

PLEASE BRING THIS AGENDA WITH YOU

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

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



COMMON COUNCIL

SIR/MADAM,

You are desired to be at a Court of Common Council, at **GUILDHALL**, on
THURSDAY next, the **5th day of December, 2024**.

Members of the public can observe the public part of this meeting by visiting the
[City of London Corporation YouTube Channel](#)

IAN THOMAS CBE,
Town Clerk & Chief Executive.

*Guildhall,
Wednesday 27th November 2024*

Martha Grekos

Tim Hailes



Aldermen on the Rota

2

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 10 October 2024.

For Decision
(Pages 7 - 22)

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 **Appointments**

To consider the following appointments:

- (A) One Member on the **Board of Governors of the Guildhall School of Music and Drama.**
(No Contest)
Nominations received:-
Deputy Ann Holmes

For Decision

7 **Bill for an Act of Common Council**

To:-

- Regularise arrangements for the election of Ward Beadles.

(First and Second Reading).

Together with a report of the Policy and Resources Committee thereon.

For Decision
(Pages 23 - 32)

8 **Policy and Resources Committee**

To consider proposed updates to the City Corporation's Modern Slavery Statement.

For Decision
(Pages 33 - 58)

9 **Port Health & Environmental Services Committee**

To consider the annual review of charges for the Heathrow Animal Reception Centre.

For Decision
(Pages 59 - 66)

10 **Licensing Committee**

To consider proposals relating to the Gambling Act 2005.

For Decision
(Pages 67 - 144)

11 **Planning & Transportation Committee**

To consider the annual On-Street Parking Accounts and approve submission to the Mayor of London.

For Decision
(Pages 145 - 150)

12 **Vote of Thanks to the Late Lord Mayor**

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

For Decision
(Pages 151 - 152)

13 **Motions**

To consider the following Motions:-

(A) By Deputy Christopher Hayward

"That the Resolution of Thanks to the late Lord Mayor, passed by Common Hall on 30 September last, be presented in a form agreeable to him?"

(B) By Deputy Andrien Meyers

"That the Resolution of Thanks to Dame Susan Carol Langley, Alderwoman and Insurer and Bronek Edmund Masojada, Alderman and Insurer, the late Sheriffs of the City, passed by Common Hall on 30 September last, be presented in a form agreeable to them?"

(C) By Deputy Dawn Wright

"That Deputy Dawn Wright be appointed to the Planning & Transportation Committee, in the room of Michael Cassidy, for the Ward of Coleman Street.

4

14 **The Freedom of the City**

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

For Decision
(Pages 153 - 158)

15 **Questions**

16 **Audit and Risk Management Committee**

To note the Committee's Annual Report.

For Information
(Pages 159 - 164)

17 **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 165 - 166)

18 **Ballot Results**

19 **Resolutions on Retirements, Congratulatory Resolutions, Memorials.**

20 **Awards and Prizes**

21 **Docquets for the Hospital Seal.**

MOTION

22 **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 Paragraphs 2 and 3 of Part 1 of Schedule 12A of the Local Government Act, 1972, or they otherwise 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

23 Non-Public Minutes

To agree the non-public minutes of the meeting of the Court held on 10 October 2024.

For Decision
(Pages 167 - 170)

24 Policy & Resources Committee**(A) Barbican Renewal Programme**

To consider proposals for the Barbican Renewal Programme.

For Decision
(Pages 171 - 318)

(B) City Fund - Development Agreement and Acquisition

To consider proposals relating to the London Wall West Development agreement and associated property acquisition

For Decision
(Pages 319 - 342)

25 Finance Committee**(A) Stage 1 and 2 Report for the Provision of Electricity and Gas Supplies**

To consider proposals relating to an energy procurement strategy.

For Decision
(Pages 343 - 348)

(B) Housing Repairs and Maintenance Contracts – Procurement Stage 2 Award Report

To consider proposals relating to the award of a maintenance contract.

For Decision
(Pages 349 - 354)

(C) New Spitalfields and Billingsgate Markets Waste Management & Market Cleansing Procurement Stage 2 Award Report

To consider proposals relating to the award of a waste management and cleansing contract.

For Decision
(Pages 355 - 360)

6

26 **Corporate Services Committee**

(A) MFS Request for Innovation & Growth Role

Request for Market Forces Supplement

For Decision
(Pages 361 - 366)

(B) MFS Request for City Surveyor's Department Role

Request for Market Forces Supplement

For Decision
(Pages 367 - 370)

27 **Civic Affairs Sub-Committee**

(A) Applications for Hospitality

To consider applications for hospitality.

For Decision
(Pages 371 - 374)

(B) City Events Programme

To consider recommendations concerning the annual City Events Programme.

For Decision
(Pages 375 - 380)

28 **City Bridge Foundation Board**

To note action taken under urgency procedures in relation a freehold disposal.

For Information
(Pages 381 - 382)

29 **Fraud and Cyber Crime Reporting and Analysis Service Procurement Committee**

To note action taken under urgency procedures in relation to a contract extension.

For Information
(Pages 383 - 384)

30 **Investment Committee**

To note action taken under urgency procedures in relation to two investment property disposals.

For Information
(Pages 385 - 386)



MAINELLI, MAYOR

COURT OF COMMON COUNCIL

10th October 2024
MEMBERS PRESENT

ALDERMEN

Alexander Robertson Martin Barr (Alderman)
Sir Charles Edward Beck Bowman (Alderman)
Professor Emma Edhem (Alderman)
Sir Peter Estlin (Alderman)
Alison Gowman CBE (Alderman)
Prem Goyal OBE (Alderman)
Martha Grekos (Alderwoman)

Timothy Russell Hailes (Alderman)
Robert Picton Seymour Howard (Alderman)
Robert Charles Hughes-Penney (Alderman)
Gregory Jones KC (Alderman & Sheriff)
Vincent Keaveny CBE (Alderman)
Elizabeth Anne King, BEM JP (Alderwoman)
Tim Levene (Alderman)

Sir Nicholas Stephen Leland Lyons (Alderman)
Professor Michael Raymond Mainelli (Alderman)
Christopher Makin (Alderman)
Bronek Masojada (Alderman)
Simon Pryke (Alderman)
Sir William Anthony Bowater Russell (Alderman)
Kawsar Zaman (Alderman)

COMMONERS

Joanna Tufuo Abeyie MBE
George Christopher Abrahams
Munsur Ali
Randall Keith Anderson, Deputy
Jamel Banda
Brendan Barns
Matthew Bell
The Honourable Emily Sophia Wedgwood Benn
Nicholas Michael Bensted-Smith JP
Ian Bishop-Laggett
Christopher Paul Boden, Deputy
Keith David Forbes Bottomley, Deputy
Tijs Broeke
Timothy Richard Butcher, Deputy
Michael John Cassidy CBE
Henry Nicholas Almroth
Colthurst, Deputy
Simon Duckworth, Deputy OBE
DL

Chief Commoner Peter Gerard
Dunphy, Deputy
Mary Durcan JP
John Ernest Edwards, Deputy
Helen Lesley Fentimen OBE JP
John William Fletcher, Deputy
John Foley
Dawn Frampton
Marianne Bernadette Fredericks, Deputy
Steve Goodman OBE
John Griffiths
Jason Groves
Madush Gupta, Deputy
Caroline Wilma Haines
Christopher Michael Hayward, Deputy
Ann Holmes, Deputy
Michael Hudson
Wendy Hyde

Henry Llewellyn Michael Jones MBE
Shravan Jashvantrai Joshi, Deputy MBE
Gregory Alfred Lawrence
Charles Edward Lord, OBE JP, Deputy
Antony Geoffrey Manchester
Paul Nicholas Martinelli, Deputy
Catherine McGuinness CBE
Wendy Mead OBE
Andrien Gereith Dominic Meyers, Deputy
Eamonn James Mullally
Benjamin Daniel Murphy
Deborah Oliver TD
Suzanne Ornsby KC
Judith Pleasance
James Henry George Pollard, Deputy
Jason Paul Pritchard
Anett Rideg

Ian Christopher Norman Seaton MBE
Hugh Selka
Paul Singh
Tom Sleigh
Sir Michael Snyder, Deputy
Naresh Hari Sonpar
James St John Davis
Mandeep Thandi
James Michael Douglas
Thomson, Deputy
James Richard Tumbridge
Shailendra Kumar Kantilal Umradia
William Upton KC
Jacqueline Roberts Webster
Ceri Wilkins, Deputy
Glen David Witney
Dawn Linsey Wright, Deputy

*Dunphy, P. G.,
Deputy;
Colthurst, H.,
N., A., Deputy*

Resolved unanimously - That David Chalk, one of the Sheriffs of the City, be invited to take his seat on the Dais.

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 the Minutes of the Court held on 12 September are correctly recorded.
4. Election of Chief Commoner The Court proceeded to elect a Chief Commoner for 2025/26.
One valid nomination had been received in accordance with Standing Order No. 18, namely, that of James Henry George Pollard, Deputy.
Resolved – that James Henry George Pollard, Deputy be declared to be elected to the office of Chief Commoner for 2025/26.
Deputy Pollard spoke to thank Honourable Members for their support.
5. Vote of thanks to the Lord Mayor Deputy Christopher Hayward, for the Ward of Broad Street, read the draft terms of a vote of thanks to the Right Honourable The Lord Mayor, which was intended to be moved formally at the next meeting of the Court.
The Lord Mayor was heard in reply.
6. Letter A letter of the Lord Mayor Elect, declaring his assent to take upon himself the Office of Lord Mayor, was laid before the Court.
7. Mayoral Engagements The Right Honourable The Lord Mayor reported on his recent engagements, which included visits to Sheffield, Paris, the Baltic and South-East Asia.
8. Policy Statement The Chairman of the Policy and Resources Committee took the opportunity to make a statement, updating the Court on his attendance at the Party conferences, a trip to Scotland and visits to various City Corporation sites.

9. CITY OF LONDON POLICE AUTHORITY BOARD

(Tijs Broeke)

30 June 2024

Appointment of Commissioner of Police for the City of London

In accordance with Standing Order No. 63, the City of London Police Authority Board submitted a candidate for appointment to the Office of Commissioner of Police for the City of London. Details of the candidate and the interview and assessment process were set out in an accompanying confidential report at Item 27(B).

It was advised that the candidate would appear before the Court of Common Council (in private session) and give a presentation. Upon the candidate's withdrawal from the Court, a ballot would be held for the appointment and, on

completion of that, the public would be re-admitted and the decision of the Court made known.

*Dunphy, P. G.,
Deputy;
Colthurst, H.,
N., A., Deputy*

Resolved – that the public be excluded from the meeting for the interview of the candidate for Commissioner, together with the consideration of other non-public items of business, on the grounds that they involved the likely disclosure of exempt information as defined in Paragraphs 1 and 3 of Part 1 of the Local Government Act, 1972

Summary of the exempt item considered whilst the public were excluded

The candidate for the post of Commissioner, having been called in, addressed the Court on a given subject and then withdrew.

The Court proceeded to ballot on the appointment.

Whilst the ballot count was conducted and the public excluded, the Court proceeded to consider Items 23 to 27.

The ballot for the Commissioner having been taken up and cast, the Lord Mayor declared Peter O'Doherty to have been appointed.

Whereupon the Court resolved that strangers be re-admitted.

The Town Clerk reported that the Court of Common Council had, in accordance with Standing Order No. 63(1), appointed Peter O'Doherty to be Commissioner.

Whereupon The Right Honourable The Lord Mayor declared Mr O'Doherty to be duly appointed to the Office of Commissioner of Police for the City of London subject to receipt of approval of His Majesty The King (to be sought in accordance with Section III of the City of London Police Act 1839) and to the taking of an Oath before one of His Majesty's Judges, on the usual terms and conditions relating to the appointment of Chief Officers and subject to such other regulations as this Court had adopted or may hereafter adopt in respect of the said appointment, and to all other orders and regulations of this Court with reference to its Officers.

Peter O'Doherty accepted the appointment, thanked the Court and withdrew. Resolved – That Peter O'Doherty be appointed to the Office of Commissioner of Police for the City of London on a date to be confirmed subject to receipt of the approval of His Majesty The King (to be sought in accordance with Section III of the City of London Police Act 1839) and subsequently to the candidate taking an Oath before one of His Majesty's Judges.

10. Appointme
nts

The Court proceeded to consider appointments to the following Committees:-

- (A) **Barbican Residential Committee** (One vacancy)
(No contest)

Nominations received:-
Michael Hudson

Read.

Whereupon the Lord Mayor declared Michael Hudson to be appointed to the Barbican Residential Committee.

(B) **Cripplegate Foundation** (One vacancy)
(Contest)

Nominations received:-
Dawn Frampton

Read.

Whereupon the Lord Mayor declared Dawn Frampton to be appointed to the Cripplegate Foundation.

11. **POLICY AND RESOURCES COMMITTEE**

(Deputy Christopher Michael Hayward)

26 September 2024

(A) Member Financial Support Policy - Uplift

The Court received a report of the Policy and Resources Committee concerning Member allowances.

Resolved – That the Court of Common Council agrees:

1. That an inflationary uplift should be applied to the Extended Member Support Scheme element of the Member Financial Support Policy, on the basis of the Consumer Price Index, to update the current allocation to £9,000 (applicable from April 2025);
2. That the allowance be set and reviewed every four years, in advance of each allout Common Council elections;
3. That a provision be added, requiring the annual publication of Members' claims, and
4. That the Town Clerk be authorised to make such changes as required to the MFSP to allow Members to claim under both the EMSS and the Carer / Childcare element of the Financial Loss Scheme.

26 September 2024

(B) Panel of Independent Persons Report

The Court received a report of the Policy and Resources Committee concerning the activities of the Panel of Independent Persons.

A Member drew the Court's attention to an email which had been circulated to all Members of the Court which, in their opinion, was racist, Islamophobic and homophobic in respect of its content. They also asked the Chairman of the Policy and Resources Committee for an update on when a revised Member Code of

Conduct would be brought to the Court for consideration, with another Member asking the Chairman if access to the all-Member email contact group could be reviewed.

Replying, the Chairman said that he would respond to the question on the Code of Conduct following the meeting. He shared the Member's concerns over the content of the email, expressing his disappointment that this message had been circulated and suggested that he would refer the matter to the Equality, Diversity and Inclusion Sub (Policy and Resources) Committee for further consideration.

Resolved – That the report be received and its contents noted..

12. **EDUCATION BOARD**

(Naresh Sonpar)

17 June 2024

City of London Corporation: Education Strategy Update

The Court received a report of the Education Board concerning the Education Strategy.

The Chair of the Board introduced the report, noting the ambitions to deliver excellence in education.

Resolved – That Members approve the Education Strategy 2024-29.

13. **FINANCE COMMITTEE**

(Deputy Henry Nicholas Almroth Colthurst)

24 September 2024

Extension of Central London Works and Pioneer Support programmes

Members received a report of the Finance Committee concerning the extension of two Central London Forward Programmes.

Resolved – That the Court approves:-

- i. A seven-month extension of Central London Works and Pioneer Support, to the end of April 2025;
- ii. CLF accepting up to £10m of additional funding from DWP to fund this extension;¹
- iii. The signing of associated documents with DWP to accept the funding and extend the programme;
- iv. The signing of associated documents with Ingeus to extend the programme.
- v. That the Finance Committee be authorised to:
 - a. vary the extension agreements with DWP if the transition period and/or funding arrangements change; and
 - b. vary the contract with the provider commissioned to deliver the programme

(subject to approval by the CLF Programmes Board).

14. 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:

Ali Raza Abbasi <i>David Arnold Raines</i> <i>Martin Stanley Riley</i>	a Solicitor <i>Citizen and Distiller</i> <i>Citizen and Distiller</i>	Liverpool, Merseyside
Carol Elizabeth Abbasi <i>David Arnold Raines</i> <i>Martin Stanley Riley</i>	a Solicitor <i>Citizen and Distiller</i> <i>Citizen and Distiller</i>	Liverpool, Merseyside
Deborah Belinda Abergil <i>Hugh Joseph Ogus</i> <i>Adrian Charles Mumford</i>	a Bookkeeper <i>Citizen and Lightmonger</i> <i>Citizen and Musician</i>	Barnet, London
Adetunji Adebeyejo Akintokun, MBE <i>CC Joanna Tufuo Abeyie, MBE</i> <i>Deputy Andrien Gereith Dominic Meyers</i>	a Head of Enterprise Solutions <i>Citizen and Haberdasher</i> <i>Citizen and Goldsmith</i>	Barnet, London
The Rt. Hon Sir Robert James Buckland, KBE KC <i>Deputy Christopher Michael Hayward</i> <i>Ald. Sir William Anthony Bowater Russell</i>	a Barrister and Politician <i>Citizen and Pattenmaker</i> <i>Citizen and Haberdasher</i>	Swindon, Wiltshire
The Rt. Hon. Sir Conor Burns <i>Deputy Charles Edward Lord, OBE, JP</i> <i>Ald. Vincent Thomas Keaveny, CBE</i>	a Politician <i>Citizen and Broderer</i> <i>Citizen and Solicitor</i>	Bournemouth, Dorset
Ching Jack Choi <i>Mei Sim Lai</i> <i>David Lawrence Byron Stringer-Lamarre</i>	a Trainee Solicitor <i>Citizen and Horner</i> <i>Citizen and Glazier</i>	Lambeth, London
Hannah Nenna Chukwu <i>The Rt. Hon The Lord Mayor</i> <i>Ald. Alastair John Naisbitt King, DL</i>	a Literary Editorial Director <i>Citizen and World Trader</i> <i>Citizen and Blacksmith</i>	Lambeth, London
Sarah Lucy Stewart Dickson <i>Malcolm De Mowbray Adam Stewart</i> <i>Robin Hugh Harcourt Williams</i>	a Town Planner <i>Citizen and Chartered Accountant</i> <i>Citizen and Arts Scholar</i>	Lambeth, London
Victor George Dodig <i>Ald. Prem Babu Goyal, OBE</i> <i>Ald. Michael Raymond Mainelli</i>	a Bank of Commerce Chief Executive Officer <i>Citizen and Goldsmith</i> <i>Citizen and World Trader</i>	Toronto, Ontario, Canada

Paschal James Martin Donohoe <i>The Rt. Hon The Lord Mayor</i> <i>Deputy Christopher Michael Hayward</i>	an Irish Government Minister <i>Citizen and World Trader</i> <i>Citizen and Pattenmaker</i>	Dublin, Ireland
Lynsey Jane Ford <i>CC John William Fletcher</i> <i>Ald. Prem Babu Goyal, OBE</i>	a Journalist, Researcher and Librarian <i>Citizen and Common Councilman</i> <i>Citizen and Goldsmith</i>	Merton, London
Elaine Pamela Godfrey <i>Rafael Steinmetz Leffa</i> <i>Jacqueline Chan</i>	an Electrical Contracting Company Director <i>Citizen and International Banker</i> <i>Citizen and Gold and Silver Wyre Drawer</i>	Aylesbury, Buckinghamshire
Paul Kenneth Hazeldene <i>Colin George Ring</i> <i>George Richard Cannell</i>	a Contracts Manager <i>Citizen and Loriner</i> <i>Citizen and Loriner</i>	Surrey
Colonel Colin Robert Jones <i>Alan Leslie Warman</i> <i>Diane Irene Warman</i>	a Crown Servant <i>Citizen and Clockmaker</i> <i>Citizen and Clockmaker</i>	Hampshire
H.E. Ilir Kapiti <i>Jonathan Martin Averns</i> <i>Michael John Tadman</i>	an Ambassador <i>Citizen and Fletcher</i> <i>Citizen and Fletcher</i>	Camden, London
Neil David Kedward <i>David Alastair Morgan-Hewitt</i> <i>Philippe Roland Rossiter</i>	a Hotelier <i>Citizen and Innholder</i> <i>Citizen and Innholder</i>	Pembrokeshire, Wales
Daphne Susan Morgan <i>Deputy James Henry George Pollard</i> <i>Ald. Simon Tony Pryke</i>	an Investment Director, retired <i>Citizen and Skinner</i> <i>Citizen and Painter-Stainer</i>	Greenwich, London
Paul Richard Skinner Morris <i>CC David James Sales</i> <i>CC Jaspreet Hodgson</i>	a Verderer of Epping Forest <i>Citizen and Insurer</i> <i>Citizen and Vintner</i>	Essex
Dermot Joseph Moynihan <i>The Rt. Hon The Lord Mayor</i> <i>Ald. Alastair John Naisbitt King, DL</i>	a Financial Services Company Chief Executive <i>Citizen and World Trader</i> <i>Citizen and Blacksmith</i>	Jersey, Channel Islands
Angelos Thomas Papakostas <i>Ald. Timothy Russell Hailes, JP</i> <i>Deputy Madush Gupta</i>	a Student <i>Citizen and Pewterer</i> <i>Citizen and Pewterer</i>	Haringey, London
Jack Joseph Perry <i>Ald. Timothy Russell Hailes, JP</i> <i>Deputy Madush Gupta</i>	an International Trade Company Chief Executive <i>Citizen and Pewterer</i> <i>Citizen and Pewterer</i>	Kensington and Chelsea, London
Rt Hon. Sir Hugh Robertson <i>Deputy Christopher Michael</i>	<i>A Company Director</i> <i>Citizen and Pattenmaker</i>	Sittingbourne, Kent

Hayward

*Deputy Charles Edward Lord, Citizen and Broderer
OBE, JP*

Dr Aranzazu Rodriguez Guerrero a Medical Doctor Hammersmith and Fulham,
London

*Mahmoud Hamid Warriah Citizen and Stationer & Newspaper
Maker*

*Simon Paul Hamlet Citizen and Stationer & Newspaper
Maker*

Paul Stuart Scully a Politician Elmbridge, Surrey

Deputy Christopher Michael Hayward Citizen and Pattenmaker

Ald. Prem Babu Goyal, OBE Citizen and Goldsmith

Benjamin Paul Sizer, JP a Bank Director Gravesend, Kent

Lisa Rutter Citizen and Pattenmaker

Anne Elizabeth Holden Citizen and Basketmaker

Hiu Hung Tai a Corporate Affairs Director Tower Hamlets, London

Ald. Timothy Russell Hailes, JP Citizen and Pewterer

Deputy Madush Gupta Citizen and Pewterer

Anthony Charles Taylor a Licenced Taxi Driver Hertfordshire

Michael Osborne Citizen and Basketmaker

Robert Brian Linton Citizen and Blacksmith

Tevin Titilope Tobun a Technology and Logistics Surrey

Chief Executive

CC Dr Joanna Tufuo Abeyie, MBE Citizen and Haberdasher

Deputy Andrien Gereith Dominic Meyers Citizen and Goldsmith

Andrew Bernard Walker a Commercial Insurance Essex

Auditor, retired

Stephen David Willis Citizen and Musician

Dr Millan Sachania Citizen and Musician

Michael Oliver Warren a Hotel Group Managing Salisbury, Wiltshire

Director

David Alastair Morgan-Hewitt Citizen and Innholder

Philippe Roland Rossiter Citizen and Innholder

John Weedon a Reinsurance Broker Islington, London

Ronald Peter Murray Citizen and Firefighter

Alan William Mabbutt Citizen and Firefighter

Ian Anthony Yeoman, BEM a Client Services Manager and Havering, Essex

Band Director

CC David James Sales Citizen and Insurer

CC Timothy James McNally Citizen and Glazier

Dr Elsa Gayle Zekeng a Technology Company Chief Lambeth, London

Executive

The Rt. Hon The Lord Mayor Citizen and World Trader

Ald. Alastair John Naisbitt King, DL Citizen and Blacksmith

DL

Read.

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

15. Motions There were no motions.

16. Questions
Murphy, B., to
the Chairman
of the
Community and
Children's
Services
Committee.

Homelessness and rough sleeping

Ben Murphy asked a question of the Chairman of the Community and Children's Services Committee concerning homelessness and rough sleeping in the Square Mile.

In reply, the Chairman recognised that rough sleeping continued to rise in London and the Square Mile. In 2023/24, there had been 656 recorded individuals sleeping rough in the Square Mile, the 5th highest local authority total in London. There had been 66% more rough sleepers in the last quarter than in the same period in 2023/24, and the last five quarters had seen an increase in the previous month. The Chairman also highlighted the importance of supporting the 'hidden homeless' to prevent rough sleeping.

The causes of and response to street homelessness was complex, and compounded by issues of transient immigration status and local connections. The factors culminating in rough sleeping occurred far from the point at which people slept on the streets, and there could be a lifetime of engagement with services in many areas and countries. The City of London Corporation's response was provided through the work of a team that provided assessment, support and interventions, working closely with health, social care and accommodation providers. The City Corporation commissioned an outreach service from Thamesreach, who delivered daily outreach shifts, and had recently opened a specialist assessment centre for rough sleepers at Snow Hill Court. A safe women's only space for victims of domestic abuse had also recently been opened.

Despite this action taken by the City Corporation, the City had seen an increase in tent encampments, particularly at the Monument and Castle Baynard Street. The multi-agency approach was continuing to support the people in these encampments. The City Corporation adopted a welfare-first approach, and had seen successful outcomes at the Monument site earlier this year. The Homelessness and Rough Sleeping Sub-Committee had received updates on the situation at Castle Baynard Street. The Chairman regretted that a recent incident at the latter had resulted in a serious injury to one of the occupants of a tent following an altercation with another occupant. Following this, many occupants had been moved towards a temporary accommodation while police investigations were undertaken. Unused tents and property were being moved into storage, which would allow the area to be cleaned and the property to be protected. Further work on these and any future encampments was being embedded into policy development, and this would be reported back to Members in early 2025.

The Chairman concluded her answer by saying that under the leadership of the Homelessness and Rough Sleeping Sub-Committee, officers continued to ensure that services evolved to try and match the increasing complexity of need. This commitment would be underpinned by research work. It was recognised that high private rents were a barrier, and the City Corporation would continue to work with providers of private rented accommodation to try and sustain the capacity in our local services.

As a supplementary question, Mr Murphy asked the Chairman if the City Corporation was on track to reach Government's goal of ending rough sleeping by 2027. In reply, the Chairman said this was an ambitious target, and the City Corporation's status as a 'net importer' of rough sleepers meant it would be extremely difficult to meet. The Chairman assured the Court that the City Corporation was working as hard as possible to find accommodation, and provide care and welfare services for those in need.

Member personal safety

*Ali, M., to the
Chairman of
the Policy and
Resources
Committee*

Munsur Ali asked a question of the Chairman of the Policy and Resources Committee concerning the safety and personal security of Members, noting his own recent personal experiences.

The Chairman began by expressing his support for the Honourable Member on a personal level. He said that no Members should have to worry about their personal safety as they engaged in public life.

The Chairman informed the Court that he had first-hand experience of threats and intimidation, including death-threats. It was abhorrent, affecting every aspect of one's life, and the Chairman extended his deepest sympathies for the treatment he has been subjected to.

The Chairman was aware that the incidents in the question were the subject of police investigation and so he would not go into specifics. Any behaviour that involved potential criminal offence is primarily a matter for the police.

Members were right to expect a reasonable level of security inside Corporation buildings and additional security could be arranged at other official events, such as wardmotes, as needed. In appropriate circumstances, the City Corporation could also explore civil proceedings, such as applying for an injunction.

The Chief Commoner had contacted all Honourable Members regarding advice and guidance on safety.

The Chairman felt that the City Corporation could improve on how it signposted Members to advice and security briefings. In the past, Member security briefings have been offered by Counter Terrorism Policing, for instance, and the Local Government Association (LGA) and ProtectUK also provided useful material. The Chairman finished by suggesting that now was a good time to draw these different resources together and ensure they were signposted clearly to so that they can be easily located and used.

The Chief Commoner asked a supplementary question, asking if the Chairman agreed that everything should be done to ensure support. The Chief Commoner highlighted the Employee Assistance Programme and urged any Member who was a victim of abuse to report it to the City of London Police as soon as possible and, if comfortable, to the Chief Commoner or the Town Clerk. The Chairman agreed with the Chief Commoner.

Deputy John Fletcher, providing examples of his own experiences, supported Mr Ali's statements, and said he would have welcomed it if he had known about the available support. He was concerned that it was a coordinated attack in advance of the 2025 elections. In reply, the Chairman expressed his sympathies with Deputy and agreed that there was more to be done, especially in light of the elections.

Jason Pritchard asked the Chairman to provide further detail on the possibility of applications for injunctions. In reply, the Chairman said that this was an area on which the Comptroller and City Solicitor would be able to provide further information.

Ben Murphy asked the Chairman if the new Commissioner of the City of London Police could find a liaison from the Police to help Members. In reply, the Chairman said this was an excellent suggestion, and he would look to the new Commissioner to help facilitate this.

Destination City and Culture workstream

The question was deferred.

Commercial real estate sector

*Joshi, S.,
Deputy, to the
Chairman of
the Policy and
Resources
Committee*

Deputy Shравan Joshi asked a question of the Chairman of the Policy and Resources Committee, asking if the Chairman would direct officers to produce a paper considering if the commercial real estate sector should be included in the Financial and Professional Services (FPS) grouping.

In reply, the Chairman agreed that the City Corporation should consider how it engaged with the Real Estate industry more collaboratively to promote the shared interests in delivering best in class business accommodation.

The Chairman felt that this work should focus initially on working with the real estate sector in the Square Mile, building on the work being carried out by the Environment, Innovation & Growth and City Surveyor's Departments, to further promote the City as a destination, distinct within London, for inward investment to both occupiers and investors. This work was being prioritised in the Destination City programme. The Environment Department enjoyed a close relationship with Innovation and Growth's Trade and Investment Team and the team had recently supported the Planning Chairman in representing the City Corporation at the Munich Expo conference and in engaging with international asset managers and owners who were investing in both real estate and the FPS sector.

This was an area where officers are currently developing the City Corporation's thinking and the Chairman said that Deputy Joshi was right to stress its importance

and to support it in his role as Chairman of the Planning and Transportation Committee. Once scoping has been completed, the Chairman felt it would be right for a paper to come to the Policy and Resources Committee as suggested – and he would request that such a paper was commissioned in due course.

The Chairman concluded by informing the Court that he was due to deliver keynote speech that evening at the City Property Association's annual dinner, at which he would emphasise the importance of this sector to the Square Mile.

*Groves, J., to
the Chairman
of the Planning
and
Transportation
Committee*

Jason Groves to the Chairman of Planning and Transportation Committee

Jason Groves asked the Chairman of the Planning and Transportation Committee if he could provide an update on plans to increase allocated space for dockless bikes, and on his negotiations with other London councils and the bike companies on tackling the issue of dockless bikes parking on public footpaths.

The Chairman of the Planning and Transportation Committee began his reply by sharing the frustrations with the elongated processes that had to be conducted before meaningful enforcement could begin. This feeling was shared with many of the City Corporation's London Councils partners and Transport for London.

The City currently had 87 dockless bays, of which 23 were shared with e-scooters. This provided capacity for 660 bikes and 104 scooters. The City Corporation would install another 19 bays this financial year, to increase capacity to over 800 spaces, and additional capacity for more bays had been identified. Where appropriate, more bays would be installed as part of transport and public realm projects. The City Corporation was working hard to provide additional parking space for dockless bikes, but the Chairman emphasised that it was the responsibility of operators to manage their fleets in accordance with available capacity and the City Corporation's requirement for all dockless bikes to be left in designated bays. The Chairman represented the City Corporation on the London Councils' Transport and Environment Committee which was actively developing a single pan-London contract for dockless bikes and e-scooters. The City Corporation had formally stated its intent to join the contract when it came into effect and it was expected it would lead to better compliance and the ability to fine operators for exceeding fleet sizes and for continual poor parking practice. However, the Chairman noted that timing for the contract was currently unclear. He hoped it would be in place next year. Ultimately, there was need for national legislation to give councils the ability to regulate dockless operators, which currently fell outside the legislative framework. The City Corporation had previously called on Government to grant these powers, and the Chairman said that others, including the MP for the Cities of London and Westminster, were also advocating for this. The Chairman would be writing to the Minister for Transport to highlight the increasingly urgent need for legislation.

Mr Groves asked a supplementary question, asking for further information on the possibility of additional bays, and if the Chairman would commit to having further conversations with the dockless bike companies on the possibility of introducing enhanced fines in certain areas. In reply, the Chairman said that the correct way to report on this was through the Streets & Walkways Sub-Committee.

Deputy Marianne Fredericks asked the Chairman if he agreed that the City

Corporation needed to be firmer in using its current powers in dealing with operators. The Chairman replied to agree with Deputy Fredericks, and said that officers were working within the full realm of their current powers to ensure that operators behaved.

Deputy Ann Holmes, noting that dockless bikes in her Ward were blocking access to footpath users with accessibility needs and to emergency vehicles, asked the Chairman if he agreed that there was a need to act urgently as the situation was becoming a life or death issue. In reply, the Chairman regretted that those with the highest accessibility needs were those most affected. The Streets and Walkways Sub-Committee would ensure that this issue was properly addressed and that accessibility needs were considered as a priority.

Sports engagement strategy

The question was withdrawn and deferred to December meeting.

*Mullally, E., to
the Chairman
of the Planning
and
Transportation
Committee*

Questions at committee meetings

Eamonn Mullally, noting a recent email sent by the Chairman of the Planning and Transportation Committee on his approach to the conduct of debate at meetings of the Planning Applications Sub-Committee, including on questions and calls to move for a vote, asked the Chairman of the Committee if he appreciated that this approach could be damaging to the City Corporation's reputation as a planning authority.

The Chairman began his reply by providing the internal context for those Members who did not sit on the Sub-Committee. He had issued, in his capacity as Chairman of the Sub-Committee, advance notice of how he planned to manage the timings of debates on applications more closely. This included a framework of how much time he proposed to allocate to each section: from the presentations from officers, presentations for objectors, questions from Members, and so on; it also contained the suggestion that, given the size of the sub-committee, he might initially only take one question per Member on each section.

The Chairman clarified that his email had not provided any comment on welcoming calls for Members to move to the vote. The mechanism that the "question to be now put" remained a mechanism available to all Members of any committee and, in line with Standing Order 37(3), a Chairman could veto this if they were of the opinion that the Motion was premature or in any sense is an abuse of the rule of the Committee. The Chairman noted that this was a right he had historically exercised.

This guidance was developed at the Chairman's request following considerable feedback from the membership after several three-plus hour meetings. As a result of these lengthy meetings, at which the Sub-Committee usually only ever considered one application at a time, a number of Members had had to depart the meeting before a decision was taken. There were also some Members who felt unable to ask their questions, for fear of prolonging the meeting further. The whole driver for the guidance had been to ensure as many Sub-Committee Members as possible were provided with a fair opportunity to contribute to the debate and the decision.

The Chairman highlighted that he had said in his email that “if there are exceptional circumstances, I will always take a pragmatic and inclusive approach ... if it is clear to me that more time is required, I will of course flex this framework as necessary”d. This proposal is not intended to be prescriptive but will hopefully help focus Members’ minds during the meeting an facilitate an open debate for all.” He said that beyond this, there was nothing prohibiting Members from asking any questions or points of clarification by email ahead of the meeting, and they were encouraged to do so.

The Chairman felt it was incumbent upon all chairs of every committee to manage the time effectively, to make rulings on issues of repetition and to ensure that all parties are given an opportunity to be heard, responsibilities he took seriously.

This guidance had been drafted with considerable input from the Planning, Comptroller & City Solicitors and Governance Teams. The Chairman thought that it struck the right balance between allowing Members to ask questions at the meeting, whilst ensuring that as many committee Members as possible were still present to participate in the decision. It also concurred with the City Corporation’s Planning Protocol and Standing Orders.

The Chairman noted that the officers from the Planning team were responsible for the City Corporation’s recent accolades of Planning Authority of the Year and National Planning Permission of the Year, and so did not agree with the suggestion that his approach would be damaging the City’s reputation as a Planning Authority. It was the ability to determine often complex applications expeditiously, whilst giving thorough consideration to the issues, that has led to the City Corporation’s professional reputation and prestigious standing within the Planning community. It also reflected the new Government’s desire to make planning more effective.

The Chairman concluded by saying that there had not been a single meeting of the sub-committee since he had issued the guidance. He was open to feedback and would be seeking constructive reflections from all parties following our next meeting. Some Members had already written back in support.

Mr Mullally, as a supplementary question, asked the Chairman how he would explain this position to the electorate. In reply, the Chairman asked Mr Mullally to email him if there were any points that he felt had not addressed in the initial response.

17. Ballot
results

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

Where appropriate:-

**denotes appointed.*

(A) One Member to the Capital Buildings Board.

*Gregory Lawrence
Deputy Alastair Moss

Votes

30

48 *

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

Statutory Instruments

In Force

Financial Services and Markets Act 2023 (Commencement No. 7) Regulations

2 September 2024

Revokes certain of the instruments (or provisions) related to securitisation referred to in Schedule 1 to the Act. This includes revocation of Regulation (EU) 2017/2402 of the European Parliament and of the Council of 12 December 2017 regarding the general framework for securitisation, and of Delegated Regulation (EU) No 625/2014 of 13 March 2014 regarding technical standards.

Procurement Act 2023 (Commencement No. 3 and Transitional and Saving Provisions) (Amendment) Regulations 2024

17 September 2024

Delays the coming into force of the Act, so that provision start to come into force February 2025, rather than October 2024 as originally planned.

Read.

19. Resolutions There were no resolutions.

20. Awards and Prizes There was no report.

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

22. Exclusion of the public The public having been excluded during consideration of Item 9, all non-public items were considered prior to the re-admission of the public. The summary of the decisions taken are set out below.

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

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

24. **Policy and Resources Committee**
The Court considered a report of the Policy and Resources Committee concerning an acquisition.

This item was withdrawn with the approval of the Court.

25. **Finance Committee**

The Court considered and approved two reports of the Finance Committee, one concerning a contract for temporary labour and the other a catering contract at the Barbican Centre.

26. **City Bridge Foundation Board**

The Court considered and approved a report of the City Bridge Foundation Board concerning fire safety at Tower Bridge.

27. **City Of London Police Authority Board**

The Court considered and approved a report of the City of London Police Authority Board concerning cryptocurrency storage.

The meeting commenced at 13.00 and ended at 2.48 pm

THOMAS.

Report – Policy and Resources Committee

Bill for an Act of Common Council – Annual Election of Ward Beadles

To be presented on Thursday, 5th December 2024

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

SUMMARY

The accompanying Bill is intended to address issues associated with the existing overlap of Aldermanic and Beadle terms of office, which have arisen following the relatively recent change from annual to four-year terms for Beadles

In order to effect the proposed change of a reversion to prior arrangements, a Bill for an Act of Common Council is required. The effect of the Bill would be to return to the long-standing practice of Ward Beadles being elected on an annual cycle once again, in order to address some of the unanticipated practical concerns that have materialised since the change. In accordance with Standing Order No. 46, the terms of the Bill must be considered by the appropriate Committee(s) and must be submitted to the Recorder of London for settling prior to its submission to the Court of Common Council for its first, second and third reading.

Your Policy and Resources Committee agreed to progress this matter at its meeting in October 2024. The draft Bill at Appendix 1 has since been settled by the Recorder and is now presented for its first and second readings and, if approved, would be presented for a third and final reading in January 2025, so as to take effect for any Annual Wardmotes from March 2025 onwards.

RECOMMENDATION(s)

Approval be given to:-

1. Proposals around a reversion to the prior arrangements whereby Beadles are once again elected annually.
2. The draft Bill for an Act of Common Council to effect this change, as set out in Appendix 1 to this report.

MAIN REPORT

Background

1. At its meeting on 19 March 2024, the General Purposes Committee of Aldermen considered a report in relation to the roles of Ward Beadles and Honorary Ward Clerks and how these might both be better regularised going forward. One of the specific resolutions arising from this meeting was that Officers be instructed to seek an Act of Common Council to revert to the annual election of Ward Beadles in order to provide the opportunity to address various issues arising from the overlap of Aldermanic and Beadle terms of office that exists at present.
2. The role of Ward Beadle is one of the oldest elected offices in the City, with references to them found at least as early as the end of the 13th century. These show that their duties in the Middle Ages included the maintenance of public order, in which they worked with the constable and the watch, and the safeguarding of public morality. The role has consistently been closely connected to that of the Ward Alderman, supporting them in the discharge of their duties. The Ward at this date was practically a self-contained unit for many purposes and possessed its own officers, for whom it was responsible for the remuneration thereof. The Ward Beadles were elected by the Wardmotes and their names, with those of the Common Councillors and other officers, were sent in annually in the Ward presentments.
3. An Act of Common Council for the Election of Beadles was passed on 10 October 1663 and has subsequently been amended several times. This speaks of the Beadle as 'an ancient Office in every Ward of the City, and very useful to the Alderman for the Common Business and Affairs of the Ward...' It goes on to refer to recent elections of 'very unfit Persons' and to remedy the situation ordains that the Alderman, with the consent of the Deputy and the Common Councilmen or the major part of them, should nominate 'one or more honest, sufficient and discreet person or persons' for election at the wardmote.
4. In a report to the Special Sub Police Committee in 1947 the (Acting) Comptroller and City Solicitor and the Deputy Keeper of the Records advised that the City Corporation had never regulated the duties of the Ward Beadles and had no power to do so, the Beadles being responsible primarily to their Aldermen and the ward electors. A list of duties had been compiled in 1841 but it was emphasised that these were not duties fixed by the City Corporation but were 'a list of what appear to be more particularly the duties of that officer'.
5. When the Town Clerk wrote to a Ward Clerk on the subject in 1964, he emphasised that the Beadles were responsible primarily to their Aldermen and the Ward electors - 'It is generally assumed that while certain duties are obligatory, there are many others that cannot be specified in exact terms, some being of a domestic nature which spring from a spirit of co-operation between the Ward Officers'.
6. Beadles were previously expected to attend all meetings of the Court of Aldermen, as well as various other occasions. Today, attendance is broadly

restricted to Wardmotes, Common Hall, the Admission ceremonies for the Sheriffs and Lord Mayor, the Lord Mayor's Show, and various church services.

Current Position

7. From the above, it is evident that Ward Beadles are elected officers of the Ward, not employees nor appointments of the Corporation or of the Alderman (albeit, intrinsically linked particularly with the latter). As previously explained, the elections of Ward Beadles are governed by Acts of Common Council, most recently through the Act of 17 January 2013.
8. Equally, it is clear that, whilst there is no formal role description, there is a set of understood roles and functions which have evolved over time. Historic aspects relating to electoral functions now rest with the Town Clerk as Ward Clerk, through the Electoral Services office; the function is, therefore, now essentially limited to opening and closing the Wardmote, and attending on the Alderman at such ceremonial occasions as may be required.
9. The role being a ceremonial one, a connection and effective working relationship between the Alderman and Beadle is highly desirable. This is reinforced not only by the historic nature of the role, but particularly through the electoral arrangements: it is the Alderman, and only the Alderman, who may nominate candidates for election as Beadle. Thus, whilst the role is technically elected, it is in essence more akin to an appointment than might, on face value, be appreciated.
10. Until 2005, elections for Beadles were undertaken annually at Wardmotes, commensurate with arrangements for electing Common Councillors. Following change to the latter, the position was also changed for Ward Beadles by way of Act of Common Council, and elections are now for four-year terms. This can and has, however, led to occasions of some disconnect between individual Beadles and Aldermen, particularly where the incumbent of the latter office changes.
11. As Aldermanic elections are on a six-year cycle, with the added consideration of retirement at age 75, it can now be the case that there is a prolonged period for which a new Alderman is supported by a Beadle whom they have not personally nominated. This has raised the complementary query of how an Alderman is able to exercise oversight over the role, in keeping with the aforementioned exercise by the Court in this area in centuries past.
12. For the sake of clarity, the choice as to the appointment of a casual replacement, should it be required, rests solely with the Alderman (as provided by the Act of Common Council of 17 January 2013).

Proposal

13. A reversion to the prior arrangements whereby Beadles were elected annually is proposed, as it would provide greater discretion to achieve change more expeditiously if required where, for instance, there is a change of Alderman or there are concerns over the conduct of an incumbent Beadle. It would also bring the role back into alignment with the other Ward Officer role, that of the Honorary Ward Clerk, which is appointed annually.

14. The proposal requires a new Bill for an Act of Common Council (Appendix 1) to amend section 1 of the Act of Common Council of 17 January 2013 (Appendix 2). In consultation with the Remembrancer, the Comptroller and City Solicitor has also taken the opportunity in the latest Bill to update and simplify some of the more dated terminology used in previous Acts of Common Council.
15. In accordance with Standing Order 46, the Bill has been settled by the Recorder of London. It is anticipated that the Bill will be read a first and second time at the Court of Common Council on 5 December 2024, and read a third time and made an Act of Common Council at the following meeting on 9 January 2025, so that the new arrangements are in force in time for the elections in March 2025.

Conclusion

16. The position of Ward Beadle is an important ceremonial office tied to the delivery of Ward business and, in particular, the support of the Alderman. Changes to the electoral procedure for Ward Beadles, to see these return to an annual cycle, is considered advantageous. This would need to be achieved by an Act of Common Council and a draft Bill is therefore appended here for your approval.

Appendices

- Appendix 1 – Draft Bill for an Act of Common Council
- Appendix 2 – Act of Common Council of 17 January 2013

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

DATED this 17th day of October 2024.

SIGNED on behalf of the Committee.

Deputy Christopher Michael Hayward
Chairman, Policy and Resources Committee

To be considered at the Court of Common Council

2024

A BILL

For an Act of Common Council to –

Revert to the annual election of Ward Beadles.

WHEREAS:-

- (1) From time immemorial there has existed and still exists in the City of London (“the City”) a Common Council consisting of the Lord Mayor, Aldermen and Commons in Common Council assembled (“the Common Council”) which has made such Acts, Ordinances, Rules, Orders and Regulations for the regulation and good government of the City and its Liberties as it has from time to time found necessary and expedient;
- (2) From at least 1663, until 2005, Common Councilmen and Ward Beadles were elected annually at the same Wardmotes, and on several occasions Acts of Common Council were passed to ensure that the dates of those elections continued to take place on the same dates;
- (3) With effect from 2005, Common Councilmen were elected every four years, and further Acts of Common Council were passed to ensure that the elections of Common Councilmen and Ward Beadles continued to coincide;
- (4) By an Act of Common Council of 17 January 2013 it was enacted that elections of Ward Beadles would take place on the same date as ordinary ward elections in relation to the whole number of Common Councilmen, as determined in accordance with the provisions of the Act of Common Council of 13 September 2012 or any other Act of Common Council from time to time amending or replacing it;
- (5) It is expedient that elections of Ward Beadles should revert to an annual cycle, so that there is a more frequent opportunity for the Alderman of each Ward to put forward one or more candidates of their choice for nomination;
- (6) His late Majesty King Edward the Third by his Charter made and granted to the City in the fifteenth year of his reign afterwards confirmed and ratified by Parliament did (amongst other things) grant that if any existing customs in the City were in any part hard or defective or any things in the City newly arising in which no remedy had been ordained should need amendment the Mayor and Aldermen of the City and their successors with the assent of the Commonalty of the City might ordain fit remedy as often as it should seem expedient to them so that such ordinance should be profitable to the King and to the citizens and to all other liege subjects resorting to the City and agreeable also to reason and good faith.

IT IS THEREFORE ENACTED by the Common Council **AS FOLLOWS:**

Elections of Ward Beadles

1. For section 1 of the Act of Common Council of 17 January 2013 substitute –

“1. (1) Subject to subsection (2), elections of Ward Beadles shall take place at the annual Wardmotes in March, on a date to be determined by each Alderman in respect of their own Ward.

(2) In any year in which ordinary ward elections in relation to the whole number of Common Councilmen are scheduled to take place, as determined in accordance with the provisions of the Act of Common Council made and passed on the 13th day of September 2012 or any other Act of Common Council from time to time amending or replacing it, elections of Ward Beadles shall take place on the same date as those ordinary ward elections.”

Commencement

2. The provisions of this Act will come into force on the day on which it is made and passed as an Act of Common Council.

GIFFORD, Mayor



A Court of Common Council holden in the Guildhall of the City of London on Thursday, the seventeenth day of January, 2013.

Act of Common Council to:-

Change the date of the elections of Ward Beadles;

Make incidental and consequential changes to the term of office of Ward Beadles;

Provide that any casual vacancy occurring in the office of Ward Beadle shall be filled by the Alderman of the ward in which the vacancy occurs;

Repeal the Act of Common Council made and passed on the 4th day of December 2003.

WHEREAS:-

- (1) From time immemorial there has existed and still exists in the City of London (“the City”) a Common Council consisting of the Lord Mayor, Aldermen and Commons in Common Council assembled and the Common Council have made, passed, ordained and established divers Acts, Ordinances, Rules, Orders and Regulations for the regulation and good government of the City and its Liberties as to them from time to time has been found necessary and expedient;
- (2) By an Act of Common Council made and passed on the 4th day of December 2003 it was enacted that as from the coming into force of that Act the elections of Ward Beadles shall take place on the second Friday of March in every fourth year after 2005, which at that time coincided with the date of ordinary ward elections in relation to the whole number of Common Councilmen;
- (3) By an Act of Common Council made and passed on the 13th day of September 2012 it was enacted that ordinary ward elections in relation to the whole number of Common Councilmen shall take place on a date to be determined in accordance with the provisions of that Act;
- (4) It is desirable that the elections of Ward Beadles should continue to take place on the same date as ordinary ward elections in relation to the whole number of Common Councilmen;
- (5) It is desirable to make certain incidental and consequential changes to the term of office of Ward Beadles;

- (6) It is also desirable that the Aldermen of the several wards in the City should continue to be authorised to fill by appointment any casual vacancies occurring in the office of Ward Beadle in their respective wards;
- (7) His late Majesty King Edward the Third by his Charter made and granted to the City in the fifteenth year of his reign afterwards confirmed and ratified by Parliament did (amongst other things) grant that if any customs in the City before that time obtained and used were in any part hard or defective or any things in the City newly arising in which no remedy had been ordained should need amendment the Mayor and Aldermen of the City and their successors with the assent of the Commonalty of the City might put and ordain thereto fit remedy as often as it should seem expedient to them so that such ordinance should be profitable to the King and to the citizens and to all other liege subjects resorting to the City and agreeable also to reason and good faith.

BE IT THEREFORE and IT IS HEREBY ENACTED ORDAINED AND ESTABLISHED by the Right Honourable the Lord Mayor, the Right Worshipful the Aldermen and the Commons of the City of London in Common Council assembled and the authority of the same **AS FOLLOWS:**

Elections of Ward Beadles

1. Elections of Ward Beadles shall take place on the same date as ordinary ward elections in relation to the whole number of Common Councilmen, as determined in accordance with the provisions of the Act of Common Council made and passed on the 13th day of September 2012 or any other Act of Common Council from time to time amending or replacing the same.

Term of office of Ward Beadles

2. (1) Subject to subsections (2) and (3) any Ward Beadle shall, unless he resigns his office or it otherwise becomes vacant, cease to hold office on the election of his successor, who shall hold office from that point.
 - (2) The Alderman of the Ward may instead direct that a Ward Beadle shall cease to hold office at some later point in the Wardmote at which his successor is elected, or on the closing of the said Wardmote, in which case his successor shall hold office from that later point.
 - (3) If no successor to a Ward Beadle is elected at a Wardmote held in accordance with section 1, that Ward Beadle shall cease to hold office on the closing of the said Wardmote.

Casual vacancies in the office of Ward Beadle

3. On a casual vacancy occurring in the office of Ward Beadle, the vacancy shall be filled by appointment by the Alderman of the Ward in which the vacancy has occurred.

Repeal

4. The Act of Common Council made and passed on the 4th day of December 2003 is hereby repealed (except in relation to its repeal of certain provisions of Acts of Common Council made and passed on the 14th day of June 1984 and the 10th day of October 2002 respectively).

Commencement

5. The provisions of this Act shall come into force on the day on which it is made and passed as an Act of Common Council.

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Report – Policy and Resources Committee

Modern Slavery Statement 2024-29

To be presented on Thursday, 5th December 2024

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

SUMMARY

This report presents for approval a refreshed Modern Slavery Statement made pursuant to Section 54 of the Modern Slavery Act 2015.

The statement continues the work laid out in the 2018 and 2021 statements, outlining the steps that the City of London Corporation has taken and is continuing to take to ensure that modern slavery is not taking place within the organisation, within the Square Mile or within our supply chains.

RECOMMENDATION

That Members:

- Approve the Modern Slavery Statement 2024-2029 (Appendix 1).
- Approve the publication of the statement both on the City Corporation website and the HM Government's Modern Slavery Statement registry.

Main Report

Background

1. The Modern Slavery Statement is made in response to Section 54 of the Modern Slavery Act 2015 ('the Act').
2. The City Corporation was not a relevant commercial organisation as defined by section 54 of the Act, however, in November 2018, Policy and Resources Committee signed off the City Corporation's Modern Slavery Statement. This decision aligns with our dedication to responsible business principles and demonstrates our commitment to due diligence and transparency.
3. Members approved the first City Corporation Modern Slavery Statement in 2018. This brought together the roles, remits, commitments, and all work undertaken to tackle modern slavery and human trafficking across the organisation. This contained an ambition to publish a Modern Slavery Statement on an annual basis and set in motion a number of initiatives – e.g., a City of London Corporation Modern Slavery Working Group.

4. The City Corporation has published a subsequent Modern Slavery Statement since by way of an update in 2021.
5. Due to disruption caused by the outbreak of COVID-19 with subsequent resourcing pressures, the ability to keep an updated, annual publication of a Modern Slavery Statement has not been met.

Current Position

6. In 2023, an internal review was conducted to ascertain how we can improve on our efforts to combat modern slavery. Recommendations have been taken forward to relevant Department leads and incorporated within this statement.
7. The Deputy Town Clerk (DTC) has been nominated by the Town Clerk as Corporate Lead for the City Corporation's Modern Slavery Statement. Moving forward, the Deputy Town Clerk will be supported by a Modern Slavery Strategic Lead, to help coordinate delivery of contributing officers across the City Corporation.
8. The statement has been drafted in consultation with City of London Police, Department for Children and Community Services, Port Health and Public Protection, People and Human Resources, Corporate Strategy and Performance, Town Clerk's Department, Commercial, Change, and Portfolio Management team in the Chamberlain's Department and officers from the City Bridge Foundation.
9. It is intended that this Statement will be valid for the period from 2024-2029, in line with our Corporate Plan and People Strategy, with any required textual changes to be updated annually. The City Corporation's efforts to combat modern slavery will be reflected in respective Departmental and Institutional reporting.

Proposals

10. Members are asked to approve the Modern Slavery Statement and approve its publication on both the City Corporation website and HM Government's Modern Slavery Statement registry.

Corporate & Strategic Implications

Strategic implications – Though this statement principally supports our Corporate Plan 2024-2029 ambition to Provide Excellent Services, all six outcomes are interlinked and strive for equity, equality, diversity and inclusion to ensure impactful delivery of services.

Financial implications – None.

Resource implications – Work on modern slavery has already been established and is being delivered by the relevant Departments and Teams. This paper does not request any changes to the level of resources allocated to tackle modern slavery.

Legal implications – The City of London Corporation is under no legal duty to produce a Modern Slavery Statement at this time.

Risk implications – None.

Equalities implications – Work to tackle modern slavery and, as relevant to the functions being discharged by the City Corporation, Equalities Impact Assessments would be completed by teams undertaking work to ensure proper consideration of equalities implications.

Conclusion

11. The City of London Corporation acknowledges its responsibility to identify and eradicate modern slavery within its operations. This Statement demonstrates the City Corporation's comprehensive and ongoing commitment to preventing modern slavery in all aspects of our organisation, jurisdiction, and supply chains.

Appendices

- Appendix 1 – 2024-2029 Modern Slavery Statement (Full Statement, and Statement Summary)

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

DATED this 7th day of November 2024.

SIGNED on behalf of the Committee.

Deputy Christopher Michael Hayward
Chairman, Policy and Resources Committee

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City of London Corporation Modern Slavery Statement

1. At the City of London Corporation, we are committed to upholding the highest standards of ethical governance and transparency in our operations.
2. This Modern Slavery Statement continues the work laid out in our 2018 and 2021 statements, outlining the steps that the City of London Corporation ('City Corporation') has taken and is continuing to take to ensure that modern slavery is not taking place within our organisation, within the Square Mile, or within our supply chains.
3. This Modern Slavery Statement is made pursuant to Section 54 of the [Modern Slavery Act 2015 \('the Act'\)](#). Although the City Corporation is not classified as a relevant commercial organisation under Section 54 of the Act, we have made a clear commitment to publish a Modern Slavery Statement to align with our dedication to responsible business.
4. For the purposes of this Statement and associated Policy, the term 'Modern Slavery' encompasses slavery, servitude, human trafficking, forced or compulsory labour and child labour.
5. This Modern Slavery Statement sets out the steps the City Corporation is taking in a) discharging its functions to ensure that modern slavery is not taking place in its business, jurisdiction or supply chains, and b) to use its wider influence to reduce modern slavery risks and impacts. It is divided into three sections:

Part 1: Our Organisation - Prioritising our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.

Part 2: Our Jurisdiction - Minimising the risk of modern slavery occurring in the City of London and on City Corporation property, referring any victims to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence.

Part 3: Our Supply Chains - Using responsible procurement and rigorous contract management to mitigate the risk of modern slavery taking place within our UK supply chain, and effective due diligence procedures to minimise the risks of using global suppliers who contravene human and labour rights and exploit people through modern slavery.

Part 1: Our Organisation

6. This Section outlines how the City Corporation prioritises our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.
7. It is intended this Statement will be valid for the period from 2024-2029 in line with our Corporate Plan and People Strategy, with any required textual changes to be updated annually. Our efforts to combat modern slavery will be reflected in respective Departmental and Institutional reporting.

The City of London Corporation

8. The City Corporation has a long history, a unique constitution, our own Lord Mayor, and a dedicated police service keeping the City safe.
9. The City of London Corporation looks after the City of London ('the City' or 'Square Mile') on behalf of all who live, study, work, and visit; providing modern, efficient, and high-quality local services and policing for all.
10. Aside from acting as a key spokesperson for the UK's Financial and Professional Services sector, we support London's communities through responsible business, as the corporate Trustee of a number of charities, including City Bridge Foundation, providing schools and skills for young people, and delivering affordable housing across London.
11. Beyond the City boundaries, our organisation's responsibilities to providing a host of additional facilities for the benefit of the nation including air and seaports, charitable giving, the Guildhall School of Musica and Drama, the Barbican Centre and over 11,00 acres of open spaces.

Our Corporate Plan 2024-2029

12. Our commitment to ensure that the City of London offers the best place to live, work, learn, and explore is guided by our core policy framework. Launched in April 2024, our [Corporate Plan 2024-2029](#) guides planning and decision-making for the City of London Corporation through six strategic outcomes, reflecting the vast portfolios covered by the City of London Corporation.
13. The six Corporate Plan outcomes are as follows:
 - [Vibrant Thriving Destination](#) — Attracting businesses and people to a safe, secure, and dynamic location is vital to our future. A world-leading culture and leisure offer is integral to creating a vibrant, thriving destination where everyone prospers.

- [Providing Excellent Services](#) — Supporting people to live healthy, independent lives and achieve their ambitions is dependent on excellent services. Vital to that continued pursuit is enabling access to effective adult and children’s social care, outstanding education, lifelong learning, quality housing, and combatting homelessness.
- [Diverse Engaged Communities](#) — Across our residents, workers, businesses, and visitors, everyone should feel that they belong. Connecting people of all ages and backgrounds will help build diverse, engaged communities that are involved in co-creating great services and outcomes.
- [Dynamic Economic Growth](#) — The City of London is the engine in the country’s economy. Driving dynamic economic growth in financial and professional services at local, national, and international levels will create jobs, attract investment, and support businesses across communities and the country.
- [Leading Sustainable Environment](#) — We have a responsibility to ensure that we act as a leader on environmental sustainability and strive to enhance it in all aspects of how we work. Climate action, resilience, air quality, and sustainability are all facets of ambitious targets for the entire City to be net zero by 2040.
- [Flourishing Public Spaces](#) — From our markets and cultural icons, such as the Barbican, to our world-famous bridges and amazing green spaces, we are stewards of unique national assets. Major capital investment into our civic fabric will secure flourishing public spaces, enabling a more successful London overall.

14. Though this statement principally supports our ambition to Provide Excellent Services, all six outcomes are interlinked and delivered through activities across the organisation and in partnership with our stakeholders to ensure impactful delivery of services.

People Strategy 2024-2029

15. Launched in parallel with our Corporate Plan, our [People Strategy 2024-2029](#) works to enable the City Corporation to become a world-class organisation. It does so by creating a culture that encourages excellent performance and embeds equality, equity, diversity, inclusion, and health and safety in everything we do.
16. Our People Strategy emphasizes a key theme of *‘My Wellbeing and Belonging’* where we outline our work to ensure our people feel physically and psychologically. It outlines specific measures to support our staff in this regard which include but not limited to:
- Introduce an anonymous HR reporting system and process to investigate and resolve employee complaints

- Research, benchmark and implement a holistic and proactive wellbeing offer to create consistent conditions for our people to flourish
- Undertake an annual employee survey, creating collective and individual action plans and connecting these directly to future year people strategy initiatives.

Our People, Our Policies and Our Commitments

17. Underpinning our People Strategy, the City Corporation has a suite of policies, codes of conduct and adopted principles that set out how the organisation makes sure that people are working legally, that everyone is treated fairly and with dignity, and that people conduct themselves appropriately.
18. These policies and processes are managed and overseen by the People and Human Resources Department and guidance is provided to all recruiting managers to ensure these checks are carried out effectively.
19. They represent an initial measure of safeguarding against the City Corporation employing any individual that has been illegally trafficked and or is being forced to work against their will – they include:
 - **Recruitment Policy:** The City Corporation enforces a strict recruitment policy, including mandatory 'right to work in the UK' checks for all employees. Employment offers are conditional on satisfactory completion of these checks. For employees on a visa or work permit, continued employment requires proof of ongoing right to live and work in the UK. These processes, overseen by the People and Human Resources Department, are designed to prevent the illegal employment of trafficked or coerced individuals.
 - **Whistleblowing Policy:** The City Corporation's Whistleblowing Policy applies to all staff, offering clear channels to raise serious concerns without fear of reprisal. This includes reporting potential instances of modern slavery or other forms of abuse and coercion. Staff are informed of this policy through induction training and the staff intranet.
 - **Employee Assistance Programme:** The City Corporation has an Employee Assistance Programme, which operates 24/7 for 365 days of the year, to provide staff and their partner or a family member confidential support on a wide range of work and personal issues which may include cases of modern slavery.
 - **Learning and Development Programs:** People and Human Resources ensures easy access to HR policies via the Employee Handbook, HR Topics pages, Managers' Guide, and New Starters' Resource on the intranet. Changes or new policies are communicated through training workshops, e-learning, team meetings, and staff/manager news updates. The City Corporation also offers a one-hour e-learning course on modern slavery to raise awareness and help staff and Members identify and report concerns.

- **Our Living Wage Commitment:** The City Corporation is proud to be an accredited Living Wage employer. This commits us to paying at least the Living Wage to all staff, contractors and subcontractors according to the parameters set by the Living Wage Foundation. The City Corporation also goes one step further by paying the Living Wage to all apprentices and interns, as well as any person working under any of our contracts for two or more hours.
- **Codes of Conduct:** Our success depends on public trust, so all staff and elected representatives must uphold the highest standards of conduct and integrity, including adherence to the Nolan Principles. The City Corporation's 100 Common Councilmen and 25 Aldermen, known as 'Members,' represent public interests and follow the City Corporation's Code of Conduct.

Similarly, employees must follow the Employee Code of Conduct, which includes anti-corruption measures and promotes fairness and equality. Employees, suppliers, and stakeholders are encouraged to report serious concerns, which are addressed under the Whistleblowing or Complaints Policy, the Public Interest Disclosure Act, the Human Rights Act, and, when relevant, the Anti-Fraud and Corruption Strategy.

Governance & Accountability

20. The City of London Corporation operates under a historic and distinct governance system. Corporate oversight and governance are principally conducted through a committee system, each responsible for oversight and accountability for given remits. Meanwhile, the City Corporation's Town Clerk and Chief Executive, with respective Chief Officers, oversee day-to-day operations and delivery.
21. The primary Member-led bodies with responsibility for services which work towards preventing modern slavery are as follows:
 - **Court of Common Council** — With 100 elected Common Councillors and 25 Alderman, the Court of Common Council serves as the principal decision-making body.
 - **Policy and Resources Committee** — Oversees governance and considering matters of policy and strategic importance to the City of London Corporation including matters referred to it by other Committees and/or Chief Officers. It directs economic development initiatives and promotes the City of London as a global financial hub.
 - **City of London Police Authority Board** — Delegated by the Court of Common Council, the Board ensures the City of London Police operates effectively, holds the Commissioner accountable, and sets priorities that enhance community safety and protection.

- **Community & Children's Services Committee** — Manages Children's and Adults' Services, Education, and Social Services, overseeing care and support to promote the safety and well-being of residents and addressing issues related to safeguarding and care.
- **Corporate Services Committee** — Oversees personnel and staffing for the City of London Corporation, including all graded and non-graded employees, employees on the professional payrolls, staff, and including casual workers, across Corporation departments and Institutions. They ensure employment practices support the well-being of staff and uphold best practice.
- **Licensing Committee** — This Committee manages the City of London's licensing under the Licensing Act 2003 with several key objectives, including: preventing crime and disorder, ensuring public safety, preventing public nuisance, and protecting children from harm.

Continuous Improvement and Progress

22. A Corporate Plan and People Strategy have been launched – each with clear outcomes designed to embed equality, equity, diversity, inclusion across our organisation and enable impactful delivery of services.
23. In 2023, an internal review was conducted to ascertain how we can improve on our efforts to combat modern slavery. Recommendations have been taken forward to relevant Department leads and incorporated within this statement.
24. The Deputy Town Clerk (DTC) has been put forward by the Town Clerk's Executive Leadership Board as Corporate Lead. for the Corporation's Modern Slavery Statement, to be supported by a Modern Slavery Strategic Lead, to help coordinate delivery of our Modern Slavery Statement. This will give corporate oversight and support in the publication of our Modern Slavery Statement commitments.
25. This statement is a product of continued collaboration through members of the CoLC Modern Slavery Working Group.

Part 2: Our Jurisdiction

26. This Section outlines how the City Corporation minimizes the risk of modern slavery occurring in the City of London and on City Corporation property, referring any victims to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence.

The Safer City Partnership Board

27. The City Corporation takes a collaborative approach across all our service departments and multi-agency partners to ensure that comprehensive support is available to protect children, families, and adults from harm and exploitation.

28. Much of this comes together through the [Safer City Partnership Board](#) – the statutory community safety partnership for the City of London. It brings together statutory agencies, known as the Responsible Authorities, and invited and co-opted participants with the role of keeping the Square Mile safe. The Responsible Authorities are as follows:

Responsible Authorities (Statutory Members)

- The City of London Corporation
- The City of London Police
- London Fire Brigade
- NHS North East London Integrated Care Board
- The National Probation Service – London

Invited and co-opted participants

- British Transport Police
- London Ambulance Service
- East London Foundation Trust
- The Guinness Partnership
- City and Hackney Public Health
- City and Hackney safeguarding Adults
- City and Hackney safeguarding children
- Victim Support
- City of London Crime Prevention Association
- Safer Business Network
- City of London Business Improvement Districts

The City of London Police (CoLP)

29. The City of London Police's action plan on Modern Slavery and Organised Immigration Crime uses a four-pronged approach based on **protection, preparation, prevention** and **pursuit**:

- **Protection** focuses on identifying and safeguarding victims. This includes providing support services, such as shelter and medical care, and connecting victims to the National Referral Mechanism (NRM). The police work closely with other agencies to remove individuals from harmful situations and prevent further exploitation.
- **Preparation** involves training officers to recognise signs of modern slavery and exploitation. The plan also strengthens partnerships with local authorities, businesses, and

other organisations to enhance intelligence gathering and improve the police's ability to respond effectively to these crimes.

- **Prevention** aims to reduce the occurrence of these crimes by raising public awareness and working with businesses to prevent exploitation within supply chains. Additionally, the police collaborate with at-risk communities to provide support and create a hostile environment for organised crime groups (OCGs).
 - **Pursuit** focuses on investigating, prosecuting, and disrupting offenders and OCGs involved in modern slavery and organised immigration crime. This includes targeting the financial operations of criminal networks and working with national and international partners to dismantle these organisations.
- 30.** Due to the nature of the crime, many victims are hidden out of sight, may not know they are victims, and/or may not present as a victim initially. Outside of exploring the data of those victims managed under National Referral Mechanism or direct reports into Police it difficult to accurately quantify the true scale of this crime. Beyond those sources mentioned there is no definitive data source or method to accurately capture the number of victims in the UK, including the Square Mile, therefore there is a high reliance on the creation of opportunities for generation of community and wider intelligence. CoLP are committed resources to assist in developing intelligence in this way to better understand the threat , harm and risk picture within the Square Mile.
- 31.** The City of London Police are focused on continuous improvement of data quality recorded, specifically around nationality of victims and suspects, location of offence and dates of exploitation to assist in generating opportunities and activity for prevention and pursuit of offenders. This includes seeking to gain licenses for CoLP for the Traffik Analysis Hub - run by [Stop the Traffik](#) - to develop our overall intelligence picture locally, regionally and nationally.
- 32.** In addition, the CoLP supports the Modern Slavery and Organised Immigration Crime (MSOIC) Programme, which focuses on identifying and protecting victims, preventing reoffending, disrupting criminal activities, and breaking the business models of Organised Crime Gangs (OCGs).

The Department of Community and Children's Services (DCCS)

- 33.** DCCS has a wide remit to provide care and support to the 8,600 residential and 614,500 worker population of the City of London. Within DCCS, the People's Department provides comprehensive, consent-based and statutory safeguarding services for all City residents – covering Adult's Social Care, Children's Social Care and Early Help, Homelessness and Rough Sleeping, and Safeguarding & Quality Assurance.

34. Their work is guided by statutory regulations and legislation. For modern slavery, this includes the [Modern Slavery Act 2015](#) and its accompanying statutory guidance. This framework is further supported by broader safeguarding laws, including the [Children Act 2004](#), [Care Act 2014](#), and the [Homelessness Code of Guidance for local authorities](#). Plus wider multi-agency partnership safeguarding strategies such as the [CHSAB Strategy 2020-2025](#).
35. When significant harm or modern slavery is identified, the department takes immediate action to remove individuals from danger, safeguard them, and provide services to address trauma and prevent recurrence. The department refers cases of exploitation and trafficking to the [National Referral Mechanism \(NRM\)](#) through our dedicated Single Point of Contact.
36. This response is coordinated with partner agencies to create a robust support network around victims, providing immediate support, including emergency accommodation, and raising awareness among partners and staff to recognise and act on indicators of exploitation. In all cases, the safety of victims pursuing prosecution is prioritised, recognising the risks posed by exploiters.
37. The [Multi-Agency Child Exploitation \(MACE\) Group](#), chaired by the Head of Children's Social Care and attended by multi-agency partners, meets regularly to monitor issues such as criminal and sexual exploitation, trafficking, gangs, county lines, and modern slavery. This group ensures that trends are understood, and appropriate responses are in place to support victims and disrupt exploiters. Additionally, street-based outreach services provide direct, location-based support to homeless individuals, offering immediate advice and referrals to services.
38. [City Corporation Early Help](#) services are readily available to children and families to address emerging needs and prevent the escalation of vulnerabilities. This includes a universal youth service that encourages participation in extracurricular activities, reduces social isolation, and provides safe community spaces for children.
39. The City Corporation also has a dedicated commissioning team within the Community & Children's Services department, particularly for vulnerable young people, such as care leavers, and vulnerable adults. These services are regularly monitored to ensure safeguarding requirements are met. New services are commissioned using the City Corporation's minimum safeguarding standards, based on the expectations set by [The City & Hackney Safeguarding Children Partnership \(CHSCP\)](#). Due diligence procedures include Disclosure and Barring Service (DBS) checks, and reviews of safeguarding policies, procedures, and complaints, with providers' ability to meet these standards tested during the procurement process.

Port Health and Public Protection (PHPP)

40. PHPP teams provide comprehensive and effective environmental health, trading standards, air quality and licensing services for the City of London, ensuring that, through monitoring,

regulation and enforcement, City residents and businesses can enjoy an environment and services which are, so far as possible, safe and without risks to their health or welfare.

41. As per of their core duties, Public Protection officers frequently visit sites in the Square Mile posing risks of modern slavery and are vigilant in observing and reporting any suspicious circumstances.
42. Officers work closely with the City of London Police, Border Force, other external services – such as the Licensing Liaison Partnership - and other City Corporation services. Together, they collaborate on issues related to exploitation and modern slavery, with ongoing efforts focused on addressing concerns at specific locations.

Supporting Our Wider Community

43. [City Bridge Foundation](#) ('CBF' or 'the Charity') was established over 900 years ago and now manages and maintains five of London's city Bridges, at no cost to the taxpayer. They are powered through property and financial investments, initially supported and funded by medieval Londoners to maintain the first stone London Bridge. Funds surplus to the Bridges' needs are distributed each year to organisations that are working for a fairer, greener capital — via our funding team.
44. The City Corporation has a wider influence within surrounding boroughs, Greater London, the UK and further afield. We are committed to work together to ensure our approach to modern slavery is shared beyond our immediate jurisdiction.
45. Through our charitable funding, last year the charity provided £688,000 in grants specifically aimed at addressing modern slavery.
46. The City Corporation, acting by the Court of Common Council, is the charity trustee of CBF and carries out its functions as trustee in accordance with the City Corporation's internal governance framework, including through authority delegated to the CBF Board and its Committees, and to officers.
47. CBF's focus on Equity, Diversity, and Inclusion (EDI) supports initiatives that address conditions leading to exploitation and modern-day slavery. This includes funding and support for marginalized groups and those vulnerable to human trafficking. By promoting ethical treatment in supply chains and providing long-term, flexible finance for social change, CBF actively contributes to combatting modern-day slavery.
48. The Charity's vision, outcomes and values are set out in its overarching strategy 'Bridging London'. The vision is for London and Londoners to be truly connected. CBF aims to address the systemic causes that lead to modern slavery by supporting vulnerable populations, through its convening power and advocacy, and through collaborations and partnerships.

49. CBF will continue to evaluate its influence and collaborate with other funders and stakeholders to effectively tackle modern-day slavery.

50. [Heart of the City](#) runs a responsible business programme specifically designed for Small and Medium-sized Enterprises based in the UK to become a force for good. With the City of London Corporation having helped establish and fund Heart of the City, both share a commitment to fostering a sustainable and ethical business environment.

51. Focusing on the practical, its events, online resources/templates and network are designed to support those companies new to responsible business with complex issues, such as tackling modern slavery. Heart of the City's network of contributor companies has responsible business expertise and resource in-house and they provide foundation members with support, resources and guidance.

Continuous Improvement and Progress

52. The City of London Police, and the City of London Corporation more widely, continues to develop partnerships across the community and within policing to improve the identification and response to modern slavery.

53. Internal Service Development Plans, updated quarterly, drive practice improvements to enhance safeguarding responses, while the Children's Safeguarding Partnership and City and Hackney Adult's Safeguarding Board monitor and improve multi-agency safeguarding efforts.

54. In addition, regular performance monitoring and statutory reporting continue to ensure that services are delivered at the right time to meet the needs of City residents. These ongoing quality assurance measures, including practice reviews, observation, management oversight, and sign-off, monitor the day-to-day practice, impact, and user experience of our services.

55. Recognising the importance of appropriate training, a range of modern slavery, exploitation and human trafficking training is provided to workers in People's Services through our commissioned training providers.

56. For the City of London Police, this includes enhanced training for officers and staff around spotting the signs of exploitation, with a focus on areas which have limited information and/or intelligence, such as sexual and labour exploitation. This includes:

- All front-line officers and custody staff have now received modern slavery training inputs
- 14 officers have completed the four-day modern slavery investigator course
- 17 officers have completed the specialist modern slavery victim liaison course
- Staff from Learning and development have attended an MSOIC train the trainer course and the next cycle of vulnerability training in force will focus on MSOIC and delivered to all staff

- And new guidance has been issued for officers around a uniform way to record NRMs on across record systems at the City of London Police.
57. To ensure clear records across our services, Children’s and Adults’ Services operate a clear duty system to respond immediately to safety concerns, supplemented by an out-of-hours service. Here, Children’s Social Care and Early Help and Adult’s Social Care utilise the Mosaic ‘Warnings’ system, creating a red alert on the person summary page to notify any who access the record that there are warnings in place which indicate risk and high vulnerability across our service records.
 58. Children’s Social Care and the City of London Police are operating a collaborative project which ensures any child stopped and searched is seen through a safeguarding lens and accesses early, supportive, intervention, that diverts from risks and harm.
 59. CBF is expanding its responsible business practices to create a more positive impact by adding new roles focused on EDI and Climate Action. These roles will ensure a commitment to social justice, fostering an equitable, inclusive, and diverse environment that promotes ethical treatment in supply chains and works to prevent exploitation and forced labour.

Part 3: Our Supply Chains

60. The City Corporation spends around £151 million annually on goods and services, with an additional £292 million allocated to construction works. These contracts support a wide range of services across the City Corporation and its institutions, including the Barbican Centre, City of London Police, and City Bridge Foundation.
61. This Section outlines how the City Corporation is using responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within our domestic and global supply chains.

Our Domestic Supply Chains

62. The highest risks of modern slavery in our UK supply chain are found in entry-level roles across construction, security, waste management, cleaning, laundering, food harvesting, processing, and care industries—sectors typically filled by agency, seasonal, and migrant workers with low skill levels or without formal UK qualifications. Although not necessarily defined in the same way, the City Corporation recognises that those in the latter industries can often operate as part of the gig economy.

Our Global Supply Chains

63. Globally, the greatest risks, particularly forced and child labour, are linked to the production of electronics, textiles, agricultural commodities, and construction materials. Conflict minerals like gold, tin, tantalum, tungsten, lithium, cobalt, copper, and nickel—used in electronics and electric vehicles—are also a significant concern.

The Commercial, Change and Portfolio Management Team

64. The Commercial, Change, and Portfolio Management team oversees centralised and responsible procurement for contracts over £100,000, focusing on supplies, services, and works. This team leads the City Corporation's efforts to tackle modern slavery in supply chains, working with stakeholders and contract managers to mitigate risks and ensure best practices.

65. They monitor supplier performance and incorporate modern slavery and human rights safeguards throughout every stage of procurement. The team now includes an Impact and Reporting function to measure and communicate the value of investments, improving data and transparency.

Training and Development

66. All commercial services personnel receive responsible procurement induction and training from the Corporation's Responsible Procurement Manager. Responsible Procurement is also a module in our Commercial Academy, an e-learning course accessible to all City Corporation officers. This year (May – June 2024), a 'refresh' series was delivered, featuring sessions on each responsible procurement commitment with practical steps for implementation. The series was recorded and is available to officers.

67. Additionally, a toolkit has been developed for each of the six responsible procurement commitments. It explains the importance of each commitment, outlines actions for each stage of the commercial lifecycle (pre-procurement, procurement, and contract management), and provides relevant contacts for reporting.

Procurement Processes

68. Before starting a procurement exercise, our buying team assists departmental stakeholders in exploring procurement options. All relevant suppliers wishing to tender for City Corporation contracts must provide evidence of compliance with the Modern Slavery Act 2015 to be eligible.

69. Procurement frameworks, which include pre-approved suppliers with agreed terms and conditions for specific goods, works, or services, are another available option. As part of due diligence, our buying officers ensure that framework providers comply with the Modern Slavery Act, and address any gaps if necessary. For high-risk categories of spend, officers must include specific wording in specifications requiring suppliers to conduct due diligence

or be prepared to do so upon request. The Human Rights toolkit provides specification wording and questions for officers to include in their tenders.

Contract Monitoring

70. The City Corporation has made ambitious commitments to reducing carbon emissions through sustainable procurement, while also ensuring that the transition to a low-carbon economy does not marginalize people or violate human rights. To address this, the City Corporation has recruited temporary resources to specifically review 40 of our suppliers through a Just Transition lens and identify practical actions for both this year and the five-year action plan.
71. A framework, based on the [SDGs World Benchmarking Alliance Transition Methodology](#), and [International Labour Standards](#), was developed, followed by a risk assessment. For suppliers identified as high or medium risk, an action plan will be created, which may include supplier training, workshops, updates to the Human Rights toolkit, and revisions to procurement specifications and tender questions, as well as internal officer training.
72. To focus on modern slavery risks, we assessed the modern slavery statements of 40 of our top suppliers using the [Government's Modern Slavery Assessment Tool \(MSAT\)](#). Scores ranged from 31/156 to 151/156, with an average of 66/156. In the coming year, we will engage with suppliers to improve their approach to modern slavery through category training, one-on-one conversations, and collaboration with commercial leads.
73. Additionally, in early 2024, the Responsible Procurement team implemented a Modern Slavery in the Supply Chain Due Diligence Report, requiring suppliers to detail their due diligence efforts and planned actions for the specific financial year. This report has been used for major facilities management and minor works contracts.
74. A 'Performance Scorecard' is also available to contract managers to ensure a standardized and robust approach to monitoring, gathering evidence, and addressing risks or performance issues. One of the ten elements covered by the Scorecard is ethical sourcing, particularly supplier compliance with the Modern Slavery Act.

Continuous Improvement and Progress

75. The City Corporation helped establish and is an active member of the London Responsible Procurement Network (LRPN). This group of public sector representatives meets regularly to exchange best practices and develop strategies for social value, sustainability, and ethical sourcing. The group focuses on modern slavery, sharing interventions and learning how to address it in public sector supply chains. Their goal is to use their collective influence to reduce modern slavery and human rights risks, with efforts directed at improving training and due diligence.

- 76.** A comprehensive procurement governance review is underway, starting in summer 2024 and expected to run into 2025. This review will assess governance, practices, spending behaviours, and roles to improve efficiency and compliance. The review aims to strengthen the City Corporation's due diligence on human rights and modern slavery, with updates to procurement templates for high-risk areas. Expected outcomes include:
- A risk-assessed compliance audit
 - An improvement plan for procurement and contract management
 - A commercial assurance framework with updated data and reporting requirements
 - A corporate capability assessment and training plan
 - An updated Procurement Code
 - Revised officer-level governance proposals
- 77.** Officers are developing a new e-procurement system following the introduction of the [Procurement Act 2023](#), featuring contract management and alert functions. This system will integrate the current commercial scorecard and may be updated following the review. Led by the City Corporation's Strategic Contract Management Lead, this project will enhance visibility on responsible procurement and modern slavery issues.
- 78.** The temporary position on secondment from Westminster City Council, 'Responsible Procurement Officer – Just Transition', will engage with suppliers to improve their approach to modern slavery. The engagement will include category training, 1-2-1 conversations, and engagement with the commercial leads.
- 79.** In late 2023, the City Corporation's Commercial Service underwent an audit against the ISO 20400 standard for Sustainable Procurement. This audit reviewed our procurement policy, toolkits, templates, and the application of these resources by buyers and stakeholders. The City Corporation scored 2.73, which is above average for a first-time assessment. The standard emphasizes managing risks, addressing adverse sustainability impacts through due diligence, and promoting decent work and ethical behaviour as part of sustainable procurement.
- 80.** Additionally, the City Corporation was a founding partner for [Action Sustainability's Practical Procurement Guidance](#) aimed at combating modern slavery in solar PV supply chains. While this guidance focuses on solar panels, it is also applicable to other technologies with similar supply chain risks. We have shared this guidance through our category boards and climate action strategy team.

Policies and Commitments

81. The City Corporation has a suite of policies, toolkits and reporting commitments to promote responsible business and ensure we minimise risks of modern slavery taking place within our domestic and global supply chains.

- **City Corporation Responsible Procurement Policy:** Our [Responsible Procurement Policy](#) aims to deliver optimal value while enhancing the lives of those within our supply chain. It is founded on three pillars: social value, environmental sustainability, and ethical sourcing. This policy underscores our commitment to addressing human and labour rights violations, including modern slavery.

Applicable to all contracts awarded by the City Corporation, it requires action from officers with purchasing responsibilities and suppliers providing goods, services or works contracts. The City Corporation has six Responsible Procurement commitments, which includes a specific commitment to “*protect human rights in our supply chain by working with suppliers who undertake due diligence to guard against modern slavery and other human rights abuses.*”

- **Human Rights Toolkit:** Mitigating modern slavery and ensuring human rights in our supply chain are integral to our six responsible procurement commitments. Each commitment is supported by a dedicated toolkit that helps officers understand the risks, statutory duties, and considerations at each stage of the commercial lifecycle, including escalation procedures. The Human Rights toolkit provides links to valuable external resources, such as the Supply Chain Sustainability School and Government Commercial Colleges e-learning suite.
- **Oversight and Reporting:** We publish an annual report to assess the impact of our supply chain against our six responsible procurement commitments. The [Responsible Procurement Impact Report for the financial year 2023-24](#) is available on our website. Additionally, we will publish all six responsible procurement toolkits alongside our Responsible Procurement Policy on our website. These toolkits explain the importance of each commitment, outline steps for advancement, and set expectations for suppliers. Our aim in publishing these resources is to enhance supplier awareness, improve bid quality, and foster more meaningful discussions with our current suppliers.
- **Climate Action Strategy:** [Our Climate Action Strategy 2021–2027](#) ensures a Just Transition for the workforce, aiming to create decent work and quality jobs while safeguarding workers' rights and livelihoods.

- **Procurement Code:** Rules 45 (Responsible Procurement) and 50 (Modern Slavery and Human Rights) of our [Procurement Code](#) require officers to minimize ethical sourcing risks and uphold human rights within our supply chain.
 - **Contract Terms:** Our standard terms and conditions mandate contractor compliance with the Modern Slavery Act 2015 and reserve the right to terminate contracts for non-compliance.
 - **Fairtrade Commitment:** We adhere to [a Fairtrade Resolution](#), using Fairtrade products exclusively in the Guildhall Club and for City Corporation Hospitality Events, including 100% of products such as tea, coffee, sugar, bananas, and chocolate.
 - **UN Global Compact:** As a signatory to the [UN Global Compact](#), we integrate considerations for workers, communities, and the environment into our business decisions. Our commitments include Goal 8 (Decent Work and Economic Growth), ensuring International Labour Organisation standards are met, and Goal 12 (Responsible Consumption and Production), focusing on reducing waste and promoting reuse to mitigate modern slavery risks in mining and materials critical to climate action.
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This statement was approved by the City Corporation's Court of Common Council on **[DATE APPROVED]**

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2024-2029 Modern Slavery Statement Summary



Introduction

The City of London Corporation acknowledges its responsibility to identify and eradicate modern slavery within its operations.

Building on our previous statements, this document outlines the actions we have taken – *and continue to take* – to safeguard against any form of modern slavery occurring within **our organisation**, across **our jurisdiction**, and throughout **our supply chains**.

It is made pursuant to Section 54 of **the Modern Slavery Act 2015** ('the Act'). Although the City Corporation is not classified as a relevant commercial organisation under Section 54 of the Act, we made a clear commitment to publish a Modern Slavery Statement to align with our dedication to responsible business.

Part 1: Our Organisation

How we prioritise our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.

Core Policy Framework - Our commitment to ensure that the City of London offers the best place to live, work, learn, and explore is guided by our core policy framework of:

- **Our Corporate Plan 2024-2029:** All six outcomes of our Corporate Plan are and, through activities undertaken across the organisation and in partnership with our stakeholders, ensure impactful delivery of services.
- **Our People Strategy 2024-2029:** Working in parallel with our Corporate Plan, our People Strategy works to enable the City Corporation to become a world-class organisation by creating a culture that encourages excellent performance and embeds equality, equity, diversity, inclusion, and health and safety in everything we do.

Established Process, Policies and Commitments - We have committed to tackling modern slavery through an up-to-date suite of HR policies, including:

- Robust Committee Governance
- Recruitment Policy
- Whistleblowing Policy and Employee Assistance Programme
- Learning and Development Programmes
- Our Living Wage Commitment
- Codes of Conduct

Key Teams - The Town Clerk's Department, The People & Human Resources Department, Comptroller & City Solicitor's Department, Corporate Strategy & Performance.

Continuous Improvement and Progress.

- We have launched our Corporate Plan 2024-2029 and People Strategy 2024-2029 – each with clear outcomes to embed equality, equity, diversity, inclusion across our organisation with impactful delivery of services.
- We have conducted an internal review to ascertain how we can improve on our efforts to combat modern slavery. Recommendations have been taken forward to relevant Department leads and incorporated within this statement.
- To give corporate oversight, the Deputy Town Clerk has been appointed as Corporate Lead.
- We have continued collaboration through members of the CoLC Modern Slavery Working Group.

Part 2: Our Jurisdiction

How we minimise the risk of modern slavery occurring in any place the City Corporation has a presence, referring any victims to the help they need, and ensuring perpetrators are brought to justice.

Core Policy Framework - To combat modern slavery in our jurisdiction, we operate a clear approach outlined in:

- **Our City of London Policing Plan:** Outlines how policing will be delivered and sets out our policing priorities, whilst maintaining a commitment to our values of integrity, compassion and professionalism and the principles of the Police Code of Ethics.
- **National Legislation and Guidance:** Modern Slavery Act 2015, Modern Slavery Statutory Guidance, Children Act 2004, Care Act 2014, Homelessness Code of Guidance for local authorities, Licensing Act 2003, National Referral Mechanism (NRM) 2009.

Key Teams - City of London Police (CoLP), Department of Community & Children's Services (DCCS), Port Health & Public Protection (PHPP).

Continuous Improvement and Progress

- We conduct Internal Service Development Plans and ongoing quality assurance measures (including practice reviews, observation, management oversight, and sign-off) monitor the day-to-day practice, impact, and user experience of services and enhance safeguarding response.
- We have modern slavery, exploitation and human trafficking training available to officers and staff through our commissioned training providers.
- We have established arrangements to monitor the successful implementation of the Modern Slavery and Human Trafficking '4P' Plan.
- The CoLP continue to develop partnerships across the community and within policing to improve the identification and response to modern slavery.
- The Children's Social Care and the City of London Police have joined forces to ensure any child stopped and searched is seen through a safeguarding lens and accesses early, supportive, intervention, that diverts from risks and harm.

Established Process, Policies and Commitments - We ensure a collaborative and robust approach to modern slavery in our jurisdiction through:

- [The Safer City Partnership Board](#)
- [The Serious Organised Crime Board](#)
- [Our Multi-Agency Child Exploitation \(MACE\) Group](#)
- [City Corporation Early Help services](#)
- [The City & Hackney Safeguarding Children Board \(CHSCB\)](#)
- [CBF Bridging London Strategy](#)

Part 3: Our Supply Chains

How we use responsible procurement, contract management, and due diligence procedures to minimise risks of modern slavery taking place within our supply chains.

Core Policy Framework - Our commitment to responsible business is outlined and guided by our:

- **Responsible Procurement Policy:** Founded on three pillars: social value, environmental sustainability, and ethical sourcing. This policy underscores our commitment to addressing human and labour rights violations, including modern slavery.
- **Climate Action Strategy 2021-2027:** Ensures a Just Transition for the workforce, aiming to create decent work and quality jobs while safeguarding workers' rights and livelihoods.

Established Process, Policies and Commitments - We use robust processes, commitments and contract management to minimise the risk of modern slavery in our supply chains, including –

- Our Procurement Code: Rules 45 and 50
- Clear Contract Terms compliant with the Modern Slavery Act
- A dedicated Human Rights Toolkit for staff
- Annual Procurement Impact Reports
- Our City Corporation Fairtrade Resolution
- UN Global Compact signatory

Key Teams - The Chamberlain's Department - Commercial, Change, & Portfolio Management team.

Continuous Improvement and Progress

- The City Corporation has joined the newly formed London Responsible Procurement Network (LRPN) working group dedicated to modern slavery.
- The Commercial, Change, and Portfolio Management team has been created to better assess investment impact.
- A procurement governance review of the Commercial Service has begun to strengthen human rights and modern slavery due diligence throughout the commercial lifecycle.
- An Impact and Reporting function has been created to enhance transparency and measure the benefits of third-party spending and project investments, particularly in high-risk areas.
- An e-procurement system compliant with the new Procurement Act 2024 to provide the functionality to manage contracts through an e-system with alerts.
- The City Corporation will publish all six of our responsible procurement toolkits on our website alongside our Responsible Procurement Policy.
- Successful audit against the ISO 20400 standard for Sustainable Procurement.

Report – Port Health and Environmental Services Committee

Animal Health and Welfare Service – Annual Review of Charges

To be presented on 5th December 2024

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

SUMMARY

The purpose of this report is to seek approval of the increase to be applied to the Schedule of Charges in respect of services provided at the Heathrow Animal Reception Centre (HARC), for the forthcoming financial year 2025/26.

Your Port Health & Environmental Services Committee propose an increase in fees of 4% - 14% to be applied to the Schedule of Charges in respect of services provided at the Heathrow Animal Reception Centre.

RECOMMENDATION

That the Court of Common Council:-

- Approve the Heathrow Animal Reception Centre Byelaws as listing the maximum chargeable fees included in the Appendix to this report with effect from 1 April 2025.
- Approve the proposed Byelaws contained in the Appendix to this report and recommend that they be made, and that the Comptroller and City Solicitor be instructed to seal the Byelaws accordingly.

MAIN REPORT

Background

1. The City of London Corporation has statutory duties under the Animal Health Act 1981 and related legislation, which are delivered by the Animal Health and Welfare Service (AHWS). Duties include rabies control for Greater London and protection of animal welfare in transport, which are delivered through the Heathrow Animal Reception Centre (HARC). HARC delivers services to airlines and pet transport agents in order to generate income and offset the cost of statutory obligations.
2. Further charges are collected for discretionary services that the City must provide to HARC to operate effectively as a Border Control Post (BCP), but which are not strictly required to be carried out by the enforcement activity.

Although these fees are not statutory of themselves, because HARC was set up under the Animal Health Act 1981 (and predecessor legislation) the only means it has for levying any charges is through the byelaw procedure.

3. HARC operates in a commercial environment, competing to deliver airline services with private entities. The charges of the competing BCPs are taken into consideration when setting fees for the year ahead.

Current Position

4. It should be noted that HARC should only operate on a full-cost recovery basis for many of the services and functions it provides. The cost of delivering the service is increasing and to ensure the service can fully recover its cost in the future, the charges need to be raised.
5. Fees for HARC services relating to pet animals are price sensitive. Pet transport agents need to factor in the BCP charges, alongside freight charges and route options, when creating competitive quotes for owners. Charges relating to pet dogs, cats and ferrets have been increased by 4 to 6%.
6. Commercial consignments have fewer routing options into the UK, but pricing must be set so as to enable the most direct route to be selected. On balance of competitiveness and cost recovery, charges relating to commercial consignments have been increased by 10 to 14%.

Proposals

7. Your Committee now propose that to increase the fees for HARC (in tandem with increases for the licensing service delivered by the Animal Health Team approved by Your Committee), to provide an additional income for approximately £360k and help the service move back towards a position of full cost recovery. The Byelaws for 2025/26 will include the following statement, which will enable the service to reduce the rates if urgent needs arise, and to apply reduced rates to attract exclusive Service Level Agreements with airlines:

This schedule sets out the maximum fees that may be charged for the items specified herein. Under Section 36 of the Markets and Fairs Clauses Act 1847 the undertakers may from time to time change the amounts charged provided that any change does not result in a charge exceeding the amounts set out in this Schedule.

Your Committee have approved a delegated authority to the Executive Director of Environment to amend the fee structure, up to twice a year, by up to 20% per annum (not exceeding the maximum chargeable fees included in the Appendix to this report).

8. The Comptroller and City Solicitor will prepare the necessary revised Byelaws that reflect the proposed charges as contained in Appendix 1 and will subsequently seal these should the Court give them their approval.

Corporate & Strategic Implications

9. Strategic Implications

These proposals aim to achieve the following Corporate Plan aims of 1) Providing Excellent Services, by protecting and promoting public, animal, and environmental health (including our borders), consumer protection, and providing the Corporation's Licensing Service; and 2) Dynamic Economic Growth, by promoting the UK as a place that is open, innovative, and sustainable.

10. Financial Implications

The proposals aim to increase responsiveness to changes in the market, facilitating a reduction to be applied to some fees where appropriate. The projected income for 2024/25 is £3.36m. With the fees increased as proposed, the equivalent projected income for 2025/26 is £3.72m. With the delivery of new operations in the Forward Plan, this increase supports the service returning to a cost recovery position.

11. **Resource Implications** – None identified.

12. Legal Implications

The Comptroller and City Solicitor has reviewed the statutory obligations and related fees and charges and recommends the above proposal.

13. Risk Implications

Frequent changes to fees will impact on stakeholder's ability to accurately quote their customers for future imports. For this reason, reduction in fees will only be applied in exceptional circumstances.

14. **Equalities Implications** – None identified following a test of relevance.

15. **Climate Implications** – None identified.

16. **Security Implications** – None identified.

Conclusion

17. This proposal has taken into account the competitive position of HARC and price sensitivities of the services provided. Approval of a statement of maximum fees, and delegated authority to the Executive Director of Environment to amend fees below that maximum, will give increased responsiveness to the market. The resulting increase in income projected for 2025/26 will move the service towards a position of cost recovery. We therefore **recommend** that this Honourable Court approve the increase in HARC fees through the proposed Byelaws contained in Appendix 1 of this report, and that the Comptroller and City Solicitor be instructed to seal the Byelaws accordingly.

Appendices:

- Appendix 1 – Byelaws Relating to the Heathrow Animal Reception Centre.

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

DATED this 19th day of November 2024.

SIGNED on behalf of the Committee.

Mary Durcan
Chairman, Port Health and Environmental Services Committee

**ADDITIONAL BYELAWS RELATING TO THE
HEATHROW ANIMAL RECEPTION CENTRE**

From 1 April 2025

(2024/25 rates shown in brackets)

BYELAWS made by the Mayor and Commonalty and Citizens of the City of London acting by the Mayor, Alderman and Commons of the said City in Common Council assembled in pursuance of Sections 42 and 43 of the Markets and Fair Clauses Act 1847 as applied by Section 54 of the Animal Health Act 1981 with respect to the Heathrow Animal Reception Centre, London (“HARC”)

In these Bylaws unless the context otherwise required “the Principal Bylaws” means the byelaws made by the Mayor and Commonalty and Citizens of the City of London acting by the Mayor, Aldermen and Commons of the said City in Common Council assembled on 1st July 1976 and confirmed by the Minister of Agriculture, Fisheries and Food of 12th November 1976.

From the date of coming into operation of these Bylaws the Additional Bylaws made by the Mayor and Commonalty and Citizens of the City of London acting by the Mayor, Aldermen and Commons of the said City in Common Council assembled on 7 March 2024 (and sealed on 19 August 2024) shall be repealed and the following Schedule shall be substituted for the schedule to the Principal Bylaws:-

SCHEDULE

This schedule sets out the maximum fees that may be charged for the items specified herein. Under Section 36 of the Markets and Fairs Clauses Act 1847 the undertakers may from time to time change the amounts charged provided that any change does not result in a charge exceeding the amounts set out in this Schedule.

PART 1

ANIMALS CHARGE PER CONSIGNMENT

1.0 Dogs, Cats and Ferrets under the Pet Travel Scheme Non-commercial Movement of Pet Animals Order 2011

In order to meet the “pre-check” requirements (where applicable) all documentation must be submitted to the HARC no later than 72 hours prior to the animal’s departure.

- a) If a documentation ‘pre-check’ has been completed and approved by HARC, the consignment will be charged at the minimum charge of £203 (£195) for the first 24 hours.
- b) PETS that have NOT received a documentation ‘pre-check’ or arrive against the advice of HARC, will be charged at £279 (£268) for the first 24 hours.

PETS checked at aircraft (Assistance Animals)

- c) If a documentation 'pre-check' has been completed and approved by HARC, Assistance Animals will be charged at £250 (£240) plus a 1-hour collection charge of £197 (£189) = £447 (£429) for the first animal.
- d) Assistance Animals that have NOT received a documentation 'pre-check' or arrive against the advice of HARC, will be charged at £514 (£494) for the first animal.
- e) Where any consignment under a) to d) above consists of more than one animal, a fee of £52 (£49) per animal thereafter applies.

1.1 Dogs, Cats and Ferrets arriving as commercial consignments/under licence.

- a) £203 (£195) for the first 12 hours.
- b) Where the consignment consists of more than one animal, a fee of £52 (£49) per animal thereafter applies.

2. Mammals (excluding those listed under point 1.0 and 1.1) £226 (£205) for the first 12 hours

3. Birds

- a) Commercial birds £80 (£73) per box for up to 24 hours £226 (£205) minimum charge
- b) Birds of prey £22 (£20) per bird for up to 24 hours, £226 (£205) minimum charge
- c) Pet birds: £80 (£73) per box for up to 24 hours

Transit commercial bird consignments should be booked through to have a maximum stay at Heathrow of 24 hours.

4. Reptiles and amphibians £226 (£205) for up to 24 hours

Transit commercial reptile consignments should be booked through to have a maximum stay at Heathrow of 24 hours.

5. Fish/Fish Eggs/Aquatic Invertebrates/Invertebrates/Semen/Bird Eggs £2.49 (£2.26) per box, £44 (£40) minimum charge.

6. Horses/Farm livestock/other large species - Use of Large Animal Facility (per pallet) £484 (£440)

PART 2
CHARGES FOR ANCILLIARY SERVICES

7. Processing and handling fee for all shipments. £22 (£22)

8. Collection and delivery of animals and birds to and from the Animal Reception Centre by an Animal Reception Centre member of staff - £197 (£189) per hour or £99 (£95) per consignment if no extra waiting time.

9. Security - A charge of £28 (£25) will be made in respect of any consignment, which requires security screening prior to leaving the ARC.

10. Not on Board - Requests for collection of animals from aircraft, which are subsequently not found on board will be charged at normal collection charge (see Part 2, Section 2).

11. Destruction including disposal of livestock or goods - £55 (£50) per kilogram. Minimum charge £119 (£108). Travelling containers are the owner's property and should be collected with the animal. If they are no longer required, they will be disposed of for a fee of £23 (£22) per box.

12. Cleansing and disinfecting aircraft, animal holding facilities, vehicles, loose boxes etc. - £442 (£402) per hour (including disposal of special waste).

13. Additional boarding of non-commercial dogs, cats and ferrets - £52 (£49) per consignment per 24 hours or part thereof.

14. Additional boarding of commercial dogs, cats and ferrets - £52 (£49) per animal per 12 hours or part thereof.

15. Additional boarding of other mammals - £52 (£49) per consignment per 12 hours or part thereof.

16. Additional boarding of birds - £80 (£73) per box per 24 hours or part thereof.

17. Bird Quarantine £455 - £1,554 (£414-£1,413) for up to 30 days, plus veterinary and laboratory testing fees if applicable.

Fees are dependent on size of consignment and husbandry requirements.

Faecal Sampling and Bird Autopsy costs as per current Animal & Plant Health Agency rates.

18. Additional boarding of reptiles and amphibians - £226 (£205) per consignment per 24 hours or part thereof. Additional hourly handling charge may be applicable.

19. Additional handling functions £103 (£90) per hour for consignments requiring special handling/loading/transfer/repackaging, plus cost of materials.

20. Additional administrative functions including corrective actions and pre-export compliance checks £103 (£99) per hour.

21. Modification of containers to International Air Travel Association (IATA) standards:-

- a) Space Bars/Battens - £55 (£55) per box
- b) Air Holes or water pots - £25 (£25) per box

(If these services are carried out on the airport an additional fee of £99 (£99) applies for 'delivery' of the service).

22. Identification of species for DEFRA/HM Revenue and Customs/Border Force - £184 (£184) per hour.

23. Assisting on off airport operations - £103 (£99) per hour

Report – Licensing Committee

Gambling Act 2005: Review of Statement of Licensing Principles

To be presented on Thursday, 5th December 2024

*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 2025.

The Gambling Commission is due to publish new guidance to local authorities in 2025; to support the changes that they have begun to implement to their operator licence conditions and codes of practice. When this guidance is published, the Licensing Service's intention is to undertake a full review and redevelopment of the Policy; in line with the forthcoming requirements and best practice measures.

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 proposal which went out to consultation. A consultation analysis (Appendix 4) and Equality Impact Assessment (Appendix 5) were also undertaken for information. A Summary of Changes document is also attached to assist the Court in reviewing the changes to the Statement of Licensing Principles (Appendix 6).

RECOMMENDATION

The Court of Common Council agrees:

- The 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. Section 349 of the Gambling Act 2005 (the 'Act') requires licensing authorities to prepare, consult on and publish a statement of licensing principles (the 'policy') that they will apply in exercising their functions under the Act. The Act further prescribes that the policy shall remain valid for a period of three years, after which it must be reviewed and re-published. The policy may be reviewed at any point within the three-year period.
2. The current policy is due for renewal in 2025, 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
 - One or more persons representing the interests of persons carrying on gambling businesses within the City of London
 - One or more 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 30 August 2024 (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 written to incorporate identified risks to social cohesion and considered the local area profile of socio-economic factors within the Local Area Risk Assessment. The policy itself was largely based on a template drafted by the Local Government Association, with additions to specifically suit the City of London, and amended to reflect Government changes to published guidance.
8. The Gambling industry as controlled by the Gambling Act 2005 has a relatively light impact on the City of London. The Gambling (Geographical Distribution of Large and Small Casino Premises Licences) Order 2008, sets out in statute the

authorities that are permitted to have a casino, and the City of London is not named as one of those authorities. Furthermore, the City of London has no Adult Gaming Centres.

9. Premises licensed within the City are currently as follows:

- Betting Shops 11
- Gaming Machine Permits (2 or less) 68
- Gaming Machine Permits (3 or more) 12
- Bingo Establishments 1

Current Position

10. In 2022, 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 at Appendix 2 and Appendix 3 respectively. The new policy is almost identical to the previous policy, with minor changes to reflect the updated Gambling Commission's code of practice and to improve the general accessibility of the document, which can be seen at Appendix 1. A summary of changes document has been produced to assist members in reviewing the changes to the Policy and can be seen at Appendix 6.

12. The Gambling Commission are due to update their Guidance to Local Authorities in 2025; and until this is published a full review would be superfluous to requirements at this point in time. When the new Guidance is published, the Licensing Service will undertake a in depth review of the Statement of Licensing Principles and it's appendices to ensure that we continue to promote the Licensing Objectives in the City and comply with the legal requirements set out in the act, and the forthcoming statutory guidance.

13. The draft documents at Appendices 1,2 and 3 form the basis of the paper that was forwarded to consultees; the consultation period ran Tuesday 17th September 2024 to Tuesday 15th October 2024. No representations or comments were received during this time.

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

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

15. 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
- Executive Director of Community and Children's Services

- Gamble Aware
 - 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
16. The remaining statutory consultee, The Chief Officer of Police for the City of London, was also consulted.
17. Your Licensing Committee approved the Statement of Licensing Policy at its meeting on the 31st October 2024, and recommends approval by this Honourable Court, to ensure that this mandatory process complies with statutory requirements.

Conclusion

18. Your Licensing Committee therefore recommends that the Court of Common Council adopt the Statement of Licensing Policy and its appendices to allow the City to meet its statutory obligations and uphold the gambling licensing objectives. the principles as the new Gambling Policy.

Appendices

- Appendix 1 – Statement of Licensing Principles 2025
- Appendix 2 - The Gambling Local Area Profile
- Appendix 3 - Guidance on Undertaking Local Gambling Risk Assessments
- [Appendix 4 – Consultation Response Analysis](#) *(hard copy available on request)*
- [Appendix 5 - Equality Impact Assessment](#) *(hard copy available on request)*
- [Appendix 6 - Summary of Changes](#) *(hard copy available on request)*

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

DATED this 31st day of October 2024.

SIGNED on behalf of the Committee.

James Tumbridge
Chairman, Licensing Committee



STATEMENT OF LICENSING PRINCIPLES

GAMBLING ACT 2005

January 2025

Contents	Page
PART A – GENERAL	4
1. Introduction	4
2. The Licensing Objectives	6
3. Declaration	6
4. Responsible Authorities	7
5. Interested Parties	7
6. Exchange of Information	8
7. Enforcement	9
8. Licensing Authority Functions	10
PART B – PREMISES LICENCES	11
9. General Principles	11
Premises “Ready for Gambling”	13
Location	13
Planning	13
Licensing Objectives	14
Conditions	15
Door Supervisors	17
10. Adult Gaming Centres	17
11. Licensing Family Entertainment Centres	18
12. Casinos	18
13. Bingo Premises	19
14. Betting Premises	19
15. Travelling Fairs	20
16. Provisional Statements	20
17. Reviews	21
PART C – PERMITS / TEMPORARY & OCCASIONAL USE NOTICES	23
18. Unlicensed Family Entertainment Centres: Gaming Machine Permits	23

19.	Alcohol Licensed Premises: Gaming Machine Permits	24
20.	Prize Gaming Permits	25
21.	Club Gaming and Club Machine Permits	26
22.	Temporary Use Notices	27
23.	Occasional Use Notices	27
	PART D – LOCAL RISK ASSESSMENTS / LOCAL AREA PROFILE	28
24.	Local Risk Assessments	28
25.	Local Area Profile	28

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 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 the 615,000 people who come to work in the “Square Mile” every week . 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 as the world's leading international financial and business centre both home and abroad; The Mayor’s Office consults the City community on all 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 time to time, be revised when necessary, and published before taking effect.
- 1.4 The City of London Corporation consulted widely upon this statement before finalising and publishing it, as required by Section 349 of the Act. A list of those consulted with is provided below:
- Chief Officer of Police
 - Gambling Commission
 - Representatives of the Trade:
 - Ladbrokes
 - William Hill
 - Coral
 - Gamcare
 - GambleAware

- Betting and Gaming Council
- Gambling Business Group
- 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.

This statement of principles was consulted on from 17th September 2024 to 15th October 2024.

- 1.5 The policy was approved at a meeting of the Court of Common Council on [date to be confirmed] and is published via our website. Hard copies are available on request.
- 1.6 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 Act.

2. The Licensing Objectives

- 2.1 In exercising most of their functions under the Act, licensing authorities must have regard to the licensing objectives as set out in section 1. 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 The Corporation has a duty to pursue these objectives, and we expect gambling businesses to act in accordance with them. There is no restriction on the number of gambling premises in the city, and we will aim to permit the use of premises for gambling, providing we believe the use 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 under section 25 of the act.
 - reasonably consistent with the licensing objectives and
 - in accordance with the [licensing] authority's Statement of Licensing Principles.
- 2.3 Our aim to permit provides the Corporation wide remit to impose conditions on a premises licence, reject, review or revoke a premises licence where there is conflict with the objectives, code of practice, guidance or our 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 is consistent with the Gambling Commission's current guidance and code of practice. The statement will likely need to be review following the publication of of the Gambling Commission's guidance due 2025.
- 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 Executive 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 Section 158 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 licensing authority 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 set out by legislation 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 for Business and Trade 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 the licensing authority will not be involved in licensing remote gambling at all. This falls 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 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.

Location

- 9.13 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

- 9.14 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.

- 9.15 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.'
- 9.16 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.
- 9.17 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

- 9.18 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.
- 9.19 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 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 has been 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.

- 9.20 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.
- 9.21 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.
- 9.22 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.
- 9.23 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

- 9.24 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.

9.25 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.

9.26 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.

9.27 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.

9.28 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.

9.29 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

9.30 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.

9.31 Where it is decided that supervision of entrances/machines is appropriate for particular cases, door supervisors must be SIA licensed.

10. Adult Gaming Centres

10.1 The City of London 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 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 of London 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 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 Section 166(1) of The Gambling Act 2005 allows local authorities to pass a 'no casino' resolution. The City Corporation has not exercised this power. This is

because The Gambling (Geographical Distribution of Large and Small Casino Premises Licences) Order 2008 sets out in statute the authorities that are permitted to have a casino, and The City of London is not named as one of those authorities. Therefore, we do not consider it necessary to make a 'no casino resolution' at this time. Should the legislative order be amended in the future, the City Corporation may decide to pass such a resolution, and 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 Section 204 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 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

¹ Guidance on Undertaking Gambling Risk Assessments – January 2025

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 The City Corporation will expect local risk assessments to contain control measures that seek to mitigate those risks identified in the Local Area Profile.

Contact

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² Gambling Local Area Profile – January 2025

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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

January 2025

Contents	Page
Executive Summary	4
1. Introduction	5
1.1 Overview	5
2. Background	6
2.1 Aims of the Analysis	6
2.2 Approach	6
3. City of London Corporation	7
3.1 Overview	7
4. Developing the risk index models: theoretical basis	7
4.1 Overview	7
4.2 Methods	7
4.2.1 Stakeholder Consultation Survey	7
4.2.2 Stakeholder Consultation Interviews	8
4.3 Definitions	8
4.3.1 Gambling-related harm	8
4.3.2 Problem gambling	8
4.3.3 Nature of harms	8
4.3.4 Who can be vulnerable to gambling-related harm?	9
4.4 Gambling-Related Harm	9
4.4.1 Stakeholder perspective: What different types of harms arise from gambling?	9
4.4.2 Stakeholder perspective: Who do these harms affect?	10
4.4.3 Stakeholder perspective: How might harms vary from person to person	10
4.4.4 Stakeholder perspective: Over what time frame might harm be experienced?	10
4.5 Vulnerable people	10
4.5.1 Stakeholder perspective: Identifying vulnerability	10
4.5.2 Stakeholder perspective: Who is vulnerable to gambling-related harm?	11
4.5.3 Stakeholder perspective: Which groups are most vulnerable to gambling-related harm?	11
5. Developing the risk index models: modelling and spatial analysis	11
	2

5.1	Introduction	11
5.2	Characteristics of vulnerability	11
6.	The changing environment of gambling	13
6.1	How has the environment of gambling changed in the past 10yrs	13
7.	The Local Area Profile of the City of London	14
7.1	Introduction	14
7.2	Gambling Premises	14
7.3	City of London's 'hot spot' affected most by gambling-related harm	15
7.4	GamCare Statistics	16
7.5	The City of London's vulnerable groups	16
7.6	Local Area Profile Table	17
7.7	Demographic Profile	18
8.	Summary	19
Appendix A		
	Stakeholder Consultation Survey	20

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.

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.

Our Approach

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 often professional males aged between 18-35¹ years old who are in uncontrolled environments where warnings and control is limited, and often during working hours.

Children now regularly see gambling advertising and the number of gambling commercials on British TV has increased exponentially 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.

¹ EPIC Risk Management

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 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

2.1 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.

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.

2.2 Aims of the Analysis

- 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
- Provide the basis for an informed and astute led approach in decision making.

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 8,600 people. The daytime population of the City increases significantly, with approximately 615,000 people commuting into the City each week 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.

The city also has a high density of bars & 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 consultations have comprised of the following approaches: :

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 ascertained which types of people were viewed as vulnerable to, or at risk of, gambling-related harm, taking note of the responses in our stakeholder consultation survey.

4.2.2 Stakeholder Consultation face to face Interviews

Face to face consultation interviews have also been conducted 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.”²

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.”³

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)

² Responsible Gambling Strategy Board - 2009

³ Helpstopgambling.org

- 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.⁴

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

4.4 Gambling-Related Harm

Extracted from our stakeholder consultations 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

⁴ Gambling Commission 2012

- 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 consultations 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 18-35⁵ 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

⁵ EPIC Risk Management

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.

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 The gambling landscape has changed exponentially in the past 20 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. 32 million gaming accounts are now registered online with an estimate of up to 12 million users.⁶

Recent statistics show that 25% of the population will gamble online at least once a month⁷. However, the most alarming statistic is that 12% of under 18s have claimed to have gambled online⁸. The most predominant demographic however remains professional males aged between 18-35 years old⁹ who invariably are in uncontrolled environments where warnings and control are very limited.

⁶ Statista – March 2022

⁷ Xace – May 2023

⁸ National College – Young People & Gambling Survey 2019

⁹ EPIC Risk Management

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 to 1.4m since the Gambling Act 2005 came into force.¹⁰ These advertisements produced 30.9bn 'impacts' – i.e. the number of times a commercial was seen by – and reach 6 out of 10 of all 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.

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 weekly working population of approximately 615,000. The City is the only area in the United Kingdom in which the number of workers significantly outnumber the residents.

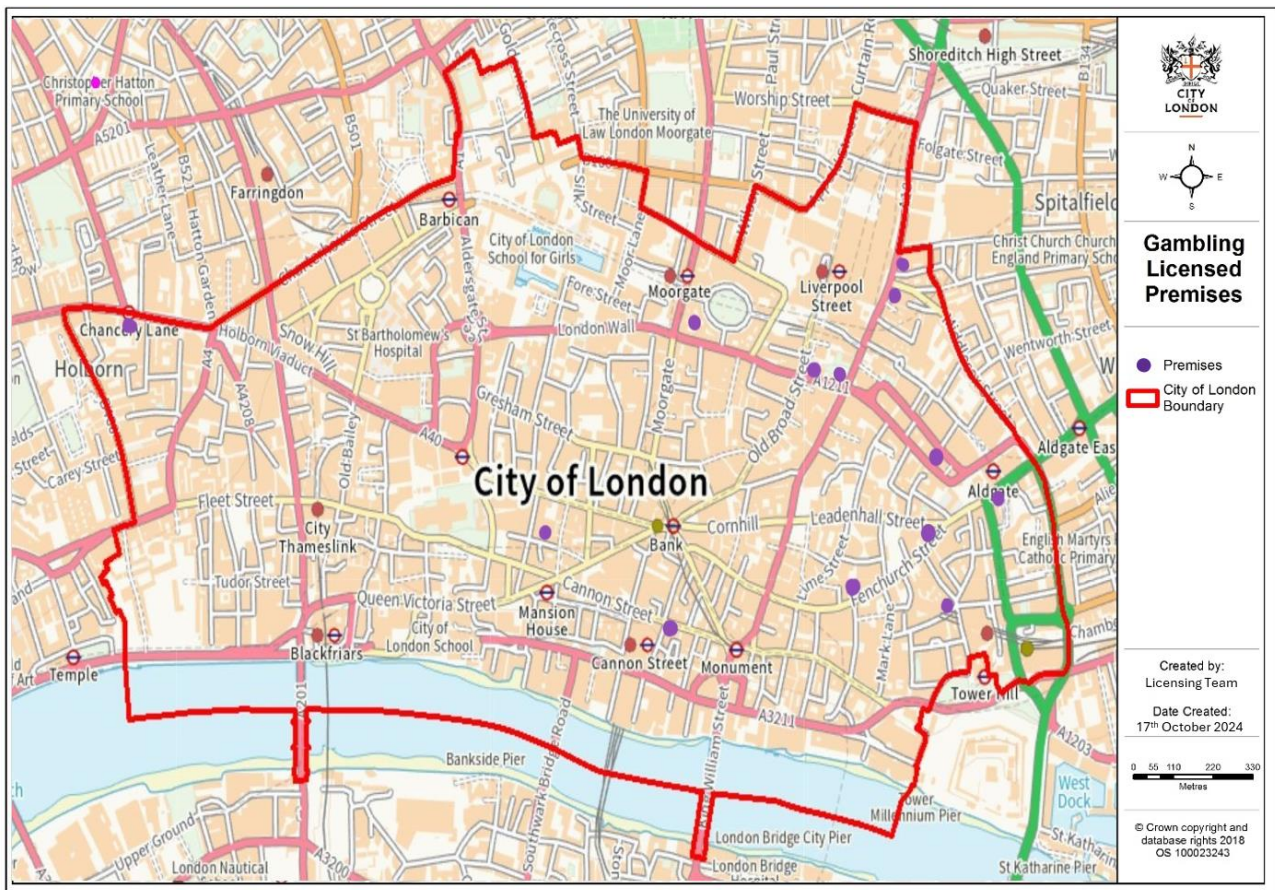
Additionally, over 18 million tourists visit London every year many of which visit the City of London as they acknowledge that the City is home to many popular attractions including St Paul's Cathedral, the Monument to the Great Fire of London, Guildhall galleries, Barbican Centre and the Museum of London.

7.2 Gambling premises

Gambling Premises have dramatically reduced in the last decade in the City of London with only 12 currently licensed (11 Betting Shops & 1 Bingo Club) . The majority of gambling premises are situated in the eastern half of the city.

The map on the following page provides an Overview of all current licences within the City of London.

¹⁰ Ofcom Research - 2013



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 30¹¹ 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

¹¹ National Problem Gambling Clinic

The area east of the City of London is most likely to be affected by gambling-related harm, due to the cluster of current licences in the east of the City of London, and the hub of the financial district.

7.4 GamCare & GambleAware Statistics

The information above is evident in the statistics provided by GamCare & GambleAware.

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. Trying to access updated stats via GamCare London. 0207

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).

Gambleaware stats show that City of London has a lower proportion of people experiencing potential harm than the national average. However over 60% of those that have accessed support services are in the highest category of defined problem gambling.

Furthermore, the proportion of 18-34 year olds and people from minority ethnic groups suffering with high-levels of problem gambling is actually higher than the national average. The annual fiscal cost of problem gambling to the City is estimated to exceed £168 million.

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

Extracted from our stakeholder consultations, the Gambling Commission’s survey 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

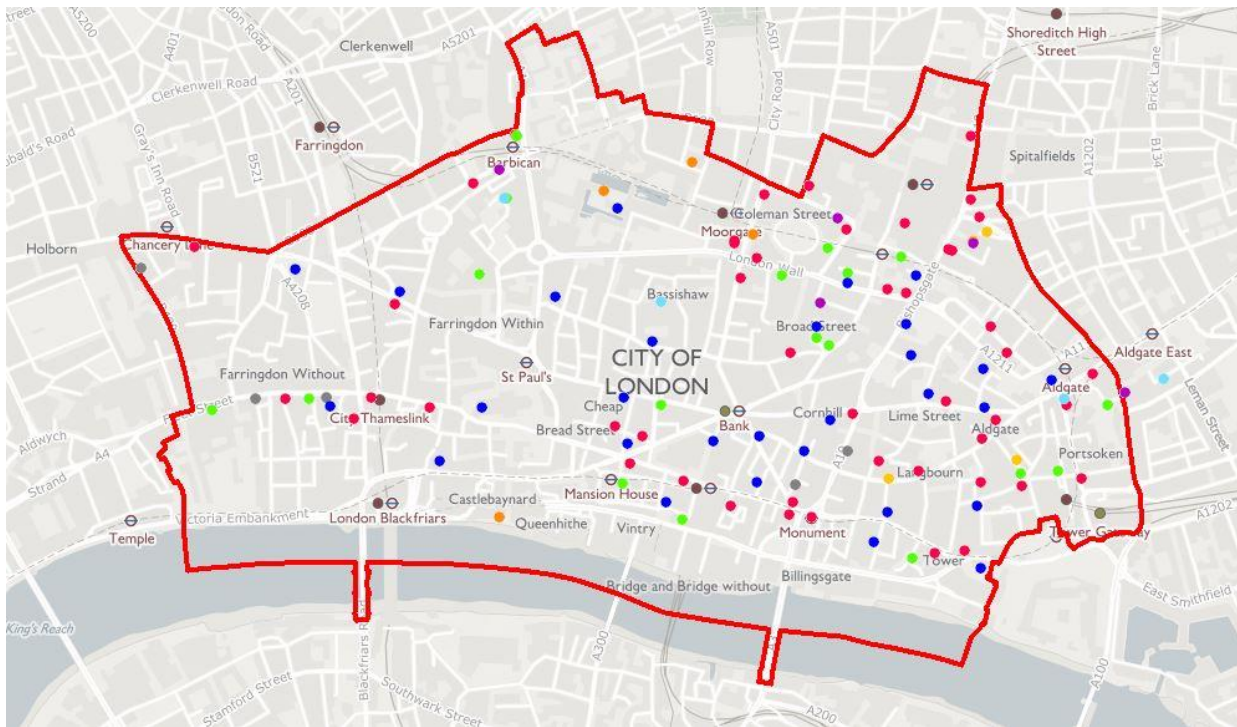
As outlined above the table below demonstrates which of the identified characteristics had first-hand evidence. The characteristics which are shaded in darker grey show where there was evidence to support that these characteristics are associated with a higher risk of harm.

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

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](#). Refreshed and additional data sets will be added as they become available.



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

8. Summary

- 8.1 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 old¹² 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 audience¹³, and the number of gambling commercials on British TV has increased exponentially 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.

- 8.2 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.

¹² EPIC Risk Management

¹³ Ofcom research – 2013

Appendix A

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 2024 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 an update to existing 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.

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)

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GUIDANCE ON UNDERTAKING LOCAL GAMBLING RISK ASSESSMENTS

GAMBLING ACT 2005

January 2025

Contents	Page
1. Introduction	3
2. Background	4
3. Risk assessment triggers	6
New premises	6
Significant changes in local circumstances	6
Significant changes to the premises	7
Variation of the premises licence	8
Regular review of risk assessments	8
4. Local risks and control measures	9
Local area risks	9
Gambling operational risks	10
Premises design risks	10
Interior design risks	10
Exterior design risks	11
Control measures	11
5. Undertaking a local risk assessment	12
Who should undertake the assessment	12
Step 1: The local area	13
Step 2: The gambling operation	13
Step 3: The design of the premises	14
Step 4: Control measures	14
Completed assessments	14
Appendix A City of London Corporation Local Gambling Risk Assessment Template	16

1. Introduction

- 1.1 The Gambling Commission (the Commission) includes 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 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 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 have to hold a risk assessment for all of their existing premises. Additionally 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 The Commission has a 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 has an ordinary code provision relating to sharing local risk assessments. Both provisions were reviewed and updated on 1 April 2024. 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 1 April 2024.

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 10.1.2

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 are dated 1 April 2024. 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 Gambling Act 2005 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.

- 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 Operators will assess 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 stated above 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

Page 137

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 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

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Report – Planning & Transportation Committee

Annual On-Street Parking Accounts 2023/24 and Related Funding of Highway Improvements and Schemes

To be presented on Thursday 5 December 2024

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

SUMMARY

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

The purpose of this report is to inform Members that:

- the surplus arising from on-street parking activities in 2023/24 was £10.220m;
- a total of (£7.810m) was applied in 2023/24 to fund approved projects; and
- the surplus remaining on the On-Street Parking Reserve at 31st March 2024 was £58.628m, which will be wholly allocated towards the funding of various highway improvements and other projects over the medium term.

RECOMMENDATION

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

MAIN REPORT

Background

1. Section 55(3A) of the Road Traffic Regulation Act 1984 (as amended), requires the City of London in common with other London authorities (i.e. other London Borough Councils and Transport for London), to report to the Mayor for London on action taken in respect of any deficit or surplus in their On-Street Parking Account for a particular financial year.
2. Legislation provides that any surplus not applied in the financial year may be carried forward. If it is not to be carried forward, it may be applied by the City for one or more of the following purposes:
 - a) making good to the City Fund any parking related deficit charged to that Fund in the 4 years immediately preceding the financial year in question;

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

2023/24 Outturn

4. The overall financial position for the On-Street Parking Reserve in 2023/24 is summarised below:

	£m
Surplus Balance brought forward at 1st April 2023	56.218
Surplus arising during 2023/24	10.220
Expenditure financed during the year	(7.810)
Funds remaining at 31st March 2024, wholly allocated towards funding future projects	58.628

5. Total expenditure of (£7.810m) in 2023/24 was financed from the On-Street Parking Reserve, covering the following approved projects:

Revenue/SRP Expenditure:	£000
Highway Resurfacing, Maintenance & Enhancements	(2,626)
Concessionary Fares & Taxi Card Scheme	(402)
Dominant House Footbridge Future Options	(372)
Climate Action Strategy – Cool Streets & Greening	(228)
St Paul’s Gyrotory	(123)
West Smithfield Area Public Realm & Transportation	(80)
Highways Ground Penetrating Radar Survey	(75)
Traffic Review Order	(60)
Cleaning Maintenance Lord Mayors Show	(60)
Highways Street Furniture ASB Protection Measures	(50)
Aldgate Maintenance for City Open Spaces	(40)
Special Needs Transport	(34)
London Wall Car Park Waterproofing and Repairs	(24)
Climate Action Strategy – Pedestrian Priority	(7)
Temple Area Traffic Review	(4)
London Wall Car Park Fire Safety Works	(1)
Minorities Car Park – Structural Building Report	10
Off-Street Car Parking Contribution to Reserves	238
Total Revenue/SRP Expenditure	(3,938)
Capital Expenditure:	
Bank Junction Improvements (All Change at Bank)	(2,003)
Climate Action Strategy – Pedestrian Priority	(989)
Barbican Podium Waterproofing – Phase 2	(474)
Climate Action Strategy – Cool Streets & Greening	(340)
Traffic Enforcement CCTV	(65)
Crossrail Liverpool Street Phase 2	(16)
Baynard House Fire Safety	15
Total Capital Expenditure	(3,872)
Total Expenditure Funded in 2023/24	(7,810)

6. The surplus on the On-Street Parking Reserve brought forward from 2022/23 was £56.218m. After expenditure of (£7.810m) funded in 2023/24, a surplus balance of £2.410m was carried forward to future years to give a closing balance at 31st March 2024 of £58.628m.
7. Currently total expenditure of some £106.8m is planned over the medium term from 2024/25 until 2028/29 (as detailed in Table 1), by which time it is anticipated that the existing surplus plus those estimated for future years will be fully utilised.
8. The total programme covers numerous major capital schemes including funding towards the Barbican Podium Waterproofing; Bank Junction Improvements; Climate Action Strategy Cool Streets & Greening and Pedestrian Priority; Holborn Viaduct & Snow Hill Pipe-Subways Repairs; Traffic Enforcement CCTV; Minorities Car Park Structural Building Report; West Smithfield Area Public Realm &

Transportation Project; St Paul's Gyratory; Dominant House Footbridge Repairs; London Wall Car Park Waterproofing, Joint Replacement & Concrete Repairs; Lindsey Street Bridge Strengthening; Fire Safety at the Car Parks; Pedestrian Priority Programme @ King William Street; Enhancing Cheapside; Vision Zero Safer Streets; and Outdoor Fitness Equipment @ Old Watermans Walk. Progression of individual schemes is subject to the City's normal evaluation criteria and Standing Orders.

9. The programme also covers ongoing funding of future revenue projects, the main ones being Highway Resurfacing, Enhancements & Road Maintenance Projects; Concessionary Fares & Taxi Cards; Traffic Review Order; Contributions to the Costs of Off-Street Car Parks (including CWP works); Special Needs Transport; Cleansing Maintenance for the Lord Mayors Show; Annual Maintenance of Aldgate; Secure City CCTV system; street cleansing contract; City Gardens highways & cleansing maintenance; Highways ground penetrating radar system; Highways street furniture ASB protection measures; streets decluttering; and Riverside Lighting Upgrade.
10. Following Member requests to allocate On-Street Parking surplus monies, a newly formed Priorities Board chaired by the Town Clerk now considers all new eligible bids for surplus funds before recommending successful bids to Members of RASC and P&R Committees for decision. This new mechanism has been designed to ensure surplus monies are allocated to eligible projects in an efficient and speedy process to meet spending priorities, a number of which schemes are now included in paragraphs 8 and 9 above to be spent in the medium term.
11. A forecast summary of income and expenditure arising on the On-Street Parking Account and corresponding contribution (from)/to the On-Street Parking surplus, over the medium-term financial planning period, is shown below in Table 1. This highlights that the current surplus held of £58.628m as at 31st March 2024 will reduce to £8.5m by 31st March 2027 and is fully committed in the longer term.
12. The increase in annual operating expenditure forecast from 2024/25 onwards is mainly due to increased enforcement contract costs, back-office support contract costs (printing, postage and IT software) plus staff salary increases.

Table 1 On-Street Parking Account Reserve Projections 2023/24 to 2028/29	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total
	Actual £m	Forecast £m	Forecast £m	Forecast £m	Forecast £m	Forecast £m	£m
Income	13.0	13.1	13.5	13.9	14.3	14.7	82.5
Expenditure (Note 1)	(2.8)	(4.0)	(4.1)	(4.3)	(4.4)	(4.5)	(24.1)
Net Surplus arising in year	10.2	9.1	9.4	9.6	9.9	10.2	58.4
Capital, SRP and Revenue Commitments	(7.8)	(32.0)	(30.2)	(16.0)	(12.2)	(16.4)	(114.6)
Net in year contribution (from)/to surplus	2.4	(22.9)	(20.8)	(6.4)	(2.3)	(6.2)	(56.2)
(Deficit) / Surplus cfwd at 1 st April	56.2	58.6	35.7	14.9	8.5	6.2	
(Deficit) / Surplus cfwd at 31st March	58.6	35.7	14.9	8.5	6.2	0.0	

Note 1: On-Street operating expenditure relates to direct staffing costs, current enforcement contractor costs, fees & services (covering bank charges, postage, printing & legal), IT software costs for enforcement systems, provision for bad debts for on-street income and central support recharges.

Conclusion

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

Background Papers

14. Road Traffic Regulations Act 1984; Road Traffic Act 1991; GLA Act 1999 sect 282.
15. Final Accounts 2023/24.

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

DATED this 5th day of November 2024.

SIGNED on behalf of the Committee.

Deputy Shravan Joshi
Chairman, Planning & Transportation Committee

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Resolution of Thanks to the Late Lord Mayor – *by Deputy Christopher Hayward*

To be presented on Thursday, 5th December 2024

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

Motion:-

“That the Members of this Court take great pleasure in expressing to

Alderman Professor Michael Mainelli

their sincere gratitude and appreciation for the distinguished manner in which he has carried out the role of Lord Mayor of the City of London during the past year.

Hailing from the USA, Michael has served as the 695th Lord Mayor, and has been the first individual of not only British, but also American Irish and Italian heritage to take up this mantle.

Whether at home or abroad, he has been an exemplary ambassador for both the City of London and for the United Kingdom. We are especially grateful to Michael for his ‘Connect to Prosper’ Mayoral Theme, whereby he has worked tirelessly to bring together leaders in the scientific, academic and business worlds, growing the global competitiveness of the UK as a world leader in those areas in order to solve global challenges.

The Lord Mayor successfully represented the UK Financial and Professional services sector at COP28 and subsequently hosted the Net Zero Delivery Summit championing the crucial net zero pledges. The Lord Mayor has promoted the interests of the City, London and the nation around the globe, and undertook more than 24 international visits highlighting the City’s strengths in innovation and sustainable finance.

It would be remiss of me to comment on Michael’s year in office without recognising his ‘Experiment Series’, highlighting the inventiveness that thrives within the City and showcasing the work of the City’s science and academic communities.

Michael has also hosted many special occasions at Mansion House and Guildhall, including not one but two magnificent State Banquets held to mark, respectively the visits of the President of the Republic of Korea in November 2023, and the Emperor & Empress of Japan in June 2024. Such a diverse programme has placed huge demands on the Lord Mayor and he has met the challenge with sound knowledge, dignity and good humour.

Throughout this historic and momentous year, in all of his work, the Lord Mayor has received enthusiastic support from Elisabeth, the Lady Mayoress, and, as we

move to the close of what we hope has been a memorable and special period for them both, this Honourable Court thanks Michael for all that he has done as Lord Mayor. In taking their leave of Michael, their 695th Lord Mayor, Honourable Members send to him, Elisabeth and their children, our very best wishes for their future good health and happiness.



List of Applications for the Freedom

To be presented on Thursday, 5th December, 2024

*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.

Kathryn Olive Adams <i>Rodney Cartwright</i> <i>Nicholas Robert Jones</i>	an Artist and Printmaker <i>Citizen and Plumber</i> <i>Citizen and Plumber</i>	Surrey
Bushra Anond Ahmed <i>Ald. Kawsar Zaman</i> <i>Ald. Prem Babu Goyal, OBE</i>	a Business Consultant <i>Citizen and Alderman</i> <i>Citizen and Goldsmith</i>	Croydon, London
Ahmed Hamed Ahmed Mali <i>The Rt Hon. The Lord Mayor</i> <i>Robert James Ingham Clark</i>	a Hospital Chief Executive Officer <i>Citizen and Blacksmith</i> <i>Citizen and Clothworker</i>	Jerusalem, Israel
Charles Alexander Edward Begley <i>Deputy Shравan Jashvantrai</i> <i>Joshi, MBE</i> <i>Deputy Christopher Michael</i> <i>Hayward</i>	a Property Association Chief Executive <i>Citizen and Fueller</i> <i>Citizen and Pattenmaker</i>	Essex
Dr Eric Bosshard <i>Andrew Edward Paul</i> <i>Essinghigh</i> <i>Scott Andrew James Cargill</i>	an Oil and Gas Company Managing Director, retired <i>Citizen and Loriner</i> <i>Citizen and Loriner</i>	Bromley, London
Theresa Dianne Bosshard <i>Andrew Edward Paul Essinghigh</i> <i>Scott Andrew James Cargill</i>	a Health Company Director <i>Citizen and Loriner</i> <i>Citizen and Loriner</i>	Bromley, London
Dean Browning <i>David James Sales, CC</i> <i>Simon Andrew Abbott</i>	an Aviation Insurance Broker <i>Citizen and Insurer</i> <i>Citizen and Insurer</i>	Billericay, Essex
Silvia Camattari <i>Brendan Anthony Michael</i> <i>Barns, CC</i> <i>Deputy Patricia Ann Holmes</i>	a Foreign Language Teacher and Interpreter <i>Citizen and Common Councillor</i> <i>Citizen and Cordwainer</i>	West Sussex

Robert Alan Clouse Jr <i>Timothy James McNally, CC</i> <i>David James Sales, CC</i>	an Information Technology Consultant <i>Citizen and Glazier</i> <i>Citizen and Insurer</i>	Minnesota, United States of America
Pamela Rosemarie Coke-Hamilton <i>Lars Bendik Andersen</i> <i>Ald. Prof. Michael Raymond Mainelli</i>	International Trade Centre Executive Director <i>Citizen and World Trader</i> <i>Citizen and World Trader</i>	Vaud, Switzerland
Grace Louisiana Collins <i>Ald. Prem Babu Goyal, OBE</i> <i>Aaron Anthony Jose Hasan D'Souza, CC</i>	a Local Government Association Leadership Adviser <i>Citizen and Goldsmith</i> <i>Citizen and Common Councillor</i>	Bedford, Bedfordshire
Jack Derek Copeland <i>John Alexander Smail</i> <i>Stephen James Osborne</i>	a Chartered Accountant, retired <i>Citizen and Distiller</i> <i>Citizen and Chartered Secretary & Administrator</i>	Glasgow, Scotland
Simon Gordon Roger Elsy <i>Richard George Turk</i> <i>Claude Andrew Robert Fenemore-Jones</i>	a Human Resources Manager, retired <i>Citizen and Shipwright</i> <i>Citizen and Scrivener</i>	Richmond Upon Thames, London
Onur Engin <i>Dhruv Patel</i> <i>Shailendra Kumar Kantilal Umradia, CC</i>	a Property Investment Adviser <i>Citizen and Clothworker</i> <i>Citizen and Information Technologist</i>	Bexley, London
Carl Constantin Roman Emanuel Eschlböck <i>Roger William Sanders, OBE</i> <i>Carl Alexander Malmaeus</i>	a Lawyer <i>Citizen and Broderer</i> <i>Citizen and Pavior</i>	Vienna, Austria
Alec Albert Edmund Everitt <i>James David Fell</i> <i>Brian Henry Childs</i>	a Firefighter, retired <i>Citizen and Constructor</i> <i>Citizen and Coachmaker & Coach Harness Maker</i>	Barking, London
Adam James French <i>Deputy Madush Gupta</i> <i>Ald. Timothy Russell Hailes, JP</i>	an Investor <i>Citizen and Pewterer</i> <i>Citizen and Pewterer</i>	Southwark, London
Stephen Robert Godden <i>Ricky James Toomey</i> <i>Derek John Lawrence</i>	a Residential Landlord <i>Citizen and Blacksmith</i> <i>Citizen and Blacksmith</i>	Orpington, Kent
Elizabeth Mary Henderson <i>Ald. Prem Babu Goyal, OBE</i> <i>Aaron Anthony Jose Hasan D'Souza, CC</i>	a Business Development Consultant <i>Citizen and Goldsmith</i> <i>Citizen and Common Councillor</i>	Richmond Upon Thames, London
Claire Hollinghurst <i>Thomas Shepherd Richardson</i> <i>The Rt Hon. Viscount Thurso John Archibald Sinclair</i>	a Livery Company Assistant Clerk <i>Citizen and Innholder</i> <i>Citizen and Innholder</i>	Wandsworth, London

Janice Mary Elizabeth Howard <i>Lisa Rutter</i> <i>Alistair John Mitchellhill</i>	a Pension Fund Company Director <i>Citizen and Pattenmaker</i> <i>Citizen and Fletcher</i>	Merton, London
David James Hutchinson <i>Ann-Marie Jefferys</i> <i>Anne Elizabeth Holden</i>	a Training Company Head of Finance <i>Citizen and Glover</i> <i>Citizen and Basketmaker</i>	Coventry, West Midlands
Mark Glessing Imray <i>David James Sales, CC</i> <i>Timothy James McNally, CC</i>	a Housing Company Non-Executive Director <i>Citizen and Insurer</i> <i>Citizen and Glazier</i>	Lincolnshire
Simon John Jones <i>John Ross Foley, CC</i> <i>Richenda Carey</i>	an Actor <i>Citizen and Wax Chandler</i> <i>Citizen and Feltmaker</i>	Westminster, London
James Murray Kayll <i>Deputy Madush Gupta</i> <i>Ald. Timothy Russell Hailes, JP</i>	a Banking & Capital Markets Relationship Director <i>Citizen and Pewterer</i> <i>Citizen and Pewterer</i>	Dorset
Andrew William Lang <i>Ald. Sir Andrew Charles Parmley</i> <i>Jaspreet Hodgson, CC</i>	a Photographer and Designer <i>Citizen and Musician</i> <i>Citizen and Vintner</i>	Brixton, London
William Marian Lynch <i>Vincent Dignam</i> <i>John Paul Tobin</i>	a Plant Hire Company Chairman <i>Citizen and Carman</i> <i>Citizen and Carman</i>	Enfield, London
Alison Flora Macmillan, LVO <i>Peter Gerard Dunphy, CC</i> <i>Ald. Sir William Anthony Bowater Russell</i>	a Senior Civil Servant <i>Citizen and Draper</i> <i>Citizen and Haberdasher</i>	Paignton, Devon
Callum John Macpherson <i>Ald. Sir Andrew Charles Parmley</i> <i>Wendy Davina Calder Parmley</i>	an Investment Banker <i>Citizen and Musician</i> <i>Citizen and Information Technologist</i>	Westminster, London
Alexander David George Marsh <i>Deputy Madush Gupta</i> <i>Ald. Timothy Russell Hailes, JP</i>	a Strategic Consultancy Managing Director <i>Citizen and Pewterer</i> <i>Citizen and Pewterer</i>	Brighton, East Sussex
Ross Manson McEwen <i>Rafe Heydel-Mankoo</i> <i>David Beattie, CMG</i>	a Regulatory Investigator <i>Citizen and Scrivener</i> <i>Citizen and Mason</i>	Kirkcaldy, Fife, Scotland
David Anthony Moody <i>Graham John Peacock</i> <i>John Edward Peacock</i>	an Operational Heritage Manager <i>Citizen and Loriner</i> <i>Citizen and Loriner</i>	Hemel Hempstead, Hertfordshire
Tristan Jeremy Nesbitt <i>David Alastair Morgan-Hewitt</i> <i>Philippe Roland Rossiter</i>	a Hotel Manager <i>Citizen and Innholder</i> <i>Citizen and Innholder</i>	Edinburgh, Scotland

John Adekunle Adetola Babatunde Osibote <i>Deputy James Michael Douglas Thomson</i> <i>Tijs Broeke, CC</i>	a Police Officer, retired <i>Citizen and Grocer</i> <i>Citizen and Goldsmith</i>	Havering, London
Alan Page-Duffy <i>Ald. Prof. Michael Raymond Mainelli</i> <i>Vladislav Dobrokhotov</i>	a Legal Services Consultant <i>Citizen and World Trader</i> <i>Citizen and Marketor</i>	Tallin, Estonia
Nitesh Krishan Palana <i>Deputy Madush Gupta</i> <i>Ald. Timothy Russell Hailes, JP</i>	a Director of Risk and Compliance <i>Citizen and Pewterer</i> <i>Citizen and Pewterer</i>	Westminster, London
Chhaya Pancholi <i>Deputy Shравan Jashvantraï Joshi, MBE</i> <i>Graham David Packham, CC</i>	a Planning Professional <i>Citizen and Fueller</i> <i>Citizen and Upholder</i>	Leicestershire
Benjamin Gordon Ramsey <i>Sir David Hugh Wootton</i> <i>Richard David Bundock</i>	a Scaffolding Company Director <i>Citizen and Fletcher</i> <i>Citizen and Basketmaker</i>	Rochester, Kent
Sudarshan Guru Ratnavelu <i>Deputy Madush Gupta</i> <i>Ald. Timothy Russell Hailes, JP</i>	a Cybersecurity Consultant <i>Citizen and Pewterer</i> <i>Citizen and Pewterer</i>	Croydon, London
Elisabeth Marie Béatrice Reyes <i>Douglas Wills</i> <i>Michael John James</i>	a Web Consultancy Company Director <i>Citizen and Stationer & Newspaper Maker</i> <i>Citizen and Stationer & Newspaper Maker</i>	Brent, London
Nathan James Rollinson <i>Alfred Gordon Bain</i> <i>Prof. Arthur Tudor Tucker</i>	a Threat Analyst <i>Citizen and Turner</i> <i>Citizen and Apothecary</i>	Lambeth, London
Oluwatobi Oluwaseun Sanyaolu <i>Ald. The Hon. Timothy Charles Levene</i> <i>Deputy James Michael Douglas Thomson</i>	a Student <i>Citizen and Carmen</i> <i>Citizen and Grocer</i>	Bexley, London
Norma Claire Singers <i>His Honour Judge Mark Lucraft</i> <i>Fiona Josephine Adler</i>	an Executive Coach <i>Citizen and Founder</i> <i>Citizen and Tobacco Pipe Maker & Tobacco Blender</i>	Brent, London
Claire Elena Spencer <i>Ald. Sir William Anthony Bowater Russell</i> <i>CC Thomas Charles Sleigh</i>	an Arts Centre Chief Executive <i>Citizen and Haberdasher</i> <i>Citizen and Common Councillor</i>	Southwark, London
Craig Robert Spencer <i>CC Tijs Broeke</i> <i>Deputy James Michael Douglas Thomson</i>	a Civil Servant <i>Citizen and Goldsmith</i> <i>Citizen and Grocer</i>	Waltham Forest, London

<p>Lesley Susan Steeds <i>John Alexander Smail</i> <i>Stephen James Osborne</i></p>	<p>a Dry Cleaner, retired <i>Citizen and Distiller</i> <i>Citizen and Chartered Secretary & Administrator</i></p>	<p>East Grinstead, West Sussex</p>
<p>Anna Caroline Maria Strbac <i>Jamel Banda, CC</i> <i>Deputy Philip Woodhouse</i></p>	<p>a Chartered Accountant <i>Citizen and Poulter</i> <i>Citizen and Grocer</i></p>	<p>Wandsworth, London</p>
<p>Philip Geoffrey Targett-Adams Manzanera, OBE <i>His Honour Judge Mark Lucraft</i> <i>Fiona Josephine Adler</i></p>	<p>a Musician and Record Producer <i>Citizen and Founder</i> <i>Citizen and Tobacco Pipe Maker & Tobacco Blender</i></p>	<p>Brent, London</p>
<p>Suzanne Elizabeth Walker <i>Ald. Sir Andrew Charles Parmley</i> <i>Jaspreet Hodgson, CC</i></p>	<p>an Arts Producer <i>Citizen and Musician</i> <i>Citizen and Vintner</i></p>	<p>Brixton, London</p>
<p>Dr Peter Wong-Morrow <i>Timothy James McNally, CC</i> <i>David James Sales, CC</i></p>	<p>an Insurance Company Chairman <i>Citizen and Glazier</i> <i>Citizen and Insurer</i></p>	<p>Hertfordshire</p>

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Report – Audit and Risk Management Committee

Annual Report

To be presented on Thursday, 5th December 2024

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

SUMMARY

The Audit and Risk Management Committee presents to the Court of Common Council the 2023/24 Annual Report of the Audit and Risk Management Committee, reporting on activity from 1 April 2023 to 31 March 2024. Providing this report to the Court of Common Council on an annual basis is 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.

RECOMMENDATION

Members of the Court are asked to note the report.

Introduction

1. The Audit & Risk Management Committee (the Committee) has a wide-ranging brief that underpins the City of London Corporation's governance processes by providing independent challenge and oversight of the adequacy of risk management, the internal control and financial reporting frameworks.
2. The Audit and Risk Management Committee has served to scrutinise the risk management process at the City Corporation and enhance the maturity of risk management organisation wide. The Committee has continued to play an important and integral part in ensuring key risks are reviewed through regular risk updates and deep dives of corporate risks (carried out by Internal Audit Team) on a rolling basis. The Committee has also served to improve engagement with the work of Internal Audit through receiving regular reports on completed work and monitoring the implementation of Internal Audit recommendations. The Committee oversees the planning and delivery of the External Audit review of the Annual Accounts produced by the City of London Corporation across all operations.
3. This report details the work of the Committee for the period from 1 April 2023 to 31 March 2024 and outlines work in relation to the key remit areas of:
 - Annual Governance Framework
 - Internal Audit
 - Risk Management
 - Counter-Fraud
 - External Audit
 - Financial Reporting

4. Members bring a wide range of skills and considerable experience in various technical and professional areas. They are supported by a periodic skills gap analysis conducted by the Nominations Committee. The Committee consists of 12 members, along with three external members who provide additional knowledge and skills.

Table 1: Members of the Audit & Risk Management Committee 2024/25

Alderman Prem Goyal (Chairman)
Alderwoman Elizabeth King (Deputy Chairman)
Gail Le Coz (Deputy Chair, External Member)
Randall Anderson, Deputy
Christopher Boden, Deputy
Henry Nicholas Almroth Colthurst, Deputy (Ex-Officio, Chairman of the Finance Committee)
Alderman Bronek Masojada
Judith Pleasance
Karen Sanderson (External Member)
Ruby Sayed
Naresh Sonpar
Dan Worsley (External Member)
Alderman Alexander Barr
Alderman Kawsar Zaman

5. The three external members are each appointed for a three-year term, which can be renewed twice. Karen Sanderson has given notice of her intention not to renew her appointment and authorisation to advertise for her replacement was approved accordingly at the Committee meeting held in November 2024.

- Karen Sanderson (appointed for a three-year term expiring April 2025)
- Dan Worsley (appointed for a three-year term expiring in April 2026)
- Gail Le Coz (appointed for a three-year term expiring in April 2027)

Changes Within the Year

6. There were no specific change events that require mention here.

Annual Governance Framework

7. The Accounts and Audit (England) Regulations 2015, which govern the City of London's City Fund activities, mandate that an audited body must annually review the effectiveness of its internal control, risk management, and governance systems. This review must be documented in an Annual Governance Statement (AGS), which is published alongside the authority's Statement of Accounts. The AGS aims to:

- Provide a brief description of the governance framework.
- Outline the activities undertaken to evaluate the governance framework and the results of that review.
- Present an action plan to enhance the effectiveness of the governance framework.

8. The draft AGS for 2022/23 was presented at the 13 May meeting. Committee Members suggested adding a section to emphasise the importance of Member induction, especially with the upcoming elections in March 2025. The AGS was approved at this meeting for signing by the Chairman of the Policy and Resources Committee and the Town Clerk and Chief Executive.

Internal Audit

9. In May 2024, the Committee received the Head of Audit & Risk Management's Annual Audit Opinion for the year ending 31 March 2024. The opinion stated:
“Based on the Internal Audit work conducted in 2023/24, I can reasonably conclude that the City’s risk management, control, and governance processes are adequate and effective. In my opinion, the City has sufficient internal control systems in place to achieve its objectives.”
10. The Internal Audit programme is aligned with the City’s corporate and departmental objectives and key risks to ensure these areas are adequately covered. The Internal Audit identified several opportunities for improving controls and procedures, issuing a “Limited (Red) Assurance” opinion in four cases. Management has accepted the recommendations, and the Committee monitors the progress of their implementation. The Committee has collaborated with the Head of Internal Audit to enhance reporting information and tracking mechanisms.
11. Throughout the year, the Internal Audit programme for 2023/24 was reviewed. The Committee acknowledged the resourcing challenges faced by the Internal Audit function and the impact on the scope and coverage of the audits. Consequently, a proposal to increase the resource base for Internal Audit was supported and recruitments are currently underway.

Risk Management

12. The Committee is tasked with monitoring and overseeing the City of London Corporation’s risk management strategy, ensuring that the authority’s assurance framework accurately reflects the risk environment.
13. During this period, the City Corporation’s Risk Management Strategy was reviewed, and in May 2024, the Audit and Risk Management Committee endorsed the new five-year strategy. This review was informed by feedback from the Committee on culture and approach, Internal and External Audit reviews and best practices, and input from the Chief Officer Risk Management Group (CORMG), the Executive Leadership Board, and the City Corporation’s Risk Management Forum (RMF).
14. The Risk Management Strategy 2024-2029 introduces several changes from the previous version:
 - It articulates four strategic objectives to be delivered over five years, aligned with the Corporate Plan and People Strategy:
 - An agile and effective risk management approach
 - Enhanced risk culture
 - Informed decision-making
 - An appetite for risk

- It includes an action plan to guide efforts to achieve these strategic objectives.
 - It provides measurements to assess the progress and success of the strategy.
 - It separates the overarching Risk Management Strategy from the Risk Management Policy document. The policy, being updated in FY24/25, will outline the City Corporation's risk management structure and processes, which, along with guidance and training, will help realise the strategic objectives.
15. In Q4, a review of the City Corporation's risk appetite, requested by Members, was conducted by Zurich Resilience Solutions' Risk and Resilience Team. The findings and subsequent work were reported to the Committee in FY2024/25. The Chief Officer Risk Management Group (CORMG) met regularly during this period, with their work on risks and overarching themes feeding into Committee update reports. The challenges and questions raised by Members during committee meetings on risk management were incorporated into CORMG discussions.
16. Throughout 2023/24, the Committee has exercised its oversight role by:
- Receiving and reviewing quarterly risk update reports related to corporate and red departmental level risks, including any corporate risks added or removed from the register and broader risk management topics identified by officer governance processes.
 - Conducting deep-dive reviews of individual corporate risks, with six such reviews considered by the Committee in 2023/24.

Counter-Fraud

17. During 2023/24, the Corporate Anti-Fraud team conducted 56 investigations across various fraud disciplines, with an associated value of £977,174. Most of this value pertains to notional or preventative savings.
18. The team has increased its focus on supporting business units to better understand their fraud risks and develop fraud risk registers. This has been achieved through fraud risk workshops, which help design out fraud risks in high-risk areas such as transactional finance operations.
19. Single Person Discount and social housing tenancy fraud remain key risk areas for the Corporate Anti-Fraud team and a concern for the Committee. The team has intensified its use of the London NFI fraud hub, resulting in a 20% increase in referrals due to data-matching in this area. This approach has allowed for continuous auditing of tenant data to identify concerns for further review. It has been particularly successful in early identification of deceased tenants, mitigating the risk of the City not being informed of a tenant's death, and ensuring enhanced vetting of tenancy succession applications to prevent fraud.
20. The City's Counter Fraud team led a pan-London collaboration to address the risk of staff working across multiple permanent and agency roles. This effort resulted in the release of 968 referrals to 26 London NFI Fraud Hub members for further investigation.

Financial Reporting

21. Considerable progress was made in clearing the outstanding statements of accounts during 2023/24. At the beginning of the year, the 2020/21 City Fund and Pension Fund Statements had been approved back in November 2021, but the final sign-off was delayed due to a late query regarding the accounting of infrastructure assets, which was a national issue. This technical issue was resolved with the release of temporary variations to the accounting code by CIPFA in January 2023. Consequently, the 2020/21 City Fund accounts were also signed off during 2023/24, in line with the previous approval in 2021, to enable the signing of future years.
22. During the year, the Audit and Risk Management Committee was presented with the audit findings report for City Fund (2021/22) and Pension Fund (2021/22 and 2022/23) at the November meeting. The Audit Findings Report for the City Fund 2022/23 was then presented to the Committee in the February 2024 meeting.
23. The audit findings report for City's Estate (formerly City's Cash) was presented to the Audit and Risk Management Committee in November for the 2022/23 accounts.
24. Having completed its review, the Audit and Risk Management Committee recommended approval of the 2022/23 statements to the relevant Committees and trustees as follows:
 - Statements for City Fund and Pension Fund accounts (2021/22 and 2022/23) at the November 2023 meeting.
 - Statements for City's Estate, the City's Estate charities, City Bridge Foundation (formerly Bridge House Estates), and 14 sundry trusts at the November 2023 Committee meeting.

Other Work of the Committee

25. The Nominations and Effectiveness Sub-Committee of the Audit and Risk Management Committee conducted a review of the Committee's effectiveness and skills in early 2024, a review that had not been conducted since 2018. The results from the Effectiveness and Skills Review exercise show that the Audit and Risk Management Committee is generally perceived to be performing effectively, but with certain areas that could benefit from addressing. Two potential methods to address this are through an action plan and more regular training and support arrangements.

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

DATED this 27th day of November 2024.

SIGNED on behalf of the Committee.

Alderman Prem Goyal
Chairman, Audit and Risk Management Committee

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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 5th December 2024

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

Statutory Instruments

In Force

London Port Health Authority Order 2024

Updates the geographic definition of the London port health district and confirms that powers conferred on the Common Council of the City of London as port health authority by other enactments (which are also updated in this Order) continue to be exercised by the authority as constituted by this Order.

7th November
2024

Financial Services and Markets Act 2023 (Consequential Amendments) Regulations 2024

Updates a schedule to the Act such that the Financial Conduct Authority may make rules in relation to pre- and post-trade transparency obligations.

Between 1st
December 2024
and 1st
December 2025

Local Authorities (Rental Auctions) (England) and Town and Country Planning (General Permitted Development) (Amendment) Regulations 2024

Sets out the process to be followed when a local authority exercises the powers given to it in Part 10 of the Levelling Up Act 2023 to arrange for a rental auction to be carried out in respect of qualifying high-street premises. Requires authorities to consult on any proposal to designate a high street, or to vary or withdraw an existing designation. The forms to be used are also set out.

2nd December
2024

Representation of the People (Variation of Limits of Candidates' Election Expenses) (City of London) Order 2024

Increases the maximum amounts of candidates' election expenses at a ward election and an election by liverymen in common hall in the City of London.

4th December
2024

Official Controls (Import of High-Risk Food and Feed of Non-Animal Origin) (Amendment of Commission Implementing Regulation (EU) 2019/1793) (England) (No. 2) Regulations 2024

8th December 2024

Updates the list of food and feed of non-animal origin from certain third countries which will be subject to a temporary increase of official controls at border control posts and control points.

Financial Services (Gibraltar) (Amendment) (EU Exit) Regulations 2024

16th December 2024

Post Brexit Regulations that extend by 12 months the transitional arrangements which enable some categories (for example insurance and credit intermediaries) of Gibraltar-based firms to provide financial services in the United Kingdom, and facilitate the access by similar types of UK-based firms to Gibraltar's financial services market.

Financial Services and Markets Act 2023 (Commencement No. 8) Regulations 2024

Between 31 December 2024 and 6th July 2026

Commences the revocation of the assimilated EU law under which the London Interbank Offered Rate (LIBOR) is recognised as a critical benchmark. This Regulation removes LIBOR as a critical benchmark. Gives the FCA the power to make rules relating to pre- and post-trade transparency requirements for fixed income instruments and derivatives. Other revocations and replacements include those relating to providing information for transparency calculations 1st December 2024,

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

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