



COUNCIL MEETING - 8 DECEMBER 2022

Councillors of the London Borough of Islington are summoned to attend a meeting of the Council to be held in the Council Chamber, Town Hall, Upper Street, N1 2UD on **8 December 2022 at 7.30 pm.**

Chief Executive

AGENDA

	Page
1. Minutes	1 - 32
The Minutes of the previous meeting held on 22 September 2022.	
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.

3. Mayoral Announcements

- (i) Apologies
- (ii) Order of business
- (iii) Declaration of discussion items
- (iv) Mayor's announcements
- (v) Length of speeches

4. Leader's Announcements

- The Leader will address the Council
- The Leader of the Opposition will then be invited to respond

5. Petitions

6.	Questions from Members of the Public	33 - 34
7.	Questions from Members of the Council	35 - 38
8.	Council Tax Support Scheme 2023/24	39 - 74
9.	Mid-Year Treasury Report	75 - 90
10.	Statement of Licensing Policy 2023-27	91 - 184
11.	Statement of Gambling Policy 2023-27	185 - 246
12.	Grant of Dispensation	247 - 250
13.	Constitution Report	TO FOLLOW

- | | | |
|-----|--|-----------|
| 14. | Chief Whip's Report | TO FOLLOW |
| 15. | Notices of Motion | 251 - 258 |
| | 1. Gambling Act Review | |
| | 2. Right to Food | |
| | 3. Solidarity with striking workers | |
| | 4. Gypsy, Roma and Traveller Accommodation Needs | |

Where a motion concerns an executive function, nothing passed can be actioned until approved by the Executive or an officer with the relevant delegated power.

Enquiries to : Jonathan Moore
Tel : 020 7527 3308
E-mail : democracy@islington.gov.uk
Despatched : 30 November 2022

This page is intentionally left blank

LONDON BOROUGH OF ISLINGTON

COUNCIL MEETING - 22 SEPTEMBER 2022

MINUTES OF PROCEEDINGS

At the meeting of the Council held at Council Chamber, Town Hall, Upper Street, N1 2UD on 22 September 2022 at 7.30 pm.

Present:

Bell-Bradford	Hyde	Russell
Bossmann-Quarshie	Ibrahim	Spall
Burgess	Jackson	Turan
Champion	Jeapes	Ward
Chapman	Khondoker	Williamson
Chowdhury	Khurana	Woolf
Clarke	Mackmurdie	Weekes
Comer-Schwartz	Nathan	
Convery	Ngongo	
Gill	North	
Graham	O'Halloran	
Heather	O'Sullivan	

The Mayor (Councillor Marian Spall) in the Chair

199 MINUTES

RESOLVED:

That the minutes of the previous meeting held on 30 June 2022 be agreed as a correct record and the Chair be authorised to sign them.

200 DECLARATIONS OF INTEREST

None.

201 MAYORAL ANNOUNCEMENTS

(i) Apologies

Apologies were received from Councillors Gallagher, Kay, Klute, Poyser, Shaikh and Wayne.

(ii) Order of Business

No changes were proposed to the order of business.

(iii) Declaration of Discussion Items

No items were declared.

(iv) Mayor's Announcements

The Mayor said that it had been a very busy few months, during which she had been particularly proud to celebrate the achievements of our local residents and organisations. This has included attending awards ceremonies for the 329 (Finsbury) Squadron Air Cadets and also for young people in Islington who have graduated from Chance UK's mentoring programme.

The Mayor had also congratulated Fatima Makalo, who works at Bridgeside Lodge, on being recognised with The Chief Nursing Officer Silver Award and the Octopus Community Network who were recently given a Queens Award for Volunteering.

However, a summer of celebration had turned into a September of deep reflection due to the death of Her late Majesty Elizabeth II and the accession of King Charles III. The Mayor reflected on the life of Her late Majesty and said she would be remembered with affection and gratitude for her unwavering devotion to our country. The Mayor had, on behalf of the borough, extended her deepest condolences to the Royal Family, and sent her very best wishes to King Charles III on his accession to the throne.

(v) Length of Speeches

The Mayor reminded all councillors to take note of the timer and stay within the permitted length for speeches.

The Mayor also reminded all present that the meeting was being webcast live on the council's website.

202 LEADER'S ANNOUNCEMENTS

The Leader expressed her sadness at the passing of her late majesty Queen Elizabeth II, and welcomed the accession of King Charles III. The Leader had met the King following the Finsbury Park terror attack and his support at such a difficult time was appreciated. The Leader also thanked the Mayor for leading the Council through the recent events to mark the Queen's passing and the proclamation of the new King. The Leader was proud to stand with so many Islington residents at these important events over the last couple of weeks.

The Leader was delighted to join the Mayor at the reception in recognition of the Octopus Community Network's Queen's Award for Voluntary Service. This was in

recognition of their work during the Covid-19 pandemic, but the Leader also noted the vital work of the organisation to support local people with the cost of living crisis.

The Leader commented on the cost of living crisis, noting the government's role in the crisis through inaction and austerity. The Council's budget had been cut by £171,000,000 since 2010, and the removal of the universal credit uplift, failure to implement a real living wage, no serious attempt to stop the reliance on fossil fuels, and a hard Brexit which had restricted supply chains and increased inflation had contributed to the current challenging situation.

The Council was doing all it could to support people, despite the lack of support from central government, including allocating £676,000 into cutting council tax bills for those on lower incomes, quadrupling the size of the childcare bursary to support people back into work, protecting free school meals for all primary school children, retaining the school uniform grant, helping 5,000 people into good jobs over the next five years, and encouraging more local businesses to pay a real London living wage. Meanwhile, the government was prioritising tax cuts to the richest in our society.

The Leader called on the government to increase universal credit payments in line with inflation, invest in retro-fitting homes to help people with their energy bills, provide support for local businesses to protect local jobs and high streets, implement rent controls, and invest in renewable energy so we are not put in this situation again.

The Leader of the Opposition responded and shared her own reflections on the passing of Queen Elizabeth II. The Leader of the Opposition noted the huge volunteer and policing operations to keep the public safe during events connected to the funeral and accession, however expressed concern at some police tactics to prevent protest, including the police challenging people holding blank sheets of paper.

The Leader of the Opposition had attended a protest outside New Scotland Yard following the fatal shooting of Chris Kaba by a police officer. This has been portrayed by Sky News as mourners heading to Buckingham Palace rather than people standing with the family of Chris Kaba in seeking answers from the Metropolitan Police.

The Leader of the Opposition was glad that Islington had continued to hold scrutiny meetings through the 10 day mourning period, particularly given the current economic crisis and the need to protect residents and businesses. The country was already facing soaring inflation due to the fallout from leaving the European Union and the economic impact of the pandemic. The war in Ukraine and government inaction posed an additional challenge, and there was a clear need for every part of the council to work effectively together in response to the crisis.

The Leader of the Opposition thanked the officers who were working on the site allocation consultation for Gypsy and Traveller sites, for their help with responding to large volumes of correspondence, and for their speed in covering up racist graffiti that was sadly painted on the gates to the proposed site.

The Leader of the Opposition reflected on the terrible fatal stabbing of Deshaun James Tuitt in Highbury Fields in August and noted the thoughtful and collaborative

way that Councillor Woolf and officers worked with local ward councillors during that time. The Leader of the Opposition also thanked the gardening volunteers in Highbury Fields who had carefully looked after the flowers that had been left by family, friends and many local residents.

203 PETITIONS

The Council received a petition from Marie Hamon-Smith asking for a zebra crossing to be installed on Thorpedale Road.

204 QUESTIONS FROM MEMBERS OF THE PUBLIC

Question (a) from Rebekah Kelly to Cllr Woolf, Executive Member for Community Safety:

Between July and December last year, Islington Council ran the Safer Spaces consultation. I believe there was an insufficient amount of publicity and promotion to call it the largest community safety consultation of its kind. The results were broadcast in a series of community events at which the former Executive Member for Community Safety presented the Safe Haven scheme and stated the results of the consultation would be published and available, although I'm struggling to find evidence of this publication so am dubious of its existence.

Will the newly appointed Executive Member for Community Safety continue the Safe Haven scheme, working with communities to make the scheme effective, and actually hear our concerns?

Response:

Thank you very much Rebecca for your question and the very short answer is yes and yes to both. If I can elaborate slightly further I'd like to start by putting on record my thanks to the predecessor in my role Sue Lukes who did so much great work to make Islington a safer place for all.

We know that community insight into crime is an essential component of any community safety strategy and therefore the Council set out to listen to residents, partners and businesses to ensure that we understood the different experiences of crime, perceptions of safety, broader community insights, priorities and community aspirations for a safer for borough.

With this in mind from July to December last year the Council initiated work to address these concerns locally by consulting on a five-year violence reduction strategy, as well as running the safer places campaign. The safer spaces consultation was the largest community safety engagement programme in the country last year. I know you said that you believe there might have been insufficient publicity or promotion but the Council did write to every household and business individually, to get their views on what could be done to improve the local area.

In addition, we also held a Violence Reduction public launch event at Islington Assembly rooms with over 100 people in attendance, attended 19 library and community centre events, joined 8 virtual partnership meetings, convened 30

community led discussions, in conjunction with the voluntary and community sector, as well as parent champions, and developed an online reporting platform which received 1,700 public responses.

We are proud that a Labour run Council, through its wider Safer Islington Partnership, has been the first borough in London to undertake such consultation. Our approach is being adopted by other London boroughs with the work recognised as best practice.

The information we received from this consultation directly fed into the Council's five-year violence reduction strategy, as well as making sure that we were listening and responding to those issues raised. We look forward to continuing to work with local people to ensure we are making Islington the safe place for all. Thank you for your question.

Supplementary question:

Thank you for your reply. I was part of the formal consultation last year. I believe there were 100 thousand leaflets produced. I didn't get one. My road didn't get one. In fact, I got in touch with the Community Safety Team and collected 200 to distribute in our ward of Canonbury. I put them up in blocks where there had recently been burglaries. I attended the public engagement sessions where my views were disregarded, particularly about the Safe Haven scheme. When I walk through my low traffic neighbourhood there is no safe haven scheme for me then. What really concerned me about that consultation with the low participation of children and young people and that not one respondent who was under 18 said that they felt safe in Islington, so what can we do to improve their participation and make young people feel safe? Obviously, we had these community engagement events and with the slideshows there was a lot of information to take in at once. I was promised that these would be put into a report to be distributed and I can't find them anywhere and I don't believe they have been distributed. If it was the biggest safety consultation in the country, what are we going to do with the results?

Response:

Thank you very much for your question Rebecca. As I said, it was the largest consultation in the country. I don't need to repeat the answers. I think in terms of the Safe Haven scheme we're looking at trebling the numbers and are going from 100 to 300 across the borough. What we're doing with the results from the Safer Spaces consultation, is going through those analysing them and then tasking our resources to particular areas and hotspots directly informed by what local people have raised with us, and this is particularly evident in certain hotspot locations around the borough.

Subsequent to that, my promise to you is that, as we're implementing the safety measures across the borough in response to the Safer spaces consultation, we will then go back to the community in the new year to say, this is what you said and this is what we've done in response. Let's continue that listening exercise and make this an ongoing conversation and dialogue with the community. I know in our ward in Canonbury we've already been in dialogue, the two of us, and I hope that that will continue, but you have my assurance that this is not the end of it. We are working on

the data now, we're implementing safety measures across the borough and will be going back out to consultation at the beginning of the new year to feedback those results. I should say we're doing that regularly at a local level as well, but you know if you have any further questions or concerns, you are always welcome to come to me. Thank you.

Question (b) from Hilary Green to Cllr Ward, Executive Member for Finance, Planning and Performance:

Is the planning department at Islington Council willing to undergo a public review of its policy on mansards, taking into consideration the complex needs and wishes of residents?

Response:

Thank you very much for your question Madam. Islington Council is committed to tackling the climate emergency by achieving net zero carbon emissions by 2030.

You correctly identify that the planning policies are a key mechanism for achieving this goal, with our draft Local Plan setting out some of the most ambitious net zero carbon and sustainability policies in London.

The Council is currently working on a supplementary planning document (SPD) to set out in detail how the Council's net zero carbon planning policies can be delivered. This will include clear guidance for local residents and businesses who want to install carbon reduction measures in their buildings, including listed buildings and conservation areas. This guidance will be based upon up-to-date technical evidence relating to specific types of buildings in Islington and the SPD will be subject to two rounds of public consultation.

Once this has been developed the council will examine whether any changes are needed to the Islington Urban Design Guide and Conservation Area guidelines to ensure that they better support our net zero carbon objective. Any review of this will, of course, be based on clear technical evidence and any changes to policy will be subject to statutory procedures including consultation with local people and local organisations.

In the coming months the Council will focus on the adoption of its Local Plan. The policies set out in the plan are crucial to building a fairer Islington by delivering desperately needed genuinely affordable housing, supporting an inclusive economy and achieving net zero carbon emissions by 2030. Thank you very much again for your question.

Supplementary question:

Thank you for your considered reply. My initial question, however, was actually in regards to policy on mansards specifically in Islington. The question, if I may read it, was 'Is the planning department at Islington Council willing to undergo a public review of its policy on mansards, taking into consideration the complex needs and wishes of its residents?' so I appreciate what you've said about sustainability environmental

concerns and that is certainly a part of it, but it's not getting to the heart of the question.

Response:

Thank you very much Madam, I did say that the Council will examine whether any changes are needed to the Islington Urban Design Guide and the Conservation Area Guidelines and both of those things are part and parcel to the heart of what you're saying on the specific issue of mansards, so the answer is that we are specifically looking at the planning policies which relate to mansards.

Question (c) from Max Campbell to Cllr Ngongo, Executive Member for Children, Young People and Families:

Islington Boat Club provides vital services to the whole community from children, young people, the older generation and those with Special Educational Needs. Its closure over this summer has had a devastating effect.

In the last Council meeting in June, the Executive Member for Children, Young People and Families stated that "Islington Boat Club has been closed due to failing a health and safety audit and needs significant repairs". However, upon investigation it seems that redevelopment was highlighted in Site Allocation from 2019. Why hasn't the Council helped more to keep the Boat Club open?

Response:

Max Campbell was not present in the Chamber and a written response was sent, as follows:

I agree that Islington Boat Club provides important services to local people and the Council is completely committed to ensure its activities are retained. However, it is important to note that the Boat Club is not a Council service and is run by a third party.

Following concerns about the state of repair across the boat club site, the council commissioned an independent building condition survey. The results revealed substantial disrepair and health and safety issues as well as other breaches of tenancy obligations. It is the Boat Club's responsibility to ensure the premises are safe to operate, and following consultation with the Boat Club, it made the decision to close the site as it was not in a position to safely reopen the site.

The Boat Club's lease expires in December 2022 and will be writing to them in the near future to consider next steps.

The Council wants a thriving, inclusive boat club providing water-based leisure and sports opportunities for Islington's residents. We are potentially willing to grant a new lease to support these ambitions, but it needs a robust, financially sustainable and locally rooted organisation in place with the ability to raise the funds needed to deliver new facilities. Thank you very much again for your question

Question (d) from Helena Farstad to Cllr Ward, Executive Member for Finance, Planning and Performance:

As part of the Dixon Clark Court negotiation process (when the site was occupied by tree protectors), one of the conditions for leaving the site was that Islington Council would hold a Citizen's Assembly on the Environmental Emergency in Islington. While not defined the idea was to focus on how to address the Housing Crisis in Islington alongside achieving the commitment of Net Zero Carbon by 2030.

The agreement was signed on 21st October 2020 and the occupation of which negotiation parties belonged, then ceased. Since that point, several attempts to get a confirmation on when such a Citizen's Assembly should be held has taken place. The Councillor has not yet responded providing any clarity on the matter and already two years have passed.

Is the Councillor intending to hold this promise, and if so, when will they deliver on it?

Response:

Thank you very much for your question. Islington's Labour run Council is focused on tackling the Tory housing crisis, which has led to a housing waiting list of 19,000 people and the climate emergency, which we're seeing the effects of more and more every year.

The Dixon Clark Court development is very important for our borough; building brand new, genuinely affordable Council homes for local people, whilst also increasing the amount of trees and greenery on the site. We agreed to a minimum of 63 new trees being planted in Dixon Clarke Court and around other sites in the Borough; a mix of small medium and large species and a range of habitats.

Sadly the occupation didn't end as planned and many of the people who had been occupying the site, including members of your negotiating team, continued to take part in the subsequent occupation. As you are aware, we would have been able to plant even more trees, if we hadn't spent so much money on legal costs. We did agree to that and sadly that didn't happen because we had to use legal means to regain the site.

Nevertheless, we, as a Council, have chosen to honour the agreement of Extinction Rebellion Islington because we think is the right thing to do for our borough. The Council is determined to work with people from across the borough to achieve our goal of net zero carbon by 2030 and as part of this, in October 2021 we held our Let's Talk About a Greener Future festival, which involved around 100 events over two weeks and was an important opportunity to raise the profile of the Council's work on net zero. One of the events was the Housing and Environmental Assembly. I was on paternity leave suddenly, but my colleague Rowena Champion was in attendance at the event. I understand you didn't attend which I was a bit disappointed about, but our approach to delivering net zero carbon homes in our new build programme and investment in our existing homes, as well as the steps private homeowners and businesses need to take to keep their carbon footprint down and what support and advice is available were all covered. We held the event as a hybrid event to be able

people to attend online, or in person, at socially distanced venues with workshops. A great number of ideas came from that event and they have steered our work since. I'd love to have more those events – it was great.

Subsequent to the festival we have had a major borough-wide engagement on equality called Let's Talk Islington and housing emerged as a key priority for residents during this process. We continue to make new, net zero carbon, genuinely affordable homes a priority, as well as investing in our existing homes to reduce the carbon footprint and energy consumption. The council is keen to continue working with residents across the borough to tackle housing, climate change and the cost of living emergencies.

Supplementary question:

Thank you very much for your answer Councillor Ward, but this question was specifically on Citizens' Assemblies. You know because it has been discussed in some detail that there is a specific definition of a Citizens' Assembly. What you described in your comprehensive answer was not a Citizens' Assembly by that definition. I am asking if you will deliver a Citizen's Assembly on the climate emergency, perhaps with a specific focus on the housing crisis, as discussed and, if you are going to honour your commitment and your promise, when that will be? Thank you very much.

Response:

Thank you very much for your supplementary question. Could I ask you to reflect on what you're saying this evening. Your group held what you describe as a People's Assembly at the site of the occupation. That People's Assembly voted to end the occupation, but many of the people who attended the Assembly and members of your group actually chose to ignore that and didn't end the occupation, they continued to occupy, including a member of your negotiating team.

So I would ask you, if Extinction Rebellion have got strict definitions of a People's Assembly and Citizens' Assemblies, I'm not sure they're actually quite effective. We haven't done this kind of engagement before but we are very, very keen to and we're keen to work with you on further assemblies, but I don't accept the kind of the strict prescriptive definition that Extinction Rebellion have. I think we have honoured the agreements but we're happy to continue to work with you and to continue to honour agreements. Thank you.

Question (e) from Leyla Boulton to Cllr Ward, Executive Member for Finance, Planning and Performance:

The UK has signed the Paris Accord on climate change and enshrined its objective of carbon neutrality in law. Now, the double whammy of soaring energy bills and Russia's use of gas as a weapon of economic warfare make the development of renewables and increasing energy efficiency more urgent than ever before.

Islington's grade 2 listed properties are numerous and among the most energy-inefficient in the borough. Yet current planning regulations are preventing the

landlords, tenants and residents of such homes from taking steps to radically reduce their carbon footprint, including the installation of solar panels and double-glazing.

For instance, a resident who installed sensitive double-glazing that is invisible from the street has been refused planning permission while secondary glazing on a neighbour's house, which is visible from the street, is allowed. Listed homes were mostly discouraged from joining the Mayor's now-closed Solar Together scheme on the grounds they would not get planning permission from Islington Council.

Councils such as Kensington & Chelsea are adapting their planning rules to help. With its strong record on the need to tackle climate change, will Islington Council quickly change planning regulations to facilitate the installation of solar panels and double-glazing on grade 2 listed homes and help make street properties in Islington warmer in winter and more affordable to heat for all tenants and residents?

Response:

Thank you very much for your question. Islington Council is, as I've said committed to tackling the climate emergency by achieving net zero carbon emissions by 2030. The Council's planning policies are a key mechanism for achieving this goal, with our draft Local Plan setting out some of the most ambitious net zero carbon and sustainability policies in London.

Many measures to reduce carbon emissions do not need planning permission as they are considered to be permitted development. There are however important exceptions set out in national planning policy. These exceptions include listed buildings. The installation of many carbon reduction measures on listed building are not considered to be permitted development and would therefore require planning permission and listed building consent. There is nothing in the Council's planning policies that specifically prohibit these measures on listed buildings, for example the Planning and Development Service has approved applications for solar panels on listed Buildings in the borough.

In making decisions on carbon reduction measures on listed buildings the council's planning department is obliged to apply the statutory national policy test. This involves weighing the possible harm to the listed building, or conservation area, against the public benefits that may include a reduction in carbon emissions. As mentioned in a previous answer, the council is currently working on a supplementary planning document to set out the detail of how the Council's net zero carbon policies can be delivered. This will include clear guidance to local residents and businesses who want to install carbon reduction measures in their buildings, listed building and conservation areas. This guidance will be based on up-to-date technical evidence relating to the specific types of buildings in Islington. As I've said earlier, the supplementary planning document will be subject to two rounds of public consultation.

We are of course aware of the approach taken by Kensington and Chelsea and will contact them to find out how well that approach is working there. You provided with specific details of the case of that you refer to in your question to me and I'm very

happy to look into this and ask a planning officer to respond to you in detail. Thank you very much again for your question.

Supplementary question:

Thank you Councillor Ward. The Council tonight has reminded us of its intention to tackle the cost of living crisis which is urgent, as the winter looms, my question is how quickly do you envisage making the changes you speak about tonight and whom can I stay in touch with to follow progress?

Response:

Me. Very, very happy to talk to you about this over the phone or by e-mail. I'll also involve an absolutely wonderful planning team who will be happy to keep you updated.

Question (f) from Lucy Facer to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

100% of Islington exceeds the World Health Organisation's (WHO) air quality guidelines. The guidelines provide evidenced, health-based standards that cities should adopt. Last year, an estimated 74 people in Islington died from diseases caused by air pollution.

There is far-reaching evidence that shows how air pollution affects many aspects of health, even at low levels. Air pollution particles reach unborn babies through the placenta and children are being exposed daily to unsafe levels of air pollution on their journeys to school, the park or the local library.

Islington Clean Air Parents would like to know does the council have a comprehensive plan for the borough to meet WHO's air quality guidelines?

Response:

Lucy Facer was not present in the Chamber and a written response was sent, as follows:

Before I answer the question, I would just like to say that I am pleased that the Air Quality report we published shows that there continues to be a significant improvement in air quality in Islington. However we know that air pollution even at the current levels remain a serious threat to public health resulting in premature deaths and ill health. Recent research only make this more apparent.

In recent years, we have implemented a number of measures including School Streets, people-friendly streets, air quality monitors at schools, providing more space for walking and cycling, planting hundreds of new trees, and much more. Measures such as the Mayor of London's ultra low emission zone have also made a big difference. Continuing measures we are taking to tackle the primary sources such as from motor transport remains vital as it moving towards a net zero carbon Islington with the replacement of polluting sources such as gas boilers.

In relation to the specific question about the new WHO guidelines which were updated in 2021. In short. No, we do not yet have a comprehensive plan.

Work is going on. Over the next year the council is reviewing our Air Quality Strategy, and the new WHO guideline levels and interim targets will be very much part of this. It is fair to say that the new levels, particularly in relation to pollutants giving rise to PM2.5 or fine particulate matter, which are particularly damaging to health, are very very challenging.

As you know PM2.5 pollution is very complex, and comes from natural sources, such as from salt spray, soil, volcanic eruptions, Saharan sand etc, as well as sources over which we have some control, transport, energy, industry, and homes. It can also form in the air from complex chemical reactions involving other pollutants, like ammonia from agriculture or organic chemicals from domestic products, and remains in the atmosphere for weeks at a time and drift between nations so a concerted global effort is required and even national regulations, long with regional and local efforts may not necessarily on their own reduce pollution far enough to meet the limit set at 5µg/m³. It is for reasons such as this that 99% of the world's population live in areas over the WHO guideline levels in this regard.

Recent studies from organisations such as the Clean Air Fund and Imperial College London show that achieving air quality within the World Health Organization's interim target for fine particulate matter (PM2.5) of 10µg/m³ (WHO-10) is possible across most of the UK by 2030, if current and proposed government policies related to net zero and air pollution are implemented in full.

In relation to nitrogen dioxide more confident there is a clear pathway, if clean technologies work as hoped, and the implementation of net zero progresses at pace, this is something that we think can be achieved in Islington. But it is dependent on the pace at which, for example gas heating and cooking systems are replaced by clean technology.

Saying all that it does not mean for one minute that we should not do all we can to try and come up with a pathway to meet the goals. We are really happy to continue working with ICAP on what is such an environmental risk to human health.

Question (g) from Zak Vora to Cllr Ward, Executive Member for Finance, Planning and Performance:

Islington Council have once again failed to conduct adequate consultation, this time with the residents of Braitwaite House and Quaker Court, the residents most directly impacted by any potential development on the Podium and surrounding area behind Braithwaite House on Bunhill Row. Will the Council commit to a full and thorough consultation with defined thresholds for objections to nullify plans and, if it somehow passes these thresholds, commit to all properties being offered for social housing given the desperate need for such confirmed by the Council itself?

Response:

Thank you very much for your question Mr. Vora. You're still continuing your campaign against building council homes in the borough. I can confirm there is a defined set of thresholds that can be used in this instance and we have used those thresholds in poll was held on the 5th of May 2022. The results were as follows Valerie Bossman-Quarshie, 1,277, Troy Gallagher, 1,174, Phil Graham, 1,057, Zak Vora, 337. You and the Tory party's long campaign against council housing for families in desperate need in Islington has failed Mr. Vora. It's been rejected by the residents of Bunhill. You know there's a housing crisis here caused by over 12 years of a Tory government which not only fails to build enough homes, it stops us from building homes as well. It actively stops us from building homes.

We only get a third grant for every home and the government makes us sell homes under Right to Buy, then the Treasury take some of the money and tells us how we can spend our own money. The Council has been consulting residents in these blocks about proposals to build homes since 2016 and it's helped shape the proposals. We're now finalising the planning submission to deliver 44 homes, over half of which will be council homes for local residents on the estate in desperate need.

Residents have a further chance to have their say on the proposals as part of the statutory planning consultation and all the responses are reviewed and assessed by our Planning Committee. You've been Planning Committee and you know our Planning Committee are not a pushover. These schemes are all gone through with a fine tooth comb by our Planning Committee. Local people will continue to have a voice throughout the development process and if the plans are approved will be seeking views on landscaping play areas, planting, as well as 'Meet the Contractor' in due course, to discuss how these works are managed to minimise any disruption.

We would build 100% council housing on every site. Sadly, Mr. Vora, your rotten Tory government makes that impossible. £271 million pounds we've lost since 2010. If Mr. Vora would like to have a word with his new Tory leader to get her down here, families are in desperate need of council homes. We will tell her what we need, we need new council homes for local people Mr Vora. Thank you for your question.

Supplementary question:

Thank you so much for spending most of your time just having a dig at the Conservatives without actually answering most of the questions which were bought to you. Firstly, will you have a threshold with regards to residents, where their objections will actually register with the Council and you will not go ahead with the planned permission. With regards to the fact that that you boast so well about trying to build and also question the merits of this council, claimed by your Leader to be on the side of local residents, why is it when a historical site at Junctions station was torn down, it was sold by the Council to private developers just so that the threshold for properties to be developed went all for private and none for residential. How, with regards to the development at the Holloway Prison the terms were changed after signing in favour of Peabody to have more for private sale as opposed to social housing. How is it on Windsor Road with a development for 11 residents, the costs have gone up from £2M to £8M without even doing anything? This is incompetence on the terms of the Council and the Labour Council that has been in charge for well

over a decade. At Netnet we are having residents at Braithwaite House and Quaker Court suffer from your incompetence and mismanagement of housing stock and the manner in which things are being conducted.

Response:

Have a word with yourself Mr Vora. I am proud of all of my brilliant colleagues at the Council, who ensured that there were 60% genuinely affordable homes on the Holloway site, including 42% for social rent. In the meanwhile your mates in the Tory government came in to see us and said 'No you can't do this, you can't put in this Supplementary Planning document which talks about at least 50 percent genuinely affordable'. We said 'Yes we can' we are the local planning authority

Every step of the way when we try to build social rent homes and council homes, we are faced by your government, your party, stacking the deck against us. I have been to the drop ins at Braithwaite and Quaker about the new build. I'm proud that I was there with my colleague Councillor Bossman-Quarshie, listening to residents. Every month at our surgeries we get families in desperate need of a council home. If you want to continue your Tory rotten campaign against council homes, be my guest, but I know that Councillor Bossman-Quarshie, Councillor Gallaher and Councillor Phil Graham, of course, will be there to oppose you every step of the way with the strong, huge mandate they have from the people of Bunhill. Thank you.

Question (h) from Claire Davies to Cllr Ward, Executive Member for Finance, Planning and Performance:

Regarding the proposed redevelopment of the Banner Estate (Braithwaite house and Quaker Court EC1Y) for Private and social housing-

What steps have been take to fully investigate nearby alternative sites for redevelopment, namely the properties and sites in close proximity to the already densely populated Banner Estate, that have been left vacant, empty and disused for numerous years and could be feasible for compulsory purchase? For example the site at Oliver's Yard on City Road.

Response:

Thank you very much for your question Miss Davies. As I have said in my previous answer, for the past 12 years the Tory government has created a housing crisis in our borough and we're doing everything we can tackle the housing crisis. Were focused on building as many new genuinely affordable homes for local people as possible and we're always looking for potential sites.

As I've said, Cllr Bossman-Quarshie, Graham and Gallagher will tell you all about the families who come to their surgery in Bunhill in desperate need of a home. The capacity for existing estates to accommodate further homes is carefully assessed and the density you refer to is also reviewed by the local authority with standards protected by planning policy.

The Council does seek to acquire a new land and buildings where it's possible to do so and it regularly engages in with other public sector partners such as the NHS, the GLA and central government to look for new sites for development.

I'm sorry to say that this idea that we can just compulsory purchase a piece of land because it's not being used is not accurate. Believe me, if we could acquire every unused piece of land and every unused building in the borough and convert them into council housing, if we had that power to do that, this borough would be a very different place. I genuinely want to say that, if we had the power, we would do it every step of the way and work with you as well.

In some limited circumstances the Council does acquire land or buildings through compulsory purchase but the Secretary of State has to approve it and we have to pay market rates and would have to pay compensation to affected landowners as well. As you've just heard that we only actually get one third of the cost of a new council home in the grant regime brought in by this government, but we will continue to look at all possible sites in the borough to build genuinely affordable homes for local people and tackle the Tory housing crisis.

I do encourage residents like yourself to come to me every step of the way. If you find a bit a bit of the council land you think could be used better, come to me. We are always on the look-out for bigger and better sites to build council homes for families in genuine need. Thank you.

Supplementary question:

I understand that you're doing your best to solve the social housing problem. As a social housing resident myself, I very much appreciate that. I think most people that live in Braithwaite House and Quaker Court, a large percentage of them are social housing residents and we encourage new social housing. However, it seems like the budget which had been estimated at the beginning of the year as approximately £30M for this redevelopment, seems a very high cost given the fact there's just 24 suggested council houses / apartments / affordable housing that's going come out of it. There seems to be a large percentage of the build is going to be private. I understand that's going to fund the social housing, however, it still seems like a high cost.

I understand that the Council is in the process of trying to improve recycling, looking at ways of using things again, looking at the cost of living crisis. Surely £30M in the grand scheme of things, for 24 social houses, is a massive, huge undertaking given at this point in time where contractors can't be guaranteed in terms of their costs and expenditure, loans and borrowing is increasing, no cost can be estimated, how can you even guarantee that the cost that you estimated back in in in March or last year, whenever that was prepared, is even applicable now, as so much has changed over the last 2,3, 4 months.

Response:

We can't guarantee that money. That's the sad reality of it. This Tory cost of living crisis has thrown inflation through the roof and the entire building industry is in disarray. As I've said, we do have to build some private homes because we just don't

get the funding from the government. We only get the funding for a third of each home and when the government makes us sell off homes, they actually pocket some of the money. So the position is that we have to get the rest of the money through borrowing and building some private homes; that's the way we have to do it. But I absolutely agree with you that this is a very, very uncertain market and there are unique challenges to our council housing programme. We've pledged to build 750 council homes by 2026 and that's part of a programme of 1,550 genuinely affordable homes by 2026. It's going to be challenging but hold me to that. Come back here in April 2026 and even before, hold me to that because, even in these challenging times, we owe it to families who are in desperate need here in our borough.

Question (j) from Pete Gilman to Cllr O'Halloran, Executive Member for Homes and Communities:

As a proportion of income rents in Britain are the highest in Europe and high rents are a major cause of poverty and deprivation. There is an understandable fear among council tenants that on top of the huge rise in the price of food and fuel we will see a huge rise in council rents in Islington.

Can the council give an assurance that there will be no such rise? In addition, many housing associations operating in Islington are planning big increases in rents and service charges. Can the council give an assurance it will use its power and influence to stop and/or curb such increases?

Response:

Thank you, Pete, for your question. I completely agree that rising rents are having a severe impact on local people with private rent increasing, even further exacerbated this year by the cost of living crisis. The Council knows that socially rented homes are the fairest, most effective way of providing safe, decent housing for local people. We will continue keeping rents as low as we can to protect our much-loved Council tenants but sadly we have far less influence over private rented homes and we know this is very worrying for local people too.

We are deeply concerned about the impact the cost of living pressures are having on residents of Islington. Islington Council have increased support for residents including providing additional funding for vital crisis support, on top of the work we are doing to bring down people's energy bills by improving the energy performance of the homes we provide. The support that the government has announced for energy bills is welcome but it is clear that further assistance is urgently needed, but it is the Tory government which is stopping us going further. We want to extend our selective landlord licensing scheme to cover the whole borough ensuring better standards of homes for tenants and the Labour Mayor of London is seeking the powers to implement rent controls, capping rents at an affordable rate for people but unfortunately the Tories to continue to block both of these requests, denying private tenants the support they need.

Islington Council is here to support our residents in these difficult times and any residents who are concerned about paying the rent to Islington Council partners or housing associations or private landlords should seek advice and assistance and

support from Islington Council. And again thank you Pete for coming tonight with this question.

Supplementary question:

I just want to say, on behalf of the tenants of Islington, Council tenants and Housing Association and also private tenants, that we were very grateful for what Islington Council is doing for us. It is one of the few councils in Britain that actually represent the interests of tenants and when I say that I don't just mean that we are under attack from Tory and Lib Dem Councils, I mean some of our own Labour Councils as well are attacking tenants of all kinds, so we are very grateful for what you are doing. Big rent increases are causing real poverty and hardship for millions of people and what we are saying is that what we need in Britain is rent controls.

Response:

Thank you.

205 QUESTIONS FROM MEMBERS OF THE COUNCIL

Question (a) from Cllr Poyser to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

On 13 August 2022, at 12.10am, Police attended a serious road traffic collision outside the Shell Garage on Hornsey Rise, N19, in Hillrise Ward. Four people were injured, one with life threatening injuries. Our deepest sympathies are with the families of the victims. Obviously the incident will be investigated by the relevant authorities and blame cannot be apportioned until this has happened

Some local residents that have cars on this road drive too fast. Is there anything Islington can do to make this stretch of road safer in future?

Response:

Cllr Poyser was not present in the Chamber and a written response was sent, as follows:

I was very saddened to hear about the collision in your ward and the Council is working with the police to fully understand the circumstances surrounding it. The collision is currently still part of an active investigation by the police and we have recently attended a site meeting with them, as part of this investigation.

Whilst we wait the outcome of the police investigation, we are commissioning speed counts to understand the extent of speeding here and we will be reminding drivers of the speed limit through the installation of additional 'SLOW' and '20' mph road markings. Once we've received the final police report and speed data, we will be in a position to discuss and consider additional speed reduction measures.

As you are aware, our Labour Council is committed to reducing road danger on the borough's road networks to eliminate deaths and serious injuries by 2041 and the occurrence of other types of road collision and incident and work with the Mayor of London to achieve this.

We are clear that having fewer cars on the road, and reducing the speed of the cars that are on the road, are important aspects in making our roads safer. Our 20mph borough policy, as well as our people-friendly streets schemes, are intended to make our streets cleaner, greener and safer. I look forward to working with you and your Hillrise colleagues to make the streets safer in the ward.

Question (b) from Cllr Convery to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

On Wednesday 17 August, heavy rainfall caused "flash" flooding in Islington on Upper Street and Pentonville Road at Kings Cross seemingly worsened by blocked drains on TfL roads. In the previous week, a Thames Water mains burst on Tollington Way caused extensive damage partly exacerbated by the slow speed at which drains could remove water.

With the risk of such extreme events recurring, please will you say whether Islington's preventative programme of gully maintenance will be adjusted to ensure that further episodes of very heavy rain do not cause flooding on Borough roads and residential streets?

Response:

Can I just thank officers who attended the events mentioned in the question so quickly and particularly the emergency planning team, who we all know always do such a brilliant job in ensuring that the damage and disruption events like this are kept to a minimum and have just been very, very busy over the past few months and recent years.

There are two parts to the premise of the question. The first is the recent water main burst which has caused so much damage to homes and businesses and of course to the Sobell Centre and great distress to those affected and I think that we are both painfully aware this wasn't the only burst in the last few months which has damaged homes. Residents of Offord Road have now suffered a number of bursts in the past years and it hasn't just caused property damage, it has and continues to cause anxiety as we anticipate the next burst and the consequences thereof.

Of course, drains play some role in moving water, but a pressurised water main burst will always overwhelm the system. Responsibility firmly lies with Thames Water to invest in the network properly to make sure that bursts don't happen in the first place and I am very grateful to my colleagues on the Policy and Performance Scrutiny Committee who held Thames Water to account and to the residents who came and gave such powerful testimonies.

The second part of that is drainage more generally, which I think is the nub of your question. I absolutely agree that going forward we need to make sure that our infrastructure is able to cope with the level of rainfall we are experiencing, and we are likely to experience going forward. As you say, we are already seeing flash flooding, which is only likely to get worse, so we are looking at what we need to do to make our public run more resilient and this does include looking at whether maintenance needs to be increased. Currently, the Council has a preventative programme gully maintenance where gully pots receive twice yearly service. In addition, where water is not draining, Highways officers will investigate the reasons and will instigate remedial works where necessary, but that's of course reactive.

As part of the review we are investigating the use of sensors that are able to detect when a gully pot needs to be cleaned, using technology to maximise performance. If this is successful it would enable the Council to redirect gully maintenance to places that require more frequent cleansing.

But it is likely that whatever we do, there will be times when the drainage system is just not able to cope, so changing our public realm to make surfaces more absorbent including through greening and adding sustainable urban drainage such as rain gardens is absolutely vital to a sustainable future. Which is why I'm pleased to say that we've introduced programmes such as Islington Green Together, which is not only working with local people to create more attractive green community spaces across the borough, but will make us more resilient going forward not just in relation to rainfall but also in relation to extreme heat events, which unfortunately we also experienced this summer. Thank you.

Supplementary question:

I would like to thank Rowena for that answer. I entirely support the observations about the extraordinary hard work of our officers in dealing with these emergency bursts and I'd like to join the remarks made by many of our colleagues on Policy and Performance last week, rightly criticising Thames Water for their persistent failure to invest in the water mains infrastructure and the repeated incidences of very catastrophic bursts. Offord Road happens on average once a year and the impact down the Cally is really extensive not simply people's homes being flooded and lives being completely upended, but extensive damage to the highway. Paradoxically the fact is that a water burst isn't just erupt a large amount of water, it sends vast amounts of grit and sand down the highway thereby blocking the drains.

So as these risks persist and as Thames Water fail to invest in the infrastructure and climate instability poses greater risks, I very much welcome what you've just said and wonder whether you would agree with me that we need mechanisms to identify where risk is at the highest and we need to put in additional resourcing. The sad fact is that when these things happen, particularly Thames Water's failure, it is Islington Council that cleans up the mess. We need to make sure that we do that expeditiously and well, in order to protect our citizens from further flooding. Thank you.

Response:

I agree.

Question (c) from Cllr Gallagher to Cllr Ward, Executive Member for Finance, Planning and Performance:

The conservative government has spent 12 years making this unprecedented cost of living crisis through 12 years of deliberately planned austerity, attacking working people from all ages, backgrounds and all sectors. To add insult to this injury inflicted on normal working islingtonians and people across all of the UK, the average pay of FTSE 100 CEOs jumps by 39% - an inflation busting pay-rise which is at a rate of 109 times that of the average UK worker; energy firms make £170 billion excess profits. People are living in fear and despair at being unable to survive. Winter is coming. What can the council, our key partners and organisations do to prevent normal people from having to turn to crime to make ends meet, pay the daily bills or feed their families?

Response:

Cllr Gallagher was not present in the Chamber, it was advised that a written response would be sent. This will be appended to the minutes.

Question (d) from Cllr Gallagher to Cllr Turan, Executive Member for Health and Social Care:

Has the Executive Member received the latest up-to-date figures on male suicide and suicide in general within the London Borough of Islington? Could he share with me and members what is the strategy to tackle male suicide within the borough and to have an integrated approach across all council services and departments to address this issue and prevent the cost of living crisis becoming a cost of life crisis?

Response:

Cllr Gallagher was not present in the Chamber, it was advised that a written response would be sent. This will be appended to the minutes.

Question (e) from Cllr Jackson to Cllr Khondoker, Executive Member for Equalities, Culture and Inclusion:

Black men are 17 times more likely to develop severe mental health problems than any other group. They are also 4 times more likely to be sectioned under the Mental Health Act. These stark statistics show us a focus on mental health for Black men is more important than ever before. Can the exec member tell me their plans to tackle and ensure Young Black Men can live well and access the support they need?

Response:

Thank you for your question Jason and thank you for the work you've done on this important project. Challenging inequality and racism and injustice is at the heart of this Council's work. We recognise the profound impact of intergenerational cycles of racial injustice and inequalities affecting young black men.

We know they are 17 times more likely to be diagnosed with psychotic disorders and there are higher admission rates into secondary level care and psychiatric provision and there's a disproportionate number of exclusions from school. Equally, we know this endemic cycle is not new. Here in Islington we want to develop something that was pioneering, truly new, that could leave a lasting impact; a legacy to transform the lives of young black men.

Islington Council and the NHS were successful in receiving investment funding of £1.6M to lead a programme designed to tackle mental health inequalities, which will help to create a better future for young black boys and men and support the Council and the NHS is efforts to tackle this inequality. It's a three year programme named 'Elevate young black men and mental health' and it will see a much more holistic approach to addressing mental health issues among young black boys and men in Islington with the aims of improving personal mental health and wellbeing, aspirations and life chances.

It's got four pillars of delivery they are: the 'Becoming a man programme', a pioneering 24 month programme delivered in three secondary schools through a full time 'Becoming a man' counsellor based in each school. This is launching in three secondary schools this month already. There's also the 'Elevates' innovation hub delivering holistic and wraparound therapeutic support through a small team of community therapeutic coaches lead by a clinical psychologist. This will take on referrals and commence work with young people in October, alongside the launch of the Barbers Round Chair project, training of barbers to become Community Mental Health Ambassadors and lastly, rolling out cultural competency and anti-racist training across the workforce. We're very proud of this work that we're doing here in Islington, in creating significant shifts in thinking, approach, practice in challenging mental health inequalities for young black men, that we believe will lead to longer term system changes and greater life chances for young black men living in Islington. I am also delighted to announce a formal event to mark the launch of the 'Young black men in mental health programme' is being planned to take place in October 2022, next month. Thanks again for your question.

Question (f) from Cllr Heather to Cllr O'Halloran, Executive Member for Homes and Communities:

What action is being taken by the Council to protect renters, including private renters, in Islington amidst the cost of living crisis?

Thank you Councillor Heather for your question. You are completely right, this Tory cost of living crisis is having severe impact on Islington renters, both social and private. We are continuing to protect social rents and building more council homes for local people, as well as keeping Council rents as low as possible and investing more into our estates via the £10M thriving neighbourhoods programme, which will be launched from Monday.

While we want to get as many people into social housing as possible and as the second biggest social landlord in the country we are doing a good job, we know not

everyone can access good social housing and many are forced to rent through the private sector. Our Council is working hard to protect private renters through our landlord licensing scheme but we know more needs to be done. It is high time this government allowed the Mayor of London to introduce rent controls so we can bring down the rents. It's unfair in the private sector how high the rents are.

In the meantime, our Council is supporting private renters by providing dedicated housing advice assistance and support services for all tenants living in the private rented sector, to prevent homelessness, providing housing advice and increase financial inclusion by maximising benefits private renters are entitled to. Working with the private landlords to ensure we minimise people be made homeless from the private sector, adopting a borough-wide HMO and selective licensing scheme for landlords operating in Islington, currently undergoing expansion from Finsbury Park to Tollington and Hillrise, organising private renters focus groups and liaison meetings to help redesign our services to meet the needs of the private rented sector tenants. Working across the council to address the needs of private rented sector tenants through the cost of living crisis, providing financial assistance and support to private rented sector tenants to help access discretionary housing payments, supporting people to obtain employment through the Council's employment services, providing money advice, debt management and financial services, working with food banks and partners to address fuel poverty and food poverty, the Shine team are working to provide advice on reducing energy consumption and signposting residents to any available grants, to other council support services working with the Job Centre and the DWP to maximise the income for our residents working with private landlords.

The Mayor advised that the time to answer the question had expired and Cllr O'Halloran advised that she would provide the remaining information in writing to Cllr Heather.

Supplementary question:

Thank you Councillor O'Halloran for that very comprehensive answer about what Islington Council is doing to protect renters in the borough. Of course what we know is another issue is housing supply for renters as well and therefore it's really concerning the we have housing associations in this borough that are selling off properties as a cash cow so they can actually invest elsewhere. Now, that's not good, what I would say is that the Council has got really proud record on this one. Councillor Ward met with the Peabody, who are a particular offender and implored him not to sell off the homes. Today, Peabody, at auction, sold of yet another home in Islington, so that's one less home for residents. Clearly, we clearly need to address this in some way and my question really is what can we do to highlight this issue and deal with Peabody and other housing associations selling homes, when we have 14,000 people on the waiting list that need homes. Thank you.

Response:

I want to say on record that Councillor Ward was right, he went and faced Peabody, face to face, and when I got that e-mail today that's what I intend to do. We are not a cash cow, we do not want people selling off and not investing back in Islington, so be

assured, people give us this mandate and I am very proud that we are building council homes everywhere, even on build overs and small places, because I am someone that lived in Quaker Court and there was 8 children, so I know what overcrowding is like, but trust me, we will be facing them, I will be ringing and on their doorstep.

Question (g) from Cllr Chapman to Cllr Ngongo, Executive Member for Children, Young People and Families:

We were delighted by the fantastic GCSE, A Level and vocational results this summer which significantly improved compared to 2019. What work is the Council doing to maintain these high standards in the years ahead?

Response:

Thank you very much Councillor Chapman for your question. I completely agree, we had the best results for our young people. Our young people couldn't achieve these results by themselves. I recognise the great work the schools are doing and Islington Council. If they don't have a decent life and a decent home to live in, they can't achieve this great result. That means housing also impacts on this. I agree with my colleagues, we must make sure we do decent work for our young people, our families, if we want really to carry on celebrating these great results.

These great result. All of us, we are proud of our young people who have surpassed expectations. We need to carry on to ensure we go better, because I believe in Islington we want to be the best and we are the best borough. This is what leads us to work in full collaboration with our schools and different partners.

We are in the process of developing our Education Plan, where we have nine pillars and six priorities. Among those priorities is to make sure that every single young person, every single child in this borough, deserve the best in terms of education, skills and employment and we do have a powerful plan through Fairer Together; they start well, live well and they age well. As soon as we can pull it all together and we give them a great place they can call home where they can live, we're going to carry on to celebrate these results.

We managed to bring our secondary school head teachers together around the table to speak with them, to discuss, to make them understand we are together in this journey. Our children come first and through that network we are discussing how can we improve the quality of education, with our help.

We are focussing on school improvement, what we can do together and I'm proud to see what we are doing Islington and I feel we still have a better future for our young people. Thank you again for your question.

Question (h) from Cllr Poyser to Cllr Ward, Executive Member for Finance, Planning and Performance:

This summer has demonstrated the severity of the climate crisis we face and the urgency to respond. Coupled with the energy crisis, not only will our residents feel the impact through their bills, so too will our council buildings and schools. With this in mind, what steps are the council taking to retrofit and insulate our council buildings and schools?

Response:

Cllr Poyser was not present in the Chamber, it was advised that a written response would be sent. This will be appended to the minutes.

Question (i) from Cllr Hamdache to Cllr Woolf, Executive Member for Community Safety:

Can you give an update on the progress of expanding the selective licensing scheme for landlords operating in Finsbury Park and the positive impact that the scheme has had?

The Mayor advised that the question would be answered by Cllr O'Halloran, Executive Member for Homes and Communities.

Response:

As I mentioned in my long answer to Councillor Heather earlier we are committed to supporting private renters. Sadly without the government's help we know rents are out of our control and we are unable to extend our landlord licensing scheme as far as we would like. However, we are still taking action. The consultation for the second phase of our licensing scheme finished at the end of March. Officers are currently in the process of doing some further analysis on the responses to provide more context for the results, which were heavily skewed, as more landlords appeared to answer the consultation than any other stakeholder.

The next stage will provide a report to the Executive for consideration. If this agreed then we will designate the scheme and it becomes enforceable three months after that. Looking at the current licensing scheme that became operational February 2021, due to the Covid restrictions at the time, we were not able to inspect property straightaway, so we focused initially on processing applications and other reactive work, but since year one, we've now inspected 226 properties. Benefits include that tenants are more empowered to contact the council to complain about poor housing conditions and unlicensed premises. This is the case even for un-licensable premises and since the scheme began we've had a 105 unlicensed complaints compared with 56 in the previous two years.

We have definitely improved over 200 properties that have received an inspection, but the application process itself is increasing compliance, as landlords generally start work on improving their properties before we inspect, which allows us to focus resources on non-compliant properties. Previously problematic landlords have now started to get on board with the process, the conditions and standards, but we know that compliant landlords are those who have applied so far, which will narrow down

the search for the rogue non-compliant landlords. The software has quickened up the application process and currently 1,754 licences have been issued and more currently are being processed. We will continue to put pressure on the Tory government and I hope you will join us to allow the Mayor of London to implement the rent controls and allow us to roll out a landlord licensing scheme across the borough, but I'm not holding my breath because we know what the Tories are like. Thank you for your question.

Supplementary question:

As a private renter, I find a lot of common ground with what Cllr O'Halloran has said. I think there's a lot of great work there. One thing that I want to draw attention to is the London Renters Union manifesto. I think a really sound document, created by renters from across the borough and I know many of us as Councillors at the last election signed a pledge to support their work. As part of their manifesto one of their calls is to expand selective licensing borough as far and wide as possible across the borough. Councillor O'Halloran how far do you think we will be able to reach that ambition and will eventually Islington Labour and Islington Council sign the manifesto and back in full?

Response:

Many of my colleagues, and we have our own private renters champion, Cllr Kay, have been doing lots of work. So I am actually a meeting and we've had several meetings with them to discuss how we can work together, because we are about protecting, so it's important to us. A resident is a resident, you know and deserve a fair rent, so I will fill you in with progress.

Question (j) from Cllr Russell to Cllr O'Halloran, Executive Member for Homes and Communities:

The papers to the Executive on 1st September showed that Council tenants and leaseholders living in the 57 council buildings with communal heating systems will be subject to escalating costs for heating and hot water. Can you set out how many buildings with communal heating systems are in each EPC category from A to F?

Response:

Thank you Councillor Russell. The Council holds data for energy performance certificate banding on tenanted homes and those served by communal heating systems. 67% of these are in Band C with a further 0.5% in band B and 22% falling into Band D and 0.6% in Band E. Individual properties within the buildings receive different ratings according to their particular features and positions within the building.

We are pursuing funding opportunities to support work to improve the energy performance of residents homes. However, without improved funding from the Tory government, again, it's extremely difficult to invest as much as we would like into improving our council homes and their energy efficiency. National statistics demonstrate that social homes generally have better performance than homes in the private rented sector and this is borne out in Islington too. We have been proactive in

the work we do. We do ensure all homes are insulated in cavity walls and many loft spaces, however, there are some buildings that are much more challenging to carry out improvement measures to and we are piloting new techniques and approaches in street property homes, to better understand how we can apply these to housing stock.

There is still more we can do and we're committed to improving the performance of blocks. We have successfully applied for wave one in the social housing decarbonisation fund and will continue to seek future ways of funding and to the green heat networks fund for future proofed homes. Cyclical improvement works have been commissioned to our communal heated homes as part of the Council's capital programme we are seeking to undertake works to improve the energy performance for all of all our homes under C banding.

Supplementary question:

Obviously, I agree with you entirely that if the Conservative government hadn't decided to stop funding installation, when David Cameron decided to cut the green crap, back in 2012, we would be looking at a completely different situation right now. So a couple of things, one is can you give me those numbers in writing because I've written them down, but I haven't necessarily heard every word that you said correctly. My supplementary question would be, have you got a priority list for when funding does become available, which homes will be insulated and does that priority include buildings with communal heating systems where there are people who are very exposed to energy prices.

Response:

I am happy to give any information to any councillors. We have definitely got programme, we are doing work with UCLH for this and I'm happy to share any finding as a result, but you're right I think the more we could do together, is all to fight to the Tories, so while you stand this in this Chamber it would be really great to just do what you can with us. I'm always happy to share.

The Mayor announced that the 30 minutes allowed for questions had expired and the remaining questions will receive a written response from the Executive Member.

Question (k) from Cllr Jegorovas-Armstrong to Cllr Woolf, Executive Member for Community Safety:

Can you update us on the Safe Havens program? How many people have used a safe Haven in Islington?

Response:

As the time allowed for questions had expired, it was advised that a written response would be sent. This will be appended to the minutes.

Question (l) from Cllr McHugh to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

With fuel prices at near-record highs, the impact on our vital public and community transport providers is proving substantial. In particular, we were saddened to learn of the difficulties faced by HCT Group, a social enterprise, resulting in the withdrawal of the 812 community bus service and the forfeit of several TfL routes to for-profit competitors.

Given this, and the ongoing funding constraints faced by TfL as a consequence of Government austerity, what steps has the Council taken to protect our local transport services and support those residents affected by the cuts, and what further steps need to be taken to protect our transport network from rising costs over the coming months?

Response:

As the time allowed for questions had expired, a written response was sent, as follows:

I agree. Hackney Community Transport (HCT) has been a really valuable partner to us, not only providing the service but also helping support it financially.

It is very sad that the financial impact of the pandemic, the recent surge in fuel prices, and the cost-of-living crisis have resulted in Hackney Community Transport no-longer being able to operate the 812 bus service. Officers did see whether we could work with HCT to try to save the service but HTC were clear that was not possible.

In those circumstances the action the council could and did take was to communicate the closure of the service as quickly as possible, letting users know and inviting those with concerns to contact the 'We are Islington' helpline for advice on alternatives and any other support they need.

Officers are looking at the options now that HCT can no longer run the service and we are looking at how best to support those who rely on the service, and we will be engaging with councillors and local people in due course.

In relation to your broader question about transport services, the 812 was unique in Islington, and we believe across London in that it was a public service over which we have some control. All other forms of public transport are outside our direct control.

As we have seen in recent months, the severe funding constraints placed on TfL by the Tory Government has put a lot of pressure on TfL and its ability to provide a high-quality public transport network. The recent settlement does not give confidence that pressure of TfL finances will not remain. We have all been concerned about the proposed loss of or degradation a number of bus services in the borough. Colleagues here were very much part of our recent campaign to Stop the Proposed bus cuts which culminated in us delivering the petition to the DfT.

The Council put in a submission to the recent consultation on the proposed bus cuts and will continue to impress upon TfL and the government the importance of reliable and resilient public transport in tackling climate change but also in tackling inequality

and fairness. We know that people on lower incomes, older people and people with disabilities are disproportionately impacted by cuts in particular to bus services. If we are serious about tackling the public health crisis that is caused by air pollution a reliable public transport system is vital. We can offer support to people affected in other ways.

We know that if we make walking, wheeling and cycling safer and more attractive many people will see that as an alternative and that has a huge benefit in terms of health and well being. That is why I am so pleased that for the second year running Islington has achieved the top score among the London boroughs in the Healthy Streets Scorecard ranking.

But walking, wheeling and cycling are often not alternatives to public transport, they are complimentary. And some people can not or do not want to walk or cycle instead of hopping on a bus. We will continue to roll-out of our people-friendly streets programme, continue with active travel initiatives including a network of 500 bike hangars by the end of this financial year, continue to expand free and secure cycle parking on council estates, continue to support for schools to encourage students to walk and cycle as part of the STARS programme, and continue free cycle training for adults and children in Islington.

We will also continue Our Try Before You Bike scheme allows anyone who lives, works or studies in the borough to try out a new or nearly new bike for a monthly fee to help with the cost of purchasing a bike.

But we will also continue to not just defend our current public transport system but also continue to put pressure on TfL to make it more inclusive and accessible so that all local people can choose it as a sustainable way of travelling. Thank you for posing your question.

Question (m) from Cllr Russell to Cllr O'Halloran, Executive Member for Homes and Communities:

What is the Council's timeline for insulating and ventilating every council home in the borough?

Response:

As the time allowed for questions had expired, it was advised that a written response would be sent. This will be appended to the minutes.

Question (n) from Cllr Jegorovas-Armstrong to Cllr Ngongo, Executive Member for Children, Young People and Families:

What has Islington Council and Islington schools planned for Anti-Bullying Week 2022 (Monday 14th - Friday 18th November)?

Response:

As the time allowed for questions had expired, it was advised that a written response would be sent. This will be appended to the minutes.

206 CHIEF WHIP'S REPORT

Councillor Hyde moved the recommendations in the report. The recommendations were put to the vote and CARRIED.

RESOLVED:

- (i) That Councillors Croft, Gill, Mackmurdie and Staff be appointed as substitute members of the Licensing Regulatory Committee;
- (ii) That Councillor Heather be appointed as a substitute member of the Housing Scrutiny Committee;
- (iii) That Councillor Heather be appointed as a substitute member of the Health and Care Scrutiny Committee;
- (iv) That Councillor Williamson be appointed as a substitute member of the Planning Committee;
- (v) That Councillor Croft be appointed as a substitute member of the Environment and Regeneration Scrutiny Committee;
- (vi) That Councillor Zammit be appointed as a substitute member of the Audit Committee;
- (vii) That Councillor Bell-Bradford be appointed as the Council's representative to the Moorfields Eye Hospital NHS Foundation Trust for the remainder of the municipal year, or until a successor is appointed.
- (viii) That Councillor Bossman-Quarshie be appointed to the Board of St Luke's Trustee Ltd for a four year term, or until a successor is appointed.

207 NOTICES OF MOTION

Motion 1: Declaration of cost of living emergency

The Mayor advised that an alteration to the motion had been circulated in the second despatch of papers and this was formally noted by the Council.

Councillor Pandor moved the motion; Councillors O'Sullivan and Russell seconded.

The motion was put to the vote and CARRIED.

RESOLVED:

To build an inclusive local economy that works for all, by calling on the Government to:

- Secure our energy future and support a new generation of skilled green jobs by investing in a rapid rollout of renewables and storage technology, held in common ownership for the public good.
- Increase the National Minimum Wage to the level of the real Living Wage, as identified by the Living Wage Foundation

- Uplift Universal Credit and all other benefit payments in line with inflation
- Introduce universal free school meals for all children, as Islington Council has done for primary school children since 2009.
- Allow the Mayor of London to bring in rent controls, saving tenants money and supporting people through the cost of living crisis.
- Implement the official national opposition's proposal to freeze gas and electricity prices immediately to give people breathing space over the winter. This means the domestic energy price cap would stay at its current level of £1,971 from October to April rather than £2500 price cap announced by Prime Minister Liz Truss; it would mean no rise in household energy bills until April 2023 with pensioners and low to middle income families still receiving planned additional support with already elevated bills.
- Support a £1bn fund to help energy intensive industries with the higher cost of energy.
- Increase the business rates threshold for small business rates relief (from the current threshold of £15,000 to £25,000), to give SMEs a discount on their business rates bill for 2022/23, ahead of more fundamental reform proposed by the government.
- Fully fund a further investment in the Islington Council Tax Support Scheme
- Restore the £20 Universal Credit uplift along with a further increase taking the uplift to £40
- Urgently fund a national retrofitting scheme, to ensure every home has the insulation needed to keep people warm and reduce energy bills.

Motion 2: Bring water back into public ownership

Councillor Craig moved the motion. Councillor Nargund seconded. Councillor Hamdache contributed to the debate.

The motion was put to the vote and CARRIED.

RESOLVED:

- (i) To continue calling on Thames Water to invest further in water infrastructure to avoid the burst water pipes and leaks we have seen in Islington this summer;
- (ii) To call on Thames Water, and all other water companies, to cease the release of raw sewage into seas and rivers, to keep our waters clean and safe;
- (iii) To write to Central Government to ask for the water industry to be brought back into public ownership, delivering better services for the benefit of local people.

Motion 3: Cost of living crisis

As Motion 1 had been carried, Councillor Russell withdrew the motion.

The meeting closed at 9.30 pm

MAYOR

This page is intentionally left blank



COUNCIL MEETING – 8 DECEMBER 2022

QUESTIONS FROM MEMBERS OF THE PUBLIC

a Luke Howard to Cllr Ward, Executive Member for Finance, Planning and Performance:

How will the council ensure their green credentials and commitment to expanding and protecting the current lack of open space in the densest area and borough in the U.K, the Islington St. Luke's area, and in keeping with their sustainability commitment, how will you re-utilise the surplus of unused office space and flats in the St. Luke's area to address Islington's housing need?

b Rebekah Kelly to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

At the councils executive meeting in October 2021, the People Friendly Pavements scheme was launched. Can you provide an update to what has happened since to improve pavement conditions in Islington since then?

c Pete Gilman to Cllr Ward, Executive Member for Finance, Planning and Performance:

How much has central government funding to Islington Council been cut by the Tories since 2010, and what is the cumulative total; how has this impacted on Islington Council's ability to provide essential services and its house building programme; how do these cuts compare with those made to wealthier boroughs like Richmond; can Islington Council give assurance it will press for a restoration of central government funding?

d Steven Nyandu to Cllr Woolf, Executive Member for Community Safety:

Research by Be Gamble Aware has revealed one in ten (12%) women have turned to gambling in an attempt to supplement their household income. How can the council strengthen its collaboration work with VCS groups to help prevent vulnerable people becoming victims of gambling-related harm, particularly as the cost of living crisis has seen an increase in gambling as a means to resolve financial hardship?

e **Sarah Jane Elvin to Cllr Ngongo, Executive Member for Children, Young People and Families:**

Can the Council confirm and give reassurance to the local community that the Islington Boat Club site will remain a dedicated charitable community led boat club (*on the site of 16-34 Graham Street as indicated in the Bunhill Ward plan 2019*) for the provision of water sports for young people and community groups and will not be taken over by another high rise building and/or commercial interests?



COUNCIL MEETING – 8 DECEMBER 2022

QUESTIONS FROM MEMBERS OF THE COUNCIL

a Cllr Burgess to Cllr Turan, Executive Member for Health and Social Care:

It is estimated that there are about 19,000 unpaid carers in Islington; that's nearly 10% of the population. These are family members or friends who look after those who need assistance for various reasons. The cost of living crisis will be impacting very heavily on these unpaid carers. Please could you let us know what the Council is doing to assist unpaid carers.

b Cllr Clarke to Cllr Ward, Executive Member for Finance, Planning and Performance:

Barclays Bank has one of the worst records for investing in fossil fuels. When the council contract with Barclays comes up in 2025 will you look at other options if Barclays has not cleaned up its record on fossil fuels by then?

C Cllr Heather to Cllr O'Halloran, Executive Member for Homes and Communities:

Council homes on the Andover Estate have reported for years of ongoing damp issues, which previous cyclical works have unfortunately failed to resolve. In recent years, unused garages have been redeveloped to build new council homes with natural through ventilation that mitigate against damp. Can the council reassure me and residents not just on the Andover Estate, but across the borough, that the Council is doing all it can, through its cyclical works programme, to tackle damp in council homes and ensure they are the best they can be?

d Cllr Jeapes to Cllr Ward, Executive Member for Finance, Planning and Performance:

The latest contemptable policy conceived by this Conservative Government, desperate to cling on to power, is to require UK citizens to produce mandatory voter ID when turning up to vote at all elections. This draconian policy, which is a transparent block to the democratic process, will make it harder for millions to cast their vote, potentially excluding eligible citizens from voting and suppressing turnout particularly among disadvantaged groups.

The final list of what sort of ID will be accepted has still not been announced by the government. It is proposed to make it the duty of councils to issue people with an electoral identity document if they do not have any of the agreed forms of photo ID, such as a driving licence or passport. Therefore, it is imperative that all Islington residents need to be made aware of this change to their voting rights and provided with the documentation needed to exercise their right to vote.

There is a Government proposal to issue new free "Voter Authority Certificate" for those without any other form of photographic ID. However, implementing this unnecessary bureaucratic policy of disenfranchising the Populus will cost considerable officer time and public finances. Is it possible to estimate the costs of time and money to the Council of implementing this burden to democracy?

e Cllr North to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

The Lumen data centre (located in the former gin factory building at 260-266 Goswell Road) uses diesel-powered generators to provide an emergency electricity supply in the event of power outages. Neighbours at Kestrel House, Peregrine House and on Moreland Street report that these generators are running more and more frequently, emitting black smoke and harmful fumes into our local environment.

In the context of Islington Labour's efforts to improve air quality and tackle the climate emergency, can the Executive Member assure me that the council is doing everything possible within our powers to monitor these polluting activities at the Lumen data centre, enforce against them where possible and reduce the impact on local residents?

f Cllr Ogunro to Cllr Ward, Executive Member for Finance, Planning and Performance:

The cost of living crisis is having a severe impact on people across Islington right now. I am seeing it in my casework, and it is only going to get worse. In the absence of any action from the Tory Government, what support is the Council providing to help vulnerable families through the current cost of living crisis?

g Cllr Nargund to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

In the Islington Labour manifesto for the 2022 Local Elections, we promised to genuinely consult and co-design a series of Liveable Neighbourhoods with residents, to ensure we are making changes that they want to see. Can you confirm this is still the case and that the Council's work to create a cleaner, greener, healthier borough will be undertaken alongside local people?

h Cllr Khurana to Cllr Turan, Executive Member for Health and Social Care:

We all know that public services should always be in public hands. It was wonderful news to hear that Centene's contract was not renewed at Hanley Primary Care Centre. In your role as Executive Member for Health and Social Care, how will you campaign to ensure our local NHS services are not once again put into the hands of profiteering corporations?

i Cllr Burgess to Cllr Ward, Executive Member for Finance, Planning and Performance:

We all know that Islington is one of the most densely-populated boroughs in the country. Islington Council continues to provide more safe, decent, genuinely affordable homes for our whole community, and that must include our Gypsy and Roma Traveller community.

One of the sites identified for Gypsy and Roma Traveller accommodation during the Local Plan process is 207A Junction Rd, the current site for the Shaolin Temple. Our community fully supports the provision of accommodation for the Gypsy and Roma Traveller community but wants to make sure that the Shaolin Temple isn't lost. Can you confirm that the Council will support the Shaolin Temple as much as possible to source an alternative site if the Local Plan is approved?

j Cllr Jegorovas-Armstrong to Cllr Ward, Executive Member for Finance, Planning and Performance:

Can the council update us on progress against the target of completely divesting the council's pensions fund from fossil fuels?

k Cllr Hamdache to Cllr O'Halloran, Executive Member for Homes and Communities:

Many leaseholders are coming to us in huge distress in face of the bills they're facing for cyclical repairs. What is the council doing to help those households struggling to pay?

l Cllr Russell to Cllr Champion, Executive Member for Environment, Air Quality and Transport:

At the time of submitting this question, the Islington Council website states that:

“There are eight public toilets located conveniently around the borough. Seven of these are automated, fully accessible and are open 24 hours a day. There is a 20p charge to use these but are free for RADAR key holders.

There is also an attended public toilet, which is fully accessible, serving traders and shoppers at Chapel Market. It is open 8am to 6.30pm Monday to Saturday and 8am to 4pm on Sundays.

To help deal with anti-social street urination around Clerkenwell at weekends, a pop up urinal is available in Cowcross Street outside The Hope pub. It is available on Friday from 7pm to 6am on Saturday morning and from Saturday at 7pm to 6am on Sunday.

You can find our automated public toilets at the following locations: Holloway Road, Seven Sisters Road, Highbury Crescent. Highbury Fields, Newington Green, Islington Green (closed) and City Road (closed).”

Age UK London campaigners are concerned that the automated toilets are all out of order. What is your plan to get them reopened?

m Cllr Russell to Cllr Ward, Executive Member for Finance, Planning and Performance:

Following the tragic death of Awaab Ishak after breathing mould in his home in Rochdale, what action has the council taken to review repairs processes for cases of mould?

Community Wealth Building Department
7 Newington Barrow Way, London, N7 7EP

Report of: Executive Member for Finance, Planning & Performance

Meeting of: Full Council

Date: 8 December 2022

Ward(s): All

Subject: The Council Tax Support Scheme for 2023/24

1. Synopsis

- 1.1. The Council Tax Support Scheme for 2022/23 was agreed by Council on 9 December 2021. The Scheme has to be agreed by full Council by 11 March for each subsequent year, even if it remains unchanged.
- 1.2. There are no changes to the scheme proposed for 2023/24. This report seeks approval for the Council Tax Support Scheme for 2023/24.
- 1.3. Islington's Council Tax Support Scheme is an important part of the safety net we offer to help support and protect low-income households.
- 1.4. The Council will be considering amendments to the Council Tax Support Scheme to take effect from 2024/25. Any forthcoming proposals will be subject to public consultation.
- 1.5. There is also a legal requirement to affirm on an annual basis the council tax discounts and exemptions for empty properties and the empty rates premium.

2. Recommendations

- 2.1. To agree to adopt the Council Tax Support Scheme for 2023/24 as contained in Appendix A.

2.2. To retain the amendments to council tax agreed at full Council on 9 December 2021. To be clear, this means that, from 1 April 2023, numbers 1 – 4 below will continue to apply and 5 will be added:

1. Council tax exemption classes A (unoccupied and unfurnished property that requires or is undergoing major repairs) and C (unoccupied and unfurnished property) will have a discount of 0% for all cases
2. Council tax discount for second homes will be 0% in all cases
3. Council tax discount for empty furnished lets will be 0% in all cases; and
4. A premium will be charged at the maximum percentage allowed of 100% on the council tax of all properties that have remained empty for over 2 years but less than 5 years in all cases. A premium will be charged at the maximum percentage allowed of 200% on the council tax of all properties that have remained empty for over 5 years but less than 10 years in all cases. A premium will be charged at the maximum percentage allowed of 300% on the council tax of all properties that have remained empty for over 10 years in all cases.
5. In addition, where the Legislation allows for a higher potential council tax premium for Second Homes (also known as "dwellings occupied periodically"), the Council will levy the maximum council tax premium allowable from the earliest date that the Legislation allows.

3. Background

- 3.1. As a result of the Government's abolition of council tax benefit from 1 April 2013, combined with a reduction in our funding from the Government of £2.9m at that time, we had to propose and consult on a new Council Tax Support Scheme. Further consultation was carried out in 2016 and again recently in 2021.
- 3.2. There is a legal requirement for the Council to agree the scheme each year and a further requirement to consult with residents if the scheme is changed.
- 3.3. No changes are proposed within the Council Tax Support Scheme for 2023/24.

4. Implications

4.1. Financial Implications

Since there is no proposal to change the existing 95% WA support, the estimated costs for 2023/24 broadly anticipated to be in line with the current year costs.

However, the actual annual costs to the council would depend on level of council tax increase and future increase/decrease in working aged caseloads. Thus, the future financial implication is based on estimated costs using the existing caseloads and financial data. The table below summarises the total financial impact to Islington council for supporting the working aged at 95%.

	Estimate £m
Current total cost of CTS (WA and pensioners)	31.584
Current cost of WA CTS	22.070
Estimated Costs to LBI share of WA CTS.	16.965

4.2 Legal Implications

The Council Tax Support Scheme is lawful. There are no material changes to the terms of the scheme for 2023/24, so the requirement now is for full Council to agree the scheme for its continuing adoption from 1 April 2023 for the full 2023/24 council tax year.

The Council must have due regard to the Public Sector Equality Duty, which is integral to the Council's functions, and which is set out in Section 149 of the Equality Act 2010 as follows:

- 1) A public authority must, in the exercise of its functions, have due regard to the need to:
 - a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it

- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it...
- 2) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard for the need to:
- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
 - b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
 - c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 4) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard for the need to:
- a) tackle prejudice
 - b) promote understanding
- 5) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.
- 6) The relevant protected characteristics are:
- a) age
 - b) disability
 - c) gender reassignment
 - d) pregnancy and maternity
 - e) race
 - f) religion or belief
 - g) sex
 - h) sexual orientation

The equality implications of the proposed scheme for 2023/24 are detailed in section 4.4.1 and as more fully particularised in the detailed assessment set out in Appendix B.

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

4.2.1. Not applicable.

4.3. **Equalities Impact Assessment**

4.3.1. 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.

An Equalities Impact Assessment was completed on 3 October 2022. The Council Tax Support Scheme Resident Impact Assessment is attached as Appendix B.

5. **Conclusion and reasons for recommendations**

5.1. This report recommends that no changes are made to scheme and that the Council Tax Support Scheme for 2023/24 is approved on this basis.

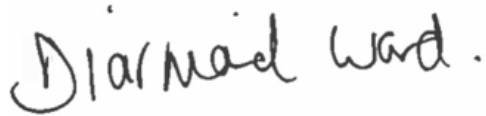
5.2. This report recommends that we continue with the changes made in 2013/14 and updated subsequently to discounts and exemptions for empty properties and continue to charge the maximum premium allowed in law for properties left empty for more than two years, five years and ten years. This helps to bridge the gap imposed by the Government in the council tax support scheme funding, so that, in line with our principles, those who are able to pay more will continue to support those who are less able to pay.

Appendices:

- Appendix A: Council Tax Support Scheme for 2023/24
- Appendix B: Resident Impact Assessment
- Appendix C: From the cradle to the grave – a lifetime of support

Final report clearance:

Signed by:

A handwritten signature in black ink that reads "Diarmaid Ward." The signature is written in a cursive, slightly slanted style.

Cllr Diarmaid Ward

Date: 09/11/2022

Report Author: Robbie Rainbird – Assistant Director Community Financial Resilience Tel:
020 7527 8970

Email: Robbie.Rainbird@islington.gov.uk

Financial Implications Author: Khogen Sutradhar – Principal Accountant

Tel: 020 7527 2499

Email: Khogen.Sutradhar@islington.gov.uk

Legal Implications Author: Sonal Mistry – Senior Lawyer

Tel: 020 7527 3833

Email: Sonal.Mistry@islington.gov.uk

Appendix A

London Borough of Islington

Council Tax Support Scheme

Draft - For Approval by Council on 8 December 2022

Islington Council: Council Tax Support Scheme

1. This document and the law

This document is the London Borough of Islington's Council Tax Reduction Scheme, set out under section 13A (2) [substituted by clause 8 of the Local government finance Bill] of the Local Government Finance Act 1992.

This scheme, referred to as Council Tax Support (CTS), has been agreed based on:

- the outcome of a public consultation exercise carried out in 2012, repeated in 2016 and 2021;
- the Equality Impact Assessment made in relation to the scheme and the subsequent Resident Impact Assessments carried out annually; and
- Considerations and decisions made annually by full Council.

2. Introduction

CTS reduces the amount of council tax a person has to pay based on an assessment made by Islington Council (the Council). As the Billing Authority, council tax is raised and charged by the Council and the CTS assessed by the Council can only be applied to council tax bills issued by the Council.

This scheme sets out rules for three classes of claimants. The amount of CTS shall be determined through means testing. As such the income and capital of the claimant and any partner or partners in the case of a polygamous couple in the household shall be taken into account. It is considered that eligibility for CTS is defined by the terms of the former Council Tax Benefit (CTB) scheme as set out in the Social Security Contributions and Benefits Act 1992, the Social Security Administration Act 1992, the Council Tax Benefit Regulations 2006 and the Housing Benefit and Council Tax Benefit (Decisions and Appeals) Regulations 2001, the Council Tax Reduction Schemes (Default Scheme) (England) Regulations 2012. These will hereafter be known as the Regulations and these Regulations set out how CTB was claimed, how it was calculated and how it was paid. This scheme proposes that the principles and methods set out in those Regulations be used to determine CTS, except where amendments are set out in this scheme or by statute under the Local Government Finance Act 1992 (as amended) and accompanying legislation. For the avoidance of doubt, where there is a difference or conflict between the Regulations and the Council's CTS scheme, then it is the Council's CTS scheme as set out here that will take precedence and be applied.

3. Making a claim

A claim must be made in respect of a person who is resident in the dwelling concerned, and liable for payment of council tax. A valid claim can be made by the person liable for council tax or by their appointed representative.

3.1 How to claim

3.1.1 Except where paragraph 3.1.2 applies, an application shall be required for all new claims from 1 April 2013. A person liable to pay council tax will be able to make a claim using any of the methods the Council provides for. Generally, claims can be made via telephone, email, the Council website, in writing or in person at Islington Council offices, or to the Department of Work and Pensions (DWP) and Jobcentres. Notification by the DWP that a person has claimed universal

credit will be treated as an application for CTS. A valid claim must be accompanied by the necessary supporting evidence.

3.1.2 For claimants entitled to the reduction in class 2 only (defined below), where it is possible for the Council to award CTS without application it shall do so. Indeed, for this provision an identification by the Council that a person would be entitled to this reduction by virtue of relevant detail already obtained by the Council may be enough to constitute a claim and to enable the award of a reduction. If a reduction cannot be awarded by the Council automatically under class 2, it shall be the duty of the person or persons with a council tax liability to claim this using the application process prescribed on the Islington Council website, and this application shall be required to be received in the council tax year for which the reduction applies.

4. Classes of reduction

4.1 It is considered that the Council has 3 classes of reduction in its CTS scheme. The classes below also identify the persons that the reduction will cover.

Class 1 – A person or persons of pension credit age has protection prescribed in the Local Government Finance Act 1992 (as amended). The council tax reduction shall be assessed in accordance with the provisions of that Act.

Class 2 – A person or persons with a council tax liability on 1 April 2022 and of state pension age or over shall be entitled to a minimum reduction of £100 per annum, unless the council tax liability is less than this, in which case it shall match the annual council tax liability.

Class 3 – A person or persons not entitled to protection under class 1 who would be entitled to CTB based on the Regulations at 31 March 2013:

- a) shall be entitled to CTS based on that notional CTB entitlement, less 5%; and
- b) if, after the accurate calculation of the CTS award under Class 3a), subsequent calculations or revisions of the same CTS award would result in a decrease in the CTS award of less than £1 a week cumulatively, then no decrease shall be applied. This excludes uprating as defined in clause 5.3.

4.2 Making changes to the dates for the classes of reduction

For Class 2, the Council may substitute the date provided with a date of its choosing. This will enable the scheme to continue into future years. Any changes to dates shall be published on the website by 11 March of the year that immediately precedes the new council tax year to which the CTS shall apply.

4.3 Making changes to the values for the classes of reduction

For Class 2, for the minimum reduction the Council may substitute any amount it chooses, including £Nil. Should a change be made for a future council tax year, this shall be published on the website by 11 March of the year that immediately precedes the new council tax year to which the CTS shall apply.

For the purposes of Class 3a), the Council may substitute 5% with any amount it chooses but capped at 25%.

For the purposes of Class 3b), the Council may substitute £1 with any amount it chooses. Should a change be made for a future council tax year this shall be published on the website by 11 March of the year that immediately precedes the new council tax year to which the CTS shall apply.

4.4 Administering the reduction

For all Classes the reduction shall be made to the council tax liability in the council tax year that the CTS applies.

4.5 Explanation of the cumulative effect in Class 3b)

The intention is that subsequent calculations or revisions of the same CTS award that would result in a decrease in that CTS award of less than £1 a week, would only take effect when the combination of these changes would reduce that CTS award by £1 a week or more. In other words, changes in circumstances that, if applied, would reduce the CTS award would be held back until the cumulative impact of these when combined with future changes actually reduces the CTS award by £1 a week or more. This excludes uprating as defined in clause 5.3.

5. Exceptions to the Regulations

This scheme proposes that the principles and methods set out in the Regulations be used to determine CTS, except where amendments are set out in this scheme or by statute under the Local Government Finance Act 1992 (as amended) and accompanying legislation.

The exceptions to these Regulations (or clarifications) are set out below:

5.1 Information and evidence

The Council may accept any information or evidence that it sees fit to support a claim for CTS and may receive this in any way that it sees fit. As a guide, it shall publish what is expected on the Council's website. If all the information or evidence it needs is not submitted, the Council shall seek to make contact with the claimant once to obtain this. If the claimant does not reply or provide the information required within one month of the first contact made with or by the Council in relation to the application, the Council may decide to treat the claim as incomplete and refuse the CTS application. The Council may extend the one-month time limit if it thinks it is reasonable to give more time but in any case this shall not be extended beyond 3 months after the date of the first contact made with or by the Council in relation to the application.

5.2 Treatment of income

For the purpose of making an assessment under the CTS scheme, all income shall be treated in accordance with the Regulations. However, from time to time the Government may reform welfare benefits and introduce new benefits or replace them with equivalent benefits of a different name. Under the Regulations, some prescribed income is disregarded, some prescribed income has an impact on the premiums that can be applied to a person's applicable amount, and some prescribed income has an impact on the level of a non-dependant deduction(s) to be applied. In addition to this, some prescribed income passports a person to full entitlement to CTB, albeit subject to certain deductions such as a non-dependant deduction.

It is the intention of the Council for the CTS scheme, that where such income is replaced by the Government by an equivalent benefit or where new benefits are introduced, that these changes should be applied at the same time to CTS (or as soon as practicable thereafter) and attract the appropriate and equivalent income disregard, premium for the applicable amount and non-dependant deduction. It is also the intention to continue to passport an equivalent benefit to full entitlement to notional CTB to allow the CTS to be calculated.

To achieve this, when a new welfare benefit (income) is introduced by Government, the Council shall decide for the purposes of applying the Regulations:

- whether it should be disregarded; and/or
- the premium (if any) that it should attract; and/or
- the non-dependant deduction that should apply (if any); and/or
- whether it should be treated as income that would passport a person to full notional CTB entitlement.

Once the Council has decided how changes to other welfare benefits shall be treated for the purposes of applying the Regulations, the Council shall publish this detail on the Council website prior to the commencement of this new welfare benefit or as soon as practicable thereafter. Any changes will be summarised in Appendix A1.

The Regulations currently afford the Council the discretion to disregard war widows pension and war disablement allowance. The Council will continue to disregard this income for the purposes of assessing CTS.

Any payment from Islington Council through the Support Payment Scheme to non-recent child abuse survivors will be disregarded as both income and capital.

Universal Credit income will be treated in accordance with the Regulations and The Council Tax Reduction Schemes (Default Scheme) (England) Regulations 2012.

5.3 National changes to premiums, allowances, applicable amounts, disregards and deductions (the components)

For the purpose of making an assessment under the CTS scheme, all the components shall be treated in accordance with the Regulations. However, from time to time the Government may reform welfare benefits and:

- introduce a new component;
- change the value of an existing component; or
- change the basis on which an existing component can be applied.

Where this happens, the Council will have the option immediately to make a change to the CTS scheme based on the treatment of a similar component in an equivalent national scheme. An equivalent national scheme means either the provisions that form the basis for assessment under Class 1 or the Housing Benefit General Regulations 1987 (as amended).

The Council shall determine how changes to the components in an equivalent national scheme will be treated for the purposes of assessing an award under Class 3, including the date that any change will take effect. The Council shall publish this detail on the Council website prior to the commencement of these changes or as soon as practicable thereafter. Changes published in previous years are summarised in Appendix A1.

From time to time, the components and some income will be subject to uprating by the government to reflect changes in the consumer price index. This scheme provides that the Council shall uprate all the components and income in accordance with the Government's uprating of the same or equivalent components (as identified by the Council) in the equivalent national scheme.

5.4 Payment of Council Tax Support for two homes

The criteria for the award of Council Tax Support on two homes applies only in the following circumstances:

- Moved out of the home because of violence or fear of violence, council tax support can be paid for both homes, if intention to return home, for a period of up to 52 weeks.
- Awaiting disability adaptations on new home and unable to move in until these are carried out up to 4 weeks.
- Moved out within the last 4 weeks and still have to pay rent on old home (for council tax support this would be one day).

5.5 Decisions and notifications of decisions

The Council shall make a decision on a claim within a reasonable timescale after receiving all required information and evidence. In order to inform a claimant of the decision, the Council shall send them a revised council tax bill showing the amount and period of the CTS award. The bill itself shall be formal notification of the CTS decision unless CTS is not awarded as a result of us deciding to treat the claim as incomplete or the person does not qualify for CTS, in which case a letter will be issued to the claimant. Claimants may request a statement of reasons to explain how the award was calculated. The council tax bill shall include a person's appeal rights, how they can request a statement of reasons and details of how to apply for further discretionary help from the Council Tax Welfare provision in the Resident Support Scheme. The claimant can elect to receive their bill by post or by using Islington's web portal 'My eAccount', also known as e-billing. For the avoidance of doubt, the requirements in the Regulations to notify a person of their CTB entitlement in a manner and including detail prescribed by those Regulations shall be revoked for the purposes of the CTS scheme.

5.6 How CTS will be paid

All CTS will be 'paid' by crediting the amount of CTS against the claimant's council tax liability to reduce the bill. Should a bill that attracts a council tax reduction be in credit at the point that a council tax liability is ended, the Council may use that credit to reduce any other sum that is owed to the Council by that person.

5.7 Changes of circumstances

The recipient of CTS or their appointee must notify the Council of any change to their household circumstances, income or capital that may affect the amount of CTS they are entitled to. Any change of circumstances must be reported within one calendar month of the change happening. Any change can be reported to Islington Council by telephone, email, via website or in writing. Supporting information may be required. Each material change shall result in a recalculation of CTS entitlement and a revised bill if appropriate.

A process for reviewing current CTS entitlement may be implemented by the Council. CTS may be reviewed at any time after its commencement. Failure of the claimant to fulfil any reasonable request made by the Council during a review of their CTS award shall result in the termination of that CTS award from the commencement date of the review.

5.8 Appeals

If the claimant disagrees with the CTS award or non-award following a claim, they can request that the Council looks at this again (this is known as an application for revision). They must do this within one month of the date of the council tax bill that shows the amount and period of their CTS or within one month of the date of their CTS non-qualification letter. If an appeal made by the same claimant about a housing benefit decision would also impact on CTS, the Council may also treat this as an appeal against CTS if it is made within one month of the date of the council tax bill that shows the amount and period of the CTS. The Council shall check if the decision is

correct and inform the claimant of its decision in writing. If, the Council believes that its decision is correct or the claimant does not receive a response from the Council within 2 months, the claimant has another 2 months to appeal to the Valuation Tribunal where a final decision can be made. Any appeal against a decision regarding CTS will not mean that payments of council tax may be withheld. Payments must be made as they fall due and if an appeal is successful any additional CTS award shall be credited against the claimant's council tax liability at that time as directed.

5.9 Excess Benefit

Regulation 82 and 83 of the CTB Regulations 2006 will not apply to this scheme. If following a recalculation of the entitlement to Council Tax Support, regardless of the cause for the need for that recalculation, if the chargeable amount of the council tax bill is greater than the previous notification, the council can bill the taxpayer for the difference. Payments must be made as they fall due.

6. General Provisions

6.1 Council Tax Welfare Provision

There is a welfare scheme available for council tax payers receiving CTS experiencing exceptional hardship. This is part of the Resident Support Scheme and the procedure for application is contained within the detail of the Resident Support Scheme approved by the Council's Executive.

6.2 Fraud

The Council will investigate any case where it has reason to believe that an amount of CTS has been awarded as a result of a claim which is fraudulent in any respect. This will include any incidence of a claimant not notifying the Council of any change in household circumstances, income or capital that results in a higher reduction under the CTS scheme than a person is due.

6.3 Consultation

The Council recognises its legal duty to consult should there be future changes to the scheme. However, from time to time the council will need to make minor changes to the practice and operation of the scheme and, should these occur, we will consult by way of publishing a notice on the Council's website during the last 2 weeks of January of the year that immediately precedes the new council tax year to which the CTS shall apply. A consultee shall then have until 31 January of that same year to respond to this notice. The Council officers delegated to operate the scheme will give due regard to this response.

6.4 Delegation

The Council shall delegate the operation of this scheme to the Corporate Director of Community Wealth Building who will designate the appropriate officers to undertake this role. Currently, these officers are all based in the Community Financial Resilience Directorate of the Council's Community Wealth Building Department.

6.5 CTS Scheme Agreement

The CTS Scheme will be reviewed annually and subject to further agreement at Full Council prior to 11 March each year.

1. Changes to the Council Tax Support scheme

This document details changes made to the London Borough of Islington's Council Tax Support scheme published on the council website in accordance with 4.2 of the scheme.

<https://www.islington.gov.uk/benefits-and-support/council-tax-support>

1.1 Temporary absence outside of Great Britain

From 15 January 2017, the rules about getting Council Tax Support if a claimant goes abroad have changed to bring them in line with the changes in Housing Benefit rules to mirror the amendments to the Housing Benefit Regulations 2006 as outlined in The Housing Benefit and State Pension Credit (Temporary Absence) (Amendment) Regulations 2016.

1.2 Restrictions on the amounts for children and qualifying young persons

From 1 April 2017, the number of personal allowances, which can be included in the applicable amount for Council Tax Support in respect of children and qualifying young people, will be limited to no more than two children. This is in line with the Child Tax Credit restrictions announced in the Summer Budget of 2015, which in turn affect the applicable amounts for Housing Benefits as outlined in The Social Security (Restrictions on Amounts for Children and Qualifying Young Persons) Amendment Regulations 2017.

Resident Impact Assessment

**Screening and full assessment of Islington's
Council Tax Support (CTS) Scheme.**

Contents

Click to navigate to sections

1. [Introduction and context](#)
2. [Initial Screening](#)
3. [The proposal](#)
4. [Equality Impacts](#)
5. [Socio-economic, safeguarding and Human Rights impacts](#)
6. [Summary: key findings of the RIA](#)

1. Introduction and context

A Resident Impact Assessment (RIA) is a way of systematically and thoroughly assessing policies against the Council’s responsibilities in relation to the Public Sector Equality Duty, Human Rights and Safeguarding.

This RIA will describe the CTS scheme, its intended purpose and how it has been implemented. It will detail which residents are expected to be affected by the policy and the expected impact in relation to:

- The [Public Sector Equality Duty](#);
- Safeguarding responsibilities; and
- Human Rights legislation, specifically with regard to Article 3 (Inhuman Treatment) and Article 8 (Right to Private Life)

We will identify evidence, such as data and research, to assess the impact of the CTS scheme and identify options for addressing issues raised by the assessments.



2. Screening

a) Title of new or changed policy, procedure, function, service activity or financial decision being assessed:	Council Tax Support Scheme (CTS) 2023 - 2024
b) Department and section:	Community Wealth Building, Community Financial Resilience
c) Name and contact details of assessor:	Robbie Rainbird, robbie.rainbird@islington.gov.uk
d) Date initial screening assessment started:	3/10/2022
e) Describe the main aim or purpose of the proposed	To help low-income council tax charge payers pay their Council Tax

new or changed policy, etc. and the intended outcomes:

f) Can this proposal be considered as part of a broader Resident Impact Assessment? For example, it may be more appropriate to carry out an assessment of a divisional restructure rather than the restructure of a single team. No

g) Are there any negative equality impacts as a result of the proposal? Please complete the table below:

Select **Yes, No** or **Unknown** by clicking on the 'Choose an item' boxes below and enter text in the text boxes in the right-hand column:

Protected characteristics	1. Will the proposal discriminate?	2. Will the proposal undermine equality of opportunity?	3. Will the proposal have a negative impact on relations?	What evidence are you using to predict this impact?
Age	The CTS has some different conditions according to age	No	No	Described in Section 4
Disability	The CTS provides some additional support for disabled people	No	No	Described in Section 4
Gender reassignment	No	No	No	Described in Section 4
Marriage and civil partnerships ¹	No	N/A	N/A	Described in Section 4
Race	No	No	No	Described in Section 4
Religion/belief	No	No	No	Described in Section 4

¹ Only the requirement to have due regard to the need to eliminate unlawful discrimination in employment should be considered.

Pregnancy and maternity	No	No	No	Described in Section 4
Sexual Orientation	No	No	No	Described in Section 4
Sex/gender	No	No	No	Described in Section 4

Please list any opportunities in the proposal for advancing equality of opportunity for any of the protected characteristics.

These are described in section 4.

N/A

h) Please list any opportunities in the proposal for fostering good relations for any of the protected characteristics.

N/A

i) Is the proposal a strategy that lays out priorities in relation to activity and resources and likely to have a negative socio-economic impact on residents?

No

j) Do you anticipate any Safeguarding risks as a result of the proposal?

No

k) Do you anticipate any potential Human Rights breaches as a result of the proposal?

No

3. The policy, procedure, function, service activity or financial decision

a) Date full assessment started: 3/10/2022

b) Title of new or changed policy, procedure, function, service activity or financial decision being assessed?

Council Tax Support Scheme (CTSS) 2023/24

People on low incomes who cannot pay their Council Tax bill can receive CTS to help them.

As part of the Spending Review 2010, the Government announced that expenditure allocated to this localised scheme would be reduced by 10% from the subsidy previously provided for council tax benefit and any increase in expenditure above what is forecast by The Department for Communities and Local Government (DCLG) from that point on must be funded locally by the Council. In 2013/14, the council received in the region of £2.9 million less to give out in

support to claimants. This meant the council had to make savings or increase income to fund the shortfall. The Government also stipulated that people of pension credit age must be protected, which meant that the CTS reduction was directed exclusively at working age claimants and would have meant a reduction of around 18%-20% if the cuts were shared in equal proportions across all working age claimants. Originally, the Council chose to make up for this shortfall by introducing a standard reduction to all Council Tax Support recipients of 8.5%, by taking up the Government's offer of a temporary transitional grant and reducing the level of discounts that those with empty properties could apply for. The Government has subsequently withdrawn any transitional grant but the Council had decided to maintain the original level of support it provides to its CTS residents and funded this additional support wholly from its own funds.

The recommendation now is to retain the level of support of 95% to working age households by keeping the cap to 5%, as agreed for the 2022/23 CTS scheme. This will equate to 95% of the support that was available under the old council tax benefit. Supporting our residents to recover from the economic impacts of Covid-19 is a priority, whilst now helping residents deal with the impacts of cost of living issues. In 2020/21 and 2021/22 we helped all working age households entitled to CTS with a Covid-19 hardship rebate of up to £150 on their annual council tax bill. This was funded by Government grant in 2020/21 and by the Council in 2021/22, the Covid-19 hardship rebate will cease at the end of 2021/22. Increasing the maximum level of support available to working age households allows us to provide further financial assistance to our low income households, helping them to recover from the devastating impacts of the global pandemic, whilst working with them to improve their financial situation including their employment opportunities.

c) What is the profile of the current service users and residents impacted by the change?

It affects everyone in Islington who has to pay Council Tax which broadly speaking means that it affects all residents. The number fluctuates but there are about 146,000 households with a liability for Council Tax.

d) What is the profile of the workforce impacted by the change?

The workforce is not impacted.

e) How will the proposed change impact this profile?

Not applicable

4. Equality impacts and mitigations

No significant issues have arisen as to the impact of Islington's Council Tax Support Scheme since it was introduced in 2013 and the analysis provided in this section should be seen in this context.

Since the Council Tax Support Scheme (CTSS) relates to the distribution of money based on criteria relating to income, it is predominantly data relevant to these issues that has been analysed in order to assess the impact of the CTSS proposals on different groups.

Although it is difficult to update demographic data or information about population statistics without recent national survey data, there is no reason to believe that figures we refer to in this analysis have materially changed from the previous years'.

As the funding for the scheme has been cut by 10% by government and not increased subsequently despite demographic change, the scheme would tend to disadvantage at least some residents with protected characteristics and/or those living in poverty, unless money was found from other parts of the council budget to make up the shortfall. The Government has also stipulated that people of pension credit age must be protected, which means that the benefit paid to other CTS claimants would need to be reduced by an estimated 18%-20% if cuts were shared in equal proportions across all remaining recipients.

However, in order to keep the extent of the financial burden on our working-age CTS claimants low, the Council did not make an 18%-20% reduction but continued to limit the reduction to 8.5% up to 2021/22. This was changed to 5% for 2022/23.

During the Covid-19 period a range of support and financial assistance was provided to our low income and vulnerable households. This included the Covid-19 hardship rebate on council tax bills for working age households, increased local welfare provision support through our residents support scheme, help with food provision and payments of various grants to help with food, utilities, lost income due to self-isolation.

The council tax system holds very little data on most of the protected characteristics, including gender, disability and race. It has therefore been necessary to look at different local and national sources of data from different years in order to build a picture that can be used for this impact assessment.

The 2011 census shows that there are 206,100 residents in Islington and 96,100 households. This is 27,000 more than the 2001 census upon which much of the data in this assessment is based. Notwithstanding its shortcomings, the data is sufficient to get an idea of potential impacts arising from CTS.

Our CTS scheme incorporates full protection for older people against the previous council tax benefit scheme and mitigation for disabled people and large families. Applying the percentage reduction to the end of the benefit award (bottom slicing) rather than taking this from the liability (top slicing) helps people on partial benefit and there was a message from the public consultation that those on partial benefit are more concerned about the impact of the CTS. To illustrate this, in the case where the reduction is 5%:

1) for someone who was in receipt of £20 full CTB, whether the reduction in benefit was top sliced or bottom sliced the reduction is £1 (5%) leaving CTS of £19 for those previously receiving "full" benefit in this example;

2) however, in the case of someone who was previously on partial CTB because they had additional income from working, to reduce their benefit by top slicing would (if the starting point was £20) leave their CTS as £9 (£20 less £1 (5%) less £10 Excess Income = £9). But if

their partial benefit was reduced by bottom slicing instead this would leave their CTS as £9.50 (£20 less £10 Excess Income = £10. Taking 5% of this leaves £9.50). Therefore, choosing to bottom slice makes it better for those on partial benefit which supports the consultation findings.

There is also mitigation for those who might be deemed to be better off by allowing savings of up to £16,000 before someone is disqualified from receiving CTS (this is known as the "capital limit") and giving an additional discount of up to £100 to all pensioners over the state pension age, whether or not they currently qualify for CTS. Although the net effect of providing support to those deemed to be better off is that less money is available for others that may be in greater need, there are positive aspects to Islington's scheme. People who are not particularly well off but have accumulated savings will not be penalised and even if savings were limited to £8,000, because less than 200 claimants out of over 20,000 existing claimants have capital over this limit, the money that would have been available to others is relatively small. In relation to pensioners over state pension age, Islington's minimum CTS of £100 means that there will be no marginal cases of older pensioners who are not quite poor enough to receive the benefit but who are still financially fragile. This age group is likely to have less access to the labour market.

Compared to council tax payers who are not in receipt of CTS, there is a more favourable recovery regime for CTS. Even if a CTS council tax payer is summonsed, we will not use enforcement agents to recover the money and we will remit court costs if they agree to and keep up with a new schedule of payments [which the Council Tax service call Special Arrangements].

Catering for exceptional hardship

Additional support is available to the most vulnerable residents by way of a council tax welfare fund of £25,000 within the Council's Resident Support Scheme (RSS) to support cases of exceptional hardship resulting from additional council tax charges. This will be available on a time-limited basis to residents who apply and meet the hardship criteria. Money has been generated for this fund by removing the 10% discount on second homes in Islington and charging more council tax on empty homes.

In the first 6 months of 2023/24 over 25,000 claimants qualified for council tax support and there have been 23 applications for additional support, as a result of which £3,283 was awarded.

Further analysis by protected characteristic

Summary

Since the introduction of the CTS scheme there is no evidence that any particular group is particularly impacted.

Our welfare reform response team (iWork) and our IMAX teams have not reported issues with CTS.

By September 2013 - the first year of the scheme - we had collected 50.1% of council tax monies owed; by September 2015 we had collected 51.5%; by September 2018 we had collected 51.1%, by September 2019 we had collected 51.75% and by August 2020 we had

collected 56%. Overall, it appears that our council tax collection performance continues to be strong. There is evidence that working age CTS claimants are less likely to pay than any other type of council tax charge payer. This should be expected as this group are defined by a low income and the majority have previously been unused to paying anything towards Council Tax. The collection rate for 21/22 was helped by the COVID19 hardship fund awards.

Age

Key facts

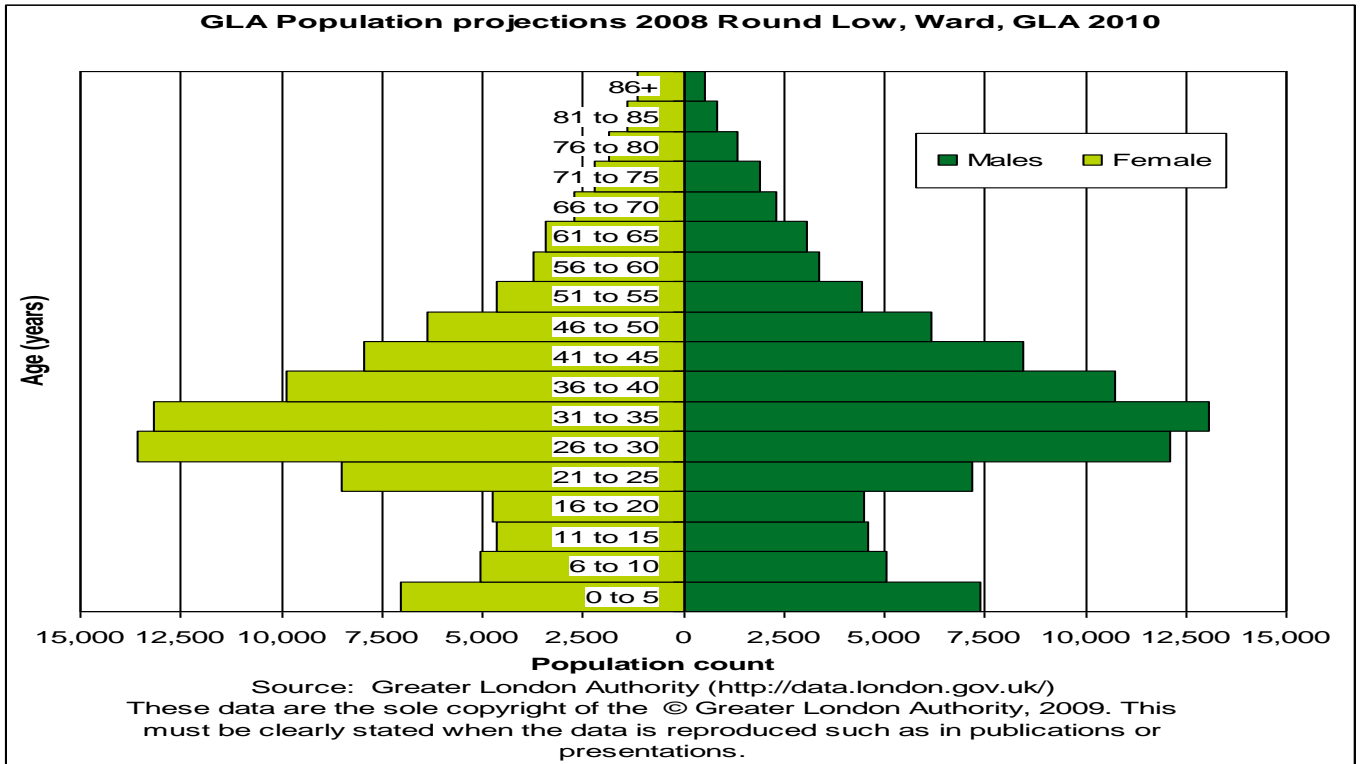
Older people

- 41% of over 65s in Islington are income deprived and 53% are in fuel poverty
- Pension poverty affects women more than men
- The older the pensioner the greater the likelihood to be living in a low income household.
- Pensioners living in a household headed by someone from a BME community² were more likely to be at the lower end of the income distribution curve.
- Disabled pensioners in households not claiming appropriate disability benefits were much more likely to be in a low income household.
- There are approximately 22,750 people aged 51 to 65 in Islington – evidence indicates that people in this age group are least likely to find another job if they become workless. Islington, alongside Hackney, Tower Hamlets and Newham have the highest proportion of pensioners receiving the Guarantee element of Pension Credit

Younger people

- There are approximately 800 known carers under the age of 19 in Islington.
- There are 1,575 residents aged 18 to 24 and 4,180 aged 25 to 49 claiming Job Seekers Allowance
- There are 5,100 residents aged 25 to 49 claiming Employment Support Allowance;

² In this context BME refers to the non-White population. Link:
http://research.dwp.gov.uk/asd/hbai/hbai2010/pdf_files/full_hbai11.pdf



Impact assessment

Older people of pension credit age are protected under the scheme, and those over state pension age will also continue to receive the £100 rebate. The proposals therefore do not lead to any financial impact on older people who currently receive the benefit or are eligible. From the information available, it is not possible to assess whether the scheme is accessible to older people (who may have a range of access needs) or their carers. Given needs are met once identified, it would be important to make very clear through a range of channels that information etc is available in other formats, and that staff and voluntary sector and community organisations can also provide support.

When it comes to age, much of national policy on this and related welfare reforms protects pensioners while working age benefit recipients experience cuts. The council proposals reinforce this distinction by retaining the £100 older person’s discount. Although it could be argued that this leads to disproportionately worse impacts on those of working age, national and local data on the number of older people living in poverty and not necessarily claiming benefits means that the council’s position is reasonable from an equality perspective. Furthermore, those in the over state pension age category are less likely to access, or have access to, the labour market to supplement their income than those of working age. People of working age, including young people, are only eligible for CTS where they have an additional need, for example because of a disability or they are on a low income. The cumulative impact of welfare reforms on this group is significant and eligible younger residents may not be aware of what they are entitled to. Communication methods more suited to younger people such as text messaging, social media etc, may be useful in raising awareness.

In retaining the maximum support to working age households by retaining the cap at 5% will allow us to continue to provide increased support to low income working age households.

Mitigation

Develop plans to ensure that information, support and advice is accessible and that the option to claim and ways to do so are well signposted by services and organisations in contact with potentially eligible residents and through proven communication channels.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement. In addition we will operate various benefit take-up campaigns to raise awareness in the community to claim entitlements, plus pro-actively target those who we believe should be entitled to additional benefit. In 2020/21 & 2021/22 we ran pension credit take-up campaigns that helped pensioners claim an additional £1.245m of annual benefit entitlement. We are running further campaigns in 2022/23.

Disability

Key facts:

- There are 26,327 households with one or more person with a limiting long-term illness
- 12,540 claim out of work sickness benefits (incapacity benefit, severe disablement allowance and employment and support allowance)
- There are 7,350 working age Islington residents claiming Disability Living Allowance (a non-means tested benefit available to employed or out-of-work disabled people) - 6,270 have been claiming for at least two years and 4,860 for at least 5 years.
- There are 2,240 people claiming Carer's Allowance (CA), of which 2,080 are of working age
- The employment rate amongst disabled people is 48.2%
- Nationally 50% earn less than half the mean earnings after adjusting for extra costs
- Twice as likely to live in poverty but less likely to be in low income if in a workless household
- Disabled pensioners in households not claiming appropriate disability benefits were much more likely to be in a low income household.

The public consultation responses in 2012 and 2016 provide indications that disabled people are concerned about being able to cope financially but the numbers of respondents where this kind of data appears is low. A relatively small number of disabled and non-disabled respondents volunteered the view that disabled people should pay less council tax, with a greater proportion of working age as opposed to pension age respondents expressing this view.

In respect of this characteristic, no significant issues have emerged during the operation of the CTS scheme.

Impact assessment

Disabled people are disproportionately likely to be poor, out of work and on benefits. They are disproportionately affected by welfare reform overall. It is estimated that those IB claimants who have already migrated to ESA Support Group will be £17 a week better off. However, 33% will be on ESA Work Related Activity Group and be £4 a week worse off and 18% will migrate to JSA and be £40 a week worse off.

Continuing the cap at 5% means that working age disabled people on low incomes will continue to get 3.5% more CTS than they did in previous years 2021/22 and before. Although the CTS scheme provides higher amounts for disabled people they still get 5% less than they did from council tax benefit in 2012. The higher costs of care, transport and general living combined with the labour market disadvantage faced by disabled people could make the reductions stemming from the CTS scheme difficult for them to cope with. However, while members of this group are often economically disadvantaged, the rationale of a universal rather than means tested approach was challenged at the disabled group workshop. Some disabled people may not need the extra financial support and the argument made was that looking at groups rather than more specific individual or household circumstances is too simplistic.

Mitigation options

The Council has limited the reduction in benefit for disabled people from 18% to 8.5% up to 2021/22. For 2022/23 the Council has changed the limit to 5% providing more support and giving people greater opportunity to adapt their financial circumstances.

Supporting those with long-term health conditions into employment is the best route out of poverty and is also recognised to be of benefit, particularly to people with mental health problems. We will have a particular focus on ESA claimants in the employment work of our iWork Team, utilising specific funding to increase the number of work coaches as well as continuing the work started under the Universal Services Delivered Locally trial.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement. We plan to have a specific focus on disability benefits in some future benefit take up campaigns, to help disabled residents claim all the benefits they are entitled to receive.

Race

Key facts:

- Employment
 - Non-white employment rate in Islington is 51.4%
 - Nationally, the rate is 59% for non-White compared to 72% for White people
 - Nationally 10% Indian and 15% White British men over 25 are not working compared with 30% to 40% for Bangladeshi, Pakistani, Black Caribbean and Black African. The high number of students explains much of the higher proportion for Black African. The ethnic profile of people starting to claim JSA in Feb 2010 showed that the proportion that were Black/Black British was 6 percentage points higher than their proportion in the 2001 census, while the proportion that were White was 22 percentage points below their proportion in the 2001 census.
- National data on earnings shows that those from Bangladeshi and Pakistani backgrounds are almost twice as likely to earn less than £7 per hour than those from Black African, Black Caribbean and White British backgrounds.
 - 48% Bangladeshi, 42% Pakistani
 - 27% Black African, 23% Black Caribbean
 - 25% White British

- Households below Average Income (HBAI) survey shows that children are much more likely to live in poverty if they are in a family headed by a BME parent, especially someone of Pakistani, Bangladeshi or Black Non-Caribbean origin.

The following table shows the ethnic distribution of families in Islington, differentiated between those who received Council Tax Benefit and those who did not.

	Yes - on CTB	Not on CTB	Grand Total	Yes - on CTB	Not on CTB	All
1 White British	2252	4950	7202	29%	38%	35%
2 Other White	597	1286	1883	8%	10%	9%
3 Turkish / Turkish Cypriot	503	242	745	6%	2%	4%
4 Kurdish	57	21	78	1%	0%	0%
5 Bangladeshi	355	333	688	5%	3%	3%
6 Asian	131	218	349	2%	2%	2%
7 Black Caribbean	328	483	811	4%	4%	4%
8 Black Somali	324	187	511	4%	1%	2%
9 Black African	480	649	1129	6%	5%	5%
10 Black Other	345	424	769	4%	3%	4%
11 Chinese	53	92	145	1%	1%	1%
12 Mixed	882	1469	2351	11%	11%	11%
13 Other	235	386	621	3%	3%	3%
14 Not Obtained / Refused	78	183	261	1%	1%	1%
15 Unknown*	1060	1564	2624	14%	12%	13%
Missing	155	416	571	2%	3%	3%
Grand Total	7835	12903	20738	100%	100%	100%

Reviewing CTS take-up within this cohort, the biggest discrepancy is among 'white British' residents who are significantly under-represented, and 'other white' who are slightly under-represented. Bangladeshi, Black Somali, Turkish/ Turkish Cypriot and to a slightly lesser extent Black African are all over-represented. These figures are in line with what might be expected given the employment data briefly stated earlier, which indicate relative levels of poverty in different communities.

- Refugees & Asylum Seekers
 - Data from 2002 indicates a 29% employment rate nationally among refugee and asylum seekers, which is much lower than average for BME people. (Bloch 2002)
 - From a small Islington sample, the data suggests those who work are in low paid, low-skilled jobs

- Gypsies & Travellers

There are estimated to be 55 gypsy and traveller families in Islington, mostly living in houses. Although this community is small, its challenges are acute, with significantly disproportionate outcomes compared to any other group. For example, gypsies and travellers have the worst health outcomes of any racial or ethnic community and are twenty times more likely to experience the death of a child.

The consultation responses did not point to any significant issues emerging based on ethnic background and none have emerged during the operation of the CTS scheme.

Impact assessment

Welfare reforms, the economic situation and historic inequalities in employment together are likely to result in lower incomes for Black and Minority Ethnic (BME) residents, who will therefore be disproportionately affected by the reduction in CTS. Known barriers such as limited English and lack of familiarity with the system need to be mitigated by improving accessibility, especially for the most disadvantaged groups.

Mitigation options

Working through partners as well as using our own resources, we will ensure that access to CTS, as well as the Resident Support Scheme (RSS), is made known to those in greatest need, so that eligible residents from all ethnic backgrounds receive support.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Religion/Belief

Key facts:

- Muslims experience much higher rates of unemployment (15.4%) and economic inactivity (51.4%) compared with the average for all groups (6.5% and 32.4%)
- National research also suggests a “Muslim penalty” in employment, especially for women

Impact assessment

From available data there appear to be no significant negative impacts that can be distinguished from religion/belief. Residents are not adversely impacted by the scheme by virtue of their religion/ belief (or absence thereof).

Mitigation options

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Gender and relationships

This section covers gender, marriage, civil partnerships and gender re-assignments.

Key facts:

- Employment rate: 71.7% men, 63.8% women
- The majority of lone parents of children living in poverty are women
- Incapacity benefit: 5,320 men (57%), 4,030 women (43%)
- Over 75% Bangladeshi & Pakistani women not in paid work
- Nationally, the number of women not working is decreasing while the number of men not working is increasing, however the difference between the sexes of those aged 18 to 24 is low.

2016 and 2021 consultation responses did not point to any significant issues emerging based on gender and none have emerged during the operation of the CTS scheme.

Impact assessment

There appear to be no significant negative impacts for most people in this group due to any of these protected characteristics. The arrival of a new child increases household expenditure but this fact is already acknowledged in existing regulations which retain family premiums and disregard child benefit as income.

Mitigation options

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Pregnancy, maternity and family life

Key facts:

- There are 20,387 households with dependent children in Islington, of which 6,859 (34%) headed by a lone parent
 - 8,702 with children aged 0 to 4
 - 7,204 no adult working (35%)
- 46% living in poverty – 2nd highest nationally
- Most significant factors are lone parent, BME parents, disability, 3 or more children
- Of all the children in Islington HB/CTS data shows that:
 - 39% (14,867) are in families on out of work benefits
 - 15.2% (5,746) are in working families on incomes low enough to qualify for HB/CTB
 - 45.8% (17,348) are in families sufficiently well off enough not to need to claim HB/CTB

Table below showing Information from Children Services showing the number of households in Islington with dependent children:

Households Below Average Income (HBAI) survey shows that children are much more likely to

lone parents		all children	
Row Labels	Yes - on CTB	Not on CTB	Grand Total
lone parent	6636	5564	12200
two parents	9903	17669	27572
Unknown	16	81	97
Grand Total	16555	23314	39869

lone parents		households	
Row Labels	Yes - on CTB	Not on CTB	Grand Total
lone parent	3489	3114	6603
two parents	4332	9722	14054
Unknown	14	67	81
Grand Total	7835	12903	20738

low income		all children	
Row Labels	Yes - on CTB	Not on CTB	Grand Total
low income	16103	8025	24128
not low income	452	15289	15741
Grand Total	16555	23314	39869

low income		households	
Row Labels	Yes - on CTB	Not on CTB	Grand Total
low income	7626	3623	11249
not low income	209	9280	9489
Grand Total	7835	12903	20738

live in poverty if they are in a family headed by a BME parent, especially someone of Pakistani, Bangladeshi or Black Non-Caribbean origin; living in overcrowded accommodation; with three or more children; headed by a lone parent or with a disabled family member.

There are 1,400 households with 2,420 child dependents (aged up to 18) claiming IB or Severe Disablement Allowance.

It is estimated that the vast majority of Islington households with children, whose housing will become unaffordable due to LHA changes and the overall Benefit Cap will be workless households.

In this information, over 55% (11,306) of all households with children were on housing and/or council tax benefit, but a far higher proportion of these were headed by lone parents than the population as a whole: 59% (4,036) of lone parent households on HB/CTB compared with 37% (5,045) of the couple households

The consultation responses segmented by those with and without children indicated that concerns about family finances were high for both groups, but that those with four or more children were particularly concerned, and those with children were more likely to raise the issue, unprompted, of struggling with money because they have children to care for. However, it should be noted that the actual number of responses received voicing these concerns was very low and in respect of this characteristic no significant issues have emerged during the operation of the CTS scheme.

Impact assessment

The council has in place a number of measures to support families with children – a key issue in looking at poverty in the borough as the data above indicate. By retaining all family premiums and applicable amounts, the council recognises that families require a higher level of income to support their household.

It has been decided not to cap benefit at the higher bands and their benefit will be based on the actual charge for the property. This means that there will be no adverse impact for families in larger properties because they are in a higher band. They will be no worse off because they are in a higher banded property. If benefit was capped at band D or E, benefit could only be paid up to this band and the customer would have to pay the full amount above that, which might mean they incur hundreds of pounds of new costs.

Mitigation options

As with other affected groups, it is important that take up is encouraged and that families in greatest need are provided with additional support through the RSS.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Sexual Orientation

Key facts:

- 84% LGBT economically active compared to the 75% population

- Economic activity is more likely to continue beyond age 55
- 73% female and 79% men on incomes above the average for London
- 3% live in households with children under 18
- 10% live in social housing compared to 49% of the overall Islington population
- 37% experience mental health problems at some point

Source: Revealing LGBT Islington study 2005

Impact assessment

The data indicates that LGBT people tend to be economically better off than other groups, as they are more likely to be in work, work for longer and be on higher salaries. This group may be more at risk of specific conditions, such as mental health problems or being HIV+, than the general population, but where this is the case then their situation is addressed in the disability section. There are no negative impacts associated with sexual orientation triggered by this scheme.

Mitigation options

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

b) Mitigation for people with protected characteristics

- Retaining the cap at 5% despite no longer having a transitional grant from government to cover this and many local authorities moving away from this level of cap and passing the full extent of the government council tax benefit funding reduction to residents. This will ensure that those with protected characteristics are not impacted by the full possible extent of the government funding reduction and provides them with more support than the scheme in previous years.
- The regulations of the council tax benefit scheme have been retained, and these already make extra provision for disabled people and families by:
 - retaining all disability premiums so that the level of allowable income before tapers are introduced is higher than for the average working age person;
 - continuing to disregard as income certain disability benefits such as Disability Living Allowance (DLA) and War Disablement Allowance;
 - ensuring that no non-dependent deductions apply if a person is in receipt of DLA (care component) therefore allowing him/her to qualify for a disability premium;
 - retaining all family premiums and applicable amounts in recognition of the fact that families need a higher level of income to support their household;
 - continuing to disregard Child Benefit as income in the calculation of benefit entitlement – this means that there is an allowance for each child and a premium for disabled children.

- Further to the original regulations we agreed to afford recipients of Personal Independence Payments (PIP) the same favourable premiums and allowances in the CTS scheme as we did DLA recipients, from the start date of the new benefit.
- The regulations also encourage moving into employment by:
 - offering a 4 week guaranteed payment of existing benefit level to those attaining work
- The re-use of the existing regulations also:
 - supports and promotes an incentive for saving by retaining the savings limit of £16,000 that exists within the current scheme
 - does not cap the reduction/support for higher property bands to ensure that there is no adverse impact on families in higher banded properties

In addition, current practice in Islington to support people with accessibility requirements will be retained. Therefore, documents are made available in different formats such as large print, audio and Braille and once known, the requested format will be provided as a matter of course. Translation services and interpreting services are also available when requested.

5. Socio-economic, Safeguarding and Human Rights impacts

a) Socio-economic impacts

Socio-economic disadvantage is not a protected characteristic but is a consideration included in the resident impact assessment given the significant income inequality within the borough. The previous Council Tax Benefit scheme was a means tested benefit available to households on a low income. Therefore, all recipients would be considered to be at a socio-economic disadvantage, particularly lone parents (more likely to be women), part time workers (more likely to be women) and large households (more likely to be from BME backgrounds). Currently there is little or no Council Tax Benefit data breakdown on the following protected characteristics: gender reassignment/identity, marriage and civil partnership, pregnancy and maternity, religion/belief or sexual orientation. During the lead up to the new CTS scheme, extensive consultation and communications were undertaken. Raising the awareness of residents of the CTS scheme. We have made available Council Tax payment options that include 2 weekly instalments over 12 months and direct debits have been widely publicised. The service will work with debt counselling and financial inclusion provisions within the borough. Islington is increasing the employment and skills provision in the borough through an Employment unit called iWork and is leading on a trial employment support initiative called "Universal Support Delivered Locally" to work with residents affected to increase their skills and the potential for them to get into employment. Actions to minimise causing further hardship to people already on low incomes have been identified in earlier sections.

b) Safeguarding risks

No safeguarding issues for children or vulnerable adults were identified.

c) Human Rights breaches

No human rights issues were identified.

6. Summary: core findings of the RIA

a) Key impacts of the **proposal**:

- Since the Council Tax Support Scheme (CTS) relates to the distribution of money based on criteria relating to low income then all residents on low income who are liable for council tax are affected by this proposal.
 - Since the Council is using its own resources to limit the extent of the reduction in benefit to 5% then all residents are impacted by this proposal as they all have a stake in how the Council uses its limited resources.
-

b) **Equality impacts** of the proposal:

- The impact on all working age CTS claimants and potential claimants is that they will now have to contribute 3.5% less towards their Council Tax bill than they would have done up to March 2022. By not changing the agreed council tax support scheme since its inception, affected residents have not been subject to any further subsequent disadvantage. The impact on pension age CTS claimants is probably negligible as they have been protected from the 5% reduction.
 - No other impacts specific to people with protected characteristics have emerged during the previous 12 months' operation of the CTS scheme.
 - No complaints or appeals specific to the CTS scheme have been received.
 - The percentage of collection rates for 2021/22 compared to 2020/21 are very similar.
-

c) Safeguarding **risks** identified:

- None
-

d) Potential Human Rights breaches identified:

- None
-

e) **Monitoring:**

Issue to be monitored	Responsible person or team
The nature of any appeals against the operation of the CTS scheme	Appeals & Complaints (Community Financial Resilience)
The nature of any complaints about the operation the CTS scheme	Appeals & Complaints (Community Financial Resilience)
The difference in the council tax collection rates between CTS working age and all other council tax charge payers.	Andrew Spigarolo (Head of Service; Revenues)
The volume of requests made to the RSS for help to pay council tax	Eileen Broderick(IMAX & RSS Manager, Community Financial Resilience)

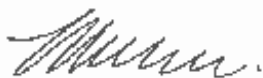
Additional items to be monitored:

- None

Please sign and date below to confirm that you have completed the Resident Impact Assessment in accordance with the guidance and using relevant available information. (A signature must also be obtained from a Service Head or higher. If this is a Corporate Resident Impact Assessment, it must be signed by a Corporate Director).

Staff member completing this form:

Head of Service or higher:




Signed:

Signed:

Date: 3/10/22

Date: 3/10/22

Appendix C

The Council is determined to tackle poverty and reduce inequality in Islington. As a result, it makes extensive efforts to support especially those who are vulnerable or less well-off to thrive in the borough. By way of illustration, this appendix provides a non-exhaustive list of some of the types of financial support and other discounts which Islington Council offers residents at different stages of their lives.

From the cradle to the grave – a lifetime of support

What we offer	Reason
Early years childcare subsidy	Making early education available for the borough's children All 3 and 4 year olds, and some 2 year olds, can get free early learning or childcare, usually 15 hours a week for 38 weeks of the year. Some working families can get up to 30 hours a week of free childcare for their 3 and 4 year olds
Free school meals for all primary school children	Support children's health and education whilst tackling poverty
Holiday activities and food	Tackling holiday hunger among children
School uniform grants	Providing children with necessary clothing for school
11 free cultural experiences for Islington schoolchildren by Year 11	Providing access to the wealth of cultural activity available in the borough
100 hours experience of the world of work by 16	Preparing our children for employment
Post-16 education bursary	Enabling continued studies for qualifying Islington students past the age of 16 by awarding a £300 bursary
Council Tax exemption for foster carers	Encouraging foster carers for children and adults by awarding a full exemption
Council Tax exemption for care leavers	Helping care leavers to transition into independent living up to the age of 25 by awarding a full exemption
Disabled facilities grant	Enabling adults and children to lead independent lives through adaptations in their homes
Home renovation grant	Making necessary major repairs
Accidents in the home grant	Preventing likely accidents in the home through repairs

Home from hospital grant	Supporting home repairs that prevent people leaving hospital from planned treatment or an emergency
Hoarding grant	Helping vulnerable clients in private dwellings with significant hoarding
Dementia grant	Providing facilities or minor adaptations to the home
Armed forces support	Disregarding war widows or war disablement allowance to increase housing benefit, council tax support and social care assessments
Disabled provision grant	Creating accommodation for disabled people through private housing partnerships
Empty property grant	Working with owners/landlords to create new accommodation through private housing partnerships
Housing under-occupation grant	Helping people moving from homes to allow larger families to move in
Housing rent-deposit scheme	Paying rent deposits for people at risk of homelessness
Discretionary Housing Payments	Providing, through the Resident Support Scheme, extra housing cost support for housing benefit or universal credit claimants
Crisis Support	Providing, through the Resident Support Scheme, crisis support for people needing assistance with food, some clothing and energy charges
Community Care Support	Providing, through the Resident Support Scheme, support for independent living in the form of items such as white goods, beds and furniture
Council Tax Welfare Support	Providing, through the Resident Support Scheme, support for people struggling to pay their council tax
Concessionary leisure memberships	Providing a reduction for nearly half of the 23,000 leisure membership
Safe and warm grant	Providing boiler replacement, predominantly for the over 60s
Council Tax older people's discount	Reducing by £100 the council tax bill for all over State Pension age

Finance Department
7 Newington Barrow Way
London N7 7EP

Report of: Corporate Director of Resources

Meeting of: Council

Date: 8 December 2022

Ward(s): All

Subject: Treasury Management Mid-Year Review

1. Synopsis

- 1.1. This report reviews the activities of the Council's Treasury Management function over the half year period ended 30 September 2022. The month of September has been a challenging environment with volatile interest rate and gilt markets.
- 1.2. Over the reporting period, all treasury management (TM) activities have been carried out in accordance with the approved limits and the prudential indicators (PI) set out in the Council's Treasury Management Strategy statement with the exception of one, the short term borrowing indicator. 7% of the Authority's borrowing was due in under 12 months as apposed to the minimum 12% set out in the prudential indicators. This is detailed in paragraphs 4.38 – 4.42.
- 1.3. Treasury Management comprises:
 - 1.3.1. Managing the Council's borrowing to ensure funding of the Council's future capital programme is at optimal cost;
 - 1.3.2. investing surplus cash balances arising from the day-to-day operations of the Council to obtain an optimal return while ensuring security of capital and liquidity

2. Recommendations

- 2.1. To note the Treasury Mid-Year Review
- 2.2. To note the prudential indicator breach

3. Background

- 3.1 In February 2002, Islington Council adopted the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice* (the CIPFA Code) which requires us to approve treasury management semi-annual and annual reports.
- 3.2 Treasury risk management at the Council is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2017 Edition* (the CIPFA Code) which requires the Council to approve a treasury management strategy before the start of each financial year and, as a minimum, a semi-annual and annual treasury outturn report. This report fulfils the Authority's legal obligation under the Local Government Act 2003 to have regard to the CIPFA Code.
- 3.3 The 2017 Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by full Council covering capital expenditure and financing, treasury management and non-treasury investments. The Council's Capital Strategy, complying with CIPFA's requirement, was approved by full Council on 3rd March 2022.

4. Detailed Report

- 4.1 On 31st March 2022, the Authority had net borrowing of £ 148.77m arising from its revenue and capital income and expenditure. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. These factors are summarised in Table 1 below.

Table 1: Balance Sheet

	31.3.22 Actual £m
General Fund CFR	
HRA CFR	
Total CFR	709.80
Less: *Other debt liabilities	(82.73)
Loans CFR	627.07

External borrowing	(274.27)
Internal (over) borrowing	352.80
Less: Usable reserves	(312.17)
Less: Working capital	(163.40)
Net [borrowing / investments]	(148.77)

* finance leases, PFI liabilities and transferred debt that form part of the Authority's total debt

4.2 On 30th September 2022, the Council had net borrowing of £141.0m arising from its revenue and capital income and expenditure. The treasury management position as at 30th September 2022, the change over the six months is shown in Table 2.

Table 2: Treasury Management Summary

	31.3.22 Balance £m	Movement £m	30.9.22 Balance £m	30.9.22 Rate %
Long-term borrowing	264.27	1.000	265.60	4.05
Short-term borrowing	10.000	(10.00)	0.000	0.00
Total borrowing	274.27	(11.00)	265.60	4.05
Long-term investments	10.000	10.00	20.000	0.55
Short-term investments	115.500	(17.00)	98.500	1.40
Total investments	125.500	34.900	118.500	1.35
Net [borrowing / investments]	148.774	(30.000)	141.009	3.08

Economic Background

4.3 The Bank of England's Monetary Policy Committee (MPC) sets monetary policy to meet the 2% inflation target, and in a way that helps to sustain growth and employment. At its meeting ending on 21 September 2022, the MPC voted to increase the Bank of England Base Rate by 0.5 percentage points, to 2.25%. Five members voted to raise the Bank Rate by 0.5 percentage points, three members preferred to increase the Bank Rate by 0.75 percentage points, to 2.5%, and one member preferred to increase the Bank Rate by 0.25 percentage points, to 2%. The Committee also voted unanimously to reduce the stock of purchased UK government bonds, financed by the issuance of central bank reserves, by £80 billion over the next twelve months, to a total of £758 billion, in line with the strategy set out in the minutes of the August MPC meeting.

4.4 Twelve-month CPI inflation fell slightly from 10.1% in July to 9.9% in August, with the release triggering the exchange of open letters between the Governor and the Chancellor of the Exchequer that is being published alongside this monetary policy announcement. Given the Energy Price Guarantee, the peak in measured CPI inflation is now likely to be lower than projected in the August Report, at just under 11% in October. Nevertheless,

energy bills will still go up and, combined with the indirect effects of higher energy costs, inflation is expected to remain above 10% over the following few months, before starting to fall back.

Arlingclose View:

- 4.5 Q2 GDP growth surprised to the upside, with the office for national statistics (ONS) revising the first estimate of -0.1% to +0.2%, driven by upward revisions to household and government spending. While the revision suggests that the UK economy has avoided a technical recession so far, growth remains soft and is on a downward track. We expect growth to be negative in Q3 and thereafter due to the heightened impact of the rising cost of living, higher interest rates and slowing global growth. However, this will not stop the BoE tightening monetary policy further to combat perceived inflationary pressures.

Borrowing

- 4.6 CIPFA's 2021 Prudential Code is clear that local authorities must not borrow to invest primarily for financial return and that it is not prudent for local authorities to make any investment or spending decisions that will increase the capital financing requirement, and so may lead to new borrowing, unless directly and primarily related to the functions of the Authority.
- 4.7 PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the Authority intends to avoid this activity in order to retain its access to PWLB loans.
- 4.8 The 2022/23 Treasury Management Strategy sets out an operational borrowing limit of £413.5m and maximum borrowing limit of £463.7m for the year. As at 30th September there is still a potential for the Council to borrow up to a further £147m, this level of borrowing has been revised due the current level of capital programme slippage. This matter is being closely monitored through the Council's 5-year capital programme model and the cash flow model.
- 4.9 As outlined in the treasury strategy, the Authority's chief objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Authority's long-term plans change being a secondary objective. The Authority's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio.
- 4.10 Over the April-September period short term PWLB rates rose dramatically, particular in late September after the Chancellor's 'mini-budget' prompted a fall in sterling and rise in

market interest rate expectations. PWLB Interest rates rose by over 2% during the period in both the long and short term. As an indication the 5-year maturity certainty rate rose from 2.30% on 1st April to 5.09% on 30th September; over the same period the 30-year maturity certainty rate rose from 2.63% to 4.68%. Although interest rates across the board have risen, short-term borrowing from other local authorities remains at lower interest rates than long term borrowing.

- 4.11 In keeping with these objectives, £20m new long term borrowing was undertaken, while £18.67m of existing long term loans allowed to mature without replacement, in addition to £10m of short term borrowing that matured. This strategy enabled the Authority to reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk.
- 4.12 The £20m of borrowing was undertaken in June, before the significant PWLB rate hikes, at a rate of 3.26% over 50 years. This proactive borrowing decision saved the authority £330k per annum in interest expense compared with the latest available rate of 4.91%.
- 4.13 The Council has an increasing CFR due to the capital programme and an estimated borrowing requirement as determined by the Liability Benchmark which also takes into account usable reserves and working capital. Having considered the appropriate duration and structure of the Council's borrowing need based on realistic projections, the Council has not taken on any new long-term loans because of its considerable cash balance.

Borrowing Update

- 4.14 The Authority currently holds £265.6 million of loans, a reduction of £8.67 million from the previous year, as in line with the strategy to borrow only if required hence use internal resources in lieu of borrowing despite the increase in rates, during the half year the Authority considered it to be more cost effective in the near term to either use internal resources and short to medium term borrowing to minimise the "cost of carry". Outstanding loans on 30th September 2022 are summarised in Table 3 overleaf:

Table 3: Borrowing Position

	31.3.22 Balance £m	Net Movement £m	30.9.22 Balance £m	30.9.22 Weighted Average Rate %	30.9.22 Weighted Average Maturity (years)
Public Works Loan Board	223.274	11.332	234.606	4.3434	20.23
Banks (LOBO)	0.000	0.000	0.000	0.0000	0.00
Banks (fixed-term)	0.000	0.000	0.000	0.0000	0.00
Local authorities (long-term)	41.000	(10.000)	31.000	1.7919	1.76
Local authorities (short-term)	10.000	(10.000)	0.000	0.0000	0.00
Total borrowing	274.274	(8.668)	265.606	4.0456	18.07

4.15 There remains a strong argument for diversifying funding sources, particularly if rates can be achieved on alternatives which are below gilt yields + 0.80%. The Authority will evaluate and pursue these lower cost solutions and opportunities with its advisor Arlingclose.

Forward starting loans

4.16 To enable certainty of cost to be achieved without suffering a cost of carry in the intervening period, the Authority may arrange forward starting loans with fixed interest rates of for the delivery of cash a specified future year date. The Authority has not actively pursued this option at this time and does not seem prudent with rates at their current levels.

Other Debt Activity

4.17 After £13.3m repayment of prior years' Private Finance Initiative liabilities, total debt other than borrowing stood at £82.3m on 30th September 2021, taking total debt to £347.9.

Treasury Investment Activity

4.18 CIPFA revised TM Code defines treasury management investments as those which arise from the Authority's cash flows or treasury risk management activity that ultimately represents balances which need to be invested until the cash is required for use in the course of business.

4.19 The Authority holds invested funds, representing income received in advance of expenditure plus balances and reserves held. During the year, the Authority's investment balances ranged between £100 and £150 million due to timing differences between income and expenditure. The investment position is shown in table 4 below.

Table 4: Treasury Investment Position

	31.3.22 Balance £m	Net Movement £m	30.9.22 Balance £m	30.9.22 Income Return %
Government (incl. local authorities)	125.5	(29.0)	96.5	1.01
MMF	0.00	17.0	17.0	2.05
UK Banks	0.0	5.0	5.0	4.30
Total investments	125.5	(7.0)	118.5	1.35

4.20 Both the CIPFA Code and government guidance require the Authority to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Authority's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

4.21 The increases in the Bank Rate over the period under review, and with the prospect of more increases to come, short-dated cash rates, which had ranged between 0.7% - 1.5% at the end of March, rose by around 1.5% for overnight/7-day maturities and by nearly 3.5% for 9-12 month maturities.

4.22 By end September, the rates on DMADF deposits ranged between 1.85% and 3.5%. The return on the Council's sterling low volatility net asset value (LVNAV) Money Market Funds ranged between 0.9% - 1.1% p.a. in early April and between 1.8% and 2.05% at the end of September.

4.23 The progression of risk and return metrics are shown in the extracts from Arlingclose's quarterly investment benchmarking in Table 5 below.

Table 5: Investment Benchmarking – Treasury investments managed in-house

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (days)	Rate of Return %
31.03.2022	4.28	AA-	0%		0.28
30.06.2021	4.61	A+	9%	157	0.36
Similar LAs	4.38	A+	71%	32	1.01
All LAs	4.39	AA-	64%	16	0.92

Non-Treasury Investment

- 4.24 The definition of investments in CIPFA's revised 2021 Treasury Management Code covers all the financial assets of the Authority as well as other non-financial assets which the Authority holds primarily for financial return. Investments that do not meet the definition of treasury management investments (i.e. management of surplus cash) are categorised as either for service purposes (made explicitly to further service objectives) and or for commercial purposes (made primarily for financial return).
- 4.25 Investment Guidance issued by the Department for Levelling Up Housing and Communities (DLUHC) and Welsh Government also includes within the definition of investments all such assets held partially or wholly for financial return.
- 4.26 The Council lends money to its subsidiaries, local businesses, local charities, local residents and its employees to support local public services and stimulate local economic growth.
- 4.27 The Council has lent £0.050m to its wholly owned subsidiary, Islington Limited (iCo), at market rate. The loan serves to support the working capital of iCo where the timings of its payments and receipts do not coincide. In addition, as at 31/03/2022, the Council had lent £0.642m (including accrued interest) to three private companies responsible for managing schools under the Building Schools for the Future programme (Transform Islington Phase 1 Holdings Limited, Transform Islington Phase 2 Holdings Limited and Transform Islington Limited). All loans were issued at market rates. Where loans are advanced at below market rates they are classed as 'soft loans'. As at 31/3/2022 the Council had also issued around £1.204m of soft loans, mainly to employees (e.g., travel season ticket, gym membership, home computer loans).
- 4.28 The Council invests in the shares of its subsidiaries and local businesses to support local public services and stimulate local economic growth. The Council holds equity investments in Islington Limited (iCo), a wholly owned subsidiary providing local services, and minority (10%) equity investments in three private companies responsible for managing schools under the Building Schools for the Future programme (Transform Islington Phase 1 Holdings Limited, Transform Islington Phase 2 Holdings Limited and Transform Islington Limited). The fair value of these shares is nil, and the shares are not traded in an active market. The Council has no current plans to dispose any of these shareholdings.
- 4.29 The Council invests in local and regional, commercial property with the intention of making a profit that will be spent on local public services. The market value of all such properties as at 31/3/2022 was £39.2m. In 2021/22, rental income from investment property was £2m against direct operating expenditure arising from investment property of £0.8m.

Compliance

- 4.30 The Corporate Director of Resources reports that all treasury management activities undertaken during the period complied fully with the CIPFA Code of Practice and the Authority's approved Treasury Management Strategy. Compliance with specific investment limits is demonstrated in table 7 below.
- 4.31 Compliance with the authorised limit and operational boundary for external debt is demonstrated in table 7 below.

Table 7: Debt Limits

	H1 Forecasted	30.9.22 Actual	2022/23 Operational Boundary £m	2022/23 Authorised Limit £m	Complied? Yes/No
Borrowing	363.7	265.6	413.526	463.526	Yes
PFI and Finance Leases	82.36	82.36	83.461	88.461	Yes
Total debt	446.06	347.96	496.987	552.021	Yes

- 4.32 Since the operational boundary is a management tool for in-year monitoring it is not significant if the operational boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

Treasury Management Indicators

- 4.33 The Authority measures and manages its exposures to treasury management risks using the following indicators.
- 4.34 **Security:** The Authority has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Table 8: Credit Ratings

	30.9.22 Actual	2022/223 Target	Complied?
Portfolio average credit rating	A+	A+	Yes

- 4.35 **Liquidity:** The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling one-month period, without additional borrowing.

Table 9: Liquidity of investments

	30.9.22 Actual	2022/23 Target	Complied?
Total cash available within 1 months	£32m	£25m	Yes

- 4.36 **Interest Rate Exposures:** This indicator is set to control the Authority's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interests was:

Table 10: Interest Rate risk (income)

Interest rate risk indicator	30.9.22 Actual	2022/23 Limit	Complied?
Upper limit on one-year revenue impact of a 1% <u>rise</u> in interest rates	£0.7m	£5.904m	Yes
Upper limit on one-year revenue impact of a 1% <u>fall</u> in interest rates	£0.3m	£2.503m	Yes

- 4.37 The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.

- 4.38 **Maturity Structure of Borrowing:** This indicator is set to control the Authority's exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

Table 11: Maturity Structure

Refinancing rate risk indicator	30.9.22 Actual	Upper Limit	Lower Limit	Complied?
Under 12 months	7%	100%	12%	No
12 months and within 24 months	6%	100%	5%	Yes
24 months and within 5 years	17%	100%	16%	Yes
5 years and within 10 years	11%	100%	7%	Yes
10 years and above	59%	100%	20%	Yes

- 4.39 Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

- 4.40 Although the treasury indicators are in breach due to the minimum levels of short-term borrowing not being reached, this has been a deliberate strategic decision to the benefit of the Authority. As in line with the strategy to borrow only if required, there was very little requirement to borrow due to the increased availability of internal resources. No short-term borrowing was necessary due to robust cashflow monitoring.

- 4.41 Heightened interest rate levels have led to a preference to avoid short-term borrowing during the year compared with the forecasts from earlier this year. Borrowing an additional £15m to meet the indicator would cost the Authority in excess of £600k per annum.
- 4.42 Given the current volatile interest rate environment, officers will review the indicators for 2023/24. A more suitable set of benchmarks will be used to appropriately manage refinancing risk without leading to adverse financial outcomes, which will likely include reducing this indicator to zero.
- 4.43 **Principal Sums Invested for Periods Longer than a year:** The purpose of this indicator is to control the Authority's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end were:

Table 12: Amounts invested for more than one year

	2022/23	2023/24	2024/25
Actual principal invested beyond year end	£10m	£0	£0
Limit on principal invested beyond year end	£30m	£20m	£20m
Complied?	Yes	Yes	Yes

5. Implications

5.1. Financial Implications

- 5.1.1. The report is wholly financial in nature.

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

- 5.2.1. There are no environmental considerations.

5.3. Equalities Impact Assessment

- 5.3.1. 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.

5.3.2. An Equalities Impact Assessment is not required in relation to this report, as it does not impact individuals.

Appendices:

Appendix 1: External context

Final report clearance:

Signed by:

Corporate Director of Resources

Date: 06 October 2022

Report Author: Jeannette Mckenzie-Taylor, Treasury & Pension Investment Manager

Tel: 0207 527 2614

Email: jeannette.mckenzie-taylor@islington.gov.uk

Financial Implications Author: Matthew Hopson, Deputy Director of Finance (Corporate)

Tel:

Email: matthew.hopson@islington.gov.uk

Appendix 1

External Context

Economic background

The ongoing conflict in Ukraine has continued to put pressure on global inflation and the economic outlook for UK and world growth remains weak. The UK political situation towards the end of the period following the 'fiscal event' increased uncertainty further.

The economic backdrop during the April to September period continued to be characterised by high oil, gas and commodity prices, ongoing high inflation and its impact on consumers' cost of living, no imminent end in sight to the Russia-Ukraine hostilities and its associated impact on the supply chain, and China's zero-Covid policy.

Central Bank rhetoric and action remained robust. The Bank of England, Federal Reserve and the European Central Bank all pushed up interest rates over the period and committed to fighting inflation, even when the consequences were likely recessions in those regions.

UK inflation remained extremely high. Annual headline CPI hit 10.1% in July, the highest rate for 40 years, before falling modestly to 9.9% in August. RPI registered 12.3% in both July and August. The energy regulator, Ofgem, increased the energy price cap by 54% in April, while a further increase in the cap from October, which would have seen households with average energy consumption pay over £3,500 per annum, was dampened by the UK government stepping in to provide around £150 billion of support to limit bills to £2,500 annually until 2024.

The labour market remained tight through the period but there was some evidence of easing demand and falling supply. The unemployment rate 3m/year for April fell to 3.8% and declined further to 3.6% in July. Although now back below pre-pandemic levels, the recent decline was driven by an increase in inactivity rather than demand for labour. Pay growth in July was 5.5% for total pay (including bonuses) and 5.2% for regular pay. Once adjusted for inflation, however, growth in total pay was -2.6% and -2.8% for regular pay.

With disposable income squeezed and higher energy bills still to come, consumer confidence fell to a record low of -44 in August, down -41 in the previous month. Quarterly GDP fell -0.1% in the April-June quarter driven by a decline in services output, but slightly better than the 0.3% fall expected by the Bank of England.

The Bank of England increased the official Bank Rate to 2.25% over the period. From 0.75% in March, the Monetary Policy Committee (MPC) pushed through rises of 0.25% in each of the following two MPC meetings, before hiking by 0.50% in August and again in September. August's rise was voted by a majority of 8-1, with one MPC member preferring a more modest rise of 0.25%. The September vote was 5-4, with five votes for an 0.5% increase, three for an 0.75% increase and one for an 0.25% increase. The Committee noted that domestic inflationary pressures are expected to remain strong and so given ongoing strong rhetoric around tackling inflation further Bank Rate rises should be expected.

On 23rd September the UK government, following a change of leadership, announced a raft of measures in a 'mini budget', loosening fiscal policy with a view to boosting the UK's trend growth rate to 2.5%. With little detail on how government borrowing would be returned to a sustainable

path, financial markets reacted negatively. Gilt yields rose dramatically by between 0.7% - 1% for all maturities with the rise most pronounced for shorter dated gilts. The swift rise in gilt yields left pension funds vulnerable, as it led to margin calls on their interest rate swaps and risked triggering large scale redemptions of assets across their portfolios to meet these demands. It became necessary for the Bank of England to intervene to preserve market stability through the purchase of long-dated gilts, albeit as a temporary measure, which has had the desired effect with 50-year gilt yields falling over 100bps in a single day.

Bank of England policymakers noted that any resulting inflationary impact of increased demand would be met with monetary tightening, raising the prospect of much higher Bank Rate and consequential negative impacts on the housing market.

After hitting 9.1% in June, annual US inflation eased in July and August to 8.5% and 8.3% respectively. The Federal Reserve continued its fight against inflation over the period with a 0.5% hike in May followed by three increases of 0.75% in June, July and September, taking policy rates to a range of 3% - 3.25%.

Eurozone CPI inflation reached 9.1% y/y in August, with energy prices the main contributor but also strong upward pressure from food prices. Inflation has increased steadily since April from 7.4%. In July the European Central Bank increased interest rates for the first time since 2011, pushing its deposit rate from -0.5% to 0% and its main refinancing rate from 0.0% to 0.5%. This was followed in

September by further hikes of 0.75% to both policy rates, taking the deposit rate to 0.75% and refinancing rate to 1.25%.

Financial markets

Uncertainty remained in control of financial market sentiment and bond yields remained volatile, continuing their general upward trend as concern over higher inflation and higher interest rates continued to dominate. Towards the end of September, volatility in financial markets was significantly exacerbated by the UK government's fiscal plans, leading to an acceleration in the rate of the rise in gilt yields and decline in the value of sterling.

Due to pressure on pension funds, the Bank of England announced a direct intervention in the gilt market to increase liquidity and reduce yields.

Over the period the 5-year UK benchmark gilt yield rose from 1.41% to 4.40%, the 10-year gilt yield rose from 1.61% to 4.15%, the 20-year yield from 1.82% to 4.13% and the 50-year yield from 1.56% to 3.25%. The Sterling Overnight Rate (SONIA) averaged 1.22% over the period.

Credit review:

In July Fitch revised the outlook on Standard Chartered from negative to stable as it expected profitability to improve thanks to the higher interest rate environment. Fitch also revised the outlook for Bank of Nova Scotia from negative to stable due to its robust business profile.

Also in July, Moody's revised the outlook on Bayerische Landesbank to positive and then in September S&P revised the GLA outlook to stable from negative as it expects the authority to remain resilient despite pressures from a weaker macroeconomic outlook coupled with higher

inflation and interest rates.

Having completed its full review of its credit advice on unsecured deposits at UK and non-UK banks, in May Arlingclose extended the maximum duration limit for five UK banks, four Canadian banks and four German banks to six months. The maximum duration for unsecured deposits with other UK and non-UK banks on Arlingclose's recommended list is 100 days. These recommendations were unchanged at the end of the period.

Arlingclose continued to monitor and assess credit default swap levels for signs of credit stress but made no changes to the counterparty list or recommended durations. Nevertheless, increased market volatility is expected to remain a feature, at least in the near term and, as ever, the institutions and durations on the Authority's counterparty list recommended by Arlingclose remains under constant review.

Appendix 2

Arlingclose's Economic Outlook for the remainder of 2022/23 (based on 26th September 2022 interest rate forecast)

	Current	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25
Official Bank Rate													
Upside risk	0.00	0.50	0.75	0.75	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	2.25	4.25	5.00	5.00	5.00	5.00	5.00	5.00	5.00	4.75	4.25	3.75	3.25
Downside risk	0.00	-1.00	-1.00	-0.75	-0.50	-0.50	-0.50	-0.75	-1.25	-1.50	-1.75	-1.75	-1.75

Arlingclose expects Bank Rate to rise further during 2022/23 to reach 5% by the end of the year.

The MPC is particularly concerned about the demand implications of fiscal loosening, the tight labour market, sterling weakness and the willingness of firms to raise prices and wages.

The MPC may therefore raise Bank Rate more quickly and to a higher level to dampen aggregate demand and reduce the risk of sustained higher inflation. Arlingclose now expects Bank Rate to peak at 5.0%, with 200bps of increases this calendar year.

This action by the MPC will slow the economy, necessitating cuts in Bank Rate later in 2024.

Gilt yields will face further upward pressure in the short term due to lower confidence in UK fiscal policy, higher inflation expectations and asset sales by the BoE. Given the recent sharp rises in gilt yields, the risks are now broadly balanced to either side. Over the longer term, gilt yields are forecast to fall slightly over the forecast period.

Background:

Monetary policymakers are behind the curve having only raising rates by 50bps in September. This was before the "Mini-Budget", poorly received by the markets, triggered a rout in gilts with a huge spike in yields and a further fall in sterling. In a shift from recent trends, the focus now is perceived to be on supporting sterling whilst also focusing on subduing high inflation.

There is now an increased possibility of a special Bank of England MPC meeting to raise rates to support the currency. Followed by a more forceful stance over concerns on the looser fiscal outlook. The MPC is therefore likely to raise Bank Rate higher than would otherwise have been

necessary given already declining demand. A prolonged economic downturn could ensue.

Uncertainty on the path of interest rates has increased dramatically due to the possible risk from unknowns which could include for instance another Conservative leadership contest, a general election, or further tax changes including implementing windfall taxes.

The government's blank cheque approach to energy price caps, combined with international energy markets priced in dollars, presents a fiscal mismatch that has contributed to significant decline in sterling and sharp rises in gilt yields which will feed through to consumers' loans and mortgages and business funding costs.

UK government policy has mitigated some of the expected rise in energy inflation for households and businesses flattening the peak for CPI, whilst extending the duration of elevated CPI. Continued currency weakness could add inflationary pressure. The short- to medium-term outlook for the UK economy is relatively bleak.

Global bond yields have jumped as investors focus on higher and stickier US policy rates. The rise in UK government bond yields has been sharper, due to both an apparent decline in investor confidence and a rise in interest rate expectations, following the UK government's shift to borrow to loosen fiscal policy. Gilt yields will remain higher unless the government's plans are perceived to be fiscally responsible.

The housing market impact of increases in the Base Rate could act as a "circuit breaker" which stops rates rising much beyond 5.0%, but this remains an uncertainty.

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

Report of: Executive Member for Community Safety

Meeting of: Council

Date: 8 December 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 confirm the continuation of the council's cumulative impact policy for a further 3 years
- 2.2. To adopt the Licensing Policy 2023-2027 for Islington, attached in Appendix A.
- 2.3. To agree that the Licensing Policy 2023-2027 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 revised 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 businesses.

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:

A handwritten signature in black ink, appearing to read 'J Gibbons', written over a light grey rectangular background.

Executive Member for Community Safety

Date: 28.11.22

Report Author: Janice Gibbons Head of Regulatory Services
Tel: 020 7527 3212
Email: Janice.gibbons@islington.gov.uk

Financial Implications Author: Steve Abbott, Head of Finance
Tel: 0207 527 7269
Email: steve.abbott@islington.gov.uk

Legal Implications Author: Marina Lipscomb, Chief Litigation Lawyer
Tel: 020 7527 3314
Email: marina.lipscomb@islington.gov.uk

Statement of Licensing Policy 2023-2027

Licensing Act 2003

Foreword

We are proud that in Islington we can boast a fantastic and diverse range of businesses offering cinema, theatre, sports, live music and great food and drink, and we want to preserve and promote this rich cultural offering, welcoming applications that seek to safely enhance our day and night-time economy.

We also recognise the huge pressures on businesses, especially after Covid, and we firmly believe that licensed premises which are compliant and well-regulated; which are managed responsibly and fully adherent to the licensing objectives; which are run safely and inclusively and working in partnership with the council and the community, make a positive contribution to our Borough.

As a Labour-run Council, we are determined to ensure that fairness, inclusivity, accessibility and safety permeate throughout our policies and our borough, and we approach all applications through the prism of these principles and objectives, duty bound to promote the licensing objectives as we work towards a safer and more equal Islington.

Licensing makes a fundamental contribution to the way our communities develop, live, work and relax. Used correctly, licensing policy can contribute to a vibrant night-time economy, encourage tourism, boost the local economy, and contribute to shaping places where people want to live. Islington's current licensing policy has sought to achieve this, and we will continue to ensure that our licensing policy achieves this too.

Building a more equal Islington is central to our vision for this wonderfully diverse borough and an inclusive local economy, where everyone has access to well-paid and secure jobs, and feels safe and welcome and respected, is a key pillar of our ambition. As such, the Licensing Policy dovetails Islington's 2021 Strategic Plan for a more equal future for everyone and factors in the Plan's priorities to support "local jobs and businesses in a thriving local economy"; to foster "communities that feel safe, connected and inclusive", and to create "a cleaner, greener and healthier borough".

We have high expectations of our license applicants. Alcohol consumption is a major factor behind violent crime and disorder with serious consequences to victims, businesses and local communities. We are also painfully aware of the links between poor health and excessive alcohol consumption, and the occasional conflict between the needs of our business community and those of our residents who have a right to live peacefully within their homes and community.

So, we welcome applications that are aware of the Safer Islington Partnership's vision to make our borough a safer place, working with our communities and partners to reduce the risk of harm, increase community confidence and improve the quality of life for all.

We especially welcome applicants who actively promote women's safety and LGBTQ+ inclusivity, through adopting schemes such as Ask Angela, Ask for Clive or becoming a Safe Haven, and which work to eradicate hate crime and discrimination in all its ugly forms.

We are a London Living Wage employer and expect applicants to pay their staff the living wage, ensure they are well supported and trained, and assisted in safe travel especially at night. We are a Council determined to achieve net-zero carbon by 2030 and expect applicants to rigorously promote environmental protection. And we are a Council committed to the safety of all our residents, so expect applicants to demonstrate an active commitment to high standards of management and care as outlined in our Licensees' Charter.

At the same time, we recognise our shared legal duties to uphold the licensing objectives and to adhere to key legislation, including the prevention of immigration crime as set out in the Immigration Act (2016) and the Modern Slavery Act (2015), and we are committed to working in partnership to ensure a responsive licensing approach which strikes the right balance, supports the diversity of our borough and ensures that businesses can thrive while residents and visitors can enjoy what's on offer in a safe, inclusive and welcoming environment.

Cllr John Woolf

Executive Member for Community Safety

Cllr Angelo Weekes

Chair of Licensing Committee

Contents		Page Number:
Introduction		6
Licensing Policy in Context		7
Safer Islington Partnership		8
Public Space Protection Order		8
Operation Nightsafe		8
Development Planning	(LP 1)	9
Location, cumulative impact and saturation	(LP 2)	10
Cumulative Impact Policy Areas	(LP 3)	11
Clerkenwell		12
Bunhill		14
Kings Cross		15
Angel and Upper Street		17
Holloway and Finsbury Park		18
Archway		20
Off sales of alcohol from shops and other premises	(LP 4)	21
Licensing hours	(LP 5 & 6)	23
The Operating Schedule	(LP 7)	26
Management Standards	(LP 8)	27
Equality and Inclusion in Licensed Premises	(LP 9)	27
Diversity in the Evening and Night-time economy	(LP 10)	28
Cultural venues	(LP 11)	28
Working together and supporting best practice	(LP 12)	29
Temporary Event Notices	(LP 13)	30

Risk Assessment	(LP 14)	31
Alcohol induced crime, disorder and antisocial behaviour	(LP 15)	32
Selling alcohol on event and match days	(LP 16)	33
Use of toughened glass and polycarbonates	(LP 17)	33
Illicit goods	(LP 18)	34
Drug Policies	(LP 19)	35
Safer travel at night	(LP 20)	35
Safe and secure licensed venues	(LP 21)	36
Public nuisance	(LP 22)	37
Noise associated with licensable activities	(LP 23)	39
Noise from deliveries to premises	(LP 24)	40
Noise relating to deliveries from the premises	(LP 25)	41
Smoking, drinking and eating outside	(LP 26)	41
Dispersal policies	(LP 27)	42
Environmental best practice in licensed premises	(LP 28)	43
Adult entertainment	(LP 29)	44
Children and licensed premises	(LP 30)	44
Children and alcohol	(LP 31)	45
Enforcement		45
Review of premises licences	(LP 32)	46
Appendix 1 Alcohol and Health in Islington		48

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 licensed premises are likely to be permitted to operate 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, evening and night time economy.

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 reviews of the Licensing Policy in 2017 and 2022 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 nine 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 Islington Together vision to create a more equal Islington, where everyone who lives here has an equal chance to thrive.

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 licensed 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 inclusive licensed 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 licensed 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 licenced 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, Licensed Trade, the Police and our expert and highly trained delivery partner. It is funded by the Late Night Levy, which is paid by all licensed 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 aid licensed premises and members of the public in need
- additional activities and police resources to provide a safer night time economy

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 licensed premises concentrated in one area. As a borough with one of the highest concentrations of licensed 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

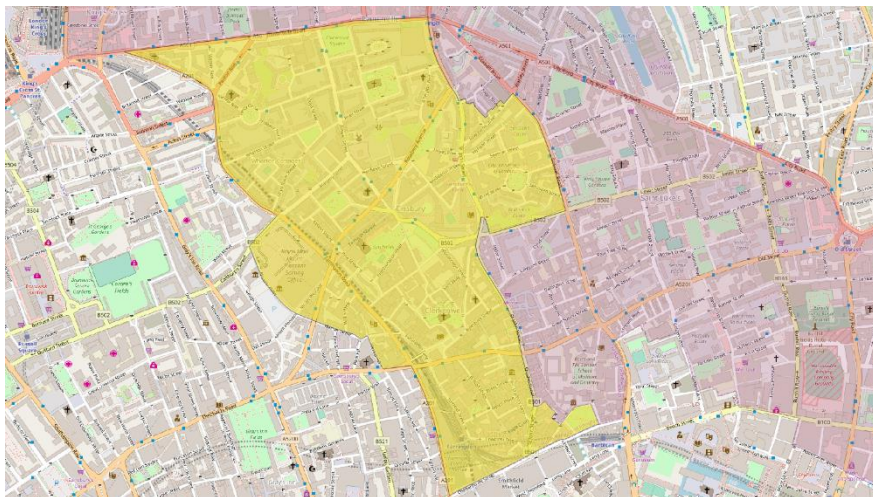
15. After receiving representations in relation to a new or variation application, the licensing authority will consider whether it would be justified in departing from this special policy in the light of the individual circumstances of the case. The impact of an application can be expected to be different 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 licensed 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 licensed premises are well managed and any negative impacts on

local residents in terms of crime, disorder, nuisance and antisocial behaviour are minimised.

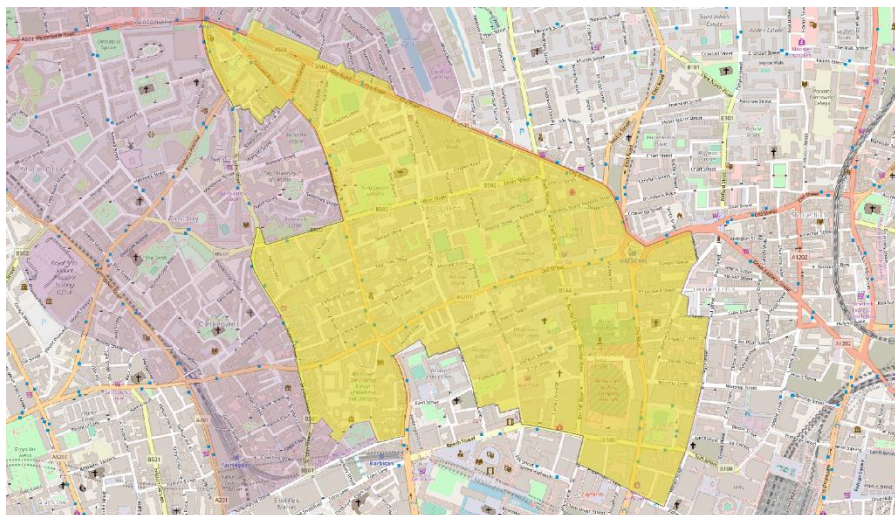
21. Businesses in Clerkenwell make a significant contribution to the economic prosperity of the borough through the provision of employment opportunities, the well-established creative industries hub and the distinct cultural, leisure and historical offer in the area which attracts local, national and 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:



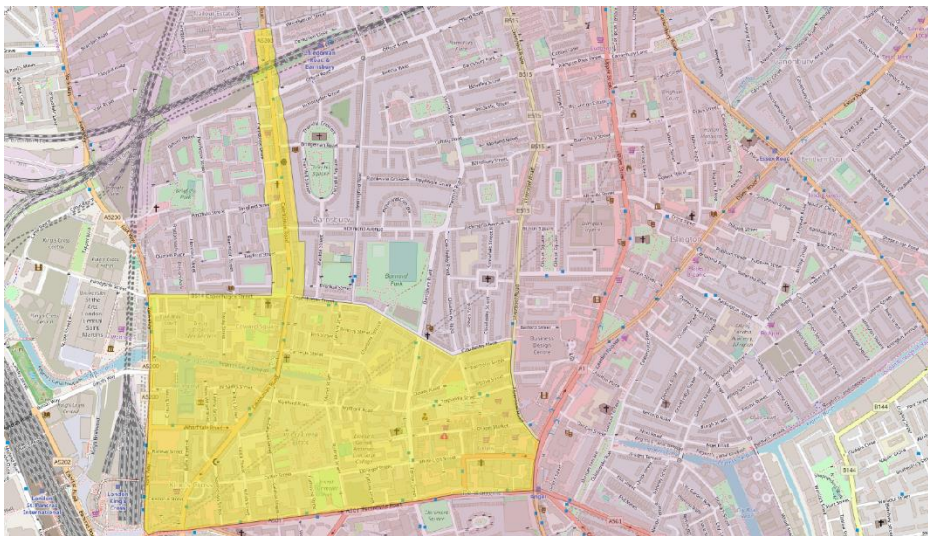
27. Tech City, a technology start up cluster at Old Street roundabout, and new major residential developments in the area and in neighbouring Hackney, has attracted more licensed venues to Bunhill to meet demand. This trend is likely to continue as more residential developments are built and the predicted 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:
- a. 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
 - b. Premises with hours of operation consistent with framework hours
 - c. Premises that can demonstrate high standards of management with respect to preventing public nuisance associated with waste management & littering
 - d. 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.

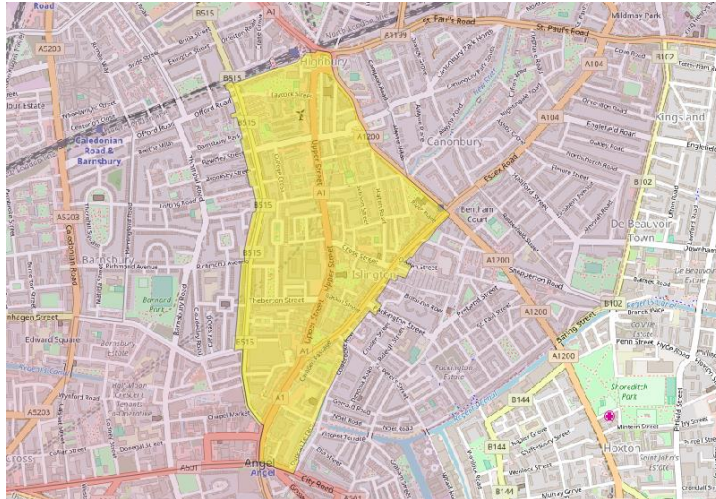
36. The Licensing Authority is committed to working with potential applicants and existing licence holders to maintain a well-managed evening economy that meets residents and business needs whilst minimising any adverse impacts in terms of crime, disorder, nuisance and antisocial behaviour.
37. The Licensing 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 licensed premises are well managed and any negative impacts on local residents in terms of crime, disorder, nuisance and antisocial behaviour are minimised.
43. Licensed 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 licensed 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

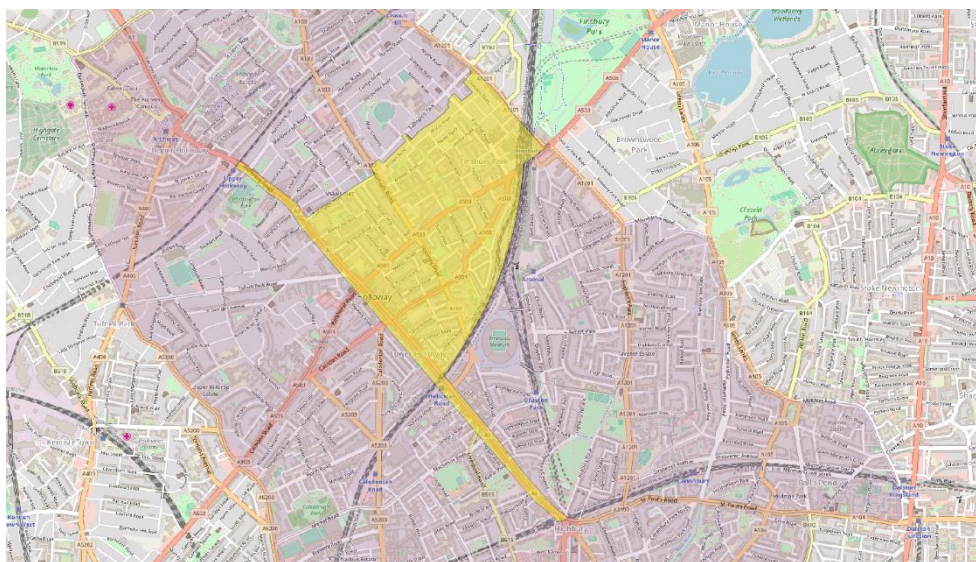
47. Within the scope of the Angel and Upper Street Cumulative Impact area, the Licensing Authority is able to give more detailed guidance on the sort of applications that could be considered to be an exception to the cumulative impact policy.

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 licensed 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 licensed businesses operating in the area have made a disproportionate demand on the Licensing Authority's enforcement resources.

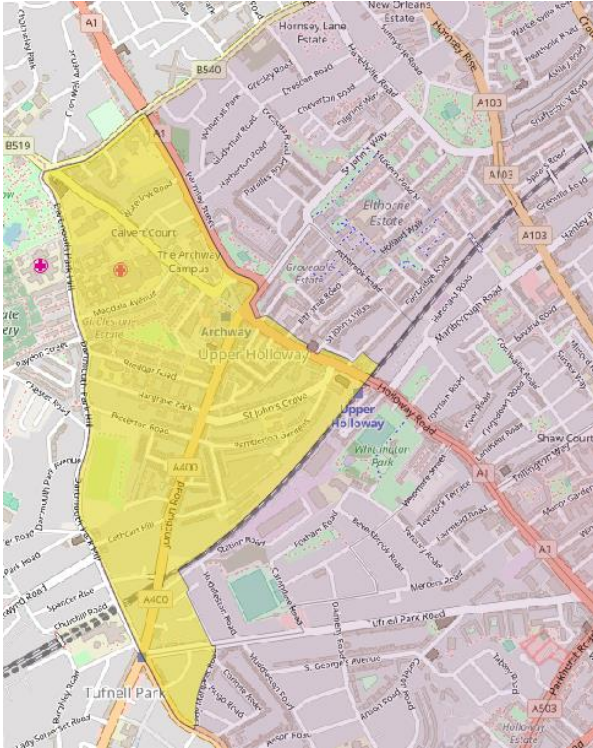
53. Licensing Authority is committed by working with potential applicants and existing licence holders to maintain a well-managed evening economy that meets residents and business needs whilst minimising any adverse impacts in terms of crime, disorder, nuisance and antisocial behaviour.
54. The Licensing 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, or preventing, the sale of high strength beer, lager and cider, 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 on food
- 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 licensed 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 licensed 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
	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 licensed 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.
88. The Licensing Authority will expect the operating schedule for a Shadow Licence to contain bespoke arrangements to promote the licensing objectives when the shadow licence is bought into effect including:
 - a. Written notification to the Licensing Authority
 - b. The arrangements for appointing an experienced and competent management team
 - c. The process to be followed in the event of the existing licensed being suspended or revoked
 - d. Communication arrangements with the existing premises licence holder
89. A shadow licence is the term used to describe a second or subsequent licence for premises where a licence already exists and the shadow licence may replicate the licensable activities, hours and conditions of an existing licence or it may differ in some or all respects.

90. The holder of the shadow licence could be the freeholder of the premises, the existing premises licence holder or any other person but the existence of two licences for the same premises may lead to confusion as to which licence is being used at the premises at any given time. If an existing licence is revoked, suspended or lapses the holder of the shadow licence can bring the shadow licence into immediate effect and continue providing licensable activities at the premises.

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 demonstrate commitment to ongoing staff training**
- **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.

91. The Licensing Authority is committed to promoting high standards of management in all licensed 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.

92. 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.

93. When designing new premises the provision of toilet facilities should reflect the diverse range of needs of customers and staff so that everyone has access to facilities that they feel comfortable with including a mixture of sex specific and gender neutral toilets. Where gender neutral toilets are provided they should have floor to ceiling partitions with the provision of hand washing and sanitary hygiene facilities. There should also be consideration of the ratio of female toilets to minimise queuing.

94. 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.

95. 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.

96. 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.

97. 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.
98. 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.
99. 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.
100. 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

101. 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.
102. 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

103. 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

104. 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 licensed 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

105. 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 premise 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**

106. 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.
107. 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.
108. 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.**

109. 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>

110. 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**
- **-serving 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.

111. 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.

112. 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.**

113. 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 more than 10,000. Licensees can check with Police and Licensing Officers on what is classified as high risk matches and events.

114. The Licensing Authority has specific concerns about the consumption of alcohol in public places on these occasions and the potential that this has on 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**

115. Evidence indicates that most 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 several high profile cases where people have suffered serious injuries resulting from glass attacks.

116. 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.

117. 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.

118. The Licensing Authority will consider 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.

119. 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.

120. 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 licensed 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.

121. 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 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.**

122. 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 licensed 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 residents

123. 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.

124. 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.

125. 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.

126. 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.

127. 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, late night, weekends and bank holidays, and with a focus on delivery vehicle noise including idling engines and noise from delivery riders/drivers.
- **deliveries to the premises:** particularly early morning, late night, weekends, and bank holidays, and with a focus on delivery vehicle noise including idling engines and noise from delivery riders/drivers.
- **flyposting:** unauthorised posting of posters / advertisements etc.
- **highways and pavement obstructions:** minimise 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 licences 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.

128. 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.
129. 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'.
130. 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.
131. 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.
132. 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.

133. 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.
134. 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

Noise from delivery vehicles is a large source of complaints and could potentially result in a public nuisance. Licence holders and applicants are encouraged to consider whether early morning deliveries to and from their premises could potentially result in a public nuisance and to introduce measures, such as quiet delivery processes, 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. Collection and disposal of bottles and other waste glass should be avoided during the above hours. Where deliveries can only be made at night, applicants are expected to identify appropriate arrangements for quiet deliveries.

135. 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.
136. 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.
137. 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 expected to consider quiet collection and delivery to of licensable goods when 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 usually expects the appointment of contractors who can carry out collections and deliveries using non-internal combustion engine vehicles.

138. 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

139. 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. Outdoor tables and chairs have become an integral part of many licensed premises operations and, where appropriate, can contribute to a vibrant public realm but will be determined on a case-by-case basis. 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.

140. 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.
141. 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.
142. 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.
143. 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.
144. 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.

145. 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.

146. 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.

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

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

- 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
- Reducing all types of waste and maximising recycling
- Reducing use of internal combustion engines 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.

149. 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.

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

151. 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 licensed 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.

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

153. The Licensing Authority supports the provision of licensed 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 in place.
154. 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.
155. 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.

156. 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

157. 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 licensed trade, other

responsible authorities and council services to promote the licensing objectives.

158. 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.
159. Police Licensing Officers lead on significant crime and disorder issues associated with licensed premises and activities that involve other specialist officers within the Metropolitan Police.
160. 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.
161. 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.
162. 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**

163. 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.
164. 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.

165. 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.
166. The Council is concerned that the existence of a shadow licence may undermine available sanctions in response to an application to review a premises licence when a shadow licence exists for the same premises.
167. In circumstances where we receive an application to review a licence at premises where a shadow licence exists, the Licensing Authority or other Responsible Authority or Interested Party, may consider whether it is appropriate, for the promotion of the licensing objectives, to make an application to review the shadow licence at the same time.

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/61422/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 licensing 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-licence outlets were associated with higher hospital admission rates for acute and chronic conditions wholly attributable to alcohol consumption¹⁴. The study also found that regarding off-licence

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/](#)

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 sales of 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 a night out to negative health and criminal justice outcomes. *Addiction*. 2008 Jan;103(1):60-5.

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

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

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 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 can 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 licences 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 licensing 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 100,005. 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 Licensing 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.

This page is intentionally left blank

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.

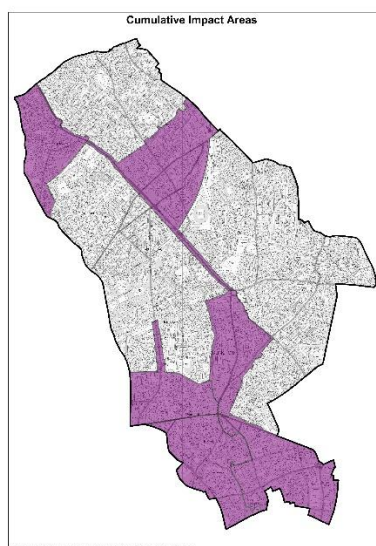
The exception to Islington's cumulative impact policy are applications that meet the following criteria:

- 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:

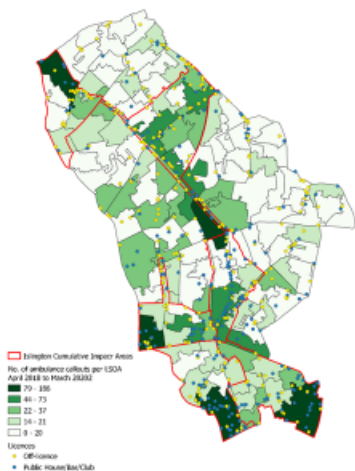
- 86% complaints and referral requiring licensing Team intervention related to premises located in cumulative impact policy areas

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

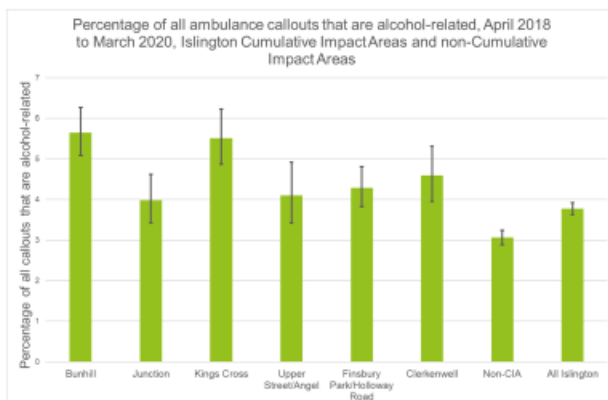


- There was a total of 2438 alcohol-related ambulance callouts in Islington between April 2018 and March 2020, an average of 10 per Lower Layer Super Outlet Area (LSOA) per year
- Areas with large concentrations of licensed premises tend to have greater numbers of alcohol-related ambulance callouts, 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, 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.

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 several 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>

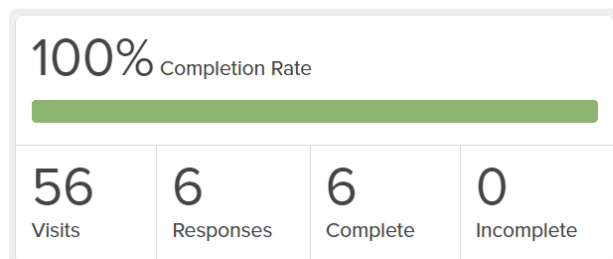
<p>Noise complaints are received as a result of these legitimate activities and these can become repeated and vexatious. A fair process, guided by policy, should be developed to deal with such cases.</p>	
<p>3. We would suggest a sense-check is undertaken to investigate whether Low Traffic Neighbourhoods 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>Would we reinstate the Licensees Charter?</p> <p>Could we include advice on preventing drink spiking?</p>	<p>Licensing Policy 21 and paragraph 118 amended as suggested.</p> <p>Licensees Charter now included in policy in paragraph 104</p> <p>New drink spiking mitigations in paragraph 127</p>
4. Councillor	

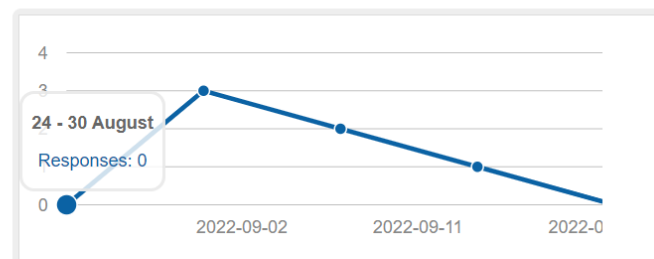
<p>Requiring late night venues to adopt safer transport home policies for staff working late at night</p>	<p>Licensing Policy 20 on Safer Travel at Night extended to include staff working in late night venues and new paragraph 124</p>
5.Licensing Committee	
<p>Changes suggested by Licensing Committee:</p> <ol style="list-style-type: none"> 1. Minor amendments to the wording paragraph of paragraph 73 2. Include policy approach to shadow licence applications 3. Include more detail on toilet provision to reflect diverse range of customers' needs 4. Minor changes to the wording on Policy 22, 24 and 25 to improve clarity of policy expectations and promote quiet deliveries 5. Amending Licensing Policy 26 on smoking, drinking and eating outside to balance the needs of residents and business 6. Strengthening Licensing Policy 28 on Environmental Protection and NZC 7. Reinstate the Licensees Charter 8. Include reference to drinking spiking mitigations 	<ol style="list-style-type: none"> 1.Paragraph 73 amended accordingly 2. New paragraphs 88, 89, 90 ,165 and 166 on shadow licences 3. New paragraph 93 covering sex specific and gender neutral toilet provision 4. Licensing Policies 22,24 & 25 amended accordingly. 5. Licensing Policy 26 amended. 6. Qualified wording deleted. 7. New paragraph 104 includes reference to the Licensees Charter 8. New paragraph 127 on drink spiking

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%; height: 10px; background-color: #4CAF50;"></div>	6
No	16.7%	<div style="width: 16.7%; height: 10px; background-color: #4CAF50;"></div>	1
Any comments?	0.0%	<div style="width: 0%; height: 10px; background-color: #4CAF50;"></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%; height: 10px; background-color: #4CAF50;"></div>	6
No	0.0%	<div style="width: 0%; height: 10px; background-color: #4CAF50;"></div>	0
Any comments?	0.0%	<div style="width: 0%; height: 10px; background-color: #4CAF50;"></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.

The Licensing Policy review, lead by the Licensing Committee and Executive Member for Community Safety, and subsequent public consultation has resulted in the following key 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 20 – Safer Travel at Night

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 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.

124. 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.

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 125 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, late night, weekends and bank holidays, and with a focus on delivery vehicle noise including idling

engines and noise from delivery riders/drivers.

- deliveries to the premises: particularly early morning, late night, weekends, and bank holidays, and with a focus on delivery vehicle noise including idling engines and noise from delivery riders/drivers.
- flyposting: unauthorised posting of posters / advertisements etc.
- highways and pavement obstructions: minimise 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 24 – Noise from Deliveries to the Premises

Noise from delivery vehicles is a large source of complaints and could potentially result in a public nuisance. Licence holders and applicants are encouraged to consider whether early morning deliveries to and from their premises could potentially result in a public nuisance and to introduce measures, such as quiet delivery processes, 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. Collection and disposal of bottles and other waste glass should be avoided during the above hours. Where deliveries can only be made at night, applicants are expected to identify appropriate arrangements for quiet deliveries.

Licensing Policy 25 Noise Relating to Deliveries From The Premises

Licence holders and applicants are expected to consider quiet collection and delivery for licensable goods when 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 usually expects 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 AND PARAGRAPHS

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.

When designing new premises the provision of toilet facilities should reflect the diverse range of needs of customers and staff so that everyone has access to facilities that they feel comfortable with including a mixture of sex specific and gender neutral toilets. Where gender neutral toilets are provided they should have floor to ceiling partitions with the provision of hand washing and sanitary hygiene facilities. There should also be consideration of the ratio of female toilets to minimise queuing.

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:

- 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
- Focusing on reducing all types of waste and maximising recycling
- 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 127 (drink spiking)

127. 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 104 (Licensees' Charter)

104. 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

New Paragraphs 88-90 & 165-166 (Shadow Licences)

88. The Licensing Authority will expect the operating schedule for a Shadow Licence to contain bespoke arrangements to promote the licensing objectives when the shadow licence is bought into effect including:

- a. Written notification to the Licensing Authority
- b. The arrangements for appointing an experienced and competent management team
- c. The process to be followed in the event of the existing licensed being suspended or revoked
- d. Communication arrangements with the existing premises licence holder

89. A shadow licence is the term used to describe a second or subsequent licence for premises where a licence already exists and the shadow licence may replicate the licensable activities, hours and conditions of an existing licence or it may differ in some or all respects.

90. The holder of the shadow licence could be the freeholder of the premises, the existing premises licence holder or any other person but the existence of two licences for the same premises may lead to confusion as to which licence is being used at the premises at any given time. If an existing licence is revoked, suspended or lapses the holder of the shadow licence can bring the shadow licence into immediate effect and continue providing licensable activities at the premises.

165. 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.

166. The Council is concerned that the existence of a shadow licence may undermine available sanctions in response to an application to review a premises licence when a shadow licence exists for the same premises.

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

Report of: Executive Member for Community Safety

Meeting of: Council

Date: 8 December 2022

Ward(s): All

Subject: Gambling Premises Licensing Policy 2023-2027

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.

2. Recommendations

- 2.1. To note the results of the consultation feedback as detailed in Appendix B
- 2.2. To note 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
- 2.3. Adopt the Gambling Premises Licensing Policy 2023-2025 for Islington, attached in Appendix A.
- 2.4. Agree that the Policy shall apply to all applications for a premises licence or club certificate submitted after 1 January 2023
- 2.5. To renew the resolution of the Council not to issue any casino licences in the period 2023-2025

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

- 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)

No Casino Policy

- 3.10. 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.
- 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:

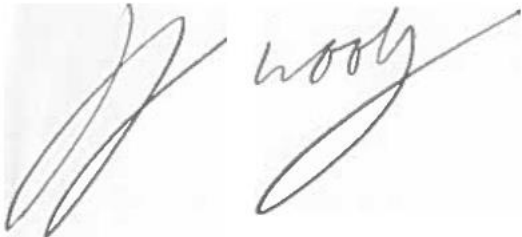
- A Proposed Gambling Premises Licensing Policy 2023-2025
- B Consultation Feedback LBI Response

Background papers:

- None

Final report clearance:

Signed by:

A handwritten signature in black ink, appearing to read 'J. Gibbons', is written over a light grey rectangular background.

Executive Member for Community Safety

Date: 28.11.22

Report Author: Janice Gibbons Head of Regulatory Services
Tel: 020 7527 3212
Email: Janice.gibbons@islington.gov.uk

Financial Implications Author: Steve Abbott Head of Finance
Tel: 02027 527 2369
Email: steve.abbott@islington.gov.uk

Legal Implications Author: Marina Lipscomb, Chief Litigation Lawyer
Tel: 0207527 3314
Email: marina.lipscomb@islington.gov.uk

This page is intentionally left blank

Gambling Premises Licensing Policy 2023-2026

Statement of Principles

Gambling Act 2005

Foreword

Gambling is a public health issue: anyone can be vulnerable to addictive gambling.

Inherent in this health-harming addictive activity are potentially devastating consequences.

For individuals. For friends. For families. For communities.

As a small borough with high levels of deprivation and inequality, and as a council absolutely committed to making our borough safer and more equal for everyone, we approach the licensing of gambling robustly.

Harms related to gambling are manifold. They encompass financial problems, work disruption, mental health distress and relationship breakdowns. They can lead to theft, fraud, street robbery, anti-social behaviour, child neglect and domestic abuse.

And these harms reflect and amplify inequalities.

As our local area profiles indicate, the areas where we have multiple factors coalescing to place residents at risk of harm are also areas that tend to have the most gambling premises.

There is a clear correlation between deprivation and higher numbers of gambling premises. Incidents at these venues contribute to our overall levels of crime. We remain resolute in upholding the licensing objectives; resolute in being data informed; resolute in safeguarding our communities.

Each application will be considered on its merits, fully cognisant of our legal obligations, with best practice demanded as an absolute matter of course. Where a new application could result in saturation, clustering, or increased risk for vulnerable people, we will consider refusal.

Local authorities have a statutory duty to enforce the licensing objectives of the 2005 Gambling Act, which are to ensure gambling is fair and open, not associated with crime and that it does not harm the young and vulnerable.

However, while this local authority will exercise all powers at its disposal in seeking to uphold these licensing objectives, councils have no control over remote gambling.

Most gambling losses are through remote gambling rather than within gambling venues. This diminishes the already limited power of local authorities to act against gambling harm by upholding the 2005 Gambling Act licensing objectives.

This council will look to redress that balance by ensuring our voice is heard in the ongoing Gambling Act Review. In the event this does not deliver more powers to local authorities, we will work with other local authorities on a Sustainable Communities Act proposal with the aim of ensuring remote gambling is controlled and the social and economic consequences of gambling harm are mitigated.

Cllr John Woolf

Executive Member for Community Safety

Cllr Angelo Weekes

Chair of Licensing Committee

Contents

Part 1 - Introduction

Islington in context
Islington Together
Purpose and Scope
Licensing Objectives
Licensing Authority Functions
Role of the Gambling Commission
General Approach to Applications

Part 2 – Specific Requirements

Gambling Premises Licence Applications
Management Standards
Crime and Disorder
Protecting Children From Harm
Alcohol licensed premises gaming machine permits
Prize gaming permits
Development Planning
Split Premises
Opening Hours
Enforcement Policy
Illegal Gaming Machines
Casino Resolution
Competent Body for Protecting Children

Part 3 – Protecting Vulnerable People From Gambling Related Harm

References

Appendices

Appendix 1. Local Area Profile
Appendix 2. Model Premises Licence Conditions
Appendix 3. Responsible authority contact details

PART 1 - Introduction

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 acknowledges that licensing authorities 'shall aim to permit the use of premises for gambling', as specified in section 153 of the Gambling Act, whilst recognising that the presumption is counterbalanced 'in so far as the authority think' the application accords with relevant codes, guidance, objectives and policy. As such, when making decisions about gambling matters the authority will consider the authority's statement of licensing principles and:

- the licensing objectives
- any relevant code of practice or guidance issued by the Gambling Commission
- 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
- uncategorised.

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 licenced 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, societal and economic impacts
- 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

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>

Further Information

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.

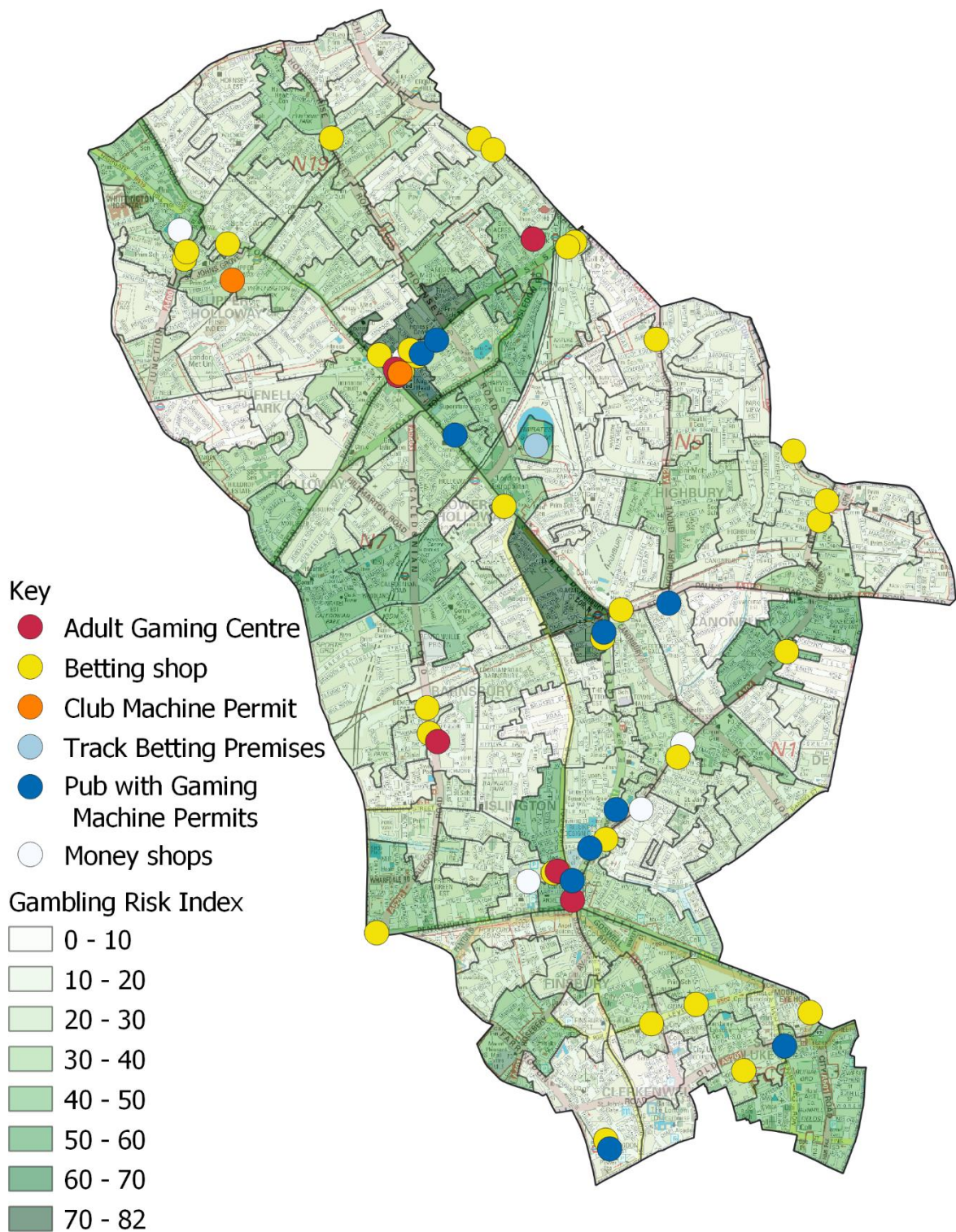
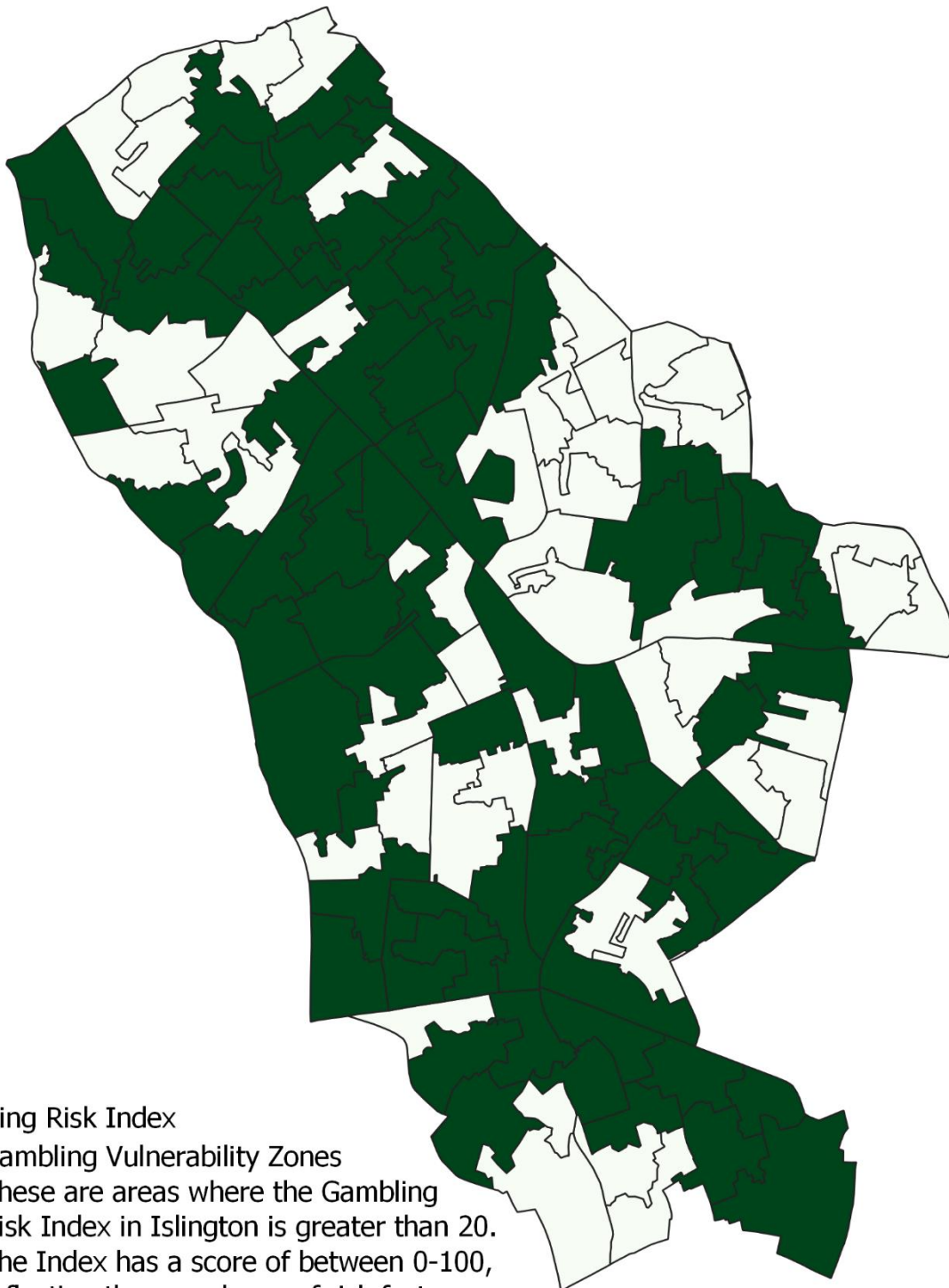


Diagram 1 – Gambling Risk Index with an overlay showing the location of gambling premises and money shops



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

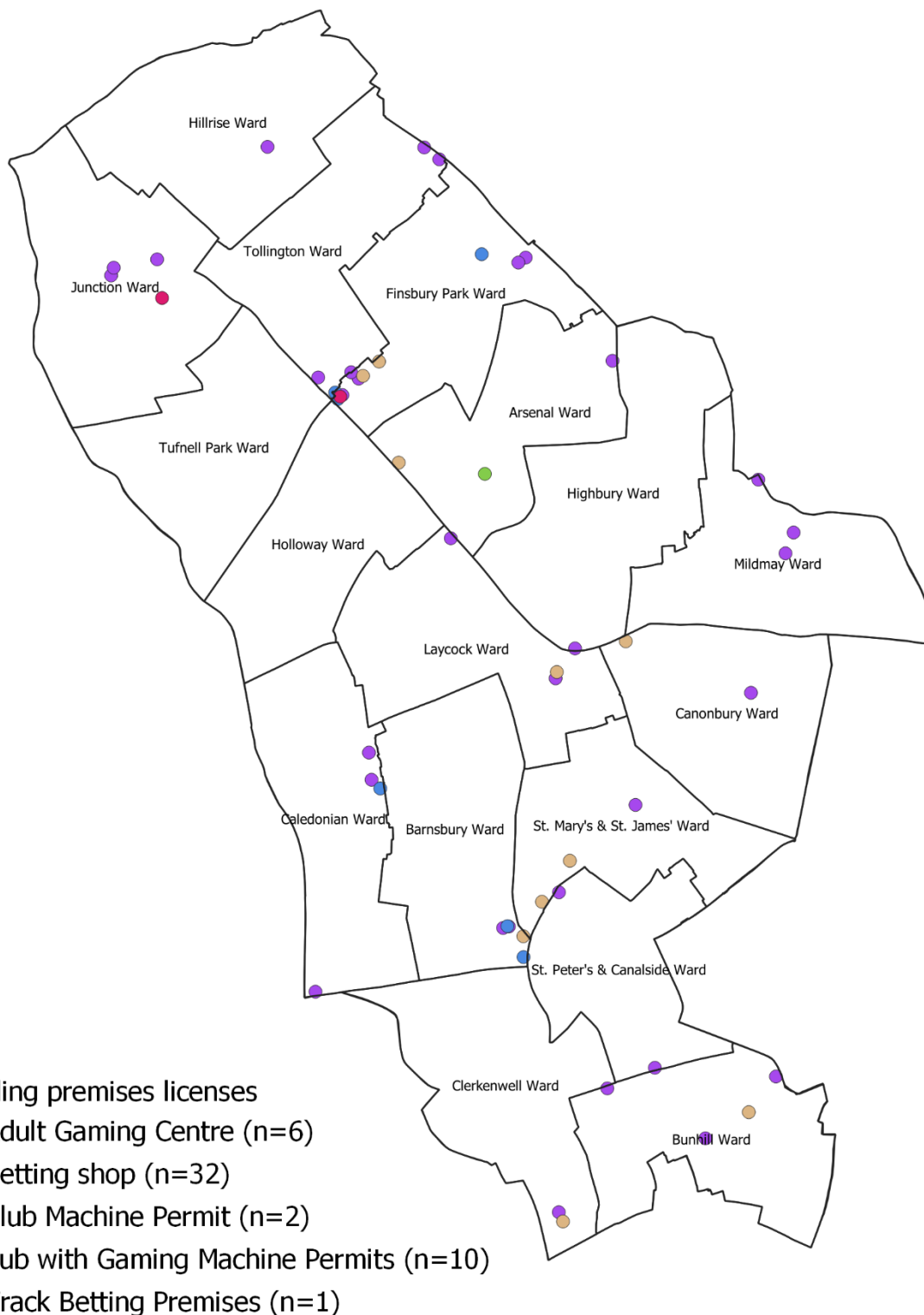


Diagram 3 Diagram showing cluster location of gambling premises by ward

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**.

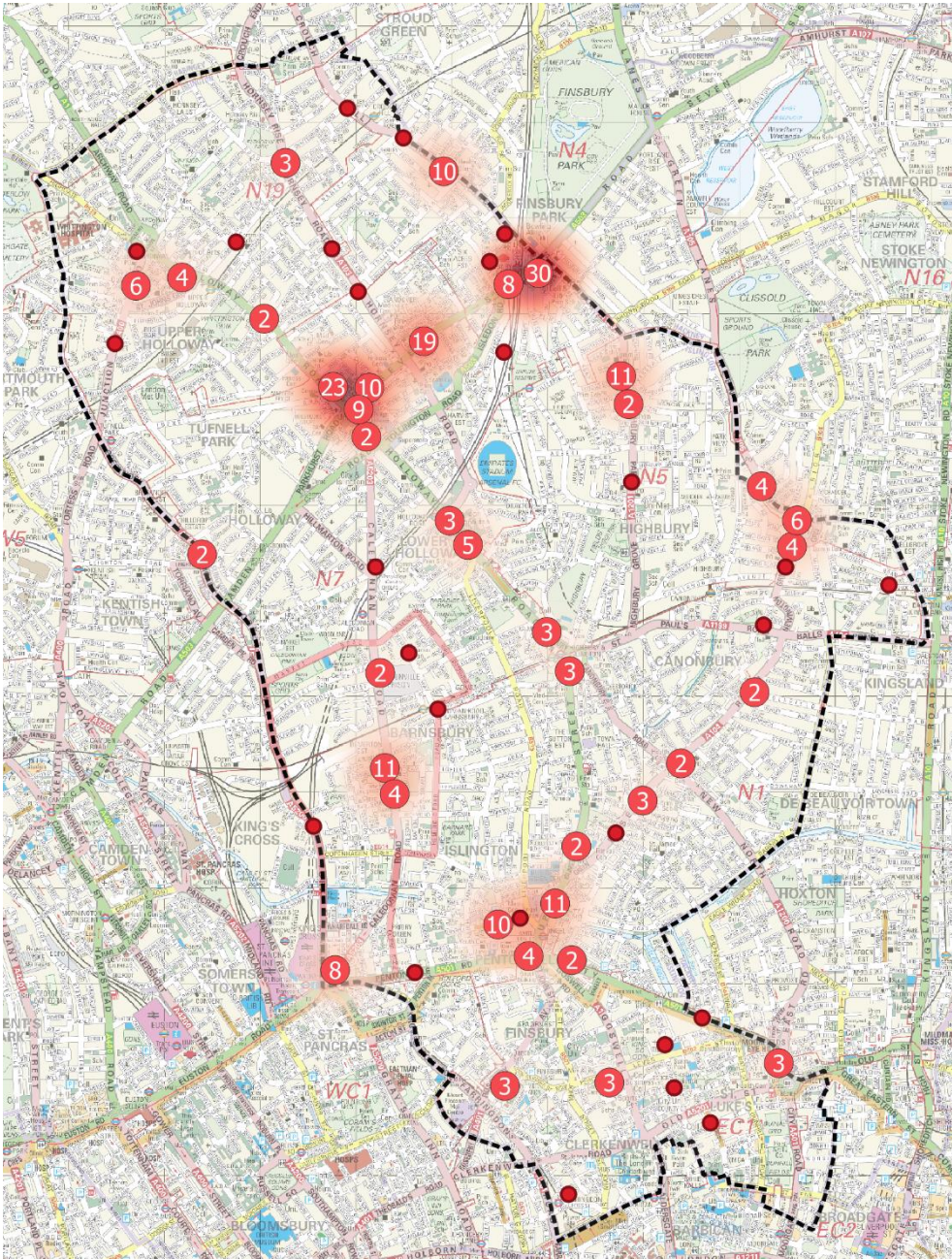


Diagram 2 – Showing the location of Betting Shops and the location of offences.

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.

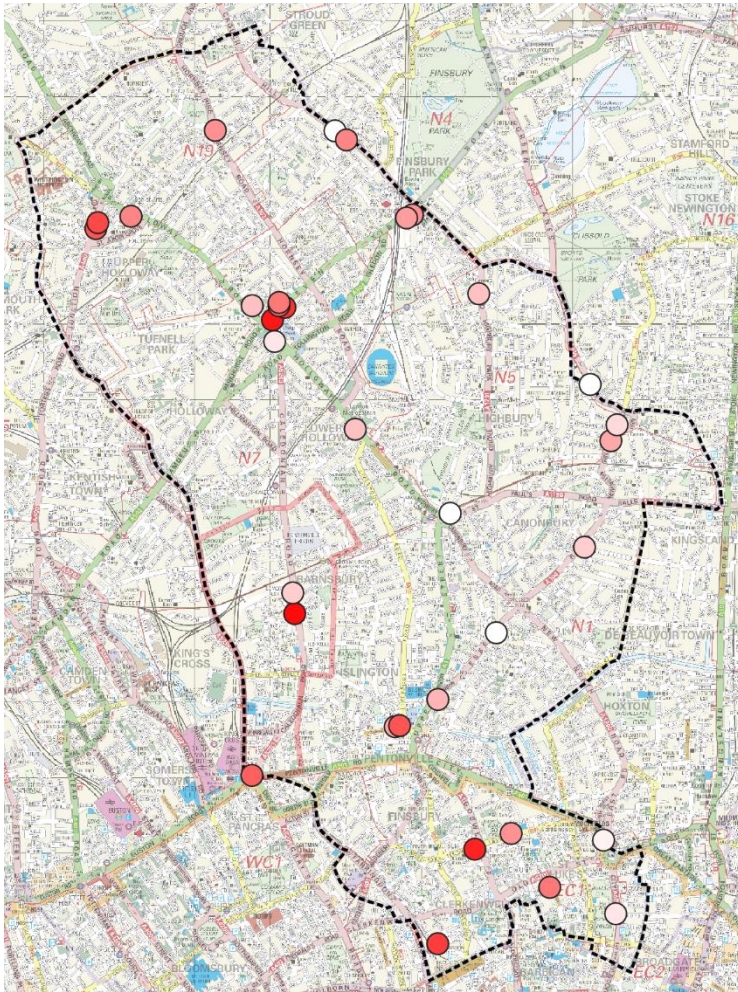


Diagram 3 Street based antisocial behaviour near betting shops.

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

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
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.	This section has been extended and reworded to reflect the statutory requirements for betting shop and adult gaming centres open hours
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.	The Gambling Act does not permit councils to impose an outright ban on extending opening hours. The council has two relevant legal responsibilities: <ol style="list-style-type: none"> 1. Aim to permit gambling activities 2. Treat each application on on

	its own merits
<p>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>	<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 extended 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	
<p>The section covering the council's responsibility to 'aim to permit the use of premises for gambling' should be qualified and include reference 'in so far as the authority thinks fit'.</p> <p>I propose the following change of wording to:</p> <p><i>The council acknowledges that licensing authorities 'shall aim to permit the use of premises for gambling', as specified in section 153 of the Gambling Act, whilst recognising that the presumption is counterbalanced 'in so far as the authority think' the application accords with relevant codes, guidance, objectives and policy. As such, when making decisions about gambling matters the authority will consider the authority's statement of licensing principles and:</i></p>	The policy has been amended accordingly
We should utilise local Area profiles and the gambling risk index to bolster an evidence-based model. It remains hugely frustrating that the Act limits, in my opinion, our ability to uphold the licensing objectives set out in the Gambling Act.	Noted

<p>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>	
<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</p>

	pool of model conditions that may be appropriate to attach to a licence on a 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.
Online gambling—this needs to be incorporated into the report, thereby strengthening the claim of saturation; it would significantly bolster our local evidence base: 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. The relevant paragraph is here: (from this report: https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final.pdf).	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

<p>▪ 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 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>arising from licenced gambling premises.</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 	<p>This section has now been deleted</p>

<p>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>	
<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'? 	<p>This section has now been deleted</p>
<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>	<p>The section has been amended to reflect this feedback</p>
<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>	<p>These sections have been reworded to reflect feedback</p>
<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>	<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.	This is now included
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 day loan shops and pawnbrokers in close proximity to gambling premises can facilitate problem gambling and spiralling debt.	The list of sensitive premises has now been extended to include these types of premises
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?	These sections have been reworded to reflect feedback
<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>	
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.	Noted
<p>Foreword</p> <p>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</p>	<p>The draft policy has been revised to reflect this comment, In particular we have:</p> <p>Realigned or deleted specific paragraphs to</p>

<p>appropriate document to contain additional commentary, which is beyond the scope of the policy's function.</p>	<p>ensure that the policy reflects the requirements 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.</p>	<p>This section has been reworded</p>

<p>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.</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</p>	<p>The Council has considered gambling related harm and collated evidence to support the policy.</p> <p>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 to protect from</p>

<p>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.</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>	gambling related harm
<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</p>	This appendix has been deleted from the Policy and replaced with model conditions that may be

<p>of the LCCP. We believe this 'gambling best practice' is a duplication of these requirements.</p>	<p>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>	<p>Paragraph deleted and ATM condition included in the model conditions in appendix 2</p>
<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>	<p>Noted</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>	<p>Noted</p>
<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</p>	<p>The responses to the issues</p>

<p>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 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.</p> <p>Foreword</p> <p>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>Draft Policy Comments</p> <p>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.</p> <p>Betting Premises</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</p>	<p>raised are addressed above</p>
--	-----------------------------------

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**

<p>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> <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 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>The definition of vulnerable people in of protection from 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,</p>	<p>The ‘no casino’ policy was subject to wide consultation in 2004/5 when the licensing function for gambling</p>

<p>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>premises moved from the magistrates court to local authorities.</p> <p>The decision to continue the policy for a further three years is include in the Gambling Premises Licensing Policy consultation</p>
<p>Specific comments Part 2 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>	<p>The definition of vulnerable people in of protection from gambling harms has been extended as suggested</p>
<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>	<p>Noted and agreed in principle but whole -council approach to gambling is outside the scope of the Gambling Premises Licensing Policy</p>
<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</p>	<p>A new section on opening hours, which reflects the</p>

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

these trading hours apply to all gambling premises within the borough.	requirements of the Act, is included in the revised draft policy
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.	This paragraph has been deleted from the revised draft policy
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.	The definition of vulnerable people in of protection from gambling harms has been extended
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.	The section has been reworded to include exceptional reasons
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.	The definition of vulnerable people in of protection from gambling harms has been extended
42 Additional premises to be taken into account during license applications should be:	These premises have

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

<ul style="list-style-type: none"> • Banks and ATMs • Pawn shops • Cash converters • Fast-food outlets 	<p>been included in the list to be considered in an applicant's risk assessment</p>
<p>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.</p>	<p>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</p>
<p>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.</p>	<p>The section has been reworded and a new model condition included in appendix 2.</p>
<p>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.</p>	<p>Noted</p>
<p>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</p>	<p>The council recognises that there are limitations, especially in</p>

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>

<p>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.</p>	<p>relation control measures relating to gambling machines in pubs as the majority of premises are only required to notify the council that they are providing gambling machine.</p>
<p>Part 4 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>	<p>This suggestion requires an amendment to the Gambling Act and is therefore outside the scope of the Gambling Premises Licensing Policy</p>
<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>	<p>The council can only impose conditions requiring staff training on safer gambling and suicide prevention on gambling premises licences</p>
<p>Appendix 1 Local Area Profile 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>	<p>New paragraph covering this pointed included in the revised draft policy</p>

<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 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>This suggestion is outside the 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>

Resources Department
7 Newington Barrow Way
London N7 7EP

Report of: Deputy Monitoring Officer

Meeting of: Council

Date: 8 December 2022

Ward(s): All

Subject: Dispensation request

1. Synopsis

- 1.1. The North London Waste Authority (NLWA) is the statutory joint waste disposal authority for north London and as such is responsible for the disposal of waste collected by seven north London boroughs, including the London Borough of Islington.
- 1.2. NLWA is comprised of 14 councillors, with each constituent borough appointing two councillors. The appointments are made annually at the constituent borough's annual council meeting. Councillor Rowena Champion, Executive Member Environment, Air Quality and Transport and Councillor Diarmaid Ward, Executive Member for Finance, Planning and Performance were appointed as the Council's representatives on NLWA at Annual Council on 26 May 2022.
- 1.3. NLWA is the sole shareholder in LondonEnergy Ltd (LEL). LEL operates an energy from waste (EfW) facility and other waste facilities at the Edmonton EcoPark in Enfield, and waste transfer stations and reuse and recycling centres in the north London area. NLWA has a waste services contract with LEL for disposal of the waste delivered by the constituent boroughs.
- 1.4. As a result of her appointment as Vice Chair of NLWA, Councillor Rowena Champion has been appointed by LondonEnergy Ltd to act as a director of that company and as a result, receives £13,285 per annum as compensation for the time given to undertaking this role. This payment is a disclosable pecuniary interest under the Islington Code of Conduct for Members and is included in Councillor Champion's [Register of Interests](#).

- 1.5. The appointment of Councillor Champion as Director of LondonEnergy Ltd creates a positive and direct connection from the constituent Boroughs to the NLWA to LondonEnergy Ltd, which is in the public interest as it will ultimately facilitate a better service for the Borough.
- 1.6. As the appointment has created a disclosable pecuniary interest, under the Islington Code of Conduct for Members, Councillor Champion requires a dispensation from Council to allow participation in debates and votes on matters covered by the pecuniary interest, ie matters affecting LEL. The grounds for the dispensation include that it is in the interests of residents of Islington for Councillor Champion to be able to continue to participate in debates and votes on matters relating to waste disposal, energy from waste, waste facilities, waste transfer stations and reuse and recycling.

2. Recommendations

- 2.1. To grant Councillor Rowena Champion a dispensation, to allow her to participate in debates and votes on matters relating to waste disposal, energy from waste, waste facilities, waste transfer stations, reuse and recycling and any other waste related issues until Councillor Champion ceases to be a director of LondonEnergy Ltd or until 28 July 2026

3. Background

- 3.1. Councillor Rowena Champion, Executive Member Environment, Air Quality and Transport and Councillor Diarmaid Ward, Executive Member for Finance, Planning and Performance were appointed as the Council's members of NLWA at Annual Council on 26 May 2022. Councillor Rowena Champion has been appointed as a Vice Chair of the NLWA.
- 3.2. NLWA is established as a statutory joint waste disposal authority under Schedule 1 to the Waste Regulation and Disposal (Authorities) Order 1985. The NLWA's main waste disposal functions are set out in section 51 of the Environmental Protection Act 1990.
- 3.3. Following a review to re-establish the necessary alignment between LondonEnergy Ltd and the NLWA's needs, changes have been made to the composition and membership of the LondonEnergy Lts board and it now comprises of:
Executive directors (Managing Director, Finance Director, and Operations Director);
Non-executive directors – the company's Chair, and non-execs with the following expertise – finance, health and safety, waste management, ERF plants.
Three NLWA Members – the Chair and Vice Chairs;
Four officers – the MD of NLWA, two directors from constituent boroughs, and the NLWA Head of Legal and Governance.

- 3.4. As a result of her appointment as Vice Chair of NLWA, Councillor Rowena Champion has been appointed by LondonEnergy Ltd to act as a director of that company and as a result, receives £13,285 per annum as compensation for the time given to undertaking this role. This payment is a disclosable pecuniary interest under the Council's Code of Conduct for Members and is included in Councillor Champion's [Register of Interests](#).
- 3.5. Under the Council's Code of Conduct for Members, Council may only grant a dispensation to a member to allow them to speak and/or vote in respect of an item of business at a meeting where they have a Disclosable Pecuniary Interest in limited circumstances, which include 'granting the dispensation is in the interests of persons living in the council's area'.
- 3.6. It is considered that granting the requested dispensation to Councillor Champion is in the interests of persons living in the council's area because the Disclosable Pecuniary Interest arises directly from Councillor Champion's role in LondonEnergy Ltd, where her role is to ensure there is alignment between the actions of LondonEnergy Ltd and the aims of the NLWA and its' constituent boroughs, including Islington.
- 3.7. A dispensation granted to a Member is published on the relevant council website and can last up to 4 years.

4. Implications

4.1. Financial Implications

- 4.1.1. There are no financial implications arising directly from this report.

4.2. Legal Implications

- 4.2.1. The Council has a duty to promote and maintain high standards of conduct by Members and Co-opted Members (section 27(1) Localism Act 2011). The Islington Code of Conduct for Members has been revised to incorporate the LGA Model Councillor Code of Conduct 2020 and includes the requirement to declare a Disclosable Pecuniary interest and the arrangements for dispensations.

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

- 4.3.1. There are no environmental implications arising directly from this report.

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, because there are no equalities implications arising directly from this report.

5. Conclusion and reasons for recommendations

- 5.1. Council is asked to grant a dispensation to allow Councillor Rowena Champion to participate in debates and vote on matters relating to waste disposal, energy from waste, waste facilities, waste transfer stations, reuse and recycling and any other waste related issues, as detailed in the recommendation in this report because it is in the best interests of the residents of the borough.

Appendices: None.

Background papers: None.

Final report clearance:

Signed by:



Julian Walshaw, Deputy Monitoring Officer

Date: 30 November 2022

Report Author: Philippa Green, Head of Democratic Services and Governance

Tel: 020 7527 3184

Email: Philippa.green@islington.gov.uk



COUNCIL MEETING – 8 DECEMBER 2022

NOTICES OF MOTION

Motion 1: Gambling Act Review

Proposed by: Cllr Angelo Weekes

Seconded by: Cllr Joe Croft

This Council notes:

- The government has promised to deliver a Gambling Act Review white paper, which seeks to amend our gambling laws, so they are fit for a digital age.
- The Gambling Act review has been in motion since late 2020, however various delays by the Tories, the main being the changes in personnel, with five different ministers overseeing the legislation, has meant outdated and insufficient laws failing to protect vulnerable gamblers.
- The Tories also delayed reform to the £2 cap for bets placed on fixed-odds betting machines, which have been linked to crippling debt, marriage and family breakdown and serious mental health issues. Originally due to come into force in April 2019, it was delayed to October 2019; the extra 6 months of delay allowed bookmakers to collect £900m from gamblers.
- Since August 2020, 19 Conservative MPs have taken almost £225,000 in wages and freebies from the gambling industry, demonstrating the attempt by the industry to influence the outcome of the Gambling Act review to their own advantage.
- The House of Lords Gambling Industry Select Committee found 60% of the profits from online gambling are coming from the 5% of consumers experiencing harm, with around half of the more than £6 billion in online gambler losses attributable to slots.
- The significant harms associated with gambling, not least mental health issues arising from this health-harming addictive activity.
- The Public Health England evidence review of gambling-related harms in England found that gender and poor mental health were the strongest indicators of gambling related harm:
 - men were 4.2 times more likely than women to be gambling at levels of elevated risk of harm
 - people identified as having some mental health issues were twice as likely to participate in harmful gambling than people with no mental health issues
 - those who indicated they had a mental health condition were 2.4 times more likely to be a gambler experiencing gambling-related harms

To ensure the government's objectives are met, this Council formally support all of the following reforms:

- The introduction of limits to stakes, prizes and speed of play online, as already exist for the same content found on venue-based machines. Online slots should be capped at £2 a spin, in line with Fixed Odds Betting Terminals in betting shops and machines found in other easily accessible gambling venues.
- A standardised threshold at which enhanced affordability checks take place for all licensed online gambling operators. We support the Social Market Foundation's recommendation that these checks should take place when a person's losses exceed £100 within a month.
- The introduction of a statutory levy on gambling operators for research, education and treatment that should be administered through an independent public body. This levy should initially be set at 1% of gross revenue but should be increased in line with need, in accordance with the 'polluter pays' principle.
- An end to gambling advertising, promotion, and sponsorship. Children should not be exposed to gambling advertising at all, and given the degree of harm which arises from online gambling, the sector should not be promoted in its current form. The government should emulate gambling advertising restrictions in Italy and Spain on public health grounds.
- The creation of a dedicated Gambling Ombudsman which would ensure consumers who have been treated unfairly by gambling operators are able to access a means for redress.
- Reform to the statutory 'aim to permit' so the local authorities have the power to reject premise license applications in the event that the licensing objectives of fair and open gambling, preventing gambling crime, and preventing gambling harm are less likely to be delivered with additional outlets.

This Council resolves to:

- Write to the Minister overseeing the Gambling Act Review, Paul Scully MP, informing him of our priorities for reform as reflected above and to ask the government to consider gambling a public health issue.
- Commence a proposal under the Sustainable Communities Act to push for legislative reform that will empower local authorities to better regulate gambling.
- Implement the reviewed and revised Gambling Premises Licensing Policy 2023-2025 (pending adoption by this Council). This robust policy will ensure applicants and operators whose premises are used for gambling have taken stringent steps to prevent gambling being a source of crime and disorder and to protect people from gambling related harm.

Motion 2: Right to Food

Proposed by: Cllr Una O'Halloran

Seconded by: Cllr Ruth Hayes

This Council notes:

- That we are seeing a crisis of food poverty which has now reached a tipping point for so many in our communities.
- The current cost of living crisis has thrust hundreds of thousands of people into poverty, with many having to decide between heating their homes and eating a meal.
- The national and international context have only served to exacerbate the problems impacting some of our most disadvantaged communities more acutely.
- The figures are devastating for one of the richest nations in the world and highlight the inequality of the UK in 2022.
- The need for food banks already being at a record high. Food banks in the Trussell Trust network gave out 2.1 million emergency food parcels between April 2021 and March 2022, a 14% rise compared to the same period in 2019/20.
- Additionally, a record 2.5 million parcels were distributed nationally during the pandemic years of 2020/21.

This Council further notes:

- The high rates of deprivation across our borough, with Islington having very high rates of child poverty at 38% and 28% of residents overall facing income-deprivation. We recognise the devastating impact that a perfect storm of soaring energy, food, and petrol prices plus below-inflation rises in wages and benefits has on our residents.
- Islington's Trussell Trust Food Bank distributed 5,784 food parcels, including 1,804 for children between April 2021 and March 2022, and that this was an increase of 1,121 parcels compared to the year before.
- Foodbank usage is just one aspect of the food support provided by community groups, which residents require, and that the need for local food support is only going to increase as we become further entrenched in the cost of living crisis.
- There is a need for drastic local action to protect our residents from the damaging effects of food insecurity.
- Our Community Wealth Building Team have been supporting residents via the Resident support scheme, distributing over £1.9m in grants between 2021/22.
- Between April-September 2022, a further £2.2m of support was distributed to residents via the Household Support Fund to support residents at the sharp end of the cost of living crisis. This included support to free-school-meal households, and low income households with children, covering the May half-term and summer holiday period. Support with fuel, food, and clothing of over £6,000 was provided by the Council.
- All pregnant women, breastfeeding mums and children under four years can receive Healthy Start vitamins. Co-ordinated in the borough by Islington's

Public Health team, the universal provision of Healthy Start vitamins goes above and beyond the current government offer which is limited to women that are pregnant and children under the age of one. Additionally, families in receipt of income support and where the child is under one may receive an £8.50 voucher, with pregnant women eligible for £4.25 a week, and an additional £4.24 for each child aged under one year.

- Since 2011, Islington Council have provided universal free school meals for nursery and primary school children in all maintained schools, and this has been a very effective policy that provides support in vital early years.
- The Holiday Activities and Food (HAF) programme provides free food packages and activities to free school meal eligible children, operating during the Easter, Summer, and Winter holidays. Last summer, HAF delivered over 20,000 meals for people in need, 37% of the free school meal population.
- The Islington Food Partnership provides residents with information about community food services along with opportunities for residents to 'influence local food strategy services' such as through their 'Community Conversations' events.
- Islington Council's environmental team have been working alongside Octopus Community Network to utilise unused areas and turn them into growing spaces to tackle food poverty. Examples of this can be seen in the Hollins and McCall Estate in Tufnell Park, and the Andover Garden Squares in Finsbury Park ward.
- That after 12 years of austerity by Central Government which has led Islington Council being forced to make £281 million of budget savings, it is becoming even more difficult for the Council to offer the support it needs.

This Council resolves to:

- Become a Right to Food borough and to support the Right to Food Campaign's five demands to Government urging that these be delivered nationally as a matter of urgency. These demands are:
 1. **Universal free school meals.** No child should go hungry and the Right to Food campaign is calling for free school meals for every child.
 2. **Government to state how much of minimum wages and benefits (on which people are expected to live) is for food.** The Right to Food Campaign wants Government to reveal how much money is factored in for food when setting minimum/living wages and benefits.
 3. **Independent enforcement of legislation.** Right To Food legislation must be accompanied by oversight and enforcement powers granted to a new independent regulatory body that will hold Government to account.
 4. **Community Kitchens.** The Right to Food Campaign believes Community Kitchens provide a workable solution to food poverty. Government should fund dining clubs and 'meals-on-wheels' services for older people and others who are not able to shop and/or cook meals, school holiday meals for those most in need and cookery clubs for the wider community.
 5. **Ensured food security.** Government must ensure food security and take this into account when setting competition, planning, transport, local

government, and all other policy.

- Stand alongside our communities in the face of the cost-of-living crisis, demonstrating leadership in tackling food insecurity and going further than the Right to Food Campaigns demands on a local level by committing to Islington's upcoming Food Strategy 2023-28 as pledged in the Islington Labour manifesto for the 2022 Local Elections.

Motion 3: Solidarity with striking workers

Proposer Cllr Benali Hamdache

Seconder Cllr Caroline Russell

This Council notes:

- The UK is facing a wave of industrial action in the wake of rising inflation, a cost-of-living crisis and paltry pay offers
- That the Royal College of Nurses has announced strikes for the 15th and 20th December
- The National Union of Rail, Maritime and Transport Workers has announced strikes on 13th, 14th, 16th and 17th December and on 3rd, 4th, 6th and 7th January
- Major education unions in England are balloting their members on possible strike action over pay
- Over 70,000 staff at 150 universities across the UK took three days of strike action over attacks on pay, working conditions and pensions
- That unions already only resort to strikes after negotiations are exhausted
- That under Article 11 of the European Convention on Human Rights, everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of their interests
- That the Conservative government has consistently failed to offer adequate pay offers to workers and has repeatedly undermined the right to strike

This Council further notes:

- Islington Council has committed to supporting trade unions and trade union membership, promoting the value of unionisation across the borough
- That all over the country, workers are winning pay disputes and improved wages through the power of collective action
- The Conservative government is trying to undermine the right to strike by allowing agency workers to become strike-breakers
- That decades of anti-union laws have given us the tightest regulations on strikes in the advanced industrial world

This Council resolves to:

- Continue promoting union membership to Islington's residents and to work collaboratively with the unions representing the Council's workers
- Support the attendance of Islington's two MPs at picket lines in solidarity with striking workers

- Write to the Secretary of State for Business, Energy and Industrial Strategy in opposition to anti-trade union laws, like the banning of online ballots and strikebreaking agency workers
- Write to the Secretary of State for Justice in opposition to the proposed British Bill of Rights, that threatens the right of workers to organise collective action

Motion 4: Gypsy, Roma and Traveller Accommodation Needs

Proposer Cllr Jegorovas-Armstrong
 Seconder Cllr Caroline Russell

This Council notes:

- In January 2019 the London Borough of Islington commissioned consultants to undertake a Gypsy, Roma and Traveller Accommodation Needs Assessment study (GTAA) for the period 2020-2035.
- Consultations with Gypsy, Roma and Traveller households took place between February and April 2019. Households spoke about wanting to stay in Islington or nearby, whether on a site or in housing.
- There are no residential caravan sites occupied by members of the settled community or Travelling Showpeople located within Islington.
- The consultation concluded that ten Gypsy, Roma and Traveller permanent accommodation pitches are required in the borough.
- Policy H14 of the London Plan requires boroughs to meet the identified need for permanent Gypsy, Roma and Traveller pitches and include ten-year pitch targets in their Local Plans.
- The provision for permanent Gypsy and Traveller pitches is included in the latest Islington Local Plan (February 2020).
- The site search process has been initiated as part of the council's ongoing housebuilding programme.
- The London Plan highlights that around 85% of Gypsy, Roma and Traveller families in London have been forced to live in housing, or on roadside encampments due to overcrowding, or an unsuitability, or lack of availability of, pitches.
- The lack of legal permanent sites makes accessing key services and facilities much harder.
- Gypsy, Roma and Traveller families must be granted the right to a decent home that meets their needs, which for them entails sites to accommodate caravans.
- For many Gypsies, Roma and Travellers, living in a caravan is an essential part of their ethnic identity. Romany Gypsies and Irish Travellers are covered by the protected characteristic of race under the Equality Act 2010.

This Council further notes:

- Gypsy, Roma and Traveller people have the worst outcomes of any ethnic group across a huge range of areas including access to suitable accommodation, healthcare, education, employment, financial services, policing, justice and probation.
- National and local policymakers have not provided for the services to support the needs of Gypsy, Roma and Traveller people.

- A study carried out by The Traveller Movement (2017) found that 91% of Gypsy, Roma and Traveller people had experienced discrimination because of their ethnicity and 77% had been victims of hate speech or a hate crime.
- The most common forms of hate speech and crime experienced include exclusion and discrimination from and within services, e.g., health, education (experienced by 94%), reinforcement of negative stereotypes (89%), social media abuse (87%) and media incitement to racial hatred (82%).
- Hate incidents begin early in life, with school children reporting feeling that they must hide that they are Gypsy, Roma or Traveller.
- Islington Council marks Gypsy, Roma and Traveller History Month during the month of June.

This Council resolves to:

- Continue to mark Gypsy, Roma and Traveller History Month every year to raise awareness of the prejudice faced by the Gypsy, Roma and Traveller community.
- Use this month to amplify the voices of the Gypsy, Roma and Traveller community and raise awareness amongst Islington's residents about their unique history, culture and heritage.
- Share resources from, and promote the campaigns of, groups such as the Friends, Families and Travellers organisation, London Gypsies and Travellers, and The Traveller Movement.
- Address the inequalities that the Gypsy, Roma and Traveller community face.
- Ensure that Gypsies, Roma and Travellers experience an inclusive, fair and understanding community in Islington.
- Actively nurture harmonious relations between the settled community and the residents of any future Gypsy, Roma and Traveller site in Islington.
- Provide sustainable, green and biodiverse sites with facilities that are well insulated, well ventilated and affordable to heat in winter.
- Provide effective site management for Gypsy, Roma and Traveller sites in the borough.
- Provide training to key staff in Islington schools around successful practice working with families from Gypsy, Roma and Traveller backgrounds, including raising awareness around the culture and history of the Gypsy, Roma and Traveller community.
- Encourage and support Islington schools in signing The Gypsy, Traveller, Roma, Showmen and Boaters' Pledge for Schools.
- Improve data collection around the experiences of the Gypsy, Roma and Traveller community, in order to improve their outcomes across key social and economic indicators.

This page is intentionally left blank