

London Borough of Hammersmith & Fulham

Report to: Licensing Committee

Date: 26 October 2021

Subject: Annual Licensing Committee Report April 2020 to March 2021

Report author: Lisa White and Adrian Overton

Responsible Director: Sharon Lea, Strategic Director of Environment

Summary

This report provides a summary of the work and performance of the licensing team for the period between 1st April 2020 and 31st March 2021 and includes the following:

- a) A Covid-19 service update.
- b) Team performance, work activity and key achievements in 2020/21.
- c) A financial summary of the team's income and debt.
- d) An update on the current licensing policies in effect.
- e) Details of all licensing sub committees (contained in Appendix 1 attached to this report)
- f) Details of all current appeals (Contained in Appendix 2 attached to this report)
- g) Details of complex cases (contained in Appendix 3 attached to this report).

Recommendations

1. Appendix 2 and Appendix 3 are not for publication on the basis that it contains information relating to the financial or business affairs of any particular person (including the authority holding that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: All.

Our Values	Summary of how this report aligns to the H&F Values
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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 by offering advice and guidance in the first instance by trying to bring businesses back into compliance.
Creating a compassionate council	The service is compassionate to the needs of businesses and residents. The report 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 which includes a reactive response to complaints from residents. Additionally, the team works closely with residents in relation to applications submitted and attends residents' meetings, as required.
Being ruthlessly financially efficient	This report includes a finance management section, this outlines the way the service is generating income and ruthlessly managing any debt.
Taking pride in H&F	We strive to be the 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 the amount officers travel around the borough on visits, meetings and licensing hearings. This new way of working has many positives which the team would like to continue in the future.

Financial Impact

The total income generated from licensing activities including Fixed Penalty Notices during 2020/21 excluding recharges to other Council departments was £307,900. This is a decrease of £58,433 compared to 2019/20.

The impact of the Covid-19 pandemic resulted in a loss of income mainly in small application fees of £75,000. The loss of income has been fully recovered from MHCLG Grant.

The amount of licensing debt as of 1 April 2021 was £18,215. Compared to March 2020 licensing debts of £11,775, this is an increase of 5%.

Implications verified by Kellie Gooch, Head of finance – the environment.

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 emergency 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

Covid 19 service update

4. Covid-19 created an unprecedented challenge for the Licensing Service. We have needed to reassess all of our processes so we can continue to provide our statutory duties whilst providing increased levels of enforcement activity to a level not seen before. One of our new service priorities has been to proactively help businesses navigate new laws in order to help them survive.
5. When lockdown occurred in March 2020 all officers in the Licensing Service were requested to work from home with immediate effect, with only one person visiting the office occasionally to bank cheques and check for post.
6. The enforcement side of the service continued to operate during the pandemic and took responsibility for issuing fixed penalty notices for Covid legislation breaches. Officers would also routinely undertake visits to the borough to ensure that the lockdown rules for hospitality premises were being complied with.
7. Over the last year we have adapted our processes and created new procedures for administration, enforcement and finance management. Second screens and additional equipment have been provided where necessary and our systems are now working effectively carrying out an almost purely digital service.
8. The only service which is not yet fully digital is issuing personal licences to personal licence holders - this requires a specific printer located in the office. To date we have approximately 146 outstanding photocard licences to issue.
9. Since March 2020 we still receive a small percentage of paper applications and cheques which are scanned by the officer who attends the office, however where possible we always promote our online services.

How we helped our licensed operators

10. The service has tried to be imaginative with how we assist businesses throughout the pandemic. With government legislation and guidance changing continuously, our advice and guidance to businesses has also been constantly reassessed. The points below outline some of the measures implemented by the service:
 - Provided a free pre application service for up to one hour.
 - Paused providing our new licence application checking service
 - Promoting a payment plan option to businesses so they can still trade and pay for their annual fee in monthly instalments.

- Permitted a simplified application process (minor variation) to allow off sales to be added to a licence. However, this amendment was time limited so it was only effective whilst the Coronavirus legislation was in place. Primary legislation was introduced shortly after this decision was made which permitted all premises with an on sales licence to offer off sales as well.
- Officers have been actively involved in the outside space project to promote the use of any outside local space for trading.
- Our enforcement team are taking a pragmatic approach to the enforcement of licensed premises conditions unless the breach is in relation to Covid 19 non-compliance or could cause harm to public health or safety.
- Providing regular updates to our licensed premises on the changes in legislation and government guidance.

An outline of the covid 19 enforcement work undertaken can be seen in paragraph 45 of this report.

Team performance, work activity and key achievements in 2020/21

Licensing Act 2003

11. 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
12. The work of the Licensing Team involves policy implementation, processing, inspection, enforcement, finance management, preparing reports for licensing sub-committee and service improvement.
13. The authority currently has 951 licensed premises (this includes alcohol, gambling, sex establishments and scrap metal premises) and had granted 3687 authorisations for personal licence holders under the Licensing Act 2003. Tables 1 – 9 below illustrate the Licensing Authority's performance during 2020/21. Data from 2019/20 has been included for comparison purposes.

Applications

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

Table 1: Licence/authorisation type	No. of applications received	
	2019/2020	2020/2021

New premises licence applications	49	85
New personal licence applications	169	114
Premises licence full variation applications	24	28
Premises licence minor variation applications	43	29
Designated premises supervisor (DPS) variations applications	215	131
Transfers of premises licences applications	56	64
Notification of change of name and/or address, lost licence, DPS removals, interested party notification and condition extensions	204	134
Temporary event notices (TENs), Late temporary event notices.	822	171
Total number of applications processed by the team	1582	756

15. Overall in 2019/20, the service dealt with a total of 756 applications/notifications under the Licensing Act 2003 compared to 1582 in 2019/2020. This is a reduction of 53%.
16. The reason for this decrease was due to a substantial reduction in Temporary Event Notices (TENs) being submitted - 822 in 2019/20 compared to 171 in 2020/21. The reduction in TENs was due to the covid pandemic, and covid restrictions, where events were not being held or applied for in the Borough.
17. Although the service was less busy with TENs (which are formal notifications rather than applications), we did see a significant increase in new premises licence applications - over 41%. New premises licence applications are significantly more complex than TENs and take a considerable amount of time to administer, often resulting in a licensing sub-committee.

Gambling Act 2005

18. 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.
19. 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

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

Table 2: Types of gambling premises	Total	
	2019/20	2020/21
Adult Gaming Centres	3	3
Betting Shops/ Track Betting	26	24
Bingo	3	3
Total	32	30

21. The data in table 2 shows there has been a slight decrease in betting shops from 26 in 2019/20 to 24 in 2020/21.
22. In addition to the above there are 121 active permits and small society lottery authorisations in effect.

Licensing Sub Committee Hearings

23. Where a representation is made to an application, or a review application is submitted, a sub-committee is arranged to reach a decision.
24. In 2020/21 a total of 19 licensing sub-committee hearings were organised compared to 25 for 2019/2020. A breakdown is provided below. 18 of the hearings were to consider premises under the Licensing Act 2003. 1 application heard was for the renewal of the Sexual Entertainment Venue (SEV) premises under the Local Government Miscellaneous Provisions Act 1982.
25. Table 3 below illustrates the total number of sub committees.

Table 3: Total number of Licensing Sub Committee hearings organised	2019/2020	2020/2021
New Premises Licence	10	10
Variation of a Premises Licence	9	3
Temporary Event Notice	1	0
Review Applications	4	5
Renewal of SEV licence	1	1
Total	25	19

26. 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, variations and renewals	2019/2020	2020/2021
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Granted/Agreed	1	1
Agreed in part	10	8
Refused	0	3
Disposed / Adjourned*	9*	2
Total	20	14

*Includes the one Temporary Event Notice.

27. 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	2019/2020	2020/2021
No action	0	0
Modify conditions	4	1
Remove DPS	0	0
Exclude licensable activity	0	0
Licence suspended	0	0
Licence revoked	0	2
Disposed/Postponed	0	2
Total	4	5

28. Two of the reviews were submitted by the Licensing Authority - further details can be seen in Appendix 3. The third review was submitted by the Metropolitan Police on the grounds of the prevention of crime and disorder and the prevention of public nuisance.

Appeals

29. 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.
30. There was one appeal lodged against the decisions of the licensing committee in 2020/2021 as opposed to five in 2019/2020. A full report on all current Appeals can be seen at Appendix 2.

Finance Management

31. Financial management takes up a substantial amount of the team's time. 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 is crucial in allowing officers to suspend premises licences for non-payment of fees, and to take enforcement action where necessary.

Income 2020/2021

32. Table 6 below outlines the income received by the service for the period 2020/2021

Table 6: Income generated	2019/2020	2020/2021
Annual fees	£251,749	£245,827
Application fees	£103,208	£57,851
Covid 19 Fixed Penalty Notices	n/a	£3166
Pre-Application advice fees	£1376	£1056
Cost recovery - Appeals, legal cases	£10,000	£0
Total Income	£366,333	307,900

33. Covid 19 significantly affected the licensing team's income mainly due to the substantial decrease in Temporary Event Notifications. The biggest drop was seen during the first lock down period. Applications gradually increased as the year progressed. Although applications initially reduced, we also found a steep rise in advice and application queries where businesses wanted to diversify their operation as a result of the lockdown restrictions.

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 2020/2021 this generated £1,056 in income.

Table 7: Licensing Pre-Application Advice	2019/2020	2020/2021
Small	3	7
Medium	4	2
Large	1	0
Extra-large events	1	0
Total	9	9

35. 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 2021/22 to support local businesses, whilst ensuring that we cover officers' staffing costs when providing this service.

Debt Management

37. The current debt as of 31 March 2021 was £18,215. The service ensures debt management is a priority and this is reflected in the total debt owed and the age of the debt. Our policy is that officers will initially make a friendly call to operators if a fee is owed. The service has found that this type of early contact has resulted in a higher percentage of payments compared to writing debt letters without any personal engagement.
38. However, despite the team's best efforts there are some fees which 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 2020/21 there were 228 suspension letters issued by the team and consequently **27 licences are currently suspended.**

	Table 8: Suspensions of premises licences	Suspension letters sent
39.	2019/20	279
On	2020/21	228

ce a licence is suspended our enforcement officers will contact and visit the premises to see if the business is still operating and providing licensable activities and if so, collect the outstanding debt or advise them 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

40. 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.

41. Table 9 below details the enforcement action taken during the 2020/21 period.

Table 9: Inspection and Enforcement	Output	Total 2020/21
Licensing visits	Number of visits to a premises including checking for Covid compliance, monitoring and test purchases.	341
Covid 19 inspections	Number of premises visited and full Covid secure inspection undertaken	392
Covid 19 Prohibition Notices	Number of PNs issued for Covid contraventions	4
Fixed Penalty Notices	Number of FPNs issued for Covid contraventions	4
Warning letters issued	Number of warning letters issued for breaches of licence	30

42. Table 9 above illustrates that during 2020/21 the team were predominantly focused on covid compliance visits and inspections. Our strategy has continually altered depending on the restrictions and legislation introduced by central government. This has been particularly challenging due to the sheer number of complex legislative changes which have taken place, often with no prior warning.
43. 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.
44. The Licensing Service co-ordinated several multi agency visits, during this period. The purpose of the visits was to try and quickly identify any premises which were taking little or no Covid-19 measures and to offer advice in the first instance.
45. During the pandemic local authorities were given the authority to issue fixed penalty notices (FPNs) for Covid non-compliance. These notices streamlined our enforcement actions as we were able to issue fines to gain compliance,

rather than having to pursue lengthy and costly legal proceedings - please see the Jack's case outlined in Appendix 3 for an example of this problem. Since these powers were introduced the licensing service has issued three FPN's totalling £3,000.

46. Prior to the pandemic, officers would regularly undertake risk assessments of licensed premises. This was put on hold during this period whilst we investigated non covid compliance complaints.

Service Improvements

47. The main area of service improvement work during this period was relating to the Covid 19 response and amending our processes and procedures to enable the service operating an electronic service.

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.

Policy Update

Statement of Licensing Policy

49. The Licensing Act 2003 ("The 2003 Act") requires every Council to have a 'Statement of Licensing Policy' ("SLP") which will include information outlined in the Secretary of State's Statutory Guidance to Licensing Authorities in England and Wales, as amended from time to time.
50. 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 the 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 for any magistrates' court appeals against licensing decisions.
51. 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 by July 2022 at the latest. 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](https://www.lbhf.gov.uk/sites/default/files/section_attachments/statement_of_licensing_policy_2017_-_2022.pdf)

52. The Licensing team is currently planning for the forthcoming renewal and revision of the existing policy before the July 2022 deadline. The timetable below outlines the current schedule to ensure that a fully consulted and revised SLP is ready to be taken to a Full Council meeting in May 2022.

Licensing Policy (expires 4th July 2022)

- 31st January 2022 – start of 12 week consultation.
 - 21st March 2022 - Community Safety and Environment Policy and Accountability Committee.
 - 28th March - Evidence gathering study starts.
 - 24th April 2022 – Evidence gathering study ends.
 - 24th April 2022 – 12 week consultation ends.
 - 25th May 2022 - Full Council meeting– Revised licensing policy approved.
53. Given that an evidence study for any new cumulative impact policy (CIP) areas has now been deferred to a later date, the intention is that any such study will be tailored so it informs our decision for the renewal of our Licensing Policy, as well as any future CIP areas.

Statement of Gambling Policy

54. The Gambling Act 2005 became effective in 2007 and Hammersmith & Fulham published its Statement of Gambling Policy (SGP) in January of that year. Section 349 of the Act 2005 requires all licensing authorities to prepare and publish an SGP that they propose to apply in exercising their functions under the Act during each three-year period to which the gambling policy applies.
55. Any SGP may last for a maximum of three years and can be reviewed and revised by the relevant authority at any time during that period. The Council's current SGP took effect in January 2019 and expires in January 2022.
56. The Licensing team started a public consultation on newly revised SGP as outlined below:
- 12 July 2021 – start of 10 week consultation.
 - 19 July 2021 - Community Safety and Environment Policy and Accountability Committee.
 - 19 September 2021 – end of 10 week consultation.
 - 19 January 2022 - Full Council meeting to approve revised SGP.

57. A number of minor amendments were suggested at the outset of the consultation and proposals were also made to remove our current no casino resolution. A further proposal was also made to try to limit the time during which adult gaming centres can open to 11pm (they can currently operate 24 hours). A proposal has recently been suggested to further reduce this time 10pm which is currently being investigated.
58. All of the consultees thought that the Council should retain its no casino resolution. There was also strong support for limiting the times during which AGCs could operate. The Police were also in support of a limitation of hours for AGC premises and had no concerns with the removal of the Council's no casino resolution.
59. However, during the consultation period a number of consultees raised concerns in relation to the proposal to limit the times during which AGCs could open. The Licensing team has since received legal advice on this point, and the other suggested changes, which confirms that these alterations are lawful. A link to the proposed changes to the current Policy can found below:

[Appendix 2 - Summary of changes made to the current 2019 Statement of Gambling Policy.pdf](#)

Cumulative Impact Assessments (CIAs) – Fulham and Shepherds Bush

60. The Council currently has two cumulative impact policies (CIPs) in Fulham and Shepherd's Bush. These policies were introduced in 2009 and 2011 respectively. The Policing and Crime Act 2018, which came into force on the 6 April 2018, outlined that any evidence for existing cumulative impact policies should be renewed no later than three years after the legislation was introduced i.e. by the 6 April 2021.
61. The Covid-19 pandemic has meant that evidence could not be collected as was planned in 2020. The delay in gathering evidence has meant that the supporting evidence for both CIPs expired on the 6 April 2021.
62. If any evidence was gathered during the pandemic it would almost certainly not have been a true indication of the way the day / night-time economy would operate in the future, and could have potentially provided misleading or inaccurate information.
63. The Licensing Authority has now carried out a public statutory consultation on the removal of the policies from our overall Statement of Licensing Policy (SLP). This consultation took place following the timetable below:
- 2 July 2021 – 8 week consultation starts.
 - 19 July 2021 – Consultation report presented to members of the Community Safety and the Environment Policy and Accountability Committee.

- 27 August 2021 – 8 week consultation ends.
 - 19 January 2022 - Full Council meeting to remove of CIPs from the Council's Statement of Licensing Policy and possibly introduce new CIP areas (depending on an evidence gathering study).
64. As part of the consultation process we asked consultees for their thoughts on the future of CIP areas in the borough, and how effective they felt the outgoing areas had been. We also asked if they thought we should delay any potential evidence gathering for new policies until 2022, when the hospitality sector has (hopefully) returned to some form of normality.
65. In summary, the majority of the responses were strongly in favour of the expired CIP areas and the restrictions they imposed on licensed premises. There was also support to go ahead with an evidence gathering study, delayed until 2022, to support new CIP areas.
66. All of the information from consultees will be incorporated into a report for Full Council in January 2022. If the recommendations in the report are approved the policies will be removed and new policies will be introduced, depending on the forthcoming evidence gathering study.

Enforcement Policy

67. 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

68. 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 Council's 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)

69. 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 being postponed. 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.

70. 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

71. 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.
72. Our enforcement policy contributes towards the corporate priorities of the Council and open and transparent decision making

Risk Management Implications

73. 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 - Details of the Licensing Sub Committees

Appendix 2 - Details of Appeals

Appendix 3 – Details of complex cases

