Institute of Licensing

Link

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Free lotteries or unregulated gambling on an incredible scale?

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IoL Regions

www.instituteoflicensing.org

Email: info@instituteoflicensing.org
Tel: 01749 987333

Foreword

By Sue Nelson, Executive Officer

Welcome to the Spring Edition of LINK. The 17th edition comes to you hot on the heels of the Gambling White Paper and the draft legislation for Martyn's Law. Consultations on Regulatory Easements under the Licensing Act, mandatory special procedure licensing in Wales, the late-night levy, visitor accommodation licensing in Wales and alcohol advertising and promotion in Scotland have all concluded this Spring and we await those results. Meanwhile there are several other consultations of relevance which are open as I write, including the taxi reform proposals in Wales, review of community safety partnerships and the uses and controls of nitrous oxide.

In conclusion there are plenty of changes in licensing and related law and practice under consideration at the moment, giving lots of opportunity for discussion, debate and articles!

It is a good opportunity to remind everyone that National Licensing Week is just around the corner. Running this year from 12th – 16th June, it is a great opportunity to raise awareness of licensing, shout out about your organisation and the work that you are involved in, highlight initiatives that you are part of or involved in and remind everyone of the magnitude of licensing involvement in business, home and family lives, urban centres by day and by night, transport links and so much more. Get involved, and let us know what you are doing. https://licensingweek.org/ @licensingweek #NLW2023

In this edition of LINK, Gerald Gouriet KC has set out the position in relation to free lotteries, a timely examination of the statutory provision that enables a lottery with a choice of free entry to escape regulation under the Gambling Act 2005. Continuing the gambling theme, Kerry Simpkin outlines the White Paper proposals relating to land-based gambling, while Simon Reynolds talks us through Buzz Bingo operations and their focus on customer welfare and the provision of supervised, cohesive social entertainment which goes further than the simple provision of gambling activities.

We are delighted to include an article by Drinkaware's new CEO Karen Tyrell as she outlines Drinkaware's new strategy which aims to influence social attitudes towards alcohol. IoL Chairman Daniel Davies has recently been involved in a community project designed to engage with residents living in hostels with a view to addressing substance misuse and to get support to those individuals benefitting them directly and the local community indirectly. 'We've got HeART' featured on Crimewatch as a result of the level of interest locally and nationally in the project.

Turning to hackney carriage and private hire licensing, we look at a current issue concerning buckle guards, and the fact that the use of such devices is illegal. Licensing authorities will want to be aware of the position here given that many vehicles used for home to school transport may also be more widely used for hackney carriage and private hire purposes. We welcome Jill Morgan's article setting out the position on cross border hirings – an issue which crops up regularly and has done now for many years with no resolution in sight,

Animal welfare is close to most of our hearts, and since The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 were published the licensing of animal activities has grown in profile across most licensing authorities. Stewart Broome shares his first-hand experience of a case which is still not fully concluded, involving a premises where he expected to find 16 dogs, only to leave with 29 out of the 44 found on the premises. It clearly illustrates the need to expect the unexpected and to prepare for as many eventualities as possible. It's a pleasure to also include an article on the RSPCA PawPrints scheme which is an award scheme aimed at local authorities and acknowledges their role at the forefront of delivering animal welfare legislation in the UK. The award recognises and celebrates local authorities for delivering animal welfare services which go above and beyond minimum statutory service levels.

Robin Edwards looks at the position in relation to Scrap Metal licensing enforcement, and we are hoping to work with Robin to expand our training offer on scrap metal licensing in due course. Last but not least we welcome the article from Edward Lamberti from the BBFC, in which he sets out the BBFC role and processes in relation to the classification of films. Many of you will have heard from the BBFC at regional meetings recently, and they are currently consulting on their classification guidelines. The extent of training and standardisation which is undertaken to ensure consistent and robust film classification is clear from the article, as is the care taken to ensure that BBFC ensure that they remain in step with changing laws and social expectations.

As always, we are grateful to our contributing authors for enabling us to provide another packed edition of LINK. If you have a case of interest, a local initiative or simply an area of licensing that you are interested in writing about, please get in touch. We enjoy and benefit enormously from the many and varied articles which are offered for inclusion and we are continuously looking to improve our publications so ideas and suggestions are also very welcome.

The Problem with Free Lotteries

By Gerald Gouriet KC, Francis Taylor Building

The 'choice of free entry' has given unlicensed operators carte blanche to run commercial lotteries with impunity

(This is a shorter version of an article I posted on my Website on 6 March 2023)

Introduction

Running a lottery for profit is supposed to be unlawful. The Gambling Commission summarises the prohibition in broad terms: "Lotteries can only be run either to raise money for good causes or for fun. They cannot be run for private or commercial gain" That was certainly the intention of the Gambling Act 2005 ("the 2005 Act"); and if 'lottery' is given the restricted meaning provided by section 14, the Commission has accurately summarised the law. But that doesn't reflect reality. There are dozens of what most of us would call lotteries run for profit these days: on television, on the radio, over the Internet – I see one or more promoted every day – and to judge from some of the intensive advertising campaigns, it is not fanciful to suspect that substantial commercial gain is achieved.

How do they get away with it? The answer is that a lottery promotion with a choice of free entry is not regulated by the 2005 Act – even if the so-called 'free' choice proves to be more expensive than paying, is less convenient, and few people (if any) want to take advantage of it.

Before the Gambling Act 2005

Things were very different before the 2005 Act came into force: common-sense prevailed. In Singette Ltd. V Martin, Lord Pearson said:

> "In deciding whether a competition is a lottery or not a realistic view should be taken and regard should be had to the way in which the competition is actually conducted."

–and he cited a string of cases to that effect, dating from 1883 to 1967.

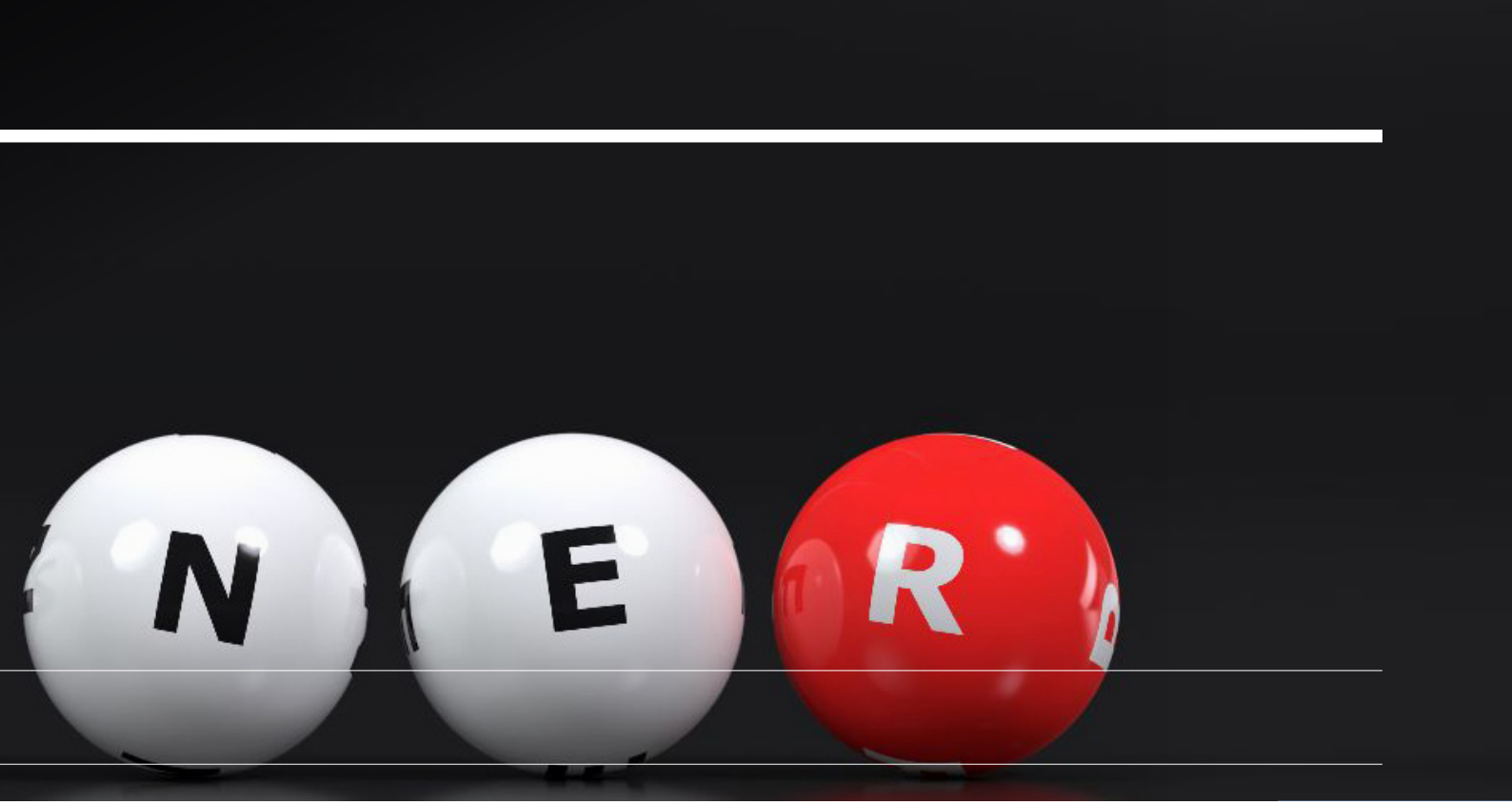
In Reader's Digest Association Ltd. V Williams, Lord Widgery gave the classic common-law definition of a lottery:

> "A lottery is the distribution of prizes by chance where the persons taking part in the operation, or a substantial number of them, make a payment or consideration in return for obtaining their chance of a prize." [the italics are mine]

So even if it were possible to enter free of charge, if a substantial number of people in fact paid, Lord Widgery would find a lottery.

Mr. Justice Caulfield famously expressed himself bluntly (and with a trace of impatience) in the same case:

> "I would not like to define a donkey. I would not like to define a lottery. But the fact that I do not define



does not prevent me from recognising a donkey or a lottery when I see it. I think the approach to cases of this sort is to examine the facts, and not then to decide whether or not the facts satisfy a particular definition., but whether the court can then declare that the facts show a lottery."

Common sense and reality were the order of the day. Until 2005.

The 2005 Act: statutory 'choice of free entry'

Paragraph 8 of Schedule 2 to the 2005 Act provides -

Paragraph 8(1)

For the purposes of section 14 and this Schedule an arrangement shall not be treated as requiring persons to pay in order to participate if under the arrangement—

(a) each individual who is eligible to participate has a choice whether to participate by paying or by sending a communication,

(b) the communication mentioned in paragraph (a) may be—

(i) a letter sent by ordinary post, or
(ii) another method of communication which is neither more expensive nor less convenient than entering the lottery by paying,

(c) the choice is publicised in such a way as to be likely to come to the attention of each individual who proposes to participate, and

(d) the system for allocating prizes does not differentiate between those who participate by paying and those who participate by sending a communication.

Paragraph 8(2)

[ordinary post means ordinary first-class or second-class post]

If an arrangement is not to be treated as requiring a person to pay in order to participate, it is not a lottery within the definitions given by section 14 of the 2005 Act. This means that an unlicensed lottery promoter who offers the choice of 'paid entry' or 'free entry by post' is given carte blanche to proceed with a profit-making lottery. It doesn't matter that few people exercise the free-entry choice. It doesn't even matter if, in the event, everyone pays to enter.

A number of lottery promoters exploit this. Some television programmes invite their audiences to text a 5-digit number for "a chance to win" a large sum of money. "Text 'WIN' to 12345" is a typical promotion. The text costs the caller a pound or two over and above the standard rate. They don't need to do anything other than text the given number: the payment appears on their phone bill as a charge at the relevant premium rate. Entry to the lottery is completed in a matter of seconds. The 'free entry' alternative amounts to sending contact details on a card or in a letter and posting it to a given address. It is doubtful whether many people exercise that choice. Convenience is a factor: the ease of texting "WIN" to a 5-digit number contrasts favourably with the time and trouble of writing, addressing, finding a stamp and posting a letter.

Other on-line lotteries offer substantial property prizes, valued in the millions, together with luxury cars and thousands of pounds in cash. There is more to entering these than sending a simple text message on a mobile phone. Payment (if the 'free' route is not taken) is no different from it

is with any other on-line purchase: a couple of mouse-clicks take one to 'express checkout' by Apple-Pay or PayPal, with the slightly longer option offered of providing Mastercard, Visa or AMEX card details. On one such website I recently visited there is a range of choices for entering via the paid route, with 15 entries for £10, 40 entries for £25, 85 entries for £50, and 320 entries for £150. Thus, the more entries you buy, the cheaper each is – which the website is at pains to point out.

Again, the balance of convenience is likely to be a factor in deciding whether to take the 'free' route or the 'paid-for' route. There is a maximum of one free entry per postcard or envelope sent/received. So, if I wanted to enter 15 times, I would need to send 15 letters/cards. Similarly, if I wanted to enter (free of charge) 40, 85 or 320 times – all of which are single-purchase packages on the paid-for route – I would need to send 40, 85 or 320 letters/cards.

Cost is another factor. On this particular site, someone who pays £150 for 320 entries online does so for considerably less money than the £240 postage (second class at today's rate) that they would have to find for 320 so-called 'free' postal entries. Even £10 for 15 paid-for entries is cheaper than £11.25 in postage for 15 'free' entries.

Paragraph 5 of Schedule 2 to the Act provides that the expense of sending a letter by ordinary post does not count as 'payment' to enter a lottery. The paragraph turns a blind eye to what most people would regard as 'free', and whether a 'choice of free entry' saddled with a substantial postal charge is a choice likely to be exercised. If the message needs to be spelled-out more clearly –

320 'paid-for' entries cost **£150**
320 'free' entries cost **£240**

I know which I would choose!

Does it matter?

The question may be asked: does it matter? A number of considerations suggest the answer:

I. It is perhaps reminiscent of the Mad Hatter's tea party or a plot from a Gilbert and Sullivan operetta, and it brings the law into disrepute, that a commercial lottery is lawful if it is promoted with a choice of free entry that no one takes, but is unlawful if it is promoted without a choice of free entry that no one would take if there were one. What is the mischief in the unlawful lottery that is not precisely replicated in the lawful one?

II. Then there is the normalisation of gambling to children, and even the spectacle of children actually gambling. Anyone with a mobile phone can enter the 'text-to-win' lotteries. There is no age-verification. To test the situation, I recently entered one of the lotteries promoted on television. I typed "WIN" as the text message and sent it to the 5-digit number on the TV screen. I received an instant reply: "£2 entry confirmed. Text Win again and we'll add 2 entries for the price of 1!". There was nothing to stop a child doing exactly as I had done – and being encouraged to gamble again, exactly as I had been encouraged.

III. Some commercial lotteries dress themselves up as charitable. They boast of high percentages of their net profits going to well-known charitable causes. The genuine charitable lotteries in the UK have to give a minimum of 20% of their proceeds to good causes, and they are prohibited from making a profit. I hope it is not too cynical of me to wonder if the commercial lotteries' net profits (from which a slice is taken for charitable purposes) are calculated after salaries and bonuses are paid to the directors and shareholders? I regularly hear complaints from charities that commercial lotteries clothing themselves as charitable lotteries are diverting much needed funds away from good causes.

IV. Unregulated commercial lotteries, saved from prosecution by a token 'choice of free entry', are not required to have (and probably do not have) any social responsibility codes, problem gambling codes, affordability checks, or Know Your Client or Anti Money Laundering policies. No software licence is required for the manufacture of the random draw element: there are no technical standards to be complied with to ensure a truly random and fair draw.

V. There is no reason to suppose that those ultimately in charge are suitable to run a gambling business. Applicants for operating licences have to demonstrate suitability, which the Gambling Commission explains by reference to the identity of the ultimate owners of the business, their financial circumstances (past and present) and whether they have the resources necessary to operate a gambling business, their proven honesty and trustworthiness, their competence (experience, qualifications etc.), and any criminal record. No such assessment, or any assessment of any kind, is made of the people who promote unregulated lotteries. There is no one with authority to do so.

Conclusion

Postal free entry routes are an anachronism in the digital age. It is to my mind absurd that what would otherwise be an unlawful lottery is given legitimacy by the simple expedient of providing a choice of free entry by post, which on analysis can be more expensive and far less convenient than a paid-for entry, and may never even be used.

The consequence is unregulated gambling on a scale which I would not have thought credible until I began to research this article.

The Jeremy Allen Award 2023

Nominations for the 2023 Jeremy Allen Award will open soon!

This award is open to anyone working in licensing and related fields and seeks to recognise and award exceptional practitioners.

Crucially, this award is by 3rd party nomination, which in itself is a tribute to the nominee in that they have been put forward by colleagues in recognition and out of respect to their professionalism and achievements.

The nomination period for the 2023 award runs from 12th June and nominations are invited by 3rd parties by no later than 8th September 2023.

Please email nominations to info@instituteoflicensing.org and confirm that the nominee is aware and happy to be put forward. For full details including the nomination criteria, please click here. We look forward to receiving your nominations.

Celebrating our previous JAA winners

2022
Yvonne Lewis

2021
Andy Parsons

2020
No Award due to Covid-19

2019
David Lucas

2018
Stephen Baker

2017
Claire Perry

2016
Bob Bennett

2015
Jane Blade

2014
Alan Tolley

2013
David Etheridge

2011
Alan Lynagh

2012
Jon Shipp

Government White Paper on Gambling Reform – The proposals for land-based gambling

By Kerry Simpkin, Head of Licensing, Place and Investment Policy, Westminster City Council.

The long-awaited government White Paper "High stakes: gambling reform for the digital age was published on the 27th April and sets out its proposals for Gambling reform in the UK. The proposed reforms to the Gambling Act 2005 (2005 Act) are necessary as several elements of the 2005 Act are now seen to be outdated and not in tune with the technical advancements the gambling sector have made since its introduction. There will be debate on whether the proposals within the paper are adequate, go too far or don't go far enough. The main headlines have rightly been directed at the proposals for tackling online gaming harm. However, the proposals for land-based gambling haven't been widely discussed.

Chapter 5 of the governments white paper sets out the submissions, considerations, and proposals for land-based gambling operations. This chapter will be of particular interest to local authorities and land-based gambling operators as there are significant proposals contained within it.
The land-based casino sector is going to see some changes that they have been calling for some time. These proposals include:

- adoption of the rules for casinos under the 2005 Act to the wider casino estate.
  A proposed increase in the machine allowance and table ratios for converted casinos premises (those that held a 1968 licence prior to the introduction of the 2005 Act) so they have the same entitlement as Small casinos.
- there will be further consultation on how casinos will be able to opt to choose this allowance and ratio over current entitlements along with the fee and mandatory conditions.
- casinos will be able to offer sports betting alongside other activities.
- the government will take steps to free up unused 2005 Act casino licences where there is no prospect of them being used and look to reallocate to other areas of the Country where there is demand.
- There will be limited changes to the 2005 Act to all casinos to offer credit to non-UK residents, with appropriate checks and balances in place.
- further consideration will be given to allowing a wider range of games on electronic terminals at casinos.

The paying for goods and services via our phones, online bank transfers or via touchless payment is something we are all used too. However, the 2005 Act, which was developed before or during the infancy of electronic payments has retained restrictions on the use of predominantly cash for gambling activities. This is now seen to be outdated and DCMS, along with the Gambling Commission will be looking to consult on options for cashless payments in the future. However, those options must ensure that player protections are in place before any restrictions are removed.

I have seen several innovative ways the bingo sector has developed and utilised technology to increase opportunities for growth. The sector has found a number of ways to increase the amount of higher stake (category B) gaming machines within their premises through the use of smaller terminals or tablet style gaming machines. As with Adult Gaming Centres, Bingo premises have a entitlement for up to 20% of the total gaming machines being made available for use being category B machines and the remaining 80% must be category C or D machines, the 20/80 ratio. In practice this has meant that within high street bingo premises most of the floor space is taken up by traditional style cabinet machines with are predominantly the 20% of the category B gaming machines. The remaining 80% of category C and/or D machines are, in the case of tablet style machines located in racks around the premises or for the smaller terminals located between the larger machines.

The government are proposing to change the ratio from the current 20/80 ratio to a 50/50 ratio for bingo and arcade venues (Adult Gaming Centres). This will mean that bingo and Adult Gaming Centres will be able to provide the same number of category B machines as they will C or D machines. This is something that will cause some concern to local authorities as there has been a call to limit the number of machines further in bingo premises as it has been argued that high concentrations of category B machines could have a wider impact of the most vulnerable in some areas.

The government also propose some other minor changes and opportunities for the land-based bingo sector which includes:

- the Gambling Commission undertaking a review of the gaming machine technical standards to assess the role of session limits in Category B and C machines and the role of

safer gambling tools.
- change the 2005 Act, when parliamentary time allows to enable opportunities for pilots for new machine games to enable testing under certain conditions with close oversight from the Gambling Commission and allow trials of linked gaming machines in venues other than casinos.
- explore other legislative options and conditions under which licensed bingo premises might be permitted to offer side-bets in a more flexible or expanded from but subject to rules to reduce the risk of harm.

Several local authorities have been calling for more powers under the 2005 Act to better control gambling within their area. The predominant ask was to remove the "aim to permit" principle under section 153 of the Act so that local authorities could limit and refuse applications for new or variation applications for premises licences. The Government has made it clear that they have no intention to remove the "aim to permit" principle as it forms the principle at the core of the 2005 Act itself. The government believe there is sufficient powers to assess and set out the risks for the authority's area and attach conditions to premises licences to manage these risks. Local authorities also have the power to refuse applications if it is deemed that the risk cannot be mitigated.

Local authorities can utilise their Gambling Policy to set out their approach to licensing within their area. The local authority is best placed to pull together research, data and other evidence on local factors that could give rise to greater risks of harm associated with gambling. This could be academic research, heath reports, police crime data, locations of alcohol, drug or gambling addiction clinics, area deprivation, etc. The Gambling Commission recommend, within their Guidance to Licensing Authorities that local authorities develop their "Local Area Profile" (LAP) as part of their Gambling Policy. The evidence contained within a LAP can inform gambling operators, residents, responsible authorities, and the local authority of the local risks of harm. This can then be considered when determining applications for new or variation of existing gambling premises licences. I understand that many local authorities have felt that their Gambling Policy and associated local evidence has limited significance when weighted against the "aim to permit" principle. This was something that the government identified from the consultation submissions. However, in my view the authorities Gambling Policy is an essential document that can be extremely valuable in assisting in the determination of land-based gambling applications. A lot of work is needed to develop a robust policy and the collection of appropriate data and other forms of evidence can take some time. However, the local authority must produce an evidence base that identifies the at-risk groups or locations within their area that may be harmed from a proposed gambling application in the area if they want to develop a robust policy that can be effectively used for the determination of applications.

I'm really pleased to see that our hard work developing our most recent Gambling Policy and the evidence base for our LAP being recognised by DCMS within this paper. Our policy approach has been set out in a case study on pages 215 and 216 of the paper.

The government continues to support the role that local authorities play as a co-regulator under the 2005 Act. However, they do not agree with the push to remove the "aim to permit principle". They will continue to encourage the use of the local authorities' current powers and promote the development of local evidence-based approaches that can be captured within their Gambling Policy.

The government has stated that there is "merit in bringing the regime for gambling in line with alcohol and will legislate to introduce CIAs (cumulative impact assessments) when Parliamentary time allows. The ability for local authorities being able to develop a CIA for gambling is an interesting concept and no doubt will be welcomed by several authorities. The CIA process funder section 5A of the Licensing Act 2003 requires the local authority to publish a the CIA and in it state that the local authority considers that the number of licences in one or more parts of its area, described in the assessment is such that it is likely that it would be inconsistent with the local authorities duty within the Act (to promote the licensing objectives) to grant any further licences in that part or parts.

If the government indicate that intend to introduce this approach for gambling then there will be an opportunity for local authorities to produce a CIA if they feel that there is a cumulative impact from the number of licensed premises in an area on the licensing objectives. The government state:

"CIAs could allow licensing authorities to put presumptions against new premises in a particulate area, based on evidence related to harm, which may take the form of 'high impact zones being identified within a licensing authority boundary".

The devil will be in the detail on this proposal, but it will be interesting to see how the government will reconcile a cumulative impact approach which is typically restrictive versus the "aim to permit" principle which, as they state is at the core of the 2005 Act. I know this proposal will be welcomed by local authorities, but this is likely to raise concerns for the land-based gambling sector and what this could mean to future premises licence applications.

For the pub sector there isn't good news relating to the outcome of the call for evidence on the proposal to increase the threshold at which local authorities need to individually authorise the number of category C and D gaming machines in alcohol licensed premises. The government believes there isn't justification to increase these thresholds. In reference to their justification, they refer to the issues evidenced by several local authorities on the extremely poor test purchase rates for age verification that was found in 2019 by the Gambling Commission and Local Authorities.

Lastly there's some further good news relating to licence fees. The government propose consulting on increasing the cap on licensing authority premises licence fees. The fee cap has not been amended since it was originally introduced in 2007.

We will now await the next steps in the regulatory process in taking the proposals in this paper to legislative changes, amended guidance, new technical regulations, etc. This could take some time and practically some of these proposals may or may not be realised.

Why winning the jackpot is just part of the Buzz!

By Simon Reynolds, Buzz Bingo

Simon Reynolds is Chief Compliance Officer at Buzz Bingo, a sector-leading operator and member of the strategic body the Gambling Business Group. He explains how the Buzz brand which boasts 82 clubs operating in 72 UK towns and cities is at the forefront of compliance at the same time as embracing the strong community values which are central to the land-based bingo experience.

Buzz Bingo is one of the best-known brand names in the sector and despite the economic downturn and across the board increases in business costs boasts some 82 clubs operating throughout England and Scotland. There's no such thing as a 'typical' Buzz Bingo club with the estate comprising a mix of purpose-built venues typically found in retail parks through to the more traditional town centre halls such as the Buzz club in Tooting, south London which was previously a cinema and is a Grade 1 listed building.

In overall terms Simon's job encompasses all rules and regulatory areas impacting the business including health and safety, player protection, audits and security and it involves engaging with both the UK Gambling Commission and local authorities. Each of the Buzz Bingo clubs will be visited by their local licensing authorities to verify that they are complying with the terms of their alcohol and gambling licences. Whilst visits will also confirm age verification undertakings and policies on consumer welfare and self-exclusion Simon believes there's an opportunity to help local authorities gain a better understanding of the culture and the nature of the bingo experience and with it the depth of the relationship which exists between staff and consumers. "As a company we are more than happy to share insights and experience with local authorities "he confirmed. "I think it's important everyone recognises the unique nature of the relationship that we enjoy with our clientele which goes way beyond what is generally known as KYC or Know Your Customer."

During Covid this welfare-centric outlook and unique relationship came very much into its own serving as a lifeline for many of Buzz Bingo's more socially isolated customers. "During the first national lockdown, we launched an initiative called Buzz Buddies – a scheme that saw our general managers regularly call and keep in contact with customers who needed support" he noted. "Keeping in contact with them was so important – for many, a visit to the bingo represents their main social activity, so not being able to do so resulted in them feeling isolated and getting extremely lonely. "We wanted to help ensure they kept as upbeat as possible, so we contacted some 3,500 members during lockdown #1, and re-ran a smaller programme again during lockdown #2. Our general managers rang members purely to stay in contact and check they were ok. Some of our teams also used social media to keep in touch, arranging live singalongs, quizzes and doing video diaries so that members still felt connected to their community whilst in lockdown isolation."

Buzz Bingo operates a 'Think 25' scheme and uses Serve Legal an external age verification specialist agency to test the efficacy of the policy in action. Each club is visited at least once a year with the success rate benchmarked against the best practice examples of high street retailers. Failures result in the introduction of a bespoke action plan and a subsequent re-test.

The demographics of the bingo market are changing and involve a growing proportion of 25 to 40 years-old customers who visit the increasingly popular event shows which blend music, DJ and a bingo offering in a 'female-friendly' safe space. "We have a high proportion of female employees –in excess of 60% - and many mums and their grown-up daughters come to bingo in order to enjoy hassle free nights out together" noted Simon. "We describe it as 'low stake social gambling' where our customers set out what they want to spend at the start of the evening and budget accordingly. Everyone is playing the same game at the same time which generates a social cohesion unique to bingo.

Whilst the opportunity to win a jackpot and perhaps splash-out on a new car or a big holiday is obviously important our customers see themselves as buying entertainment in a social environment, having a drink and a competitively priced bite to eat surrounded by friends and staff who know and care about them. Gambling is an important part of the experience alongside community and friendship. I think in many ways a bingo club shares important characteristics with a well-run community pub where the staff genuinely care about the well-being and welfare of their customers."

https://gamblingbusinessgroup.co.uk

Bingo Industry Fact Sheet

92% of bingo players attend with friends or family
90% of bingo players play because it's fun
85% of bingo players see bingo as an opportunity to socialise
69% of bingo players go to bingo to be around other people
40% of bingo players would be interested in playing bingo after midnight
43% of bingo players say they have been to a late night bingo entertainment event
16 is average number of times per year a bingo player visits a club (once every three weeks)
11% of players say they can't imagine life without bingo
3 million members of bingo clubs
21 million visits to bingo clubs a year or 400,000 a week

Research provided by Bingo Association

Working better together

By Karen Tyrell, Drinkaware

Karen Tyrell joined Drinkaware as the new CEO in October 2022 and has great ambitions for the charity. With over twenty years of working in treatment services, she first started out by working with people who had drug and alcohol problems, providing them with support in their darkest days. ***In this article Karen sets out her thoughts on the next steps and strategy for Drinkaware.***

After working in this field for so long, I came to the realisation that the system is broken and that real change can't come without pragmatic but principled partnership across the system.

Partnership matters

Working together with all parts of the industry, government and other partners is key to reducing alcohol harm.

Across the UK, we are facing massive challenges. The NHS is straining to operate at safe levels and the cost of living is getting more acute.
Alcohol continues to be the leading cause of preventable death in the UK. Figures from the Office for National Statistics (ONS) released before Christmas show that alcohol-related deaths are at their highest level on record.

At Drinkaware, we want to be ambitious in the months and years ahead.

Nearly everyone knows someone who is drinking at increasing risk or harmful levels. We need to reach many more of them and give them the support they need, offering them simple tools, advice and techniques to help them moderate their drinking.

> **Working with people in recovery has taught me about bravery, care and about human connection. And it built one of my fundamental beliefs and a value I bring to Drinkaware – to be non-judgmental and non-stigmatising.**

Taking the fear and the stigma out of these conversations is a priority for me.

Specifically, this means removing stigma from someone choosing to take alcohol-free beers to his mate's house to watch the football, and feeling OK about not drinking, or stopping after a couple of rounds in the pub. It also means being able to say you are worried about your drinking and being able to speak to someone about it.

Changing the conversation around alcohol

Drinkaware's new strategy moves us towards societal change – and that means changing the conversations around alcohol.

The changes we want to see don't necessarily need to be applied equally across whole populations. We need to be targeted in our response to alcohol harms but broad in our discussions as a culture, and society, about the kind of relationship we all want to have with alcohol.

The industry is an asset to this mission, and we all need to change to make a real and genuine impact.
In the year ahead we have three areas of focus:

1. The alcohol-free market is rapidly expanding thanks to a wide range of new products. We are keen to amplify this work, to improve the public's understanding of these products and help them make the switch. These products are a great example of the industry's innovation and progress and, although currently a small part of the market, it has the opportunity to expand rapidly.

2. We know understanding of the Chief Medical Officers' (CMO) guidelines are low. It is a simple place to start, and together I want us to improve that.

3. Drinkaware's digital screening tools are the most widely used in the UK outside of the NHS. Over the course of our new strategy, we want to build on these, develop them further and get many more people using them.

Tackling alcohol harm means working in partnership with governments, industry, and wider society.
This doesn't mean we forgo our independence. Our advice, information and recommendations will always be built on our own, independent analysis of the facts.

"I want to make it normal to talk about drinking, normal to check your drinking from time to time and make changes. And normal to ask for and find help if you need it. Everyone should be able to live their life and have a healthy relationship with alcohol. I think it is important to recognise that what that means for one person might look and feel different to someone else."

We need to confidently communicate to partners in government, industry and elsewhere what the evidence is telling us. We need to be confident too if the evidence isn't clear cut, but the balance of probabilities points in one direction or another.

We are going to be disciplined and focus on the 8 million adults who are drinking at increased risk. With our new strategy, I'm confident we can rise to the challenge and demonstrate real action on alcohol harm.
In the months and years ahead, we're going to ensure Drinkaware is at its most effective by:

- Understanding the alcohol industry and working in partnership
- Understanding government and working in partnership with them too;
- Providing consumers and those affected by alcohol harm with the information and facts they need.

This is what Drinkaware was set up to do. And this is what I'm determined that Drinkaware will do.
Change is needed. And we can make that change more effective together.
You can read Drinkaware's full new strategy on the Drinkaware website.

'We've Got HeART'

by Daniel Davies, CEO of Rockpoint Leisure and IoL Chairman

Most of you will know by now how passionately I feel about my local hometown, and the financial and emotional investment I have made over the last few years into the regeneration and reimagination of New Brighton, and in particular the Victoria Quarter.

In previous articles published in LINK I have talked about my efforts in engaging young people locally and getting them involved in painting and rejuvenating street furniture and the like. The purpose and the result being to get them invested in the local area and diverted from boredom potentially leading to anti-social behaviour or worse. To make them feel appreciated and part of the solution, rather than as is often the case, a problem to be addressed.

I jumped at the chance to get involved in 'We've got HeART'. This is a ground-breaking art initiative led by Wirral Local Community Policing team under Project Adder[1] as part of a national effort to steer individuals away from drug use and towards support services.

'We've got HeART' is an art exhibition whereby the art is produced by hostel residents who have experience of substance addiction. It was the result of a proposal by Constable Diane Park who visited local hostels with her colleague Constable Emily Scarratt.

These visits have been ongoing since 2019 through the local policing team at Bebington Police Station, who have been working closely with hostel residents and staff to address high crime and high harm issues within the facilities. When Wirral was later identified as a Project Adder area, efforts within the Hostel facilities intensified with the aim of reducing harm

[1] Project Adder is a government funded programme focusing on co-ordinated law enforcement activity, alongside expanded diversionary programmes (such as Out of Court Disposal orders), using the criminal justice system to divert people away from offending. https://www.gov.uk/government/publications/project-adder/about-project-adder

and vulnerability by addressing substance addiction through increased engagement with service users, in order to refer them to relevant support services for treatment. Substance addiction is a major driver of the high crime and vulnerability within the hostels, so successfully addressing and treating the addiction will in turn have a significant and positive impact on crime and vulnerability.

During these visits, Constable Diane Park noticed that residents were engaging in art workshops – even the more problematic "un-manageable" residents. In brainstorming some ideas around this with Insp Alan McKeon, 'We've got HeART' was born.

Having worked with Merseyside police on licensing, environment, crime and ASB issues, we were delighted to support the project and host a three-week public exhibition of the artists' work at our Oakland Gallery in New Brighton. There was a huge amount of media interest in the project both locally and nationally, including a Crimewatch feature which came about due to the level of public and professional interest in how this project was working to address addiction and vulnerability and how this was driving the Merseyside Prevention Strategy as a great piece of partnership work within the community.

In summary, this has been a fantastic project and one which we have been proud to support. It makes a difference to the community as a whole as well as the individuals who are getting investment and support as well as being encouraged to celebrate their artistic talents.

Substance addiction drives crime in the community and fundamentally is devastating to individuals, their families and friends and this project helps people to find other interests and to access support.

"I also noticed my concentration was more on the Art project, rather than the worries of others or having a drink."

"Being involved in this project has meant that while I am working on my art, I am not thinking about drugs for an hour whereas I couldn't think of anything else before hand."

"I have been clean since taking part in this project. This has shown me that I can be good at something and I have something to offer – thank you so much."

"The artwork has given me something to look forward to. This has given me something else to concentrate on other than worries in my head."

"We lost our Son to drugs and I think it is so important for the Police to be involved in initiatives like this rather than just dealing with the fall out. Thank you"

"Through this important project, Merseyside Police is helping people turn away from drug use and harnessing their talents to create and showcase art. Across the country, Project ADDER is supporting areas afflicted by drugs- blending strong enforcement action against dealers with improved treatment to help people faced with addiction find support."

Policing Minister – Chris Philp MP

Buckle Guards – An illegal requirement

By James Button and Sue Nelson

Through our work with the newly established National Taxi and Private Hire Licensing Working Group (the Taxi Group) , and other discussion forums including our long established Taxi Consultation Panel, we have the opportunity to discuss arising issues affecting industry and regulators alike. A frequent agenda for the Taxi Group at the moment concerns driver shortages, barriers to licensing and emerging crisis relating to SEND transport.

We don't use the term 'crisis' lightly. We are consistently hearing that driver shortages continue to plague the industry, and that children with special educational needs in many areas lack reliable and consistent home to school transport, leaving local education authorities unable to fulfil their obligations to the most vulnerable children in our society.

There are things that can make a difference, and in the last edition of LINK, we included a detailed article co-authored by Yvonne Lewis, Phil Bates and James Button, which looked at the use of restricted licences in Swansea and Eastleigh, and how that has served well in removing some of the requirements for full hackney carriage / private hire driver licences (for example some training requirements) with no impact on safety and suitability assessments of individuals. This is one means of easing the pressure for SEND drivers.

More recently, a conflict of interests between education authorities and the law has become apparent, with a number of local education authorities mandating school transport providers to use buckle guards for some children whilst being transported under home to school transport contracts with their authority.

Buckle guards, also referred to as seat belt clips, are attachments which are fitted to the buckle or "catch" part of a seatbelt, aimed at preventing the easy release of the seatbelt. Some children with special educational needs have a tendency to play with their seatbelts, which can result in the seatbelt unfastening. If this occurs, the driver has to stop the vehicle until the seatbelt is re-fastened, either by the driver or a chaperone if one is present.

So, what's the issue? Buckle guards contravene regulation 48 of the Road vehicles (Construction and Use) Regulations 1986 which states:

Maintenance of seat belts and anchorage points

(1) This regulation applies to every seat belt with which a motor vehicle is required to be provided in accordance with regulation 47 and to the anchorages, fastenings, adjusting device and retracting mechanism (if any) of every such seat belt.

(2) For the purposes of this regulation the anchorages and anchorage points of a seat belt shall, in the case of a seat which incorporates integral seat belt anchorages, include the system by which the seat assembly itself is secured to

the vehicle structure.
(3) The anchorage points provided for seat belts shall be used only as anchorages for the seat belts for which they are intended to be used or capable of being used.

(4) Save as provided in paragraph (5) below—

(a) all load-bearing members of the vehicle structure or panelling within 30 cms of each anchorage point shall be maintained in a sound condition and free from serious corrosion, distortion or fracture;

(b) the adjusting device and (if fitted) the retracting mechanism of the seat belt shall be so maintained that the belt may be readily adjusted to the body of the wearer, either automatically or manually, according to the design of the device and (if fitted) the retracting mechanism;

(c) the seat belt and its anchorages, fastenings and adjusting device shall be maintained free from any obvious defect which would be likely to affect adversely the performance by the seat belt of the function of restraining the body of the wearer in the event of an accident to the vehicle;

(d) the buckle or other fastening of the seat belt shall—

(i) be so maintained that the belt can be readily fastened or unfastened;

(ii) be kept free from any temporary or permanent obstruction; and

(iii) except in the case of a disabled person's seat belt, be readily accessible to a person sitting in the seat for which the seat belt is provided;

(e) the webbing or other material which forms the seat belt shall be maintained free from cuts or other visible faults (as, for example, extensive fraying) which would be likely to affect adversely the performance of the belt when under stress;

(f) the ends of every seat belt, other than a disabled person's seat belt, shall be securely fastened to the anchorage points provided for them; and

(g) the ends of every disabled person's seat belt shall, when the seat belt is being used for the purpose for which it was designed and constructed, be securely fastened either to some part of the structure of the vehicle or to the seat which is being occupied by the person wearing the belt so that the body of the person wearing the belt would be restrained in the event of an accident to the vehicle.

(5) No requirement specified in paragraph (4) above applies if the vehicle is being used—
(a) on a journey after the start of which the requirement ceased to be complied with; or

(b) after the requirement ceased to be complied with and steps have been taken for such compliance to be restored with all reasonable expedition
.

(6) Expressions which are used in this regulation and are defined in regulation 47 have the same meaning in this regulation as they have in regulation 47.

The relevant element of this is of course regulation 48(4)(d)(ii) which prohibits the use of any temporary or permanent obstruction to the buckle of the seatbelt. Accordingly, the use of buckle guards is therefore illegal, and contravention of the regulations is a criminal offence by virtue of section 40 (5) of the Road Traffic Act 1972.

This matter was the subject of a notification made by a DVSA email on 9 February 2023 which was circulated to education authorities by the Home to School Transport Team at the Department for Education. The Department for education email stated:

"The Department has been engaged in constructive dialogue with both DfT and the DVSA. There is consensus from all parties about the need to balance passenger safety alongside the importance of attending school, particularly for those children with SEND travelling to and from school. This statement from the DVSA reflects that. We also recognise the need to do further work in this space, working closely with stakeholders.

Seatbelt Buckle Guards

On 9 February DVSA issued an email alert to public service vehicle (PSV) operators to advise them not to use seatbelt buckle guards.

Risk

DVSA's priority is the safety of PSV passengers.

There is a risk the use of these guards could prevent the release of a seatbelt quickly in an emergency.

The alert was intended to support operators to ensure the safety of their passengers.

Current practice

At this stage, DVSA is highlighting the potential safety issues with the use of seatbelt buckle guards. If DVSA examiners find evidence of the use of seatbelt buckle guards during routine roadside inspections, their first action would be to offer advice and guidance about vehicle and passenger safety.

Moving forward

DVSA wants to work with industry to develop a solution to support the safe transport of PSV users: it has no plans to target enforcement action against their use. DVSA will continue to work with stakeholders, including the Department for Education, Department for Transport, schools, local authorities and parents so everyone affected can be confident about using transport services safely"

Clearly the use of such buckle guards is unlawful, and although DVSA state that at present they are not seeking to enforce against their use, this does not overcome the problem for providers of home to school transport, who face the consequences in the case of an accident or other incident where injury or worse is caused or exacerbated by the use of these devices.

In the event of an accident, the buckle guard may prevent release of the seatbelt, which may then lead to injury or worse to the child whose seatbelt has been fitted with such a device. That device would have been fitted by the vehicle owner and licensed private hire vehicle proprietor. The consequence of such events could be that contractors face at best, public criticism of their practice, and at worst potential prosecution for corporate manslaughter. The same risks (excluding corporate manslaughter) would apply to the driver of any vehicle which is equipped with buckle guards.

It is simply unacceptable for a local authority to insist on the use of illegal devices as part of the conditions for a home to school transport contract. No contract can require illegal activity, and absence of enforcement does not legitimise the activity – it remains unlawful. Putting it simply, the use of a buckle guard is the same as driving with a bald tyre.

Furthermore, insisting on the use of these devices places the local education authority at the same risks as the vehicle owners - corporate manslaughter in the worst case scenario.

We understand that the Department for Education has committed to working with the DfT to 'find a lawful solution', and we will wait to hear more on this in due course. In the meantime, there are clear alternatives to buckle guards. In the first instance, every child is different, and the individual risks presented by each child require careful evaluation, in consultation with their parents/guardians.

Depending on the outcome of those discussions, further training for drivers and carers, together with diversionary tactics, possibly allied to extended travel time, may suffice. Failing all that, the use of a Crelling Harness (a specially designed harness with a safety buckle) allied to a belt cutter in clear view is a last resort. All of the above are lawful, and readily achievable.

In the meantime, it is important that local licensing authorities are aware of the potential issues with licensed vehicles that are also used for home to school transport and consider engaging with local education authorities to ascertain the position locally with a view to ensuring that licensed vehicles in their areas are not fitted with illegal buckle guards.

Share your trip → Driver profile → 24/7 customer support → Driving hour limits → Speed limit alerts → Phone number anonymization → Safety toolkit → DBS background check → PIN verification → Real time driver ID check → Driver face covering verification → Door to door safety standard → Covid-19 checklist →
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Events - What's On / Online?

We are delighted to offer the following training courses which can be booked online or via email to events@instituteoflicensing.org
https://www.instituteoflicensing.org/events

Professional Licensing Practitioners Qualification

22nd, 27th, 29th June, 5th July 2023

The training will focus on the practical issues that a licensing practitioner will need to be aware of when dealing with the licensing areas covered during the course. The training is ideally suited to someone new to licensing, or an experienced licensing practitioner who would like to increase or refresh their knowledge and expertise in any of the subject matters. The training would be suitable for Council and Police Licensing Officers, Councillors, Lawyers who advise licensing committees, managers of a licensing function and committee services officers.

Preparing for Court

18th July 2023

This new, half day, online training will help local authority officers prepare for giving evidence in the Magistrates' Court. It is suitable for anyone with an appeal hearing or anyone preparing to give evidence on a prosecution case. The trainer is Luke Elford, John Gaunt & Partners. Please visit the website to view the full agenda.

Councillor Training

6th, 20th June 2023
(LA2003 only - perfect for committees who do not deal with Taxis)

Aimed at all councillors who are involved in the decision making process of licensing applications. The course will cover the general principles of licensing, including hearings under the Licensing Act 2003 and committee decisions relating to the hackney carriage and private hire regime.

Contact the IoL team

Email: events@instituteoflicensing.org
or telephone us on 01749 987 333

Face to Face

Summer Training Conference

Hilton Hotel, Cardiff

14th June 2023

The Institute's Summer Training Conference will be hosted by the Wales Region and takes place at the Hilton Hotel, Cardiff on Wednesday 14th June 2023 as part of National Licensing Week. The aim of the day is to provide a valuable learning and discussion opportunity for everyone involved within the licensing field, and to increase understanding and promote discussion in relation to the subject areas and the impact of forthcoming changes and recent case law.

We have a fantastic programme of speakers and will be looking at Martyn's Law (the Protect Duty), hackney carriage and private hire licensing, beauty and aesthetics, the Gambling White Paper and more besides. We look forward to welcoming you alongside our expert speakers from Welsh and UK Governments, legal experts, local authority licensing, industry and police.

For more information visit
https://www.instituteoflicensing.org/Eventitem/GetEventitem/173219

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Cross Border Hiring

By Jill Morgan

Introduction

'Cross border hiring' can refer to two different scenarios, under the current legislation. The first is where taxis licensed in one district can operate lawfully for private hire vehicle (PHV) purposes in another. The second scenario is where PHVs from one area can pick up passengers from another, so long as the driver, vehicle and operator are licensed by the first district, or alternatively that the operator sub-contracts the booking to an operator licensed in the other district.

Arguments against cross-border hiring

Cross-border hiring brings with it a number of challenges for local authorities, primarily because there is disparity in the standards required of both vehicles and drivers, depending upon which authority licenses them. This is because each licensing authority sets its own policies and conditions. For example, some authorities require drivers to complete intensive training, whilst others do not. Some authorities allow older vehicles which may be less environmentally friendly, whereas others do not. Only the authority that licenses the driver, vehicle or operator can enforce against them. The authority in which they are operating, has no powers to intervene if the driver contravenes any conditions of the licence, and its only option is to contact the authority that issued the licence. In some cases this is impossible, because they don't have the relevant information. Some common complaints received by licensing authorities are overcharging, cancelled bookings, safeguarding issues, drivers refusing to take passengers or speaking to them inappropriately, or refusing to take disabled passengers. Cross-border hiring also introduces unfair competition, which is particularly detrimental to those who are licensed to higher standards. In addition, there is inconsistency in safety and quality standards.

Arguments for cross-border hiring

There are however, arguments for cross-border hiring. Some say that it increases consumer choice, and that it allows drivers to work freely in other authorities. Transport Minister Richard

Holden said "The government is aware of the challenges out-of-area working can present to licensing authorities, but also sees the value this system provides in meting otherwise unmet demand in areas where drivers might not be immediately available". He reiterated that the Department for Transport's 'Statutory Taxi and Private Hire Vehicle Standards' recommends enhanced Disclosure and Barring Service (DBS) checks for taxi and private hire vehicle drivers and that all licensing authorities require those checks.

Whilst the issue of cross-bordering has been ongoing for years, the cost of living crisis may push applicants to apply for licences in districts where the licence fee is cheaper and/or there are less training requirements (and therefore less cost to the applicant). Progress has been made, and many councils are making changes to their conditions, but there have been no legislative changes to amend councils' powers to act. However, in the last few years, there have been developments, particularly in Wales and Greater Manchester which attempt to mitigate and/or eradicate some of the issues that councils face.

Wales

The Welsh Government has announced plans to introduce 'national minimum standards' for taxis and PHVs. The Welsh Government's 'Taxi and Private Hire Vehicle (Wales) Bill' white paper, is under consultation until June 2023. The aim is to deliver on a Programme for Government commitment to modernise the sector and to make services safer, greener and fairer. Service inconsistency was a recurring issue during engagement with the industry and other stakeholders. The white paper says that introducing new standards would help to 'level the playing field' for taxi drivers and PHV drivers.

The main concerns "which have been identified in a number of reviews and consultations in this field are:

- the inconsistency across Wales in terms of licensing standards;
- the lack of enforcement powers to deal with drivers operating out of area; and
- the lack of clarity around the distinction between taxis and PHVs and what they are allowed to do."

Consequently, the "key proposals for reforming the legislative framework are:

- The introduction of mandatory national minimum standards for drivers, vehicles and operators applied across Wales;
- Improved enforcement powers for local authorities. This will include provision for local authorities to take enforcement action against any driver or vehicle wherever they are licensed; and,
- Better information sharing between local authorities and better information for passengers."

The white paper effectively proposes giving more powers to local authorities to enable them to enforce against vehicles and drivers operating outside of the area in which they were licensed and plans to introduce mandatory minimum standards. This will allow local authorities to suspend, revoke and/or refuse to renew a licence if the licence holder fails to meet the standards. The white paper also proposes better information sharing between local authorities and better information for passengers. The aim of the new legislation is to promote 'safety, customer service and enforcement'.

Manchester

The ten local authorities comprising Greater Manchester, intend to introduce joint minimum standards for all taxis and PHVs within the region. The intention is to change the Minimum Licensing Standards following engagement with the taxi and private hire trade. A final set of policy standards was endorsed by the Greater Manchester Combined Authority on 29 October 2021, but some local authorities had to delay their approval because the Greater Manchester Clean Air Plan and Clean Taxi Fund grants were paused in February 2022.

In July 2022, a report from Greater Manchester's Air Quality Administration Committee was delivered to the Secretary of State which said that out of area taxis allowed evasion of "fair, safe and democratically determined local licensing standards, which undermines public safety as well as local measures to progressively improve up driver and vehicle standards". The Greater Manchester Clean Air Plan is a programme which receives government funding to help improve air quality. The report which explains the plan, states that "one key barrier preventing Greater Manchester local authorities from being able to effectively oversee the progressive improvement of private hire vehicle (and therefore emission) standards, is the ongoing ability of vehicle owners/drivers to be licensed 'out of area'".

Comment

Cross-border hiring has long been an issue for local authorities across the UK, bringing with it a number of challenges. Whilst there are arguments in favour of cross-border hiring, it is clear that there are a number of factors which support regulation in this area, not least the fact that there is significant disparity across the different licensing authorities. Public safety is paramount and the impact upon the environment due to differing vehicle standards is also essential to consider when dealing with the issue of cross-border hiring.

Animal Welfare – Warrants

By Stewart Broome Senior Licensing Officer, East Cambridgeshire District Council and Chairman of the IoL Eastern Region

I am a licensing officer in charge of a small licensing authority to the north of the city of Cambridge. We are a small authority with one main city, and a number of small market towns. We also have a lot of sparsely populated rural farm land, which makes us an ideal location to set up activities falling within the Animal Welfare (Licensing of Activities Involving Animals)(England) 2018 Regulations (LAiA). Prior to 2018 we had approximately 28 animal welfare licences active at any given time; by December 2022 we had 68 active animal welfare licences, with the largest increase in numbers coming from the dog breeding sector.

The increase in overall numbers was certainly driven by improved publicity around the LAiA 2018 regulations, but I believe the increase in dog-breeding in our area was down to the hard work of my enforcement officer who scanned all the various online advertising platforms and informed those advertising of the changes to the rules surrounding dog-breeding, namely, the lowering of the number of permitted litters, and the clarification of the rules around commercial dog-breeding. With the perseverance of a dog with the proverbial bone she got the advertisers to either apply for licensing or to cease unlicensed (illegal) activity.

As is the case in most walks of life, despite our bests efforts there will always be those who wish to exploit a perceived loophole, or those who just plainly believe they are above the law. In such cases, it is essential that all licensing authorities deal with them swiftly. After all, without enforcement against such individuals, existing licence holders will be at a commercial disadvantage and new operators are less likely to want to do the right thing if Joe Bloggs down the road is not licensed. In the meantime, animals could be suffering at the hands of unscrupulous individuals.

The Animal Welfare Act 2006 has been in force for just over 16 years, and the LAiA Regulations have been in force for just over four years, yet there appear to be a relatively low number of prosecutions for illegal licensable activity, breaches of licence or general animal welfare-related offences being instigated by licensing authorities.

I have had conversations with officers on why this may be, and amongst the usual issues of staff and financial resourcing being raised, the main feedback I received was that despite there being excellent training available on the LAiA 2018 Regulations, not least the excellent BTEC Level 3 Animal Inspectors course offered by the Institute of Licensing, there is a lack of specific knowledge on how to tackle animal welfare enforcement issues – whether this is enforcing against a licensed operator who is failing to comply with their licence, or an unlicensed operator refusing to cease their unlawful activity. In particular, the main barrier appeared to be the issue of warrants.

The following is a heavily sanitised account of an animal welfare case I am currently dealing with, that required a warrant. My hope is that you will find it useful...I certainly know it would have helped me!

I was aware that we had had dealings with this individual previously, and we had been given the usual excuses and promises, "it was an accidental pregnancy", "I'm not

selling any", "I wasn't aware of the need to be licensed, but promise I won't do it again". We had also been refused entry to their premises on one previous occasion. Things came to a head in July 2022, when a complaint prompted officers to thoroughly check all known online advertising platforms for proof this individual was potentially breeding dogs again. It did not take long to find substantial evidence suggesting this to be the case.

Armed with this information, a meeting was held with our legal department, and head of service to discuss the need to obtain a warrant to gain entry to the premises, as it was obvious to us that any prior warning would see the dogs removed from the site, or entry to the site refused. Senior management were involved because this case had significant potential cost and officer resource implications. Isolation facilities run at about £40 per dog, per night in some facilities, and so you can see how costs can accrue very quickly!

In theory, applying for a warrant is easy: s 23 of the 2006 Act provides the power, and you just need to satisfy the magistrate there are reasonable grounds for believing that either a relevant offence (a breach of condition is a relevant offence), or evidence of the commission of a relevant offence is to be found on the premises, and that one of the four conditions in s 52 of the Act are satisfied. In 99% of cases, it is likely to be the fourth condition you'll be relying on:

"The fourth condition is that it is inappropriate to inform the occupier of the decision to apply for a warrant because—
(a)it would defeat the object of entering the premises, or
(b)entry is required as a matter of urgency"

Schedule 2 of the 2006 Act sets outs the nuts and bolts of what must be included, and what can be asked for, and the limitations or framework of the warrant procedure, such as warrants must be executed within three months, and warrants can only be executed on one occasion. The paperwork required is a warrant application form, and two copies of the warrant template itself – one for the council and one for the occupier of the premises. When completing the application form ensure you cover all officers attending including persons assisting, such as an appointed vet, a dog warden, police officers etc. Also, ensure you also include all items that you wish to look for including electronic devices, as most evidence will be found on laptops and mobile phones these days, and finally make sure that the premises address is correct on the warrant! Once pre-completed, the forms are sent to the court listings officer. The court will then notify you of your appearance date and time. In our case, we were heard in chambers, and the matter was resolved in under 30 minutes.

Armed with your signed warrant, you will need to plan the day very carefully: in these situations, never has the saying "fail to prepare, prepare to fail" been more apt.

In addition to those you have stipulated on the warrant, you have a duty to leave the premises secure, so having a locksmith on hand is essential, just in case forced entry is required. There may well be a need to remove a large number of animals owing to welfare concerns, and unfortunately immediate veterinary assistance might also be necessary so having suitable isolation facilities and a veterinary practice on standby is also essential. As for equipment, there are the obvious things like evidence bags and tags, a mobile phone, a camera, a pad / tablet and pen / pencil, but there are other less obvious things such as sample-taking kits, a first aid kit, shoe covers, gloves, a microchip reader, overalls and leads and muzzles.
From the information we had, we expected to find 16 dogs in the unsuspecting semi-detached house we were

Institute of Licensing

BTEC Level 3 Certificate for Animal Inspectors (SRF)

COURSE DATES:

GROUP 14 (173159): 25th May, 6th, 19th & 26th June, 6th & 10th July

The IoL's BTEC Level 3 Certificate for Animal Inspectors (SRF) is accredited by Pearsons, an OfQual Awarding Body.

The course will provide learners will all the knowledge and skills they require to be able to competently carry out their duties under The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018.

The course includes 5-days of training delivery, and learners are required to complete written submissions and practical inspection assignments which are evidenced within their learner portfolio. Learners have 12 months to complete the course following enrollment, and additional tutorials sessions are available if needed.

Course Modules

Course content includes:

- Legislative overview
- Dog breeding
- Premises that hire out horses
- Home Boarding
- Kennel Boarding
- Day care (dogs)
- Premises that sell animals as pets
- Premises keeping or training animals for exhibition and dangerous wild animals

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inspecting. On the day, however, we found 44, with two bitches due to whelp any day. We body scored the dogs and puppies, and in the opinion of our appointed vet, it would have been justifiable to remove all of the dogs present, but this was simply not an option for a multitude of reasons. The decision was made to remove those in the worst condition, along with all of the mums, mums to be, and puppies under eight weeks of age. A really obvious but important thing to remember is that when assessing the dogs, take photos of them, and take notes on their condition while systematically working through the dogs present. Take photos of the house: things such as, faeces / urine on the floor, general accommodation areas, available feeding and watering facilities. This evidence will pay dividends when it comes to proving s 4 and s 9 offences.

In total we removed 29 dogs to two different isolation facilities, and we achieved this with the owner's consent. Within two weeks a further ten puppies were born into our care facilities.

The occupier's consent was important because while it is possible to remove dogs that are suffering using s 18 of the 2006 Act, it is then necessary to seek a court order to permit the re-homing of the animals you have taken into your possession. If this is not granted or applied for, the animals remain in your possession until the main court prosecution occurs, or the animal's owner successfully obtains a court order to have the animal's possession transferred to a specified person. In our case with 39 dogs in our care (29 plus the additional 10 puppies borne by the two pregnant bitches we removed), reliance on s 18 might have resulted in a care bill in excess of £100,000 while we waited for the court's decision (currently, court backlogs are seeing cases waiting in excess of 12 months to be listed).

We have incurred costs of £20,000, and expect our total costs to be in the region of £30,000 by the time we reach a court verdict, and whilst the 2006 Act makes it possible to seek reimbursement for these costs, it is unlikely in most cases that we will ever see any significant sum recovered. However, I feel the worst part about the way s18 works is that there is the possibility that a large number of animals could be tied up in the system way beyond their cute and fluffy stage of life!

So, having searched the house thoroughly; removing 29 dogs, and obtaining over 150 pieces of evidence in the process, my team and I concluded all of the paperwork (you must ensure you leave the occupier with a copy of the warrant, a copy of the evidence log and a copy of their notice of rights to comply with the PACE rules), and left the property with an agreement to go back the following week to rehome any of the remaining animals the occupier hadn't managed to rehome, and follow up on the locations of any dogs rehomed by the occupier to ensure their welfare was protected.

After concluding the investigation, we have charged the individual with offences under sections 4, 9 and 13 of the 2006 Act, and are keeping our fingers crossed that the court believes we've proved the case beyond reasonable doubt!

But whether or not we secure the convictions we want, 54 dogs now have a better life as a result of our work, and that's got to be well worth the effort in itself.

RSPCA PawPrints award scheme - celebrating and rewarding best animal welfare practices

By Lee Gingell, RSPCA

There's no denying that we're a nation of animal lovers. Indeed, polling conducted by YouGov on behalf of the RSPCA found that over two in three (69%) UK adults are willing and able to help animals - and we expect governments, at all levels, to help animals as well.

As a nation, we can be proud of our achievements for animal welfare. Last year, we celebrated 200 years since the first piece of animal welfare legislation and next year, the RSPCA is celebrating our 200th birthday. While we can be proud of our achievements, sadly, animal cruelty and neglect still exist. Last year, the RSPCA received almost 1.1 million calls to our cruelty line - over 100 calls every single hour. We successfully prosecuted 400 individuals for animal welfare offences. Evidently, we have a long way to go until all animals are respected and treated with kindness and compassion.

Local authorities are at the forefront of delivering animal welfare legislation in the UK. From the provision of a stray dog service to enforcement of licensing activities involving animals, they are crucial partners for the RSPCA - standing with our inspectors on the frontline of protecting and promoting animal welfare. We value the partnership between the RSPCA and local authorities. We know we can't deliver for animals alone; we need to work together for animal welfare.

For fifteen years we've been proud to run our PawPrints awards scheme. Formerly the Community Animal Welfare Footprint (CAWF), the PawPrints awards recognises and celebrates local authorities for delivering animal welfare services that go above and beyond basic and statutory minimum service levels. There are five categories: licensing activities involving animal welfare, stray dog services, contingency and emergency planning, housing and kennelling, and each category has three levels (gold, silver and bronze). Each level carries progressively challenging criteria. We also offer the prestigious "Innovator in Animal Welfare" and "Special Recognition" awards.

Since 2008, we've been honoured to hand out nearly 1,500 awards to inspirational local authorities for their commitment to protecting and promoting animal welfare. PawPrints has collected and shined a light on lots of examples and case studies of truly innovative and unique processes, policies and procedures that have significantly improved animal welfare.

Animal Licensing Wales was awarded the Innovator in Animal Welfare award last year for their innovative delivery of licensing services in Wales. The team implemented a model of shared services, ensuring enforcement is consistent and all local authorities have access to knowledgeable and skilled staff to deliver for their communities - including animals. It's one small example of how PawPrints has identified, recognised, and celebrated best practices. In doing so, we hope to inspire local authorities and staffers to consider how they can improve their animal welfare services.

The PawPrints award scheme opens for entries on 26th April 2023. Awarding will take place on 18th August 2023. We're incredibly grateful to the Chartered Trading Standards Institute, the All-Party Parliamentary Group on Animal Welfare, the Local Government Animal Welfare Group, the Chartered Institute of Environmental Health and the Institute of Licensing for supporting the awards. You can find more information,

including how to enter, online at https://politicalanimal.rspca.org.uk/england/pawprints.

While we've been incredibly grateful to recognise and celebrate local authorities as part of our PawPrints award scheme, it would be disingenuous to accept that enforcement of animal welfare legislation is working, at least under the traditional model. Since 2010, local authorities have suffered significant budget cutbacks, and many are struggling to deliver statutory services, let alone have the capability to go above and beyond statutory minimums.

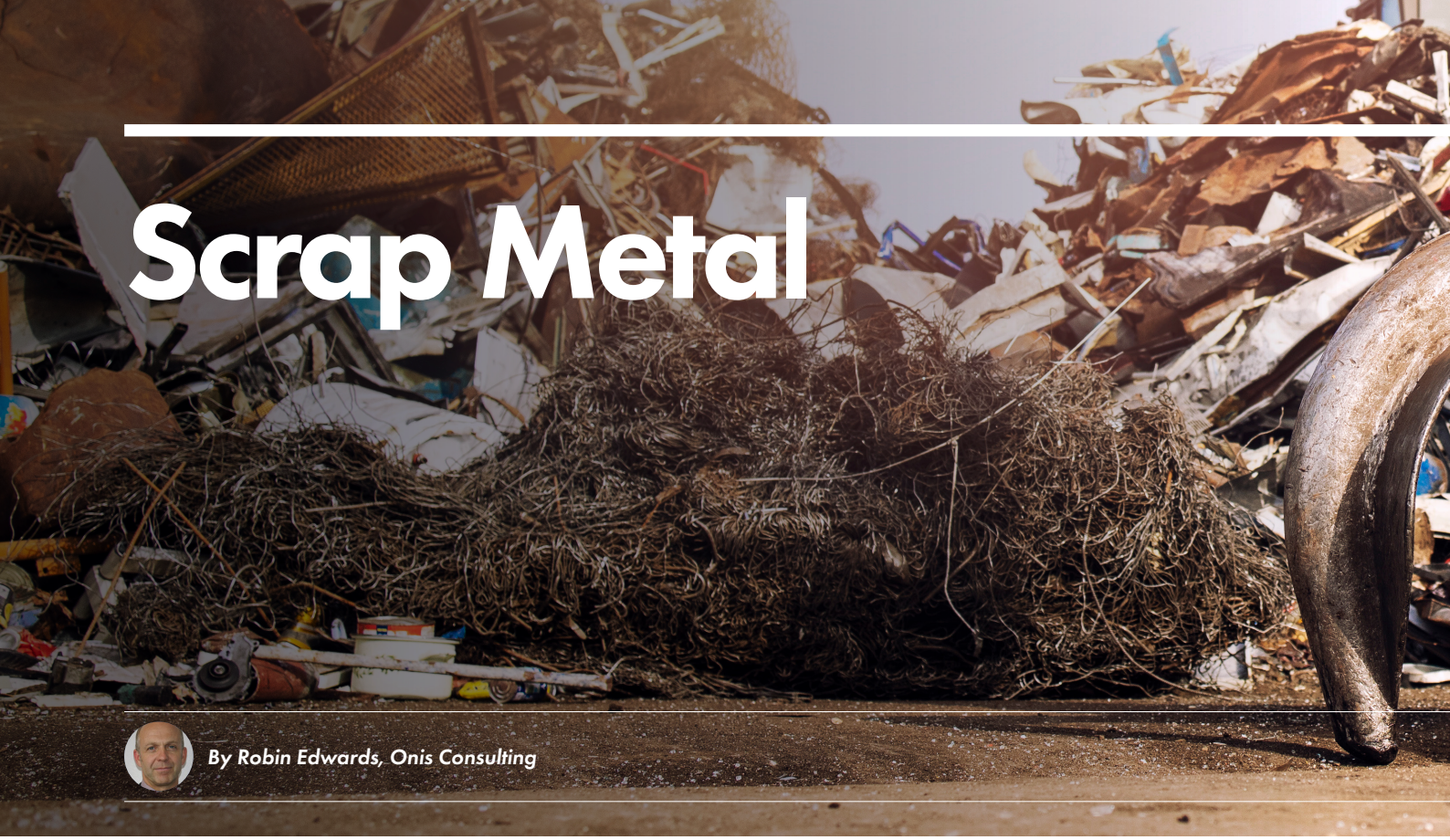
We are seeing more and more animal welfare legislation, but if it is to improve animal welfare, it's crucial local authorities can effectively enforce it. Not only that, but existing legislation also needs to be strengthened. For example, the Licensing of Activities Involving Animals (Regulations) (England) 2018, and equivalent legislation in Wales, doesn't establish a licensing regime for animal sanctuaries, leaving thousands of animals at risk of poor welfare. Local authorities and enforcement officers are struggling with their in-tray as it is, let alone adding more to their plate.

Working in collaboration with the All-Party Parliamentary Group on Animal Welfare (APGAW) and World Horse Welfare (WHW), the RSPCA contributed to APGAW's "Improving the Effectiveness of Animal Welfare Enforcement" report.

The report explores the current picture of animal welfare enforcement and identifies some of the challenges and issues acting as barriers to effective enforcement. The report highlights the inconsistencies in animal welfare enforcement, the lack of knowledge and confidence among some enforcement officers, and the lack of resources and capacity. All are standing in the way of effective enforcement of legislation and, by extension, improving animal welfare.
The report proposes a new model of enforcement. Moving licensing responsibilities away from the lower-tier district and borough councils and placing them instead with upper-tier authorities. Alongside this, the report proposes amending the Animal Welfare Act 2006 to include a statutory responsibility for local authorities to have "access" to a dedicated animal welfare officer, either directly via their own council or indirectly via a shared services model.

This would be supported by establishing regional and national animal welfare panels consisting of representatives from the local authorities, partner agencies, and non-governmental organisations, such as the RSPCA. The panels would horizon scan, identify trends, agree upon consistent policy and guidance, and support local authorities and enforcement officers by sharing knowledge, expertise, data and intelligence.

We are working closely with APGAW, WHW and others to move the recommendations outlined in the report forward, but, In the meantime, we're anxious to recognise and celebrate more local authorities and staff that, despite huge and daunting challenges, are committed to going above and beyond for animals and their welfare. We do hope you consider entering the PawPrints award scheme - the only one of its kind in England and Wales - and be in with a chance to be recognised for your outstanding work in difficult circumstances. Thank you for all that you do for animals.



Scrap Metal

By Robin Edwards, Onis Consulting

Robin Edwards is acknowledged as an expert in his field having gained a wealth of experience in relation the to the Scrap Metal Dealers Act 2103 and metal crime. Robin was the National Project Lead for Operation Tornado, Operational Lead for the National Metal Theft Taskforce and was involved in the development and delivery of the 2013 Scrap Metal Dealers Act before retiring and setting up Onis Consulting which works with enforcement and industry to tackle metal crime. Robin currently works for British Transport Police (BTP) and National Police Chiefs Council (NPCC) Lead as a subject matter expert. He was one of the founders of the National Infrastructure Crime Reduction Partnership which he supports as a subject matter expert and trainer. He acts as an expert advisor to enforcement agencies in the UK and sits on numerous working groups. His knowledge and expertise around metal theft is recognised internationally.

I can't talk about metal crime without discussing the importance of training and how much impact this has on both enforcement agencies which includes Licensing, police, and environmental services and those who are victims of crime. There are additional challenges around enforcement in terms of where responsibility sits when it comes to enforcing the legislation, which even after almost ten years still causes confusion and in many cases a lack of any meaningful response.

The new Scrap Metal Dealers Act was introduced in 2013 and the impact it had on metal crime and how it forced sections of the recycling sector to improve their processes and standardised business across the sector should not be underestimated. I spent a great deal of my time in 2013 delivering training to police forces and local authorities on the new legislation to make sure enforcement was fully up to speed when the act was introduced. At that time, I believe we were effectively enforcing the new legislation, and this was reflected in the number of crimes that were reduced nationally, which was significant. Both police and Licensing were very much at the forefront of this enforcement and with the support of the National Metal Theft Taskforce (NMTT) and partners we really made a difference. Unfortunately, the NMTT which was led by British Transport Police was disbanded in early 2014 and this didn't allow sufficient time to train up all enforcement agencies and absorb metal crime activity into normal operational activity.

However, it was clear that there were a number of challenges that the act brought which included responsibilities for actually enforcing the legislation. For example, the Local authorities were responsible for issuing the licences, providing this data to the Environment Agency who held the public register and enforcement and inspection of licensed sites. The Police were responsible for enforcement against unlicensed sites and dealing with any identified criminal activity and the Environment Agency, as I mentioned were responsible for managing the public

register. This three-agency approach resulted in a degree of confusion when it came to who actually was going to deal with each of these elements. Unfortunately, this in many cases, resulted in very little activity taking place, which was compounded by the effects of austerity on each of the three agencies.

In 2014 there was a significant decrease in commodity process that did play its part in supressing offending and diverted law enforcement attention towards other more pressing areas. I don't think it would be unfair to suggest the police did very little between 2014 and 2019. As metal crime remained low, enforcement resources were diverted elsewhere to deal with existing and emerging policing priorities which is a normal part of policing. The core of knowledgeable and experienced police and support staff were lost, and I suspect the same happened across other enforcement agencies who were involved in tackling metal crime.

I have spoken to large groups of police and licensing officers and the numbers who have an understanding or working knowledge on the 2013 Scrap Metal Dealers Act is very low, and in some cases non-existent. The impact of this lack of knowledge is that it provides an ideal trading environment for those who have criminal intent or are happy to turn a blind eye to what passes through their gates. Its important to understand that the reduction in commodity prices between 2014 and 2019 played a significant role in supressing crime and this is often overlooked.

Jump forward to 2019 and we experienced a rapid increase in commodity prices and as expected, the inevitable happened, thefts began to increase across all sectors. As I have already mentioned, those with the knowledge and skill to step in and tackle the emerging problem had either changed roles, retired, or had lost the skills they had learned leaving a gaping hole in agencies ability to deal with this emerging problem.

This lack of knowledge and the required skills to enforce the legislation is not an easy void to fill as the sector in complex. Licensed sites are rarely, if ever visited and those that do visit don't always have the knowledge and skills to identify and deal with failings. A recent freedom of information request into mobile collectors identified a 70% drop in the numbers licensed when compared to 2014. This may be because of a reduction in those operating, but I suggest the figures point towards a lack of meaningful enforcement and any sort of follow up when licences are not renewed.

In 2019 we hosted a conference and outlined our initial thoughts for a way forward to tackle metal crime which was beginning to grow as an issue. This was followed by a Workshop in the December where we provided an opportunity for our partners to tell us what their issues were and what they wanted us to do. The workshop acted as a starting point and provided the evidence we needed to develop an idea for a partnership that would allow us to look at all aspect of infrastructure crime from training to legislative change. Some of the key points to come out of this workshop were a lack of enforcement, lack of knowledge and experience and no available training to fill this knowledge gap.

The National Infrastructure Crime Reduction Partnership (NICRP) project commenced in December 2020 and over a period of four months we brought partners together, which included UK enforcement agencies, national infrastructure companies, affected sections within industry and the foundations were established. The NICRP is now imbedded within national infrastructure companies, Law enforcement, environmental bodies as well as working closely with Local Authorities and their licensing teams.

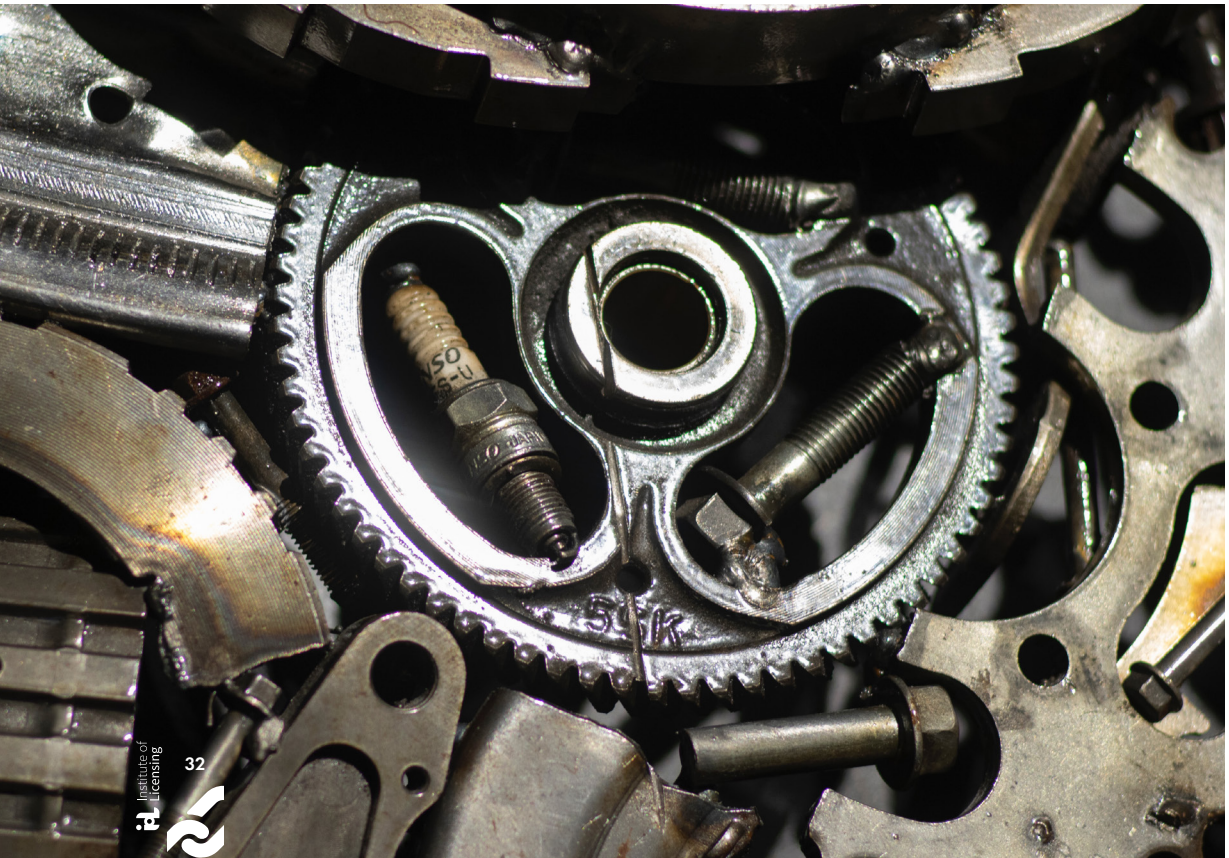
From early 2021 as part of my work in the NICRP I started delivering online training to police, partners and other agencies who have an interest or involvement in tackling metal crime. The results achieved because of this training were very promising and the first national weeks of action highlight the benefit of this online training and how effective it was to agencies when tackling metal crime. At the beginning of December 2021, I commenced a more detailed and widespread programme of training for police, local authorities, and other partners. This has developed into much more comprehensive face-to-face classroom-based training that is being delivered nationally with over 2000 having now taken part in the Metal Crime Awareness Training. This training will continue to be delivered nationally and will equip those involved in enforcement, inspection, and compliance with the skills they require to tackle metal crime. It will give them the knowledge and confidence they need to ensure those covered by the Scrap Metal Dealers Act, who feel it is acceptable to ignore their responsibilities, legislative obligations and turn a blind eye or openly accept illicit material are dealt with robustly.

In September 2022 the Metal Crime Awareness Training was awarded Continual Professional Development Accreditation by CPD Standards which was a big step in terms of raising the profile of the training and the benefits it brings to agencies, individuals and to reducing offending.

The future of metal crime enforcement activity has changed, and in my opinion, it changed at the right time as we need to develop long terms strategies to ensure we do not return to a position where there was very little if any enforcement and large knowledge gaps. We need to move from responding to crime as it happens to being much more focused in term of prevention and in my opinion, this is the most effective strategy when it comes to effectively containing metal related crime. The upskilling of those involved in the enforcement of the Scrap Metal Dealers legislation is fundamental in terms of reducing crime, increasing compliance and this needs to be embedded in a long-term strategy, and not a short-term reaction to current threats.

I have said many times metal crime is a problem that is not going to go away unless enforcement agencies, the recycling sector, national infrastructure, heritage, partners, and victims work together with shared objectives and outcomes. I'm pleased to say are now pulling together with shared objectives and a much clearer strategy in terms of how we tackle this problem. Although there is still a long way to go, we are making progress which is reassuring, but should be reassuringly worrying for those who are not compliant that we are raising our response through training and partnership working.

Robin is working with the Institute of Licensing to complement and expand our existing training on Scrap Metal licensing to include effective enforcement.



National Training Conference

15th, 16th & 17th November 2023

We are delighted to be planning our signature three-day National Training Conference for 2023 to be held in Stratford-upon-Avon.

The programme will include the range of topic areas our regular delegates have come to expect, with well over 50 sessions across the three days delivered by expert speakers and panellists.

See the agenda tab for confirmed speakers. This will be updated as they are confirmed. A draft agenda will follow later in the year.

We look forward to welcoming new and seasoned delegates to the NTC along with our expert speakers and our event sponsors.

Early booking is always advised, and bookings will be confirmed on a first come first served basis.

The Gala Dinner (Thursday evening) is a black tie event, and will have a set theme (theme tbc).

For more information and to book your place, please visit https://www.instituteoflicensing.org/EventItem/GetEventItem/174677

or email events@instituteoflicensing.org

The BBFC: Supporting Licensing Through Film Classification

by Edward Lamberti, Policy Manager, BBFC

Throughout 2023, the British Board of Film Classification is speaking to the UK. We're carrying out our latest Classification Guidelines consultation. We do this every 4-5 years, consulting over 10,000 people. We ask, in effect: what do people think of the age ratings we're giving to films and other content? How have audience attitudes changed in recent times? What might we at the BBFC need to do differently?

This consultation is vitally important to us. By knowing what UK audiences want and expect, we know how we should classify the films they will be watching. And this means that our cinema age ratings always provide up-to-date support to the UK's licensing authorities, who give cinemas permission to show films in the first place. We very much like that we get to provide licensing officers with this support. It's a core part of our work. Indeed, it's the most long-standing part of our work.

More than a century of film classification

In the very early days of film, there was no official system in place to determine who should be allowed to experience this newfangled art form, moving pictures projected onto a big screen. Then the Cinematograph Act 1909 came in, requiring licensing authorities to ensure that venues showing films were meeting health and safety requirements. But a side effect of the legislation was that licensing authorities could also decide whether a particular film could be shown at all. That would be fine, except: how to decide, and how to do so consistently? It was very important for film distributors and audiences to have some certainty.

What was needed – to streamline the process and to ensure consistency – was an independent body. And so the film industry, in 1912, set up the British Board of Film Censors (our previous incarnation, before we changed our name in the 1980s). We began watching cinema films and classifying them. And to this day, this is what we do.

A film classification production line

Typically, the BBFC classifies several hundred films each year for UK cinema release. We can only handle that volume of films – as well as the several thousand other pieces of content we classify each year for video or online release – by running, in effect, a production line.

Think of it like building a car. Stage by stage, team by team, we move a film through our classification process, constructing that film's age rating and content advice. Into that process go our guidelines, our research, our experience, and our awareness of the need to assess content in relation to various laws – for example, those to do with child protection or animal cruelty. At the end of the process, we deliver the age rating and content advice to the distributor. We give them a classification certificate, and they download the BBFC's Black Card for their film to show on screen prior to the film itself. We publish the age rating and content advice on our website and app, to help audiences guide their filmgoing decisions.

I play a small part in that. I've been working at the BBFC for a number of years and I've been Policy Manager since 2020. My colleagues and I provide internal support to the rest of the BBFC to help us all ensure that the classification process remains consistent, transparent and fair to all distributors. The BBFC derives its income from the fees it charges to film and video distributors to submit their content, and from the licence fees it charges to video-on-demand services who wish to carry our age ratings online. As a not-for-profit, we're always

looking for ways to improve efficiency so as to deliver value to the industry while ensuring we cover our costs.

Delivering value for licensing authorities

We see our role as delivering value to licensing authorities as well. Licensing authorities retain the power, under the UK's licensing legislation, to overrule our decisions for the cinemas in their area, should they see a need, but in practice this hardly ever happens. They also have the power to give permission for cinemas to show films we haven't seen, and this does happen – such as with film festivals.

We are happy to provide support and training to licensing officers where there's a need. Managing risk is an important part of this. A film – any film – might contain an issue that makes it unsuitable for children. Protecting children from harm is one of the objectives of the licensing legislation – and it's at the core of what the BBFC looks out for when we're classifying films. And in rare but very important cases, a film might contain something that it is illegal to show on a UK cinema screen. We train the BBFC's compliance officers for weeks before they begin making age rating recommendations for films. We can't turn licensing officers into BBFC compliance officers. But what we can do for licensing officers is highlight key issues that we need to take into account when watching films, so that they can look out for those issues too.

Without the BBFC, licensing authorities would have to make age-rating decisions for all the films being shown in the cinemas in their area. And it would be a burden on their resources to have to do this every day. Building and running the production line would be difficult. And it would need multiple production lines, in multiple parts of the country. The BBFC is a one-stop shop: when a distributor sends their film to us, they can use our age rating all across the UK. And licensing officers only have to get involved if for some reason that rating doesn't work for their area.

A lightning rod

As well as taking the burden of film classification away from licensing authorities, we also take away a lot of the burden when audiences aren't happy. The BBFC receives feedback across the year. Sometimes a cinemagoer is unhappy with the rating we have given a film they have seen, or a film they want to see, and we are used to responding to queries of this nature. We know that striking the right balance isn't easy: there will always be people who think we're too liberal and people who think we're too strict. But we know that, at the very least, we can reassure people that we have made the age-rating decision in step with our guidelines, reflecting what UK audiences tell us, and that even if the specific audience member doesn't agree with what we decided, they understand it. So, when we classify a film, cinemas can refer complaints about the rating to us, and so can the licensing authority. We're the lightning rod, and we're happy to be.

In this year of our latest guidelines consultation, we're excited to find out what UK audiences think about what we currently do. We aim to publish our new guidelines early next year. We're privileged and proud to classify cinema films on behalf of the UK's licensing authorities.

bbfc View what's right for you



12th–16th June 2023

NLW National Licensing Week

NLW celebrates the role and importance of licensing in the UK to keep people safe when enjoying a variety of hospitality and pleasure activities.

Licensing is Everywhere

#NLW2023 @licensingweek





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Important information about your membership renewal

We are in the process of changing over to a new IT system for membership and and events and hope that the new system will be much more user friendly for our members.

In the meantime, the online renewal facility is disabled, so to renew your membership this year, please simply email the team via membership@institituteoflicensing.org and we will take care of the renewal for you.

Not a member?

Make IoL your professional body:

- Increase engagment with licensing peers across the country
- Network with industry, regulatory, and legal professionals
- Share information, and views
- Increase mutual understanding of licensing and related issues
- Benefit from:
  - 12 Regions covering the whole of the UK
  - Bespoke Training
  - Regular eNews updates
  - Professional publications including the **Journal of Licensing** and **LINK Magazine**

If you have any questions please email **membership@instituteoflicensing.org** and one of the team will be happy to assist.