

CONSULTATION ANALYSIS

City of London Corporation
Statement of Licensing Principles Review 2025

1. Consultation Background

The City of London Corporation carried out a public consultation on its draft Statement of Licensing Principles using the Commonplace platform. The Consultation ran from the 17th September 2024 to the 15th October 2024.

The Corporation directly invited by email the Elected Members of the City, resident groups and Responsible Authorities to make comment on the proposed policy.

2. Executive Summary

The consultation for the Statement of Licensing Principles generally confirmed the viewpoints used to establish the prior policy. The question set used was identical to the those set out in the Local Area Risk Assessment.

Gambling-related harm was indicated to be made up of the same components and vulnerable people were consistently indicated to be non-specific and a concern across a myriad of groups, in keeping with the results published in the 2022 Local Area Risk Assessment.

A further submission was received from the Betting and Gaming Council, which will be kept on file until the full policy review. The submission focusses on redrafting elements of the policy to change a policy presumption from “perceived need” to “clear evidence of risk”. The other element is regarding increasing awareness for applicants suggested measures and how those are presented to the Corporation.

3. Consultation Responses

Not every respondent answered every question. The questions asked in the consultation are listed and summarised below, with the respondent conclusion to the question listed and a rounded percentage figure to illustrate the bias for this conclusion.

The consultation portal page was visited 135 times; and received 15 contributions from 9 individual respondents.

A written response was also received from a business group that represents licensed premises.

Demographic of Respondents

As above, not every respondent answered every question. Some respondents also picked multiple categories. The full respondent demographic data is illustrated below the summary by charts.

Link to the area

Predominantly respondents to the consultation work in the area (33%) or visit the area (33%).

Gender

All of the respondents that answered this question were male (100%).

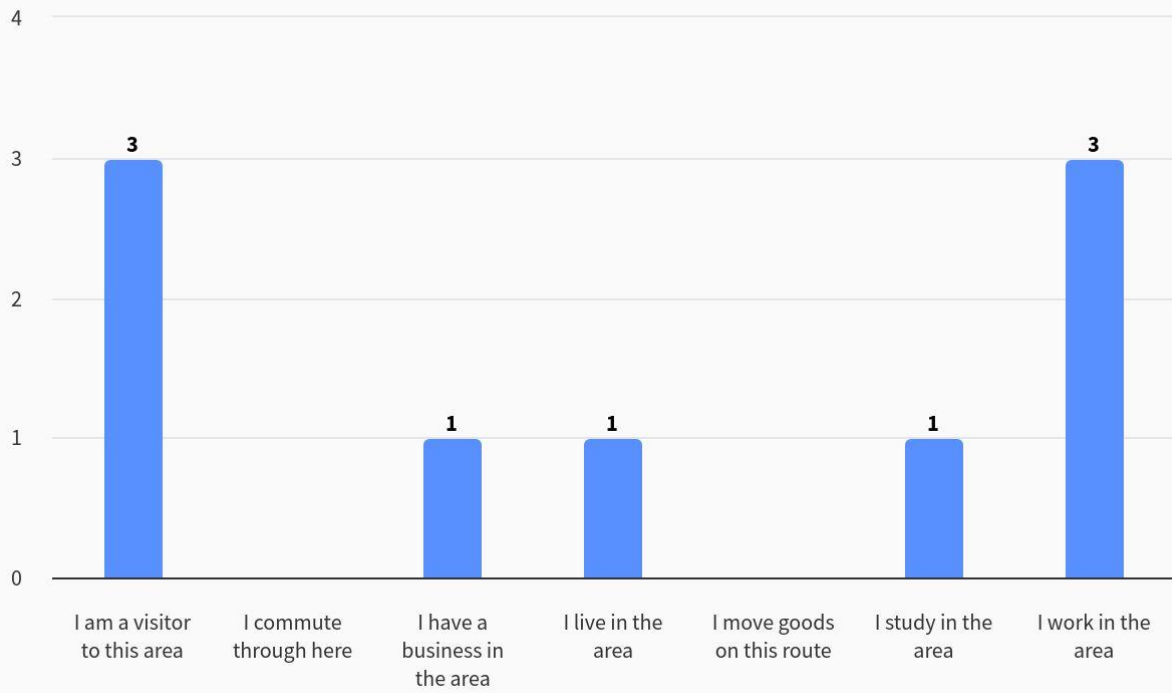
Employment Status

Predominantly respondents to the consultation were retired (44%).

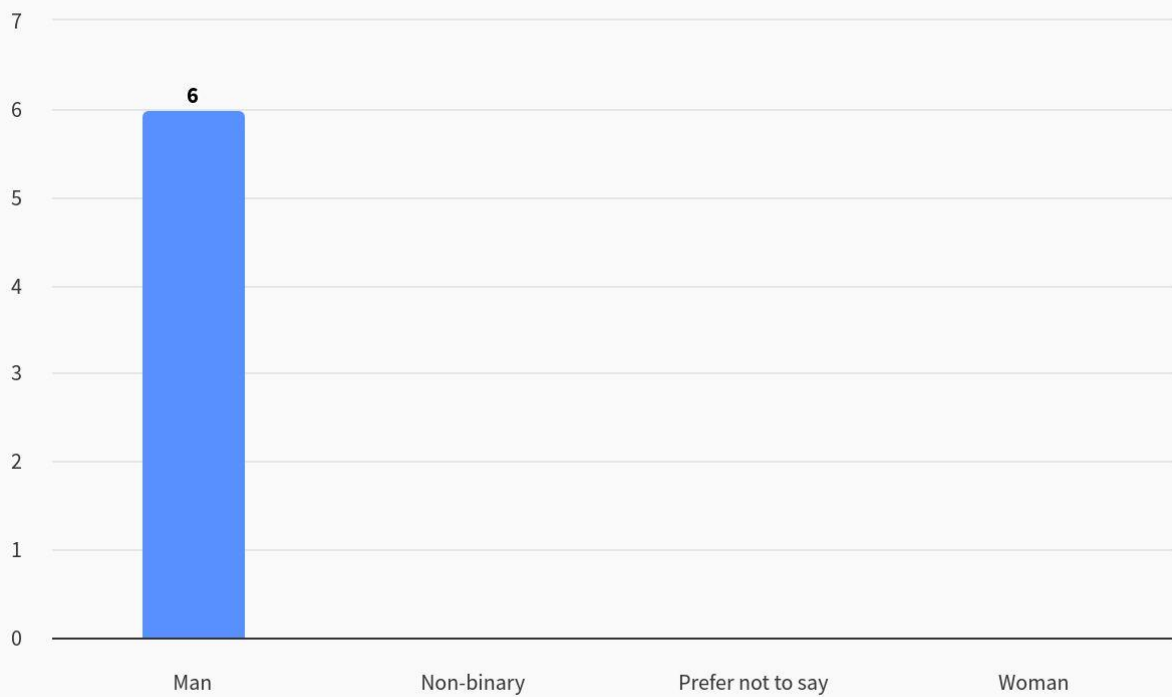
Travel in the Area

Predominantly respondents to the consultation walk (33%) or cycle (33%) through the area.

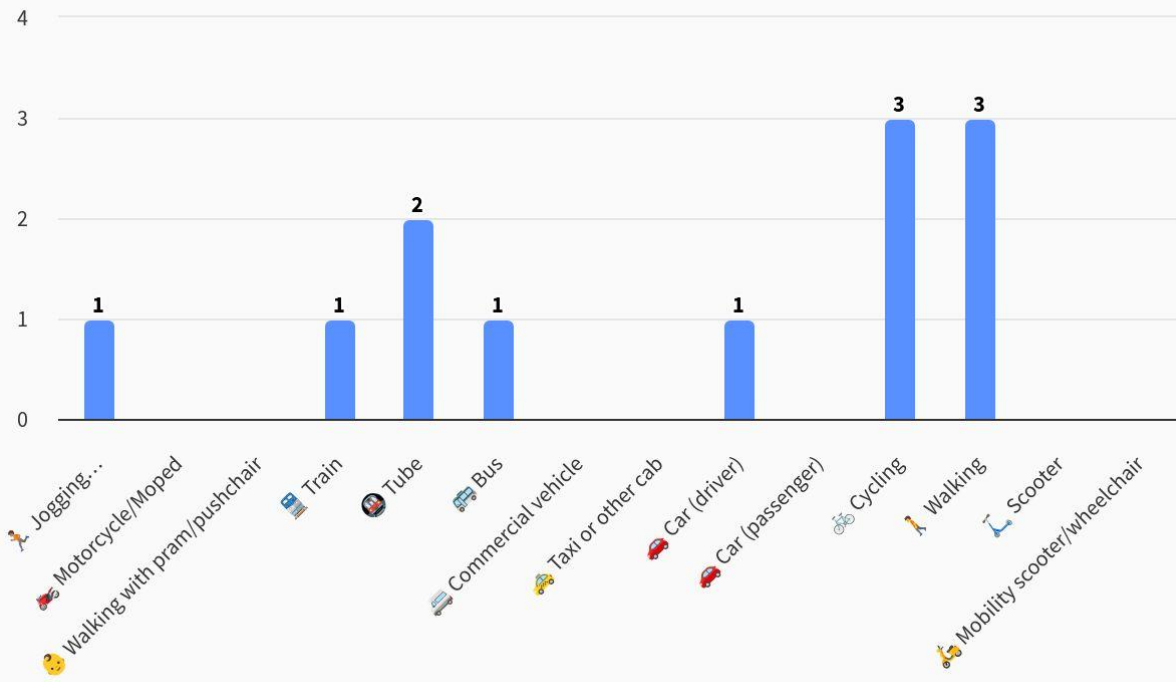
What is your connection to the area?



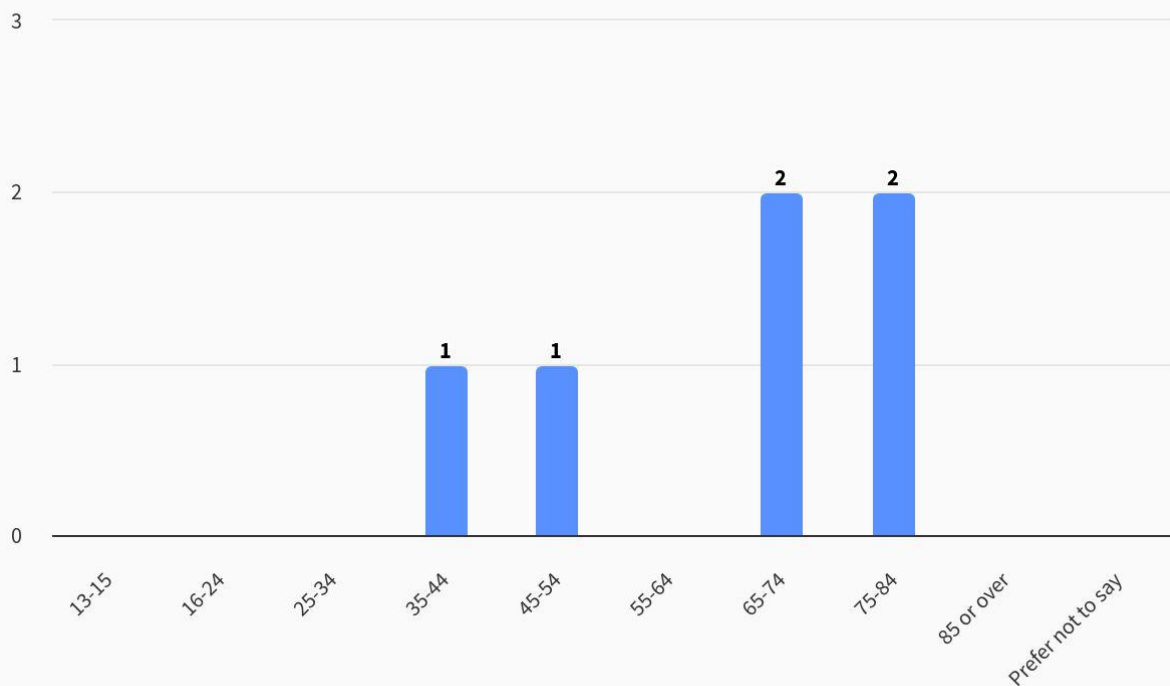
What is your gender?

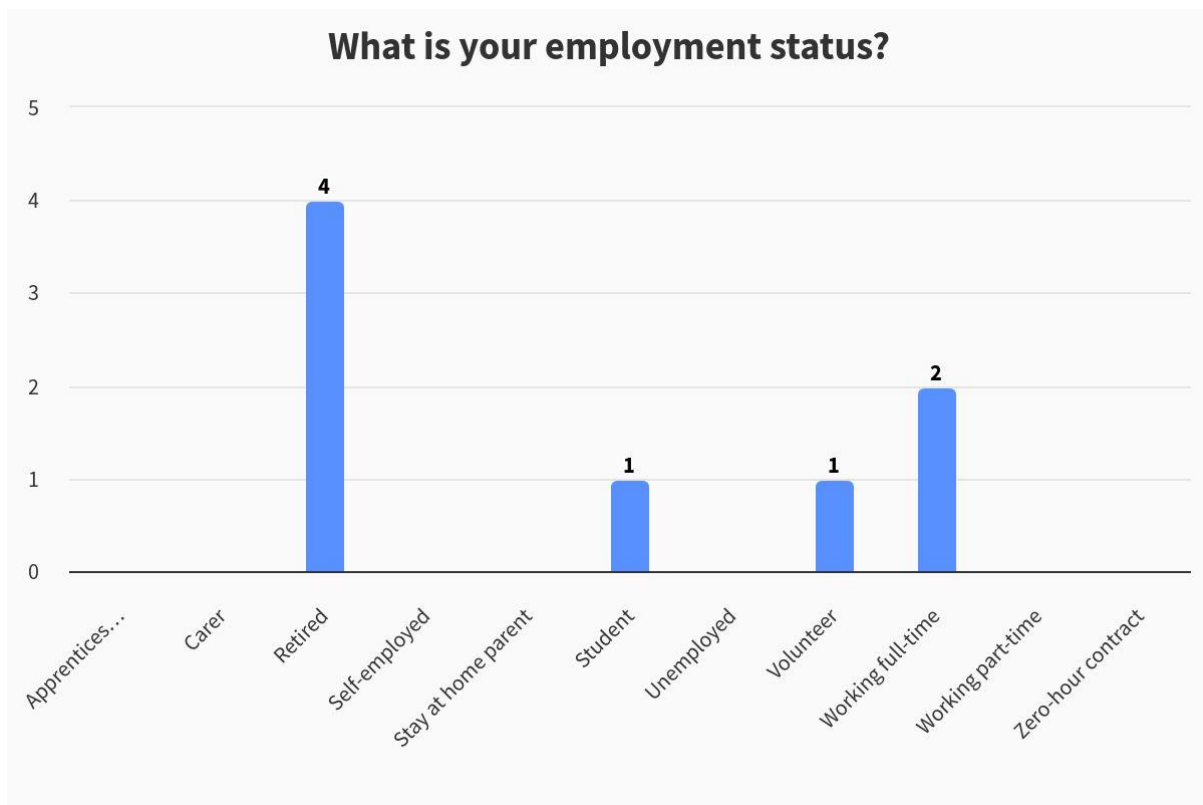


How do you usually travel in or around the area?



What is your age group?





4. Question Set 1: Gambling-Related Harm

Summary

Primarily, respondents believed gambling-related harm to be a negative financial impact to a person, often stemming from an addiction to gambling; with both direct and indirect impact on the person, their social relationships, and their community. Some respondents felt that problem gambling was gambling that a person was unable to control, that results in gambling-related harm. It was also summarised as problem gambling being the “cause” and gambling related-harm being the “effect”.

Generally, respondents felt that the two were intrinsically linked, and so closely related that the differences was semantic. Others felt that they were categorically different, and each measured by different metrics.

The respondents seemed to share a consensus that all of the harms listed within the question set were harms that arose from gambling.

The majority of respondents felt that the prior selected harms affected every age group, and every gender. The respondents also felt that all of the listed types of gambling-related harms that may be seen from person to person were applicable.

71% of respondents felt that there was an indefinite time period over which harm might be experienced. Two locations were identified as areas that were most likely to experience gambling related harm. They were Bishopsgate and Cheap; both of which were nominated by 1 respondent.

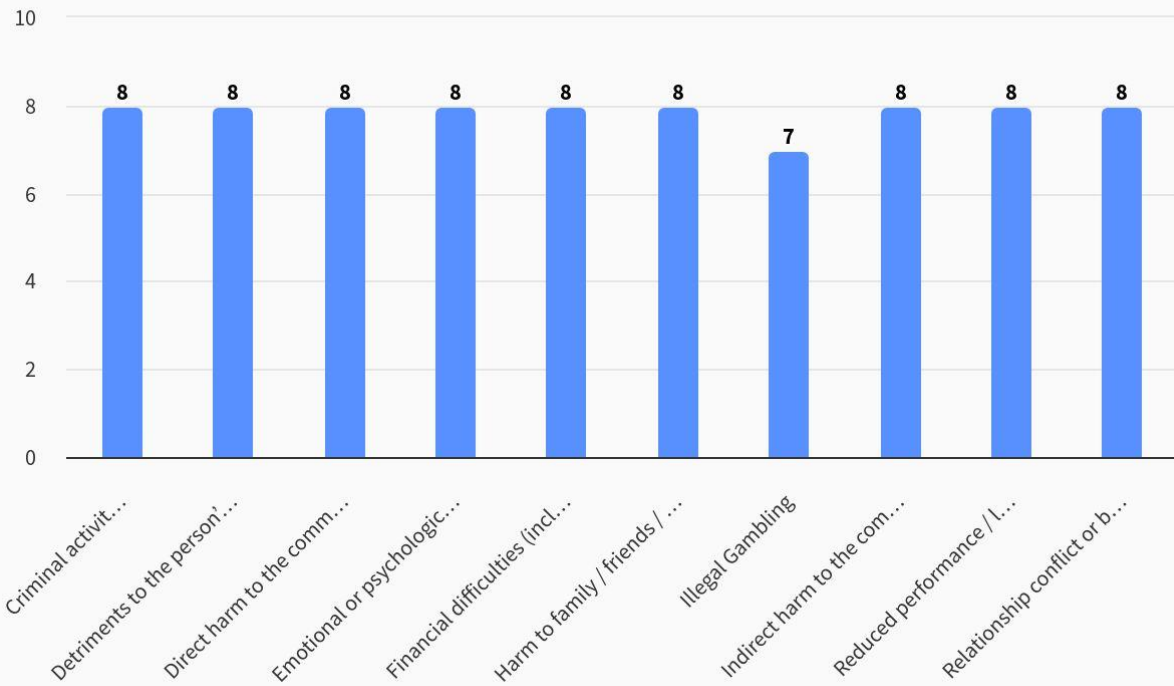
1. What does the term gambling-related harm mean to you?



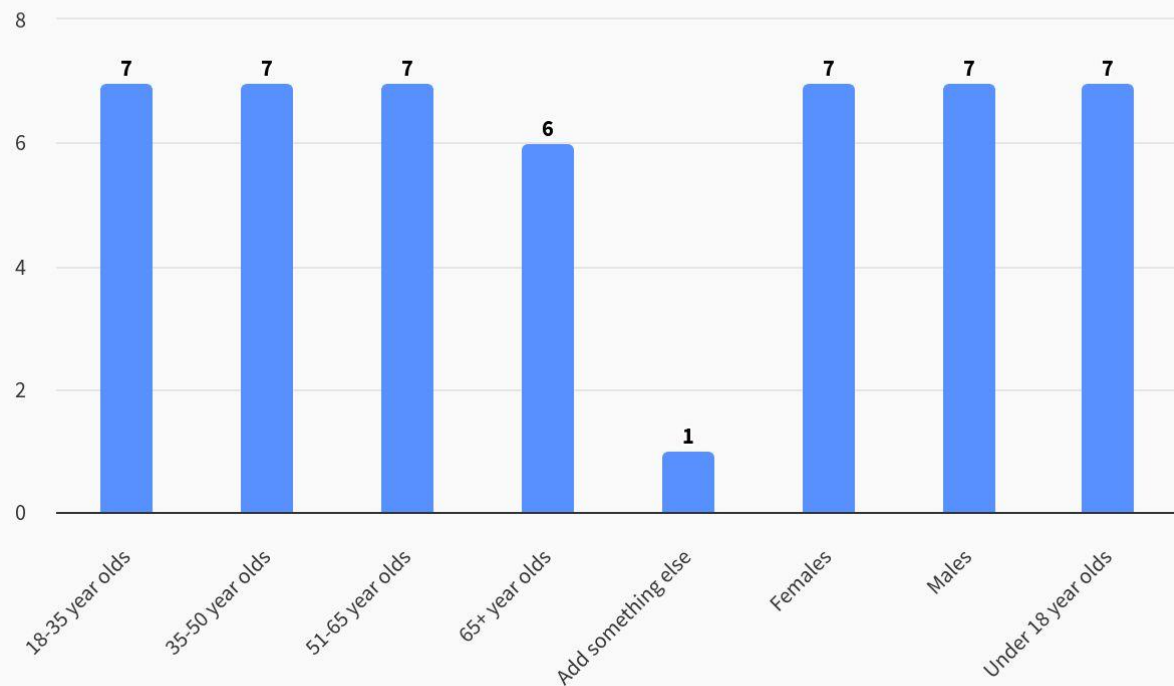
2. How does this differ from problem gambling?



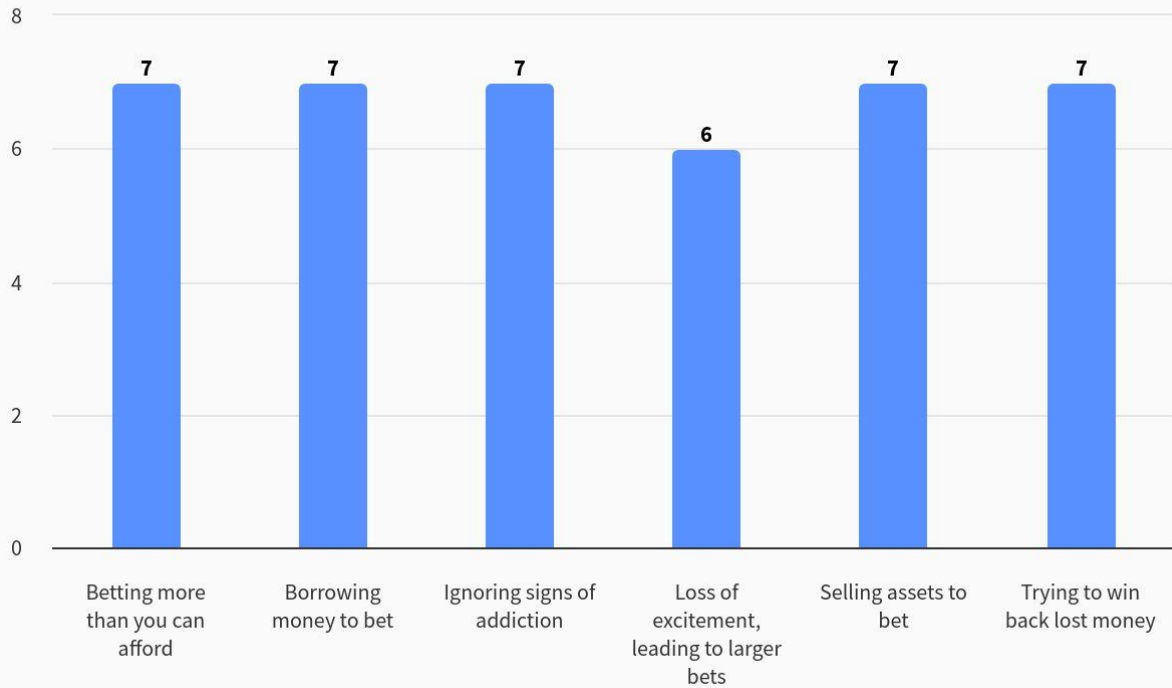
4. What different types of harms arise from gambling?



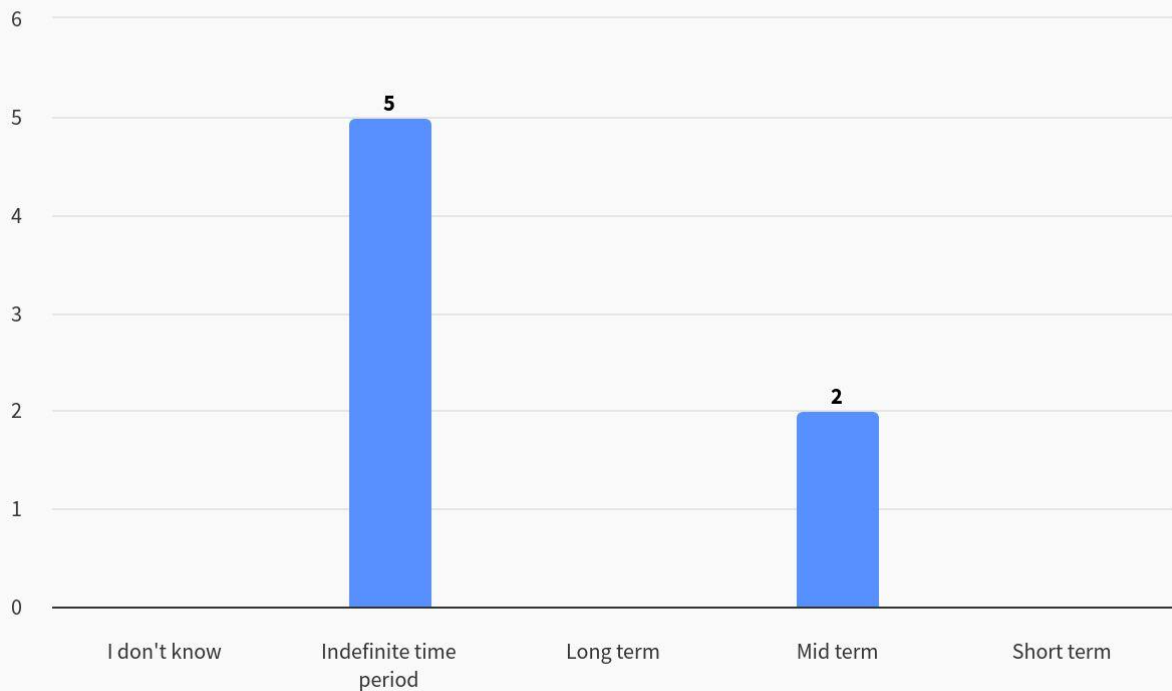
5. Who do these different harms affect?



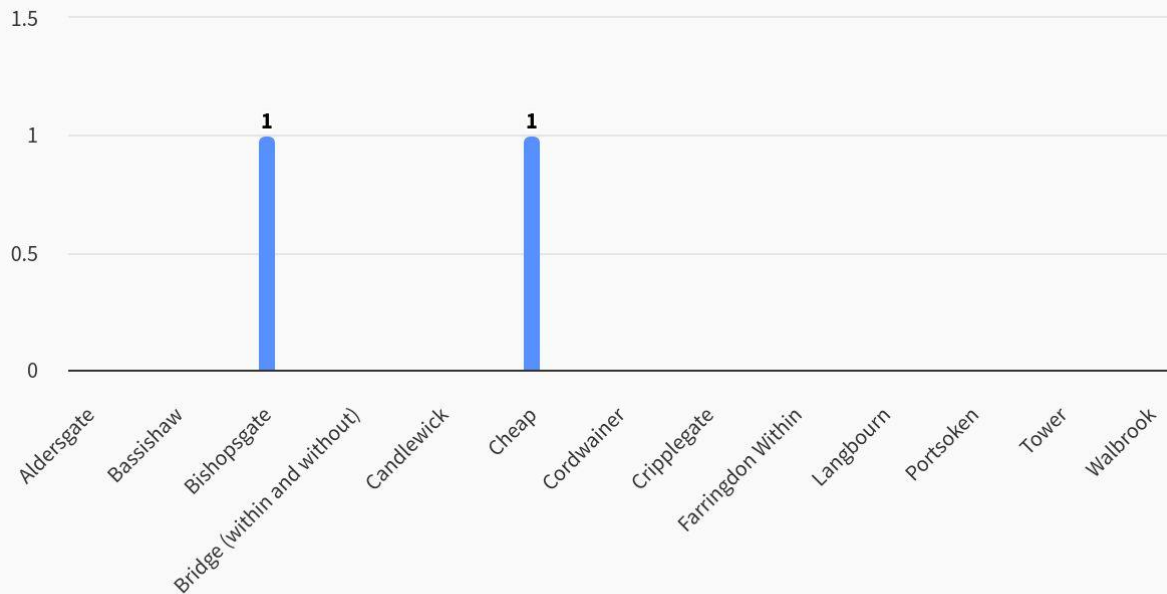
6. How might harms vary from person to person?



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.



5. Question Set 2: Vulnerable People

Summary

Only four respondents answered this section of the consultation. Respondents felt that vulnerability was identified by a lower resistance to forms of harm, those that need support physically, mentally or both, and those that are unduly influenced by advertising or believe they can win at gambling in the long term.

Generally, people felt that the definition of vulnerability was synonymous with its identifiers. Two respondents identified that they interact with young people, and no other respondents listed a vulnerable group that they interact with.

Respondents felt that measures that might be used to protect vulnerable people should include major restrictions on gambling stimuli (in the context of the psychology underlying gambling), restrictions on advertisements and the real time monitoring of gambling.

Respondents felt that those measures would protect most groups, from problem gaming; and that all groups were equally at risk of harm. Respondents felt that the most vulnerable group to gambling-related harm were those with special educational needs.

Respondents also indicated the following characteristics for those who were vulnerable to gambling related harm:

- Addictive personality

- Deprived or poorer communities
- Lack of support mechanisms
- Suffering emotional trauma
- Lower level of education

Generally, respondents felt that the characteristics of who is vulnerable haven't changed over the past 10 years.

10. What does the term 'vulnerable people' mean to you/your organisation?

general need treated potentially fact
 longterm vulnerability present
 seen understanding sympathetic trouble
 behaviour think people approach
 addictive win require gambling
 includes context #9
 vulnerable particular propensity

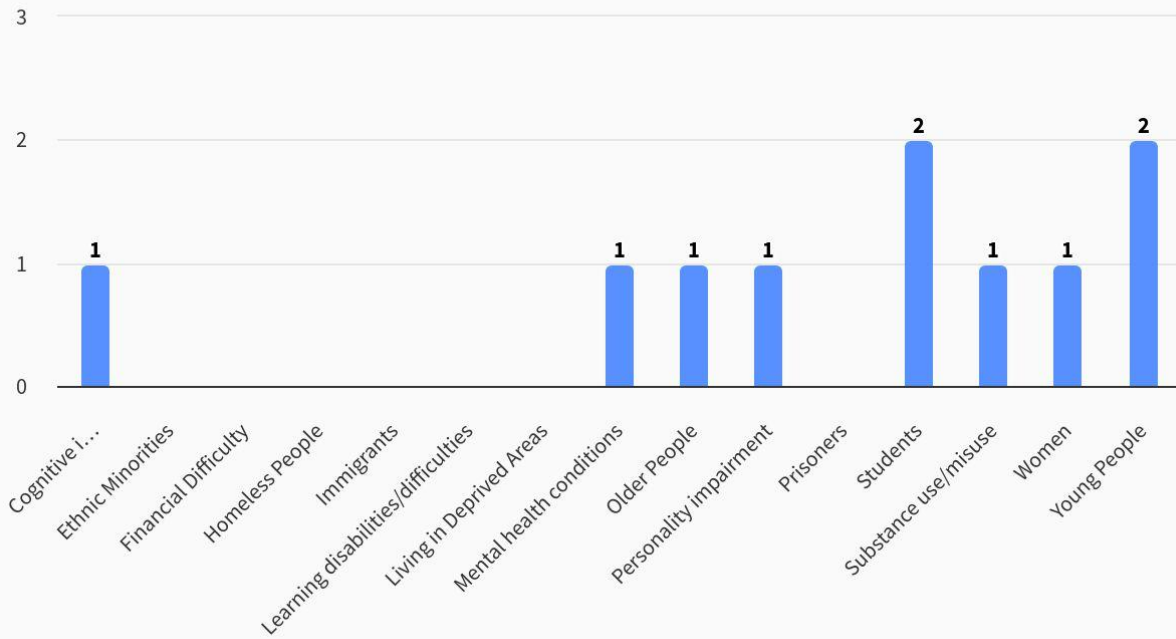
9. How would you identify vulnerability?

popping flutter geegees clearly broken focus physically resistance
hypermasculine behaviour suggesting opposite high
physical exact include industry deliberately plays power thinking
gamble control lives especially advertising mental
harm inside struggle target shop
gambling people parties need
lack images vulnerable men status longterm
quick scene influence negative undue bravery forms
mentally vulnerabilities weaknesses reality allure sexual win
particular betting street heartbreaking lower support direction
social

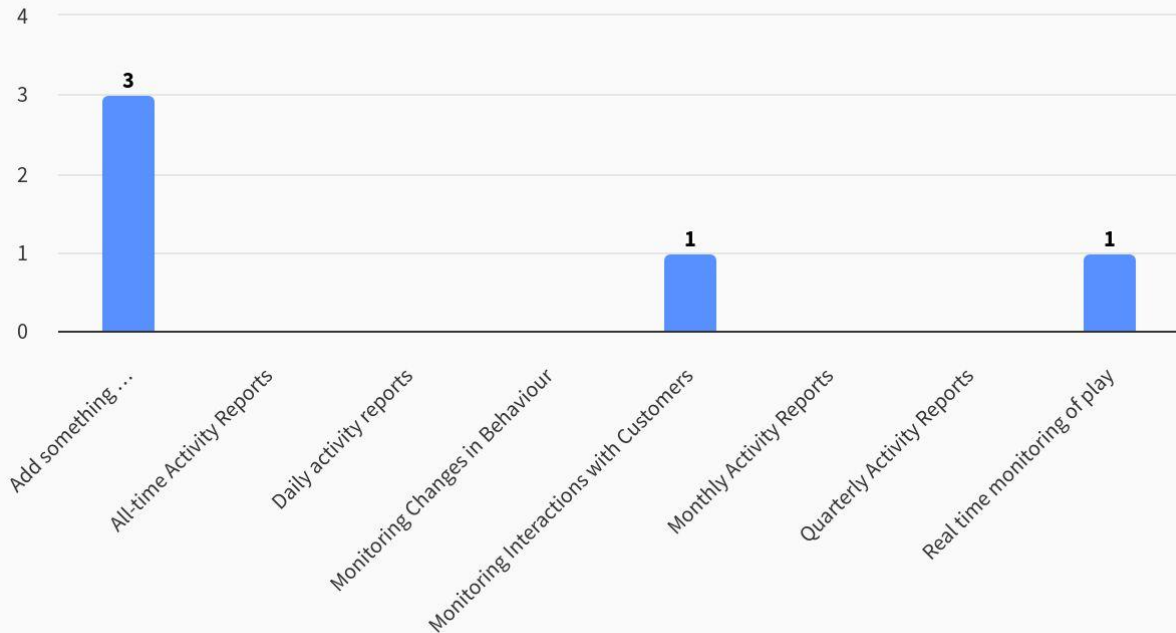
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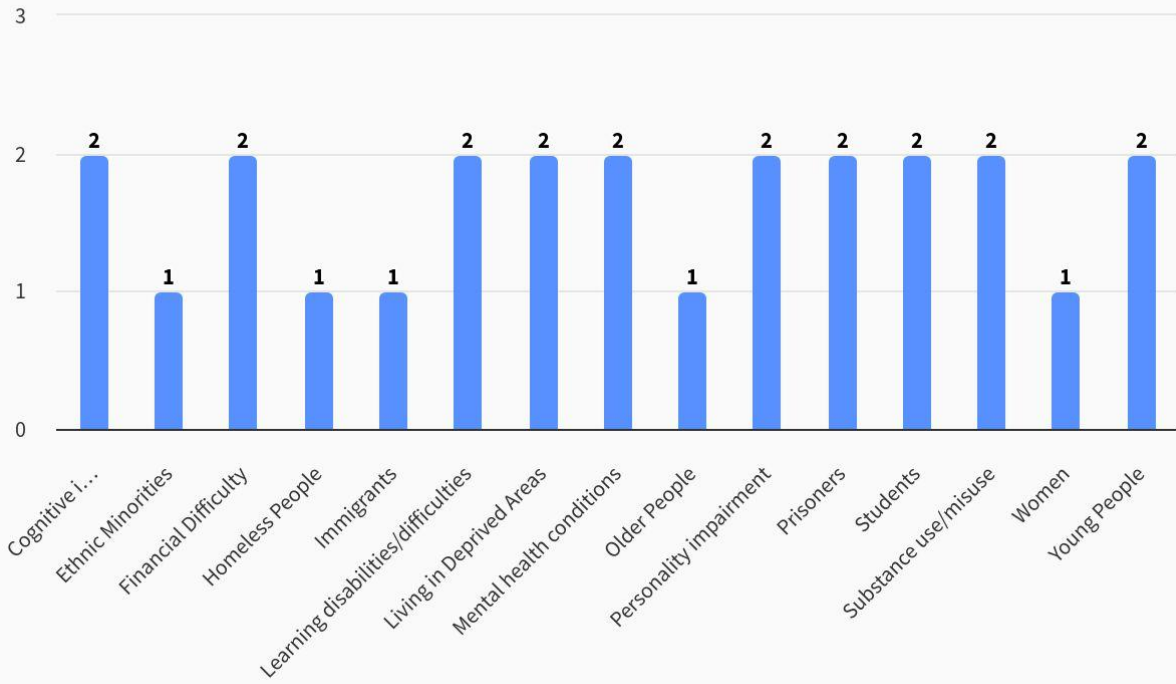
11. What type of vulnerable groups do you/your organisation interact with?



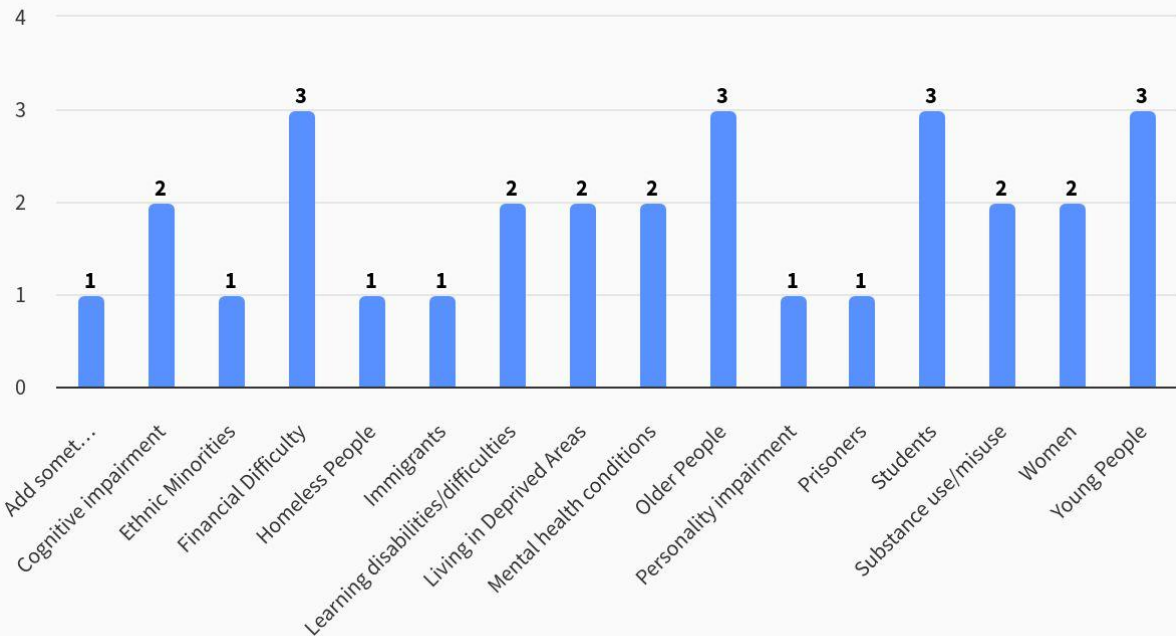
12. What measures might be used to protect vulnerable people?



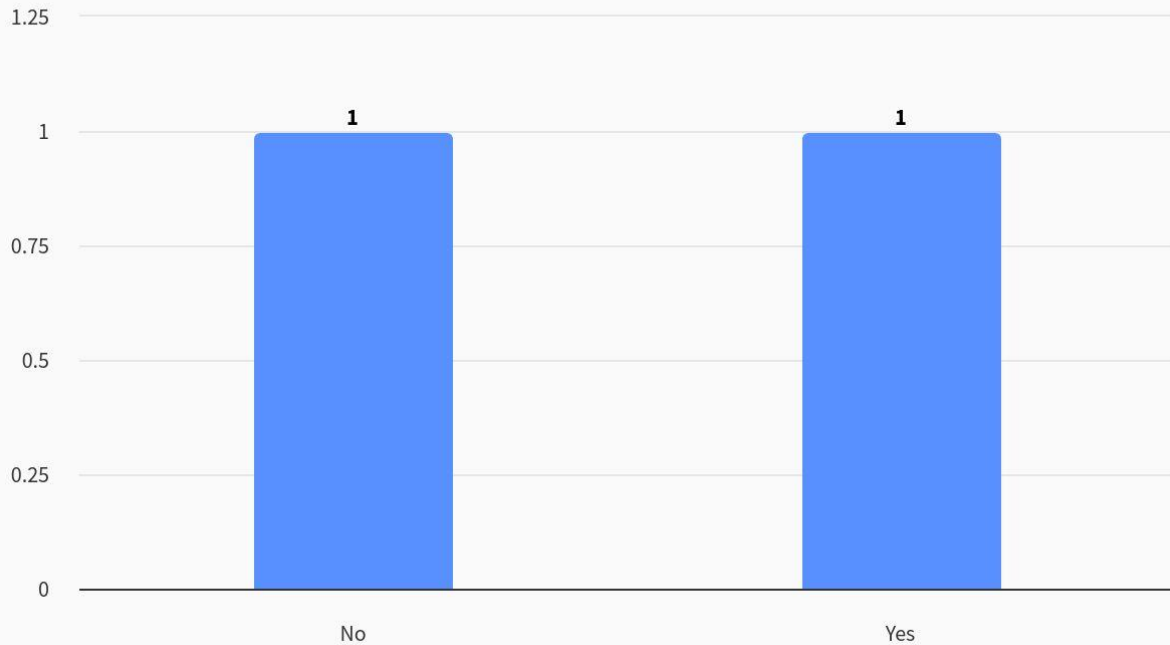
13. Which groups specifically?



14. Who would you consider to be vulnerable to gambling-related harm?



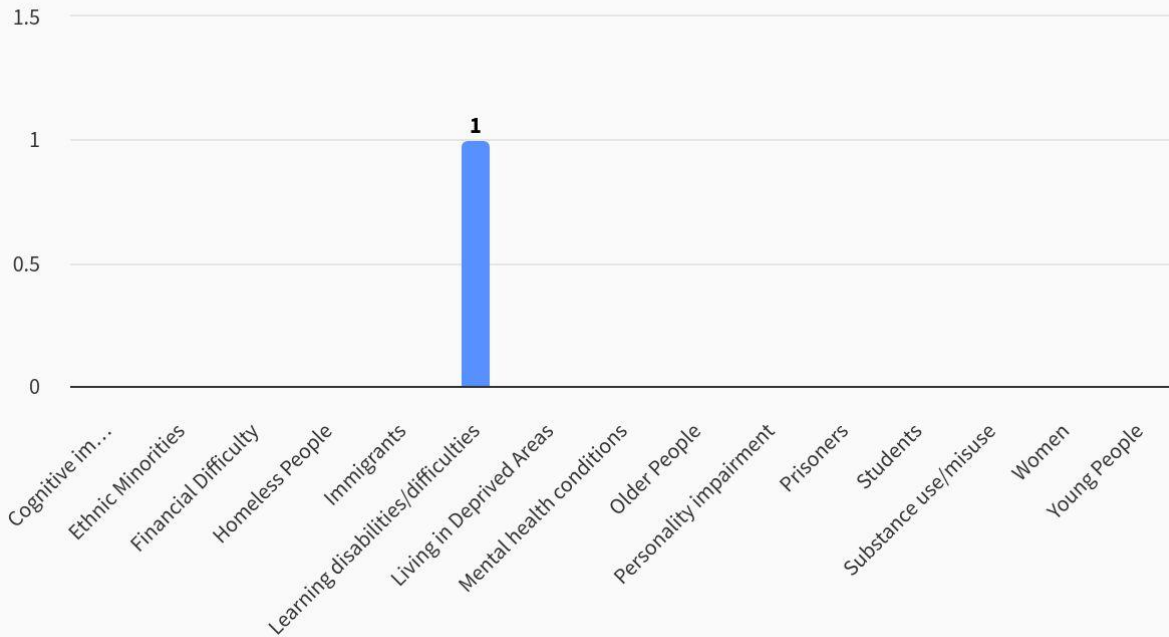
15. Are these groups different to those who are vulnerable to gambling problems?



16. Why is that? Is this evidence based?

effects people directly
semantics harms affect
gambling observational involved
gamblingrelated evidence gamblers
essentially problems include

17. Which group do you think is most vulnerable to gambling-related harm?



19. How do you think the characteristics of who is vulnerable have changed over the last 10 years?

media important
mechanisms know
social evolved
dont

6. Question Set 3: Other Summary

Generally, respondents felt that there was a conflict between the Local Authorities licensing function and the objective of protecting vulnerable people. Respondents also felt that advertising and sponsorship needed to be more tightly restricted.

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?

yes protected adequately

vulnerable

ing protect **people**

21. Is there anything else you would like to add on this topic?

sponsorship

advertising

gambling

blair

laws huge

relaxed damage

restricted **socalled** including

7. Submission from Industry Body

The Betting and Gaming Council provided a lengthy response to the statement of licensing principles, which can be summarised as below:

1. Clarification that the conditions attached to a premises licence shall only be attached when the standard Gambling Commission conditions have failed to uphold the licensing objectives and not when there is only “perceived need”.
2. That the section of the policy on adult gaming centres and licensed family entertainment centres should be redrafted to ensure it is clear that applicants should outline their suggested measures in their risk assessment, and not their application form.

This representation will be kept on file for use at the point of redevelopment of the policy. There is currently no need to redraft the policy as there is no prejudice towards applicants at this point in time.