

London Borough of Hammersmith & Fulham

Report to: Licensing Committee

Date: 26 November 2020

Subject: Annual Licensing Committee Report April 2019 to March 2020

Report author: Lisa White and Adrian Overton

Responsible Director: Sharon Lea, Strategic Director of Environment

Summary

This report provides a summary update of the work and performance of the licensing team for the period between 1st April 2019 and 31st March 2020 and includes the following:

- a) A financial summary of the team's income and debt.
- b) An outline of the service improvement work undertaken in relation to online application forms, data integrity and improving procedures.
- c) An update on the current licensing policies in effect.
- d) The responsibilities of the team (contained in Appendix 1 attached to this report).
- e) Details of all licensing sub committees (contained in Appendix 2 attached to this report)
- f) Details of all current Appeals (Contained in Appendix 3 attached to this report)
- g) Details of complex cases (contained in Appendix 4 attached to this report).

An additional report has been attached to this report detailing how the Licensing Service has been operating throughout the COVID-19 pandemic at Appendix 5.

Recommendations

1. Appendix 3 and Appendix 4 are not for publication on the basis that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information) as set out in paragraph 3 of Schedule 12A of the Local Government Act 1972 (as amended).

2. That members of the Licensing Committee note the contents of this report and provide any comments.

Wards Affected: Not applicable.

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	The policies and strategies outlined in this report have been designed to promote responsible businesses and foster a shared prosperity across the borough. Any enforcement actions taken by the service can have a detrimental impact on businesses and as such we are always pragmatic with our enforcement powers in offering advice and guidance in the first instance to try and bring businesses back into compliance.
Creating a compassionate council	The service is compassionate to the needs of businesses and residents. The report (Appendix 5) details how we have assisted businesses through the Covid 19 pandemic to help struggling operators adapt to the new business environment.
Doing things with local residents, not to them	The report details the work of the licensing service this includes a reactive response to complaints from residents. Additionally, the team work closely with residents in relation to applications submitted and attend resident meetings when required.
Being ruthlessly financially efficient	This report for the first year, now includes a finance management section. This outlines the way the service is generating income and ruthlessly managing any debt. The report details how the team have added resource via volunteers and apprentices to the team to be financially efficient and reduce the cost of the service.
Taking pride in H&F	We strive to be best licensing authority in London and this report details the excellent work undertaken by the team to achieve this goal.
Rising to the challenge of the climate and ecological emergency	The report details the way the service has adapted due to the Covid-19 pandemic, this has reduced officer travel around the borough to visits, meetings and licensing hearings. We report the new way of working has many positives which the team would like to continue in the future.

Financial Impact

The total income generated from licencing activities during 2019/20 excluding recharges was £366k.

The amount of licensing debt reduced by 18% during 2019/20 from £20,410 in March 2019 to £16,690 by March 2020. There has been no movement in the bad debt provision.

Implications verified by Sukvinder Kalsi, Head of Finance, Environmental Department.

Legal Implications

There are no legal implications arising from the body of this report.

Implications verified by Adesuwa Omoregie, Head of Law.

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Background Papers Used in Preparing This Report

None

DETAILED ANALYSIS

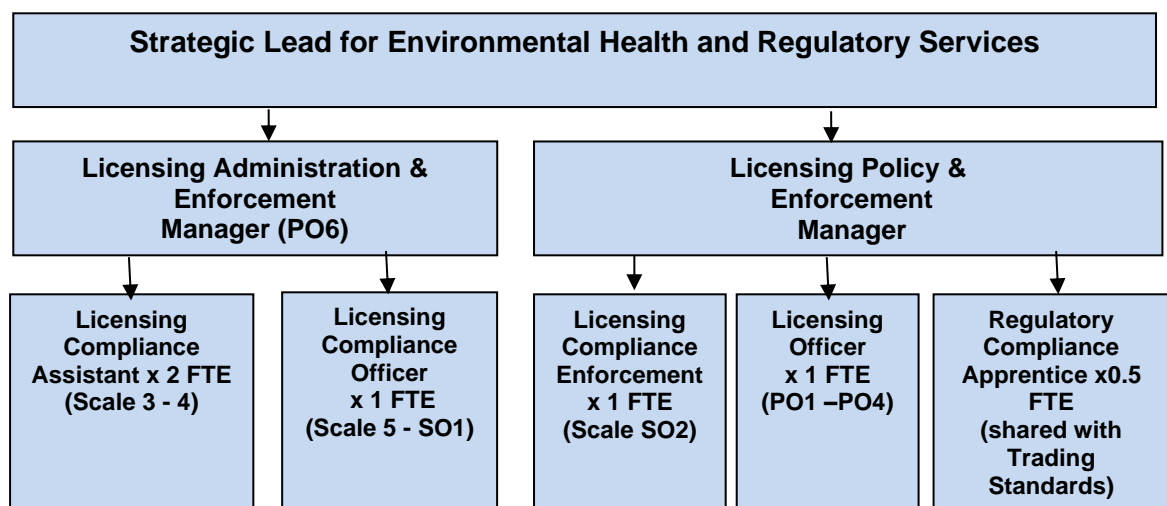
Introduction

1. The Licensing Service covers a wide range of statutory licensing, registration and enforcement functions in the London Borough of Hammersmith & Fulham. These functions cover premises which sell and supply alcohol or provide regulated entertainment or late-night refreshment. We also issue licences for gambling premises, gaming machines and lotteries, sex establishments and sexual entertainment venues, film classification; and scrap metal dealers.
2. The service manages its own finances which includes invoicing businesses, taking payments, chasing and enforcing non-payment of annual fees for all licensed premises.
3. The Licensing Service works in partnership with others including responsible authorities, blue light services, government departments, residents and businesses to promote the licensing objectives, improve public health, reduce crime and disorder and promote a safe and enjoyable night time economy in the Borough whilst ensuring that it is fulfilling its functions efficiently.

Report

Staffing /Team Structure

4. Since last year there have been some interim changes across the team to ensure continued resilience, responsiveness and effectiveness of the service. The current team structure is shown below:



5. Within the last year, two members of the team who started as volunteers have been recruited on permanent contracts into the vacant posts that they were covering, (1 x Licensing Compliance Assistant and 1 x Licensing Compliance Officer).

6. Additionally, we share a Regulatory Compliance Apprentice with the Trading Standards team and have recently engaged another volunteer to assist with administration and some enforcement support.
7. The Licensing officer within the team is currently on maternity leave and as a result we have a new officer for a one-year secondment via the Council's Get Ahead scheme. This will allow the Licensing Compliance Enforcement Officer to progress into a more senior role for one year. The roles and responsibilities of all the team members can be seen in Appendix 1 attached to this report.
8. The service encourages and is committed to supporting internal career progression and development. With a small team and high service demands, managers have used a range of staffing options to keep within budget, in an effort to be ruthlessly financially efficient.
9. It has become apparent that managing the administration and finance strand of the team requires a minimum of one FTE and therefore only a limited amount of one manager's time can be spent on operational enforcement duties.

Team performance, work activity and key achievements in 2019/20

Licensing Act 2003

10. The Authority has a statutory duty to carry out its function with a view to promoting the four licensing objectives. These are:
 - The prevention of crime and disorder;
 - Public safety;
 - The prevention of public nuisance; and
 - The protection of children from harm
11. The work of the Licensing Team involves policy implementation, processing, inspection, enforcement, finance management, preparing reports for licensing sub-committee and service improvement.
12. The authority currently has 846 licensed premises and had granted 3573 authorisations for personal licence holders under the Licensing Act 2003. Tables 1 – 9 below illustrate the Licensing Authority's performance during 2019/20. Data from 2018/19 has been included for comparison purposes.

Applications

13. Table 1 below details the types of applications/notifications processed by the team.

Table 1: Licence/authorisation type	No. of applications received	
	2018/2019	2019/2020
New premises licence applications	58	49
New personal licence applications	197	169
Premises licence full variation applications	23	24
Premises licence minor variation applications	58	43
Designated premises supervisor (DPS) variations applications	217	215
Transfers of premises licences applications	55	56
Notification of change of name and/or address, lost licence, DPS removals, interested party notification, condition extensions.	161	204
Temporary event notices (TENs) / Late temporary event notices	529	822
Total number of applications processed by the team	1298	1582

14. Overall in 2019/20, the service dealt with a total of 1582 applications/notifications under the Licensing Act 2003 compared to 1298 in 2018/2019 which is an **increase of 22%**.
15. This increase was from April 2019 to January 2020. In February and March 2020 applications reduced due to the COVID 19 pandemic.

Gambling Act 2005

16. The Authority has a statutory duty to carry out functions with a view to promoting the licensing objectives under this legislation. These are:
 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
 - Ensuring that gambling is conducted in a fair and open way; and
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
17. The team issues premises licences for the following; bingo halls, betting shops, adult gaming centres, family entertainment centres and track betting. In addition, the team processes notifications for small society lotteries and gaming machine permits.

Applications

18. Table 2 below details the types of gambling premises in the borough.

Table 2: Types of gambling premises	Total	
	2018/19	2019/20
Adult Gaming Centres	2	3
Betting Shops/ Track Betting	42	26
Bingo	3	3
Total	47	32

19. The data in table 2 shows there has been a decrease in betting shops from 42 to 26 in 2019/20 this is a **decrease of 38%**. The reduction was due to operators voluntarily surrendering their licences. One high street operator surrendered 12 licences held across the borough within this period.
20. In addition to the above there are 105 active permits and small society lottery authorisations in effect.

Sub Committee Hearings under the Licensing Act 2003

21. Where a representation is made to an application or a review application is submitted a sub-committee is arranged.
22. In 2019/20 a total of 24 licensing sub-committee hearings were organised compared to 25 for 2018/2019. A breakdown is provided below.
23. The table 3 below illustrates the total number of sub committees.

Table 3: Total number of Licensing Sub Committee hearings organised	2018/2019	2019/2020
New Premises Licence	11	10
Variation of a Premises Licence	3	9
Temporary Event Notice	0	1
Review Applications	4	4
Total	18	24

24. A summary of the decisions made by the licensing sub-committee (excluding reviews) can be seen in Table 4 below:

Table 4: Licensing Sub Committee outcomes new and variations	2018/2019	2019/2020
Granted/Agreed	3	1
Agreed in part	8	10
Refused	3	0
Disposed / Adjourned*	6	9*
Total	14	20

*Includes the one Temporary Event Notice.

25. A summary of the decisions made by the licensing sub-committee for **review** applications can be seen in Table 5 below:

Table 5: Licensing review applications and outcomes	2018/2019	2019/2020
No action	0	0
Modify conditions	2	4
Remove DPS	0	0
Exclude licensable activity	0	0
Licence suspended	1*	0
Licence revoked	3	0
Total	5	4

*These premises also had their licence conditions modified

26. In the last year all four reviews were submitted by the Metropolitan Police on the grounds of prevention of crime and disorder and the prevention of public nuisance. All four licences had their conditions modified by committee.
27. There were no other sub-committee hearings in 2019/20 under the Licensing Act 2003. A full report on all applications that went to Sub-Committee has been produced by Committee Services and can be seen at Appendix 2.

Appeals

28. Appeals against the decision of the Licensing Sub-Committee can be brought by a number of parties involved in the application and licensing process e.g. the applicant, responsible authorities and other persons who have objected, or a licence holder in the case of reviews. This area of work can take up a considerable amount of time and it is therefore important that the service monitors this work in light of the decisions made and the facts of each case. There can also be substantial financial implications for appeals in terms of legal fees when defending decisions of the Council.

29. There were five appeals lodged against the decisions of the licensing committee in 2019/2020 as opposed to four in 2018/2019. Appeals lodged in 2019/20. A full report on all current Appeals can be seen as Appendix 3.

Finance Management

30. Financial management is a substantial amount of the team's work. The licensing team generates income from a number of sources including application fees, annual fees, pre-application advice and costs awarded following Appeals or legal action. In addition to managing and overseeing all financial transactions, reconciliation of payments made is crucial to allow officers to suspend premises licences for non-payment of fees and to take enforcement action.

Income 2019/2020

31. Table 6 below outlines the income received by the service for the period 2019/2020

Table 6. Income generated	Suspension letters issued
Annual fees	£251,749
Application fees	£103,208
Cost recovery - Appeals, legal cases	£10,000
Pre-Application advice fees	£1376
Total Income	£366,333

Zero Based Budgeting

32. The Licensing Service recently underwent an extensive Zero Based Budgeting review in 2019. This review showed that the vast majority of our work is a statutory function and that we offer excellent value for money compared to other local authorities with a comparable number of licensed premises. It was also shown that the team operates above capacity, delivering an effective, safe service to local businesses. We currently offer chargeable pre application advice which costs from £120-£1500. One of the recommendations was for the uptake for this service to be enhanced with targeted advertising including making the scheme more prominent on the Council's website. In addition, an opportunity was identified to introduce a separate chargeable application checking service. This would improve the quality of applications and lead to more efficient processing as well as providing another income stream. Based on the assumption that there would be a 25% uptake in a £60 pre application checking service, this scheme is likely to generate £17,100+ annually.

Finance Projects undertaken by the team

33. The below details the finance projects undertaken by the team in 2019/20
- **Coding** - All income is reconciled by the team; this is carried out by integrating a number of finance platforms to ensure all fees are allocated to the team's budget

account. The team has worked closely with finance this year to set up new finance codes so reporting can be undertaken on the different income streams. This ensures all the services income can be accounted for, this was previously not available.

- **Recovery of costs - Appeals and Enforcement** a new process has been implemented to maximise the costs recovered following an Appeal or legal action. This involves contacting the Appellant immediately after an Appeal is submitted advising that with immediate effect any costs will be recoverable by the Council if the Appeal is either withdrawn or upheld by the Magistrates Court. This process has resulted in the successful collection of costs over the last year.
- **Full application cost recovery** – a substantial project was undertaken during 2019/2020 to enable full cost recovery for all licence fees and charges for Gambling, Sex Establishments and Scrap Metal licences and notifications, Fees were calculated by evaluating every process involved in the processing of an application, the percentage of time spent by officers and the officer hourly rate. The calculation then established the true cost for processing each application. This calculation has been used for all applications and notifications, so it is as precise as possible. This project demonstrated that currently the majority of our fees would need to be adjusted to allow for full cost recovery.

The majority of our income is from Licensing Act fees. The amount that we can charge for these applications and notifications is set in law. Currently the cost of processing any application under the Licensing Act is substantially more than we are legally allowed to charge. The service will continue to raise this issue at relevant forums and in consultation responses to encourage central government to implement locally set fees.

Pre-application advice

34. Since 2015 the Licensing Team has offered a pre-application advice service for small, medium, large licence applications and extra-large events. Table 7 below illustrates the number of requests where Licensing Officers have provided pre-application advice. In 2019/2020 this generated £1376 in income.

Table 7: Licensing Pre-Application Advice	2018/2019	2019/2020
Small	2	3
Medium	3	4
Large	0	1
Extra-large events	1	1
Total	6	9

35. Officers will look to seek full cost recovery for pre-application advice for larger events. With that being said, the pre-application advice service still represents good value for money. It enables businesses to seek professional advice on how

to apply for a licence at a substantially reduced cost to that of a licensing agent/solicitor.

36. The team will continue to promote the pre-application advice service in 2020/21 to support local businesses, whilst ensuring that we cover officers' staffing costs of providing this service.

Debt Management

37. The current debt as of 31 March 2020 was £16,690 with only £1660 being over 2 years old. Historically, our debt exceeded £250,000. Now the service ensures debt management is a priority and this is reflected in the total debt owed and the age of the debt. Officers will make a friendly call to operators if a fee is owed. The service has found that this type of contact has resulted in a higher percentage of payments compared to just sending standard debt letters. We have also offered free pre application advice in some circumstances on the agreement that outstanding fees are paid once a transfer application is made.
38. However, despite the team's best efforts there are some fees which do remain unpaid. In accordance with the Licensing Act 2003 if a licence holder fails to pay their annual fee a suspension letter is issued. If a payment is still not received the licence is subsequently suspended. In 2019/20 there were 239 suspension letters issued by the team and consequently **36 licences are currently suspended**.

Table 8: Suspensions of premises licences	Suspension letters sent
2018/19	289
2019/20	279

39. Once a licence is suspended the enforcement officers will contact and visit the premises to see if the premises are still operating and providing licensable activities and if so, collect the outstanding debt or advise to cease providing activities. Additionally, officers will issue a notice to the premises explaining that their licence will be reviewed unless they either cease licensable activities or pay the annual fee.

Inspection and Enforcement

Table 9: Inspection and Enforcement	Total Number	
	2018/19	2019/20
Number of visits to businesses	299	292
Number of complaints received / investigated	303	275
Number of risk assessments undertaken	46	59
Number of investigations commenced	33	47
Number of S19 Closure Notices	2	0
Simple Cautions	0	2*
Appeals Lodged	4	5

* Simple Cautions currently being drafted

40. Table 9 above illustrates that 2019/20 was busier than 2018/19 (this is without the extra impact of COVID 19). Officers act on intelligence from Responsible Authorities and complaints that are received. There is an increased focus on working with licence holders to support and help them to comply with the law rather than prosecution. We have also continued to submit reviews as the Licensing Authority, where we find serious issues with non-compliance.
41. The above table does not include complaints relating to COVID 19 non-compliance. These complaints are detailed in Appendix 5 of this report.
42. The enforcement team investigates a wide range of complaints from numerous sources, such as residents, councillors, businesses, internal departments or external authorities and government departments. Additionally, officers are actively involved in working with the police following violent incidents or disorder in or in the immediate vicinity of a licensed premises. This partnership working has been highly effective in tackling crime and disorder in and around licensed premises. This collaborative approach to enforcement is well highlighted in a fortnightly Licensing Action Group meeting (LAG) which all responsible authorities are invited to attend.
43. The approach by the team is to work with licensed premises to bring the operator into compliance. However, if there is continuous non-compliance, officers have a range of enforcement powers which they can use to deal with contraventions.
44. A risk assessment system is in effect, this enables premises to be risk assessed based on a number of factors. If a business is assessed as high risk, officers will inspect on a 6-12 monthly basis. If a business is a low risk they will not be inspected unless a complaint is received. This ensures that the service's resources are targeted at premises that have the potential to cause the most risk or harm.
45. Both licensing managers are responsible for dealing with premises which are of a complex nature, this could be due to the type of complaints, the number of complaints or if the complaints cover a range of issues dealt with by a number of teams across the Authority. Officers are continuously trying to balance the right of a premises to operate whilst ensuring that they do not adversely impact on the local area. In addition to this we are conscious of need to manage expectations of complainants, in terms of the level and quality of evidence which is needed before enforcement action can be taken. The complex premises are outlined in Appendix 4 of this report.

Service Improvements

46. The service changes which were implemented as a result of the Covid-19 pandemic can be seen in Appendix 5.

On-line application forms

47. Our Licensing Officer has continued working on improving and producing online application forms, following the closure of 'My Account'. Work is on-going to design and implement further forms, however this work removes one officer from the team for long periods of time to concentrate on the design and implementation work. This project will continue throughout 2020/21.

Data Integrity

48. Data integrity is a continuous project within the team, we have continued to review and improve the recording and management of application and licence data held on the department's licensing database (Uniform) and document management system. Currently there are over 20 reports which are run and managed weekly. The reports identify errors or issues with the data in uniform or our finance management processes.
49. In addition, some service improvement projects for 2019/2020 included:
- The reviewing of data integrity reports adding additional reports to identify errors within the database.
 - Downloading over 1000 photographs of personal licence holders so they are linked directly to the database, in accordance with data protection.
 - Updating invoice contacts for all licensed premises to ensure the correct contact is invoiced for annual fee payments.
 - Change of address notifications – report identified addresses which had not been correctly updated. All incorrect records were amended.
 - Reduce the number of incomplete licences issued and continuous service improvement work on the licensing database.

Licensing Procedures

50. A project was undertaken to improve and update the procedures in place for processing the numerous types of licence applications, raising invoices and preparing for committees. All members of the team have been actively involved in this process.

Policy Update

Statement of Licensing Policy

51. The Licensing Act 2003 ("The 2003 Act") requires every Council to have a 'Statement of Licensing Policy' ("SLP") which will include information stipulated within the Secretary of State's Statutory Guidance to Licensing Authorities in England and Wales, as amended from time to time.
52. The Council's SLP provides advice and guidance to the Licensing Authority when exercising its statutory functions as a Licensing Authority under the 2003 Act.

The SLP is an essential tool to assist Responsible Authorities (mainly regulators) and the Licensing Committee during the decision-making process to ensure that those decisions reached are sound and robust enough to withstand an appeal or judicial challenge. It also provides guidance to both applicants, objectors and professional advisers, and provides key information to the magistrates' courts hearing appeals against licensing decisions.

53. The 2003 Act also requires that the Council's SLP be reviewed via public consultation, formally adopted and published every five years. The latest version of our SLP was published in June 2017 and is next due to be reviewed in 2021/22 and by July 2022 at the latest.
54. A link to the current policy can be found on the council website at: https://www.lbhf.gov.uk/sites/default/files/section_attachments/statement_of_licensing_policy_2017_-_2022.pdf

Statement of Gambling Policy

55. The Gambling Act 2005 became effective in 2007 and Hammersmith & Fulham published its Statement of Gambling Policy in January of that year. Under the act, licensing authorities are required to review, amend and consult on their Statement of Gambling Policy at the end of every three-year period. Accordingly, an amended version of the policy was published in January 2010, and again in 2013, 2016 and 2018.
56. In accordance with section 349 of the Gambling Act 2005, Hammersmith & Fulham Council carried out its 3-year review of its Statement of Gambling Policy which was published on the 7 December 2018 and came into effect on the 4 January 2019.
57. A link to the current policy can be found on the council website at: https://www.lbhf.gov.uk/sites/default/files/section_attachments/statement_of_gambling_policy_2019_-_2022_hf.pdf

Cumulative Impact Assessments (CIAs) – Fulham and Shepherds Bush

58. The two CIAs in the borough were introduced in 2009 (Fulham) and 2011 (Shepherd's Bush) and as such the evidence for the assessments will need to be renewed before 6th April 2021. This deadline was introduced when the Police and Crime Act came into force in April 2018 and included a requirement that any such assessments should be renewed three years from the date the legislation came into effect.
59. The evidence gathering for the policies was due to start early this year however the current pandemic means we are currently unable to gather any meaningful evidence, and this will probably be the case until the summer next year.
60. With this in mind it is proposed that after both CIAs expire in April next year, officers will carry out a study in the summer 2021 to introduce new CIAs later in

2021. Whilst this is happening officers can still refer to cumulative impact if required, although we wouldn't have the benefit of the evidence from the studies.

Enforcement Policy

61. The Licensing Team is responsible for carrying out duties for various different licensing functions, including enforcement. When carrying out enforcement duties within the borough licensing officers must have due regard to the Regulators' Code, which places a number of obligations on local authorities. A link to the Regulators Code can be found here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/913510/14-705-regulators-code.pdf
62. These include taking a consistent approach to enforcement and being proportionate in response to any licensing breaches. To achieve this, we have adopted an enforcement policy which sets out our general approach to enforcement. A link to the current policy can be found on the councils website at: https://www.lbhf.gov.uk/sites/default/files/section_attachments/environmental_health_and_regulatory_services_enforcement_policy_-_september_2020.pdf

Priorities for the next 12 months (in addition to the Council's Statutory duties under the Licensing Act 2003, Gambling Act and other licensing legislation)

63. The services key priorities remain the same, however due to the COVID 19 pandemic the service has had to adapt at speed, with some priorities currently not being achieved. The service has taken a key role in the enforcement of Coronavirus legislation, being the only department to issue fixed penalty notices and apply for revocation of a licence for COVID 19 offences. Our main priority will continue to be enforcing COVID 19 non-compliance, assisting businesses as they adapt to a post COVID environment and to continue operating and managing the debt by working with operators to keep the debt at the absolute minimum. Further details can be found in Appendix 5 of this report.
64. The key priorities for the Licensing Team in 2020/21 (prior to COVID 19) are as follows:
 - a) To respond to public complaints, councillor complaints and other requests for service and investigate within service standards
 - b) Help to support the night-time economy in our town centres in a way that is sensitive to local residents and enhances the borough as a destination for inward investment.
 - c) To inspect all high-risk premises and ensure that all licensed and gambling premises operating in the Borough are operating in accordance with their licence and the respective Licensing Policy.
 - d) Ensure that the licensing team operates in a manner that maximises income by the invoicing of annual fees and maintains systems to identify non-payment of fees and take the appropriate enforcement action.

- e) Working in partnership with other Responsible Authorities and key stakeholders to promote the four licensing objectives through a number of ways including the Licensing Action Group (LAG).
- f) To improve engagement with residents, clients and businesses and develop a team culture of continuous improvement.
- g) To implement streamlined operating systems to be able to quickly respond to future changes in licensing laws, with minimal service disruption.
- h) Support and promote initiatives to protect vulnerable persons using licensed premises in H&F.
- i) To continue to promote the pre-application advice service to assist businesses and increase income and identify other forms of income for the service.
- j) To continue to improve our online application service for businesses and to reduce paper within the service.
- k) To conduct multi agency inspections with partners, i.e. Police, Gambling Commission, Security Industry Authority (SIA), H.M Customs and Revenue, UK Border Agency, Trading Standards, and Environmental Health, in relation to:
 - Late night inspections;
 - Underage alcohol sales;
 - License conditions check;
 - Sales of illegal alcohol;
 - Employment of illegal workers; and
 - Gambling premises inspections.
- l) Work in conjunction with the Council's waste service to promote the reduction of single use plastic in licensed premises, targeting the three football clubs and any large events held within the Borough – Polo, boat race etc.
- m) Partnership working with the Police and other agencies such as Barnardos to carry out further Child Sexual Exploitation (CSE) visits at licensed premises.
- n) Reduce the number of incomplete licences issued and continuous service improvement work on the licensing database.

Equality Implications

- 65. The Council, when taking decisions in relation to any of its functions, must comply with its public sector equality duty as set out in s149 of the Equality Act 2010 (the Act). Enhanced monitoring of our enforcement actions, to better inform future equalities impact assessments, will be carried out on to help us improve service delivery. Our enforcement policy has been reviewed, updated and strengthened to outline our commitment to equality for all and our intended actions to achieve this goal and follow good practice.
- 66. Our enforcement policy contributes towards the corporate priorities of the council and open and transparent decision making

Risk Management Implications

- 67. The Failure to meet new and existing statutory requirements is specifically addressed in the Environmental Health and Regulatory Services' risk register. Controls are in place to mitigate this risk include; training, internal auditing,

periodic updates of the scheme of delegation, performance monitoring and the business planning process

Other Implications

Procurement

Not Applicable

Consultation

Not Applicable

List of Appendices:

Appendix 1 - Roles and responsibilities of the Licensing Team

Appendix 2 - Details of the Licensing Sub Committees

Appendix 3 – Details of Appeals

Appendix 4 – Details of complex cases

Appendix 5 - COVID 19 service update