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### Cabinet Member for Policing and Equalities

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**Time and Date**

9.00 am on Monday, 28th July, 2025

**Place**

Committee Room 3 - Council House

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**Public Business**

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 8)
  - (a) To agree the minutes of the Cabinet Member (Policing and Equalities) meeting held on the 10<sup>th</sup> April 2025
  - (b) Matters arising
4. **Licensing Act 2003 - Review of Statement of Licensing Policy 2026 - 2031** (Pages 9 - 42)

Report of the Director of Law and Governance.
5. **Annual Compliance Report 2024 - Regulatory & Investigatory Powers Act 2000 (RIPA)** (Pages 43 - 50)

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

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

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

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

Friday, 18 July, 2025

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

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

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**Lara Knight**

**Email:Lara.knight@coventry.gov.uk**

**Coventry City Council**  
**Minutes of the Meeting of Cabinet Member for Policing and Equalities held at**  
**9.00 am on Thursday, 10 April 2025**

Present:

Members: Councillor AS Khan (Cabinet Member)  
Councillor P Akhtar (Deputy Cabinet Member)  
Councillor J Lepoidevin (Shadow Cabinet Member)

Other Members (By Invitation): Councillor N Akhtar  
Councillor S Jobbar

Employees (by Directorate):

Law and Governance J Adams, F Cartwright, L Knight, L Nagle

## **Public Business**

### **29. Declarations of Interest**

There were no disclosable pecuniary interests.

### **30. Minutes**

The minutes of the meeting held on 27<sup>th</sup> February 2025 were agreed and signed as a true record.

### **31. Renewal of a Public Spaces Protection Order for St Michaels and Surrounding Area**

The Cabinet Member for Policing and Equalities considered a report of the Director of Law and Governance, which sought approval to renew the Public Spaces Protection Order for St Michael's and surrounding areas.

In 2019 a Public Spaces Protection Order (PSPO) was created for St Michael's Ward and the surrounding areas. The Order was granted following public consultation that was overwhelmingly in favour of the Order being granted. The matter was discussed by the Scrutiny Co-ordination Committee at its meeting on 11<sup>th</sup> June 2019. The Order was subsequently renewed in 2022.

The original reason for the Order being sought was in response to the serious instances of public place violence witnessed in the city and criminal exploitation of young people. Tackling public place and serious youth violence remained a key priority for the Council and partners and it was felt that this Order plays an important part in trying to address this and make people feel safer in their communities.

Significant resources had been allocated to address matters, both regionally and locally. Whilst there appeared to be a reduction in visible "postcode gangs", it was believed that many young people were still vulnerable to criminal exploitation,

particularly around the drugs trade and, rather than be in street gangs, they were more likely to be involved in Organised Crime Groups. These groups often used violent methods to protect the areas they operate in and to deter others.

In recent times, an increase in violent incidents had been seen in the areas the Order is applicable to. Whilst it was acknowledged that a PSPO would not tackle these issues on its own, it was a tool for Police Officers to use. PSPOs were useful in that they could be used proactively for situations where officers have a concern that matters might get out of hand, people can be directed to disperse from an area rather than having to wait for an actual criminal offence to occur, which would involve additional resources and public expenditure.

Details of crime statistics for St Michael's Ward were appended to the report submitted, although it was noted that all potential criminal acts addressed or deterred by the use of the Order would not occur solely in St Michael's Ward as gangs also carried out criminal acts elsewhere in the city and outside of the city boundaries.

The Order is an "informed order", meaning that someone would be informed that there is an order in place and that their behaviour was unacceptable. Should they accept an officer's instruction and disperse, there would be no further action taken. Should they refuse to disperse and leave the area, that would be a breach of the Order. Police colleagues now record their use of PSOP's and their interactions with the public on body worn cameras and, as such, if people have a complaint regarding the use of the powers, this could be assessed.

The Cabinet Member noted that there is currently an IT issue that means current information regarding the usage of the Order is unavailable. It was reported at the meeting that work is ongoing to establish a recording mechanism to fully understand where there has been a compliance at first request therefore making it unnecessary to issue a Notice under the provisions of the Order.

The Cabinet Member noted impact statements from West Midlands Police, the Business Improvement District, Staff from the Parks and Streetscene within the Council, and the Police and Crime Commissioner, which were also appended to the report. In addition, the Cabinet Member also considered oral representations at the meeting from Chief Inspector Hamir Godhanian and several members of the public, who highlighted the antisocial behaviour and criminal activities which impact their lives.

**RESOLVED that, the Cabinet Member for Policing and Equalities:**

- 1. Note the impact statements and crime statistics from key agencies attached to the report and their rationale for extending the existing Order.**
- 2. Approve that the Order be extended for a period of three years from the date the current Order is due to expire.**
- 3. Request that all partners continue with their current actions, patrol plans and monitor the surrounding areas for any potential displacement of the issue.**

32. **Response to Petitions to Tackle Crime and Anti-Social Behaviour within Hillfields**

The Cabinet Member for Policing and Equalities considered a report of the Director of Law and Governance, which responded to petitions seeking to tackle crime and anti-social behaviour (ASB) in Hillfields.

Officers had reviewed the action taken by the City Council and the Police to address the issues raised by the petitioners. Over the past 4 years a number of initiatives had been run using a partnership approach to tackle issues of crime and ASB in Hillfields. Most recently Citizen and Coventry City Council partnered to improve outcomes and the physical environment for residents in the St. Michael's ward, with a specific focus on the Hillfields area.

Taking a partnership approach with the local Police team, social landlords and other agencies worked together to address a number of issues. This included work to reduce the risk of sexual exploitation for women and a coordinated and sustained disruption approach to known criminal offenders within the area. The partners shared local intelligence and utilised tools such as Community Protection Notices, Public Space Protection Orders (PSPOs) and Stop and Search to reduce ASB activity.

It was noted that redeployable cameras have been installed in fly-tipping hotspots, including Hillfields. These cameras have helped reduce fly-tipping by capturing evidence for legal action. While their main purpose is to monitor fly-tipping, they also record other crimes. Residents are encouraged to report crime issues to 101 or 999 in emergencies.

There are scheduled programs for street cleansing, with Hillfields receiving more frequent cleaning than other areas of the city. There is also a contracted weed removal service scheduled twice a year.

The Council acknowledged that public space drinking impacts safety perceptions but it cannot prohibit street alcohol consumption or fine individuals for it. Excessive alcohol consumption leads to crime and ASB. To tackle this, the Council has introduced PSPOs. The City-Wide PSPO empowers Police to confiscate alcohol from street drinkers in certain circumstances, allowing early intervention to prevent intoxication-related ASB. Additionally, specific powers enable Police action against groups involved in crime and ASB in Hillfields. To determine the effectiveness in Hillfields, the use of these powers is currently being monitored by the City Tasking Group on behalf of the Coventry Community Safety Partnership.

The Council recognised the importance of providing comprehensive activities for children during school holidays. In Coventry, the Council offers the Coventry Holiday Activities and Food (HAF) Programme, a national initiative by the Department for Education. This programme allows eligible children and young people to participate in free activities and experiences, with complimentary meals included. The scheme operates in the Hillfields area and is promoted to children and parents through communications with local schools.

In addition, the Coventry Community Safety Partnership supports the delivery of the Steps Together Programme in Hillfields, an after-school chaperone programme, to ensure children have a safe route home from secondary school. Within Hillfields, a regular programme of activities is also provided by the Positive Youth Foundation through the Hillfields Young Peoples Centre. These services target older children and aim not only to divert them from crime and exploitation but also to help develop positive opportunities for their future.

The Positive Parenting team deliver a parenting support programme, which offers a range of parenting support for all families, covering courses from antenatal programmes to early years and teenagers.

The St Michaels Policing Team covers the Hillfields area. There are a number of police officers and PSPOs assigned to this area, addressing various crimes and incidents of ASB. Rebuilding community policing is a primary objective of the West Midlands Police Crime Commissioner, aiming to increase the visibility of officers within communities. Although new plans will be published in April 2025, initiatives are already in progress. These are being implemented through Operation Advance, an intelligence-led operation that allocates significant police resources to the area.

Councillor N Akhtar and the Petition Organiser spoke in support of the first petition, highlighting the following points:

- Fly-tipping and street drinking, particularly around the Harnall Lane East area.
- People bringing alcohol into the area and drinking outside all night.
- Litter being left by those drinking, including cans, bottles and food waste if they eat.
- Children of school age out in the street during the day while they should be at school, causing health and safety concerns with road traffic and a nuisance to residents by knocking doors and running away and kicking footballs against walls and doors. This is a particular concern around the Craner Road area.
- Risks of child exploitation, particularly when there are 10 year old girls on the streets.
- Drug dealing in the local area, causing a nuisance; being abusive and swearing at local residents, with little police support when reported.
- Weed plantations within the neighbourhood.
- Many properties in the area don't have front gardens, resulting in these incidents happening very close to homes.

Councillor S Jobbar spoke in support of the second petition, highlighting the following points:

- An increase in the number of ASB incidents.
- The impact on resident's safety and wellbeing.
- Drug taking in the area has been dramatic.
- Criminal gangs using larger alleyways for their criminal activities.
- Requirement for an action plan with housing providers to tackle the issues.

In response, the Cabinet Member was advised by officers that the work undertaken in the area was continuing and petitioners were reminded of the importance of reporting incidents of ASB, in order to ensure that there is a full picture of activity which can inform future resources.

**RESOLVED that, the Cabinet Member for Policing and Equalities:**

- 1. Requests that West Midlands Police and Council officers continue their monitoring of the area and respond accordingly to residents requiring assistance.**
- 2. Encourages residents to report crime, ASB and environmental issues to the Police and Council.**
- 3. Requests that the Coventry Community Safety partnership identify key initiatives for reducing crime and ASB in Hillfields.**
- 4. Requests that the City Tasking sub-group of the Coventry Community Safety Partnership continue to monitor the use of a Public Space Protection Order (PSPO) in Hillfields and monitor the progress of the key initiatives to reduce crime and ASB in Hillfields.**
- 5. Requests that information be passed to the Attendance Team to investigate non attendance at school of children in the Craner Road area.**

**33. Outstanding Issues**

There were no outstanding issues.

**34. Any Other Business**

There were no other items of business.

(Meeting closed at 10.22 am)

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## **Public report** Cabinet Member Report

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Cabinet Member for Policing & Equalities  
Licensing & Regulatory Committee

28 July 2025  
5 August 2025

**Name of Cabinet Member:**

Cabinet Member for Policing and Equalities - Councillor AS Khan

**Director Approving Submission of the report:**

Director of Law and Governance

**Ward(s) affected:**

All

**Title:**

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

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**Is this a key decision?**

No

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

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**Executive Summary:**

The purpose of this report is to seek Members' views and approval to consult on the draft revised Statement of Licensing Policy 2026 – 2031 under the Licensing Act 2003.

**Recommendations:**

The Cabinet Member for Policing and Equalities is recommended to:

1. Consider the draft revised Statement of Licensing Policy and authorise the Director of Law & Governance to carry out the consultation as detailed in the report.

The Licensing & Regulatory Committee is recommended to:

1. Consider the draft Statement of Licensing Policy and forward any comments it wishes to make as part of the consultation process.

**List of Appendices included:**

Appendix 1 - Revised Statement of Licensing Policy (shaded paragraphs illustrate the amendments to the document)

**Other useful background papers:**

Licensing Act 2003

Section 182 Guidance to Licensing Authorities

**Has it been or will it be considered by Scrutiny?**

No

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

Yes - Licensing & Regulatory Committee – 5 August 2025

**Will this report go to Council?**

No – The revised Review of Statement of Licensing Policy 2026 – 2031 will be submitted to Council following the consultation process.

## **Report title: Licensing Act 2003 – Review of Statement of Licensing Policy**

### **1. Context (or background)**

- 1.1 Under the terms of the Licensing Act 2003 the Council's Statement of Licensing Policy has to be renewed every five years. The current Statement of Licensing Policy came into effect on 16<sup>th</sup> March 2021 and a review must therefore be completed. There is a requirement in the Act for the Council to publish and advertise the revised Statement of Licensing Policy at least 4 weeks before, by 16<sup>th</sup> February 2026.
- 1.2 The Statement of Licensing Policy produced by the Licensing Authority under the Licensing Act 2003 will be relevant for all licensing decisions taken by the Council as the Licensing Authority over five years commencing on 16<sup>th</sup> March 2026.
- 1.3 The general principles of the Statement of Licensing Policy remain the same and the document is still centred around the Licensing Act's four licensing objectives, namely:
  - Preventing of Crime & Disorder
  - Promotion of Public Safety
  - Prevention of Public Nuisance
  - Protection of Children from Harm
- 1.4 Before amending the Policy for a further five-year period, licensing authorities are required to carry out a wide consultation process. In addition to those it must consult by law, the Council has authority to include in the process any individuals or organisations it deems appropriate.
- 1.5 The Responsible Authorities (statutory consultees – West Midlands Police, West Midlands Fire and Rescue Service, Planning, Environmental Health Safeguarding Children Board, HM Revenue & Customs, Community Safety and Public Health will be consulted on the draft revised Policy.
- 1.6 The public consultation exercise will begin on the 12 August 2025, for an 8-week period and will finish on the 7 October 2025 and will include the following elements:
  - Mail shots to representatives of the licensed trade, clubs and key partners;
  - Formally writing to the Chief Officers of the responsible authorities;
  - Mail shots to businesses and organisations; and
  - Wider public consultation through the City Council Website.
- 1.7 The revised Policy complies with updated guidance and regulations. It has been developed with all 6 Warwickshire Licensing Authorities (Warwickshire County Council, North Warwickshire Borough Council, Nuneaton & Bedworth Borough Council, Rugby Borough Council, Stratford on Avon District Council and Warwick District Council), although each authority has adapted the Policy to suit the needs of their area and profile.

A copy of the draft revised Policy is attached as an Appendix to the report.

## **Key Changes to the Revised Licensing Policy**

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

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

## **2. Options considered and recommended proposal.**

2.1 The Cabinet Member for Policing and Equalities is requested to consider the draft-revised Statement of Licensing Policy and authorise the Director of Law & Governance to carry out the consultation as detailed in the report.

2.2 The Licensing and Regulatory Committee is requested to consider the draft revised Statement of Licensing Policy and forward any comments as part of the consultation process.

## **3. Results of consultation undertaken**

3.1 The results of the consultation process will be submitted for consideration to Cabinet Member for Policing and Equalities before a finalised Policy document is presented to Full Council for approval.

## **4. Timetable for implementing this decision.**

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

## **5. Comments from Director of Finance & Resources (Section 151 Officer) and Director of Law & Governance.**

### **5.1 Financial implications**

The financial implications associated with the recommendation are budgeted for and are limited to the employee costs associated with undertaking the consultation exercise and any costs involved in publishing the Statement of Licensing Policy.

### **5.2 Legal implications**

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

The licensing function is carried out by the Council's Licensing and Regulatory Committee and officers exercising delegated powers. The one exception is the

approval of the Policy, which must be approved by Full Council.

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

## **6. Other implications**

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

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

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

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

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

### **6.2 How is risk being managed?**

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

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

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

### **6.3 What is the impact on the organisation?**

The adoption of the Policy should have no impact on the organisation. There is no human resource, financial or ICT implications.

### **6.4 Equalities / EIA**

The Statement of Licensing Policy makes links to the Council's Equality and Diversity Policies and an Equalities Assessment exists for licensing activities. This will be reviewed and updated as part of the consultation process.

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

None

## 7. Implications for partner organisations?

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

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

## 7.1 Human Rights Act Implications

None

### Report author(s):

#### Name and job title:

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Enquiries should be directed to the above person.

Contributor/approver name	Title	Service	Date doc sent out	Date response received or approved
<b>Contributors:</b>				
Tom Robinson	Governance Services Officer	Law and Governance	26/06/2025	26/06/2025
Debbie Cahalin-Heath	Strategic Manager of Regulation	Regulatory Services	09/06/2025	12/06/2025

Davina Blackburn	Strategic Lead of Regulation & Communities	Regulatory Services	12/06/2025	23/06/2025
<b>Names of approvers for submission: (officers and members)</b>				
Amy Wright	Regulatory Lawyer	Law and Governance	26/06/2025	01/07/2025
Richard Shirley	Lead Accountant	Finance	26/06/2025	26/06/2025
Julie Newman	Director of Law & Governance	Legal & Governance Services	04/07/2025	07/07/2025

Cllr AS Khan	Cabinet Member for Policing & Equalities		04/07/2025	07/07/20 25
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## **Licensing Act 2003**

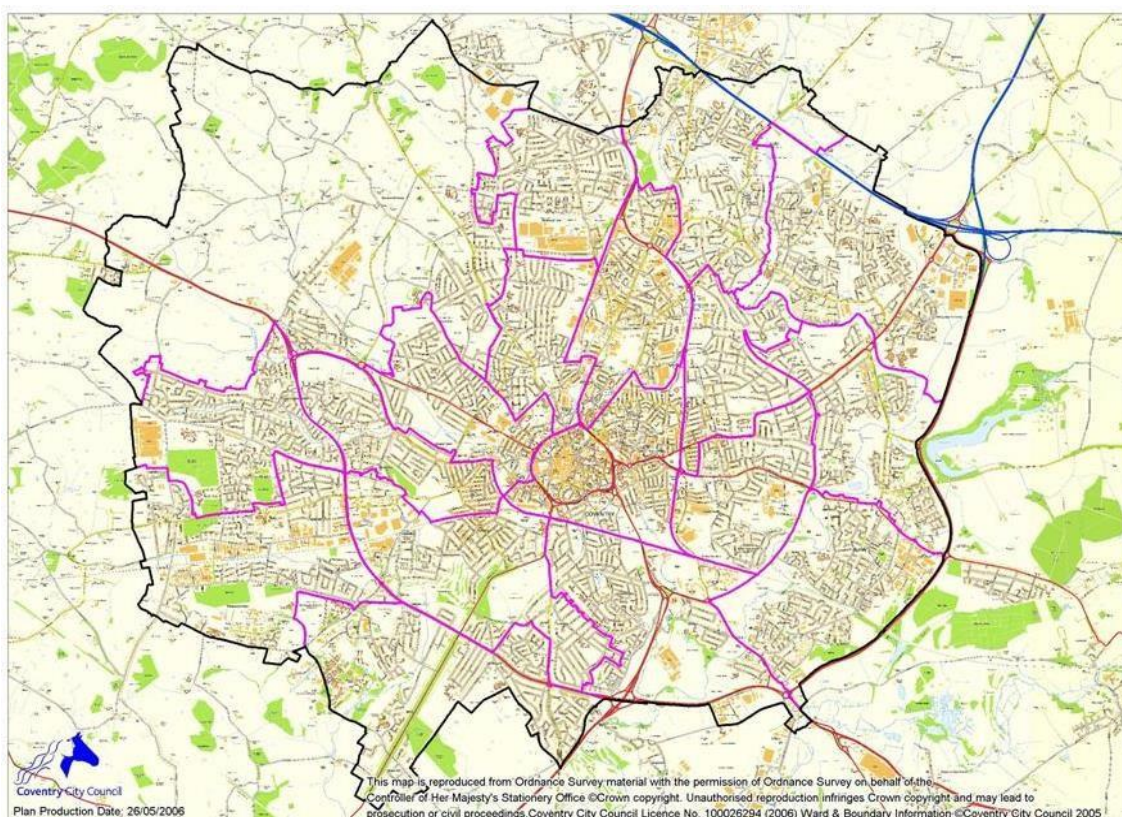
# **Statement of Licensing Policy 2026 - 2031**



## Important Note

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

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



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### **Supporting documentation**

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

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

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

## STATEMENT OF LICENSING POLICY

### 1 INTRODUCTION

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

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

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

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

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

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

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

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

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

#### **Responsible Authorities**

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

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

### **The Licensing Authority as a Responsible Authority**

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

### **Public Health as a Responsible Authority**

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

## **2 CONSULTATION**

- 2.1 Before publishing this policy statement, the Council has consulted with and considered the views of the following in line with the statutory guidance:
- Chief Constable of West Midlands Police.

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

2.2 Further details on the consultation and political approval process undertaken prior to publishing this document are available via [www.coventry.gov.uk/councillmeetings](http://www.coventry.gov.uk/councillmeetings).

### **3 FUNDAMENTAL RIGHTS**

- 3.1 Under the terms of the Act any person may apply for a variety of authorisations and have each application considered on its individual merits. Equally, any person has a right to make relevant representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the Act.
- 3.2 Applicants and those making relevant representations in respect of applications to the Council have a right of appeal to Coventry Magistrates' Court against the decisions of the Council.

### **4 LICENSING CONDITIONS**

- 4.1 Licensing is about regulating the carrying on of licensable activities on licensed premises, by qualifying clubs and at temporary events within the terms of the Act. Premises include open spaces. Conditions attached to various authorisations will be focused on matters, which are within the control of individual licensees and others in possession of relevant authorisations. Accordingly, these matters will centre on the premises being used for licensable activities and the vicinity of those premises. If there is an incident or other dispute, the Council will primarily focus on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activities in the area concerned.
- 4.2 The Council cannot impose conditions unless it has received a relevant representation.
- 4.3 When considering any conditions, the Council acknowledges that licensing law should not be seen as the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and therefore beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned. Nonetheless, it is a key aspect of general control and licensing law will always be part of a holistic approach to the management of the evening and night- time economy of the city. For example, applicants should note that stricter conditions to control noise are likely to be imposed in the case of premises situated in largely residential areas.
- 4.4 The Council does not propose implementing standard licensing conditions on licences or other relevant types of authorisation across the board. Therefore, the Council will attach conditions to relevant authorisations which are tailored to the individual style and characteristics of the premises and events concerned and that are appropriate to promote the licensing objectives in the light of the representations received.

### **5 OPERATING HOURS**



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

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

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

## **7 CUMULATIVE IMPACT**

- 7.1 For the purposes of this document 'cumulative impact' means the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area. Cumulative impact is a proper matter for the Council to consider in developing its licensing policy. This should not be confused with 'need', which concerns the commercial demand for another particular type of premises. Government Guidance states that "need" is not a matter for the Licensing Authority but is a matter for the planning authority and the free market.
- 7.2 The Licensing Authority, having not been presented with sufficient evidence to the contrary, does not consider any area within the city to currently have a particular concentration of licensed premises causing a cumulative impact on one or more of the licensing objectives. The Licensing Authority will keep this matter under review and accordingly reserves the right, should the need arise, to introduce a special policy concerning cumulative impact during the life of this statement of licensing policy.
- 7.3 The absence of a special policy does not prevent any Responsible Authority or any other party from making representations on a new application for the grant of an authorisation on

the grounds that the premises will give rise to a negative cumulative impact on one or more of the licensing objectives. The Act allows for such consideration, but the individual merits of each application must always be considered.

## **8 PROMOTION OF THE LICENSING OBJECTIVES**

### **Prevention of Crime and Disorder**

- 8.1 Licensed premises, especially those offering late night/early morning entertainment or alcohol and refreshment for large numbers of people, can sometimes be associated with elevated levels of crime and disorder.
- 8.2 The Licensing Authority expects existing authorisation holders and new applicants to regularly review their arrangements in addressing crime and disorder issues pertinent to their particular licensable activities, location and/or premises. Information and advice can be obtained from the Police, business network groups and other sources. The Licensing Authority also encourages local residents and other businesses to discuss issues of concern directly with individual businesses, or, to contact the Police Licensing Officer if they believe that particular licensed premises are failing to promote this objective.
- 8.3 The City Council as a statutory member of the Local Community Safety Partnership will develop and deliver against multi-agency strategies and action plans to tackle the misuse of alcohol, which has also been identified in the Cabinet Office's Alcohol Harm Reduction Strategy as being a precursor to crime and anti-social behaviour. The Licensing Authority expects existing authorisation holders and new applicants to be able to demonstrate the measures they use, or propose to adopt, to prevent and actively discourage the sale/supply of alcohol to children and the sale/supply of alcohol to individuals who are already intoxicated and thus potentially vulnerable themselves or pose a risk to others. In general, conditions will reflect local crime issues and subsequent prevention strategies.
- 8.4 The risk assessment approach remains fundamental in the operation and good practice of all licensed premises. Authorisation holders and applicants are strongly recommended to work closely with the Local Policing Unit Partnerships Team in particular, in bringing into effect appropriate control measures to either overcome established or prevent potential problems. A combination of short and longer-term strategies may need to be deployed by authorisation holders to sustain and promote the prevention of crime and disorder. The Police have a list of recommended SIA registered Operators and we would advise that this list be used when considering the employment of SIA registered door staff.
- 8.5 During unprecedented times, such as a pandemic, authorisation holders will also have to work closely with other agencies, such as Environmental Health Officers in order to produce appropriate and adequate risk assessments to demonstrate compliance with relevant government guidance.
- 8.6 Queues at late night take-aways can be a source of disorder and applicants for Premises licences for this type of premises are expected to address this in their Operating Schedule.
- 8.7 The City Council has specific duties under Section 17 of the Crime and Disorder Act 1998 that underpins any control strategy that is employed. The Council will continue to work in partnership with the Police in addressing crime and disorder issues.



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

#### **Promotion of Public Safety**

- 8.14 Public safety is not defined within the Act, but the Government Guidance advises that it is concerned with the physical safety of people using the premises and not with public

health. To ensure the safety of customers, applicants should be prepared to demonstrate, where necessary, that the premises comply with all health and safety regulations and that risk assessments, where needed are current, and in line with relevant government guidance.

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

### **Prevention of Public Nuisance**

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

- 8.22 Licence holders already in receipt of complaints should seek an early remedy to any confirmed problem. The organisers of temporary events should pre-empt potential

nuisance, especially when complaints have previously arisen at the same venue.

- 8.23 The Licensing Authority expects authorisation holders to use their risk assessments and operating schedules to review and, if need be, to make necessary improvements to the premises, or to operational practices, in order to prevent public or statutory nuisance.
- 8.24 Where the provisions of existing legislation prove inadequate or inappropriate for control purposes, the Licensing Authority will consider imposing licence conditions. Any condition deemed appropriate and imposed by the Licensing Authority to promote the prevention of public nuisance will focus on measures within the direct control of the licence holder or designated premises supervisor.
- 8.25 Coventry's Director of Public Health will provide evidence on the impact of the health and wellbeing of vulnerable groups such as street drinkers, and the effect this has on anti-social behaviour.

#### **Protection of Children from Harm**

- 8.26 The Act details a number of legal requirements designed to protect children in licensed premises. The Licensing Authority is duty bound to ensure that authorisation holders including organisers of temporary events, create safe environments (in terms of physical, moral and psychological welfare) for children who may be on the premises. Children should be unable to access alcohol or drugs and be subject to an appropriate level of care and supervision at all times.
- 8.27 The Act prohibits children aged under 16 years old and unaccompanied by an adult, from being present in licensed premises (including premises operating under a TEN) that are being used primarily or exclusively for consumption of alcohol
- 8.28 In premises where alcohol is sold or supplied it is a mandatory condition that premises licence holders will operate a recognised "Proof of Age" scheme. The City Council supports the Challenge 25 scheme and where this is not proposed within the operating schedule, alternative and similarly rigorous controls should be detailed. The City Council recommends that the premise licence holder operates a method for recording when a sale is refused as part of any age challenge scheme (also known as a refusals book).
- 8.29 The Licensing Authority expects that customers should be confronted by clear and visible signs on the premises that underage drinking constitutes an offence in law and that they may well be required to produce proof of their age to a member of staff. Organisers of temporary events should apply similar safeguards in their undertakings. By ensuring licensed premises refuse sales of alcohol to children, or those attempting to purchase it on behalf of children, this will impact positively on a reduction in child alcohol-related health problems.
- 8.30 Venue operators seeking premises licences and club premises certificates can volunteer prohibitions and restrictions in their operating schedules because their own risk assessments have determined that the presence of children is undesirable or inappropriate. These will become conditions attached to the licence or certificate where no relevant representations are received by the Licensing Authority.
- 8.31 The Licensing Authority regards the Coventry Safeguarding Children Board as being the primary source of advice and information on children's welfare and would normally expect any advice/recommendations from the Board to be followed unless there are good reasons for not doing so. The Licensing Authority will attach appropriate conditions where

these appear appropriate to protect children from moral, psychological or physical harm. It is also reasonable for the Licensing Authority to expect the Responsible Authorities to intervene where the basis for the intervention falls within the remit of that other authority. For example, the police should take appropriate steps where the basis for the review is concern about crime and disorder or the sexual exploitation of children.

- 8.32 The Licensing Authority will consider the need to protect children from sexual exploitation when undertaking licensing functions.
- 8.33 Coventry's Director of Public Health will engage with Coventry Safeguarding Children Board to share relevant information such as data on young people accessing substance misuse services. They will also consider the proximity of licensed premises to schools, youth centres, play groups and family centres and share anonymised A&E data with other responsible authorities relating to young people and alcohol related incidents
- 8.34 In order to prevent children from seeing films incompatible with their age, authorisation holders who exhibit films will be expected to impose and enforce viewing restrictions in accordance with the recommendations of the British Board of Film Classification. In exceptional cases e.g. where the BBFC has not classified a film then the Council may specify viewing restrictions which an authorisation holder will be expected to comply with.
- 8.35 It is expected that authorisation holders will ensure that, whenever children are in the vicinity of a film or exhibition that is being shown/staged in a multi-purpose premises, sufficient ushers/stewards (minimum 18 years old) will be in attendance at the entrance to the viewing rooms at all times to ensure children cannot enter or view the film or exhibition.
- 8.36 Children have access to a range of regulated public entertainment venues and may be present as members of a viewing audience or as performers in their own right. The Licensing Authority expects authorisation holders including those organising temporary public events, to make proper provision for child safety and welfare during such events. Notwithstanding public safety issues, supervisory arrangements must be reflected within operating schedules. Suitable monitoring strategies should also be in place to ensure that supervisory levels are appropriate.
- 8.37 Where a large number of children are likely to be present on any licensed premises, for example, a children's show or pantomime, the Council may require that there is an adequate number of adult staff at places of entertainment to control access and egress of children and to protect them from harm. Children present at events as entertainers will be expected to have a nominated adult responsible for each child performer.

8.38 Child Exploitation - the exploitation of children can take a number of different forms and perpetrators may subject children and young people to multiple forms of abuse at the same time, such as criminal exploitation (including county lines) and sexual exploitation.

8.39 Through partnership working with the Police, Child Protection and other agencies the Licensing Authority will work towards raising awareness of the signs of child exploitation in licensed premises.

## **9 MANDATORY LICENSING CONDITIONS**

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

## **10 OTHER CONSIDERATIONS**

### **Relationship with Planning**

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

### **Applications**

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

authorisation concerned.

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

### **Deregulated Public Entertainment**

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

### **Large Scale Events and Safety Advisory Groups**

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

and other statutory bodies in supporting event organisers in operating safe and well managed events. SAGs or multi-agency meetings are one way of promoting such partnership working.

## **11 Best Practice Schemes**

### **Safe & Secure Licensed Venues**

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

## **12 GUIDANCE FOR ON AND OFF LICENSED PREMISES**

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

## **13 INTEGRATING STRATEGIES AND THE AVOIDANCE OF DUPLICATION**

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

### **Crime, Nuisance and Harm Prevention strategies**

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

### **Health and Wellbeing Strategy**

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

### **Cultural strategies**

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

### **Coventry a Marmot City**

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

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

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

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



[intelligence summary: Alcohol consumption and harm among under 18 year olds](#)).

## **Transport**

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

## **Duplication**

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

## **Promotion of Equality**

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

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

## **14 ENFORCEMENT**

- 14.1 The Licensing Authority has an established working relationship with the Police and other enforcing authorities on enforcement issues. This will provide a more efficient deployment of resources targeting high risk premises and activities.
- 14.2 This enforcement regime in relation to licensing follows the Government's Regulators' Code in that it follows the basic principles of Openness, Helpfulness, Proportionality and Consistency. This is clarified by the operation of a ladder of intervention for Licensed Premises. This ladder of intervention is contained at Appendix 1. [Link to enforcement policy.](#)
- 14.3 Licensed premises are visited by the Responsible Authorities and the Licensing Authority to carry out targeted inspections to check that the premises licence/certificate is being complied with, to check compliance with other legislation and/or to deal with a complaint that has been received.
- 14.4 On some occasions a multi-agency group (representing a number of Responsible Authorities) known as the Licensing Taskforce, will visit the premises. The Taskforce officers inspect the areas of the premises relevant to their role. Again, any action taken

will be in line with the ladder of intervention.

14.5 There are several enforcement options available depending on the outcome of the inspection or complaint which includes:

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

## **15 ADMINISTRATION, EXERCISE AND DELEGATION OF FUNCTIONS**

### **Licensing and Regulatory Committee**

- 15.1 The powers of the Council under the Act may be carried out by the Licensing and Regulatory Committee, by a Sub-Committee or, instead, by one or more Council officers acting under delegated authority.
- 15.2 It is considered that many of the decisions and functions will be purely administrative in nature. In the interests of speed, efficiency and cost effectiveness the Council has delegated these functions to Sub-Committees, or in appropriate cases, to officers supporting the licensing function.
- 15.3 Where under the provisions of the Act there are no relevant representations on an application these matters will be dealt with by officers. Should there be relevant representations then an oral hearing will usually take place before a licensing sub-committee except where all parties agree to proceed in writing. A licence/certificate review will normally take place before

a licensing sub-committee. The following table sets out the delegation of functions:

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

### Application forms and process

- 15.4 The application form will be in the prescribed format. The operating schedule will form part of the completed application form for a premises licence and a club premises certificate. The form will need to contain information that describes the style of the venue, the licensable activities to be provided, the operational procedures, hours, nature of the location, needs of the local community, etc. Most importantly, the applicant will have to detail the steps that will be taken to promote the licensing objectives. Applicants should carry out a risk assessment before they apply for a licence.
- 15.5 Applicants are encouraged to fully consult the police and other statutory services well in advance of carrying out their risk assessments and submitting their applications. Application forms and guidance leaflets will be available from the Licensing Team and our website, including contact names for each of the responsible authorities that will be receiving applications. Most applications will require additional documentation and a fee to be included with the form. Incomplete

applications will not be considered and will be returned to the applicant.

15.6 Where national guidance permits, online applications will be accepted providing the necessary documentary attachments are uploaded into the application and the appropriate fee paid. Coventry is currently using the Electronic Licence Management System (GOV.UK) which is supported by the Department of Business Innovation and Skills.

15.7 Applicants are encouraged to make themselves aware of any relevant planning and transportation policies, tourism and cultural strategies and local crime, alcohol, drug and disorder strategies in order to take these into account, where appropriate, when formulating their operating schedule. Guidance notes containing contact and website information about these policies will be available from the Licensing Team, Regulatory Services. Contact details are below.

## **16 Environmental Best Practice in Licensed Premises**

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

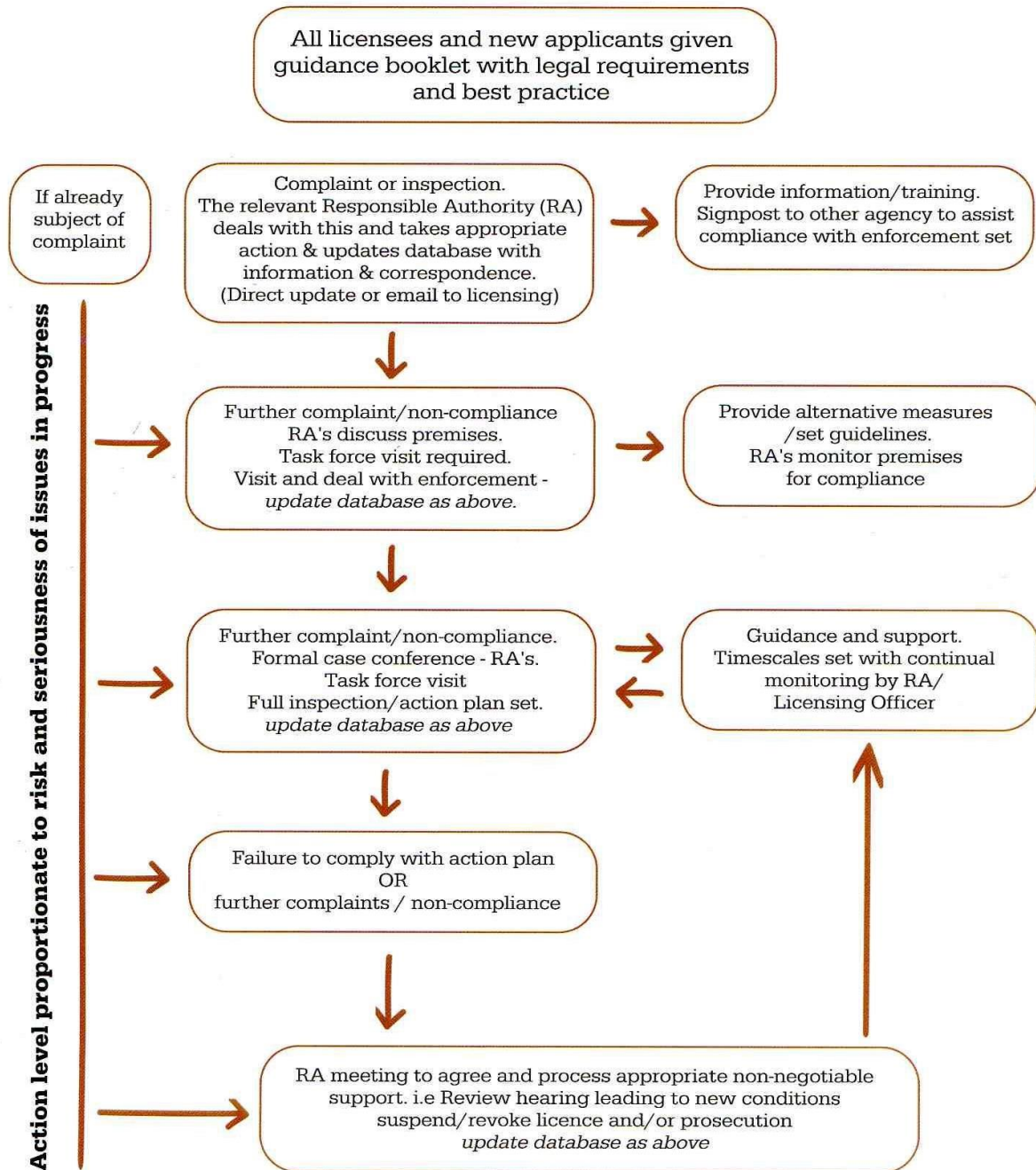
## **17 Comments on this Policy**

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

Regulatory Services  
PO Box 7097  
Coventry  
CV6 9SL  
Telephone Number: 024 7697 5496  
E-mail: [licensing@coventry.gov.uk](mailto:licensing@coventry.gov.uk)  
Website [www.coventry.gov.uk](http://www.coventry.gov.uk)

## APPENDIX 1

### Ladder of intervention - approach to enforcement issues



## APPENDIX 2

### Licensing Act 2003 – Responsible Authority Contacts

**Licensing Authority:**

Coventry City Council  
Licensing Team,  
PO Box 7097  
Coventry  
CV6 9SL  
Telephone: 024 7697 5496  
[licensing@coventry.gov.uk](mailto:licensing@coventry.gov.uk)

**Contact:**

Debbie Cahalin-  
Heath  
Strategic Manager -  
Regulation &  
Communities  
[debbie.cahalin-heath@coventry.gov.uk](mailto:debbie.cahalin-heath@coventry.gov.uk)

**Chief Officer of Police:**

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

**Contacts:**

[cv\\_licensing@west-midlands.pnn.police.uk](mailto:cv_licensing@west-midlands.pnn.police.uk)

**Fire Authority**

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

**Contact:**

[firesafety.admin@wmfs.net](mailto:firesafety.admin@wmfs.net)

**Safeguarding Children Board**

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

**Contacts:**

[safeguardingchildrenlicensing@coventry.gov.uk](mailto:safeguardingchildrenlicensing@coventry.gov.uk)

**Health & Safety Enforcing Authority**

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

**Contacts:**

Food and Health & Safety  
[ehcommercial@coventry.gov.uk](mailto:ehcommercial@coventry.gov.uk)

**Environmental Protection**

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

**Contacts:**

Environmental Protection  
[Env.protection@coventry.gov.uk](mailto:Env.protection@coventry.gov.uk)

**Trading Standards**

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

**Contact:**

Trading Standards/Business  
Compliance  
[tradingstandards@coventry.gov.uk](mailto:tradingstandards@coventry.gov.uk)

**Public Health Board**  
Coventry City Council  
PO Box 7097  
Coventry  
CV6 9SL

**Contact:**  
Public Health  
[publichealthlicensing@coventry.gov.uk](mailto:publichealthlicensing@coventry.gov.uk)

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

**Contact:**  
Planning  
[planning@coventry.gov.uk](mailto:planning@coventry.gov.uk)

**Secretary of State (Home Office  
Immigration Enforcement)**

**Contact**  
[ie.licensing.applications@homeoffice.gov.uk](mailto:ie.licensing.applications@homeoffice.gov.uk)

#### OTHER USEFUL CONTACTS:

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

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

Email: [events@coventry.gov.uk](mailto:events@coventry.gov.uk)

**Obtain a basic disclosure  
DBS for your Personal  
Licence**

[Request a basic DBS check -  
GOV.UK](https://www.gov.uk)

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

**Telephone: 024 7697 9456**

**e-mail: [licensing@coventry.gov.uk](mailto:licensing@coventry.gov.uk)**

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## Public Report Cabinet Member

Audit and Procurement Committee

21 July 2025

Cabinet Member for Policing and Equalities

28 July 2025

### **Name of Cabinet Member:**

Cabinet Member for Policing and Equalities - Councillor A S Khan

### **Director Approving Submission of the report:**

Director of Law and Governance

### **Ward(s) affected:**

None

### **Title:**

Annual Compliance Report 2024 - Regulatory & Investigatory Powers Act 2000 (RIPA)

### **Is this a key decision?**

No

### **Executive Summary:**

The Regulation of Investigatory Powers Act 2000 (RIPA) enables the Council to use covert surveillance; covert human intelligence sources (CHIS); and the acquisition of service use or subscriber information in relation to communications data in a manner that is compatible with Article 8 of the European Convention on Human Rights governing an individual's right to respect for their private and family life, home and correspondence.

The Council uses powers under RIPA to support its core functions for the purpose of prevention and detection of crime where an offence may be punishable by a custodial sentence of 6 months or more or are related to the underage sale of alcohol and tobacco. There are three processes available to local authorities under RIPA: the acquisition and disclosure of communications data; directed surveillance; and covert human intelligence sources ("CHIS").

The Act sets out the procedures that the Council must follow if it wishes to use directed surveillance techniques or acquire communications data in order to support core function activities (e.g. typically those undertaken by Business Compliance and Environmental Health). The information obtained as a result of such operations, can later be relied upon in court proceedings providing RIPA is complied with.

The Home Office Code for Covert Surveillance and Property Interference recommends that Elected Members, whilst not involved in making decisions or specific authorisations for the local authority to use its powers under Part II of the Act, should review the Council's use of the legislation and provide approval to its policies. The Council adopted this approach for oversight of the authority's use of Parts I and II of the Act.

**Recommendations:**

The Audit and Procurement Committee is requested to:

- 1) Consider and note the Council's use and compliance with RIPA.
- 2) Forward any comments and/or recommendations to the Cabinet Member for Policing and Equalities.

The Cabinet Member for Policing and Equalities is requested to:

- 1) Consider any comments and/or recommendations provided by the Audit and Procurement Committee.
- 2) Approve the report as a formal record of the Council's use and compliance with RIPA.

**List of Appendices included:**

None

**Other useful background papers:**

None

**Other useful background information:**

None

**Has it been or will it be considered by Scrutiny?**

No

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

Yes – Cabinet Member for Policing and Equalities on 28 July 2025

**Will this report go to Council?**

No

## **Report title: Annual Compliance Report 2024 – Regulatory & Investigatory Powers Act 2000 (RIPA)**

### **1. Context (or background)**

- 1.1 RIPA governs the acquisition and disclosure of communications data and the use of covert surveillance by local authorities. The Council can only use powers under RIPA to support its core functions for the purpose of prevention and detection of crime.
- 1.2 There are different thresholds that need to be met before any surveillance can be undertaken. In the case of Directed Surveillance or the use of Covert Human Intelligence Sources (CHIS) an offence has to be punishable by a custodial sentence of 6 months or more or the offence is related to the underage sale of alcohol and/or tobacco. In the case of Communications Data an offence has to be punishable by a custodial sentence of 12 months or more (e.g. offences relating to counterfeit goods which carry a maximum penalty of 10 years in prison).
- 1.3 Where the above criteria are met, local authorities can make an application for the acquisition and disclosure of communications data (such as telephone billing information or subscriber details) or directed surveillance (covert surveillance of individuals in public places); and the use of a CHIS (such as the deployment of undercover officers). The powers are most commonly used by Business Compliance. However, powers can also be used by other Council services if their offences meet the serious crime threshold, mentioned in paragraph 1.2 above.
- 1.4 RIPA and Codes of Practice set out the procedures that local authorities must follow when undertaking surveillance. These include approval by Authorised Council Officers for Directed Surveillance / CHIS applications to show that the proposed use of the powers is “necessary and proportionate”.
- 1.5 The Council is required to have a Senior Responsible Officer to maintain oversight of the RIPA arrangements, procedures and operations. The Council’s Monitoring Officer performs this function and is responsible for the integrity of the Council’s process for managing the requirements under RIPA.
- 1.6 Since 1 September 2017, the [Investigatory Powers Commissioner's Office](#) (IPCO) has been responsible for the judicial oversight of the use of covert surveillance by public authorities throughout the United Kingdom.
- 1.7 2019 saw the implementation of Part 3 of the Investigatory Powers Act 2016 (IPA). The introduction of this legislation has seen the most significant change to the acquisition of communications data in recent years. The IPA consolidates all existing powers available to law enforcement and other agencies. It radically overhauls the way these powers are authorised and overseen. The legislation also ensures that the powers conveyed are fit for the fast-moving digital age that we live in. The IPA has introduced the Office for Communications Data Authorisation (OCDA) which is now responsible for independently authorising all applications for communications data. This has removed the requirement for local authorities to seek judicial approval for communications data. In addition, the legislation has broadened the range of communications data available including access to location data.

1.8 The acquisition of communications data is undertaken through the National Antifraud Network (NAFN). They act as the single point of contact for many local authorities and ensure the application is RIPA/ IPA compliant. It is NAFN that are audited by the commissioners.

1.9 Details of the applications that the Council has made are set out below:

1.9.1 Use of Directed Surveillance or Covert Human Intelligence Sources

For the Period 1 January 2024 – 31 December 2024

The number of applications made for a Directed Surveillance authorization	0
The number of Directed Surveillance authorisations successfully granted	0
The number of Directed Surveillance authorisations that were cancelled	0
The number of Directed Surveillance authorisations extant at the end of the year	0

- There were no reported instances of the Council having misused its powers under the Act.

1.9.2 Use of Acquisition & Disclosure of Communications Data

No applications for the disclosure of communications data were made during the period 1 January 2024 – 31 December 2024.

1.10 Statistical Data

The IPCO require annual statistical data each year. The Annual Report of the Investigatory Powers Commissioner 2020 (last report at the time of writing, published 6 January 2022) is published on the IPCO website at the following link: <https://www.ipco.org.uk/publications/annual-reports/#:~:text=report%20in%20Parliament.,06%20January%202022,-Annual%20Report%202020> . Part 15 provides the findings relating to local authorities.

1.11 RIPA Training

It is recommended good practice to provide RIPA training to all relevant Officers periodically. Officers are currently reviewing and refreshing the Council policies (including procedural guidance) and it is anticipated that further training would be provided to Officers following the completion of the review and update workstream.

## **2 Options considered and recommended proposal**

### **2.1 The recommended proposal is that:**

- Audit and Procurement Committee consider and note the Annual Compliance Report, which sets out how the Council has used its powers during the reporting periods of the individual Commissioners. In addition, the Committee is recommended to forward any comments or recommendations to the Deputy Leader Policing and Equalities; and
- The Deputy Leader Policing and Equalities is recommended to consider any comments and/or recommendations from the Audit and Procurement Committee and approve the report as a formal record of the Council's use and compliance with RIPA.

### **2.2 The only other option is to "Do Nothing" which is not recommended as this would result in inadequate oversight and scrutiny by elected members on how the Council has used its powers during the reporting periods set out in this report**

## **3 Results of consultation undertaken**

### **3.1 Not applicable**

## **4. Timetable for implementing this decision**

### **4.1 The report will be a formal record of the Council's use of RIPA in 2024 when approved by the Cabinet Member for Policing and Equalities.**

## **5. Comments from the Director of Finance and Resources and the Director of Law and Governance**

### **5.1 Financial implications**

The Council has budget provision to cover the cost of the training, which will be delivered by an external trainer who specialises in RIPA legislation. There are no other direct financial implications arising from this report.

### **5.2 Legal implications**

There are no legal implications arising directly from this report.

The powers of local authorities have remained largely unchanged following the introduction of the Investigatory Powers Act 2016. However, Officers will continue to monitor the operation of RIPA and ensure that any amendments are incorporated into the Council's policy and procedures as appropriate.

Consideration and endorsement by Members, ensures that appropriate scrutiny is in place. Consideration of RIPA activity as recommended by the OSC guidance ensures that such activity is subject to appropriate scrutiny and authorisations.

## **6. Other implications**

Whilst the requirement to obtain judicial / OCDA approval introduced an additional step into the process, given the Council's low use of its powers under RIPA, it has not resulted in any significant delays for planned operations. Routine patrols, ad-hoc observations at trouble 'hot spots', immediate response to events and overt use of CCTV do not require RIPA authorisation.

### **6.1 How will this contribute to the achievement of the One Coventry Plan?** **(<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>)**

As and when judicial / OCDA approval is sought to use these powers, it will help support the Council's core aims by preventing and detecting crime associated with enforcement activities such as: investigations relating to counterfeiting and fraudulent trading activity, or underage sales of alcohol or tobacco.

### **6.2 How is risk being managed?**

The requirement for the Council to seek judicial / OCDA approval for any proposed use of its powers under the Regulation of Investigatory Powers Act 2000, as amended by the Protection of Freedoms Act 2012 and IPA, reduces the risk of the Council using such powers inappropriately or unlawfully. The RIPA (Directed Surveillance and CHIS) (Amendment) Order 2012 also restricted local authorities' ability to authorise directed surveillance under RIPA. This will help ensure any evidence gained from such use will be admissible in a court of law.

### **6.3 What is the impact on the organisation?**

There is no additional impact on the Council.

### **6.4 Equalities/EIA**

When submitting a request for authorisation to use RIPA, consideration is given to any impact on equalities.

### **6.5 Implications for (or impact on) climate change and environment?**

There are no implications on the environment.

### **6.6 Implications for partner organisations?**

There are no implications on partner organisations.



**Report author:****Name and job title:**

Oluremi Aremu

Head of Legal and Procurement Services

**Directorate:**

Law and Governance

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Enquiries should be directed to the above.

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Rob Back	Strategic Lead - Planning	Economy and Regeneration	26/06/2025	01/07/2025
Debbie Cahalin- Heath	Strategic Manager	Law and Governance	26/06/2025	30/06/2025
Sue Gilbert	Information Governance Officer	Law and Governance	26/06/2025	27/06/2025
Michelle Salmon	Governance Services Officer	Law and Governance	26/06/2025	26/06/2025
<b>Names of approvers for submission:</b> (officers and members)				
Davina Blackburn	Strategic Lead - Regulation and Communities	Law and Governance	01/07/2025	07/07/2025
Richard Shirley	Lead Accountant (Financial Management)	Finance and Resources	01/07/2025	01/07/2025
Julie Newman	Director of Law and Governance (Monitoring Officer)	-	01/07/2025	07/07/2025
Councillor A S Khan	Cabinet Member for Policing and Equalities	-	01/07/2025	08/07/2025

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