

NOTICE OF MEETING

FULL COUNCIL

**Monday, 18th November, 2024, 7.30 pm - Tottenham Town Hall,
Tottenham Town Hall Approach Road, N15 4RY (watch the live [Here](#)
and watch the recording [here](#))**

Councillors: Anna Abela, Gina Adamou, Peray Ahmet, Ibrahim Ali, Kaushika Amin, Emily Arkell, Dawn Barnes, Nicola Bartlett, John Bevan, Barbara Blake, Mark Blake, Zena Brabazon, Cathy Brennan, Lester Buxton, Dana Carlin, Liam Carroll, Luke Cawley-Harrison, Seema Chandwani, Lotte Collett, Pippa Connor, Eldridge Culverwell, Nick da Costa, Lucia das Neves, Isidoros Diakides, Erdal Dogan, George Dunstall, Sarah Elliott, Scott Emery, Ruth Gordon, Mark Grosskopf, Makbule Gunes, Mike Hakata, Holly Harrison-Mullane, Tammy Hymas, Emine Ibrahim, Marsha Isilar-Gosling, Thayahlan lyngkaran, Sue Jameson(Mayor), Cressida Johnson, Anna Lawton, Ahmed Mahbub, Mary Mason, Khaled Moyeed, Sean O'Donovan, Felicia Opoku, Ajda Ovat, Sheila Peacock, Reg Rice, Alessandra Rossetti, Adam Small, Michelle Simmons-Safo, Anne Stennett, Joy Wallace, Elin Weston, Matt White, Sarah Williams and Alexandra Worrell

Quorum: 15

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. TO RECEIVE APOLOGIES FOR ABSENCE

3. TO ASK THE MAYOR TO CONSIDER THE ADMISSION OF ANY LATE ITEMS OF BUSINESS IN ACCORDANCE WITH SECTION 100B OF THE LOCAL GOVERNMENT ACT 1972

4. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

- 5. TO APPROVE AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE COUNCIL HELD ON 22ND OF JULY 2024 AND 10 OCTOBER 2024 (PAGES 1 - 28)**
- 6. TO RECEIVE SUCH COMMUNICATIONS AS THE MAYOR MAY LAY BEFORE THE COUNCIL**
- 7. TO RECEIVE THE REPORT OF THE CHIEF EXECUTIVE (PAGES 29 - 32)**
 - i) Appointment of Honorary Recorder of Haringey
- 8. TO RECEIVE THE REPORT OF THE MONITORING OFFICER AND HEAD OF LEGAL SERVICES**
- 9. TO RECEIVE REPORTS FROM THE FOLLOWING BODIES (PAGES 33 - 196)**
 - a) The Cabinet
 - b) Audit Committee
 - c) Standards Committee – report to follow
- 10. TO CONSIDER REQUESTS TO RECEIVE DEPUTATIONS AND/OR PETITIONS AND, IF APPROVED, TO RECEIVE THEM**
- 11. TO ANSWER QUESTIONS, IF ANY, IN ACCORDANCE WITH COUNCIL RULES OF PROCEDURE NOS. 9 & 10**

Cllr Connor to Cllr Arkell

1. There have been a number of complaints regarding the running of the leisure centres since the council took over; and in particular shock and anger at the reduction in hours to the Lido - something that was not publicly proposed prior to the takeover. The justification for bringing the service in-house was a better service for residents, but when will residents see improvements and much better engagement?

Cllr Barbara Blake to Cllr Williams

2. We have embarked on an ambitious house building programme with 3000 council homes due to be completed. Many of these properties are acquisitions and form part of larger developments. Can the cabinet member outline how this and other measure are helping to address the housing crisis facing many families in Haringey.

Cllr Emery to Cllr Williams

3. Haringey housing workers walked out on strike in the middle of October over a number of issues, including representatives of the Union saying that resident safety was not being taken seriously. Talking to the press in response, Cllr Williams said that "All repairs can be reported to us in the usual way, and we expect to deal with emergencies within the usual 24 hours to keep our residents safe and comfortable." However when a resident reported an emergency repair for a ceiling leak they were told that due to the strike, unless it was life-threatening, nothing could be done at that time. Just a couple of days later this ceiling collapsed on her daughter's cot. What is being done on strike days to ensure that urgent repairs like this are attended to in a timely manner, to avoid potentially catastrophic results?

Cllr Sheila Peacock to Cllr Ruth Gordon

4. Haringey's Civic Centre is a central part of Haringey's history, and many residents have fond memories of it. We are proud that we are investing in this building. Can the cabinet member provide an update on the Civic Centre Redevelopment Programme?

Cllr Cawley-Harrison to Cllr Carlin

5. How confident are you that you will be able to close the budget gap this year and set a balanced budget, and are you already in discussions with the government about if you are unable to?

Cllr Grosskopf to Cllr Brabazon

6. The new Government has put education at the heart of the Autumn Budget. Tripling of Breakfast club funding, £6.1 Capital investment for

building and maintenance, and £1bn for SEND provision. Can the cabinet member tell us about the work the council is doing to support young people in the Borough?

Cllr Mason to Cllr Ovat

7. Twenty nine thousand and seventy three people (one third) in Haringey are struggling to pay rents, buy food, and pay their bills. 12.7% of whom are at risk or in crisis. Increasing numbers of households are filling an essential gap for these families. Currently at least four food banks in Haringey do not have premises or are threatened with having to leave their premises.

Please can you assure us that you will actively and urgently support the use of empty council owned properties by Food Banks and ensure that the scheme is running before the Christmas break.

Cllr Simmons-Safo to Cllr Chandwani

8. Can the Cabinet Member provide an update on the Council's work supporting residents with the Universal Credit migration?

9. Cllr Ibrahim to Cllr Ovat

Can the Cabinet Member outline the work being done to tackle hate crime in Haringey?

12. TO CONSIDER THE FOLLOWING MOTIONS IN ACCORDANCE WITH COUNCIL RULES OF PROCEDURE NO. 13

Motion E

Winter Fuel Allowance

Proposer: Cllr Scott Emery

Seconder: Cllr Nick da Costa

Council notes:

- The Labour Government has restricted eligibility for Winter Fuel Payments to those on means-tested benefits (primarily Pension Credit); reducing the number of people eligible for Winter Fuel Payments from around 12 million to 1.2 million;
- The government is set to receive a windfall of £1.5 billion from Octopus Energy, which would be enough to reinstate Winter Fuel Payments for this year;
- The most recent statistics showed 27,145 households in Haringey were in receipt of the winter fuel allowance, an estimated 74% of whom will lose out under the government's rule changes;

- To receive Pension Credit a single pensioner must have an income of less than £11,343.80 per year, compared with a full-time living wage salary of £20,820.8 per year;
- 37% of those eligible do not claim pension credit, and 780,000 pensioners earning below £11,400 per year will no longer receive the Winter Fuel Payment under Labour's plans, according to the government's own equalities analysis;
- Data from Policy in Practice shows that almost £17 million of pension credit goes unclaimed in Haringey each year, affecting over 4000 households;
- Haringey's analysis shows that there are 815 eligible residents not claiming pension credit in the borough;
- 4 out of 5 pensioners due to lose the Winter Fuel Payment are on or below the poverty line according to Age UK;
- The Energy Price Cap has risen by 10% in October, which, combined with restricted eligibility for Winter Fuel Payments, will push thousands of local pensioners into fuel poverty;
- Many councils are planning to use the Household Support Fund to provide payments to pensioners who are missing out on the winter fuel payment, and Haringey has confirmed its plans to provide a payment from the council to 2,804 pension aged households claiming council tax reduction scheme.

Council believes:

- Balancing the government's budget on the back of vulnerable pensioners is morally wrong;
- The government's decision to use claiming pension credit as its criterion for receiving the winter fuel payment, whilst knowing that more than a third of those eligible do not claim, was an unethical choice;
- It is wrong for councils to have to compensate for central government cutting support for some of the least affluent in society, particularly at a time of stretched budgets;
- Elderly people with an income as low as £218.15 per week are not affluent, and many are vulnerable and at risk of health problems from cold weather;
- It has responsibilities to the most vulnerable to protect them from avoidable public health risks;
- That a review of the eligibility criteria for the Winter Fuel Allowance should take place immediately, in consultation with pensioner representative groups, ensuring that pensioners on low and middle incomes are protected this winter.

Council resolves:

- To use the Household Support Fund to provide a payment from the council to pension aged households claiming council tax reduction scheme;
- To examine what support can be provided to these same households in future years, once the Household Support Fund has been removed by government;

- To redouble public information campaigns to encourage greater uptake of Pension Credits by those who are entitled to them;
- To instruct the Leader of the Council and the Chief Executive to write to the Chancellor of the Exchequer and Secretary of State for Work and Pensions, copied to Haringey's Members of Parliament, to set out Haringey Council's concerns on this matter, to request that a review along the lines described above takes place, and to request that they reverse the policy of linking Winter Fuel Allowance payments to receipt of Pension Credit.

Motion F

Title: SEND provision in Haringey

Proposer: Cllr Zena Brabazon

Seconded: Cllr Makbule Gunes

This Council notes:

In England, 1.6 million young people have special educational needs, a rise of 6.3% since 2023;

In Haringey, there are approximately 8,000 children and young people who require SEN support and 2,974 who have an education, health and care plan (EHCP). Compared with the previous year, there has been a 22% increase in the number of requests for an assessment for an EHCP and an overall increase of 6% for children with EHCP's;

In the Autumn budget, the new government announced a package of investment measures to support young people and families across the UK. These included tripling breakfast club funding, £6.1bn in capital investment for rebuilding and maintaining schools and £2.3bn for revenue investment which includes £1bn in additional SEND funding;

The Mayor of London has announced the extension of universal free school meals to primary aged children which has allowed schools to access additional essential pupil premium funding;

This administration is committed to strengthen Children's Services in Haringey and officers have worked collaboratively with partners and community groups such as SEND Power to enhance our support to young people and families in;

Children's Services were awarded a Good by Ofsted for the first time in its history and was awarded the highest rating in its SEND service provision by a joint Ofsted and CQC inspection;

The Safety Valve Programme, implemented by this administration, has enabled the council to create an additional 170 places for young people with SEND in partnership with mainstream and special schools across the borough;

The Safety Value Programme has supported us in extending capacity in mainstream and special schools in-borough, which enables a local and integrated education, care, and support to be close to families and support networks, especially those with the most complex needs.

This Council believes:

That 14 years of underinvestment in SEND has put local authorities and their ability to deliver their statutory obligations and provide the best support under strain;

That future investment, resources and research in how local authorities meet the most complex needs in the SEND high needs block is vital;

Ensuring that funding is available and sufficient for all young people who require additional support to be able to access it.

This Council resolves:

To call on the UK government to enhance routes to accessing support for all that need it such as providing better diagnosis of special needs;

To call on the UK government for further funding for local authorities to improve outcomes for children and young people;

To write to the Secretary of State for Education to highlight our implementation of the Safety Valve programme, invite her to visit and see firsthand the success it and other measures have had on SEND provision in Haringey.

Ayshe Simsek,
Democratic Services and Scrutiny Manager
Tel – 020 8489 2929
Fax – 020 8881 5218
Email: ayshe.simsek@haringey.gov.uk

Fiona Alderman
Assistant Director for Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Friday, 08 November 2024

This page is intentionally left blank

MINUTES OF THE MEETING Full Council HELD ON Monday, 22nd July, 2024, 19.30 – 21.35pm

PRESENT:

Councillors: Anna Abela, Peray Ahmet, Ibrahim Ali, Kaushika Amin, Emily Arkell, Dawn Barnes, Nicola Bartlett, John Bevan, Barbara Blake, Mark Blake, Zena Brabazon, Cathy Brennan, Lester Buxton, Dana Carlin, Carroll, Luke Cawley-Harrison, Seema Chandwani, Lotte Collett, Pippa Connor, Eldrige Culverwell, Lucia das Neves, Isidoros Diakides, Erdal Dogan, George Dunstall, Scott Emery, Ruth Gordon, Mark Grosskopf, Makbule Gunes, Mike Hakata, Holly Harrison-Mullane, Tammy Hymas, Emine Ibrahim, Thayahlan Iyngkaran, Sue Jameson (Mayor), Cressida Johnson, Anna Lawton, Ahmed Mahbub, Mary Mason, Sean O'Donovan, Felicia Opoku, Ajda Ovat, Sheila Peacock, Reg Rice, Rossetti, Michelle Simmons-Safo, Adam Small, Joy Wallace, Elin Weston, Matt White and Alexandra Worrell

ALSO ATTENDING:

17. FILMING AT MEETINGS

The Mayor referred to the filming at meetings notice and attendees noted this information.

18. TO RECEIVE APOLOGIES FOR ABSENCE

The following apologies for absences were noted:

Cllr Williams

Cllr Elliott

Cllr Isilar- Gosling

Cllr Rossetti

Cllr Adamou

Cllr da Costa

Apologies for lateness was noted from Cllr Stennett and Cllr Peacock.

19. TO ASK THE MAYOR TO CONSIDER THE ADMISSION OF ANY LATE ITEMS OF BUSINESS IN ACCORDANCE WITH SECTION 100B OF THE LOCAL GOVERNMENT ACT 1972

The Mayor accepted the following late items of business following the reasons set out below.

Item 7- Report on Proportionality and Appointments to Committees
Item 11a – Report from the Audit Committee
Item 11b – Report from the Alexandra Palace and Park Board
Item 11c) Report from the Standards Committee
Item 13 Questions and Written Answers
Item 14 Motions

Item 7 was late as there was a need for political group consultations on the appointments to committees following the by election on the 4th of July.

In relation to the reports under item 11, reports from Committees, these were late as the meetings took place after the publication of the Council papers and there was a need to consider these recommendations prior to the November Council meeting.

In relation to Item 13 Questions and Written Answers - The reason for lateness was that notice of questions was not requested until 8 clear days before the meeting, following which the matters raised have to be researched and replies prepared to be given at the meeting.

Item 14 – Motions - The amendments to motions were not requested until 10am on the day of the Council meeting and an amendment to Motions A & B and had been published and distributed today in the tabled pack.

20. DECLARATIONS OF INTEREST

NONE

21. TO APPROVE AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE COUNCIL HELD ON 20TH OF MAY 2024

RESOLVED

To approve the minutes of the meeting held on the 20th of May 2024 as an accurate record of the meeting.

22. TO RECEIVE SUCH COMMUNICATIONS AS THE MAYOR MAY LAY BEFORE THE COUNCIL

The Mayor spoke of the Council's sadness on hearing of the death of former Councillor Andy Krokou. Andy had served three terms as a Councillor and was active in the community, lending his time and support to, amongst others, to the Tottenham District Charity.

The Mayor called on the Leader of the Council who paid tribute to former Councillor Andy Krokou speaking about his work for the Council as well as the Tottenham Grammar School charity and being the first Councillor of Cypriot origin to represent the Council.

The Leader of the Council gave the Council's condolences to Andy Krokou's family.

The Mayor continued to lead the Council in a one minute silence.

The Mayor mentioned that Judge Noel Lucas has stepped down as the Honorary Recorder following the end of his tenure at Wood Green Crown Court and she expressed the Council's gratitude for his work as Honorary Recorder for the Borough.

The Council welcomed the opportunity to better understand the work of the Crown Court and to forge closer links for the benefit of our residents. In a forthcoming meeting the Council would be welcoming Judge John Dodd KC to this role and will speak further on this matter.

The Mayor had emailed Councillors the details of the engagements undertaken since the annual meeting. she continued to highlight the following particular events:

- Go Green – these continued the Council's effort to reduce waste and promote reuse and recycling.
- Junior Park Run in Lordship recreation ground.
- Ethiopian sports and culture day at New River Sports Centre.
- Armed Forces Day, Windrush and Pride month.

23. TO RECEIVE THE REPORT OF THE CHIEF EXECUTIVE

The Chief Executive introduced the report which was asking Council to note the political composition of the Council following the Hornsey by election and to agree that Cllr Small be appointed to the Audit Committee and the Licensing Committee.

The Chief Whip MOVED the recommendations, and it was,

RESOLVED

1. To Note the political composition set out at paragraph 4.2.
2. To agree that Cllr Adam Small be appointed to the Licensing Committee and Audit Committee to fill the Labour Group allocated Committee vacancies as set out at paragraph 4.7 and Appendix 1.

24. TO RECEIVE THE REPORT OF THE MONITORING OFFICER AND HEAD OF LEGAL SERVICES

The Monitoring Officer had no matters to report on.

25. CSO 3.1(VI) RECEIVE ANY ANNOUNCEMENTS FROM THE LEADER OF THE COUNCIL

The Leader set out the Labour administration's mid-term achievements. She added that the Council had published the Corporate Delivery Plan for the next two years, which sets out the Council's ambition to focus on delivering a fairer, greener borough. She added that good progress had been made in getting the basics right through the Haringey Deal.

The Leader continued to outline the following achievements:

- Good Co production through engagements like Tottenham Voices and Wood Green Voices.
- Supported more than 26,000 families with Council tax relief.
- Ensured that help is in place for 4000 families through the Haringey Support Fund in partnership with the Mayor of London, providing free school meals for primary school children.
- Rolled out 34 new school streets that are protecting 16,000 pupils, compiled 147 bike hangers and planted 4000 trees.
- SEND services received a top rating and Children's Services awarded good. 98% of borough schools rated either good or outstanding, and school exclusions well below the average.
- Launched two new family hubs and have just announced a groundbreaking music hub.
- Haringey Works has around 800 people into work.
- Progress in delivering 3000 Council homes by 2031.
- Taking action on empty homes, with owners of homes left empty for 12 months now required to pay double Council Tax.
- Tackling rogue property owners, working hard to deliver a safer borough, and taking action to tackle hate crime.
- Innovative work on stop and search to improve relations between the community and the police.
- Despite government cuts of £143M less in real terms, setting a balanced budget in March 2024. This was done whilst protecting key services and keeping libraries open and investing in them.
- Agreed to bring Leisure services back in house.
- Awarded London Borough of Culture for 2027.

Noted the launch of six Cabinet champions where backbench Councillors will support the Cabinet and focus on key priority areas.

26. TO MAKE APPOINTMENTS TO OUTSIDE BODIES

The Chief Whip MOVED that the Council note the changes to the LGA Grants Committee which was an association body exercising executive functions as set out in article 10.8b(i).

RESOLVED

To note that the Leader of the Council, Cllr Peray Ahmet is nominated to the LGA Grants Committee as the lead representative for Haringey and that Cllr Williams, Cabinet Member for Housing and Planning (Deputy Leader) is the Deputy. This was an Association body which mainly exercise 'executive' functions and the change is set out at Appendix 1 and in accordance with article 10.8b(i).

27. REPORTS OF COMMITTEES

There were three reports to consider as part of this item. These were reports from the Audit Committee, Alexandra Palace and Park Board and The Standards Committee.

Councillor Dogan MOVED his report and recommendations on the Local Code of Corporate Governance and noting the treasury management update.

RESOLVED

1. To adopt the attached Local Code of Corporate Governance, attached at Appendix A of the report.
2. To note the treasury management activity undertaken during the financial year to 31 March 2024 and the performance achieved which is attached as Appendix B to this report.
3. To note that all treasury activities were undertaken in line with the approved Treasury Management Strategy.

Cllr Ibrahim, Chair of Alexandra Palace and Park Board MOVED her report on minor changes to Alexandra Park and Palace Consultative Committee terms of reference.

RESOLVED

1. To approve the changes to the Constitution of the Consultative Committee, reducing the number of members to be co-opted to the Board from 3 to a maximum of 2.
2. To note that the Appointments to Committee appendix at agenda item 7 has been updated to reflect this change as required by Part Three Section B sub section 3 (Sub Committees and Panels).

Cllr Ali , Chair of Standards Committee to MOVED his report on appointment of Independent persons to the Committee.

1. To approve the appointment of Stephen Ross as Independent Person, and Ian Balbi as secondary Independent Person under s28(7) of the Localism

Act 2011 for a period of 4 years commencing 31 July 2024 and ending on 30th June 2028;

2. To approve the allowance to be paid to the Independent Person, and Secondary Independent person at £1250.00 and £250.00 per annum respectively.

28. TO CONSIDER REQUESTS TO RECEIVE DEPUTATIONS AND/OR PETITIONS AND, IF APPROVED, TO RECEIVE THEM

There were no deputations or petitions to consider as part of this item.

29. TO ANSWER QUESTIONS, IF ANY, IN ACCORDANCE WITH COUNCIL RULES OF PROCEDURE NOS. 9 & 10

The Council continued to RECEIVE the response to written questions.

Oral questions one to nine were then asked and responded to.

30. TO CONSIDER THE FOLLOWING MOTIONS IN ACCORDANCE WITH COUNCIL RULES OF PROCEDURE NO. 13

Motion A was proposed by the Leader of the Council, who welcomed the new Labour government and congratulated newly elected MPs: David Lammy, Catherine West, Bambos Charalambous and Tulip Sadiq with additional congratulations to David Lammy, Catherine West and Tulip Sadiq on their roles in government, and especially David Lammy MP, on his appointment as Foreign Secretary.

The Leader welcomed Councillor Adam Small, who had also been elected to serve the Council as a Councillor in Hornsey ward.

The Leader spoke of the new government working towards recovery, rebuilding of the country, and turning manifesto pledges into a legislative programme to transform and deliver for the country. She highlighted a number of their objectives including: improving rail services, creating clean power, keeping household bills down, a new deal for workers' rights to protect workers, raising standards in education, enhancing children's well-being, and an overhaul of the planning system to start building the houses people so desperately needed.

Cllr Liam Carroll seconded the motion and spoke about the assurances being given on energy bills and how this would provide savings for Haringey residents. He referred to the warmer homes plan and called upon the government to work with Haringey Council, the Mayor of London, and local businesses, to insulate homes that stay warmer in the winter period and cooler in the summer periods in turn supporting local jobs in this area.

Councillor Cawley-Harrison moved the amendment to the motion and highlighted that although the needs of the residents were mentioned, there was no mention of funding. He emphasised that the Council had spoken about austerity over the past few years

and now was the opportunity to do something and request further funding from the new government.

Councillor Connor seconded the amendment and highlighted that one of the greatest problems facing Haringey was finances, she stated that Haringey Council's General Fund was approximately 19 million pounds overspent.

The Mayor called Councillors to speak in the debate and Councillors: Lawton, Barbara Blake and Cllr Small spoke about the following issues:

- Supporting the NHS and ensuring better working conditions for Doctors, nurses and NHS staff.
- The return of housing targets and the creation of a national wealth fund.
- Tackling the urgency of the global climate challenge.
- Strengthening community policing, investing in the police force, which was underfunded and enhancing support for victims, specifically in relation to funding to stop violence against women and girls.
- Investment in the prison service.
- The United Kingdom borders being protected with fair and humane policies for all.
- Making difficult choices to tackle long-standing problems and bringing innovative ideas to complex policy challenges.
- Breaking down the barriers to opportunity that many of Haringey residents faced here in this borough.
- Tackling economic insecurity at work, at home, in communities and in public services.
- Locally building around 3000 new Council homes by 2031, as well as focusing on a greener future by cleaning up the air, delivering greener neighbourhoods and protecting parks.
- Producing an industrial strategy, a national wealth fund, and a new deal for working people.
- End to zero hour contracts and heinous employment practices and establishing a new network of youth hubs.
- The government planned to recruit 6500 new teachers and cut NHS waiting times, which would deliver a new Race Equality Act. This meant a more active, smarter government that worked in partnership with local leaders and local authorities.
- Supporting the Planning team to help Haringey to deliver, transform and shape the communities' needs.

The Leader of the Council responded to the amendment and following a vote on the amendment to the Motion, the amendment was LOST

Following a vote to the Original Motion, this was AGREED.

The Council notes that

Following a General Election held on 4th July 2024, the Labour Party formed a majority government following a landslide election victory in which 412 Labour MPs were elected to Parliament, and 72 Liberal Democrat MPs were elected to Parliament.

Haringey now has four Labour MPs representing the borough in Parliament: Tulip Siddiq (Hampstead and Highgate), David Lammy (Tottenham), Catherine West (Hornsey and Friern Barnet) and Bambos Charalambous (Southgate and Wood Green).

The new Labour government's commitment to fixing the damage caused by the Conservative Party's mismanagement of our economy and neglect for public services is unwavering and put forward a credible and costed plan in their 2024 Election Manifesto.

The Labour government is firmly committed to being fiscally responsible and will implement policies like the Fiscal Lock and spending rules to ensure public finances are protected, spent effectively and not wasted.

The Labour government has promised to rethink Council funding by exploring multiyear funding settlements, end wasteful competitive bidding and overhauling the local audit system.

The Labour government plans to work in closer partnership with nations, regions and local authorities and widen devolution to more areas, encouraging local authorities to come together and take on new powers.

The Labour government have committed to asking local authorities to begin preparatory work to join on economic geographies and take on a new suite of powers through an enhanced devolution framework to benefit local residents.

The Labour government has already scrapped the inhumane Rwanda Plan, begun work on overhauling the planning system to help speed up an ambitious house-building programme of building 1.5m homes over this parliament, and introduced mandatory housing targets for local areas.

Local authorities are still under severe financial pressure, facing a funding gap of nearly £6bn over the next two years and 1 in 5 local authorities in England are at risk of being served Section 114 Notices.

Despite years of underfunding from central government, Haringey Council has achieved and delivered on many key commitments through the Haringey Deal & Corporate Delivery Plan by working with residents to co-produce and co-design a fairer, greener Haringey.

The Council believes that

The Labour government offers a welcome change in direction towards sensible governance, growing our economy, improving the public services residents need most, and supporting and protecting the most vulnerable in society.

We know our local communities and our borough best and welcome the government's plans to devolve further powers so that we can work to deliver for and with local people.

The Labour government faces an uphill challenge in power because of the Conservative government's failed legacy, with public services struggling, demand for services rising and a stagnated economy.

The Labour government's commitment to being fiscally responsible is the right thing to do at this time of economic instability and will ensure any use of public money is used responsibly and is focused on supporting the most vulnerable.

A Labour government and a Labour Mayor of London will help us to deliver our transformative plan for change and help us to continue our progress in making a Haringey a fairer, greener borough.

The Local Growth Plan, the Green Prosperity Plan, the Warmer Homes Plan, Great British Energy, the National Wealth Fund, a New Deal for Working People are welcome commitments that will help to renew our country and will have a sustained and real impact on Haringey residents.

This Council resolves to:

Work collaboratively with our new Labour government and Labour Mayor of London to deliver change for residents in Haringey.

Write to the Prime Minister congratulating him and his government on winning the election and reaffirm our commitment to working with the government to deliver for residents in Haringey.

Write to the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government, congratulating her in her new role, reaffirm our commitment to work collaboratively with her department on issues that impact Haringey, and invite her to visit the borough and discuss our progress in making Haringey a fairer, greener borough.

Write to our four Members of Parliament to congratulate them on their elections and reaffirm our commitment to working with them to deliver for all residents.

Motion B- Proportional representation

Councillor Barnes proposed a motion calling for Proportional Representation to be used for UK general and local elections. She emphasised that Haringey Council should be one of the progressive and democratic Councils supporting proportional representation campaign.

Councillor Barnes highlighted that there was a need for the new government to repair the damage of previous government and that this should include fixing an out-of-date electoral system to better support fairness and democracy.

Councillor Emery seconded the motion and emphasised that PR came with many additional benefits, such as a higher number of people voting in the elections, more engagement in politics and a more representative set of voters.

Councillor Emery highlighted that a previous Labour Party Conference had indicated support for the introduction of proportional representation. He mentioned that this step was needed towards a fairer future where each vote had equal value.

Councillor Weston moved an amendment to the motion. She highlighted that in her recent experience of local campaigning, this issue had not been mentioned by residents and they had been concerned about a range of issues such as being able to access NHS services, how they might pay for care as they get older or that of their relatives, how long they would be able to afford their rent, whether they would be able to feed their families, how they could live on the benefits that they received.

Councillor Ibrahim seconded the amendment to the motion, referring to the queue of people awaiting food packages at the food bank which all Councillors had seen when entering the Town Hall. She mentioned that it was a time of national struggle for residents in Haringey who were finding it difficult to pay their bills. There was a need to fix the problems that were at hand and ensure the function of government was focused on delivering for its residents.

Cllr Brabazon and Cllr O'Donovan spoke in the debate and highlighted the following:

- Reaffirming the focus on rebuilding public services for the benefit of everyone.
- Need for Councillors to work with the government and the London Mayor to improve the lives of citizens, seeking unity amongst all citizens.
- Focus was on providing support for the most vulnerable people, who were no longer able to fund basic items. Noting that there were increased numbers of residents in need of foodbanks.
- Many priorities for the new government, including investment in the NHS, and increasing the number of homes to be built a year, so people in the UK have a place they could live in. There was a need to invest in the public services and communities urgently,

Councillor Barnes responded to the debate and highlighted that the motion requested for the Council to dedicate itself to taking action in supporting the Councils for PR' campaign and highlighted two other Councils that had done this.

Following a vote on the amendment to the Motion, the amendment was AGREED.

Following a vote to the Motion as amended, this was AGREED.

Proposer: Councillor Elin Weston

Seconder: Councillor Emine Ibrahim

Council notes:

- First Past the Post is the established electoral system used in the United Kingdom for general elections;
- The benefits and disadvantages of First Past the Post have been debated widely;
- One of those benefits is the capacity of First Past the Post to deliver clear electoral outcomes, supporting the formation of Governments able to deliver their electoral pledges through Parliament.
- The Liberal Democrats long-term commitment to electoral reform was rejected by voters in a UK-wide referendum on the parliamentary voting system;
- The recent General Election returned a majority Labour government with a credible plan to rebuild the UK after 14 years of austerity implemented by Conservative and Conservative-Liberal Democrat governments;
- While the Labour Party conference in 2022 voted in favour of introducing Proportional Representation, the new Labour Government's priority should be repairing the damage of the past 14 years, implementing its legislative agenda and rebuilding our country in the interests of those who are most in need.

Council believes that:

- The urgency of the challenge to rebuild our public services and our country by delivering its electoral pledges should be the focus of the Labour Government;
- This focus should not be diminished by a diversion of resources towards changing the voting system;
- The English Devolution Bill announced in the King's Speech has the potential to enhance decision-making by mayors, combined authorities and local authorities, and deliver change for the communities they represent and serve;
- Working with the Labour Government to deliver this Bill and their legislative programme for change is a better use of Council resources and will be of greater benefit to Haringey residents.

Council resolves to:

- Support the development of proposals for greater devolution within England;
- Write to the Secretary of State for Housing, Communities and Local Government outlining the Council's support for the principle of the Bill and committing to engaging with any consultation processes as the English Devolution Bill progresses.

CHAIR:

Signed by Chair

Date

MINUTES OF THE MEETING Full Council HELD ON Thursday, 10th October, 2024, 18:30 – 20:15pm

PRESENT:

Councillors: Anna Abela, Peray Ahmet, Ibrahim Ali, Emily Arkell, Nicola Bartlett, John Bevan, Barbara Blake, Mark Blake, Zena Brabazon, Cathy Brennan, Lester Buxton, Dana Carlin, Luke Cawley-Harrison, Seema Chandwani, Lotte Collett, Pippa Connor, Eldrige Culverwell, Nick da Costa, Lucia das Neves, Isidoros Diakides, Sarah Elliott, Ruth Gordon, Mark Grosskopf, Makbule Gunes, Mike Hakata, Emine Ibrahim, Marsha Isilar-Gosling, Thayahlan Iyngkaran, Sue Jameson(Mayor), Cressida Johnson, Anna Lawton, Ahmed Mahbub, Mary Mason, Khaled Moyeed, Sean O'Donovan, Ajda Ovat, Michelle Simmons-Safo, Joy Wallace, Elin Weston, Matt White and Sarah Williams

1. FILMING AT MEETINGS

The Mayor referred to the filming at notice of meetings and attendees noted that the meeting was only being recorded.

2. TO RECEIVE APOLOGIES FOR ABSENCE

There were apologies for absence from:

Cllr Rice
Cllr Adamou
Cllr Emery
Cllr Barnes
Cllr Rossetti
Cllr Dunstall
Cllr Dogan
Cllr Amin,
Cllr Opoku
Cllr Peacock
Cllr Worrell
Cllr Hymas

There were apologies for lateness from Councillor Mahbub and Cllr Mark Blake.

3. CSO 3.1 VI - WELCOME FROM THE MAYOR

The Mayor opened the meeting and welcomed members of Elevated Youth, the Haringey Youth Panel and representatives of Aspire, which is the group that puts forward the voice of Haringey's young people and children in care.

It was noted that this meeting was the first time that there was active participation and collaboration between elected members and young people at a formal Council meeting.

This meeting was a good opportunity for young people to make a difference to themselves and their communities.

This meeting coincided with Local Democracy week-an initiative that highlighted the impact that resident participation can have on community life.

The Mayor highlighted that under19s of Haringey made up approximately 21% of the total population and decisions the Council make will have a lasting impact on these young people. Young people were an integral part of shaping the future of local democracy.

The Mayor hoped the Council would continue to engage young people in a meaningful and transparent way.

The Mayor advised that it was also World Mental Health Day and also an opportunity to raise awareness of mental health issues. She had took part in the unveiling of the bench at Tottenham sports and community centre dedicated to Caroline Flack who killed herself and the family suffered this loss very publicly. On the bench there were QR codes to access Mind and other websites for advice.

The Mayor called on the Chief Whip who MOVED in accordance with Council Standing Order 25.1, to suspend Council Standing Orders: 4.4 11, 15.1 at this extraordinary Full Council to allow speeches/ presentations from the Haringey Youth Council on the key concerns of young people living in the borough.

This was seconded by Cllr Cawley – Harrison and AGREED.

4. CSO 3.1 VI - INTRODUCTION FROM THE LEADER

The Leader of the Council welcomed the young people in attendance and briefly outlined the purpose of the meeting. The Leader highlighted that the creation of a Youth Council was a commitment made during local elections, and while progress had been made, this was only the beginning of the process. She emphasised that the goal was not to simply to 'tick a box', but to ensure that every voice, especially those of young people in the community, was heard. The Youth Council was not just a one-time event but also an ongoing opportunity to engage in meaningful dialogue.

The Leader of the Council expressed a strong desire for diverse opinions, acknowledging that challenges and differing viewpoints were essential to making better decisions and becoming better leaders. The Leader of the Council encouraged young people to be active participants in the decision-making process, noting that they

were welcome to observe Cabinet meetings and spend time at the Council to understand the workings of local government, including its limitations and the need for collaboration.

The importance of regeneration and place making was highlighted as an issue close to the Leader of the Council's heart as someone who grew up in the borough. The Leader of the Council stressed the need to balance growth with maintaining the community's soul, and to work together with others to shape the future of the area. The Youth Council was key to keeping young people engaged in these ongoing discussions and providing them with the tools to influence change.

In conclusion, the Leader of the Council expressed hope that the Youth Council would be an ongoing, dynamic journey for all involved.

The Mayor called the following young people to make their speeches.

Yasin:

Yasin, a 17-year-old from White Hart Lane and Wood Green, spoke about the impact of place making on cultural identity in Haringey. He highlighted how rising costs are displacing minority communities and eroding cultural spaces, using the example of an Asian restaurant once supported by his late grandmother that is struggling due to affordability issues. Yasin emphasised the importance of preserving cultural heritage, particularly for young people, and called for more inclusion of youth in place making efforts.

He urged Councillors to engage directly with young people by spending time in schools, youth hubs, and libraries to better understand their challenges. He also criticized stereotypes of young people and called for them to be valued and involved in community development.

Yasin posed three questions to the Cabinet:

1. How will the Council implement changes for the Borough of Culture 2027?
2. How will the Council support existing subcultures in Haringay without overshadowing them?
3. How can young people be encouraged to engage in place making while preserving Haringey's cultural identity?

In conclusion, Yasin called for a balanced approach to place making that revitalises the area while protecting cultural spaces and identities, ensuring young people can thrive and contribute to their community.

Steven:

Steven, a care-experienced resident of Haringey and Participation and Engagement Worker at the Council for children in care and care leavers, spoke about the challenges young people face during their transition to adulthood, particularly those in

care or with additional needs like autism and ADHD. He highlighted the issue of long waiting times for assessments, which delay essential support and risk leaving young people without the services they need.

Steven called on the Council to prioritise these transitions, ensuring timely access to housing and social care services based on individual needs, not just eligibility thresholds. He emphasised that young people's needs do not disappear at 18, and continuous support was essential. In conclusion, Steven urged the Council to take immediate action to improve transitional support for vulnerable young people.

Cindy:

Cindy, a 16-year-old, spoke about the critical issue of funding cuts to youth services and the impact it could have on young people. She shared her personal experience, expressing how the Rising Green Youth Hub, along with the Bruce Grove Youth Club, had been essential to her growth. These Youth Hubs had provided her with valuable opportunities, life skills, and support, helping her build confidence and prepare for adulthood. However, Cindy also highlighted the troubling trend of youth workers leaving due to low pay, which threatened the continuity and quality of services.

She stressed that youth hubs were not just recreational spaces, but vital for personal development, offering life skills such as cooking, business planning, and creative outlets like music and design. They also provided a safe environment to help keep young people off the streets. However, Cindy noted that not every area has access to such hubs, and without proper funding, many of these services could disappear, leaving young people without support and positive role models.

Cindy asked the Council what plans they have for improving youth services and retaining youth workers. She emphasised that these hubs were crucial in giving young people a voice, as they had encouraged her to speak out today. She concluded by inviting Councillors to visit youth panel meetings to further discuss the importance of these spaces and work towards a future where every young person has the same opportunities to grow and learn.

Naveah:

Naveah, a 16-year-old, spoke about the rising concerning issue of knife crime among young people, particularly in the UK. She highlighted the alarming 15% increase in knife crime over the past year, which was not just a statistic but a tragedy that affected real lives, resulting in loss, trauma, and changed futures.

She painted a vivid picture of the pressures faced by young people, citing the example of a six-year-old boy feeling the overwhelming urge to fit in when he saw friends carrying knives. She questioned how many people could remember a moment when they, too, felt pressured to take a risk to belong.

It was stressed that the problem was not only the increase in knife crime but also its increased severity, with over 2,000 young people becoming victims of knife-related

incidents last year, many suffering life-changing injuries. Each statistic, she pointed out, represented a young life disrupted, potential wasted, and dreams shattered.

She recalled a personal experience where, just before her birthday, police stopped her group of friends after a young boy was attacked in broad daylight and the impact this had on her and her friends. Naveah posed the question: "How would you feel if this happened to your child?".

She concluded by calling for urgent action to address peer pressure and the factors contributing to youth involvement in knife crime, urging society not to accept this as the new normal and to take steps to protect young people's safety and future.

Danielle:

Danielle, a 15-year-old student in her final year of secondary school, spoke about the mental health challenges faced by young people in Haringey. She highlighted the alarming statistic that suicide was the leading cause of death among children and young people, with contributing factors such as poor mental health, academic pressure, bullying, social isolation, and family issues. Danielle questioned how the next generation would develop if these mental health issues continued to be ignored.

Speaking from her own experience, Danielle shared the intense pressure of GCSEs, which included constant revision, coursework, and applications for colleges. She expressed concern that there was little focus on mental health in the school curriculum and asked where the balance was between academic expectations and well-being. Danielle suggested that mindfulness and coping techniques should be taught from a young age, proposing that even 10 minutes a day could help young people manage stress and pressures.

Danielle also discussed safety concerns, mentioning how alarming it could be to walk home at night or encounter dark, unsafe spaces. She proposed that the Council invest in better lighting in areas like Chestnut Park to help young people feel safer and reduce crime and anti-social behaviour.

While acknowledging that the Council may not be directly responsible for mental health services, Danielle urged them to address other issues that contribute to the well-being of young people, such as providing affordable housing, improving access to services, and creating spaces that encourage social interaction and community building.

In conclusion, Danielle raised two key questions:

1. How does the Council plan to improve mental health services and the education system to better support young people?
2. What is being done to reduce the feeling of being unsupported among young people and their families?

She emphasised the importance of addressing these issues to help young people thrive in a healthier, safer environment.

Ruth:

Ruth, a 17-year-old from Haringey, addressed two key issues affecting young people in the borough: the lack of work experience opportunities for students and the need for affordable housing for young adults.

1. Work Experience Opportunities:

Ruth shared a personal experience of feeling unprepared for her future career. During her time in secondary school, she had limited interaction with her careers advisor and received no formal work experience to help her explore potential career paths. She emphasised that many young people in Haringey faced the same challenges, often being pressured to make life-altering decisions without adequate exposure to career options. Ruth proposed that the Council create an incentive program aimed at 15-19-year-olds, collaborating with companies across London to offer diverse work experience opportunities. She also suggested establishing a dedicated work experience sector within the Council, with regular workshops and clear communication between schools and employers to help students make more informed decisions about their futures.

2. Affordable Housing for Young Adults:

Ruth also highlighted the struggles young adults in Haringey face when it comes to affordable housing. While many young people, especially university graduates, wanted to remain in the borough, the high cost of living made it difficult to live independently. Ruth outlined the financial challenges of renting in Haringey, citing her own situation as an example: a recent graduate with significant student debt who can barely afford rent with a starting salary. She proposed a "young rental scheme" that would provide financial assistance to young people who seek to live independently in the borough, allowing them to thrive in Haringey's newly regenerated areas. Ruth praised the Council's efforts to build affordable housing for families and suggested that similar support could be extended to young adults.

In conclusion, Ruth queried how the Council plans to implement these suggestions and improve support for young people, particularly in terms of providing better career guidance and affordable housing options.

Zak:

Zak, a 24-year-old, shared that he had left an abusive household and found himself homeless. After seeking advice in Haringey, he was told to go to the police station for help. Zak spent the night there, from 11:30 PM until 7:30 AM, with no money, just a bag. The station was filled with addicts and drunk individuals, which made him feel scared and vulnerable.

Although many people suggested he return home, Zak was determined to escape the abusive situation. When he sought help, he faced barriers. Local organisations in Haringey, where he had lived his entire life, told him to go back home, leaving Zak feeling humiliated and discouraged.

Eventually, Zak was moved to Ilford, a transition that proved overwhelming. The long commutes the distance from everything familiar, and the challenge of balancing work left him physically and emotionally drained. Despite these struggles, Zak currently lives in Barnet and feels incredibly grateful for the support he had received from mentors and others along the way.

Zak's queried what support is available for young adults with additional needs, and how can the transition to stable housing be made easier. He believed the current system was unfair and needed to be improved to better support people in situations like his.

Selina:

Selina, a 13-year-old student at Alexandra Park School, was speaking out for better support for students with Special Educational Needs (SEN) in mainstream schools. As a young person with autism and dyspraxia, she had faced challenges in her education due to insufficient funding. Currently, funding for SEN students was capped at £10,000 per student, but the actual cost of support, such as Assistant Teachers, exceeded that amount. This created a significant funding gap, leaving schools struggling to provide adequate help.

Since the introduction of Education, Health, and Care Plans (EHCPs) in 2014, the number of SEN students had risen significantly, but funding had not kept up. At her own school, Selina lacked essential services like sensory rooms and one-to-one occupational therapy, which were crucial for managing sensory overloads and improving functional skills. She had also spoken to other SEN students, who shared similar frustrations, wanting more support in lessons, better technology, and more extracurricular opportunities.

A recent article highlighted that local Councils were facing a £1.9 billion deficit in SEN funding, which was expected to grow unless action was taken. Selina was calling for the government to address this funding crisis and ensure that students with SEN received the support they needed. She also wanted to raise awareness about neurodiversity and promote greater social inclusion for all students.

In conclusion, Selina expressed her gratitude for the opportunity to speak and hoped her message would inspire the changes needed to support students like her.

Zachary:

Zachary, a 12-year-old student, spoke about the lack of indoor sports facilities in his community and how it affected young people. While there are some outdoor options like ice skating, roller skating, and running tracks, he pointed out that the lack of

indoor facilities meant young people missed out on year-round opportunities to stay active and engaged.

He emphasised that more indoor sports facilities would provide a wider variety of activities, which could help young people find their passion and stay healthy. Beyond physical benefits, sports teach valuable life skills like teamwork, discipline, and stress management. Zachary shared that many of his friends are stuck at home, often playing video games, especially during winter when outdoor sports are less accessible. He highlighted how boredom and a lack of activities can lead to a negative path.

Zachary believed that investing in indoor sports facilities could make a huge difference, offering young people a positive outlet and a sense of community. He stressed that sports are not just games but opportunities for young people to feel included, build confidence, and develop a sense of purpose. He called on the Council to invest in activities that keep young people off the streets and provide them with opportunities to grow and be proud of themselves.

Zachary's key question to the Council was how they plan to increase sporting activities to reduce antisocial behaviour and improve youth engagement. He urged the Council to consider a broader range of sports programs that would benefit young people and help them thrive. In conclusion, he thanked the Council and expressed hope that they would work together to create a better, more supportive environment for the next generation.

Kayan:

Kayan, a 17-year-old from Tottenham, spoke passionately about the issue of knife crime, which had become a growing concern in his community. He explained how the rise in knife crime had created a climate of fear, loss, and insecurity, impacting not only the victims but also their families. Kayan shared how he had personally seen friends affected by knife crime, with some even falling victim to it themselves. He emphasised that this cycle of violence was trapping young people, making them feel that violence is the only means of protection.

Kayan believed that the root cause of knife crime was due to the lack of opportunity and support for young people. When young people felt disconnected, hopeless, or unable to see a positive future, they were more likely to fall into negative influences. He stressed that it is crucial to address these underlying issues, rather than simply focusing on the crime itself.

Acknowledging the efforts already being made by the government and local Councils, such as youth clubs and programs like Bruce Grove, Rising Green, Kayan noted that these initiatives had been vital to his personal development. However, he emphasised that more needed to be done. There was a pressing need for more accessible support and safe spaces where young people could be heard, understood, and given the chance to feel valued and hopeful about their future.

In his message to the Council, Kayan urged decision-makers to prioritise investment in youth programs and community support to break the cycle of violence. He believed that when young people feel safe and supported, they were more likely to stay away from negative influences.

Kayan concluded by asking the Council: *"What are you going to do to prevent knife crime?"*.

The Mayor - called on the Leader and Cabinet Members to respond to the issues raised in the speeches and questions raised. The following was noted:

Cllr Arkell responded that the Culture Strategy was going to Cabinet very soon. It would be guided by six underlying principles of access, collaboration, equity, growth, life-long learning and visibility and representation. She added her support for Yasin's aspiration for Haringey to be a place where all young people can thrive and prosper in a supportive and creative environment. She also welcomed his invitation to meet and noted that the Assistant Directors for Culture & Creativity would be in contact to talk further.

How do you plan to support existing subcultures without overshadowing them with place making?

Cllr Gordon responded that the aim of place making is to empower all residents, to have real influence over changes to their local area. She wanted to celebrate the rich heritage of diverse communities and help local businesses to thrive. She added that Rising Green, the Youth Hub in Wood Green was co-designed with architects and by young people. She commented that the more the Council reached out to seldom heard voices - the better equipped they were to create spaces for them. Wood Green and Tottenham Voices was an example of this.

How can we get the next generation interested in place making?

Cllr Gordon responded that a good example of how to get people interested in place making was the Photography Project that was created with young people. The project asked young people to photograph themselves in their favourite place in Wood Green. A professional photographer, who took them through the techniques used to photograph and curate the project, supported the young people and team. The results were pulled together in an exhibition as part of the launch of Shaping Wood Green and were featured as part of the London Festival of Architecture. Cllr Gordon said that she felt that it was projects such as this that really allowed young people to feel genuinely part of the finished strategy. It also provided the Council's strategies with a genuine legitimacy.

Yasin had a follow up question and asked what plans there were to involve young people. Cllr Gordon responded that she and her team would be in touch to talk further about how young people and her team could work together. She added that some

work streams would address some of the issues raised. In addition, there were some longer-term plans in motion where themes had been identified for areas of development.

Children Looked After and Care Leavers Transitions for all young people into adulthood. How do they plan to improve the services on transitional safeguarding?

Cllr Brabazon responded to the question by stating that her team had just set up a new service to deal with all aspects of transition from youth services to adult services and this covered those with SEND. This would be up and running in the new financial year. She acknowledged that people change as they move through the system and that ambitions change. In response to this, the team were starting earlier to plan with service users and families. She advised that this service would support all young people to have the best opportunities. She wanted to ensure that no one fell through the gaps and that it was an adaptive and joined up service. In relation to supporting care leavers, the Leaving Care Team helped young people with becoming independent, but this crossed many other services such as housing and employment. She wanted to ensure that there was a multi-agency approach, with strong links and good relationships. In addition, that young people that were identified with a continuing need, even though they may not meet a threshold.

Cllr Das Neves also responded that she supported and empathised with Steven about the impact that the transition from Children's Services to Adult's Services can have on a young person. She also highlighted that transition forms an important part of adult safeguarding work. She stated that there was no reason why young people could not be invited to talk about their own experiences and talk to practitioners. She outlined that successful transition involved planning with families and young people at an early stage. Stephen thanked the Cabinet and welcomed the idea of working together.

Social activities for Young People with SEND and SEND Funding.

Cllr Brabazon updated Selina's figures that schools were capped at £10,000 for SEND pupils. She clarified that this was place funding, and they would then receive £23,280 as a top up from the LA. She also stated that there had been a lot of work to ensure that funding was equitable and supported children wherever they chose to learn.

She agreed with Selina that there should be more SEND social activities for young people. She suggested that those points should also be raised with the school and offered to talk to Selina's Head teacher about it. She commented that Selina had pointed out some very profound issues facing young people with SEND, and she thought the 'Elevated Youth' club was a starting point for young people with SEND to begin to address the issues stated.

Cllr Arkell responded that she fully supported Zak's statement. She added that only 47% of children and young people meet the Chief Medical Officers' current guidelines of taking part in 60 minutes or more of physical activity or sport per week. She listed

some Council provisions like indoor tennis at the New River Sports Centre and the active school holiday programme. She also stated that the tennis courts across the borough had recently been refurbished. The Council had also taken on the management of leisure centres. The Council were now reviewing the programming, and the team would welcome input from young people about what services they would like to see in leisure centres and in parks and green spaces.

*Work Experience for University Graduates and Key stage 4 & 5 – career support.
Housing/ Affordable rent prices for University Graduates and what is the future for the secondary school leavers to make more informed career choices?*

Cllr Williams responded that all people across the borough were having to cope with rental increases and high rents. She added that in response to this the Council were building Council homes however, this was expensive and difficult. She emphasised that there were limitations for the Council. She explained that private landlords can and do double their rates and this prices out their current tenants. Situations like these meant that many people could not afford to rent or to buy. She stated that families were living in very overcrowded circumstances; however, Haringey's Landlord Licensing scheme ensured that the accommodation was up to standard. She stated that the Council was working with the Labour government to do more and to commit to rent controls, so that rents in local boroughs were based on what people can earn. She also stated that she thought that many more houses need to be built.

Cllr Gordon then responded to Ruth's question regarding career opportunities at secondary school and university. Cllr Gordon indicated that the responsibility for work experience opportunities lay with schools. However, the Council had set up opportunities that ran alongside this. These included Haringey Works which had helped 400 local young people last year into employment. There was a youth zone for employment support, as well as an early help support offer with employment for post 16s. In-house training and apprenticeships are available with Haringey Council. There were also provisions in the overall strategy that tried to ensure that employers were offering London living wage as opposed to just a minimum wage.

Question 1. How do you plan to improve the mental health services and the education system in the community?

Question 2. What is being put in place to decrease the feeling of not being supported?

Cllr Das Neves talked through the mental health offer for Haringey. She highlighted Haringey's involvement in the London-wide Mental Health Day, partnership work with other organisations and KOOTH, an online mental health resource for young people. She emphasised that this was a useful time for young people to give input, and channel these opinions upwards. This could also help the Council look at how they could work more with partnerships and other local organisations. She added that her

team had agreed to bring a group of the Youth Council together with Cllr O'Donovan (the Mental Health Champion) to talk more about this.

What are the plans for the Council to improve the bureaucracy for young people dealing with housing issues as my experience was very traumatic?

Cllr Williams apologised for Zac's experience. She pledged to look harder at the bureaucracy that goes with this. She added that her team was looking into providing a 'walk-in' service and was hoping to get it open by the start of next year. Cllr Williams felt it was unacceptable that the out of hour's service had told him to go to a police station for shelter at a traumatic time. Cllr Williams offered Zac the opportunity to talk through his experience with the team in a separate meeting.

What is Haringey Council's plan to ensure that adequate funding is available for local Youth Hubs to ensure that YP staying off the streets?

Are there any plans for more youth hubs to be opened? To cover areas near Tottenham Hale, Haringey ladder, St Ann's and Hornsey

Cllr Brabazon responded that these were tough financial times, and the Council was waiting to hear if there was going to be any funding from central government. However, she stated that there were three youth hubs in Haringey all offering universal services, open access and inclusive provision. She outlined that Haringey had a mobile youth hub, as well as targeted youth work and outreach work. The team was also working alongside partners in the voluntary sector, including work with the Tottenham Hotspur Foundation to develop more youth provision in the borough next year. She stated that the team would also be launching a new Youth Strategy, which will set out priorities for the next five years from 2025.

Cindy asked how a new generation of youth workers were going to be developed by the Council.

Cllr Brabazon responded that she thought youth workers should be developed in house. She suggested that young people that use the services could become volunteers and then eventually trainees. She emphasised that this was important to 'grow our own' youth workers to reflect the diversity in the borough.

Knife crime and gang violence.

What is being done to prevent knife crime?

Cllr Ovat responded that Haringey had been working in partnership with organisations to address knife crime and identify young people at risk of violence and anti-social behaviour. These partnerships would give opportunities for young people to have a constructive outlet and a pathway to success. She agreed with Kayan that the team had to look at the root causes and use prevention techniques to prevent violence. She

cited that Haringey was working with the police to help reduce violence in the north area. The Councils were also working with schools to ensure that young people were engaged. She emphasised her commitment to work with young people to co design interventions. She offered to meet with both Kayan and Naveah to discuss more.

Failure of the education system to support young people with autism, ADHD, dyslexia and Down Syndrome.

Cllr Brabazon responded that there had been some successes with education provision with SEND. However, the key issue was that there was not enough money in the system. She stated that she hoped that the government would write off the debts; however, in the meantime schools were working in a system where there was not enough provision. The Council had no power to give schools more money and some of the relationships with the schools were hard to administer, so working together was key. She stated that young people had done very well in national tests, but she did agree that there was more to be done, and they were working towards an inclusive and high achieving system.

5. TO CONSIDER THE FOLLOWING MOTIONS IN ACCORDANCE WITH COUNCIL RULES OF PROCEDURE NO. 13

Cllr Brabazon proposed a cross-party motion welcoming the Youth Council and youth empowerment and involvement in local democracy. Cllr Brabazon stressed that it was significantly harder for this generation of young people than it was for other generations who had enjoyed a debt-free education.

Cllr Brabazon emphasised that the Youth Council's concerns had been heard. She was delighted to be asked challenging questions and hear directly from service users. In Children's Services they were working hard to extend youth participation and incorporate it in the regular way that the Council does business. She shared some of the work of Children's services. The Youth Council had been set up, Cllr Buxton was Haringey's Youth Champion and Cllr Brabazon would now be meeting with the Youth Council on a regular basis. The motion would propose that Councillors extend engagement with young people throughout the year. She stated that Elevated Youth had been evolving and had a seat on the SEND Executive Board where special needs policy was shaped. ASPIRE the voice for 'looked after' children had now over 50 members. She thanked Steven Agyeman for the work he had done on this. The Corporate Parenting Committee met on a regular basis with ASPIRE to get feedback on what was working in the services. She stated that young people sit on many panels in Children's services, including recruitment.

Cllr Brabazon concluded by expressing that democracy was fragile and that it needed sustaining. She called on members to take seriously the responsibility of engaging young people in the democratic process.

In accordance with Council's standing orders, 15.3 Councillor Isilar-Gosling seconded the motion.

Cllr Isilar-Gosling commented on the eloquence of the Youth Council. She was pleased that the Youth Council was up and running and looked forward to working with them in the future. She stressed that on certain topics it was important for Councillors to recognise that they did not have all the answers, and it was important to talk to those who were directly affected. She extended her thanks to all at the Youth Council.

Cllr Mark Blake thanked the Youth Council and all officers involved for the opportunity to hear their views. He stated that politics was about improving people's lives and he believed in fairness, equality, a better world, and investing in the community. He emphasised that things were harder for young people than they ever had been. He gave the example of an expensive university education and unaffordable housing. He challenged all those on the Youth Council to find their politics and make a difference.

Cllr Buxton outlined that no Councillor could truly say they represented the voice of young people in Haringey. He expressed that this was the first step for young people to hold decision makers to account, and he had high ambitions for the Youth Council. His role as Youth Champion was to ensure that young people were truly empowered and all voices were heard.

Cllr Brabazon's closing remarks were to thank the Youth Council.

Following a vote on Motion D, The Council's Launch of the Haringey Youth Council, it was unanimously AGREED.

Proposer: Cllr Zena Brabazon

Second: Cllr Cawley- Harrison

The Council notes that

- The last census the Council undertook indicated that there were over 59,000 under 19s in the Borough- out of an overall population of 261,000. This represents a significant proportion of Haringey's population.
- The Corporate Delivery Plan 2024– 2026 set out plans to establish a Haringey Youth Council. This was to ensure that young people representing their communities would have more opportunities to be actively involved in influencing decisions that affect them.
- Since 2022, The Council's Youth Services team has undertaken work with schools, youth groups and established youth forums to recruit young people to an initial Youth Panel event. This took place in July 2024 and was attended by ten of the twelve young people who have since been recruited. In addition to this, there are now fifteen young people who are members of the Elevated Youth SEND Forum. Close ties are being developed between the two forums.
- The Council is developing a vision for a corporate response to engaging young people in the decision-making processes of the Council.
- The Council must support young people to develop the skills to make this a successful and meaningful project.

The Council believes that

- Young residents who represent their community must be heard by the Council especially when it comes to decisions that directly affect them now and in the future.
- Closer ties must be formed between Elected Representatives and The Youth Council.

This Council resolves to:

- Do its utmost to ensure that Haringey has a diverse Youth Council that represents the young people of the borough.
- Continue recruiting to and developing the skills of the Youth Council to ensure that the voices of young people in the community are being heard at every level.
- Commit to support Councillors to engage with the Youth Council on a regular basis. This will culminate in an annual Council-wide meeting with the Youth Council to hear concerns and issues directly affecting young people.
- Continue working with schools, youth groups and forums to ensure youth participation in its' decision making.

6. APPROVAL OF THE HARINGEY YOUTH JUSTICE PLAN 2024- 2027

Cllr Brabazon, Cabinet Member for Children, Schools and Families MOVED that the report which sought approval of Adoption of the Annual Youth Justice Plan 2024 – 2027 be adopted, and it was,

RESOLVED

To adopt the Annual Youth Justice Plan 2024-2027 attached at Appendix 2.

The Mayor thanked young people for attending and their fantastic contributions There was a closing song from Kiki and Council wide round of applause.

CHAIR:

Signed by Chair

Date

This page is intentionally left blank

Report for: Full Council 18 November 2024

Title: Appointment of Honorary Recorder of Haringey

Report authorised by : Fiona Alderman, Assistant Director of Legal and Governance

Lead Officer: Ayshe Simsek, Democratic Services & Scrutiny Manager
Ayshe.simsek@haringey.gov.uk, 020 8489 2929

Ward(s) affected: N/A

**Report for Key/
Non-Key Decision:** N/A

1. Describe the issue under consideration.

- 1.1 Having a strong relationship between the judiciary and local partners, including the local authority is recognised as an effective way of supporting community safety and community relations. It is for this reason that the Lord Chief Justice recommends that effective relationships between the judiciary and civic institutions are a good way of establishing a means of communications to support, safer and stronger local communities. One means of recognising that such a relationship exists is through the appointment of an Honorary Recorder for the Borough.
- 1.2 Judge Noel Lucas was appointed by the Council in July 2021 as the Council's first Honorary recorder. His 8 year term as a Resident Judge (RJ) at Wood Green Crown Court came to end in December 2023.
- 1.3 The Council places on record it's thanks to Judge Noel Lucas. The expansion of the court from a 10-court centre to a 16-court centre and the significant improvement in the performance of Wood Green Crown Court over the past 8 years has resulted in the Resident Judge role being elevated to a Senior Circuit Judge role and means Wood Green Crown Court is now one of the more senior Crown Courts in both London and in the UK.
- 1.4 It is proposed to appoint his Honor Judge John Dodd KC as the Honorary Recorder and continue partnership with Wood Green Crown Court and the judiciary. Judge John Dodd KC was called to the Bar (Gray's Inn) in 1979 and took Silk in 2006. He was appointed as a recorder in 2000 and as a circuit judge in 2012. The Lady Chief Justice of England and Wales, the Right Honourable the Baroness Carr of Walton-on-the-Hill has appointed His Honour Judge Dodd KC to be a Senior Circuit Judge, Resident Judge based at Wood Green Crown Court, with effect from 10 June 2024.

- 1.5 Wood Green Crown Court is a prominent part of the Borough and deals with many high-profile criminal cases, delivering justice in London and beyond as well as many more local cases.
- 1.6 The appointee to the role of Honorary Recorder must be a serving circuit judge or recorder and it is proposed that his Honor Judge John Dodd KC be appointed to the position.
- 1.7 The Council was pleased to receive the nomination from the Royal Courts of Justice to make this appointment and maintaining this vital connection with Wood Green Crown Court.
- 1.8 In accordance with The Lord Chief Justice's guidelines, the Chief Executive further consulted the Senior Presiding Judge for England and Wales, who endorsed the appointment of Judge John Dodds KC as Honorary Recorder for Haringey.

2. Cabinet Member Introduction

N/A

3. Recommendations

- 3.1 To agree, that pursuant to Section 54 of the Courts Act 1971, His Honour, Judge John Dodd KC, be appointed to the office of Honorary Recorder of Haringey during his tenure as Resident circuit judge.

4. Reasons for decision

- 4.1 As set out in paragraph 1.1 to establish links between the judiciary and civil life and support safer and stronger communities.

5. Alternative options considered.

None

6. Background information

- 6.1 At each Crown Court centre a particular judge is appointed "Resident Judge" and leads the team of judges who sit there and provides the essential link between the judiciary and the administration.
- 6.2 Judge John Dodd KC is an experienced Judge and recently managed a number of high-profile local cases.
- 6.3 Since the implementation of the Courts Act 1971 and the establishment of the Crown Court for England and Wales, Councils with Crown Courts have had the power to appoint resident judges as Honorary Recorder of their borough.

- 6.4 Historically, the Recorder of a town or city was a legal representative charged with the duties of dispensing justice at the Court. Currently, the role of Honorary Recorder is a purely civic and ceremonial one which carries no formal duties or powers. It is intended to further the link between a Council and the criminal courts, through involving the senior sitting judge in civic affairs and ceremonial events. In practice, this would see the Honorary Recorder attend civic events such as the Annual Council meeting and Remembrance Services.
- 6.5 According to the Lord Chief Justice's Guidelines for the Appointment of Honorary Recorders, it has been the practice of most large city Councils to appoint the Resident Judge to be Honorary Recorder of the city during their tenure of office.
- 6.6 As head of the Judiciary, following the Constitutional Reform Act 2005, the Lord Chief Justice was keen to encourage those city and borough councils which have not made such appointments to consider doing so.
- 6.7 The guidelines also state that the involvement of the boroughs' Senior Resident Judge in civic affairs and events have been found to be valuable and are generally enjoyed and appreciated on both sides.
- 6.8 In accordance with the 1971 Act such an appointment is made to an individual so in the case of appointing Judge Dodds it would last for the period he is in office.

7. Statutory Officers comments

Finance

- 7.1 There are no specific financial implications arising from the report as there are no defined tasks undertaken by the Honorary Recorder on behalf of the Council. Any costs associated with the Honorary Recorder would need to be met from existing budgetary provisions.

Legal

- 7.2 These are set out within the report. Section 54 of the Courts Act 1971 provides that "the Council of a borough shall have power to appoint a person to be honorary recorder of the borough. Any person appointed must be a circuit judge or recorder.

8. Use of Appendices

None

9. Local Government (Access to Information) Act 1985

The Lord Chief Justice's guidelines for the appointment of Honorary Recorders

This page is intentionally left blank

REPORT OF THE CABINET No. 1, 2024/25**FULL COUNCIL 18 November 2024**

Chair: Councillor Peray Ahmet

Deputy Chair: Councillor Sarah Williams

1. INTRODUCTION**Borough Vision**

This report sets out Haringey's new Borough Vision which shall operate between 2024-2035. This vision has been developed in consultation with partners, residents, and council staff. This report seeks agreement to adopt the vision before publication.

The Borough Vision outlines an ambition to make Haringey a place where we can all belong and thrive. It identifies the key areas for action over the next decade with the idea of achieving this ambition through collaborative partnership action. The vision does not set out specific action plans but a strategic direction for the borough.

Once adopted, it is proposed that work to deliver the vision is led through partnership groups for each Call to Action. These may be existing groups, where they exist, or new groups formed specifically for the purpose.

2. Background

The Leader of the Council introduced the report to Cabinet on the 15th of October and highlighted the following.

- The vision built on the work already done on the Haringey Deal, which sets out the Council's way of working and commitment to designing Council services and developing a different relationship with residents, and the Corporate Delivery Plan that sets out the Councils' delivery ambitions over a 4-year period.
- The vision responds to the recommendation from the Local Government Association's Corporate Peer Challenge in May 2023 for a longer-term vision for the decade ahead.
- The vision sets out a framework to maximise links with partners and stakeholders to build coalitions that help with the delivery of local priorities. It also embeds leadership of the equality, diversity, and Inclusion agenda.

The Leader of the Council concluded, that based on the engagement undertaken to create the vision, the attached document recognises the strengths of the borough and what feels authentically Haringey. It sets out a longer-term ambition where the Council works together with partners and residents to deliver towards 'A place where we can all belong and thrive'.

In the discussion of this report, the following information was shared:

- The Corporate Delivery Plan was at its second iteration and was an action plan and the emphasis of the administration had been about taking actions and were already 'doing' the actions of the vision and had a strong delivery model in the Corporate Plan to enable this.
- Partners and stakeholders had been involved in workshops and the Council worked with partners to ensure that they were able to input to the vision and this had taken longer to set up because the priority had been giving a full opportunity for a wide engagement exercise.
- The consultation on the vision also drew on existing engagements taking place on key Council strategies that were being undertaken in the same period.
- There would be use of existing governance arrangements such as forums and established partnership groups to progress the objectives and if these did not match the aimed for objective then there would be changes or creation of an engagement channel to meet this need.
- The workshops had been attended by 48 different organisations and consultation had included staff as well. However, if there were gaps identified in the engagement planning outlined, the Cabinet was happy to receive feedback on this.

3.RECOMMENDATIONS

Full Council is recommended:

To approve the attached Borough Vision

Report for: The Cabinet, 15 October, 2024

Title: Borough Vision, 2025-2035

Report authorised by: Andy Donald, Chief Executive

Lead Officer: Jess Crowe, Director- Culture, Strategy & Engagement

Ward(s) affected: All

Report for Key/ Non-Key Decision: Key Decision

1. Describe the issue under consideration

- 1.1 This report sets out Haringey's new Borough Vision which shall operate between 2024-2035. This vision has been developed in consultation with partners, residents, and council staff. This report seeks agreement to adopt the vision before publication.
- 1.2 The Borough Vision outlines an ambition to make Haringey a place where we can all belong and thrive. It identifies the key areas for action over the next decade with the idea of achieving this ambition through collaborative partnership action. The vision does not set out specific action plans but a strategic direction for the borough.
- 1.3 Once adopted, it is proposed that work to deliver the vision is led through partnership groups for each Call to Action. These may be existing groups, where they exist, or new groups formed specifically for the purpose.

2. Cabinet Member Introduction

2.1 This Vision builds on the work already done on the Haringey Deal which sets out our way of working and our commitment to designing council services and developing a different relationship with residents, and the Corporate Delivery Plan that sets out the councils' delivery ambitions over a 4-year period.

2.2 This vision responds to the recommendation from the Local Government Association's Corporate Peer Challenge in May 2023 for a longer-term vision for the decade ahead.

2.3 The vision sets out a framework to maximise links with partners and stakeholders to build coalitions that help with the delivery of local priorities. It also embeds leadership of the Equality, Diversity, and Inclusion agenda.

2.4 Based on the engagement we undertook to create this Vision we have something that recognises our strengths as a borough and feels authentically Haringey. It sets out a longer-term ambition where the council works together with partners and residents to deliver a 'A place where we can all belong and thrive'.

3. Recommendations

3.4 Cabinet is asked to:

Adopt the Haringey 2035 document at Appendix A to this report and agree for it to proceed to Full Council on 18 November 2024.

4. Reasons for decision

4.1 Haringey 2035 sets a ten-year vision for the borough. The document sets the ambition for the whole borough and a framework through which the ambition would be realised.

4.2 The Borough Vision should be seen as a foundational document setting out the shared ambitions of the Council, our residents and partners.

5. Alternative options considered

5.1 To not publish a new vision - This option is not considered feasible as the LGA Corporate Peer Challenge Review report highlighted the need for the Council to agree an overarching strategic document, which sets the vision for the whole borough and the parameters in which all other strategies operate.

6. Background information

6.1 The Council participating in an LGA Corporate Peer Challenge in May 2023, which was brought to Cabinet along with an Action Plan in autumn 2023. (See Annex B). This Peer Challenge Review Report highlighted the following:

- a) Need for a **long-term vision for the borough** which captures the aspirations of Haringey's communities, provides a clear direction for the Council's activities, and articulates a narrative that identifies the Council's role within the vision.
- b) Maximise links with **partners and stakeholders** using the Council's place leadership role to build coalitions that help with the delivery of local priorities
- c) **Ongoing roll out of the Deal** and aligning metrics for measuring impact

6.2 Following these recommendations and aligning with our ways of working as committed through the Haringey Deal, the Council initiated the process of developing a vision document for Haringey.

6.3 Our engagement approach and process

We began a year-long engagement process in September 2023 with a very broad group of partners, VCS groups, residents, communities and staff. Our engagement approach was based on drawing from existing feedback through recent consultations as well as filling in the gaps through direct sessions with stakeholder groups. We conducted online as well as in-person engagements to include those who may be otherwise excluded digitally, and we actively targeted communities whose voices may otherwise be overlooked to understand their vision for Haringey. The key activities of this engagement process is given below:

Preliminary engagements

- Workshop – partners (3 workshops; invitees representing 48 organisations)
- Online survey – residents, businesses, students and visitors (687 responses)

- Workshops – staff (12 workshops with around 1000 attendees in total)
- Cabinet and backbenchers’ briefings – 3 sessions

Secondary engagements to fill in gaps in feedback

- Young people across different educational settings
- Faith-based groups
- Older people in the borough e.g. pensioners groups
- Communities based on national identities
- Individuals who are homeless or rough sleeping in the borough

We have also drawn on the extensive feedback we received from other consultations and engagements in the recent years including:

- Wood Green Voices
- Tottenham Voices
- Your Bruce Grove
- Health and Wellbeing Strategy
- Community Safety Strategy
- Local Plan
- Hate Crime Strategy
- Parks and Green Spaces Strategy

6.4 The Framework for Change

The framework identifies six Calls to Action which will contribute towards the Cross-cutting Outputs and the Vision itself. These 6 Calls to Action are:

- 1) Safe and affordable housing
- 2) Thriving Places
- 3) Supporting children and young people’s experiences and skills
- 4) Feeling safe and being safe
- 5) Tackling inequalities in health and wellbeing
- 6) Supporting greener choices

We have provided our framework for change, which outlines the cross-cutting outputs that will achieve this vision for Haringey.

Table 1.1 – Borough Vision Framework for Change



7. Contribution to strategic outcomes

The Borough Vision will help to shape the strategic outcomes for the Council, through aligning our subsequent Corporate Delivery Plan in 2026 and the respective Service Plans to the identified priority Calls to Action.

8. Carbon and Climate Change

Includes commitment to supporting greener choices.

9. Statutory Officers comments

Finance

There are no immediate financial implications arising from this report. The Borough Vision's focus on local action based around a partnership and communities approach, with the Council's role best served as the partner creating spaces for conversation and collaboration among other partners, does not envisage a requirement for additional resources over and above those contained in the existing MTFS. Should a need for additional resources be required in the future this will be dealt with through the appropriate reports at that time.

Strategic Procurement (SP)

Strategic Procurement notes the contents of this report and confirms there are no procurement related matters preventing Cabinet approving the Recommendation stated in Paragraph 3 above.

Legal

There is no legal impediment to the approval of the Borough Vision.

Equality

The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

This report seeks cabinet approval to provisionally adopt the Borough Vision, subject to a review at Full Council in November 2024. The Borough Vision seeks to identify the strategic direction of the borough. It aspires to tackle inequality in our borough through advancing the improvements within each Call to Action by making Haringey a place where we can all belong and thrive. Therefore, it is anticipated that the Vision will have a positive impact on protected groups, including children and young people and people from ethnic minority backgrounds, by prioritising equality of opportunity.

This Vision document and its subsequent action plans are not intended as Haringey Council documents, nor would they be delivered through Council action alone but through Action Plans drawn up by partnership coalitions.

The partnership has agreed common principles for working over the next 10 years. This may include preparing yearly action plans and accompanying equalities impact assessments (EQIA) for each plan.

Wherever the Council itself shall take specific policy action based on the borough-wide action plans drawn up, those proposals shall also be accompanied by separate equality impact assessments.

10. Use of Appendices

Appendix A - Borough Vision, 2025-2035

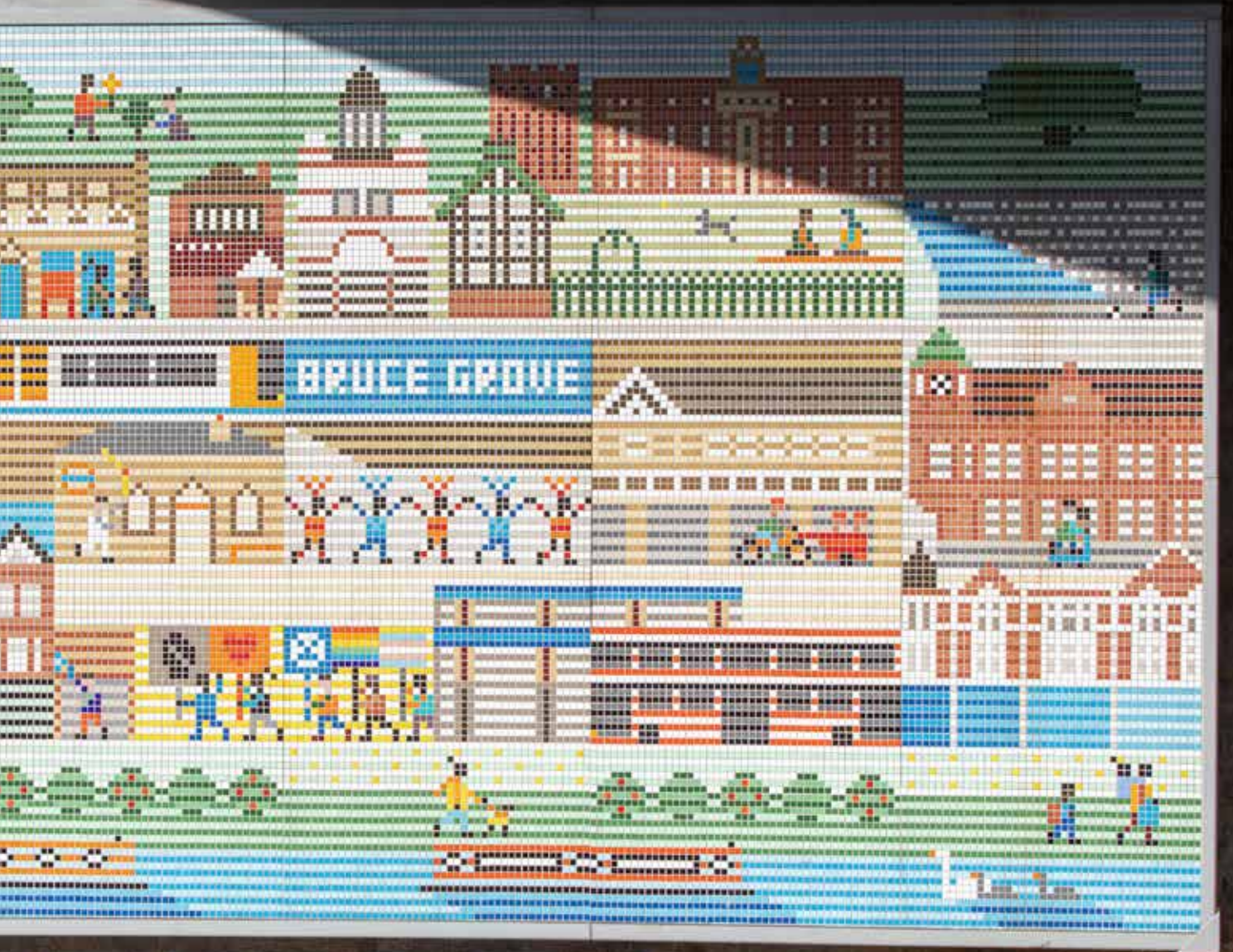
Appendix B - Report of the LGA Peer Challenge Review 2023

11. Local Government (Access to Information) Act 1985

This page is intentionally left blank

Haringey 2035: Our Vision





Contents

Introduction	4
About Haringey	7
How we developed Haringey 2035	8
What residents told us	10
Our Vision – Haringey 2035	12
Framework for change in Haringey	14
Calls to Action: What we heard and our initial priorities	15
The future: How we will work together	28

Introduction



This document sets out our vision of what we want for Haringey by 2035: A place where we can all belong and thrive. We know that positive change happens when people work together and that as a Council we don't have all the answers. Therefore, we have developed this vision in dialogue

with residents, communities and our partners – large and small. But we also hope that by having a shared vision we can galvanise the – too often – scarce resources we all have to achieve our common aims. Together we are greater than the sum of our parts in terms of our reach and resources and at the heart of this vision is genuine co-production and partnership.

Haringey is an incredible part of London. It has so many assets – our world class cultural and sporting institutions, our innovative businesses and entrepreneurs; our great parks, our brilliant schools and nurseries; and most importantly our people. It is the cultural heart of North London – a place where people come together; where difference is celebrated and where anything is possible.

But despite all this, we know Haringey can be even better.

Talking to residents, community groups and voluntary organisations we have heard so many fantastic aspirations for our great borough. We have tried to distil all this down into a simple vision which we believe speaks to those ambitions. In essence, what we heard is that we want a Haringey where all our residents can have the opportunity to thrive and enjoy the best possible version



of their life; where the quality of life in every part of the borough is as good as it is in our cleanest, greenest and safest neighbourhoods; and at a time of insecurity and change Haringey is a place where people feel that they really belong. That is why we have put these three ambitions right at the heart of this vision. We hope you agree.

We want this vision to be grounded in what is distinctive – and special – about Haringey and through working with a broad set of partners we believe we have achieved this. We are a 'Rebel Borough' that is proud of our heritage. We stand against oppression of any nature and remain welcoming towards one and all. This is reflected in our aim to focus on belonging and opportunity. It inspires our commitment towards driving up quality of life, thereby tackling inequality through unlocking opportunity.

This Vision is just the start in setting out a longer-term direction of travel and we look forward to working with our residents and partners to deliver this on our journey to 2035.



Cllr Peray Ahmet
Leader of the Council



Andy Donald
Chief Executive





About Haringey

Haringey is fantastic – the world in one borough. A place brimming with creativity, vibrancy, personality, radicalism, diversity and community. It is a place where we stand up for each other. A place that is proudly distinctive.

For centuries people have come from all over the world and made their home here. They have been welcomed by our communities and in turn have enriched daily life in the borough. Our streets buzz with culture, from food markets to street art, roller discos to Nigerian tapas. Culture and community is in our DNA – it's our greatest strength. Haringey is the London Borough of Culture for 2027 and we are planning a year of opportunities to celebrate our 'Rebel Borough'.

Our working-class history champions change-makers and everyday rebels; revelling in our differences, battling discrimination, championing equality and doing things our own way. We speak 180 languages and are home to many communities. Our incredible and renowned food culture is on show from Green Lanes to West Green Road.

Haringey is a special place. We have great schools, wonderful libraries, green flag parks; thriving shopping centres and high streets brimming with independent shops. We are proud to be home to the renowned Alexandra Palace; historic Bruce Castle Museum; beautiful Finsbury Park; and the world-class Tottenham Hotspur Stadium. As well as to ground-breaking artists, entrepreneurs, activists, educators; and thousands of dedicated and committed key workers.

There is a lot to look forward to over the next decade. Haringey will be London Borough of Culture and in 2028 Tottenham Hotspur Stadium will host European Championship football fixtures - showcasing Haringey to the world.

This vision is about harnessing all this opportunity and building the best possible version of Haringey in ten years' time.



Area: Haringey covers an area of approximately 29.6 square kilometres, making it the 23rd largest borough in London.

Population: As of the latest estimates, Haringey has a population of around 293,503, ranking it 18th in terms of population size among London boroughs.

Population density: Haringey has a population density of about 9,916 people per square kilometre, making it the 12th most densely populated borough in London.

Ethnic diversity: Haringey is highly diverse, with 38% of residents identifying as Black, Asian, and Minority Ethnic (BAME) and 26% identifying as 'white other'.

Languages: Over 180 languages are spoken within Haringey, reflecting our multicultural population.

Age distribution: Haringey's population is aging, with a 24% increase in residents aged 65 and an 8% decrease in children under 15 since 2011.

How we developed Haringey 2035

This vision for Haringey 2035 has been developed in partnership between Haringey Council and our residents, communities, partners, council staff and visitors. The process included surveys, workshops and focus groups aimed at understanding our existing strengths and assets, our challenges, and our priorities. This vision is a product of those conversations and aspirations. It recognises that a strengths-based approach with collaboration and partnership will be at the heart of our success.

OUR PROCESS INVOLVED AROUND 2,000 INDIVIDUALS AND ORGANISATIONS VIA:



IN-PERSON FOCUS GROUPS

to ensure the voices of those too often overlooked were heard.

This included:

- Young people across different educational settings
- Faith-based groups
- Older people in the borough
- Communities based on national identities
- Individuals who are homeless or rough sleeping in the borough



THE RESULT

The result of this process is a vision which is deeply rooted in our culture and values in Haringey. This is a borough that is ambitious for its future but has a clear sense of self. The vision was developed following the principles the council committed to through the Haringey Deal: listening to residents, prioritising relationships and sharing power. We have also drawn from the vast array of feedback the council has received through major engagement processes that have taken place over the last couple of years. This was important to maximise the impact of feedback provided. Some of these recent engagements include:

- Wood Green Voices
- Tottenham Voices
- Your Bruce Grove
- Health and Wellbeing Strategy
- Community Safety Strategy
- Local Plan
- Hate Crime Strategy
- Parks and Green Spaces Strategy



What residents told us

WHAT PEOPLE LIKE MOST ABOUT HARINGEY



THE ISSUES PEOPLE WOULD LIKE TO BE PRIORITISED

- Housing conditions and the availability of more affordable and family-sized homes
- Challenges around social isolation and cost of living pressures
- Inclusive public spaces that foster interactions and cultural exchange
- Reduction in crime, violence, and anti-social behaviour
- Equitable and improved opportunities in education, employment and skills
- Reducing inequalities in health through better access to primary healthcare and mental health and wellbeing
- Fair access to local opportunities for young people in the East and the West of the borough
- Sharing the benefits from regeneration, growth and economic opportunities
- A celebration of the diversity, cohesion and welcoming spirit of our communities
- Facilitating a just transition towards making greener and cleaner choices

Our Vision – Haringey 2035

A place where we can all belong and thrive.

Our vision for Haringey in 2035 is a place where all our residents have the opportunity to thrive and enjoy the best possible version of their life; where the quality of life in every part of the borough is comparable to our cleanest, greenest and safest neighbourhoods; and that at a time of insecurity and change, Haringey is a place where people can put down roots and feel they really belong.

To achieve this vision, we have identified six 'Calls to Action'. These are the priorities that our residents, communities and partners have indicated are the foundations of the future that we want to build. It is through securing progress in these fundamental areas that we will create opportunity, a great quality of life and sense of belonging for all.

At its heart, this vision is about tackling inequality. Only through creating a greater equity of experience can we hope to ensure that everyone in Haringey can share more equally in all that life here has to offer – today and in the future. So, equality and equity will be at the core of our approach to achieving this vision.

Haringey is also in a unique position in London – we enjoy excellent transport links to central London. Through 'telling our story' and maximising our existing assets, we aim to deliver economic growth and ensure that we are a desirable destination for visitors, businesses and development. A key part of this ambition is addressed through our calls to action - developing opportunities for thriving places, good skills, secure income and a shared prosperity for all.

In most of the conversations we had about this vision, one message that came through consistently was the desire to shift and re-frame the narrative about Haringey. Residents and partners alike felt that Haringey is a hidden gem, which doesn't currently garner the positive attention it deserves. We believe that with growth, opportunities and better quality of life over the next decade, Haringey will be established as a desirable destination for one and all to invest in, visit and live. As with other aspirations in this vision, this isn't something that the Council can achieve by itself. Therefore, alongside working in partnership to deliver our Calls to Action, we want to mobilise everyone in the borough to join hands and speak up – telling the story of our fantastic, welcoming and fearless borough to the outside world.



BELONGING



OPPORTUNITY



Our Framework for Change in Haringey

Across Haringey's communities and neighbourhoods, residents want improved opportunities and equity of experiences for everyone. During discussions, they highlighted inequality in opportunities to access healthcare, secure housing and employment. They also shared their struggles with affordability of life in Haringey accompanied by the diminishing sense of belonging in the borough. We therefore developed our cross-cutting outputs to address these challenges.

We believe that these outputs would directly result from prioritising the six fundamental areas in our 'Calls to Action'. We know that these areas of intervention are fundamental for moving the dial on outcomes in the borough – ultimately reducing inequalities, improving our standard of living and creating the conditions for everyone to feel a deep sense of belonging in Haringey.

The language 'Call to Action' has been chosen deliberately in the hope that everyone in the borough – residents, community groups, faith groups, businesses, statutory partners – will adopt this document and commit to take action and help achieve these goals.



Our Calls to Action

London's housing crisis, the post-pandemic cost of living pressures and austerity driven funding cuts have all impacted life in the borough negatively.

As living in London and Haringey has continued to become less affordable, housing and the need for secure jobs has emerged as a key challenge. Resident feedback has highlighted unprecedented mental health struggles, social isolation and homelessness for the most vulnerable. Tackling antisocial behaviour and its impact on young people has also been identified as a top priority by residents.

Despite the best endeavours of the council, partners and communities to address these issues over many years, they remain stubbornly challenging. Galvanising co-ordinated activity through our Calls to Action offers a chance to make progress on them for the future and over the course of this vision we will continue to widen and review stakeholders who can help deliver this vision.

At present our Calls to Action are set out in high level terms. Each will be further defined through working with partners and communities. For more detail see the 'How we will work together' section. However, through workshops with partners, we have identified some initial priority areas that can contribute to each Call to Action. These are set out below.

We hope that communities and partners will use these Calls to Action to consider how best they can contribute and help deliver on our common ambitions.

Call to Action 1:

Safe and Affordable Housing in Haringey

The foundation of a good quality of life and a sense of belonging is a decent, safe and affordable place to call home.

Over the last decade, in common with the rest of London, Haringey has experienced rapid increases in rents in the private rented sector and house prices. Alongside that, many residents have reported declining standards of property maintenance in the private rented sector and in social housing, including damp and mould. Homelessness and rough sleeping have also been on the rise across London. It is apparent that the current housing crisis cannot be tackled through local action alone – it warrants a national and London-wide approach. However, there are actions that can be taken in Haringey, some of which is already underway. They include:



- The council's significant council house building programme which will deliver 3,000 new council homes within the timeframe of this vision.
- Significant investment in existing council homes to improve quality and energy efficiency.
- HMO and landlord licensing, which is helping to drive up standards in the private rented sector.
- Maximising the use of our existing housing stock e.g. through efforts to reduce the number of empty homes in the borough
- Our partners and teams continuing to provide crucial advice to residents about their housing rights.

Initial priorities:

Greater availability of high-quality

advice: Adopting a partnerships approach towards early intervention with the objective of improving housing outcomes and preventing homelessness.

Challenging those who break the

rules: Working together to put a stop to low standards, subletting, and rule breaking by unscrupulous landlords.

Concerted Action and lobbying: build greater numbers of affordable homes through reformed planning regulations and fire safety norms as well as continuing to lobby for good homes for all.



Call to Action 2:

Thriving Places

Haringey is a place where people take pride in their local heritage and communities. We have a history of being a welcoming borough and our diversity is reflected across communities. We know that when they come together, shared experiences build on the strength of our civic and community spirit.



Residents identified parks as one of the key assets in Haringey – areas that kept the community spirit alive during the difficult pandemic years when indoor interactions were severely restricted. Haringey is also blessed with vibrant and busy high streets, thriving markets and a major Town Centre in Wood Green. Our voluntary and community sector, faith groups and a wealth of local social action play a crucial role in making this borough the place it is. By working in collaboration with our Voluntary and Community Sector we can leverage additional funding into the borough. Our Haringey Community Collaborative supports grassroots organisations and underserved groups to build capacity, raise funds and increase impact. We are proud of our high streets which still retain a huge proportion of independent shops unlike in many other areas in London today.

However, increasingly some residents lament the lack of accessible community spaces where social, sports and other cultural activities could be pursued. Young people wish to have access to youth hubs where the offering is driven by their needs and older residents desire free activities that could help tackle increasing social isolation. Businesses desire more opportunities to tap into the potential for growth within London's wider economy. Meeting those needs requires a partnerships effort making creative use of existing spaces, encouraging even more neighbourhood resources for shared use and strengthening social networks.

We also envisage improved opportunities for residents and businesses to participate in place-based growth and economic development, especially through London wide initiatives. Our Shaping Tottenham vision highlights our ambition to make North Tottenham

an international destination for sports, culture and entertainment, set within a vibrant town centre with a proud local identity. Our Borough Vision highlights that Haringey is a place to invest in.

Listening to our communities' immediate place-based needs helped us identify some initial priority actions. The council is committed to working in collaboration to support and enable shared and collective action around these priority areas playing to our existing strengths as a borough.

Initial priorities:

Maximising the use of our existing assets:

maximising community and public spaces in the borough to support economic growth, social cohesion and activities driven by community needs

Creatively sharing spaces and

strengthening networks: utilise the available spaces to facilitate community use, strengthening our community networks through providing platforms for information and cultural exchange

Highlighting the role of green spaces to

improve outcomes: strengthening the positive impact of green spaces in social isolation, health and wellbeing and social cohesion



Call to Action 3: Supporting children and young peoples' experiences and skills

Haringey's young people are vital to shaping our future. We have some of the most civic minded and inspirational young people enriching our culture and our communities. We have fantastic schools and colleges, and our young people thrive in the strong community spirit in the borough.

During our engagements young people shared some of their everyday challenges. These range from the negative impact of insecure housing to lack of accessible sports facilities for those who are economically disadvantaged. Availability of safe spaces, the need for more diverse role models from the borough and more local opportunities were felt to be particularly relevant for most of them. They were frustrated about the existing inequalities in the borough between the East and the West and witnessed firsthand the impacts of divergent health or educational outcomes. Within educational settings, our young people have been disproportionately affected by the knock-on effects of the cost-of-living crisis – their ability to socialise, find safe and adequate spaces after school for studies and afford activities that positively help their development.

We also heard from adults who shared about their inability to maintain employment in an increasingly competitive world and were keen to have access to more upskilling opportunities in the borough. We want to work together across employers, voluntary and community sector, authorities, schools, colleges and communities to improve access to employment and lifelong learning opportunities for everyone in Haringey.

We are keen that our interventions for young people in the borough prioritise their education and social development but are also linked to developing long-term skills, economic stability and community safety. We want to tap into London-wide growth programs and catalyse even greater local economic development in Haringey.



Over the course of the next decade, we want to make Haringey an even better place to grow up and fully unlock the potential of our young people through giving them the environment and skills they need to succeed.

Initial priorities:

Supporting children and families: Working together to ensure every child gets a great start in life - with a focus on tackling the inequalities associated with child poverty, childhood obesity and mental ill health.

Driving opportunities and bridging skills gaps: Identifying skills needs and bridging gaps through training, apprenticeships, work experience and the joined-up provision of information about opportunities.

Facilitate high-quality activities and spaces for young people: to meet the diverse range of interests, needs and experiences that our young people have.

Hearing young people's voices: Encouraging young people's participation in decision making, civic and democratic life in the borough.



Calls to Action 4:

Feeling safe and being safe

Haringey residents take pride in their neighbourhoods and diverse communities. Over the last few years, residents have reported an increase in feeling unsafe in public spaces. This could be a knock-on effect from the London wide trend of increased anti-social behaviour and knife-crime as well as a periodic increase in hate crimes related to geopolitical events.

During discussions, residents and partners indicated that we would all feel safer with improved and visible enforcement in our high streets and initiatives for community policing. Voluntary organisations highlighted the relevance of CCTV and lighting on streets and improving safety through 'designing out crime' in public spaces. Our communities sometimes feel discriminated against due to a lack of cultural competency among staff in certain public services and therefore highlighted the need for co-producing solutions to improve trust and confidence.

There is a broad recognition that there has been a decline in feeling safe in the borough, especially for women and girls and ethnic minorities. Our discussions have highlighted the need to prioritise safety – both being safe and feeling safe through initiating the following priority actions.

Initial priorities:

Improved public confidence and trust: Improve public trust through community policing, just enforcement actions and co-designing solutions with communities.

Multi-agency approach to tackle crime and antisocial behaviour: improving multi-agency action against gun violence, knife crime and violence against women and girls in the borough; and tackling antisocial behaviour through innovative solutions like designing out crime.

Tackling hate and violence in the borough: Utilising community resources and strong partnership action to tackle racism and hate crimes including islamophobia and antisemitism.





Call to Action 5: Tackling Inequalities in Health and Wellbeing

Good health and wellbeing is fundamental to us leading productive and fulfilling lives and it is our ambition to make this possible for everyone in Haringey. The gap in healthy life expectancy is approximately 10 years between the East and West of Haringey; child obesity in Haringey is significantly higher than the London average. These are outcomes we are committed to improve for everyone in Haringey.

Inequalities are also reflected in a wide range of health outcomes, being the worst for our poorest communities and those from Black, Asian and mixed-ethnic backgrounds. We saw evidence of that during the Covid-19 pandemic where these communities suffered disproportionate exposure to and impact from the virus, as a result of health demographics but also socioeconomic factors.

This Call to Action includes adopting a holistic approach by promoting active and healthy lifestyles, supporting healthy choices and improved mental health for everyone. We know that good health and wellbeing is a product of better healthcare interventions but also of tackling related issues like air pollution, unsafe streets and homes, employment security etc. Most public health models recognise that 80% of health outcomes are socially determined. Therefore, we must recognise the need for a systems approach to tackling inequalities in health and wellbeing in Haringey.

Improved access to primary care, increased inclusive spaces for people to connect on health and wellbeing, implementing preventative approaches and working with community leaders and our voluntary and community sector to share information will be at the heart of our efforts. We shall work collaboratively, drawing our shared intelligence across the borough and adapting the following priorities to suit the diverse needs of different communities and areas.



Initial priorities:

Reducing inequalities in health

outcomes: tackling inequalities in healthy life expectancy, mental health and infant mortality.

Focusing on preventative pathways:

improving access to preventative services and support for children and adults within their neighbourhoods.

Reducing barriers to accessing primary

care: adopting a partnerships approach towards reducing barriers through digitisation and implementing national standards in access to primary care.



Call to Action 6: Supporting Greener Choices

Reducing our energy use, minimising our carbon footprint, and choosing greener transport options are all vital steps to achieving a green and sustainable borough. However, the transition to a greener future will only be possible if we recognise and address the different circumstances and resources available to our residents.

We hope to make a start by recognising that knowledge, affordability and individual needs all play a crucial role in facilitating a just transition. We are committed to considering how a broader range of residents, communities and businesses can contribute to the conversation about the changes that the climate crisis demands. We know that this won't succeed if large parts of society feel excluded or dictated to about the choices and changes we all need to make.

Supporting everyone to make greener choices is also complimentary to desirable outcomes in health and social justice. We believe that by supporting residents and businesses to make greener choices we can improve quality of life whilst also doing our bit to tackle the climate emergency. Therefore, we have chosen to prioritise these cross-cutting interventions to support a positive change in attitudes towards nature, resources and consumption.

Initial Priorities:

Taking action: Taking strong action to tackle the climate emergency as a key social justice issue, mitigate climate risks and create opportunities for everyone to make greener choices and be climate resilient.

Connecting communities with nature: Increasing opportunities for nature-based approaches and activities to deliver improved well-being e.g. food growing

Empowering communities and businesses: improving wellbeing through greener choices, harnessing the potential of the circular economy and energy transitions





The context:

where the Borough Vision fits in

The Borough Vision sets our shared vision, goals and priorities for how the council and local partners will work together to shape and improve Haringey over the next decade.

It sits alongside a range of other strategies and plans which together help set the direction for the council's work with partners to ensure we are delivering the best possible services for residents.

Some of these documents focus specifically on the council's own work, while others like the Borough Vision are intended for all organisations and residents in the borough to get behind.

Borough-wide documents	Borough Vision	
	An overarching vision for Haringey over the next 10 years.	
	Local Plan 2026	
	Long-term strategy for development in the borough, including policies used in determining planning applications.	
	Shaping Tottenham	Shaping Wood Green
	Detailed placemaking and transformation plans co-produced with local residents and businesses.	

Council documents	The Haringey Deal	
	The council's approach to working in collaboration with residents.	
	Corporate Delivery Plan	
	A high-level overview of what the council is doing to meet its objectives and priorities.	
	Medium Term Financial Strategy	
	How the council will manage its finances over the next 5 years.	
	Service-specific strategies and plans	
	(e.g. Culture Strategy, Transport Strategy, Wellbeing Strategy, Waste Strategy etc.)	

A mission-led government

Our 6 Haringey Calls to Action focus on local action based on a partnerships approach. However, at the time the vision was drafted, the national government also set out its 5 key missions. There is a lot of common ground between the two. Within that context, where there are opportunities for us to make the case for change in government policy and position so Haringey benefits from the national agenda, we shall do so.

The delivery of the Vision's calls to action will require partnership working with partners like GLA and national government to align and adapt to their policies or make the case for change in some areas. The development of the Vision over the next ten years needs to evolve to respond to the changing policy of central and sub regional government.

BOROUGH VISION CALL TO ACTION

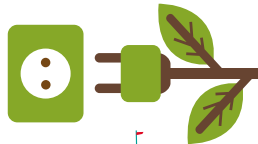
GOVERNMENT'S MISSIONS

Supporting children and young people's experiences and skills



Kickstart economic growth

Supporting greener choices



Make Britain a clean energy superpower

Thriving places

Feeling safe and being safe



Take back our streets

Supporting children and young people's experiences and skills

Safe and affordable housing



Break down barriers to opportunity

Tackling inequalities in health and wellbeing



Build an NHS fit for the future

The Future:

Our principles, ways of working and partnerships in the borough

'The success of the Borough Vision must not only be measured through what we do but how we work together in collaboration to achieve those common goals!'

participant, 3rd workshop for the Borough Vision

When Haringey Council adopted the Haringey Deal in 2022, the council challenged itself to a new way of working with our communities. This included making important decisions about the borough with active involvement from our residents, communities and partners. For the Borough Vision therefore, the process began with invitations to a very broad group of stakeholders to collaboratively chart out this journey towards a 10-year vision.

Over the course of the year from September 2023, Haringey residents, VCS, businesses, Councillors, Council staff and statutory services worked together to seek a common goal for everyone in Haringey. Although we have now developed the vision, its publication is just the beginning of this longer-term partnership journey.

In July 2024, partners agreed that the delivery of our priorities would require further thinking into creative approaches to partnership-based delivery. As a first step, they co-developed a broad set of guiding principles to underpin our collaborative efforts and delivery action.



1. **Governance** – We shall use existing governance arrangements in each sector to progress the Haringey 2035 objectives. Where existing structures are not working, we shall fix them rather than create new ones.
2. **Strategic Action** – We shall explore setting up working groups or community forums for each Call to Action. The group would set goals, monitor progress on each area and report to the whole partnership periodically. Where there are developing or new strategies the Borough Vision will influence them.
3. **Stakeholder participation** – Stakeholders felt that each group working on Calls to Action would discuss and volunteer their contributions towards the priorities and thereafter report progress to the group. This would contribute towards an accountable and measurable system within each area.
4. **Council's role** – Haringey Council would best serve as the partner creating spaces for conversation and collaboration among other partners - i.e. convening, facilitation, linking, infrastructure provision. It should not dominate or lead all of the work.
5. **Enable more partnership work** – All partners will explore creative avenues for collaboration in their individual areas of work – e.g. venues, community access, knowledge sharing, staff networks, translation services, joint healthcare signposting.
6. **Commitment** – All partners would adopt a transparent 'we said, we did' approach towards their contributions to each Call to Action.

Covid-19 and service delivery in its aftermath has highlighted the need to be adaptable and pragmatic in our approach to tackling the biggest challenges. Our stakeholder group wish to remain flexible in adopting bottom-up solutions. Working groups will be set up to deliver on the Calls to Action as well as using existing and emerging partnership bodies.

Every year, Haringey Council plans to convene all partners and stakeholders at a yearly summit to share their creative solutions, feedback on delivery of the vision. Each working group will be encouraged to report on progress and learnings with the wider partnership group and discuss opportunities for partnership working. Working groups would be encouraged to track measurable indicators and record case studies as the partnership progresses towards achieving these priority actions over the next decade.





REPORT OF THE CABINET No. 2, 2024/25

FULL COUNCIL 18 November 2024

Chair: Councillor Peray Ahmet

Cabinet Member for Communities –
Cllr Ajda Ovat

1. INTRODUCTION

This Policy is part of the Policy Framework and has to be adopted by Full Council. The Gambling Policy therefore has to be reviewed by Cabinet first, before recommendation to Full Council for adoption. Section 349 of the Gambling Act 2005 requires the Council, as licensing Authority to prepare and publish its Statement of Gambling Policy at least every 3 years.

2. London Borough of Haringey Gambling Act Policy

The Cabinet Member for Communities introduced the report at the Cabinet on the 15th of October 2024. The report sought approval of the Council's Statement of Gambling Policy for the Gambling Act 2005 for the years 2025-2028. This report advised of the outcome of the consultation which was set out at Table 1 and 2 of the report with most responders expressing their dislike of gambling in general terms.

The review built on information for the Local Area Profiles. These profiles would provide a good evidence base of gambling in the local area and help identify any future risks, which will inform the decision-making process.

In the discussion of the report, the following was noted.

- That the Council was restricted in this policy and limited on actions due to national legislation. However, the consultation provided the Council with useful information around the feelings and concerns of residents across the borough and highlighted the unique work of the borough on gambling harms with extensive work around services which also entailed listening to the voices of those affected by the gambling harms. The Council would look to continuing to improve the protections of people in the borough and beyond from gambling harm.
- In relation to ongoing work going on with London Councils or the Local - Government Association to try and influence changes to legislation and to tackle the concentration of betting shops or adult gaming centres, this was being taken forward. The Council were exploring ways with partners on how to make the case for a reform legislation and ensure there were changes to the regulations. The licensing team were working with public health led by the Cabinet Member for Adults, Social Care and Health and this would be one of the areas to explore.

We Recommend Full Council

1. Adopt The Statement of Gambling Policy 2025 – 2028 at Appendix 1 of the attached cabinet report and to take effect from 31st January 2025, taking into consideration:
 - i) the outcome of the consultation set out in paragraph 8.3 of the attached report and
 - ii) the equality impact assessment in Appendix 3.
2. Agree that, in respect of new casinos, no premises licences shall be granted after the date that this resolution comes into effect and that this resolution shall come into effect on 31st January 2025.
3. To note the supplementary guidance containing the local area profile information at Appendix 2 of the attached Cabinet report.

Report for:	Cabinet, 15 October 2024
Title:	Approval in principle of draft Statement of Gambling Policy 2025-28
Report authorised by:	Barry Francis, Director of Environment and Resident Experience
Lead Officer:	Daliah Barrett,
Ward(s) affected:	All
Report for Key / Non-Key Decision:	Key Decision

1. Describe the issue under consideration

- 1.1 Under Section 349 of the Gambling Act 2005, a Licensing Policy statement must be produced and published every three years. The Licensing Authority is required to consult various specified authorities in revising its Gambling Policy Statement.
- 1.2 The Council's Statement of Gambling Policy for the Gambling Act 2005 for the years 2025-2028 needs to be adopted by Full Council. This report advises of the outcome of the consultation and seeks Cabinet's approval for the revised policy in order that it can be recommended to Full Council for adoption.
- 1.3 The response to the consultation can be found in Table 1 and 2 of the report with most responders expressing their dislike of gambling in general terms.
- 1.4 The review builds on information for the Local Area Profiles. These profiles will provide a good evidence base of gambling in the local area and help identify any future risks, which will inform the decision-making process.

2. Cabinet Member Introduction

- 2.1 The Gambling Policy is part of the Council's policy framework and is required to be revised, consulted and adopted every three years. Section 349 of the Gambling Act 2005 requires all Licensing Authorities to prepare and publish a statement of policy that they propose to apply in exercising their functions under the Act during the term to which the policy applies. Working together with partners, Haringey has developed this document with due regard to all available regulations, conditions, codes of practise, statutory guidance, practical experience of legislation and any consultee responses.
- 2.2 Haringey Council takes its responsibilities as a licencing authority seriously and has concerns about the proliferation of betting shops, particularly on the boroughs High Streets. We welcome the positive effects of considering local area profiles. We

consider this to be a valuable tool to enable Haringey to better assess the impact of betting within our communities.

3. Recommendations

3.1 It is recommended that Cabinet:

- a. **Approve the Statement of Gambling Policy 2025 – 2028 at Appendix 1 and recommend to Full Council that it be adopted with effect from 31st January 2025, taking into consideration:**
 - i) **the outcome of the consultation set out in paragraph 8.3 of the report and**
 - ii) **the equality impact assessment in Appendix 3.**
- b. **agrees that Full Council should resolve that, in respect of new casinos, no premises licences shall be granted after the date that this resolution comes into effect and that this resolution shall come into effect on 31st January 2025.**
- c. **note the supplementary guidance containing the local area profile information at Appendix 2.**

4. Reasons for decision

4.1 The council is obliged to review and adopt A Statement of Licencing Policy for Gambling every three years. The current policy is due to expire in January 2025. Therefore, a new policy must be adopted.

5. Alternative options considered

No alternatives were considered. It is a legislative requirement that the policy be reviewed at least every three years, and that a public consultation is carried out. Failure to review and adopt the statement of gambling policy would result in the council failing to comply with legislation.

6. Background information

6.1 The revised policy statement 2025 to 2028 has been updated to reflect practical changes that have arisen since its publication including statutory guidance.

6.2 Although changes have been made to the Licence Conditions and Codes of Practice (LCCP) there have been no changes to the enabling Gambling Act 2005 with respect to the three licencing objectives remaining the same. They are:

- 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 a fair and open way and

- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

6.3 As a Licensing Authority, we are required by the Act to aim to permit the use of premises for gambling insofar as the authority thinks it is:

- a. In accordance with the Licensing Conditions Code of Practice
- b. In accordance with the guidance issued by the Gambling Commission
- c. Reasonably consistent with the licensing objectives and
- d. In accordance with the statement published by the authority under section 349 of the Gambling Act 2005

6.4 Whilst there is an aim to permit there are safeguards to ensure that Licenced premises uphold the Licensing objective in 7.2. This means Responsible Authorities such as the Police or services responsible for the protecting children and vulnerable residents have a duty to ensure compliance. The Licensing Policy reflects the expected partnership work to tackle ASB, Crime and protecting those vulnerable in the community. The Licensing Authority consults on all applications and ensures that any concerns raised are highlighted and actioned by Responsible Authorities within the remit of the law.

6.5 As part of the statutory requirements, the policy reflects the need for all applicants for gambling premises licences to submit an accompanying risk assessment. This enables the council to better capture equalities considerations and mitigating actions, e.g. the risk assessment should consider whether the premises are located near to areas with high numbers of children and young people, including measures to reduce access for known vulnerable groups and consider local crime statistics, demography and deprivation levels.

6.6 The revised policy and the local area profile supplementary document at Appendix 2 establish that the council has serious concerns of the impact from gambling premises particularly those in the most vulnerable and at-risk areas of the borough. The Council has challenges controlling the number of facilities for gambling whilst balancing and considering its duty to aim to permit gambling insofar as it is reasonably consistent with the pursuit of the licensing objectives.

6.7 All areas shown within the local area profile which are at a higher overall risk of gambling related harm, are generally considered to have communities at greater risk or harm to the vulnerable people living in those areas from gambling facilities. Operators are asked to consider very carefully whether seeking to locate new premises or relocating existing premises within these areas would be consistent with the licensing objectives and the local risks identified.

6.8 The local area profile should be given careful consideration when making an application. Applicants may be asked to attend a meeting with licensing officers to

discuss the profiles, appropriate measures to mitigate risk in the area and how they might be relevant to their application. The local area profiles will be presented to any subsequent licensing subcommittee when they determine an application that has received representations.

- 6.9 The Council recognises that it cannot insist on applicants using the local area profile when completing their risk assessments. However, an applicant who decides to disregard the profile may face additional representations and the expense of a hearing as a result

7. Proposed Changes

- 7.1 . Changes to the policy relate to:

- changes to ward boundaries and their profile shifting the areas of concerns that were previously listed as being vulnerable area. We are however maintaining these locations as we need to carry out further monitoring to see how the changes in boundary lines impact on this issue. All maps and datasets have been updated in the policy. The local area plan is a live document and can be amended at any time to provide further background context.
- amendments that reflect the requirements of new codes issued by the Gambling Commission: Licensing Conditions and Code of Practice (LCCP)
- the Social Responsibility Code. The policy now reflects the requirement for these codes to be followed by the betting industry.

- 7.2 Over the life of the policy, the effectiveness of the policy will be monitored to ensure that the licensing objectives are being promoted. This will be achieved by monitoring whether any issues are identified which affects these licensing objectives.

- 7.3 The new policy will be published on the council website and has already been consulted on, so people are already aware of the proposed changes.

7.4 Consultation

- 7.5 The gambling Act 2005 contains details of the consultees that have been consulted as part of the review of the policy. These were:

- the chief officer of police for the authority's area.
- one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area.
- one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the act.

7.6 In addition, the following were also included in the consultation:

- holders of licences issued under the gambling Act 2005.
- trade associations representing the gambling industry.
- Haringey social services.
- Haringey public health directorate.
- residents' associations; and
- faith groups.

7.7 The consultation was shared with the citizens panel, placed on the council website and a members' forum was offered for further discussion.

7.8 Responses

7.8.1 The consultation process took place between the 9th of July to the 3rd of September 2024 and yielded 20 responses in total.

- a) Overall responses were from residents, and these are summarised in Table 1.
- b) The majority of responses were not in favour of gambling in general.
- c) Residents who responded to the questionnaire appear to have concentrated their views from the summary information for the consultation.

8.8.2 Many of the consultation responses relate to the proliferation of gambling establishments in the Borough and would like to see a reduction. The Gambling Act 2005 does not enable the Council to have a cumulative impact policy for gambling premises, that would allow for restrictions regarding the number of licenses granted.

7.9 Feedback was received from the Climate and Environment Scrutiny Panel and is shown in Table 2 together with a summary of the response received from the Licencing Committee.

Consultation Question	Number of responses/ Totals	Response	Response/Impact on policy if any.
<p>Q – Please tell us your comments on the draft gambling policy</p>	<p>20</p>	<p>It looks good but still we have betting shops in our poorest wards. The shops are usually in high roads where lots of school kids go for food. We need a policy that prevents licensing of betting shops. There are too many. They lead to harm and need to be closed down. Betting shops need to provide facilities for their customers to prevent them using local streets and cafes.</p> <p>Does not go far enough ,living in Tottenham with the amount of poverty in the area really needs you to not provide any new licenses and to never replace the ones that are there</p> <p>Policy should prevent any ward having a significant number of gambling outlets by averaging the total number of outlets across the borough and set this as a maximum for any ward. Over time areas with 'excess' outlets should reduce to the set average.</p> <p>On no account should more in total be allowed anywhere in the borough for all the reasons set forward in your report which addresses this issue.</p> <p>It's a long document to read fully, but I have read in part to get a gist of it. It does not appear to deal with the current situation of over licensing in certain areas where streets are filled with betting offices.</p> <p>I agree with the draft policy.</p> <p>Pointless unless there is a provision for checking that rules are being adhered to.</p> <p>It doesn't appear to address the issues in the east of the borough, particularly Tottenham High Road where there are 3 large gambling establishments just south of Bruce Grove station - a Bookies, a slot machine arcade and another large gambling establishment all within 100 metres of each other. These are in an area that suffers from groups dealing drugs & suffering substance abuse, people drinking in groups, homeless individuals and those suffering mental health issues and very little activity for young people. This is all happening in the vicinity of these 3 establishments. It's unpleasant walking through these individuals and we never see any support or action.</p> <p>Unfortunately not doing enough. Green Lanes and Wood Green are drowning in gambling premises. All of them are a source of constant anti social behaviour including drugs consumption and disturbing public order. This puts vulnerable people and children at risk. There is zero benefit brought to the local area or community by any gambling shop.</p> <p>Strengthen all provisions with penalties leading QUICKLY to fines and/or loss of license.</p>	<p>No change to policy. Context of the policy is compliant with the legislative requirements to aim to permit gambling Operators have mandatory conditions set by the legislation and Gambling Commission that they are required to comply with in this regard. LA has no powers to override these.</p> <p>Betting shop crime centres around damage to machines in the main. LAs are unable to impose any conditions to deter this from happening.</p> <p>Many of the consultation responses relate to the proliferation of gambling establishments in the Borough and we would like to see a reduction.</p> <p>The Gambling Act 2005 does not enable the Council to have a cumulative impact policy for gambling premises, that would allow for restrictions regarding the number of licenses granted.</p> <p>The White Paper on gambling review published in 2023 mentions the intent to make changes to the Act to allow for Cumulative Impact to be considered in the future.</p>

		<p>The borough should ban the issue of new licenses for betting shops. i.e. whatever number exist right now should be the maximum, and no new premises should be permitted to be gambling establishments. These shops suck money out of the poorest parts of our community, and do no social good.</p> <p>It's not strong enough. Gambling ruins lives and shouldn't be encouraged on the high street.</p> <p>Ok</p> <p>Too many gambling place in Tottenham high road</p> <p>The gambling shop on the high road are very close to school within lower Tottenham high road nr to the police station and fire station, also upper Tottenham nr football ground too many and children are not safe from rural gamblers which frightening, the licensing needs to be tightened properly no gambling on Tottenham high road</p> <p>All the good intentions and detailed regulation depend on consistent and timely enforcement. So good administration of applications etc and sufficient officers to carry out inspections etc. is vital otherwise policy is merely wishful thinking.</p> <p>Why no summary? How many Haringey residents are expected to read and understand a 39 page proposal?</p>	
Q -The policy is strong enough to protect children and vulnerable persons from harm			No changes required to policy. The Gambling Commission carries out checks to ensure that gambling processes are being operated in a fair and open way.
Yes	0		
No	20		
Not Stated	0		

Q - The policy is strong enough to prevent gambling premises from being a source of crime			No changes required to policy. Betting premises are age restricted premises in the aim. The Codes of practice require operators to engage with customers and to intervene if they believe a customer to be vulnerable. The Licensing Authority discuss and check on the procedures in place during inspections at gambling premises.
Yes	0		
No	20		
Not Stated			
Q – Do you take part in gambling			No changes required to policy.
Yes	1		
No	19		
Not Stated	0		

Table 1 – Results of the consultation from residents

Table 2 – Comment from Climate, Community Safety & Environment Scrutiny Panel /Licensing Committee

Climate and Environment Committee	<p>Agreed to add into the report at Appendix 2 an overlay of the new ward boundaries agreed in 2022</p> <p>In response to queries about making gambling premises less attractive, it was noted restrictions, such as prohibiting</p>	New ward boundaries have been updated in the table.
-----------------------------------	--	---

	<p>trinkets in shop windows was available and the Council could indicate what they would not want to see into the premises, but this was also covered in the gambling regulations.</p> <p>In response to the issue of compiling Haringey-specific data to strengthen, decision-making on premises permits the Licensing Team leader mentioned the high cost of such research, which had only been pursued by only two other larger authorities, Westminster and Manchester.</p> <p>Continuing the discussion on funding research and lobbying neighbouring authorities or the LGA or collaborating with academic institutions for research a member queried the local Police Commanders' views on gambling shops' impact on resources</p> <p>There was a request for clarity on the number of gambling premises in wards, and consistent figures throughout the report. The Licensing Team Leader agreed to edit the report for clarity.</p> <p>The Panel noted the short consultation period due to minor policy updates.</p>	<p>The Public Health team were undertaking some further work on gambling harms and this issue could be raised with them</p> <p>In response to the query on demographic changes in the take up of gambling with increasing numbers of younger people affected, the normalisation of gambling was a constant and continuing challenge, which the government were aware of.</p> <p>Commissioning research into gambling harm is a separate area of discussion, does not impact on the policy currently.</p> <p>Recommended that the best way was to lobby for implementation of the White paper and legislation implementation that cumulative impact considerations are brought into the legislation.</p>
--	--	---

		This was following advice from the Gambling Commission and when there was a full revision, there would be a full 12-week consultation period.
Licensing Committee	<ul style="list-style-type: none"> • In relation to Paragraph 9.4 on page 65 of the agenda papers, some of the maps had been updated, whereas the deprivation indices ones were still the 2019 ones which had the old wards on it. • The Chair of the Licensing Committee (in liaison with the relevant Cabinet member) could write to the government expressing concerns regarding the need for a cumulative impact policy. The relevant Cabinet Member could write to the Government to raise the issues. • The comment referring to the Regulatory Committee on page 27 of the agenda papers needed to be replaced. • Page 47 of the agenda papers, paragraph 3.89 appeared to have an incomplete sentence. 	<p>Maps remain as taken from the State of the Borough. These maps are in the LAP document so will be updated once the information is made available. This does not impact the policy document.</p> <p>The word Regulatory replaced with Licensing.</p> <p>The word 'licence' now inserted</p>

8. Contribution to the Corporate Delivery Plan 2024-2026 High level Strategic outcomes

- 8.1 Statement of Gambling Act Policy 2025 to 2028 will contribute to our fundamental themes and priorities in the corporate delivery plan 2023 to 2024 which sets out a two-year vision to make Haringey one of London's greatest boroughs where families can thrive and succeed. The plan is organised around the following themes:
- a. Resident experience, participation and collaboration
 - b. Responding to the Climate Emergency
 - c. Children and Young People
 - d. Adults, Health and Welfare
 - e. Homes for the Future
 - f. A Safer Borough
 - g. A Culturally Rich borough
 - h. Place and Economy
- 9.2 Young People – ‘Our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential.’ The protection of children and the vulnerable from harm within the licensing objective will contribute to this priority.
- 9.3 Adults health and welfare - our vision is for a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. How's the borough continues to grow, becomes better connected and continues to be a destination for many Londoners, we will need to ensure that Haringey remains a safe and pleasant environment for all. We want to work with partners in the local community to achieve this and define and shape how the bar and looks and feels, both now and in the future. Residents engaging in the licencing process will contribute to this priority and allow them to have a say in how premises operate. The expectations set out in the policy will inform applicants for licences of the kind of best practise and responsible management expected for well-run premises in the borough.
- 9.4 Health and well-being strategy. Poor mental health has been shown to play significant part in people's gambling habits. People with gambling problems often experience a range of negative effects, including health issues, relationship breakdown, and difficulties with debt. In more severe cases gambling problems can lead to crime, thoughts of suicide or suicide itself. Haringey has the sixth highest rate of domestic abuse with injury in London, money problems within the home may be a contributing factor to this. Because of this, there are increasing calls for gambling to be recognised as a public health issue, where the enjoyment of the money should be balanced again

the protection of the few. The gambling industry is increasingly being called upon to do more to protect participants and prevent problem gambling from occurring and the national responsible gambling strategy emphasises the need for the joint action between industry government health care providers and other public bodies to tackle gambling related harm.

- 9.5 A Safer Borough. The community safety strategy within this priority presents Haringey's approach and priorities to achieving a reduction in crime and anti-social behaviours in Haringey up to 2027. The strategy is supported by a comprehensive strategic assessment that draws on data from across the partnerships to identify trends, patterns, and drivers relating to crime and antisocial behaviours. The local area profile within the gambling policy will draw on data from the strategy. Crime data in relation to betting shops and the operation of Betwatch will feed into the strategy.
- 9.6 The above priorities and objectives are underpinned by several cross-cutting principles namely:
- Prevention and early intervention – preventing poor outcomes for young people and intervening early when help and support is needed.
 - A fair and equal borough – tackling the barriers facing the most disadvantaged and enabling them to reach their potential.
 - Working together with our communities – building resilient communities where people can help themselves and support each other.
 - Customer focus – placing our customers' needs at the centre of what we do.
- 9.7 Licencing is about regulating the carrying on of licensable activities within the terms of the act. The statement of gambling policy should make it clear that licencing law is not the primary mechanism for the general control of nuisance and antisocial behaviour by individuals at these locations. The operators risk assessment and management of the licencing code of practise will be a key aspect of such control and should always be a part of holistic approach to the management of the premises. It is therefore desirable that the SGP is in line with councils' wider objectives on consistent with other policies.

9. Carbon and Climate Change

- 9.1 There are no negative environmental impacts arising from the adoption of a gambling policy and the no casino resolution.

10. Statutory Officers comments

Finance

- 10.1 This report seeks cabinet approval to accept the statement of gambling policy in appendix 1 and recommend to full council to approve and adopt policy.
- 10.2 The council is required to produce and publisher licencing policy statement every three years with the current policy expiring January 2022.

10.3 The council has completed a six-week consultation on the draught statement of gambling policy and the results are set out in paragraph 8.3.

10.4 The acceptance of the recommendation of this report does not give rise to any new financial commitment on the council and the revised policy will be operated within existing revenue budgets.

Procurement

10.5 N/A

Assistant Director for Legal & Governance

10.6 The Assistant Director for Legal and Governance has been consulted in the preparation of this report and comments as follows.

10.7 Section 349 of the Gambling Act 2005 requires the council, as licencing authority, to prepare and publish its Statement of Gambling Policy at least every three years. In preparing its policy statement the council is required to conduct statutory consultation and in accordance with the so-called Sedley principles, the outcome of any consultation must be conscientiously considered in arriving at a decision to recommend the policy for adoption.

10.8 The Gambling Policy Statement at Appendix 1 has been properly consulted upon. It complies with the Gambling Act 2005 and the Gambling Commission Guidance and there is no reason why it should not be adopted.

10.9 In accordance with regulation 4(2) of the Local Authority Functions and Responsibilities England Regulations 2000, Cabinet must be involved in the formulation/preparation of the Council's Gambling Policy. As this policy is part of the policy framework, it must then be adopted by Full Council. The Gambling Policy must therefore be reviewed by Cabinet first, before recommendation to Full Council for adoption.

Equality

10.10 The Council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

10.10.1 Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.

10.10.2 Advance equality of opportunity between people who share protected characteristics and people who do not.

10.10.3 Foster good relations between people who share those characteristics and people who do not.

10.11 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the

duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

- 10.12 An Equalities Impact Assessment (EQIA) has been undertaken to identify any areas that the service review that will have an impact on a protected group. This assessment is included in [Appendix 3]. A summary of the data gathered from the consultation is attached at Appendix 3A
- 10.13 The decision is to approve the council's draft statement of gambling policy for the years 2025 to 2028 in order that it can be recommended to full council for adoption. Whilst there is the potential for negative impacts of gambling harms on children, vulnerable adults and those who are socioeconomically disadvantaged, there are Mandatory Licensing Conditions. However, insofar as the Gambling Act 2005 does not provide powers to local authorities to restrict gambling outfits in particular areas, sufficient mitigations cannot be made to tackle the negative impacts on vulnerable people with protected characteristics.
- 10.14 This policy is compliant with the legislative requirements which is - to aim to permit gambling. Operators have mandatory conditions set by the legislation and the Gambling Commission.

11.Use of Appendices

- 11.1 Appendix 1 - Draft Statement of Licensing Policy.
Appendix 2 - Local Area Plan
Appendix 3 - EQIA
Appendix 3A – Data from consultation survey.

12.Background papers

Gambling Commission Guidance to Local Authority.
State of The Borough

HARINGEY STATEMENT OF GAMBLING POLICY 2025-2028



Contents

Foreword – Cllr Ovat (Cabinet Member)	3
Chapter 1 – The Gambling Act.....	4
2 The licensing objectives	4
3 Haringey London Borough	5
4 Haringey the Borough of Culture	6
5. Integration with other guidance, policies, objectives and strategies	7
5.3 The Haringey Vision /Plan.....	7
5.5 Haringey’s Health and Wellbeing Strategy	8
5.8 A Plan for Growth Jobs & Prosperity	8
5.11 Young people at risk strategy	8
6. The purpose of the Gambling Act 2005 – Statement of Gambling Licensing Policy	9
7. Consultation	10
8 Objectives.....	11
9. Declaration.	11
10. Responsible Authorities	12
11 Interested parties	12
12. Exchange of information	13
13 Gambling Prevalence and Problem Gambling	13
14. Gambling in Haringey.....	13
Chapter 2 Promotion of the licensing objectives.....	14
2 Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.....	14
Ensuring that gambling is conducted in a fair and open way	14
Protecting children and other vulnerable persons from being harmed or exploited by gambling.	15
2.9 Protection of children and vulnerable from being exploited by gambling	15
2.12 Protection of vulnerable people	15
Chapter 3 - Types of Gambling Premises licences.....	17
3.6 Definition of “premises”	18
3.10 Location.....	18
3.12 Licence Conditions Code of Practice (LCCP) - Application of Social Responsibility codes	19
3.17 Local Area Risk Assessments	19
3.20 Guidance for operators on conducting the local area risk assessment	19
3.28 Local Area Profile.....	20
3.39 Duplication with other regulatory regimes.....	22
3.41 Conditions	22
3.48 Door supervision	23
3.50 Adult gaming centres	23
3.55 Licensed family entertainment centres (FECs)	24
3.64 Casinos	25
3.65 Bingo premises	25

3.69 Betting premises	25
3.82 Tracks.....	27
3.88 Travelling fairs	27
3.91 Provisional statements	28
3.95 Reviews.....	28
Chapter 4 - Permits, notices and lottery registrations.	29
4.1 Temporary use notices (TUN).....	29
4.5 Appeals	30
4.7 Occasional use notices	30
4.10 Gaming machines	30
4.13 Permits	31
4.16 Unlicensed Family Entertainment Centre	31
4.20 Club Gaming and Club Machines Permits	31
4.27 Premises licensed to sell alcohol	32
4.32 Prize gaming permits	32
4.35. Small society lottery registrations	33
Chapter 5 Compliance and Enforcement Matters.....	33
5.1. Enforcement	33
5.11 Legislation, Policies and Strategies	35
5.14 National Strategies	35
5.17 Decision Making.....	35
5.18 Committee Terms of Reference	35
5.20 The Licensing Committee	35
5.25 Allocation of Decision-Making Responsibilities.....	35
5.27 Diversity and Equality.....	36
5.29 Human Rights	36
Definitions.....	37

Foreword – Cllr Ovat (Cabinet Member)

Last year's Haringey Gambling Summit and subsequent engagement workshops with residents highlighted that gambling harms affects the health and the lives of thousands of people in Haringey. Gambling harms impact family homes, workplace, our communities and wider society. With our most vulnerable communities being affected i.e. low-income families, children and young people, elderly, ethnic minorities and those who are unhoused, to name a few.

We have listened to our local people whose lives have been deeply affected by gambling, and they have made it clear to us that we must tackle this on a number of levels. It has become a growing public health concern and our vision for Haringey is a borough where residents are protected against the impact of gambling harms.

Haringey acknowledges that the impact of gambling requires a whole borough approach and the importance to ensure that health is considered in all policies, this is including our young people at risk strategy right through to our workforce strategy. Gambling addiction and its impact has far reaching implications across all stages of life.

We have developed Haringey's Gambling Harm Strategy outlining the preventative measures through partnership working with stakeholders to ensure residents receive the necessary information and support services to address their needs. However, this is not enough, and Haringey Council have been a strong advocate urging the Government to recognise and address the significant harms caused by gambling at a national level and grant local authorities with more licensing powers. This Gambling policy and Local Area Profile lays out the risks we are concerned about and associated with the licensing objectives of the Gambling Act 2005; crime and disorder, and the harm/exploitation of children and other vulnerable persons. Haringey's Local Area Profile identifies the area's most vulnerable to gambling, with the highest concentration of gambling premises found in the most deprived areas of Haringey. These areas are already experiencing higher incidence of crime, mental health conditions and demand for debt advice. Haringey is particularly concerned about the health impacts of problem gambling, especially the significantly higher risks associated with gaming machines and gambling addictions.

We expect the gambling operators to respond to those risks through in the way they propose to operate, exercise social responsibility and governance.

We will continue to monitor the impact of gambling on our communities in detail and listen to the views of our residents, public sector partners and voluntary sector.

As a borough we have concerns regarding some of the changes coming out of The White Paper. The recent announcement of cashless payments on gaming machines will have serious implications on gambling harms in our communities. For this reason, Haringey is not supportive of the overall idea to move to cashless payments in betting premises. Communities need to be protected.

We welcome the requirement of the Gambling Commission's Licence Conditions and Codes of Practice for licensees to assess and respond to the local risks to the licensing objectives posed by the provision of gambling facilities at their premises. We will ensure that the local risks assessments produced by gambling operators are meaningful and reflective of the real risks in Haringey. This policy lays out the evidence for what those local risks are, identifies the borough wards in which risks are most manifest, and crucially, clearly defines what sorts of policies, procedures or control measures we expect gambling operators to put in place to mitigate the risks.

Considering local risks is only part of the overall approach needed to control gambling, we are still reliant on gambling operators demonstrating genuine social responsibility and responding to the spirit, not just the letter, of their responsibilities around local risk assessments. We work with operators to strive to meet expectations in full and put in place policies, procedures and control measures that make a genuine difference in reducing the risk of gambling related harms. In particular, we call on operators to respond to our concerns about the addictive nature of gaming machines through policies that promote verified accounts and enable problem gambling to be identified early in a way that triggers effective interventions.

For these reasons, this Authority has set out to establish a gambling licensing policy which recognises good industry practice from responsible operators but sets out to ensure that there are adequate protections to our local community, including the ability to refuse applications if risks cannot be mitigated.

Chapter 1 – The Gambling Act

- 1 Gambling Act 2005 obtained Royal Assent in 2005 and came into effect in 2007. Under Section 349 of the Gambling Act 2005 the Licensing Authority is required to prepare a statement of principles that they propose to apply in exercising their functions under this Act. This process is to be repeated every three years from 31 January 2007. The consultation process is laid out clearly in the Gambling Act 2005, the Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006 and the Guidance to Licensing Authorities issued by the Gambling Commission (www.gamblingcommission.gov.uk).
- 1.1 The purpose of the Statement of Gambling Licensing Policy is to set out the principles that the Council propose to apply when determining licences, permits and registrations under the Gambling Act 2005. Any decision taken by the Council in regard to the determination of licences, permits and registrations should aim to permit the use of premises for gambling in so far as it is reasonably consistent with the licensing objectives, which are:
 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
 - Ensuring that gambling is conducted in a fair and open way
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling
- 1.2 The principles to be applied specifically to the determination of premises licence applications include definition of premises, location, duplication with other regulatory regimes, conditions, door supervision, layout of the premises and supervision of gaming facilities. The policy also specifically mentions adult gaming centres, family entertainment centres, casinos, bingo premises, betting premises, tracks and travelling fairs.
- 1.3 The council has the ability to issue permits for prize gaming and unlicensed family entertainment centres. The council is able to specify the information it requires as part of the application process which will aid determination and this information is described in this Policy. Club gaming and club machine permits are also issued by the council. The process for this is described, along with other processes specified in the legislation for example temporary use notices, occasional use notices and small society lotteries.
- 1.4 Enforcement of the legislation is a requirement of the Act that is undertaken by the council in conjunction with the Gambling Commission. The policy describes the council's enforcement principles and the principles underpinning the right of review. The policy has three appendices, describing the stakes and prizes which determine the category of a gaming machine, a glossary of terms and exempt gaming in pubs and clubs.
- 1.5 The policy opens with a more general introduction to Haringey (Chapter 1), followed by detail on the objectives this Authority will rely on in fulfilling its licensing responsibilities (Chapter 2). Chapter 3 of this Policy sets out the principles and considerations this Authority will go through in determining gambling premises licences. All new and current operators must have regard to this section when compiling local risk assessments and should make this section their starting point when absorbing the content of this policy alongside the Local Area Profile supplementary guidance. The steps that this and other responsible authorities would wish to see given appropriate consideration within risk assessments and operating schedules. It is intended to reflect and enhance industry good practice. This section is also intended to make clear certain aspects of the applications process for the benefit of all. This includes information on consultation, responsible authorities, interested parties and relevant objections. Chapter 4 (permits etc) sets out in some detail the various permits, Chapter 5 deals with enforcement matters, establishing how this Authority and partner service and external agencies intend to work collaboratively together, in a fair, transparent, open and consistent manner, to provide intelligent directed regulation.

2 The licensing objectives

- 2.1 Under the Gambling Act 2005 (the Act) Haringey London Council is the licensing authority for the area and licences premises for gambling activities as well as granting various other gambling permits. In this document, unless otherwise stated, any references to the council are to the Haringey Licensing Authority.
- 2.2 The council will carry out its functions under the Act with a view to aiming to permit the use of premises for gambling, in so far as it is reasonably consistent with the three licensing objectives set out at Section 1 of the Act. The licensing objectives are;
 - preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

- ensuring that gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

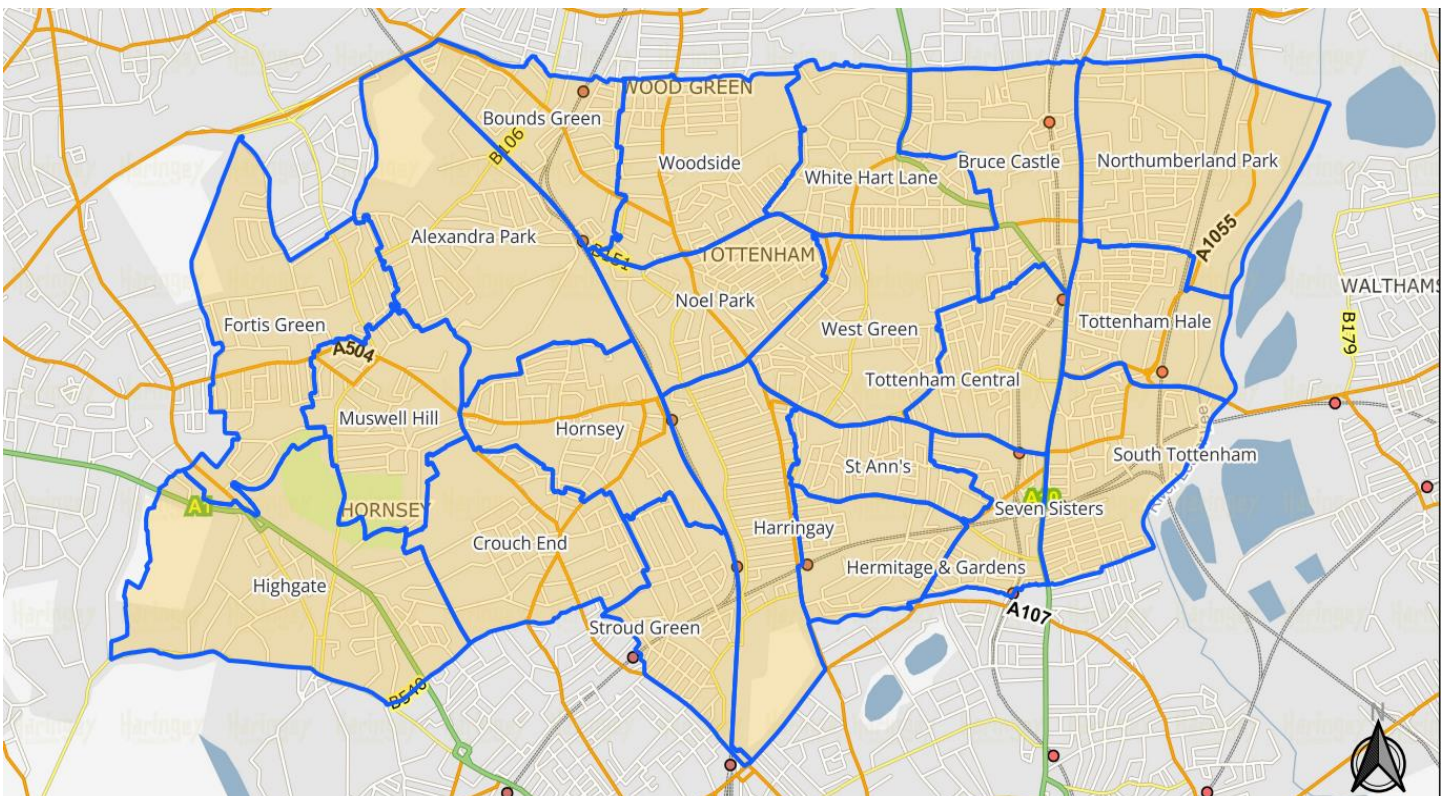
2.3 The council will follow any regulations and statutory guidance issued in accordance with the Act and will have regard to any codes of practice issued by the national gambling regulator, the Gambling Commission.

2.4 The council is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it is;

- in accordance with any relevant code of practice issued by the Gambling Commission
- in accordance with any relevant guidance issued by the Gambling Commission
- reasonably consistent with the licensing objectives and
- in accordance with this document.

2.5 The Gambling Commission's Licence Conditions and Code of Practice (LCCP) require gambling premises to undertake a risk assessment taking into consideration their local information. Specific information about risk assessments is provided in this policy at Chapter 3.

3 Haringey London Borough



3.1 Haringey was created in 1965 by the amalgamation of three former boroughs. It shares borders with six other London boroughs they are Enfield, Waltham Forest, Hackney, Islington, Camden and Barnet. From 1750 until the second half of the twentieth century Haringey gained fame as an entertainment centre with its many parks and open spaces. Haringey covers an area of more than 11 square miles. Some of the more familiar local landmarks include Alexandra Palace, Bruce Castle and Tottenham Hotspur Football Club. The borough has extreme contrasts: areas in the west, such as Highgate, Muswell Hill and Crouch End are among the most prosperous in London, in the east of the borough, such as in Tottenham or Wood Green, some wards are classified as being among the most deprived in London. Haringey is also a borough of contrasts geographically. The borough includes large areas of green space, which make up more than 25% of its total area. Haringey has a range of

cultural events and good transport links. We also have 25 Green Flag Parks Haringey, the population has increased by 3.6%, from around 254,900 in 2011 to 264,200 in 2021. It is Ranked 18 (out of 33 London boroughs) for total population and 12th in London for population density. Haringey's population is older overall, compared to 2011 there has been an 8% decrease in children aged under 15, a 4% increase in adults aged 15 to 64 and a 24% increase in those aged 65 and over. The borough still has a lower proportion of people aged 65+ than London overall, but we're catching up fast.

- 3.2 Deprivation is strongly linked with many health outcomes and there are inequalities in life expectancy across Haringey. There are groups in our communities are more at risk of disadvantage or exploitation. Particular issues include county lines, child sexual exploitation and practices such as Cuckooing. The rate of knife crime in Haringey with injury is the 13th highest in London. We are ranked as the 4th most deprived borough in London as measured by the Index of Multiple Deprivation. Haringey is ranked 49 out of 317 local authorities. This has improved over time with Haringey no longer in the top 10% most deprived authorities.
- 3.3 Haringey has the second highest proportion of working-age people claiming out-of-work benefits (8%) out of all the London boroughs. It is significantly higher than the London average of 5.7%.

[View Haringey deprivation on an interactive map on the ONS website..](#)

- 3.4 The Borough has one of the highest rates of serious mental illness across London (1.37%). This is above the London and England averages of 0.96% and 1.11%, respectively. The economic picture in terms of jobs density in Haringey is relatively low, but there has been significant improvement, and the unemployment rate has improved significantly also. Wages in Haringey now match the London average, but there are a larger number of JSA and ESA claimants than the London average. There are 6.4% of residents that have no qualifications lower than the London average. Haringey has the fourth largest proportion of residents earning below the London Living Wage of all London boroughs.
- 3.5 Each ward in the borough has its own character and challenges. The council has provided general advice in this policy to assist applicants in preparing applications. Applicants are also expected to demonstrate knowledge of their local area when describing the steps they propose to take to promote the licensing objectives. To assist them the council has provided links to data sources where information specific to localities in Haringey in which there is concern relating to impact of licensed premises on the three licensing objectives can be found. Applicants may also consult with the Licensing Team to ensure they have as much information as possible before making their application.
- 3.6 A worrying trend of an increasing number of suicides among men has been identified across the UK, with problem gamblers up to 15 times more likely to take their own life. Although we are unable to establish to what extent gambling addiction has contributed to the actual numbers of suicides in Haringey, there is evidence that the majority of problem gamblers have contemplated suicide. People with poor mental health are at significantly high risk of problem gambling. [Problem gamblers at 15 times higher risk of suicide.](#) There is debate ongoing around the actual link that exists and limited data to support either argument: [Samaritans challenges gambling chiefs use of suicide guidance.](#) Problem gambling appears to be associated with suicide attempts in both young men and young women. This association persisted after adjusting for anxiety, impulsivity, life satisfaction, and other factors, which suggests that other mechanisms, such as the severity and complexity of harms experienced, or gambling to cope with life stressors, might underpin this relationship. Young people with problem-gambling behaviours should be considered at risk for suicidality. Citation: Suicidality and gambling among young adults in Great Britain: results from a cross-sectional online survey Wardle, Heather et al. The Lancet Public Health, Volume 6, Issue 1, e39 - e49 . For further health and deprivation information about the local area visit [mental health and wellbeing framework document pdf 2803kb 0.pdf \(haringey.gov.uk\)](#)

4 Haringey the Borough of Culture

- 4.1 Haringey has strong artistic and sporting traditions throughout the year and has some of the highest attended outdoor events in the country. The borough plays host to many community-led events and boasts a wealth of community-based sports heritage and recreational facilities. The Council itself is a provider of sporting facilities across the borough.

- 4.2 The Council has a tradition of promoting a wide range of cultural activity for the benefit of resident's visitors alike. Commercially promoted events take place in a variety of locations throughout the borough from Finsbury Park to Alexandra Place and the Tottenham Hotspur Stadium to name a few locations. Local communities, groups and associations use church halls and community centres for social and fund-raising activities. Haringey has enduring established reputation for the encouragement of community and diverse cultural events and public entertainment, as an essential aid to community involvement and an increasing sense of common identity.
- 4.3 The council operates schemes that are designed to encourage and promote well run premises and venues across the borough such as the Responsible Retailer Scheme. We acknowledge the benefits that a well-run leisure economy can bring to an area in terms of economic, cultural and community benefits. We have experienced significant levels of growth in entertainment use within the borough coupled with a significant increase in residential development. The proximity of a range of land uses and the creation of mixed-use schemes has many benefits including the creation of a vibrant entertainment economy area in the South Tottenham Area for example. The Council promotes and encourages good business that bring about well-being and a sense of place and commitment in the community.

5. Integration with other guidance, policies, objectives and strategies

- 5.1 In preparing this gambling statement of licensing policy the council has had regard to, and sought to the gambling policy with the following strategies:
- Haringey Corporate Delivery Plan
 - Haringey Health and Wellbeing Plan
 - Haringey Community Safety Plan
 - Young People at Risk Strategy
 - Haringey Local Plan
 - Haringey Economic Growth Strategy
 - Haringey Enforcement Policy
 - Homelessness Strategy
 - Workforce Development Strategy
- 5.2 The council (through its Licensing Committee) may, from time to time, receive reports on other policies, strategies and initiatives that may impact on licensing activity within the remit of the committee. Subject to the general principles set out in this policy and the overriding need to promote the three licensing objectives it may have regard to them when making licensing decisions. The Committee may, after receiving such reports, make recommendations to the council or other bodies about the impact of the gambling licensing policy on such policies, strategies and initiatives. Equally the Committee may make recommendations relating to the impact of such policies, strategies and initiatives on the gambling licensing policy. This may include recommendations to amend the gambling licensing policy itself.
- 5.3 **The Haringey Vision /Plan**
The Haringey Council's Delivery Plan sets out 8 overarching priorities
- i. Resident experience, participation and collaboration
 - ii. Responding to the climate emergency
 - iii. Children and young people
 - iv. Adults, health and welfare
 - v. Homes for the future
 - vi. Safer borough
 - vii. Culturally Rich Borough
 - viii. Place and economy
- 5.4 In the commitment to becoming a more responsive, customer focused council , Haringey faces a number of key challenges, the economy is still recovering from the effects of global recession and the consequences of a changing climate have become apparent., Our future ambition envisions a borough where we tackle complex

challenges and address inequalities by working together. The determination to do things differently is reflected in our commitment to a 'Haringey Deal' published in November 2022. The Deal sets out a series of commitments that the council has made to working differently and building a different kind of relationship with residents and communities. In addressing these challenges, Haringey must be forward-looking and have a clear plan for the future. This gambling licensing policy seeks to promote the licensing objectives within the overall context of the priorities and aims set out in the Corporate Delivery Plan.

5.5 Haringey's Health and Wellbeing Strategy

Health and Wellbeing Strategy focuses on key priorities:

- Creating a healthy place
- Start well
- Live well
- Age well
- Violence prevention

5.7 This strategy sets out initial priority areas of focus within each of these themes. It is now accepted that gambling harm should be managed as a 'whole borough approach'. There is a growing consensus that gambling-related harm should be viewed as a public health issue and therefore, It is important to adopt a 'health in all policies' approach to effectively tackle the negative consequences of gambling. This involves assessing the impact such harm and determining the necessary measures to mitigate impact. In carrying out our regulatory duties we will take into account the effects of gambling on young and vulnerable residents, individuals who are struggling with gambling addiction, their family members and associates, as well as the community as a whole Public Health play an important role through the work they do on the impact of gambling harm in the community puts them in a position to make representation on the objective of preventing vulnerable people from being harmed or exploited by gambling. A paper submitted by Johnstone sets out the desired approach Gambling harm is everybody's business: A public health approach and call to action - PMC (nih.gov)

5.8 A Plan for Growth Jobs & Prosperity

5.9 Haringey's plans for economic Growth Strategy seeks to enhance as a place to do business and attract inward investment and sets out the Councils priorities for the area. Our long-term aim for the borough is to ensure that, by 2030, we are:

- A Fully Employed Borough, by which we mean:
- 75% of Haringey's working age population is in work
- Residents' full-time earnings are in line with London averages for bottom quartile and median earners
- The proportion of working age residents qualified to NVQ Levels 3 and 4 is increased from 65% (2013 figures) to 70%
- A More Dynamic Borough, by which we mean:
- The number of jobs in Haringey has increased by 20,000 from the 2011 London Plan baseline position
- The profile of Haringey-based jobs changes so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly skilled sectors, such as sustainable technology, digital design and skilled/craft manufacturing
- The number of jobs per square metre of employment land has increased by 20%, reflecting a shift to more intensive and productive employment.

5.10 Through business support services, attracting inward investment, delivering 'business friendly' services, in collaboration with partners. The council will encourage investment and growth within the leisure and retail industry within the borough and will seek to minimise any potentially negative impacts from existing and new licensed premises operating in the area. We will ensure that gambling establishments do not carry out any promotional activity on the public highway that encourages or entices the community to bet or take part in gambling.

5.11 Young people at risk strategy

5.12 Haringey and its' partners aim to create a bright future for our children. We will work together with families and communities to ensure that Haringey becomes a place where every child thrives. Empowering families and

communities is the key to unlocking potential and aspirations. The Young People at Risk Strategy is our 10-year plan to address the complex root causes of this issue. It adopts a public health approach, with public sector agencies, voluntary sector groups, communities, and young people themselves working collectively to reduce young people's vulnerabilities and build their resilience.

- 5.13 This strategy focuses on achieving 5 outcomes, based on a comprehensive analysis of the factors that can keep young people safe or increase their vulnerability to involvement in violent crime:
- I. Safe communities with positive things for young people to do, where there are strong role models and trust in institutions.
 - II. Supportive and positive family environments, with low levels of family stress, good parenting; and young people able to develop strong, healthy relationships with peers and trusted adults.
 - III. Confident, happy and resilient young people able to cope with negative experiences, setbacks, and stress.
 - IV. Young people thriving in school, with positive aspirations for the future and access to employment and training opportunities to get there.
 - V. Young people protected from exploitation and from experience of serious youth violence.
- 5.14 This policy contributes to all these outcomes and also ensuring that the most vulnerable are protected as well as improving social, emotional, and mental health and wellbeing as well as supporting young people to make good choices and minimise risk-taking behaviours.

6. The purpose of the Gambling Act 2005 – Statement of Gambling Licensing Policy

- 6.1 Licensing authorities are required by the Gambling Act 2005 to publish a statement of gambling policy which they propose to apply when exercising their functions under the Act. This document fulfils this requirement. Such statement must be published at least every three years. The statement can also be reviewed from “time to time” and any amendments must be consulted upon. The statement must then be re-published. Where updates are required due to changes in national legislation, statutory guidance or contact details the council reserves the right to amend this policy without consultation where it is necessary to ensure policy reflects national legislation or statutory guidance.
- 6.2 The main function of the Council as a Licensing Authority, through its licensing committee, will be to licence premises where gambling is to take place and issue a range of licences, permits and authorisations for gambling in its area. The Licensing Authority will also have power to impose conditions and review licences.
- 6.3 The Council will be empowered by the Act to take enforcement action when an offence under the legislation has been committed. Offences include when premises or activities are unlicensed, or licence conditions are not complied with; to support this enforcement there are powers of entry and inspection.
- 6.4 This policy refers to the Gambling Commission, which has wider functions under the Act and with whom the Council will work alongside as a dual regulator. However, it does not discuss the role and responsibilities of the Commission and any references in this policy will only be insofar as it impacts on, or clarifies, this Authority's functions. For example, the Commission is exclusively responsible for issuing operator and personal licences, which is a necessity before the Council can consider an application for a premises licence.
- 6.5 The Gambling Commission is also mentioned in this policy as being responsible for issuing Codes of Practice and Guidance to licensing authorities regarding the manner in which they are to exercise their functions. This policy endorses the principles set out in the Gambling Commission Guidance and key licensing objectives and confirms that the Council will take account of all such guidance.
- 6.6 Throughout the policy document the use of the term betting establishments means all the land-based facilities that the Council issues Gambling Premises Licences for.

- 6.7 The policy opens with a more general introduction to Haringey (Chapter 1), followed by detail on the objectives this Authority will rely on in fulfilling its licensing responsibilities (Chapter 2). Chapter 3 of this policy sets out the principles and considerations this Authority will go through in determining gambling premises licences. All new and current operators must have regard to this section when compiling local risk assessments and should make this section their starting point when considering the content of this policy alongside the Local Area Profile supplementary guidance. The steps that this and other responsible authorities would wish to see given appropriate consideration within risk assessments and operating schedules. It is intended to reflect and enhance industry good practice. This section is also intended to make clear certain aspects of the applications process for the benefit of all. This includes information on consultation, responsible authorities, interested parties and relevant objections. Chapter 4 (permits etc) sets out in some detail the various permits, Chapter 5 deals with enforcement matters, establishing how this Authority and partner service and external agencies intend to work collaboratively together, in a fair, transparent, open and consistent manner, to provide intelligent directed regulation.

7. Consultation

- 7.1 Haringey Council consulted widely upon this Policy statement before finalising and publishing. A list of those persons consulted is provided below, in line with the Act and the Gambling Commission's Guidance.
- The Chief Officer of Police;
 - The Fire Authority
 - One or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area;
 - One or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Gambling Act 2005.
 - Services within the Council with an interest in the gambling process (Responsible Authorities)
 - Local Safeguarding Children Board
 - Councillors
 - H.M Revenue and Customs
 - Other organisations that appear to be affected by licensing matters covered in the Policy.
 - Neighbouring boroughs.
 - Local resident's association/General public
- 7.2 Our consultation took place between 09th July 2024 and 3rd September 2024 and we followed the HM Government Code of Practice on Consultation (published July 2012).
- 7.3 The full list of comments made and the consideration by the Council of those comments is available/will be available by request to: Licensing@haringey.gov.uk / via the Council's website at: www.haringey.gov.uk/licensing
- 7.4 The policy was approved at a meeting of the Full Council on (TBC) and was published via our website on. Copies were placed in the public libraries of the area as well as being available in local libraries.
- 7.5 Should you have any comments as regards this policy statement please send them via e-mail or letter to the following contact:
- Licensing Team**
Level 4 Alexandra House
10 Station Road
Wood Green
London
N22 8RA
licensing.licensing@haringey.gov.uk
- 7.6 It should be noted that this statement of licensing policy will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Gambling Act 2005. The council acknowledges that it may need to depart from this policy and from the guidance issued under the Act in individual and exceptional circumstances, and where the case merits such a decision in the interest of the promotion of the licensing objectives.
Any such decision will be taken in consultation with the appropriate legal advisors for the Licensing Authority, and the reasons for any such departure will be fully recorded.

8 Objectives

- 8.1 In exercising most of its functions under the Gambling Act 2005 the Council as the Licensing Authority 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 used to support crime;
 - Ensuring that gambling is conducted in a fair and open way
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 8.2 It should be noted that the Gambling Commission has stated: “The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling.”
- 8.3 The Council is aware that, as per Section 153, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling insofar as it thinks it is:
- **In accordance with any relevant code of practice issued by the Gambling Commission;**
 - **In accordance with any relevant guidance issued by the Gambling Commission;**
 - **Reasonably consistent with the licensing objectives;**
 - **In accordance with the Council’s Statement of Licensing Policy. In particular, the Council requires operators to take account of the local area profile of the borough contained within this policy.**
- 8.4 The Council is required under the Act to:
- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences;
 - Issue Provisional Statements;
 - Regulate members’ clubs who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits; Issue Club Machine Permits to Commercial Clubs;
 - Grant permits for the use of certain lower stake gaming machines at unlicensed family entertainment centres;
 - Receive notification from alcohol licensed premises (under the Licensing Act 2003) of the use of two or fewer gaming machines;
 - Issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines;
 - Register small society lotteries below prescribed thresholds;
 - Issue Prize Gaming Permits; Receive and endorse Temporary Use Notices;
 - Receive Occasional Use Notices;
 - Provide information to the Gambling Commission regarding details of licences issued (see section below on information exchange);
 - Maintain registers of the permits and licences that are issued under these functions.
- 8.5 It should be noted that local licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via Operator Licences.
- 8.6 The Council recognises that the licensing function is only one means of promoting delivery of the three objectives and should not therefore be seen as a means for solving all problems within the community. The Council will therefore work in partnership with neighbouring authorities, Metropolitan Police Service, the Community Safety Partnership, local businesses, local people and those involved in child protection to promote the licensing objectives as outlined. In addition, the Council recognises its duty under Section 17 of the Crime and Disorder Act 1998, with regard to ensuring it is taking steps to prevention of crime and disorder in the borough.

9. Declaration.

- 9.1 This statement of licensing policy will not override the right of any person to make an application, make representations about an application, or apply for a review of a **licence**, as each will be considered on its own merits and according to the statutory requirements of the Gambling Act 2005.
- 9.2 In producing this document, the council declares that it has had regard to the licensing objectives of the Gambling Act 2005, the guidance issued by the Gambling Commission, and any responses from those consulted on the policy statement.

10. Responsible Authorities

- 10.1 The Act empowers certain agencies to act as responsible authorities so that they can employ their particular area of expertise to help promote the licensing objectives. Responsible authorities are able to make representations about licence applications, or apply for a review of an existing licence. Responsible authorities will also offer advice and guidance to applicants.
- 10.2 The council is required by regulations to state the principles it will apply to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The principles are:
 - The need for the body to be responsible for an area covering the whole of the licensing authority's area and the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group etc.
 - Answerable to democratically elected Councillors and not to any particular interest group.
- 10.3 In accordance with the regulations the Council designates the Director of Children Services for this purpose.
- 10.4 The following are Responsible Authorities:
 - The Gambling Commission
 - His Majesty's Commissioners of Customs and Excise (now known as His Majesty's Revenue & Customs)
 - The Metropolitan Police Service
 - The London Fire and Emergency Planning Authority
 - The Council, as Licensing Authority
 - The Council, as Planning Authority
 - The Council's Director of Children's Services
 - The Council's Environmental Health Service
 - Any other person or body who may be prescribed by regulations made by the Secretary of State for Culture, Media and Sport ('The Secretary of State')
- 10.5 Contact details of all the Responsible Authorities under the Gambling Act 2005 are available on the Council's web site. Contact details of all the responsible authorities under the Gambling Act 2005 are available on the council's website.

11 Interested parties

- 11.1 Interested parties are certain types of people or organisations that have the right to make representations about licence applications, or apply for a review of an existing licence. These parties are defined in the Gambling Act 2005 as follows:

"For the purposes of this Part a person is an interested party in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the applications is made, the person-

 - lives sufficiently close to the premises to be likely to be affected by the authorised activities,
 - has business interests that might be affected by the authorised activities, or
 - represents persons who satisfy paragraph (a) or (b)"
- 11.2 The Council is required by regulations to state the principles it will apply to determine whether a person is an interested party. The principles are:
 - Each case will be decided upon its merits. The council will not apply a rigid rule to its decision making. It will consider the examples of considerations provided in the Gambling Commission's Guidance to local authorities.

- Within this framework the Council will accept representations made on behalf of residents and tenants associations.
- In order to determine if an interested party lives or has business interests, sufficiently close to the premises to be likely to be affected by the gambling activities, the council will consider factors such as the size of the premises and the nature of the activities taking place.

11.3 The following are not valid reasons to reject applications for premises licences:

- a. Moral objections to gambling
- b. The 'saturation' of gambling premises unless there is evidence that the premises pose a risk to the licensing objectives in that locality
- c. A lack of 'demand'
- d. Whether the proposal is likely to receive planning or building regulations consent

11.4 The council will provide more detailed information on the making of representations in a separate guidance note. The guidance note has been prepared in accordance with relevant Statutory Instruments and Gambling Commission guidance.

12. Exchange of information

12.1 Licensing authorities are required to include in their policy statement the principles to be applied by the authority with regards to the exchange of information between it and the Gambling Commission, as well as other persons listed in Schedule 6 to the Act.

12.2 The principle that the council applies is that it will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information which includes the provision that the Data Protection Act 2018 will not be contravened. The council will also have regard to any guidance issued by the Gambling Commission to local authorities on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

13 Gambling Prevalence and Problem Gambling

13.1 In 2016 the Gambling Commission commissioned research by Nat Cen to study gambling behaviour in the UK. The research was published in 2018 and its aim was to:

- Describe the prevalence of gambling participation, at-risk gambling and problem gambling and;
- Explore characteristics associated with gambling participation, at-risk gambling, and problem gambling.

13.2 It found overall, 57% of adults aged 16 and over in Great Britain had gambled in the past year. Men were more likely to have gambled (62%) than women (52%). The most popular gambling activity was the National Lottery draws with 41% of adults (46% of men and 37% of women) buying a ticket in the past year. Four in 10 adults (42%) had gambled activities other than the National Lottery draws; 46% of men and 38% of women.

13.3 The highest rates of low-risk gambling were found among people who had participated in betting exchanges (28.5%), machines in a bookmakers (25.7%), spread betting (22.8%), online gambling on slots, casino or bingo games (21.9%), any other gambling (21.8%) and betting on any other events that are not online (21.7%).

13.4 The highest rates of moderate risk gambling were found among people who had participated in spread betting (28.8%), poker in pubs or clubs (16.1%), betting on other events that are not online (15.0%), online gambling on slots, casino or bingo machines (13.7%) and machines in bookmakers (13.5%).

13.5 Problem gamblers from ethnic minority groups observed in the survey samples. When combining data collected in 2012, 2015 and 2016, problem gambling is associated with ethnicity. Across all three survey years, the proportion of problem gamblers tends to be higher among people from Black ethnic groups and among other minority groups (not covered by White, Black or Asian) than among those from Asian and White backgrounds.

14. Gambling in Haringey

14.1 In April 2011 a Haringey scrutiny report noted that betting shops were located disproportionately within the east of the borough (85%), and that there was a correlation between the location of betting shops and social deprivation with 43% of betting shops are located in the most deprived super output areas 10%) of the borough.

- 14.2 Although gambling is a legal entertainment activity it can, in some locations have a negative impact on individuals and the wider community. The Council has worked to understand how gambling can affect its Residents and visitors.

The Council has also sought to identify individuals who live in the local area who are potentially vulnerable to gambling related harm. Haringey has considered the evidence gathered on the health/social impacts of gambling through our partners such as Public Health and information gathered through the Joint Strategic Needs Assessment as well as the State of Borough to bring together the local area profile. We expect license applicants/holders to take account of that information to mitigate those impacts effectively through their risk assessments and thereby have meaningful dialogue with the Council, Police and other partners in addressing the concerns identified.

Chapter 2 Promotion of the licensing objectives

- 2 Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- 2.1 This licensing authority is aware that the Gambling Commission will be taking a leading role in preventing gambling from being a source of crime, and that regulatory issues arising from the prevention of disorder are Likely to focus almost exclusively on premises licensing, which is the remit of the Licensing Authority. The Gambling Commission's guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Where an area is known to have high levels of crime this authority will consider carefully whether gambling premises are suitable to be located there, taking into account such factors as,
- levels of recorded crime,
 - the type of that crime,
 - levels of ASB related complaints.
- 2.2 Applicants are advised to examine crime and ASB statistics that relate to the vicinity of their application. This will allow for the application to be tailored to the specific locality and to include any additional measures potentially required to support the objective to be set out in the application. This may also reduce the likelihood of objections being made to the application. Advice about accessing such data can be provided by the Licensing Authority.
- 2.3 This Licensing Authority accepts that issues of nuisance cannot be addressed via the Gambling Act provisions, although preventing gambling from being a source of disorder is a licensing objective. The Licensing Authority is also mindful that what starts as nuisance may subsequently escalate to disorder, and that such disorder can have a serious effect on the lives of local residents. If an application for licence review were to be made on the basis of disorder the authority will then distinguish between disorder and nuisance, considering factors such as:
- whether police assistance was required;
 - how threatening the behaviour was to those who could see it;
 - how frequently it is reported;
 - prevalence of persons loitering outside;
 - the times of day when disorder is reported;
 - the impact on residents.
- 2.4 Issues of nuisance cannot be addressed by the Gambling Act provisions however problems of this nature can be addressed through other legislation as appropriate.

Ensuring that gambling is conducted in a fair and open way

- 2.5 The council is aware that except in the case of tracks generally the Gambling Commission does not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences.
- 2.7 However, the council will familiarise itself with operator licence conditions and will communicate any concerns to the Gambling Commission about misleading advertising or any absence of required game rules or other matters as set out in the Gambling Commission's Licence Conditions and Code of Practice. Examples of the specific

steps the council may take to address this area can be found in the various sections covering specific premises types in Chapter 3 of this document and also in Chapter 4 which covers permits and notices

Protecting children and other vulnerable persons from being harmed or exploited by gambling.

- 2.9 Protection of children and vulnerable from being exploited by gambling this licensing objective means preventing children from taking part in most types of gambling. The council will therefore consider whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances / machines, segregation of areas etc.
- 2.10 In premises that may attract children this Authority expects licence holders to train staff to recognise child sexual exploitation, and for staff to be able to demonstrate an understanding of the steps they should take if their suspicions are aroused. The Act provides the following definition for child and young adult in Section 45: Meaning of “child” and “young person”
1. In this Act “child” means an individual who is less than 16 years old.
 2. In this Act “young person” means an individual who is not a child but who is less than 18 years old.

For the purpose of this section protection of children will encompass both child and young person as defined by the Act.

- 2.11 The council will pay particular attention to any codes of practice which the Gambling Commission issues as regards this licensing objective in relation to specific premises. Examples of the specific steps the council may take to address this area can be found in the various sections covering specific premises types in Chapter 3 of this document and also in Chapter 4t D which covers permits and notices.

2.12 Protection of vulnerable people

- 2.13 The council is aware of the difficulty in defining the term “vulnerable person” The Gambling Commission have identified five main factors that can contribute to an individual's vulnerability. These include personal and demographic factors such as poor physical or mental health, physical or cognitive impairment, side effects from a brain injury or medication, or addiction. Situational factors such as financial difficulties, homelessness, domestic or financial abuse, caring responsibilities, life changes, or sudden change in circumstances can also make a person vulnerable. Behavioural factors such as high levels of trust or a high appetite for risk can also contribute to vulnerability. Market- related factors such as engaging in complex activities with a lack of knowledge and experience of the market can increase vulnerability. Lastly, access factors such as poor literacy or numeracy skills, lack of knowledge, or dyslexia can make it difficult for individuals to access information. The Care Act 2014 imposes a requirement on a local authority to “make enquiries if it has reasonable cause to suspect that an adult in its area, whether or not ordinarily resident there, has needs for care and support, is experiencing, or is at risk of, abuse or neglect, and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.”
- 2.14 The local authority must make whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case (whether under this Part or otherwise) and, if so, what and by whom. “Abuse” includes financial abuse; and for that purpose, “financial abuse” includes having money or other property stolen being defrauded, being put under pressure in relation to money or other property and having money or other property misused.
- 2.15 Department of Health document “No Secrets” from 2000 offers a definition of a vulnerable adult as a person “who’ is or may be in need of community care services by reason of mental or other disability, age or illness; And who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.”
- 2.16 Beckett University published research into Problem Gambling (Kenyon, Ormerod, Parsons and Wardle, 2016). This research looked specifically at identifying groups of the society that could be considered vulnerable to problem gambling:

- 2.17 **Young people** – rates of problem gambling among young people who gamble are higher than older adults and youth gambling behaviours are consistent with the harm paradox, whereby these age groups are less likely to gamble generally but those that do are more likely to experience difficulties with their behaviour (Wardle, 2015).
- 2.18 **Minority ethnic groups** – There is consistent evidence that those from Asian or Black backgrounds are more vulnerable to gambling problems and there is clear evidence of the harm paradox (Wardle, 2015).
- 2.19 **Unemployed and constrained economic circumstance** – generally those of lower income are less likely to gamble but those that do spend a higher proportion of their income on gambling. This is highlighted as a concern given the lesser ability of lower income households to protect themselves from financial instability (Brown et al, 2011).
- 2.20 There is evidence that those in debt and those using money lenders and/or pawnbrokers are more likely to be problem or at-risk gamblers (Meltzer et al, 2012). The relationship between constrained economic circumstances and gambling problems is likely to be complex and multi-faceted. It may be mediated by other economic opportunities and personal feelings about how well off you are compared with others. Despite this complexity, there is a consistent body of evidence showing that, for whatever reason, those who are unemployed and who gamble are more likely to experience adverse outcomes from their gambling than those in paid employment.
- 2.21 **Area deprivation** – There are several national surveys that have consistently shown that those living in more deprived areas are more likely to experience problems with their gambling behaviour. This was despite having roughly the similar levels of past year gambling participation to those who live in less deprived areas.
- 2.22 Wardle (2015) looked at the distribution of machines and licensed betting offices and argues that there was clear and consistent evidence of a spatial skew, whereby high-density machine zones or areas with licensed betting offices are located in more deprived area. Recent research has shown that among gamblers who held loyalty cards, rates of problem gambling (28%) were higher among those who lived within 400 metres of a concentration of betting offices than those who did not (22%) (Astbury & Wardle, 2016).
- 2.23 **Homeless** – Homeless people in the UK are more vulnerable to gambling problems than the general population. According to a study by Sharman et al (2014), 11.6% of the homeless population in London had a gambling problem compared to only 0.7% in the general population. The study found that engagement with gambling tends to be problematic among the homeless population, and more research is needed to understand the complex relationship between gambling and homelessness. Sharman, S., Dreyer, J., Aitken, M., Clark, L., & Bowden-Jones, H. (2014). Rates of problematic gambling in a British homeless study: A preliminary study. *Journal of Gambling Studies*, 31,(2), pp. 525-532.
- 2.24 **Mental ill health** – There is a strong association between mental ill health and problem gambling. Associations were found between problem gambling and general anxiety disorder, phobia, obsessive compulsive disorder, panic disorders, eating disorders, probably psychosis, attention deficit hyperactivity disorder, post-traumatic stress disorder, harmful and hazardous levels of alcohol consumption and drug addiction.
- 2.25 Being a problem or at-risk gambler is associated with latter onset of major depressive disorder, alcohol use and dependence, drug use and experience of any mental disorder. Illegal drug use and experience of any mental disorder is also associated with the subsequent onset of at risk and problem gambling. These findings seem to confirm the conclusion that the relationship between problem gambling and mental ill health may be cyclical.
- 2.26 **Substance abuse/misuse** – The evidence base relating to the relationship between substance abuse/misuse and experience of problem gambling broadly measures that of mental ill health. Evidence from British based surveys has shown that rates of problem gambling were higher among those with alcohol dependence (3.4%) or drug dependence (4.4%) than the general population (0.74%) (Wardle, 2015). A systemic review of those seeking treatment for gambling problems showed that 15% also experience alcohol dependence and 7% have other substance abuse disorders (Dowling et al, 2015). There is strong evidence that alcohol and substance misuse are associated with problem gambling. As with other mental health conditions, these conditions can occur at the same time.
- 2.27 **Personality traits/cognitive distortions** – There is a strong body of evidence highlighting the relationship between various personality traits, such as cognitive distortions or impulsivity, with problem gambling. Cognitive distortions, such as erroneous perceptions of gambling and illusion of control are well established risk factors for problem gambling (Johansson et al, 2009). However little research has been conducted to explore the complex interaction of personality traits with other factors and their combined influence on the experience of broader gambling harms. Certain personality traits and/or cognitive distortions are just one potential aspect of vulnerability which is likely to be affected by a range of other factors.

- 2.28 Problem gamblers seeking treatment – Because this group is in the process of attempting to recover from gambling problems they should be treated as a vulnerable group in their own right (Wardle, 2015).
- 2.29 Problem gambling can affect anyone at any time. Whilst rates of problem gambling among all adults in Britain tend to be less than 1% (1.4% in large metropolitan areas), there are some groups that are more likely to experience problems. These groups could all be considered vulnerable to gambling problems. Haringey Council already works with many of these groups however operators should consider these groups in their Local Risk Assessments, especially in relation to identifying the people in these groups, and mitigating harm experienced by them.
- 2.30 In the case of premises licences the council is aware of the extensive requirements set out for operators in the Gambling Commission's Code of Practice regarding social responsibility. In this document the Gambling Commission clearly describe the policies and procedures that operators should put in place regarding:
- Combating problem gambling
 - Access to gambling by children and young people
 - Information on how to gamble responsibly and help for problem gamblers
 - Customer interaction
 - Self-exclusion
 - Employment of children and young people
- 2.31 All applicants should familiarise themselves with the operator licence conditions and codes of practice relating to this objective and determine if these policies and procedures are appropriate in their circumstances. The council will communicate any concerns to the Gambling Commission about any absence of this required information.
- 2.32 Applicants may also like to make reference to documentation published by Haringey Safeguarding Adults Board which provides extensive guidance on identifying vulnerable people and what can be done to reduce risk for this group. This guidance can be accessed via [Safeguarding Adults Policies and Procedures | Haringey Council](#)
- 2.33 Applicants should consider the following proposed measures for protecting and supporting vulnerable people, for example:
- leaflets offering assistance to problem gamblers should be available on gambling premises in a location that is both prominent and discreet, such as toilets
 - training for staff members which focuses on building an employee's ability to maintain a sense of awareness of how much (e.g. how long) customers are gambling, as part of measures to detect people who may be vulnerable
 - Ensuring that all customer facing staff interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This includes identifying and interacting those who may be at risk of gambling harm.
 - Gaining an understanding of the impact and effectiveness of customer interactions undertaken.
 - Training personnel to identify potential gambling related harm and provide support to those who are potentially vulnerable such training could also include awareness of the potential impact of parental gambling on children, including financial, emotional or abusive harms as well as young persons with special educational needs and/or mental health vulnerabilities.
 - self-exclusion schemes and procedures for ensuring that self-excluded individuals are not sent marketing materials and cannot access gambling for the duration of their exclusion.
 - Participation in multi-operator self-exclusion schemes
 - operators should demonstrate their understanding of best practice issued by organisations that represent the interests of vulnerable people
 - posters with GamCare Helpline and website in prominent locations
 - windows, entrances and advertisements not to be positioned or designed to entice children or vulnerable people. No promotional activity on the public highway to encourage gambling participation.
- 2.34 It should be noted that many of these measures are regulatory requirements for non-remote operators, as set out within the Social Responsibility Codes issues by the Gambling Commission.
- 2.35 The council may consider any of the above or similar measures as licence conditions should these not be adequately addressed by any mandatory conditions, default conditions or proposed conditions by the applicant.

Chapter 3 - Types of Gambling Premises licences

- 3.1 Premises licences are subject to the requirements set-out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.
- 3.2 The Council is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it: is :
 - in accordance with any relevant code of practice issued by the Gambling Commission;
 - in accordance with any relevant guidance issued by the Gambling Commission;
 - reasonably consistent with the licensing objectives; and
 - in accordance with the authority's statement of licensing policy.
- 3.3 It is appreciated that as per the Gambling Commission's Guidance for local authorities "moral objections to gambling are not a valid reason to reject applications for premises licences" (except as regards any 'no casino resolution') and also that unmet demand is not a criterion for a licensing authority.
- 3.4 The council will issue premises licences to allow those premises to be used for certain types of gambling. For example, premises licences will be issued to amusement arcades, bingo halls, bookmakers and casinos.
- 3.5 Applicants should also be aware that the Gambling Commission has issued Codes of Practice for each interest area for which they must have regard. The council will also have regard to these Codes of Practice.

3.6 Definition of “premises”

Premises are defined in the Act as “any place.” Different premises licences cannot apply in respect of a single premises at different times. However, it is possible for a single building to be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being different premises. Whether different parts of a building can properly be regarded as being separate premises will always be a question of fact in the circumstances.

- 3.7 The council will take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, the council will assess entrances and exits from parts of a building covered by one or more licences to satisfy itself that they are separate and identifiable so that the separation of different premises is not compromised and that people do not 'drift' into a gambling area.
- 3.8 The council will pay particular attention to applications where access to the licensed premises are through other premises (which themselves may be licensed or unlicensed). Issues that the council will consider before granting such applications include whether children can gain access, compatibility of the two establishments; and the ability to comply with the requirements of the Act. In addition, an overriding consideration will be whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the Act.
- 3.9 An applicant cannot obtain a full premises licence until they have the right to occupy the premises to which the application relates.

3.10 Location

- 3.11 The council is aware that demand issues(for example, the likely demand or need for gambling facilities in an area) cannot be considered with regard to the location of premises but that considerations, in terms of the licensing objectives, can be. The council will pay particular attention to the protection of children and vulnerable people from being harmed or exploited by gambling, as well as issues of crime and disorder. With regards to these objectives, it is the council's policy, upon receipt of any relevant representations, to look at specific location issues including:
 - the possible impact a gambling premises may have on any premises that provide services to children or young people, for example a school, or vulnerable adult centres in the area
 - the possible impact a gambling premises may have on residential areas where there may be a high concentration of families with children, the size of the premises and the nature of the activities taking place
 - levels of organised crime in the area.

In order for a specific location to be considered as inappropriate for a premises licence to be issued, the council will need to be satisfied that there is sufficient evidence that the granting of a premises licence at the proposed location would be detrimental to the licensing objectives. Although the council cannot consider if there is a need or demand for the gambling facilities applied for, applicants should consider the proximity of other gambling premises in the Local Risk Assessment and the cumulative impact this will have on residents, including children and other vulnerable groups.

3.12 Licence Conditions Code of Practice (LCCP) - Application of Social Responsibility codes

- 3.13 The Gambling Commission has issued 'Licence Conditions and Codes of Practice (LCCP)' under the Gambling Act 2005 which came into effect on 6th May 2018. These were a significant update on previous LCCP and are in three parts:
- General Conditions attached to operating licences
 - Principal Code of Practice: Social Responsibility provisions and Ordinary provisions
 - General Conditions attached to Personal Licences.
- 3.14 Haringey will expect all applicants to have considered the LCCP and included relevant parts within their application.
- 3.15 In particular, all non-remote licensees 'must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy' (Social responsibility (SR) code 10.1.1); and 11.4 Local risk assessments must be reviewed when there are significant changes in local circumstances (including those identified in a licensing authority's statement of licensing policy) or at the premises, or when applying for a new licence or variation of a licence (SR code 10.1.2).
- 3.16 Haringey may, at its discretion, add conditions from the Gambling Commission LCCPs to any applicants' licence as it sees fit.

3.17 Local Area Risk Assessments

- 3.18 Haringey is an improving progressive borough, however, as can be seen from the analysis provided under the local area profile, the east of the borough compares poorly with the west and experiences significant levels of deprivation that potentially puts people in those areas at risk to gambling related harm. From 6 April 2016, it is a requirement of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), under section 10 for licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at their premises and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in this policy.
- 3.19 The LCCP goes on to say licensees must review (and update as necessary) their local risk assessments if the application meets the following criteria:
1. to take account of significant changes in local circumstance, including those identified in this policy;
 2. When there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 3. When applying for a variation of a premises licence; and d. in any case, undertake a local risk assessment
 4. when applying for a new premises licence.
- 3.20 Guidance for operators on conducting the local area risk assessment
- 3.21 The council will expect the local risk assessment to consider the urban setting such as (but not limited to):
- The proximity of the premises to education establishment such as schools.
 - The commercial environment.
 - Factors affecting the footfall.
 - Whether the premises is in an area of deprivation.
 - Whether the premises is in an area subject to high levels of crime and/or disorder.
 - The ethnic profile of residents in the area.
 - The demographics of the area in relation to vulnerable groups.
 - The location of services for children such as schools, playgrounds, youth centres, toy shops, leisure centres and other areas where children will gather.
 - The range of facilities in the local area such as other gambling outlets, banks, payday loans, post offices, refreshment and entertainment type facilities.

- Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activity, etc.
 - The proximity to places of worship.
- 3.22 The local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected, measures include (but not limited to):
- The training of staff in intervention when customers show signs of excessive gambling, the ability of staff to offer intervention and how the manning of premises affects this.
 - Information held by the licensee regarding self-exclusion schemes and incidences of underage gambling.
 - Arrangements in place for local exchange of anonymised information and data regarding self-exclusion and gambling trends.
 - Gambling trends that may mirror financial payments such as pay days, pay day loans or benefit payments
- 3.23 Arrangements for monitoring and dealing with underage people and vulnerable people, which may include:
- dedicated and trained personnel,
 - leaflets and posters,
 - self-exclusion schemes,
 - window displays and advertisements designed to not entice children and vulnerable people.
 - The provision of signage and documents relating to game rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality.
 - The proximity of premises that may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, doctor surgeries, pharmacies, community hubs, addiction clinics or help centres, places where alcohol or drug dependent people may congregate.
- 3.24 The local risk assessment should show how children are to be protected:
- The proximity of institutions, places or areas where children and young people frequent such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas, etc.
 - The proximity of place where children congregate such as bus stops, cafes, shops.
 - Areas that are prone to issues of youths participating in anti-social behaviour, including activities such as graffiti, tagging, underage drinking etc.
- 3.25 Other matters that the assessment may include:
- Gambling premises Internal measures (but not limited to):
- Details as to the location and coverage of working CCTV cameras, and how the system will be monitored.
 - The layout of the premises so that staff have an unobstructed view of people using the premises and in particular the gaming machines and fixed odds betting terminals.
 - The number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those people using the premises.
 - Where the application is for a betting premises licence, other than in respect of a track, the location and extent of any part of the premises, which will be used to provide facilities for gambling in reliance on the licence.
 - Provisions to ensure the health and welfare of staff engaged in lone working.
- 3.26 Such information may be used to inform the decision the council makes about whether to grant the licence, to the licence with special conditions or to refuse the application.
- 3.27 This policy does not preclude any application being made and each application will be decided on its own merits, with the onus being upon the applicant to show how the concerns can be mitigated

3.28 Local Area Profile

- 3.29 A given location that gives rise to serious concerns of the impact of any further increase in the number of gambling premises in those most vulnerable and 'at risk' areas of the borough. This Authority considers that it is necessary to seek to control the number of facilities for gambling in areas where its most vulnerable residents may be placed at increasing risk, and in line with the duty, to aim to permit gambling insofar as it is reasonably consistent with the pursuit of the licensing objectives. All areas shown within the local area profile as being at high overall risk of gambling related harm, are generally considered inappropriate for further gambling establishments, which would tend to raise the risk of gambling related harm to vulnerable people living in those areas. Operators are asked to consider very carefully whether seeking to locate new premises or relocating existing premises within these areas would be consistent with the licensing objectives. Wherever the facilities are proposed, operators should consider, having regard to the individual mapping provided, each of the specific characteristics of their local area. Each premises' specific risk-assessment should recognise these and provide appropriate proactive mitigation or control measures.

- 3.30 The council is aware that demand issues (e.g. the likely demand or need for gambling facilities in an area) cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can. The council will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. With regards to these objectives, it is the council's policy, upon receipt of any relevant representations to look at specific location issues including:
- the possible impact a gambling premises may have on any premises that provide services to children or young people, i.e. a school, or vulnerable adult centres in the area;
 - the possible impact a gambling premises may have on residential areas where there may be a high concentration of families with children;
 - the size of the premises and the nature of the activities taking place;
 - any levels of organised crime in the area.
- 3.31 Assessment of risk covers the following:
- a. Identify risk factors
 - b. Who can be harmed and how
 - c. Evaluate the risk
 - d. Record and score findings
 - e. Monitor and review
- 3.32 Other matters that the assessment may include:
- local area crime statistics;
 - whether the premises is in an area of deprivation;
 - whether the premises is in an area subject to high levels of crime and/or disorder;
 - the demographics of the area in relation to vulnerable groups;
 - the location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather;
 - the training of staff to recognise child sexual exploitation and the steps to be taken if it is suspected;
 - details as to the location and coverage of working CCTV cameras, and how the system will be monitored;
 - the layout of the premises so that staff have an unobstructed view of persons using the premises;
 - the number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those persons using the premises;
 - arrangements for monitoring and dealing with under age persons and vulnerable, which may include dedicated and trained personnel, leaflets, posters, self-exclusion schemes, window displays and advertisements not to entice passers-by etc.;
 - the provision of signage and documents relating to games rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality;
 - where the application is for a betting premises licence, other than in respect of a track, the location and extent of any part of the premises which will be used to provide facilities for gambling in reliance on the licence;
 - the training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
- 3.33 Such information may be used to inform the decision the council makes about whether to grant the licence, to grant the licence with special conditions or to refuse the3.31application.
- 3.34 A good risk assessment accompanying an application will:
- Enable the licensing authority to see that the applicant has considered the community and the risks within it;
 - Provide greater clarity for operators leading to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application;
 - Enable the licensing authority to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge;
 - Encourage a proactive approach to risk that is likely to result in reduced compliance and enforcement action.
- 3.35 In any case the local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected.

- 3.36 There is evidence that some groups in the population may be more vulnerable to gambling related harm. This does not only apply to people on low incomes but also people who are less able to make reasoned decisions because of poor mental health or addiction. Children and young people may be particularly susceptible, as their youth and inexperience may make them more inclined to risk-taking behaviour and less able to manage the consequences of those decisions.
- 3.37 To help support applicants and licence holders to better understand their local environment, an analysis of gambling related harm has been prepared as a 'local area profile.' A copy of the document is provided at Appendix B. By drawing on relevant and reliable published socio-economic and public health data sets together with local police data concerning anti-social behaviour, the local area profile uses special analysis techniques to provide a model of area-based vulnerability to gambling related harm across the borough. Both current operators and potential new operators to the borough are asked to consider the detail provided carefully, and should have regard to both the overall summary map and the individual mapping provided in respect of each relevant data set.
- 3.38 This policy does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome. Assessing local risk should therefore provide a means for licensees to address local concerns about gambling premises; and for licensing authorities and gambling licensees to work collaboratively with a view to minimising risks, within the framework of aiming to permit gambling where reasonably consistent with licensing objectives.

3.39 Duplication with other regulatory regimes

- 3.40 The council will seek to avoid any duplication with other statutory/regulatory systems where possible, including Planning. The council will not consider whether a licence application is likely to be awarded planning permission or building regulations approval in its consideration of it. It will though, listen to, and consider carefully, any concerns about proposed conditions which are not able to be met by the applicant due to planning restrictions, should such a situation arise, this may include consideration of the proposed hours of operation. The Council will consider the hours proposed in accordance to the risk assessment and area profile.

3.41 Conditions

- 3.42 The Council is aware that the Secretary of State has set mandatory conditions and default conditions. The Gambling Commission has set Licence Conditions and Codes of Practice which are necessary for the general good conduct of gambling premises. The Council will not seek to impose further individual conditions in relation to matters that have already been dealt with, unless required due to matters within the risk assessment and or Local area profile.
- 3.43 Where there are specific risks or problems associated with a particular locality, or specific premises, or class of premises, the council will attach individual conditions to address this. Any conditions attached to a licence issued by the council will be proportionate and will be:
- relevant to the need to make the proposed building suitable as a gambling facility;
 - directly related to the premises and the type of licence applied for, and/or related to the area where the premises is based;
 - fairly and reasonably related to the scale, type and location of premises;
 - consistent with the licensing objectives, and
 - reasonable in all other respects.
- 3.44 Decisions about individual conditions will be made on a case-by-case basis, although there will be a number of control measures the council will consider using, such as supervision of entrances, supervision of adult gaming machines, appropriate signage for adult only areas etc. There are specific comments made in this regard under each of the licence types in this policy. The council will also expect the applicant to offer his/her own suggestions as to the way in which the licensing objectives can be met effectively.
- 3.45 Where certain measures are not already addressed by the mandatory/default conditions or by the applicant, the council may consider licence conditions to cover issues such as:
- proof of age schemes;
 - CCTV;

- supervision of entrances;
- supervision of machine areas;
- a reduction in the number of betting machines (betting premises);
- the staffing of premises;
- physical separation of areas;
- location of entrance points;
- notices / signage;
- specific opening hours;
- a requirement that children must be accompanied by an adult;
- enhanced CRB checks of the applicant and/or staff;
- support to persons with gambling addiction;
- policies to address seasonal periods where children may more frequently attempt to gain access to premises and gamble such as pre and post school hours, half terms and summer holidays;
- policies to address the problems associated with truant children who may attempt to gain access to premises and gamble;
- No on street promotional activity to encourage betting participation
- anyone or a combination of these measures.

3.46 This list is not mandatory or exhaustive and is merely indicative of examples of certain measures which may satisfy the requirements of the licensing authority and the responsible authorities, depending on the nature and location of the premises and the gambling facilities to be provided.

3.47 There are conditions which the council cannot attach to premises licences which are:

- any condition on the premises licence which makes it impossible for the applicant to comply with an operating licence condition;
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated) and
- conditions in relation to stakes, fees, winnings or prizes.

3.48 Door supervision

3.49 The council will consider whether there is a need for door supervision in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime. It is noted though that the Gambling Act 2005 has amended the Private Security Industry Act 2001 and that door supervisors at casinos or bingo premises are not required to be licensed by the Security Industry Authority. Where door supervisors are provided at these premises the operator should ensure that any persons employed in this capacity are fit and proper to carry out such duties. Possible ways to achieve this could be to carry out a criminal records (CRB) check on potential staff and for such personnel to have attended industry recognised training.

3.50 Adult gaming centres

3.51 Under the Act a premises holding an adult gaming centre licence will be able to make category B, C and D gaming machines available and no one under 18 will be permitted to enter such premises.

3.52 The council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling in these premises. The council will expect applicants to satisfy the authority that there will be sufficient measures to ensure that under 18-year-olds do not have access to the premises.

3.53 The Government plans to relax the ratio of gaming machines that will be permitted in Adult Gaming Centres. The intention is to amend the current gaming machine ratio to allow operators to make 2 Category B gaming machines available to a minimum of one Category C and D gaming machine. This will apply on a device type basis. This means, for example, that operators will be able to site 2 Category B cabinet gaming machines to a minimum of one Category C or D gaming machine. This would also apply for in-fill and tablet gaming machines. The ability to have cashless play at these machines are also being brought into effect. Gambling machines provide a form of gambling which is attractive to children and AGC's will contain machines of a similar format to the category D machines on which children are allowed to play. The pending changes mark a greater freedom in machine availability and also a vulnerable customers ability to use debit cards in situ without necessarily taking a break from the machine. The Licensing Authority will expect the applicant to satisfy it that there will be

sufficient measures to ensure that under 18-year-olds do not have access to the premises. Meaningful engagement from staff with customers to ensure they are not spending beyond their means will be essential. Measures and /licence conditions may cover issues such as:

- proof of age schemes
- CCTV
- Entry control system
- the numbers of staff on duty at any one time.
- door supervisors.
- supervision of entrances/machine areas.
- physical separation of areas.
- location of entry
- notices / signage/ no promotional activity in the public highway to encourage gambling
- specific opening hours
- self-barring schemes; or
- provision of information leaflets/helpline numbers for organisations such as GamCare

3.54 This list is not mandatory, nor exhaustive, and is merely indicative of the types of issues that measures/conditions should cover. Gaming machines provide opportunities for solitary play and immediate payouts and as such are likely to encourage repetitive and excessive play. Therefore, when considering premises licence applications which include gaming machines particular regard will be given to the licensing objective.

3.55 Licensed family entertainment centres (FECs)

3.56 Licensed family entertainment centres are those premises which usually provide a range of amusements such as computer games, penny pushers and may have a separate section set aside for adult only gaming machines with higher stakes and prizes. Licensed family entertainment centres will be able to make available unlimited category C and D machines where there is clear segregation in place so children do not access the areas where the category C machines are located.

3.57 Where category C or above machines are available in premises to which children are admitted then the council will ensure that:

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose, a rope, floor markings or similar provision will not suffice and the council may insist on a permanent barrier of at least 1 meter high;
- only adults are admitted to the area where the machines (category C) are located;
- access to the area where the machines are located is supervised at all times;
- the area where the machines are located is arranged so that it can be observed by staff; and
- at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

3.58 The council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling in these premises. The council will expect applicants to satisfy the authority that there will be sufficient measures to ensure that under 18-year-olds do not have access to the adult only gaming machine areas.

3.59 The council will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations.

3.60 The efficiency of such policies and procedures will each be considered on their merits, however, they may include:

- appropriate measures and training for staff as regards suspected truant children on the premises;
- measures and training covering how staff would deal with unsupervised very young children being on the premises;
- measures and training covering how staff would deal with children causing perceived problems on or around the premises;
- the arrangements for supervision of premises either by staff or the use of CCTV.

3.61 Any CCTV system installed should both the interior and the entrance working to the latest Home Office and ACPO

standards and to the satisfaction of Metropolitan Police and the local authority. The system must record images clearly and these recordings be retained for a minimum of 31 days. If the equipment is inoperative the police and local authority must be informed as soon as possible and immediate steps taken to make the system operative. Notices must be displayed at the entrances advising that CCTV is in operation.

- 3.62 Due to the nature of these premises, which are attractive to children, applicants who employ staff to supervise the premises should consult with the Independent Safeguarding Authority to determine if their staff need to be CRB checked.
- 3.63 The council will refer to the Commission's website to familiarise itself with any conditions apply to operating licences covering the way in which the area containing the category C machines should be delineated. The council will also make itself aware of the mandatory or default conditions and any Gambling Commission Codes of Practice on these premises licences.

3.64 Casinos

The London Borough of Haringey has passed a Nil resolution in relation to casinos, but it is noted that the Government has not awarded a casino licence to Haringey.

3.65 Bingo premises

There is no official definition for bingo in the Gambling Act 2005 however from a licensing point of view there is a category of premises licence specifically for bingo premises which is used by traditional commercial bingo halls for both cash and prize bingo. In addition, this premises licence will authorise the provision of a limited number of gaming machines in line with the provisions of the Act.

- 3.66 The council is aware that it is important that if children are allowed to enter premises licensed for bingo that they do not participate in gambling, other than on category D machines. Where category C or above machines are available in premises to which children are admitted then the council will ensure that:
- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose, a rope, floor markings or similar provision will not suffice and the council may insist on a permanent barrier of at least one meter high;
 - only adults are admitted to the area where the machines are located;
 - access to the area where the machines are located is supervised at all times;
 - the area where the machines are located is arranged so that it can be observed by staff;
 - at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18;
 - children will not be admitted to bingo premises unless accompanied by an adult.
- 3.67 The Gambling Commission has provided Guidance for Licensing Authorities and Licence Conditions and Code of Practice which are applied to Operator's Licences. The council will take this into consideration when determining licence applications for bingo premises.
- 3.68 Where certain measures are not already addressed by the mandatory/default conditions, the Gambling Commission Code of Practice or the applicant, the council may consider licence conditions to address such issues.

3.69 Betting premises

- 3.70 Betting premises are premises such as bookmakers where various types of gambling are authorised to take place. The Act contains a single class of licence for betting premises however within this single class there are different types of premises which require licensing such as high street bookmakers, bookmakers located in self-contained facilities at race courses as well as the general betting premises licences that track operators will require. The council will specifically have regard to the need to protect children and vulnerable people from harm or being exploited by gambling in these premises. The council will expect applicants to satisfy the authority there will be sufficient measures in place to ensure that under 18-year-olds do not have access to the premises

- 3.71 Betting Premises Licence (In Respect of Premises Other Than a Track)
- a) This type of licence allows premises (i.e., betting offices) to provide 'off course' betting i.e., betting that takes place other than at a track. There are also betting offices at tracks that have a separate premises licence from the track licence.
 - b) This section of the policy concentrates on 'off course' betting that takes place other than at a track and includes an entitlement to provide up to four gaming machines of category B2, B3, B4, C or D and any number of betting machines.
- 3.72 This Licensing Authority may, when appropriate, use its powers under Section 181 of the Act to restrict the number of betting machines (also known as bet receipt terminals), their nature and the circumstances in which they are made available at betting premises by imposing a licence condition.
- When considering whether such a condition should be imposed, the Licensing Authority will take into account:
- the size of the premises.
 - the number and location of the machines.
 - the number of counter positions available for person-to-person transactions, and
 - the numbers of, and ability of staff to monitor the licensed premises and prevent persons under the age of 18 from entering the premises.
- c) The Licensing Authority will expect the applicant to satisfy it that there will be sufficient measures to ensure that under 18-year-olds do not have access to the premises.
- 3.73 Appropriate measures / licence conditions may cover issues such as:
- proof of age schemes.
 - CCTV.
 - the numbers of staff on duty at any one time.
 - door supervisors.
 - supervision of entrances/machine areas.
 - physical separation of areas.
 - location of entry.
 - notices / signage.
 - specific opening hours.
 - self-barring schemes.
 - provision of information leaflets/helpline numbers for organisations such as GamCare.
- 3.74 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.
- d) There are particular concerns about the use of B2 Fixed Odds Betting Terminals (FOBTs).
- 3.75 We recognise that it is permissible for a betting operator to provide solely FOBTs as their allocation of gaming machines, the high prize, high stake gaming provided enables considerable sums of money to be spent in a very short period of time, 56 which increases the risk of gambling-related harm.
- 3.76 The applicant in each case will be expected to demonstrate that they can offer sufficient facilities for betting alongside any gaming machine provision.
- e) Where FOBTs are provided, these gaming machines shall be located within direct line sight of the supervised counter.
- 3.77 Information leaflets and posters shall be provided in close proximity to the location of any FOBTs. These should be aimed at customers/families/friends to provide information on how to identify signs of problem gambling and available pathways to advice and assistance (e.g., helpline numbers and online counselling services)
- f) Where the local area profile identifies any relevant local risk of gambling-related harm, operators may consider additional protections for the vulnerable.
- 3.78 This might include:
- Removing Automated Teller Machines (ATM's) from the betting office
 - Restricting FOBTs to account-based play
- g) Licensed betting premises are only permitted to offer gambling facilities between 0700 and 2200 hours unless the local authority has agreed an extension of operating hours.
- 3.79 We recognise that longer operating hours may attract more vulnerable people, such as those who may be intoxicated or have gambling addictions. Therefore, this Authority is unlikely to grant any extension of operating hours unless it is satisfied that robust measures will be undertaken to protect the vulnerable.
- h) Children and young persons are not permitted to enter licenced betting premises.

3.80 Social Responsibility (SR) Code 3.2.7(3) in the licence Conditions and Codes of Practice (LCCP) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling.

- i) As per the Commission's Guidance we will consider restricting the number and location of betting machines in respect of applications for betting premises licences.

3.81 When considering the number, nature, and circumstances of betting machines an operator wants to offer, the Commission's Guidance will be followed and take into account the size of the premises, the number of counter positions available for person to-person transactions and the ability of the staff to monitor the use of machines.

- j) This Authority will have regard to the local area profile set out in Section 5 of this policy and to the risk assessment compiled in response to it.

3.82 Tracks

3.83 The potential space for betting machines at a track may be considerable, bringing with it significant problems in relation to:

- the proliferation of such machines.
- the ability of track staff to supervise the machines if they are scattered around the track; and
- preventing persons under the age of 18 from being able to use the machines.

3.84 This Licensing Authority will, when appropriate, use its powers under Section 181 of the Act to restrict the number of betting machines (also known as bet receipt terminals), their nature and the circumstances in which they are made available at a betting premises by attaching a licence condition to a betting premises licence. When considering whether such a condition should be imposed, the Licensing Authority will take into account the:

- size of the premises;
- number and location of the machines.
- number of counter positions available for person-to-person transactions; and
- ability of staff to monitor the licensed premises and prevent persons under the age of 18 from using the machines.

3.85 Condition on rules being displayed at tracks.

- a) The Licensing Authority will attach a condition to track premises licences requiring the track operator to ensure that the rules are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public. For example, the rules could be printed in the race-card or made available in leaflet form from the track office.

3.86 Applications and plans for tracks.

- a) Applicants must comply with any relevant regulations or guidance issued by the Gambling Commission in relation to applications for tracks. Applicants must ensure that the Licensing Authority is made completely aware of what it is being asked to licence.
- b) The information submitted with the application must include detailed plans for the racetrack itself and the area that will be used for temporary "on-course" betting facilities (often known as the "betting ring"). In the case of:
 - dog tracks and horse racecourses
 - fixed and mobile pool betting facilities operated by the Tote or track operator; and
 - other proposed gambling facilities.
- c) The plans should make clear what is being sought for authorisation under the track betting premises licence. It must also be made clear what, if any, other areas are to be subject to a separate application for a different type of premises licence.
- d) Unless there is a compelling reason to not do so, the Licensing Authority will require all self-contained premises operated by off-course betting operators on track to be the subject of separate premises licences.

3.87 This will ensure that there is clarity between the respective responsibilities of the track operator and the off-course betting operator running a self-contained unit on the premises.

3.88 Travelling fairs

3.89 Travelling fairs have traditionally been able to provide various types of low stake gambling without the need for a licence. Travelling fairs (as defined in the Act, and in respect of fairs which are 'wholly or principally' providing

amusements) may provide an unlimited number of Category D gaming machines and equal chance prize gaming without the need for any authorisation from the Licensing Authority, provided that such facilities amount to no more than an ancillary amusement at the fair.

- 3.90 There is a 27-day per calendar year statutory limit for a piece of land being used as a fair, and this regardless of whether it is the same or different travelling fairs using the land. The Licensing Authority will work with its neighbouring authorities to ensure that land that crosses our boundaries are monitored so that the statutory limits are not exceeded.

3.91 Provisional statements

- 3.92 Application for a provisional statement can be made for premises that an applicant expects to be constructed or to be altered or expects to acquire the right to occupy. Representations can be made against an application for a provisional statement in the same manner as for a premises licence. The process for considering an application for a provisional statement is the same as that for premises licences (with the exception that an applicant need not have the right to occupy the premises and need not have an operating licence).

- 3.93 Once the premises have been constructed, altered, or acquired by the holder of a provisional statement, they can put in an application for the necessary premises licence. If a provisional statement has been granted, the Licensing Authority is constrained in the matters it can consider when an application for a premises licence is subsequently made in relation to the same premises.

- 3.94 No further representations from relevant authorities or interested parties. can be taken into account in relation to the premises licence application unless they concern matters which could not have been addressed at the provisional statement stage, or they reflect a change in the applicant's circumstances. In addition, the Licensing Authority may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- which could not have been raised by way of representations at the provisional licence stage, or
- which, in the authority's opinion, reflect a change in the operator's circumstances, or
- where the premises has not been constructed in accordance with the plan and
- information submitted with the provisional statement application.

This must be a substantial change to the plan and the Licensing Authority will discuss any concerns they have with the applicant before making a decision. Section 210 of the Act (which applies to premises licences and provisional statements) makes it clear that a Licensing Authority must not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with planning or building law.

3.95 Reviews

- 3.96 A premises licence may be reviewed by the licensing authority of its own volition or following the receipt of an application for a review from interested party or responsible authority. A formal review of a premises licence may result in the Licensing Authority imposing additional conditions or revoking the licence.

- 3.97 Initiation of review by Licensing Authority

- The Licensing Authority may initiate a review in relation to a particular class of premises licence or in relation to particular premises. Whilst officers may be involved in the initial investigations of complaints
- leading to a review or may (at their discretion) try informal mediation or dispute resolution techniques
- prior to a review being initiated, the review itself must be heard and determined by Licensing Committee or one of its Sub-Committees.
- In relation to a class of premises, the Licensing Authority may review the use made of premises and, in particular, the arrangements that premises licence general reviews, the Licensing Authority will most likely
- be acting as a result of specific concerns or complaints about particular types of premises, which would cause them to want, for example, to look at the default conditions that apply to that category of licence
- In relation to particular premises, the Licensing Authority may review any matter connected with the use made of the premises if it has reason to suspect that premises licence conditions are not being observed,
- or for any other reason (such as a complaint from a third party) which gives them cause to believe that a
- review may be appropriate.

- 3.98 Application for review by responsible authorities and interested parties Whilst, requests for a review of a premises licence can be made by interested parties or responsible authorities, it is for the Licensing Authority to decide whether the review is to be carried out. However, the Licensing Authority recognises that its decision to carry out a review must not amount to prejudging the outcome of the review.
- 3.99 An application for a review may be rejected if the Licensing Authority thinks that the grounds on which the review is sought:
- are not relevant to the principles that must be applied by the Licensing Authority in accordance with section 153 of the Act. If the application raises issues that are not relevant to the current Commission guidance, current codes of practice, this Policy statement, or the licensing objectives, then the Licensing Authority may reject it. In addition, if the application raises general objections to gambling as an activity, that is likely to be irrelevant to the principles in section 153, given that the Authority is required to permit the use of premises for gambling in so far as we think that permission is in accordance with the matters set out in that section. Examples that are likely to be irrelevant include demand for gambling premises, issues relating to planning, public safety, and traffic congestion.
 - that the grounds are frivolous.
 - that the grounds are vexatious.
 - that the grounds “will certainly not” cause the authority to revoke or suspend a licence or remove, amend, or attach conditions on the premises licence.
 - are substantially the same as the grounds cited in a previous application for review relating to the same premises. In these circumstances we will take into account how much time has passed since the earlier application in reaching a judgement about whether it is reasonable to rely on this as a reason not to review the licence; or
 - are substantially the same as representations made at the time the application for a premises licence was considered. In these circumstances the Licensing Authority will take into account the period of time that has passed since the representations were made, but the underlying requirement is that the Licensing Authority should not review the licence on the basis of the same arguments considered on the grant of the premises licence.
- 3.100 The matters which will generally be considered relevant for any review are:
- any relevant current code of practice issued by the Commission
 - any relevant current guidance issued by the Commission.
 - the licensing objectives.
 - the Council’s Statement of Gambling Principles, and
 - The Gambling Act 2005 and the regulations made
- 3.101 Once the review has been completed, the licensing authority must, as soon as possible, notify its decision to:
- the licence holder.
 - the applicant for review (if any).
 - the Commission.
 - any person who made representations.
 - the Chief Officer of Police or Chief Constable; and
 - His Majesty’s Commissioners for Revenue and Customs
- 3.102 There is a right of appeal against the Council’s decision.
- 3.103 Rights of appeal and judicial review
- 3.104 The Council is required by law to give reasons for a rejection of an application, but it is also good practice for it to give reasons for all decisions. Failure to give reasons may result in an appeal of the decision or the suggestion that the Council did not have regard to all the relevant information when making its decision, in line with its obligation under s.153 of the Act. It is particularly important that reasons should reflect the extent to which the decision has been made with regard to the licensing authority’s policy statement and this Guidance. Reasons for decisions should be made available to all of the parties of any process. The Council’s decision may be subject to judicial review. Details relating to appeals against decisions by a licensing authority are set out in s.206 - 209 of the Act.

Chapter 4 - Permits, notices and lottery registrations.

4.1 Temporary use notices (TUN)

- 4.2 A TUN allows the use of premises for gambling where there is no premises licence but where a licensed operator wishes to use the premises temporarily for providing facilities for gambling. The type of premises that

might be suitable for a Temporary Use Notice could include hotels, conference centres and sporting venues. The Licensing Authority can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e., a non-remote casino operating licence. The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices, and at the time of writing this Statement the relevant regulations (SI no 3157: The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that Temporary Use Notices can only be used to permit the provision of facilities of equal chance gaming, where the gaming is intended to produce a single winner, which in practice means poker tournaments, dominoes, backgammon, mah-jong or bingo. There are a number of statutory limits as regards temporary use notices. Gambling Commission Guidance is noted that "The meaning of "premises" in Part 8 of the Act is discussed in Part 7 of the Commission's guidance. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place". In considering whether a place falls within the definition of "a set of premises", the licensing authority will need to look at, amongst other things, the ownership/occupation and control of the premises.

4.3 The holder of an operating licence must give notice to the licensing authority in whose area the premises are situated. The Secretary of State has prescribed the form of the notice which must specify information including:

- the type of gaming to be carried on.
- the premises where it will take place.
- the dates and times the gaming will take place.
- any periods during the previous 12 months that a TUN has had effect for the same premises
- the date on which the notice is given.
- the nature of the event itself.

4.4 This Council expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises as recommended in the Commission's Guidance to Licensing Authorities.

4.5 Appeals

4.6 An appeal against the Licensing Authority's decision may be made by the applicant, or any person entitled to receive a copy of the TUN, to the Magistrates' court within 14 days of receiving notice of the authority's decision. There is a further right of appeal to the High Court or Court of Session on a point of law.

4.7 Occasional use notices

4.8 An occasional use notice permits licensed betting operators to use tracks for betting on eight days or fewer in a calendar year, where the event is of a temporary nature. Betting may therefore be permitted by an occasional use notice without the need for a full premises licence. The licensing authority has very little discretion regarding these notices besides ensuring that the statutory limit of eight days a year is not exceeded. This licensing authority will consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

4.9 Tracks are usually regarded as permanent racecourses, but the meaning of track not only covers horse racecourses or dog tracks, but also any other premises on any part of which a race or other sporting event takes place. Although the track need not be a permanent fixture, land used temporarily as a track providing races or sporting events may qualify.

4.10 Gaming machines

4.11 Gaming machines cover all types of machines on which people can gamble, subject to a few exemptions. The Act sets out the categories of gaming machine and the number of such machines that may be permitted in each

type of gambling premises. There are four categories of gaming machine: categories A, B, C and D with category B divided into a further five subcategories.

- 4.12 There is a minimum age of 18 for all players for all category A, C and C machines. There is no minimum age for players of category D machines. The holder of any permit must comply with the codes of practice issued by the Commission on the location of and access to gaming machines by children and young persons, and the separation from category C and B machines where those are also located on the same premises.

4.13 Permits

- 4.14 Licensing Authorities may issue a range of permits for gambling which are designed as a light touch approach to low level ancillary gambling. They are used where stakes and prizes are subject to very low limits and/or gambling is not the main function of the premises. As a Licensing Authority, this Council may only grant or reject an application for a permit. It may not attach any conditions to the permit.
- 4.15 Holders of alcohol-licensed premises gaming machine permits, and club permits are required to comply with the Commission's codes of practice on the location and operation of machines. Licensing Authorities may issue the following permits:
- Family entertainment centre gaming machine permits
 - Club gaming permits and club machine permits.
 - Alcohol-licensed premises gaming machine permits.
 - Prize gaming permits.

4.16 Unlicensed Family Entertainment Centre

- 4.17 Where a premise does not hold a premises licence but wishes to provide gaming machines, it may apply to the Licensing Authority for this permit. The applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (section 238 of the Act).
- 4.18 The Act enables a Licensing Authority to prepare a statement of principles which it proposes to consider when determining the suitability of an applicant for a permit. In preparing this statement and/or considering applications it may have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission. The Commission's guidance advises that given that the premises is likely to appeal particularly to children and young persons, licensing authorities may wish to give weight to child protection issues.
- 4.19 The council may only grant a permit if it is satisfied that the premises will be used as an unlicensed FEC, and if the chief officer of police has been consulted on the application. The Council cannot attach conditions to this type of permit but may ask applicants to demonstrate:
- a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs.
 - that the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act).
 - that staff are trained to have a full understanding of the maximum stakes and prizes (24.7).
 - appropriate measures/training for staff regarding suspected truant school children on the premises; and
 - measures/training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on or around the premises.

4.20 Club Gaming and Club Machines Permits

- 4.21 Members Clubs and Miners' welfare institutes (but not Commercial Clubs) may apply for a Club Gaming Permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set out in forthcoming regulations.
- 4.22 Members Clubs, Miner's welfare institutes and Commercial Clubs may apply for a Club Machine Permit. A Club Machine permit will enable the premises to provide gaming machines (3 machines of categories B, C or D). NB Commercial Clubs may not site category B3A gaming machines offering lottery games in their club.

- 4.23 The Commission's Guidance states: "Members clubs must have at least 25 members and be established and conducted wholly or mainly for purposes other than gaming, unless the gaming is permitted by separate regulations". The Secretary of State has made regulation and these cover bridge and whist clubs, which replicates the position under the Gambling Act 1968. A members' club must be permanent in nature, not established to make commercial profit, and controlled by its members equally. Examples include working men's clubs, branches of Royal British Legion and clubs with political affiliations.
- 4.24 There is a fast-track procedure which prevents objections to be made by the Commission or the police and reduces the grounds on which an authority can refuse a permit. The grounds for refusal are:
- that the club is established primarily for gaming, other than gaming prescribed under schedule 12
 - that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
 - that a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled.
- 4.25 The Council may refuse an application on the grounds that:
- the applicant does not fulfil the requirements for a members' club or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied.
 - the applicant's premises are used wholly or mainly by children and/or young persons.
 - an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities.
 - a permit held by the applicant has been cancelled in the previous 10 years.
 - an objection has been lodged by the Commission or the Police.
- 4.26 There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

4.27 Premises licensed to sell alcohol

- 4.28 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises to have 2 gaming machines of categories C and/or D. The premises merely need to notify the Licensing Authority. This local authority expects all licensees to adhere to the:
- Code of Practice for gaming machines in alcohol licenced premises
 - Code of Practice for equal chance gaming in alcohol licensed premises.
- 4.29 The Licensing Authority can remove the automatic authorisation in respect of any particular premises if:
- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives.
 - gaming has taken place on the premises that breaches a condition of section 282 of the Act (i.e., that written notice has been provided to the Licensing Authority that a fee has been provided and that any relevant code of practice issued by the Commission about the location and operation of the machine has been complied with);
 - the premises are mainly used for gaming; or
 - an offence under the Gambling Act has been committed on the premises.
- 4.30 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the Licensing Authority must consider that application based upon the licensing objectives and any guidance issued by the Commission under S.25 of the Gambling Act 2005 and any other relevant matters. This Licensing Authority considers that such matters will be decided on a case-by-case basis but will consider the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18s do not have access to the adult-only gaming machines. Measures which will satisfy the authority will include that the adult machines be in direct sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage shall be used with regards to age restriction. Applicants shall provide information leaflets/helpline numbers for organisations such as GamCare.
- 4.31 The council can decide to grant the permit with a smaller number of machines and/or a different category of machines than that applied for. Conditions other than these cannot be attached.

4.32 Prize gaming permits

Section 288 defines gaming as prize gaming if the nature and size of the prize is not determined by the number of people playing or the amount paid for or raised by the gaming. The prizes will be determined by the operator before play commences. Prize gaming can often be seen at seaside resorts in amusement arcades where a form

of bingo is offered and the prizes are displayed on the walls. A prize gaming permit is a permit issued by the licensing authority to authorise the provision of facilities for gaming with prizes on specified premises.

4.33 In making its decision on an application for this permit the Licensing Authority does not need to but may, have regard to the licensing objectives but must have regard to any guidance from the Commission. (Gambling Act 2005, Schedule 14 paragraph 8(3)). The permit holder must comply with the relevant conditions in the Act, but that the Licensing Authority cannot attach conditions. The conditions in the Act are:

- the limits on participation fees, as set out in regulations, must be complied with.
- all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day.
- the game must be played and completed on the day the chances are allocated; the result of the game must be made public in the premises on the day that it is played.
- the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if nonmonetary prize); and
- participation in the gaming must not entitle the player to take part in any other gambling

4.34 The permit will have effect for ten years, unless it ceases to have effect, lapses, or is renewed. There is no annual fee for prize gaming permits. 10.8.6 An application for renewal of a permit must be made during the period beginning six months before the permit expires and ending two months before it expires. A permit will be still valid pending renewal including an appeal against a decision not to renew. The permit must be kept on the premises, and it is an offence not to produce it when requested to do so by a constable, an enforcement officer, or an authorised local authority officer. There is a right of appeal against a decision not to grant or renew a permit.

4.35 Small society lottery registrations

4.36 A lottery generally refers to schemes under which prizes are distributed by chance among entrants who have given some form of value for their chance to take part.

4.37 The Act creates two principal classes of lotteries: Licensed lotteries and exempt lotteries. Licensed lotteries are large society lotteries and lotteries run for the benefit of local authorities. These will be regulated by the Gambling Commission. Within the class of exempt lotteries there are four sub classes, one of which is small society lotteries.

4.38 A small society lottery is a lottery promoted on behalf of a non-commercial society as defined in the Act which also meets specific financial requirements set out in the Act. These will be administered by the council for small societies who have a principal office in Haringey and want to run such lottery.

4.39 A lottery is small if the total value of tickets put on sale in a single lottery is £20,000 or less and the aggregate value of the tickets put on sale in a calendar year is £250,000 or less.

4.40 To be 'non-commercial' a society must be established and conducted:

- for charitable purposes;
- for the purpose of enabling participation in, or supporting, sport, athletics or a cultural activity; or
- for any other non-commercial purpose other than that of private gain.

4.41 The other types of exempt lotteries are 'incidental non-commercial lotteries', 'private lotteries' and 'customer lotteries'. If you require guidance on the different categories of lotteries please contact the council.

4.42 The National lottery is not licensed by the Gambling Act 2005 and continues to be regulated by the National Lottery Commission under the National Lottery Act 1993.

Chapter 5 Compliance and Enforcement Matters

5.1 Enforcement

The council will work closely with the responsible authorities in accordance with a locally established joint enforcement protocol and will aim to promote the licensing objectives by targeting known high risk premises following government guidance around better regulation. Specifically the council is subject to the Regulators' Code which provides the following six provisions which the Council should follow in its enforcement activities, unless it concludes, because of material evidence, that a specific provision of the Code is either not applicable or outweighed by another relevant consideration

1. Regulators should carry out their activities in a way that supports those they regulate to comply and grow
2. Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views
3. Regulators should base their regulatory activities on risk
4. Regulators should share information about compliance and risk
5. Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply
6. Regulators should ensure that their approach to their regulatory activities is transparent

5.2 In carrying out its enforcement duties with regards to the inspection of premises; and the powers to institute criminal proceedings in respect of certain offences under the Act the council will endeavour to be:

- **proportionate:** regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised;
- **accountable:** regulators must be able to justify decisions, and be subject to public scrutiny;
- **consistent:** rules and standards must be joined up and implemented fairly;
- **transparent:** regulators should be open, and keep regulations simple and user friendly; and
- **targeted:** regulation should be focused on the problem, and minimise side effects

5.3 The council will endeavour to avoid duplication with other regulatory regimes so far as possible.

5.4 Where there is a Primary Authority scheme in place, the council will seek guidance from the Primary Authority before taking any action involving test purchasing operations, unless these arise as a result of a complaint.

5.5 Further information, including an index of all Primary Authority arrangements can be found at <https://primaryauthorityregister.info/par/index.php/home>

5.6 The council will also adopt a risk-based inspection programme in line with government recommendations around better regulation and the principles of the Hampton Review.

5.7 The main enforcement and compliance role for the council in terms of the Gambling Act 2005 will be to ensure compliance with the premises licences and other permissions which it authorises. The Gambling Commission will be the enforcement body for the operator and personal licences. Concerns about the manufacture, supply or repair of gaming machines will not be dealt with by the council but will be notified to the Gambling Commission. In circumstances where the council believes a premises requires a premises licence for gambling activities and no such licence is in force, the council will alert the Gambling Commission.

5.8 The Gambling Commission have highlighted that local authorities in general are likely to receive very few, or no complaints about gambling. Unlike other regulated areas, such as alcohol, gambling is much less visible as a concern for residents. As a result, the Gambling Commission advises the Council to proactively conduct inspections, to build up the picture of whether a premises can establish true compliance, and can assess whether the necessary protections, especially for the young and vulnerable are in place and working effectively.

5.9 The Council's Inspection programme requires all new licensed premises to be inspected shortly after the licence has been issued, and every premises should expect at least one inspection per year. Inspections of premises are also undertaken if complaints are received, if variation applications are received or there is some other intelligence that suggests an inspection is appropriate. Compliance will be checked in a daytime or evening inspection. Where a one-off event takes place under a Temporary Use Notice or Occasional Use Notice, the Council may also carry out inspections to ensure the Licensing Objectives are being promoted.

5.10 High-risk premises are those premises that have a history of complaints, a history of non-compliance and require greater attention. The Council will operate a lighter touch in respect of low-risk premises so that resources are more effectively targeted to problem premises. We will also target enforcement towards illegal gambling as it is potentially higher risk/harm due to the lack of regulation. The council will also keep itself informed of developments as regards the work of the Better Regulation Executive in its consideration of the regulatory functions of local authorities. The council's enforcement/compliance protocols/written agreements will be available upon request.

5.11 Legislation, Policies and Strategies

- 5.12 In undertaking its licensing function under the Gambling Act 2005, the Council is also bound by other legislation including: -
1. Section 17 of the Crime and Disorder Act 1988;
 2. Human Rights Act 1998;
 3. Health and Safety at Work Act 1974;
 4. Environmental Protection Act 1990;
 5. The Anti-Social Behaviour Act 2014;
 6. The Equality Act
- 5.13 However, the policy is not intended to duplicate existing legislation and regulation regimes that already place obligations on employers and operators.

5.14 National Strategies

- 5.16 The Council will also seek to discharge its responsibilities identified by other Government Strategies, in so far as they impact on the objectives of the licensing function.

5.17 Decision Making

5.18 Committee Terms of Reference

- 5.19 Licensing Sub-Committee of Councillors will sit to hear applications where representations have been received from interested parties and responsible authorities. Ward Councillors will not sit on a Sub-Committee involving an application within their ward.

5.20 The Licensing Committee

- 5.21 The Licensing Committee will also sit to determine general licensing matters that have been delegated to it by the full Council that are not associated with the Gambling Act 2005. Where a Councillor who is a member of the Licensing Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision making process affecting the licence in question.
- 5.22 The Licensing Sub-Committee will also refer to the Licensing Committee any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it. The Licensing Committee will refer to the Full Council any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it.
- 5.23 Every determination of a licensing decision by the Licensing Committee or a Licensing Sub-Committee shall be accompanied by clear, cogent reasons for the decision. The decision and the reasons for that decision will be sent to the applicant and those who have made relevant representations as soon as practicable. A summary of the decision shall also be posted on the Council's website as soon as possible after the decision has been confirmed, where it will form part of the statutory licensing register required to be kept by the Council.
- 5.24 The Council's Licensing Officers will deal with all other licensing applications where either no representations have been received, or where representations are irrelevant, frivolous or vexatious will be made by Council Officers, who will make the decisions on whether representations or applications for licence reviews should be referred to the Licensing Committee or Sub-Committee. Where representations are rejected, the person making that representation will be given written reasons as to why that is the case. There is no right of appeal against a determination that representations are not admissible.

5.25 Allocation of Decision-Making Responsibilities

- 5.26 The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them. Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process; the Committee has delegated certain decisions and functions and as

established a Sub-Committee to deal with them. Many of the decisions and functions will be purely administrative in nature and the grant of non-contentious applications, including for example those licences and permits where no representations have been made, will be delegated to Council Officers.

The table shown at Appendix A sets out the agreed delegation of decisions and functions to Licensing Committee, Sub-Committee and Officers. This form of delegation is without prejudice to Officers referring an application to a Sub-Committee or Full Committee if considered appropriate in the circumstances of any particular case.

5.27 Diversity and Equality

5.28 Subject to the general requirements of the Gambling Act, the Licensing Authority will Promote equality of opportunity between people who share a protected characteristic and those who do not. In such respects, nothing within this statement of licensing principles shall undermine the right of any individual to apply for any of the licences and/or authorisations provided under the terms of the Act. The Council is aware that some applications may have greater impact on groups, organisations or associations in respect of their race, gender, age, disability, sexuality or religious beliefs. With a view to eliminating unlawful discrimination, applicants will be expected (where appropriate) to address these concerns. Where applications made by these groups or organisations representing them highlight special needs or customs that may affect their application, the Council, in recognising its duty to promote good relations between persons of different groups, will give consideration to supporting those needs or customs whilst seeking to promote the three licensing objectives.

5.29 Human Rights

5.30 The Human Rights Act 1998 incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way that is incompatible with a Convention Right. The Council will have particular regard to its rights and responsibilities under the Human Rights Act 1998 when determining applications, considering enforcement and reviewing this policy.

5.31 The Council will have particular regard to:

- Article 6 – that in determination of civil rights everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law;
- Article 8 – that everyone has the right to respect for his home and private life (removal or restriction of a licence may effect a person's private life); and
- Article 1 of the First Protocol – that every person is entitled to peaceful enjoyment of his or her possessions (a licence is considered a possession in law);

5.32 Contact

5.33 The Licensing Service
4th Floor Alexandra House
Station Road
Wood Green
London
N22 8HQ

TABLE OF DELEGATIONS OF LICENSING FUNCTIONS

APPENDIX 1

MATTER TO BE DEALT WITH	FULL COUNCIL	SUB-COMMITTEE	OFFICERS
Three-year licensing policy	X		
Policy not to permit casinos	X		
Fee Setting - when appropriate		Can only be delegated to a sub-committee, not officers	

Application for premises licences		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a variation to a licence		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a transfer of a licence		Where representations have been received from the Commission	Where no representations received from the Commission
Application for a provisional statement		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Review of a premises licence			The initial grounds for review will be for officers to validate. Licensing Sub Committee will then hear the review if the grounds are valid under s.198
Application for club gaming /club machine permits		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Cancellation of club gaming/ club machine permits			Cancellation of club gaming /machine permits and other permits decisions would be appropriate for officers.
Applications for other permits			Dealt with by officers
Cancellation of licensed premises gaming machine permits			Dealt with by officers
Consideration of temporary use notice		X	
Decision to give a counter notice to a temporary use notice			

Definitions

NOTE: In this Policy, the following definitions are included to provide an explanation to certain terms included in the Act and, therefore, in the Statement of Gambling Policy. In some cases, they are an abbreviation of what is stated in the Gambling Act 2005 or an interpretation of those terms. For a full definition of the terms used, the reader must refer to the Gambling Act 2005.

‘The Council’ means London Borough of Haringey, acting as the Licensing Authority as defined by the Gambling Act 2005.

‘The Act’ means the Gambling Act 2005.

Betting facilities means - Betting shops, Adult Gaming Centres, FECs, Bingo Premises, Track Betting Premises.

'The Licensing Authority' the authority in whose area the premises is wholly/partly situated. The Licensing Authority (as in the issuing authority) is also a responsible authority.

'The Gambling Commission' a body set up by the Government as the unified regulator for gambling, replacing the Gaming Board.

'Responsible Authority' means a public body that must be notified of certain applications for premises licences and permits, and are entitled to make representations on any of the licensing objectives.

'Children' means individuals who are less than 16 years old.

'Young person' means individuals who are aged less than 18 years old and 16 years and over.

'Mandatory Conditions' means a specified condition provided by regulations to be attached to premises licences.

'Default Conditions' means a specified condition provided for by regulations to be attached to a licence unless excluded by the Council.

'Premises' means any place, including a vessel or moveable structure.

'LCCP' Licensing Conditions Code of Practice issued by the Gambling Commission

This page is intentionally left blank



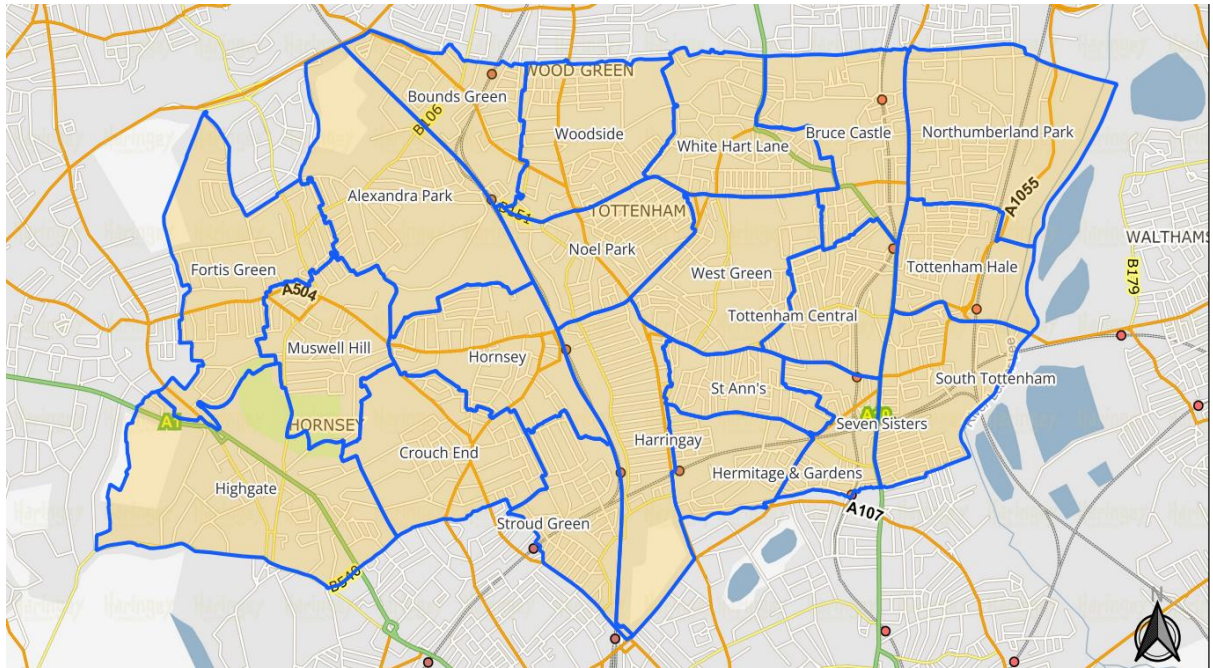
**GAMBLING ACT 2005
GAMBLING LOCAL AREA PROFILE
JANUARY 2025**

Introduction

1. This profile is published by Haringey Council as part of its role under the Gambling Act 2005 to assist holders of premises licences produce their local risk assessments required under the Gambling Commission's Social Responsibility Code provisions of the its Licence Conditions and Codes of Practise.
2. Risk assessments are to help operators further the statutory licensing objectives of:
 - preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
 - ensuring that gambling is conducted in a fair and open way, and
 - protecting children and other vulnerable persons from being harmed or exploited by gambling
3. Our definition of vulnerable persons mirrors that of the Commission in that they are:
 - people who gamble more than they want to
 - people who gamble beyond their means; and/or
 - people who may not be able to make informed or balanced decisions about gambling, for example because of mental health problems, learning disabilities, or substance misuse relating to alcohol or drugs.
4. However, for some, gambling can be problematic, affecting their ability to live and work. People with gambling problems often experience a range of negative effects, including health issues, relationship breakdown, and difficulties with debt. In more severe cases gambling problems can lead to crime, thoughts of suicide or suicide itself.
5. The Gambling Commission recommend, that as part of any policy refresh, which licensing authorities are required to do every three years, that authorities also produce a Local Area Profile. This document is to highlight areas of the borough inhabited or frequented by people who might be at risk of being harmed or exploited by gambling. Betting operators have a specific responsibility to assess local risks to the licensing objectives that come about due to the provision of gambling facilities at each of their premises. Whilst it is not a requirement for licensing authorities to complete a risk assessment of the local area, it is encouraged by the Gambling Commission that such risk assessments, known as the local area profile are a significant benefit to both the licensing authority and the operators. The Commission explains that this will have a number benefits for policy making in the future, including:
 - Enabling licensing authorities to better serve their local community, by improving Haringey's understanding of the community and the local risk profile;
 - Improved clarity for operators as to the relevant factors in licensing authority decision making. This will lead to improved premises license applications, with the potential operator already incorporating controls and measures to mitigate risk in their application;
 - Enabling licensing authorities to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge; and
 - Encouraging a proactive approach to risk that is likely to result in better compliance and reduced enforcement action.

6. The Borough of Haringey

- 6.1 Haringey is one of London's 32 Boroughs. It is located in the north of the capital and is more than 11 square miles in area. According to the 2021 Census nearly half of its 264,300 people come from ethnic minority backgrounds. It is often said that Haringey is an outer London Borough with inner London challenges.



Map of the London borough of Haringey

- 6.2 Haringey is a vibrant place to live, with many different cultures mixing, and a fantastic variety of characterful High Streets – from the metropolitan centre at Wood Green to the boutiques and restaurants of Muswell Hill and Crouch End – creating a strong sense of local pride.
- 6.3 There are approximately 100,000 dwellings and approximately 8,200 businesses employing 64,700 people. The most recent indices of multiple deprivation (IMD) (2019) show that Haringey is one of the most deprived authorities in the country, ranking 49th out of 326 authorities, and it is ranked 4th in London, yet it is also a borough of contrasts, with great prosperity and affluence in some communities.
- 6.4 Persistent inequalities are manifest in the health and wellbeing of our residents. The life expectancy gap between the most and least deprived wards is 7 years for men and 3 years for women. The borough is facing an obesity crisis with 1 in 4 reception aged children, and 1 in 3 10/11 year olds, measured as overweight or obese. The number of people with long term conditions like diabetes and heart disease is increasing and there are approximately 4,000 adults with severe mental illnesses – three times more than would be expected, even given Haringey's level of deprivation.
- 6.5 There are also inequalities in educational achievement, access to employment

and housing quality. The borough has seen twelve consecutive years of improvement in GCSE performance and A-levels scores, making Haringey one of the top 3 most improved areas. Yet too many of our young people still leave school without the skills needed to secure sustainable employment, blocking their access to one of the world's most dynamic economies at their doorstep.

- 6.6 The Council's response to these challenges is to meet them head on with ambition, innovation and a commitment to work ever more closely with residents, businesses and public sector partners. Nowhere is our ambition greater than in our most deprived communities in Tottenham. We are determined that regeneration will be shaped by the views of residents.

7. The Haringey Approach

- 7.1 The purpose of the Haringey Local Area Profile is to identify the areas' most vulnerable to gambling related harm. Therefore, the question that this profile attempts to better understand is – who is vulnerable to, or at risk of, gambling-related harm and where are such vulnerabilities likely to manifest in Haringey?
- 7.2 Gambling related harm was defined by the Gambling Commission in their 'Measuring Gambling Related Harms – A Framework for Action' report, published in July 2018: *"Gambling-related harms are the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society"*
- 7.3 The Gambling Commission in 2012, whilst stating that it would not explicitly define who exactly is vulnerable in relation to gambling, could identify types of people that it is likely to impact more than others. This focuses on people who gamble more than they would want to, some examples include:
- Young people and students
 - Those with Mental Health problems
 - Those afflicted with substance use/misuse issues
 - Those with learning disabilities / difficulties
 - Homeless people
 - Those living in constrained /difficult economic circumstances
 - Those living in deprived areas
 - Those with personality / cognitive impairments
- 7.4 In accordance with the Gambling Commissions recent gambling harms framework and previous publications, the types of harms that have been considered as part of this local area profile are as follows:
- Gambling associated crime (acquisitive and those at a gambling premises)
 - Relationship breakdown/problems (reported domestic incidents)
 - Unemployment, financial stress and income deprivation
 - Health issues
 - Homelessness
 - Children being exposed to gambling (accidental or otherwise)
- 7.5 Haringey has modelled where such risks might be more acute in certain areas in comparison to others. This has included an assessment of the key characteristics of the borough to identify areas of higher risk of vulnerability to gambling-related harm. The approach is based on the possible risk to gambling-related harm and does not

mean that just because an area is seen as being at higher risk, that all people in that area will suffer harm or be at risk of suffering harm.

7.6 Haringey will take specific note of whether an application relates to a premise that is:

- Close to an educational establishment, including colleges and universities;
- Close to a centre dealing with addictions;
- Close to general practitioners and supported housing that focuses on mental health;
- Situated in an area of high, gambling associated crime;
- Situated in an area of deprivation;
- Close to locations that are regularly visited by those who are unemployed such as job centres and food banks; or
- Close to the location of businesses providing instant access to cash such as payday loans, pawn shops

7.7 We would expect applicants for a new license to submit the completed assessment with their application. It must identify the risks and state what control mechanisms are to be employed at the premises to ensure that the licensing objectives are being met having regard to the local area profiles produced by this Authority. The assessment must consider at a minimum:

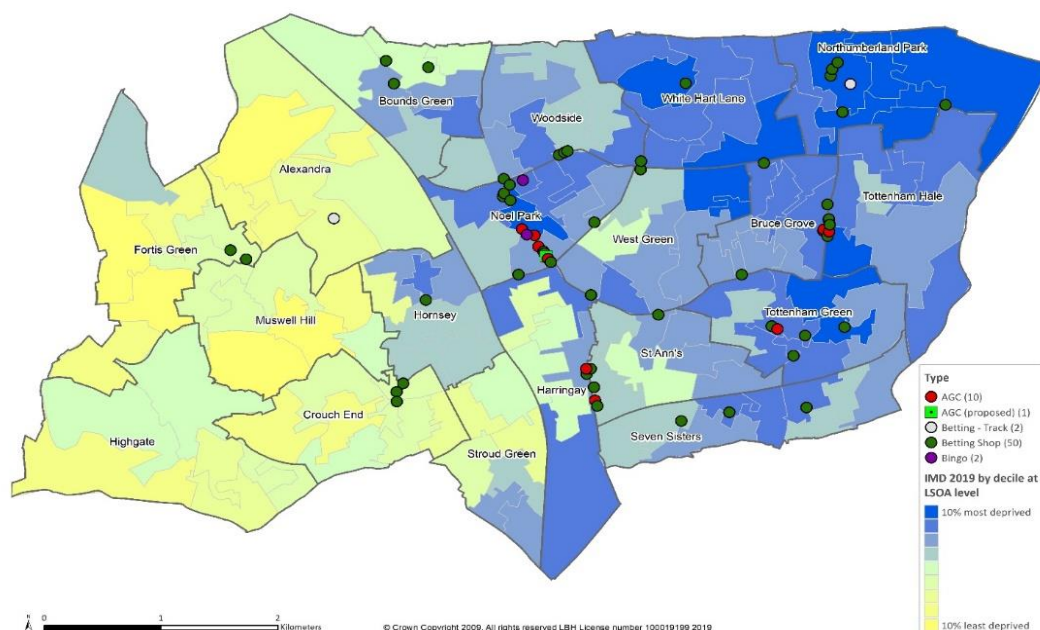
- **The local area**, including but not restricted to the types of premises and operation in the area surrounding the gambling premises; educational facilities; centres for vulnerable people; high crime area; high unemployment area; pawn broker/pay day loan businesses in the vicinity; other gambling premises in the vicinity
- **The gambling operation**, including but not restricted to what gambling products it provides in the premises; the staffing levels within the premises; the level and requirement for staff training; whether loyalty or account cards are used or not; the security and crime preventions arrangements it has in place; how it advertises locally and on the premises; the marketing material within the premises; the display and provision of information
- **The design and layout of the premises**, including but not restricted to whether the staff have obstructed views of gaming machines or entrances; whether the design is such that children can see gambling taking place;
- **The control mechanisms** to be put in place to mitigate the risks, for example; the use of CCTV cameras, the provision of magnetic door locks, employment of door supervisors, employing a challenge 25 scheme, increased number of trained staff.

7.8 Problem gambling is defined as “to a degree that compromises, disrupts or damages family, personal or recreational pursuits” and there are many types of gambling activity which can become ‘problem gambling’. The most common gambling activities that become problematic are; spread betting, betting with a betting exchange, playing poker in pubs or clubs, betting offline on events other than sports or horse or dog racing, and playing machines in bookmakers.

7.9 This evidence was produced using research conducted by Natcen Social Research (Gambling Behaviours in Great Britain 2015) and Geofutures in 2016 (now Gambleaware). The latter defined higher concentrations to be locations where three or more betting shops are located within 400 meters of one another.

8. The Haringey Picture

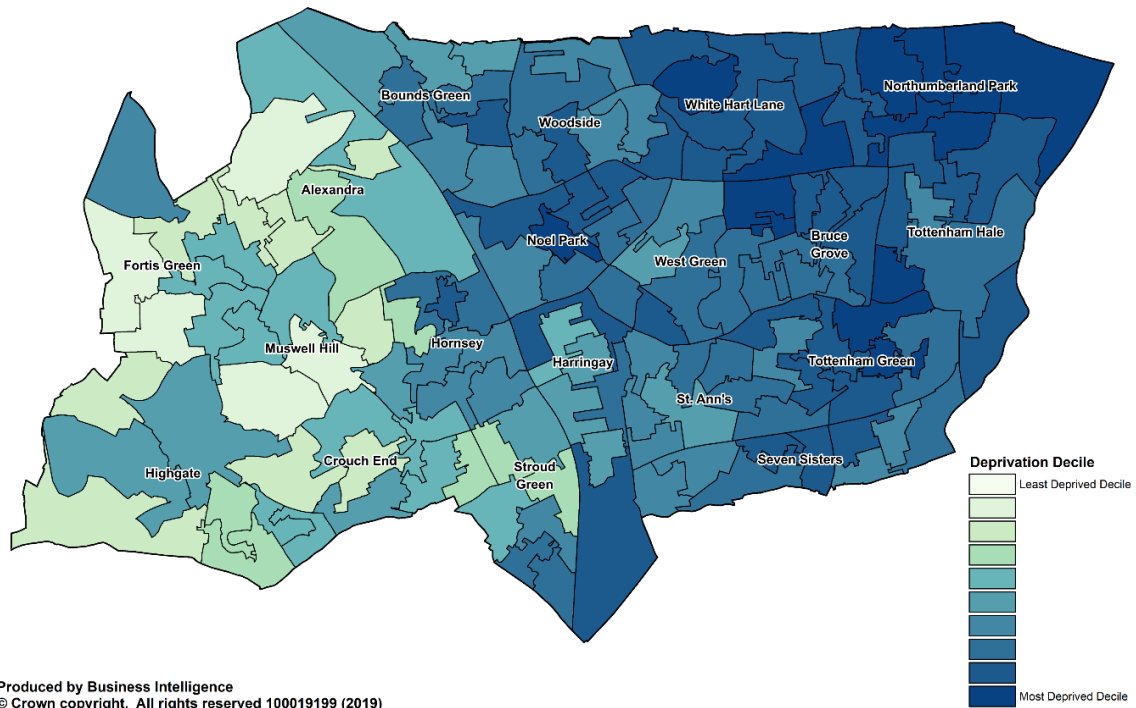
8.1 In Haringey, we currently have 50 betting shops, 10 Adult Gaming Centres, 2 Bingo premises and 1 track betting premises. Gambling is a pressing health inequalities issue. More deprived wards have higher number of betting shops, adult gaming centres and bingo and this is linked to deprivation levels.



9 Deprivation in Haringey

9.1 Haringey is the 4th most deprived borough in London, with deprivation more concentrated in the north east. Relative deprivation has reduced since 2015, though Haringey's London ranking has not shifted significantly

9.2 Haringey is ranked 49 out of the 317 local authorities in England with respect to deprivation, and is the 4thmost deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The Index takes into account a range of deprivation types, including income, employment, education, health, crime, barriers to housing and services and living environment.

2019 IMD Decile Ranks

9.3 The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country. By comparison, in the west a very small proportion of LSOAs fall into that category, and in the westernmost wards – Highgate, Fortis Green, Muswell Hill, Alexandra and Crouch End –there are none. Although Haringey’s overall IMD score has improved since 2015 (where it was ranked 30th in England), improvements have been seen across London meaning that Haringey still ranks among the most deprived boroughs in the capital.

9.4 Vulnerable areas at risk from gambling harm:

The map above illustrates the wards with the highest betting facilities and the areas of deprivation in the East of the borough. crimes relating to betting shops within Haringey that will require additional consideration from operators wishing to operate in these areas:

- Noel Park Ward
- Woodside Ward
- Bruce Castle Ward
- Tottenham Central Ward
- Tottenham Hale Ward
- West Green Ward
- Hermitage & Gardens Ward
- Harringay Ward
- Northumberland Park ward
- White Hart Lane.
- South Tottenham Ward

▪ St Ann Ward

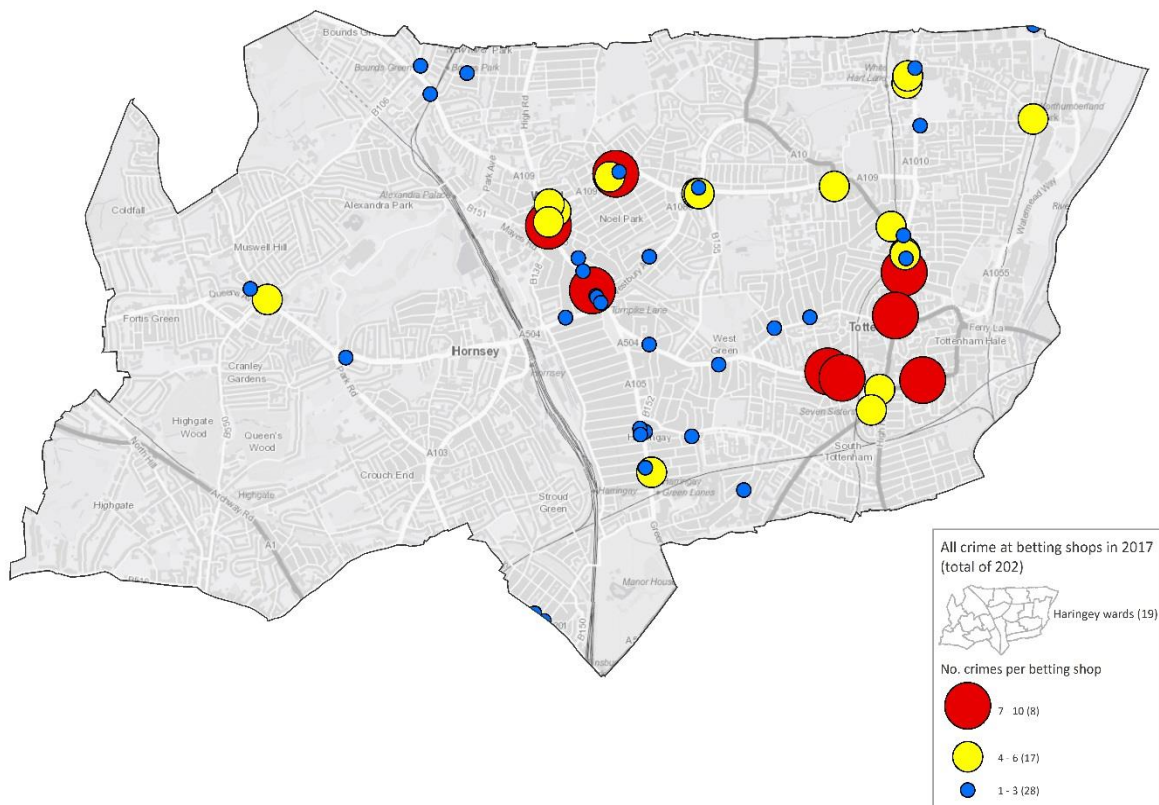
These areas have been chosen due to:

- Higher levels of crime
- Drug dealing and misuse
- Gang activity in the area
- Issues with street drinking and anti-social behaviour
- Issues with street begging
- Homelessness
- Mental health support accommodation

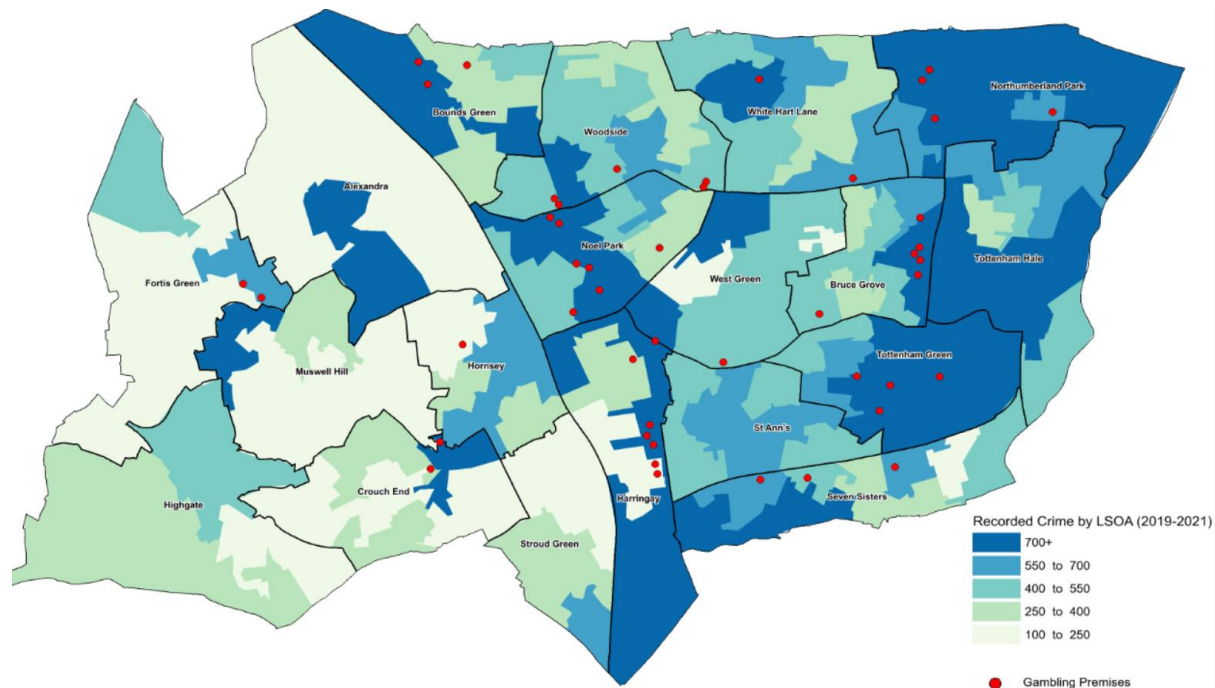
9.5 Based on these risks, gambling vulnerability and harm can be seen to be at risk in these particular areas. The purpose of highlighting these areas to current and future premises operators makes clear where gambling vulnerability is most acute.

9.6 The following maps demonstrate the levels of crime taking place across the borough and again the east of the borough is most affected. There is a further summary map below that shows areas within Haringey identified as being at risk from gambling harm.

9.7 Betting shop crime across the borough,



9.8 The map below has used the LSOA crime stats, which have been overlaid with the betting shop locations.



9.9 The table below shows crime levels in LSOAs which contain betting shops compared to those with no betting shops. The LSOAs with betting shops in them have experienced significantly more crime between 2019 and 2021 than those without.

Average Count of Total Recorded Crime per LSOA (2019-2021)	
LSOAs with no gambling premises	344
LSOAs with one or more gambling premises	572
LSOAs with three or more gambling premises	989

9.10 Table 1. Gambling premises (betting shops, adult gaming centres, bingo only) per 10,000 population in Haringey.

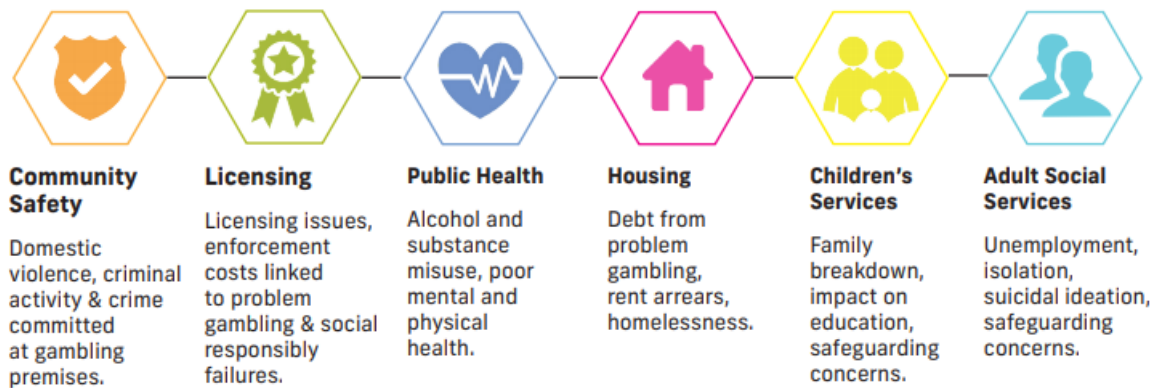
Ward	Ward Population	Number of Betting shops, Adult Gaming centres and Bingo	Premises per 10,000
Alexandra	11,758	1	0.9
Bounds Green	14,998	3	2
Bruce Grove	14,820	5	3.3
Crouch End	12,315	2	1.6
Fortis Green	6,341	2	3.1
Harringay	14,243	3	2.1
Highgate	10,713	0	0
Hornsey	13,003	2	1.5
Muswell Hill	10,636	0	0
Noel Park	12,787	14	10.9
Northumberland Park	9,224	6	6.5
Seven Sisters	17,744	3	1.6
St. Ann's	14,434	5	3.5
Stroud Green	11,568	0	0
Tottenham Green	16,516	4	2.4
Tottenham Hale	10,250	5	4.9
West Green	9,652	3	3.1
White Hart Lane	7,882	1	1.3
Woodside	10,724	5	4.7
	229,608	64	2.8

9.11 An analysis of the number of gambling premises in Haringey illustrates there are 2.8 betting shops, adult gaming centres and bingo per 10,000 of the population (Table 1) which is almost double than the national average of 1.6 per 10,000¹

9.12 Gambling has the potential to cause harm to both individuals and to wider society (i.e., unemployment, debt, crime, relationship problems, physical and mental health conditions). This presents a challenge as it is linked to a range of services such as licensing, community safety, children and families and housing/homelessness and therefore it is an issue that cannot be tackled by interventions aimed solely at individuals.

¹ ¹ According to the gambling commission there were 10,590 betting shops and bingo halls in the UK in March 2018, and according to population estimates by ONS the UK population in 2017 was 66.05 million; this gives a betting shop/bingo hall per 10,000 people of 1.6 ⁽¹⁵⁾

9.13 It is also estimated that up to seven other people are impacted for every problem gambler. Problem gambling in the UK is now endemic and it should be treated as a public health crisis – reducing gambling related harm is linked to our priorities set in the **Borough Plan** for people and place.



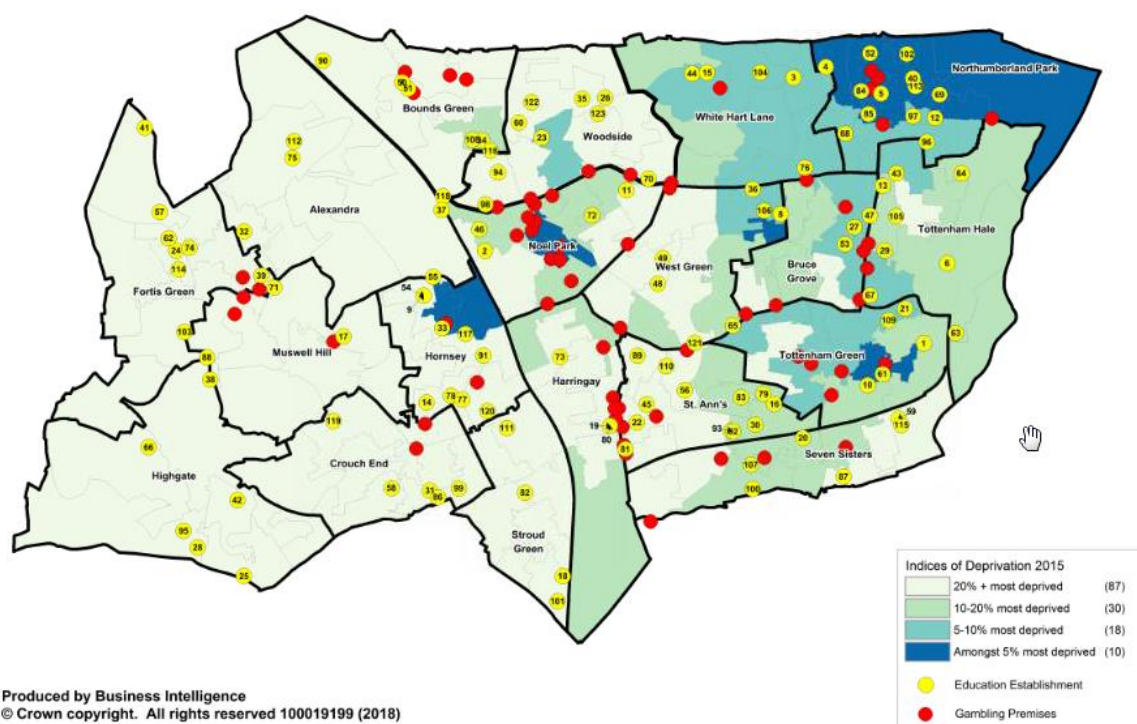
9.14 Within these areas we also have the highest number of betting premises within a 400metrs radius to nearest educational establishments

9.15 Schools with the highest number of gambling premises within the 400m radius

School Name	Number of Gambling Premises
(80,81) South Harringay Junior and Infant School	8
(53) Bruce Grove Primary School	7
(72) Noel Park Primary School	6

9.16 The map below illustrates the locations of the educational establishments overlay with the areas of deprivation data.

Gambling Premises & All Educational Establishments with Indices of Multiple Deprivation (IMD 2015)



10 Risk factors in Haringey - Data

10.1 Although gambling is a legal entertainment activity it can, in some locations have a negative impact on individuals and the wider community. The Council has tried to understand how gambling can affect its residents and visitors.

10.2 All areas shown within the local area profile as being at high overall risk of Gambling related harm, are generally considered inappropriate for further gambling establishments, which could potentially raise the risk of gambling related harm to vulnerable people living in those areas. Operators are asked to consider very carefully whether seeking to locate new premises or relocating existing premises within these areas would be consistent with the licensing objectives and the local risks identified.

10.3 In order to protect its community's wellbeing and family life, the borough will require significant risk assessments and control methods to be available with any application for a premises licence. The east of the borough has particular heightened risk around anti social behaviour and deprivation, risk assessments for betting premises in these areas will need to show specific measures to deal with these issues that will not exacerbate existing problems. This does not mean that an assessment does not need to be made for the rest of the Borough only that assessments need to be relevant to the risks.

10.4 Haringey will take a robust and proportionate approach to licensing issues. Premises which will impact on the economy of this borough and its community will be expected to build into operational plans, sufficient measures to minimise the impact of the premise's operation on the residential, and other economic based activities. The local area profiles will enable us to better manage the expectations of the betting operator.

11 HEALTH

- 11.1 Haringey has high level of factors that increase the risk to mental health, such as deprivation, unemployment and homelessness, all of which are more concentrated in the east of the borough. The proportion of residents living alone (24%) locally is greater than in London and England (22% and 18% respectively). Five in every 1,000 residents in Haringey are homeless, a rate which is higher than the London average (Source: DCLG). Joblessness is higher in the east and 48% of people claiming allowance have mental health behavioral disorders. Increases in unemployment, debt, overcrowding and homelessness (driven by changes to the temporary accommodation subsidy system, combined with high rents) can potentially further increase the level of mental health problems in Haringey.
- 11.2 Mental health conditions are very common, affecting one in four people at some point in their life and one in six adults at any one time. Mental health conditions include depression, anxiety, psychosis, schizophrenia and dementia. Together, they account for the single largest source of disability and ill health in the UK. Although suicide is relatively rare, it is an important cause of preventable deaths with lasting, devastating impacts on those bereaved.
- 11.3 People with mental health conditions experience more physical ill health and earlier mortality than the rest of the population. Mental ill health, and the stigma and discrimination associated with it, can have negative impacts on every aspect of life, including social inclusion, employment and education, with economic hardship and physical ill-health leading to a significant risk of earlier death. Good mental health is also characterized by wellbeing, self-esteem and social inclusion.
- 11.4 There were 22,752 adults diagnosed with depression, anxiety or both registered with Haringey GP practices in 2018.
- Sixty-one per cent of people aged 18 and over diagnosed with depression and/or anxiety were women in 2013.
 - 4,103 adults with a serious mental illness were registered with a Haringey GP practice in 2018.
 - 64 suicide deaths were reported in Haringey between 2015-2017
- 11.5 In Haringey, 3% of people of Black or Black British ethnicity have a diagnosis of serious mental illness, higher than other ethnic groups.
- In Haringey, BME groups and LGBT people are more likely to be diagnosed with a psychotic disorder.
 - In Haringey, people living in deprived areas are more likely to be affected by depression.
- 11.6 Over the past few years there has been a growing recognition of the need to make dramatic improvements to mental health services for CYP. 50% of mental health problems are established by age 14 and 75% by age 24. A child with good mental health is much more likely to have good mental health as an adult, to be able to take on adult responsibilities and fulfil their potential. It is anticipated that the levels of mental ill-health will increase over the coming years as the current economic climate of long term austerity causes more financial hardship and unemployment and fears of destitution. Unfortunately, no models exist which can account for these changes. However, assuming no change in underlying prevalence of mental health

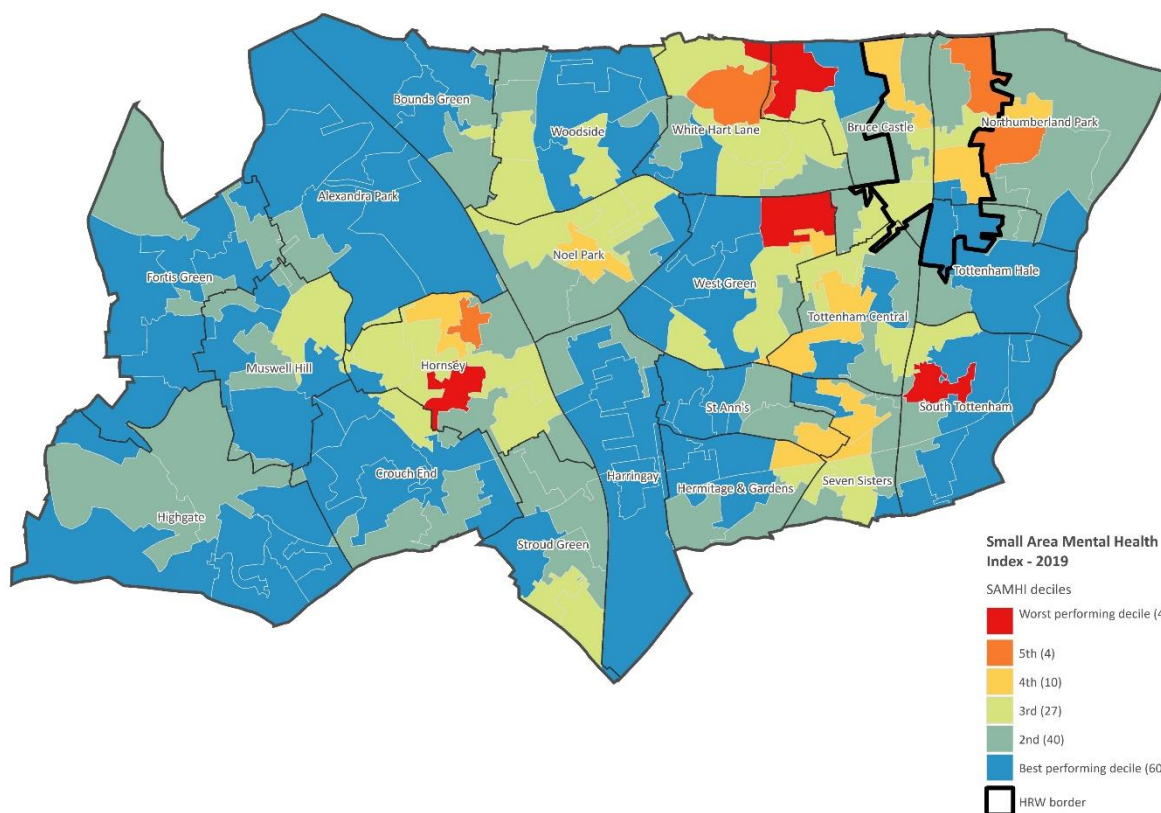
conditions, then we estimate that due to population structure changes alone:

- Approximately 300 additional cases of **serious mental illnesses**, rising to around 4,400 diagnosed cases overall.
- The number of adults with **depression and/or anxiety** will increase from 22,752 in 2018 to 30,900 by 2028. A part of this increase will come from the 5,500 16-24 year olds who are currently estimated to have depression or anxiety.

11.7 Around 19,900 people in Haringey or 7.7% of the GP registered population were diagnosed with depression (2018/19), not significantly different to London. This is estimated to be only a third of people living with common mental illness in Haringey. Latest data shows NCL with a rate of 10.5%, above London at 9.45% but below England (13.25%) – all three are rising. We have 4,400 people diagnosed with severe mental illness in Haringey (1.37%), significantly higher than the London average of 1.1% (2018/19). Latest NCL figure for 2022/23 is 1.28% with London at 1.14%, and England at 1% (all three increasing slightly since last year)

11.8 Suicide rates in Haringey have significantly decreased over the last ten years, with Haringey now in line with the London average • Central and East Haringey exhibit high levels of risk factors for poor mental health, such as deprivation, unemployment and homelessness, and many people have experienced trauma. These are more concentrated in the East of the borough

The map shows LSOAs, grouped by decile across England. Haringey doesn't have any LSOAs in the England's worst performing decile (10), Haringey's worst performing LSOAs are in England's 6th decile - so areas shown shaded red are the worst performing LSOAs in Haringey (decile 6 for England), while areas shaded blue are the best performing 10% (decile 1 for England).



11.9 The SAMHI is a composite measure of population mental health for LSOAs in England. It combines data on the following into a single index

1. Mental health related hospital attendances (rate per person)
2. Prescribed antidepressants (rate per person)
3. QOF: Depression diagnosis (patients %)
4. Mental health incapacity benefit/ESA (claimant rate)

The table below shows performance for the 9 LSOAs covering HRW, including the four contributing metrics as well as the overall SAMHI. HRW's average SAMHI score (-0.10) is higher (worse) than Haringey's (-0.35) and London's (-0.39) but lower (better) than England's (0.7). HRW also has higher scores than Haringey for mental health related ESA claimants and mental health attendances to hospital. Two HRW LSOAs, Haringey 002A and 037D, are found in Haringey's top 10 SAMHI LSOAs, ranked 7th and 9th respectively. Haringey 002A also ranks 4th and 5th highest in Haringey for Incapacity benefit/ESA mental illness claimants and Mental health related hospital attendances metrics, respectively.

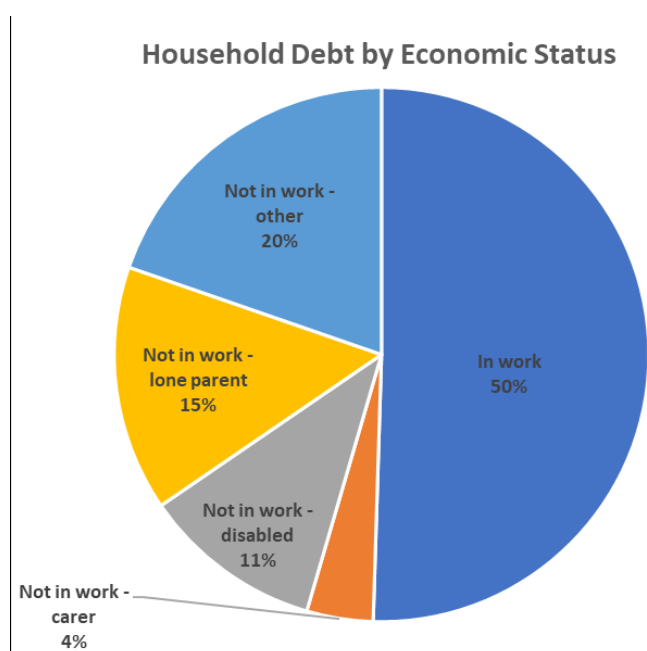
Source: <https://pldr.org/dataset/2noyv/small-area-mental-health-index-samhi>

12 ECONOMIC FACTORS

12.1 Haringey also currently has an estimated 5,000 5-16 year olds with an emotional or behavioural disorder. This indicates that hundreds of children will be transitioning to adult services in the coming years. It is estimated that there will be 378 new cases of **dementia** by 2028, as the population aged 65+ increases by 30%.

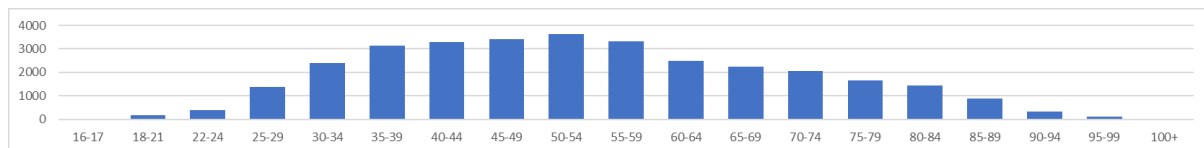
12.2 Haringey has a large independent supported housing provision for people with mental health issues. This provision is used by local authorities around London which places extensive pressures on Haringey services. Most of these services are placed in east of the borough.

- a. The Low Income Families Tracker (LIFT) draws information from a variety of datasets to enable LBH to examine poverty trends across Haringey's low income households and identify families in danger of crisis.

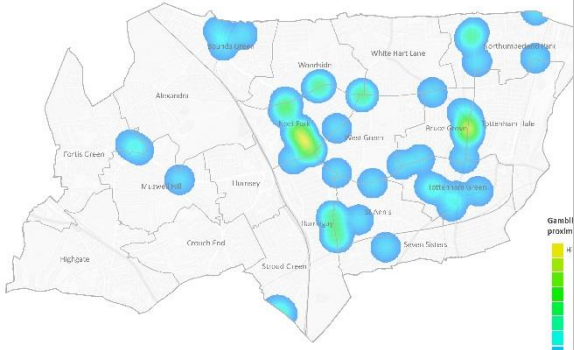
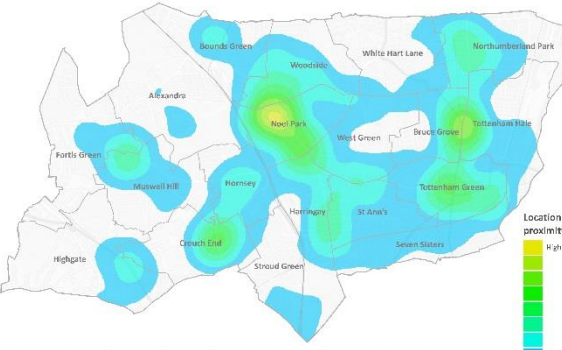
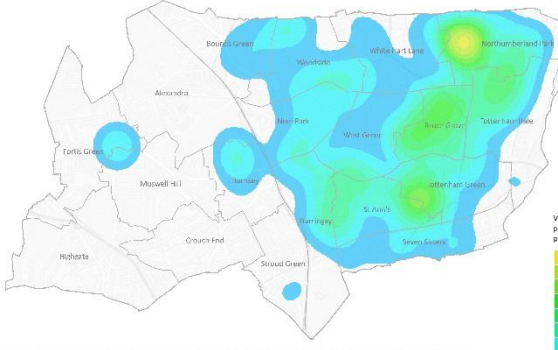
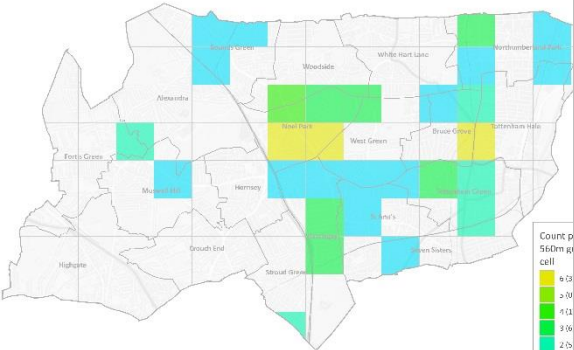
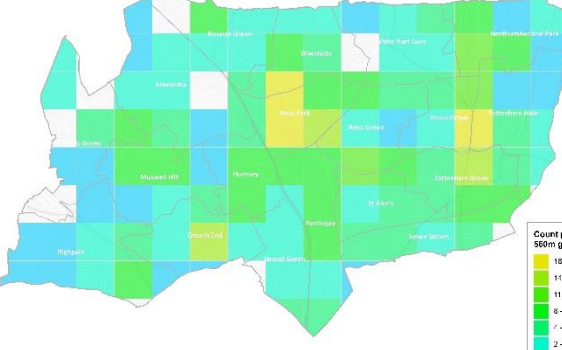
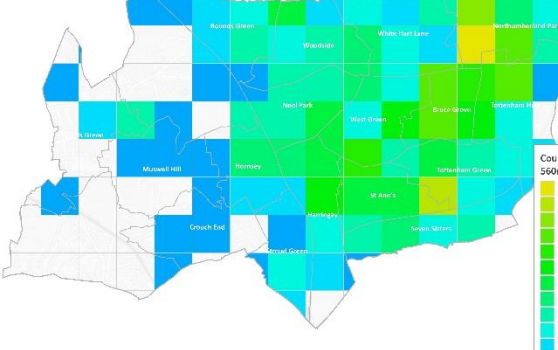


b. Approximately one third of Haringey households are in receipt of Housing Benefit; collectively these residents have accrued £6,300,000 of debt through rent and council tax arrears as of May 2020. 50% of the debt is owed by families where at least one person is in work, with a further 30% owed by either a lone parent, a carer or a disabled person.

Housing benefit age of claimants



- c. Analysis shows that 19.5% of the Haringey residents who claim housing benefit have
- d. outgoings greater than the amount of money that comes to them each month. When added up this shortfall comes to approximately £2 million per month.

Areas in Haringey identified as being at risk to gambling-related harm Proximity or hotspot maps identify clusters of location and vulnerable persons incidents relative to each other compared to their overall dispersal throughout the borough (Maps 1, 2 & 3)		
Map 1. Licensed gambling premises proximity Map 2. Locations criteria proximity Map 3. Vulnerable persons criteria proximity		
Proximity Maps Licensed gambling premises proximity 	Locations criteria proximity  <p>Including: Parks and open spaces, community centres, libraries, cinemas, clubs, licensed gambling premises, museums, skate-parks, schools and colleges, supermarkets, take-aways, places of worship, money lending/pawn shops, foodbanks, crime locations</p>	Vulnerable persons proximity  <p>Including: Residents under 18 years old, unemployed, minority ethnic groups, residents in high deprivation areas, persons living in temporary accommodation, substance misuse treatment services, ESA claimants for mental health issues,</p>
Data source: LBH Licensing	Data source: See Table 1	Data source: See Table 2
Count or thematic maps total the sum of location and vulnerable person's incidents by grid-cell. Each cell measures 560m x 560m and there are a total of 118 grids covering Haringey borough (Maps 4, 5, 6 & 7)		
Map 4. Licensed gambling premises count Map 5. Locations criteria count Map 6. Vulnerable persons criteria count		
Count Maps Licensed gambling premises 	Location criteria count  <p>Including: Parks and open spaces, community centres, libraries, cinemas, clubs, licensed gambling premises, museums, skate-parks, schools and colleges, supermarkets, take-aways, places of worship, money-lending/pawn shops, foodbanks, crime locations</p>	Vulnerable persons criteria count  <p>Including: Residents under 18 years old, unemployed, minority ethnic groups, residents in high deprivation areas, persons living in temporary accommodation, substance misuse treatment services, ESA claimants for mental health issues,</p>
Data source: LBH Licensing	Data source: See Table 1	Data source: See Table 2

The Gambling Act 2005 prescribes in its licensing objectives the “protection of children and other vulnerable persons from being harmed or exploited by gambling”. Data shown in Table 1 and Table 2 below was collated and used to determine risk areas vulnerable to gambling related harm

Table 1. Location criteria data

Description	Datasets	Geography	Source
Area with high levels of organised crime	Suspected & convicted Child Sexual Exploitation (CSE) incidents, human trafficking, modern day slavery & drug offences	Ward	Haringey police
Areas with an over-concentration of similar existing licensed operation	Licensed gambling establishments in Haringey i.e. betting shops & adult gaming centres (AGC)	Building	LBH , Licensing
Community facilities & public buildings	Community centres, tenant halls, libraries & other public buildings	Building	Valuations Office
Leisure & recreational establishments used by families	Leisure centres, cinemas, theatres, cultural events, museums, galleries & community organisations	Building	LBH, Licensing, Planning
Education	Secondary schools and further education establishments	Building	LBH, Environments & Neighbourhood
Recreational grounds	Parks, open spaces, play areas/adventure playgrounds	Polygon	LBH, Environments & Neighbourhood
Places of worship	Churches and faith based premises	Building	LBH, Environments & Neighbourhood
Shops used by families & children	Shopping centres, supermarkets and take-away/chicken shops	Building	LBH, Licensing, Planning
Youth clubs	Youth clubs	Building	LBH, YJS

Table 2. Vulnerable persons criteria data

Description	Datasets	Geography level	Source
Young people	No. residents under 18	LSOA	Census 2011
Financial difficulties / debt	Food banks, pawnbrokers & payday loan shops	Building	LBH, Licensing
Homeless	Temporary accommodation	Building	LBH, Housing
Living in deprived areas	Index of Multiple Deprivation (IMD) 2019	LSOA	Dept. Communities & Local Government
Minority ethnic groups	Non- white ethnic groups i.e. Asian / African / Caribbean / Black British & Arab or other ethnic groups	LSOA	Census 2011
Poor mental health	Employment Support Allowance (ESA) claimants for mental health conditions	LSOA	Nomis
Problem gamblers seeking treatment	No data found for Haringey	NA	NA
Substance abuse / misuse	Drug & alcohol treatment services & needle exchange pharmacies	Building	LBH, Public health
Unemployed	Job Seekers Allowance (JSA) claimants	LSOA	Nomis

Methodology: Datasets were mapped using their Easting and Northing co-ordinates. Address-point level co-ordinates were created from building address information in datasets where co-ordinates were not provided. Datasets relating to areas such as parks/open spaces and deprivation data aggregated to LSOA - used their polygon centroid as co-ordinates. The distance used for measuring proximity and grid-cell size is 560m. This distance is based on the average of distances measured between residents’ homes and local facilities (post office, primary school, general store or supermarket and GP surgery) in Haringey as published by the Department for Communities and Local Government

Licensing Guidance

1. Haringey considers that local risk assessments are a key component of the overall assessment and management of the local risks. Each locality has its own challenges and applicants will be expected to address those local challenges in the undertaking of their own independent gambling risk assessments, and when submitting an application to the Local Authority.
2. Gambling operators will be required to undertake a risk assessment for all of their existing premises. Operators must also undertake a review of those assessments when certain triggers are met. These are:
 - New premises applications;
 - Significant changes in local circumstances; and
 - Variations of the premises license
3. If a gambling premises operator does not put forward measures to overcome the local risks, or the mitigate such risks, the council will consider what measures are needed. The Authority expects that each premises will have a copy of its own independent local area risk assessment onsite for authorised officers to view on request.
4. The risk based approach provides a better understanding of, and enables a proportionate response, to risk. Risk is related to the probability of an event happening and the likely impact of that event. In this case it is the risk of the impact on the licensing objectives. This guide will assist gambling operators in undertaking and preparing their local (premises) risk assessments.
5. The policy is reflective of local issues, local data, local risk and the expectations a licensing authority has of operators who either currently offer gambling facilities or wish to do so in the future.
6. The existence of a clear and robust statement of policy provides greater scope for Licensing authorities to work in partnership with operators, other local businesses, communities, and responsible authorities to identify and to proactively mitigate local risks to the licensing objectives.
7. This local risk assessment process, although similar requires a much broader range of considerations when identifying local risk. Operators must consider the local area in which the premises are situated, the gambling operation and the premises both internally and externally.
8. The final control measures relate to specific physical measure that will address an identified risk factor. These physical control measures may, for example, include alarms, CCTV cameras, doors, magnetic locks, time locks on safes, window shutters, UV lights in toilets.
9. The control measures identified to mitigate a perceived risk may involve a combination of systems, design and physical measures. For example to address the risk factors relating to children gaining access to an over 18 restricted gambling premises, the operator may identify the following control measures:
 - Systems: PASS card or age verification policies, challenge 21 scheme, staff training and door staff.
 - Design: Exterior design which will not attract children into the premises, the entrance layout will enable staff and security to watch those entering the premises and challenge them on the grounds of age.

- Physical: Magnetic door locks and ID scans.
10. If an application for a new licence or variation is submitted that is within 400 metres of premises/location where children, young persons and vulnerable persons are operators are encouraged to provide details of the measures to be implemented that would overcome the potential risks in the identified areas.
 11. If the operator does not put forward measures to overcome the risks, or the Council considers that the operator's proposed measures do not adequately mitigate the risk, the Council will consider what measures are needed which can include additional conditions or even refusal of the application if appropriate. The Authority expects that each shop will have a copy of its local area risk assessment onsite for authorised officers to view on request.

This page is intentionally left blank

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Adoption of Gambling Policy 2025-2028
Service Area:	Regulatory Services.
Officer Completing Assessment:	Daliah Barrett – Licensing Team Leader
Equalities Advisor:	Diptasri Basu.
Cabinet meeting date (if applicable):	15th October 2024.
Director/Assistant Director	Barry Francis.

2. Executive summary

2a Licensing authorities are required by the Gambling Act 2005 to publish a Statement of Principles that they propose to apply when exercising their functions under the 2005 Act. The Statement must be published at least every three years and can be reviewed from “time to time” with any amended parts re-consulted upon. The 2024-2025 Statement was circulated for consultation for a period of 6 weeks.

The objective of the Statement of Principles is to inform interested parties of the principles the licensing authority proposes to apply when exercising its functions under the Gambling Act 2005. The authority must have regard to the licensing objectives as set out in section 1 of the Act:

- Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.
 - Ensuring gambling is conducted in a fair and open way
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling
- The Licensing authority aims to permit the use of premises for gambling:
- In accordance with any relevant Code of Practice issued by the Gambling Commission.

- In accordance with any guidance issued by the Gambling Commission
- Reasonably consistent with the licensing objectives
- In accordance with the Authority's Statement of Gambling Policy.

Vulnerable people should be protected from harm. Who 'vulnerable people' are or the ways in which they may be vulnerable is not defined by the 2005 Act, though the Gambling Commission states that for regulatory purposes this is likely to include: *"people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs."* (Gambling Commission, 2012)

3. Consultation and engagement

3a. The consultation was undertaken by an online survey that was placed on the website and shared with elected members, residents' associations, Traders associations

In accordance with the Gambling Act 2005, a number of statutory consultees were engaged throughout the consultation. This included:

- the fire authority
- the police service
- the Gambling Commission
- Planning
- Environmental Health
- Child Protection
- HMRC

The gambling consultation was publicised via Communications Teams. Awareness was raised through use of social media.

3b. Deprivation has a significant impact on health and wellbeing. The Council areas of deprivation are largely located in the East of the borough - but many communities could also be considered deprived in terms of barriers to housing and essential services.

In Haringey, we currently have 50 betting shops, 10 Adult Gaming Centres, 1 Bingo premises and 1 track betting premises.

These are located across the Borough with concentrations in the East of the Borough.

The Gambling Policy Statement has scope to advance equality by promoting good relations and reduce inequality/protect vulnerable persons. The Statement supports a culture of openness where appropriate information can be accessed by all parties, hearings are generally held in public and enforcement is in line with the principles promoted within the enforcement concordat.

The policy does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome.

4. Data and Impact Analysis

Consultation has identified negative impacts of gambling premises on children, vulnerable adults and those who are socioeconomically disadvantaged. However, insofar as the Gambling Act 2005 does not provide powers to local authorities to restrict gambling outfits in particular areas, sufficient mitigations cannot be made to tackle the negative impacts on vulnerable people with protected characteristics

4a. Age Data

Borough Profile¹

- 54,422: 0-17 (21%)
- 71,660: 18-34 (27%)
- 63,930: 35-49 (24%)
- 46,516: 50-64 (18%)
- 27,706: 65+ (10%)

Target Population Profile

- 0-17 (XX%)
- 18-34 (XX%)
- 35-49 (XX%)
- 50-64 (XX%)
- 65+ (XX%)

Potential Impacts

Statistics for the Gambling Commission contained within the NatCen “Gambling behavior in Great Britain” show overall, the highest participation rates in any form of gambling activity were among adults aged between 25 and 64 (between 60% and 62%), while the lowest rates were found among the youngest and oldest age groups; 46% of 16 to 24 year olds and 47% of those aged 75 and over had gambled in the past year.

<https://www.gamblingcommission.gov.uk/PDF/survey-data/Gamblingbehaviour-in-Great-Britain-2016.pdf>

Actions and objectives are stated in the policy that will help protect vulnerable and young people. It is not however anticipated that the proposed policy will have a negative effect on the grounds of age.

No one under the age of 18 years can access on street gambling premises.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%²
 - Day to day activities limited a lot – 6.1%
 - Day to day activities limited a little – 7.5%
- 7.5% of residents people diagnosed with depression³
- 1.7% of residents diagnosed with a severe mental illness⁴
- 0.4% of people in Haringey have a learning disability⁵

Target Population Profile

¹ Census, 2021 – [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/populationandhousehold/populationandhouseholdestimates/populationandhouseholdestimates)

² Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/bulletins/disabilityandlongtermhealth)

³ NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](https://www.nhs.uk/quality-outcomes-framework/prevalence-of-diagnosed-depression-among-gp-registered-population-age-18-plus)

⁴ NHS Quality Outcomes Framework – [Prevalence of diagnosed mental health diagnosis among GP registered population age 18+](https://www.nhs.uk/quality-outcomes-framework/prevalence-of-diagnosed-mental-health-diagnosis-among-gp-registered-population-age-18-plus)

⁵ PHE Learning disability profiles – <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

Potential Impacts

More than 19,500 people in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64. In the policy applicants are requested to have regard to the type of people that are likely to visit their premises in their application when identifying the steps, they will take to promote the licensing objectives. Applicants will be expected to propose steps to ensure that the physical layout of the premises does not present any risks to 'vulnerable' people, some of whom may be disabled.

During inspections, officers will refer any relevant details to planning if it is suspected there may be accessibility issues or a lack of planning permission.

It is not however anticipated that the proposed policy will have a negative effect on the grounds of disability.

4c. Gender Reassignment

Data

Borough Profile⁶

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman – 0.1%
- Trans man - 0.1%

Target Population Profile

This policy does not target those protected by virtue of gender reassignment

Potential Impacts

This policy does not target those protected by virtue of gender reassignment

4d. Marriage and Civil Partnership

Note: Only the first part of the equality duty ("*Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act*") applies to this protected characteristic.

Data

Borough Profile⁷

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)
- Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%)
- Single (never married or never registered a same-sex civil partnership): (45.3%)
- Widowed or surviving partner from a same-sex civil partnership: (6.1%)

Target Population Profile

This policy does not target those protected by virtue of marriage or civil partnership

⁶ Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityenglandandwales/2021)

⁷ Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/relationshipsandpartnerships/bulletins/marriageandcivilpartnershipstatusinenglandandwales/2021)

Potential Impacts

-
- This policy does not target those protected by virtue of marriage or civil partnership

4e. Pregnancy and Maternity

Note⁸:

- Pregnancy is the condition of being pregnant or expecting a baby.
- Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Data

Borough Profile ⁹

Live Births in Haringey 2021: 3,376

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Potential Impacts It is not anticipated that the proposed policy will have a negative effect on the grounds of pregnancy and maternity/paternity. **4f. Race**

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.¹⁰

Data

Borough Profile ¹¹

Arab: 1.0%

- Any other ethnic group: 8.7%

Asian: 8.7%

- Bangladeshi: 1.8%
- Chinese: 1.5%
- Indian: 2.2%
- Pakistani: 0.8%
- Other Asian: 2.4%

Black: 17.6%

- African: 9.4%

⁸ Equality and Human Rights Commission, 2022 – [Pregnancy and maternity discrimination](#).

⁹ Births by Borough (ONS)

¹⁰ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

¹¹ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

- Caribbean: 6.2%
- Other Black: 2.0%

Mixed: 7.0%

- White and Asian: 1.5%
- White and Black African: 1.0%
- White and Black Caribbean: 2.0%
- Other Mixed: 2.5%

White: 57.0% in total

- English/Welsh/Scottish/Northern Irish/British: 31.9%
- Irish: 2.2%
- Gypsy or Irish Traveller: 0.1%
- Roma: 0.8%
- Other White: 22.1%

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

Statistics for the Gambling Commission contained within the NatCen “Gambling behavior in Great Britain” show gambling participation was highest among White adults; six in ten (59%) White adults had gambled in the past 12 months, compared with 46% of Black adults, 45% of adults in other minority ethnic groups and 32% of Asian adults. A similar pattern was evident among those who gambled on activities other than the National Lottery draws only. For online gambling the pattern was slightly different; similar proportions of adults in the White group and other minority ethnic groups had gambled online (both 10%), compared with 5% of Black adults and just 2% of Asian adults.

<https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-behaviour-in-Great-Britain2016.pdf>

The Local Authority has established procedures for engaging with the diverse range of businesses within the Council area. Consultation on the new Statement of Gambling Policy will be undertaken with statutory consultees, including representatives from the business community. It is not however anticipated that the proposed policy will have a negative effect on the grounds of race.

The Local Authority has established procedures for engaging with the diverse range of businesses within the Council area. Consultation on the new SGP was undertaken with statutory consultees, including representatives from the business community. It is not however anticipated that the proposed policy will have a negative effect on the grounds of race.

4g. Religion or belief

Data

Borough Profile ¹²

- Christian: 39%
- Buddhist: 0.9%
- Hindu: 1.3%
- Jewish: 3.6%
- Muslim: 12.6%
- No religion: 31.6%
- Other religion: 2.3%
- Religion not stated: 8.0%
- Sikh: 0.3%

Target Population Profile

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Potential Impacts

It is not anticipated that the proposed policy will have a negative effect on the grounds of race

4h. Sex

Data

Borough profile ¹³

- Females: (51.8%)
- Males: (48.2%)

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

¹² Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/religiousandethnicgroups/articles/religion-england-and-wales-2021)

¹³ Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicity/articles/gender-identity-age-and-sex-england-and-wales-2021)

The revised Statement of Gambling Policy would have a neutral impact on the protected characteristic of Sex (gender)

4i. Sexual Orientation

Data

Borough profile ¹⁴

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

The revised Statement of Principles would have a neutral impact on the protected characteristic of Sexual Orientation

4j. Socioeconomic Status

Data

Borough profile

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023¹⁵
- 19.6% of residents were claiming Universal Credit as of March 2023¹⁶
- 29.3% of jobs in Haringey are paid below the London Living Wage¹⁷

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁸

¹⁴ Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/sexualorientationandgender/articles/sexualorientationandgenderinenglandandwales/2021)

¹⁵ ONS – [ONS Claimant Count](https://www.ons.gov.uk/peoplepopulationandcommunity/employmentandearnings/articles/claimantcount/2023)

¹⁶ DWP, StatXplore – [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/statistics/universal-credit-statistics)

¹⁷ ONS – [Annual Survey of Hours and Earnings \(ASHE\) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics](https://www.ons.gov.uk/peoplepopulationandcommunity/employmentandearnings/articles/annualsurveyofhoursandearnings/ashe)

¹⁸ DfE – [GCSE attainment and progress 8 scores](https://www.gov.uk/government/statistics/gcse-attainment-and-progress-8-scores)

- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁹
- 5.0% were qualified to level one only²⁰

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.²¹

Target Population Profile

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Potential Impacts

- Statistics for the Gambling Commission contained within the NatCen "Gambling behaviour in Great Britain" show that adults in employment or training were most likely to have gambled in the past 12 months, with almost two thirds (63%) having spent money on any gambling activity. Over half of retirees (53%) and those who were unemployed (54%) had gambled in the past year, closely followed by adults who were otherwise economically inactive (49%). Those in full time education had the lowest levels of participation with around a third (32%) having gambled in the past 12 months. Excluding participation in National Lottery draws only, there was a different pattern of participation; in particular, unemployed adults had similar rates of gambling to those in employment or training (45% and 48% respectively). Those in employment were again the most likely group to gamble online, with 13% having done so in the past year. However, around one in ten (9%) full time students and those who were unemployed had gambled online in the past 12 months. Retirees were the least likely group to have gambled online, with 2% having done so. <https://www.gamblingcommission.gov.uk/PDF/surveydata/Gambling-behaviour-in-Great-Britain-2016.pdf>
- The Local Area Profile sets forward areas of concerns to focus the applicant on specific considerations for a given area.

5. Key Impacts Summary

No gap identified with regards to equalities and diversity and the Statement of Gambling Policy under the Gambling Act 2005. The Council Will ensure premises are considering their

¹⁹ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²⁰ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²¹ IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#)

own impact on vulnerable persons such as persons with disabilities or with gambling addictions during inspections. Continued engagement with the trade to ensure local area risk assessments are undertaken and these are suitable.

5a. Outline the key findings of your data analysis.

Assessment of impact and outcome

Protected characteristics	Issues taken from evidence	Outcome	Recommendations
Socio-economic	No adverse impact	low	N/A
Age	No adverse impact	low	N/A
Disability	No adverse impact	low	N/A
Pregnancy Maternity	No adverse impact	low	N/A
Race	No adverse impact	low	N/A
Religion /belief	No adverse impact	low	N/A
Sex gender	No adverse impact	low	N/A
Sexual Orientation	No adverse impact	low	N/A
Trangender	No adverse impact	low	N/A

Appendix 3A contains the data gathered from the responses received . The Cabinet report addresses if any impact on the policy in the table within the report at Table 1.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
- Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

Proper weight has been given to the views of all those consulted and, in particular, 'due regard' given to free text (literal) responses.

5c. Data Gaps

None known

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them **Y/N**

The legislation requires Councils to ‘aim to permit’

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **Y/N**

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **Y/N**

Not an option as we are required to have a policy in place.

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action:

Abide by the regulatory requirements set in the legislation.

Lead officer: **Daliah Barrett.**

Timescale: 15th October 2024

Please outline any areas you have identified where negative impacts will happen because of the proposal, but it is not possible to mitigate them.

Please provide a complete and honest justification on why it is not possible to mitigate the:

The aim to permit requirement is mandatory.

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

Date of EQIA monitoring review:

04th September 2024

8. Authorisation

EQIA approved by (Assistant Director/ Director)

[Type answer here].

Date

04th September 2024

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.

Gambling consultation responses

Proper weight has been given to the views of all those consulted and, in particular, 'due regard' given to free text (literal) responses.

1.

Please tell us your comments on the draft gambling policy

16 Responses



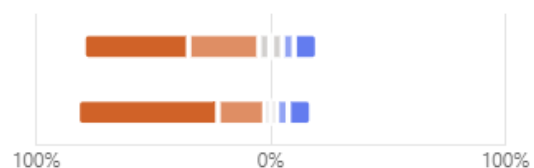
The draft Policy includes a special approach to location issues aimed at addressing the protection of children and vulnerable persons. The policy states that when we receive any relevant representations about a premises licence application the council will consider issues such as: • the proximity of the premises to schools and vulnerable adult centres • the proximity of the premises to residential areas where there may be a high concentration of families with children • the size of the premises and the nature of the activities taking place. The policy goes on to state that such information may be used to inform the decision the council makes about whether to grant the licence, to grant the licence with special conditions or to refuse the application if the concerns cannot be appropriately addressed. Please tell us to what extent you agree or disagree with the statements below.

20 Responses

● Strongly Disagree ● Disagree ● No opinion ● Agree ● Strongly agree

The policy is strong enough to protect children and vulnerable persons from harm

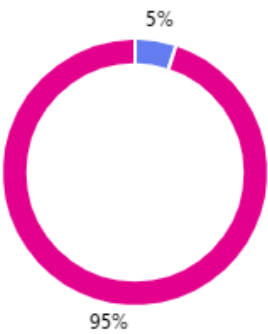
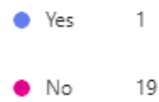
The policy is strong enough to prevent gambling premises from being a source of crime



3.

Do you take part in gambling?

20 Responses



4.

If so, do you do so on the High Street or Online?

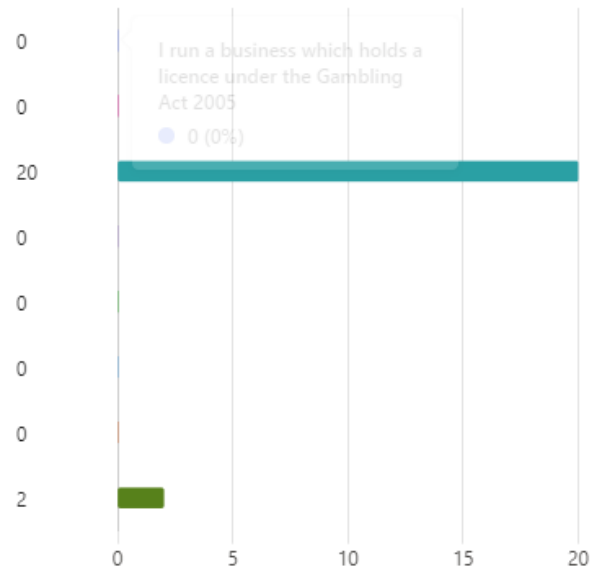
ID	Name	Responses
14	anonymous	n/a
8	anonymous	Online
7	anonymous	I don't gamble

5.

Please select all that apply

20 Responses

- ☐ I run a business which holds a licence under the Gambling Act 2005
- ☐ I run a business that does not hold a licence under the Gambling Act 2005
- ☐ I am a member of the public
- ☐ I am responding on behalf of a regulatory body or council department
- ☐ I am responding on behalf of a hospitality group
- ☐ I am a licensing solicitor or agent
- ☐ I am responding in behalf of a voluntary or community social enterprise/interest group
- ☐ Other

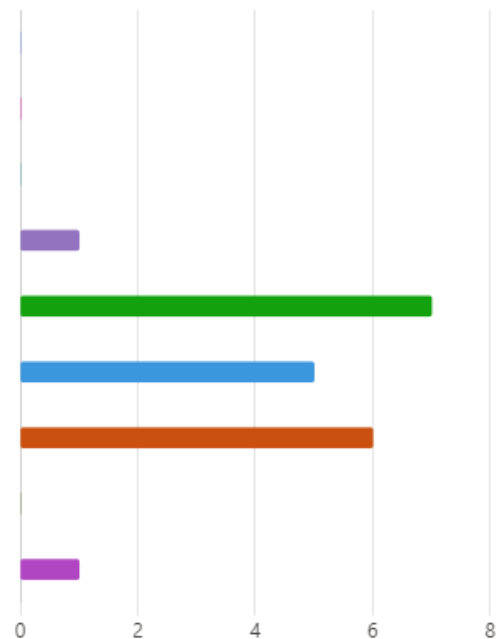


6.

Age Which age group applies to you?

20 Responses

- ☐ Under 17
- ☐ 17-21
- ☐ 22-29
- ☐ 30-39
- ☐ 40-49
- ☐ 50-59
- ☐ 60-74
- ☐ 75+
- ☐ Prefer not to say

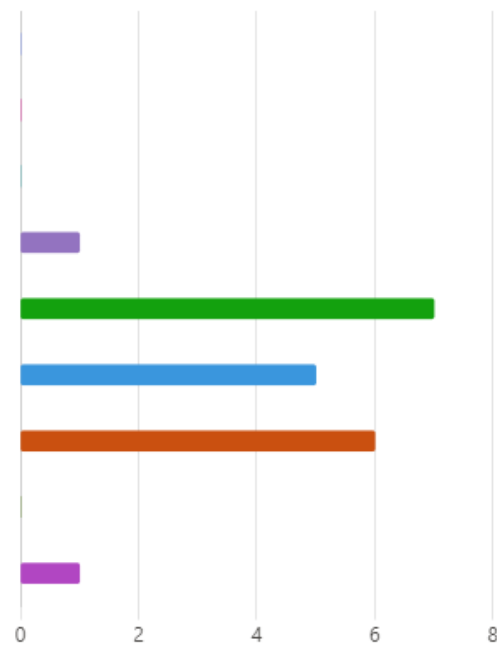


7.

Age Which age group applies to you?

20 Responses

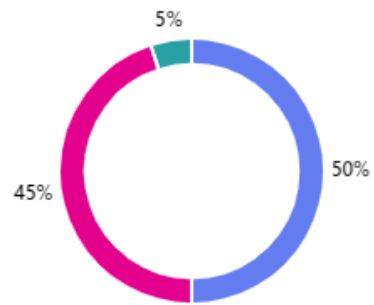
Under 17	0
17-21	0
22-29	0
30-39	1
40-49	7
50-59	5
60-74	6
75+	0
Prefer not to say	1



8.
Sex What best describes your sex?

20 Responses

Male	10
Female	9
Prefer not to say	1
Other	0



9.

Trans - Trans is an umbrella term to describe people whose gender identity is not the same as, or does not sit comfortably with, the sex they were assigned at birth. Do you consider yourself to be trans?

13 Responses

Yes	0
No	12
Prefer not to say	1

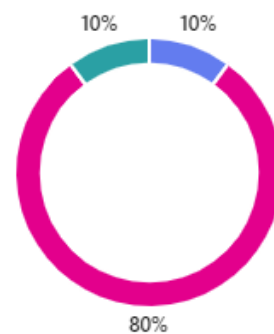


10.

Disability Under the Equality Act 2010, a person is considered to have a disability if she/he has a physical or mental impairment which has a substantial and long-term adverse effect on her/his ability to carry out normal day-to-day activities. Are you disabled?

20 Responses

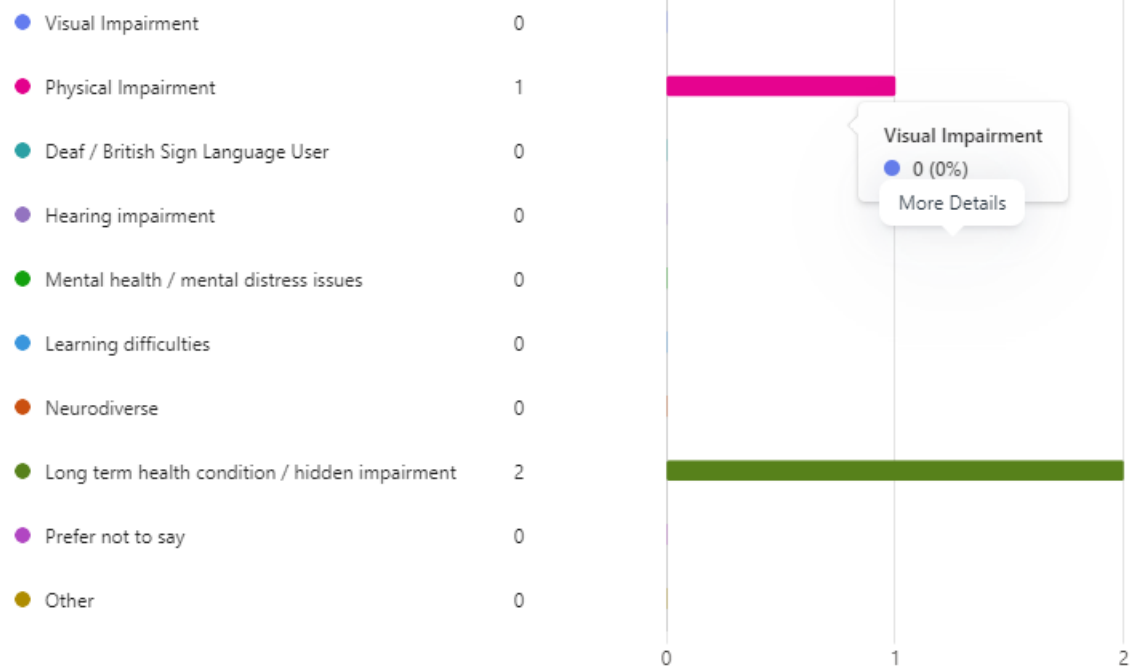
Yes	2
No	16
Prefer not to say	2



11.

Disability Which of the following impairment groups apply to you? You may tick more than one box.

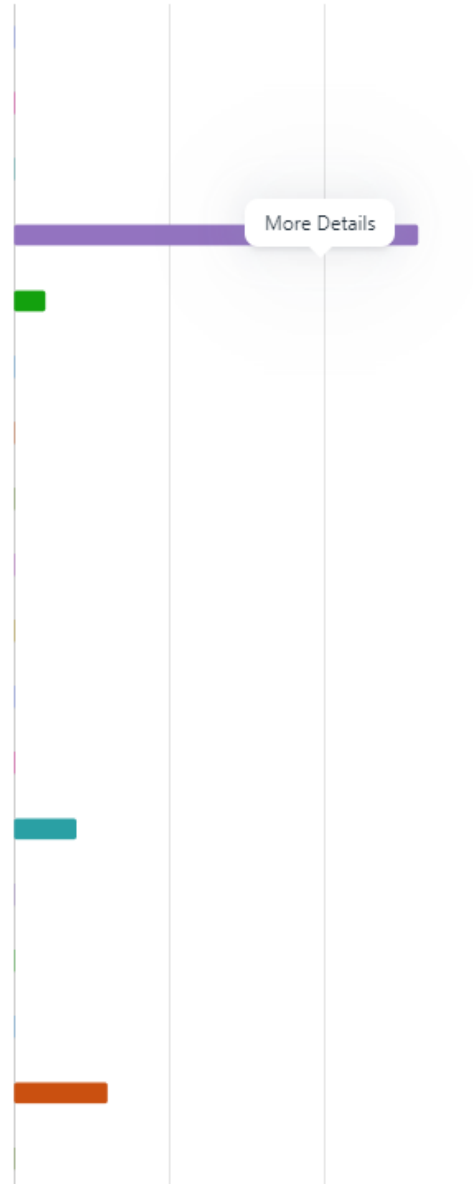
2 Responses



National Identity How would you describe your national identity? You may tick more than one box.

18 Responses

● Afghan	0
● Australian	0
● Bangladeshi	0
● British	13
● Bulgarian	1
● Chilean	0
● Chinese	0
● Colombian	0
● Cypriot	0
● Ecuadorian	0
● English	0
● Eritrean	0
● French	2
● German	0
● Ghanaian	0
● Hungarian	0
● Irish	3
● Italian	0





14.

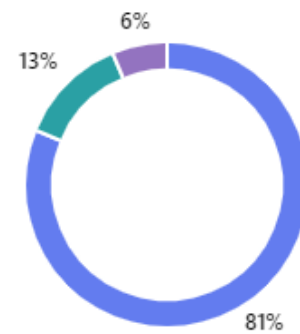
Please enter how you self-describe your ethnicity:

15.

Sexual orientation What best describes your sexual orientation?

16 Responses

Heterosexual / Straight	13
Bi	0
Gay / Lesbian	2
Prefer not to say	1
Other	0

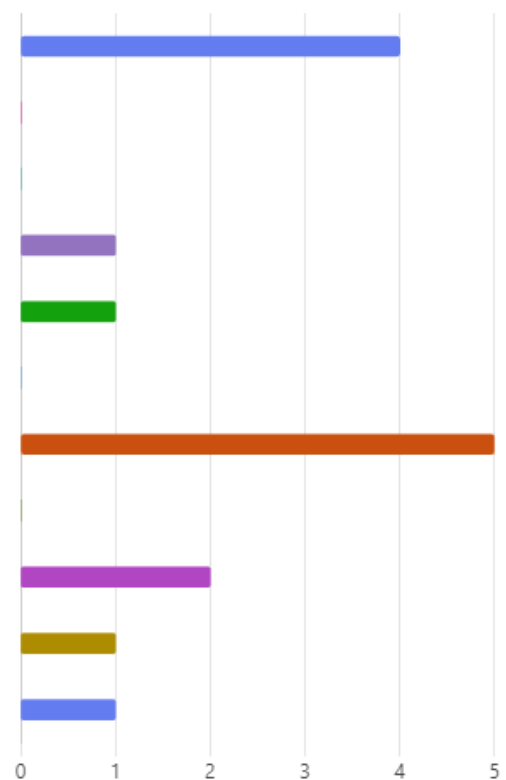


16.

Religion or belief How would you describe your religion or belief? You may tick more than one box.

15 Responses

Atheist	4
Hindu	0
Rastafarian	0
Buddhist	1
Jewish	1
Sikh	0
Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	5
Muslim	0
No Religion	2
Prefer not to say	1
Other	1



17.

Pregnancy and maternity Are you pregnant?

17 Responses

● Yes	0
● No	16
● Prefer not to say	1



18.

Pregnancy and maternity Have you had a baby in the last 12 months?

17 Responses

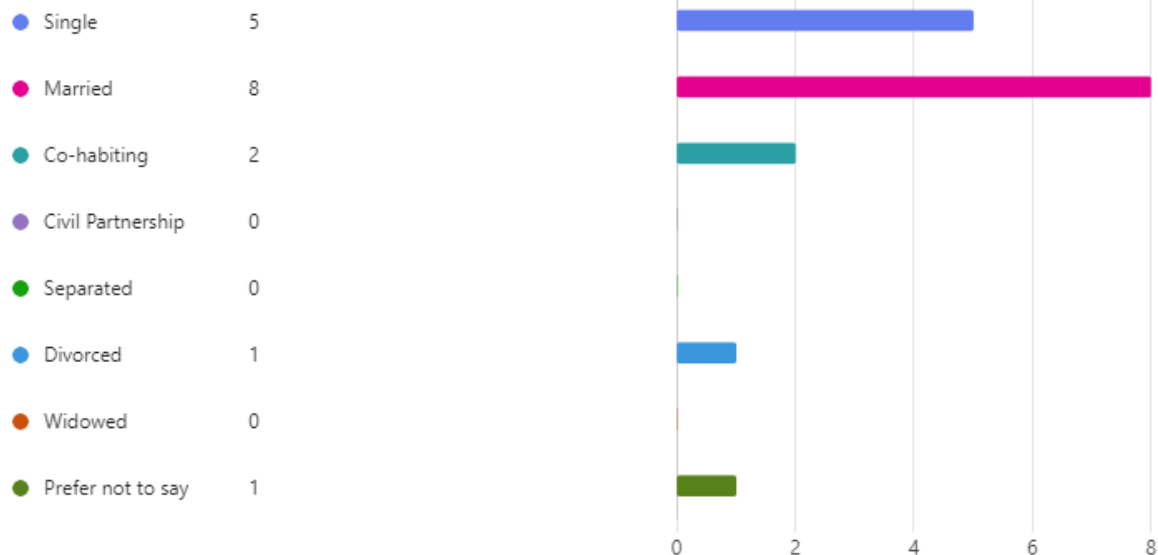
● Yes	0
● No	16
● Prefer not to say	1



19.

Marriage and Civil Partnership What best describes you?

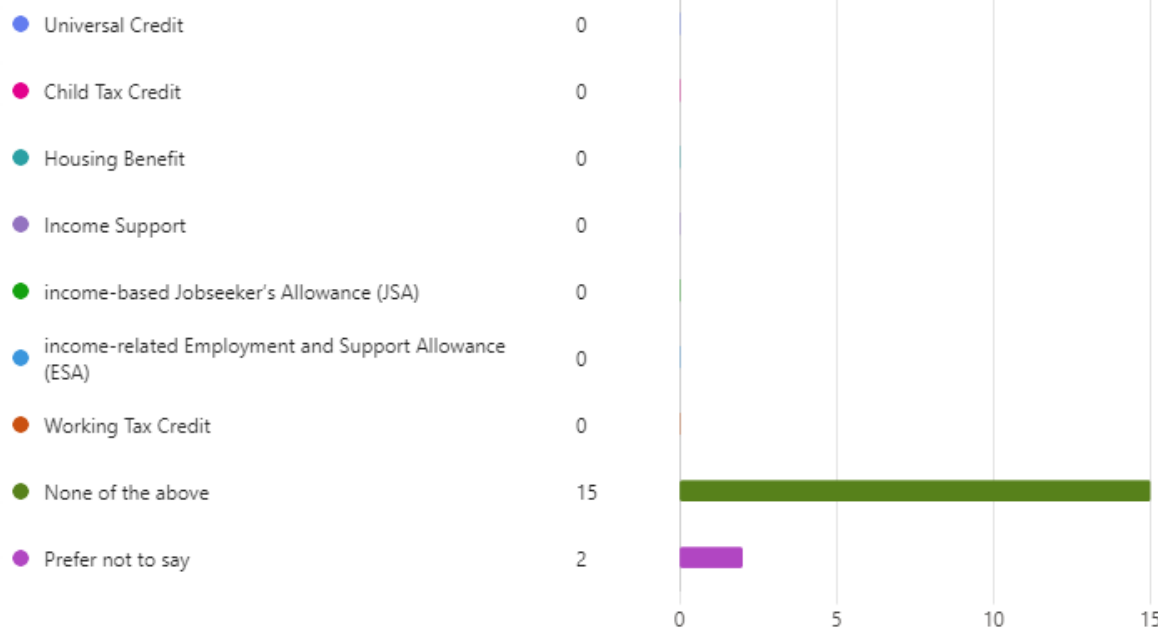
17 Responses



20.

Socioeconomic status - Income. Universal Credit and means-tested benefits Which of the following benefits do you receive, if any? You may tick more than one box.

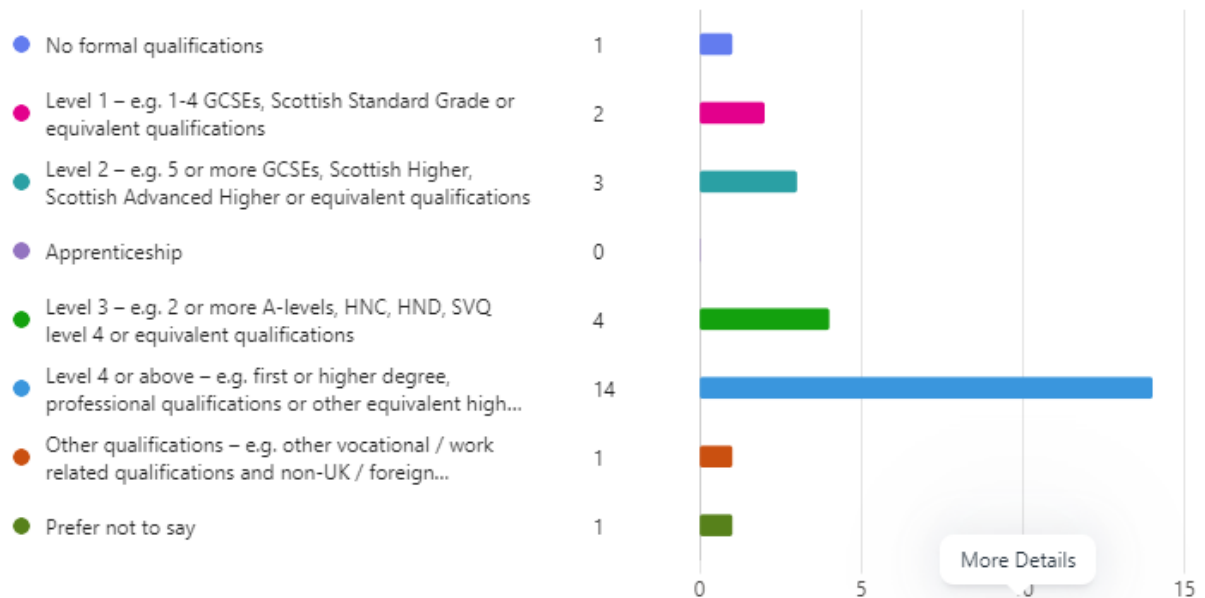
17 Responses



21.

Socioeconomic status - Education Which of these qualifications do you have? Tick every box that applies if you have any of the qualifications listed. If your UK qualification is not listed, tick the box that contains its nearest equivalent. If you have qualifications gained outside the UK, tick the 'Foreign qualifications' box and the nearest UK equivalents (if known).

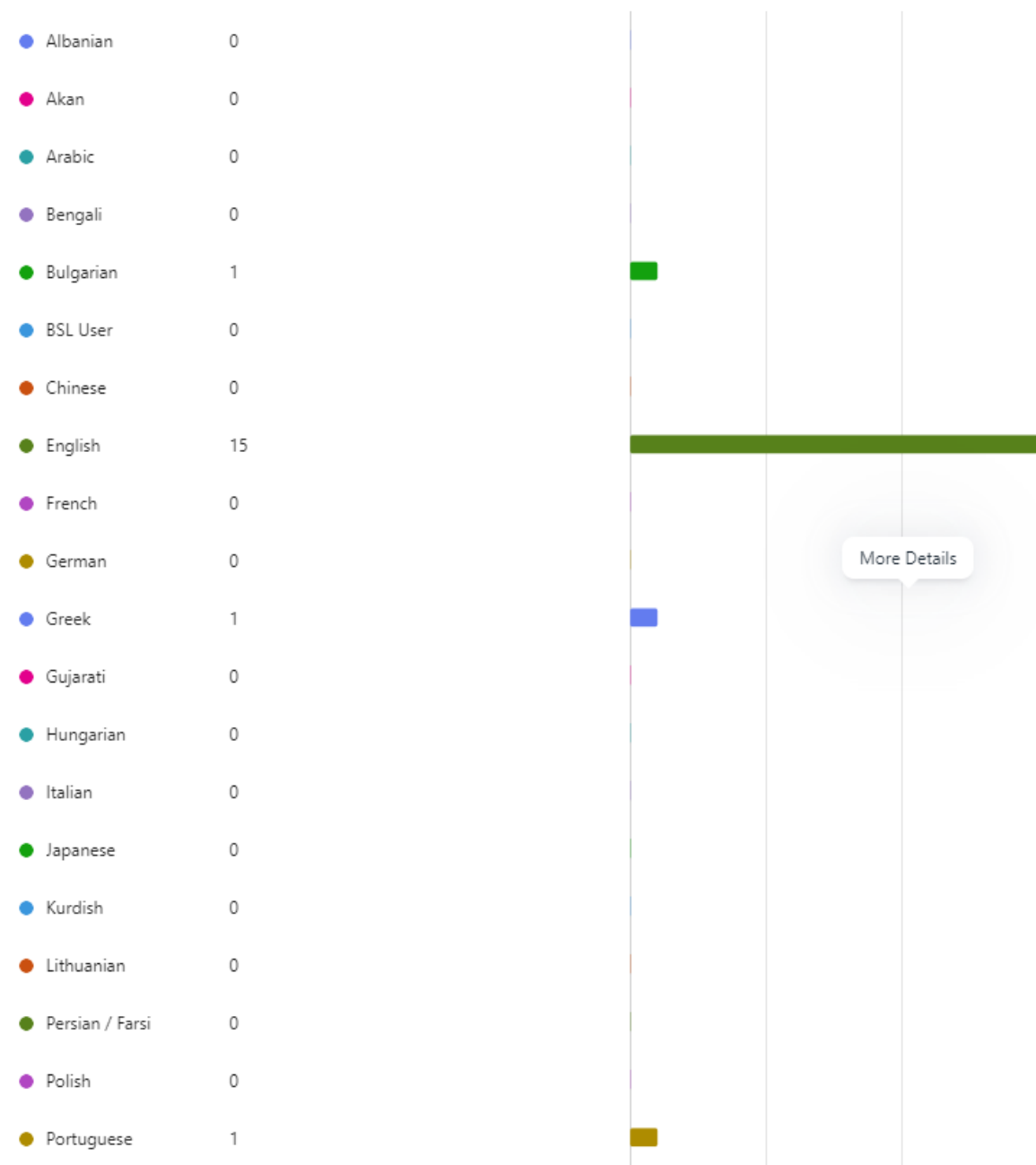
17 Responses

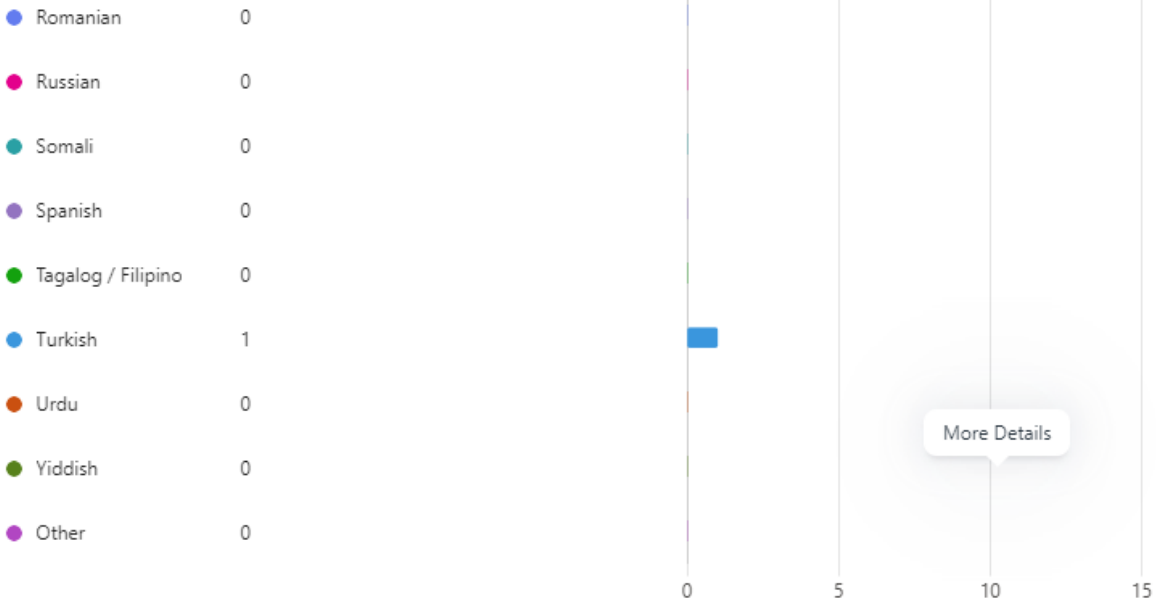


22.

Language What is your preferred language? You may tick more than one box.

16 Responses





REPORT OF THE AUDIT COMMITTEE No. 2, 2024/25

FULL COUNCIL 18 November 2024

Chair: Councillor Erdal Dogan

Deputy Chair: Councillor Cathy Brennan

1. INTRODUCTION

This report to Full Council arises from the report on the Treasury Management quarterly update considered by the Audit Committee at their meeting on the 8 October 2024. The report provides an update on the Council's treasury management activities in accordance with the CIPFA Treasury Management Code of Practice.

Overall responsibility for the Council's treasury management remains with Full Council and the Council approved the Treasury Management Strategy Statement in March 2024. The Audit Committee is responsible for monitoring treasury management activity and Council monitor this through the receipt of quarterly reports.

TREASURY MANAGEMENT REPORT Q1-2024/25

We considered the Treasury Management quarter one update and discussed the following:

- A 'bail-in exposure' was a circumstance where an organisation like a bank went into bankruptcy before the government stepped in to assist it. This happened during the 2008 financial crisis when a lot of the banks failed and the government ended up buying one of the banks. The Council did not tend to invest with banks.
- A query was raised regarding issues around the volatility of the market. The impact in Haringey was considered to be more severe particularly on layers of people who were unemployed because they were higher than elsewhere and also people who potentially may lose their homes putting pressure on the Council in terms of housing. In response, the meeting heard that from a treasury perspective, there were two main areas that were considered. Firstly, cash flow patterns were observed - part of any overspend would be part of the cash generation. Secondly, observations would be made on the capital program delivered throughout the year and these informed the level of borrowing that was needed.
- Consideration would be given to decisions from management. Wider finance and any wider cost to the Council would also be considered. This would include any increase in demand such as more people requiring social care and seeking support with housing. This would come through in the monitoring that was done and reported on a quarterly basis. Anything coming to light in terms of increasing demand would be fed into conversations regarding cash

flow. Any potential changes would not be so significant as to have an implication on treasury management decisions. The Council was predicting and forecasting accurately. It would be surprising for something that needed immediate action to come through.

- A query was raised in relation to capital projects and if it meant that there would be less revenue coming in possibly causing delays and having an impact on the borrowing. In response, the meeting heard that any delays would reduce the amount needed to be borrowed. The Council's borrowing had been captured on the bottom of page 43 of the agenda papers as part of the capital financing requirement (CFR). Part of the CFR borrowing was internal borrowing which had not yet been exercised. This was something that was used tactically and not currently operational. However, it was something that could be taken advantage of if required. If elements of the capital programme program slowed down, then the requirement to do so would become smaller. It was not directly linked to the revenue because revenue often depended on specific schemes. Some schemes were not schemes that produced revenue.
- Treasury Management was mostly about the Council's investment and borrowing. It was possible to argue that a reduction in the budget provision required more cash available to invest, but it did not directly impact on the decisions and investments that the team made. The budget provision was reported every year and movement was being made to report on it every six months. It would not be explicitly seen in the treasury management reports, but there would be other finance reports where more off- balance sheet items could be found.
- In relation to a query regarding the £50 million balance, the meeting heard that this was an assumption of where, at the beginning of the year, the Council figured its cash balance to be. For example, last year, the Council averaged around £70 million over the course of the year as the Council had received a lot of grants. This year, the Council had not had the same fortune of receiving as many grants. The Council at the beginning of the year, had about £83 million, but it was becoming apparent that the balance was closer to £30 million. Over the course of the year, the average was expected to be to probably be slightly below the £50 million balance. However, the rates that the Council was still able to invest remained higher. The Council was still expecting to be on budget. There may be room for the Council to underspend on the interest, but this depended on how the rest of the year would progress.

RECOMMENDATIONS

Full Council is recommended:

To note the treasury management activity undertaken during the financial year to 30 June 2024 and the performance achieved which is attached as Appendix 1 to the attached report.

To note that all treasury activities were undertaken in line with the approved Treasury Management Strategy.

This page is intentionally left blank

Report for: Audit Committee – 08 October 2024

Item number: 11

Title: Treasury Management Report Q1-2024/25

Report authorised by: Josephine Lyseight, Assistant Director of Finance (Deputy S151 Officer)

Lead Officer: Tim Mpofu, Head of Finance – Pensions and Treasury
tim.mpofu@haringey.gov.uk

Ward(s) affected: N/A

**Report for Key/
Non Key Decision:** N/A

1. Describe the issue under consideration

- 1.1. The Council has adopted the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice* (the CIPFA Code) which requires the Council to approve treasury management reports on a semi-annual and annual basis.
- 1.2. The Council's Treasury Management Strategy for 2024/25 was approved at a full Council meeting on 4 March 2024. The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Council's treasury management strategy.
- 1.3. This report provides an update to the Audit Committee on the Council's treasury management activities and performance during the quarter ending 30 June 2024, in accordance with the CIPFA Code.

2. Cabinet Member Introduction

- 2.1. Not applicable.

3. Recommendations

The Audit Committee is requested:

- 3.1. To note the treasury management activity undertaken during the financial year to 30 June 2024 and the performance achieved which is attached as Appendix 1 to this report.
- 3.2. To note that all treasury activities were undertaken in line with the approved Treasury Management Strategy.

4. Reason for Decision

4.1. Not applicable.

5. Other options considered

5.1. Not applicable.

6. Background information

6.1. The Council's treasury management activity is underpinned by CIPFA's Treasury Management in Public Services: Code of Practice (the CIPFA Code), which requires local authorities to produce annually, Prudential Indicators and a Treasury Management Strategy Statement.

6.2. CIPFA has defined Treasury management as: "The management of the authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

6.3. The CIPFA Code recommends that members are informed of treasury management activities at least twice a year. Following an amendment to the Council's constitution in 2023, it was determined that the reviewing and monitoring of treasury policy, strategy and activity is delegated to the Audit Committee. This Committee receives quarterly treasury management update reports, including a mid-year and annual report.

6.4. However, overall responsibility for treasury management remains with full Council, and the Council approved the Treasury Management Strategy Statement and set the Prudential Indicators for 2024/25 on 4 March 2024.

6.5. Government guidance on local authority treasury management states that local authorities should consider the following factors in the order they are stated:

Security → Liquidity → Yield

6.6. The Treasury Management Strategy reflects these factors and is explicit that the priority for the Council is the security of its funds. However, no treasury activity is without risk and the effective identification and management of risk are integral to the Council's treasury management activities.

Economic Background

6.7. During the quarter, UK inflation (CPI) rates continued to decline, reaching the Bank of England's target rate of 2.0% by June 2024. The Bank of England maintained the Bank rate at 5.25% until August 2024, when it lowered the percentage points to 5.00%.

6.8. Financial markets have adjusted their interest rate expectations downward. Arlingclose, the Council's treasury advisor, maintains its central view that the Bank Rate has peaked at 5.25%, with potential rate cuts expected later in 2024.

	Sep-23	Dec-23	Mar-24	Jun-24	Current Rate
--	--------	--------	--------	--------	--------------

BoE Bank Rate	5.25%	5.25%	5.25%	5.25%	5.00%
---------------	-------	-------	-------	-------	-------

6.9. Further details can be found in section 2 of Appendix 1 to this report.

Borrowing Activity

6.10. The Council's primary objective when borrowing is to strike an appropriately low-risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required.

6.11. There has been a significant increase in the cost of both short-term and long-term borrowing over the past two years, although these increases are now stabilising.

6.12. The table below shows the movement in rates offered across the various PWLB maturities on 30 June 2024. The rates shown are included the 0.20% certainty discount rate offered by the PWLB to qualifying authorities.

PWLB Maturity	Sep-23	Dec-23	Mar-24	Mar-24
10 year	5.26%	4.19%	4.74%	4.96%
20 year	5.64%	4.90%	5.18%	5.37%
50 year	5.43%	4.67%	5.01%	5.15%

6.13. As part of its strategy for funding previous and current years' capital programmes, the Council held £832.9 million in loans on 30 June 2024. The Council has a significant capital programme which will largely be financed by new borrowing in the upcoming years. The Council plans to maintain a balanced portfolio of short and long-term borrowing.

6.14. Further details on the borrowing activity of the Council over the period can be found in section 4 of Appendix 1 to this report.

Treasury Investment Activity

6.15. In accordance with the CIPFA Code and government guidance, the Council aims to strike an appropriate balance between risk and return, when making treasury investments. The aim is to prioritise the security and liquidity of its investments before seeking the optimum rate of return or yield.

6.16. Throughout the period, the Council's investment balances ranged between £33.9 million and £83.0 million due to timing differences between income and expenditure, ending at £33.9m on 30 June 2024.

6.17. Overnight deposit rates for the Debt Management Account Deposit Facility and Money Market Funds held steady at around 5.20% throughout the quarter.

6.18. The following table shows how the Council's current Treasury investments compare with other local authorities.

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Ave. Maturity (Days)	Rate of Return
31.03.2024	3.67	AA-	0%	1	5.19%
30.06.2024	3.79	AA-	0%	1	5.19%
Similar Local Authorities	4.70	A+	70%	12	5.20%
All Local Authorities	4.66	A+	62%	6	5.07%

6.19. Further details on the Council's treasury investment activity over the period can be found in section 5 of Appendix 1 to this report.

Treasury Management Prudential Indicators

6.20. The Council measures and manages its exposures to treasury management risks using several indicators that are set when the Treasury Management Strategy is approved in advance of the new financial year.

6.21. The Chief Finance Officer reports that all treasury management activities carried out during the year were fully compliant with the CIPFA Code of Practice and the Council's approved Treasury Management Strategy.

6.22. A detailed assessment of the Council's compliance with the agreed upon Treasury Management Indicators can be found in section 8 of Appendix 1 to this report.

7. Contribution to Strategic Outcomes

7.1. Not applicable.

8. Carbon and Climate Change

8.1. Not applicable.

9. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Legal and Governance, Equalities)

Finance and Procurement

8.1. Finance comments are included throughout the attached report.

Assistant Director of Legal and Governance [Benita Edwards, Head of Legal Services]

8.2. The Head of Legal Services has been consulted on the content of this report which is consistent with legislation governing the financial affairs of the Council. In particular, the Council must comply with the requirements of the Local Government Act 2003, the Local Authorities (Capital Financing & Accounting – England) Regulations 2003 and the CIPFA Treasury Management code.

8.3. In considering the report Members must take into account the expert financial advice available to it and any further oral advice given at the meeting of the Committee.

Equalities

8.4. There are no equalities issues arising from this report.

10. Use of Appendices

10.1. Appendix 1 – Treasury Management Update Report – Q1 2024/25

11. Background Papers

11.1. None

This page is intentionally left blank

Appendix 1 - Treasury Management Update Report – Q1 2024/25

1. Introduction

- 1.1. The Council has adopted the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice* (the CIPFA Code) which requires the Council to approve treasury management semi-annual and annual reports.
- 1.2. This quarterly report provides an additional update and includes the requirement in the 2021 Code of quarterly reporting of the treasury management prudential indicators.
- 1.3. The Council's treasury management strategy for 2024/25 was approved at a full Council meeting on 4 March 2024. The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Council's treasury management strategy.

2. External Context (provided by the Council's treasury management advisor, Arlingclose)

Economic background

- 2.1. UK inflation rates continued to decline during the period. At the start of the reporting period, UK Consumer Price Index (CPI) inflation was 3.2%. By June 2024, it had fallen to reach the Bank of England's (BoE) target rate of 2.0%. The BoE's Monetary Policy Committee (MPC) maintained the Bank Rate at 5.25% until August 2024, when it lowered the rate by 0.25% to 5.00%.
- 2.2. Although financial markets adjusted their interest rate expectations downwards, anticipating a single cut later in the year, the MPC's focus remains on assessing how long rates need to be restrictive to control inflation over the medium term. The table below provides an extract of the Bank Rate over the past four quarters, along with the current rate.

	Sep-23	Dec-23	Mar-24	Jun-24	Current Rate
BoE Bank Rate	5.25%	5.25%	5.25%	5.25%	5.00%

- 2.3. Data released during the period showed that the UK economy had emerged from the technical recession at the end of 2023, expanding by 0.7% in the first quarter of the calendar year.
- 2.4. The labour market data continued to provide mixed messages for policymakers. Although, employment and vacancies have declined, pay growth remained elevated. Given the Bank of England's close monitoring of inflation's "second-round" impact on wages, policymakers will likely require further downward trends before considering further interest rate cuts.
- 2.5. The unemployment rate came in at 4.4% during the period. The table below shows an extract of the annual unemployment rate reported over the past four quarters.

	Sep-23	Dec-23	Mar-24	Jun-24
Unemployment rate	4.1%	3.8%	4.4%	4.4%

- 2.6. In May 2024, the Bank's Monetary Policy Report (MPR) projected increased GDP growth, reflecting the declining negative effects of past rate hikes and expected interest rate declines. The inflation forecast was slightly lower towards the end of the forecast horizon, with the 2% target now expected two quarters earlier than previously predicted.

- 2.7. Arlingclose, the Council's treasury adviser, maintains its central view that 5.25% is the peak Bank Rate. The adviser also suggests that interest rates will likely begin to fall later in 2024. However, medium-term risks are considered to be on the upside. Although inflation has reached its target, it is expected to rise again later in the year, driven by persistent services price inflation and robust wage growth.
- 2.8. The US Federal Reserve maintained rates over the period, holding the Fed Funds Rate at 5.25–5.50% for the seventh consecutive month in June 2024, as expected. US policymakers kept a relatively dovish stance throughout the period but gradually reduced their predictions for the pace and timing of rate cuts due to higher inflation and stronger economic growth. However, in September 2024, the Federal Reserve cut its benchmark interest rate by half a percentage point, initiating its first easing cycle since the onset of the pandemic.
- 2.9. Over in Europe, the European Central Bank (ECB) cut rates in June, reducing its main refinancing rate from 4.50% to 4.25%. Inflation in the region fell to 2.5% in May, after an increase in the previous month. While economic growth in the region has picked up, it remains weak. With inflation above the ECB's target, policymakers continue to face pressure in balancing these factors when setting monetary policy.

Financial markets

- 2.10. Financial market sentiment showed signs of improvement over the quarter, though bond yields remained volatile. Yields climbed steadily early in the period, but mixed economic data and investors' ongoing reassessment of potential rate cuts caused a few pronounced, albeit short-lived, dips. Towards the end of the quarter, yields rose again, generally ending higher than at the start of the period.
- 2.11. The table below shows the movement of the major benchmark gilt yields throughout the period.

Benchmark Gilt Yield	Sep-23	Dec-23	Mar-24	Jun-24
5 year	4.29%	3.48%	3.83%	3.94%
10 year	4.45%	3.54%	3.92%	4.18%
20 year	4.84%	4.13%	4.40%	4.41%

- 2.12. The Sterling Overnight Rate (SONIA) averaged 5.20% over the quarter.

Credit review

- 2.13. Arlingclose maintained its advised recommended maximum unsecured duration limit on all banks on its counterparty list at 100 days.
- 2.14. Credit default swap prices in the UK began and concluded the quarter at levels broadly similar to those observed globally.
- 2.15. Financial market volatility is expected to remain a feature, at least in the near term and credit default swap levels will be monitored for signs of ongoing credit stress. As always, the institutions and durations on the Council's counterparty list recommended by Arlingclose remain under constant review.

3. Local Context

- 3.1. On 31 March 2024, the Council had net borrowing of £819.4m arising from its revenue and capital income and expenditure. The Capital Financing Requirement (CFR) measures the underlying need to borrow for capital purposes. A breakdown of the CFR is summarised in Table 1.

Table 1: Balance Sheet Summary

	31.03.24 Actual £m
General Fund CFR	677.1
HRA CFR	542.9
Total CFR¹	1,220.0
Less: Other debt liabilities ²	(31.0)
Borrowing CFR - comprised of:	1,189.0
External borrowing	819.4
Internal borrowing	369.6

¹subject to audit²finance leases, PFI liabilities and transferred debt that form part of the Council's total debt

- 3.2. The Council continued to pursue its long-standing strategy of keeping borrowing and investments below their underlying levels, also known as internal borrowing, in order to reduce risk and keep interest costs low.
- 3.3. The treasury management position on 30 June 2024 and the change over the year is shown in Table 2.

Table 2: Treasury Management Summary

Type of Borrowing/Investment	31.03.24 Balance £m	Movement £m	30.06.24 Balance £m	30.06.24 Weighted Av. Rate %
Long-term borrowing	779.4	(15.5)	762.9	3.21%
Short-term borrowing	40.0	30.0	70.0	5.35%
Total borrowing	819.4	13.5	832.9	3.39%
Short-term investment	0.0	0.0	0	0.00%
Cash and cash equivalents	33.9	4.0	37.9	5.19%
Total investments	33.9	4.0	37.9	5.19%
Net borrowing	785.5	9.5	795.0	

4. Borrowing Strategy and Activity

- 4.1. As outlined in the treasury strategy, the Council's primary objective when borrowing has been to strike an appropriate risk balance between securing lower interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Council's long-term plans change being a secondary objective. The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. At present, short-term interest rates are higher than long-term interest rates.
- 4.2. Policy interest rates have risen substantially since 2021 although they have largely plateaued over the last year. Over the last quarter gilt yields have risen slightly overall, having had a number of peaks and troughs. There has been downward pressure from lower inflation figures, but also upward pressure from unexpectantly positive economic data. Data from the US continues to impact global markets including UK gilt yields.
- 4.3. Table 3 shows the movement in rates offered across the various Public Works Loan Board (PWLb) maturities on 30 June 2024. The rates shown are included the 0.20% certainty discount rate offered by the PWLB to qualifying authorities.

Table 3: PWLB Rates

PWLB Maturity	Sep-23	Dec-23	Mar-24	Jun-24
10 year	5.26%	4.19%	4.74%	4.96%
20 year	5.64%	4.90%	5.18%	5.37%
50 year	5.43%	4.67%	5.01%	5.15%

- 4.4. Whilst the cost of short-term borrowing from other local authorities peaked at around 7% in late March 2024, primarily due to a lack of liquidity during the month, as expected shorter-term rates reverted to a more normal range and were generally around 5.25% through the quarter.
- 4.5. CIPFA's 2021 Prudential Code emphasises that local authorities should not borrow to invest primarily for financial returns. Local authorities should not make investment or spending decisions that increase the capital financing requirement, resulting in new borrowing, unless such decisions are directly and primarily related to the functions of the local authority. Local authorities are no longer permitted to secure PWLB loans for purchasing investment assets primarily for yield unless the loans are for refinancing purposes.
- 4.6. The Council has not invested in assets primarily for financial return or that are not primarily related to the functions of the Council. It has no plans to do so in the future.
- 4.7. The PWLB HRA rate which is 0.4% below the certainty rate is available up to June 2025. This discounted rate is to support local authorities borrowing for the Housing Revenue Account and for refinancing existing HRA loans, providing a window of opportunity for HRA-related borrowing and to replace some of the Council's loans relating to the HRA maturing during this time frame.
- 4.8. As part of its strategy for funding previous and current years' capital programmes, the Council held £832.9 million in loans on 31 June 2024, an increase of £13.5 million compared to 31 March 2024. The outstanding loans on 31 March are summarised in Table 4.

Table 4: Borrowing Position

Type of Borrowing	31.03.24 Balance £m	Net Movement £m	30.06.24 Balance £m	30.06.24 Weighted Ave. Rate %	30.06.24 Weighted Ave. Maturity years
Public Works Loan Board	679.4	(16.5)	662.9	2.98%	24.1
Banks (LOBO)	100.0	0.0	100.0	4.73%	34.4
Local authorities	40.0	30.0	70.0	5.35%	0.5
Total borrowing	819.4	13.5	832.9	3.39%	23.4

- 4.9. No new long-term borrowing was undertaken during the quarter. However, £16.5m of PWLB loans were allowed to mature without immediate replacement. The Council's borrowing decisions are not based on any single outcome for interest rates, and it maintains a balanced portfolio of short and long-term borrowing.
- 4.10. The Council has a significant capital program that extends into the foreseeable future. A large proportion of this program will be financed by borrowing, which the Council will need to undertake during the current and upcoming years.

LOBO Loans

- 4.11. The Council holds £100m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Council has the option to either accept the new rate or to repay the loan at no additional cost.

- 4.12. With market interest rates having risen, the probability of LOBOs being called has been higher than in the recent past. £50m of LOBO loans had call option dates during the April – June quarter, however no lender exercised their option.
- 4.13. The Council currently holds £50m in LOBO loans, with call dates within the next 12 months. The Council has been working with treasury management advisors Arlingclose to assess the likelihood of the loan options being exercised. If the option is exercised, the Council plans to repay the loan at no additional cost. If required, the Council will use available cash or borrow from other local authorities or the PWLB to repay the LOBO loans.

5. **Treasury Investment Activity**

- 5.1. The CIPFA Treasury Management in the Public Services Code of Practice and Cross-Sectoral Guidance Notes (2021 revision) defines treasury management investments as those arising from an organization's cash flows or treasury risk management activities. These investments represent balances that need to be invested until the cash is required for business operations.
- 5.2. The Council holds invested funds, which represent income received in advance of expenditure, as well as balances and reserves. Throughout the year, the Council's investment balances ranged between £33.9 million and £83.0 million due to timing differences between income and expenditure. The investment position on 30 June 2024 is shown in Table 5.

Table 5: Treasury Investment Position

Type of Investment	31.03.24 Balance £m	Net Movement £m	30.06.24 Balance £m	30.06.24 Weighted Ave. Rate %	30.06.24 Weighted Ave. Maturity
Debt Management Office	33.9	(1.0)	32.8	5.19%	1 days
Money market funds	-	5.0	5.0	5.22%	1 days
Total borrowing	33.9	4.0	37.9	5.19%	1 days

- 5.3. Both the CIPFA Code and government guidance require the Council to invest its funds prudently, taking into account the security and liquidity of its treasury investments before seeking the optimum rate of return or yield. The Council aims to strike an appropriate balance between risk and return when making treasury investments, while minimising the risk of incurring losses from defaults and receiving unsuitably low investment income.
- 5.4. The Bank of England's Bank Rate held steady at 5.25% throughout the quarter, with short-term interest rates hovering around this level. In August 2024, however, the Bank of England lowered this rate by 0.25% to 5.00%. During the period, the overnight deposit rates from both the Debt Management Account Deposit Facility (DMADF) and Money Market Funds (MMFs) remained around 5.2%
- 5.5. The progression of risk and return metrics are shown in the extracts from Arlingclose's quarterly investment benchmarking in Table 6.

Table 6: Investment Benchmarking – Treasury investments managed in-house

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Ave. Maturity (Days)	Rate of Return
31.03.2024	3.67	AA-	0%	1	5.19%
30.06.2024	3.79	AA-	0%	1	5.19%
Similar Local Authorities	4.70	A+	70%	12	5.20%
All Local Authorities	4.66	A+	62%	6	5.07%

Scoring:

AAA = highest credit quality = 1; D = lowest credit quality = 26

Aim = A- or higher credit rating, with a score of 7 or lower, to reflect current investment approach with main focus on security

6. Treasury Performance

- 6.1. The budget for treasury investment income for 2024/25 was set at £2.4m. This was based on a treasury investment portfolio of £50m with an average rate of return of 4.75%. The most recent forecast for the year indicates an average rate of return of 5.19%. Therefore, the Council expects to exceed it's expected treasury investment income.
- 6.2. The borrowing costs for 2024/25 are forecast to be in line with the budget at Q1 at £40.7m (£25.9m HRA, £14.8m General Fund).

7. Compliance

- 7.1. The Director of Finance reports that all treasury management activities carried out during the quarter complied fully with the principles in the Treasury Management Code and the Council's approved Treasury Management Strategy.
- 7.2. Compliance with the authorised limit and operational boundary for external debt is demonstrated in table 7 below.

Table 7: Debt Limits

	30.06.24 Actual £m	2024/25 Operational Boundary £m	2024/25 Authorised Limit £m	Complied?
Borrowing	832.9	1,276.7	1,326.7	Yes
PFI and Finance Leases	15.8	15.8	17.4	Yes
Total debt	848.7	1,292.5	1,344.1	Yes

- 7.3. The operational boundary is a management tool for in-year monitoring. Therefore, it is not significant if the operational boundary is breached on occasion due to variations in cash flow, and this is not considered a compliance failure. However, the council's debt remained well below this limit throughout the quarter.

8. Treasury Management Indicators

- 8.1. The Council measures and manages its exposures to treasury management risks using the following prudential indicators.

Security

- 8.2. The Council has adopted a voluntary measure to assess its exposure to credit risk by monitoring the value-weighted average credit score of its investment portfolio. To calculate this score, a value is assigned to each investment based on its credit rating (AAA=1,

AA+=2, etc.), and the arithmetic average is taken, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

	30.06.24 Actual	2024/25 Target	Complied?
Portfolio average credit score	3.79 (AA-)	7.0 (A-)	Yes

Liquidity

- 8.3. The Council has adopted a voluntary measure to monitor its exposure to liquidity risk. This is done by tracking the amount of cash available to meet unexpected payments over a rolling three-month period, without borrowing additional funds.

	30.06.24 Actual	2024/25 Target	Complied?
Total cash available within 3 months	£37.9m	£30.0m	Yes

Interest Rate Exposures

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

	30.06.24 Actual	2024/25 Target	Complied?
Upper limit on one-year revenue impact of a 1% <u>rise</u> in interest rates	£1.1m	£2m	Yes
Upper limit on one-year revenue impact of a 1% <u>fall</u> in interest rates	£0.4m	£2m	Yes

- 8.5. The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at new market rates.
- 8.6. For context, the changes in interest rates during the quarter were:

	01.04.24 Actual	30.06.24 Target
Bank Rate	5.25%	5.25%
1-year PWLB certainty rate, maturity loans	5.39%	5.37%
5-year PWLB certainty rate, maturity loans	4.72%	4.89%
10-year PWLB certainty rate, maturity loans	4.80%	4.96%
20-year PWLB certainty rate, maturity loans	5.24%	5.37%
50-year PWLB certainty rate, maturity loans	5.07%	5.18%

Maturity Structure of Borrowing

- 8.7. This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

	30.06.24	Upper	Lower	Complied?
--	----------	-------	-------	-----------

	Actual	Limit	Limit	
Under 12 months	14.2%	50%	0%	Yes
12 months and within 24 months	3.7%	40%	0%	Yes
24 months and within 5 years	7.6%	40%	0%	Yes
5 years and within 10 years	12.8%	40%	0%	Yes
10 years and within 20 years	13.6%	40%	0%	Yes
20 years and within 30 years	9.2%	40%	0%	Yes
30 years and within 40 years	12.6%	50%	0%	Yes
40 years and within 50 years	26.4%	50%	0%	Yes
50 years and above	0.0%	40%	0%	Yes

- 8.8. 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.
- 8.9. In the past, the Council has extensively used short-term borrowing (less than 1 year in duration) from other local authorities as an alternative to longer-term borrowing from the PWLB. This was due to lower interest rates at the time, resulting in revenue savings.
- 8.10. However, short-term borrowing exposes the Council to refinancing risk. This is the risk that rates will rise quickly over a short period of time and will be at significantly higher rates when loans mature and new borrowing is required. With this in mind, the Council has set a limit on the total amount of short-term local authority borrowing as a proportion of all borrowing.

	30.06.24 Actual	2024/25 Target	Complied?
Upper limit on short-term borrowing from other local authorities as a percentage of total borrowing	8.4%	30%	Yes