



# City of Westminster Executive Director Report

**Decision Maker:** *Sarah Newman, Executive Director City Management & Communities*

**Date:** *5<sup>th</sup> December 2022*

**Classification:** *General Release*

**Title:** *Decision to Extend: Public Spaces Protection Order (PSPO) Extension – Street Gambling on Westminster Bridge*

**Wards Affected:** *St James*

**Key Decision:** *No*

**Financial Summary:** *There are no financial implications*

**Report of:** *Francisco Franco-Mendes, Neighbourhood Coordinator / ffrancomendes@westminster.gov.uk*

## 1. Executive Summary

- 1.1. In December 2016, the Cabinet Member authorised the creation of a Public Spaces Protection Order (PSPO) under Section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 (the Act) to tackle anti-social behaviour (ASB) associated with street gaming and street gambling on Westminster Bridge and the surrounding area.
- 1.2. That order was made for three years and in December 2019 an extension of 3 years was authorised under Section 60(2) of the act. This order will expire on the 19th of December 2022.
- 1.3. At any point before the expiry of the Order, the Council can extend it by up to three years if it is considered necessary to prevent the occurrence or recurrence of the activities identified in the order, or an increase in the frequency or seriousness of those activities. Extending the Order requires that the Council consult with the local police and any other community representatives they think appropriate before doing so.
- 1.4. This report summarises the process to justify an extension to the order for a further three years and the basis for concluding that the statutory tests for doing so (set out in Section 60(2) of the Act) are met.

## **2. Recommendations**

- 2.1. To extend the existing PSPO prohibiting street gaming and Gambling in an area surrounding Westminster Bridge for a further three years from 19 December 2022 to 19 December 2025. This is the maximum period a PSPO can be extended.

## **3. Reasons for the decision**

- 3.1. We have the power under section 60 of the Anti-social Behaviour, Crime and Policing Act 2014 to extend the existing Public Spaces Protection Order for a further three years. We are required to extend the current order before it is due to expire on the 19<sup>th</sup> December 2022.

## **4. Background, including Policy Context**

- 4.1. The Order was originally agreed and enacted in December 2016 and then extended for a further three years in December 2019. The effect of the PSPO is to prohibit people from engaging in street gambling and street gaming, and from frequenting or loitering in the street on his own behalf or on behalf of someone else, for betting, agreeing, to bet, or paying, receiving, or setting bets, or assisting other to do so. The prohibitions apply in an area that extends along the Westminster side of the Westminster Bridge area and an area surrounding the approach to the bridge on the Westminster side.
- 4.2. The PSPO makes it an offence for a person without reasonable excuse to engage in activities prohibited by this Order and a person found to be in breach is liable on summary conviction to a maximum penalty of a level 3 fine, up to £1000. As an alternative to prosecution, an offender may be given a Fixed Penalty Notice (FPN). If the offender pays the fixed penalty within the time stipulated for doing so in the Notice this would discharge that person's liability to be prosecuted for the substantive offence.
- 4.3. A local authority can only implement a PSPO within its borough boundaries. As the issues span across Westminster Bridge and thus across the Westminster / Lambeth border, it was determined that to ensure seamless enforcement across the bridge, to have two PSPO's that are aligned in terms of both area, and prohibitions.
- 4.4. Lambeth's PSPO expired on the 10<sup>th</sup> October 2022. Lambeth' officers have indicated that they intend to reintroduce the PSPO although a timeline for this not yet known. Lambeth have cited challenges due to other priorities and resourcing as well as organisational changes which are ongoing as the reason for the delay.
- 4.5. Enforcement is possible by both Westminster Police and Council Officers, and to enforce the PSPO the signage in the area will need to be updated.
- 4.6. The Police CAD system has recorded 1005 calls in relation to fraud and ASB in Westminster and Lambeth Fraud at Westminster Bridge over the last three years. There have been 28 Crime reports logged regarding the illegal gamblers over that period. However, this includes the lockdown period and historically there has been an under-representation of the scale of the issue as these offences are typically not reported.

- 4.7. Since the extension of the PSPO in 2019 the Police here have opted to continue arresting for the offence of illegal Street Gambling due to the challenges of enforcing against groups comprised mainly of foreign nationals. The problems have returned following the end of the Lockdown period and since the beginning of this year there have been several multi-agency operations. This has resulted in 4 arrests for providing facilities for gambling, 6 Community Protection Notice Warnings, and 2 FPN's being issued. The most recent case was taken to court in November 2022 and resulted in a 12-week custodial sentence being given as well as a two-year Criminal Behaviour Order (CBO) to an individual for facilitating gambling on the bridge.
- 4.8. Since February 2019 Lambeth has issued over 290 FPNs, demonstrating the persistent and continuing nature of the problems on Westminster Bridge. Lambeth have also successfully prosecuted offenders that failed to pay an FPN, in each case securing fines and council costs in bringing proceedings.
- 4.9. The Councils Public consultation to extend ran for 4 weeks and received 45 responses with 91 % strongly supporting or supporting the extension. 3% strongly opposed and 6 % neither support or oppose the extension. 88% of those who responded said that street gambling is a very or fairly big problem, with 3% responding that it is not a very big problem and 9% responding don't know.
- 4.10. The persistent and continuing nature of the ASB on Westminster Bridge, the scale of enforcement opportunities demonstrated, public support for the proposal in the public consultation supports the recommendation to extend.

## **5. Proposal**

- 5.1. The power to extend the existing PSPO sits within section 60 of the Act. We are required to extend the order before it is due to expire on the 19<sup>th</sup> Decembers 2022.
- 5.2. To approve the extension, we must be satisfied that doing so is necessary to prevent occurrence or reoccurrence of the activities identified in the order, or that there will be an increase in frequency or severity of the activities identified.
- 5.3. Offences relating to the 'provision of gambling facilities' and 'cheating', attempting to cheat, or assisting another person to cheat at gambling are provided for under the Gambling Act 2005, and were previously and still to some extent relied upon to enforce offences in Westminster Bridge. However, these offences are difficult to prove and as such, prior to the creation of the Order, took considerable police resources to enforce or went unpoliced. The original Cabinet Member briefing requesting permission to consult and the EMT paper authorising the PSPO set out the ASB witnessed on Westminster Bridge prior to December 2016.
- 5.4. The Police CAD system has recorded 1005 calls in relation to fraud and ASB in Westminster and Lambeth Fraud at Westminster Bridge over the last three years. There have been 28 Crime reports logged regarding the illegal gamblers over that period. However, this includes the lockdown period and historically there has been an under-representation of the scale of the issue as these offences are typically not reported.
- 5.5. Intelligence from the Metropolitan Police, Westminster City Inspectors, and Lambeth council officers reaffirm the behaviours and associated ASB arising from street gaming and

gambling in the area that continue to have a detrimental impact on the quality of life of those in the locality:

- **Organised Crime** - illegal activity on the bridge is co-ordinated by large groups with upwards of 100 known individuals operating on the Bridge at any given time
- **Fraud** - there have been a number of examples throughout the past year of victims having had several hundred pounds stolen.
- **Pick pocketing and theft** - this is a common offence associated with those who conduct street gaming and gambling on the Bridge. Large numbers of tourists use Westminster Bridge daily and the activities associated with gambling increase the vulnerability of tourists in the area to theft
- **Deliberate targeting of vulnerable people** - there have been reports of people with addictions or mental health problems being exploited by those street gambling and street gaming in the area.

5.6. This issue tends to be focused on those visiting the area and the nearby attractions rather than Westminster residents however we do receive communications from those that have been affected by street gambling and victims of these gangs. This communication has increased over the recent summer months.

5.7. This serves to highlight the direct impact of the behaviours associated with street gambling and street gaming to people frequenting Westminster Bridge, and that these behaviours remain persistent. Officers are satisfied that the statutory test for the PSPO has been met.

5.8. It is recommended that any decision to extend should be done in conjunction with a clear commitment from all parties in Westminster, specifically the Police and Council, to greater use of the enforcement powers in conjunction with partners on the Lambeth side of the bridge.

## 6. Consideration of Alternatives

6.1. Consideration has been given to alternative options to tackle the problems associated with street gambling and street gaming on Westminster Bridge. Pre-existing legislation is difficult to apply on the scale that is observed on Westminster Bridge and much of the issues go unreported.

6.2. The Anti-Social Behaviour, Crime and Policing Act 2014 has several legislative tools that allow local authorities and the Police to tackle anti-social behaviour, crime and disorder. Within the act, the following options are available; Injunctions, Criminal Behaviour Orders, Dispersal Powers, Community Protection Notices, Closure Orders and Closure Notices.

6.3. Injunctions are individually focussed and granted through a court process. The evidence in this report shows that the behaviours are widespread and require a more immediate response. As such, an injunction is deemed to be too slow, and impractical to process and enforce.

6.4. Criminal Behaviour Orders (CBO), as with injunctions, are aimed at individuals and granted through a court process. They stipulate that a court must be "satisfied beyond

reasonable doubt that the offender has engaged in behaviour that has caused or was likely to cause harassment alarm or distress to any person". In relation to street gaming and street gambling, the detrimental impact evidenced in Section 2 does not always relate to harassment, alarm and distress caused to any person. Additionally, as with injunctions, the same practical implications apply with regards to the cost, processing, and enforcement of such individual orders relating to such a widespread issue.

- 6.5. Dispersal powers relate only to police officers, which reduces the resources that can deal with the issue. The existing PSPO and proposed extension authorises council officers as well as police officers to enforce the order. Dispersal powers are also time limited to 48 hours and must be repeatedly put in place by an officer ranked Inspector or above. They only allow the officer to compel an individual to leave a specified locality for an exclusion period, which would not prevent future street gaming or gambling. Police officers must be satisfied that the person in the locality has contributed or is likely to contribute to harassment, alarm or distress to members of the public, or the occurrence of crime and disorder in the locality.
- 6.6. Community Protection Notices are focused on individuals and premises. Like PSPO's they focus on detrimental impact on the quality of life of those in their locality. However, they are more suited to individual specific issues caused by one person or one premises. This does not resolve the issue of street gaming or street gambling. The evidence indicates the issue is too widespread, with behaviour often exhibited by numerous people, often at the same time, and over large geographical areas.
- 6.7. Closure Notices issued by the police or local authority and closure orders issued by a court relate to specific premises which either have, or are likely to have, engaged in crime and disorder or serious nuisance. They are time limited and relate to premises only, so do not adequately deal with the scale of the problem or the individuals involved.
- 6.8. A Public Space Protection Order is the most suitable because it allows:
  - A suitable geographical area to be defined;
  - Prohibitions to apply to everyone;
  - Street gaming and street gambling equipment to be seized following a breach;
  - Council officers and Police officers are able to enforce the order; And
  - the order can last long enough to effect change.

## **7. Consultation**

- 7.1. The first order was implemented following a four-week public consultation from the 15th of August 2016 until September the 9th 2016. 17 respondents completed the questionnaire, with 76% strongly supporting a PSPO to tackle St gambling and gaming; alongside this, 62 people responded to Lambert's consultation with 95% strongly supporting the introduction of a PSPO. The results of this consultation and all other evidence were presented to the Executive Management Team (EMT) member for City Management and Communities on the 13th of October 2016. Following this, the EMT member agreed to implement the order.
- 7.2. It is also obligatory under section 72, subsection (3)(b), that a local authority must carry out the necessary consultation and the necessary publicity and the necessary notification (if any), before extending the period for which a PSPO has effect.

- 7.3. The statutory guidance regarding the process of consultation does not specify in detail what format nor over what time frame consultation to extend a PSPO should take. Legal advice in 2022 suggested a time frame of four weeks given the nature of the consultation and the changes being imposed.
- 7.4. Due to this being an extension of an already existing PSPO which was passed with significant level of public scrutiny in 2016 and 2019, the appropriate legal and strategy goals continued to be met, and the wording of the order to be implemented has not changed, a brief public consultation for four weeks closing on Sunday the 25th of November 2022 was deemed reasonable. The consultation was published on the Westminster website and available through our dedicated consultation space open forum: <https://www.westminster.gov.uk/about-council/consultations>
- 7.5. The consultation asked the following questions, again replicating the questions and ran from Monday 31<sup>st</sup> October to Sunday 25<sup>th</sup> September 2022:
- Thinking about the proposed restricted area shown in the map, how much of a problem, if at all, do you think street gambling or gaming is to people living in, working in, or visiting the area?
  - Again, thinking about the proposed restricted area shown in the map, has street gambling affected you in either a positive or negative way over the last 12 months when you have been in the area?
  - Have you personally been affected by anti-social behaviour which is linked to street gaming or street gambling?
  - If yes, what exactly did those conducting the games do? (conditional question)
  - If yes, how did the experience it make you feel? (conditional question)
  - To what extent do you support or oppose the use of a PSPO to prohibit street gambling or gaming in the area shown in the map?
  - Do you have any other comments regarding street gambling and gaming or the use of a Public Spaces Protection Order (PSPO)?
- 7.6. Westminster's online consultation received 45 responses with 91 % strongly supporting or supporting the extension. 3% strongly opposed and 6 % neither support or oppose the extension. 88% of those who responded said that street gambling is a very or fairly big problem, with 3% responding that it is not a very big problem and 9% responding don't know. Overall Westminster's public consultation shows that there is overwhelming local support for the extension of the street gambling and street gaming PSPO.

## **8. Risk management.**

- 8.1. If the process to introduce a PSPO is not followed correctly this could lead to a challenge to the authority including legal costs and reputational damage. To mitigate risks, all key stakeholders will be involved in consultation and implementation.

- 8.2. If the PSPO order is extended, but we fail to enforce due to capacity or other issues this could lead to reputational damage to their council. Given the different approaches to enforcing the PSPO and tackling street gambling and gaming between Westminster and Lambeth Councils, officers should seek to establish a clear joint agreement for future operations.
- 8.3. Given Lambeth have not extended their PS PO at this stage there is a very real risk that the behaviour associated with gambling will be significantly displaced and concentrated on Lambeth's half of the bridge. This will lead to a situation where on the Westminster half of the bridge the PSPO can be enforced but on Lambeth's half it cannot.

## 9. Financial Implications

- 9.1. Cost of the consultation has been met from within existing departmental budgets.

## 10. Legal considerations

- 10.1. Section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 ("the 2014 Act") Provides the power for local authorities to make to what this provision calls a Public Spaces Protection Order (PSPO). A PSPO is designed to tackle a range of activities which have a detrimental effect on a local community's quality of life and may in respect of a specified area; either prohibit specified things being done in that location and/ or require specified things to be done by persons carrying on specified activities in that place. Those restrictions/ requirements can be targeted at specific people and designed to apply only at specific times or in certain circumstances. Once made, a PSPO empowers a Constable (or other authorised persons as defined in the 2014 Act) ("Officers") to enforce a prohibition or requirement set out in the PSPO.
- 10.2. A PSPO may be made if the council is satisfied on reasonable grounds that two conditions are met
- i. Activities carried on in a public place within the authority's areas have had a **detrimental effect on the quality of life** of those in the locality, or it is likely that the activities will be carried on in a public place within the area that they will have such an effect.
  - ii. That the effect, or the likely effect, of the activities is, or is likely to become a of a **persistent or continuing nature** such as to make, and justifies the restrictions imposed by the order.
- 10.3. As to the prohibition set out in the order, the council must be satisfied that they are reasonable to impose too (a) prevent the detrimental effect referred from continuing, occurring or recurring, or (b) reduce that detrimental effect or reduce the risk of its continuance, occurrence or reoccurrence.
- 10.4. Anyone breaching the terms of a PSPO without reasonable excuse commits an offence punishable by a fine set at Level 3 on the standard scale (currently £1000). Officers may issue an offender with a Fixed Penalty Notice (FPN) in lieu of prosecution, in which case payment of the FPN would discharge the offender from any criminal liability.

- 10.5. A PSPO may not have effects for more than three years unless it is extended under Section 60 of the 2014 act. The process for extending an order in this way must be undertaken before the PSPO expires. In accordance with Section 60(2), The council makes a PSPO if satisfied on reasonable grounds that it is necessary to prevent:
- a) Occurrence a recurrence after that time of the activities identified in the Order; Or
  - b) an increase in the frequency or seriousness of those activities after that time.
- 10.6. In December 2016 the council made a PSPO targeting street gambling and street gaming in Westminster. that PSPO was extended in 2019 and is due to lapse on the 19th of December 2022. This report proposes to extend the PSPO for a period of three years.
- 10.7. Section 72 (1) of the 2014 Act requires that in deciding whether to extend a PSPO and, if so, for how long the council must have particular regard to the rights of freedom of expression and freedom of assembly and association set out in articles 10 (right to respect to for private life) and 11(right to freedom of assembly and association) of the Convention for the Protection of Human Rights and Fundamental Freedoms (“The Convention”). Whilst acknowledging that the proposed order potentially entails an infringement of the aforementioned articles of the Convention, it is considered that these qualified rights may in this instance be legitimately interfered with in the interest of public safety, the prevention of crime and disorder and in accordance with the law.
- 10.8. Sections 72 (1) & (3) of the 2014 Act Requires that the local authority carry out the necessary consultation and publication, before deciding to extend a PSPO. This means that the council must publish a notice on its website setting out its proposals to extend the order in question and to consult with the chief officer of police and MOPAC, with such local community groups as the accounts will cease fit, and with any owners of land covered by the PSPO. Section 9 summarises the outcome of the consultation undertaken to date.
- 10.9. Section 1.9 of the equalities Act 2010 sets out new public sector equality duty replacing the previous duties in relation to race, sex and disability an extending the duty to all protected characteristics I E race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment.
- 10.10. The public sector equality duty requires public authorities to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation;
  - Advance equality of opportunity; and
  - Foster good relations between those who share a protected characteristic and those who do not.
- 10.11. Part of the duty to have “due regard” where there is disproportionate impact will be to take steps to mitigate the impact and the council must demonstrate this has been done, and/ or justified the decision, on the basis that it is a proportionate means of achieving a legitimate aim. Accordingly, there is an expectation that a decision maker will explore other means which have less of a disproportionate impact.

- 10.12. The equality duty must be complied with before and at the time that a particular policy is under consideration or a decision is taken - that is common in the development of policy options and in making a final decision.
- 10.13. The Anti-Social Behaviour, Crime and Policing Act 2014 (publication of Public Spaces Protection Orders) regulations 2014, sets up the menu in which a PSPO must be published once it is extended and requires that we, (a) publish the order as extended on our website; and (b) cause to be erected on or adjacent to the public's place to which the order relates such notice (or notices) as it considers sufficient to draw the attention of any members of the public using that place to (i) the effect of that the order being extended.
- 10.14. Further guidance in relation to the making of a PSPO is set out in the Home Office Guidance Document (Anti-Social Behaviour, Crime and Policing Act 2014: Policing Act 2014: Anti-social behaviour powers-Statutory guidance for front line professionals) Updates December 2017 (See background documents).

## **11. Crime and Disorder implications**

- 11.1. The extension of the street gaming and street gambling PSPO on Westminster Bridge and the surrounding area will have a significant positive impact on Community Safety in Westminster.
- 11.2. The PSPO enables Council and Police officers to efficiently enforce against behaviours that are causing a detrimental impact to the local community, economy and tourist trade.
- 11.3. The prohibited behaviours are linked through intelligence to much greater harms including modern slavery, human trafficking, prostitution and exploitation of young people. The PSPO enables Westminster officers to fine and prosecute offenders for breach of PSPO and non-payment of fines, disrupting their activity and feeding into a partnership with other organisations to tackle wider harms and issues associated with street gaming and gambling in this context.

**If you have any queries about this Report or wish to inspect any of the Background Papers please contact:**

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## **BACKGROUND PAPERS**

[EMT Report and PSPO order 2016](#)

[EMT Report - Street Gambling PSPO Extension Dec 2019](#)

[2022 Cabinet Briefing - Decision to Consult Street Gambling PSPO renewal](#)

**APPROVAL BY CABINET MEMBER OR OFFICER IN ACCORDANCE WITH THE SCHEME OF DELEGATION:**

For the reasons set out above, I agree the recommendation in the report entitled

*Decision to Extend: Public Spaces Protection Order (PSPO) Extension – Street Gambling on Westminster Bridge*

Signed: \_\_\_\_\_ Date: 18<sup>th</sup> December 2022

NAME: Sarah Newman

State nature of interest if any .....

.....  
*(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter)*

For the reasons set out above, I agree the recommendation(s) in the report entitled  
.....and reject any alternative options  
which are referred to but not recommended.

Signed .....  .....

Executive Director, Bi-Borough Children's Services

Date ...18<sup>th</sup> December 2022.....

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment: .....  
.....  
.....

If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Head of Legal and Democratic Services, Strategic Director Finance and Performance and, if there are resources implications, the Strategic Director of Resources (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

**CITY OF WESTMINSTER**  
**Anti-Social Behaviour, Crime and Policing Act 2014**

**THE CITY OF WESTMINSTER PUBLIC SPACES (Westminster and Golden Jubilee Bridges)**  
**PROTECTION ORDER 2022**

This Order has been made under section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 (“the Act”) by the Council of the City of Westminster and shall come into force on 19<sup>th</sup> December 2022.

The Council of the City of Westminster (“the Council”) makes this Order, being satisfied on reasonable grounds that the activities set out at paragraph 2 in the location described in paragraph 1 and the Schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature, and these activities are unreasonable and justify the restrictions imposed by the notice and that it is in all the circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

**EXTENT**

1. This Order applies to the area in the City of Westminster (the restricted area) to which the public have or are permitted to have access, whether with or without payment, as identified in the Schedule and more particularly shown edged in red on the plan attached, including any street, road, footway, footpath, square, courtyard, bridge, grassed area, stairway, walkway, subway or other similar place in the open air.

**PROHIBITED ACTIVITIES WITHIN THE RESTRICTED AREA**

2. (1) No person shall at any time engage in any prohibited activities mentioned in paragraph 2. (2) below.
2. (2) The activities are—
  - (a) Street Gambling  

To include Playing of a game of chance for winnings in money or money’s worth, whether any person playing the game is at risk of losing any money or not.
  - (b) Street Gaming
3. (1) To include frequenting or loitering in the street within the restricted area either on his own behalf or on the behalf of someone else, for the purpose of betting, agreeing to bet, or paying, receiving or settling bets, or assisting others to do so.
3. (2) To include pretended games of chance where there is in reality no opportunity to win.

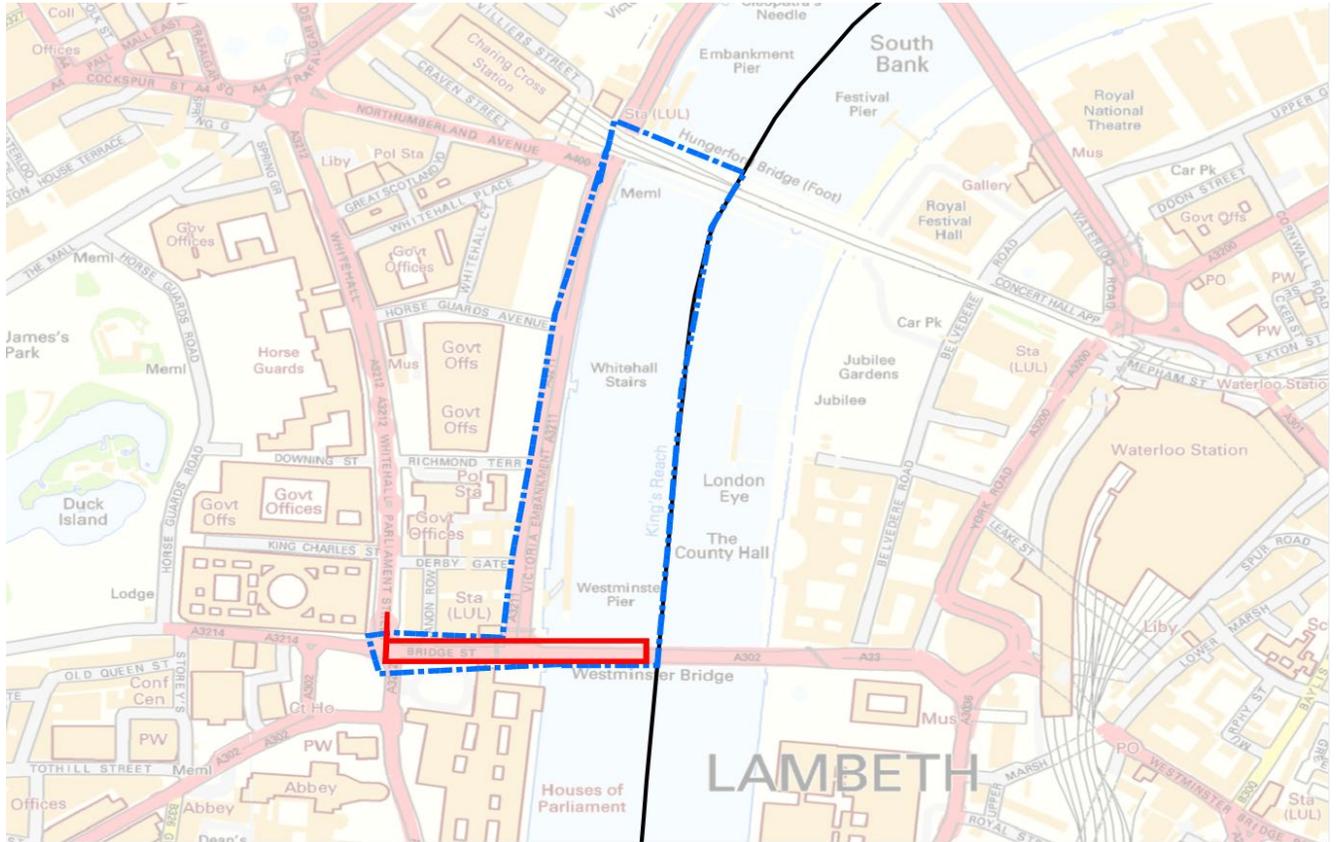
**PENALTY**

4. It is an offence for a person without reasonable excuse to engage in an activity that is prohibited by this Order. A person found to be in breach of this Order is liable on summary conviction to a maximum penalty of a level 3 fine or to a Fixed Penalty Notice up to £100.

## DURATION

5. This Order shall remain in force for a period of [3 years] unless extended under Section 60 of the Act.

## Schedule- Restricted Area



## Street Gaming and Street Gambling PSPO Consultation Results

Which of the following best describes you?										
									Response Percent	Response Total
1	Local resident								67.65%	23
2	Local worker								5.88%	2
3	Local resident and worker								20.59%	7
4	Representative of a local business								0.00%	0
5	Representative of a local organisation								2.94%	1
6	Visitor								2.94%	1
7	Other (please specify):								0.00%	0
<b>Statistics</b>	Minimum	1	Mean	1.74	Std. Deviation	1.24	Satisfaction Rate	12.25	answered	34
	Maximum	6	Variance	1.55	Std. Error	0.21			skipped	0
Other (please specify): (0)										
No answers found.										

How often do you visit the area shown on the map above?										
									Response Percent	Response Total
1	Every day								3.03%	1
2	A few times a week								30.30%	10
3	Once a week								15.15%	5
4	A few times a month								21.21%	7
5	Once a month								3.03%	1
6	Less than once a month								21.21%	7
7	I have never visited the area shown								6.06%	2
<b>Statistics</b>	Minimum	1	Mean	3.79	Std. Deviation	1.74	Satisfaction Rate	46.46	answered	33
	Maximum	7	Variance	3.02	Std. Error	0.3			skipped	1

**How much of a problem, if at all, do you think street gambling or gaming is to people living in, working in, or visiting the area shown on the map above?**

									Response Percent	Response Total
1	A very big problem								52.94%	18
2	A fairly big problem								35.29%	12
3	Not a very big problem								2.94%	1
4	Not a problem at all								0.00%	0
5	Don't know								8.82%	3
<b>Statistics</b>	Minimum	1	Mean	1.76	Std. Deviation	1.14	Satisfaction Rate	19.12	answered	34
	Maximum	5	Variance	1.3	Std. Error	0.2			skipped	0

**Has street gambling or gaming affected you in either a positive or negative way over the last 12 months when you have been in the area shown on the map above?**

									Response Percent	Response Total
1	It has affected me / my organisation in a positive way								0.00%	0
2	It has not affected me or my organisation								48.48%	16
3	It has affected me / my organisation in a negative way								39.39%	13
4	Don't know								12.12%	4
<b>Statistics</b>	Minimum	2	Mean	2.64	Std. Deviation	0.69	Satisfaction Rate	54.55	answered	33
	Maximum	4	Variance	0.47	Std. Error	0.12			skipped	1

## Can you tell us how this has affected you / your organisation in a negative way?

			Response Percent	Response Total
1	Open-Ended Question		100.00%	13
1	04/11/2022 18:07 PM ID: 203126443	I sometimes see tourists being lured in and I often think that they are being preyed upon  It also makes me feel sorry for the group that are facilitating it as I wonder if they have work permitted on their immigration status and if they do why are they unable to seek legal work. Are they being supported by modern slavery team if they are being exploited by gangs as their families back home could be threatened		
2	07/11/2022 10:32 AM ID: 203227443	Drain on resources		
3	07/11/2022 11:10 AM ID: 203231102	I am primarily aware of people clustering around under the bridge arches, when passing through as a commuter - previously on a bicycle and now using Embankment station when arriving from the Thames Clipper ferry. I do not feel threatened when there are plenty of other commuters around, but would not feel comfortable on darker afternoons when there are fewer people around.		
4	15/11/2022 17:19 PM ID: 204060363	it prevents my staff from walking to the office from Waterloo Station as the pavement over Westminster Bridge can be crowded from the gambling gangs and the players. They can often be intimidating. They do not provide a good experience for tourists and can lead to a negative view of Westminster for visitors.		
5	18/11/2022 19:52 PM ID: 204380425	It has made me loose trust in Westminster safety and remediation action to tackle criminals cheating tourists and passerbys on the Westminster bridge and also outside Selfridge's in the late afternoon hours around and after closing times and also a few times in the south area of Hyde park around serpentine lake.		
6	18/11/2022 19:56 PM ID: 204380636	Was approached by a young tourist crying asking for help as he had been cheated by these street scammers/gamblers		
7	18/11/2022 20:33 PM ID: 204382207	I feel so sorry for the young unsuspecting tourists who are targeted by the gambling gangs and cheated out of their holiday money. It is very rare to see the crowds round the gambling sites broken up by the police, though they must be in the area. A campaign of prosecutions and the breaking up of these groups of criminals would do a lot for our tourist trade and the reputation for fair play in the UK.		
8	18/11/2022 22:01 PM ID: 204386288	It feels intimidating. It is blatant criminality. It gives a very poor impression of London to visitors. It is ripping off innocent tourists. Tourists and residents/local workers alike should not be exposed to such obvious scams.		
9	18/11/2022 23:28 PM ID: 204388850	It is a rip-off to vulnerable parts of society, often visitors to our city who do not know about the scam and leav dissapointed. When cycling passed, the larger, organised groups often step onto the cycle path creating dangerous situations.		
10	19/11/2022 07:11 AM ID: 204393806	It is low level crime which gives a negative impact on visitors views of London.		
11	20/11/2022 09:41 AM ID: 204469760	Poor pedestrian flow on Westminster bridge		
12	21/11/2022 18:19 PM ID: 204584088	It has worked to appall me. You don't see this sort of thing on the bridges in Paris! It's shameful that the police/authorities have not done anything about it sooner.		
13	22/11/2022 10:12 AM ID: 204652588	As a 71yr old man, It's extremely intimidating and I don't feel as safe as I did in the past. I have also been approached by unscrupulous persons a number of times.		
			answered	13
			skipped	21

**A public spaces protection order (PSPO) is designed to deal with a particular nuisance or problem in an area. The PSPO can impose restrictions on the use of that area which apply to everyone who is carrying out certain activities. To what extent do you support the use of a PSPO to prohibit street gambling and gaming in the area shown in the map above?**

		Response Percent	Response Total							
1	Strongly support		79.41% 27							
2	Support		11.76% 4							
3	Neither support nor oppose		5.88% 2							
4	Oppose		0.00% 0							
5	Strongly oppose		2.94% 1							
6	Don't know		0.00% 0							
<b>Statistics</b>	Minimum	1	Mean	1.35	Std. Deviation	0.84	Satisfaction Rate	7.06	answered	34
	Maximum	5	Variance	0.7	Std. Error	0.14			skipped	0

**Please tell us why you support the use of a PSPO in the area shown.**

		Response Percent	Response Total
1	Open-Ended Question	100.00%	30
1	<a href="#">04/11/2022 13:07 PM</a> <a href="#">ID: 203091761</a>	To enhance safety for tourists and residents	
2	<a href="#">04/11/2022 19:18 PM</a> <a href="#">ID: 203132393</a>	For some people it's a nuisance	
3	<a href="#">07/11/2022 10:32 AM</a> <a href="#">ID: 203227443</a>	To enhance the quality of life of visitors, residents and commuters. To prevent crime and anti-social behaviour.	
4	<a href="#">07/11/2022 11:10 AM</a> <a href="#">ID: 203231102</a>	If residents, working people and visitors are affected by this issue, it needs to be addressed. The streets of London are not appropriate places for such behaviour. They should be safe, clean and comfortable for everyone to use as public realm, in particular local residents and their families. Living Streets actively encourages people to walk as a form of travel - but they are far less likely to walk do this if they feel unsafe, uncomfortable or that the physical and social environment is deterring them. Therefore, there is a significant knock on impact from this issue which is hard to measure but will certainly be happening.	
5	<a href="#">08/11/2022 08:47 AM</a> <a href="#">ID: 203333470</a>	It is already illegal to street gamble, it is very intimidating to pass the gangs on the bridge ( Westminster) It is very upsetting to see tourists being exploited and in most cases encouraged to chase there losses.	
6	<a href="#">08/11/2022 08:59 AM</a> <a href="#">ID: 203338430</a>	An illegal activity.	
7	<a href="#">15/11/2022 17:19 PM</a> <a href="#">ID: 204060363</a>	To prevent this gambling activity taking place. too many tourists are targeted by these gangs for criminal purposes. i also worry	

Please tell us why you support the use of a PSPO in the area shown.

			Response Percent	Response Total
		that criminal gangs use modern day slaves as part of this activity		
8	<a href="#">18/11/2022 18:54 PM</a> <a href="#">ID: 204377200</a>	This is a beautiful touristic area and gamblers/gamers block a free flow of pedestrians on the bridge and surrounding streets		
9	<a href="#">18/11/2022 19:52 PM</a> <a href="#">ID: 204380425</a>	It needs to be considered a crime.		
10	<a href="#">18/11/2022 19:53 PM</a> <a href="#">ID: 204380453</a>	For all the reasons stated at the start of this document		
11	<a href="#">18/11/2022 19:56 PM</a> <a href="#">ID: 204380636</a>	This is not gambling - it is well organised small gangs tricking tourists and often vulnerable people out of their money		
12	<a href="#">18/11/2022 20:15 PM</a> <a href="#">ID: 204381749</a>	I don't approve of street gambling anywhere		
13	<a href="#">18/11/2022 20:29 PM</a> <a href="#">ID: 204381715</a>	I think is a very big problem Street gambling, expecially the one carried out by groups of gypsies or east Europeans people. These organised criminal groups are able to steal hundreds of pounds to Londoners but mostly to tourist which at the end get a negative perception of their trip to London. Please enforce the PSPO and also a big penalty for these groups of people. We want to see our city clean again as soon as possible given that there is much more crime in Westminster since few years. Thank you		
14	<a href="#">18/11/2022 20:33 PM</a> <a href="#">ID: 204382207</a>	It is an area frequented by tourists and young people with less experience of being cheated.		
15	<a href="#">18/11/2022 22:01 PM</a> <a href="#">ID: 204386288</a>	To address the issues raised aabove and to stamp out this criminal behavior		
16	<a href="#">18/11/2022 22:16 PM</a> <a href="#">ID: 204386898</a>	These thieves are ruining the tourist experience		
17	<a href="#">18/11/2022 23:28 PM</a> <a href="#">ID: 204388850</a>	It is a scam preying on the vulnerable and should be banned.		
18	<a href="#">19/11/2022 05:00 AM</a> <a href="#">ID: 204392072</a>	There seem to be other associated people around ready who move in to threaten punters should disagreement arise		
19	<a href="#">19/11/2022 07:11 AM</a> <a href="#">ID: 204393806</a>	It helps prevent the activity taking place however after a while the issue or proble ms return. Example the number of people sleeping on the streets by Lloyds bank on Edgware Road across from waitrose		
20	<a href="#">19/11/2022 08:29 AM</a> <a href="#">ID: 204395916</a>	Westminster needs to be cleaned up if all scammers, we host a large number of tourists in the city and we should be making them feel safe. The area shown is a start but should become a wider area taking over all areas they tourists use and stay.		
21	<a href="#">19/11/2022 13:37 PM</a> <a href="#">ID: 204413959</a>	Anything which prevents nuisance to the public is a good thing.		
22	<a href="#">19/11/2022 21:10 PM</a> <a href="#">ID: 204454281</a>	It is a con trick performed by professional criminals. It rips off tourists and naive visitors. Pickpocketing takes place. It obstructs the pavement and peoples progress.		

**Please tell us why you support the use of a PSPO in the area shown.**

			Response Percent	Response Total
23	<a href="#">19/11/2022 21:52 PM</a> <a href="#">ID: 204455967</a>	Street gambling is generally run by criminality. They prey on the weak in our society. It should be robustly dealt with heavy fines initially and prison for persistent offenders.		
24	<a href="#">20/11/2022 09:41 AM</a> <a href="#">ID: 204469760</a>	Big problem, makes London look awful, rips tourists off, stops Londoners getting around quickly		
25	<a href="#">20/11/2022 18:28 PM</a> <a href="#">ID: 204493790</a>	It blocks the pavement, making it slower to cross the bridges. It also looks to me like a trap for tourists, who are taken advantage of and sometimes lose sizeable sums of money. It's not good for our reputation as a tourist destination, particularly in such a world-renowned location.		
26	<a href="#">21/11/2022 18:19 PM</a> <a href="#">ID: 204584088</a>	You know why! They serve as a 'gateway' to London . . .		
27	<a href="#">21/11/2022 20:07 PM</a> <a href="#">ID: 204598511</a>	It will send a signal to others that they can be stopped from illegal activity and will provide a clear legal framework so officers can enforce without loopholes or challenges stopping them.		
28	<a href="#">21/11/2022 21:34 PM</a> <a href="#">ID: 204608385</a>	I have frequently seen gambling on Westminster Bridge and the surrounding area targeting tourists and the vulnerable and providing opportunities for pickpockets .		
29	<a href="#">22/11/2022 10:12 AM</a> <a href="#">ID: 204652588</a>	The area is not as safe as it once was.		
30	<a href="#">23/11/2022 12:05 PM</a> <a href="#">ID: 204897273</a>	Needed to stop tourists and visitors being ripped off, and to avoid arguments/fights		
			answered	30
			skipped	4

**Please tell us why you oppose the use of a PSPO in the area shown.**

		Response Percent	Response Total
1	Open-Ended Question	0.00%	0
		answered	0
		skipped	34

**Do you have any final comments regarding street gambling and gaming, or the use of a PSPO?**

		<b>Response Percent</b>	<b>Response Total</b>
<b>1</b>	<b>Open-Ended Question</b>	<b>100.00%</b>	<b>26</b>
1	<a href="#">04/11/2022 13:07 PM</a> <a href="#">ID: 203091761</a>	The area should be larger. I worry that these PSPOs will just shift the problem elsewhere	
2	<a href="#">04/11/2022 18:07 PM</a> <a href="#">ID: 203126443</a>	<p>I know it's easy to say but I suspect that it is the criminal gangs who are exploiting the street gamblers</p> <p>Sadly they are often unreachable and it is those who are already vulnerable being punished for the activities</p> <p>Can we support in other ways rather than using a PSPO?</p>	
3	<a href="#">04/11/2022 19:18 PM</a> <a href="#">ID: 203132393</a>	No	
4	<a href="#">06/11/2022 11:59 AM</a> <a href="#">ID: 203187266</a>	I don't know that we should ban gaming that doesn't involve gambling. Would like to make sure this order is properly targeted at removing behavior that is actively harmful to people. Certain types of gaming can be quite additive to the public realm (e.g. people playing Chess).	
5	<a href="#">07/11/2022 10:32 AM</a> <a href="#">ID: 203227443</a>	I support PSPO	
6	<a href="#">07/11/2022 11:10 AM</a> <a href="#">ID: 203231102</a>	It is an appropriate use of this power. The key will be actively enforcing it and being alert to the problem relocating.	
7	<a href="#">08/11/2022 08:47 AM</a> <a href="#">ID: 203333470</a>	Final comment is it should not allowed and people should be able to walk across the bridge without being accosted and feeling intimidated, and able to enjoy the views.	
8	<a href="#">15/11/2022 17:19 PM</a> <a href="#">ID: 204060363</a>	I am very supportive of the application.	
9	<a href="#">18/11/2022 19:52 PM</a> <a href="#">ID: 204380425</a>	I don't understand why the bridge area is the only designated area for this. Oxford street also should be considered.	
10	<a href="#">18/11/2022 19:53 PM</a> <a href="#">ID: 204380453</a>	People being publicly robbed and swindled doesn't do a lot for our tourist industry	
11	<a href="#">18/11/2022 19:56 PM</a> <a href="#">ID: 204380636</a>	It should be extended across all Westminster! If you want to gamble legally there are plenty of outlets you can use	
12	<a href="#">18/11/2022 20:29 PM</a> <a href="#">ID: 204381715</a>	Please enforce it	
13	<a href="#">18/11/2022 20:33 PM</a> <a href="#">ID: 204382207</a>	Please clean up the area and the criminal activities apparently going unchecked.	
14	<a href="#">18/11/2022 22:01 PM</a> <a href="#">ID: 204386288</a>	Do it!	
15	<a href="#">18/11/2022 23:28 PM</a> <a href="#">ID: 204388850</a>	Please, please take action.	
16	<a href="#">19/11/2022 05:00 AM</a> <a href="#">ID: 204392072</a>	Disturbs flow of people around them	
17	<a href="#">19/11/2022 07:11 AM</a> <a href="#">ID: 204393806</a>	It should not be allowed and needs to be tackled to prevent it taking place	

**Do you have any final comments regarding street gambling and gaming, or the use of a PSPO?**

			<b>Response Percent</b>	<b>Response Total</b>
18	<a href="#">19/11/2022 08:29 AM</a> <a href="#">ID: 204395916</a>	Please ensure a review is conducted, I feel that the scammers and gamblers will move outside the zone so they can continue		
19	<a href="#">19/11/2022 13:37 PM</a> <a href="#">ID: 204413959</a>	No		
20	<a href="#">19/11/2022 21:10 PM</a> <a href="#">ID: 204454281</a>	Ensure regular enforcement.		
21	<a href="#">19/11/2022 21:52 PM</a> <a href="#">ID: 204455967</a>	Already stated in number 7.		
22	<a href="#">20/11/2022 09:41 AM</a> <a href="#">ID: 204469760</a>	Finally! About time		
23	<a href="#">21/11/2022 18:19 PM</a> <a href="#">ID: 204584088</a>	This will only work if it is actually enforced. It needs more than a sign attached to a lamppost.		
24	<a href="#">21/11/2022 20:07 PM</a> <a href="#">ID: 204598511</a>	no		
25	<a href="#">21/11/2022 21:34 PM</a> <a href="#">ID: 204608385</a>	No		
26	<a href="#">22/11/2022 10:12 AM</a> <a href="#">ID: 204652588</a>	I feel the use of the PSPO can only help - as we don't want the problem spreading to other areas.		
			answered	26
			skipped	8