

A close-up photograph of a hand with a gold ring moving a stack of green chips on a green poker table. In the foreground, there are several stacks of red and black chips, and a few playing cards are visible on the table. The background is blurred, showing other people at the table.

**A once in a generation
opportunity for change**

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IoL Regions

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Foreword



By Sue Nelson, Executive Officer

Its hard to believe that we are already enjoying 2023's Autumn (with weather much better than most of the Summer at the time of writing!).

With the IoL's National Training Conference coming up fast (this Edition of LINK will be published to coincide with the start of the NTC), the Team are very much looking forward to seeing many of you in Stratford-upon-Avon for 3 days packed with excellent speakers and topics, and hugely supported by our sponsors who bring a fantastic vibe to the event and of course our delegates who make the whole thing a great success and a pleasure to organise.

This edition of LINK includes a great mix of subjects, opening with Brigid Simmonds' overview of the Gambling White Paper, supported by a Q&A with Adam Hodges from Game Nation, while Gerald Gouriet KC looks at black markets and illegal gambling. Phil Bates and Chris Brown explain how Safer Streets Funding has impacted in Southampton, while Karen Tyrell talks about the changes in attitudes towards and consumption of alcohol, and the need to normalise conversations about drinking and potential harm, along with raising self-awareness.

Also in this edition, Abigail Toms talks about her work with the Local Authority & Regulators' Events Expert Panel (LAREEP) a group which brings together Local Authority and Fire Service Officers who chair Safety Advisory Groups (SAGs) for larger events across the UK. Kirsty Morrison explains the challenges for users of medicinal cannabis and the CANCECARD scheme which may be in operation in licensed venues.

We have important updates from the Shiva Foundation on the issues of modern slavery and how licensing can and should be part of the solution, while Avoen Perryman talks about White Collar boxing and the need for controls through licensing. Finally, Louis Krog provides an update on the discussions surrounding apprenticeship schemes in licensing – a work in progress and not without challenges.

We hope you enjoy this edition of LINK and we are extremely grateful to our contributing authors who have provided some fantastic insights for us to include. Please consider contributing to future editions or send over some suggestions about topics you would like to hear more about!

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The White Paper – opportunity for change



By Brigid Simmonds OBE, Betting and Gaming Council Chairman

Earlier this year, after just over two years of painstaking work, the Gambling White Paper was finally published. Rightly billed as a once in a generation opportunity for change, it will modernise a raft of regulations, with significant ramifications not just for our members and their millions of customers, but also for local councils and licensing authorities.

Like many industries, the betting and gaming sector is a complex ecosystem, incorporating high street betting shops, casinos, bingo halls and the growing online sector, which supports thousands of highly skilled tech jobs many of which are based outside London.

All told, the sector supports 110,000 livelihoods, generates £7.1 billion for the economy and raises £4.2 billion in taxes every year. That should come as no surprise when you consider that each month around 22.5 million adults have a bet, whether it's buying a lottery ticket, playing bingo, visiting land-based betting venues like casinos, bingo halls and bookmakers or having a wager on sports like football and horse racing online.

The overwhelming majority of those who do enjoy a bet do so safely, with the current problem gambling rates at 0.3 per cent of the adult population, according to the Gambling Commission. The BGC was however, set up to drive up standards, we know more can be done, and the White Paper never represented a finish line in that work, but instead a new opportunity to drive big changes.

Some of those changes born of the White Paper are yet to be fully understood or felt, that's because it signalled the starting gun on eight separate consultations, two for the Department of Culture, Media and Sport and six more with the Gambling Commission.

While that work drives on, so does the public debate around gambling, which at times has been ill-informed. Sadly, the facts don't often match the rhetoric. This is particularly true for our land-based members.

Take casinos. They support 10,000 jobs and cater to 16 million customer visits every year, while contributing £300 million annually in taxes. However, for many reasons, it has not been an easy time for these businesses, which are a pillar of the leisure and tourism industry. In 2005 there were 160 casinos in the UK – now there are 118, with three of those closing in recent months.

Meanwhile high street bookmakers support 42,000 jobs, contribute £800 million in tax and £60 million in business rates to local councils. But they too have faced tough economic headwinds. There were 8,355 bookmakers at the beginning of 2019, a figure which dropped to 6,345 last year, a reduction of 24 per cent.



Any regulatory changes which impact those venues' finances further will have an automatic and direct impact on business rate tax take and employment in communities across the country.

And with 89 per cent of customers who use betting shops also using their visit to spend money on the high street, the financial impacts will almost certainly go further.

That is why we support proposals outlined in the White Paper to support casinos, allowing them to offer sports betting as well as modernisations plans on the numbers of games machines, they can offer customers. These have rightly been described as modest – but mission critical – to the casino sector.

The White Paper also delivered on a range of areas the BGC had campaigned for and all of which centred on driving up standards to protect the minority who struggle with their betting while not unduly interfering with those who bet safely.

Those included establishing an Ombudsman to improve consumer redress, enhanced spending checks online so swift interventions can take place and a mandatory levy to fund Research, Education and Treatment to tackle gambling related

harm and problem gambling.

Outside of the White Paper we are also making huge strides in other areas, for example a recent change in our Codes made it a requirement to ensure safer gambling messaging is clearly visible within casinos. A commitment to ensure 20 per cent of radio and TV advertising is devoted to safer gambling messaging has also been extended to online advertising, while we have bolstered safeguards to ensure digital media adverts are only targeted at those who are above the legal age to bet.

The White Paper promised change, and it will come. But it is vital regulations, on the local and national level, are proportionate and balanced. They should be carefully targeted, ensuring the vast majority who enjoy betting and gaming can do so in well-regulated establishments which make a positive contribution wherever they operate. While also ensuring those who struggle are properly protected and can access the available support where necessary.

This is something the BGC and our members are determined to achieve. This should be a shared goal, one that I am sure we can deliver as we see the White Paper's once in a generation proposals become reality and our world class industry continues its combined effort to improve standards.

Engagement in Gambling — Q&A



with Adam Hodges, CEO of Game Nation

Game Nation are one of the top three operators of gaming lounges in the UK with a statement of intent to lead the way in setting new standards for adult entertainment on the high street. Members of the highly regarded Gambling Business Group, which represents the major stakeholders in land based retail gaming, Game Nation has a 360 degree perspective on the operation of venues from the delivery of top quality entertainment to the customer, all the way to applying licensing obligations and objectives - and in all cases, over and beyond the call of duty.

CEO Adam Hodges talks to IOL Link about the relationship between high street gaming businesses and their local authorities, and most importantly, the vital role of maintaining constant engagement and constant appraisal of the licensing process.

Q: The licensing procedure can be a tough journey for many gaming and gambling businesses. Game Nation has experienced both the highs and lows of the process. How do you view the licensing system from an applicant's perspective?

I think we have to start from the premise that the licensing system, by its very nature, is always going to be a complicated task.

And from my own observations, as a national operator, whilst it ticks many of the boxes, I believe the process could definitely benefit from a more consistent procedure.

As you say, we have experienced both ends of the spectrum, so we're able to identify inconsistencies quite quickly and it does impact significantly on our business when some individual local authorities deal with matters differently to others - it creates unnecessary delays and makes the process more challenging.

On the positive side, there are simple solutions to many of

the issues we encounter, especially the minor administration matters. Issues such as change of head office, rebranding to a new trading name - much of this and other simple issues could all be dealt with electronically. That would be a major improvement for both the applicants and local authority departments and would help speed the process up.

But it's also important to recognise that there is a lot of good quality around the LAs. We've been very fortunate to have worked with some really efficient authorities who deal with emails and phone calls very promptly. One case in point is Southampton where we operate four sites.

Q: There have been a number of odd refusals for gambling businesses recently, one of note being an extended hours application declined over drug dealing fears. Given that particular national operator, and indeed the town where the application went in, many would argue that it would be tough to find credible evidence to support the objection. What



impact does this have on an operator's business in terms of delay and costs of an appeal?

The rigour and standards set at late night/24h operations is immense; it's at such a high standard that any drug dealing risks would be negligible and staff are trained to identify these risks.

We have a locked door policy, locked toilets (and toilet/washroom design), and we are rolling out high-definition CCTV (including sound recording) across our business. If anything, the presence of a professional operator would deter drug dealers from the area.

Given the investment that AGC operators put into their operations - which runs into several hundreds of thousands of pounds per site - the idea that drug dealing or any misbehaviour is prevalent in the near vicinity is something we would be determined to eradicate.

As far as licensing is concerned, rejections on grounds like the one you mention, the impact on the business can be fundamental to its success. The delays can lead to ongoing costs with no income, an inability to plan and engage contractors to provide improvements, and with respect to appeals, unnecessary costs and a significant investment in management time for all operators.

And when we assess this impact, we have to look at the overall operation; that delay will impact our local employees, our local service suppliers and our neighbouring businesses. These applications are not just

about the venue - it's about the staff, the business suppliers, the local economy and major investment in the community.

Q: It will always be the case that some council members will be less inclined towards gambling operations, more likely on moral grounds. On a practical level however, it's a different story. During a Met Police tour of one of Game Nation's venues, the force's party were full of praise for your security measures. What safety and community-based initiatives do your operations have in place to protect their customers?

Yes, we were very pleased with the Met Police response. And in fact, it's the same response when local MPs visit our venues and also our competitors' operations.

It has to be said that our security and community activity surprises everyone except our customers and ourselves. Many people seem to overlook the fact that gambling is one of the most rigorously regulated sectors in the British economy. And for land-based operations on our high streets, that regulation is double - not just as a gambling operator, but also as a normal business interacting face to face with its customers.

If we don't meet the criteria of the Gambling Commission and our local authorities, we can't operate. The fact that we do and we are re-inforces the point of how much emphasis we place on customer safety and community engagement.

I think most councillors would be surprised at the vast range of measures we apply to protect our customers - from health and safety to affordability; high quality CCTV to gambling compliance training; identifying customers susceptible to harm to the national walk safe campaign; and age verification through to evaluating player patterns.

It cannot be said that AGC operators on the high street fall short on their commitment to social responsibility measures – and that work is reinforced by trade bodies like the Gambling Business Group who are constantly supporting our efforts in this area and liaising with the regulator and DCMS on the development of new initiatives.

Q: As you've pointed out, the gaming and gambling industry is one of the most regulated in the UK. It's governed by the strictest legislation, regulated by the most powerful regulatory authority, and guided by a raft of local authority rules. Would you say that this tightly controlled governance provides significant credibility to your business and actually delivers confidence in your practices and business philosophy?

In theory, the strict legislation should provide reassurances and confidence, however, as with many issues where some people have strong opinions, it is often the minority with the loudest voice who have impact and influence.

What I would say though, is our experience from a planning perspective is that the application of various legislation and policies may not always be as consistent as one could reasonably expect, both in respect of gambling establishments versus other high street establishments, or indeed across local authorities.

That is an area I would be delighted to explore with the IoL - I think businesses like Game Nation have a lot to contribute to the licensing debate and our input could help move the process forward in a more consistent and dynamic direction.

Q: Finally, away from governance and into the development of the towns you operate in. What kind of investment is required from Game Nation when it makes that decision to open in a new town and refurbish premises; employ local people; train staff; implement all compliance and SR guidelines; and run marketing campaigns to drive footfall through the high street?

Following COVID, many building costs have increased significantly, and combined with the cost of machines, security and safety systems, an investment of half a million pounds in a new site is not unusual.

You also need to remember that opening the doors to a new site on day one does not guarantee income, and ongoing investment in marketing and advertising is required to stimulate awareness.

” We have a strong and resilient framework, now we need to refine it. More consistency, more technology and most important, more dialogue between our business and our local authorities. ”

Like any other high street outlet, growth will take time. The key is our teams; we're proud of our people and spend time and effort training them thoroughly on all aspects of our business, customer service, operations, and importantly, our social responsibility requirements.

Getting the customers through the door is one thing, but if you can't deliver a great experience then you'll struggle to get them back. A

well trained and well managed team can make all the difference.

I've been in the gambling industry for over 35 years and I've seen many positive changes. I am proud to be running a business that's growing and bringing fun and employment to the high street, and one that operates to the highest standards, which as you said earlier in one of your questions, is in an Industry which is one of the most regulated in the UK, is governed by the strictest legislation, regulated by the most powerful regulatory authority and guided by a raft of local authority rules.

We have a strong and resilient framework, now we need to refine it. More consistency, more technology and most important, more dialogue between our business and our local authorities.



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 →
Safety never stops

Black markets and illegal gambling operators



By Gerald Gouriet KC

Introduction

Chapter 3 of the White Paper deals with “the threat of an online gambling black market” and expresses legitimate concerns about “an increasing number of illegal websites... run by individuals with suspected links to serious and organised crime”. It points out that “the black market is relatively easy for people to access who are actively trying to find and gamble with illegal operators online”.

To counter the threat, it is proposed to give the Gambling Commission “new powers”, which are explained (in bold font) at paragraph 42 of the White Paper –

“We will introduce legislation that will give the Gambling Commission the power to apply to the court for an order that requires ISPs [Internet Service Providers], payment providers and other providers of ‘ancillary services’ to implement measures aimed at disrupting the business of an illegal gambling operator.”

The shift in language from “black market” to “illegal gambling operator” should not pass unnoticed, because the two are far from synonymous. Disrupting the business of an illegal gambling operator “with suspected links to serious and organised crime” is unlikely to be controversial. But it might surprise anyone instinctively inclined to applaud the above proposal to learn that what it calls an “illegal gambling operator” includes a licensed operator in a foreign jurisdiction who is operating wholly within the terms of his licence and in accordance with the laws of that country.

This article will examine: (1) the UK’s claim to jurisdiction over gambling operators licensed overseas; (2) the enforcement of extra-territorial claims to jurisdiction; (3) how the Gambling Commission currently addresses the

problems of enforcement; (4) the White Paper proposals to facilitate enforcement; and (5) how third parties may be affected.

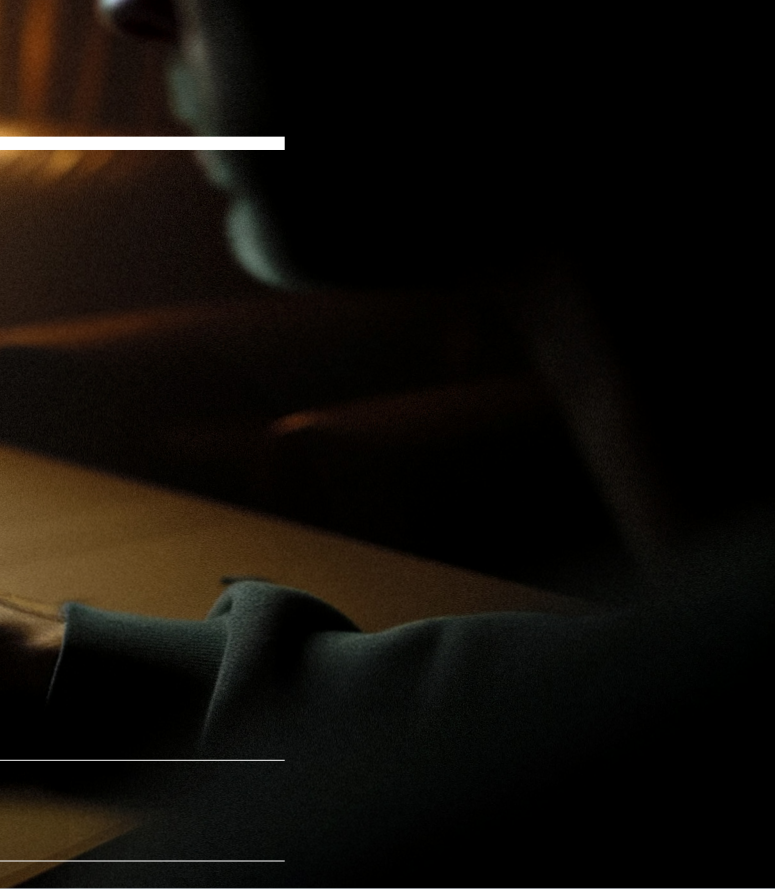
1. The UK’s claim to jurisdiction

The standard justification for UK regulation of a licensed overseas operator is ‘player protection’: it is pointed out that the issue by an overseas regulator of a licence to provide gambling facilities does not guarantee that the licensee is a responsible or even an honest operator. Much depends on who issues the licence. The White Paper explains –

“The Commission is also seeing an increasing number of illegal websites that originate in jurisdictions with either extremely permissive regulatory regimes or no regulatory oversight, and/or are being run by individuals with suspected links to serious and organised crime”.

Four different scenarios are grouped together in that passage, not necessarily deserving of the same regulatory response: illegal websites; websites originating in jurisdictions with extremely permissive licensing regimes (i.e. not illegal under local law); websites originating in jurisdictions with no regulatory oversight (i.e. not prohibited by local law); and websites run by individuals with links to serious and organised crime.

Not every gambling licence issued overseas falls into one or other of those four categories. There are jurisdictions where gambling is recognised by the High Court as “subject to appropriate levels of regulation” [1]; and others where regulatory control is less permissive than in the UK, and “forms of gambling permitted in the United Kingdom are either prohibited or provided only by a State or State sanctioned monopoly or exclusive



licensee.” [2] There are also countries whose licensing regimes, although they may diverge from the paths taken by the 2005 Act or the Gambling Commission, have adopted an approach to regulatory control which

by no stretch of the imagination can be called “extremely permissive” – it just happens to be different from ours. The Gambling Commission acknowledges these, and there is mutual cooperation between some of them and the Commission.

(Since publishing this article, I have been reminded that until 2014 Antigua, Alderney, Gibraltar, the Isle of Man and Tasmania, amongst other jurisdictions, were awarded ‘white listed status’ by the Secretary of State on the basis that they offered “equivalent levels of protection and regulation to the UK”.)

In 2014, however, the UK government effectively decided that if online gambling services originating from anywhere overseas can be accessed by someone in Great Britain, then the provider of them must hold a licence issued by the Gambling Commission in addition to whatever licence or licences he holds in his home country. If he does not hold an operating licence from the Gambling Commission, then in the eyes of UK law he is operating illegally, no matter how “appropriate” the level of gambling regulation where he is licensed, no matter how “equivalent” it may be to UK levels of player protection, and no matter how strict the terms of his overseas licence.

Gambling (Licensing and Advertising) Act 2014
Broadly speaking, section 33 of the Gambling Act 2005 (“the 2005 Act”) makes it an offence for anyone who is not the holder of an operating licence issued by the Gambling Commission to provide facilities for gambling. [3]
Until 2014, section 36(3) of the 2005 Act provided that section 33 applied to the provision of facilities for remote

gambling only if at least one piece of remote gambling equipment used in the provision of the facilities was situated in Great Britain. Section 36(3), however, was amended by the Gambling (Licensing and Advertising) Act 2014 (“the 2014 Act”) so as to apply section 33 to the provision of facilities for remote gambling, even if no piece of gambling equipment is situated in Great Britain, if the gambling facilities provided overseas are used in Great Britain. Although section 36(3A) goes on to say that an offence under section 33 is only committed if the person providing the gambling facilities knows or should know that the facilities are used or likely to be used in Great Britain, “knows or should know” and “used or likely to be used” are broad concepts which in practice extend the reach of potential criminality to just about anyone who places a gambling website on the Internet. (I deal with geo-blocking and virtual private networks later in this article.)

The Gibraltar Betting and Gambling

Association challenged the legality of the 2014 Act by way of judicial review. The Government of Gibraltar, together with the Gibraltar Gambling Commission, joined as interested parties [4]. In the course of his judgment, Green J explained the effect of the amendment to section 36(3) [5] –

“It is apparent, therefore, that an off-shore provider of gambling services will provide ‘facilities for gambling’ in the UK simply by virtue of the fact that he creates facilities which may be accessed in the United Kingdom; and this arises even if the operator has no physical presence in the United Kingdom.”

That passage revives some old chestnuts: are off-shore gambling services on a website accessed in the United Kingdom or from the United Kingdom? In other words – and for the purposes of gambling regulation – does the website come to the UK player, or does the player go to the website? If we take the location of the off-shore website to be where the server is, how does the UK justify its regulation by the Gambling Commission?

Green J doesn’t indulge in those abstract considerations: it is a ‘given’ in his judgment that an offshore Internet gambling site that is accessed from the UK is accessed in the UK; and he offers the following justification for UK regulation of it –

“It seems to me that if the Government cannot lawfully move to a point of consumption regime that the prospect of any form of regulation of remote e-commerce becomes exceedingly difficult.”

The principal legal challenge in the Gibraltar case was that the licensing regime brought in by the 2014 Act was unlawful in that it was a disproportionate restriction on the freedom to provide services guaranteed by Article 56 of the Treaty on the Functioning of the European Union. The challenge failed. This is not the place, nor am I the person, to embark on a discussion of the EU jurisprudence which led to Green J dismissing the claim; but a passage in his 100-page judgment is indicative, to my mind, of a general approach that was destined to be fatal to the application:

“Routinely, the [European] Court has acknowledged that many Member States view gambling as impinging harmfully upon their moral, religious and cultural traditions and beliefs and gambling is frequently associated with a “high risk of crime”. ... The Court also recognises that gambling incites spending which “... may have damaging individual and social consequences”. This is not an area where the ordinary libertarian instincts of the Court to encourage free and unfettered trade are discernible. As already observed... the Court has stated that free competition in relation to gambling tends towards consumer harm not benefit.”[6]

2. Enforcement of Extra-territorial Jurisdiction

An Internet search of the words ‘extra-territorial jurisdiction’ yields a number of near-identical hits, most of which seem to derive from a succinct entry in Wikipedia. (Either that, or the entry in Wikipedia derives from them.) –

“Extraterritorial jurisdiction (ETJ) is the legal ability of a government to exercise authority beyond its normal boundaries. Any authority can claim ETJ over any external territory they wish. However, for the claim to be effective in the external territory (except by the exercise of force), it must be agreed either with the legal authority in the external territory, or with a legal authority that covers both territories.

Enforcement of a unilateral declaration of overseas jurisdiction is likely to be problematic. The White Paper’s statement – “Most sites are based in overseas jurisdictions where prosecution would be impractical” – is something of an understatement: it is not the impracticality of prosecution which stands in the way of enforcement, it is the lack of jurisdiction.

One of the arguments in the Gibraltar case was that the 2014 Act regime would be ineffective in protecting consumers because it could not be properly enforced and that this rendered it disproportionate, given the high burden it imposes on operators and the relative benefits of alternative proposals [7]. The argument was rejected. At paragraph 116, Green J said –

“By the very nature of the internet there will be difficulties for any regulator in exercising total supervision over offshore operators. The Government recognises that there is no such thing as an enforcement regime which is 100% perfect or efficient. But it takes the view that a combination of goodwill amongst service providers, the threat of criminal and other regulatory sanctions, and cooperation with foreign regulators, will prove sufficiently robust. Unless it is possible to discern material and central errors in this reasoning this is a perfectly logical policy stance for Parliament to take.”

And at paragraph 176 –

“In my judgment, Parliament was perfectly entitled to form the opinion that the new regime would not create significant enforcement problems.”

3. The Gambling Commission’s approach to enforcement

The Gambling Commission’s current approach to the enforcement of its extra-territorial jurisdiction is along the lines identified by Green J, and is explained in paragraph 39 of the White Paper:

- In most cases, the Commission will begin by issuing a Cease-and-Desist letter, requiring the operator to stop offering services to, or permitting access by, British consumers.
- The operator may then agree to ‘geo-block’ its services, preventing access to its website from computers located in Great Britain.
- If there is no satisfactory response to the Cease-and-Desist letter, the Commission will employ ‘disruption techniques’, using the errant operator’s partnerships or relationships with other companies. These techniques include asking web hosting companies to suspend or ‘block’ (IP block) British consumers from accessing the websites, contacting payment providers to remove payment services, and liaising with social media sites to prevent websites appearing on search engines or being hosted.
- The Commission also engages with international regulators, “sharing information and raising the prominence of this issue.”

I have italicised the words “or permitting access” in the first bullet-point above, because the discussion about disrupting the business of an overseas operator not licensed in the UK frequently vacillates between the regulation of gambling websites targeted at GB customers, and the regulation of websites merely accessible by them. For example, in the Gibraltar litigation, Green J said – “It seems to me obvious that in relation to an activity which is potentially socially divisive, such as on-line gambling, that those who provide the service should be subject to regulation in the State they target”. [8]

And he also said –

“... an operator, wherever they are located in the world, whose services are capable of being used by customers in Great Britain and who is not licensed by the GC will attract criminal liability if it advertises its services in this jurisdiction. This will apply even if the operator has no intention of targeting British customers but is not able effectively to block such customers accessing its services.” [9] [emphasis added]

The language – “permitting access”, “targeting British customers” – suggests that a degree of recognisable culpability is expected in overseas operators before they are branded as criminals. But that is not so. The 2014 Act criminalises the mere provision of an overseas gambling website not licensed by the Gambling Commission if it is used by GB customers and the person providing it ought

to know it is likely to be used by them. Although there may be little sympathy for an unlicensed operator who deliberately targets GB players with gambling facilities, I am uncomfortable about criminal liability attaching to an overseas operator who is licensed by his domestic regulator, “has no intention of targeting British customers”, but is unable to stop GB players accessing his website. He is certainly not targeting GB players: if anything, they are targeting him.

Geo-blocking

The inability “effectively” to block British customers points to the deficiencies of geo-blocking.

Geo-blocking is the restriction of access to Internet websites, depending on the geographical location of the person seeking access. The IP address of the device used by that person determines the country of use, and ‘geo-blocking’ software on the website is able to block access to it from that country.

A person wishing to circumvent geo-blocking can do so using a Virtual Private Network (“VPN”). The Internet is full of advertisements for VPN software, telling prospective purchasers: “How to get around geo-blocking with a VPN”. A typical advertisement reads –

“Looking to get around geo-blocking and spoof your location? We explain how to bypass online censorship and access region-locked services.

VPNs work by routing your traffic through a server in another country. This hides your real IP address – which is often used to determine your location – and replaces it with a temporary, country-specific IP address. As a result, most geo-restricted platforms can’t tell the difference between a VPN user and someone who’s actually in the required location.”

I was bemused to find VPN software on my iPhone and iPad, which had been installed (without asking me if I wanted it) on a routine systems update. But ‘free’ VPNs are not always compatible with the software on gambling sites. Many purchased VPNs, however, claim that they are.

It seems to me that the disruption of the business of a licensed overseas operator, whose website geo-blocks access from Great Britain but is accessed by GB players using VPNs to ‘spoof’ their location, is not so much a measure aimed at the overseas business, as it is a restriction on the freedom of GB players to gamble where they wish. In the Gibraltar case, Green J said –

“Even where operators are subject to appropriate levels of regulation overseas there are different regulatory standards and approaches. There is limited consensus in areas such as standards and software testing which inevitably means that British consumers may experience varying levels of protection depending on which operator they deal with.”

That is undoubtedly so. But I question whether it is the legitimate business of the UK government to prevent British consumers choosing to access overseas online websites that are “subject to appropriate levels of regulation overseas” – and making that choice because they are indifferent to the fact that the ‘appropriate’ regulation in question is not conducted by the Gambling Commission, and are unconcerned that they “may experience varying levels of protection depending on which operator they deal with”.

4. The White Paper proposals

The White Paper proposes that the threat from online gambling sites can be countered in two ways:

The first is aspirational: the Gambling Commission would like to strengthen its engagement with international regulators and reach agreements with them to take more effective action when an operator licensed in one jurisdiction operates illegally in another.

The aim is that:

- an operator licensed overseas “could face regulatory action” in that jurisdiction for operating without a licence in Britain; and likewise –
- operators licensed in Britain “could face action by the Commission” if they were found to have operated illegally in the jurisdiction of one of the Commission’s international partners.

It is difficult to see how this proposal is about player protection. If it is, it is rather insulting to the international regulator and an awkward admission by Gambling Commission to say: “We are asking for your cooperation in making sure that for their own protection our citizens don’t gamble with those whom you have licensed, and for their own protection your citizens don’t gamble with those whom we have licensed.”

The second would give the Commission’s ‘disruption techniques’ the force of law. Currently, they rely on the voluntary cooperation of Internet Service Providers, Payment Providers and those who host social media sites: the proposal in the White Paper is that anyone who does not cooperate voluntarily could be made to do so under the compulsion of a court order. It is helpful to refresh memories of the proposal itself –

“We will introduce legislation that will give the Gambling Commission the power to apply to the court for an order that requires ISPs [Internet Service Providers], payment providers and other providers of ‘ancillary services’ to implement measures aimed at disrupting the business of an illegal gambling operator.”

The wording, perhaps, could be improved: the idea is to give the courts the power to make such an order, and the Gambling Commission (and only the Commission) authority to apply to the court for that power to be exercised.

5. Impact on third party “providers of ancillary services”

It is not altogether clear what is meant by “providers of ancillary services”. We can hazard a guess at the general meaning – but how wide is the net to be cast? I am instinctively uneasy that anyone who provides ‘ancillary services’ (i.e. not facilities for gambling), should be strong-armed by court order to give unwilling assistance in disrupting the business of an otherwise lawful overseas operator.

Nor is it clear how far ‘disruption’ may legitimately go. Are the websites of blameless third parties to be taken down? Are they to be regarded as regrettable but unavoidable collateral damage in the crusade to ensure that no one in Great Britain has Internet access to a gambling site that is not supervised by the Gambling Commission?

The White Paper tries to play down what to my mind is an extraordinary and far-reaching proposal. With beguiling insouciance, the paper says: “We expect that in most cases service providers will as at present act on the information provided by the Commission, and it will not be required to use its power to apply for a court order very often.” But

that doesn’t reassure me: I am old enough to remember the archetypal schoolmaster who told us, with an unpleasant smile, that he didn’t expect to have to use (very often) the cane that he smacked into the palm of his left hand – leaving no one in doubt that he had every intention of using it as often as occasion demanded, if we didn’t do exactly as he said.

Conclusions

The Internet was first made available to the public in April 1993. It is understandable that a mere 30 years later, we are still grappling with the implications of it and trying to ensure we reap the benefits while mitigating against the harms – many of which are only now being realised; and some, no doubt, are yet to be identified.

I am concerned that in our determination to bring down ‘the bad guys’ of online gambling, we may be insufficiently mindful that some of ‘the good guys’ might get caught in the cross-fire.



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Safer Streets in Southampton



By Chris Brown and Phil Bates, Southampton City Council

Southampton is a vibrant and diverse city. But like many places across the UK, levels of crime and disorder are something that concern our residents, and something we continuously look to improve and respond to.

Violent crime, domestic crimes and sexual offences have consistently featured among the top priority areas in Southampton for the last four years. Recent Safe City Partnership strategic assessments have shown we have challenges in:

- Preventing and reducing sexual offences
- Tackling knife crime
- Hotspots of crime and ASB linked to the weekend nighttime economy in the city centre.

As a council, we play an active role in co-ordinating a variety of projects delivered by partner agencies and within our internal teams, to tackle the issues that matter most for our residents and communities. We bid for Government funding that enables us to deliver our ambition of being a Safer City, with Violence Against Women and Girls (VAWG) and safety in the night-time economy being key focus areas.

In 2022, following a successful bid, Southampton City Council was awarded £645,645 by the Home Office from the fourth round of the Safer Streets funding. This has supported many initiatives to tackle violence against women and girls, anti-social behaviour, and neighbourhood crimes. A further £150,000 was secured, concentrating on improving the safety of women at night.

Additional surveillance

Using Safer Streets 4 funding, several new cameras have

been installed in key locations of the night-time economy district. From spotting suspicious or predatory behaviour to antisocial behaviour outside venues, CCTV plays a key role when responding to live incidents. It's often called upon for evidence and is an important link for agencies.

It also funded an additional CCTV monitoring officer, a dedicated resource on busy weekend nights, to allow concentration on VAWG within the city centre. These extra surveillance measures means that potential incidents can be spotted quickly, and promptly informed to relevant organisations via the link radio to try and deter crimes from happening.

Behaviour Detection Officer Training has also been delivered to Officers within Hampshire & Isle of Wight Constabulary - a skill that has supported the night-time economy operation. Since deployment there has been an increase in the number of stop and searches taking place with positive outcomes as well as dispersal notices issued. While these officers are trained to detect suspicious behaviour in relation to Violence Against Women and Girls, it can and has resulted in positive outcomes in relation to other offences too.

Recognising vulnerability

In addition to police patrols, and all year-round support from Street Pastors, Safe and Well monitors patrol busy areas near the nighttime economy venues. This includes the quieter, less visible streets and darker areas. As specially trained Security Industry Authority (SIA) staff, they recognise vulnerability and predatory behaviours and are linked with door staff at venues to increase protective factors.

Two personnel on behalf of the Business Improvement District



“Alone we can do so little; together we can do so much”

(BID) were also funded to patrol the busy areas of the city centre on Fridays and Saturday nights from 9pm to 5am. Night-time economy venues have also benefitted from online awareness training covering spiking, sexual harassment and vulnerability in order to help prevent these things from happening.

Regular Safe Zone

St John’s Ambulance provides a ‘pop-up safe zone’ in the city centre, supporting those who may be vulnerable on a night out or in need of minor medical treatment. During 2021-2022, 90 clinical cases were treated of which 55 incidents would have otherwise needed an ambulance to be called, therefore reducing demand on the NHS.

Working in partnership with other agencies, the team are tuned into the shared radio network and help with a range of issues. From addressing injuries or spiking concerns to assisting people who have lost their keys or wallet and have no way of getting home, they provide a safe space for anyone who feels vulnerable.

Safety initiatives for students

As a city with two universities, Violence Against Women & Girls is of high priority for both Student Unions. Acting on feedback from students, we have collaborated on bringing their safety campaigns and initiatives to life.

Helping students to feel safer on a night out and ensuring students get home safely were two priority areas. As well as supporting the universities during Freshers’ Weeks, the Safer Streets Funding has provided personal alarms, stop-tops and drink testing strips. It’s also implemented safe lit walking

routes and a free taxi service from the library to their home or train station. This legacy work is only the beginning, and both universities have more ideas to help increase feelings of safety.

Partnership working in action

Joining up at an operational level can make a huge difference, by sharing vital insights, and trusted working relationships. The city’s multi-agency approach to keeping people safe in the nighttime economy in the city centre proves that alone we can do so little but together we can do so much.

In February 2023, Southampton was accredited Purple Flag Status. Organised by the Association of Town and City Management (ATCM), the award recognises cities and towns that take measures to ensure their vibrant centres are safe, diverse, vibrant, appealing, well-managed, and offer a positive experience to consumers during the evening.

To manage the numerous partners supporting the night time economy, there is a weekly de-brief with all partners, a monthly meeting for responsible authorities to identify problem areas and a quarterly meeting to review the previous quarter and plan resources as part of the forward plan.

Southampton’s statutory partners continue to maintain that the city is safe, however, we recognise that there is more to do to ensure the public feel safer, and all agencies recognise the need to enable our residents, our businesses and those we work with understand more about the work that goes on in the city to promote the safety of those who live, work and visit the city, and reduce crime.

Drinking Trends, Help and Self Awareness



By Karen Tyrell, CEO of the Charity Drinkaware

I've spent over 20 years working in alcohol and drug treatment services. Over that time, I have seen firsthand the impressive and often difficult changes people can make in order to live substance free. There is nothing more amazing than witnessing someone moving into recovery and getting their life back on track.

However, treatment services exist within an underfunded system that is fundamentally not working. At present, we have a system that waits for people to become unwell, before providing them with help and support. This is not the fault of those charities and NHS bodies providing the care – but of how we think about alcohol as a society, whether we care enough to fund services to help people who need them, and whether we're ready to start talking more openly about alcohol.

When Drinkaware was created in 2006 by both government and industry, alcohol consumption was increasing in certain populations, and alcopops, binge drinking, and alcohol-fuelled social disorder were regularly in the news. Alcohol harm was considered to be a pervasive issue in society. Investment in treatment was prioritised, and alcohol was a focus on both crime and health agendas.

Since then the wider landscape has changed significantly. The UK government has reduced its focus on alcohol harm, with no national alcohol strategy now in place across England. Scotland, Wales and Northern Ireland have moved further and faster and their policy positions on alcohol have diverged. Alcohol treatment services have become fully integrated with services for those with wider substance misuse problems, with sadly only one in five dependent drinkers finding help. Many local and community alcohol support groups and charities have closed.

Today, there is a compelling need for more to be done. In 2021, there were 9,641 deaths from alcohol-specific causes registered in the UK, the highest number on record. These statistics are absolutely devastating, each number masking an individual family tragedy. The alcohol harm paradox also remains – where people in lower socioeconomic groups are less likely to drink but experience more alcohol – related problems.

**Everybody,
everywhere**
let's check our drinking

Check your drinking with our free online drinking check.

drinkaware

It only takes a minute to:



boil the kettle



raid the fridge



check your drinking

Check your drinking with our free online drinking check.

drinkaware

The way we purchase and consume alcohol has changed too. There has been a significant shift to drinking at home, a steep rise in online purchasing, and an increasing trend of drinking alone. There has been polarisation too, according to our recent report, *The Sober Myth: Are Young People Really a Generation of Non-Drinkers*, young people have the highest rate of non-drinking, 21 per cent, compared to 13 per cent of over 25s. We have also seen a reduction in drink driving and the overall age of first consumption has increased.

Many of us know someone who is drinking at increasing risk or harmful levels. We need to reach many more of them, offering simple tools and techniques to moderate their drinking. We need to make it normal to talk about drinking, and normal to check your drinking from time to time and make small changes if needed. And importantly, make it normal to ask for, and find, help if required. Everyone should be able to live their life and have a healthier relationship with alcohol.

We think checking your alcohol consumption should be as straightforward and regular as checking your blood pressure.

Since our inception in 2006, Drinkaware has widened the use of Interventions and Brief Advice (IBA), a short, light-touch evidence-based tool that helps people understand their alcohol consumption and provides them with some brief advice and information tailored to their individual need.

Outside the NHS, Drinkaware are the largest provider of IBAs in the UK. Our assessment and screening tools, including our IBA are disproportionately used by risky drinkers and so have the potential to reach those who might not regularly engage with healthcare providers. In 2022, there were more than 355,000 completions of our digital IBA, but we know there are eight million increasing risk drinkers in the UK, and we want to reach them.

Throughout this year we have been redesigning our digital IBA. The Drinkaware Drinking Check is our new more personalised IBA and can be accessed online anytime. People

complete a short questionnaire and then receive tailored advice and information based on their answers. If they want to they can complete further modules designed to help them really understand their drinking habits and behaviours. We will continue to update and improve the Drinkaware Drinking Check over the coming months.

We want to increase and improve the conversations we are having with each other about our alcohol consumption. We recognise that IBAs are not a silver bullet for reducing alcohol harm. However, getting more people to understand how much they are drinking and make informed decisions about their drinking can help to reduce the harm it can cause.

Our annual Monitor of the UK's drinking habits shows that 58 per cent of those who drink over the Chief Medical Officer's guidelines of 14 units a week have never been asked to complete an alcohol assessment. A key advantage of our Drinking Check is that it can be delivered at scale but also targeted to when drinkers are most likely to be thinking about their drinking and at groups at higher risk of harm.

We see the Drinkaware Drinking Check as a vital way of helping to normalise the conversation around alcohol. To do this, we are starting an ambitious multi-year set of activities to improve and develop it with new features and content to help destigmatise having open and honest conversations about alcohol consumption.

By 2025 we want to reach a total of two million completions. But know that change doesn't happen because of what any one organisation does. We are working closely with the major producers of alcohol; pubs; restaurants; and supermarkets and partners outside of the alcohol industry to help us reach people and communities from all walks of life.

If you think you can help, or want to discuss some ideas, let's talk. I would love to hear from you. And why not take our Drinkaware Drinking Check www.drinkaware.co.uk

Understand more about your drinking. Let's check our drinking.

Check your drinking with our free online drinking check.



drinkaware

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

23rd, 27th, 30th November and 12th December 2023.

Online via Zoom

The training will focus on the practical issues that a licensing practitioner will need to be aware of when dealing with Alcohol and entertainment, gambling, taxi and private hire, scrap metal and sex establishments. 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.



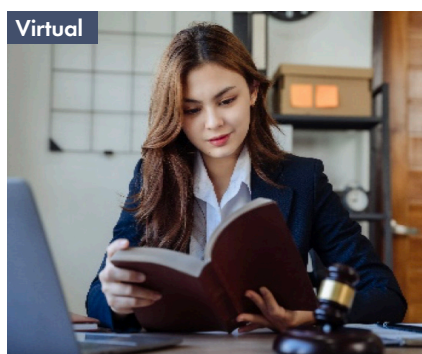
Taxi Licensing

Advanced 28th November 2023 (via Zoom)

Basic 4th December 2023 (via Microsoft Teams)
5th February 2024 (via Zoom)

The basic course will give new/inexperienced delegates working in the field of taxi and private hire licensing a broad understanding of the licensing regime from a practical and operational perspective to support their day to day role.

The advanced course looks in detail at the hackney carriage and private hire licensing regime and the role and functions of the licensing authority.

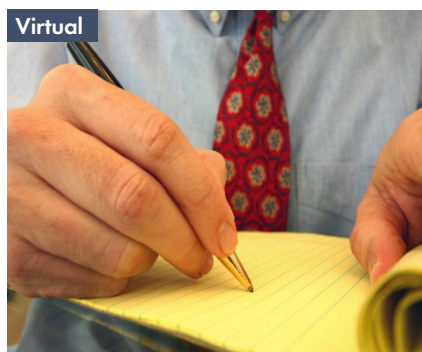


Preparing for Court

Half Day 12th December 2023

Online via Microsoft Teams

This half day training course will help prepare local authority officers for giving evidence in the Magistrates' Court. It is suitable for anyone with an appeal hearing or who is preparing to give evidence on a prosecution case.



Investigators PACE Course

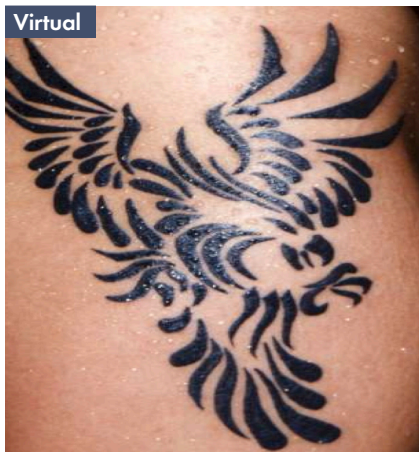
Half Day 13th December 2023

Online via Zoom

This online half day course is aimed at Local Authority Officers and covers the theory behind conducting PACE taped interview and written statements. The course is suitable for Licensing Officers, Environmental Health Officers, Trading Standards Officers and Planning Enforcement Officers.

Contact the IoL team

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



Acupuncture, Tattoo and Cosmetic Skin Piercing (FOR DELEGATES OUTSIDE LONDON)

17th January 2024

Online via Microsoft Teams

There are an increasing number of people in the UK indulging in all four areas of skin piercing activity. Tattoo's, cosmetic piercing, electrolysis and acupuncture. In addition, new fashion trends have seen a whole set of new procedures such as micro blading and micro pigmentation.

To keep up to speed with the new trends, caselaw and methodology, the Institute of Licensing has updated this course to consolidate best practice and include new advice and explain the current trends found in many salons and parlours across England and Wales. All four areas are covered in this extensive one-day course.



Licensing Act Enforcement

18th January 2024

Online via Zoom

This one-day training provides an in depth look at the framework of the Licensing Act and associated enforcement powers available under the legislation. The session will also explore the role and functions of the licensing authority, the general principles of enforcement, powers of entry available and use of the mechanisms in the legislation to ensure that those administering, enforcing and operating under the regime can confidently uphold the licensing objectives.

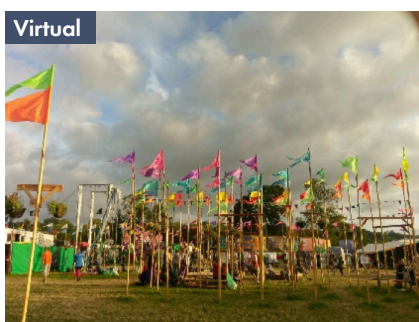


Safeguarding through Licensing

23rd January 2024

Online via Zoom

The Institute of Licensing is hosting this online conference to discuss the current position, and bring expert speakers together to discuss how licensing can be utilised to best effect. Let's work together to highlight the relevance of licensing and the importance of safeguarding.



Working in Safety Advisory Groups

1st February 2024

Online via Microsoft Teams

This one-day online course (via MS Teams) is suitable for all persons involved in Safety Advisory Groups, including core members and representatives.

LAREEP

– just what is it?



By Abigail Toms, Environmental Protection Manager at Winchester City Council and LAREEP member

The Local Authority & Regulators' Events Expert Panel (LAREEP) was set up in May 2021 by the Office for Product Safety & Standards in UK (OPSS), a division of Department for Business, Energy and Industrial Strategy (BEIS).

It brought together Local Authority and Fire Service Officers who chair Safety Advisory Groups (SAGs) for larger events across the UK, including representatives dealing with Glastonbury, Notting Hill Carnival, Latitude Festival, Wireless Festival, Download Festival, Isle of Wight Festival, Reading and Leeds Festivals, Boomtown, Creamfields, Pride and many, many more. The scope includes any event, whether they are music orientated, travellers' fairs, religious festivals or motorsports.

Many would consider this group long overdue, as in the absence of any specific legislation, varying priorities and resource limitations, SAGs have created their own ways of working, leading to a big variation in how they operate across the Country. This is a frequent criticism of Event Organisers, who may encounter SAG interactions that range from too little support to overzealous intervention.

So what's the role of the group? LAREEP's key role/function includes:

- providing technical, professional, and moral support to each other in delivering SAG interventions – for example, the group recent discussed assisting smaller

events, FOIs, event matrix tools, water supply advice, etc

- reviewing the operation of SAGs – e.g. there have been discussions around membership and chairing of SAGs, conflicts of interest, the benefit of training SAG members, sharing terms of reference etc
- discussing interpretation of legislation and guidance –e.g the group had a presentation on Martyn's law
- consolidated feedback on some consultations – whilst the group is an informal one, there is such a collective wealth of experience within group members that it would be a shame not to tap into it! They have commented on some consultations, for example the new 'SAG Chapter' of the Purple Guide.
- discussing compliance solutions and application of controls -debrief feedback is given to learn from events (within confidential boundaries)
- achieving consistency in compliance advice



- asking Event Organisers about their experiences/priorities/issues – the Chair of the group Louise Watkinson sits on the Event Industry Forum panel and the group are looking to do further work with Event Organisers groups.
- promoting and sharing best practice to underpin regulatory advice, liaising with other OPSS Expert groups as appropriate
- working with other organisations as appropriate (Chartered Institute of Environmental Health, Food Standards Agency, Health and Safety Executive, National Fire Chiefs Council and most recently the Institute of Licensing) –many of the members of the group are already members of IoL and the group is looking to strengthen its relationship with the IoL
- working with other topic groups, organisations, and networks as appropriate, to provide the expertise for considering and trialling new guidance and approaches for matters within the group’s remit
- develop tools and resources to share with Local Authority Regulators – documents are accessible to the group on knowledge hub

Co-Chaired by Louise Watkinson (Assistant Director of Public Protection - London Borough of Bromley) and Ian Read (Head of Emergency Planning & Business Continuity

– Lincolnshire County Council), the group meets quarterly with a board that meets monthly.

I was speaking to an Event Organiser the other day who said ‘What we’d like from a Safety Advisory Group’ is for them to be our ‘critical friend’. It seems to me that the majority of SAGs and Event Organisers share the same end goal.... to be able to run events that contribute to the overall cultural vibrancy of our Cities and towns, but to ensure that events are run safely.....this long overdue group intends to work towards this shared goal.



Development of a Local Authority Licensing Officer Apprenticeship



By Louis Krog, Cheltenham Borough Council and IoL National Communications Officer

During the 2022 National Training Conference, I led a session on licensing apprenticeships with Jeremy Scorer from HIT Training. The session reflected on the inadequacies of the current apprenticeship options. In summary, none of the existing apprenticeships were considered adequate to serve the purpose of producing competent and qualified entry level licensing officers at the end of the apprenticeship.

The conversations and reflections from the room supported the fact that the current apprenticeship options were of no practical use. Jeremy and I heard from licensing officers, managers and elected members about recruitment and retention difficulties and challenges in finding suitably knowledgeable and experienced officers. The practical consequences of this was licensing officers delaying retirement or having to invest a huge amount of their time and resources to train new and inexperienced staff.

It was blindingly obvious that there is a clear business need for some form of a Local Authority Licensing Officer apprenticeship programme.

In January 2023, the IoL's Board was approached with an outline business case to submit a proposal to the Institute for Apprenticeships and Technical Education for the development of a new licensing officer apprenticeship.

What the membership told us

Following approval, and to inform the proposal, the IoL surveyed its members on their experiences and reflections regarding apprenticeship and their effectiveness.

- Over 65% said they had experienced difficulties in recruiting licensing officers. The biggest factors contributing to this were filling vacancies with sufficiently

skilled licensing staff and lack of applicants/applications for vacant posts.

- Over 73% felt that existing apprenticeships were inadequate delivering the necessary skills, understanding and experience to become a competent licensing officer.
- A whopping 99% of IoL members, who responded, said they saw the value in setting up a Licensing Officer Apprenticeship.
- An equally whopping 92% of member respondents confirmed that they would be "likely" to offer such an apprenticeship role.

With a clear need and business case, we submitted the proposal to the Institute for Apprenticeships and Technical Education in March 2023.

The development of a new apprenticeship (or Occupational Standard) is quite complicated and there are strict processes to follow. Briefly, the proposed Occupational Standard needs to be submitted with a comprehensive overview of the standard's expected "Knowledge, Skills and Behaviours".

Five months' worth of work and correspondence to develop the Licensing Officer Occupational Standard culminated in a meeting with the Institute for Apprenticeships in September 2023, giving us an opportunity to make our final pitch for the need and benefits of the proposed specialist Licensing Officer apprenticeship.

Some readers may be aware of the Regulatory Compliance Officer (RCO) Apprenticeship. Our starting point was to consider the need for a specialist licensing officer apprenticeship in the knowledge of the existing RCO apprenticeship.



We felt strongly that the RCO option would be a good all-rounder for anyone wanting to work general enforcement, ensuring compliance with a variety of services including licensing, environmental health and trading standards under advice and guidance from specialist officers in the relevant teams. That was the point – what we needed was a specialist apprenticeship which would focus on licensing law and practice and in doing so would equip learners with the knowledge and skills to understand, administer, and enforce the various licences, permits and authorisations, while addressing unlicensed and therefore illicit activities too. The role of a licensing officer is multi-faceted, requiring detailed knowledge of the law, regulations, guidance and case law over an enormously varied range of regulated activities.

The RCO in our view simply does not fulfil the brief.

Unfortunately, it was clear from the outset in our meeting with the Institute for Apprenticeships that they were strongly pushing us in the direction of the Regulatory Compliance Officer Apprenticeship. This was confirmed at the end of September when we received the final decision from the Institute for Apprenticeships, which was not to pursue the proposed development of a Local Authority Licensing Officer Apprenticeship. The response stated:

“This is because we are satisfied the occupation you have described is already represented in the level 4 Regulatory Compliance Officer (ST0430).”

What’s next for the Local Authority Licensing Officer Apprenticeship?

This is a very disappointing decision. We felt our case for a specific apprenticeship was clear and underpinned by strong evidence.

There is no appeal process but we remain firmly of the view that a specific Licensing Officer Apprenticeship is what is needed. The Institute for Apprenticeships has confirmed its intention to review the RCO apprenticeship and invited us to join the review group noting:

“Our recommendation is that you work with the group to revise the L4 Regulatory Compliance Officer so that it can meet your needs. If, in revision, the group agrees that the licensing officer cannot be covered, we can review a fresh enquiry with evidence of why the L4 is not appropriate. “This is not novel many employers have been asked to come together in this way. It usually results in changes to products that make them applicable to a wider range of occupational roles or even with groups coming to agreements about why separate products may be needed.”

There are therefore still options available to the IoL and licensing authorities and the door has not completely shut on the possibility of eventually developing a specific Occupational Standard for a Licensing Officer Apprenticeship.

Finally, the Regulatory Compliance Officer Apprenticeship review will be employer lead. It is not yet clear what the membership of the review group would look like but it would appear there may be strength in numbers. Should opportunities arise for a wider licensing representation on the review group, please let me or the IoL know if you are interested in joining such a group.

Louis Krog
Head of Public Protection at Cheltenham Borough Council
Louis.krog@cheltenham.gov.uk

Unlocking the power of licensing to address modern slavery in the UK



By Gabriella Jiménez, Communications Manager at Shiva Foundation

Modern slavery is when an individual is tricked, coerced or forced into exploitation by others, for personal or commercial gain. It is an issue that knows no geographical boundaries, taking place across the globe, including our local communities. Remarkably, the number of individuals identified as victims of modern slavery in the UK has continued to rise year after year, with over 16,000 people referred to the authorities in 2022 alone. However, this number represents only the tip of the iceberg, with experts estimating the true number of victims to be as high as 100,000. There are various forms of modern slavery, including domestic servitude and labour, sexual and criminal exploitation, and it is important to note that victims of modern slavery and human trafficking are men, women and children of all ages, ethnicities and nationalities.

Responses to modern slavery

The Modern Slavery Act 2015 led to significant improvements in the national and local response to tackling modern slavery, including an increase in the number of people affected by modern slavery and perpetrators being identified. Moreover, high-profile cases such as the recent allegations of labour exploitation in a care home in Wales and Leicester's garment factories, have indeed brought attention to this critical issue. However, it's important to recognise significant barriers persist and there is a pressing need to address underreporting and improve enforcement.

Fortunately, the broadening scope of licensing provides a promising pathway to confront this pervasive issue.

The untapped resource of licensing officers and existing frameworks at the local level presents an opportunity to integrate modern slavery prevention efforts into everyday practices and routine procedures. However, to achieve this, it is imperative that both national and local authorities work collaboratively.

The intersection of licensing and modern slavery

Statistics show the most reported form of exploitation in the UK in 2022 was labour exploitation, which accounted for 30% of all referrals. This refers to situations where people are coerced to work for little or no pay, often under the threat of punishment. In the UK, victims have been forced to work against their will on a variety of locations, such as farms and building sites, factories, restaurants, nail bars, car washes, brothels and massage parlours. Considering there are approximately 1.4 million private sector businesses, the need to further support the efforts of enforcement agencies, like the Gangmaster and Labour Abuse Authority (GLAA), to investigate labour market offences is clear.

With this in mind, Shiva Foundation is proud to announce the launch of our innovative report, 'Understanding the Potential of Licensing Frameworks and Teams to Tackle Modern Slavery in the UK', for Anti-Slavery Day 2023. The report makes recommendations for strengthening statutory guidance and explores the opportunities for licensing authorities and practitioners to utilise tools at their disposal to enhance local anti-modern slavery responses. The report identifies key principles for leveraging existing frameworks, which are already used by licensing and enforcement teams across the 333 local authorities in England, to



embed anti-modern slavery responses and to provide practical solutions and recommendations for enhancing anti-modern slavery provisions across licensed sectors.

While additional capacity is needed, the strength of these recommendations lies in their utilisation of existing channels and tools (such as communications, guidance, visits, inspections, audits, and sanctions) to engage with businesses and promote compliance. There have been successful initiatives aimed at reducing anti-social behaviour and alcohol-fuelled crime in the nighttime economy, which have led to a growing momentum to expand efforts in preventing modern slavery, championed by bodies such as the Independent Anti-Slavery Commissioner and the Local Government Association. We

aim to further enhance and build upon these positive strides through this report.

Recommendations for local government

Modern slavery can be identified across several council areas including, but not limited to, licensing, environmental health and trading standards, housing, procurement, community safety and social services. The report provides recommendations for utilising local licensing infrastructure and integrating modern slavery content to increase awareness of the issue and make expectations on local businesses known. Some of these include incorporating modern slavery provisions in licensing policy, raising awareness during consultations, adding related questions to inspection forms, and integrating licensing into their modern slavery statement. These measures outlined in this section hold the potential to establish a proactive and robust approach to preventing and combatting modern slavery at the local level.

Lobbying national government

Robust and up-to-date national policy and guidance on modern slavery is essential to ensuring that statutory and non-statutory stakeholders have sufficient tools to proactively prevent and tackle modern slavery in the UK. Therefore, in tandem with the recommendations for local government, the report also makes a series of recommendations for national government to spearhead a modern slavery response through amending relevant legislation and statutory guidance.

Using The Licensing Act 2003 as a case study, some of the recommendations include the integration of modern slavery provisions into the standard licensing application process and the revision of the Section 182 Guidance, which accompanies the Licensing Act 2003. These revisions would involve adding modern slavery and human trafficking to the list of serious crimes while emphasising that preventing modern slavery is a valid consideration under the 'prevention of crime and disorder' licensing objective.

To facilitate the necessary changes, we are committed to advocating for national government to implement these recommendations.

Engaging with licensing officers

As the interface between policy and practical implementation, the third section of the report offers actionable guidance for licensing officers to effectively tackle modern slavery in their daily operations. It emphasises the significance of capacity building, raising awareness among license holders, and fostering collaborative partnerships within law enforcement. Implementing these measures will equip practitioners to proactively identify and address instances of modern slavery, deter potential perpetrators, and safeguard the well-being of those vulnerable to exploitation. During the creation of the report we interviewed several licensing officers and have since hosted a three-part webinar series focused on the three key themes mentioned. We plan to continue our engagement with this important group, working with them to incorporate these changes into daily activities.

In conclusion, modern slavery remains an urgent and pervasive issue, but we can make substantial progress in preventing, identifying, and addressing it by utilising the untapped potential of licensing frameworks and teams. The recommendations from our recent report span local government, national policy, and practical implementation, offering a holistic approach to doing so. If national government guides these changes, it will better equip licensing authorities to address the issue locally. With committed engagement and collaborative efforts, we can leverage the power of licensing authorities and enforcement teams to create safer communities. More modern slavery cases will be identified, those affected will be able to access support, and traffickers will be brought to justice.

If you would like to learn more, access the report here or contact us at info@shivafoundation.org.uk.

Canaware –companies that care are.

The rising number of medicinal cannabis patients in the UK.



By Kirsty Morrison, *Cancard*

This year marks 5 years since the government made cannabis legally available for medicinal use within the UK in 2018..

Since then, there have been over 80,000 prescriptions issued to patients through private clinics, while reports suggest that almost 30 million people could be eligible for cannabis prescriptions.

There is a general lack of awareness and sensitivity to these patients at present, probably due to this being a relatively new situation for venues and premises in the UK. With the rapidly growing number of patients affected, it is important to raise awareness and make medicinal cannabis use more visible and acceptable to avoid discrimination.

What are patients using?

Cannabis based medicinal products (CBMPs) are prescribed to combat a variety of common symptoms of diseases and ailments including chronic pain, Parkinson's, Multiple sclerosis (MS), depression, epilepsy and Attention deficit hyperactivity disorder (ADHD) and many more. These chronic conditions affect a significant number of people in the UK, with major impacts on their quality of life.

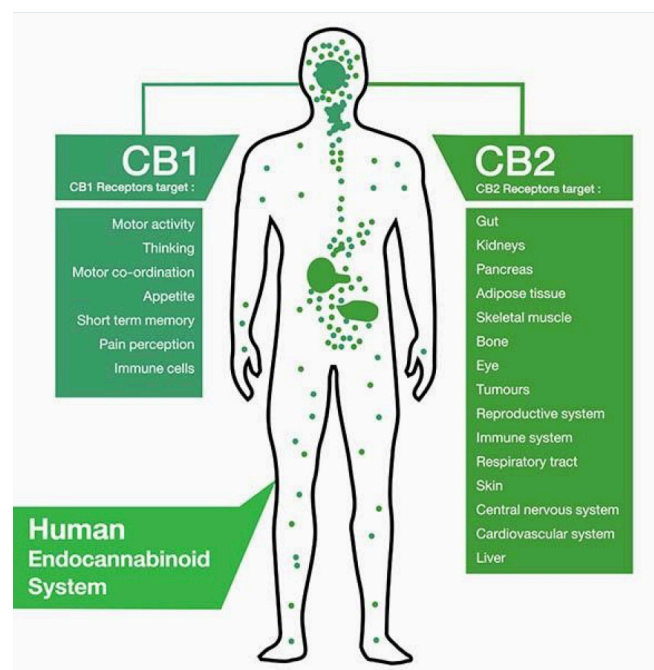
CBMPs can be prescribed in the form of bud/flower - the flowering part of the cannabis plant, is ground by the patient and placed inside the heated chamber of an inhaler and vapourised. Patients may also be prescribed oil, which is consumed orally in a dropper bottle, as well as tablets. However, the vast majority of patients are accessing flower over oils or tablets.

Current frameworks and guidance prevent GPs prescribing medicinal cannabis as funding is unavailable on the NHS in most cases. This means people eligible for prescriptions have to go through specialist clinics purchasing private prescriptions.

It can cost hundreds of pounds a month - and in some cases more to obtain a prescription for cannabis.

Why are people using cannabis for their health?

Cannabis medicines work for a huge variety of conditions because every human creates their own cannabinoids (the compounds in cannabis) and the body has receptors to receive them. That's right - as you are reading this your body is literally making your own cannabinoids. These receptors are present in every organ and internal system in our bodies. This is known as the Endocannabinoid system - it creates and processes our own natural cannabinoids every second of the day.





The endocannabinoid system (ECS) is responsible for 'maintaining homeostasis' in our body, which is another way of saying it is involved in almost every aspect of our daily functioning as humans such as sleeping, eating, emotional processing, pain control and immune responses. It is the thing that keeps our bodies in balance.

For many conditions cannabis supplements this system. This can be helpful where there is a deficit - much like you would take a B vitamin if you were deficient. It can also be helpful to have more cannabinoids to hand in order to perform a balancing function - such as reducing inflammation, fighting off unwanted cells or calming an overactive mechanism that can cause nerve pain or epilepsy.

There are many common conditions which produce symptoms that could benefit from cannabis and patients will often find that it can replace many common pharmaceutical drugs. It is a popular choice for people who have experienced side effects from synthetic drugs as the side-effect profile of cannabis is significantly lower than many other standard treatments.

Cannabis is also prescribed for conditions which can be life limiting, such as MS, cancer, PTSD and many others. Almost every single person in the UK knows somebody who could potentially benefit from cannabis based medical products.

Why is this important for venues?

A whopping 1.8 million people in the UK are already using cannabis medicinally and the numbers of prescription patients are scaling rapidly with awareness increasing around how to access it.

A 2019 poll commissioned by the Conservative Drug Policy Reform Group indicated that 77% of respondents agreed that medicinal cannabis use should be permitted.

Due to historical stigma around cannabis; patients can face discrimination in many areas of their lives, including when visiting hospitality and entertainment facilities.

When patients with disabilities or life-altering conditions go out to visit their local pub or go to a show at a theatre; it can be a big source of stress and worry that they may need to use their inhaler to treat an oncoming seizure or a significant symptom. The main concern is around someone smelling their medication in their bag, for example, and misunderstanding them.

Patients have been denied access to venues, faced questioning and threats of police involvement, many have had their medicine confiscated and much worse. Discriminatory policies or just lack of awareness could, and has, inadvertently meant that someone who is using a medicine is excluded from events and is forced to go home rather than being able to enjoy time with friends and family. Being able to be in the world and attend events is a huge part of maintaining a good quality of life - especially for disabled people who are at greater risk of isolation. It is essential that patients required to carry emergency medicine are catered for, just as many places would provide a disabled toilet or an access ramp to be more accessible.

Is there a way of identifying these patients over recreational users?

CanCard is the UK's Medicinal Cannabis ID verification scheme.

Set up with direction from policing organisations and doctors, CanCard aims to support prescription medicinal cannabis patients, and also those who cannot afford to buy their medicine privately but legally qualify for a prescription.

CanCard provides ID cards, recognised by the police, which

identify the holder as using cannabis medicinally (to alleviate symptoms of a serious medical condition). Cancard also works in an advocacy role, campaigning on behalf of patients within parliamentary and industry groups, and as a support network that covers the whole of the UK.

The police and other third parties utilise the Cancard initiative to identify those with genuine medicinal need for cannabis medicines, helping them to make decisions which take into consideration a patient's needs. A quick scan of the patient's unique QR code will confirm to the officer that the person is a verified Cancard holder. Venues where staff have mobile phones can scan a card to be certain that they are registered and legitimate.

Working in collaboration with trade organisations and relevant bodies across the UK, Cancard has produced information for venues, licenced establishments and public facilities, to help raise awareness of medicinal cannabis patients, and increase sensitivity in their establishments towards this set of customer's requirements.

Being aware of disabilities and the ever-changing landscape of healthcare is really important for businesses, not only to maintain a good standing in the community and to avoid accusations of discrimination, but also to ensure that a service is delivered with compassion and care.

We care! What is Canaware?

Well trained staff could make a situation much kinder and

more inclusive for patients who need to carry cannabinoid medicines - this creates a more welcoming environment which sets them apart from other venues.

Cancard provides information, support and training for businesses across the UK, in many sectors. This helps ensure organisations create a welcoming and friendly environment for all.

Once training has been received, venues can be certified as 'Canaware' and will be issued with a window sticker to display. Venues will also be promoted on a map that will be distributed and made available to the 85,000 Cancard members - this number is rapidly growing. This helps people feel confident that they can attend a premises without fear of confrontation.

Are there rules and regulations around what they can and can't do?

Not to worry, there is no fear of an Amsterdam scenario being created in a venue! We are in no way suggesting that patients can or should smoke cannabis on or anywhere near licensed premises, in fact - there is no smoke involved at all!

Cancard members follow a strict code of conduct that ensures that other customers are not affected by the requirement for an individual to carry or consume their medication.

If a patient requires the use of their inhaler, a venue can



designate an area or request that the patient leaves the premises to do so if there are concerns around smell.

Side note: cannabis inhalers are nothing like the huge whopping clouds of vapour that come from e-cigarettes. The vapour produced is similar to boiling a kettle, there is an aroma, but it dissipates in seconds and is not considered a risk for passive inhalation like smoking. Most venues consider a smoking area a suitable place to medicate, others have an alternative area that they consider appropriate.

Cancard Code of Conduct ;

A medical inhaler should be used when taking your medicine. Smoking is not permitted.

Be prepared, on request, to show your card

Consume your medication in appropriate or designated areas.

Don't leave your medication unattended. Keep it on your person in a safe place.

Everyone has the right to enjoy their experience. Be mindful of other members of the public.

Fire Alarms in buildings can be sensitive to vapour. Please be careful where you are consuming your medicine. e

The training simply requires all of your staff members to digest some information digitally and confirm that you have understood the contents via email. It would be handy at this point to give any additional information you would like us to share with patients. You will then be added to our map and sent your window sticker.

You can arrange for the materials to be sent by emailing kirsty@cancard.co.uk.

'I'm very happy to be aware of Cancard as the British Tea Museum. I am very pro this sort of legislation. I was thrilled as someone in hospitality who is now mindful of people who use cannabis medicinally, to help their illness. It means now if someone has been vaping on the way to my shop and there is an odour, my staff now know what that could be and I am thrilled to embrace them as customers'

- Becky - Owner, British Tea Museum

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Licensing of unlicensed boxing events (white collar boxing)



By Avoen Perryman, Head of Operation, England Boxing

Background

The sport of boxing has 4,000+ years of history, dating back to its origins in Egypt and Greece where it was one of the original sports to be competed at the ancient Olympics.

But after centuries of drifting into obscurity after the rule of the Romans, it wasn't until 17th Century England that the sport of boxing – or pugilism and prize fighting as it was more commonly known – began a resurgence in popularity.

Huge crowds from all social classes mixed and came together to watch the best fighters in the country clash, with Royalty brushing shoulders alongside politicians, bankers, carpenters, paupers and hawkers alike, all for the love of the sport. Collectively, these gatherings of supporters were referred to as the fancy.

Between 1780 & 1820, prize fighting was well renowned as the sport of Great Britain – surpassing all other sporting activities of the time.

Throughout the early-mid 18th century, there were no codified rules governing the sport. As such, fights were brutal and violent, with single rounds potentially lasting hours.

Unsurprisingly, injuries and deaths were relatively common at this time, and it wasn't until then English Champion – Jack Broughton – decided to introduce a set of rules to govern the sport and be spread throughout the fancy, that all competitions from 1743 onwards should be contested under 'Broughton's Rules'.

He set about writing and introducing these rules shortly after unintentionally killing his opponent – George Stevenson – in the ring two years prior. The guilt and burden he carried for the rest of his life ensured that rules were introduced whereby:

coaches / seconds were required to support boxers; timed knock-downs would take place to limit the duration of fights; appointed judges would oversee proceedings; and a limit to the extent of violence permitted would be enforced by those present.

For almost 100 years these rules were followed, until the tide of public opinion began to veer away from the sport in the early 19th century. With the formation of the police in 1829 under Sir Robert Peel, the regularity of riots, gambling, pickpocketing and the occasional death still taking place at prize fighting events meant that support from the middle and upper classes began to dwindle, and the sport was largely left for the working class to persevere with.

Between that time and 1865, the sport, largely remained an open secret in the shadows of society. Despite the introduction of the London Prize Ring Rules in 1853 which sought to include a constructed boxing ring, timed rounds, and several other rules we would still recognise in the sport today, fights during this time period were organised behind closed doors or in rural isolation, away from the prying eyes of the Peelers (police).

That is until the Marquess of Queensbury, John Sholto Douglas – a member of the fancy, British nobleman and brief serving member in the House of Lords – began to advocate and help to codify its governance in the eyes of the establishment. He commissioned Robert Chambers to write the Queensbury rules in 1865, which were later published in 1867.

These rules went much further than those before, with the introduction of boxing gloves; shorter timed rounds; and the abolition of wrestling or other forms of violence which had been commonplace up until that time.

In 1880, after the Queensbury rules had become widespread



knowledge and recognised by the police, government, and the courts as being the accepted code of conduct for the provision of boxing in England, key figureheads from within the fancy then went on to form the 'Amateur Boxing Association' (ABA).

Later, in the 1920's a clear distinction was made between amateur boxing (i.e. that governed by the ABA, participated in for the love and fun of the sport) and professional boxing (i.e. that governed by the British Boxing Board of Control – BBBoc, participated in for an income and livelihood at an elite level), that was also recognised by the police, government and courts, and continues to be so this day. Though the ABA – and later the ABA of England (ABAE) – has since changed its name to 'England Boxing' and splintered off over the years to counterparts in 'Boxing Scotland', 'Boxing NI' and 'Welsh Boxing', these organisations remain as the recognised governing bodies for amateur boxing in the UK.

These two avenues – professional & amateur – within the recognised and accepted sport of boxing has provided a safe and regulated sport for participants and the public to enjoy, with over 140 years of development experience to draw from.

The most up-to-date support and guidance for governance, safety, medical practices, safeguarding, membership, rules, policies, equity & inclusion, and many other important sources of information that is required to run a modern sport is available to these governing bodies from the Sports Councils of Great Britain (namely, Sport England, Sport Wales, Sport Scotland and UK Sport) as recognised and overseen by the Department for Culture, Media and Sport (DCMS) in government.

But there is a world that sits outside of this sphere of governance. As a broad catch-all, the term 'unlicensed boxing' encompasses everything on a wide spectrum from organised bare-knuckle competitions that take place in a field

and are occasionally broadcast over YouTube, to the glitz and show lights of 'charity boxing events' that are held by organisers such as 'Ultra White-Collar Boxing'.

Everything from the seemingly well-run to the seemingly barbarous exists in this realm, and despite their recognised status as the governing bodies of boxing in this country, neither England Boxing or the BBBoc has the power to regulate or intervene.

But why is this an issue? Many readers will know that unlicensed boxing has existed in various forms for decades. It has been televised, raised millions of pounds for charity, helped to get people physically active and brought individuals together, so why should we worry?

In March 2023, student Jubal Reji Kurian died after being seriously injured in a charity boxing match organised by Ultra White Collar Boxing.

In April 2022, Dominic Chapman died shortly after competing in an Ultra White Collar Boxing event in Droitwich.

Adam Smith suffered two strokes and nearly died after competing at an Ultra White Collar Boxing event in 2018.

On November 18th 2017, a crowd disturbance at an Ultra White Collar Boxing event in Weston Super-Mare led to two people being taken to hospital and police being called to attend.

These deaths, crowd disturbances and near-misses are just some of the sad cases that exemplify how badly things can go wrong when unlicensed boxing events are allowed to take place outside of the guidance and support readily available to the recognised governing bodies of the sport.

That is not to say that similar incidents do not take place within

the world of amateur and professional boxing, because they do. But the frequency, ferocity and potential impact is dwarfed by those that occur in unlicensed boxing events.

There has been one tragic death in England Boxing in the last 35 years, that of amateur boxer Ed Bilbey in 2017. When compared to the two deaths that have taken place in the last 18 months under 'Ultra White Collar Boxing' alone (i.e. just one unlicensed boxing event organiser amongst many), it is clear to see a disturbing pattern.

Further to this, the sad truth is that the findings of the independent enquiry into the death of Ed Bilbey identified that the unregulated underbelly of the sport is at least partly to blame for this tragedy.

Bilbey's coach was found to be unqualified in the amateur arm of the sport, and was therefore not trained in the safeguarding & protection of children or safe practices for losing weight in preparation for a bout when training minors. They had also avoided the need to complete an enhanced DBS check and first aid training, all of which are essential pre-requisites to becoming a qualified amateur boxing coach.

As a result, the training regime that was dictated to Ed Bilbey in the lead-up to his death exacerbated an underlying undiagnosed heart condition, pushing him into unnecessarily intense physical training and rapid weight loss by dehydration, ultimately leading to his death.

The coach was found to have been actively promoting & presenting his club as registered and affiliated with England Boxing, though in reality, the amateur club and its volunteers existed in name only.

The club acted as a front for them to generate an income from training children in amateur boxing, whilst avoiding the necessary safety procedures, training, DBS clearances, and other measures required to safeguard participant's wellbeing.

Upon publication of the independent enquiry on September 1st of this year – the 'Charles Thomas Report', conducted by Sport Resolutions – the BBBoc have since banned Bilbey's coach from the professional arm of the sport. Whilst this news is very welcome, make no mistake, it should be of little comfort to the public when it comes to unlicensed boxing.

Under current licensing legislation and guidance, Ed Bilbey's former coach – and any other person throughout the country, regardless of their background, experience or knowledge of boxing for that matter – would still be able to organise and run an unregulated / unlicensed boxing event anywhere in the country, with or without children taking part, and there would be very little anyone could do to stop them.

Whilst England Boxing is rightly being held to account on its shortcomings that played into the tragic death of Ed Bilbey, it is only possible for the governing body to enact and enforce bans or punishments within its membership. Outside of that, England Boxing – and all other amateur boxing governing bodies in the UK – has no authority to ensure that unlicensed or unregulated boxing activities are conducted safely by trained and experienced individuals.

As a governing body with identifiable representatives, members, directors, governance and powers that enable us to be able to effectively update, develop and change our sport in ways that will protect our participants. We can ban coaches from our sport and inform other recognised amateur and professional boxing governing bodies of our actions to limit their movements, but there's little else that can be done to stop them from operating in the unlicensed realm.

The Foundation of Unlicensed Boxing

How and why did we get to this predicament? What is it about the sport of boxing that means unregulated or unlicensed boxing is permitted to take place outside of the amateur or professional governing bodies that are recognised by the UK Sports Councils?

In 1880, a consensus was established between the government, courts and police that regulated boxing activities which took place within the confines of the Queensbury rules were recognised as the socially acceptable sport of boxing, and these rules were the key distinguishing factors that separated it from that of the socially unacceptable activity of illegal bare-knuckle boxing.

Despite this consensus, some die-hard members of the fancy and the travelling community sought to continue the activity of bare-knuckle boxing, either as a means of entertainment or dispute resolution amongst feuding families. The activity was driven underground, held in secret, and distinguished as being an illegal sport.

As such, between 1880 and 1975, there were many cases of the police and courts intervening to prevent and break-up bare-knuckle boxing events, helping to solidify the distinction between the legal and illegal.

But the tide of change can largely be traced back to the year of 1975 when an unlicensed boxing event was organised to take place between the infamous Roy "Pretty Boy" Shaw and Don "The Bull" Adams.

Roy Shaw had been competing in bare-knuckle boxing events for several years at this time after having had his license revoked by the BBBoc as a professional boxer for receiving convictions as an armed robber. These underground events had grown in popularity in the early 70's, drawing bigger and bigger crowds as years went by and individual fighters – like Shaw – developed an infamous reputation and sub-cultural following.

Shaw and Adams had become well-known amongst fans and had arranged to fight one another in a bare-knuckle contest as a charitable fundraiser. However, local police had gotten wind of the event and warned both parties to not let it take place under threat of intervention and criminal convictions being pursued thereafter.

Frustrated with the circumstances, Shaw and Adams sought legal advice to see if there was some way in which the courts could allow them to box one another and raise money for their charitable cause.

It was determined that the fight could go ahead, provided that it was delivered in a way that reflected the Queensbury

rules, specifically: with both fighters wearing boxing gloves; there being timed rounds; and the fight being held in a safely constructed ring. All other standard licensing requirements at the time were also required to be adhered to.

This paved the way for unlicensed boxing to flourish in the UK, with events growing in number and popularity throughout the 80's & 90's, and word spreading that this newly found grey area could enable event organisers to hold boxing shows without having to adhere to the strict governance code or rules prescribed by the ABAE and BBBoC.

Make no mistake, you've only got to look on Youtube to see that unlicensed boxing events at this time were brutal with few rules or safety provisions. Fighters would wrestle, bite, headbutt, gouge, and hit opponents when they were down.

Without a governing body to oversee fair-play, or to enforce bans, sanctions and punishments for such behaviour, unlicensed fighters & organisers could behave as they pleased without fear of repercussions.

The Growth of White-Collar Boxing

At this time, across the pond in the USA, amateur boxing coaches in New York a short walk away from Wall Street began noticing a growing number of white-collar business men entering the gym looking for a lunchtime fitness session to hit the bags and work up a sweat.

As time went by, more and more of these white-collar workers enquired about stepping foot in the ring to compete in an organised boxing event. From that point onwards, boxing clubs throughout the city began organising 'White Collar Boxing' events, where businessmen could compete under the licensing and rules of amateur boxing in the USA. This opened the door to a new clientele and fan-base than compared to the working class 'Blue Collar' backgrounds that boxers traditionally tended to come from.

Representatives from one company would be equally matched and paired with experienced, well trained, and healthy boxers from another company across the city. Amateur boxing rules were a must and if participants couldn't be safely matched, they wouldn't compete. As such, there were no recorded instances of death or serious injury having occurred at these events as they took place throughout its heyday in the 80's & 90's.

News spread to the UK, and whilst support for unlicensed boxing in its raw, original and brutal form had faltered by the early 2000's, event organisers began to recognise the appeal of this new, polished, and more professional type of contest taking place and drawing a crowd.

Top Risks Involved

Recognising the appeal for general 'have-a-go' participants with no previous experience in boxing willingly queuing up to take part in events throughout the country, organisers saw the opportunity to produce competitions in quick succession by advertising that competitors only need to train once a

week for 8 weeks before stepping foot in the ring. In many cases, participants don't actually have to attend for the full 8 weeks, they can compete without ever having trained at all if so desired.

The risk of this practice is hard to put into words to a reader who has not actively trained or competed in the sport of boxing before. As a general rule, boxers at amateur level will rarely be allowed to compete until they have trained consistently (i.e. at least 2-3 times p/week, with running and conditioning training sessions on top) for at least 6 months, and shown in that time that they are capable of defending themselves. If they're not ready, they don't compete.

As an analogy, a general member of the public could probably install a new roof on their house by watching Youtube videos and doing their best DIY attempt. But the chances are that it will have issues. It will likely be a bit leaky, the tiles won't be quite straight, it will probably not meet building regs and will take a lot longer to complete. It's very likely that the roof could actually be downright dangerous, both during construction and upon completion.

Boxing is a skill and a sport that takes years to master – it's no different to any other trade or profession. The expectation therefore that participants would be safe to compete after just 8 weeks – or fewer – of training is worrying at best.

There is also the concern of participants being matched with experienced and well-trained former amateur or professional boxers. Amateur and professional boxers are often approached by unlicensed boxing promoters with the promise of £50 to compete at an event with short notice against an unknown opponent who has little to no experience.

This is the equivalent of – using the analogy above – asking a skilled and trained roofer to put up a roof faster than an untrained DIYer...it doesn't take roofer to guess who is going to win. The only difference being that the two people in question here are being pitted against each other in a risk-to-life sport where people can and do get hurt.

Even when opponents are matched according to experience, there are many examples of event organisers matching opponents with an unfair advantage in weight.

In amateur boxing, competitors must be within the same weight range and are unable to lose more than a negligible amount of weight during the weigh-in period before a competition (normally 300 – 700 grams depending on the age and weight of the boxer).

In unlicensed boxing events, competitors are rarely matched according to weight, but instead, a general assessment of their rough height, size and figure is used to determine a fairly matched contest. This presents a huge disadvantage and safety risk to the lighter opponent that – again – can result in a serious risk of injury or death.

There are also serious risks associated with medical safety at many unlicensed boxing events.

In licensed amateur boxing events, there must be a qualified and insured Doctor at ringside with in-date General Medical Council (GMC) registration. Local A&E departments have to

be informed of the event prior to it taking place. Paramedics are also often available within the field of play. Further to this, oxygen and a defibrillator must be available at ringside. The boxing officials on-site and supervisor in charge will be trained in the use of an Emergency Action Plan to ensure that safety processes are followed if someone is knocked unconscious or collapses in the ring. All boxers have to undertake an annual medical assessment with a qualified doctor that is recorded in their individual BCR1 (medical & competition record book), and prior to every bout they will receive a shorter general medical assessment from the ringside doctor – and these are just the headlines of what is prescribed to ensure medical safety in the sport. If any of these are missing or skipped, the event or bout does not take place.

In unlicensed boxing, event organisers decide for themselves what safety measures they want to have in-place. Sometimes a doctor will be at ringside, sometimes there will only be a first aider. Medical assessments might be conducted by a Doctor prior to an event, or athletes might just be told to see their GP and sign a disclaimer that they are fit and healthy to compete. Due to there being no governing body, boxer's medical records are not documented or checked, leaving the opportunity wide open for competitors who have failed a medical at one event to just jump over to another unlicensed promoter with less strict assessments and choose to compete there instead to their own risk.

For those unlicensed boxers who choose to compete at multiple events and get a taste for the sport, they often will opt to then join an amateur boxing club and take part in licensed events, trying their best to become a Championship boxer or even make their way to the Olympics.

Whilst this is a welcome and admirable venture, it does present a problem for the safety of existing amateur boxers. Where an unlicensed boxer has competed for several years, they will have accumulated a degree of competency and experience in the sport. But without a medical or competition record (a BCR1) that is documented and overseen by a National Governing Body (NGB), it can be impossible to safely assess how many bouts an unlicensed boxer has had in the past.

Therefore, an unlicensed boxer may have had 5 or 10 bouts prior to joining England Boxing but could dishonestly state that they have never boxed before and subsequently be matched with another boxer who has 0 bouts on their record, giving them a serious advantage and putting the other boxer in great danger.

Whilst there are systems in place to try and mitigate these risks, they are never going to be full proof whilst unlicensed boxing exists in its current form.

The solution

It should be noted that there are some very well-run unlicensed boxing events taking place throughout the UK that very closely reflect the rules of amateur and professional

boxing. But there are far more unlicensed event organisers out there who knowingly or unknowingly create the risks outlined above and others – risks that ultimately can and do cost people their lives.

These risks also cause problems within the amateur and professional realms of the sport, both in safety and reputation. The average member of the public won't know the difference between Ultra White Collar Boxing and England Boxing, so when there is a death or riot at an unlicensed boxing event, it will impact on the overall perception of the sport when this reaches the press.

It is true to state that on every occasion that there has been a death, serious injury or crowd disturbance at an unlicensed boxing event that has reached the press, England Boxing has received a communication from the media asking for a comment.

Our comment now is simple – we appeal for the Home Secretary to update the Licensing Act and its accompanying guidance to state that any and all boxing events are to be licensed by the National Governing Bodies of amateur and professional boxing that are recognised by the UK Sports Councils and DCMS.

As door staff at licensed venues are required to have a valid and in-date SIA license, we see there being no reason why boxing events and their organisers should not be licensed by recognised NGB's. Without such intervention, it is our honest opinion that more people will be at risk of public disturbance, serious injury or death.

In recent years, one critical distinction – namely, the wearing of boxing gloves – has even been removed and deemed to be acceptable by fight fans across the country, as PPV televised events of bare-knuckle boxing are being broadcast through online channels such as 'Bein Sports', at reputable and credible venues such as Indigo at the O2 arena in London. As a parting thought, how many more safety precautions, rules or guidelines have to be stripped away from combat sports as a whole before we look back and find ourselves in 1820 once again?



UNDER 25?

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This resource and others have been developed by the Retail of Alcohol Standards Group. There is a suite of poster, shelf slider and badge designs with the Challenge 25 branding freely available for use and include versions for use in Wales and Scotland.

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In Memory...

No one is ever really lost to us as long as we remember them.



David Chambers

David started a lifetime career in licensing soon after joining the former London County Council in 1959, dealing initially with petroleum licensing before being promoted to Deputy Head of Entertainment Licensing in 1974 by the Greater London Council (successor to London County Council). He moved to Westminster Council in 1985 where he remained until 2000, when he took early retirement and set up his own consultancy and training company.

David was one of the earliest members of the Society of Entertainment Licensing Practitioners. He was instrumental in the discussions which led to the SELP merger with the IoL in 2005, when he became a Director of the IoL. David later stepped into a non-director position, remaining as a valued advisor to the Board until 2022.

David worked with the IoL London Region Executive Committee acting as Returning Officer for AGM's, in addition to providing his invaluable support and advice throughout.

In every capacity, David was a steady influence with a measured response. He was our 'go to' in the event of queries around the regional constitution, memorandum and articles, AGM procedures and other governance queries. He taught us a huge amount, was always incredibly helpful, thoughtful and supportive, and just a wonderful person.

David described his work with the IoL as a 'real privilege', but in truth the privilege was ours. He will always be fondly remembered by everyone who had the pleasure of knowing or working with him.





Sandra Coombes

Sandra worked for the authority for a very long time in the highly specialist role covering Animal Health & Welfare and Animal Licensing. Sandra will be greatly missed by her colleagues, peers and all those who knew her.

Sandra worked for Bury since 14 March 1994 and during the last 29 and more years, Sandra has, almost singlehandedly, led all work in the complex field of animal health and welfare including dealing with many major challenges but most noteworthy the foot and mouth outbreak, illegal puppy farms and most recently avian influenza. Sandra saw many changes within the council and always dealt with the challenges and tribulations of animal health and welfare and the ever-changing priorities and instructions from government agencies, farmers, and animal licence holders. Sandra was held in high esteem throughout Greater Manchester and was a font of technical knowledge and expertise.

Sandra loved all animals and had a particular passion for dogs, horses and horse jumping.

Sandra was fiercely independent, hardworking, and knowledgeable. Sandra was hugely influential within her specialist field of animal health. Sandra had several medical challenges in her life which she overcame and the courage and resilience she showed was inspiration to all who knew her.



Howard Bee

I had the great pleasure of working with Howard for several years when he was Licensing Manager at Hyndburn. He was a very kind and gentle man, with a huge love for his wife and children. They were definitely the central things in his life and, quite rightly, his family came first for Howard.

Howard was a hard worker, taking his role and responsibilities as Licensing Manager very seriously and he was always keen to raise standards. He was liked and respected by his Team, and had the confidence of our elected members. He had a great manner with our local taxi trade, and apparently endless patience. We faced a couple of difficult periods in Licensing whilst Howard was in charge and he handled these with grace and good humour.

Howard was a very enthusiastic hiker who completed all "the Wainwrights" over the years. I recall him taking on a couple of mammoth 24 hour hikes to raise money for charity, including the Coast to Coast and he took his Team for an annual walk in the Lake District, which I think was much enjoyed. I think he found a lot of pleasure in the countryside and fresh air and I remember his delight at the prospect of leaving the North West to move to Bideford, North Devon, with his wife to start a new life the countryside (returning in 2021 when he became a grandfather).

When writing this one of Howard's colleagues in the Licensing Team pretty much summed it up when she said: "he was one of the most genuine guys I had the pleasure of working with".



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