

Gravesham and Medway Shared Licensing Service Update

Overview of the shared service arrangement

The Shared Licensing Service sits within Gravesham Borough Council's Regulatory Services, within the Communities directorate.

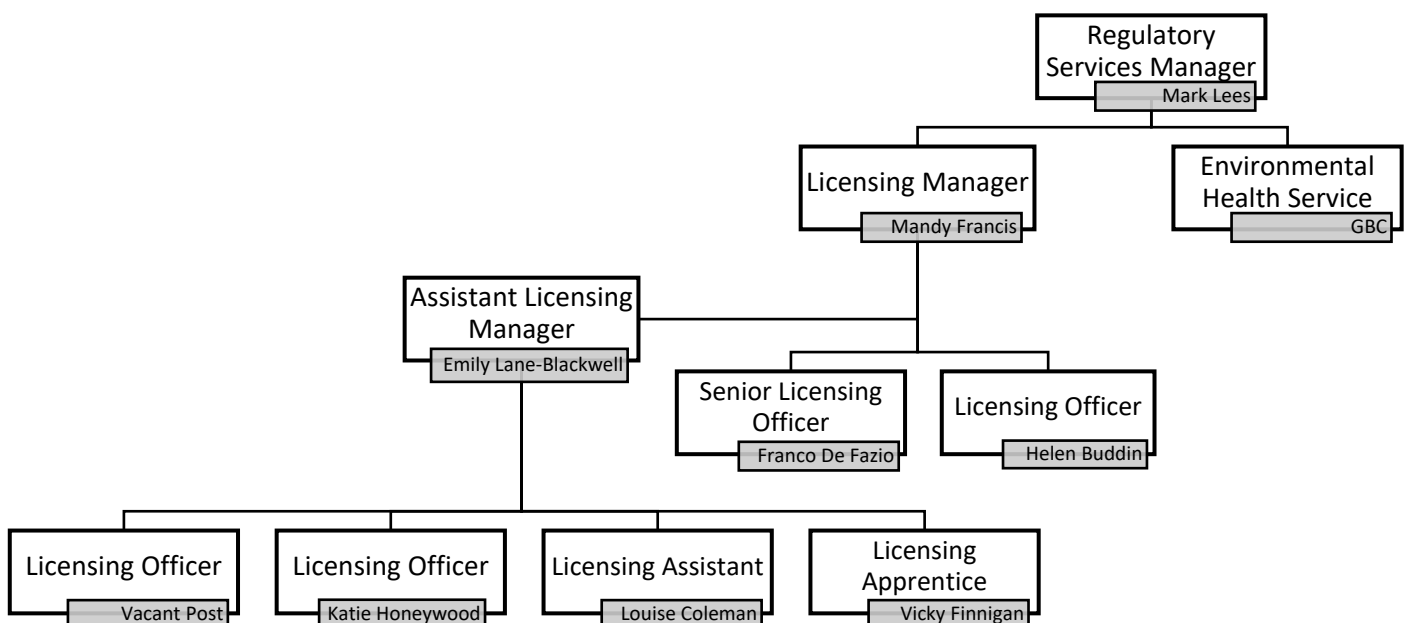
The team are responsible for discharging Gravesham Borough Council's and Medway Council's licensing functions in terms of administering and regulating the licensing regimes in respect of:

- Premises/clubs selling alcohol or providing regulated entertainment or late night refreshment
- Temporary Event Notices
- Personal alcohol licences
- Taxi and private hire drivers and vehicles, and private hire operators
- Gambling premises and activities
- Sex establishments
- Scrap metal
- Charitable collections
- Street Trading

During the last 12 months, the vacant Licensing Assistant and Licensing Apprentice posts have been successfully filled, providing the team with a full complement of staff for the first time since the commencement of the shared service. Since mid June, we have however, one Licensing Officer post currently vacant due to retirement and it is anticipated that this post will be filled in the not too distant future.

This has enabled progress to be made in carrying out compliance and enforcement activities including enhancing fee collection and associated interventions following non-payment.

The current structure is depicted below:



Progress:

Efficiency savings

During 2022/23, we continued to build on our already impressive digital offering which now includes the online street collection application form for Medway (as well as Gravesham) referred to in the last update, featuring automated internal consultation with Town Centre Management, responses, and logging functions.

In addition, we are currently working with colleagues in our IT and Digital Teams to create interactive online licensing registers to better meet customer expectations. Efficiencies are also being sought through the creation of multifaceted online forms to handle Designated Premises Supervisor variation, transfer of owner, Minor Variation and Full Variation of premises applications. Moving forwards, we still plan to provide a complete suite of online Licensing Act 2003 forms to preempt the eventual termination of the GOV.UK forms, and create additional auto-populating templates for premises licences, etc.

The ongoing financial savings arising from the comprehensive restructure which took effect from April 2019 following the TUPE transfer of all ex-Medway employees of the licensing team in January remain in place.

Added resilience across the two authorities

The aforementioned original restructure retained the same number of posts as previously existed across the two separate teams, resulting in a larger, single pool of officers to provide added resilience to cover the work of both Licensing Authorities.

This resilience has repeatedly proved essential to cope with the additional burdens arising from new and expanding/evolving licensing regimes, and in ensuring continuity of service during periods of staff sickness and vacant posts, as well as during the pandemic. A recent example has been the re-rating of business premises in respect of non-domestic rateable values, which statutory annual licence fees are based on. This has resulted in officers having to undertake an additional and very onerous task of individually checking the annual fees for all licenced premises across both authorities (c.1000) and updating the finance and back-office systems in each case to ensure correct invoicing and accurate maintenance of records.

More recently and following successful appointments to the vacant Licensing Assistant and Apprentice posts, the structure and work of both the team and individual officers were evaluated.

The outcome was the implementation of the temporary structure shown overleaf, which retains the same number of staff as in the established structure in order to ensure continued resilience, but with investment made in two members of staff to reflect additional duties being undertaken by them and associated changes to reporting lines made.

Recruitment to the vacant posts coupled with the revised structure has enabled the team to continue to provide the largely statutory, and increasingly demanding, desk-based functions, as well as resuming previously lacking compliance and enforcement activities which are essential for maximising income from licence fees and supporting the licensing objectives across all regimes to help our local economies thrive, maintain high standards in accordance with local policy, and ensure public safety.

The Teams' ability, through their hard work and dedication, to provide an excellent shared service demonstrates the intended benefits of, and continued need for, maintaining a large pool of officers in a suitably structured team for resilience.

Availability of specialist skills across both authorities leading to increased efficiency; potential for a reduced requirement for external support from contractors etc

Access to a wider pool of specialists across both council's, e.g., Public Health, IT, Digital, Environmental Health, Legal and Finance, continues to support diversification of the advice and guidance available to the Shared Licensing Service to inform decisions, facilitate change, function effectively, and expand knowledge.

Sharing of best practice in the delivery of the Licensing Service and expansion of knowledge base of individual officers

All six front-line members of the team under the current arrangement, i.e., all but the new Licensing Assistant and Apprentice, are highly trained, having achieved the Institute of Licensing accredited Professional Licensing Practitioner Qualification (PLPQ).

Where identified as beneficial, staff are also supported in undertaking additional training relevant to their roles and development, such as PACE and RIPA training to support the enhanced compliance and enforcement work, and regime-specific training courses in order to keep updated on legal, procedural, and best-practice developments.

Staff have continued to frequently liaise with one another, including during ongoing weekly Tuesday Team Meetings, and are now completely used to working in a hybrid manner, share information, collectively ascertain how to deal with more complex matters, or share/implement ideas for service improvements as part of cohesive and collaborative team working.

Their knowledge and continued approach towards embracing change, coupled with a high level of managerial, administrative, and technical support, has continued to prove invaluable in progressing the shared service to date.

This is being seen currently in the in-house training and development of our two new starters, who are progressing quickly.

Regular attendance at the Kent and Medway Regulatory Licensing Steering Group and IOL Regional Training Events, etc. also supports these objectives.

Delivering an enhanced digital service, making full use of available technology

We continue to be highly successful and innovative in this regard. Updates demonstrating our ongoing efforts in relation to this are provided in the Efficiency savings paragraph above.

Gravesham's digital services played a key role in enabling smooth continuity of service throughout the pandemic and continue to assist the team in being able to cope with ongoing changes to licensing regimes and additional burdens, e.g., pavement licensing, additional taxi and private hire DBS checks requirements, tax code checks, changing right to work check requirements, revised statutory guidance documents, re-rating of non-domestic rateable values, etc.

Officers are now set up as users for Medway employment check to create and process DBS applications online.

We are required to carry out checks on the NR3S register for every new or renewed hackney carriage and private hire driver. This is a National register that all authorities update and check with regard to revocation and refusals of licences.

Ensuring staff are adequately trained and supported

We have continued to support continuous professional and personal development through attendance of relevant (mostly virtual) training courses, coaching and mentoring, and experiential learning, etc. as referenced in the above paragraph 'Sharing of best practice in the delivery of the Licensing Service and expansion of knowledge base of individual officers'.

The Licensing Manager and Assistant Licensing Manager attended the 'By-stander' training arranged by Gravesham Borough Council. This will be disseminated to the rest of the team later in the year.

All officers are PACE trained with the exception of the Licensing Assistant and Licensing Apprentice.

All members of the team have been working through online accessibility training. This is to ensure that everything we place on our website, content and application forms, meets the accessibility requirements.

Management have continued to liaise with staff frequently and be available to them at all times with an open-door policy.

Realising procedural efficiencies to enable staff to recommence more field-based duties.

As had previously been anticipated, field-based duties have now resumed and continue to be progressed as a result of an appropriately resourced and structured team coupled with efficient procedural processes.

Compliance and enforcement

Visits are being undertaken to licensed premises, either by way of a spot check, responding to a complaint received from a member of the public or as part of a joint operation with other responsible authorities and/or organisations, looking at specific types of premises, e.g. with the immigration team and/or food safety team to take-aways and restaurants.

Officers inspect Medway licensed hackney carriage and private hire vehicles by visiting taxi ranks, schools and prime locations such as supermarkets and train stations. These visits are undertaken on ad-hoc days and times, including weekends and out of hours as and when appropriate. Recent inspections have identified only minor breaches such as not displaying door signs or failing to notify us of an accident. In May 2023, we participated in a multi-agency operation with the Police, DVSA and Medway Council's Environmental Enforcement team, stopping and checking vehicles. One taxi was in the vicinity at the time and was inspected by a Senior Licensing Officer and no defects or breach of licence conditions were found. A further operation is proposed in the future, subject to the availability of other agencies.

Audits of Gambling premises are ongoing to ensure the correct permits are in place for the types of machines they have.

Licensed Operator audits and a visit to the sexual entertainment venue are scheduled to take place.

Street Trading and Scrap Metal Licence compliance and enforcement is carried out by the Environmental Enforcement team on behalf of the Licensing Team. Between 2021 and 2023 they have successfully prosecuted 5 individuals for illegally trading a scrap metal dealers and have 3 pending. They have also investigated allegations of illegal street trading, giving advice when appropriate to ensure compliance and no prosecutions were necessary.

Debt collection

In addition to the increase in compliance and enforcement activities, and since the team was fully resourced in December 2022, targeted officer intervention and enforcement has resulted in approximately £52,000 of unpaid/overdue annual premises licence fees across both authorities being collected; the debt at the time totalled approximately £64,000.

Debt collection is now being undertaken monthly and visits are made to licensed premises to explain to the licence holder that if they fail to pay the annual fee their licence must be suspended until such time as the payment has been made. These visits usually result in the debt being cleared immediately.