



AGENDA FOR THE LICENSING COMMITTEE

A meeting of the Licensing Committee will be held in Committee Room 4, Town Hall, Upper Street, N1 2UD on, **17 November 2022 at 7.30 pm.**

Enquiries to : Jackie Tunstall
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Despatched : 9 November 2022

Membership

Substitute Members

Councillor Angelo Weekes (Chair)
Councillor Valerie Bossman-Quarshie
(Vice-Chair)
Councillor Paul Convery
Councillor Joseph Croft
Councillor Phil Graham
Councillor Ernestas Jegorovas-
Armstrong
Councillor Anjna Khurana
Councillor Ben Mackmurdie
Councillor Praful Nargund
Councillor Matt Nathan
Councillor Asima Shaikh
Councillor Marian Spall
Councillor Heather Staff
Councillor Nick Wayne
Councillor Flora Williamson

Quorum: is 4 Councillors

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A.	Formal Matters	Page
1.	Apologies for Absence	
2.	Declarations of Interest	

If you have a **Disclosable Pecuniary Interest*** in an item of business:

- if it is not yet on the council's register, you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent;
- you may **choose** to declare a Disclosable Pecuniary Interest that is already in the register in the interests of openness and transparency.

In both the above cases, you **must** leave the room without participating in discussion of the item.

If you have a **personal** interest in an item of business **and** you intend to speak or vote on the item you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent but you **may** participate in the discussion and vote on the item.

***(a) Employment, etc** - Any employment, office, trade, profession or vocation carried on for profit or gain.

(b) Sponsorship - Any payment or other financial benefit in respect of your expenses in carrying out duties as a member, or of your election; including from a trade union.

(c) Contracts - Any current contract for goods, services or works, between you or your partner (or a body in which one of you has a beneficial interest) and the council.

(d) Land - Any beneficial interest in land which is within the council's area.

(e) Licences- Any licence to occupy land in the council's area for a month or longer.

(f) Corporate tenancies - Any tenancy between the council and a body in which you or your partner have a beneficial interest.

(g) Securities - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

This applies to **all** members present at the meeting.

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B.	Items for Decision	Page
1.	Licensing Policy 2023-2027	3 - 92
2.	Gambling Premises Licensing Policy 2023-2026	93 -154

C. Urgent non-exempt items

Any non-exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

D. Exclusion of press and public

To consider whether, in view of the nature of the remaining items on the agenda, any of them are likely to involve the disclosure of exempt or confidential information within the terms of Schedule 12A of the Local Government Act 1972 and, if so, whether to exclude the press and public during discussion thereof.

E. Urgent Exempt Items (if any)

Any exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

Agenda Item 3

London Borough of Islington

Licensing Committee - 31 May 2022

Minutes of the meeting of the Licensing Committee held at on 31 May 2022 at 6.20 pm.

Present: **Councillors:** Angelo Weekes (Chair), Valerie Bossman-Quarshie (Vice-Chair), Phil Graham, Ernestas Jegorovas-Armstrong, Praful Nargund, Heather Staff, Nick Wayne

Councillor Angelo Weekes in the Chair

1 APOLOGIES FOR ABSENCE (Item 1)

Apologies for absence were received from Councillors Paul Convery, Joseph Croft, Anjna Khurana, Ben Mackmurdie, Matt Nathan, Asima Shaikh, Marian Spall and Flora Williamson.

2 DECLARATIONS OF INTEREST (Item 2)

None.

3 MINUTES OF PREVIOUS MEETING (Item 3)

That the minutes of the meeting held on the 25 May 2021 be confirmed as a correct record and the Chair be authorised to sign them.

4 APPOINTMENT OF THE LICENSING SUB-COMMITTEES FOR THE MUNICIPAL YEAR 2022/23 AND DELEGATION OF LICENSING FUNCTIONS (Item 1)

The Chair reported an amendment to the published papers regarding the Sub-Committee membership.

- a) That four Licensing Sub-Committees be established for the municipal year 2022/2023 with the terms of reference set out in Appendix 1 of the report and that all functions falling within the terms of reference be delegated to them;
- b) That the following members, Chairs and Vice-Chairs, be appointed for the municipal year 2022/2023 or until successors are appointed.

Licensing Sub-Committee A

Members	Substitutes
Councillor Nick Wayne (Chair) Councillor Marian Spall (Vice-Chair) Councillor Praful Nargund	All other members of the Licensing Committee.

Licensing Sub B

Members	Substitutes
Councillor Valerie Bossman-Quarshie (Chair) Councillor Matt Nathan (Vice-Chair) Councillor Ben Mackmurdie	All other members of the Licensing Committee.

Licensing Sub C

Members	Substitutes
Councillor Phil Graham (Chair) Councillor Heather Staff (Vice-Chair) Councillor Anjna Khurana	All other members of the Licensing Committee.

Licensing Sub D

Members	Substitutes
Councillor Angelo Weekes (Chair) Councillor Asima Shaikh (Vice-Chair) Councillor Joseph Croft	All other members of the Licensing Committee.

- c) That it be noted that the following are members of the Licensing Committee and are substitutes for all of the Licensing Sub-Committees.

Councillor Paul Convery
Councillor Flora Williamson
Councillor Ernestas Jegorovas-Armstrong

- d) That the Terms of Reference for the Licensing Committee as set out in Appendix 2 be noted.

The meeting ended at 6.30 pm

CHAIR

Environment Directorate
Public Protection and Regulatory Services
222 Upper Street
London N1 1RE

Report of: Service Director -Public Protection and Regulatory Services

Meeting of: Licensing Committee

Date: 17 November 2022

Ward(s): All

Subject: Licensing Policy 2023-2027

1. Synopsis

- 1.1. Under the Licensing Act 2003 the council is required to publish a statement of licensing policy every 5 years. The purpose of the Licensing Policy is to inform applicants and residents about the way in which the Licensing Authority intends to make decisions about licence applications for the sale of alcohol, regulated entertainment and late-night refreshment and how licenced premises are likely to be permitted to operate.
- 1.2. Over the last nine months the current policy has been reviewed, a revised draft policy has been published and feedback from residents, businesses and partners has been sought through public consultation.
- 1.3. A key component of the Licensing Policy is the designation of 6 cumulative impact areas. These are areas of the borough where the combined effects of a significant number of licenced premises concentrated in one area is likely to undermine the licensing objectives. The council is required to review its cumulative impact policy, consult stakeholders every three years.
- 1.4. The approval of the licensing policy can only be exercised by full Council.

2. Recommendations

- 2.1. To note and confirm the following recommendations to council:
 - 2.1.1. The result of the consultation feedback and to confirm the council's response as detailed in Appendix C
 - 2.1.2. The review of the cumulative impact policy in appendix B and confirm the continuation of its cumulative impact policy for a further 3 years
 - 2.1.3. The amended and revised policy statements in appendix D
 - 2.1.4. Adopt the Licensing Policy 2023-2027 for Islington, attached in Appendix A.
 - 2.1.5. Agree that the Policy shall apply to all applications for a premises licence or club certificate submitted after 1 January 2023

3. Background

- 3.1. The Licensing Policy applies to activities that are licenced under the Licensing Act 2003 which include:
 - the retail sale of alcohol
 - the supply of alcohol by or on behalf of clubs
 - the provision of late-night refreshment
 - the provision of regulated entertainment in for an audience in excess of 500 or provided after 11pm.
- 3.2 Regulated entertainment includes late night or large premises providing:
 - recorded music
 - live music
 - films
 - performance of dance or plays
 - indoor sporting events
- 3.3 As a Licensing Authority, the council has a statutory duty to make licensing decisions, including determination of licensing policy, that are consistent with one or more of the following licensing objectives:
 - Preventing crime and disorder
 - Securing public safety
 - Preventing public nuisance
 - Protecting children from harm
- 3.4 Since the council became responsible for licencing premises under the Licensing Act 2003 there has been a gradual year on year increase. The following tables provide data on the number and types of premises and applications during the period covered by the 2018-2022 Licensing Policy

The table below shows the number of licence premises in 2018 and 2022:

Licence Type	2018	2022	% increase
Alcohol sales	1169	1365	17%
Late night refreshment or regulated entertainment only (not alcohol)	119	122	2.5%
Total Number of Licence Premises	1288	1487	15%

3.5. The table below shows the number, type of new and variation applications received during the period 1 April 2017 and 31 March 2022 and the outcome

Applications	Numbers
New Applications	388
Variation Applications	94
Granted	482
Refused	42

The Licensing Policy Review Process

- 3.6 The review process has been led by the Executive Member for Community Safety and the Chair of Licensing Committee and Members of the Licensing Committee. The Police, Trading Standards, Environmental Health (Noise and Public Safety), Public Health and Community Safety have also been consulted and invited to contribute to the policy review.
- 3.7 Members and partners were satisfied that licensing policies had achieved both council and licensing objectives and that the majority of policies should remain in place for a further five years, subject to formal consultation with businesses and residents, but recognised that a number of changes were required to reflect current and emerging trends.

Key Licensing Policy Changes

- 3.8 The consultation process sought views on making the following changes to the Licensing Policy:

- Amending policy 6 covering opening hours to remove special status given to Archway and Clerkenwell as their needs can be considered within the existing framework.
 - Amended policy 8 to update the standards of management we expect from licensees.
 - Suggesting a new policy 9 to encourage applicants to include in applications how they will support equality and inclusion.
 - Updating policy 21 to reflect the changes in approach we as a licensing authority have adopted to secure the safeguarding of young adults, women, and vulnerable people.
 - Amending policies 22 and 25 to reflect the need for applicants planning to deliver food and alcohol from licensed to take account of the nuisance to residents
 - Amending Policy 26 to include measures that we expect applicants to put in place if they are proposing to use outside space or public land
 - Suggesting a new Policy 28 to indicate how applicants can support climate emergency and the council's ambition to make Islington a net zero carbon zone by 2030.
- 3.9 Prior to including Licensing Policies 9 (Equality and Inclusion) and 28 Environmental Best Practice in Licenced Premises in the draft 2023-2027 policy Legal Service sought counsel opinion. The specialist Licensing QC advised that these inclusion and wording of these two statements was reasonable and appropriate.
- 3.10 For ease of reference the amended and revises policy statements are in appendix D

Review of the Cumulative Impact Policy

- 3.7 An integral part of Islington's Licensing Policy are the 6 cumulative impact areas. When the council receives an application for a licence in a cumulative impact area there is a presumption that the council will refuse or impose limitations on applications which are likely to add to the cumulative impact unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives. In cumulative impact areas the onus is on the applicant to demonstrate that their venue will not add to existing problems being experienced by residents, businesses and public services.
- 3.8 The existence of a cumulative impact policy does not affect the Licensing Authority's duty to consider each application on its merits, it cannot refuse applications outright and it can only refuse or impose limitations where representations are received from residents, businesses, or responsible authorities. Where no representations are received the Licensing Act 2003 requires the Licensing Authority to grant the licence.
- 3.9 In 2018 there was an amendment to the Licensing Act 2003 which now requires the council to review its cumulative impact policies every three years, to consult stakeholders on the outcome of the review and publish its reasons for maintaining cumulative impact area.

3.10 Appendix B summarises the review of the cumulative impact policy that was carried out in April 2022. The review considered:

- The impact of cumulative impact policies on applications and outcomes
- Alcohol related crime and disorder
- Complaints about Licenced Premises
- Alcohol Related Ambulance Callouts
- Views of stakeholders and partners

3.11 The conclusion of the review was that the cumulative impact policies had achieved the following objectives:

- To promote the four licensing objectives in a borough which has one of the highest concentrations of licenced premises in England and where there is no delineation between residential and commercial areas
- To enable to Licensing Authority to balance the needs of residents, businesses, and the local economy

The 2022 cumulative impact policy review indicated that the underlying reasons for selecting areas for cumulative impact still existed: there remains a high concentration of licenced premises in specific parts of the borough and these areas continue to be hotspot areas for antisocial behaviour, crime, disorder, licensing complaints and ambulance callouts.

Consultation Responses

3.12 The Licensing Act 2003 specifies who the Licensing Authority must consult with before publishing its Licensing Policy. The statutory consultation and resident engagement programme ran from 18 August 2022 to 4 October 2022.

3.13 The council received 10 responses to the consultation: 6 responses using the online consultation response questionnaire and 4 email responses.

3.14 Overall people who responded to the consultation generally supported the proposals however two changes have been made to the proposed 2023-2027 policy:

3.14.1. Licensing Policy 21 Safe and Secure Venues includes reference to LGBTQ+

3.14.2. Licensing Policy 26 Smoking, drinking and eating outside includes recognition that the use of outdoor spaces helps to ensure the resilience of business's

3.15 The consultation responses and the council response are attached as appendix C

4. Implications

4.1. Financial Implications

4.1.1 The cost of preparing and publishing the revised policies has been met from the existing budget.

4.2. **Legal Implications**

4.2.1 Section 5 of the Licensing Act 2003 requires a licensing authority to prepare and publish a statement of its licensing policy every five years. Before determining its policy, the licensing authority must consult:

- The chief officer of police for the area
- The fire and rescue authority for the area
- The local authority's Director of Public Health
- Persons/bodies representative of local premises licence holders
- Persons/bodies representative of local club premises certificate holders
- Persons/bodies representative of local personal licence holders
- Persons/bodies representative of businesses and residents in the area

4.2.2 In determining its policy, the licensing authority must have regard to the Home Office Guidance and give appropriate weight to the views of consultees.

4.2.3 The cumulative impact of licensed premises on the promotion of the licensing objectives is a proper matter for a licensing authority to consider in developing its licensing policy statement. Once adopted, cumulative impact policies should be reviewed every three years to assess whether they are still needed or if they should be amended in accordance with s5A of the Licensing Act 2003 (as inserted by the Policing and Crime Act 2017).

4.2.4 The Licensing Act 2003 provides that the licensing authority cannot delegate the determination of its licensing policy to the licensing committee. The Local Authorities (Functions and Responsibilities) Regulations 2000 (as amended) provide that this function cannot be discharged by the Executive and should be determined by the full Council

4.3. **Environmental Implications and contribution to achieving a net zero carbon Islington by 2030**

4.3.1. The Licensing Policy identifies issues associated with the consumption of alcohol which have environmental implications – noise, odours, littering and street fouling. The policy seeks to ensure these issues are minimised when granting licences

4.3.2. The new Licensing Policy 28 encourages applicant to

- to provide evidence as to how they will promote environmental protection

- join the council in working towards net zero carbon by implementing a variety of measures listed in the policy

4.4. Equalities Impact Assessment

4.4.1. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

4.4.2. An Equalities Impact Assessment is not required in relation to this report, because the Equalities Impact Assessment Screening Tool indicated that the Licensing Policy 2023-2027 and Cumulative Impact Policy will have a neutral impact on people with identified protected characteristics

5. Conclusion and reasons for recommendations

5.1. The council is required to review and adopted its statement of licensing policy every 5 years. The current policy has been reviewed and a revised draft policy has been the subject of a consultation exercise. The Council is now invited to adopted the Licensing Policy for 2023-2027.

5.2. The council is required to review its cumulative impact policy every three years, consult and then publish its Cumulative Impact Policy

Appendices:

- A Draft Licensing Policy 2023-2027
- B Cumulative Impact Policy and Reasons for Publishing
- C Consultation Feedback
- D New and amended policy statements

Background papers:

- None

Final report clearance:

Signed by: 

Besserat Atsebaha
Service Director - Public Protection and Regulatory Services

Date: 8th November 2022

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Statement of Licensing Policy 2023-2027

Licensing Act 2003

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Licensing Policy 2023-2027

Licensing Act 2003

INTRODUCTION

The Licensing Policy is intended to inform applicants and residents about the way in which the Licensing Authority will make licensing decisions and how licenced premises are likely to be permitted to operate so as to promote the licensing objectives.

We currently have 1483 premises in Islington who are licensed to sell alcohol, provide entertainment such as live music, dancing, plays and film screenings, and sell food late at night / early in the morning. They vary in their offer, with excellent restaurants, live music and non-alcohol led venues as well as bars and clubs, all contributing to both the day and night time economy.

Applications for new licenses or variations of an existing one are made to the council, who are the licensing authority. A consultation process then takes place and any applications receiving representations must be considered by one of our licensing sub-committees.

As a licensing authority, we have a duty to promote the following four licensing objectives and these objectives will underpin every decision that we undertake:

- the prevention of crime and disorder;
- public safety;
- the prevention of public nuisance;
- the protection of children from harm

In reviewing and updating our Licensing Policy, we have seen that alongside the many positive impacts of our night time economy, residents in some areas continue to suffer from nuisance generated by the late night economy and there are high levels of alcohol-related ill health and early deaths in Islington. Evidence shows alcohol consumption is a major factor behind violent crime and disorder in the borough with serious consequences to victims, businesses and local communities.

In 2013 we introduced area based cumulative impact policies and framework hours to manage the negative impacts of the night time economy on residents and public services. Our review of the Licensing Policy in 2017 concluded that these policies had achieved their objectives and should be retained to ensure that the benefits that they had created were maintained, alongside giving guidance to applicants of the types of businesses that could be a positive addition in each area.

Through our Licensing Policy for 2023-2027 we believe we can build upon the success of the last five years by extending and clarifying the guidance to applicants on the sort of applications that might be exceptions to the cumulative impact policy. We want to encourage and support applications that contribute to the day time and evening economy, especially those that will widen socialising opportunities to people visiting, working and living in the borough. This approach is consistent with not only our duty as a Licensing Authority to promote the four

licensing objectives but also with the council's key commitments to creating a safer, fairer borough and key strategic policies on economic development, employment and culture.

Whilst the Licensing Policy should be used as a tool for guiding applicants on Licensing Authority expectations, we will continue to consider each application on its merits and through the Licensing Policy, we will:

- Carefully manage the number of licenced premises supplying alcohol, imposing restrictions where appropriate
- Encourage and support businesses that are unlikely to add to the cumulative impact in terms of crime, disorder and public nuisance
- Seek to promote high standards of management in licensed premises to ensure businesses operate responsibly and the experiences of residents and visitors are not ruined by poorly run businesses both on the premises and in the surrounding environment
- Promote a safe, welcoming and varied evening economy where businesses work with the Licensing Authority and Responsible Authorities
- Safeguard the interests of vulnerable residents and children.

The Licensing Policy is intended as a guide for applicants and residents. The Licensing Authority expects applicants to have regard to the Policy when preparing their application and operating schedule. Applications that are not consistent with the policy are likely to be subject to representations from responsible authorities, ward councillors and local residents.

Representations from residents, ward councillors and responsible authorities should relate to one or more of the licensing objectives and, where possible, provide sufficient information to help the Licensing Committee assess the impact of the application on the licensing objectives.

Where representations are received, the application will be determined by a public hearing of the Licensing Committee and a decision will be made on the merits of the application whilst having regard to the Licensing Policy and the duty to promote the licensing objectives.

As required under the Licensing Act 2003, where no representations are received, applications will be granted on the terms and conditions applied for.

LICENSING POLICY IN CONTEXT

Islington is one of London's most distinctive areas, offering arts, entertainment, good eating and drinking, a huge variety of specialist shops, lively street markets and a rich and fascinating history. The sense of community feel around Islington is one of the things that make this relatively small London borough unique.

The number of people living in the borough is approximately 236,000 according to the Greater London Authority (GLA) and the Office for National Statistics (ONS) 2020. The figure was 206,000 in 2011. Many parts of the borough, which were previously exclusively commercial, have been developed into mixed-use hubs incorporating commercial and residential premises in very close proximity. The council is keen to preserve a diverse mix of premises through the

borough and wants to work with businesses, residents and partners through its Licensing Policy to achieve this.

The Licensing Authority recognises that licensed premises make a significant contribution to the wellbeing of the borough by providing a wide variety of entertainment, arts and cultural activities, business, employment and career opportunities. However, uncontrolled expansion of this sector could provide disproportionately negative benefits for local residents and public services.

It is also a particular feature of Islington that densely populated residential areas are located in very close proximity to commercial areas, and that poorly managed premises can have an immediate impact on nearby local residents.

The council recognises that the evening economy employs a lot of local people and is an excellent route into a career in the hospitality industry. It is also an industry where there is sometimes poor pay and job security. The council offers services to support both residents into good work, but also with employers to help them achieve accreditations such as becoming a Living Wage Employer. Working with the GLA, the council is also examining how we can support night-time workers, including addressing safety concerns both in and after work.

Going forward the Licensing Authority wants to continue to manage any expansion of the late night economy, that is premises trading beyond midnight, as these activities pose the greatest risk of undermining the licensing objectives, whilst supporting well managed businesses that will contribute to the borough's vibrant and diverse evening economy.

SAFER ISLINGTON PARTNERSHIP

The Safer Islington Partnership (SIP) is the body that co-ordinates work on crime reduction and community safety in Islington. It brings together all relevant services and agencies working to reducing crime and disorder in the borough. The partnership decides on local priorities for tackling crime and anti-social behaviour and develops plans and strategies in response. The current priorities for the partnership includes violence against women and girls and antisocial behaviour.

PUBLIC SPACE PROTECTION ORDER (PSPO)

A Public Space Protection Order creates a borough wide controlled drinking zone to help us reduce anti-social behaviour arising from drinking alcohol in the street. The order gives the police and our Operation Nightsafe patrol officers the ability to confiscate alcohol or require a person to stop drinking in public if they are causing a nuisance. The powers do not prohibit drinking in public places, and it can only be used where it is associated with negative behaviour

OPERATION NIGHTSAFE

Operation Nightsafe is a unique partnership between the Licensing Authority, Licenced Trade, the Police and our expert and highly trained delivery partner. It is funded by the Late Night Levy, which is paid by all licenced premises selling alcohol beyond midnight as prescribed in the Police Reform and Social Responsibility Act 2011.

The aim of Operation Nightsafe is to support and promote the late night economy in Islington by:

- providing a safe, welcoming night time environment for residents, workers and visitors
- reducing late night alcohol related crime, disorder, antisocial behaviour and nuisance
- minimising negative impacts on residents

This is achieved by funding:

- a police sergeant and one police constable to coordinate policing the night time economy including follow up enforcement activities
- A partner agency to provide a high visibility street based patrol service 4 nights per week with the capacity to provide assistance to licenced premises and members of the public in need.

DEVELOPMENT PLANNING

Licensing Policy 1

The Licensing Authority expects applicants to ensure that they have planning consent for the intended use and hours of operation, or otherwise have lawful planning status, before making an application for a premises licence.

1. The Planning Consent for a premise determines its use and the hours of operation. If this is not in place at the time the licensing application is heard, there may be a conflict between the two and the applicant will be required to comply with any planning consent granted. It is expected that the necessary planning consent will be in place to ensure that this conflict does not arise, and applicants receive a decision from the licensing process that they can immediately implement.
2. Applicants are advised that prior approval of a licence application is not generally held to be a material consideration when the council determines a planning application.
3. Where the closing time has been set as a condition of planning permission and it is different to the licensing hours, applicants must observe the earlier closing time. The granting of a licence by the licensing committee does not mean the applicant will not need to apply for planning permission. Premises operating without the necessary planning permission will be liable to formal enforcement action that could include but not be limited to prosecution under planning law.
4. Licensing activities will usually need to end before any hours granted through planning consents to ensure there is sufficient time for customers to leave the premises gradually to minimise impact on nearby residents.
5. The process of applying for a licence or varying an existing licence should not be a re-run of the planning process. Where premises have obtained planning permission prior to the submission of a licence application, the determination of the licence will focus on controls necessary to achieve the licensing objectives.

6. Objectors who are dissatisfied with the planning outcome may still make representations through the licensing process, but their representations will only be relevant where they relate to one or more of the following four licensing objectives:
 - the prevention of crime and disorder;
 - public safety;
 - the prevention of public nuisance;
 - the protection of children from harm

7. The council's planning policies are set out in Islington's Development Plan which can be found on our website: <https://www.islington.gov.uk/planning/planningpol>

LOCATION, CUMULATIVE IMPACT AND SATURATION

Licensing Policy 2

In considering applications for new licences, variations to existing licences and licence reviews the Licensing Authority will take the matters listed below into account:

- **whether the premises are located in an area of cumulative impact**
 - **the type of premises and their cumulative impact upon the area**
 - **and the mix of premises in the area**
 - **the location of the premises and character of the area**
 - **the proximity to residential properties**
 - **the views of responsible authorities**
 - **the potential impact on residents living in close proximity to the premises**
 - **past compliance history of current management**
 - **the proposed hours of operation**
 - **the type and numbers of customers likely to attend the premises**
 - **whether the applicant is able to demonstrate commitment to a high standard of management**
 - **the physical suitability of the building proposed for licensable activities, i.e., in terms of safety, access, noise control etc. including a building regulation completion certificate or final certificate where appropriate**
8. Islington has one of the highest densities of licensed premises in England and careful consideration will be given to the need to add to these numbers when applications are received. As there is often no delineation or separation between residential and commercial areas careful management is required to prevent conflict between the different uses.

 9. Applicants should consider the general operating hours in Licensing Policies 5 and 6 and should not try to replicate later opening hours offered by other premises. The Licensing Authority will need to carefully balance the conflicting needs of residents, patrons and businesses in relation to the introduction of premises and flexible opening hours for the sale and supply of alcohol and late night refreshments.

CUMULATIVE IMPACT POLICY AREAS

Licensing Policy 3

The Licensing Authority has adopted a special policy relating to cumulative impact in relation to the supply of alcohol in:

- Clerkenwell
- Bunhill
- Kings Cross
- Upper Street and Angel
- Holloway Road and Finsbury Park
- Archway

This special policy creates a rebuttable presumption that applications for the grant or variation of premises licences or club premises certificates, which are likely to add to the existing cumulative impact will normally be refused following receipt of representations, unless the applicant can demonstrate in the operating schedule that there will be no negative cumulative impact on one or more of the licensing objectives.

10. Cumulative impact is concerned with the potential impact on the licensing objectives of a significant number of licenced premises concentrated in one area. As a borough with one of the highest concentrations of licenced venues in London, this is a significant issue for Islington. Whilst it could be argued that the whole of the borough meets the cumulative impact test, the Licensing Authority has identified six areas in the borough where the threshold for cumulative impact has been met.
11. The circumstances of each application will be considered on its merits and the Licensing Authority shall grant applications where the applicant has demonstrated that the operation of the premises will not add to the cumulative impact on one of more licensing objectives.
12. It must be stressed that the presumption created by this special policy does not relieve responsible authorities or other persons of the need to make a representation. If there are no representations, the licensing authority must grant the application in terms that are consistent with the operating schedule submitted.
13. Applicants will be expected to comprehensively demonstrate why a new or varied licence will not add to the cumulative impact. They are strongly advised to give consideration to mitigating potential cumulative impact issues when setting out steps they will take to promote the licensing objectives in their operating schedule.
14. As a general rule the Licensing Authority does not consider the following criteria as exceptional to the application of its cumulative impact policy:
 - premises will be well managed and run
 - premises will be constructed to a high standard
 - applicant operates similar premises elsewhere without complaint

- similar premises operate in the area

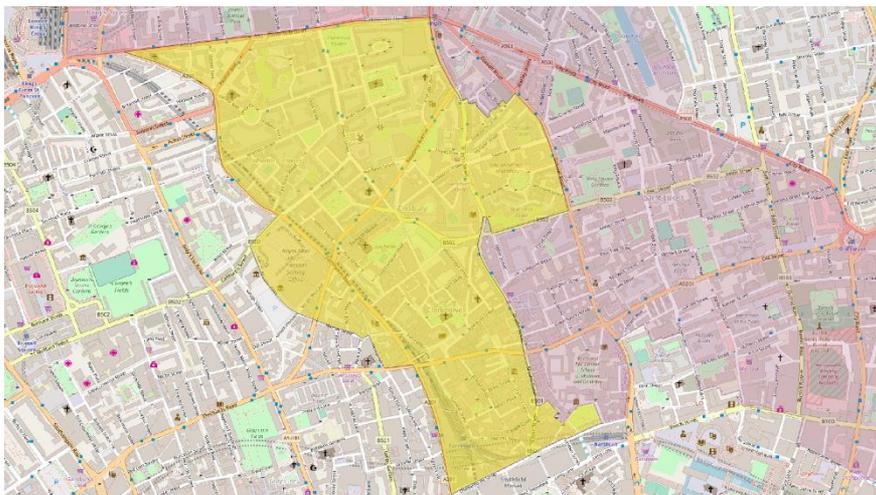
15. After receiving representations in relation to a new or variation application, the licensing authority will consider whether it would be justified in departing from this special policy in the light of the individual circumstances of the case. The impact of an application can be expected to be different for premises with different styles and characteristics. If the licensing authority decides that an application should be refused, it will still need to show that the grant of the application would undermine one or more of the licensing objectives and that conditions or restrictions would be an ineffective solution.

REVIEW OF CUMULATIVE IMPACT POLICIES

16. In determining its draft Licensing Policy for 2023 - 2027 the Licensing Authority has reviewed its cumulative impact policies and is of the opinion that they have provided an invaluable mechanism for ensuring the promotion of the licensing objectives in Islington.
17. The 2022 cumulative impact policy review has indicated the underlying reasons for selecting areas for cumulative impact still exist, there remains a high concentration of licenced premises in specific parts of the borough and these areas continue to be hotspot areas for antisocial behaviour, crime, disorder, licensing complaints and ambulance callouts.
18. The Licensing Authority will publish the Cumulative Impact Policy Review alongside the draft Licensing Policy for 2023-27 to seek the views of business, residents, and their representative organisations over the proposal to retain the existing cumulative impact policies.

CLERKENWELL CUMULATIVE IMPACT AREA

19. The map below shows the Clerkenwell cumulative impact area:



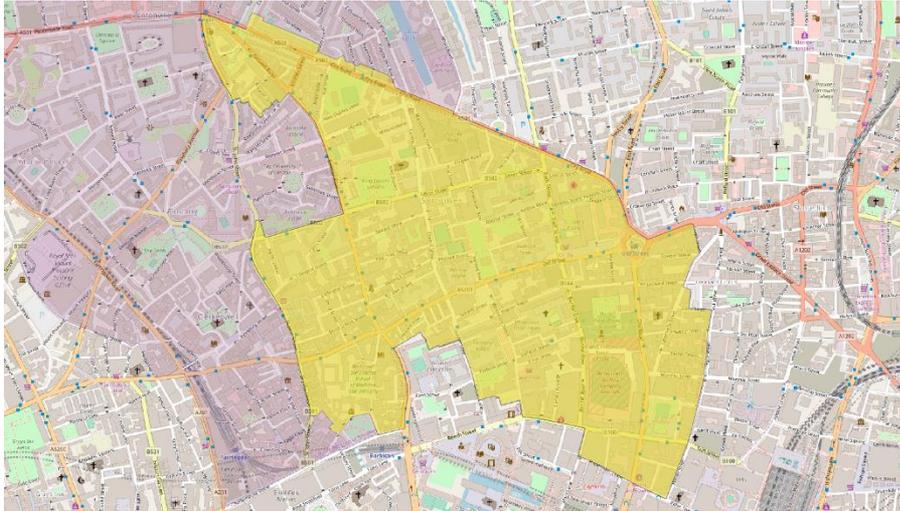
20. Clerkenwell supports a diverse and vibrant evening and night time economy and the Licensing Authority is committed to working with potential applicants and existing licence holders to ensure that licenced premises are well managed and any negative impacts on local residents in terms of crime, disorder, nuisance and antisocial behaviour are minimised.
21. Businesses in Clerkenwell make a significant contribution to the economic prosperity of the borough through the provision of employment opportunities, the well-established creative industries hub and the distinct cultural, leisure and historical offer in the area which attracts local, national and international visitors alike.
22. The business sector has been expanding in Clerkenwell as Farringdon Station transforms into one of the most significant transport hubs in London bringing new business and leisure opportunities. The Licensing Authority wants to support applications from businesses that contribute to the wider cultural offer in the area and those that enhance the diversity of the evening economy.
23. The Licensing Authority recognises that it has to balance the needs of businesses with those of local residents and it will utilise its Licensing Policy to address local issues
24. The review of our Licensing Policy in 2022 confirms that the cumulative impact policy for Clerkenwell had achieved its objective and that this policy should continue for a further 5 years however within the scope of this policy the Licensing Authority is able to give more detailed guidance on the sort of applications that could be considered to be an exception to the cumulative policy for Clerkenwell.

Possible exceptions to the Clerkenwell Cumulative Impact Policy

25. Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
 - a. The provision of mixed use or flexible premises that
 - i. Support the people visiting the area during the day
 - ii. encourage people to stay in the area after work
 - iii. encourage people staying in local hotels to socialise in the area
 - iv. support the wider cultural offer in the area
 - b. Premises that are not alcohol led
 - c. Premises with hours of operation consistent with framework hours
 - d. Premises supplying alcohol for consumption on the premises with robust arrangements to prevent vertical drinking, for example fully seated venues
 - e. Premises that can demonstrate high standards of management with respect to preventing public nuisance associated with waste management & littering
 - f. Commitment from the premises licence holder to:
 - i. actively support Pubwatch through regular attendance and engagement at meetings
 - ii. implement the Operation Nightsafe Best Practice Standards

BUNHILL CUMULATIVE IMPACT AREA

26. The map below shows the Bunhill Cumulative Impact Area:



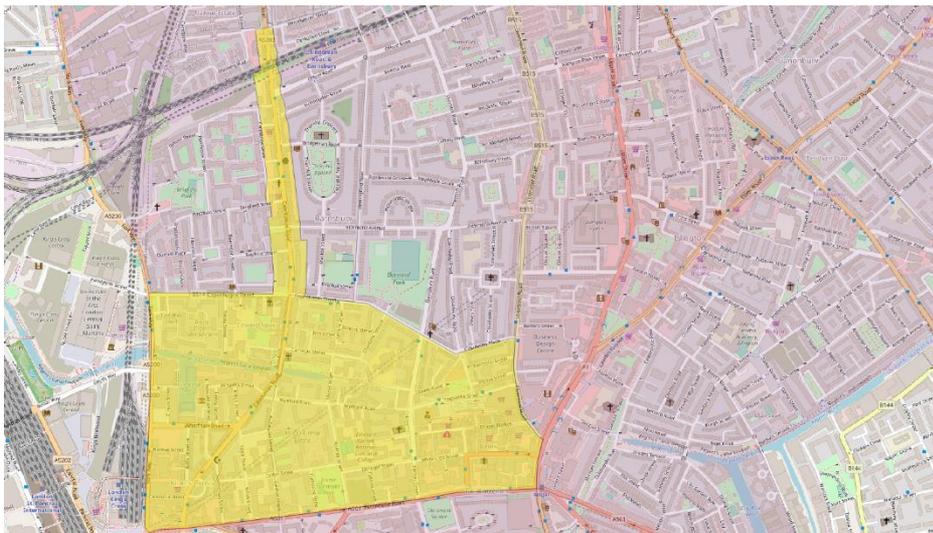
27. Tech City, a technology start up cluster at Old Street roundabout, and new major residential developments in the area and in neighbouring Hackney, has attracted more licenced venues to Bunhill to meet demand. This trend is likely to continue as more residential developments are built and the predicted long term impact of the redevelopment of Farringdon Station moves towards east London.
28. The Licensing Authority is committed to working with potential applicants and existing licence holders to establish a well-managed evening economy that meets residents and business needs whilst minimising any adverse impacts in terms of crime, disorder, nuisance and antisocial behaviour.
29. The Licensing Authority recognises that it has to balance the needs of businesses with those of local residents and it will utilise its Licensing Policy to address these local issues:
- Adverse impacts associated with late night venues
 - Alcohol related antisocial behaviour
 - Minimise the opportunities for drinking in the street and preloading
30. The review of our Licensing Policy in 2022 confirms that the cumulative impact policy for Bunhill had achieved its objective and that this policy should continue for a further 5 years however within the scope of this policy the Licensing Authority is able to give more detailed guidance on the sort of applications that could be considered to be an exception to the cumulative policy for Bunhill.

Possible exceptions to the Bunhill Cumulative Impact Policy

31. Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
- The provision of mixed use or flexible premises that
 - support the people visiting the area during the day
 - encourage people to stay in the area after work
 - support the wider cultural offer in the area
 - Premises with hours of operation consistent with framework hours
 - Premises that can demonstrate high standards of management with respect to preventing public nuisance associated with waste management & littering
 - Commitment from the premises licence holder to
 - actively support Pubwatch through regular attendance and engagement at meetings
 - implement the Operation Nightsafe Best Practice Standards

KINGS CROSS CUMULATIVE IMPACT AREA

32. The map below shows the current Kings Cross Cumulative Impact Area:



33. King's Cross has undergone some radical changes in recent years as a result of redevelopment creating King's Cross Central across the border in Camden and Regent's Quarter in Islington.
34. These changes, as well as the proposed developments in the area, have already led to an increase in the numbers of licence applications and an associated increase in representations from residents and ward councillors citing problems with cumulative impact issues such as noise disturbance, drunken fights and crime due to intoxicated persons in the area.
35. Due to its proximity to Kings Cross station the area is regularly used by visitors to sporting and other large-scale events in London and whilst it is recognised that the overwhelming

majority of visitors are well behaved, a small minority are associated with public nuisance and crime and disorder and antisocial behaviour.

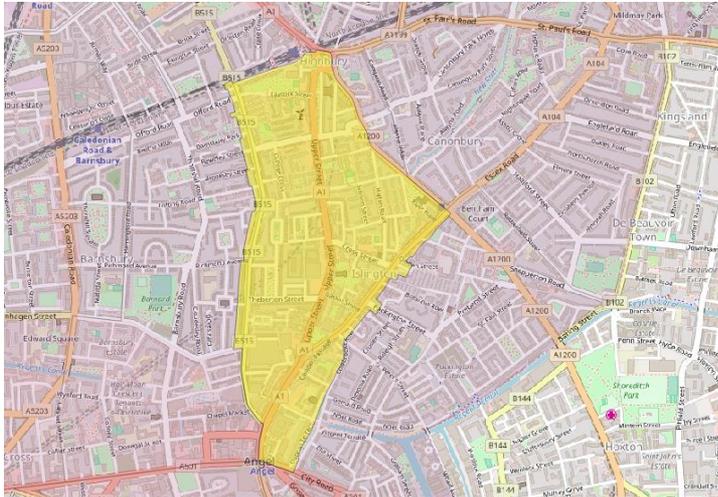
36. The Licensing Authority is committed to working with potential applicants and existing licence holders to maintain a well-managed evening economy that meets residents and business needs whilst minimising any adverse impacts in terms of crime, disorder, nuisance and antisocial behaviour.
37. The Licensing Authority recognises that it has to balance the needs of businesses with those of local residents and it will utilise its Licensing Policy to address these local issues:
 - Adverse impacts associated with late night venues
 - Alcohol related antisocial behaviour
 - Negative impacts associated with visitors attending large scale sporting and other events
38. The review of our Licensing Policy in 2022 confirms that the cumulative impact policy for Kings Cross had achieved its objective and that this policy should continue for a further 5 years.
39. Within the scope of the extended Kings Cross cumulative impact area, the Licensing Authority is able to give more detailed guidance on the sort of applications that could be considered to be an exception to the cumulative impact policy.

Possible exceptions to the extended Kings Cross Cumulative Impact Policy

40. Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
 - Premises that are not alcohol led
 - Premises with hours of operation consistent with framework hours
 - Premises supplying alcohol for consumption on the premises with robust arrangements to prevent vertical drinking, for example fully seated venues

ANGEL AND UPPER STREET CUMULATIVE IMPACT AREA

41. The map below shows the Angel and Upper Street Cumulative Impact Area:



42. Angel and Upper Street supports a diverse and vibrant evening and night time economy and the Licensing Authority is committed to working with potential applicants and existing licence holders to ensure that licenced premises are well managed and any negative impacts on local residents in terms of crime, disorder, nuisance and antisocial behaviour are minimised.
43. Licenced premises in Angel and Upper Street make a significant contribution to the to the reputation and economic prosperity of Islington. The area is renowned for being a vibrant place to live, work and socialise with a diverse evening economy characterised by a wide range of restaurants and cafes, pub and bars, live music venues, theatres, 2 cinemas and many interesting niche or independent shops.
44. Whilst many of the licenced venues operating in the area demonstrate high levels of commitment to providing safe and welcoming evening and night time environment the area continues to feature as alcohol related crime hotspot.
45. The Licensing Authority recognises that it has to balance the needs of businesses with public service and residents, and it will utilise its Licensing Policy to address these local issues:
- a) the impact of all venues on local residents
 - b) alcohol related crime and violence
 - c) providing safe and secure venues, especially for women and young adults
46. The review of Licensing Policy in 2022 confirms that the cumulative impact policy for Angel and Upper Street had achieved its objective and that this policy should continue for a further 5 years

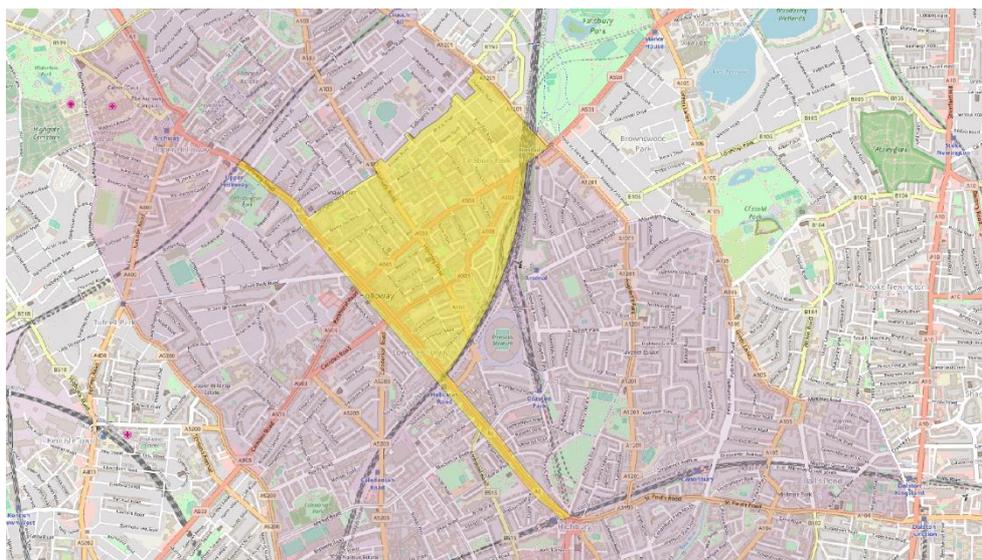
47. Within the scope of the Angel and Upper Street Cumulative Impact area, the Licensing Authority is able to give more detailed guidance on the sort of applications that could be considered to be an exception to the cumulative impact policy.

Possible exceptions to the Angel and Upper Street Cumulative Impact Policy

48. Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
- a. small premises with a capacity of no more than fifty persons with hours of operation consistent with the framework hours
 - b. premises which are mixed use or not alcohol-led with hours of operation consistent with the framework hours

HOLLOWAY AND FINSBURY PARK CUMULATIVE IMPACT AREA

49. The map on the next page shows the Holloway Road and Finsbury Park Cumulative Impact Area:



50. This commercially busy area of Islington includes Holloway Road, Nags Head Town Centre and Finsbury Park.
51. Regeneration in Finsbury Park is attracting new businesses and the Licensing Authority is committed to supporting the development of a new grass roots live music hub in the area.
52. Whilst many licenced premises in the wider Holloway and Finsbury Park area are well managed, a combination of the economic viability of some businesses and the high turnover of proprietors continues to impact on management standards and licenced businesses operating in the area have made a disproportionate demand on the Licensing Authority's enforcement resources.

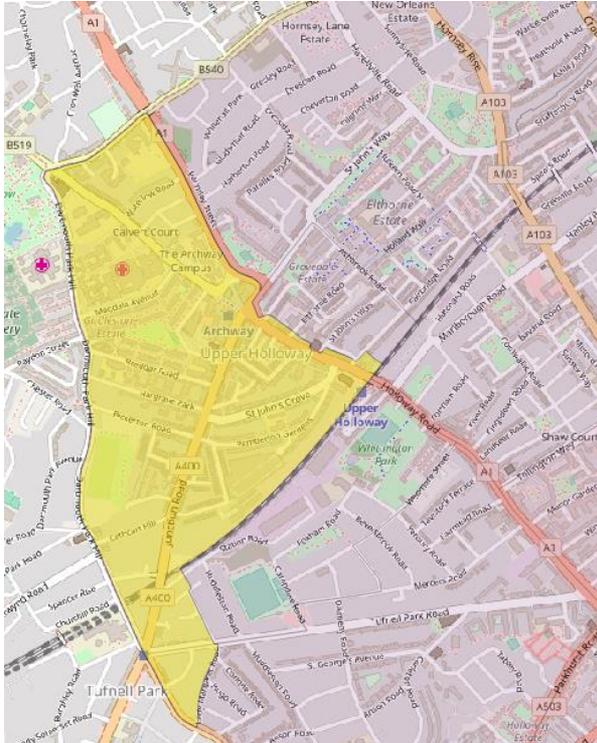
53. Licensing Authority is committed by working with potential applicants and existing licence holders to maintain a well-managed evening economy that meets residents and business needs whilst minimising any adverse impacts in terms of crime, disorder, nuisance and antisocial behaviour.
54. The Licensing Authority recognises that it has to balance the needs of businesses with those of local residents and it will utilise its Licensing Policy to address these local issues:
- a) Adverse impacts associated with the late night venues
 - b) Alcohol related antisocial behaviour, especially as a result drinking in the street
 - c) Negative impacts associated with visitors to large scale sporting and other events
55. The review of our Licensing Policy in 2022 confirms that the cumulative impact policy for Holloway and Finsbury Park had achieved its objective and that this policy should continue for a further 5 years.
Within the scope of the Holloway and Finsbury Park cumulative impact area, the Licensing Authority is able to give more detailed guidance on the sort of applications that could be considered to be an exception to the cumulative impact policy.

Possible exceptions to the Holloway and Finsbury Park Cumulative Impact Policy

56. Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
- a) Premises that are not alcohol led
 - b) Premises with hours of operation consistent with framework hours
 - c) Premises providing live music and other cultural activities
 - d) Premises implementing match and event day controls in Licensing Policy 15 where recommended by the Police or Licensing Authority

ARCHWAY CUMULATIVE IMPACT AREA

57. The map below shows the Archway Cumulative Impact Area:



58. One of the main issues of concern in the Archway Cumulative Impact area is the number of off licences operating in the area and the impact that widely available alcohol is having on local residents in terms of nuisance and antisocial behaviour, and public services dealing with alcohol related ambulance call outs and crime and disorder.
59. The area has a high concentrations of off licences and the area is home to Whittington Hospital, mental health facilities as well as a busy transport hub. These pressures contribute to cumulative impacts and the Licensing Authority response has been to maintain the cumulative impact policy for the area and to introduce bespoke framework hours for off licences in Archway.
60. To address the imbalance, the Licensing Authority wants to encourage applications that bring cultural opportunities for residents, and it is committed to working with potential applicants and existing licence holders to establish a diverse well-managed evening economy that meets residents and business needs whilst minimising any adverse impacts in terms of crime, disorder, nuisance and antisocial behaviour.
61. A secondary issue of concern is late night venues, including late night takeaways and the Licensing Authority will continue to apply its cumulative impact policies in relation to these types of application where representations are submitted by responsible authorities or residents.

62. The Licensing Authority recognises that it has to balance the needs of businesses with those of local residents and it will utilise its Licensing Policy to address these local issues:
- Adverse impacts associated with premises supplying alcohol for consumption off the premises
 - Alcohol related antisocial behaviour associated with drinking alcohol in the street
 - Lack of venues providing leisure and social activities
 - Negative impacts associated with late night venues
63. The review of our Licensing Policy in 2022 confirms that the cumulative impact policy for the Junction area of Archway had achieved its objective and that this policy should continue for a further 5 years however within the scope of this policy the Licensing Authority is able to give more detailed guidance on the sort of applications that could be considered to be an exception to the cumulative policy for Archway

Possible exceptions to the Archway Cumulative Impact Policy

64. Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
- a) Premises that do not supply alcohol for consumption off the premises
 - b) Premises providing cultural activities
 - c) Premises supplying alcohol for consumption on the premises with robust arrangements to prevent vertical drinking, for example fully seated community pubs
 - d) Premises supplying alcohol operating to the following framework hours: Monday to Sunday 9 am to 11 pm

OFF SALES OF ALCOHOL FROM SHOPS AND OTHER PREMISES

Licensing Policy 4

The Licensing Authority has adopted a special policy relating to cumulative impact in relation to shops and other premises selling alcohol for consumption off the premises.

This special policy creates a rebuttable presumption that applications for the grant or variation of premises licences or club premises certificates which are likely to add to the existing cumulative impact, will normally be refused or subject to certain limitation, following the receipt of representations, unless the applicant can demonstrate in the operation schedule that there will be no negative cumulative impact on one or more of the licensing objectives.

65. The Licensing Authority's cumulative impact and framework hours' policies have been successful in reducing negative impacts associated with late night supplies of alcohol. However, more needs to be done to deal with cumulative impacts arising from the supply of alcohol for consumption off the premises.
66. The number of off licences operating in the borough in most areas has reached the cumulative impact threshold and in areas where there is a successful evening and night

time economy off sales of alcohol is contributing to cumulative impacts as result of preloading.

67. Feedback from partners working in Public Health, Community Safety, the Emergency Services and Adult Social Care indicate that more had to be done to control the ease of access to alcohol in street drinking hotspots and areas visited by vulnerable people during the day and that night time economy off sales of alcohol were contributing to cumulative impacts as a result of preloading.
68. As a result, the Licensing Authority has adopted a special cumulative impact policy with respect to off sales of alcohol.
69. This special policy is not absolute. Each application will be considered on its merits and the Licensing Authority shall grant applications that are unlikely to add to the cumulative impact on the licensing objectives.
70. After receiving representations in relation to a new or variation application the licensing authority will consider whether it would be justified in departing from this special policy in the light of the individual circumstances of the case.
71. The impact of an application can be expected to be different for premises operating in different areas. If the licensing authority decides that an application should be refused, it will still need to show that the grant of the application would undermine one or more of the licensing objectives and that conditions or restrictions would be an ineffective solution.

Possible exceptions to the cumulative impact policy for off sales of alcohol

72. Applications with robust operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
 - a) Specialist premises selling alcohol ancillary to main activity of business e.g., florist providing champagne with flowers, cheese shop selling wine to accompany cheese
 - b) Premises that can demonstrate that the risk of alcohol purchased from the premises being consumed on the street is minimal due to the nature and type of alcohol being sold
 - c) Premises that are not in the vicinity of schools, drug and alcohol rehabilitation, wet or dry centres, mental health establishments nor street population hotspots
 - d) Premises outside the area based cumulative impact areas
73. Applicants and licence holders are expected to demonstrate high standards of management through their operating schedules including details of:
 - Competency arrangements for staff and managers
 - Documented induction and refresher training (refresh every 12 months)
 - Challenge 25 or similar schemes
 - Refusal procedures
 - Procedures in place to prevent the sale of illicit alcohol
 - Policies restricting the sale of high strength alcohol, single cans and miniatures

- No stocking of drug paraphernalia
- Limiting the off sale of alcohol by delivery by linking to food or a minimum spend
- Arrangements for communicating with staff and customers

LICENSING HOURS

Licensing Policy 5

Where representations are received from responsible authorities or other persons the Licensing Authority may seek to restrict hours of opening where it is appropriate to promote the licensing objectives.

The Licensing Authority may impose further limitations on hours upon review of the licence, particularly where the premises are shown to be the focus or cause of nuisance or anti-social behaviour.

74. The Licensing Authority supports the principle of flexibility in its approach to licensing hours and will consider the merits of each individual application however it is mindful that Islington has become saturated with late night premises selling alcohol and it is concerned about the cumulative impact that the proliferation of late night venues and retailers in the borough is having on the promotion of the licensing objectives.
75. The Licensing Authority is mindful of the argument that in some situations, longer licensing hours for the sale of alcohol can help to minimise the impact of large concentrations of customers leaving premises simultaneously. In Islington, many licenced premises are already open into the early hours of the morning, and this has contributed to the development of a thriving evening and night-time economy.
76. Balanced against this is the evidence in Islington that extended opening hours has seen increased levels of crime and anti-social behaviour such as noise and disturbance to local residents living near licenced premises, fast food outlets, bus stops, train and underground stations that continues through the early hours of the morning.
77. Later opening hours can also impact on the response times for the Police, Fire and Ambulance Service as peak demand for their services extends across the night and early hours of the morning, correlating with the increase in late opening. The number of late night premises is now at a level where to allow more would adversely impact on this balance.

Licensing policy 6

When dealing with new and variation applications the Licensing Authority will give more favourable consideration to applications with the opening and closing times listed in the table below:

Public Houses and Bars	Sunday to Thursday	8am to 11pm
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	Friday and Saturday	8am to midnight
Nightclubs	Sunday to Thursday	8am to 1am the following day
	Friday and Saturday	8am to 2am the following day
Restaurants Cafes & Coffee Shops	Sunday to Thursday	8am to 11pm
	Friday and Saturday	8am to midnight
Hot food and drink supplied by takeaways & fast food premises	Sunday to Thursdays	11pm to midnight
	Friday and Saturday	11pm to 1am the following morning
Off Licences	Monday to Sundays	8am to 11pm
Hotels - residents only	Monday to Sundays	24 hours sale of alcohol
Hotels- guests and non-residents	Sunday to Thursdays	8am to 11pm
	Friday and Saturday	8am to midnight
Premises selling alcohol for consumption off the premises in close proximity to or in high risk areas	Monday to Sunday	10am to 11pm

78. High-risk areas are defined as areas of the borough where partners involved in alcohol harm reduction work have identified there are particular concerns around the vulnerability of those visiting or residing in the area. For example, an area where one or more of the following apply:

- there are considerable levels of street drinking or partners are reporting having to attend a number of alcohol related incidents
- in close proximity to local hospitals, drug and alcohol services or mental health services
- in close proximity to vulnerable young people's services (such as children and young people's drug and alcohol services, CAMHS, young persons supported accommodation, pupil referral units)

- there is particularly vulnerable adult supported accommodation (accommodation for individuals who continue to drink or where there are more than 10 residents).
79. The above hours are intended to guide applicants on the Licensing Authority's expectations when preparing their Operating Schedules. The above hours are not pre-determined and each application will be considered on its merit. In some situations, local issues may indicate that shorter licensing hours are appropriate to promote the licensing objectives.
80. Applicants for premises licences falling outside the above hours are expected to fully explain in their operating schedule the arrangements that they will put in place, to ensure that the premises will not add to the impact late night premises may have on the local community. Operating schedules with insufficient detail are more likely to be refused, attract limitations in hours, or have conditions imposed on them by the Licensing Authority.
81. For applications within the above hours, there is no presumption that the application will automatically be granted in all cases where relevant representations are made.
82. Furthermore, the Licensing Authority considers that the possibility of disturbance to residents is more likely to occur at night and in the early hours of the morning and despite the best efforts of businesses to manage the dispersal of patrons it can be very difficult to eliminate any such disturbance to residents when patrons have left the vicinity of a licenced premises.
83. Applicants and licence holders who wish to provide licensable activities outside the hours specified above should ensure that the operating schedule specifies detailed measures to mitigate against crime, disorder and public nuisance taking into account:
- the location of the premises and the character of the area in which they are situated
 - the proposed hours during which licensable activities will take place
 - the adequacy of the applicant's proposals to prevent crime and disorder and prevent public nuisance
 - whether customers have access to public transport when arriving at or leaving the premises
 - the proximity of the premises to other licensed premises in the vicinity and the hours of operation of those other premises policies and proposals for the orderly dispersal of customers.

THE OPERATING SCHEDULE

Licensing Policy 7

The Licensing Authority seeks to encourage the highest standards of management in licensed premises and expects this to be demonstrated through the operating schedule.

In particular, it expects applicants to:

- **explain how they will promote the licensing objectives**
- **address the relevant guidance in this policy.**

84. The operating schedule must include all information necessary to enable the Licensing Authority, responsible authorities or other persons to assess whether the steps outlined for the promotion of the licensing objectives are satisfactory. This will mean that applicants will need to complete their own detailed risk assessments on their businesses prior to completing their operating schedule.
85. Where the operating schedule does not provide enough details, there is an increased likelihood that representations will be made and that the Licensing Committee hearing the application will have insufficient information to satisfy itself that the application will promote the licensing objectives.
86. Applicants are reminded that the late submission of additional written evidence to support an operating schedule should be submitted at least 2 clear working days prior to the Licensing Committee hearing to allow the Licensing Committee and any responsible authority or residents making representations to consider the new information before the start of the hearing.
87. Any proposed changes to the operating schedule must be notified to the Licensing Authority and depending on the nature of the changes proposed, the Licensing Authority may require a new premises licence application or the submission of an application to vary the existing licence.

MANAGEMENT STANDARDS

Licensing Policy 8

When assessing the applicant or licensee's ability to demonstrate a commitment to high standards of management the Licensing Authority will take into account whether the applicant or licensee:

- **can demonstrate comprehensive knowledge of best practice**
- **has sought advice from the responsible authorities**
- **has implemented any advice given by the responsible authorities**
- **is able to understand verbal and written advice and legal requirements**
- **can demonstrate knowledge of the licensing objectives, relevant parts of the Licensing Policy and their responsibilities under the Licensing Act 2003**
- **is able to run their businesses lawfully and in accordance with good business practices**
- **can demonstrate a track record of compliance with legal requirements**
- **can explain how they will brief staff on crime scene preservation**

Where there is a history of non-compliance associated with the management of the premises the Licensing Authority is unlikely to grant a new or variation application or permit premises to continue to operate without further restrictions on review, unless there is evidence of significant improvement in management standards.

88. The Licensing Authority is committed to promoting high standards of management in all licenced premises and expects applicants and licensees to demonstrate this through their operating schedule and management practices. Experience indicates that where these requirements are not adhered to the licensing objectives are likely to be undermined.

EQUALITY AND INCLUSION IN LICENSED PREMISES

Licensing Policy 9

Applicants are encouraged to provide evidence as to how they will promote equality and inclusion. Where relevant and appropriate, the licensing authority will take such evidence into account and give it due weight in the licensing process.

89. Islington has a diverse resident and visitor population and that is reflected in the wide range of successful licensed business in the area, offering multi-cultural food and entertainment and accessible venues. In our role as the licensing authority, we aim to encourage applicants to promote diversity, accessibility and including to provision of accessible facilities such as community toilets, whilst fulfilling their legal obligations under the Equality legislation.
90. In certain cases, the requirement to promote equality and diversity will directly engage the licensing objectives. In others, an applicant's evidenced commitment to promoting equality and diversity may signify a high standard of corporate social responsibility. This may help to demonstrate that they can also be trusted to promote the licensing objectives. As such, applicants are encouraged to provide evidence as to how they will promote equality and diversity. Where relevant and appropriate, the licensing authority will take such evidence into account and give due weight in the licensing process.

DIVERSITY IN THE EVENING AND NIGHT TIME ECONOMY

Licensing Policy 10

The Licensing Authority seeks to promote applications for venues that are not alcohol led. Mixed-use venues, with alcohol sales being offered to customers alongside entertainment or food, and applications for premises that will provide an all seated environment for customers are encouraged. Applications for premises licences to provide vertical drinking are not encouraged but if made, the operating schedule will be expected to demonstrate robust arrangements for promoting the licensing objectives.

91. Islington already has a large number of licensed premises operating in a densely populated area. Our experience has shown that the design and offer within premises has a strong influence on levels of drinking and behaviour.

92. The Licensing Authority wants to encourage and support diversity in the evening and night time economy and welcomes applications for mixed-use premises or premises where alcohol is not the dominant feature so as to broaden the appeal to a wider range of people.

CULTURAL VENUES

Licensing Policy 11

The Licensing Authority wishes to encourage more cultural spaces to be opened in the borough so that the cultural offer is widely available and accessible to residents and visitors.

93. The Licensing Authority aims to balance its support for community entertainment to encourage and celebrate cultural diversity with the need to provide safe venues and events that do not have an adverse impact in terms of crime, disorder, and public nuisance. It also wants to encourage small-scale live music, grassroots live music, dancing and theatre in licensed premises for the wider cultural benefit of communities generally.
94. The borough boasts key creative hubs in the performing arts and in the performing arts training sector, most notably dance and theatre which alongside a vibrant music, literature and visual arts offer support a bustling evening economy. Islington is proud of its live music scene and the Licensing Authority wants to build on recent successes to support grass roots music venues setting up in the borough.
95. The Licensing Authority supports and encourages communities to celebrate culture at grass roots level and promotes community use of the council's own venues, open spaces and parks. To support and encourage community use, 15 of our parks and open spaces are licensed for entertainment.
96. Where issues arise with activities in existing premises because of new developments or change in existing arrangements in the locality, the Licensing Authority will encourage informal and formal dialogue avenues between interested parties before any review measures are instigated. The Licensing Authority will take due regard of adherence to this approach when considering any review applications for premises providing this type of activity.

WORKING TOGETHER AND SUPPORTING BEST PRACTICE

Licensing policy 12

The Licensing Authority believes that applicants and premises licence holders operating, or aspiring to operate, well-managed premises will want to work with responsible authorities to develop, support and share best practice. There are a number of schemes that the Licensing Authority promotes to support this objective:

- **Participation in local Pubwatch**
- **Operation Nightsafe – Best Practice for Managing Late Night Venues and**

Premises

• Islington's Licensees Charter

PUBWATCH

97. The borough-wide pubwatch network encourages licensees to work together to promote the licensing objectives in their premises by providing a forum for sharing information, disseminating best practice and meeting with representatives of the licensing authority, the police and other responsible authorities.
98. The Licensing Authority encourages all licensees to actively participate in their local pubwatch scheme and it will support the development of more schemes where there is a demand.

OPERATION NIGHTSAFE BEST PRACTICE

99. The Licensing Authority and the Police have developed an accreditation scheme for businesses operating in the night time economy to recognise high standards of management. All licensed businesses are eligible to apply and those who meet the standard and are eligible for the late night levy, will also receive a reduction of 30% to their fee.

ISLINGTON'S LICENSEE'S CHARTER

100. The Licensee's Charter is designed to create venues that are safe and secure for customers whilst respecting the rights of residents living nearby. The Licensing Authority is keen to for all licence premises to support the charter and commit to:
- a. Providing safe, secure inclusive venues and premises
 - b. Respecting local neighbours and encouraging customers to do likewise
 - c. Providing high standards of management both inside and outside the premises
 - d. Investing in staff training to support the Charter' objectives
 - e. Supporting initiatives that that contribute to net zero carbon

TRAINING AND BRIEFING SESSIONS

101. From time to time the Licensing Authority and the Police arranges training and briefing sessions to assist premises licence holders with their responsibilities to operate safe and compliant businesses. Recent examples include Selling Age Restricted Products, Counter Terrorism Awareness, Managing a Live Music Venue, Welfare and Vulnerability Engagement (WAVE). Licence holders are encouraged to attend these events so that best practice can be widely disseminated.

TEMPORARY EVENT NOTICES

Licensing Policy 13

When considering objections to temporary event notices the Licensing Authority will consider the:

- **circumstances of the objection**
- **the applicant's willingness to comply with the conditions attached to the premises licence**
- **history of complaints**
- **the track record of the applicant**
- **any other proposed control measures to mitigate the objection**
- **the notice has been submitted within an appropriate time for the responsible authorities to assess the event**

102. Most temporary event notice applications are accepted by the Licensing Authority as requested. Where an objection notice is received from the responsible authorities (Police or Environmental Health), the Licensing Authority will hold a hearing to consider the objection (unless all parties agree that this is unnecessary). If the Licensing Authority decides that the event would undermine the licensing objectives and should not take place, a counter notice will be served.

103. The Licensing Authority expects anyone submitting a temporary event notice to consider the concerns of the responsible authorities and to implement appropriate measures to mitigate against the risk of the event undermining the licensing objectives.

104. Whilst the Licensing Act 2003 prescribes minimum timescales for temporary event notices, events requiring an event management plan, noise management plan or those that fall within that of an event that needs to be presented to a Safety Advisory Group meeting will require a longer lead in time.

RISK ASSESSMENTS

Licensing Policy 14

The Licensing Authority expects all applicants, premises licence holders and people submitting temporary event notices to undertake a comprehensive risk assessment to ensure that the four licensing objectives are considered and appropriate control measures put in place to promote the licensing objectives.

Risk assessments, including Fire Risk Assessments should be completed prior to licensable activities taking place on a premises and updated for non-routine events such as externally promoted events. These include events such as:

- **externally promoted events that could be deemed high risk**
- **events with alcohol that could attract a younger audience**
- **mixed age group activities**
- **events that run beyond the framework hours**
- **events with special effects or activities that require specialist risk assessments**
- **where there is an existing condition on the premises licence.**

105. Further advice on event safety and risk assessment can be found on the following websites:

<https://www.islington.gov.uk/libraries-arts-and-heritage/arts/events-funding-and-space/organising-an-event/guides-insurance-and-risk-assessment> and
<http://www.hse.gov.uk/event-safety/running.htm>

106. For externally promoted events, licensees are encouraged to conduct risk assessments for each externally promoted event. Premises licence holders are encouraged to link in with Safer Sounds through the “Safer Business Network” which can be found at <https://www.saferounds.org.uk>

ALCOHOL INDUCED CRIME, DISORDER AND ANTISOCIAL BEHAVIOUR

Licensing Policy 15

The Licensing Authority expects licensees to operate to the highest standards of management, and to cooperate with responsible authorities, to prevent:

- **alcohol induced crime, disorder and antisocial behaviour inside, outside and in the near vicinity of premises**
- **the sale of alcohol to underage children**
- **selling alcohol to customers who are drunk**
- **drunkenness on premises**
- **irresponsible drinks promotions**
- **street drinking in the local vicinity**

Specific measures, depending on the nature of the venue, may include:

- **A designated outside drinking area**
- **A specified time for outdoor areas to be clear**
- **Measures in place to monitor and supervise customers in outside drinking areas**
- **The use of CCTV**
- **Door supervisors**
- **Operational policies underpinned by staff training and management support**
- **Refrain from selling high strength alcohol**
- **Preventing pavement obstructions**
- **ID scanning**
- **Search procedures and systems in place for confiscated alcohol or weapons**

Where the Licensing Authority receives representations from responsible authorities that the management of a premise is supporting such activities, or that there is strong evidence linking patrons with alcohol related crime, disorder or antisocial behaviour the Licensing Authority will consider reviewing the licence to impose appropriate sanctions to prevent or minimise the impact.

107. Applicants and licence holders are expected to work with the Licensing Authority and Police to minimise the risk of alcohol induced crime, disorder and antisocial behaviour.

Where localised problems exist, licence holders are expected to implement additional robust measures to minimise adverse impacts on residents and public services.

108. Where appropriate the Licensing Authority will consider imposing controls on products sold where representations indicate localised problems. This provision could include banning the sale of super strength beer, lager and cider in premises or banning specific promotions, as part of a package of measures to deal with problems associated with drinking in the street.

SELLING ALCOHOL ON EVENT AND MATCH DAYS

Licensing Policy 16

The Licensing Authority expects all applicants and premises licence or certificate holders to support the council in promoting public safety and minimising alcohol related crime and disorder on large-scale event and match days by including the following large-scale event and match day arrangements listed below in their operating schedules:

- **Refrain from selling alcohol until 11 am on Monday to Saturday and midday on Sunday, unless otherwise agreed with the police.**
- **Manage patrons drinking outside the premises in designated areas using registered door supervisors.**
- **Employ senior staff and registered door supervisors on high risk match and event days.**
- **For 4 hours before advertised start of the match or event and until 1 hour after the match or event finishes to only sell alcohol in plastic containers, except in indoor areas set aside for the consumption of food by table service i.e. in restaurants and areas set aside from a main bar in public houses for the primary consumption of food.**
- **To not support the consumption of alcohol in glass containers on the public highway including any dedicated authorised tables and chairs licence.**

109. The above restrictions apply to all shops, off licence, pubs, bars and restaurants that may attract football supporters at any designated match at Emirates Stadium or people attending large-scale events at the Emirates Stadium or elsewhere in the Borough and Finsbury Park. A large-scale event is defined as an event with an expected capacity in excess of 10,000. Licensees can check with Police and Licensing Officers on what is classified as high risk matches and events.

110. The Licensing Authority has specific concerns about the consumption of alcohol in public places on these occasions and the potential that this has on local residents and public services, in terms of alcohol induced disorder and anti-social behaviour, increased litter, and the necessity for Police or Local Authority intervention. Premises licence holders are also expected to not knowingly sell alcohol to persons where the licence holder suspects it will be consumed on the public highway or adjacent public spaces.

USE OF TOUGHENED GLASS AND POLYCARBONATES

Licensing Policy 17

The Licensing Authority expects applicants and licence holders to take a risk based approach to the use of toughened glassware and polycarbonate.

The Licensing Authority will consider imposing a condition prohibiting the sale of alcohol in glass containers (glasses and bottles) and require the use of polycarbonate or other safer alternatives where:

- **local needs dictate**
- **a relevant representation is received**
- **the premises are operating beyond midnight**
- **the licence permits drinking outside**

111. Evidence indicates that the majority of incidents with lacerations from glass occurring inside licensed premises are accidents. However, some are malicious and cause horrific injuries and lifetime scarring. In recent years there have been a number of high profile cases where people have suffered serious injuries resulting from glass attacks.

112. Outside premises, glass containers, as well as being potential weapons, add to street debris, pose risks to street cleaners and pedestrians and generally undermine the objective to minimise public nuisance.

113. The Licensing Authority believes that the use of safer alternatives to glass will help promote public safety and the prevention of crime and disorder in licensed venues.

114. The Licensing Authority will take into account the nature of the venue when considering imposing conditions restricting the use of glass, including the uses of bottled drinks. Considerations will include:

- the type of venue
- the customer base
- the hours of operation
- the standard of management demonstrated by the current licensee
- the history of alcohol related crime and disorder associated with the premises
- the extent to which drinking is permitted outside
- the licensee's risk assessment
- the views of the local police

ILLICIT GOODS

Licensing Policy 18

The Licensing Authority expects applicants and premises licence holders to have arrangements in place to prevent the sale of illicit, non-duty paid or stolen goods.

Where arrangements are not proposed or in place, the Licensing Authority will impose licence conditions or sanctions that are appropriate for promoting the licensing objectives.

115. The Licensing Authority expects applicants and premises licence holders to have

procedures in place to prevent the possession or sale of illicit alcohol and tobacco, including training of all staff and a system to ensure that all alcohol and tobacco can be traced (e.g., by invoices) directly to the supplier. This paperwork should be retained and made available to officers when requested.

116. The Licensing Authority expects licence holders to take advantage of any training offered by the Trading Standards service, which covers sale of illicit goods and under age sales amongst other subjects.

DRUG POLICIES

Licensing Policy 19

The Licensing Authority is committed to ensuring that, where appropriate, the design and management of licenced venues maximises the safety of customers, performers and staff. The Licensing Authority will normally expect the submission of a drug policy as part of the operating schedule for applications for new premises licences and for variations to existing licences for night clubs and similar premises.

Where there are issues of concern the Licensing Authority will expect to see evidence that the drug policy has been implemented and reviewed.

117. Within the context of promoting the licensing objectives for preventing crime and disorder and ensuring public safety the Licensing Authority expects applicants and licensees to:

- take all reasonable steps to prevent the entry of drugs into licensed premises
- take all reasonable steps to prevent drugs changing hands within the premises
- have search procedures in place and system for recording seizures and storage of drugs.
- train staff to recognise understand the signs of drug misuse in people so that practical steps can be taken to deal with any instances that occur
- have appropriately trained staff to deal with drug related incidents
- display appropriate drug safety awareness information for customers
- provide a first aid room and first aid equipment, including a defibrillator in larger venues
- deploy staff trained to assist with medical incidents
- implement an appropriate banning policy

SAFER TRAVEL AT NIGHT

Licensing Policy 20

In determining late night applications, the Licensing Authority will consider the arrangements for securing safe access to public transport facilities for customers and staff leaving the premises.

The Licensing Authority expects late night venues to include safer travel arrangements for departing customers and staff in their operating schedule.

Appropriate arrangements may include:

- **ease of access to late night public transport in the local area**
- **making facilities available for customers and staff to contact a local taxi firm**
- **facilities to allow patrons to wait for taxis and mini cabs in a safe environment where they will not cause disturbance to local residents**
- **taxi queue management**
- **provision of clear, accessible, comprehensive and up-to-date information to customers and staff**
- **proposals deterring illegal mini cabs touting for business outside the venue**
- **appropriate staff training programme, including advice on safe travel to and from work.**

118. Applicants for new licences and those wishing to increase their operational hours, or the capacity of their premises will need to demonstrate that due consideration has been given to arrangements for the quick, safe and quiet dispersal of customers from their venues. This may include additional measures for premises located in or near Low Traffic Neighbourhoods. The emphasis should be on promoting public transport, taxis and licenced mini cabs as car parking facilities are limited and experience indicates that customers parking cars in residential areas often create noise and interrupts the sleep of local residents

119. The Licensing Authority is concerned about the impact of mini cabs waiting outside licensed premise on nearby residents and the nuisance and safety issues arising from unlicensed mini cabs touting for business outside venues. It expects licensees to proactively manage the demand for taxis and mini cabs and to minimise their impact on residents. It also expects applicants and licence holder to implement measures to support enforcement agencies dealing with illegal mini cabs.

120. For staff working beyond midnight the Licensing Authority expects applicants to adopt a safe transport home policy, which might include free transport for staff to return safely home or individual risk assessments to identify the availability of transport options and potential hazards.

SAFE AND SECURE LICENSED VENUES

Licensing Policy 21

In determining applications for pubs, clubs and bars the Licensing Authority will expect the applicant to explain its approach to creating a safe and secure environment for everyone, including adoption of schemes supporting safeguarding of women, LGBTQ+ and vulnerable customers and the protection of young adults in licensed venues.

121. Whilst aiming to create a safe and secure environment for everyone working and socialising in in pubs, clubs and bars, the Licensing Authority encourages applicants and premises licence holders to consider arrangements that could be put in place to manage the risk of harassment of women, such as “Ask for Angela” scheme and WAVE training (Welfare and Vulnerable Engagement) and to protect LGBTQ+ customers and young

adults.

122. Applicants and licence holders for these types of venues should include these safeguarding measures in their operating policies and are encouraged to consider adopting the following measures to help prevent and reduce violent crime linked to the night time economy, to prevent and reduce sexual offences, reduce preventable injury linked to alcohol and drug use in the licensed economy and reduce opportunities for criminal activity and anti-social behaviour in licensed premises by:
- Promoting 'Ask Angela'
 - Promoting 'Ask Clive'
 - Signing up to the Women's Night Safety Charter
 - Signing up to 'Good Night Out'
 - Signing up to be a "Safe Haven"
 - Displaying posters which discourage harassment and hate crime and encourage reporting to staff/managers
 - Taking every report seriously with appropriate action
 - Taking steps to support people who report sexual harassment, assault and drink spiking
 - Training and supporting staff to implement venue policies
 - ensure vulnerable customers leave the venue safely
 - Use ID scanners at venues
 - Conduct risk assessments for each externally promoted event. Consideration to be given to linking in with Safer Sounds through the 'Safer Business Network'. <https://www.saferounds.org.uk>
 - Adopt a Standard Operating Procedure (SOP) for every medical emergency that requires an ambulance to be called to the venue.
123. Where appropriate premises applicants should consider the risk of drink spiking and have policies and procedures in place to prevent spiking and provide welfare support for customers who report that they have been the victim of spiking. Measures will include:
- Acting upon all reports, and alleged reports, of spiking, recording details and reporting to the police.
 - Providing appropriate health, safety and welfare for customers
 - Training staff and security teams on procedures
 - Having procedures in place for searching, checking toilets and chillout and other quiet spaces
 - Good CCTV coverage throughout the premises

PUBLIC NUISANCE

Licensing Policy 22

The Licensing Authority is committed to preventing public nuisance by protecting the amenity of residents and businesses in the vicinity of licensed premises. Applicants and premises licence holders are expected to address these issues in their operating schedules.

Where relevant representations are received, the Licensing Authority will impose appropriate restrictions or controls on the licence to support the prevention of public nuisance due to:

- **amplified sound:** noise from music/films etc. played on the premises and or in external areas.
- **deliveries from the premises:** particularly early morning and late night and with a focus on delivery vehicle noise including idling engines and noise from delivery riders/drivers.
- **deliveries to the premises:** particularly early morning and late night, weekends and bank holidays deliveries, including idling vehicles
- **flyposting:** unauthorised posting of posters / advertisements etc.
- **highways and pavement obstructions:** obstruction by customers blocking footpaths when eating, drinking and smoking near to the premises or by furniture/signs etc.
- **light pollution:** unshielded lighting, lighting directed at neighbouring properties, excessive lighting
- **litter and waste:** litter and waste generated by the carrying out of licensable activities, for example, food wrappers and cigarette butts.
- **noise from patrons:** for instance:
 - patrons queuing to enter the premises.
 - patrons eating, drinking or smoking in external areas.
 - patrons dispersing from the premises late at night.
 - car horns/car radios/slamming of car doors late at night.
 - general drunken behaviour and shouting etc.
- **odour, smells and smoke:** smell nuisance from ventilation ducting and kitchen extractors. Also, smoke from wood and charcoal equipment etc.
- **plant and machinery noise:** including air conditioning units, refrigeration units and kitchen extractors etc.
- **street fouling and urinating in public:** urination and the fouling of pavements and doorways through vomiting etc.
- **waste and other collections:** particularly early morning and late night, weekends and

bank holidays, clearing up and collection of waste and particularly of glass.

- **recycling facilities:** storage of waste such as glass and bottles etc.

Public nuisance can apply to a wide range of activities that prevent residents, members of the public or other businesses carrying out their normal activities or that cause the council to have to take remedial action. The Licensing Authority expects applicants and premises licence holders to implement measures to minimise public nuisance associated with, but not exclusive to the above.

NOISE ASSOCIATED WITH LICENSABLE ACTIVITIES

Licensing Policy 23

The Licensing Authority is committed to protecting the amenity of residents and businesses in the vicinity of licensed premises, particularly when late hours have been sought. Where relevant representations are received, the Licensing Authority will impose appropriate restrictions and controls on the premises licence to prevent public nuisance and undue disturbance to local residents from licensed premises.

124. The London Borough of Islington receives a considerable number of complaints about antisocial behaviour and noise and the expansion of the night-time economy has increased noise within urban settings above the national average. It is in the context of these trends that noise disturbance from licensed premises will be considered by the Licensing Authority. The Licensing Authority will seek to balance the protection of residents from undue disturbance against noise and the activity that is the natural by-product of people going about their business, entertainment or leisure.
125. The Licensing Authority expects that premises intended for the provision of noise-generating licensable activities are acoustically controlled and engineered to a degree whereby the noise from the premises when compared to the ambient noise level will not cause undue disturbance. The Licensing Authority recognises specific difficulties associated with other premises structurally linked to would-be licensed premises and the limit of sound insulation performance that can be achieved. In some circumstances, licensed premises with amplified music above the volume level of acoustic musical instruments adjoining residential properties may not be appropriate. The Council has guidance on this matter that can be made available 'Technical advice for Consultants on sound insulation and noise control criteria for entertainment licensed premises'.
126. The council expect developers building new residential premises in close proximity to licensed premises to implement the 'agent of change' principle by incorporating a high standards of mitigation measures into the design and construction of residential properties to protect future residents from nuisance from licensed venues.
127. There are exemptions for live and recorded music from being licensable activities in certain circumstances. Licensees and applicants must recognise that these activities may still give rise to noise nuisance and be aware of remedies available to the Council should noise nuisance be established. Licensees should work in partnership with the relevant

officers to avoid the need for enforcement action to abate noise nuisance once informed of any issues.

128. Where the Licensing Authority receives representations or a review application in relation to deregulated entertainments it will seek to impose restrictions or conditions that are appropriate for preventing noise nuisance. Licensees should be aware that the Licensing Authority can apply to have a deregulation removed by means of review of the premises licence.
129. Potential noise or odour relating to extraction units should be considered as part of the operating schedule particularly if late night refreshment is part of the licensable activity applied for.
130. Potential noise relating to deliveries from the premises should be considered as part of the operating schedule particularly if late night refreshment is part of the licensable activity applied for.

NOISE FROM DELIVERIES TO THE PREMISES

Licensing Policy 24

Licence holders and applicants are encouraged to consider whether early morning deliveries to their premises could potentially result in a public nuisance and to introduce measures to minimise the impact where appropriate. The Licensing Authority recognises that refuse collection and delivery times can sometimes be outside the control of the premises licence holder but encourages the appointment of contractors who can carry out collections and deliveries during normal hours of work and outside the night time hours of 23:00 to 07:00. Collections of bottles and other waste glass should be avoided during the above hours.

131. Licence holders and applicants are encouraged to consider whether early morning or overnight deliveries to and collections from their premises could potentially disturb residents in the vicinity resulting in public nuisance. It is recommended that licensees and applicants consider this aspect of their business and introduce measures to minimise noise impact of their activities during night-time hours that according to the World Health Organisation should be a period of 8 hours between 23:00 – 07:00 local time.
132. Applicants should consider suitable provision for refuse storage, recycling facilities and other waste inside premises in order to facilitate daytime collections. Waste and materials for recycling should not be stored on the public highway.
133. Where representations are received from local residents in the vicinity of licensed premises stating they are being disturbed by early morning or night time collections and deliveries, the applicant or premises licence holder will be requested to renegotiate different times outside the night time period with their contractors and to liaise with local residents where appropriate to seek agreements on acceptable hours. In the event that informal agreements cannot be reached, the appropriate Responsible Authority may seek to impose delivery and collection times as conditions on premises licences by means of review of the premises licence where they do not already exist.

NOISE RELATING TO DELIVERIES FROM THE PREMISES

Licensing Policy 25

Licence holders and applicants are encouraged to consider whether quiet deliveries can be made to customers' premises when delivering licensable goods or conducting late night deliveries. Noise from delivery vehicles is a large source of complaints and could potentially result in a public nuisance.

Licence holders and applicants need to introduce measures to minimise the impact, particularly of vehicle noise. The Licensing Authority recognises that deliveries from the licensed premises can sometimes be outside the control of the premises licence holder but encourages the appointment of contractors who can carry out collections and deliveries using non-internal combustion engine vehicles.

134. Whilst each premises is different and unique, there are several sources of noise and nuisance noise complaints that are common to many premises with a delivery service. Any operating schedule for a premises with a delivery service should address potential nuisances such as:

- Noise from delivery vehicles
- Noise from drivers/riders awaiting pickup
- Noise from the delivery

135. All proposals for a delivery from the premises service are required show that 'quiet' vehicles (such as electric vehicles and bicycles, cargo bikes etc.) will be used unless there are exceptional reasons why this is not possible. Applicants will be asked to justify why they would be unable to use quiet vehicles and produce a plan for their introduction#

SMOKING, DRINKING AND EATING OUTSIDE

Licensing Policy 26

The Licensing Authority recognises that where gardens, tables and chairs outside are provided for smoking, drinking or eating, users can potentially cause a nuisance. However, the Council supports, where appropriate, the use of outside tables and chairs to ensure the resilience of licenced businesses in the Borough

Where smoking, eating and drinking takes place outside the Licensing Authority expects applicants to provide comprehensive details in their operating schedule on:

- **the location of outside areas to be available for use**
- **how the outside areas will be managed to prevent:**
 - **noise**
 - **smell**
 - **light pollution**
 - **pavement obstructions**
- **the arrangements for clearing, tables and chairs**
- **preventing nuisance from smoke fumes to residents living in close proximity to**

smoking areas

Where the Licensing Authority receives representations or a review application regarding the use of an outside area it will impose restrictions or conditions that are appropriate for preventing a public nuisance.

136. The provision of tables and chairs outside the premises, either on the highway or on private land, and the provision of beer gardens, can enhance the attractiveness of the venue. It can have the benefit of encouraging a continental style café culture and family friendly venues.
137. Late at night, tables and chairs and beer gardens can cause significant public nuisance to residents whose homes overlook these areas. In some premises these facilities can encourage patrons and passers-by to loiter rather than disperse and in many cases, noise control measures are not feasible.
138. The use of such areas, especially pavements, should take account of potential access issues for people with disabilities and the safe use of wheelchairs and other access equipment.
139. The placing of items such as tables, chairs and barriers on or adjacent to the highway needs to be licensed by the Council's Street Trading Team and applicants will usually be expected to hold that licence when their application is made or prior to using the external area.
140. Whilst each premises is different and unique, there are several sources of noise and nuisance complaints that are common to many premises with outside areas. Any operating schedule for a premises with an outdoor area should address potential nuisances such as:
- Noise from patrons
 - Noise from furniture/other equipment
 - Noise from sound systems/speakers
 - Time of day/night that the area is to be used for and the different activities that are planned to occur in the area.

DISPERSAL POLICIES

Licensing Policy 27

The Licensing Authority will normally require all licensed premises to be cleared of patrons within a reasonable period, usually 30 minutes, after the end of the time permitted for licensable activities. Where appropriate, or required by a responsible authority, the arrangements for clearing the premises should be incorporated in the operating schedule.

141. The general principle will be that the carrying on of licensable activities at premises should cease some time before the end of the operational hours granted by planning

consent to allow for the premises to be cleared of patrons in a gradual and orderly manner. The Licensing Authority recognises that the time required for clearing premises of patrons will differ from business to business depending on the type of licensable activities provided and the nature of the clientele. It is for applicants themselves to judge what time scale is reasonable however, the Licensing Authority recommends that between 30 minutes and a maximum of one hour would be sufficient for the majority of businesses.

142. Premises should have a Dispersal Policy in place to ensure minimum disruption to residents, using staff and door security outside the premises, directing customers in an orderly manner away from the premises and remaining outside until all customers have left the vicinity.

ENVIRONMENTAL BEST PRACTICE IN LICENSED PREMISES

Licensing Policy 28

Applicants are encouraged to provide evidence as to how they will promote environmental protection.

143. Islington has declared a climate emergency and is working to make Islington net zero in terms of carbon by 2030.
144. Licensees are encouraged to join the council in working towards net zero carbon by considering:
- Reducing energy usage and switching to green energy suppliers
 - Reducing food wastage and train staff in good practices
 - When choosing takeout and delivery containers, opt for compostable materials where possible
 - Focusing on reducing all types of waste and recycling where possible
 - Reducing use of vehicles and switching to bikes or electric vehicles where they continue to be needed
 - Supporting staff and customers who cycle to the licensed premises
 - Inform customers about the actions being taken
 - Buying from other businesses who are taking action to reduce their carbon footprint, including buying more locally.
145. In certain cases, the applicant's commitment to environmental protection will directly engage the licensing objectives. In others, an applicant's evidenced commitment may signify a high standard of corporate social responsibility. This may help to demonstrate that they can also be trusted to promote the licensing objectives. As such, applicants are encouraged to provide evidence as to how they will promote environmental protection. Where relevant and appropriate, the licensing authority will take such evidence into account and give due weight.

ADULT ENTERTAINMENT

Licensing Policy 29

The Licensing Authority expects all applicants and licensees intending to provide adult entertainment to include the relevant details in their operating schedule, including any controls they intend to put into place.

When considering applications, which include adult entertainment the Licensing Authority, will take into account the nature of the area, the marketing, and advertising arrangements and external views of the premises together with other factors proposed by the proprietor to mitigate against concerns.

146. Premises providing adult entertainment on a regular basis will be subject to the licensing regime for Sexual Entertainment Venues. Premises licenced under the Licensing Act 2003 that are exempt from this regime will be subject to the following paragraphs of this Policy.

147. The location of the premises will be an important factor as it can impact on all four of the licensing objectives. The licensing authority will take into account the cumulative effect of the premises on the area and whether applications for new and variation premises licences that are located in close proximity to sensitive premises should be granted.

Sensitive premises may include:

- residential accommodation,
- schools,
- children's and vulnerable persons' centres,
- youth and community centres,
- religious centres and public places of worship

CHILDREN AND LICENSED PREMISES

Licensing Policy 30

The Licensing Authority wants to encourage family friendly venues and does not seek to limit the access of children to any premises unless it is appropriate for the prevention of physical, moral or psychological harm. Applicants are expected to include its approach to admitting children in their operating schedule and any control measures that it intends to implement to prevent harm.

In determining applications for licenced premises that admit children without accompanying responsible adults the Licensing Authority will expect the operating schedule to contain enhanced measures for ensuring public safety and a safeguarding children policy.

148. The Licensing Authority has identified the Safeguarding and Quality Assurance Team, Child Protection, as the responsible authority for protecting children from harm.

149. The Licensing Authority supports the provision of licenced events and venues specifically for children and young people; however, it also recognises that children are one of the

most vulnerable groups in our society and that additional safeguarding and general safety measures may need to be put on place.

150. Where appropriate the Licensing Authority will expect appropriate management arrangements to be in place to safeguard children which may include:

- a safeguarding children policy
- limiting the hours when children may be present
- restricting access to specific parts of the premises
- requiring proof of age on admission
- limiting unobserved contact between employees and children
- increased staffing ratios
- Disclosure and Barring Service checks.

151. Operating schedules for venues showing films should explain the arrangements for compliance with British Board of Film Classification (BBFC) age restrictions in relation to any specialist film festivals or other screenings where films are not classified by the BBFC. In such cases, the Licensing Authority will require the submission of the film intended to be shown at least 28 days before the proposed screening so that it can apply an appropriate classification.

CHILDREN AND ALCOHOL

Licensing Policy 31

The Licensing Authority expects applicants and premises licence holders to implement appropriate measures, including Challenge 25 to prevent the sale of alcohol to children, including proxy sales when adults buy alcohol for children.

Applicants and licence holders providing remote sales of alcohol and alcohol delivery services should have arrangements in place to comply with age verification requirements at both the point of sale and delivery to customers.

152. Restricting access to alcohol for children under 18 has been a high priority area in Islington for many years to help reduce the anti-social behaviour and health issues associated with underage drinking. The Licensing Authority expects operating schedules to detail the arrangements for preventing underage sales and failure to implement controls is likely to result in additional controls and sanction with offenders running the risk of having their licences reviewed.

ENFORCEMENT

153. Enforcing the requirements of the Licensing Act 2003 is shared between the Police and the Licensing Authority with both organisations employing dedicated Licensing Officers who are co-located in Islington Council's offices in Upper St. The Police and Local Authority Licensing Officers are charged with the responsibility of ensuring compliance with licensing requirements and working with the licenced trade, other responsible authorities and council services to promote the licensing objectives.

154. The Police and Council Licensing Officers take a joined up approach to
- sharing information and intelligence
 - targeting inspection and monitoring resources toward agreed problem area and high risk premises,
 - joint problem solving tasking
 - follow up enforcement action.
155. Police Licensing Officers lead on significant crime and disorder issues associated with licenced premises and activities that involve other specialist officers within the Metropolitan Police.
156. Licensing Authority Licensing Officers lead on general non-compliance with licence conditions, residents' complaints, issues that may involve other teams within the council associated with public safety, protecting children from harm and public nuisance.
157. The Licensing Officers can task Operation Nightsafe Patrol Officers to deal with street based issues of concern to improve safety and reduce nuisance and antisocial behaviour arising from the night time economy activities.
158. Where there is evidence of a premises failing to comply with licence conditions or undermining the licensing objectives the premises licence holder will be invited to attend an Officer Panel to review the evidence and to agree an action plan to prevent recurrence. The Officer Panel, organised by the Licensing Authority, involves both the Police and Licensing Authority with representatives from other responsible authorities attending as and when required.

REVIEW OF PREMISES LICENCES

Licensing Policy 32

The Licensing Authority will apply the full range of powers available to it when a review of a premise licence becomes necessary, including:

- **Restricting hours of operation**
- **Removing licensable activities from the premises licence**
- **Imposing additional conditions**
- **Requiring the removal of a designated premises supervisor**
- **Suspending a licence**
- **Revoking a licence**

159. The Licensing Authority believes that the promotion of the licensing objectives is best achieved in an atmosphere of mutual co-operation between all stakeholders. Reviews will therefore be mainly reserved for circumstances where early warnings of concerns and the need for improvement have gone unheeded by the management of the licensed premises.
160. Reviews of licences may be triggered at any stage by responsible authorities or other persons because of a matter arising at the licensed premises and relating to one of the four licensing objectives. Reviews may also become necessary following the service of a

closure order by the police or any formal enforcement action by officers of the local authority.

161. Where a licence is revoked, any new application for the premises will be considered against the policy – there will be a full consideration of the applicant and the operating schedule with no assumption that a licensed premise can continue in that location.

If you have any questions about this policy, please contact:

Licensing Team
Islington Council
222 Upper Street
London N1 1XR

020 7527 3031 / licensing@islington.gov.uk

ALCOHOL RELATED HARM IN ISLINGTON

BACKGROUND

1. Alcohol-related harm in Islington is a particular cause for concern, with the borough experiencing some of the greatest levels of alcohol-related problems in London¹.
2. For many people alcohol plays an important and positive role in social and family life and contributes to employment and economic development locally. However, social traditions and economic benefits should not mask the fact that alcohol is a toxic substance that can have a detrimental effect on physical and mental health and wellbeing.

DRINKING LEVELS AND PATTERNS

3. The Chief Medical Officer's guideline for both men and women are that²:
 - To keep health risks from alcohol to a low level it is safest not to drink more than 14 units a week on a regular basis
 - If you regularly drink as much as 14 units per week, it is best to spread your drinking evenly over 3 or more days. If you have one or two heavy drinking episodes a week, you increase your risks of death from long term illness and from accidents and injuries.
 - The risk of developing a range of health problems (including cancers of the mouth, throat and breast) increases the more you drink on a regular basis.
 - If you wish to cut down the amount you drink, a good way to help achieve this is to have several drink-free days each week.

ALCOHOL RELATED HEALTH HARM

4. Regularly drinking more alcohol than the recommended daily limit can damage health. Excessive alcohol consumption is associated with over 60 medical disorders. For instance, alcohol has been identified as a causative factor in the following conditions³:
 - Mouth, throat, stomach, bowel, liver and breast cancer
 - Cirrhosis of the liver
 - Heart disease
 - Depression
 - Stroke
 - Pancreatitis
 - Liver disease
5. Islington currently experiences some of the greatest levels of alcohol related problems in London. For instance,⁴,
 - In 2020, there were 36.8 alcohol-related deaths per 100,000 population in Islington.

¹ <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

² - [UK Chief Medical Officers' Low Risk Drinking Guidelines \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/uk-chief-medical-officers-low-risk-drinking-guidelines.pdf)

³ - [Health matters: harmful drinking and alcohol dependence - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/health-matters-harmful-drinking-and-alcohol-dependence)

⁴ [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

Although this was the 6th highest rate in London, it was not statistically significantly different from the London (32.2 per 100,000 population) or England (37.8 per 100,000 population) averages. The rate in Islington has decreased since 2018, however there is no significant change in the trend.

- In 2020, there were 12.4 alcohol specific deaths per 100,000 population in Islington. This was 7th highest rate in London, although not statistically different from the London (9.9 per 100,000 population) or England (13 per 100,000 population) averages.
- For the period 2018/19 – 2020/21, the alcohol specific admission rate in those aged under 18 years in Islington was 23.5 per 100,000 population. This was the 3rd highest rate in London. Statistically, this is, significantly higher than the London average of 14.3 per 100,000 population, but lower (though not significantly) than the rate in England (29.3 per 100,000 population).
- For the period 2020/21 rates of alcohol specific hospital admissions were significantly higher in Islington than both London and England. The rate in Islington was 741 per 100,000 population, which was 4th highest in London. The rate in Islington has fluctuated since 2017 but overall has shown a decrease since 2013.
- For the period 2020/21, the alcohol related hospital admission rate was 423 per 100,000 population in Islington. Statistically, this is significantly higher than the London average (348 per 100,000 population) and similar to the England average. The rate in Islington has declined since 2016.

6. In 2020/21, 44 people in Islington died from a cause directly related to alcohol consumption⁴.
7. It is estimated that the annual total cost of alcohol consumption to society in England is £21 billion, comprising of NHS costs, alcohol-related crime and costs to the economy⁵. NHS costs alone equate to £3.5 billion per year⁵. Estimates from 2012 suggest the cost of alcohol-related admissions for Islington residents to be nearly £7.5 million, equivalent to £31 for every Islington resident⁶.
8. Between April 2019 and March 2020, there were 1122 ambulance call-outs responding to alcohol-related incidents in Islington⁷. Analysis has shown that the number of alcohol-related calls peak during the evenings and early hours, particularly at weekends, when the night-time economy is at its busiest. Calls tend to be clustered around areas where there is a high density of licensed premises and good public transport links, mirroring the same patterns seen for alcohol-related recorded crime and violent crime.
9. Given the scale of alcohol-related harm in Islington, a proactive and collaborative approach

⁵[Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://phe.org.uk)

⁶ Murage P, Hamm J and Feleke R. Closing time. Counting the cost of alcohol attributable hospital admissions in London. London Health Observatory, 2012

⁷ GLA Safestats 2022

is required to reduce its detrimental health impacts. Alcohol harm reduction has been identified as a priority issue by Islington Health and Well-Being Board and previous research has confirmed a strong reduction in alcohol related hospital admissions in areas with a more robust approach to licencing policy and more intense scrutiny of alcohol licence applications⁸.

AVAILABILITY OF ALCOHOL

10. The price of alcohol increased by 26% between 2010 and 2020. However, as prices of other retail goods increased faster and incomes grew by 9% over the same period, alcohol became 12.5% cheaper in relative terms⁹. An extra 12.6 million litres of alcohol were sold in shops and supermarkets in 2020/21 compared to 2019/20. This is despite pubs, clubs and restaurants closing during the national lockdowns of the pandemic.
11. There is national and international evidence that availability of alcohol is linked to alcohol consumption and alcohol related harm¹⁰. Evidence indicates that increasing the numbers of outlets or extending hours of alcohol sale potentially increases the competitive pressures on existing outlets, which may result in price reductions that tend to lead to increased levels of consumption¹¹. This is supported by work from the National Institute for Health and Care Excellence (NICE)¹² who, in an evidence review updated in 2019, found that reducing the density of licensed outlets in a given area and the days and hours when alcohol can be sold is an effective way of reducing harm.
12. Studies have found that alcohol outlet density is associated with lower life expectancies due to its negative associations with levels of community disadvantage and violence¹³. High alcohol outlet density may also be associated with increases in hospital admission rates due to assault or alcohol-related disease. A study which reviewed alcohol outlet density and alcohol related hospital admissions in England, found that higher densities of on-licensed outlets were associated with higher hospital admission rates for acute and chronic conditions wholly attributable to alcohol consumption¹⁴. The study also found that with regard to off-

⁸ de Vocht F, Heron J, Angus C, et al. Measurable effects of local alcohol licensing policies on population health in England. *J Epidemiol Community Health* 2016;**70**:231-237.

⁹ NHS Digital (2022). Statistics on Alcohol, England 2021. <https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-alcohol/2021/part-3>

¹⁰ <https://www.gov.uk/government/news/alcoholic-liver-deaths-increased-by-21-during-year-of-the-pandemic>

¹¹ [1 Recommendations | Alcohol-use disorders: prevention | Guidance | NICE](#). Updated July 2019

¹² Popova S, Giesbrecht N, Bekmuradov D, and Patra J. Hours and Days of Sale and Density of Alcohol Outlets: Impacts on Alcohol Consumption and Damage: A Systematic Review. *Alcohol & Alcoholism* 2009;44(5):500–516

¹³ - NICE. Alcohol-use disorders: prevention. Published June 2010. Updated July 2019

¹⁴ Popova S, Giesbrecht N, Bekmuradov D, and Patra J. Hours and Days of Sale and Density of Alcohol Outlets: Impacts on Alcohol Consumption and Damage: A Systematic Review. *Alcohol & Alcoholism* 2009;44(5):500–516

¹⁵ - NICE. Alcohol-use disorders: prevention. Published June 2010. Updated July 2019

¹⁶ Popova S, Giesbrecht N, Bekmuradov D, and Patra J. Hours and Days of Sale and Density of Alcohol Outlets: Impacts on Alcohol Consumption and Damage: A Systematic Review. *Alcohol & Alcoholism* 2009;44(5):500–516

¹⁷ - NICE. Alcohol-use disorders: prevention. Published June 2010. Updated July 2019 <https://www.nice.org.uk/guidance/ph24>

¹⁸ [Understanding the relationship between alcohol outlet density and life expectancy in Baltimore City: The role of community violence and community disadvantage - https://pubmed.ncbi.nlm.nih.gov/30506926/](#)

¹⁹ [Alcohol outlet density and alcohol related hospital admissions in England: a national small-area level ecological study - https://pubmed.ncbi.nlm.nih.gov/30125420/](#)

licenced outlets, convenience stores were associated with the highest rate of hospital admissions for acute and chronic wholly attributable conditions¹³. This highlights the local impact of off-licence sales of alcohol and is reinforced by the findings of a study from Scotland which identified that alcohol related hospitalisations of those under the legal minimum drinking age were also related to off-site outlet densities¹⁵. This emphasises the importance of addressing off-licence sales in harm reduction and licensing work.

13. Several studies have looked at the impact of changing licensing hours on alcohol-related hospital admissions. The Licensing Act (2003) removed restrictions on trading hours for alcohol outlets, in hopes of staggered crowd dispersal and reduced violent behaviour. Availability theory would suggest that by increasing the physical availability of alcohol, the rate of physical and social harm would also increase. The Licensing Act 2003 (which came into effect in 2005) extended the opening hours for alcohol venues in UK, with the potential for up 24hour drinking. Following its introduction, a retrospective study carried out at the emergency department of St Thomas' Hospital in London compared alcohol harm data from before and after the introduction of the new legislation. Comparing data from March 2006 with March 2005, there was a 5.1% increase in alcohol-related attendances, 0.9% increase in alcohol related assault, 2.5% increase in alcohol related injury and 1.9% increase in alcohol-related admissions¹⁶. Following the implementation of the Act, there was a shift in the pattern of alcohol attendances to accident and emergency departments; a higher proportion of attendances were observed between midnight to 3am before its implementation compared to between 3 a.m to 6 a.m. after its implementation. Such changes may have implications for the capacity and delivery of emergency services¹⁷.

BINGE DRINKING AND PRELOADING

14. It is not only the amount of alcohol consumed that increases the risk of harm, but also the amount consumed in one sitting. Binge drinking, which refers to a pattern of drinking in which a person consumes a lot of alcohol in one sitting (defined as women drinking more than 6 units, men more than 8 units), can cause acute intoxication and lead to acute, short-term problems. Immediate risks of harm (which can sometimes be fatal) include accidents and injuries as well as alcohol poisoning linked to drinking a large amount of alcohol on one occasion, which often leads to drunkenness.
15. Alcohol-attributable injuries are commonly sustained from an episode of acute heavy alcohol consumption¹⁸, leading to reduced cognitive functioning and increased risky behaviours.

20 Richardson, EA, Hill, SE, Michell, R, Pearce, J and Shortt, NK. Is local alcohol outlet density related to alcohol-related morbidity and mortality in Scottish cities? *Health and Place*, 2015; 33, 172-180

²¹ Newton A, Sarker SJ, Pahal GS, van den Bergh E, Young C. Impact of the new UK licensing law on emergency hospital attendances: a cohort study. *Emerg Med J*. 2007.;24(8):532-4

²² [An evaluation of alcohol attendances to an inner city emergency department before and after the introduction of the UK Licensing Act 2003 -https://pubmed.ncbi.nlm.nih.gov/18976454/ PubMed \(nih.gov\)](https://pubmed.ncbi.nlm.nih.gov/18976454/)

¹⁸ Taylor B, Irving HM, Kanteres F, et al. The more you drink, the harder you fall: a systematic review and meta-analysis of how acute alcohol consumption and injury or collision risk increase together. *Drug Alcohol Depend*. 2010;110(1-2):108-116. doi:10.1016/j.drugalcdep.2010.02.011

16. It was estimated that during the period 2015-2018, 20.8% of Islington residents binge drank on their heaviest drinking day, which is higher than the estimate for England (15.4%) and higher than the London average (14.6%)¹⁹. In the period 2020/21, there were 86 hospital admissions for alcohol-related unintentional injuries in Islington, which equated to 47.3 per 100,000 population. This is higher than the London and England average, but not statistically different. There has been no significant change in the rate of alcohol-related injuries in Islington since 2017⁵.
17. The detrimental impact of binge drinking in Islington is particularly significant because of the vibrant night-time economy which attracts visitors from across London as well as further afield.
18. Most common in younger age groups, binge drinking is often associated with 'preloading'. Preloading is a term that relates to people, particularly young people, drinking alcohol at home or in streets before going on to pubs and clubs. It has been associated with higher overall alcohol consumption and a greater likelihood of being involved in a violent incident²⁰.
19. People pre-load on alcohol because it's much cheaper to buy in the supermarket or other off-licence than in a pub or bar. More people are now drinking at home, approximately 70% of UK alcohol sales are purchased through the off trade with supermarkets accounting for two-thirds of these sales²¹. For instance, in 2014 10.6 units of alcohol per adult per week were sold through the off-trade in England, with wine sales making the largest contribution (39% of total off-trade alcohol sales)²². A UK based survey conducted in 2020 found that off-trade alcohol sales had a year-over-year growth rate of 24%, with beer sales increased by 66% from April - June. This highlights the importance of considering the impact of the off-licence trade within local licensing policy.
20. Later closing hours of licensed premises and cheap off-licensed alcohol create problems for the on-trade sector because customers can attend premises intoxicated from drinking at home. It is against the law to serve alcohol to those who are intoxicated, but research in the UK shows this law is routinely broken. A study conducted in Liverpool in 2013 found that 84% of alcohol purchase attempts by pseudo-intoxicated actors in pubs, bars and nightclubs were successful (i.e., alcohol was sold to the actor)²³. It was noted in this study that bar servers recognised the signs of intoxication, but still served them and in some cases attempted to upsell alcohol to the actors. This reinforces the importance of enforcing adherence to local policies and ensuring preventing alcohol sales to intoxicated customers is a public health priority.
21. Multi-component programmes are the best approach to addressing issues relating to

¹⁹ Public Health England (2021) – percentage of adults' binge drinking on heaviest day. [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

²⁰ O Hughes K, Anderson Z, Morleo M, Bellis MA. Alcohol, nightlife and violence: the relative contributions of drinking before and during nights out to negative health and criminal justice outcomes. *Addiction*. 2008 Jan;103(1):60-5.

²¹ [Microsoft Word - FS industry.docx \(ias.org.uk\)](https://ias.org.uk/) January 2018

²² [LAPE March 2017 statistical commentary.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/)

²³ Hughes, K, Bellis, MA, Leckenby, N, Quigg, Z, Hardcastle, K, Sharples, O, Llewellyn, D (2014) Does legislation to prevent alcohol sales to drunk individuals work?

preloading. These aim to reduce alcohol-related harm in drinking environments by co-ordinating and strengthening local preventative activity. If effective, they can help reduce costs to health services, criminal justice agencies and other public services. These typically include efforts to mobilise communities, such as media campaigns and community forums, supporting and working with licensed premises such as server training and voluntary schemes to avoid easy access to cheap alcohol from off-licences (such as through reduced the strength campaigns and not selling single cans and bottles) and increased enforcement activity, such as targeted visits and training.

STREET DRINKING

22. Street drinkers (including those who are homeless and those who are vulnerably housed) are likely to be a subset of a wider group of change-resistant drinkers who are particularly vulnerable. Their drinking is likely to be having a significant impact on their health as well as causing a range of problems in the local community. A small number of street drinkers can incur significant costs: crime and anti-social behaviour on the street but also associated costs such as hospital visits, repeated 999 calls and the opportunity costs of resources used to target their needs. Alcohol Concern's Blue Light project²⁴ estimated that the average annual cost of a high risk, change resistant drinker is around £36,000 and £48,000 per year, including health, criminal justice and anti-social behaviour costs.
23. Street drinkers depend on a local supply of alcohol. They tend not to buy large quantities for fear that it will be confiscated, or that they will be targeted by other drinkers. Therefore, most need to be near shops²⁵. They also tend to drink particularly high strength, cheap alcohol such as white cider. For instance, one study in Glasgow and Edinburgh showed 25% of alcohol treatment patients drink white cider, and of these 45% drink it exclusively²⁶. According to ThamesReach²⁷, which works with rough sleepers in London, "super-strength drinks have become one of the biggest causes of premature death of homeless people in the UK", with their data indicating that super-strength drinks are doing more damage than both heroin and crack cocaine, with 78% of the deaths in ThamesReach hostels are attributed to high strength alcohol.
24. 2016 guidance from the Police and Crime Commissioners²⁸ suggest that a multicomponent approach is needed to tackle street drinking, which includes a multiagency group, alcohol services which provide outreach and supports change resistant drinkers and appropriate

²⁴ Alcohol Concern. Alcohol Concern's Blue Light Project Working with change resistant drinkers, 2014

²⁵ 5 Ward, M (2009) Tackling Street Drinking PCC guidance on best practice: Supporting evidence. Alcohol Concern. [Police and Crime Commissioner Report updates 15.11.indd \(apccs.police.uk\)](#)

²⁶ 6 Black, H. et al White Cider Consumption and Heavy Drinkers: A Low-Cost Option but an Unknown price. Alcohol and Alcoholism, 2014; 49:6, pp675-80

²⁷ Thames Reach. Calls for high-strength cider duty increase. Available from: < <http://www.thamesreach.org.uk/news-and-views/calls-for-high-strength-cider-duty-increase>

²⁸ National Consortium of Police and Crime Commissioners (2016) Tackling Street Drinking: Guidance on Best Practice. [Police and Crime Commissioner Report updates 15.11.indd \(apccs.police.uk\)](#)

legal powers aimed at individuals. This needs to be supported by a retail environment which discourages street drinking.

25. Initiatives designed to tackle the problems associated with street drinking have removed the sale of low-priced, high strength alcohol products, through voluntary agreements with local retailers. Such schemes termed 'Reduce the Strength' schemes have resulted in a reduction in crime, anti-social behaviour and alcohol related harm through impacting alcohol availability and consumption. This scheme, borne from successes seen in Ipswich, demonstrated a 61% reduction in the numbers of street drinkers and a 75% reduction in antisocial behaviour²⁹. A study across Camden & Islington³⁰ found that Reducing the Strength achieved high rates of voluntary compliance from retailers and an increase in the price of the cheapest available unit of alcohol for purchase.
26. Cumulative Impact Areas can also support areas particular affected by street drinking²⁵. Through the use of policies not 'aimed' at the night-time economy but instead targeting off-licences and late night refreshment in areas with significant health inequality and a large number of hostels. This can include marking initiatives to identify where cans used by street drinkers came from and having targeted patrols from the police in areas where there are concerns. Such measures can have a significant impact on alcohol related crime and anti-social behaviour.

ALCOHOL RELATED VIOLENCE

27. Islington experiences a considerable amount of alcohol related crime and anti-social behaviour. Between April 2018 and March 2020 there were 1,013 offences marked by police as alcohol-related, and between April 2018 and December 2021 there were 1,028 reports of alcohol-related anti-social behaviour³¹.
28. Analysis of alcohol mis(use) in Islington has shown that the highest levels of alcohol related crime occur Friday, Saturday and Sunday³². The particularly peak times are;
- Saturday midnight to 3am and 9pm to midnight
 - Sunday midnight to 3am.
29. There is a clear positive correlation between the density of licensed premises, ambulance callouts and alcohol related crime³². This association is observed at a higher concentration in designated cumulative impact areas³¹. During 2010 – 2016, there was a decline in total crime and antisocial behaviour in Islington after the introduction of Cumulative Impact

²⁹ [Reducing the supply of high strength alcohol - Drink and Drugs News](#)

³⁰ Sumpter, C., McGill, E., Dickie, E. *et al.* Reducing the Strength: a mixed methods evaluation of alcohol retailers' willingness to voluntarily reduce the availability of low cost, high strength beers and ciders in two UK local authorities. *BMC Public Health* **16**, 448 (2016). <https://doi.org/10.1186/s12889-016-3117-7>

³¹ Islington Public Protection Briefing – Alcohol Related Crime and ASB. May 2022

³² Islington Council Public Health. The impact of alcohol harm in Islington, April 2018 to March 2020. May 2022

Policy³². Despite this, it was estimated in 2017 that 54% of alcohol related offences are violent crimes³². In line with crime trends, reports of alcohol-related crime decreased during Covid lockdowns in 2020 and have since increased³¹.

30. Studies have shown that intoxication can lead to violent behaviour in those predisposed to aggression and it has been suggested that consumption leads to weakened inhibitions and relaxed normative behaviour (i.e., perceived allowance of aggression). This can result in an increased risk of alcohol-related violence inside and around drinking premises. For instance, Livingston et al³³ found that all types of licence were significantly associated with admissions to hospitals because of assault. The largest effect size was for off-licences (0.54), with smaller effect sizes for general (0.13) and on-premises licences (0.06). It has been noted that local authorities with stricter alcohol licensing policies have seen greater declines in alcohol-related crime, with violent crime reduced from 6.1 to 4.9 per 1000 people from 2009 to 2013 compared to a reduction of 3.9 to 3.3 per 1000 people in areas with 'lighter' policies³⁴.

31. Glassing related violence is another important issue that can be addressed through licensing. A "glassing" is a physical attack using glassware as a weapon. These attacks especially affect bars and clubs, where glassware is the principal weapon in licensed premises related violence. Glassing-related injuries are often very serious and are likely to include eye and facial injuries. In the period 2012 - 2017, there were 282 offences in Islington whereby glass/bottles were used as a weapon.

32. It is estimated that 80,000 glass and bottle attacks occur in the UK each year, accounting for 4% of violent crime³⁵. These attacks, fuelled by alcohol, put a huge strain on NHS resources. The Licensing Act 2003 enables licensing authorities to require glassware to be replaced by safer alternatives in individual licensed premises where a problem has been identified and representations have been made. The impact of such action has been found to be positive:

- In Lancashire, a study into the differences between annealed glass, and polycarbonates found that there were no glass breakages in the venues with polycarbonates³⁶. Surveys suggest that patrons were happy to use polycarbonates, and that this did not affect sales in licensed premises.
- In 2006 Glasgow City Council banned glassware from all venues holding an Entertainment Licence within the city's centre during the hours after midnight. Drinks had to be served in toughened glass or other recognised safety products. No conventional glass bottles, whether open or sealed were allowed to be given to

³³ Livingston M, Chikritzhs T, Room R. Changing the density of alcohol outlets to reduce alcohol-related problems. *Drug Alcohol Rev.* 2007;26(5):557-66

³⁴ De Vocht F, Heron J, Campbell R, et al - Testing the impact of local alcohol licencing policies on reported crime rates in England. *J Epidemiol Community Health* 2017;71:137-145

³⁵ Kershaw C, Nicholas S, Walker A. (2008) Crime in England and Wales 2007/08. Findings from the British Crime Survey and police recorded crime. London, Home Office

³⁶ Anderson Z, Whelan G., Hughes K, Bellis M. Evaluation of the Lancashire polycarbonate glass pilot project. Lancashire Constabulary. Liverpool JMU Centre for Public Health, 2009

customers. The impact of this was assessed in 2007 and the findings were positive, with customers feeling safer in these venues, and a reduced risk of injury observed³⁷.

CHILDREN AND ALCOHOL

33. CMO guidelines³⁸ state that an alcohol-free childhood is the healthiest and best option. However, if children drink alcohol underage, it should not be until at least the age of 15 years. If young people aged 15 to 17 years consume alcohol, it should always be with the guidance of a parent or carer or in a supervised environment. Parents and young people should be aware that drinking, even at age 15 or older, can be hazardous to health and that not drinking is the healthiest option for young people.
34. If someone is under 18, it's against the law:
- To sell them alcohol
 - For them to buy or try to buy alcohol
 - For an adult to buy or try to buy alcohol for them
 - For them to drink alcohol in licensed premises (e.g., a pub or restaurant)
35. It was estimated that in the period 2014/15, 40% of children in Islington had had an alcoholic drink by the age of 15, which is comparable to the London average (41%) and significantly better than the England average (62%). National data also suggests a decline in the proportion of young people who have drunk alcohol, with more recent figures in 2018 indicating 44% of children under the age of 15 in England had never drunk alcohol³⁹. For those young people who did drink alcohol, the most commonly reported sources were friends (21%), parents (20%), asking someone else to purchase alcohol (proxy sales, 13%) and taking alcohol from home (12%)⁴⁰.
36. Consideration also needs to be given to the harm alcohol causes to people other than the person who is drinking, sometimes referred to as 'social harm' or 'passive drinking'. Children of parents misusing alcohol may experience severe emotional distress, physical abuse and violence as well as neglect, lack of support and protection. There may be consequential risks of children becoming young carers for their parents.

³⁷ A Forsyth. Banning glassware from nightclubs in Glasgow (Scotland): Observed impacts, compliance and patron's views. *Alcohol & Alcoholism*, 2017; Vol. 43, No.1 p 111-117.

³⁸ CMO. Guidance on the consumption of alcohol by children and young people, 2009 [Guidance on the consumption of Alcohol by children and young people \(ias.org.uk\)](https://www.ias.org.uk/guidance-on-the-consumption-of-alcohol-by-children-and-young-people)

³⁹ NHS Digital. (2019). Smoking, drinking and drug use among young people in England - 2018: part 5 – drinking prevalence and consumption. Table 5.1. [Online]

⁴⁰ Fuller E. (Ed.) Smoking, drinking and drug use among young people in England in 2011. Leeds: NHSIC, 2012

37. Alcohol consumption is also a major contributor in domestic violence. In England, 32% of victims believes their partner had been drinking prior to the physical assault⁴¹.

38. Children and young people experience significant harm as a result of alcohol. Islington has the 3rd highest rate in London of under-18 hospital admissions for alcohol specific conditions, for the period 2018/19 to 2020/21 the rate in Islington was 23.5 per 100,000. This is, statistically, significantly higher than the London average of 14.3 per 100,000. It should also be noted that this figure only reflects young people admitted to hospital as a result of their alcohol use. Although data is not currently available, we know that an even higher number of young people will be taken to A&E because of their alcohol consumption but not admitted to hospital. This highlights the importance of working collectively to develop and enforce good practice that will deter children in Islington from alcohol consumption and the harms associated with it.

BEST PRACTICE

39. Evaluation shows that the Borough of Islington's Licencing Strategy and the CIP have reduced alcohol related harms without negatively impacting on the overall night-time economy in Islington and the ability of alcohol retailers to operate if they meet the conditions required⁴².

40. Islington strongly promotes working in partnership with licensed premises and the adoption of high standards of management at all premises. We recognise that many licensees are supportive of the need to address the health issues relating to alcohol and suggest the following actions that can be adopted through conditions:

- Restrict "special offers" like discounted shots; 'Happy Hours'; buy one get one free; or buy 2 glasses of wine, get the whole bottle. This will slow down consumption, the rate at which blood alcohol concentrations increase and the peak levels reached by drinkers. Rapidly ascending and high blood alcohol concentrations, often linked to special offers on alcohol are known to be associated with violence and uninhibited behaviour.
- Reduce stigma around licences offering non-alcoholic drinks and encourage premises to engage in awareness events such as 'Dry January'.
- Restrict drinking games associated with consuming large quantities of alcohol at a fixed or discounted price.
- Operation of a strict "No ID – No Sale" policy such as the Challenge 25 age verification scheme. This is already endorsed by Islington and includes checks that

⁴¹ World Health Organisation (WHO) : Intimate partner violence & alcohol. [fs_intimate.pdf \(who.int\)](https://www.who.int/fs_intimate.pdf)

⁴² [Evaluating the impact of a Cumulative Impact Zone Policy to reduce alcohol-related harms in Islington Local Authority - NIHR School for Public Health Research NIHR SPHR](#)

require presentation of credible photographic proof, which will be either a passport, photographic driving licence or proof of age card carrying a PASS logo.

- Premises should consider installing till prompts to remind staff to ask for proof of age
- Premises should consider highlighting through display of posters that it is an offence to purchase alcohol for underage persons.
- Align pricing with Alcohol by Volume (ABV) and ensure that non-alcoholic drinks are kept much cheaper.
- Actively promote designated driver schemes where a driver is offered discounted or free non-alcoholic drinks.
- Use of materials such as posters and beer mats in order to promote moderate consumption of alcohol along with information as to the units of alcohol in individual drinks and the recommended guidelines for consumption of alcohol.
- Increase seating for customers to reduce more intensive drinking.
- Reduce the volume of music as loud music can increase alcohol consumption.
- Make food available in late venues.
- Drinks should be served in toughened glass or other recognised safety products to reduce the risks of glassware-related injuries.
- Start the sale of alcohol later in the day and not align it purely with opening hours.
- No advertisements for alcohol in the shop window.
- Storing alcohol behind the shop counter.
- No display boards or other advertising showing on the shop floor.
- Cans of alcohol should not be sold singly.
- Bottles of beer under 1 litre should not be sold singly.
- No beer or cider over 5.5% ABV should be sold.
- No alcopops should be sold where they could attract under age purchasers.

Review of the Cumulative Impact Policy 2022

Licensing Act 2002

1.0 Introduction

In 2017 the council introduced several cumulative impact policies to help manage the adverse impacts of increasing numbers of premises selling alcohol. The council is now required to review this policy decision and to consult stakeholders on its proposal to retain its cumulative impact policies in relation to the sale of alcohol.

2.0 What is a cumulative impact policy?

As a Licensing Authority the council is required to ensure that any decision relating licence applications for the sale of alcohol, regulated entertainment or late-night refreshment is consistent the four licensing objectives:

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance
- the protection of children from harm

Each licence application must be considered on its merits however it is recognised that in some areas the cumulative affects effects of multiple premises in a specific area or locality may have the potential to undermine one or more of the licensing objectives. Where this is the case, the council may introduce a cumulative impact policy.

A cumulative impact policy creates the presumption that new and variation applications for premises that are likely to add to the cumulative impact will normally be refused unless the applicant is able to comprehensively demonstrate in their operating schedule that granting the application will not undermine one or more of the licensing objectives.

The cumulative impact policy to refuse an application can only be invoked if the council receives representations from residents, interested parties or responsible authorities regarding the granting of a new premises licence of varying an existing licence.

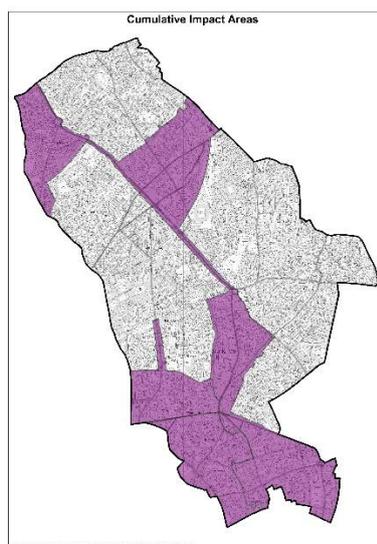
The exception to Islington's cumulative impact policy are applications that meet the following criteria:

- a. The provision of mixed use or flexible premises that support the people visiting the area during the day or support the wider cultural offer in the area
- b. Premises that are not alcohol led
- c. Premises with hours of operation consistent with framework hours described in the Licensing Policy
- d. Premises supplying alcohol for consumption on the premises with robust arrangements to prevent vertical drinking, for example fully seated venues
- e. Premises that can demonstrate high standards of management with respect to preventing public nuisance associated with waste management & littering
- f. Proactive support and commitment from the premises licence holder to:
 - actively support Pub watch through regular attendance and engagement at meetings
 - adopt the best practice standards described in the council's licensing policy

3.0 Cumulative Impact Areas

The cumulative impacts areas are those parts of the borough where there is the highest location of licenced premises.

The areas highlighted in purple of the map below show the location of cumulative impact areas for premises selling alcohol for consumption on the premises.



In addition, there is a borough cumulative impact area relating to premises selling alcohol for consumption off the premises.

4.0 Cumulative Impact Review

The 2022 Cumulative Impact Review has considered the following indicators to assess whether it is appropriate to retain, modify or dispense with one of more of the existing cumulative impact areas:

- Applications received
- Alcohol related antisocial behaviour, crime, and disorder
- Licensing Team complaints and referrals
- Alcohol related ambulance callouts
- Views key stakeholders:
 - Licensing Committee
 - Metropolitan Police
 - Public Health

4.1 Applications

Since 2017 there has been a 16% increase in the number of premises licenced under the Licensing Act 2003 in Islington. There are currently 1483 licenced premises, of which 122 are licenced for the sale of late-night refreshment only. During the 5-year period April 2017 to March 2022 the council considered 482 new and variation applications for premises licence, the majority of which were for premises located in cumulative impacts areas.

Table 1 below shows the number, type and location of applications received during the period 1 April 2017 and 31 March 2022

Applications	Number of New Application	Number of Variation Applications	Total Number of applications
Premises inside cumulative impact areas	342 (88%)	81 (86%)	423 (88%)
Premises outside cumulative impact areas	46 (12%)	13 (14%)	59 (12%)
Total Number of applications	388	94	482

Table 2 below shows the outcome of licence applications by number, application type and location during the period 1 April 2017 and 31 March 2022.

Application Outcome	Application Granted	Application refused	Total Number of applications
Premises inside cumulative impact areas	385 (91%)	38 (9%)	423
Premises outside cumulative impact areas	55 (93%)	4 (7%)	59
Total Number of applications	440	42	482

Analysis

The applications and outcome data indicates that:

- The cumulative impact areas continue to contain the highest concentration of licence premises.
- The low refusal rate indicates that most applications have been submitted with robust operating schedules that reflect the council's licensing and cumulative impact policies.

4.3 Alcohol related crime, disorder

The Council's Community Safety Team have analysed the council's data on alcohol related antisocial behaviour and police data on alcohol related crime and disorder for the period 2018-2021. The full report is contained in Appendix B.

Key headlines are:

- The number of alcohol related ASB calls peak in general up to 1 hour after the framework hours indicated in the Licensing Policy
- There is a strong correlation between the location of alcohol related ASB calls and the number of licensed premises within small geographical areas
- There is a concentration of alcohol related antisocial behaviour calls within Cumulative Impact Areas near clusters of licensed premises
- Alcohol related ASB is focussed much more in nighttime economy areas/ town centres.
- The volume of alcohol flagged crime peaks shortly after framework hours.
- There is a concentration of alcohol related crime within Cumulative Impact Areas near clusters of licensed premises.

Analysis

The antisocial behaviour and crime data indicates that:

- there is a correlation between alcohol related antisocial behaviour, crime and disorder and the concentration of licenced premises
- the concentration of licenced premises and antisocial behaviour and crime hotspots during the period 2018 to 2021 is consistent with the previous period from 2014-2017.

4.4 Licensing Team complaints and referrals

Licensing Team are responsible for ensuring compliance with licensing requirements and for investigating complaints from residents and referrals from partners They work in close collaboration with the Police and the Late Night Levy funded Nightsafe Patrol Service.

Table 3 below shows the number of licensing complaints and referrals for the period 1 April 2017 to 31 March 2022.

Licensing Complaints and Referrals	Complaints from residents and ward councillors	Referrals for follow up investigation	Total
Premises inside cumulative impact areas	179	572	751
Premises outside cumulative impact areas	47	71	118
Total	226	643	869

Analysis

The Licensing Complaint and referrals data indicates:

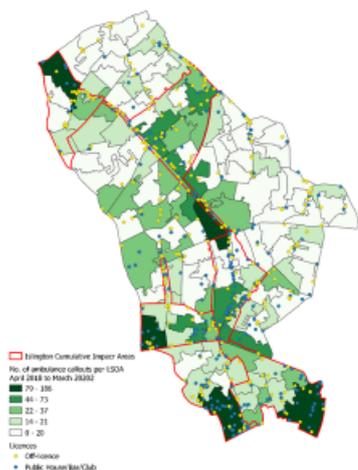
- 86% complaints and referral requiring licensing Team intervention related to premises located in cumulative impact policy areas

4.5 Alcohol related ambulance callouts

As a designated Responsible Authority under the Licensing Act 2003, the Council's Public Health Team have reviewed the impact of alcohol related harm in Islington for the period April 2018 to March 2020. The full Public Health review will be published on the council's website as part of the public consultation on the Council's Licensing Policy 2023 to 2027.

The two charts below are extracts from the Public Health Report.

Alcohol-related ambulance callouts & density of premises

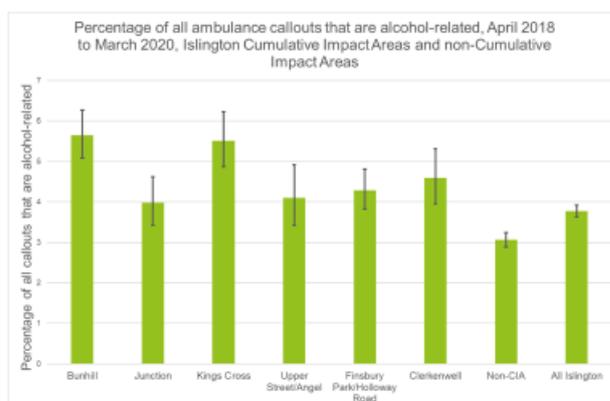


- There was a total of 2438 alcohol-related ambulance callouts in Islington between April 2018 and March 2020, an average of 10 per Lower Layer Super Outlet Area (LSOA) per year
- Areas with large concentrations of licensed premises tend to have greater numbers of alcohol-related ambulance callouts, which includes incidents involving visitors to Islington's night time economy. This is in contrast to alcohol specific hospital admissions (page 9), where higher rates tend to be in areas with fewer licensed premises, reflecting incidents amongst residents only.
- The darkest shaded areas on the map show the LSOAs where there were greater numbers of alcohol-related ambulance callouts. These are at Archway in the north of the borough, Holloway Road between the junction with Liverpool Road and Highbury Corner.
- Islington's Cumulative Impact Areas are shown with red borders, and the map shows that they are associated with a greater density of public houses, bars, clubs, and off-licences, as well as a greater number of alcohol-related ambulance callouts.

Source: GLA Safestats 2021, Islington Council Licensing Department



Alcohol-related ambulance callouts and cumulative impact areas



- The graph to the left shows the proportion of ambulance callouts that were alcohol related for each Cumulative Impact Area, non-Cumulative Impact Areas, and Islington as a whole.
- The proportion of ambulance callouts in all six cumulative impact areas was significantly higher than in non-cumulative impact area.



Analysis

The alcohol related ambulance data indicates:

- Areas of Islington with high numbers of licensed premises generally have higher numbers of alcohol-related ambulance callouts

- The proportion of ambulance call outs was significantly higher in cumulative impact area

4.6 Views of partners and key stakeholders

As part of the review of Islington's cumulative impact policies the council has sought the view of the following key stakeholders:

Licensing Authority

- LBI Executive Member for Community Safety
- Chair of Licensing Committee
- Licensing Committee

Metropolitan Police

- Islington Police Islington Team, delegated by the behalf of the Metropolitan Police Commissioner act as the 'responsible authority' for the Police with respect the licensing matters within the borough of Islington

Director of Public Health (Islington)

The above stakeholders have indicated that the application of the cumulative impact policy over the last 5 years has provided an invaluable mechanism to secure promotion of the four licensing objectives in Islington

The stakeholders agree that it is appropriate to publish the review of the cumulative impact policy and to seek the views of business, residents, and their representative organisations over the proposal to retain the existing cumulative impact policies.

The Cumulative Impact Policy consultation will form part of the wider 2023- 2027 Licensing Policy consultation

5.0 Statutory Consultation Requirements

Details of the consultation requirements are in Appendix A

Appendix A Consultation Requirements

Statutory Consultees: Licensing Act 2003 Section 5(3)

1. The chief officer of police for the licensing authority's area
2. London Fire Brigade
3. Director of Public Health
4. Such persons as the licensing authority considers to be representative of holders of premises licences issued by that authority
5. Such persons as the licensing authority considers to be representative of holders of club premises certificates issued by that authority,
6. Such persons as the licensing authority considers to be representative of holders of personal licences issued by that authority
7. Such other persons as the licensing authority considers to be representative of businesses and residents in its area.

Reasons for Publishing a Cumulative Impact Policy

The council published its first cumulative impact policy in 2017 and the reasons for the proposal are described in the Licensing Policy 2018 - 2022. A review of the cumulative impact policy has been conducted as part of the wider 5 yearly review of Licensing Policy. The indications are that the cumulative impact policies have achieved the following objectives:

- To promote the four licensing objectives in a borough which has one of the highest concentrations of licenced premises in England and where there is no delineation between residential and commercial areas
- To enable to Licensing Authority to balance the needs of residents, businesses and the local economy

The 2022 cumulative impact policy review has indicated the underlying reasons for selecting areas for cumulative impact still exist, their remains a high concentration of licenced premises in specific parts of the borough and these areas continue to be hotspot areas for antisocial behaviour, crime, disorder, licensing complaints and ambulance callouts.

Areas Covered by the Cumulative Impact Policy

Sale of alcohol in the following areas of Islington

Clerkenwell

Bunhill

Kings Cross

Upper Street and Angel

Holloway and Finsbury Park

Archway

Please use the following link to the council's Islington Interactive Maps to identify the exact location of cumulative impact area boundaries go to:

[Islington Map](#)

(Then select Show Layers, followed by Licensing and Business, then Cumulative Impact Areas)

Sale of alcohol for consumption off the premises (i.e. off sales)

All areas of the borough

Licensing Policy 2023-2027

Consultation Feedback and LBI Response

October 2022

Section 1 Bespoke Responses

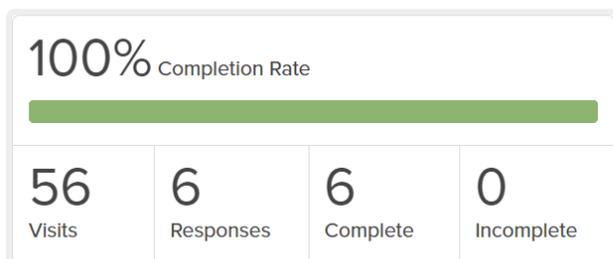
Consultation Feedback	LBI Response
1. Angel.london Business Improvement District	
<p>Thank you for the opportunity to respond to Islington Council's licencing review. Angel.london Business Improvement District exists to champion and support the Angel economy on behalf of our some 550 members, including dozens of licenced premises, including alcohol-led venues, cultural institutions, restaurants and cinemas.</p> <p>We know that Islington Council understands the extraordinary pressures on businesses, past, present and to come, and we are grateful to the Council for its continued support of the local economy in balancing the needs of businesses with those of residents.</p> <p>We make this response not on behalf of any specific members, who will respond as individual licensees, but instead seek to consider the needs of the economy as a whole.</p> <p>We would wish to make a number of specific comments:</p> <ol style="list-style-type: none"> 1. Islington Council introduced a Late Night Levy for licenced premises that operate beyond midnight, and this levy funds the Night Safe Team and the police licensing team. The BID would seek a reintroduction of the regular meetings that took place before the pandemic to oversee the tasking of Night Safe and defrayal of the levy. Given the scheme has been in operation for a number of years, we would also recommend the council commissions a review of its efficacy and value for money. 	<p>The council is in the process of reintroducing the Late Night Levy Board</p>
<ol style="list-style-type: none"> 2. We are encouraged to see reference to Agent of Change principles in the Licencing Policy. However, there are reasons why businesses both licenced and unlicenced in the borough need to make noise as part of their ongoing operations. 	<p>Noted</p>

<p>Noise complaints are received as a result of these legitimate activities and these can become repeated and vexatious. A fair process, guided by policy, should be developed to deal with such cases.</p>	
<p>3. We would suggest a sense-check is undertaken to investigate whether Low Traffic Neighbourhoods have impacted on licensees' ability to comply with Policy 20. We understand that in some cases, taxis in particular are unable to access some licenced premises, compelling patrons to walk to a main road for pick-up. This could have an impact on safety.</p>	<p>Paragraph 115 has been amended to include reference to Low traffic Neighbourhoods.</p>
<p>4. We would ideally like to see language in the policies that reflects the Council's commitment to ensuring the council is seen as a supportive environment for licensees.</p> <p>As an example, Policy 26 reads: "The Licensing Authority recognises that where gardens, tables and chairs outside are provided for smoking, drinking or eating, users can potentially cause a nuisance." It might instead read "The Licensing Authority recognises that where gardens, tables and chairs outside are provided for smoking, drinking or eating, users can potentially cause a nuisance. However, the Council supports where appropriate the use of outside tables and chairs to ensure the resilience of licenced businesses in the Borough."</p> <p>Outdoor tables and chairs have, particularly since the pandemic, become an integral part of operations for many Angel businesses and we would hope that the Council will continue to support their use as part of a vibrant public realm.</p>	<p>Licensing Policy 26 has been amended</p>
<p>5. Policy needs to come forward which strikes a balance between businesses that operate at night primarily for take away and those that operate licenses for food and alcohol to be consumed on the premises. Delivery personnel on motorbikes, in cars and on bicycles can gather in large numbers in sections of Upper</p>	<p>Thank you for the feedback and the council welcomes the offer to work with Angel.london on this issue.</p>

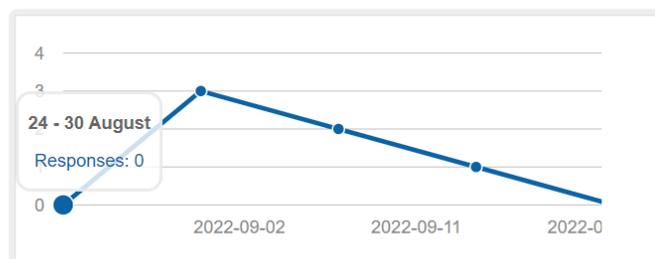
<p>Street and this can obstruct the operations of neighbouring businesses. We have ongoing concerns for the welfare of night-time workers who lack facilities, as well as the conflict that arises between businesses using different models. We would like to work with you on this.</p> <p>Angel is one of London's best-known neighbourhoods, known across the metropolis for its vibrant night-time economy. As the cost of doing business continues to rise, there is a real possibility that our night-time offer will become irreversibly damaged.</p> <p>The decision of Wetherspoons to put its Angel branch up for sale this week is evidence of this, but we have a growing list of hospitality businesses that have closed in the Angel due to cost pressures. For this reason, we seek a proportionate and sympathetic licencing environment from the Council and are committed to working with you to support this.</p>	
2. LBI Building Control	
<p>I would suggest that the criteria for issuing a license should include receipt of a building regulation completion certificate or final certificate. You may want to consult ourselves where an Approved Inspector has been engaged as the building control body.</p>	<p>Licensing Policy 2 has been amended to include 'receipt of a building regulation completion certificate or final certificate where appropriate'</p>
3. Councillor	
<p>We explicitly mention Ask Angela (Policy 21) and think we should also include 'Ask for Clive' and centralise LGBTQ+ safety in the policy</p> <p>Are there other vulnerable groups (ie those experiencing disabilities) whom we should explicitly reference to ensure we are promoting inclusivity in our premises?</p>	<p>Licensing Policy 21 and paragraph 118 amended as suggested.</p>

Part 2 Responses to Specific Consultation Feedback Questions

Activity



Responses



1. We have carried out a review of the success and need for our cumulative impact areas set out in policies 2,3 and 4. The evidence indicates they are still relevant.

Do you agree with the continuance of our cumulative impact areas in policy? | [View responses](#)

Yes	100.0%	<div style="width: 100%;"></div>	6
No	16.7%	<div style="width: 16.7%;"></div>	1
Any comments?	0.0%	<div style="width: 0%;"></div>	0
Total respondents			6

2. We have amended policy 6 covering opening hours to remove the special status given to Archway and Clerkenwell as their needs can be considered within the existing framework.

Do you agree? Required | [View responses](#)

Yes	100.0%	<div style="width: 100%;"></div>	6
No	0.0%	<div style="width: 0%;"></div>	0
Any comments?	0.0%	<div style="width: 0%;"></div>	0
Total respondents			6
Respondents who skipped this question			0

3. We have amended policies 7 and 8 to update the standards of management we expect from licensees.

Do you agree with our proposal? | [View responses](#)

Yes	80.0%		4
No	20.0%		1
Any comments?	0.0%		0
Total respondents			5
Respondents who skipped this question			1

4. We have added policy 9 to encourage applicants to include in applications how they will support equality and diversity.

Do you agree with the inclusion of this new policy area? | [View responses](#)

Yes	83.3%		5
No	16.7%		1
Any comments?	16.7%		1
Total respondents			6
Respondents who skipped this question			0

Comment 1 This has no relation to licensing and the council is trying to force their policies on businesses.

5. We have updated policy 21 to reflect the changes in the approach we as a licensing authority have adopted to secure the safeguarding of young adults, women, and vulnerable people.

Do you agree with our proposals? | [View responses](#)

Yes	83.3%		5
No	16.7%		1
Any comments?	16.7%		1
Total respondents			6
Respondents who skipped this question			0

Comment 1. Putting more red tape doesn't help businesses, young adults etc. More police is needed and councils to reduce their costs by putting more resources into this

6. Since the last policy was adopted, the practice of delivering food and alcohol from licensed businesses has increased substantially. We have amended policies 22 and 25 to reflect the need for businesses to take account of the nuisance this activity can cause.

Do you agree with our proposals? | [View responses](#)

Yes	83.3%		5
No	16.7%		1
Any comments?	0.0%		0
Total respondents			6
Respondents who skipped this question			0

7. The use of outside areas by licensed businesses has increased and it has been made easier to obtain a license on public land. Policy 26 has been amended to reflect this change and the measure we expect businesses to put in place to manage the use.

Do you agree with our proposals? | [View responses](#)

Yes	83.3%		5
No	16.7%		1
Any comments?	16.7%		1
Total respondents			6
Respondents who skipped this question			0

Comment: Local conservation areas mandate like-for-like (thin) glazing, which lets more noise than possible. Also with next policy in mind, prohibiting high standard insulation in surrounding buildings is counterproductive. Conservation rules should be amended.

8. The council has declared a climate emergency and aims to make Islington a net zero carbon zone by 2030. Policy 27 has been added to set out how businesses might support this ambition.

Do you agree with the inclusion of this policy? s? | [View responses](#)

Yes	66.7%		4
No	33.3%		2
Any comments?	33.3%		2
Total respondents			6
Respondents who skipped this question			0

Comments

1. This should also be applied to all council vehicles being low to zero carbon . Also Councils to look at how they operate their LTN's by not imposing them to the detriment of pushing vehicles to fewer roads thereby causing more pollution.

2. The wider policy of free evening parking is at odds with this. It encourages drunk driving and the road layout (in eg. Upper Street) makes cycling along these intermittently parked cars extra dangerous. This makes the policy incoherent. More needs to be done to support night time car reduction.

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The Licensing Policy review, lead by the Licensing Committee and Executive Member for Community Safety, and subsequent public consultation has lead to the following changes:

Amended Policy Statements

Licensing Policy 6 Licensing Hours

When dealing with new and variation applications the Licensing Authority will give more favourable consideration to applications with the opening and closing times listed in the table below:

Public Houses and Bars	Sunday to Thursday	8am to 11pm
	Friday and Saturday	8am to midnight
Nightclubs	Sunday to Thursday	8am to 1am the following day
	Friday and Saturday	8am to 2am the following day
Restaurants Cafes & Coffee Shops	Sunday to Thursday	8am to 11pm
	Friday and Saturday	8am to midnight
Hot food and drink supplied by takeaways & fast food premises	Sunday to Thursdays	11pm to midnight
	Friday and Saturday	11pm to 1am the following morning
Off Licences	Monday to Sundays	8am to 11pm
Hotels - residents only	Monday to Sundays	24 hours sale of alcohol
Hotels- guests and non-residents	Sunday to Thursdays	8am to 11pm
	Friday and Saturday	8am to midnight
Premises selling alcohol for consumption off the premises in close proximity to or in high risk areas	Monday to Sunday	10am to 11pm

Licensing Policy 8 Management Standards

When assessing the applicant or licensee's ability to demonstrate a commitment to high standards of management the Licensing Authority will take into account whether the applicant or licensee:

- can demonstrate comprehensive knowledge of best practice
- has sought advice from the responsible authorities
- has implemented any advice given by the responsible authorities
- is able to understand verbal and written advice and legal requirements
- can demonstrate knowledge of the licensing objectives, relevant parts of the Licensing Policy and their responsibilities under the Licensing Act 2003
- is able to run their businesses lawfully and in accordance with good business practices
- can demonstrate a track record of compliance with legal requirements
- can explain how they will brief staff on crime scene preservation

Where there is a history of non-compliance associated with the management of the premises the Licensing Authority is unlikely to grant a new or variation application or permit premises to continue to operate without further restrictions on review, unless there is evidence of significant improvement in management standards.

Licensing Policy 21 Safe and Secure Licensed Venues

In determining applications for pubs, clubs and bars the Licensing Authority will expect the applicant to explain its approach to creating a safe and secure environment for everyone, including adoption of schemes supporting safeguarding of women, LGBTQ+ and vulnerable customers and the protection of young adults in licensed venues.

Paragraph 122 Updated:

- Promoting 'Ask Angela'
- Promoting 'Ask Clive'
- Signing up to the Women's Night Safety Charter
- Signing up to 'Good Night Out'
- Signing up to be a "Safe Haven"
- Displaying posters which discourage harassment and hate crime and encourage reporting to staff/managers
- Taking every report seriously with appropriate action
- Taking steps to support people who report sexual harassment, assault and drink spiking
- Training and supporting staff to implement venue policies
- ensure vulnerable customers leave the venue safely
- Use ID scanners at venues

- Conduct risk assessments for each externally promoted event. Consideration to be given to linking in with Safer Sounds through the 'Safer Business Network'. <https://www.saferounds.org.uk>
- Adopt a Standard Operating Procedure (SOP) for every medical emergency that requires an ambulance to be called to the venue.

Licensing Policy 22 – Public Nuisance

The Licensing Authority is committed to preventing public nuisance by protecting the amenity of residents and businesses in the vicinity of licensed premises. Applicants and premises licence holders are expected to address these issues in their operating schedules.

Where relevant representations are received, the Licensing Authority will impose appropriate restrictions or controls on the licence to support the prevention of public nuisance due to:

- amplified sound: noise from music/films etc. played on the premises and or in external areas.
- deliveries from the premises: particularly early morning and late night and with a focus on delivery vehicle noise including idling engines and noise from delivery riders/drivers.
- deliveries to the premises: particularly early morning and late night, weekends and bank holidays deliveries, including idling vehicles
- flyposting: unauthorised posting of posters / advertisements etc.
- highways and pavement obstructions: obstruction by customers blocking footpaths when eating, drinking and smoking near to the premises or by furniture/signs etc.
- light pollution: unshielded lighting, lighting directed at neighbouring properties, excessive lighting
- litter and waste: litter and waste generated by the carrying out of licensable activities, for example, food wrappers and cigarette butts.
- noise from patrons: for instance:
 - patrons queuing to enter the premises.
 - patrons eating, drinking or smoking in external areas.
 - patrons dispersing from the premises late at night.
 - car horns/car radios/slamming of car doors late at night.
 - general drunken behaviour and shouting etc.

- odour, smells and smoke: smell nuisance from ventilation ducting and kitchen extractors. Also, smoke from wood and charcoal equipment etc.
- plant and machinery noise: including air conditioning units, refrigeration units and kitchen extractors etc.
- street fouling and urinating in public: urination and the fouling of pavements and doorways through vomiting etc.
- waste and other collections: particularly early morning and late night, weekends and bank holidays, clearing up and collection of waste and particularly of glass.
- recycling facilities: storage of waste such as glass and bottles etc.

Licensing Policy 25 Noise Relating To Deliveries From The Premises

Licence holders and applicants are encouraged to consider whether quiet deliveries can be made to customers' premises when delivering licensable goods or conducting late night deliveries. Noise from delivery vehicles is a large source of complaints and could potentially result in a public nuisance.

Licence holders and applicants need to introduce measures to minimise the impact, particularly of vehicle noise. The Licensing Authority recognises that deliveries from the licensed premises can sometimes be outside the control of the premises licence holder but encourages the appointment of contractors who can carry out collections and deliveries using non-internal combustion engine vehicles.

Whilst each premises is different and unique, there are several sources of noise and nuisance noise complaints that are common to many premises with a delivery service. Any operating schedule for a premises with a delivery service should address potential nuisances such as:

- Noise from delivery vehicles
- Noise from drivers/riders awaiting pickup
- Noise from the delivery

All proposals for a delivery from the premises service are required show that 'quiet' vehicles (such as electric vehicles and bicycles, cargo bikes etc.) will be used unless there are exceptional reasons why this is not possible. Applicants will be asked to justify why they would be unable to use quiet vehicles and produce a plan for their introduction.

Licensing Policy 26 Smoking, Drinking And Eating Outside

The Licensing Authority recognises that where gardens, tables and chairs outside are provided for smoking, drinking or eating, users can potentially cause a nuisance. However, the Council supports, where appropriate, the use of outside tables and chairs to ensure the resilience of licenced businesses in the Borough

Where smoking, eating and drinking takes place outside the Licensing Authority expects applicants to provide comprehensive details in their operating schedule on:

- the location of outside areas to be available for use
- how the outside areas will be managed to prevent:
 - noise
 - smell
 - light pollution
 - pavement obstructions
- the arrangements for clearing, tables and chairs
- preventing nuisance from smoke fumes to residents living in close proximity to smoking areas

Where the Licensing Authority receives representations or a review application regarding the use of an outside area it will impose restrictions or conditions that are appropriate for preventing a public nuisance.

NEW POLICIES

Licensing Policy 9 Equality And Inclusion In Licensed Premises

Applicants are encouraged to provide evidence as to how they will promote equality and diversity. Where relevant and appropriate, the licensing authority will take such evidence into account and give it due weight in the licensing processes

Islington has a diverse resident and visitor population and that is reflected in the wide range of successful licensed business in the area, offering multi-cultural food and entertainment and accessible venues. In our role as the licensing authority, we aim to encourage applicants to promote diversity, accessibility and including to provision of accessible facilities such as community toilets, whilst fulfilling their legal obligations under the Equality legislation.

In certain cases, the requirement to promote equality and diversity will directly engage the licensing objectives. In others, an applicant's evidenced commitment to promoting equality and diversity may signify a high standard of corporate social responsibility. This may help to demonstrate that they can also be trusted to promote the licensing objectives. As such, applicants are encouraged to provide evidence as to how they will promote equality and diversity. Where relevant and appropriate, the licensing authority will take such evidence into account and give due weight in the licensing process.

Licensing Policy 28 Environmental Best Practice In Licensed Premises

Applicants are encouraged to provide evidence as to how they will promote environmental protection.

Islington has declared a climate emergency and is working to make Islington net zero in terms of carbon by 2030.

Licensees are encouraged to join the council in working towards net zero carbon by considering:

- Reducing energy usage and switching to green energy suppliers
- Reducing food wastage and train staff in good practices
- When choosing takeout and delivery containers, opt for compostable materials where possible
- Focusing on reducing all types of waste and recycling where possible
- Reducing use of vehicles and switching to bikes or electric vehicles where they continue to be needed
- Supporting staff and customers who cycle to the licensed premises
- Inform customers about the actions being taken
- Buying from other businesses who are taking action to reduce their carbon footprint, including buying more locally.

In certain cases, the applicant's commitment to environmental protection will directly engage the licensing objectives. In others, an applicant's evidenced commitment may signify a high standard of corporate social responsibility. This may help to demonstrate that they can also be trusted to promote the licensing objectives. As such, applicants are encouraged to provide evidence as to how they will promote environmental protection. Where relevant and appropriate, the licensing authority will take such evidence into account and give due weight.

New Paragraph 122 (drink spiking)

Where appropriate premises applicants should consider the risk of drink spiking and have policies and procedures in place to prevent spiking and provide welfare support for customers who report that they have been the victim of spiking. Measures will include:

- Acting upon all reports, and alleged reports, of spiking, recording details and reporting to the police.
- Providing appropriate health, safety and welfare for customers
- Training staff and security teams on procedures

- Having procedures in place for searching, checking toilets and chillout and other quiet spaces
- Good CCTV coverage throughout the premises

New Paragraph 100 (Licensees' Charter)

The Licensee's Charter is designed to create venues that are safe and secure for customers whilst respecting the rights of residents living nearby. The Licensing Authority is keen to for all licence premises to support the charter and commit to:

- a. Providing safe, secure inclusive venues and premises
- b. Respecting local neighbours and encouraging customers to do likewise
- c. Providing high standards of management both inside and outside the premises
- d. Investing in staff training to support the Charter' objectives

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Environment Directorate
Public Protection and Regulatory Services
222 Upper St
London N1 1RE

Report of: Service Director – Public Protection and Regulatory Services

Meeting of: Licensing Committee

Date: 17 November 2022

Ward(s): All

Subject: Gambling Premises Licensing Policy 2023-2026

1. Synopsis

- 1.1. Under the Gambling Act 2005, the Council is required to publish every three years a Gambling Premises Licensing Policy explaining out how it will regulate premises used for gambling in the borough every three years.
- 1.2. The current policy has been reviewed and updated with greater emphasis being placed on protecting vulnerable people from gambling related harm. The revised policy was subject to public consultation starting on 18 August 2022 and completing on 4 October 2022.
- 1.3. The proposed three-year policy is attached as appendix A.
- 1.4. At the same time as adopting the Gambling Policy the Council will need to renew its resolution, first made in 2007, to not issue any casino licences in the next three years.
- 1.5. The approval of the Gambling Premises Licensing Policy can only be exercised by full Council.
- 1.6.

2. Recommendations

- 2.1. To note and confirm the following recommendations to council:
- The results of the consultation feedback as detailed in Appendix B
 - The council's response to the consultation, in particular the proposed revisions to the policy, as described in Appendix B and section 3.9 below
 - Renew the resolution of the Council not to issue any casino licences in the period 2023-2025
 - Adopt the Gambling Premises Licensing Policy 2023-2025 for Islington, attached in Appendix A.
 - Agree that the Policy shall apply to all applications for a premises licence or club certificate submitted after 1 January 2023

3. Background

- 3.1. The regulation of gambling activities is shared with the Gambling Commission, with Local Authorities being responsible for licensing premises used for licenced gambling activities and small-scale lotteries, and the Gambling Commission taking responsibility for all other matters including licensing gambling operators, setting maximum stakes, online gambling, and providing statutory guidance and standards.
- 3.2. The table below shows the types of premises used for gambling and the number of current licences and permits issued by the council.

Type of premises	Number
Casinos	0
Bingo	0
Betting Tracks (Emirates)	1
Betting shops	32
Adult Gaming Centres (Arcades for 18 and over)	7
Family Entertainment Centres (Arcades that permit children to enter).	0
Club Gaming Permits	2

Pubs with permits to provide more than 2 gaming machines.	22
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- 3.3. The purpose of the Gambling Premises Licensing Policy is to explain to businesses and residents how the council intends to regulate premises using for gambling and our approach to dealing with applications for new gambling premises licences.
- 3.4. As a Licensing Authority the council is required to have regard to the following licensing objectives:
- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - Ensuring gambling is conducted in fair and open way
 - Protecting children and other vulnerable people from harm or from being exploited by gambling Licensing authority discretion
- 3.5 The Gambling Act 2005 requires councils to ‘aim to permit’ licenced gambling premises however there is now widespread recognition that gambling can be harmful and have significant impacts on household disposable income, mental and physical health. As a result, the statutory guidance issued by the Gambling Commission allows councils to consider local area profiles and risk assessments when making decision about new applications.

Gambling Premises Licensing Policy Review

- 3.5. The review process has been led by the Executive Member for Community Safety and the Chair of Licensing Committee and Members of the Licensing Committee.

During the process the council has consulted with:

- The Police
- Public Health
- Trading Standards
- Community Safety
- Existing gambling premises licence holders
- Organisations representing gambling operators
- Organisations representing people who gambling
- Organisations working to reduce gambling related harm

Consultation Responses

- 3.6. The statutory consultation and resident engagement programme ran from 18 August 2022 to 4 October 2022. The council received 7 detailed responses from:
- Two Councillors

- Combined Feedback from Executive Member for Community Safety, the Chair and Members of the Licensing Committee
- Planning and Development Control
- Paddy Powers – Bookmaker
- The Merkur Group – gambling operators providing bingo, casinos, adult gaming centres and family entertainment centres
- Betnomore – a charity based in Islington with a mission is to reduce gambling harms.

Consultation Feedback

- 3.7. Whilst the responses where detailed the emerging themes were:
- Realigning the draft policy to reflect the council’s statutory duties as a licensing authority, the guidance to local authorities issued by the Gambling Commission and removing sections duplicating legal requirements
 - Recognising the gambling operators commitment to comply with responsible gambling policies and procedures approved by the Gambling Commission
 - Feedback on the council’s approach to risk assessment, evidence-based harm and risks associated with gambling
 - The role of the Local Plan
 - Using academic research to understand the risk of gambling related harm
 - Suggesting measures that could be implemented to mitigate against the risk of vulnerable people experiencing gambling related harm
- 3.8. The detailed consultation feedback and the council’s response to the consultation is attached as appendix B

Revised Gambling Premises Licensing Policy

- 3.9. Consultation feedback has resulted in several key changes to the draft Policy:
- All paragraphs that duplicate the Act and Guidance have been removed, sections and paragraphs have been reordered.
 - Islington Together priorities and principles have been included the in the Policy (pages 3-4)
 - A new Part 3 explaining the council’s approach to promoting the licensing objective to protect vulnerable people from gambling related harm (pages 10-12)
 - Using data and the Gambling Risk Index Model to identify Gambling Vulnerability Zones (map page 18)
 - Reaffirming that each application will be considered on its merits but, in areas where a new application could result in saturation, the creation of gambling premises clusters or increase the risk of vulnerable people being harmed by gambling, the council will consider refusal of the application unless the

applicant is able to comprehensively demonstrate, through proven evidence-based policies and procedures, that vulnerable persons will not be harmed by the proposed gambling activities. (page 12)

3.10. **No Casino Policy**

3.11. The consultation to seek view on the continuation of the 'no casino policy' for a further 3 years received no objections from residents, businesses and stakeholders.

4. Implications

4.1 **Financial Implications**

4.1.1 The cost associated with policy development and consultation will be met from existing budgets

4.2 **Legal Implications**

4.2.1 Section 349 of the Gambling Act 2005 requires licensing authorities to prepare and publish a gambling policy every three years. The licensing authority may review and alter their statement of policy at any time during the three-year timeframe.

4.2.2 The gambling policy must be produced following consultation and where the policy is reviewed and changes proposed, licensing authorities must consult on any revision.

4.2.3 The Gambling Act 2005 requires that any resolution not to issue casino licences must be published in the licensing authority's gambling policy. The policy should state how the authority has taken this decision.

4.2.4 The approval of the gambling policy can only be exercised by full Council.

4.3 **Environmental Implications and contribution to achieving a net zero carbon Islington by 2030**

4.3.1 There are no negative environmental impacts arising from the adoption of a Gambling Policy and the 'no casino' resolution

4.4 **Equalities Impact Assessment**

4.4.1 The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

4.4.2 An Equalities Impact Assessment is not required in relation to this report, because the Equalities Impact Assessment Screening Tool indicated that the Gambling Premises Licensing Policy and the No Casino Policy will have a positive impact on people with identified protected characteristics.

5. Conclusion and reasons for recommendations

- 5.1. The council is required to review and adopted its Gambling Premises Licensing Policy every 3 years. The current policy has been reviewed and a revised draft policy has been the subject of a consultation exercise. The Council is now invited to adopt the Gambling Premises Licensing Policy 2023-2025.
- 5.2. The council is required to renew its no casino policy every three years, and publish its resolution

Appendices:

- A Proposed Gambling Premises Licensing Policy 2023-2025
- B Consultation Feedback LBI Response

Background papers:

- None

Final report clearance:

Signed by:



Besserat Atsebaha

Service Director Public Protection and Regulatory Services

Date: 8th November 2022

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Gambling Premises Licensing Policy 2023-2026

Statement of Principles

Gambling Act 2005

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PART 1 - Introduction

Islington in Context

Islington is one of London's smallest councils, covering just over six square miles. It is the fifty-third most deprived council in the country, and sixth most deprived in London. Islington also ranks the third highest authority in the country for the proportion of children living in household's dependent on benefits and 35% of children under the age of 16 live in low income households. The general unemployment rate and the proportion of Islington residents on out-of-work benefits is significantly higher than the national average.

Islington Together

Islington is a borough of great strengths: thriving businesses; excellent transport links; outstanding services; and most importantly a rich and wonderful diversity of people, cultures, and communities. But despite these strengths too many of our people are in danger of being left behind. Poverty, mental ill-health and anxiety about the future, lack of access to good jobs, poor air quality and housing conditions, prejudice, racism, and injustice hold too many people back, depriving them of opportunities and choices and the autonomy to shape their lives in the way they want.

Our mission for the next decade is to work alongside our colleagues, partners, and communities to realise our shared goals create a more equal Islington, where everyone who lives here has an equal chance to thrive.

Our priorities for achieving a more equal future are:

- Children and young people have the best start
- Local jobs and businesses in a thriving local economy
- Everyone has a place to call home Cleaner, greener, healthier borough
- Communities feel safe, connected and inclusive

Our principles that will shape our approach are:

- Standing up to and challenging inequality
- Work in partnership with our communities
- Committing to early intervention and prevention
- Embrace change and innovation
- Driven by improving outcomes for resident

Purpose and Scope

The aims of the Statement of Licensing Principles are to:

- inform licence applicants how this Authority will make licensing decisions and how licensed premises are likely to be able to operate within its area

- set out how the Authority intends to support responsible operators and take effective actions against irresponsible operators
- inform residents, business and licensed premises users, the protections afforded to the local community within the Act and by this Authority
- support the Authority in making licensing decisions

Licensing objectives

The council, acting as the Licensing Authority under the Gambling Act 2005, must have regard to the following licensing objectives:

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

Licensing Authority Functions

The council is responsible for:

- licensing the following types of premises:
 - Casinos
 - Bingo
 - Betting Tracks
 - Betting shops
 - Adult Gaming Centres (Arcades for 18 and over)
 - Family Entertainment Centres (Arcades that permit children to enter).
- considering notices for the temporary use of premises for gambling
- granting permits for gaming and gaming machines in clubs
- regulating gaming and gaming machines in alcohol licensed premises
- granting permits for family entertainment centres with lower stake gaming machines
- granting permits for prize gaming
- considering occasional use notices for betting at tracks
- registering small lotteries
- tackling illegal gambling activity
- monitoring compliance and taking enforcement action when required
- publishing a statement of licensing principles

Role of the Gambling Commission

The Gambling Commission is responsible for:

- issuing operating licences to organisations and individuals who provide facilities for gambling
- issuing personal licences to persons working in the gambling industry
- taking the lead role on ensuring that gambling is conducted in a fair and open way through the administration and enforcement of operating and personal licence requirements

- remote gambling activities such as facilities provided via the Internet, television, or radio
- issuing guidance and statutory codes of practice

General Approach to Applications

The council is expected to aim to permit the use of premises for gambling in accordance with the requirements of the Act and when making decisions about gambling matters consider:

- the licensing objectives
- any relevant code of practice or guidance issued by the Gambling Commission
- the authority's statement of licensing principles
- the need to avoid duplicating other regulatory regimes
- the right of any person to make an application under the Act
- the Local Area Profile
- the premises own Local Risk Assessment

The council will decide each application on its merits and applicants will be given the opportunity to demonstrate how their application promotes the licensing objectives and addresses the relevant sections of statement of principles.

Part 2 – Specific Requirements

Gambling Premises Licence Applications

When considering applications for new gambling licences, variations to existing licences and licences reviews the council will consider the matters listed below. This is not an exhaustive list and there may be other factors which may arise that could be considered relevant. The council will consider the relevance of any additional factors raised on a case-by-case basis.

- the location of the premises
- the Local Area Profile
- the Local Risk Assessment
- the views of responsible authorities
- the views of interested parties
- compliance history of current management
- the hours of operation
- the type of premises
- whether the applicant can demonstrate high levels of management
- the physical suitability of the premises
- the levels of crime and disorder in the area
- the level of deprivation and ill health in the area
- whether the application will create or increase the size of a cluster of gambling premises in a Gambling Vulnerability Zone

The location of the premises will be an important factor as it can impact on all three of the licensing objectives. The council will consider very carefully applications for premises licences that are near sensitive premises such as:

- schools
- parks
- stations, other transport hubs and places where large numbers of school children might be expected
- other premises licensed for gambling
- premises licensed for alcohol
- children's and vulnerable persons' centres and accommodation
- youth and community centres
- health and treatment centres
- leisure centres used for sporting and similar activities by young persons and/or vulnerable persons
- religious centres and public places of worship
- pawn brokers and cash converters
- pay day loan shops
- banks and ATMs
- fast food outlets

Management Standards

The Council seeks to encourage the highest standards of management in premises used for gambling and for applicants and operators to demonstrate they have taken steps to prevent gambling from being a source of crime and disorder and to protect people from gambling related harm.

Management standards should include high-quality and regular training of all staff, the ability to recognise and address gambling harms and preventative measures targeted at all people, and not just those who are child, young or vulnerable.

Gambling premises should be adequately staffed by enough trained and competent staff who are able to serve and supervise the customers, identify, and prevent young people from gambling, prevent and address gambling related harms, deal with customers who may be consuming alcohol and prevent the premises being used as a source of crime and disorder.

In order to promote the licensing objectives and reduce the risk of staff working in gambling premises being subject to workplace violence and verbal abuse it is expected that there will be an adequate number of staff and managers on the premises to cover key points throughout the day. Applications for premises that will result in regular lone working are only likely to be approved in exceptional circumstances.

The council has produced a pool of model conditions in Appendix 2 to assist both new applicants and current operators. The list of measures in the document is not exhaustive but it

does give an indication of some of the suitable measures and procedures that that are expected of well managed premises.

Crime and Disorder

Licensees and applicants will be expected to demonstrate that they have given careful consideration to preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.

The measures to be considered should include:

- the arrangements in place to control access
- the opening hours
- the provision of registered door supervisors
- the provision of CCTV
- the number of staff on duty and effective staff training, especially in relation to lone working
- the provision of toilet facilities
- prevention of antisocial behaviour associated with the premises, such as street drinking, litter, activity outside the premises including the management of clients leaving the premises

Protecting Children from Harm

Licensees and applicants will be expected to demonstrate that they have given careful consideration to protecting children and vulnerable persons from harm and have adequate arrangements for preventing underage gambling on their premises

The measures to protect children from harm that should be considered where appropriate are:

- the provision of CCTV
- location of entrances
- supervision of entrances
- controlled access to the premises by children under the age of 18
- dealing with pupils who are truanting
- design layout/lighting/fit out to not attract children or vulnerable persons
- having a nationally recognised proof of age scheme – Think 21
- the provision of registered door supervisors
- clear segregation between gaming and non-gaming areas in premises frequented by children
- the provision of adequate signage and notices
- supervision of machine areas in premises to which children are admitted
- controlled opening hours
- effective self-barring schemes
- the provision of materials for GamCare, Betknowmore UK or similar, Citizens Advice Bureau information, local public and mental health and housing/homeless associations, printed in languages appropriate to the customer base.

- an effective staff training policy covering safeguarding

For multi-occupied premises consideration should also be given to the arrangements for controlling access to children and the compatibility of the activities of the occupants. In many cases separate and identifiable entrances may be required so that people do not drift inadvertently into a gambling area.

Children are only permitted to use Category D machines – low odds, coin shifters or garbbers - and in premises where other gaming machines are available and children are permitted on the premises the council will require:

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

Alcohol Licensed Premises Gaming Machine Permits

Premises licensed to sell alcohol that have a bar and the alcohol is not ancillary to food for consumption on the premises, with more than two gaming machines, will need to apply for a Gaming Machine Permit. Premises with one or two machines must submit a notification to the council.

The council expects applicants to:

- display adequate notices and signs, advertising the relevant age restrictions
- position machines within view of the bar for staff to be able to monitor the machines for use by underage or misuse of the machines
- challenge anyone suspected of being underage and refuse access
- provide information leaflets and / or help-line numbers for organisations such as GamCare and Betknowmore UK.

Prize Gaming Machine Permits

The council expects applicants to set out the types of gaming machines that they intend to offer and be able to demonstrate that:

- they understand the limits to stakes and prizes that are set out in regulations
- that the gaming offered is within the law

Development Planning

There is a clear and distinct difference between planning and licensing regimes, reinforced by section 210 Gambling Act 2005 which requires the council to have no regard to whether a premises is likely to be permitted under planning law when dealing with a gambling premises application.

Planning applications will be considered against relevant Local Plan policies, this includes policies which look at the concentration of such premises and their impacts. Gambling premises applications will be considered within the context of the Gambling Objectives and the Local Area Profile

Applicants for new gambling premises licences are advised to refer to the council's Local Plan:

[Retail, Leisure and Services, Culture and Visitor Accommodation \(islington.gov.uk\)](http://islington.gov.uk)

Notwithstanding this requirement the Council recommends that an applicant for a new gambling premises licence has the appropriate planning permission in place for the intended use, before making an application for a premises licence.

Split Premises

The council will always give the closest consideration to whether a sub-division has created separate premises meriting a separate machine entitlement. The Authority will not automatically grant a licence for sub-divided premises even if the mandatory conditions are met, particularly where the Authority considers that this has been done to sidestep controls on the number of machines which can be provided in a single premise. Applicants will be expected to demonstrate that there are exceptional reasons for granting the licence and the Authority will consider if the sub-division has undermined the licensing objective of protecting the vulnerable.

Opening Hours

The licensing authority expects all premises licence applications to specify opening hours.

Betting shops

The default conditions provide that betting premises are permitted to offer gambling facilities between 7am and 10pm. The council may decide to exclude the default conditions and only permit a betting premises to offer gambling facilities during reduced hours. Decisions will be made on a case-by-case basis where there is evidence to support the need for this to promote the licensing objectives.

Adult Gaming Centres

Particular attention will be paid to the opening hours for Adult Gaming Centres which do not have opening hours specified as part of their mandatory conditions. Applicants will be expected to set opening hours that promote the licensing objectives.

Enforcement

The Gambling Commission is responsible for enforcing requirements relating to Operator and Personal Licences and the manufacture, supply, or repair of gaming machines.

The Council and Police share enforcement responsibility for compliance with requirements relating to gambling in premises.

The Police will lead on significant crime and disorder issues associated with licensed premises and activities

The council will lead on general non-compliance with licence conditions, residents' complaints and issues that may involve other teams within the council associated with public safety, protecting children and vulnerable people from harm and public nuisance.

Any enforcement action will be consistent with the council's enforcement policy and the Regulators Code.

Illegal Gaming Machines

The council will take a robust approach to enforcement where there is evidence of gaming machines in premises that do not comply with the legal requirements including gaming machines that are

- located in prohibited places such as takeaways and minicab offices
- provided without an appropriate permit
- unclassified.

Casino Resolution

The Gambling Act allows licensing authorities to resolve not to issue casino premises licences. The council has consulted with residents and businesses to seek their views before deciding whether to make such a resolution. As a result of the consultation the council has resolved not to issue casino premises licences.

Part 3 Protecting Vulnerable People From Harm

The main opportunities to gamble in licensed premises in the borough are

- betting shops
- track betting on match days Emirates Stadium
- premises with Club gaming permits
- adult gaming centres (amusement arcades)
- pubs with permits to provide more than 2 gaming machines.

There are clusters of licensed gambling premises in Archway, Caledonian Road, Nags Head and Finsbury Park, these are all areas with high levels of multiple deprivation.

The council has serious concerns around the impact of any increase in the opportunity to gamble in the Borough and the effect it will have on its most vulnerable residents. Islington has significant numbers of residents with substance mis-use problems, poor mental health or who are living in deprivation and these groups are more vulnerable to gambling-related harm. The council recognises that the relationship between health and low income exists across almost all health indicators. Gambling harm can affect anyone and the council expects applicants to submit robust operating plans to indicate how it will prevent gambling related harm as well as early intervention measures to identify and support customers who are potentially at risk of developing gambling related harm.

A key determinant in making decisions about gambling premises applications will be the council's duty to promote the licensing objectives to protecting children and other vulnerable persons from being harmed or exploited by gambling. This is a far-reaching requirement and the council will interpret the definition of a vulnerable person to include anyone who gambles as being at risk of being harmed.

Whilst many people gamble without incurring harm. However, for some people the transition to being subject to gambling related harm can happen quickly with severe and negative impacts on themselves and people who are close to them

Vulnerable persons may include people who:

- gamble more than they want to
- who gamble beyond their means
- who may not be able to make informed or balanced decisions about gambling due to mental impairment, alcohol or drugs
- children and family members adversely impacted by the behaviour and financial loss associated with gambling
- are temporarily vulnerable due to life changing experiences, such as job loss, bereavement or relationship breakdown or moving away from home
- are homeless

Appendix 1 brings together data relevant to creating local area profiles for the borough in particular:

- the local area profile for gambling risk
- gambling related crime and disorder

The council views that any location with a Gambling Risk Index of 20 or above is a Gambling Vulnerability Zone. Applications for new gambling premises in these areas will expect applicants for new premises licences in this area to submit

- a comprehensive risk assessment that specifically addresses the risks
- put forward suitable and sufficient control measures, over and above what would normally be expected on a similar premises outside a Gambling Vulnerability Zone, to eliminate or mitigate those risks.

Whilst the council acknowledges that the Gambling Act 2005 expects Licensing Authorities to aim to permit premises being used for gambling activities the council will balance this

requirement alongside its responsibility to protect vulnerable people from gambling related harm. As a small, densely populated borough with high levels of deprivation the council will prioritise promotion of the licensing objectives by considering the cumulative effects, especially in Gambling Vulnerability Zones. Each application will be considered on its merits but, in areas where a new application could result in saturation, the creation of gambling premises clusters or increase the risk of vulnerable people being harmed by gambling, the council will consider refusal of the application unless the applicant is able to comprehensively demonstrate, through proven evidence-based policies and procedures, that vulnerable persons will not be harmed by the proposed gambling activities.

The council will carefully weigh all the available evidence when determining applications and is aware of evolving research which supports the promotion of the licensing objectives. Whilst the council is not responsible for regulating online gambling, research on gambling related harm associated with online gambling is relevant to mitigating or eliminating the risk of gambling related harm arising from licenced gambling premises. Evidence suggests that online gaming (casino, slot, bingo) are more popular in areas of greatest deprivation and the industry derives greatest gaming yield from these areas. The Patterns of Play reports, produced by the University of Liverpool and NatCen Social Research, indicate that:

- Nearly 40% of bingo players and nearly 35% of instant win players resided in the 20% of most deprived areas.
- For slots, casino games and poker, the corresponding proportions were 31%, 28% and 26%
- In terms of Gross Gambling Yield, 39% of bingo spend originated in the 20% most deprived areas and only 6% in the 20% least deprived areas
- For the other products, the corresponding figures were: slots (25% / 14%), casino (21% / 17%), poker (19% / 22%)¹

The council is also cognisant of research which suggests that online casino gambling generates a substantial proportion of expenditure from those at risk or harmed by gambling.² Furthermore, the report of the Commission on Crime and Problem Gambling, *Crime and Problem Gambling: A Research Landscape*, highlights links between disordered gambling and a wide variety of crime including theft, fraud, street robbery, domestic abuse and child neglect linked to problem and pathological gambling.³

Further Information

¹ https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final.pdf

² <https://www.tandfonline.com/doi/full/10.1080/14459795.2022.2088823>

³ <https://howardleague.org/wp-content/uploads/2020/05/Crime-and-problem-gambling-research-landscape.pdf>

If you want to discuss the Statement of Principles or if you want any further advice about regulating gambling in Islington, please contact:

Licensing Service

Public Protection Division
Islington Council
222 Upper Street
London N1 1XR
Tel: 020 7527 3031
Web: www.islington.gov.uk
Email: licensing@islington.gov.uk

References

As well as referring to the requirements of the Gambling Act 2005 and statutory guidance and codes of practice issued by the Gambling Commission the council has referred to a number of other publications to formulate its approach to fulfilling its duties under the Act, in particular the promotion of the licensing objectives. These publications include:

[Tackling gambling related harm – a whole council approach | Local Government Association](#)

[Gambling and Public Health.pdf \(londoncouncils.gov.uk\)](#)

[Retail, Leisure and Services, Culture and Visitor Accommodation \(islington.gov.uk\)](#)

[National Strategy to Reduce Gambling Harms \(gamblingcommission.gov.uk\)](#)

[A public health approach to gambling regulation: countering powerful influences - The Lancet Public Health](#)

[\(PDF\) Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index \(researchgate.net\)](#)

[Gambling regulation: problem gambling and protecting vulnerable people \(parliament.uk\)](#)

[Gambling regulation problem gambling and protecting vulnerable people \(nao.org.uk\)](#)

[LCCP Section - Gambling Commission](#)

[Reducing Gambling Harms resources - Gambling Commission](#)

[The Howard League | Crime and problem gambling: A research landscape](#)

[Gambling Risk Index|Geofutures MapCase](#)

[Mapping risk to gambling problems: a spatial analysis of two regions in England: Addiction Research & Theory: Vol 25, No 6 \(tandfonline.com\)](#)

Exploring Patterns of Play [Presentation headline here \(begambleaware.org\)](#)

[Full article: Is the economic model of gambling dependent on problem gambling? Evidence from an online survey of regular sports bettors in Britain \(tandfonline.com\)](#)

[Cost of living crisis could lead to worrying growth in gambling harms among women | BeGambleAware](#)

Protecting children and vulnerable people from harm

The Licensing Authority recognises that gambling is increasingly recognised as a public health issue. Individuals can experience significant harm as a result of their gambling. Problem gambling is defined as gambling that is disruptive or damaging to you or your family or interferes with your daily life⁽¹⁾ whereas **gambling related harm** is the impact of problem gambling which may affect others as well as the person gambling.

1. The Government estimates that 0.5% of the population are considered problem gamblers, and a further 3.8% of the population are classified as at-risk gamblers
2. Gamble Aware data shows that Islington is in the quintile with the highest prevalence of problem gambling (Problem Gambling Severity Index of 8 or more out of 10) in the country, but in the third lowest quintile for relative demand and usage of support mechanisms such as counselling CBT, support groups or residential rehabilitation)
3. Harmful gambling has a different activity profile to general gambling. It includes low National Lottery participation and high participation in online gambling (including online slots), casino and bingo games, electronic gambling machines in bookmakers, sports and other event betting, betting exchanges and dog racing. Harmful gamblers are far more likely to participate in 7 or more gambling activities.
4. Around 7% of the population of Great Britain (adults and children) were found to be negatively affected by someone else's gambling.
5. Certain people are more vulnerable to gambling-related harm, including those with substance misuse problems, poor mental health, those living in deprived areas, and children and young people. Problem gamblers are more likely than other people to experience the following harms:
6. **Financial harms:** overdue utility bills; borrowing from family friends and loan sharks; debts; pawning or selling possessions; eviction or repossession; defaults; committing illegal acts like fraud, theft, embezzlement to finance gambling; bankruptcy; etc.
7. **Family harms:** preoccupied with gambling so normal family life becomes difficult; increased arguments over money and debts; emotional and physical abuse, neglect and violence towards spouse/partner and/or children; relationship problems and separation/divorce.
8. **Health harms:** low self-esteem; stress-related disorders; anxious, worried or mood swings; poor sleep and appetite; substance misuse; depression, suicidal ideas and attempts; etc.
9. **School/college/work harms:** poor school, college or work performance; increased absenteeism; expulsion or dismissal.

10. The risk of harm from gambling varies across Islington. The Gambling Risk Index is a model that includes local data on evidence-based risk factors for problem gambling. The model includes the numbers of young people, those from minority ethnic groups, the unemployed, residents with certain mental health diagnoses, the location of substance misuse treatment centres, food banks, homelessness shelters, educational establishments and payday loan shops. The model was created by Heather Wardle and colleagues at Geofutures.
11. The map on the next page shows the Gambling Risk Index for Islington and the location of betting shops and gaming premises.

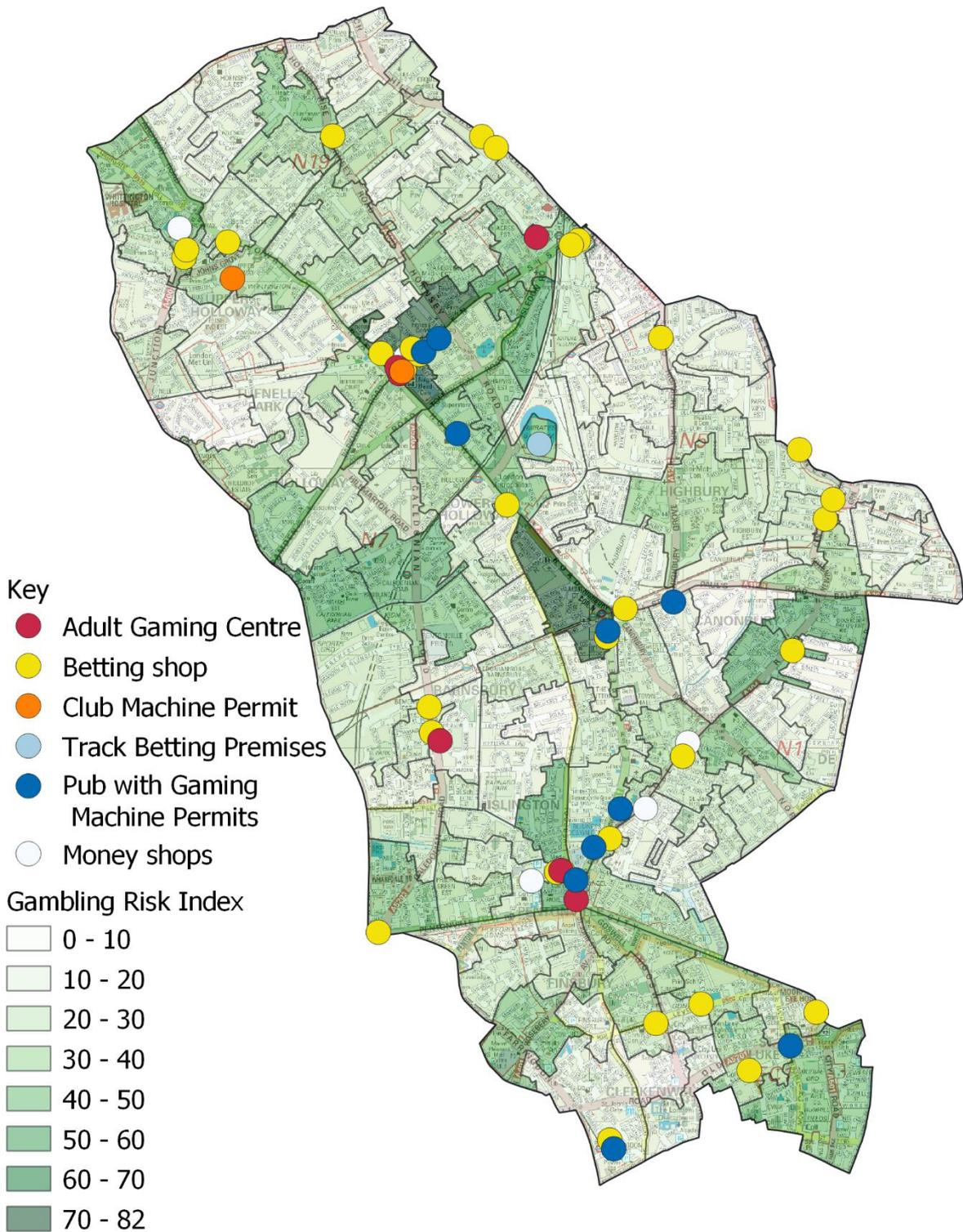
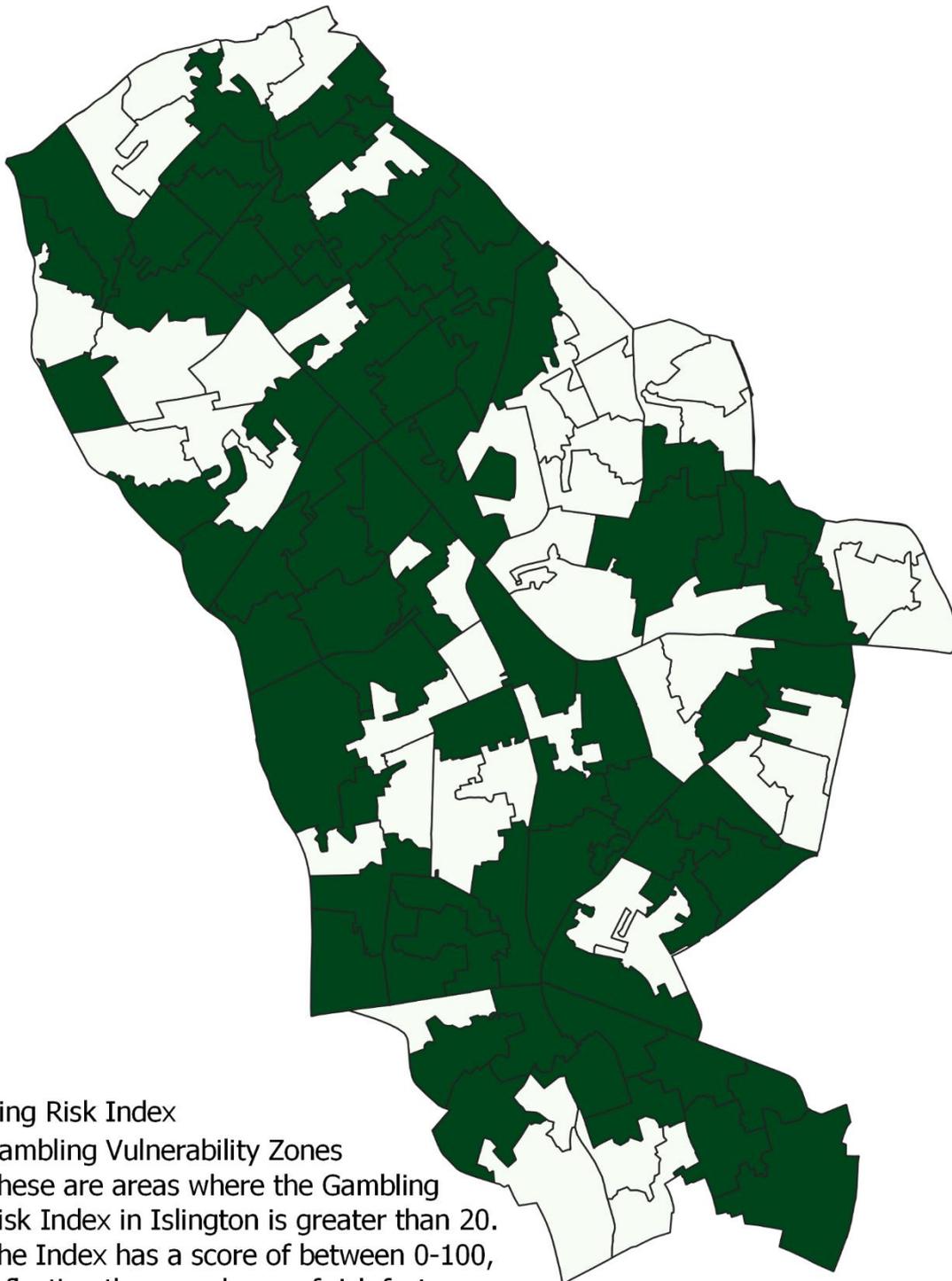


Diagram 1 – Gambling Risk Index with an overlay showing the location of gambling premises and money shops



Gambling Risk Index

■ **Gambling Vulnerability Zones**
These are areas where the Gambling Risk Index in Islington is greater than 20. The Index has a score of between 0-100, reflecting the prevalence of risk factors that make people vulnerable to gambling harm.

Diagram 2 – Gambling Vulnerability Zones

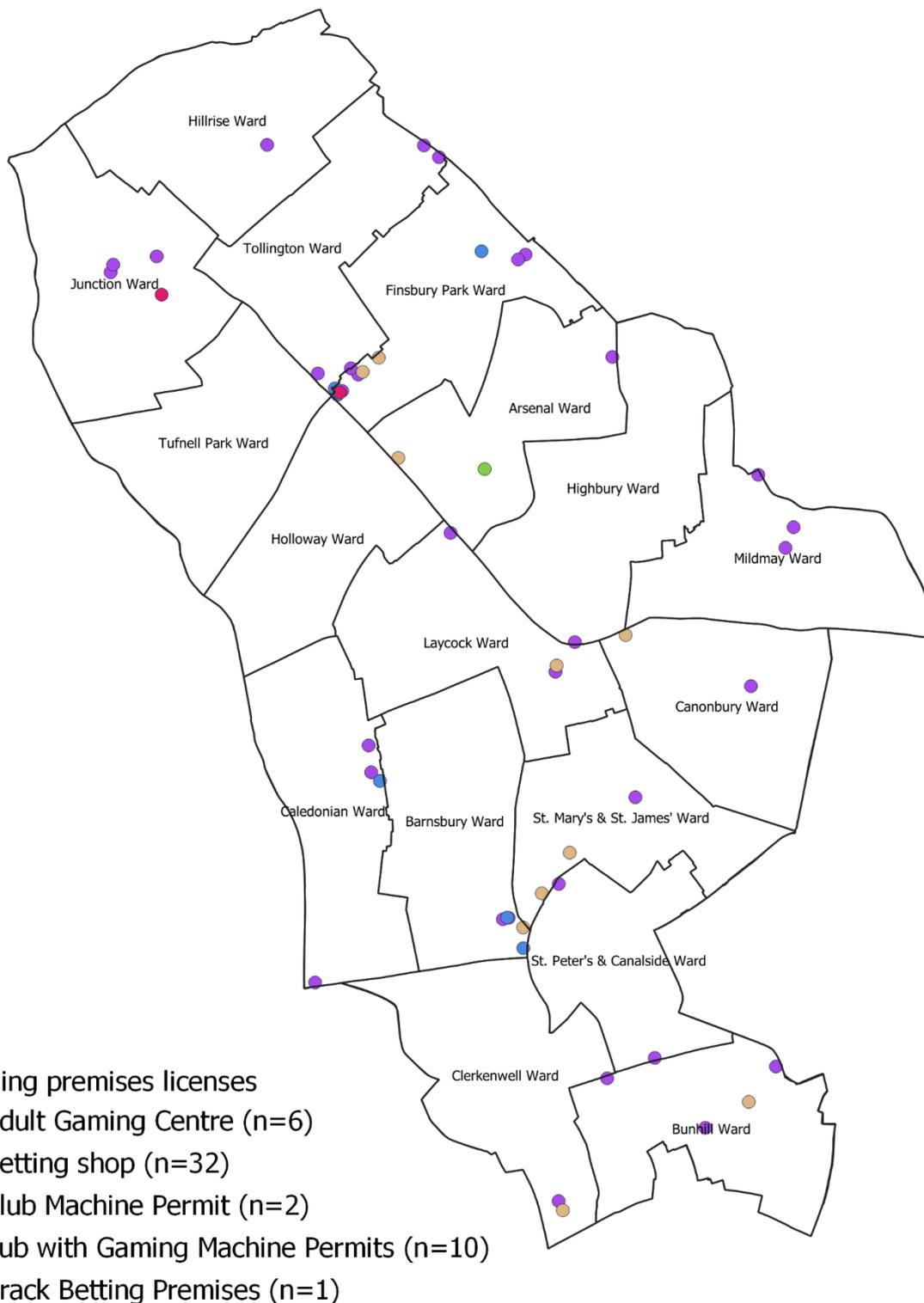


Diagram 3 Diagram showing cluster location of gambling premises by ward

Crime and disorder

12. The crime and disorder data analysed in this section, based on reported crime and disorder, provide an indication of patterns and hotspots. The number of actual crimes and incidents of anti-social behaviour in and around gambling premises maybe higher than those reported.
13. The Police crime data in the table below was taken from a CRIS Business Intelligence tool search using location type as 'betting shop' or amusement arcade'. Due to inconsistent recording, the address was also searched for the main betting shops as well. The data included offences where the address was recorded as outside of the premises.
14. Analysis is based on a 36-month period between 1 January 2019 and 31 December 2021
15. Based on a borough comparison of total betting shop crime over the most recent 12-month period, Islington was ranked 11th out of 32 London Boroughs (excludes City of London).
16. Table A shows there have been reductions in crime attached to betting shops over the past three years, across all major crime categories. This can be mainly attributed to Covid lockdowns where crime nationally reduced and betting shops had periods of closure. There has also been a reduction in betting shops in Islington.

Table A: Crime Category	Total Crime (Betting Shop)		
	2019	2020	2021
Criminal Damage	39	10	7
Robbery	7	8	3
Theft and Handling	32	17	6
Violence Against the Person	49	35	29
Other Crime Type	13	6	4
Total	140	76	49

17. Table B shows that over the past three years, the most common crime type was 'harassment', accounting for 22% of all offences. This is mainly in relation to public order offences and customers threatening staff and other customers. This is followed by 'other criminal damage' – damaging equipment in the betting shop (accounting for 18% of all offences). The third highest crime type is 'Common Assault', accounting for 14% of all offences.

Table B: Crime Type	Total Crime (1 Jan 2019 - 31 Dec 2021) (Betting Shop)	
	Total Offences	Proportion of Total
Criminal Damage	56	21%
Other Criminal Damage Categories	7	3%
Other Criminal Damage	49	18%
Robbery	18	7%
Business Property	2	1%
Personal Property	16	6%
Theft and Handling	55	21%
Other Theft categories	12	5%
Other Theft	25	9%
Other Theft Person	18	7%
Violence Against the Person	113	43%
Assault with Injury	9	3%
Common Assault	37	14%
Harassment	57	22%
Other Violence Categories	5	2%
Serious Wounding	5	2%
Other Crime Type	23	9%
Total	265	100%

18. Offences were predominantly recorded between 9am and 22:59pm, peaking slightly at lunchtime and after 1700pm.

Betting Shop Area Crime Map

19. The map below shows all betting shops across the Borough over the past 3 years, with the circle showing the number of offences at each point. Hot spots are also highlighted. The areas with the highest proportion of crime are the **Nags Head, Finsbury Park, Seven Sisters Road** and **Angel**.

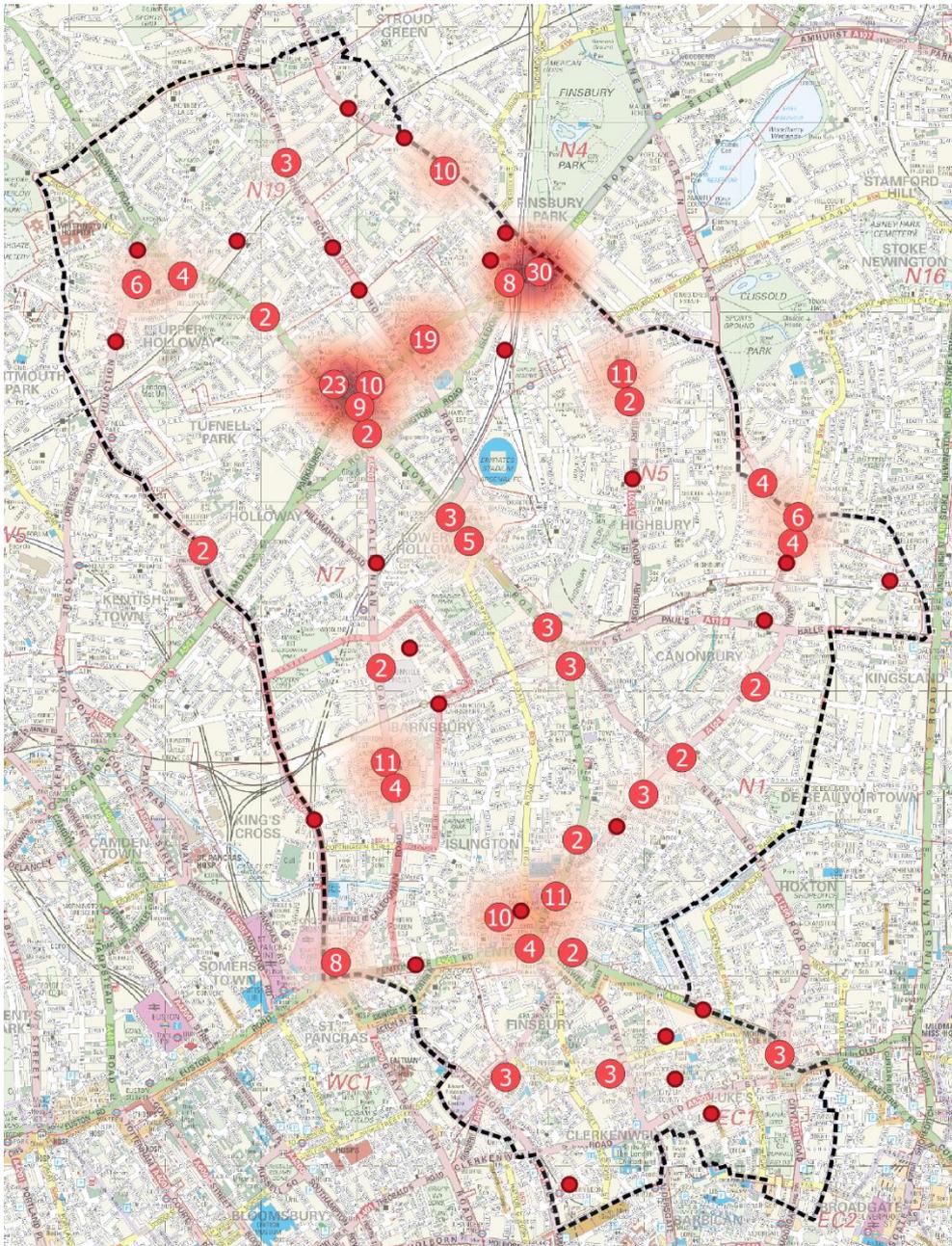


Diagram 2 – Showing the location of Betting Shops and the location of offences.

20. The following map shows street based anti-social behaviour (ASB) in close proximity to each betting shop. This excludes noise complaints. The darker reds show a higher level of street based ASB.

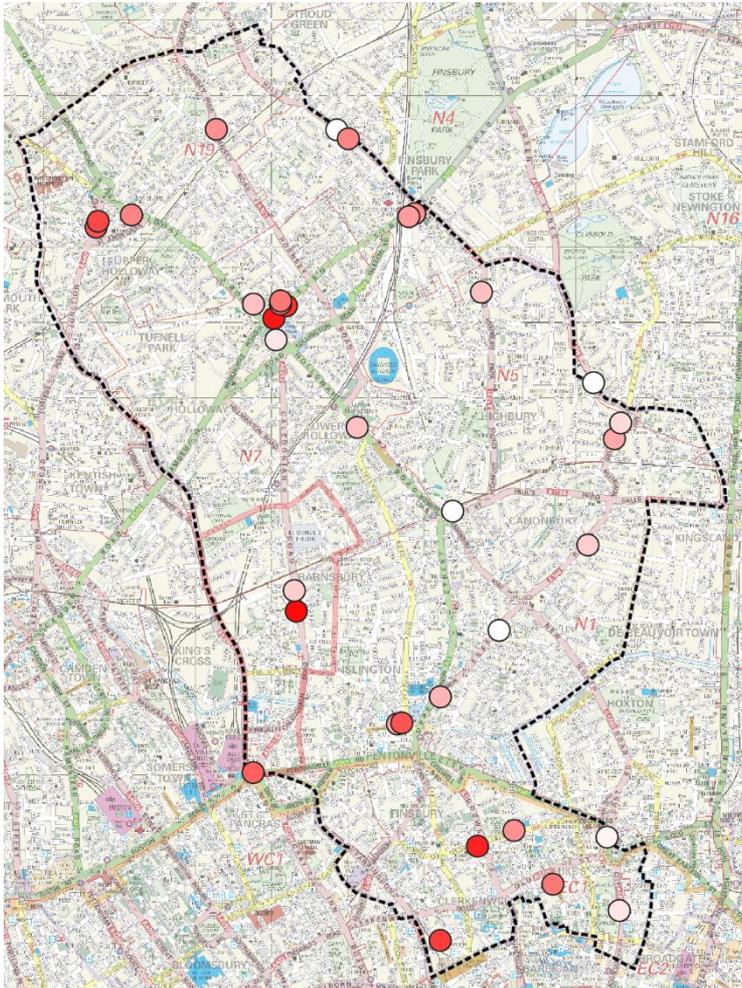


Diagram 3 Street based antisocial behaviour near betting shops.

21. The highest volume of ASB in close proximity to a betting shop was on Caledonian Road, linked to ASB on the Bemerton Estate. This was followed by Seven Sisters Road and in proximity to the betting shops at the Nags Head.

Model premises licence conditions

The Council will expect applicants to offer their own measures to meet the licensing objectives. However appropriate measures / licence conditions may cover issues such as:

- CCTV
- supervision of entrances / machine areas
- physical separation of areas
- location of entry
- notices / signage
- specific opening hours
- self-barring schemes
- measures / training for staff on how to deal with suspected truant school children on the premises.
- provision of information leaflets/helpline numbers for organisations such as GamCare and Betknowmore UK

This appendix contains model licence to assist applicants selecting the most appropriate control measures arising from risk assessment.

1. SECURITY AND SAFETY

- 1.1. There shall be always at least 2 floor staff on duty at the premises when the premises are open.
- 1.2. In addition to the 2 floor staff the need for an SIA door supervisor to be on duty at the premises shall form part of a risk assessment on a quarterly basis. Written records of the risk assessments shall be retained and shall be made available to an authorised Council officer immediately upon request.
- 1.3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Council or the Met Police. It must be completed within 24 hours of the incident and will record the following:
 - all crimes reported to the venue
 - all ejections of patrons
 - any complaints received concerning crime and disorder
 - any incidents of crime, disorder, abuse or threats to staff
 - any faults in the CCTV system
 - any visit by a relevant authority or emergency service
- 1.4. The premises will have an intruder alarm and a panic button.
- 1.5. Maglock or similar systems are employed and access controlled.
- 1.6. Full height security screens to be installed.
- 1.7. A requirement for 50 per cent of the shop frontage to be clear of advertising so that staff have a clear view and can monitor the exterior of the premises.
- 1.8. Staff on the premises shall have a clear view of all customers and machines on the premises.
- 1.9. The premise shall maintain a 'safe haven' to the rear of the counter.

2. PROTECTION OF VULNERABLE PERSONS

- 2.1. Prominent GamCare, Bet No More and other Gambling charity documentation will be displayed at the premises.
- 2.2. There shall be no cash point or ATM facilities on the premises.
- 2.3. All notices regarding gambling advice or support information must be translated into other languages appropriate for the area.
- 2.4. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request.

3. UNDERAGE CONTROLS

- 3.1. Customers under 21 will have to provide ID
- 3.2. The premises will operate a 'Think 21' Refusals policy and prominent signage and notices will be displayed showing the operation of such policy.
- 3.3. The Licensee shall maintain a bound and paginated 'Think 21 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
- 3.4. Staff will receive training and refresher training every six months on the care and procedures for dealing with vulnerable and young persons.
- 3.5. The premises will operate a 'challenge 25' policy and prominent signage and notices will be displayed showing the operation of such policy.
- 3.6. Compulsory third party test purchasing on a twice yearly external system and the results to be reported to the Local Authority and police. In the first twelve months two additional internal test purchase operations to be carried out.

4. CCTV

- 4.1. The premises shall ensure that CCTV cameras and recorders are installed at the premises, that provide clear images of all key customer facing locations within the building.
- 4.2. The system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.
- 4.3. The CCTV camera views are not to be obstructed.
- 4.4. At least one CCTV camera is to be placed no more than seven feet above floor level; near to the entrance/exit to capture clear facial images of all persons entering or leaving the premises.
- 4.5. The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the Police or Local Authority upon request.
- 4.6. At all times when the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be available to assist the Police or an authorised officer in obtaining the CCTV footage.

- 4.7. Copies shall be made available within 48 hours to the Police or Local Authority, upon request.
- 4.8. The facility to transfer the images to a compatible, removable format, shall be held on the premises.
- 4.9. Signs must be displayed in the customer areas to advise that CCTV is in operation.
- 4.10. If the CCTV is inoperative or not installed and working to good working order, immediate repair should be sourced with reasonable timescale. The premises shall comply with all reasonable requests from the Police.
- 4.11. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering the premises.

5. ANTI-SOCIAL BEHAVIOUR

- 5.1. No persons carrying visibly open or sealed alcohol vessels shall be admitted to the premises at any time that the premises are open for any licensable activity.
- 5.2. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
- 5.3. The Licensee shall place and maintain a sign at the entrance which states that 'only refreshments purchased on the premises may be consumed on the premises'
- 5.4. Prior to opening the Licensee shall meet with the Crime Prevention Officer to discuss any additional measures to reduce crime and disorder.
- 5.5. The Licensee shall install and maintain an ultraviolet lighting system in the customer toilet.
- 5.6. The Licensee shall install and maintain a magnetic door locking system for the customer toilet operated by staff from behind the counter.
- 5.7. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
- 5.8.4 Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises and within the premises.
- 5.9. The Licensee shall develop and agree a protocol with the police as to incident reporting, including the type and level of incident and mode of communication, to enable the police to monitor any issues arising at or in relation to the premises.
- 5.10. The Licensee shall place a notice visible from the exterior of the premises stating that drinking alcohol outside the premises is forbidden and that those who do so will be banned from the premises

6. STAFF TRAINING

- 6.1. The Licensee shall ensure that all customer facing staff and managers complete a comprehensive staff training programme to have sufficient knowledge and training to tackle risks associated with gambling and know how to promote safer gambling
- 6.2. Conduct refresher training at least every six months.
- 6.3. The training shall, as a minimum, cover:
 - the importance of social responsibility (Premises may wish to seek an audit from GamCare in order to obtain a certificate of Social Responsibility)

- Betknowmore UK, www.betknowmoreuk.org which is based in Islington, providing advice to businesses and support and mentoring to customers who self-refer
- causes and consequences of problem gambling
- identifying and communicating with vulnerable persons: primary intervention and escalation
- Dealing with vulnerable persons and the procedures for recognising and assisting those who gamble more than they can afford, giving help and advice on self-exclusion and how to seek help
- dealing with problem gamblers: exclusion (mandatory and voluntary) and escalating for advice/treatment
- refusal of entry (alcohol and drugs)
- the law relating to underage gambling and the procedure where a person who appears to be underage enters, or attempts to enter, the Premises
- age verification procedures and need to return stakes/withdraw winnings if underage persons found gambling
- importance and enforcement of time/spend limits
- the conditions of the licence
- have access to and understand the local risk assessment
- maintaining an incident log
- offences under the Gambling Act
- categories of gaming machines and the stakes and odds associated with each machine
- types of gaming and the stakes and odds associated with each
- staff exclusion from gambling at the premises where they are employed and reasons for restriction
- the 'no tipping' rule
- staff safety procedures
- ability to signpost customers to support services with respect to problem gambling, financial management, debt advice etc.
- safe cash-handling/payment of winnings
- identify forged ID and bar those using forged ID from the premises
- knowledge of a problem gambling helpline number (for their own use as well as that of customers)
- the importance of not encouraging customers to:
 - increase the amount of money they have decided to gamble
 - enter into continuous gambling for a prolonged period
 - continue gambling when they have expressed a wish to stop
 - regamble winnings
 - chase losses.
 - Anti-Money Laundering and the Proceeds of Crime Act 2002;
 - Conflict management: managing violent, drunk, or intoxicated customers
 - Recording and reporting procedures.
 - Health and safety at work
 - Disciplinary procedures
 - Operation of the premises CCTV system

6.4. Participation in the training shall be mandatory and all staff training shall be formally recorded. Those records shall be made available for inspection by the Police or Licensing Authority on request.

7. Record Keeping Information

7.1. Maintain an incident log and share this and other information with the Licensing Service upon request.

7.2. Data that we consider should be recorded and shared includes (but is not exclusive to):

- number of interventions in a calendar month along with a short description of the cause and effect
- number of cases in a calendar month where persons who have decided to voluntarily exclude themselves from the premises have tried to gain entry
- number of mandatory exclusions needing enforcement in a calendar month along with a short description of the cause and effect
- attempts to enter by those underage in a calendar month along with short description of incident and action
- attempts to enter by those underage in the company of adults in a calendar month along with short description of incident and action
- attempts to enter by those underage with complicit adults in a calendar month along with short description of incident and action
- incidents of 'at risk behaviour' in a calendar month along with short description of incident and action
- Incidents of 'behaviour requiring immediate intervention' in a calendar month along with short description of incident and action.

Responsible Authority's Contact Details

Chief Officer of Police	Metropolitan Police Islington Licensing Police C/O Public Protection Division 222 Upper Street London N1 1RE Email: CNMailbox-.IslingtonPoliceLicensingTeam@met.police.uk
Gambling Commission	Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Tel: 0121 230 6666 Email: info@gamblingcommission.gov.uk
London Fire Brigade	Fire Safety Regulation: North East Area 2 London Fire Brigade 169 Union Street London SE1 0LL Tel: 020 8555 1200 Email: FSR-AdminSupport@london-fire.gov.uk
Planning and Development Islington Council	Town Hall Upper Street London N1 2UD Tel: 020 7527 2000 Email: Planning@islington.gov.uk
Licensing Service Public Protection Division, Islington Council	222 Upper Street London, N1 1XR Tel: 020 7527 3031 Email: licensing@islington.gov.uk
Islington Safeguarding and Quality Assurance Team	Children Services 222 Upper Street London N1 1XR Tel: 020 7527 2000 Email: S&QA@islington.gov.uk
HM Revenues & Customs	Alexander House 21 Victoria Avenue Southend-On-Sea Essex SS99 1BD Tel: 0845010 9000 Email enquiries.est@gmrc.gsi.gov.uk

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Gambling Premises Licensing Policy

Consultation Feedback and LBI Response

October 2022

Consultation Feedback	LBI Response
1.Ward Councillor	
I completely support the No Casinos policy.	Noted
<p>I note that section 21 of the draft policy says; Licensed betting premises are only permitted to offer gambling facilities between 7am and 10pm, unless the council has granted a variation application to extend these hours. The concern is that later opening hours will attract the more vulnerable, such as those who are intoxicated or who have gambling addictions, and that licensed betting premises operators may seek to extend the permitted hours for the primary purpose of making gaming machines available to customers for longer. Therefore, it is unlikely that a variation of hours' will be granted unless applicants can demonstrate that robust measures will be in place to protect the vulnerable and that the additional hours are not being sought to take advantage of the gaming machine entitlement.</p>	<p>This section has been extended and reworded to reflect the statutory requirements for betting shop and adult gaming centres open hours</p>
<p>I would not support gambling facilities operating outside 7am to 10pm even with robust measures in place to protect the vulnerable. <i>I don't know if consideration was given to tightening this section up so that there is effectively a ban on gambling outside these times.</i> We have seen during covid a big rise in people dealing with gambling addiction and it seems like anything we can do to remove or limit temptation is a good thing.</p>	<p>The Gambling Act does not permit councils to impose an outright ban on extending opening hours.</p> <p>The council has two relevant legal responsibilities:</p> <ol style="list-style-type: none"> 1. Aim to permit gambling activities 2. Treat each application on on

	its own merits
Given that the borough is six square miles it feels like we have surely already reached/exceeded saturation level. There can't be many places in the borough where you would need to walk for more than 5 or 10 minutes to find somewhere to gamble. What is considered saturation? Surely beyond the point of saturation and would like committee to be able to refuse by reason of saturation policy. Members should be trained on what is saturation and the grounds for refusal. It is no surprise that the clusters of places where you can gamble are to be found in the areas of highest deprivation in the borough which include Archway in my ward.	<p>The Gambling Act does not permit councils to adopt a saturation policy but it can address the issue of saturation, clusters on a case by case basis taking into account:</p> <ul style="list-style-type: none"> • The Local Area Profile • The applicant's risk assessment and control measure to promote the three licensing objective • The licensing objective to prevent crime and disorder and protect vulnerable people from

	<p>gambling related harms.</p> <p>The definition of vulnerability has been extend to encompass a wider range of gambling related harms .</p> <p>The data in the Local Area Profile highlights Gambling Vulnerability Zones</p>
2. Ward Councillor	
agrees with above.	Noted
3. Executive Member for Community Safety & Licensing Committee	
Address points made above and seek to tighten up even further. Arrange training sessions for Members. Numbers of betting shops remain too high.	Noted
Unfortunately, 'saturation' is not a term used in the Gambling Act; there is no statutory provision in the Gambling Act which allows us to look at saturation or cumulative impact. Instead, we imported this idea from the Licensing Act and have linked saturation to the Local Area profiles and gambling risk index, believing that an evidence-based model which highlights the very real gambling-related harms gives us more teeth, so to speak. It remains hugely frustrating that the Act limits, in my opinion, our ability to uphold the three licensing objectives set out in the Gambling Act.	Noted
We have seen a notable decline in betting shops in Islington over the years—but they remain too high. We should do all that we can to deter, divert and prevent gambling premises in Islington. The key now is finding the best mechanisms for doing so – and being bold in our approach.	

<p>With all that in mind, the committee agreed the following action points at an Informal Licensing Committee on the 1 September 2022.</p> <ul style="list-style-type: none"> Betting premises hours. Review paragraph 21. Look at reduction of hours/deletion of paragraph/deletion of reference to variation. Legal advised <p>“The licensing authority expects all premises licence applications to specify opening hours.</p> <ul style="list-style-type: none"> Betting shops - The default conditions provide that betting premises are permitted to offer gambling facilities between 7am and 10pm. The council may decide to exclude the default conditions and only permit a betting premises to offer gambling facilities during reduced hours. Decisions will be made on a case by case basis where there is evidence to support the need for this to promote the licensing objectives Adult Gaming Centres - Particular attention will be paid to the opening hours for Adult Gaming Centres which do not have opening hours specified as part of their mandatory conditions. Applicants will be expected to set opening hours that promote the licensing objectives 	<p>This section has been extended and reworded to reflect the statutory requirements for betting shop and adult gaming centres open hours</p>
<p>Meet with Planning to see if more can be done in partnership re: planning concerns raised in relation to gambling premises.</p>	<p>Planning have responded to the consultation and there feedback has been incorporated in to the revised draft policy</p>
<p>CLlr and Cllr raised concern re planning decision to refuse betting shop overturned on appeal. They hope the outcome of this appeal will help inform a strengthening of our Licensing policy.</p>	<p>Noted</p>
<p>Stringent conditions be added to the policy</p>	<p>Appendix 2 has been amended to provide a pool of model conditions that may be appropriate to attach to a licence on a</p>

	case by case basis
Reduce the Gambling Index to 20. Produce a map detailing indicating this reduction and send to members of the Committee.	Areas with a Gambling Index above 20 have been classified as Gambling Vulnerability Zones Diagram 2 in the revised draft Gambling Premises Licensing Policy contains a borough map highlighting these areas
Produce an additional map indicating high risk venues eg schools.	The list of high risk venues has been extended. Whilst a map showing the local of all high risk venues in the Policy could be useful there is a risk that this information could quickly become out of date and misleading for applicants and residents.
Look at using the Sustainable Community Act 2007 for betting shops.	The Act requires the Government to trigger the application of the Act.
Framing this as a public health issue. (reference this study)—we could be much more forceful in this section of the policy:	Public Health have assisted in the collation

	of data to create the Gambling Risk Index and the Local Area Profiles .
'The Licensing Authority recognises that when gambling becomes harmful it becomes a public health issue. Whilst gambling is a leisure activity enjoyed harmlessly by many, some individuals experience significant harm as a result of their gambling. Problem gambling is defined as gambling that is disruptive or damaging to you or your family or interferes with your daily life(1) whereas gambling related harm is the impact of problem gambling which may affect others as well as the person gambling.'	Noted
If we don't, or haven't already, could we use Public Health 'Betting shops and subprime lenders in Islington: health' at Appendix 3 Retail, Leisure and Services, Culture and Visitor Accommodation (islington.gov.uk) which collates multiple evidence on the harm of gambling as well as Islington specific evidence and context of the proliferation of gambling businesses.	The section on Development Control as been amended and now includes reference to Local Policies and a link to Appendix 3.
<p>Online gambling—this needs to be incorporated into the report, thereby strengthening the claim of saturation; it would significantly bolster our local evidence base:</p> <p>For online gambling, the best data is the Patterns of Play reports that were produced by the University of Liverpool and NatCen Social Research. They showed that online gaming (casino, slot, bingo) are more popular in areas of greatest deprivation, and the industry derives greatest gaming yield from these areas. We should relate this insight to our borough in terms of levels of deprivation and greater propensity for online gambling.</p> <p>The relevant paragraph is here: (from this report: https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final.pdf).</p> <ul style="list-style-type: none"> ▪ Compared with betting, all gaming products were more likely to be used by players who lived in areas with higher levels of deprivation: ▪ Nearly 40% of bingo players and nearly 35% of instant win players resided in the 20% of most deprived areas. For slots, casino games and poker, the corresponding proportions were 31%, 28% and 26%; ▪ In terms of GGY, 39% of bingo spend originated in the 20% most deprived areas and 	Whilst the council is not responsible for regulating on-line gambling research on gambling related harm associated with on-line gambling is relevant to mitigating or eliminating the risk of gambling related harm arising from licenced gambling premises.

<p>only 6% in the 20% least deprived areas. For the other products, the corresponding figures were: slots (25% / 14%), casino (21% / 17%), poker (19% / 22%) .</p> <p>There is also research showing that online casino gambling generates a substantial proportion of expenditure from those at-risk or harmed by gambling: see here: https://www.tandfonline.com/doi/full/10.1080/14459795.2022.2088823</p>	<p>The research supports the new measures identified in the draft policy, in particular:</p> <p>Widening the definition of protecting vulnerable people from gambling related harm</p> <p>Using the Gambling Risk Index to define Gambling Vulnerability Zones</p>
<p>licensing objectives— ‘protecting...vulnerable people’—extend definition to reflect current thinking on protecting vulnerable people from gambling related harm, crime and gambling</p>	<p>This has been incorporated in the revised draft policy</p>
<p>In support of the ASB/crime stats in the policy, we should include new research that strengthens the claim that problem gambling links to crime: https://howardleague.org/publications/crime-and-problem-gambling-a-research-landscape/</p>	<p>This link is now included in appendix 1</p>
<p>4. Planning & Development response</p>	
<p>The following are comments on the Gambling Policy 2023-2026 by Planning Policy and Development Management.</p> <ul style="list-style-type: none"> • Paragraph 5 – it is not the case that housing demand is being met by fast paced redevelopment of commercial and business premises for residential use. The redevelopment of commercial premises, including for mixed use development has been one element of housing supply. We would suggest that the key element of this paragraph highlights that the character of the borough is mixed use in many areas with commercial and residential uses in very close proximity. 	<p>This section has now been deleted</p>

<ul style="list-style-type: none"> • Paragraph 16 sits under the 'Development Planning' subheading. It is not clear how this links back to planning and it may be more suitable elsewhere in the document. The wording of the paragraph is also unclear - 'A gambling premises will only be issued in relation to premises'. Should this say 'A gambling premises license will only be issued in relation to premises that the council deems to be able to start trading soon'? 	This section has now been deleted
<p>In the 'Development Planning' section – perhaps there is scope to flag that planning applications for new gambling premises will be considered against relevant Local Plan policies, this includes policies which look at the location and concentration of such uses and their impacts. It is also needed to be explicit that there is a clear distinction between the licensing and planning regimes and they are separate processes with different criteria. Perhaps this could be added at the end of Para.17</p>	The section has been amended to reflect this feedback
<p>Paragraph 39 – In relation to the Local Area Profile more explanatory information might be helpful on how applicants should consider and interact with the Local Area Profile. At the moment applicants might reasonably focus on one part of Appendix 1. For instance, Diagram 2 may be cited as a reason to support a license because it is not next to point data for criminal offences when in fact it is still within an area that is high on the Gambling Risk Index. Furthermore, it should be considered whether it is optimal to include the Area Profile in the Gambling Policy and would it be better if this was separate so that it can be updated and added to over time? Alternatively, the policy could caveat that the Area Profile and Gambling Risk Index is subject to change when new data becomes available but then consideration of how this will be updated, published and accessed needs to be had.</p>	These sections have been reworded to reflect feedback
<p>Limiting operating hours from 7am to 10pm is positive. This removes ability for 24/7 AGCs to set up which exacerbate the harms of gambling premises.</p>	A new opening hours paragraph is now included to reflect the requirements of the Gambling Act
<p>The licensing team should consider referencing the source of the Gambling Risk Index.</p>	This is now included
<p>Paragraph 42 – In relation to the list of sensitive premises, this should include pay day loan shops and pawnbrokers. These two uses are cited in Local Plan policy R8 as potentially harmful. Pay</p>	The list of sensitive premises has

<p>day loan shops and pawnbrokers in close proximity to gambling premises can facilitate problem gambling and spiralling debt.</p>	<p>now been extended to include these types of premises</p>
<p>How is paragraph 43 going to work? This looks like it needs some further explanation. Additionally, paragraph 43 focuses on what existing premises should do but what about the production of a risk assessment for new premises?</p>	<p>These sections have been reworded to reflect feedback</p>
<p>5. Paddy Power - Operator - Submitted by solicitors Poppleston Allen</p> <p>Power Leisure Bookmakers Limited response to Islington Borough Council Consultation on its draft Statement of Gambling Principles 2023-2026</p>	
<p>Paddy Power is Ireland's biggest Bookmaker and operate both as retail business through licensed betting offices and an online/telephone business. Paddy Power is a leading national operator of betting premises with clear and proactive policies to promote the Gambling Licensing Objectives. Operators of premises licences have full authority to provide their services by the provision of an Operating Licence granted by the Gambling Commission. The UK's gambling regulator has therefore approved the measures implemented and those policies have been developed that ensure responsible trading in accordance with gambling legislation, the licensing objectives and the Licence Conditions and Codes of Practice.</p>	<p>Noted</p>
<p>Foreword We strongly disagree with the commentary included in the draft policy as it does not appropriately identify the permissive regime envisioned by Parliament and implemented by the Gambling Act 2005. References to 'evidence', and the effective imposition of a cumulative impact area fails to reconcile the extensive provisions already in place under the current governing legislation. The Authority's policy, as per section 349 of the Gambling Act 2005, should contain the principles that it proposes to apply in exercising its functions under the Act, it is therefore not an appropriate document to contain additional commentary, which is beyond the scope of the policy's function.</p>	<p>The draft policy has been revised to reflect this comment, In particular we have:</p> <p>Realigned or deleted specific paragraphs to ensure that the policy reflects the requirements</p>

	<p>and duties under the Act</p> <p>Updated the Islington in context paragraphs to reflect current council's strategic vision relevant to the council statutory duty to promote the licensing objectives</p> <p>Clearly defining the council's duties and functions under the Act</p>
<p><i>Betting Premises</i></p> <p>Under paragraph 21 in the draft policy the statement of <i>'it is unlikely that a variation of hours' will be granted unless applicants can demonstrate that robust measures will be in place to protect the vulnerable and that the additional hours are not being sought to take advantage of the gaming machine entitlement.</i> Whilst we commend the council's approach to identify risk of gambling related harm and ensure appropriate procedures are implemented and information made readily available, this first statement is contrary to and seeks to undermine the 'aim to permit' principle under section 153 of the Gambling Act 2005.</p> <p>Betting premises are permitted by law to operate gaming machines. It is not within the Authority's remit to determine a licensee's proposed business model or restrict the activities operated during specified hours unless evidence led concerns are identified which cannot be mitigated by an operators control measures. It remains incumbent on all licensees to ensure premises are operated in accordance with the governing legislation and implement extensive and effective policies procedures and control measures to ensure that all permitted gambling activities are operated in a socially responsible manner. The Authority has not provided any evidence to support a suggestion that later hour of operation lead to an increased risk of harm for any particular activity and each operators proposed control measures must be assessed on the merits and the ability</p>	<p>This section has been reworded</p>

<p>to mitigate any potential or theoretical risk of harm. Any presumption of refusal is in direct conflict with the permissive licensing regime.</p>	
<p>Exchange of information Paragraph 23 contains restrictive language, which is contrary to the governing legislation and any suggestion that <i>'the council will use their power to restrict the number of betting machines' must be supported by local evidence of potential harm that cannot be mitigated by an operator's policies and operational safeguards.</i> Licensing Authorities are under the statutory obligation to aim to permit the use of premises for gambling so far as the authority believes that an application is reasonably consistent with the licensing objectives, in accordance with the LCCP and the Gambling Commission's guidance. A blanket refusal or an aim to restrict proposed activities is contradictory to this obligation. The policy also fails to justify why this restrictive obligation is contained under the exchange of information heading. This is a misleading placement for such a restriction under the policy and can lead to burdens being placed on operator in an inadequate place within the policy.</p>	<p>This section has been deleted</p>
<p>Part 3 Local Area Profile and Saturation Under Gambling Commission LCCP provisions operators will be required to complete local area risk assessments that identify risks posed to the licensing objectives and how these should be mitigated. We refer the Authority to the Regulators' Code, which provides that in making an assessment of risk, regulators should recognise the compliance record of those they regulate and take an evidenced based approach to determining the priority risks in their area of responsibility. To ensure that better regulation principles are followed, operators should be allowed to assess their existing operational processes, informed by Statements of Principle, which highlight potential areas of particular sensitivity and known vulnerability. High risk areas must only be identified where empirical evidence is adduced that clear gambling related harm would be caused by the presence of gambling related premises. Identification of theoretical risk factors such as area demographics, ethnicity, proximity to other premises and deprivation should only be included where local evidence is available, which quantifies the ascertainable risk to be mitigated. Any proposed measures to address risks identified should be proportionate, effective and tailored to specific concerns identified. All risks must be substantiated in order to prevent the implementation of a disproportionate regulatory burden upon operators. Well managed and controlled premises, compliant with the Gambling Commission's LCCP, do not pose a gambling related risk to children and young</p>	<p>This section has been amended. In particular</p> <ul style="list-style-type: none"> • The reference to saturation has been removed • The definition of vulnerable persons has been extended to reflect local knowledge of the types of vulnerable persons in our borough that we have a duty

<p>people and additional measures, controls or conditions considered should not be imposed to address wider social issue. As a result, we believe the draft policy must be amended to follow the above principles, as the suggested draft does not adhere to better regulation.</p> <p>Evidence of harm and risks associated with gambling must be considered alongside operator's proposals and applications cannot be subject to presumption of refusal. In order to fully address any potential concerns, all risk profiles must be based upon factual evidence of gambling related harm in consideration of those measures already in place to mitigate actual rather than theoretical risk. Under paragraphs 32 & 33 the policy refers to 'evidence' without producing this evidence for scrutiny. This 'evidence' should be made available for review. Cumulative impact has no statutory basis under the gambling regime and any suggestion of cumulative harm from licensed premises must be supported by local evidence.</p>	<p>to protect from gambling related harm</p>
<p>Paragraph 39 specifically refers to Local Area Profile, which creates a presumption to refuse. This statement is unlawful and is not consistent with the requirement of the Gambling Act 2005 as S.153 which requires licensing authorities in exercising their functions to permit the use for gambling. This creates a presumption of granting applications and therefore prohibits Islington from opposing any policy to state it 'unlikely' to grant application. The policy is prescriptive, disproportionate and is not substantiated with evidence of issues relating to licensed premises to justify the proposed policy.</p> <p>We acknowledge that information regarding local profiles is an important tool to assist operators identifying potential risks to the Licensing Objectives under the Act. Evidenced led assessments enable the implementation of appropriate policies and procedures to mitigate any risks identified.</p> <p>Paddy Power is a responsible operator and implements measures to address local risks that to activities that would take place within their premises</p>	<p>The paragraph has been revised.</p> <p>The 'aim to permit duty' was included in the draft policy but it has been moved to give more prominence in the revised draft</p>
<p>Gambling Best Practice</p> <p>The draft policy refers to a 'gambling best practice' document. This document produces requirement upon Gambling Operators to perform due diligence and other added requirements such as incident logs, improved staff knowledge and management of crime to their operational style. Operators at present must interact and evaluate customer behaviour to ensure all gambling is in accordance with the social responsible gambling provisions of the LCCP. We believe this 'gambling best practice' is a duplication of these requirements.</p>	<p>This appendix has been deleted from the Policy and replaced with model conditions that may be appropriate to licences on a case-by-case basis.</p>

<p>Crime and Disorder Paragraph 50. States a blanket refusal statement on ATM machines. There is no evidence provided to justify this limitation. All operators must evaluate the risks of harm created by their operation and ensure that all gambling remains socially responsible. Obligations include monitoring customer behaviour, spend and affordability, which should ensure that where ATM machines situated any risk posed by their availability is mitigated. We acknowledge this statement has been historically included within Islington Borough Councils Gambling Policy.</p>	Paragraph deleted and ATM condition included in the model conditions in appendix 2
<p>Gambling Policy Evidence Base: Local area profile. Public Health May 2022 Under paragraph 2 & 3 of the above, there is citation provided however this is not referenced anywhere further. As a result, this evidence is not able to be scrutinised. The statements made under the Public Health May 2022 document are very broad, there is no reasoning provided as to why this is included within Islington Gambling Policy. Authorities must evaluate local evidence and care must be taken when drawing conclusions from macro societal trends, which may not be realised within the local authority's jurisdiction. Public Health data is a valuable tool to assist operators in identifying potential risks and ensuring they implement effective measures to address and mitigate any risk of harm.</p>	Noted
<p>Conclusion We are committed to working in partnership with the Gambling Commission and local authorities to continue to promote best practice and compliance in support of the licensing objectives.</p>	Noted
<p>6.Merkur Slots UK Limited - Submitted by solicitors Poppleston Allen Merkur Slots UK Limited and Merkur Bingo & Casino Entertainment UK Limited response to Islington Borough Council Consultation on its draft Statement of Gambling Principles 2023-2026.</p>	
<p>The Merkur Group of companies is a leading national operator of bingo, AGC and FEC premises with clear and proactive policies to promote the Gambling Licensing Objectives. Operators of premises licences have full authority to provide their services by the provision of an Operator's Licence granted by the Gambling Commission. The UK's gambling regulator has therefore approved the measures implemented and those policies have</p>	The responses to the issues raised are addressed above

been developed that ensure responsible trading in accordance with gambling legislation, the licensing objectives and the Licence Conditions and Codes of Practice. Of particular relevance are the obligations and requirements now placed upon operators under the social responsibility provisions of the LCCP, introduced by the Gambling Commission.

Foreword

We strongly disagree with the commentary included in the draft policy as it does not appropriately identify the permissive regime envisioned by Parliament and implemented by the Gambling Act 2005. References to 'evidence', and the effective imposition of a cumulative impact area fails to reconcile the extensive provisions already in place under the current governing legislation.

The Authority's policy, as per section 349 of the Gambling Act 2005, should contain the principles that it proposes to apply in exercising its functions under the Act, it is therefore not an appropriate document to contain additional commentary, which is beyond the scope of the policy's function.

Draft Policy Comments

While Merkur Slots UK Limited and Merkur Bingo & Casino Entertainment UK Limited do not operate betting premises. However, we strongly believe the current draft policy is contradictory to the current ethos to permit under the current governing legislation and therefore raise our concerns.

Betting Premises

Under paragraph 21 in the draft policy the statement of *'it is unlikely that a variation of hours' will be granted unless applicants can demonstrate that robust measures will be in place to protect the vulnerable and that the additional hours are not being sought to take advantage of the gaming machine entitlement.* Whilst we commend the council's approach to identify risk of gambling related harm and ensure appropriate procedures are implemented and information made readily available, this first statement is contrary to and seeks to undermine the 'aim to permit' principle under section 153 of the Gambling Act 2005.

Betting premises are permitted by law to operate gaming machines. It is not within the Authority's remit to determine a licensee's proposed business model or restrict the activities operated during specified hours unless evidence led concerns are identified which cannot be mitigated by an operators control measures. It remains incumbent on all licensees to ensure premises are operated in accordance with the governing legislation and implement extensive and effective policies procedures and control measures to ensure that all permitted gambling activities are operated in a socially responsible manner. The Authority has not provided any evidence to support a

suggestion that later hour of operation lead to an increased risk of harm for any particular activity and each operators proposed control measures must be assessed on the merits and the ability to mitigate any potential or theoretical risk of harm. Any presumption of refusal is in direct conflict with the permissive licensing regime.

Part 3 Local Area Profile and Saturation

Under Gambling Commission LCCP provisions operators will be required to complete local area risk assessments that identify risks posed to the licensing objectives and how these should be mitigated. We refer the Authority to the Regulators' Code, which provides that in making an assessment of risk, regulators should recognise the compliance record of those they regulate and take an evidenced based approach to determining the priority risks in their area of responsibility. To ensure that better regulation principles are followed, operators should be allowed to assess their existing operational processes, informed by Statements of Principle, which highlight potential areas of particular sensitivity and known vulnerability. High risk areas must only be identified where **empirical** evidence is adduced that clear gambling related harm would be caused by the presence of gambling related premises. Identification of theoretical risk factors such as area

demographics, ethnicity, proximity to other premises and deprivation should only be included where local evidence is available, which **quantifies** the ascertainable risk to be mitigated. Any proposed measures to address risks identified should be proportionate, effective and tailored to specific concerns identified. **All risks must be substantiated in order to prevent the implementation of a disproportionate regulatory burden upon operators.** Well managed and controlled premises, compliant with the Gambling Commission's LCCP, do not pose a gambling related risk to children and young people and additional measures, controls or conditions considered should not be imposed to address wider social issue. As a result, we believe the draft policy must be amended to follow the above principles, as the suggested draft does not adhere to better regulation.

Evidence of harm and risks associated with gambling must be considered alongside operator's proposals and applications cannot be subject to presumption of refusal. In order to fully address any potential concerns, all risk profiles must be based upon factual evidence of gambling related harm in consideration of those measures already in place to mitigate actual rather than **theoretical risk**. Under paragraphs 32 & 33 the policy refers to 'evidence' without producing this evidence for scrutiny. This 'evidence' should be made available for review. Cumulative impact has no statutory basis under the gambling regime and

any suggestion of cumulative harm from licensed premises must be supported by local evidence.

Paragraph 39 specifically refers to Local Area Profile, which creates a presumption to refuse. This statement is unlawful and is not consistent with the requirement of the Gambling Act 2005 as S.153 which requires licensing authorities in exercising their functions to permit the use for gambling. This creates a presumption of granting applications and therefore prohibits Islington from opposing any policy to state it 'unlikely' to grant application. The policy is prescriptive, disproportionate and is not substantiated with evidence of issues relating to licensed premises to justify the proposed policy.

We believe the policy as drafted at present is inconsistent with S.153 of the Gambling Act 2005 which requires the licensing authorities in exercising their functions (at) to permit the use of premises for gambling.

We acknowledge that information regarding local profiles is an important tool to assist operators identifying potential risks to the Licensing Objectives under the Act. Evidenced led assessments enable the implementation of appropriate policies and procedures to mitigate any risks identified

Gambling Best Practice

The draft policy refers to a 'gambling best practice' document. This document produces requirement upon Gambling Operators to perform due diligence and other added requirements such as incident logs, improved staff knowledge and management of crime to their operational style. Operators at present must interact and evaluate customer behaviour to ensure all gambling is in accordance with the social responsible gambling provisions of the LCCP. We believe this 'gambling best practice' is a duplication of these requirements.

Crime and Disorder

Paragraph 50. States a blanket refusal statement on ATM machines. There is no evidence provided to justify this limitation. All operators must evaluate the risks of harm created by their operation and ensure that all gambling remains socially responsible. Obligations include monitoring customer behaviour, spend and affordability, which should ensure that where ATM machines situated any risk posed by their availability is mitigated. We acknowledge this statement has been historically included within Islington Borough Councils Gambling Policy.

Gambling Policy Evidence Base: Local area profile.

Public Health May 2022

Under paragraph 2 & 3 of the above, there is citation provided however this is not referenced anywhere further. As a result, this evidence is not able to be scrutinised. The statements made under the **Public Health May 2022 document** are very broad, there is no reasoning provided as to why this is included within

<p>Islington Gambling Policy. Authorities must evaluate local evidence and care must be taken when drawing conclusions from macro societal trends, which may not be realised within the local authority’s jurisdiction. Public Health data is a valuable tool to assist operators in identifying potential risks and ensuring they implement effective measures to address and mitigate any risk of harm.</p> <p>Conclusion We are committed to working in partnership with the Gambling Commission and local authorities to continue to promote best practice and compliance in support of the licensing objectives.</p>	
7. Betknowmore UK	
<p>About Betknowmore UK Betknowmore UK was launched in 2014 and today we are a growing charity based in Islington, London. Our mission is to reduce gambling harms and we provide support to people from diverse communities, empowering them and building hope, as well as offering comprehensive training on suicide prevention and safer gambling to industry, the health sector and to workplaces. Our aims are to increase awareness of gambling harms, improve the health and wellbeing of the people affected, increase access to our services and strengthen the impact of lived experience. We have lived experience of gambling harms embedded within our organisation, from our founder and CEO through to our frontline staff and volunteers, and we draw upon this lived experience in our response below. In addition, a number of our staff have experience working in the betting industry and they have also contributed to our response.</p> <p>General comments The new Gambling Policy for 2023–2026 builds upon the current Gambling Policy in the borough, with some welcome adjustments, but we would like to see the Policy be underpinned by a more progressive and innovative approach to gambling harms, pursuing a whole-council, whole-population and partnership approach to preventing and tackling the wide range of harms caused by gambling, including crime and anti-social behaviour, ill-health, homelessness and domestic abuse. The work of Greater Manchester Combined Authority could act as an example to Islington in this regard.</p>	<p>The draft policy has been renamed to ‘Gambling Premises Licensing Policy’ to reflect that the policy has been published in accordance with the requirements section 343 Gambling Act 2005 and specifically addresses the functions allocated to the council under the Gambling Act</p>
<p>While children, young people and “vulnerable people” are those identified by the Gambling Act 2005 as being in need of protection from gambling harms, we urge Islington to take a whole-population preventative approach. Anyone can engage in</p>	<p>The definition of vulnerable people in of protection from</p>

<p>harmful gambling, transitioning quickly from someone not harmed by their gambling to someone experiencing a wide range of complex and negative impacts for themselves and those close to them. A preventative approach would see Islington Council not only refuse new licenses to casinos or other gambling premises in areas where they are already clustered, but also seek to raise awareness of gambling harms among <i>all</i> customers of all gambling premises, as well as among all relevant staff and workers within those premises and within the Council itself, as well as policy, probation and prison services.</p>	<p>gambling harms has been extended as suggested</p>
<p>The implementation of the Gambling Policy relies upon a sufficiently staffed and skilled licensing team. We urge the Council to ensure that the licensing team is sufficiently resourced to enforce the Gambling Policy and to pursue a partnership approach to working with other Council teams, other statutory agencies, and community and voluntary sector organisations to prevent and address gambling harms. The responsibility for preventing and addressing gambling harms should sit across the Council and not just with the licensing team. For example, Islington's multi-agency Joint Strategic Needs Assessment (JSNA) looks at the current and future health, wellbeing and care needs of its population to inform and guide the planning and commissioning of health and social care services, yet does not currently make mention of gambling harms, though we estimate (using the data in the Policy) that over 10 thousand people in Islington are experiencing these harms as a result of their own gambling, with 6–10 thousand more being "affected others".</p>	<p>Noted</p>
<p>Overall, the policy needs to be copyedited as there are numerous errors that introduce confusion.</p>	<p>The revised draft policy has removed errors and duplications</p>
<p>Response to the "no casino" policy Betknowmore UK supports Islington's "no casino" policy, assuming that this is based upon a transparent consultative process with local residents and businesses. In the future, Betknowmore UK would like to be invited to contribute to such consultations. More generally we consider that the current number of all types of gambling premises within the borough is sufficient. Since the reduction of the stakes permitted on FOBTs, we have observed a general reduction in UK cities in the numbers of licensed betting shops but a growth in the number of adult gaming centres. We urge Islington to not grant new licenses to such premises as gambling operators find betting shops to be less profitable.</p>	<p>The 'no casino' policy was subject to wide consultation in 2004/5 when the licensing function for gambling premises moved from the magistrates court to local authorities.</p>

	The decision to continue the policy for a further three years is include in the Gambling Premises Licensing Policy consultation
<p>Specific comments</p> <p>Part 2</p> <p>12 The definition of the term “vulnerable persons” should include all those experiencing gambling harms (at any level). As stated above, while the Gambling Act 2005 focuses upon the protection of children, young people and vulnerable people, the scope of Islington’s Gambling Policy should broaden to prevent gambling harms, taking a whole-population approach and not just focusing on specific groups and the harms they already demonstrate.</p>	The definition of vulnerable people in of protection from gambling harms has been extended as suggested
<p>20 In addition to working with the Safeguarding and Quality Assurance team in order to protect children from gambling harm, the Council should implement a whole-council approach to addressing gambling harms, for example working with adult social care, housing and financial inclusion teams too, as recommended by the Local Government Association and Public Health England.¹ This whole-council approach is the best response to addressing the wide range of gambling harms that people can experience.</p>	Noted and agreed in principle but whole -council approach to gambling is outside the scope of the Gambling Premises Licensing Policy
<p>21 The trading hours of 7am-10pm are mentioned in relation of licensed betting premises. It is not clear if this covers adult gaming centres. If not, we would urge the Council to ensure these trading hours apply to all gambling premises within the borough.</p>	A new section on opening hours, which reflects the requirements of the Act, is included in the revised draft policy

¹ Local Government Association and Public Health England (2018) *Tackling Gambling Related Harm: A Whole Council Approach*, LGA and PHE.

<p>23 This item does not appear to bear any relation to topic of Exchange of Information. The item refers to “bet receipt terminals” but needs to acknowledge and make clear the types of betting machines that exist. Bet receipt (or self-service) terminals allow people to gamble online, while FOBTs do not offer opportunities to access operators’ online gambling platforms. Free-to-access computer terminals within gambling premises may also offer another means to gamble. All “machines” that enable gambling within licensed premises should be included within the Gambling Policy.</p>	<p>This paragraph has been deleted from the revised draft policy</p>
<p>27 Again, in acknowledgement of the broad range of gambling harms that can be experienced by any person (not just those falling within protected groups), a whole-population, whole-council approach is needed to address and prevent gambling harms.</p>	<p>The definition of vulnerable people in of protection from gambling harms has been extended</p>
<p>30 Betknowmore UK would like sub-divided premises to only receive licenses in exceptional circumstances. Split premises increase the risk of harms occurring and make their identification more difficult.</p>	<p>The section has been reworded to include exceptional reasons</p>
<p>37–38 The Policy focuses on the negative impacts of increased gambling opportunities on vulnerable groups. We would like to draw attention to the increasing evidence that gambling harms can affect anyone and are not exclusive to the particular groups of people. This is especially the case in the current cost-of-living crisis, which is likely to see more people engage in gambling as a means to make money. GambleAware has recently reported, for example, that one in four (24%) of women aged 18-49 who gamble expect to gamble more in the coming months due to the cost-of-living crisis, with one in ten (12%) reportedly already having turned to gambling in an attempt to supplement household income.² Only some of these women will be from the “vulnerable” groups identified in the Policy.</p>	<p>The definition of vulnerable people in of protection from gambling harms has been extended</p>
<p>42 Additional premises to be taken into account during license applications should be:</p> <ul style="list-style-type: none"> • Banks and ATMs • Pawn shops • Cash converters • Fast-food outlets 	<p>These premises have been included in the list to be considered in an applicant’s</p>

² <https://www.begambleaware.org/news/cost-living-crisis-could-lead-worrying-growth-gambling-harms-among-women>

	risk assessment
44 The highest management standards within the gambling industry transcend the prevention of gambling-related crime and disorder and the protection of children and vulnerable persons. Betknowmore UK offers Safer Gambling training to gambling operators and we have previously worked within Islington's betting shops to ensure prevention of harm in the borough. Management standards should include high-quality and regular training of all staff, the ability to recognise and address gambling harms and preventative measures targeted at all people, and not just those who are vulnerable.	Appendix 2 has been revised to contain a list of model licence conditions that could be appropriate for gambling premises. This includes staff induction and refresher training requirements
46 Lone working within gambling premises should not be permitted under any circumstances, and not just at key points during the day or when a spike in crime is most likely. This will help ensure the safety of staff as well as facilitate their ability to prevent and address gambling harms.	The section has been reworded and a new model condition included in appendix 2.
49–51 Crime and disorder are just two of the harms that may result from gambling. Barking and Dagenham Council estimates the costs of gambling harms to the borough as between £800,000 to £2.2 million annually. ³ This includes costs related to homelessness, suicide and mental ill-health, physical ill-health, loss of work and other gambling harms. A narrow focus on crime and disorder and the protection of children and vulnerable persons will not lead to a significant reduction in the cost of gambling harms within the borough of Islington.	Noted
53–55 There should be a recognition in the Policy that in some premises, such as pubs, self-barring schemes do not apply. In these environments, landlords should be required to put in place measures to ensure that people experiencing gambling harms and children cannot access FOBTs. Those who self-exclude from gambling premises should be offered support, not just from local charities and services but from the Council itself, with adult social care services becoming involved when necessary.	The council recognises that there are limitations, especially in relation control measures relating to gambling

³ London Councils (2018) A 'Whole Council' Approach to Gambling: A guide for public health and other council officers to support the revision of borough statements of policy.
<https://www.londoncouncils.gov.uk/sites/default/files/Gambling%20and%20Public%20Health.pdf>

	machines in pubs as the majority of premises are only required to notify the council that they are providing gambling machine.
<p>Part 4</p> <p>58 Gaming Machine Permits should be required for all premises licensed to sell alcohol, and not just those with more than two machines. Given the inability to self-bar from such machines and the greater challenges of their supervision by staff (who may not receive training in how to identify and address gambling harms), all such premises should require a Gaming Machine Permit, regardless of the number of machines they possess.</p>	This suggestion requires an amendment to the Gambling Act and is therefore outside the scope of the Gambling Premises Licensing Policy
<p>59 Premises licensed to sell alcohol should be required to ensure their staff undergo training, for example suicide prevention training and Safer Gambling training.</p>	The council can only impose conditions requiring staff training on safer gambling and suicide prevention on gambling premises licences
<p>Appendix 1 Local Area Profile</p> <p>13–21 Crime figures should explicitly state that these are “reported crimes”. The number of actual crimes and incidents of anti-social behaviour in and around gambling premises is likely to be much higher than those reported.</p>	New paragraph covering this pointed included in the revised draft policy
<p>Appendix 2 Best Practice</p> <p>1–2 Best practice with regard to information should go beyond collecting data on the incidence and handing of data on problem</p>	This suggestion is outside the

<p>gambling. This is an opportunity for Islington Council to establish a database on gambling harms in all its forms. The Council, for example, could access data from the MOSES self-exclusion scheme as well as GAMSTOP (through a post-code search). Local authorities generally have poor data on gambling harms. Islington Council could establish best practice in this area. Betknowmore UK would be happy to support this endeavour.</p>	<p>scope of the council's Gambling Act functions however it is keen to explore this as a best practice suggestion and would welcome the support of Betnomore as well gambling businesses operating in the borough</p>
<p>3 The phrase "promote responsible gambling" does not reflect current language used. "Safer gambling" is the phrase that is now recognised as best practice and that does not stigmatise the gambler. Measures to ensure customer-facing and management staff know how to prevent as well as address gambling harms among <i>all</i> their customers should include:</p> <ul style="list-style-type: none"> • Comprehensive and regular training, with the content and timing of training overseen by the licensing team to ensure that it is of an excellent standard. Betknowmore UK can offer industry-leading in-person training to the staff of gambling premises, and to relevant Council staff too, as well as probation, police and prison (HMP Pentonville) staff. • Betwatch offers an opportunity to embrace a whole-population partnership approach, so that efforts to reduce gambling harms do not sit with the licensing team and Police alone. Betknowmore UK would be keen to work with the Council to establish a new Betwatch scheme as an ideal forum for wide stakeholder engagement. 	<p>The changes have been made to the revised draft policy</p> <p>All reference to 'responsible gambling' replaced by 'safer gambling'</p> <p>Best Practice has been replaced by suggested 'model conditions'</p>
<ul style="list-style-type: none"> • The Policy does not mention the National Strategy to Reduce Gambling Harms. The Policy should be cited within this framework. Also, the Policy does not mention the National Gambling Treatment Service, through which people experiencing harms can access free support and treatment. 	<p>The revised draft policy includes a new reference section</p>

