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Nottingham City Council Licensing Committee

Date: Friday, 6 May 2022

Time: 10.00 am

Place: Ground Floor Committee Room - Loxley House, Station Street, Nottingham,

NG2 3NG

Councillors are requested to attend the above meeting to transact the following business

Director for Legal and Governance

Governance Officer: Jane Garrard, Senior Governance Officer

Direct Dial: 0115 8764315

- 1 Apologies for absence
- 2 Declarations of Interests

3 Minutes
3 - 6
To confirm the Minutes of the meeting held on 4 October 2021

To confirm the Minutes of the meeting held on 4 October 2021

4 Review of Nottingham City Council Late Night Levy Scheme 7 - 22

Report of the Director for Community Protection

If you need any advice on declaring an interest in any item on the agenda, please contact the Governance Officer shown above, if possible before the day of the meeting.

Citizens are advised that this meeting may be recorded by members of the public. Any recording or reporting on this meeting should take place in accordance with the Council's policy on recording and reporting on public meetings, which is available at www.nottinghamcity.gov.uk. Individuals intending to record the meeting are asked to notify the Governance Officer shown above in advance.



Licensing Committee

Minutes of the meeting held at Loxley House, Station Street, NG2 3NG, on 4 October 2021 from 10.02 am - 10.28 am

Membership

Present Absent
Councillor Toby Neal (Chair) Councillo

Councillor Toby Neal (Chair)

Councillor Gul Nawaz Khan (Vice Chair)

Councillor Audrey Dinnall

Councillor Dave Liversidge

Councillor Nicola Heaton Councillor Mohammed Saghir
Councillor AJ Matsiko Councillor Linda Woodings

Councillor Wendy Smith
Councillor Cate Woodward

Colleagues, partners and others in attendance:

Richard Bines - Solicitor to the Committee

Paul Dales - Chief Environmental Health Officer

Mark Leavesley - Governance Officer

7 Apologies for Absence

Councillor Audra Wynter

Councillor Langton - other council business

Councillor Woodings - personal

8 Change in Membership

It was noted that Councillors Chantal Lee and Lauren O'Grady are no longer members of, and that Councillor Wendy Smith has been appointed to, this Committee.

9 Declarations of Interests

None.

10 Minutes

The Committee agreed the minutes of the last meeting held on 10 August 2021 as a correct record and they were signed by the Chair.

11 Cumulative Impact Assessment

Paul Dales, Chief Environmental Health Officer, presented the report, which advised the Committee of responses received (detailed in appendix 2 of the report) during a statutory consultation process, conducted in respect of the Council's draft Cumulative Impact Assessment (CIA) (detailed in appendix 1 of the report) in regards to the City Centre, Radford, Berridge and Arboretum areas and sought a decision as to whether or not to publish the draft CIA and, if so, in what terms in light of the consultation responses and officer advice given.

Page 3

Mr Dales stated that:

- the adoption of a CIA is a power, not a duty, and should be based on robust evidence, which is required to be set out in the CIA. As indicated in the body of the report, there have been some legitimate challenges to the evidential base and plans contained within the draft CIA;
- a common theme throughout the consultation responses was that insufficient weight had been placed on the effects of the pandemic on businesses and that more general consideration should be given to the benefits and effects that the hospitality industry has on the wider economy and vitality of the city centre in particular. It had also transpired that the plans and statistical information provided and contained in the draft CIA were incorrectly based on the City Centre area and Radford, Berridge and Arboretum area in their entirety, as opposed to the delineated cumulative impact zones designated by the current CIA and previous policies;
- in light of the above, it was recommended that the Committee does not adopt the
 proposed CIA at this time and that officers re-focus their considerations and
 evidence gathering to look at a more holistic picture, including the effects of such
 policies on the hospitality industry and the economy alongside updated evidence
 of the problems having a large concentration of licensed premises can have, not
 only in terms of crime and anti-social behaviour but also in terms of health related
 statistics;
- the lapse of the current CIA will have an effect both on the Council's statement of Licensing Policy and on the Committee's terms of reference. Proposals in relation to the Licensing Policy are therefore set out in the report in this regard.

During discussion, and in response to questions, Mr Dales stated the following:

- Licensing Panels will retain the remit of hearing applications for premises within the CIA, rather than there being a necessity for submission of such applications to a full Licensing Committee meeting;
- ii. areas of the City with current and future student accommodation developments, such as Huntingdon Street, will be considered for inclusion in the new CIA, with possible boundary changes if required based upon the evidence gathered;
- iii. in respect of concerns raised by members regarding 'pre-loading', measures to prevent it were not within the remit of the CIA policy itself and could not be included in a future CIA and Mr Dales reminded the Committee that a CIA policy relates to the number of relevant authorisations in respect of premises in an area described in an assessment, and an evidence based determination, having regard to cumulative impact, of whether there would be problems which undermined the licensing objectives if a further application were granted.

Resolved that the Committee

(1) notes the consultation responses and officer's comments as detailed in appendix 2;

- (2) determines not to publish the Council's CIA at this time;
- (3) agrees to amend its terms of reference to that as set out in appendix 4.



Licensing Committee – 6 May 2022

Title of paper:	Review of Nottingham City Council Late Night Levy Scheme			
Director(s)/	Andrew Errington		Wards affected:	
Corporate Director(s):	Director of Community	Protection	All	
Report author(s) and	Melanie Bird			
contact details:	Licensing Compliance	Manager		
	melanie.bird@nottingha			
	07903702608	3 - 1		
	Paul Dales			
	Chief Environmental He	ealth Officer		
	07983 334708			
	paul.dales@nottingham	ncitv.aov.uk		
Other colleagues who	Ann Barrett,	- · · · · · · · · · · · · · · · · · · ·		
have provided input:	Team Leader, Legal Se	ervices		
•	0115 8764411			
	ann.barrett@nottinghar	ncity.gov.uk		
Date of consultation with Portfolio Holder(s) Councillor Neghat Khan			t Khan	
(if relevant) 29 March				
Does this report contain	n any information that i	s exempt from pu	blication? No	
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Relevant Council Plan R Clean and Connected Co		_		
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Keeping Nottingham Wor	King [\dashv		
Carbon Neutral by 2028				
Safer Nottingham	_	⟨		
Child-Friendly Nottinghan	u li			
Healthy and Inclusive	.			
Keeping Nottingham Mov	ing [\exists		
•	Improve the City Centre			
Better Housing		\dashv		
Financial Stability				
Serving People Well				
Summary of issues (including benefits to citizens/service users):				
Junimary or issues (including beliefits to citizelis/service users).				
This report seeks approval to commence a statutory consultation on the proposal to revoke the Late				
Night Levy (LNL) scheme with effect from the end of the levy period on 31 October 2022 . Any				
recommendation to implement the proposal following consultation will require Full Council approval.				
and the first of the special and a second and a second approximation and a				
Recommendation(s):				
1 That the Licensing Committee authorise a period of statutory consultation seeking views on				
	the revocation of the Late Night Levy scheme to take effect from the end of the levy period on			
31 October 2022.				

1. Reasons for recommendations

- 1.1 The pandemic business restrictions' regulations highlighted the financial pressures on businesses and that the revocation of the levy could be considered as an approach to reduce that burden. The Invest in Nottingham business growth strategy promotes and supports investment in the city and the LNL costs may be considered a barrier to incoming or expanding businesses.
- 1.2 The option for removal of the LNL annual payments reduces the financial burden on licensed trade businesses. The hospitality sector has come under severe pressure in the last 24 months during the pandemic because of the restricted trading conditions. This may assist in the viability of existing businesses but also those considering opening in the city which may by virtue of their planned opening hours be liable for the LNL fee. This could support revitalising the economy within this business sector.
- 1.3 Approval is required from the Licensing Committee to start a formal consultation process seeking views about the following proposal to;
 - Cease the Late Night Levy from 31 October 2022.

2. Other options considered in making recommendations

- 2.1 To retain the current established arrangements for the Late Night Levy however a formal review was deemed appropriate given the significant financial pressures faced by businesses.
- 2.2 At present it is not appropriate to vary the levy due to overriding financial pressure on businesses and the revocation of the levy will resolve the burden on businesses. Any viewpoints arising from the consultation will be considered.

3. Background (including outcomes of consultation)

- 3.1 The Police Reform and Social Responsibility Act 2011 empowers Licensing Authorities to charge a LNL to persons licensed to sell alcohol late at night as means of raising a contribution to fund services to tackle late night alcohol-related crime and disorder and services connected to the management of the night-time economy. The levy is payable by the holders of relevant late night authorisations. These are the holders of any premises licence or club premises certificate in relation to premises in the authority's area, which authorise the sale or supply of alcohol on any days during a period (the "late night supply period") beginning at or after midnight and ending at or before 6am. The levy must be applied throughout the whole of the Council's area although the Council has a discretion in the design of the levy scheme and can provide discounts or exemptions for certain holders of relevant late night authorisations as prescribed by Regulation.
- 3.2 In making a decision that a LNL is to apply to its area the authority must consider:
 - a) the costs of policing and other arrangements for the reduction or prevention of crime and disorder, in connection with the supply of alcohol between midnight and 6 am, and
 - (b) having regard to those costs, the desirability of raising revenue to be applied in accordance with section 131 of the Act which requires not less than 70% of the net levy to be paid to the police.

The Council's proportion of the LNL must be spent on tackling late night alcohol related crime and disorder however there are no restrictions on what the police can spend their proportion on.

- 3.3 On 14 July 2014 Full Council approved the following LNL scheme with the levy period running from 1 November 31 October each year:
 - (1) the Levy to apply from 1 November 2014;
 - to be charged to premises that are authorised to sell alcohol at any time between 00:01 06:00;
 - (3) an exemption for premises falling within the following categories as defined in Regulation 4 of the late Night Levy (Expenses, Exemptions and Reductions) Regulations 2012:
 - (a) Premises with overnight accommodation
 - (b) Theatres and cinemas
 - (c) Bingo halls
 - (d) Community Amateur Sports Clubs
 - (e) Community premises
 - (f) Premises which are a member of a BID established for relevant purposes
 - (g) Premises which only become liable for the Late Night Levy by virtue of their being permitted to supply alcohol for consumption on the premises on 1st January in every year
 - (4) the funds raised, net of the administration costs incurred by the Licensing Authority, be split 30/70 between the Licensing Authority and the Police respectively;
 - (5) the Licensing Authority's portion of the funding to be used throughout the City to support the prevention of crime and disorder caused by the night time economy during the hours of the levy. This will be achieved through the establishment of two night time Community Protection Officer posts.
- 3.4 The amount of levy, is based on the rateable value of the premises and the fees paid are currently:
 - Band A £299.00
 - Band B £768.00
 - Band C £1259.00
 - Band D £1365.00
 - Band E £1495.00
 - Band D+ not applicable to any premises currently in the levy
 - Band E + £4440.00

There are currently the following number of premises in each rateable band:

- A 19
- B 71
- C 21
- D-9
- E 22
- D+ 0
- E+-2

- 3.5 The LNL remains in place in the terms agreed in 2014 until such time as it is reviewed or removed following full and open consultation with those parties defined in the Act (Police & Crime Commissioner, Chief Officer of Police, holders of premises licences issued under the Licensing Act 2003 where the scheme applies or will apply).
- 3.6 Income received from the current LNL is not Council budget, merely a conduit for collection and transferral of 70% to the Police and Crime Commissioner of the net amount. The Council is entitled to deduct its administrative costs for collection (currently £22k) prior to the net amount being apportioned.
- 3.7 As indicated above, the BID was provided with an exemption from the LNL. This was because the BID already contributed to managing anti-social behaviour in the night time economy and was involved in projects that targeted retail and leisure issues including delivering strong crime prevention measures in the night time economy. Nottingham BID also took responsibility for the business crime reduction partnership in the city, including the provision of the city centre radio scheme and provision of Taxi Marshalls available every Friday and Saturday between 10pm and 4am. As such, the Nottingham BID had a strong crime and disorder focus. As the BID did not meet the statutory criteria allowing a reduction to be applied it was felt more appropriate to exempt those premises within the BID area from the levy rather than them having to pay both the BID and LNL charges. In return, the BID was required to invest money into providing community safety services for the NTE.

This exemption remains in place to date.

3.8 There are currently **109 premises** eligible under the BID exemption the cost of which is currently estimated to be around £129,500 as detailed below;

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Band A – £299 – 0 premises

Band B – LNL fee £768, 31 premises – total £23,808.00

Band C – LNL fee £1259.00, 37 premises – total £46,583.00

Band D – LNL fee £1365.00, 16 premises – total £21,840.00 and Band E – LNL fee £1493.00, 25 premises – total £37,325.00
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Overall total - £129,556.00

- 3.9 Income was heavily reduced after year one commencement as operators were allowed to submit a free minor variation to reduce the hours on their premises licence they either didn't use or to move their hours to pre-midnight so as to no longer be liable to pay.
- 3.10 For the period 1 November 2020 31 October 2021 the level of income received from the LNL was £133,851.00. As this period spanned the long periods of Covid 19 lockdown when most late-night operators could not open, the LNL fees were payed for one year only on their behalf by the Council through Additional Restrictions Grant (ARG) funding.
- 3.11 There are currently **144 Premises** in the City boundary that are liable to pay the LNL. These are business that operate after midnight and are not BID members. This fact indicates that the LNL now disproportionately impacts on businesses located outside the city centre in the local community areas where there is a reasonable but non-confirmed assumption that it impacts on the demographic population reflective of these

areas. These local businesses are likely to have a characteristic makeup that is predominantly:

- Family owned
- Single premises rather than franchise/multi outlet operations
- Entry level small business operations
- BAME owned enterprises.
 Of these premises 48 in the city centre with an NG1 postcode and 96 outside of the city centre that currently pay the LNL. The 48 premises in the city centre broadly have a higher rateable value than those outside the centre.

4. Finance colleague comments (including implications and value for money)

- 4.1 Late Night Levy was implemented by Nottingham City Council in 2014 with the purpose to help offset the cost of policing the night-time economy. Upon implementation in 2014, the Business Improvement District (BID) were provided with an exemption, meaning that all licenced premises covered by the BID area would not have to pay the levy which reduced the expected funding this exemption is circa £0.129m which was higher than originally anticipated. An income saving was put in place of £0.080m against this levy in 2014.
- 4.2 As this levy has remained in place during a period which spanned the periods of Covid 19 lockdown when most late-night operators could not open, the LNL fees were paid for one year only on their behalf by the Council through Additional Restrictions Grant (ARG) funding which was received from Department for Business Energy and Industrial Strategy (BEIS).
- 4.3 The Council will be required to publish a notice setting out its intention to make a decision that the LNL will cease to have effect in the City. The notice must be publicised and sent to affected licence holders, the Chief Officer of Police and the Police and Crime Commissioner as key stakeholders. The Levy will have financial implications for both Nottingham City Council and the Police and Crime Commissioner as the income from the levy is split between them on a 30% and 70% split respectively (excluding an initial £0.022m for allowable expenses to be retained by the Council).
- 4.4 The LNL can only cease on its anniversary dates and therefore the suggested end date would be 31st October 2022. The cessation of this Levy will leave the current income target unachieved within the Service which has over the interim years increased to a total of £0.090m. No funding has been identified to mitigate this as the admin aspects are covered within a centralised Licensing Team. There would be a part year impact in both 2022 and the remaining in 2023 to the end of the final year of levy.

Susan Turner - Senior Commercial Business Partner

5. Legal colleague comments

- 5.1 Matters relating to the introduction and administration of the LNL are non-executive functions. Under the Council's constitution Licensing Committee has the power to consider putting proposals relating to the scheme out to consultation but any final decisions are required to be made by full Council (as Licensing Authority)
- 5.2 Whilst the Council has a wide discretion in relation to the operation of the LNL it was obliged to have regard to the costs of policing and other arrangements for the reduction

and prevention of crime and disorder in connection with the supply of alcohol between midnight and 6am and the desirability of raising revenue to be applied to tackle alcohol related crime and disorder and the management of night time economy. These would also be relevant considerations when considering if the scheme should be amended or cease to apply.

- 5.3 There is a statutory requirement to consult the relevant local policing body, the chief officer of Police and holders of late night authorisations before a final decision is made as well as various advertising requirements which will to be met before a final decision on this matter may be taken.
- 5.4 As the current recommendation is to merely put the proposal out for consultation there is little risk at this stage however the final decision will be open. to judicial review on the usual administrative law grounds.
- 6. Crime and Disorder Implications (If Applicable)
- 6.1 Not applicable
- 7. Social value considerations (If Applicable)
- 7.1 Not applicable
- 8. Regard to the NHS Constitution (If Applicable)
- 8.1 Not applicable
- 9. Equality Impact Assessment (EIA)
- 9.1 Has the equality impact of the proposals in this report been assessed?

Yes X

Attached as Appendix 1, and due regard will be given to any implications identified in it.

- 10. Data Protection Impact Assessment (DPIA)
- 10.1 Has the data protection impact of the proposals in this report been assessed?

No X

A DPIA is not required because it is not applicable to the proposal

- 11. Carbon Impact Assessment (CIA)
- 11.1 Has the carbon impact of the proposals in this report been assessed?

No X

A CIA is not required because it is not applicable to the proposal

- 12. List of background papers relied upon in writing this report (not including published documents or confidential or exempt information)
- 12.1 None

13. Published documents referred to in this report

13.1 Police Reform and Social Responsibility Act 2011, Chapter 2 of Part 2
The Late Night Levy (Application and Administration) Regulations 2012
The Late Night Levy (Expenses, Exemptions and Reductions) Regulations 2012



Equality Impact Assessment Form

screentip-sectionA

1. Document Control

Control Details:

Title: If this is a budget EIA please ensure the title is the same as the title used within the budget booklet	Review of Nottingham City Council Late Night Levy Scheme
Author:	Paul Dales
Director:	Andrew Errington
Department:	Community Protection
Service Area:	Licensing
Contact details:	Paul Dales, paul.dales@nottinghamcity.gov.uk Tel: 07983 334708
Strategic Budget EIA: Y/N (Does this EIA have an impact on the budget) If yes, please include the reference number	Income received from the current Late Night Levy is not Council budget, merely a conduit for collection and transferral of 70% to the Police & Crime Commissioner of the net amount. The Council takes £22k administration costs prior to the net amount being apportioned and the remaining 30% is allocated for Council use for the provision of Community Protection Officers in the Night Time Economy.
Exempt from publication: Y/N (All EIA's are published on Nottingham Insight for public viewing unless specified. Exemption criteria is available on the EIA section on the Intranet)	N

2. Document Amendment Record:

Version	Author	Date	Approved
V.1	Paul Dales	20 April 2022	

3. Contributors/Reviewers (Anyone who has contributed to this document will need to be named):

Name	Position	Date
Rosey Donovan	Equality and Employability Consultant	25/04/2022

4. Glossary of Terms

Term	Description
LNL	Late Night Levy
NTE	Night Time Economy
BID	Business Improvement District
BAME	Black, Asian and Minority Ethnic
Licensing Committee	The Licensing Committee meets as and when required and consists of 13 Councillors. The Licensing Committee oversees the development and application of the Council's Licensing Policy ensuring it is in line with the Licensing Act 2003 and Gambling Act 2005. It establishes Licensing Panels and the Special Licensing Panel to determine individual applications for licences in cases where objections have been received and when licences need to be reviewed.

screentip-sectionB

5. Summary

(Please provide a brief description of proposal / policy / service being assessed)

Nottingham City Council currently operates a Late Night Levy scheme that was introduced on the 1 November 2014 following the implementation of The Police Reform and Social Responsibility Act 2011. The Late Night Levy scheme is payable by holders of premises licences issued under the Licensing Act 2003 that have alcohol sales permitted on their premises licences that permits sales of alcohol between 12.00 midnight and 06.00 am.

There are exemptions to paying the Late Night Levy fee for premises licence holders that are:

- Members of the BID Scheme
- Premises with overnight accommodation (if guests at the premises are being sole alcohol the premises are not then exempt from the levy)
- Theatres and Cinemas
- Bingo Halls
- Community Premises
- Premises which only being liable to pay the levy by virtue of them being permitted to have alcohol sales on the 1 January each
 year

The review of the Nottingham City Council Late Night Levy scheme is seeking approval by Licensing Committee on the 6 May 2022 to commence a statutory consultation to revoke the Late Night Levy scheme.

The consultation that takes place will determine the outcome of the scheme and will be bought back to Full Council in September 2022 for a decision to be made. For guidance around consultation please visit http://intranet.nottinghamcity.gov.uk/analysis-and-insight/

he pandemic business restrictions' regulations highlighted the financial pressures on businesses and that the revocation of the Late hight Levy could be considered as an approach to reduce that burden. The Invest in Nottingham business growth strategy promotes and supports investment in the City and the Late Night Levy costs may be considered a barrier to incoming or expanding businesses.

The option for removal of the Late Night Levy annual payments reduces the financial burden on licensed trade businesses. The hospitality sector has come under severe pressure in the last 24 months during the pandemic because of the restricted trading conditions. This may assist in the viability of existing businesses but also those considering opening in the city which may by virtue of their planned opening hours be liable for the Late Night Levy fee. This could support revitalising the economy within this business sector.

There are currently 144 Premises in the City boundary that qualify to pay the LNL. These are business that operate after midnight and are not BID members. This fact indicates that the LNL now disproportionately impacts on businesses located outside the city centre in the local community areas where there is a reasonable but non-confirmed assumption that it impacts on the demographic population reflective of these areas. These local businesses are likely to have a characteristic makeup that is predominantly:

- Family owned
- Single premises rather than franchise/multi outlet operations
- Entry level small business operations

BAME owned enterprises.

The scheme operates under specific legislation as below;

Sections 133 & 134 of the Police Reform and Social Responsibility Act 2011 and the LNL (Application and Administration) Regulations 2012 sets out the statutory procedure that must be followed by the council when making a decision to vary the Late Night Levy.

The Council will be required to publish a notice setting out its intention to make a decision that the Late Night Levy will be amended or cease to have effect in the City. The notice will be publicised and sent to affected licence holders, the Chief Officer of Police and the Police & Crime Commissioner.

Section 133(7)(a) makes it clear that a decision for the Late Night Levy to be amended or cease to have effect can only take effect at the end of the current levy period. In Nottingham's case this will be on 31 October 2022.

Screentip-sectionC

6. Information used to analyse the effects on equality:

(Please include information about how you have consulted/ have data from the impacted groups)

The Review of the Late Night Levy Scheme will be presented to Licensing Committee for approval to commence a consultation with affected Premises Licence Holders, The Chief Officer of Police and the Police and Crime Commissioner.

The results of the consultation will be bought back to Full Council in September 2022 for a decision to be made as to whether to revoke the Late Night Levy scheme.

7. Impacts and Actions:

screentip-sectionD	Could particularly benefit X	May adversely impact X
People from different ethnic groups.	X	
Men	X	
Women	X	
Trans		
Disabled people or carers.		
Pregnancy/ Maternity		
People of different faiths/ beliefs and those with none.		
Lesbian, gay or bisexual people.		
Older		
age ounger		
Other (e.g. marriage/ civil partnership, looked after children, cohesion/ good relations, vulnerable children/ adults).		
Please underline the group(s) /issue more adversely affected or which benefits.		
Persons in the groups identified will benefit financially as the requirement to pay a late night levy will no longer exist.		

screentip-sectionE	screentip-sectionF
How different groups could be affected	Details of actions to mitigate, remove or justify negative impact or increase positive impact (or why action isn't possible)
(Summary of impacts)	(or why action isn't possible)

Provide details for impacts / benefits on people in different protected groups.

Note: the level of detail should be proportionate to the potential impact of the proposal / policy / service. Continue on separate sheet if needed (click and type to delete this note)

There are no negative impacts on any group with protected characteristics.

The review of the Late Night Levy scheme will affect all Premises Licence Holders that hold a Premises Licence issued under the Licensing Act 2003 that permits the sale of alcohol between 12.00 midnight and 06.00 am (unless exempt by virtue of exemptions).

Page 20

8. Arrangements for future monitoring of equality impact of this proposal / policy / service:

Should a decision be made at Full Council to revoke the scheme, then a decision to re-introduce the scheme in the City can be made at any time.

9. Outcome(s) of equality impact assessment:

	Adjust the policy/proposal
☐ Adverse impact but continue	Stop and remove the policy/proposal

10. Approved by (manager signature) and Date sent to equality team for publishing:

Approving Manager: The assessment must be approved by the manager responsible for the service/proposal. Include a contact tel & email to allow citizen/stakeholder feedback on proposals.	Date sent for advice: Send document or Link to: equalities@nottinghamcity.gov.uk
Approving Manager Signature: Paul Dales Chief Environmental Health Officer	Date of final approval: 20 April 2022



Before you send your EIA to the Equality and Employability Team for advice, have you:

- 1. Read the guidance and good practice EIA's http://intranet.nottinghamcity.gov.uk/media/1924/simple-guide-to-eia.doc
- 2. Clearly summarised your proposal/ policy/ service to be assessed.
- 3. Hyperlinked to the appropriate documents.
- 4. Written in clear user-friendly language, free from all jargon (spelling out acronyms).
- 5. Included appropriate data.
- 6. Consulted the relevant groups or citizens or stated clearly, when this is going to happen.
- 7. Clearly cross-referenced your impacts with SMART actions.

PLEASE NOTE: FINAL VERSION MUST BE SENT TO EQUALITIES OTHERWISE RECORDS WILL REMAIN INCOMPLETE.