

Agenda Item No: 5
Report To: LICENSING COMMITTEE



Date of Meeting: 20 January 2022

Report Title: Statement of Licensing Policy 2019-2024 (amendment)

Report Author & Job Title: Trevor Ford
Environmental Protection & Licensing Team Leader

Portfolio Holder Cllr. Peter Feacey
Portfolio Holder for: Community Safety and Wellbeing

Summary:

The purpose of this report is to present the results of a statutory consultation on a proposed amendment to Ashford Borough Council's Statement of Licensing Policy 2019-2024, based around the expectations of the licensing authority on the safety of women and vulnerable persons surrounding certain alcohol licensed premises.

Key Decision: NO

Significantly Affected Wards: All

Recommendations: The Committee is recommended to:-

- i. Note the statutory consultation responses, and prepared draft policy.
- ii. Recommend the amendment of the Statement of Licensing Policy 2019-24 to council.

Policy Overview: The determination of Licensing Act applications and notices is a statutory duty and covers regulated activities such as the sale of alcohol, provision of live/recorded music, late night refreshment and film.

Effective regulation, including the provision of a Statement of Licensing Policy, helps to promote; the prevention of crime and disorder, the protection of public safety, the prevention of nuisance, and, the protection of children from harm.

Our Statement of Licensing Policy guides members of the public, applicants, elected members, and officers on such matters.

Financial Implications: None

Legal Implications The revision provides greater clarity on the expectations of

the Licensing Authority and reduces potential inconsistency that could lead to legal challenge. No specific new negative implications are expected.

Equalities Impact Assessment See attached Appendix D

Other Material Implications: None

Exempt from Publication: NO

Background Papers: Statement of Licensing Policy 2019-2024 available via; <https://www.ashford.gov.uk/media/q0ijavn2/licensing-policy-2019-24.pdf>

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Agenda Item No. 5

Report Title:

Statement of Licensing Policy 2019-2023 (amendment)

Introduction and Background

1. The purpose of this report is to present to the Licensing Committee the results of the statutory consultation on the proposal to insert a new section into the Statement of Licensing Policy 2019-2024 with specific reference to the safety of women and vulnerable persons in certain alcohol licensed premises.
2. This paper follows the initial proposal to conduct a statutory consultation on the development of this policy area as outlined to the November 2021 meeting of the Licensing Committee. This work being in direct response to increasing national concern with reference to the safety of women and other vulnerable persons.
3. The copy the current Statement of Licensing Policy 2019-2024 is referenced in the background papers associated with this report.
4. At the time of writing this report, the authority current administer;
 - 24 club premises certificates
 - 438 premises licences, of which 264 are licensed for the on-premises sale/consumption of alcohol.

Proposal/Current Position

5. Following the statutory consultation, described later in this report, four responses were received.
6. A copy of each of the responses, and brief feedback is included at Appendix A
7. In response to the feedback received, the original proposed policy (Appendix B) presented at the November 2021 meeting of the Committee has been amended. The updated proposal is shown at Appendix C.
8. The updated amendments to the original proposal presented at the November 2021 Licensing Committee, based upon the consultation responses, include;
 - Adding expectations around having phone chargers available to allow women or vulnerable persons to charge their phone sufficiently to arrange their safe transport home.
 - Clarifying that posters should be installed in relevant conspicuous locations.
 - Adding an expectation of a zero tolerance toward non-consensual touching and misconduct towards women and vulnerable persons.

- Adding the expectation that any persons refused entry and also meeting the definition of 'drunk and incapable' are reported to Kent Police and/or Ashford Borough Council's CCTV Control Room via the Pubwatch scheme.
- Adding Ashford Partnership Against Crime (Shopwatch and Pubwatch operator) into the external organisations that the council remain committed to working with.
- Amending the requirement for booking taxis to '*booking such taxis where reasonably necessary (i.e. as part of an Ask for Angela incident)*' to make expectation clear that it is not a 'routine service' but applicable to where the circumstances make this a reasonable course of action.
- Removal of the 'suitably accompanied' expectation for intoxicated persons, as too vague. The point being covered by the addition of the 'drunk and incapable' expectation and the above taxi booking amendment.

Implications and Risk Assessment

9. The update to this policy is not anticipated to have any significant implications, other than the positive impacts associated with ensuring that the expectations of the Licensing Authority are clearly set out and published.
10. Judicial Review is a risk if the policy strays beyond the requirements of the Act, or restricts legal activities without due and appropriate cause

Equalities Impact Assessment

11. The policy will affect all persons involved in or affected by the relevant licensable activity in the borough, who may at times be considered potentially vulnerable due to gender, disability or other impairment.
12. Recipients of the policy include holders of licences, members of licensing sub-committee, authorities e.g. Kent Police, Kent Fire & Rescue Service, etc. and all of the borough's businesses, residents of the borough and those who visit and use local licensed premises.
13. An updated equalities impact assessment is attached as *Appendix D*

Consultation Undertaken

14. Consultation on amendments to the Statement of Licensing Policy is a statutory requirement.
15. The consultation ran from throughout December 2021.
16. Statutory consultees contacted with reference to this consultation include;
 - Kent Police
 - Kent Fire Rescue Service
 - Kent County Council Public Health

- Kent County Council Children’s Social Services
- NHS Clinical Commissioning Group
- Designated Premises Supervisors for premises within the borough (where an email was held on record)
- Premises licensees for premises within the borough (where an email address was held on record)
- Ashford Partnership Against Crime (Pubwatch operators)
- The Street Pastors
- Known SIA security providers with the local area
- Community Safety Unit/Partnership

17. In addition the consultation was published on the council’s public consultation and licensing webpages, and released on the council’s social media streams.

Other Options Considered

18. As a statutory requirement under the Licensing Act 2003, the Licensing Authority must publish a Statement of Licensing Policy.

19. Whilst the Statement of Licensing Policy must contain certain information as defined, the expectations of the Council are to an extent open to allow local considerations to be taken into account. It is therefore open to the authority to consider any alternate options with reference to this topic, so long as they are within the scope of the Licensing Act 2003, or alternatively not to develop a policy on this specific topic.

Reasons for Supporting Option Recommended

20. The adoption of this policy area is considered to be a logical approach to the nationally increasing awareness of the safety of women and ensures that the Licensing Authorities expectations are clear, concise, and understandable to all interested parties.

21. Whilst clearly the safety of women and vulnerable persons is more complex than the proposal before the Committee it is hoped that these expectations help to promote additional consideration by relevant premises, and hope to ensure that residents and visitors can continue to confidently enjoy the licensed offerings within the borough.

Next Steps in Process

22. Following adoption by Full Council the updated draft Statement of Licensing Policy will be published on the council’s website, and available at the Civic Centre.

23. The Statement of Licensing Policy will be subject to statutory review in 2024, along with any periodic review brought about by changes in the council’s approach, or change to relevant legislation

Conclusion

24. The amendment of this document is based on the need to protect women and vulnerable persons from the potential harms that can be associated with alcohol licensed venues.
25. It is recommended that the Licensing Committee recommend to Full Council that the proposed policy area is inserted into the Statement of Licensing Policy 2019-2024.

Portfolio Holder's Views

26. "I fully support the development of this policy area, which interacts with other positive measures being taken by the council and its Community Safety Partners, especially surrounding the Safer Streets grant funding awarded to Ashford Borough Council.

The council support a vibrant evening and night time economy across the borough, and continue to recognise the input everyone can make to ensuring that visitors and residents alike can continue to socialise in a safe and responsible manner"

Councillor Peter Feacey

Contact and Email

27. Trevor Ford
Environmental Protection and Licensing Team Leader
(01233) 330 397
trevor.ford@ashford.gov.uk

Appendix A: Consultation responses

Appendix B: Original draft policy (presented to Licensing Committee Nov 21)

Appendix C: Updated draft policy (post consultation)

Appendix D: Equalities Impact Assessment

Appendix A: Consultation responses

Response 1

From: [unknown]

Sent: 29 November 2021 21:31

To: Licensing <Licensing@ashford.gov.uk>

Subject: Licensing Act 2003 Policy - Safety of Women and Other Vulnerable Persons

Good Evening,

Firstly, I would like to thank the council for taking steps to improve the safety of women through the review of the Licensing Act 2003.

I have reviewed the policy amendment and remain concerned that it places a heavy responsibility on vulnerable people to come forward for help. The heavy promotion of "Ask Angela" is good but surely can't be the only means of keeping women safe. For example, I have been in the town and bouncers have refused entry to young women who already appeared to be worse for wear and have left them to wander off down the high street alone. My concern is that these requirements in your policy apply to those on the premises already and really we need staff to take responsibility for patrons inside AND seeking to gain entry.

Where is the zero tolerance to non-consensual touching and misconduct towards women and vulnerable people? We are essentially leaving too much of the decision making to the staff to "discourage" certain behaviours. The directives are not clear enough. Remember, bouncers are predominantly male and have also been known to touch up women too?! Their definition of what is acceptable behaviour and what isn't is subjective to their own personal preference. So what "active bystander" training is being advocated here? Or are we just leaving the manager to give the staff a few tips and that is considered "training"?

"Displaying posters" on site is open to wide interpretation. What posters in particular? Is 1 poster in a remote corner of the pub enough? Because the chances of a guy reading a poster in a bar is pretty slim. If he has predator behaviours, he is only looking at the women, not the posters. So what is being displayed in men's toilets? We need LOUD and CLEAR messages about what open, verbal consent looks like because many men either don't know or don't care.

Also, what are the sanctions for non-compliance? Who checks the incident book is being maintained? What purpose is the incident book if it is just a log of misconduct - where is the directive as to what they should do with the incident book?? How many incidents are not acceptable and someone in charge of the premises is fined? How is this information shared across pubs in the local area? For example, if a guy shows up on 3 incident books but no one is sharing the information he gets to move freely without anyone keeping an eye on him? Let's not increase the bureaucratic burden on staff trying to work,

just for the sake of keeping a log. We need to DO something with the log or it's pointless.

Why can't we make premises with more than 5 members of staff (or whatever level you feel appropriate) have a designated "welfare" member of staff who responds to issues / concerns at the premises? Because at the moment, if it is a large pub / club and a member of staff has a word with a guy at the back of the pub and then another member of staff has a word with the same guy out the front in the smoking area....neither know that this guy has been warned once already about his behaviour. Whereas, a designated welfare lead would be called to speak to him on both occasions and can join up the dots! Appropriate and timely action can then be taken. Also, a designated lead in the welfare of women and vulnerable people would be solely focused on just that and they wouldn't be distracted by other duties.

Does anyone have any thoughts about women only zones in large premises? Safe zones for women who have: lost their friends, need to charge their phone, just escape from someone making them feel uncomfortable, rest a while somewhere safe without being on their guard all the time etc?

What about social media restrictions? Any ideas on whether images being posted to social media should / could be delayed by 24 hours to give women a chance to get home safely? (Thinking about stalking or women who suffer controlling behaviour by their partners).

Sorry if my ideas are all a little rubbish! I hope there is something in there which is useful to you?

With every good wish,

Licensing Team Comments

Premises taking responsibility for persons refused entry - Although the principle of this idea is positive, it is not anticipated to be practical or within the scope of the Licensing Act for the premises to take responsibility for persons who may have been drinking and who are refused entry. It is however reasonable to expect that should any person be considered to meet the definition of drunk and incapable, then this should be reported to the Police and/or CCTV through the Pubwatch system. This expectation has been included in the updated policy draft,

Zero-Tolerance - The comments with regard premises adopting a zero tolerance approach to non-consensual touching and misconduct towards women and vulnerable people are noted, and have been included in the final policy draft.

Active Bystander training - Whilst this training is being offered through the Safer Streets grant funding awarded to Ashford Borough Council, longer term this training may need to be delivered in house by premises management. It is not possible, at this time, to specify an exact training package for premises.

Posters - As this policy has ongoing implications and may span varying initiatives, it would not be appropriate to specify the exact posters that should be applied, or the most appropriate place for these within the premises as this would be dependent on

the intended audience for any particular public safety campaign and the individual layout of the premises in question.

Non-compliance - The measures set out in policy are expectations, and cannot be automatically applied to premises licences. They may however be offered as conditions by a new premises applicant, or in negotiation with Kent Police. In addition these expectations may be cited in the event that Kent Police call for a premises review on related grounds. By having these expectations published, they can guide Committee Members as to the measures that they should be expecting premises to apply.

Designated welfare staff - This suggestion is not considered practical from an operational perspective. Security staff for large premises such as nightclubs, already operate radio systems and such concerns surrounding 'routine' disorder issues are not commonly found in the experience of the Licensing team.

Women only zones within premises - An expectation that a premises sub-divide a premises to include a women only zone is not considered practical or reasonable.

Social media restrictions - It is noted that posting of photographs etc. may be undertaken by any customer, entertainment provider (bands etc.) as well as the business itself, and for this purpose any such expectation would not be considered practical or enforceable.

Response 2

From: [A premises licence holder within the borough]
Sent: 30 November 2021 14:54
To: Licensing <Licensing@ashford.gov.uk>
Subject: RE: Licensing Act 2003 Policy - Ashford Borough Council

Thank you for the email below,

We would not have any negative input to the amendments suggested, we would fully support the inspiration and the changes.

I hope these comments help.

Licensing Team Comments

Feedback noted.

Response 3

From: [A premises licence holder within the borough]
Sent: 10 December 2021 13:07
To: Licensing <Licensing@ashford.gov.uk>
Subject: Reply email regarding Licensing act 2003

Hi licensing team

As your email dated 24-11-2021 licensing act 2003 policy,,

I would just like to make one or two suggestions.. although 9 out of 10 of these remarks I total believe in and that all license premises should be doing it anyway, I am just a little bit concerned regarding lots of posters.

I can see that if you wanted me to put up posters in prominent areas I would have five maybe six just in the female toilets alone... I think most licensed premises lack advertising space in toilets amongst other things that are being advertised as well and obviously including our own promotions.

These are some of the awareness notices you would be asking for , some we already do...

Pubwatch scheme "Don't Get Barred "
Challenge 21
Drug awareness
Ask Angela scheme
License taxis advice
CCTV awareness notices
Availability for Free tapwater / soft drink
Availability for drinking spiking devices / drink testing strips

I would like to suggest maybe condensing some of these points into generic A1 posters maybe simply called " Safer Night Outs" rather than numerous adverts dotted around the prominent areas that you are suggesting...

Also I think the part where take action to ensure women and vulnerable persons leave the venue safely for example providing numbers for licensed taxi services is fine which is what's happens here , but booking such taxi services where necessary on request I think could be opening a whole can of worms... and how would we ensure that any person appearing to be intoxicated are suitably accompanied ? I think more explanation is needed for this please....

One last thing to add I think you may have forgotten APAC in your external shout out organisations 😊

Many Thanks

Licensing Team Comments

Number of posters – Comments noted. We recognise that the proposed policy would expect that public information posters are displayed in premises, ranging from those assisted with the 'Ask for Angela' or similar schemes for the majority of premises, to the provision of free drinking water etc. This is on top of any other posters that may be required by a premises licence conditions or that may be pro-actively used by a licensee. We also recognise that the nature and size of the premises in question would dictate the number and type of posts that would be suitable. In some cases a larger number of posters may be suitable, whilst in smaller premises it might be

suitable to combine several elements into one suitable poster. As such based on the variability of venue types and sizes it is not proposed to define a specific number or type of posters that should be displayed, as there is clearly no one-size-fits-all approach that can be applied.

Leaving the venue safely – We note the comment surrounding the booking of taxis, and ensuring that persons appearing intoxicated are suitably accompanied. With reference to the booking of taxis, although the circumstances will vary, it is proposed to update the wording to ‘booking such taxis where reasonably necessary’ to show that this is not necessarily something that would be a ‘routine service’ but something could be expected if the circumstances required (for example as part of an ‘Ask for Angela’ incident. With reference to ‘suitably accompanied’ it is recognised that the wording used may be unclear and vague. The intention was to ensure that a premises should take reasonable measures to ensure that a person who could be considered drunk and incapable is not simply left outside the premises or in a position whereby they could be taken advantage of. This is partly addressed through the addition of the ‘drunk and incapable expectation, but also through the booking taxis where reasonably necessary wording. As such this latter part has been removed from the proposed policy.

External partners – Comment noted, and Ashford Partnership Against Crime added to the proposed policy.

Response 4

From: [unknown]
Sent: 19 December 2021 14:36
To: [REDACTED] Licensing
<Licensing@ashford.gov.uk>
Subject: Consultation

To whom it may concern

First sorry for the late entry was in two minds in giving any feedback at all as measures look like just a quick copy and paste of the ask Angela scheme done under the radar in the run up to Christmas and new year. Looks like a bit of a hurriedly researched project really that barely scratches the surface of the issues involved.

Also got mugged recently which has meant I have been kind of pre occupied.

Copied [REDACTED] in as if it was not for him like a lot of other people would be unaware that that initiative even happening and did not receive any correspondence after signing up to this Consultation.

Personally shocked at the tragic events of violence against women earlier this year, the connections to Ashford really did bring things home, so did do some research around the issues involved around public safety earlier this year. Also have some research experience.

“Ask for Angela’ was originally developed by Lincolnshire County Council and adopted by the Met in 2016 as a localised initiative by its police licensing officers.”

So scheme does have the benefit of being around for awhile with the disadvantage of being a pre covid scheme that means it could not take into consideration the impact of covid on the nighttime economy.

Think the measures in the Ask for Angela Scheme are good common sense ones but there are barriers to successful implementation. Will take some training of staff at the venue this when the venue are already very stretched both with staff levels and monetary wise.

<https://www.bighospitality.co.uk/Article/2021/11/29/Omicron-Coronavirus-variant-restrictions-hospitality-night-time-economy>

<https://www.theguardian.com/music/2021/oct/11/night-time-cultural-sector-hit-with-86000-job-losses-due-to-covid-19>

Need a carrot and stick approach which brings up a lot of questions...will venues lose licences if they do not sign up to the scheme or be fined...can they claim the cost of training... will they be able to recruit extra staff and pay them..will venues be considered to have a duty of care for clients after they have left the premises...what happens if they sign up to the scheme but just go through the motions of implementing it...

Thats just with this scheme though other schemes would of course be facing the same kind of problems (of course would be interested in any feedback about other schemes considered and why they were rejected).

“Take action to ensure women and vulnerable persons leave the venue safely, for example; providing numbers for licensed taxi services, booking such taxis where necessary or requested, and, ensuring that any persons appearing intoxicated are suitably accompanied.” Of course most of the problem is after people leave the venue not at the venue at all there was a “888 'walk me home service” floated but I looked at it and it does have some major flaws but certainly measures are needed to help people when they are at their most vulnerable which is largely not at the venues but on the way home from them.

I could comment more but maybe any measures brought in would be an improvement on the current situation and as you have given yourselves inadequate time to come up with measures that can be much more than a partial solution i can see you revisiting and evolving solutions over time.

Licensing Team Comments

Covid19 - The impacts of the pandemic on the evening and night time economy is understood and has been considered as part of the proposed draft policy.

Non-compliance – see comments to consultation response one.

Training costs – training of staff is the responsibility of the premises licence holder, however support may be offered through the Community Safety Partnership, such as the ‘active bystander’ training which is being provided free of charge to relevant premises and individuals through the recently allocated Safer Streets grant funding.

General – Some comments were raised with respects to the adequacy of the consultation, with the consultation process being explained in detail in the relevant section of this paper. We would however highlight that the proposed policy is a ‘starting point’ in terms of outlining the licensing authorities’ expectations, and in terms of this multifaceted issue the introduction of a specific licensing policy can only be a partial solution to the wider issue. The Statement of Licensing Policy will be subject to regular review.

The Safety of Women and Vulnerable Persons

Ashford Borough Council recognise increasing national concern with reference to the safety of women and the late night economy, especially related to harassment, drink spiking, and getting home safely. These concerns also extend to other persons who may be considered vulnerable as a result of drink and drugs, as well as physical and mental health conditions.

It is therefore considered more important than ever for relevant premises put in place measures to protect women and vulnerable customers so that they can remain safe at their premises and also after leaving.

It is consequently expected by the Licensing Authority that any premises with a significant percentage of sales revolving around consumption of alcohol on the premises will;

- Train all front of house staff on being an '*active bystander*' so that they know how to spot and address safety and harassment issues relating to women and vulnerable persons.
- Adopt, and train all staff, to operate the '*Ask for Angela*' scheme, or similar schemes.
- Take every report of harassment and sexual intimidation seriously and take appropriate action, recording these matters within a premises incident book.
- Take active steps to support persons who report harassment or sexual intimidation which might take place in their premises.
- Demonstrate to staff and customers that the business takes women's and vulnerable persons safety seriously, for example through the promotion of the '*Ask for Angela*' scheme, by installing suitable posters [*example attached*]
- Make customers aware of the availability of free tap water or other free soft drinks (where offered)
- Take action to ensure women and vulnerable persons leave the venue safely, for example; providing numbers for licensed taxi services, booking such taxis where necessary or requested, and, ensuring that any persons appearing intoxicated are suitably accompanied.
- And all late-night premises, nightclub, or bars are additionally expected to;
 - Prominently display high visibility posters which discourage harassment and promote safety issues, such as the '*Ask for Angela*' scheme, anti-drink spiking posters.

- Prominently display posters highlighting the availability of free drinking water (and other free soft drinks where offered)
- Provide free anti drink spiking devices to customers, such as bottle stoppers and drink testing strips.

In addition to the expectations placed on licensed premises, the authority is committed to supporting and contributing to relevant programmes and interventions supporting safety in the night time economy in co-operation with internal services such as; Community Safety and the Ashford Monitoring Centre, and external organisations such as; Kent Police, the Kent & Medway Licensing Steering Group and Kent County Council Trading Standards.

Appendix C: Updated draft policy (post consultation)

The Safety of Women and Vulnerable Persons

Ashford Borough Council recognise increasing national concern with reference to the safety of women and the late night economy, especially related to harassment, drink spiking, and getting home safely. These concerns also extend to other persons who may be considered vulnerable as a result of drink and drugs, as well as physical and mental health conditions.

It is therefore considered more important than ever for relevant premises put in place measures to protect women and vulnerable customers so that they can remain safe at their premises and also after leaving.

It is consequently expected by the Licensing Authority that any premises with a significant percentage of sales revolving around consumption of alcohol on the premises will;

- Operate a zero tolerance approach to non-consensual touching and misconduct towards women and vulnerable people.
- Ensure that any persons meeting the definition of 'drunk and incapable' are reported to Kent Police and/or Ashford Borough Council's CCTV Control Room via the Pubwatch scheme.
- Train all front of house staff on being an '*active bystander*' so that they know how to spot and address safety and harassment issues relating to women and vulnerable persons.
- Adopt, and train all staff, to operate the '*Ask for Angela*' scheme, or similar schemes.
- Take every report of harassment and sexual intimidation seriously and take appropriate action, recording these matters within a premises incident book.
- Take active steps to support persons who report harassment or sexual intimidation which might take place in their premises.
- Demonstrate to staff and customers that the business takes women's and vulnerable persons safety seriously, for example through the promotion of the '*Ask for Angela*' scheme, by installing suitable posters [*example attached*] in conspicuous and relevant locations within the premises.
- Make customers aware of the availability of free tap water or other free soft drinks (where offered)
- Have phone charger(s) available to allow a customer, where requested, to charge their phone sufficiently to arrange their safe transport home.

- Take action to ensure women and vulnerable persons leave the venue safely, for example; providing numbers for licensed taxi services, and, booking such taxis where reasonably necessary (i.e. as part of an Ask for Angela incident).
- And all late-night premises, nightclub, or bars are additionally expected to;
 - Prominently display high visibility posters which discourage harassment and promote safety issues, such as the 'Ask for Angela' scheme, anti-drink spiking posters.
 - Prominently display posters highlighting the availability of free drinking water (and other free soft drinks where offered)
 - Provide free anti drink spiking devices to customers, such as bottle stoppers and drink testing strips.

In addition to the expectations placed on licensed premises, the authority is committed to supporting and contributing to relevant programmes and interventions supporting safety in the night time economy in co-operation with internal services such as; Community Safety and the Ashford Monitoring Centre, and external organisations such as; Kent Police, Ashford Partnership Against Crime, the Kent & Medway Licensing Steering Group and Kent County Council Trading Standards.

Appendix D: Equalities Impact Assessment

Lead officer:	Trevor Ford
Decision maker:	Full Council
Decision: <ul style="list-style-type: none"> • Policy, project, service, contract • Review, change, new, stop 	To agree to the insertion of an amendment to the Statement of Licensing Policy 2019-2024, containing policy relating to the safety of women and vulnerable persons.
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	3 March 2022
Summary of the proposed decision: <ul style="list-style-type: none"> • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected? 	The report seeks to approve a policy approach to the safety of women and other potentially vulnerable persons within certain alcohol licensed premises. It is expected that members of the general public may be affected by the policy by means of increasing public safety. Businesses providing alcohol sales for consumption on the premises will also be affected as to the expectations associated with their premises type.
Information and research: <ul style="list-style-type: none"> • Outline the information and research that has informed the decision. • Include sources and key findings. 	Research conducted as part of the revision of the policy includes; <ul style="list-style-type: none"> • Best practice guidance • Local circumstances (Safer Streets funding etc)
Consultation: <ul style="list-style-type: none"> • What specific consultation has occurred on this decision? • What were the results of the consultation? • Did the consultation analysis reveal any difference in views across the protected characteristics? • What conclusions can be drawn from the analysis on how the decision will affect people with different 	See report for full details of the statutory consultation process.

protected characteristics?		
<p>Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.</p> <p>When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.</p>		
Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u> Elderly	Low	Neutral
Middle age	Low	Neutral
Young adult	Low	Neutral
Children	Low	Neutral
<u>DISABILITY</u> Physical	High	Positive major
Mental	High	Positive major
Sensory	High	Positive major
<u>GENDER RE-ASSIGNMENT</u>	Low	Neutral
<u>MARRIAGE/CIVIL PARTNERSHIP</u>	Low	Neutral
<u>PREGNANCY/MATERNITY</u>	Low	Neutral
<u>RACE</u>	Low	Neutral
<u>RELIGION OR BELIEF</u>	Low	Neutral
<u>SEX</u> Men	Low	Neutral
Women	High	Positive major
<u>SEXUAL ORIENTATION</u>	Low	Neutral

Mitigating impact:	negative	N/A
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Where any negative impact has been identified, outline the measures taken to mitigate against it.

Is the decision relevant to the aims of the equality duty?

Guidance on the aims can be found in the EHRC's Essential Guide, alongside fuller PSED Technical Guidance.

Aim	Yes/No
1) Eliminate discrimination, harassment and victimisation	Yes
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	Yes

Conclusion:

- Consider how due regard has been had to the equality duty, from start to finish.
- There should be no unlawful discrimination arising from the decision (see guidance above).
- Advise on whether the proposal meets the aims of the equality duty or whether adjustments have been made or need to be made or whether any residual impacts are justified.
- How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported?

The legislative provisions relevant to this Statement of Principles for Gambling provides for the protection of children and vulnerable persons.

The re-publishing of the statement of principles are not considered to have any negative impacts on equality

Monitoring of the policy will be undertaken formally prior to expiry (three years). Additional review may be required should there be any change in legislation or a particular urge to change Council policy during the lifetime of the document.

In addition the council's revised policy register will assist the service to meet this

EIA completion date:	14 December 2021
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