



Cabinet Member for Policing and Equalities

Time and Date

9.00 am on Monday, 24th November, 2025

Place

Diamond Room 2 - Council House

Public Business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 6)
 - (a) To agree the minutes of the Cabinet Member (Policing and Equalities) meeting held on the 1st September 2025
 - (b) Matters arising
4. **Licensing Act 2003 – Review of Statement of Licensing Policy 2026 - 2031** (Pages 7 - 56)

Report of the Director of Law and Governance.
5. **Outstanding Issues**

There are no outstanding issues
6. **Any Other Business**

To consider any other items of business which the Cabinet Member decides to take as a matter of urgency because of the special circumstances involved.

Julie Newman, Director of Law and Governance, Council House, Coventry

Sunday, 16 November 2025

Note: The person to contact about the agenda and documents for this meeting is Lara Knight Email: lara.knight@coventry.gov.uk

Membership: Councillors P Akhtar (Deputy Cabinet Member), AS Khan (Cabinet Member), J Lepoidevin (Shadow Cabinet Member)

By invitation Councillor G Lloyd

Public Access

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Lara Knight

Email: lara.knight@coventry.gov.uk

Coventry City Council
Minutes of the Meeting of Cabinet Member for Policing and Equalities
held at 10.00 am on Monday, 1 September 2025

Present:

Members: Councillor A S Khan (Cabinet Member)
 Councillor P Akhtar (Deputy Cabinet Member)

Other Members: Councillor J Gardiner (By Invitation)

Employees (by Service Area):

Law and Governance F Cartwright, L Knight, A Veness

City Services and T Wetherhill
Commercial

Apologies: Councillor J Lepoidevin

Public Business

41. Declarations of Interest

There were no disclosable pecuniary interests.

42. Minutes

The minutes of the meetings held on the 10th April 2025 and the 28th July 2025 were agreed and signed as true records.

43. Petition e61-24/25 - Save the view of Lake View Park from Lake View Road

The Cabinet Member for Policing and Equalities considered a report of the Director of City Service and Commercial, which responded to a petition calling for the Council to consult with residents on Lake View Road on the location and number of trees to be planted on Lake View Park.

The petition contained 55 signatures and had been submitted by local residents who were asking for greater consultation on the planting of new trees that affect the view of Lake View Park from the properties that face the park.

The report indicated that the Park Services Team worked with the Urban Forestry Team to find the best location for the trees on this site and the open northern side of the park was considered the best option, because the trees would provide shading for a future path that was proposed and awaiting funding.

Due to resourcing problems, the Urban Forestry Team had overlooked the need to notify the local residents of this change. Residents in similar locations where trees were being planted had received notification in advance of the trees being planted.

The trees were being planted to help the Council achieve its goals as set out in the Urban Forestry Strategy. The main aim was to plant 360,000 trees to help fight the effects of climate change.

Councillor Gardiner spoke in support of the petition highlighting the following points:

- The lack of consultation was unacceptable, particularly considering other communities were consulted over similar changes, furthermore the lack of consultation was due to budget constraints, but this should not impede further consultation efforts.
- Previous works had left large mounds of dirt covered with weeds, this combined with the newly planted trees severely limited views of the park from houses on Lake View Road.
- The lack of visibility from houses meant an increase in crime and dog waste as residents were less able to monitor and report such incidents.
- The lack of visibility and changes to the park had removed the specific character and beauty of the park, resulting in some residents to drive to other nearby parks as a result.
- Residents would rather self-select methods of communication with the council instead of using the Lake View Trust.

Officers responded to clarify the following points:

- The lack of consultation was due to a genuine officer error during a period of staffing changes and not due to budget constraints and that, during the early stages of the installation process, there had been efforts to consult with local communities.
- It was not legally possible to remove the mounds of dirt offsite, however, the removal of weeds would significantly improve visibility across the park.
- Any increase in incidents of dog waste not being picked up should be reported to the Council so that dog enforcement patrols could be increased.
- An increase in reported crime at the park had not been identified. However, officers would consider the impact of any future developments at the park and make attempts to address perceived safety concerns.
- Efforts were being made to consult with local communities on future changes to the area. Currently the area was being moved from close mown lawns to mixed trees and rewilded flower areas, along with more traditional lawns and grass.

Concerns were also raised by Councillor Gardiner over the alleged increase in crime being caused by foreign born individuals. This perception was refuted by officers who stated there was no evidence of an increase in crime or that any crime was being committed by foreign born individuals, particularly as a consequence of the additional trees planted at Lake View Park.

RESOLVED that, the Cabinet Member for Policing and Equalities:

- 1. Notes the Petitioners' concerns.**
- 2. Approves the retention of the trees as they have been planted, noting that the council will manage the trees to maximise the future benefits that they can provide.**
- 3. Requests that officers improve the method of notification to ensure that all future planting projects are known to all residents in advance of planting works.**

44. Outstanding Issues

There were no outstanding issues.

45. Any Other Business

There were no other items of business.

(Meeting closed at 10.35 am)

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Public report Cabinet Member Report

Licensing and Regulatory Committee 2025	18 th November
Cabinet Member for Policing and Equalities 2025	24 th November
Full Council	2 nd December 2025

Name of Cabinet Member:

Cabinet Member for Policing and Equalities - Councillor AS Khan

Director Approving Submission of the report:

Director of Law and Governance

Ward(s) affected:

All

Title:

Licensing Act 2003 – Review of Statement of Licensing Policy 2026 - 2031

Is this a key decision?

No -

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant.

Executive Summary:

The purpose of this report is to update Members of the outcome of the eight-week consultation undertaken on the review of the Council's Statement of Licensing Policy for the Licensing Act 2003 and to recommend for approval, a revised policy for the period 2026 – 2031.

Recommendations:

Licensing and Regulatory Committee is recommended to:

1. Consider the results of the consultation, and the proposed changes on the revised Statement of Licensing Policy for the period 2026 – 2031 and notify the Cabinet Member for Policing & Equalities of its comments.

Cabinet Member for Policing and Equalities is recommended to:

1. Consider the results of the consultation, and the proposed changes on the revised Statement of Licensing Policy for the period 2026 – 2031 and any comments from the Licensing and Regulatory Committee.
2. Recommend to Council that it adopts the Statement of Licensing Policy attached as Appendix 1 to the report.

Council is recommended to:

1. Adopt the revised Statement of Licensing Policy attached as Appendix 1 to the report.

List of Appendices included:

Appendix 1 – Statement of Licensing Policy 2026 - 2031 (shaded paragraphs illustrate the amendments to the document).

Appendix 2 – Summary of consultation responses and changes to the policy.

Appendix 3 – Equalities Impact Assessment.

Other useful background papers:

Licensing Act 2003

Licensing Act 2003 Section 182 Guidance

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

Yes, meetings of the -

Cabinet Member for Policing & Equalities – 28th July 2025 & 24th November 2025

Licensing & Regulatory Committee – 5th August 2025 & 18th November 2025

Will this report go to Council?

Yes -

2nd December 2025

Report title: Licensing Act 2003 – Revised Statement of Licensing Policy

1. Context (or background)

- 1.1 The Licensing Act 2003 requires each Licensing Authority to prepare and publish a Statement of Licensing Policy. The policy sets out how the licensing authority intends to approach its licensing responsibilities and how it intends to promote the four licensing objectives.
- 1.2 The current Statement of Licensing Policy came into effect on 16th March 2021, to cover a period up to 16th March 2026.
- 1.3 This policy must be renewed every five years and be subject to a full consultation process.
- 1.4 At the meetings of Cabinet Member for Policing & Equalities on 28th July 2025 and Licensing and Regulatory Committee on 5th August 2025, a report was considered on the draft revised Statement of Licensing Policy and authorised the Director of Law and Governance was authorised to consult on its contents.
- 1.5 This report advises Members of the consultation that has taken place and outlines the comments received and amendments made to the Council's draft Licensing Policy.
- 1.6 There are no major changes to the policy except for some minor wording amendments. The general principles of the Statement of Licensing Policy remain the same and the document is still centered around the Licensing Act's four licensing objectives, namely:
 - Prevention of crime and disorder;
 - Promotion of public safety;
 - Prevention of public nuisance; and
 - Protection of children from harm
- 1.7 Following public consultation, the revised draft Statement of Licensing Policy is now ready to be recommended for adoption to take effect from 16th March 2026 (Appendix 1).

Key Changes to the Revised Licensing Policy

- 1.8 There are no proposed significant changes to the policy, only minor amendments and additions. These can be shown highlighted in yellow in the draft revised policy (Appendix 1).

2. Options considered and recommended proposal.

- 2.1 The Licensing and Regulatory Committee is recommended to:

Consider the results of the consultation on the revised Statement of Licensing Policy for the period 2026 – 2031 and notify the Cabinet Member for Policing and Equalities of its comments (Appendix 2).

- 2.2 The Cabinet Member for Policing and Equalities is recommended to:

1. Consider the results of the consultation of the revised Statement of Licensing Policy for the period 2026 – 2031 and any comments from the Licensing and Regulatory Committee.
2. Recommend to Council that it adopts the Statement of Licensing Policy for the period

2026 – 2031 attached as Appendix 1 to the report.

2.3 Council is recommended to:

1. Adopt the revised Statement of Licensing Policy 2026 – 2031 attached as Appendix 1 to the report.

3. Results of consultation undertaken

3.1 The public consultation ended on 7th October 2025 and included the following elements:

- Mail shots to representatives of the licensed trade, clubs and key partners;
- Formally writing to the Chief Officers of the responsible authorities;
- Mail shots to businesses and organisations; and
- Wider public consultation through the City Council Website.

3.2 All statutory consultees have received a letter with a link to the revised Statement of Licensing Policy 2026 – 2031 on the Council's website. The consultation was made available from 12th August 2025 – 7th October 2025. The link was sent to all licensed businesses, Responsible Authorities, businesses and organisations and other public consultees as set out in the policy inviting them to comment.

3.3 The changes to the Policy can be shown highlighted in the draft revised policy (Appendix 1) and are listed below:

- Paragraph 8.11 amended to include website links for drink spiking, violence against women & girls, serious youth violence & counter terrorism.
- Paragraphs 8.38 & 8.39 added to include considerations relating to child exploitation
- Paragraph 11.1 amended to include best practice schemes
- Section 16 added – Environmental best practice in Licensed Premises

3.4 Ten responses have been received to the consultation and this is summarised in Appendix 2. After considering the comments it is proposed that the following amendments be made, these are also highlighted in the draft revised policy (Appendix 1):

- Paragraph 1.12 – voluntary initiative for refraining from selling single unit alcohol cans in areas where street drinking is prevalent has been added;
- Paragraph 8.33 has been amended;
- Paragraph 8.39, has been amended to include **Coventry's Protocol for Addressing Adult Modern Slavery**
- Paragraph 13.6 has been amended to include Coventry City Council's Drug & Alcohol Strategy.

4. Timetable for implementing this decision.

4.1 The revised Statement of Licensing Policy must be published by 16th March 2026 allowing the Council to continue to carry out any function in respect of individual applications made under the authority of the Licensing Act 2003.

5. Comments from Director of Finance and Director of Law and Governance.

5.1 **Financial implications**

The financial implications associated with the recommendation are limited to the employee costs associated with undertaking the consultation exercise and any costs involved in

publishing the Statement of Licensing Policy. This will be managed within existing service budgets.

5.2 Legal implications

The Council will not be able to undertake its role as a Licensing Authority after the 16th March 2026 unless it has approved and published its revised Statement of Licensing Policy. The policy must be reviewed every five years, or more often if appropriate.

The licensing function is carried out by the Council's Licensing and Regulatory Committee and officers exercising delegated powers. The one exception is the approval of the policy, which must be approved by Full Council.

The Council is required to have regard to any current Government Guidance when carrying out any licensing functions under the Licensing Act 2003 including its Statement of Licensing Policy.

6. Other implications

6.1 How will this contribute to achievement of the One Coventry Plan?

The prevention of crime and disorder is at the centre of the licensing regime and there are strong structural links between the administration of the licensing process and the role of the Community Safety Partnership and West Midlands Police. The Licensing Policy acknowledges the **Coventry Community Safety Partnership Plan** and gives information about proposed enforcement protocols with the Police and other enforcement authorities. As a Responsible Authority, the Police have been a key consultee.

One of the licensing objectives is 'The Protection of Children from Harm'. Applicants are required to show how they will address this objective in their operating schedule when making applications. The Coventry Safeguarding Children Board is a Responsible Authority consulted when applications are made.

Although there is not a specific licensing objective related directly to health within the current legislation, Public Health is a Responsible Authority. Alcohol has been identified as a priority within Coventry's Health and Wellbeing Strategy. Public health related licence conditions will be used where practicable to reduce the impact of alcohol on public safety and other licensing objectives

This aligns with the One Coventry Plan to work together to improve our city and the lives of those who live, work and study here.

6.2 How is risk being managed?

If the Licensing Policy is not renewed in the above timeframe, the City Council will not legally be able to perform its function under the Act. The consultation process and approval dates have been planned to ensure that the Policy is in place at the required time.

The Statement of Licensing Policy will inform decisions taken by the licensing authority that will have an impact on the interests of private individuals and businesses. The Policy reflects the need to respect the relevant rights given by the Human Rights Act.

Decisions of the Licensing Authority are open to challenge through the Magistrates Court and beyond. The Statement of Licensing Policy is designed to ensure our compliance with legislation and statutory guidance, minimising the risk of legal challenge.

6.3 What is the impact on the organisation?

The adoption of the policy should have no impact on the organisation. There is no human

resource, financial or ICT implications.

6.4 Equalities / EIA

The Licensing Policy makes links to the Council's Equality and Diversity Policies, and an Equalities Impact Assessment exists for licensing activities. This has been reviewed and updated as part of the consultation process (Appendix 3).

6.5 Implications for (or impact on) climate change and the environment

None

6.6 Implications for partner organisations?

The Statement of Licensing Policy contributes towards the work of the Community Safety Partnership and specifically with the work of the police.

The effective operation of the Policy by the Licensing Authority and all enforcement agencies has an impact on the night time economy and on the co-existence of licensed premises with local residents and communities.

6.7 Human Rights Act Implications

None

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Cllr A S Khan	Elected Member	Cabinet Member for Policing & Equalities	06/11/2025	10/11/2025

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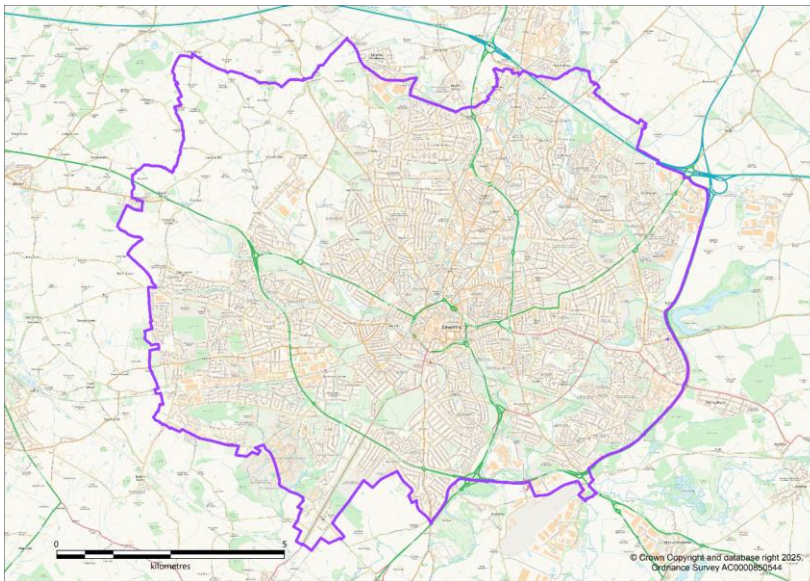
Licensing Act 2003

**Statement of
Licensing
Policy
2026 - 2031**

Important Note

In producing this Statement of Licensing Policy, the Licensing Authority is aware that the Government may from time to time amend the Licensing Act 2003, subordinate legislation and statutory guidance.

The Council does not intend to revise this policy document because of any such amendments and readers of this document are advised to check on the Home Office/Gov.uk website to ensure they have the latest information.



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Supporting documentation

The City Council, in consultation with the Responsible Authorities and the Community Safety Partnership has produced two guidance documents which give premises licence holders and other responsible staff practical guidance on the effective management of licensed premises.

These guides are issued during the licensing process and are also available from licensing pages of the City Council web site

- Guidance for On Licensed Premises
- Guidance for Off Licensed Premises

STATEMENT OF LICENSING POLICY

1 INTRODUCTION

1.1 Coventry City Council ('the Council') has a duty under the terms of the Licensing Act, 2003 ('the Act') to carry out its functions as the Licensing Authority with a view to promoting the following licensing objectives:

- **The prevention of crime and disorder**
- **Public safety**
- **The prevention of public nuisance**
- **The protection of children from harm**

1.2 The promotion of these objectives is the paramount consideration when determining an application and any conditions attached to an authorisation.

1.3 Coventry is a growing city situated in the West Midlands with a population of 360,700 inhabitants. It is mainly urban but includes significant areas that are semi-rural. A map of the city is shown on page 2.

1.4 This Statement of Licensing Policy relates to all those licensing activities identified as falling within the provisions of the Act, namely: -

- **The sale by retail of alcohol**
- **The supply of alcohol by clubs**
- **The provision of regulated entertainment**
- **The provision of late-night refreshment**

For the purposes of this document any reference to an "authorisation" means a Premises Licence, Club Premises Certificate, Temporary Event Notice (TEN) and where appropriate to the context, a Personal Licence.

1.5 The Council recognises that the licensing function is only one means of promoting delivery of the above objectives and should not therefore be seen as a means for solving all problems within the community. The Council will therefore continue to work with the Coventry Partnership, neighbouring authorities, West Midlands Police ('the Police'), the Coventry Community Safety Partnership, local businesses, arts organisations, performers, local people and those involved in child protection (Coventry Safeguarding Children Board) to promote the common objectives as outlined. In addition, the Council recognises its duty under S.17 of the Crime and Disorder Act, 1998, with regard to the prevention of crime and disorder etc.

1.6 This Policy Statement has been prepared in accordance with the provisions of the Act and the Guidance issued under Section 182 of the Act. The Policy statement is valid for a period of 5 years from 16th March 2026. This Policy Statement will be subject to review and further consultation prior to any substantial changes.

Responsible Authorities

1.7 A list of contact details for Responsible Authorities authorised under the Act is attached to this Policy Statement as Appendix 2.

- 1.8 The Council has recognised the Coventry Safeguarding Children Board as the local body competent to advise it on the Protection of Children from Harm and has designated it as a Responsible Authority for the purpose of Section 13 of the Act.

The Licensing Authority as a Responsible Authority

- 1.9 The Licensing Authority will, when acting as a Responsible Authority, act in accordance with the Government Guidance issued under Section 182 of the Act wherever possible. It will not normally intervene in applications where the issues are within the remit of another Responsible Authority and will ensure an appropriate separation of responsibilities between the officer administering an application and an officer acting as a Responsible Authority.

Public Health as a Responsible Authority

- 1.10 There is not a specific licensing objective related directly to health within the current legislation. When making a representation, the Director of Public Health is most likely to relate such representations to the objectives on Public Safety and Protecting Children from Harm. This is likely to include the prevention of accidents, injuries and other immediate harms that can result from alcohol consumption, such as unconsciousness or alcohol poisoning.
- 1.11 Health bodies hold valuable information which may not be recorded by other agencies, including analysis of data on attendance at emergency departments and the use of ambulance services following alcohol related incidents. Sometimes it may be possible to link ambulance callouts and attendance to irresponsible practices at specific premises. Anonymised data can be collated about incidents relating to specific premises and presented to Licensing Sub-Committees when representations are made.
- 1.12 Whilst the promotion of Public Health is not a licensing objective as set out in the Act, the Licensing Authority would support where appropriate, any voluntary initiatives that premises may wish to adopt to help reduce alcohol harm within our communities. These may include but is not an exhaustive list:
- Avoiding the sale of beers, lagers and ciders over 6.5% ABV which are sold in plastic bottles or metallic cans (Note: this does not include premium, craft or specialist products as these are not typically used by people with an alcohol use difficulty).
 - Taking steps to consider the display of alcohol in such a manner that will not unduly encourage people to drink irresponsibly and equally limit the exposure children have to alcohol advertising.
 - Refraining from placing alcohol products amongst, near or next to confectionary that would usually be consumed by children or young people (which would include till point toys or stickers).
 - The use of breathalysers as a means of determining intoxication and supporting door staff decisions not to admit or serve customers who are already intoxicated.
 - Refraining from selling single unit alcohol cans in areas where street drinking is prevalent.

2 CONSULTATION

2.1 Before publishing this policy statement, the Council has consulted with and considered the views of the following in line with the statutory guidance:

- Chief Constable of West Midlands Police.
- West Midlands Fire & Rescue Authority.
- Director of Public Health – Coventry City Council.
- Other responsible authorities.
- Representatives of current authorisation holders.
- Representatives of Local businesses; and
- Representatives of Local residents.

2.2 Further details on the consultation and political approval process undertaken prior to publishing this document are available via www.coventry.gov.uk/councilmeetings.

3 FUNDAMENTAL RIGHTS

3.1 Under the terms of the Act any person may apply for a variety of authorisations and have each application considered on its individual merits. Equally, any person has a right to make relevant representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the Act.

3.2 Applicants and those making relevant representations in respect of applications to the Council have a right of appeal to Coventry Magistrates' Court against the decisions of the Council.

4 LICENSING CONDITIONS

4.1 Licensing is about regulating the carrying on of licensable activities on licensed premises, by qualifying clubs and at temporary events within the terms of the Act. Premises include open spaces. Conditions attached to various authorisations will be focused on matters, which are within the control of individual licensees and others in possession of relevant authorisations. Accordingly, these matters will centre on the premises being used for licensable activities and the vicinity of those premises. If there is an incident or other dispute, the Council will primarily focus on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activities in the area concerned.

4.2 The Council cannot impose conditions unless it has received a relevant representation.

4.3 When considering any conditions, the Council acknowledges that licensing law should not be seen as the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and therefore beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned. Nonetheless, it is a key aspect of general control and licensing law will always be part of a holistic approach to the management of the evening and night-time economy of the city. For example, applicants should note that stricter conditions to control noise are likely to be imposed in the case of premises situated in largely residential areas.

4.4 The Council does not propose implementing standard licensing conditions on licences or other relevant types of authorisation across the board. Therefore, the Council will attach conditions to relevant authorisations which are tailored to the individual style and

characteristics of the premises and events concerned and that are appropriate to promote the licensing objectives in the light of the representations received.

5 OPERATING HOURS

- 5.1 The Licensing Authority welcomes the opportunities afforded to the local economy by the 2003 Act and will strive to balance this with the rights of local residents and others who might be adversely affected by licensable activities based on the principles laid down in this document
- 5.2 When dealing with licensing hours, each application will be dealt with on its individual merits. The Licensing Authority recognises that longer licensing hours regarding the sale of alcohol can assist in avoiding concentrations of customers leaving premises simultaneously. This is expected to reduce the friction at late-night fast-food outlets, taxi ranks and other sources of transport which can lead to disorder and disturbance. The Licensing Authority does not wish to unduly inhibit the development of thriving and safe evening and night-time local economies which are important for investment and employment locally and in the main welcomed by residents and visitors to the city.
- 5.3 The Licensing Authority will not set fixed trading hours within designated areas. However, an earlier terminal hour and stricter conditions regarding noise control than those contained within an application, may be appropriate in residential areas where relevant representations are received, and such measures are deemed appropriate to uphold the licensing objectives.
- 5.4 Shops, stores and supermarkets will generally be free to provide sales of alcohol for consumption off the premises at any times when the retail outlet is open for shopping, unless there are good reasons based on the licensing objectives for restricting those hours.

6 LATE NIGHT LEVY AND EARLY MORNING RESTRICTION ORDER(S)

- 6.1 The Licensing Authority, having not been presented with sufficient evidence to the contrary, does not consider that the application of a Late Night Levy or Early Morning Restriction Order(s) are appropriate for the Council's area at the present time. The Licensing Authority will keep these matters under review and accordingly reserves the right, should the need arise, to introduce these measures during the life of this statement of licensing policy.

7 CUMULATIVE IMPACT

- 7.1 For the purposes of this document 'cumulative impact' means the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area. Cumulative impact is a proper matter for the Council to consider in developing its licensing policy. This should not be confused with 'need', which concerns the commercial demand for another particular type of premises. Government Guidance states that "need" is not a matter for the Licensing Authority but is a matter for the planning authority and the free market.
- 7.2 The Licensing Authority, having not been presented with sufficient evidence to the contrary, does not consider any area within the city to currently have a particular concentration of licensed premises causing a cumulative impact on one or more of the licensing objectives. The Licensing Authority will keep this matter under review and

accordingly reserves the right, should the need arise, to introduce a special policy concerning cumulative impact during the life of this statement of licensing policy.

- 7.3 The absence of a special policy does not prevent any Responsible Authority or any other party from making representations on a new application for the grant of an authorisation on the grounds that the premises will give rise to a negative cumulative impact on one or more of the licensing objectives. The Act allows for such consideration, but the individual merits of each application must always be considered.

8 PROMOTION OF THE LICENSING OBJECTIVES

Prevention of Crime and Disorder

- 8.1 Licensed premises, especially those offering late night/early morning entertainment or alcohol and refreshment for large numbers of people, can sometimes be associated with elevated levels of crime and disorder.
- 8.2 The Licensing Authority expects existing authorisation holders and new applicants to regularly review their arrangements in addressing crime and disorder issues pertinent to their particular licensable activities, location and/or premises. Information and advice can be obtained from the Police, business network groups and other sources. The Licensing Authority also encourages local residents and other businesses to discuss issues of concern directly with individual businesses, or, to contact the Police Licensing Officer if they believe that particular licensed premises are failing to promote this objective.
- 8.3 The City Council as a statutory member of the Local Community Safety Partnership will develop and deliver against multi-agency strategies and action plans to tackle the misuse of alcohol, which has also been identified in the Cabinet Office's Alcohol Harm Reduction Strategy as being a precursor to crime and anti-social behaviour. The Licensing Authority expects existing authorisation holders and new applicants to be able to demonstrate the measures they use, or propose to adopt, to prevent and actively discourage the sale/supply of alcohol to children and the sale/supply of alcohol to individuals who are already intoxicated and thus potentially vulnerable themselves or pose a risk to others. In general, conditions will reflect local crime issues and subsequent prevention strategies.
- 8.4 The risk assessment approach remains fundamental in the operation and good practice of all licensed premises. Authorisation holders and applicants are strongly recommended to work closely with the Local Policing Unit Partnerships Team in particular, in bringing into effect appropriate control measures to either overcome established or prevent potential problems. A combination of short and longer-term strategies may need to be deployed by authorisation holders to sustain and promote the prevention of crime and disorder. The Police have a list of recommended Security Industry Authority (SIA) registered operators and we would advise that this list be used when considering the employment of SIA registered door staff.
- 8.5 During unprecedented times, such as a pandemic, authorisation holders will also have to work closely with other agencies, such as Environmental Health Officers in order to produce appropriate and adequate risk assessments to demonstrate compliance with relevant government guidance.
- 8.6 Queues at late night take-aways can be a source of disorder and applicants for Premises

licences for this type of premises are expected to address this in their Operating Schedule.

- 8.7 The City Council has specific duties under Section 17 of the Crime and Disorder Act 1998 that underpins any control strategy that is employed. The Council will continue to work in partnership with the Police in addressing crime and disorder issues.
- 8.8 The objective of preventing crime and disorder will include the Licensing Authority taking appropriate decisions and/or imposing appropriate conditions, upon a representation being received containing evidence that a licensed premises has a music policy which might incite violence, crime or disorder or the threat of such against minority groups.
- 8.9 Coventry's Director of Public Health will support the Police by facilitating access to health information such as anonymised A&E data due to alcohol related admissions. e.g. as part of a license review application. They will also provide Trading Standards with evidence of the health impact of illicit/counterfeit alcohol.
- 8.10 The Licensing Authority is of the view that generally, in order to promote the licensing objectives; all licensed premises within the city are encouraged to be members of the relevant local Pubwatch Scheme [Schemelink - Contact Coventry Pubwatch](#) where one exists.
- 8.11 The Licensing Authority and Police have a zero tolerance of illegal substance/drug misuse in licensed premises and recognise that drug use is not something that is associated with all licensed premises. However, it is recognised that special conditions may need to be imposed for certain venues to reduce the likelihood of drugs being sold and consumed on the premises and to achieving a safer environment for those who may have taken them.
Applicants & existing authorised Licence holders should consider the following:
Drink Spiking [Best practice – Coventry City Council](#)
Violence Against Women & Girls (VAWG) [Best practice – Coventry City Council](#)
Serious Youth Violence [Best practice – Coventry City Council](#)
Counter Terrorism [Best practice – Coventry City Council](#)
- 8.12 Once away from licensed premises a minority of consumers may behave inappropriately and unlawfully. There are additional mechanisms both within and outside the licensing regime that are available for addressing such issues. The Council will address a number of these issues through the Community Safety Service and the Local Partnership in line with the strategic objectives for crime and disorder reduction and drug and alcohol misuse within the city.
- 8.13 In relation to premises seeking or holding a Premises Licence and where alcohol will be sold under the terms of that licence the Licensing Authority expects that (a) any Designated Premises Supervisor (DPS) will have been given sufficient management authority and to be able to exercise effective day-to-day control of the premises and (b) authority to make alcohol sales when given by the DPS or any other Personal Licence holder should be clearly evidenced in writing. This is to ensure that premises selling alcohol are properly managed in accordance with the Act and that premises operate in a way that promotes the prevention of crime and disorder. This will also benefit operators themselves through being able to demonstrate a commitment to the proper management of premises, particularly if

enforcement becomes necessary

Promotion of Public Safety

- 8.14 Public safety is not defined within the Act, but the Government Guidance advises that it is concerned with the physical safety of people using the premises and not with public health. To ensure the safety of customers, applicants should be prepared to demonstrate, where necessary, that the premises comply with all health and safety regulations and that risk assessments, where needed are current, and in line with relevant government guidance.
- 8.15 Applicants and event organisers will be expected to assess not only the physical environment of the premises (or site) but also operational practices, in order to protect the safety of members of the public visiting the site, those who are employed in the business, those who are engaged in running an event or anyone else that could be affected by site activities. This assessment would normally take place within a risk assessment framework.
- 8.16 Holders of premises licences, and club certificates, or those organising temporary events, should interpret 'public safety' widely to include freedom from danger or harm.
- 8.17 For licensed or certificated premises and for temporary events, public safety must be kept under review and where changes to operational practices/events occur, or the customer profile changes, a review of risk assessments must be undertaken.
- 8.18 Fire safety is governed by the Regulatory Reform (Fire Safety) Order 2005 and is not something with which the Licensing Authority will normally become involved where the Responsible Authority has recommended a safe capacity limit on all or part of premises the Licensing Authority will normally expect an applicant/authorisation holder to follow such a recommendation unless there are good reasons for not doing so.
- 8.19 Businesses must ensure that in carrying out their activities they protect and support even the most vulnerable people and keep them safe from harm.
- 8.20 Coventry's Director of Public Health will support the sharing of health information such as anonymised A&E data with other responsible authorities where it links to public safety. They will also explore the impact of alcohol related incidents on emergency services such as West Midlands Ambulance Service.

Prevention of Public Nuisance

- 8.21 The Licensing Authority remains sensitive to the expectations and needs of different parts of the community in respect of leisure and cultural pursuits and will view applications accordingly. The impact of those activities on people who have to live, work and sleep within the local vicinity of a licensed premises or event will also be considered. If the impact of licensed activities is disproportionate and unreasonable or markedly reduces the amenity value of the area to local people, then the Licensing Authority will take account of this when exercising its functions. The Licensing Authority considers that the potential for public nuisance can be prevented or much reduced by good design and planning during new or ancillary construction works, by the provision of good facilities and effective management. This will require appropriate advice at the planning and development stages of new projects. Applicants should consider carefully the suitability of the premises for the

type of activity to be undertaken, particularly in terms of ventilation, odour, light emission, noise breakout and noise/vibration transmission to adjoining premises and the wider community.

- 8.22 Licence holders already in receipt of complaints should seek an early remedy to any confirmed problem. The organisers of temporary events should pre-empt potential nuisance, especially when complaints have previously arisen at the same venue.
- 8.23 The Licensing Authority expects authorisation holders to use their risk assessments and operating schedules to review and, if need be, to make necessary improvements to the premises, or to operational practices, in order to prevent public or statutory nuisance.
- 8.24 Where the provisions of existing legislation prove inadequate or inappropriate for control purposes, the Licensing Authority will consider imposing licence conditions. Any condition deemed appropriate and imposed by the Licensing Authority to promote the prevention of public nuisance will focus on measures within the direct control of the licence holder or designated premises supervisor.
- 8.25 Coventry's Director of Public Health and Wellbeing will provide evidence on the impact of the health and wellbeing of vulnerable groups such as street drinkers, and the effect this has on anti- social behaviour.

Protection of Children from Harm

- 8.26 The Act details a number of legal requirements designed to protect children in licensed premises. The Licensing Authority is duty bound to ensure that authorisation holders including organisers of temporary events, create safe environments (in terms of physical, moral and psychological welfare) for children who may be on the premises. Children should be unable to access alcohol or drugs and be subject to an appropriate level of care and supervision at all times.
- 8.27 The Act prohibits children aged under 16 years old and unaccompanied by an adult, from being present in licensed premises (including premises operating under a TEN) that are being used primarily or exclusively for consumption of alcohol
- 8.28 In premises where alcohol is sold or supplied it is a mandatory condition that premises licence holders will operate a recognised "Proof of Age" scheme. The City Council supports the Challenge 25 scheme and where this is not proposed within the operating schedule, alternative and similarly rigorous controls should be detailed. The City Council recommends that the premise licence holder operates a method for recording when a sale is refused as part of any age challenge scheme (also known as a refusals book).
- 8.29 The Licensing Authority expects that customers should be confronted by clear and visible signs on the premises that underage drinking constitutes an offence in law and that they may well be required to produce proof of their age to a member of staff. Organisers of temporary events should apply similar safeguards in their undertakings. By ensuring licensed premises refuse sales of alcohol to children, or those attempting to purchase it on behalf of children, this will impact positively on a reduction in child alcohol-related health problems.
- 8.30 Venue operators seeking premises licences and club premises certificates can volunteer prohibitions and restrictions in their operating schedules because their own risk assessments have determined that the presence of children is undesirable or

inappropriate. These will become conditions attached to the licence or certificate where no relevant representations are received by the Licensing Authority.

- 8.31 The Licensing Authority regards the Coventry Safeguarding Children Board as being the primary source of advice and information on children's welfare and would normally expect any advice/recommendations from the Board to be followed unless there are good reasons for not doing so. The Licensing Authority will attach appropriate conditions where these appear appropriate to protect children from moral, psychological or physical harm. It is also reasonable for the Licensing Authority to expect the Responsible Authorities to intervene where the basis for the intervention falls within the remit of that other authority. For example, the police should take appropriate steps where the basis for the review is concern about crime and disorder or the sexual exploitation of children.
- 8.32 The Licensing Authority will consider the need to protect children from sexual exploitation when undertaking licensing functions.
- 8.33 Where possible, the Director of Public Health and Wellbeing and the Caldicott Guardian will promote data sharing across appropriate organisations to facilitate decision making.
- 8.34 In order to prevent children from seeing films incompatible with their age, authorisation holders who exhibit films will be expected to impose and enforce viewing restrictions in accordance with the recommendations of the British Board of Film Classification (BBFC). In exceptional cases e.g. where the BBFC has not classified a film then the Council may specify viewing restrictions which an authorisation holder will be expected to comply with.
- 8.35 It is expected that authorisation holders will ensure that, whenever children are in the vicinity of a film or exhibition that is being shown/staged in a multi-purpose premises, sufficient ushers/stewards (minimum 18 years old) will be in attendance at the entrance to the viewing rooms at all times to ensure children cannot enter or view the film or exhibition.
- 8.36 Children have access to a range of regulated public entertainment venues and may be present as members of a viewing audience or as performers in their own right. The Licensing Authority expects authorisation holders including those organising temporary public events, to make proper provision for child safety and welfare during such events. Notwithstanding public safety issues, supervisory arrangements must be reflected within operating schedules. Suitable monitoring strategies should also be in place to ensure that supervisory levels are appropriate.
- 8.37 Where a large number of children are likely to be present on any licensed premises, for example, a children's show or pantomime, the Council may require that there is an adequate number of adult staff at places of entertainment to control access and egress of children and to protect them from harm. Children present at events as entertainers will be expected to have a nominated adult responsible for each child performer.
- 8.38 Child Exploitation - the exploitation of children can take a number of different forms and perpetrators may subject children and young people to multiple forms of abuse at the same time, such as criminal exploitation (including county lines) and sexual exploitation.
- 8.39 Through partnership working with the Police, Child Protection and other agencies the Licensing Authority will work towards raising awareness of the signs of child exploitation in licensed premises. This has direct links to **Coventry's Protocol for Addressing Adult Modern Slavery**

9 MANDATORY LICENSING CONDITIONS

12

- 9.1 The Government has introduced a range of mandatory conditions aimed at establishing minimum standards for the way alcohol is sold. The conditions apply to all alcohol retailers.

10 OTHER CONSIDERATIONS

Relationship with Planning

- 10.1 The Licensing Authority recognises that there should be a clear separation of the planning, building control and licensing regimes. Licensing applications will be viewed independently of planning applications.
- 10.2 The grant of any application or variation of a licence which involves a material alteration to a building would not relieve the applicant of the need to apply for planning permission or building control approval, where appropriate.
- 10.3 There are also circumstances when as a condition of planning permission; a terminal hour has been set for the use of premises for commercial purposes. Where these hours are different to the licensing hours, the applicant must observe the earlier closing time. Premises operating in breach of their planning consent would be liable to enforcement action under planning law.
- 10.4 The Local Planning Authority may also make representations against a licensing application in its capacity as a Responsible Authority, where such representations relate to one or more of the licensing objectives (see Paragraph 1.1 above).

Applications

- 10.5 An applicant may apply under the terms of the Act for a variety of authorisations and any such application will be considered on its individual merits. Any person may make representations on an application or seek a review of a licence or certificate where provision has been made for them to do so in the Act.
- 10.6 The Licensing Authority expects each and every applicant for a premises licence, club premises certificate or variation and TEN to address how they intend to meet the licensing objectives. Where no information is given by the applicant, there may be circumstances where the Licensing Authority considers the application to be incomplete and the application is returned without further processing.
- 10.7 In determining a licence application, the Licensing Authority will take each application on its merits. Licence conditions will only be imposed following a hearing and in order to promote the licensing objectives and will only relate to matters within the control and ability of the applicant. Licence conditions will not normally be imposed where other regulatory provision is in force (e.g. planning, environmental health, fire safety, and building control legislation) so as to avoid confusion and duplication, except where they can be exceptionally justified to promote the licensing objectives.
- 10.8 The Licensing Authority will impose only such conditions as are proportionate towards promoting the licensing objectives and which do not propose unnecessary burdens, and which are appropriate to the individual size, style and characteristics of the premises and events concerned.
- 10.9 In considering applications, the Licensing Authority will primarily focus on the direct impact of the activities taking place at the licensed premises on members of public living, working

or engaged in normal activity in the area concerned. The Licensing Authority recognises that licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from the licensed premises and, therefore, beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned.

- 10.10 Conditions include any limitations or restrictions attached to a licence certificate or other authorisation and essentially are the steps or actions the holder of the authorisation will be required to take or refrain from taking at all times when licensable activities are taking place at the premises in question.
- 10.11 It is recommended that an applicant for a TEN should give at least 28 days prior notice of their intended event, together with a full description of the event, risk assessment and details of how the applicant will promote the licensing objectives. Further, that at the same time of submitting their application to the Licensing Authority they serve notice to the Police and Environmental Health (unless an electronic application). Section 100 of the Licensing Act 2003 stipulates a period of at least 10 working days, exclusive of the day on which the event is to start and exclusive of the day on which the notice is given.

Deregulated Public Entertainment

- 10.12 As a result of the Live Music Act 2012 and The Legislative Reform (Entertainment Licensing) Order 2014 most public entertainment taking place between 0800 and 2300 hrs has, subject to certain conditions, been deregulated and removed from the scope of Licensing Authority control. No authorisation is required where public entertainment is being provided under these statutory exemptions. However, if exempt public entertainment is or will be taking place as well as licensable activities (e.g. selling alcohol) then an authorisation covering the licensable activities will still be required. Operators of 'on-licensed' premises should also note that it is possible to re-introduce full licensing controls over public entertainment where a premises licence or a club premises certificate has been reviewed and a Licensing Sub-Committee determines that it is appropriate for such controls to be re-introduced.

Large Scale Events and Safety Advisory Groups

- 10.13 Organisers of major events are encouraged to approach the Council at the earliest opportunity to discuss arrangements for the licensing of their events. Larger events will require a time-limited premises licence. This will involve the preparation of a substantial operating schedule, full public consultation, and a longer lead in period.
- 10.14 The Council requires a minimum notice period of not less than 3 months for events with a maximum number of attendees between 500 – 19,999, and not less than 6 months for events with a maximum number of attendees greater than 20,000. These events have significant potential to undermine the promotion of the Licensing Objectives due to the number of attendees, the temporary nature of facilities and the variety and complexity of matters that may be relevant. The Council believes these concerns can only be properly mitigated by an applicant engaging with the licensing process at an appropriate time before the event. As part of the process the applicant will be required to participate in the Council's Safety Advisory Group (SAG) meeting(s) prior to the event being held.
- 10.15 The Council's Regulatory Services Department co-ordinates a SAG with membership comprising of all the emergency response and responsible authorities who can support

event organisers on event planning if good time is allowed. All major events will be scrutinised by the SAG.

- 10.16 The Authority acknowledges the benefits of working closely with the Responsible Authorities and other statutory bodies in supporting event organisers in operating safe and well managed events. SAGs or multi-agency meetings are one way of promoting such partnership working.

11 Best Practice Schemes

Safe & Secure Licensed Venues

- 11.1 **PubWatch** – new applicants & existing authorisation holders are encouraged to be a member of a local PubWatch Scheme. Pubwatch is a community-based scheme, primarily focused on preventing crime and anti-social behavior in and around licensed premises. It involves licensees (owners of pubs and other licensed venues) working together to improve safety and security for staff, customers, and the wider community. Pubwatch schemes often share information, exchange support, and take joint action to address issues like anti-social behavior and criminal activity. Please click on the link for more information [Best practice – Coventry City Council](#)

12 GUIDANCE FOR ON AND OFF LICENSED PREMISES

- 12.1 Guidance has been developed by the Licensing Authority and the Responsible Authorities to provide a reliable source of information to support authorisation holders in the responsible day to day management of their premises and advise what they must be doing to comply with the Licensing Act. This guidance will be referred to whenever the Licensing Authority or any Responsible Authority have made recommendations for improvements in the management of licensed premises or where new conditions of operation are being considered.
- 12.2 Every licensed premise has been issued with this guidance and new applicants or new Licensees will receive a copy as part of the application process. Further copies can be downloaded from the City Council web site. [Need to add a link](#)

13 INTEGRATING STRATEGIES AND THE AVOIDANCE OF DUPLICATION

- 13.1 By consulting widely prior to this policy statement being published, the Council has taken full account of local policies covering crime prevention, public health, anti-social behaviour, culture, transport, planning and tourism as part of an integrated strategy for the Council, police and other agencies. Many of these strategies may not be directly related to the promotion of the licensing objectives, but indirectly impact upon them.
- 13.2 There are a number of wider issues which may need to be given due consideration when dealing with applications. The Council's Licensing and Regulatory Committee can request reports, where it thinks it is appropriate on the following areas: -
- the needs of the local tourist economy to ensure that these are reflected in their considerations;
 - the employment situation and the need for new investment and employment where appropriate;

- the general impact of alcohol related crime and disorder, by providing regular reports to the planning committee. This will enable the planning committee to have regard to such matters when taking its decisions and avoid any unnecessary overlap; and
- the national and local needs of when dealing with a pandemic.

Crime, Nuisance and Harm Prevention strategies

- 13.3 Crime, nuisance, harm prevention and drug and alcohol misuse strategies developed through the Coventry Community Safety Partnership (CCSP) will be reflected in any licence conditions suggested by Responsible Authorities, so far as possible.
- 13.4 The CCSP, with membership including the Council, Police and the West Midlands Fire Service, is committed to making Coventry a safe place in which to live, work and visit. The CCSP will co-ordinate action to protect and support our most vulnerable children and adults. It is the role of the CCSP to strategically plan, commission and oversee services that tackle crime and disorder and address drug and alcohol misuse.

Health and Wellbeing Strategy & Drug & Alcohol Strategies

- 13.5 Alcohol has been identified as a priority within Coventry's Health and Wellbeing Strategy. Drinking too much can cause physical and mental harm. Public health related licence conditions will be used where practicable to reduce the impact of alcohol on public safety and other licensing objectives
- 13.6 The vision of Coventry's Drug & Alcohol Strategy is to reduce the harms caused by alcohol misuse and make Coventry a safer and healthier place where less alcohol is consumed. This aim can be supported through opportunities within the licensing process. Public Health prevention & harm reduction campaigns/projects in line with Coventry's Drug & Alcohol Strategy are integral to licensing in Coventry.

Cultural strategies

- 13.7 The Cultural Strategy has been developed within the context of Coventry's existing arts infrastructure, initiatives and activities. The Council will monitor the licensing of regulated entertainment and particularly live music and dancing, to ensure that potential event organisers have not been deterred from making applications because of licensing requirements.

Coventry a Marmot City

- 13.8 In line with the principles of the Marmot Review 'Fair Society, Healthy lives' Coventry City Council has agreed to develop common policies to reduce the scale and impact of health inequalities across the city. This includes focusing interventions such as alcohol reduction on reducing the social gradient in health.

There is a social gradient in the harms from alcohol consumption, but not in alcohol consumption itself. Quantities and patterns of drinking differ across socio- economic groups, as do harmful outcomes.

According to the Marmot Review, those people from more deprived areas who consume alcohol are more likely to have problematic drinking patterns and dependence than those from more affluent areas.

With regards to under 18s, the evidence suggests that fewer young people are drinking alcohol than they did in the past and fewer are suffering serious health implications needing attendance at hospital. However, despite recent declines, the proportion of children in the UK drinking alcohol remains well above the European average and the majority of 17 year olds do drink alcohol. The UK continues to rank among the countries with the highest levels of consumption among those who do drink, and British children are more likely to binge drink or get drunk compared to children in most other European countries. Furthermore, other consequences of alcohol consumption such as regretted sexual activity, arguments, involvement in crime and violence are more prevalent than hospital attendance ([PHE - Data intelligence summary: Alcohol consumption and harm among under 18 year olds](#)).

Transport

- 13.9 As part of an agreed enforcement protocol where the police have identified a particular need to disperse people from the city centre swiftly and safely so as to avoid situations which could lead to disorder and disturbance, the Council will inform those responsible for providing local transportation so that arrangements can be made to reduce the potential for problems to occur.

Duplication

- 13.10 When considering any application, the Council will avoid duplication with other regulatory regimes so far as possible. Therefore, the Council will not attach conditions to an authorisation in relation to a matter covered by another regulatory regime unless going beyond such a regime is considered appropriate for the promotion of the licensing objectives in the particular circumstances.

Promotion of Equality

- 13.11 The Licensing Authority in carrying out its functions under the Act is obliged to have 'due regard' to the need to eliminate unlawful discrimination harassment and victimisation, to advance equality of opportunity and to foster good relations between persons with different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The Government Guidance advises that conditions should not be attached to authorisations which would duplicate existing statutory requirements. The Council therefore takes this opportunity to remind operators of premises of their duties towards disabled persons (including performers) on their premises under the Building Regulations and the Equality Act 2010. This includes a duty that any person who provides a service to the public must make reasonable adjustments to any physical feature that makes it impossible or unreasonably difficult for a disabled person to access a service, or to provide the services by a reasonable alternative means.

14 ENFORCEMENT

- 14.1 The Licensing Authority has an established working relationship with the Police and other enforcing authorities on enforcement issues. This will provide a more efficient deployment of resources targeting high risk premises and activities.
- 14.2 This enforcement regime in relation to licensing follows the Government's Regulators' Code in that it follows the basic principles of Openness, Helpfulness, Proportionality and Consistency. This is clarified by the operation of a ladder of intervention for Licensed

Premises. This ladder of intervention is contained at Appendix A. [Link to enforcement policy.](#)

- 14.3 Licensed premises are visited by the Responsible Authorities and the Licensing Authority to carry out targeted inspections to check that the premises licence/certificate is being complied with, to check compliance with other legislation and/or to deal with a complaint that has been received.
- 14.4 On some occasions a multi-agency group (representing a number of Responsible Authorities) known as the Licensing Taskforce, will visit the premises. The Taskforce officers inspect the areas of the premises relevant to their role. Again, any action taken will be in line with the ladder of intervention.
- 14.5 There are several enforcement options available depending on the outcome of the inspection or complaint which includes:
- Verbal advice – this covers minor complaints/infringements where advice is seen as the most appropriate way to deal with the issue.
 - Written warning – this is a step-up from verbal advice and authorisation holders are given a letter recording the warning given and containing the details of any necessary remedial action.
 - Action planning – this plan will be written down and given to the authorisation holder and DPS. It explains what actions are required and within what time period, in order to comply with the licensing objectives, specific legislation or conditions. It will be regularly reviewed and if the authorisation holder/DPS have complied, the action plan will be terminated. If there are areas of non-compliance, the authorisation holder may face prosecution or their authorisation may be called for a review.
 - Mutual consent to the addition of licensing condition which reflects a harm identified by any of the Responsible Authorities and which the premise licence holder agrees not to continue (known as a minor variation).
 - Review – when there is evidence to show that the licensing objectives are not being met then the authorisation holder will have to attend a review hearing in front of the Licensing Sub-Committee. A decision will be made by the Licensing Authority Sub-Committee based on the evidence put forward as to whether the DPS will be removed and/or the authorisation revoked, suspended, amended or have additional conditions applied.
 - Prosecution – under the Licensing Act, certain offences can be instituted by the Licensing Authority / Director of Public Prosecutions / the Weights and Measures Authority (Trading Standards). In addition, Responsible Authorities have a wide range of powers to institute prosecution under other specific legislation depending on the nature of evidence found.
 - Closure – The Council and several of the Responsible Authorities have the power to close licensed premises whilst on site if they deem it necessary e.g. the Police, Health & Safety, Environmental Health, Trading Standards and the Fire Service. The Licensing Team also have powers to request closure through the Magistrates Court for continuing unauthorised alcohol sales.

15 ADMINISTRATION, EXERCISE AND DELEGATION OF FUNCTIONS

Licensing and Regulatory Committee

- 15.1 The powers of the Council under the Act may be carried out by the Licensing and Regulatory

Committee, by a Sub-Committee or, instead, by one or more Council officers acting under delegated authority.

15.2 It is considered that many of the decisions and functions will be purely administrative in nature. In the interests of speed, efficiency and cost effectiveness the Council has delegated these functions to Sub-Committees, or in appropriate cases, to officers supporting the licensing function.

15.3 Where under the provisions of the Act there are no relevant representations on an application these matters will be dealt with by officers. Should there be relevant representations then an oral hearing will usually take place before a licensing sub-committee except where all parties agree to proceed in writing. A licence/certificate review will normally take place before a licensing sub-committee. The following table sets out the delegation of functions:

Matters to be dealt with	Full Committee	Sub Committee	Officers
Application for personal licence		If a police objection	If no objection made
Application for premises licence/club premises certificate		If a relevant representation made	If no relevant representation made
Application for provisional statement		If a relevant representation made	If no relevant representation made
Application to vary premises licence/club premises certificate		If a relevant representation made	If no relevant representation made
Application to vary designated premises supervisor		If a police objection	All other cases
Request to be removed as designated premises supervisor			All cases
Application to transfer of premises licence		If a police objection	All other cases
Application for interim authorities		If a police objection	All other cases
Application to review premises licence/club premises certificate		All cases	
Decision on whether a complaint is irrelevant frivolous vexatious etc.			All cases
Decision to object when local authority is a consultee and not the relevant authority considering the application	All cases		
Determination of a police/EHO objection to a temporary event notice		All cases	
Determination of a Minor Variation application			All cases
Removal of the requirement for a designated premises supervisor at community premises		If a police objection	All other cases

Application forms and process

15.4 The application form will be in the prescribed format. The operating schedule will form part of

the completed application form for a premises licence and a club premises certificate. The form will need to contain information that describes the style of the venue, the licensable activities to be provided, the operational procedures, hours, nature of the location, needs of the local community, etc. Most importantly, the applicant will have to detail the steps that will be taken to promote the licensing objectives. Applicants should carry out a risk assessment before they apply for a licence.

- 15.5 Applicants are encouraged to fully consult the police and other statutory services well in advance of carrying out their risk assessments and submitting their applications. Application forms and guidance leaflets will be available from the Licensing Team and our website, including contact names for each of the responsible authorities that will be receiving applications. Most applications will require additional documentation and a fee to be included with the form. Incomplete applications will not be considered and will be returned to the applicant.
- 15.6 Where national guidance permits, online applications will be accepted providing the necessary documentary attachments are uploaded into the application and the appropriate fee paid. Coventry is currently using the Electronic Licence Management System (GOV.UK) which is supported by the Department of Business Innovation and Skills.
- 15.7 Applicants are encouraged to make themselves aware of any relevant planning and transportation policies, tourism and cultural strategies and local crime, alcohol, drug and disorder strategies in order to take these into account, where appropriate, when formulating their operating schedule. Guidance notes containing contact and website information about these policies will be available from the Licensing Team, Regulatory Services. Contact details are below.

16 Environmental Best Practice in Licensed Premises

- 16.1 Applicants and authorised licence holders are encouraged to provide evidence as to how they would promote environmental protection and are encouraged to join the Council in working towards their target of net zero carbon emissions by 2050 by considering a number of measures [Best practice – Coventry City Council](#)

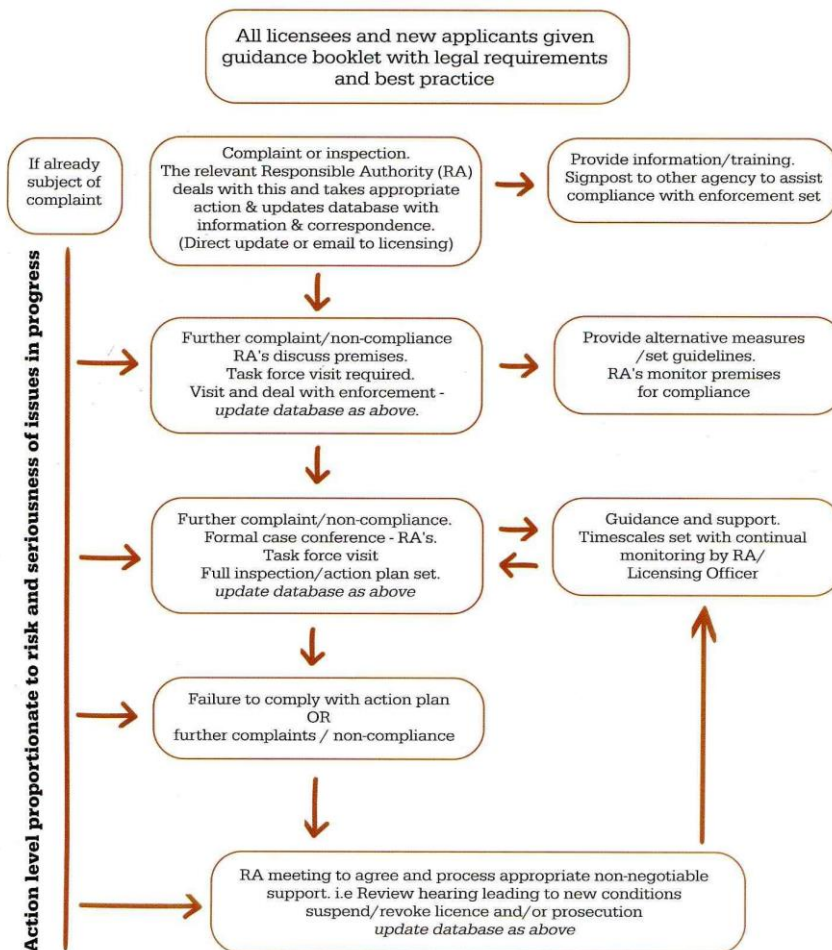
17 Comments on this Policy

- 17.1 The Statement of Licensing Policy will be reviewed on a regular basis. Individuals and organisations that wish to comment on the policy are invited to send their comments in writing to:

Regulatory Services
PO Box 7097
Coventry
CV6 9SL
Telephone Number: 024 7697 5496
E-mail: licensing@coventry.gov.uk
Website: www.coventry.gov.uk

APPENDIX A

Ladder of intervention - approach to enforcement issues



APPENDIX 2

Licensing Act 2003 – Responsible Authority Contacts

Licensing Authority:

Coventry City Council
Licensing Team,
PO Box 7097
Coventry
CV6 9SL
Telephone: 024 7697 5496

Contact:

licensing@coventry.gov.uk

Chief Officer of Police:

West Midlands Police
Little Park Street
Coventry
CV1 2JX
Telephone: 024 7653 9097

Contacts:

cv_licensing@west-midlands.pnn.police.uk

Fire Authority

Applications
Fire Service Head Quarters
99 Vauxhall Road,
Vauxhall,
Birmingham,
B7 4HW

Contact:

firesafety.admin@wmfs.net

Safeguarding Children Board

Social Services & Housing
Chairing and Reviewing Service
PO Box 7097
Coventry
CV6 9SL

Contacts:

safeguardingchildrenlicensing@coventry.gov.uk

Health & Safety Enforcing Authority

Coventry City Council
Regulatory Services
PO Box 7097
Coventry
CV6 9SL

Contacts:

Food and Health & Safety
ehcommercial@coventry.gov.uk

Environmental Protection

Coventry City Council
Regulatory Services
PO Box 7097
Coventry
CV6 9SL

Contacts:

Environmental Protection
Env.protection@coventry.gov.uk

Trading Standards

Coventry City Council
Regulatory Services
PO Box 7097
Coventry
CV6 9SL

Contact:

Trading Standards/Business
Compliance
tradingstandards@coventry.gov.uk

Director of Public Health & Wellbeing
Coventry City Council
PO Box 7097
Coventry
CV6 9SL

Contact:
Public Health
publichealth@coventry.gov.uk

Planning Authority
Coventry City Council
PO Box 7097
Coventry
CV6 9SL

Contact:
Planning
planning@coventry.gov.uk

Secretary of State (Home Office Immigration Enforcement)
Licensing Compliance Team (LCT)
2 Ruskin Square
Dingwall Road
Croydon
CR0 2WF

Contact
ie.licensing.applications@homeoffice.gov.uk

OTHER USEFUL CONTACTS:

Health & Safety Executive
Licensing Applications/Consultation
19 Ridgeway
9 Quinton Business Park
Quinton
Birmingham
B32 1AL
Telephone: 0300 790 6787

Coventry City Council Events Team
Coventry City Council
PO Box 7097
Coventry
CV6 9SL

Email: events@coventry.gov.uk

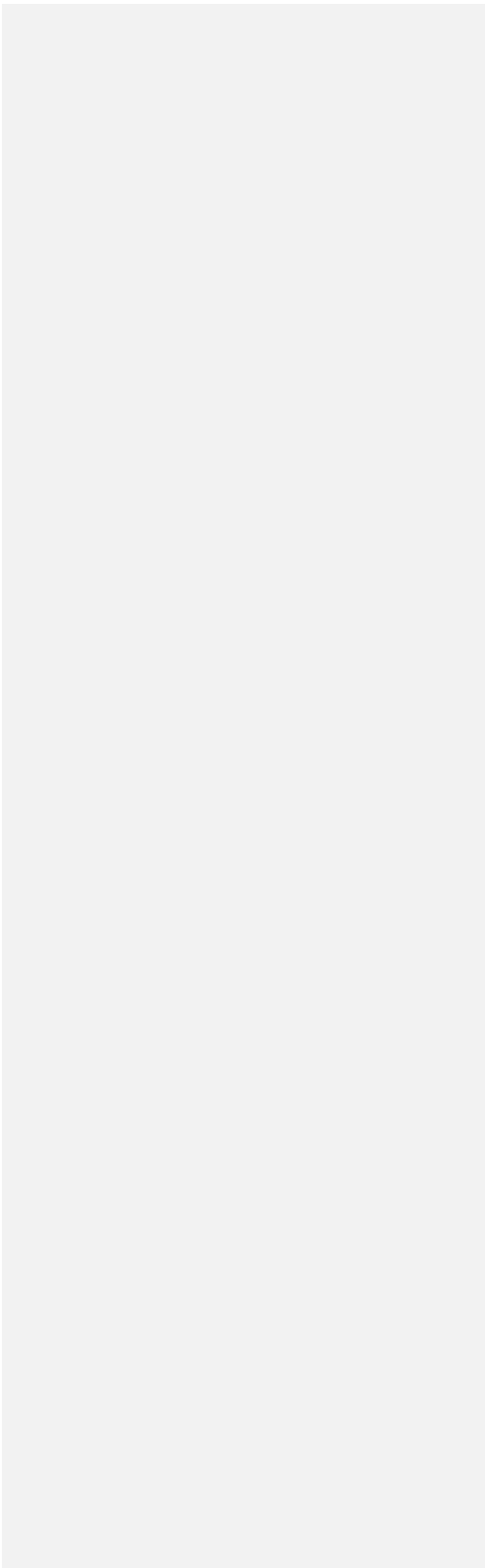
Obtain a basic disclosure DBS for your Personal Licence

[Request a basic DBS check - GOV.UK](#)

If you need this information in another format, please contact:

Telephone: 024 7697 9456

e-mail: licensing@coventry.gov.uk



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Appendix 2

Responses to Coventry City Council Statement of Licensing Policy Consultation

12th August 2025 – 7th October 2025

1. Background

- 1.1 The public consultation on the draft Statement of Licensing Policy took place for 8 weeks from 12th August 2025 – 7th October 2025.
- 1.2 The consultation was extensive and included a range of statutory consultees, stakeholders and local communities.
- 1.3 Ten responses were received during the consultation period.
- 1.4 All consultees were asked for comments on the draft policy, which have been organised into themes and are presented below.

Respondent	Feedback/Comments/Amendments	Action
	<p><u>Section 1-7 – General Statement</u> Can we ensure that not too many in areas of high anti social behaviour</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> Can we ensure that those selling school not to minors also undergo dbs checks</p> <p><u>Section 24 – Enforcement</u> Any breaks condition get stripped licence for a year without appeal and hefty fines</p>	<p>Noted. No change.</p> <p>Noted. No change</p> <p>Noted. No change</p>
	<p><u>Section 1-7 – General Statement</u> I feel that the Licencing of properties selling alcohol and food need to be stricter on the noise the general public are making when vacating the establishment . It should not be up to the residents that are suffering the noise to have to call the noise enforcement , only for them to not turn up . The responsibility should be the responsibility of the establishment. This should be enforced by the council.</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> Noise Pollution</p> <p><u>Section 10-13 – Best Practice</u> The establishment should be responsible for the noise when they leave the venue</p> <p><u>Section 14 – Enforcement</u> There should be strict rules and guidelines for these establishments</p>	<p>Noted but no action required for the Policy – Already addressed in paragraph 8.21.</p>
	<p><u>Section 1-7 – General Statement</u> I'm happy with the current licensing</p> <p><u>Section 8 – Promotion of the Four Licensing Objectives</u></p>	<p>Noted. No change</p>

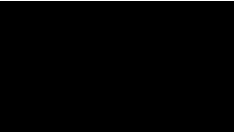

	<p>I'm happy with the current licensing</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> None</p> <p><u>Section 10-13 – Best Practice</u> I'm happy with the current licensing</p> <p><u>Section 14 – Enforcement</u> I'm happy with the current licensing</p> <p><u>Section 16 – Environmental Best Practice</u> I'm happy with the current licensing</p>	
Public Health (Coventry City Council)	<p><u>Section 1-7 – General Statement</u> The Public Health and Insight Team met and consulted on the Alcohol and Entertainment license policy, and overall were impressed with the considerations contained within the policy, however, is there a possibility for Coventry to add local licensing objective around Protecting and Improving Public Health and wellbeing (we appreciate that this is not reflected in the law but wondered if it would be something that could be considered locally) Are there any other LA areas that have done so? If not, could we add a separate section on health to the policy encompassing the points below? Also, may be useful to state how closely linked the policy has been reviewed looking through a Public Health lens (Could use examples from Scotland) For Example: Heading- Health and Wellbeing – Subheading Context</p>	<p>Noted no action required</p> <p>Public Health's role as a Responsible Authority is outlined in Para 1.12.</p> <p>This has been included in Para. 13.6</p>

	<p>Part of a wider role of licensing to promote better health in the city Our legal duty</p> <p>Local Approach to prioritising health and reducing inequalities (Including local strategies and best practice)</p> <p>How it links to One Coventry</p> <p>To also include under the subheading the following subsections:</p> <p>Health impacts of alcohol</p> <p>Public health approach</p> <p>Inequalities and Marmot city</p> <p>Health impacts</p> <p>Have a section outlining, from a health perspective, the impact of alcohol, with a few key stats, and why it's important to use this policy to promote better health of residents of Coventry</p> <p>Public health approach</p> <p>How we will address health – prevention and system work</p> <p>Link in the drug and alcohol strategy, where it feeds into the system, etc. To also include other pieces of work, HWB strategy, PH business plan, anything ICB, Prevention framework</p> <p>Public Health Teams' responsibilities</p> <p>Inequalities</p> <p>Inequalities across the city – Such as the Indices of Multiple Deprivation Mapping Marmot city since 2013, a way of tackling our health inequalities</p> <p>Wider Prevention tackling the causes of inequality by strengthening the social determinants of health/ building blocks, good quality housing, access to health care, education, transport, employment planning and responsible licensing.</p> <p>Other Comments</p> <p>1.12</p> <p>Has single-unit retail been considered?</p>	<p>Condition included in Para. 1.12</p>
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Can we include something around alcohol free options?	Noted. No change
Could we include a bullet point for joint Public Health prevention and harm reduction campaigns/projects in line with Coventry's local drugs and alcohol strategy	Noted & included in 13.6
1.3 – Coventry's population based on the 2024 Mid-Year ONS Estimate is 369.026	Noted. No change
Appendix 2 – Responsible Authority Contacts	
Public Health Email address (can this be updated?) – publichealth@coventry.gov.uk	Noted. amended
<u>Section 8 – Promotion of the Four Licensing Objectives</u>	
8.3 – Link to updated National Government Strategy regarding Drugs and Alcohol – please see link: From harm to hope: A 10-year drugs plan to cut crime and save lives - GOV.UK	Noted. No change
8.5 – To also work closely with local and regional health protection teams regarding best practices	Noted. No change
8.10 Are we considering other models (similar to Pubwatch) ?	Noted. No Change
8.11 Rather than linking to the council best practice, could be more beneficial to link to updated strategies/policies/plans.	Noted No change
Example: Domestic Abuse Strategy 2018-2025 – Coventry City Council or Enough campaign https://enough.campaign.gov.uk/	Noted. No change
8.33 - Hospital admissions data is not held by Public Health – may be helpful to rephrase this to	Noted. Updated.

	<p>Where possible, the Director of Public Health and Caldicott Guardian will promote data sharing across appropriate organisations to facilitate decision making.</p> <p>8.39 May be helpful to link to the CCC modern slavery strategy</p> <p>Overall:</p> <p>In section 8 where it refers to the Director of Public Health responsibilities, it may be more useful to say the Public Health team can support/advise.</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments</p> <p><u>Section 10-13 – Best Practice</u> 13.5 – Link to new health and wellbeing strategy – Coventry Health and Wellbeing Strategy 2023-2026 – Coventry City Council</p> <p>13.6 – Link to new Coventry drug and alcohol strategy - Drugs and alcohol – Coventry City Council</p> <p>Section 13 – May be worth referring to the upcoming Smoking and Vaping Bill</p> <p><u>Section 14 – Enforcement</u> No comments</p> <p><u>Section 16 – Environmental Best Practice</u> No comments</p>	<p>Noted. Updated</p> <p>Noted. No change</p> <p>Noted & referenced</p> <p>Noted & referenced</p> <p>Noted. No change</p>
<div></div> <p>(Home Office)</p>	<p>We do not currently have a response, however can you please ensure your own records and your Responsible authorities list, shows our updated contact details?</p>	<p>Noted. Updated</p>

	<p>NB: You may be aware that our team has changed name and we have moved offices in the last year.</p> <p>Our new contact details are now:</p> <p>Home Office Immigration Enforcement Licensing Compliance Team (LCT) 2 Ruskin Square Dingwall Road Croydon CR0 2WF</p> <p>Email: IE.licensing.applications@homeoffice.gov.uk</p>	
	<p>As a business owner operating on Far Gosford Street, I would like to provide feedback regarding alcohol licensing in this area. My main concern is the high concentration of off-licence alcohol outlets located within a very short distance of each other.</p> <p>This oversaturation has already had a negative impact on the community, including: An increase in antisocial behaviour and public nuisance.</p> <p>A less family-friendly environment, which discourages customers who come to the area for other services.</p> <p>Unfair competition that undermines the balance of local businesses, many of which do not sell alcohol.</p> <p>In my view, the Licensing Policy should ensure that new licence applications in areas where there is already a high density of alcohol outlets are carefully restricted, in order to protect community wellbeing and maintain a safer, more balanced local economy.</p>	<p>Noted. No change. However, we can look a cumulative impact zone</p>

	I therefore respectfully urge the Council to take these concerns into account when reviewing the Licensing Policy and when considering new applications in Far Gosford Street.	
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments <u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments <u>Section 10-13 – Best Practice</u> No comments <u>Section 14 – Enforcement</u> No comments <u>Section 16 – Environmental Best Practice</u> No Comments	Noted. No change
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments <u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments	Noted. No change

	<u>Section 10-13 – Best Practice</u> No comments <u>Section 14 – Enforcement</u> No comments <u>Section 16 – Environmental Best Practice</u> No Comments	
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments <u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments <u>Section 10-13 – Best Practice</u> No comments <u>Section 14 – Enforcement</u> No comments <u>Section 16 – Environmental Best Practice</u> No Comments	Noted. No change
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments	Noted. No change

	<p><u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments</p> <p><u>Section 10-13 – Best Practice</u> No comments</p> <p><u>Section 14 – Enforcement</u> No comments</p> <p><u>Section 16 – Environmental Best Practice</u> No Comments</p>	
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Equality Impact Assessment

EIA-755461224 - Review of Statement of Licensing Policy - Alcohol & Entertainment

Details

Title	Review of Statement of Licensing Policy - Alcohol & Entertainment
Author	Rekha Masih (Licensing Team Leader)
Head of Service	Davina Blackburn (Strategic Lead - Regulation & Communities)
Cabinet Member	Cllr Abdul Khan (Policing and Equalities)
Director	Julie Newman (Law and Governance)

Context and background

EIA carried out on	Review of policy or strategy
Background	<p>Licensing Act 2003 states that the Statement of Licensing Policy for alcohol & entertainment must be reviewed every 5 years. The current policy expires in March 2026.</p> <p>The Act specifies licensing objectives which are central to the regulatory regime, which are:</p> <ul style="list-style-type: none"> Prevention of Crime & Disorder Public Safety Prevention of Public Nuisance Protection of Children from Harm
Stakeholders	<p>Any premises that sells alcohol</p> <p>Any premises that provides regulated entertainment</p> <p>Any premises that provides Late Night Refreshment (hot food & drink after 23:00 hours)</p> <p>Coventry residents & visitors</p>
Responsibility	Rekha Masih

Consideration of impact

Baseline data and information

We have approximately 900 licensed premises in Coventry.

In England in 2023, 19% of adults had not drunk alcohol in the last 12 months. This proportion has remained stable, between 17% and 20%, since 2011 (NHS Digital, 2024)

The COVID-19 pandemic polarised drinking patterns, with people previously consuming alcohol at lower levels further decreasing their drinking, and people previously consuming alcohol at higher levels further increasing their drinking (Public Health England, 2021)

Marmot Principles

- 3. Ensure a healthy standard of living for all
- 4. Create fair employment and good work

Protected groups - Impact on Coventry Residents and Visitors

Age 0-18

Positive impact - Licensing Act 2003 - One of the four licensing objectives is to Protect Children from Harm. This policy will have a Positive impact on age. Actions and objectives are stated in the policy that will help protect young people. The policy outlines what the licensing authority’s duty is in and what the Council expects from licence holders in respect of protecting young people from harm. The policy makes provision for the Safeguarding Children Team to act as the responsible authority for matters relating to the protection of children from harm and enables them to comment on variations/new applications and request reviews of licences.

According to NHS England (2024), in England in 2023: 37% of pupils aged 11-16 said they had ever had an alcoholic drink

Prevalence increases with age, from 15% of 11 year olds to 62% of 15 year olds

5% of all pupils said they usually drank alcohol at least once per week, similar to 6% in 2021

The proportion of those drinking alcohol at least once per week also increases with age, from 1% of 11 year olds to 11% of 15 year olds

Age 19-64	<p>Positive impact - Enables the Licensing Team to regulate licensed premises and ensure that they are providing a safe environment for customers to enjoy the night time economy.</p> <p>In England, alcohol consumption among adults aged 19 to 64 varies significantly. According to the NHS England Digital report, 30% of those aged 55 to 74 drank at least 14 units of alcohol per week, compared to 19-24% of other age groups. The AUDIT test indicates that 88% of adults had low risk drinking behaviour or abstained. The health risks associated with drinking alcohol, such as accidents, injuries, cancer, heart disease, and reduced life expectancy, tend to increase with higher consumption. Since 2016, UK guidelines have focused on regular weekly consumption, recommending that men and women should not normally consume more than 14 units of alcohol a week, including some days where no alcohol is drunk.</p>
Age 65+	<p>Positive impact - Enables the Licensing Team to regulate licensed premises and ensure that they are providing a safe environment for customers to enjoy the night time economy.</p> <p>Among adults aged 65 to 74, the proportion who usually drink more than 14 units per week (at increasing or higher risk) varies across age groups, increasing up to the age of 55 to 64 (30% of all adults, 38% and 23% of men and women respectively).</p>
Disability	<p>Positive impact - Research suggests that individuals who live with a disability in the UK are more likely to experience the risk factors associated with alcohol dependency, such as low self-esteem, disempowerment, and living with cognitive limitations. Disabilities have a huge impact on an individual's capacity to live their life as normal.</p> <p>They can restrict physical movement, their ability to use public transport, or their confidence in doing things by themselves. Everyone can suffer differently, and unemployment is common.</p> <p>These kinds of restrictions can force individuals to give up things that they previously enjoyed (if they have developed their disability over time), or miss out on what others do, fuelling feelings of helplessness, anxiousness, or depression.</p> <p>Alcohol can become a way of dealing with this. Individuals can drink to forget that they can't do the things that they used to, or if they have always had their disability, they might drink to forget that they can't do the same things as their friends.</p>
Gender reassignment	<p>No impact -</p>

Marriage and civil partnership	No impact -
Pregnancy and maternity	Positive impact - Very few women reported that they drank more than a unit of alcohol a week in pregnancy (2.9% of women for whom alcohol usage was known), although the fact that this is self-reported means that it may be an underestimate. Most women (97.1%) reported that they drank little to no alcohol a week (1 unit or fewer).
Race	Positive impact - Ethnicity plays a significant role in alcohol consumption patterns. While some ethnic groups, such as Bangladeshi and Pakistani men and women, tend to drink less than others, there are also higher rates of higher risk drinking among certain groups, such as older Irish men and men belonging to the Sikh religion. Ethnic minorities may face barriers to accessing alcohol treatment services and often seek help only after experiencing serious health consequences. Understanding these patterns is crucial for addressing alcohol-related issues in a culturally competent and equitable manner.
Religion and belief	No impact -
Sex	Positive impact - Research consistently shows that a higher percentage of alcoholics are male compared to female, with men being roughly twice as likely to struggle with alcohol dependence. This gender gap is attributed to a combination of biological, social, and cultural factors, including differences in metabolism, societal norms around drinking, and varying levels of access to treatment. While men dominate the statistics, it's important to note that women may face unique challenges, such as faster progression from casual drinking to dependency and heightened health risks, making gender-specific data essential for tailored prevention and intervention strategies.
Sexual orientation	No impact -

Additional groups

Care experienced

Positive impact - Looked after children and care leavers aged 11–19 years have a fourfold increased risk of alcohol and drug use compared to their peers and have been found to drink alcohol more frequently and at higher intensity than those who are not care-experienced (Meltzer, 2003). children (aged 11–17 years old) placed in residential units were found to drink alcohol more frequently than those in foster care; 42% drank alcohol at least once a month, compared with 25%, figures considerably higher than the 9% for young people not looked after (Meltzer, 2003). Thus, while it is well established that the child's environment and transient lifestyle can have adverse effects on young people in care, it is also the case that placement type, whether foster, kinship or residential care, can also influence levels of alcohol.

Armed forces

Positive impact - The statistics on alcohol consumption among the armed forces reveal a significant concern regarding alcohol misuse. Between July 2012 and April 2023, 9,676 UK armed forces personnel had at least one Read code for alcohol misuse, with 966 personnel having at least one Read code for alcohol dependence. The breakdowns by service, gender, and calendar year show a pattern of alcohol misuse across various branches and demographics. The Royal Navy had the highest number of personnel with alcohol dependence Read codes, while the Army had the lowest. The data highlights the need for continued monitoring and support for personnel dealing with alcohol misuse.

Socio economic groups

Positive impact - Socioeconomic status (SES) is one of the many factors influencing a person's alcohol use and related outcomes. Findings have indicated that people with higher SES may consume similar or greater amounts of alcohol compared with people with lower SES, although the latter group seems to bear a disproportionate burden of negative alcohol-related consequences. These associations are further complicated by a variety of moderating factors, such as race, ethnicity, and gender. Thus, among individuals with lower SES, members of further marginalized communities, such as racial and ethnic minorities and homeless individuals, experience greater alcohol-related consequences.

Next steps

Inequality	Action	Owner	Timescale

Monitor and evaluation

The Policy must be reviewed every 5 years and the EIA will also be reviewed

Impact on Council staff

Will there be an impact?

No

Completion statement

Potential equality impact

Positive impact has been identified for one or more protected groups