freedom of the City.

For Decision
(Pages 105 - 110)

- (B) To report action taken in approving an application for the Freedom of the City of London under urgency procedures on behalf of the Court of Common Council, as there was insufficient time for the Court approval to be obtained in the usual way:

To Dalal Al-Duwaisan, wife to the Ambassador of Kuwait; being nominated by the Rt Hon The Lord Mayor and Chief Commoner, Simon Duckworth, Citizen and Skinner. Urgent approval was granted as the Ambassador of Kuwait was due to retire and return to Kuwait with Mrs Dalal Al-Duwaisan. It was anticipated that their return would be in advance of both the next meetings of the Freedom Applications Sub-Committee and the Court of Common Council and it was considered desirable to expedite the approval to allow the Ceremony to occur in advance of this.

For Information

9 Resolutions on Retirements, Congratulatory Resolutions, Memorials.

10 City of London Police Authority Board

To receive the 2021/22 Annual Report of the City of London Police, presenting the achievements of the Force during the past financial year.

For Information
(Pages 111 - 130)

11 Markets Board

To note action taken under urgency procedures in adjusting the composition of the Board.

For Information
(Pages 131 - 132)

12 Questions

13 Motions

To note one motion relating to Ward Committee appointments taken under urgency procedures since the last meeting in accordance with Standing Order 19 and 23(5)..

By Sir Michael Snyder

“That Alderman Alexander Barr be appointed to Port Health & Environmental Services Committee and Planning & Transportation Committee for the Ward of Cordwainer.”

In view of the scheduled timings for the meetings of these committees, and in the interests of ensuring the continued right of representation for the Ward of Cordwainer, the reappointment of Alexander Barr was granted by the Court under urgency procedures outlined in Standing Order 19 following his admission as Alderman.

14 **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 133 - 134)

15 **Ballot Results**

The Town Clerk to report the outcome of the several ballots taken at the last Court:

Where appropriate:-

★ denotes appointed.

7(F) One Members to the **Epping Forest & Commons Committee.**

Votes		
Ian Bishop-Laggett	-	37
Deputy Madush Gupta	-	47 ★

7(G) One Member to the **Board of Governors of the City of London School**

Votes		
Shahnan Bakth	-	79 ★
Luis Tilleria	-	8

7(H) One Member to the **Board of Governors of the City of London School for Girls**

Votes			
		First Round	Final Round
Martha Grekos ★	-	45	48
Jaspreet Hodgson	-	27	30
Anett Rideg	-	20	-

With no candidate obtaining 50% of the first preference votes, the candidate with fewest first preference votes was eliminated and next preference votes (as appropriate and where indicated) were transferred. This step was repeated and, following the second round of counting, Martha Grekos received a majority of votes cast.

7(I) One Member to the **Education Board**

Votes		
Steve Goodman	-	35
Deputy Madush Gupta	-	54 ★

7(J) Two Members to the **Audit & Risk Management Committee**

	Votes
Alderman Alexander Barr	- 60 ★
James Bromiley-Davis	- 23
Aaron D'Souza	- 22
Naresh Sonpar	- 38 ★
Luis Tilleria	- 0
Shailendra Umradia	- 28

7(J) One Member to the **Gresham Committee (City Side)**

		Votes			
		First Round	Second Round	Third Round	Final Round
Brendan Barns	-	11	12	-	-
Sophie Fernandes	-	17	20	20	-
Deputy Madush Gupta	-	10	-	-	-
Deputy Henry Pollard	-	22	24	26	32
Deputy Nighat Qureishi ★	-	34	34	39	40

With no candidate obtaining 50% of the first preference votes, the candidate with fewest first preference votes was eliminated and next preference votes (as appropriate and where indicated) were transferred. This step was repeated and, following the fourth round of counting, Deputy Nighat Qureishi received a majority of votes cast.

For Information

16 **Docquets for the Hospital Seal.**17 **Awards and Prizes****MOTION**18 **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, or are otherwise exempt from publication as they relate to functions of the Court of Common Council which are not subject to the provisions of Part VA and Schedule 12A of the Local Government Act 1972.

For Decision

19 **Policy and Resources Committee**

To consider reports of the Policy and Resources Committee, as follows:-

- (A) **Markets Co-location Programme (SMTA Negotiations)** - to consider proposals on negotiations with the Smithfield Market Tenants' Association (SMTA).

For Decision
(Pages 135 - 154)

- (B) **Markets Co-location Programme (Commercial Leases)** – To consider proposals on the granting of leases within Smithfield Commercial Offices.

For Decision
(Pages 155 - 156)

- (C) **Barbican Podium** – To consider proposals on works required for the Barbican Podium.

For Decision
(Pages 157 - 160)

20 **West Ham Park Committee**

To consider proposals relating to the Nursery Site.

For Decision
(Pages 161 - 166)

21 **Property Investment Board**

To note action taken under urgency procedures in relation to the restructure of a headlease for a City Fund property.

For Information
(Pages 167 - 168)

22 **Policy & Resources**

To note action taken under urgency procedures for the Markets Co-Location Programme.

For Information
(Pages 169 - 170)

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KEAVENY, MAYOR

COURT OF COMMON COUNCIL

16th June 2022
MEMBERS PRESENT

ALDERMEN

Alderman Alexander Barr
Sir Charles Edward Beck Bowman
Professor Emma Edhem
Sir Peter Estlin
Sheriff Alison Gowman
Prem Goyal
David Andrew Graves

Timothy Russell Hailes
Robert Picton Seymour Howard
The Rt Hon. The Lord Mayor Vincent Keaveny
Alastair John Naisbitt King DL
Susan Langley
Ian David Luder

Sheriff Nicholas Stephen Leland Lyons
Professor Michael Raymond Mainelli
Broniek Masojada
Sir Andrew Charles Parmley
Sir William Anthony Bowater Russell
Sir Alan Colin Drake Yarrow

COMMONERS

George Christopher Abrahams
John David Absalom, Deputy
Munsur Ali
Rehana Banu Ameer, Deputy
Randall Keith Anderson, Deputy
Shahnan Bakth
Jamel Banda
Brendan Barns
Alexander Robertson Martin Barr (Alderman)
Matthew Bell
Nicholas Michael Bensted-Smith
Ian Bishop-Laggett
Christopher Paul Boden, Deputy
Mark Bostock, Deputy
Keith David Forbes Bottomley, Deputy
Tijs Broeke
James Bromiley-Davis
Henry Nicholas Almroth
Colthurst, Deputy

Anne Corbett
Aaron Anthony Jose Hasan
D'Souza
Graeme Doshi-Smith, Deputy
Peter Gerard Dunphy, Deputy
Mary Durcan
John Ernest Edwards
Helen Lesley Fentimen
Anthony David Fitzpatrick
John William Fletcher, Deputy
John Foley
Marianne Bernadette Fredericks, Deputy
Steve Goodman
Martha Grekos
John Griffiths
Jason Groves
Madush Gupta, Deputy
Caroline Wilma Haines
Christopher Michael Hayward, Deputy

Jaspreet Hodgson
Ann Holmes, Deputy
Wendy Hyde
Henry Llewellyn Michael Jones
Shravan Jashvantrai Joshi, Deputy
Frances Leach
Tim Levene (Alderman)
Natasha Maria Cabrera Lloyd-Owen
Charles Edward Lord, OBE JP, Deputy
Paul Nicholas Martinelli
Catherine McGuinness
Timothy James McNally
Wendy Mead
Andrien Gereith Dominic Meyers, Deputy
Eamonn James Mullally
Judith Pleasance
Henrika Johanna Sofia Priest
Jason Paul Pritchard

Nighat Qureishi, Deputy
Anett Rideg
David Sales
Ruby Sayed
Ian Christopher Norman Seaton
Dr Giles Robert Evelyn Shilson, Deputy
Alethea Silk
Paul Singh
Sir Michael Snyder, Deputy
Naresh Hari Sonpar
Luis Felipe Tilleria
James Richard Tumbridge
William Upton QC
Mark Raymond Peter Henry
Delano Wheatley
Ceri Edith Wilkins
Philip Woodhouse, Deputy
Dawn Linsey Wright
Irem Yerdelen

Introduction of
New Alderman

On behalf of the Chief Commoner and the Court of Common Council, Wendy Mead welcomed Alexander Barr following his recent election as Alderman for the Ward of Cordwainer. Alderman Barr was heard in reply.

1. Apologies The apologies of those Members unable to attend this meeting of the Court were noted.
2. Declarations There were no additional declarations.

3. Minutes *Resolved* – That, subject to the inclusion of Deputy Peter Dunphy in the list of those Members recorded as having been in attendance, the Minutes of the last Court are correctly recorded.
4. Mayoral Engagements The Rt Hon The Lord Mayor reported on his recent visits to Poland and the World Economic Forum at Davos, as well as reflecting on the magnificent Platinum Jubilee celebrations and the recent launch of Progress Together, the new membership body to promote socio-economic diversity in financial services.
5. Policy Statement There was no statement.

6. **CIVIC AFFAIRS SUB (POLICY AND RESOURCES) COMMITTEE**

(Deputy Charles Edward Lord, OBE, JP)

17 May 2022

Applications for Hospitality

(a) Early Evening Reception following a lecture by the Deputy President of the Supreme Court

It was proposed that the City Corporation host a lecture to be given by the Deputy President of the Supreme Court, the Rt Hon Lord Hodge, followed by an early evening reception and a small private dinner on Tuesday 4th October 2022.

The lecture would focus on the contribution of UK courts to commercial life, the City and international commerce, by their upholding of the rule of law. Guests at the reception would include members of the Supreme Court and other UK Courts, the legal profession, Government and legal sector organisations and commercial firms and Members with relevant interests.

Resolved - That hospitality be granted for a lecture, early evening reception and small private dinner and that arrangements be made under the auspices of the Policy and Resources Committee; the costs to be met from City's Cash within approved parameters.

(b) High Sheriffs' Association of England and Wales Early Evening Reception

It was proposed that the City Corporation host an early evening reception in the Grand Hall at the Central Criminal Court for the High Sheriffs' Association of England and Wales in May 2023.

The City Corporation had hosted an annual reception for the High Sheriffs' Association at the Old Bailey since 2018. The reception aimed to further relations between the Sheriffs of the City of London and the Sheriffs of England and Wales.

Resolved - That hospitality be granted for an early evening reception and that arrangements be made under the auspices of the Policy and Resources Committee; the costs to be met from City's Cash within approved parameters.

(c) Commonwealth High Commissioners' Banquet

It was proposed that the City Corporation host the Commonwealth High Commissioners' Banquet at Guildhall on Monday 5th December 2022.

The City Corporation had hosted an annual dinner for the Commonwealth High Commissioners since 2015. The banquet provided an opportunity to engage further with the Commonwealth and build on the relationships established with the Royal Commonwealth Society and Commonwealth Enterprise Investment Council.

Resolved - That hospitality be granted and that arrangements be made under the auspices of the Policy and Resources Committee; the costs to be met from City's Cash within approved parameters.

7. Appointments

The Court proceeded to consider the following appointments:

Where appropriate:-

** denotes a Member standing for re-appointment*

- (A) Four Members on the **Hampstead Heath, Highgate Wood & Queen's Park Committee**, for the balance of varying terms.

Nominations received:-

Deputy John Absalom
Jason Groves
Deputy Madush Gupta
Wendy Mead

Read.

Whereupon the Lord Mayor declared Deputy John Absalom, Jason Groves, Deputy Madush Gupta, and Wendy Mead to be appointed to the Hampstead Heath, Highgate Wood & Queen's Park Committee.

- (B) One Member on the **Port Health & Environmental Services Committee**, for the balance of a term expiring April 2023.

Nominations received:-

Henrika Priest

Read.

Whereupon the Lord Mayor declared Henrika Priest to be appointed to the Port Health & Environmental Services Committee.

- (C) Two Members on the **Community & Children's Services Committee**, for the balance of terms expiring April 2023.

Nominations received:-

Frances Leach
Natasha Lloyd-Owen

Read.

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

- (D) Two Members on the **Health & Social Care Scrutiny Committee**, for the balance of varying terms.

Nominations received:-

Alderman Christopher Makin

Read.

Whereupon the Lord Mayor declared Alderman Christopher Makin to be appointed to the Health & Social Care Scrutiny Committee.

- (E) Two Members on the **Pension Committee**, for terms expiring April 2024.

Nominations received:-

Deputy Madush Gupta

Deputy Andrien Meyers

Read.

Whereupon the Lord Mayor declared Deputy Madush Gupta and Deputy Andrien Meyers to be appointed to the Pension Committee.

- (F) One Member on the **Epping Forest & Commons Committee**, for the balance of a term expiring April 2025.

Nominations received:-

Ian Bishop-Laggett

Deputy Madush Gupta

Read.

Whereupon the Lord Mayor declared Ian Bishop-Laggett and Deputy Madush Gupta to be appointed to the Epping Forest & Commons Committee.

- (G) One Member on the **Board of Governors of the City of London School**, for the balance of a term expiring July 2025.

Nominations received:-

Shahnan Bakth

Luis Tilleria

Read.

- (H) One Member on the **Board of Governors of the City of London School for Girls**, for the balance of a term expiring July 2023.

Nominations received:-

Martha Grekos
Jaspreet Hodgson
Anett Rideg

Read.

- (I) One Member on the **Education Board**, for the balance of a term expiring April 2024.

Nominations received:-

Steve Goodman
Deputy Madush Gupta

Read.

- (J) Two Members on the **Audit & Risk Management Committee**, for the balance of a term expiring April 2025.

Nominations received:-

*Alderman Alexander Barr
James Bromiley-Davis
Aaron D'Souza
Naresh Sonpar
Luis Tilleria
Shailendra Umradia

Read.

- (K) One Member on the **Gresham Committee (City Side)**, for the balance of a term expiring April 2025.

Nominations received:-

Brendan Barns
Sophie Fernandes
Deputy Madush Gupta
Deputy Henry Pollard
Deputy Nighat Qureishi

Read.

- (L) Five Members on **Christ's Hospital**, for the balance of varying terms.

Nominations received:-

John Foley
Jaspreet Hodgson
Alpa Raja

Read.

Whereupon the Lord Mayor declared John Foley, Jaspreet Hodgson, and Alpa

Raja to be appointed to Christ's Hospital.

- (M) One Member on **Mitchell City of London Charity & Educational Foundation**, for the balance of a term expiring March 2023.

Nominations received:-

Deputy Susan Pearson

Read.

Whereupon the Lord Mayor declared Deputy Susan Pearson to be appointed to the Mitchell City of London Charity & Educational Foundation.

- (N) Two Members on **City of London Archaeological Trust**, for terms expiring May 2026.

Nominations received:-

Deputy Peter Dunphy

Alderman and Sheriff Alison Gowman

Read.

Whereupon the Lord Mayor declared Deputy Peter Dunphy and Alderman & Sheriff Alison Gowman to be appointed to the City of London Archaeological Trust.

The Court proceeded, in accordance with Standing Order No.10, to ballot on each of the foregoing contested vacancies.

The Lord Mayor appointed the Chief Commoner and the Chairman of the Finance Committee, or their representatives, to be the scrutineers of the ballots.

Resolved – That the votes be counted at the conclusion of the Court and the results printed in the Summons for the next meeting.

8. 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:-

Ashid Ali

Ann-Marie Jefferys

Anne Elizabeth Holden

an Academy Principal

Citizen and Glover

Citizen and Basketmaker

Ilford, Redbridge

**Michael James Bracken,
MBE**

Ivor Macklin

Peter Rupert David Wood

a Wine Company Director

Citizen and Painter Stainer

Citizen and Feltmaker

Kemble, Gloucestershire

Sir Andrew John Cash, Kt, OBE, KStJ <i>Robert James Ingham Clark</i> <i>John Petrie</i>	an Eye Hospital Group Chairman <i>Citizen and Clothworker</i> <i>Citizen and Draper</i>	Doncaster, South Yorkshire
Katharine Fiona Richfield Chadd <i>Louise Starling</i> <i>Sarah Jane Fletcher Harris</i>	an Education Officer <i>Citizen and Educator</i> <i>Citizen and Basketmaker</i>	Bethnal Green
David William Chenery <i>Ald. Timothy Russell Hailes, JP.</i> <i>Christopher Bell</i>	a Police Staff Investigator <i>Citizen and Pewterer</i> <i>Citizen and Playing Card Maker</i>	Southwark
Caroline Anne Cooke <i>Richard George Turk</i> <i>Anna Marie Phelps, CBE OLY</i>	a Civil Servant <i>Citizen and Shipwright</i> <i>Citizen and Goldsmith</i>	Surbiton, Surrey
David Cyril Coombes <i>Peter Leonard Spalding</i> <i>Anthony Sharp</i>	an Electrician, retired <i>Citizen and Loriner</i> <i>Citizen and Loriner</i>	Ashtead, Surrey
Richard Corrigan <i>The Rt. Hon The Lord Mayor</i> <i>Amanda Josephine Keaveny</i>	a Chef <i>Citizen and Fletcher</i>	Haringey
Tara Marie Cronin <i>The Rt. Hon The Lord Mayor</i> <i>Amanda Josephine Keaveny</i>	a Fundraising Events Manager <i>Citizen and Fletcher</i>	Kensington
Andrew David Darwin <i>The Rt. Hon The Lord Mayor</i> <i>Amanda Josephine Keaveny</i>	a Solicitor <i>Citizen and Fletcher</i>	Southwark
Oliver Jo Davies <i>Timothy Levene</i> <i>Adam James Crockatt</i>	a Teacher <i>Citizen and Carman</i> <i>Citizen and Dyer</i>	Hayward's Heath, West Sussex
Neil Peter Dunn <i>Les Chapman</i> <i>Richard Leslie Springford</i>	a Marine Pilot <i>Citizen and Master Mariner</i> <i>Citizen and Carman</i>	Gosport, Hampshire
Vladimir Petev Georgiev <i>Ann-Marie Jefferys</i> <i>Anne Elizabeth Holden</i>	a Financial Engineer and Consultant <i>Citizen and Glover</i> <i>Citizen and Basketmaker</i>	Isle of Dogs, Tower Hamlets
Nigel Graham Heath, KStJ <i>Robert James Ingham Clark</i> <i>John Petrie</i>	a Prior <i>Citizen and Clothworker</i> <i>Citizen and Draper</i>	Ross, California, United States of America
Ronan Malachy Herity <i>Vincent Dignam</i> <i>John Paul Tobin</i>	a Machinery Company Director <i>Citizen and Carman</i> <i>Citizen and Carman</i>	Lyne, Surrey

Kevin Gareth Hill <i>David James Sales, CC</i> <i>Shailendra Umradia</i>	an Aircraft Technical Director <i>Citizen and Insurer</i> <i>Citizen and Information</i> <i>Technologist</i>	Rochford, Essex
Jonathan Lewis Hooley <i>Mark John Herbage</i> <i>James Nicholas Bromiley-Davis</i>	a Soldier <i>Citizen and Cook</i> <i>Citizen and Gardener</i>	Littleborough, Lancashire
Anamul Hoque <i>Ald. Sir David Wootton, Kt.</i> <i>Brian David Francis Mooney,</i> <i>Deputy</i>	a Youth Work Training and Development Consultant <i>Citizen and Fletcher</i> <i>Citizen and Common Councillor</i>	Stepney
Mohammed Iqbal <i>Sir David Wootton, Kt., Ald.</i> <i>Brian David Francis Mooney,</i> <i>Deputy</i>	a Trainee Solicitor <i>Citizen and Fletcher</i> <i>Citizen and Common Councillor</i>	Bow
Shirazul Islam <i>Sir David Wootton, Kt., Ald.</i> <i>Brian David Francis Mooney,</i> <i>Deputy</i>	an NHS Commissioning Support Officer <i>Citizen and Fletcher</i> <i>Citizen and Common Councillor</i>	Bow, Tower Hamlets
Simon Andrew Peter Jones <i>Graeme Martyn Doshi-Smith,</i> <i>CC</i> <i>Henry James Arthur Smith</i>	a Communications Company Director <i>Citizen and Information</i> <i>Technologist</i> <i>Citizen and Constructor</i>	Limehouse
Agron Krasniqi <i>Daniel Mark Benham</i> <i>Nikolaos Kotrozos</i>	a Racing Company Director <i>Citizen and Feltmaker</i> <i>Citizen and Feltmaker</i>	Fitzrovia
Joséphine Émilie Charlotte Macintosh <i>The Rt. Hon The Lord Mayor</i> <i>Ald. Sir William Anthony</i> <i>Bowater Russell</i>	a Solicitor <i>Citizen and Haberdasher</i>	Pimlico
Thomas Frederick Brian McCormack <i>Donald Henry McGarr</i> <i>Timothy John Macandrews ,</i> <i>TD JP</i>	a Photographic Services Franchisee <i>Citizen and Basketmaker</i> <i>Citizen and Gold & Silver Wyre</i> <i>Drawer</i>	Coulsdon, Surrey
Denise Alicia Mills <i>Timothy Charles Mills</i> <i>John Edward Mills</i>	a Teacher <i>Citizen and Pavior</i>	Teddington, Middlesex
Abul Hyat Nurujjaman <i>Ann-Marie Jefferys</i> <i>Anne Elizabeth Holden</i>	an Accountancy Company Director <i>Citizen and Glover</i> <i>Citizen and Basketmaker</i>	Chigwell, Essex

Caroline Valerie Pidgeon, MBE <i>Catherine Sidony McGuinness, CC</i> <i>Christopher Michael Hayward, Deputy</i>	a London Assembly Member <i>Citizen and Solicitor</i> <i>Citizen and Pattenmaker</i>	East Dulwich
Eamon Thomas Quail <i>John Edmund Maccabe</i> <i>Catherina Anastasia Leonia Maccabe</i>	a Financial Account Director <i>Citizen and Horner</i> <i>Citizen and Farrier</i>	Gresford, Wrexham
Hayden Luke Ralph <i>Richard Gary Stephen Miller</i> <i>Norman Edward Chapman</i>	a Key Account Manager <i>Citizen and Glover</i> <i>Citizen and Glover</i>	Regents Park
Pranav Kumar Sood <i>The Rt. Hon The Lord Mayor</i> <i>Ald. Sir William Anthony Bowater Russell</i>	a General Manager <i>Citizen and Haberdasher</i>	Islington
Jonathan Stewart <i>Annmarie Hanlon</i> <i>Mark Timothy John Sismey Durrant</i>	a Chief Marketing Officer <i>Citizen and Marketor</i> <i>Citizen and International Banker</i>	Silsoe, Bedfordshire
James Malcolm Swallow <i>Reginald Beer</i> <i>Donald Howard Coombe, MBE</i>	a Chartered Accountant <i>Citizen and Poulter</i> <i>Citizen and Poulter</i>	South Woodford
Jace Tyrrell <i>Shravan Joshi, Deputy</i> <i>Alastair Michael Moss, Deputy</i>	a Business Partnership Company C.E.O. <i>Citizen and Fueller</i> <i>Citizen and Goldsmith</i>	Ealing
Charles Veale <i>John Welch</i> <i>Robert Andrews</i>	an Army Officer <i>Citizen and Pattenmaker</i> <i>Citizen and Gold & Silver Wyre Drawer</i>	Georgetown, Ontario, Canada
Christopher William Tveitan Von Eckhoff <i>Daniel Mark Benham</i> <i>Nikolaos Kotrozos</i>	a Consultant <i>Citizen and Feltmaker</i> <i>Citizen and Feltmaker</i>	Westminster
Dale Glynne Williams <i>Andrew Francis Phillips</i> <i>Daniel Mark Heath</i>	a Banker <i>Citizen and Firefighter</i> <i>Citizen and Hackney Carriage Driver</i>	Saffron Walden, Essex
His Excellency Mr Jean Alfred Olinger <i>The Rt. Hon The Lord Mayor</i> <i>Catherine Sidony McGuinness, CC</i>	a Diplomat <i>Citizen and Solicitor</i>	Belgravia, London

Read.

Resolved – That this Court doth hereby assent to the admission of the said persons, as amended, 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.

9. 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:-

Bills

Date in force

Police, Crime, Sentencing and Courts Act 2022

28 April 2022

The Act makes provision for the protection and wellbeing of police and other emergency workers and grants the police further powers to address crime and disorder. The Act encountered controversy directed at its public order provisions, which strengthen police powers to restrict public processions and assemblies. The Act also includes provision repealing the Vagrancy Act 1824, which made rough sleeping and begging criminal offences in England and Wales. This repeal will not come into force for up to 18 months, during which time the Government plan to have replacement legislation passed.

Subsidy Control Act 2022

28 April 2022

The Act implements a domestic subsidy control regime in the United Kingdom, in place of EU state aid rules to which the UK is no longer subject. The Act provides a legal framework within which public authorities may make subsidy decisions, setting out the principles, prohibitions and requirements that apply to the giving of subsidies, as well as the transparency requirements of the new regime.

Statutory Instruments

The Police, Crime, Sentencing and Courts Act 2022 (Commencement No. 1 and Transitional Provision) Regulations 2022 No.520

12 May 2022

These are the first commencement regulations made under the Police, Crime, Sentencing and Courts Act 2022. They bring into force provisions which increase the maximum penalty for the offence of wilful obstruction of a highway to 51 weeks' imprisonment, via amendments to the Highways Act 1980. This increase will only apply to offences committed on or after 12th May 2022. The Regulations provide for the vast majority of the Act's provisions, including the public order provisions, to come into force on 28th June 2022.

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

Read.

10. Ballot
Results

The Town Clerk reported the results of ballots taken at the last Court, as follows:-

Where appropriate:-

** denotes a Member standing for re-appointment;*

★ denotes appointed.

1 One Member to the **Policy and Resources Committee.**

	Votes
Natasha Lloyd-Owen	- 33
Deputy James Thomson	- 63 ★

2 Three Members on the **Culture, Heritage and Libraries Committee.**

	Votes
Brendan Barns	- 46 ★
Matthew Bell	- 73 ★
Elizabeth King	- 38
Eamonn Mullally	- 62 ★

3 Four Members on the **Civic Affairs Sub (Policy and Resources) Committee.**

	Votes
Emily Benn	- 66 ★
Nicholas Bensted-Smith	- 39
James Bromiley-Davis	- 46 ★
Sophie Fernandes	- 49 ★
Ian Seaton	- 33
Deputy Giles Shilson	- 44 ★
James Tumbridge	- 30

4 Two Members on the **Capital Buildings (Policy and Resources) Board.**

	Votes
Martha Grekos	- 73 ★
Judith Pleasance	- 22
Oliver Sells	- 35 ★
Ian Seaton	- 19
Deputy Philip Woodhouse	- 29

5 One Member on the **City of London Reserve Forces and Cadets Association.**

	Votes
Emily Benn	- 55 ★

Alpa Raja

- 42

6 One Member on the **Board of Governors of the Museum of London.**

		Votes					
		First Round	Second Round	Third Round	Fourth Round	Fifth Round	Final Round
Graeme Doshi-Smith	-	6	-	-	-	-	-
Alderman Gregory Jones ★	-	28	30	32	34	40	45
Deputy Ann Holmes	-	21	21	21	22	27	29
Wendy Mead	-	7	8	-	-	-	-
Alpa Raja	-	11	11	11	-	-	-
Anett Rideg	-	16	16	17	18	19	-
Deputy Giles Shilson	-	8	9	12	15	-	-

With no candidate obtaining 50% of the first preference votes, the candidate with fewest first preference votes was eliminated and next preference votes (as appropriate and where indicated) were transferred. This step was repeated and, following the sixth round of counting, Alderman Gregory Jones received a majority of votes cast.

7 Two Members on **The Honourable The Irish Society.**

	Votes
Anne Corbett	- 35 ★
Jaspreet Hodgson	- 18
Tim McNally	- 33
Eamonn Mullally	- 35 ★
Alpa Raja	- 20
James Tumbridge	- 27

Read.

11. Questions

Meyers, A.G.D.,
Deputy to the
Chairman of
Planning &
Transportation

Community Infrastructure Levy (CIL)

Deputy Andrien Meyers asked a question of the Chairman of the Planning and Transportation Committee, concerning the governance and utilisation of Community Infrastructure Levy (CIL) funds.

Responding, the Chairman explained the obligations around s106 planning obligations and that, separate to this, the CIL is a levy charged on most new development and is intended to fund the provision of infrastructure to support the development of the City's area. There is much greater freedom in legislation on how the City Corporation can spend CIL receipts.

The City Corporation is required to publish an annual report setting out how much CIL and s106 it has received and how this has been spent or will be spent. This report, known as the Infrastructure Funding Statement (IFS).

The City of London CIL came into effect on 1 July 2014 and requires developers to contribute to infrastructure funding in accordance with the City's CIL Charging Schedule. Contributions are calculated on the amount of new floorspace that is delivered, with contribution rates varying between land uses. The responsibility for setting CIL charge rates, and ultimately the amount of CIL a developer is required to contribute, rests with the Planning & Transportation Committee.

However, governance of how the City Corporation spends CIL receipts is the responsibility of Policy & Resources Committee, consistent with its wider resources remit.

The Mayor of London also charges a London-wide CIL, which is collected by the City Corporation on behalf of the Mayor and is used to help fund Crossrail and other strategic transport infrastructure.

City CIL expenditure has to have regard to national legislation which requires 15% of CIL funds to be used to meet local community infrastructure priorities. The City Corporation has established a CIL Neighbourhood Fund, which is administered by the Central Grants Unit and provides generally small-scale grants to local communities across the City. National legislation also allows up to 5% of CIL receipts to be used to fund administration of the CIL process.

For the bulk of City CIL funds, 80% of receipts, the decision on expenditure is the responsibility of the Resource Allocation Sub-Committee. Since the end of 2019, CIL funding decisions have been aligned to the annual capital bids process, which allows for greater alignment of CIL expenditure with corporate capital priorities.

With increasing pressure on service budgets and a substantial reduction in Transport for London funding for transportation and public realm schemes, the Chairman felt it was an opportune time to review the governance around CIL expenditure to ensure that the City Corporation made the most efficient and effective use of limited funds, whilst delivering infrastructure to support the development of the City's area and that communities need.

The Chairman committed to tasking officers to prepare a report for consideration, initially by the Planning & Transportation Committee, addressing how the City Corporation collects and uses developer contributions and looking at what changes need to be made to deliver the high-quality infrastructure and public realm.

Policy and Resources Committee

Paul Singh asked a question of the Chairman of the Policy and Resources Committee, concerning the composition of that Committee, in particular with reference to the opportunities for new Members to participate in that body's activities.

Responding, the Chairman reiterated his previous statements in respect of his desire for newly-elected Members to participate in the Court's business. He clarified that the responsibility for appointments rested with the Court, not the Committee.

Singh, P. to the
Chairman of
Policy &
Resources

The Committee's composition included reserved places for Members with under five years' service and residential Members. Multiple vacancies arise each year, in rotation, to give opportunity for turnover through elections open to all Members.

The Chairman reflected that all Members were equal, largely independent, representatives of the City and stated the need to work together collectively and collegiately. The Policy and Resources Committee has a broad remit as granted by Court, in which ultimate power resides. It had a number of sub-committees which, in turn, had co-opted positions open to all Members.

Paul Singh asked a supplementary question about whether the Chairman should be elected by the Court.

Replying, the Chairman clarified that the Policy Chairman had no decision-making powers as an individual, with all decisions resting with the Committee. This was the case for all of the Court's Committees, where the Chairman's role is to lead, and help implement collective decisions. He felt that if the position was appointed by the Court, it would go against the delegations that are presently operating, and consequently disagreed that the Chairman of Policy should be elected by the Court.

Alderman Ian Luder highlighted a number of examples where newer Members were elected on to key committees, including Policy and Resources Committee. There were also a number of instances where new Members had been appointed into leadership positions, in short order. Alderman Ian Luder re-iterated the point that the Sub-Committees were a useful way to widen involvement.

Chairman thanked the Alderman for the reminder and agreed that it was useful to note that there had been a number of Members elected onto Policy and Resources Committee in their first term, and reflected that the current Vice-Chairmen had only served five years on the Committee. The Chairman agreed that the work of the Sub-Committees was important and that the vacancies open to election from Court was great way to get involved and raise individual profiles.

The Chairman concluded that, if interested, he would welcome any Member to attend Policy and Resources Committee, as is their right as an elected Member.

Munsur Ali, a Member of Policy and Resources Committee, remarked on his own first term, outlining the progress made on significant pieces of work, including visibility and representation on Court. Members were able to contribute through the Member Diversity Working Party, which addressed matters of equalities, diversity and inclusion. Much had been achieved, although there was still more to be done. He encouraged Members of Court to bring forward ideas, regardless of their committee membership.

The Chairman agreed. He suggested the Court had come a long way in improving diversity, but not far enough. He wished to continue to build on the success to date.

Natasha Lloyd-Owen explained that at the heart of Lisvane, he highlighted issues with appointments particularly with Policy and Resources Committee. She found it interesting that a new Member had these views. Concern was expressed on the

limitations on participation at Policy and Resources Committee for those not elected to it, particularly Members representing residential wards. With that in mind, Natasha Lloyd-Owen asked if there was plans to bring forward proposals to allow for substitute Members on Committees.

The Chairman of Policy and Resources confirmed that the Court deliberated on the proposal for a nominating body of Court, with many taking the view that the process would be even less democratic. With a lot of power falling to a decided few. It was therefore rejected on the basis that everyone should have a say on who is on what Committee. The Chairman confirmed that he would be open to considering requests from observing Members of Policy and Resources, who wished to speak on a particular items with a very strong case.

Platinum Jubilee Celebrations

P.J., Deputy to the
Chairman of
Policy &
Resources

Deputy Philip Woodhouse asked a question of the Chairman of the Policy and Resources Committee regarding the work undertaken by City of London Corporation officers, in the delivery of a programme of successful Platinum Jubilee events.

In reply, the Chairman was delighted to wholeheartedly agree, without reservation.

Members had the privilege of participating in some of the unique and remarkable events commemorating Her Majesty's Platinum Jubilee across the Bank Holiday weekend, however, across the whole City Corporation, a wide range of festivities were also held in honour of our Sovereign's long and dedicated service.

The momentous occasion required a significant effort from our officers. The Chairman invited the Honourable Court to join him in demonstrating its formal appreciation.

The Chairman also thanked fellow Members for their involvement, particularly those on the Civic Affairs Sub-Committee, who contributed considerably in preparation.

Appreciation was also expressed to Livery Companies who supported events both financially and by their enthusiastic participation.

In conclusion a deep gratitude was expressed to Her Majesty the Queen, for all she has done for the City, the nation, and the Commonwealth over the past 70 years.

Wendy Mead asked whether thanks could be demonstrated to staff with some commemorative gift. The Chairman agreed to explore possible options.

12. Motions

There were no Motions.

13. **AUDIT & RISK MANAGEMENT COMMITTEE****(Alexander Robertson Martin Barr)**

24 May 2022

Annual Report

The Audit and Risk Management Committee presented to the Court of Common Council its 2021/22 Annual Report, updating on its activity from 1 April 2021 to 31 March 2022. Providing this report to the Court of Common Council on an annual basis was in line with Chartered Institute of Public Finance & Accounting (CIPFA) guidance on best practice for audit committees in order to effectively support the organisation; for the Court to understand the work of the Committee; and, for the Court to hold the Committee to account.

Resolved – That the report be received.

14. **POLICY & RESOURCES COMMITTEE****(Deputy Christopher Michael Hayward)**

13 May 2022

Report of Urgent Action Taken: Corrections to Constitutions and Terms of Reference, Board of Governors of the City of London School and City of London Freeman's School

The Court noted action taken under urgency procedures to implement a number of corrections to the Terms of Reference of the Board of Governors of the City of London School and Board of Governors of the City of London Freeman's School.

Due to an administrative error, when the two Schools' Terms of Reference had been presented to the Court as part of the White Paper in April 2022, the outdated versions for the City of London School and City of London Freeman's School were left in situ and not replaced with new versions which corresponded with the previous decisions of the Court. (The correct version was, however, included in respect of the City of London School for Girls). Specifically, these changes were: the introduction of term limits of 12 years for Governors, a greater term length for Chairs (subject to annual re-election in the usual way), and a reflection of the Chair's additional responsibilities under the Target Operating Model's arrangements for the management of institutions.

The error having been identified, approval was granted under urgency for this to be corrected and the omitted changes incorporated, together with a consequential reflection of the changes to the Chairs' term limits under Standing Order 29.

Resolved – That the action taken be noted.

15. Resolutions There were no resolutions.

16. Hospital Seal There were no docquets for the Seal.

17. Awards & Prizes There was no report.

18. Exclusion of Public That the public be excluded from the meeting for the following item of business below on the grounds that it both involves the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act, 1972, and also relates to functions of the Court of Common Council which are not subject to the provisions of Part VA and Schedule 12A of the Local Government Act 1972.
- Duckworth, S.D.,
O.B.E., D.L.,
Deputy; Colthurst,
H.N.A., Deputy*
19. Non-public minutes *Resolved* – That the non-public minutes of the last Court are correctly recorded.

The meeting commenced at 1.00 pm and ended at 1.52 pm

BARRADELL.

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Report – Licensing Committee

Gambling Act 2005: Review of Statement of Licensing Principles

To be presented on Thursday, 21st July 2022

*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. A revised policy is due for renewal in 2022.

The City Corporation attaches, as part of the policy, the work it completed in 2017/18 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 local area profile has not been updated for the 2022 policy to permit businesses a 'settling' in period following the various COVID-19 restrictions and easings over the past two years, which has disrupted the trade. A review will be taking place with an aim for an updated area profile in 2024 which will inform future policy.

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 (Appendix 1), The Gambling Local Area Profile (Appendix 2) and the Guidance on Undertaking Local Gambling Risk Assessments (Appendix 3) as the Corporation's 'Statement of Licensing Principles'

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. The current policy is due for renewal this year and it is therefore necessary for the Corporation to prepare the publication of its policy to run for a further three years.
3. In order to comply with the statutory process, the City Corporation must consult 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
4. The Gambling Commission has produced a 'Guidance to Licensing Authorities - updated May 2021 (the 'Guidance') and a document entitled 'Licence Conditions and Codes of Practice' – updated October 2020 (LCCP).
5. 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.
6. The 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.
7. 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.
8. 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.
9. The Gambling industry as controlled by the Gambling Act 2005 has a relatively light impact on the City of London. The City of London is not permitted to have a casino and has no Adult Gaming Centres.

Premises licensed within the City are currently as follows:

- | | |
|--------------------------------------|----|
| • Betting Shops | 15 |
| • Gaming Machine Permits (2 or less) | 95 |
| • Gaming Machine Permits (3 or more) | 12 |
| • Bingo Establishments | 1 |

Current Position

10. The Licensing Service undertook 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

11. The above documents can be seen as Appendix 2 and Appendix 3 respectively. The new Policy can be seen as Appendix 1. The new policy is almost identical to the previous policy with minor changes to reflect the statutory position and the various consultees.

New 'Policy'

12. The draft documents at Appendices 1,2 and 3 form the basis of the paper that was forwarded to consultees; the consultation period ran from Friday, 21 January 2022 to Friday, 15 April 2022. No representations or comments were received during this time.

13. The following persons were consulted, representing the interests of persons carrying on businesses in the City of London:

- Representatives of the licensed premises namely, Ladbrokes, William Hill, Coral and Betfred.

14. The following persons were consulted, representing the interests of persons who may be affected by the City exercising its functions under the Act:

- Members of the Licensing Committee
- Director of Community and Children's Services
- GambleAware
- Gamcare
- Gambling Commission
- Betting and Gaming Council
- Bingo Association
- National Association of Bookmakers
- City of London Residents' Associations
- Members of the LLP
- Other responsible authorities

15. In addition, the relevant documents were available to view throughout the consultation period on the Licensing Teams internet pages.
16. The remaining statutory consultee, The Chief Officer of Police for the City of London, was also consulted.

Conclusion

17. 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 2022
- 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 23rd day of May 2022.

SIGNED on behalf of the Committee.

James Tumbridge
Chairman, Licensing Committee



CITY OF LONDON CORPORATION

GAMBLING ACT 2005

STATEMENT OF LICENSING
PRINCIPLES

May 2022

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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, pre COVID, over 450,000 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
 - Gambling Commissions
 - Representatives of the Trade:

- Ladbrokes
- William Hill
- Coral
- Betfred
- Gamcare
- GambleAware
- Betting and Gaming Council
- National Association of Bookmakers
- Bingo Association
- City Residents Associations
- Director of Community and Children's Services
- Members of the Licensing Committee
- Members of the Licensing Liaison Panel
 - Highways
 - Environmental Health
 - Planning
 - Community Safety
 - Immigration Services
 - Street Enforcement
 - Public Health
 - Trading Standards
 - London Fire Brigade
- 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 January 2022 to 15 April 2022.

1.6 The policy was approved at a meeting of the Court of Common Council on [TBA] 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.

- 2.2 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.’

- 2.3 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.

3. Declaration

- 3.1 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 October 2020.

3.2 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

4. Responsible Authorities

4.1 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.

4.2 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.

5. Interested Parties

5.1 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).'

5.2 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

5.3 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.

5.4 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.

5.5 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.

5.6 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.

6. Exchange of Information

- 6.1 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.
- 6.2 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.
- 6.3 Should any protocols be established as regards information exchange with other bodies then they will be made available.

7. Enforcement

- 7.1 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.
- 7.2 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.

7.3 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.

7.4 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.

7.5 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.

7.6 The City Corporation will also keep itself informed of developments as regards the work of the Department of Business, Energy and Industrial Strategy in its consideration of the regulatory functions of local authorities.

7.7 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.

8. Licensing Authority Functions

8.1 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

8.2 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

9. General Principles

- 9.1 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.
- 9.2 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.

9.3 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.

9.4 '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.

9.5 The Gambling Commission states in the latest edition of its Guidance to Licensing Authorities (issued May 2021) 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.'

9.6 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.

9.7 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?

9.8 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’

9.9 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.

- 9.10 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.
- 9.11 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.
- 9.12 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

- 9.13 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

- 9.14 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

- 9.15 The Gambling Commission's 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.
- 9.16 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.'
- 9.17 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.
- 9.18 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

- 9.19 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.
- 9.20 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.
- 9.21 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.
- 9.22 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.
- 9.23 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.
- 9.24 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

9.25 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.

9.26 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.

9.27 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.

9.28 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.

9.29 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.

9.30 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

9.31 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.

9.32 Where it is decided that supervision of entrances/machines is appropriate for particular cases, door supervisors are expected to be SIA licensed.

10. Adult Gaming 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 that there will be sufficient measures to, for example, ensure that people under 18 years of age do not have access to the premises.

10.2 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.

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

11. Licensed Family Entertainment Centres

11.1 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.

11.2 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.

11.3 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) (now amalgamated in the Licence Conditions and Codes of Practice (LCCP) published October 2020) 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.¹

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.² 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. Although this profile was developed in 2017 the majority of the points made are still relevant today. It is the view of the Licensing Team that this profile does not have to be repeated at this stage, particularly in light of the uncertainty as to levels of trading, number of licensed premises etc., following Government COVID restrictions and the reduction in footfall within the City of London.
- 25.3. It is expected that a new Local Area Profile be produced prior to the review of the Gambling Act 2005: Review of Statement of Licensing Principles due in 2025.
- 25.4. The City Corporation will expect local risk assessments to contain control measures that seek to mitigate those risks identified in the Local Area Profile.

¹ Guidance on Undertaking Gambling Risk Assessments – January 2018

² Gambling Local Area Profile – April 2017

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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 GeoFutures¹ 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 18-35² years old who are in uncontrolled environments where warnings and control is limited, and often during working hours.

¹ Geofutures Ltd, Bath

² 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.^{3,4}

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.

³ Gambling Commission Licence Conditions Codes and Practice – January 2018

⁴ 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.'⁵

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'.⁶

⁵ Responsible Gambling Strategy Board - 2009

⁶ 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.⁷

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

⁷ 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 18-35⁸ 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.

⁸ 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 10-24years

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 5⁹ of the United Kingdom are now gambling on-line. However, the most alarming statistic is that over 500,000⁹ children are reported to gamble each week. The most predominant demographic however is professional males aged between 18-35 years old¹⁰ 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.¹⁰

Television gambling advertisements have risen 600% from 234,000 in 2007 to 1.4m in 2012.¹¹ 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.

⁹ Gambling Commission – Young People and Gambling 2016

¹⁰ EPIC Risk Management

¹¹ 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.

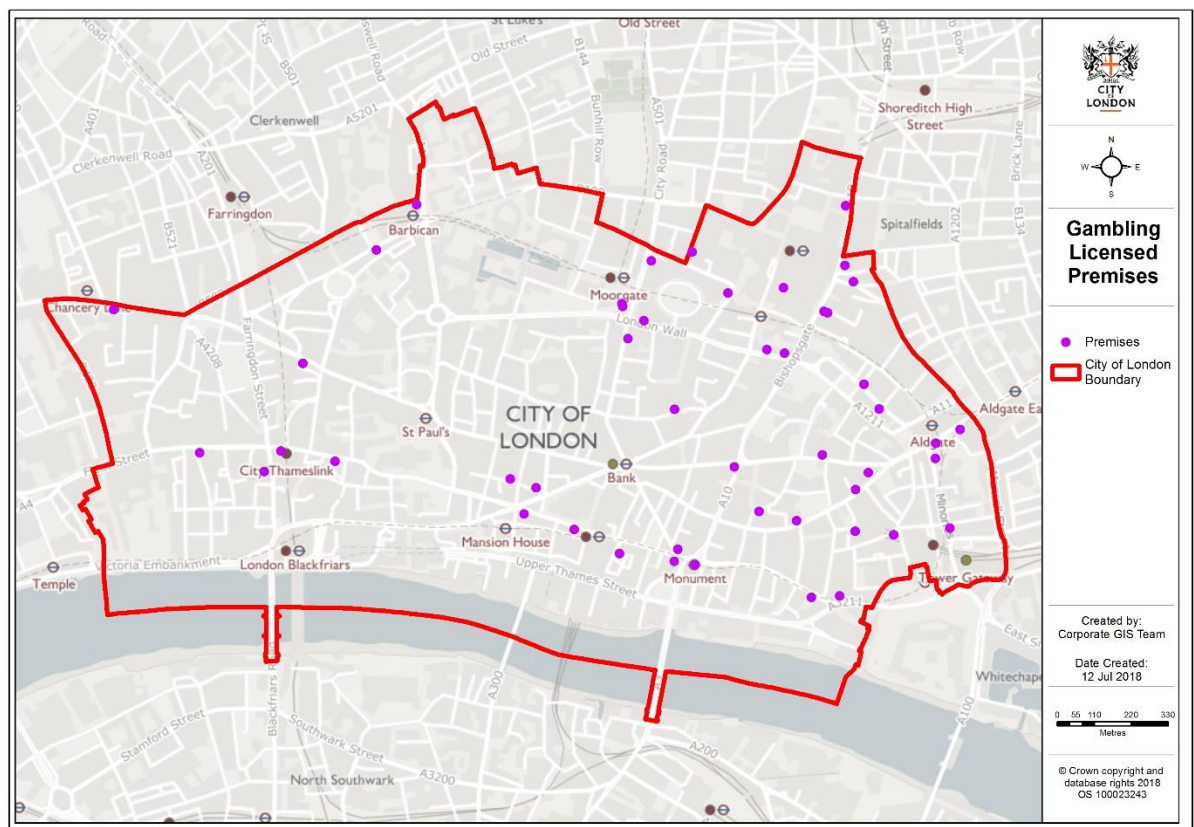
The City of London has a unique demography with a relatively low residential population but an estimated daily working population of approximately 400,000. The City is the only area in the United Kingdom in which the number of workers significantly outnumber the residents.

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 30¹² 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).

¹² 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.

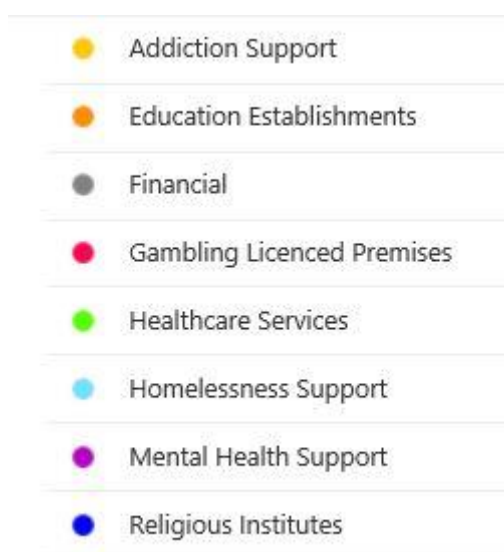
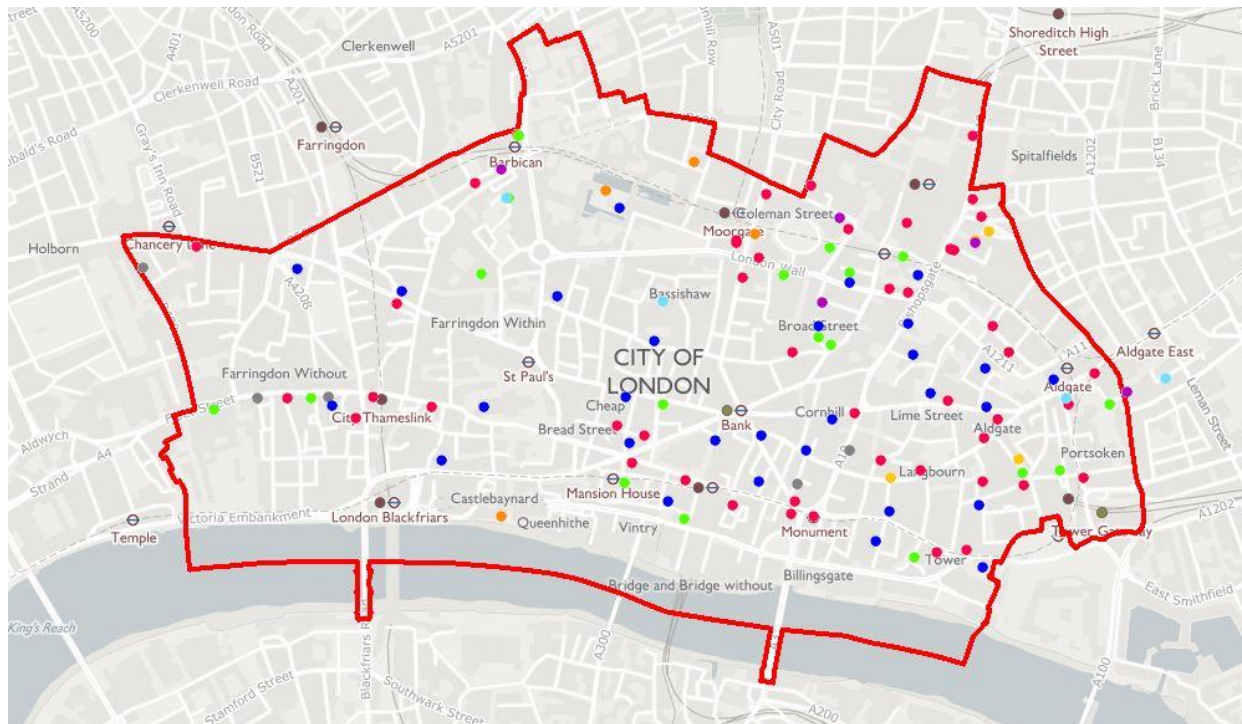
Lighter grey demonstrates emerging evidence, and the remaining characteristics are mixed/limited or no evidence.

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](#).



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 old¹³ who are in uncontrolled environments where warnings and control is limited, and often during work hours.¹³

Advertising is now seen regularly by a younger audience¹⁴, 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.

¹³ EPIC Risk Management

¹⁴ 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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Appendix A	City of London Corporation Local Gambling Risk Assessment Template

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.
- 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.

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



List of Applications for the Freedom

To be presented on Thursday, 21st July, 2022

*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.

Katie Louise Joanne Attwood <i>David Robert Attwood</i> <i>Michael Peter Cawston</i>	a Real Estate Director <i>Citizen and Plumber</i> <i>Citizen and Tyler and Bricklayer</i>	Finchley, London
Ana Bathija <i>Robert Andrews</i> <i>The Right Reverend Robert Todd Giffin, OStJ</i>	a Graphical Engineer <i>Citizen and Gold & Silver Wyre Drawer</i> <i>Citizen and Tobacco Pipe Maker & Tobacco Blender</i>	Toronto, Ontario, Canada
Carol Anne Boswarthack-Slater, MBE <i>Ruby Sayed, CC</i> <i>Wendy Marilyn Hyde, CC</i>	a Chartered Librarian <i>Citizen</i> <i>Citizen and World Trader</i>	Forest Gate, London
Dr Quaye Botchway <i>Howard Andre Beber</i> <i>Kevin George Howard</i>	a Research Consultant and Lecturer <i>Citizen and Poulter</i> <i>Citizen and Loriner</i>	Coventry, West Midlands
Ann Barbara Mitchell Brenells <i>Simon James Goodman</i> <i>John David Edmund Gallagher</i>	an Administrator, retired <i>Citizen and Pattenmaker</i> <i>Citizen and Pewterer</i>	
Paul Brenells <i>Simon James Goodman</i> <i>John David Edmund Gallagher</i>	a Solicitor, retired <i>Citizen and Pattenmaker</i> <i>Citizen and Pewterer</i>	Stoke Newington, London
James Hendry Brown <i>Ann-Marie Jefferys</i> <i>Anne Elizabeth Holden</i>	a Mechanical Engineer, retired <i>Citizen and Glover</i> <i>Citizen and Basketmaker</i>	Morden, Surrey
Kathryn Oteri Campbell <i>The Rt. Hon. The Lord Mayor</i> <i>Ald. Sir William Anthony Bowater Russell</i>	an Architect <i>Citizen and Haberdasher</i>	Upminster, Essex

Dr Anna Cantlay <i>The Rt Hon. The Lord Mayor</i> <i>Ald. Sir William Anthony</i> <i>Bowater Russell</i>	a Medical Practitioner <i>Citizen and Haberdasher</i>	Barnes, London
Andrew Clyde Winston Carter <i>Ruby Sayed, CC</i> <i>Deputy Randall Keith Anderson</i>	a Local Government Officer <i>Citizen and Common Councillor</i> <i>Citizen and Common Councillor</i>	Purley, Croydon
Simon Paul Cribbens <i>Ruby Sayed, CC</i> <i>Deputy Randall Keith Anderson</i>	a Local Government Officer <i>Citizen and Common Councillor</i> <i>Citizen and Common Councillor</i>	Bromley, London
John Paul Curlewis <i>Susan Mary Harrison</i> <i>Basil Roy Hodgson</i>	a Construction Company Director <i>Citizen and Educator</i> <i>Citizen and Stationer & Newspaper</i> <i>Maker</i>	Horsham, West Sussex
Carol Rochelle De Solla <i>Alan Leslie Warman</i> <i>Diane Irene Warman</i>	an Investment Banking Analyst, retired <i>Citizen and Clockmaker</i> <i>Citizen and Clockmaker</i>	Wellingborough, North Northamptonshire
Simon Geoffrey Dodd <i>Stephen Richard Nigel Fenton</i> <i>Lewis Barry Bloch</i>	a Transaction Credit Manager <i>Citizen and Baker</i> <i>Citizen and Basketmaker</i>	Westcliff-on-Sea, Essex
Louis Cornelius Taljaard Du Plessis <i>The Rt Hon. The Lord Mayor</i> <i>Amanda Josephine Keaveny</i>	a Security Manager <i>Citizen and Fletcher</i>	Ilford, Essex
Niâma El Bassunie <i>The Rt. Hon The Lord Mayor</i> <i>Ald. Sir William Anthony</i> <i>Bowater Russell</i>	a Commercial Marketplace Chief Executive Officer <i>Citizen and Haberdasher</i>	Camden, London
Robert Benjamin Erskine-Hill <i>The Rt. Hon The Lord Mayor</i> <i>Ald. Sir William Anthony</i> <i>Bowater Russell</i>	an Executive Search Consultant <i>Citizen and Haberdasher</i>	Putney, Wandsworth
Susan Anne Flather <i>Robert Mainprize Flather</i> <i>David Ian Allan</i>	an Interior Designer <i>Citizen and Stationer & Newspaper</i> <i>Maker</i> <i>Citizen and Stationer & Newspaper</i> <i>Maker</i>	Oakham, Leicestershire
Douglas Howard Ginsburg <i>Deputy Christopher Michael</i> <i>Hayward</i> <i>Matthew Charles Falco</i> <i>Lombardi Richardson</i>	a Chief Judge <i>Citizen and Pattenmaker</i> <i>Citizen and Wax Chandler</i>	Washington DC, United States of America
Peter Walker Grant <i>Ald. Robert Charles Hughes-</i> <i>Penney</i> <i>Deputy James Henry George</i> <i>Pollard</i>	an Investment Portfolio Manager <i>Citizen and Haberdasher</i> <i>Citizen and Skinner</i>	Balham, London

Charles Paul Harvey <i>David Charles Evans</i> <i>Andrew Williams</i>	a Security Company Co-Owner <i>Citizen and Security Professional</i> <i>Citizen and Security Professional</i>	Letchworth Garden City, Hertfordshire
Patrick Hickey <i>The Rt. Hon The Lord Mayor</i> <i>Amanda Josephine Keaveny</i>	a Civil Engineering Company Director <i>Citizen and Fletcher</i>	Woldingham, Surrey
Dean David Horsley <i>Donald Howard Coombe</i> <i>David Peter Coombe</i>	an Operations Manager <i>Citizen and Poulter</i> <i>Citizen and Poulter</i>	Maidstone, Kent
Anthony Hoskins <i>Michael John Smith</i> <i>John Alexander McGregor</i>	an Aviation Engineering Company Director <i>Citizen and Fan Maker</i> <i>Citizen and Spectacle Maker</i>	Storrington, West Sussex
William Benjamin Robert Hulse <i>Iain Reid</i> <i>Edward Gradosielski</i>	a Museum Director, retired <i>Citizen and Ironmonger</i> <i>Citizen and Wax Chandler</i>	Rotherhithe, London
Eve Elizabeth Hurrell Atkins <i>Ann Elizabeth Esslemont</i> <i>Wendy Mead, CC</i>	a Student <i>Citizen and Glover</i> <i>Citizen and Glover</i>	Norwich, Norfolk
Dr Sandra Diane Husbands <i>Mary Durcan, CC</i> <i>Deputy Marianne Bernadette Fredericks</i>	a Public Health Director <i>Citizen and Common Councillor</i> <i>Citizen and Baker</i>	Harlesden, London
Terence John Hussey <i>Vincent Dignam</i> <i>John Paul Tobin</i>	a Mechanical and Electrical Company Director <i>Citizen and Carman</i> <i>Citizen and Carman</i>	Hollingbourne, Kent
Fiona Catherine Kirton <i>Ald. Sir Peter Kenneth Estlin</i> <i>Ian Christopher Norman Seaton,</i> <i>MBE</i>	a Bursaries Officer, retired <i>Citizen and International Banker</i> <i>Citizen and Girdler</i>	Godalming, Surrey
Jessica Ruth Liebmann <i>The Rt. Hon The Lord Mayor</i> <i>Ald. Sir William Anthony</i> <i>Bowater Russell</i>	a Business Development Senior Manager <i>Citizen and Haberdasher</i>	Richmond, Surrey
Dr Hong Lu, OBE <i>Ald. Prof. Michael Raymond</i> <i>Mainelli</i> <i>Elisabeth Mainelli</i>	a Teacher <i>Citizen and World Trader</i> <i>Citizen and Mason</i>	Cambridge, Cambridgeshire
Geraldene Ann Lucia-Hennis <i>Lisa Rutter</i> <i>Ann-Marie Jefferys</i>	a Councillor <i>Citizen and Pattenmaker</i> <i>Citizen and Glover</i>	Dartford, Kent

Andrew Philip Mindenhall <i>Deputy Rehana Banu Ameer</i> <i>Deputy Randall Keith Anderson</i>	an IT Chief Executive Officer <i>Citizen and Common Councillor</i> <i>Citizen and Common Councillor</i>	York, Yorkshire
Haridas Nair <i>Kevin George Howard</i> <i>Richard Keith Skues</i>	a Bank Manager, retired <i>Citizen and Loriner</i> <i>Citizen and Clockmaker</i>	East Croydon, Surrey
Paul James Newton <i>Nikolaos Kotrozos</i> <i>Daniel Mark Benham</i>	a London Underground Area Manager <i>Citizen and Feltmaker</i> <i>Citizen and Feltmaker</i>	Hornchurch, Havering
William Guy Marshall Nicholson <i>Deputy Christopher Michael Hayward</i> <i>Deputy Simon D'Olier</i> <i>Duckworth, OBE DL</i>	a Deputy Mayor <i>Citizen and Pattenmaker</i> <i>Citizen and Skinner</i>	Hackney, London
Caroline Anne O'Donoghue <i>Vincent Dignam</i> <i>John Paul Tobin</i>	a Local Government Officer <i>Citizen and Carman</i> <i>Citizen and Carman</i>	Enfield, London
Eugene Christopher O'Driscoll <i>Deputy Rehana Banu Ameer</i> <i>Deputy Randall Keith Anderson</i>	an IT Service Director <i>Citizen and Common Councillor</i> <i>Citizen and Common Councillor</i>	Stratford-upon-Avon, Warwickshire
Christopher Jefferson Pelham <i>Ruby Sayed, CC</i> <i>Deputy Randall Keith Anderson</i>	a Local Government Officer <i>Citizen and Common Councillor</i> <i>Citizen and Common Councillor</i>	Woodford Green, Essex
Roxanne Lyn Ransley <i>Michael John James</i> <i>James Patrick Vaughan</i>	a Teacher, retired <i>Citizen and Stationer & Newspaper Maker</i> <i>Citizen and Stationer & Newspaper Maker</i>	Tring, Hertfordshire
Mohammad Arshad Sarwar <i>The Rt. Hon The Lord Mayor</i> <i>Amanda Josephine Keaveny</i>	a Security Supervisor <i>Citizen and Fletcher</i>	Lewisham, London
Lyn Schalk <i>Sir Michael Snyder</i> <i>Ald. Alexander Barr</i>	a Cafe and Building Manager <i>Citizen and Needlemaker</i> <i>Citizen and Ironmonger</i>	Canning Town, London
Lemn Sissay, OBE <i>Deputy Christopher Michael Hayward,</i> <i>Wendy Marilyn Hyde, CC</i>	an Author, Poet and Broadcaster <i>Citizen and Pattenmaker</i> <i>Citizen and World Trader</i>	Clapton, London
Iara Spinelly Cruzal <i>Ald. Sir David Hugh Wootton</i> <i>Iain Reid</i>	a Personal Assistant to The Consul General of Brazil <i>Citizen and Fletcher</i> <i>Citizen and Ironmonger</i>	Lewisham, London
Daniel Taylor Rushworth <i>Daniel Mark Benham</i> <i>Nikolaos Kotrozos</i>	a Finance Director <i>Citizen and Feltmaker</i> <i>Citizen and Feltmaker</i>	Wood Green, London

Nina Ann Walker <i>Stephen Paul Tanner</i> <i>Anthony Edward Demby</i>	a Headteacher, retired <i>Citizen and Upholder</i> <i>Citizen and Upholder</i>	Walton On Thames, Surrey
Rev. Dr Martin Wellings <i>Martin Henry Charles Russell</i> <i>Brian John Coleman</i>	a Methodist Minister <i>Citizen and Farrier</i> <i>Citizen and Farrier</i>	Finchley, London
Abiodun Macdonald Williams, JP <i>Ann-Marie Jefferys</i> <i>Alan Shelley</i>	a Health and Safety Officer, retired <i>Citizen and Glover</i> <i>Citizen and Blacksmith</i>	Croxdale, Durham

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Report – City of London Police Authority Board

City of London Police: Annual Report 2021/22

To be presented on Thursday, 21st July 2022

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

SUMMARY

The Annual Report, presenting the achievements of the City of London Police for the past financial year, was approved by the Police Authority Board and is hereby submitted to the Court for information.

The report contains information on crime, financial and staff statistics, as well as a summary of the year.

The report is appended and will also be made available online at the City of London Police's website (www.cityoflondon.police.uk).

RECOMMENDATION

Members are asked to note the report.

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

DATED this 30th day of June 2022.

SIGNED on behalf of the Board.

Deputy James Thomson
Chair, City of London Police Authority Board

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City of London Police

Annual Report 2021/22

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Our priorities

NB:- Please note that a new [Policing Plan for 2022-25](#) has been recently launched but this annual report assesses performance of 2021-22 based on the previous iteration of the [Policing Plan 2020-23](#).

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Economic and Cyber crime

We will protect the public and reduce the harm from fraud by providing national leadership and coordinated services that are valued by policing and meet the needs of victims. We will also lead the policing response to wider economic and cyber-crime threats.



Counter Terrorism

We will continue to work tirelessly with partners in law enforcement and other agencies to protect the Square Mile from this threat and be leaders in the provision of protective security.



Serious organised crime

We will ensure we have the capacity and capability to tackle serious organised crime effectively to protect the Square Mile and the City of London is viewed as a hostile environment for organised crime groups.



Violent and acquisitive crime

Working with the Safer City Partnership and with a focus on crime prevention, we will ensure levels of violent and acquisitive crime remain low in the City of London.



Local policing

Our focus on local policing (which includes roads policing, public order, antisocial behaviour and vulnerability) will ensure the City of London remains a safe, low crime area for all those that live, work or visit here.

Commissioner's Foreword



I am pleased to present this annual report which reviews the progress of the City of London Police between the 1st April 2021 and 31st March 2022.

This continued to be an unusual period as we adapted to the changing face of the COVID-19 pandemic. It was also a period that saw trust and confidence in policing face unprecedented challenge.

The City started to come back to life - a welcome sight - but at the same time people continued to live more of their lives online. These changes have impacted how we police and we have had to adapt and stay responsive to ensure we keep people safe in both the physical and virtual world.

As mentioned above, this has been and will continue to be a very difficult period for policing. Trust, confidence and legitimacy are very much in the spotlight and under the microscope. The murder of Sarah Everard by a serving police officer and other tragic deaths, such as those of Joana Henry and Nicole Smallman, Julia James, Gracie Spinks, Sabina Nessa and Bobbi-Anne McLeod have understandably sent shockwaves across UK policing and impacted upon the trust and confidence felt amongst the public

Our commitment to tackling violence against women and girls (VAWG) and rebuilding trust and confidence is fully reflected in our new Policing Plan and the creation of our Professionalism and Trust business area which will focus on VAWG, Integrity Standards, Equality & inclusion and will be the focus for addressing community concerns, and building internal confidence across the workforce.

We have engaged and listened to our communities, our officers and staff, and have reflected this feedback into our new vision and values. A vision that sees us trusted by communities to deliver policing with professionalism, integrity and compassion.

I am proud to be leading the City of London Police and look forward to working collectively to deliver a modern engaging and professional service for all our communities.

Angela McLaren
Commissioner, City of London Police

Chair's Foreword



The focus of the Police Authority Board over the last year has been on maintaining public safety and low levels of crime in the City, improving the national response to economic and cyber crime, and ensuring diversity and inclusion is embedded in the culture of the City of London Police and Police Authority.

In 2021, Ian Dyson retired as Commissioner of City of London Police having held the post for almost six years with outstanding dedication and commitment. His successor, Commissioner Angela McLaren, was appointed by the Police Authority Board as the first female commissioner in the City Police's 182 year history.

I am pleased to see crime levels overall are lower than pre-Covid levels. With the return of the working population and night time economy, maintaining this trend and responding to community concerns about anti-social behaviour will require continued collaboration across the police, City of London Corporation and other partners on the Safer City Partnership.

City Police has continued to work closely with the Metropolitan Police, British Transport Police, and the intelligence services to prevent terrorist attacks against the City. I was good to see recognition of the effectiveness of this collaboration in Lord Harris' 2022 independent review of London's preparedness to respond to a major terrorist incident.

Last year I joined the Board of the Association of Police and Crime Commissioners and am the Deputy Portfolio Lead for Fraud and Cyber Crime. I have used these roles to support the work of City Police as the national policing lead for economic and cyber crime, highlighting the need for greater scrutiny and prioritisation of these crimes by PCCs. Economic, fraud and cyber crime are now mentioned in all Police and Crime Plans. However, there is still more to be done to ensure disseminations from Action Fraud are appropriately resourced by forces.














Recognising the importance of preventing fraud, the Police Authority worked with City Police (and others in the counter fraud community) to successfully petition for fraud to be named a priority harm and inclusion of advertising in the Online Safety Bill. The formation of the new National Cyber Resilience Centre company in the City has brought together representatives from industry and policing to provide strategic direction and support for regional centres assisting SMEs with their cyber resilience.

The new Commissioner has made clear a core part of her agenda is professionalism and trust. Since I have been Chair, the Police Authority Board established its own diversity policy and has improved representation across its members. Ensuring City of London Police is visibly representative of its communities at all levels of policing remains a priority area of focus, along with supporting work to combat violence against women and girls in the City.

James Thomson
Chair, City of London Police Authority Board

Policing Plan Performance

Every year we agree our policing priorities with our Police Authority Board within our Annual Policing Plan. In 2021/22, the Force set out the following priorities within this document and each of these areas had several performance measures associated with them are monitored by our Police Authority to track our performance:

				
Economic and Cyber crime	Counter Terrorism	Serious organised crime	Violent and acquisitive crime	Local policing
<div><p>Alerted the financial sector to 35,400 bank accounts and compromised credit cards linked to fraud with a value of almost £58m</p></div> <div><p>Informed banking of £54m money at risk and confirmed £2.2m repatriated to victims</p></div>	<div><p>4,548 Project Servator deployments – 56% increase since last year</p></div>	<div><p>Recovered over £29m in assets compared to £5.9m in 2020/21</p></div> <div><p>Compared to last year, there has been a 38% increase in investigations supported or coordinated to safeguard children.</p></div>	<div><p>There continues to be a reduction of victim-based violent crimes of 32% compared to the 2019-20 baseline, although there has been an increase in the rolling 12-month period of 80% in Q4 compared to previous year when lockdown restrictions were tighter.</p></div>	<div><p>378 public protection notices related to children and 758 relating to adults have been submitted, compared to 265 and 493 last year respectively.</p></div> <div><p>Positive outcome rate for stop and search was 35%</p></div>

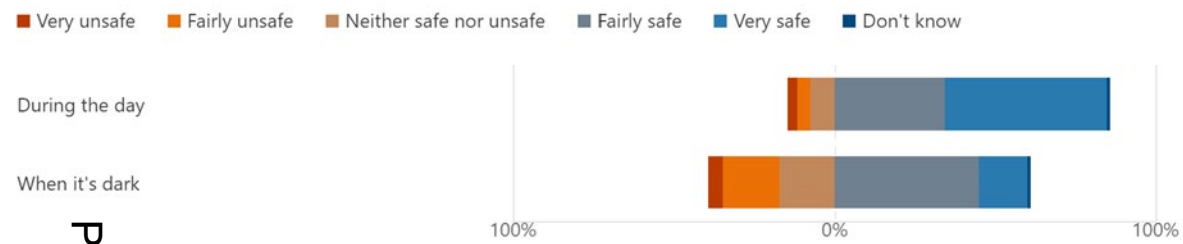
- In addition...
- The number of positive outcomes for 2020/21 was at **21%**
 - **1,287** judicial outcomes recorded by police – **43%** increase on last year
 - We recruited **66** new joiners, **10.6%** were from Black, Asian or Minority Ethnic backgrounds



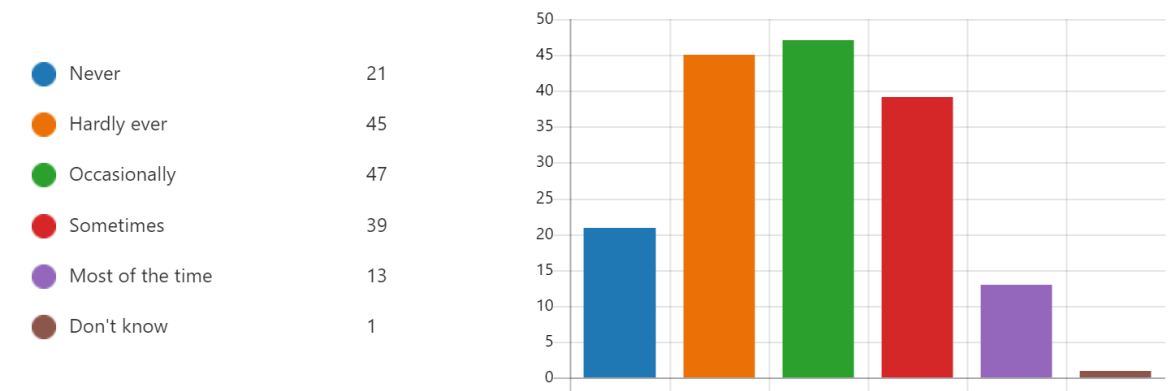
Community Feedback

Each year we undertake a survey of residents, workers and visitors to the City of London to identify public concerns and priorities and how we can address these through the delivery of our Policing Plan. The results of this year's survey were used to inform discussions with our Police Authority Board to set our 2022-23 Policing Plan priorities.

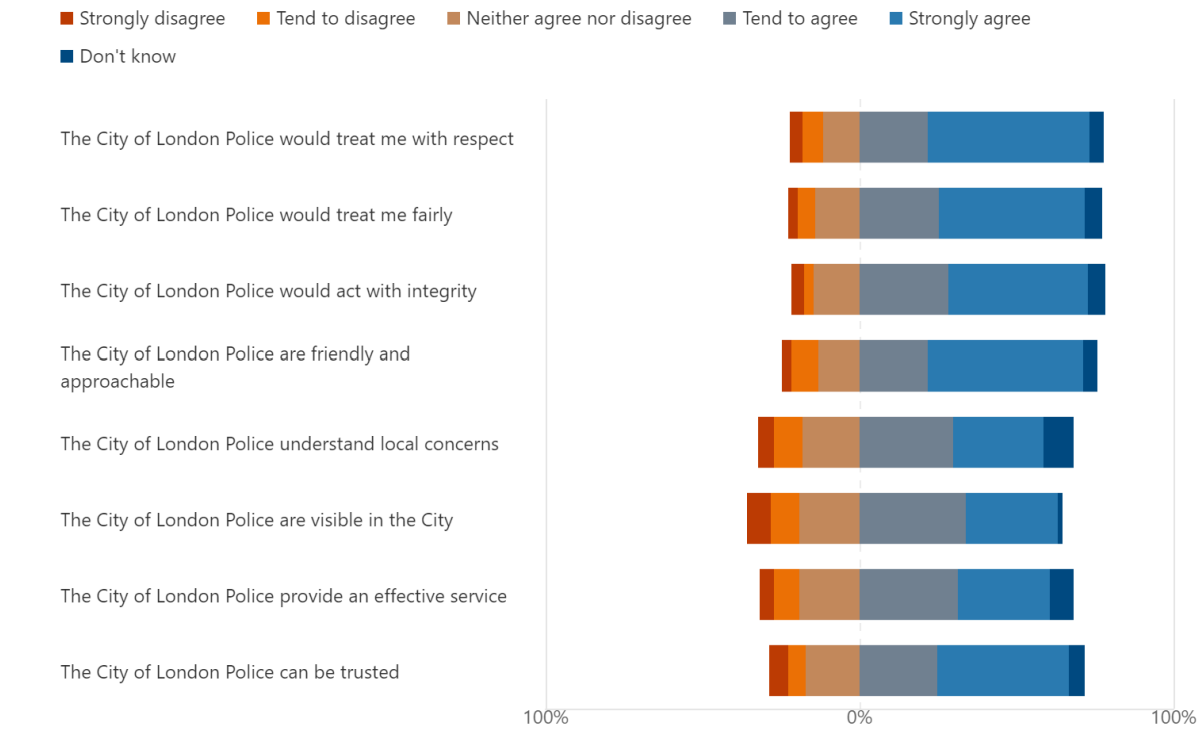
Q: Thinking about when you are in the City of London, please tell us how safe or unsafe you feel at different times.



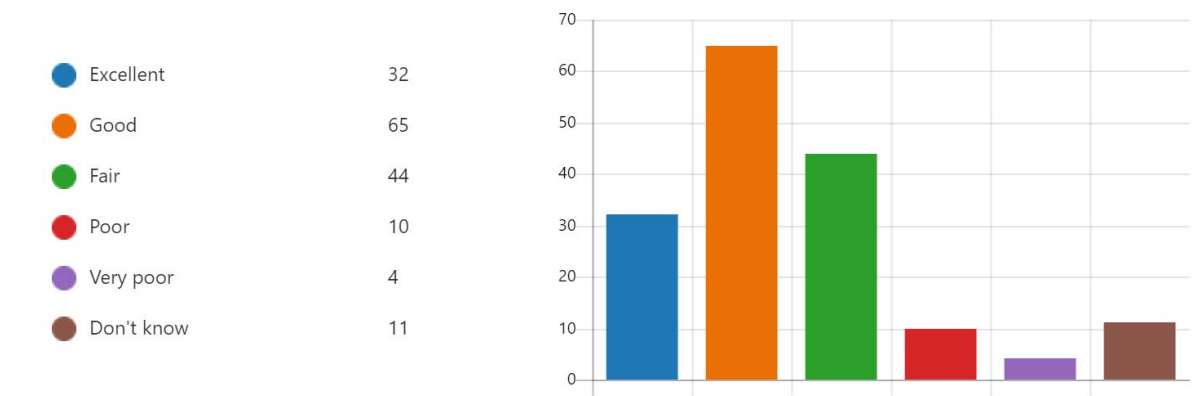
Q: How often, if at all, do you worry about becoming a victim of crime in the City of London?



Q: Thinking about if you were to have contact with the City of London Police, how much do you agree or disagree with the following statements?



Q: How good a job do you think the City of London Police is doing?

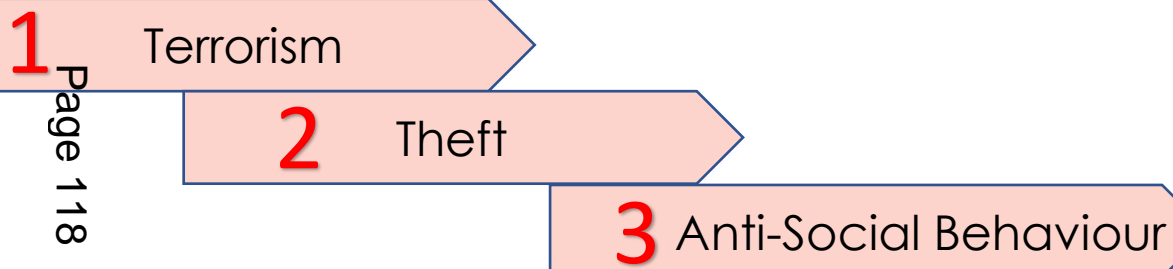


Q: If you were to report a crime or incident in future, how confident are you that you would receive a good service from City of London Police?

Very confident	37
Fairly confident	82
Not very confident	23
Not at all confident	13
Don't know	11



As part of the Community Survey, we asked you what your priority areas were for policing activities in order to ensure these concerns are addressed within our annual Policing Plan considerations. This year the following top three priorities were identified by respondents to our survey:



Responding to your feedback

To ensure the public remain safe in the Square Mile – day and night – we have undertaken several additional activities to target criminality and safeguard the public:

- Continued a programme of engagement with partners ([Victim Support](#) & City Corporation)
- Ran a social media campaign highlighting how victims can report sexual abuse
- Trained licensed premises in relation to vulnerability and sexual violence
- Supported the [Good Night Out](#) and [Reframe the Night](#) campaigns
- Participated in the national [StreetSafe](#) tool pilot

Highlights

Preventing re-offending

Our custody partnered with [Oak London](#) in March this year, a charity that supports men aged 18 to 30 who are at risk of offending or reoffending.

47% of adults are reconvicted within a year of being released from custody in the UK, and the risk of reoffending by young people and adults who have served a custodial sentence rises to 75%. To keep a person in prison costs the taxpayer £41,000 a year and reoffending currently costs the UK economy £11 billion a year. By contrast, each person who goes through Oak London costs the charity £800 and, having secured full funding for 2022, there is no cost to the individual.



Participants in Oak London's programme are taken out of the capital for a residential course and enrolled on a range of activities and seminars, before returning to London to be part of a 12-month mentoring programme and a community project.

Representatives from the charity have given presentations to Custody staff as part of their continuous professional development training. Now, details of the service the charity offers will be given to arrested persons who fit the criteria on their arrival in Custody. Custody staff can then refer detainees to the charity with their permission.

Vulnerability

One of the main duties of policing is to protect the vulnerable within society. With the mental health impact of the pandemic, the protection of the vulnerable remains a key service and demand remains high within the Square Mile.

Counter Terrorism – pursue

Over the course of the year, the Pursue Team investigated a number of incidents of hostile reconnaissance within the City, including:

- Section 58 Terrorism Act arrest of a subject taking images of Bishopsgate Police Station
- Section 58 Terrorism Act arrest of a subject taking images of Paternoster Square and London Stock Exchange (LSE).
- Section 58 Terrorism Act arrest of a subject taking images of Paternoster Square and LSE. A full CT investigation was completed and valuable CT intelligence was passed to partner agencies.



Counter Terrorism Conference

This year, our Counter Terrorism Security Advisors (CTSAs) hosted the inaugural Counter Terrorism Conference – CT2022. This event brought together more than 150 security professionals, business leaders and counter terrorism experts. During the event, a new tool, the 'Notify Pad' designed by the CTSAs was showcased. The aim of which is to ensure the correct information is obtained when reporting suspicious activity which allows for early notification of risks that may harm the City of London.

Local Vulnerability Assessments

Our CTSA team has continued to work on supporting the protective security of crowded places through completion of 'Local Vulnerability Assessments' on priority sites. In addition, the CTSA team has continued its close working relationship with the City Corporation by supporting them across security work programmes and projects, including Hostile Vehicle Mitigation plans, pavement licences and public realm advisory projects.

The CTSA team have delivered numerous products to disrupt terrorism, including attack planning activity such as hostile reconnaissance. These include See Check and Notify, Action Counters Terrorism training, etc.

Ask for Angela Scheme launched in the City

'Ask for Angela', a scheme which provides visitors to licensed premises with a codeword so they can get

help if they find themselves in an uncomfortable situation, launched in October 2021 in the Square Mile.



Christmas Party assault

Nabil Zerdi, 51, of Isleworth, was found guilty of two counts of sexual assault at Inner London Crown Court in August 2021. He had previously denied all charges against him. He sexually assaulted a woman twice while at her Christmas party in the City of London. He was sentenced to:

- Two year community order
- Five year notification requirement
- 30 days rehabilitation activity requirement
- £300 court costs and £90 victim surcharge
- 15 hours unpaid work requirement

Operation Luscombe

The City of London Police continue to run Operation Luscombe, an operation that was authored by the Partnerships team, to combat antisocial behaviour linked with begging. As lead force for this operation, we have continued to maintain a significant reduction in begging within the City and its associated antisocial behaviour to the tune of 49%. Working alongside this project is the forces wider stance to assist the local authority and the GLA in reducing homelessness within the capital. We work alongside a number of key partners to achieve this aim and operate a bi-weekly hub to assist the homeless into accommodation.

Bicycle theft reduction

The City of London Police have run a successful operation in reducing cycle theft, digital media advertising and engagement stands were deployed

to support the ongoing efforts and provide suitable education to the public on crime prevention practises. The high visibility of the police in hot spots worked as a detriment to offenders in the area while the police actively target this type of crime. Using a mix of modern and historic crime prevention messaging including 'lock it or lose it' enforced the message. Signage was created and displayed at Cycle bays around the City of London displaying our crime prevention message and how the local services can assist them. As part of the Bike registry scheme several hubs were set up in hotspot areas resulting in around 1300 bikes being registered.



National Servator

The National Project Servator Team (NPST) is based in the City of London Police, and works to Counter Terrorism Policing HQ. The NPST leads on Disruptive Effects (including hostile behaviour detection, deterrence and security minded communications) for all police forces in the UK and sets the national standards for other government departments who can use similar tactics. They are also responsible for the operationalisation of these tactics for businesses, with the SCan package which is delivered by our CTSAs.

Working with the Home Office, CPNI and NaCTSO, the team will be integral in supporting the roll out of the Protect Duty, and Publicly Accessible Locations over the next 3 years, developing products that match the change in demand, particularly from the private sector.

Preventing Economic Crime

The Force secured a six-year Criminal Banning Order for a fraudster targeting vulnerable members of the public. He exploited the pandemic by using 'COVID-19' as the subject of his messages, resulting in just under £1 million of losses and eroding public confidence in genuine COVID-19 messages from the Government. The defendant had also built fake websites to use in large-scale fraud and was selling advanced BOT programs to Organised Crime Groups.

Intellectual Property Crime

This year there was a successful operation where four raids, led by our Intellectual Property Crime Unit

(PIPCU), the Northwest Police Intellectual Property Crime Unit and Greater Manchester Police, uncovered an estimated £15 million worth of branded clothing, shoes, electricals, watches, jewellery, perfume and medicine, suspected to be counterfeit. In total, over 45,000 items were seized.

This joint action between the three forces, Border Force and Immigration Services, also saw 7 people arrested – 6 for offences relating to the importation and distribution of counterfeit goods, and 1 for intent to supply prescription drugs.



Fake Voluntary Emission Reduction credits

Earlier this year, two men were convicted of fraudulent trading of Voluntary Emission Reduction (VER) carbon credits that were essentially worthless. Paul Seakens and Luke Ryan used high pressure sales tactics to sell these credits on the basis that they were good and promising investments. In reality, there was no market for investors to sell them on and no realistic likelihood of there ever being one.

Total losses attributed to the victims identified in the case amounted to over £1.8m (although this is likely to be under-estimated). Financial analysis of bank statements showed well in excess of £30 million went through various company accounts controlled by Seakens.

Successful conviction of a £125,000 “money muling” scammer

A successful DCPCU investigation into a £125,000 “money muling” has resulted in a 3-year prison sentence. Prince Sean Namalima, 20, from Wolverhampton, pleaded guilty to conspiracy to convert criminal property. Namalima was found to have transferred and withdrawn money from various bank accounts belonging to other

individuals recruited to accept large amounts of illegally obtained money. Officers seized a mobile phone when they searched his address and found that the phone contained images of bank payment cards, bundles of cash and videos of him using ATMs or carrying large amounts of cash.



Fraud and Cyber Crime Reporting and Analysis Service

The City of London Police led on the submission of the Outline Business Case to replace the systems and services that underpin the National policing response to fraud and cyber-crime. This case was approved by the Home Office and HM Treasury in June 2021. The procurement to appoint a new supply chain who will work in partnership with us to replace the existing Action Fraud is progressing as planned and will see us move into the multi-agency final design phase of the new service in early 2023.

Enhanced Cyber Crime Reporting Service

Research on the existing Action Fraud service showed anecdotal evidence that Businesses do not report Cyber crime as they have a lack of confidence in the ability of the normal Action Fraud/NFIB reporting, recording and dissemination processes. In advance of the new Fraud and Cyber Crime Reporting and Analysis service (FCCRAS) going live we have introduced a new temporary service and process which diverts businesses away from the traditional route to specially trained Cyber Call Handlers and Crime reviewers to deliver a fast time enhanced response with an aim to increase reporting and action re cyber incidents. This service is proving to be a valuable addition and will also greatly inform the design of the new FCCRAS service.

Romance scams

A DCPCU investigation into Prince Rodriguez, 23, of Hackney, London was sentenced to four years in prison after pleading guilty to committing 6 counts of fraud, 2 counts of money laundering and breaching a restraining order.

Rodriguez was initially identified as being involved in a number of romance scams. The investigation then revealed he moved onto committing fraud against a number of banks by submitting counterfeit loan applications and contacting the bank to dispute transactions on accounts under his control in order to receive significant refunds. The money was retrieved by the bank and all victims fully refunded.



Cyber Griffin

Since its inception in 2018, [Cyber Griffin](#) has trained over 23,000 people, delivered more than 670 services and engaged with 650 organisations.

We are extremely pleased with the success of the accreditation we have now integrated into our services, attracting more take up of the programme.

Cyber Griffin has now become a largely digital service which has built its ability to offer all Cyber Griffin services year on year. We are pleased to report our strongest year to date.

Finally, the Cyber Unit are pleased with the feedback we have had from our cyber capability assessment service. Feedback shows that this service has made lasting security changes to their information security management systems (ISMSs). This is complex work which make positive results all the more satisfying to receive.

Project Servator celebrates 8 years

Our Project Servator team utilise a suite of tactics to combat the threat of terrorism within the City such as stop & search and resolution conversations to engage with the public. This tactic has been

developed over a number of years and despite the impact of the pandemic, we have continued to increase the use of this activity within the City. This year saw the Force celebrate 8 years of using this tactic within the Square Mile.

Project Servator has worked alongside to build relationships and provide See, Check and Notify (SCaN) training to some of London's most iconic sites.



Drugs arrests

Three members of an OCG were jailed for a total of 23 years after drugs worth £500,000 were seized following a series of warrants by the City of London Police:

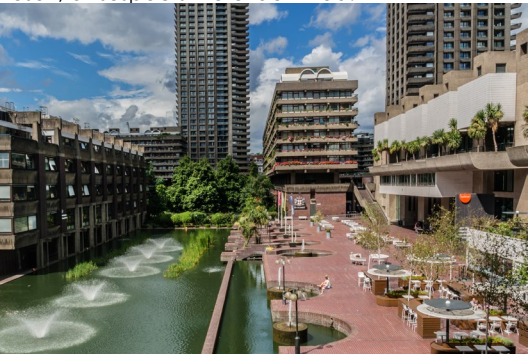
- Wesley Candida, 30, of Woodford Green, Essex, was sentence to 11 years in prison for three counts of conspiracy to supply Class A drugs and possession of criminal property
- Vanessa Candida, 29, of Woodford Green, Essex, was jailed for six years for three counts of conspiracy to supply Class A drugs and possession of criminal property
- Wanderson Rocha Dos Santos, 31, of Tower Hamlets, was sentenced to 6 years imprisonment for three counts of conspiracy to supply Class A drugs.



Major Crime Team

In July, our Major Crime Team (MCT) commenced an investigation into gang related violent disorder and GBH (wounding) where a male was stabbed twice during a gang motivated disorder outside VQ bar in Aldgate.

The MCT quickly established that whilst a violent disorder had occurred there was clearly one aggressing group of 8 suspects and a victim group who were acting to defend themselves. The MCT quickly identified the main aggressor who could be seen stabbing the victim as he ran away. As a result, all suspects were identified.



Community Engagement

Over the last year, there has been significant work undertaken in relation to community engagement and our wider partnership working. We have fundamentally changed our policing model with the launch of Sector Policing with dedicated ward officers tackling local crime and anti-social behaviour issues. To complement this, we have now fully launched the City Cluster Panels – each is made up of local people who agree a realistic and achievable course of action to address the issues raised by the community. Where appropriate to the demographics of the Cluster, every effort is made to ensure that a diverse group of people are recruited.

Special Constables

The force presently has 73 Special Constables, with a new cohort of 12 commencing training in summer 2022.

Over the past 12 months we have focussed on the return to BAU following the pandemic, implementing the recommendations arising from a comprehensive staff survey in spring 2021, delivering bespoke refresher “back to work” training to all officers requiring it, and returning duty hours and productivity to pre-pandemic levels. Progress against key metrics include:

- 72% Independent Patrol Status
- 50% of all duties (6,500 hours) on response (compared to 30%/4,309 hours in 2016)

- 2,750 duty hours policing the South-Western sector of the City during the initial lockdowns. To our knowledge, this is the first time that Special Constables have assumed *routine medium-term* responsibility for policing part of a major city.
- 2021 Christmas campaign best supported ever, with 16 & 17 officers on duty on key nights.
- In 2021 the special constabulary delivered 2,469 duties, 43 arrests, 69 assist arrests, 519 vehicle stops, 74 drivers reported, 542 incidents attended, 8 s136 MHA detentions and 230 stop and account/search.
- SCs remain active in specialist units including MPS Raptor Units, public order (16 SCs public order trained including the first 2 SCs in the UK to complete the MPS Public Order command course), cycle squad, ECD (Academy, NFIB & ECVCU), control room, Administration of Justice, and L&D.
- Diversity remains a focus: BAME representation has been increased to 17% and female representation remains at 21% (although this follows the transfer of 7 female SCs to the regular service in 2020)

Classification	Pre – OP ILLUM INATE	OP ILLUM INATE	% Chang e
Theft	198	119	-40%
Violence Against the Person	124	114	-8%
Anti-Social Behaviour	47	50	6%
Public Order	35	29	-17%
Sexual Offences	10	9	-10%
Robbery	8	3	-63%
Total	422	324	-23%

Our 2021 Christmas Campaign

Each year, the City experiences a rise in visitors over the Christmas period where people come to the Square Mile for entertainment, bars and restaurants during the festive period. Led by Local Policing Command Team and supported by the rest of the City of London Police ‘Operation Illuminate’ aimed to protect and reassure everyone who works and lives in the City of its safety, taking offenders off the streets and offering help and support to any victims of crime. This saw a 23% reduction in crime over the period.

Mental Health Street Triage service

The City of London Police work in partnership with the Clinical Commissioning Group and the NHS to provide a Mental Health Street Triage service. The service has been successfully run since 2017. This service in the past 12 months has been uplifted to include additional hours, covering from 9am until 3am. Over the past twelve months the service has helped to avoid 77% of police encounters ending in a detention under the Mental Health Act. Positive engagement with people in mental health crisis after initial police contact has been trialled for the past 12 months. This model has significantly reduced return rates of persons in distress.

Suicide Prevention

A core role of the Force is to safeguard vulnerable members of society, those in mental distress who may contemplate self-harm are of concern to the Force and are a critical focus for how we respond to public safety within the City. In mid 2021 the City Police conducted environmental visual audits of all sites in the City to explore potential opportunities to implement structural changes to the built environment to dissuade/prevent those in distress for using those locations as sites of contemplation to end their lives. The results of this have been passed to the City of London Corporation who are acting on Force advice.



The Partnership and Prevention Hub are working with several external partners to achieve a more integrated approach to suicide prevention across Central London, this includes the private security sector and charitable partners, such as the RNLI. It is hoped that these projects will allow for early detection and mitigation for those in mental health crisis.

Action Fraud Campaign

Action Fraud campaign activity:

- Action Fraud led a total of 8 national campaigns in 2021
- Collaborated or supported on 10+ partner campaigns including joint initiatives with the NECC, Cyber Protect and NCA.
- Amplified and shared NHS communications on emerging COVID19 threats, trends and national messaging across the year.
- The best performing campaign of 2021/22 was the Action Fraud / Cyber Protect Christmas campaign. This messaging achieved 18.7m reach and 88.7m impressions.



Economic Crime Victim Care Unit (ECVCU): As a direct result of the success of the pan-London Action Fraud Economic Crime Victim Care Unit (ECVCU), the Home Office provided funding to roll-out the Action Fraud National Fraud Economic Crime Victim Care (NEVCU) in areas outside London with potential to extend the service across England and Wales. This service provides three levels of support to victims:

- Level 1 – Victim Contact which gives appropriate support to less complex cases where there is no indication of vulnerability identified within the report. The level one team provides Protect/crime prevention advice and signposting to local support services.
- Level 2 – Victim Care handles more complex and difficult cases, where an indication of vulnerability has been identified within the report. Reports are thoroughly reviewed by a dedicated team (Victim Reception Team) and passed to a team of Victim Care Reviewers who will contact victims to further assess their vulnerability and work with victims to not only provide Protect/crime prevention advice, but to link in with existing services (e.g., NHS, social services) and to ultimately help the victim to cope and recover from the fraud.
- Level 3 – Where serious risks of harm present following contact with victims, a more localised response may be required from the victim's home force. This local level support focuses on safeguarding and supporting the most vulnerable at-risk individuals using a multi-agency approach and/or to manage other issues identified through level 1 and/or level 2 contact (e.g., domestic violence).

Largest Ever Proceeds of Crime Forfeiture in the UK

We worked together with the Crown Prosecution Service (CPS) and the private sector to achieve the largest ever proceeds of crime forfeiture in the UK. Du Toit & Co LLP (a South African law firm operating from the UK) and Xiperias Ltd (a Cypriot registered company) both agreed to forfeit €34m (£28.75m), to settle litigation alleging that the funds in two bank accounts were the proceeds of crime.

Officers worked with the CPS, partners from Europol, foreign law enforcement agencies and stakeholders from the private sector, including Lloyds Banking Group, to conduct an expeditious investigation involving lines of enquiry in multiple jurisdictions across three continents. The investigation identified overwhelming evidence that the monies were unlawfully obtained from international money laundering and layered through the UK banking system to present a veneer of legitimacy.

Tackling Serious and Organised Crime

We worked with Gloucestershire Constabulary's Serious and Organised Crime Unit to tackle a London-based Organised Crime Group (OCG), who have been targeting elderly and vulnerable victims across the South West. This led to officers from Gloucestershire executing a warrant on 6 April at an address in London, supported by the Force and our digital dog, Fred.

Four offenders were present, one of whom was caught in the act of making a telephone call to an elderly victim who had already handed over £8,000 and was in the process of transferring more money to suspects. Our officers then went onto search other addresses where £20,000 in cash, Rolex watches, designer clothing and documentation relating to the cash purchase of a £40,000 vehicle were found. All four offenders were charged with conspiracy to commit fraud by false representation and possession of criminal property and were remanded at court.

Business Email Compromise frauds

Our Cyber Unit worked in conjunction with the FBI and Microsoft Digital Crimes Unit to identify and pursue two suspects responsible for a significant credential harvesting campaign, used for a number of very convincing Business Email Compromise frauds against a number of high-profile companies and losses are in the millions. We assisted with arrests in both the USA and Nigeria. The USA suspect is on remand and the Nigerian suspect awaits extradition.

Amazon Web Services & Schools Project

During the year, we worked with Amazon Web Services on our Schools Project. This involved 43 students from across 5 schools participating in a series of workshops focusing on self-development, accessing digital careers, policing opportunities, and tackled issues such as online bullying and other crimes affecting young people. This has received excellent feedback from all participants, and we will now look to develop this further over the coming year.

Secure City Programme

The Secure City Programme is a 3 year programme due to conclude in March 2023. It consists of 5 workstreams and 2022 will be a key year for the programme.

The project plan aims to have all on street cameras upgraded and all bridge cameras installed by November 2022 to the decommissioning of the legacy system.

The new Azure based video management system is currently in test phase with a number of cameras operating within it. It is planned for a soft launch into the Control room in March 2022, and the gradual addition of new cameras as they come online. By November 2022, this will include connectivity with the Metropolitan Police Service, Transport for London and British Transport Police.



Middle East

The City of London Police developed a specialist protective security course for the Middle East, as part of a government to government programme, combining both first responder skills and Counter Hostile Reconnaissance, underpinned with a strong focus on community engagement.

ColP provided a key theme lead for an initial female cadet programme being delivered in the Middle East. Our Officer supervised a blended team of serving and retired officers and ex military instructors.

Mexico SESNP project

ColP have developed a force wide Strategic Threat and Risk Assessment Process delivering a far more efficient way with which to define capability and capacity. This ground-breaking initiative was suggested for utility in Mexico, and is currently being delivered virtually to Nezahualcoyotl, a Municipality in the Metropolitan district of Mexico City.



Police Uplift Programme

The current recruitment campaign to recruit up to 100 new constables as part of its commitment to the national Police Uplift Programme has been an excellent opportunity to talk to the local community and beyond and attract people to join the Force. Since January 2022, we have attended 41 outreach events and have attracted over 540 people to apply.



Equality & Inclusion Update

Our vision is to ensure that all communities, individuals, charities and businesses receive an excellent and consistent experience. Our Force engages with local, national and international communities across the globe, who all have diverse needs. We know that we cannot achieve this vision without a high performing workforce that embraces diversity and inclusion at its core.

To help us achieve this vision, we have introduced an Equality strategy. This strategy is shaped by:

- Best practice feedback from the Inclusive Employers Standard benchmarking audit;
- Anonymous focus groups, 1:1 interviews, and an all-staff survey;
- National Police Chiefs' Council (NPCC) Equality, Diversity and Inclusion (EDI) strategies and toolkits;
- Public Sector Equality Duty reports including gender pay gap and staff demographic data;
- Existing City of London Police work in this area including the Black, Asian & Minority Ethnic action plan;
- City of London Police Leadership principles;
- National Police Code of Ethics;
- Current best practice in inclusion and diversity.

Equality & Inclusion Strategy

Our Equality & Inclusion Strategy has six workstreams:

-  Recruitment and onboarding
-  Training and development
-  Health and wellbeing
-  Community engagement
-  Leadership and culture
-  Retention and exiting the organisation

The Commissioner is the strategic lead for the strategy and action plan. The Professionalism and Trust Portfolio lead, is responsible for overseeing the activities of the action plan. Each action plan work stream, is led by a senior leader, who is supported by specialist advisors, staff support networks and union representatives. To ensure we achieve the ambitions and successful measures set out in our strategy, the action plan and toolkits are smarter, measurable and achievable. The force provides a quarterly update to the Police Authority Board, who hold Chief Officers accountable for the Force performance and the progress of strategy.

Our full Equality strategy can be found here: [Team and objectives | City of London Police](#)

Gender Pay Gap

Every year the force publishes its Gender Pay Gap Data (GPGD) figures. The gender pay gap is the difference between the average (mean or median) earnings of men and women across a workforce. Each year the force compares the Gender Pay Gap figures to understand any changes or trends.



Comparing ColP GPGD 2020 to 2021

Hourly pay gap – For median hourly pay, men and women earn the same. In 2020, there was a gap of 0.5% (in favour of women) but that gap was closed in 2021. When comparing mean (average) hourly pay, women's mean hourly pay was 3% higher than men's in 2020, but in 2021, the gap was 1.1% higher, closing the gap by 1.9%.

Our gender pay gap figures for the previous years can be found in our Public Sector Equality Duty Report here: [Equality and diversity employment statistics | City of London Police](#)

Representation within City of London Police

The Police Uplift Programme offers a significant opportunity to build representation within the Force. To enable this, we have invested in our recruitment and retention capabilities, including a dedicated outreach team and a refreshed communications and engagement plan. We have introduced measures to support under represented groups through the selection process. **Our aim is to have new intakes represented by 40% ethnic minorities and 50% female.** Comparing data from July 2020 until now, our figures on representation have been fairly static over the past two years (with 9% of our police officers from an ethnic minority background and 23.8% female) and so recognise that these are challenging ambitions but ones we are working hard to improve.

The Force is currently represented in the following way:

	Female	Male	Ethnic Minority
Police Officers	23.8%	76.2%	9%
Police Staff	58.7%	41.3%	22.6%
Special Constables	21.7%	78.3%	15.9%
Police Cadets	58.6%	41.4%	51.7%

Professionalism & Trust

As part of the restructure of our services within 2021/22, we formed a new business area to focus on Professionalism and Trust. Listening to the feedback from the public and the media around the perceptions of policing within the UK following a number of high-profile incidents, we are determined to show that police officers can be trusted and that we provide a professional and valued service to all members of society.

To showcase the work, we are undertaking around this area, this section of our annual report is dedicated to our professional standards, equality and inclusion work and how we are responding to the national focus on tackling Violence Against Women & Girls (VAWG).



Over the course of this year, we have developed a [Strategic Delivery Plan](#) to combat violence against women and girls.

This plan is based upon three pillars:

Relentlessly Pursuing Perpetrators

This area focuses on our ongoing commitment to bring more perpetrators of violence against women and girls to justice, working with partner agencies as a "whole system" response. This includes work to reduce case attrition and to address concerns and experiences of victims.

Creating Safer Spaces

This area focuses on protecting women and girls in public spaces, at home and online. We will continue to work closely with our partners, and in particular with the City of London Corporation, to protect women from victimisation.

Improving Trust and Confidence in Policing

This area focuses on our commitment to improve internal and external trust and confidence. We know that we must do more to earn the trust and confidence of women and girls, ensuring that our officers and staff uphold the highest professional standards.

Crime Statistics

We monitor criminality within the City, so that we can react to emerging trends and patterns to keep residents, workers and visitors as safe as possible. The impact of COVID-19 saw crime reduce in 2020/21. During 2021/22, we saw footfall to the City return; this resulted in a rise in criminality. Within our Policing Plan, we aimed to ensure the level did not reach that recorded in 2019/20 – this was achieved.


Positive Outcome Rate

The outcome of providing a policing service to the victim is ensuring there is a positive outcome from an investigation, e.g. conviction of the suspect. We aim to put the victim at the heart of each investigation, ensuring we provide resolution, so that victims have faith in the provision of our service.



2019/2020	2020/2021	2021/2022
21%	33%	21%


(In 2020/21, the pandemic allowed the Force to focus on more investigations, increasing our positive outcome rate.)

Crime Category	Positive Outcomes 2019/2020		Positive Outcomes 2020/2021		Positive Outcomes 2021/2022	
	Count	Rate	Count	Rate	Count	Rate
All Other Theft Offences	121	4%	42	10%	44	4%
Arson	0	-	2	100%	0	-
Bicycle Theft	18	4%	23	6%	32	12%
Burglary – Business/Community	59	19%	56	43%	20	9%
Burglary – Residential	2	9%	1	6%	0	-
Burglary All	61	18%	57	39%	20	9%
Criminal Damage	52	19%	48	27%	36	13%
Death or Serious Injury Unlawful Driving	0	-	0	-	0	-
Drug Possession	508	89%	474	84%	490	82%
Drug Trafficking	122	77%	74	148%	45	96%
Homicide	2	100%	0	-	0	-
Miscellaneous Crimes Against Society	130	49%	63	29%	75	36%
Other Sexual Offences	15	19%	9	31%	6	7%
Possession of Weapons Offences	40	50%	25	50%	34	63%
Public Disorder	109	23%	84	33%	121	23%
Rape	2	13%	1	8%	0	-
Rape & Other Sexual Offences	17	18%	26	63%	6	5%
Robbery of Business Property	14	39%	3	25%	2	13%
Robbery of Personal Property	9	7%	6	9%	1	1%
Shoplifting	352	40%	196	35%	239	35%
Stalking & Harassment	13	11%	12	15%	12	11%
Theft from Motor Vehicle	2	1%	2	3%	1	1%
Theft from the Person	26	3%	8	3%	6	1%
Theft of Motor Vehicle	8	20%	4	11%	5	10%
Vehicle Interference	1	9%	0	-	0	-
Violence with Injury	93	26%	55	52%	50	12%
Violence without Injury	132	18%	89	29%	94	16%
All Crime	1830	21%	1277	33%	1313	21%

ALL CRIME			
2019/2020	(2020/2021)	2021/2022	% Change compared with 2019 benchmark
8716	(3862)	6322	-28% 






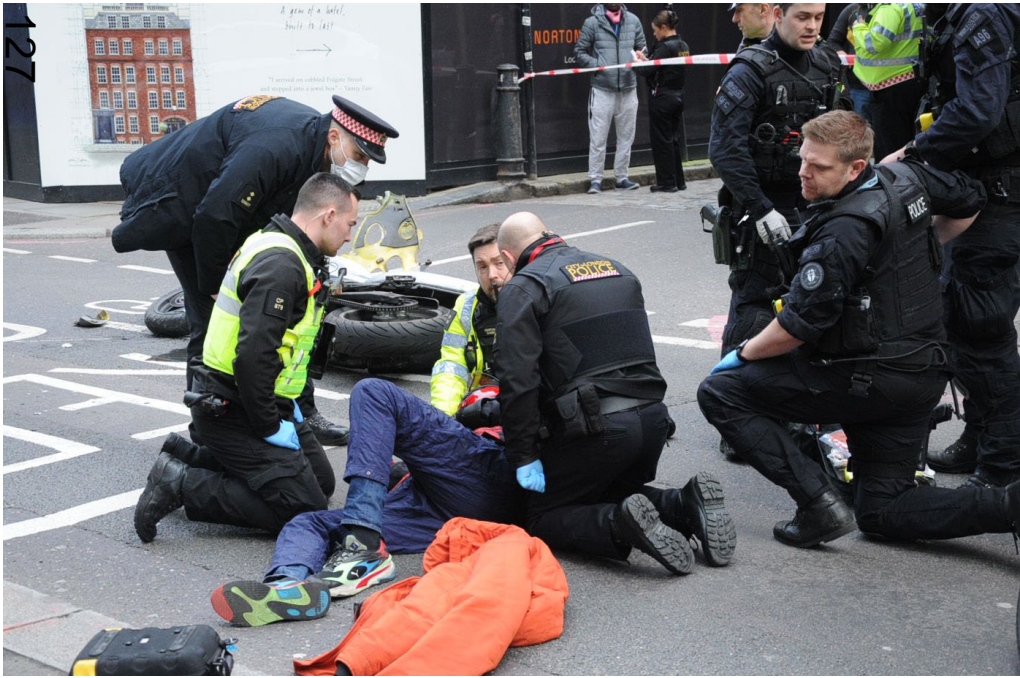
ALL OTHER THEFT OFFENCES	ARSON	BICYCLE THEFT	BURGLARY BUSINESS/COMMUNITY
2019/2020	2019/2020	2019/2020	2019/2020
2677	3	441	310
2020/2021	2020/2021	2020/2021	2020/2021
413	2	375	130
2021/2022	2021/2022	2021/2022	2021/2022
1054	3	267	211
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark
-61% 	0	-39% 	-32% 

BURGLARY RESIDENTIAL	BURGLARY ALL	CRIMINAL DAMAGE	DEATH OR SERIOUS INJURY UNLAWFUL DRIVING
2019/2020	2019/2020	2019/2020	2019/2020
24	334	270	0
2020/2021	2020/2021	2020/2021	2020/2021
16	146	179	0
2021/2022	2021/2022	2021/2022	2021/2022
18	229	278	0
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark
-25% 	-31% 	3% 	0
DRUG POSSESSION	DRUG TRAFFICKING	HOMICIDE	MISCELLANEOUS CRIMES
2019/2020	2019/2020	2019/2020	2019/2020
573	158	2	261
2020/2021	2020/2021	2020/2021	2020/2021
564	50	0	217
2021/2022	2021/2022	2021/2022	2021/2022
599	47	0	211
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark
4% 	-71% 	-100% 	-20% 

OTHER SEXUAL OFFENCES	POSSESSION OF WEAPONS OFFENCES	PUBLIC DISORDER	RAPE
2019/2020	2019/2020	2019/2020	2019/2020
77	78	470	16
2020/2021	2020/2021	2020/2021	2020/2021
29	50	258	12
2021/2022	2021/2022	2021/2022	2021/2022
92	54	535	28
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark
19%	-31%	14%	75%
ALL SEXUAL OFFENCES	ROBBERY OF BUSINESS PROPERTY	ROBBERY OF PERSONAL PROPERTY	SHOPLIFTING
2019/2020	2019/2020	2019/2020	2019/2020
93	36	122	890
2020/2021	2020/2021	2020/2021	2020/2021
41	12	66	562
2021/2022	2021/2022	2021/2022	2021/2022
120	15	96	689
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark
29%	-58%	-21%	-23%

STALKING & HARASSMENT	THEFT FROM A MOTOR VEHICLE	THEFT FROM PERSON	THEFT OF MOTOR VEHICLE
2019/2020	2019/2020	2019/2020	2019/2020
115	170	902	38
2020/2021	2020/2021	2020/2021	2020/2021
81	79	317	37
2021/2022	2021/2022	2021/2022	2021/2022
110	155	799	49
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark
-4%	-9%	-12%	29%
VEHICLE INTERFERENCE	VIOLENCE WITH INJURY	VIOLENCE WITHOUT INJURY	
2019/2020	2019/2020	2019/2020	
11	365	707	
2020/2021	2020/2021	2020/2021	
0	105	308	
2021/2022	2021/2022	2021/2022	
0	422	590	
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	
-100%	16%	-17%	

VICTIM-BASED VIOLENCE	VICTIM-BASED ACQUISITIVE	CRIMES AGAINST SOCIETY
2019/2020	2019/2020	2019/2020
1282	5621	1540
2020/2021	2020/2021	2020/2021
535	2007	1139
2021/2022	2021/2022	2021/2022
1242	3353	1446
% Change compared with 2019 benchmark	% Change compared with 2019 benchmark	% Change compared with 2019 benchmark
-3% 	-40% 	-6% 

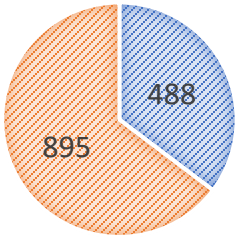


Our Resources

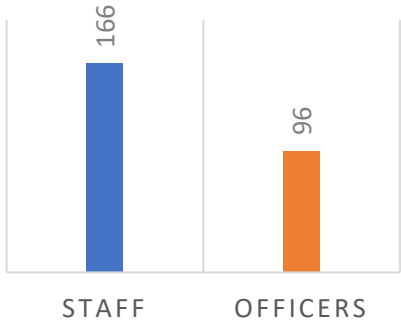
*as at 31.03.22

TOTAL

Staff Officers



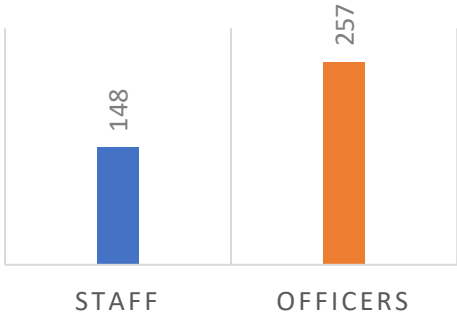
CORPORATE SERVICES



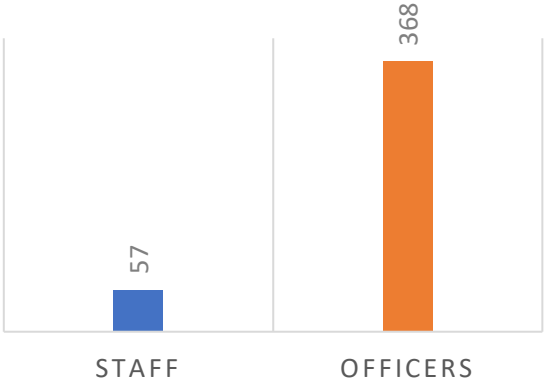
NATIONAL LEAD FORCE



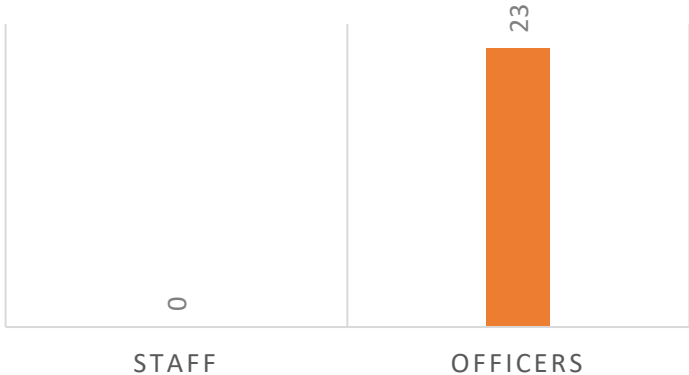
SPECIAL OPERATIONS



LOCAL POLICING



REGIONAL ROCU



Our Finances

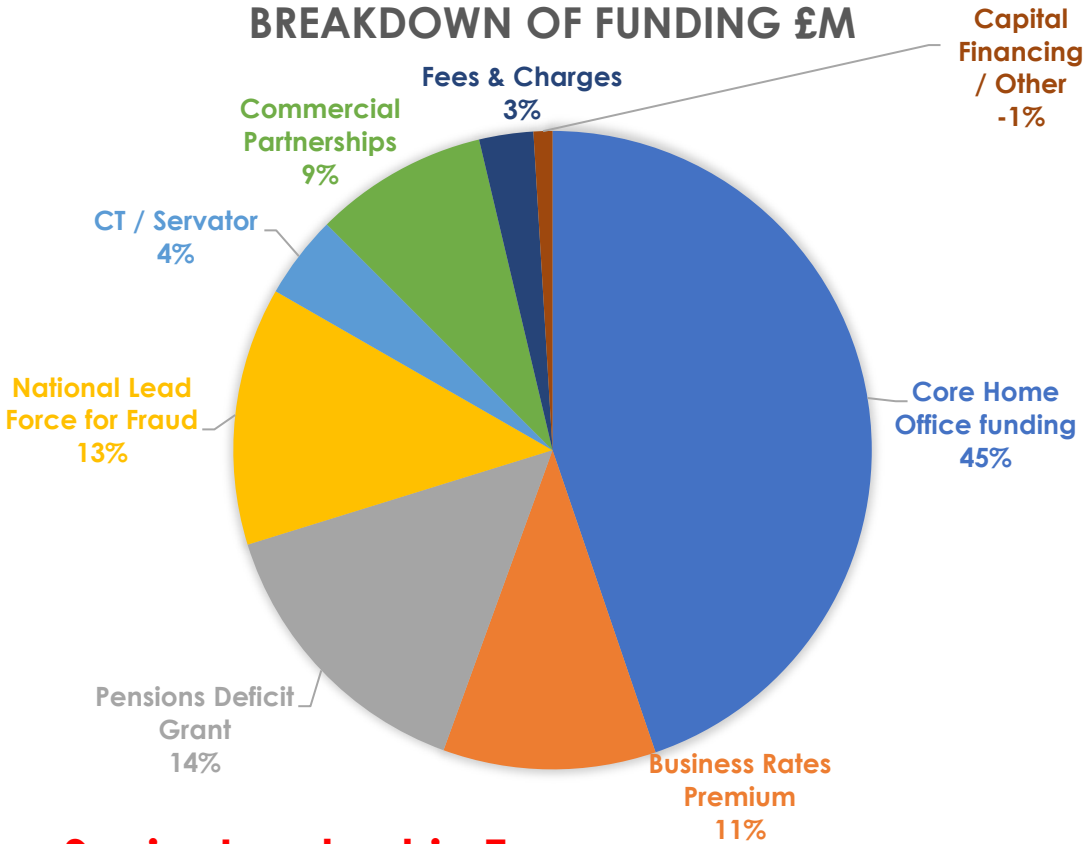
2021/22				2020/21	
Income & Expenditure					
Revenue	Latest Approved Budget		Outturn (unaudited)		Outturn
	£'000	%	£'000	%	£'000
EXPENDITURE					
Employee-Related Expenses	115.9	75	112.0	72	106.6
Other Expenditure					
Premises Costs	3	2	4.0	3	11.9
Transport Costs	2.2	1	2.7	2	0.8
Supplies & Services / Other	32.7	21	38.4	24	32.3
Total Expenditure	153.8	100	157.1	100	151.6
Total income	-153.8		-159.1		-156.2
(Under) / Over Spend	0		-2.0		-4.6

Notes
21/22 underspend in Employee-Related Expenses due to lower pensions deficit contribution
21/22 outturn includes higher income and expenditure than budget for National Lead Force grants
20/21 outturn for Premises Costs includes £7.7m Supplementary Revenue Projects
21/22 Transport Costs recategorised from 2020/21

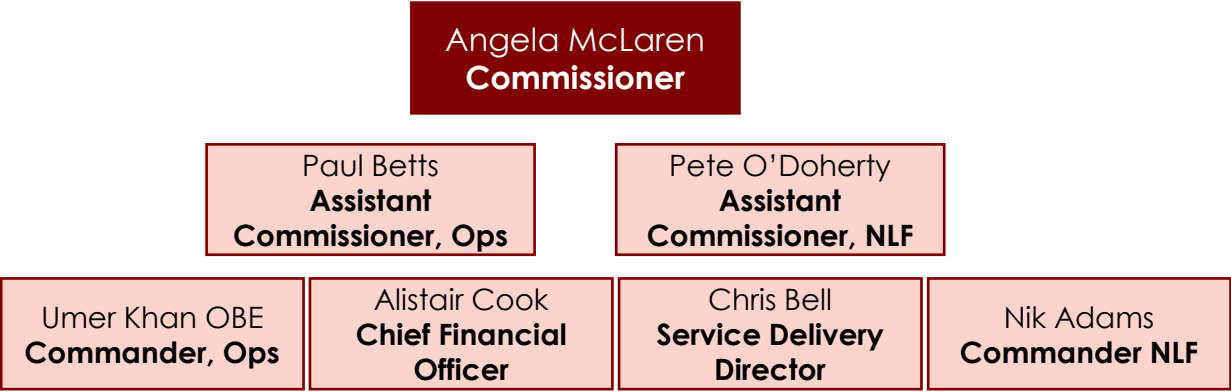
Breakdown of funding:

Core Home Office funding	70.2m
Business Rates Premium	16.9m
Pensions Deficit Grant	23.0m
National Lead Force for Fraud	20.5m
CT/Servator	6.6m
Commercial Partnerships	13.8m
Fees & Charges	4.3m
Capital Financing / Other	(1.5m) *NB Capital Financing including Action Fraud loan repayment) is treated as negative funding in City Fund budgeting terms
Total Funding	153.8m

BREAKDOWN OF FUNDING £M



Our Senior Leadership Team



Our Police Authority Team

The Court of Common Council is the Police Authority for the Square Mile as set out in the City of London Police Act 1839. Under Section 56 of the Act, the Common Council delegated to the Police Board all its police authority functions (with the exception of the appointment of the Commissioner). The Committee's role is to make sure the City of London Police runs an effective and efficient service by holding the Commissioner to account; to ensure value for money in the way the police is run, and to set policing priorities considering the views of the community.

Police Authority Board Members

Deputy James Thomson (Chair)
Tijs Broke (Deputy Chair)
Caroline Addy
Munsur Ali
Douglas Barrow
Nicholas Bensted-Smith
Deputy Keith Bottomley
Alderman Professor Emma Edhem
Alderman Timothy Hailes
Graham Packham
Dawn Wright
Andrew Lentin (External Member)
Sir Craig Mackey (External Member)
Deborah Oliver (External Member)

Resources Risk and Estates Committee

Alderman Timothy Hailes (Chair)
Deputy James Thomson (Deputy Chair)
Deputy Keith Bottomley
Tijs Broeke
Helen Fentimen
Deputy Jamie Ingham Clark
Andrew Lentin
Graham Packham
Dawn Wright
Deputy Philip Woodhouse
Dan Worsley (External Member)
Adrian Hanstock (External Member)
Michael Landau (External Member)

Police Pensions Board

Alexander Robertson Martin Marr (Chair)
John Todd (Deputy Chair)
Henry Nicholas Almroth Colthurst
Helen Isaac
Timothy Parsons
Mike Reed

Economic Crime and Cyber Committee

Deputy James Thomson (Chair)
Tijs Broeke (Deputy Chair)
Deputy Keith Bottomley
Graeme Doshi-Smith
Alderman Professor Emma Edhem
Alderman Timothy Hailes
Deputy Edward Lord
Alderman Bronek Masojada
Dawn Wright
Deputy Catherine McGuinness (Ex-Officio Member)
Michael Landau (External Member)
Andrew Lentin (External Member)

Strategic Planning & Performance Committee

Tijs Broke (Chair)
Andrew Lentin (Deputy chair)
Caroline Addy
Munsur Ali
Deputy Keith Bottomley
Helen Fentimen
Alderman Timothy Hailes
Deborah Oliver
Deputy James Thomson
Deputy Philip Woodhouse
Moawia Bin-Sufyan (External Member)
Adrian Hanstock (External Member)

Professional Standards and Integrity Committee

Caroline Addy (Chair)
Deborah Oliver (Deputy Chair)
Douglas Barrow
Nicholas Bensted-Smith
Tijs Broeke
Mary Durcan
Alderman Professor Emma Edhem
Helen Fentimen
Michael Mitchell (External Member)
Alice Ripley (External Member)
Deputy James Thomson



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Report – Markets Board

Report of Urgent Action Taken: Markets Board Composition

To be presented on Thursday 21st July 2022

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

SUMMARY OF ACTION TAKEN

1. As a result of recommendations brought forward under the Governance Review, the Court of Common Council agreed to revise the composition of the Markets Committee, which was then a Ward Committee, and rename it the “Markets Board”.
2. The new Board was constituted by the Court in April 2022, and it was agreed that it would comprise of 15 elected Members of the Court of Common Council. The Board has oversight of the management of all matters relating to Smithfield Market, Billingsgate Market and New Spitalfields Market.
3. Proposals came forward from the New Spitalfields Market Tenants Association, suggesting that representatives of each of the three markets’ traders’ associations should participate in the Boards meetings, in an advisory (non-voting) capacity. This would provide an opportunity for enhanced working relationships between the City Corporation and the traders’ associations, as well as a more effective means of facilitating the expertise and experience of the traders to be fed into the development of not only plans for the MCP, but also the running of the markets more generally. The Board was supportive of this proposal and delegated authority to allow this change to be pursued.
4. It was, therefore, proposed that the composition of the Board be amended to provide for a nominated representative of the Chair of each of the Smithfield Market Tenants’ Association, the London Fish Merchant Association (Billingsgate), and the New Spitalfields Market Tenants’ Association to serve on the Board in a non-voting capacity.
5. This change was approved under urgency procedures by the Markets Board and Policy & Resources Committee.
6. Conscious of the time pressures associated with the MCP and the need to begin working collaboratively as soon as possible, it was considered desirable by the Markets Board for the proposed membership changes to be implemented as swiftly as possible, so as to allow for representatives to attend the next Markets Board meeting on 13 July 2022. Approval by the Court was sought under urgency procedures, to allow for arrangements to be confirmed in advance of this meeting.
7. Members are asked to note the urgent action taken.

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

DATED this 12th day of July 2022.

SIGNED on behalf of the Committee.

Deputy Henry Pollard
Chairman, Markets Board

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Report – City Remembrancer

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

To be presented on 21st July 2022

*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 Economic Crime (Transparency and Enforcement) Act 2022 (Commencement No. 2 and Saving Provision) Regulations 2022 No. 638

15th June 2022

These Regulations bring into force certain provisions of the Economic Crime (Transparency and Enforcement) Act 2022 which relate to financial sanctions. This includes provision amending the Policing and Crime Act 2017 so that civil monetary penalties can be applied to persons for breaches of financial sanctions, with no requirement for the Treasury to prove that the person had knowledge or reasonable cause to suspect their activity breached sanctions. The Regulations also bring into force provisions which amend the 2017 Act to allow the Treasury to publish notices detailing violations by persons of financial sanctions in cases where the Treasury have decided not to impose a penalty.

The Import of Animals and Animal Products and Approved Countries (Amendment) Regulations 2022 No. 735

1st July 2022

These Regulations amend several pieces of retained European Union law to provide for the exercise of functions previously carried out by the European Commission to protect human and animal health in response to biosecurity and food safety risks. The amendments allow the Secretary of State to rapidly change certain conditions for imports of animals and animal products into Great Britain, for example in response to an overseas animal disease outbreak or food safety incident, by specifying the change in a document published for that purpose.

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

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