

Item No. 6.	Classification: Open	Date: 15 June 2017	Meeting Name: Licensing Sub-Committee
Report title:		Licensing Act 2003: Superdeals (Food and Wine), 4 Camberwell Church Street, London SE5 8QU	
Ward(s) or groups affected:		Brunswick Park	
From:		Strategic Director of Environment and Social Regeneration	

RECOMMENDATION

1. That the licensing sub-committee considers an application submitted by this council's trading standards service under Section 51 of the Licensing Act 2003 (the Act) for the review of the premises licence held by Mohammed Imran and Ghulam Rasool in respect of the premises known as Superdeals (Food and Wine), 4 Camberwell Church Street, London SE5 8QU.
2. Notes:
 - a) The grounds for the review are stated in paragraph 12-14 of this report. A copy of the premises licence review application is attached as Appendix A as is an additional supporting email from the applicant dated 31st May 2017.
 - b) The review application is supported by representations submitted by responsible authorities. Copies of the representations are attached as Appendix B. Details of the representations are provided in paragraphs 16 – 19.
 - c) A copy of the current premises licence issued in respect of the premises is attached to this report as Appendix C. A map of the area that the premises are located in is attached as Appendix E.
 - d) A copy of the council's approved procedure for hearings of the sub-committee in relation to an application made under the Licensing Act 2003, along with a copy of the hearing regulations, has been circulated to all parties to the meeting.

BACKGROUND INFORMATION

The Licensing Act 2003

3. The Licensing Act 2003 provides a licensing regime for:
 - The sale of and supply of alcohol
 - The provision of regulated entertainment
 - The provision of late night refreshment
4. Within Southwark, the licensing responsibility is wholly administered by this council.

5. The Act requires the licensing authority to carry out its functions under the Act with a view to promoting the four stated licensing objectives. These are:
 - The prevention of crime and disorder
 - The promotion of public safety
 - The prevention of nuisance
 - The protection of children from harm.
6. In carrying out its licensing functions, a licensing authority must also have regard to:
 - The Act itself
 - The guidance to the act issued under Section 182 of the Act
 - Secondary regulations issued under the Act
 - The licensing authority's own statement of licensing policy
 - The application, including the operating schedule submitted as part of the application
 - Relevant representations
7. The applications process involves the provision of all relevant information required under the Act to the licensing authority with copies provided by the applicant to the relevant responsible bodies. The application must also be advertised at the premises and in the local press. The responsible authorities and other persons within the local community may make representations on any part of the application where relevant to the four licensing objectives.
8. The premises licence once issued remains valid for the life of the business unless surrendered or revoked. However, under section 51 of the Act it remains open to any responsible authority or other person to apply to the local licensing authority for a review of the premises licence where there are ongoing concerns regarding one or more of the four stated licensing objectives.

KEY ISSUES FOR CONSIDERATION

The premises licence

9. The premises licence allows the provision of licensable activities as follows:
 - The sale of alcohol to be consumed off the premises: Monday to Sunday 00:00 to 00:00
 - There are also no restrictions in respect of the premises' standard opening times (it can therefore be open 24hours-a-day).
10. The licence is subject to the mandatory conditions set down under the Act and further conditions consistent with the operating schedule submitted with the application for the licence. A copy of the full premises licence is attached as Appendix C.

Designated premises supervisor (DPS)

11. The current Designated Premises Supervisor (DPS) named on the licence is Mahesh Mhatre since 31 January 2017.

The review application

12. On 1 April 2017, an application was submitted by this council's trading standards service under Section 51 of the Licensing Act 2003, for the review of the premises licence held by Mohammed Imran and Ghulam Rasool in respect of the premises known as Superdeals (Food and Wine), 4 Camberwell Church Street, London SE5 8QU.
13. The review application was submitted in respect of the prevention of crime and disorder, public safety and the protection of children from harm licensing objectives and in summary states that the following has been witnessed and / or taken place at the premises:

Prevention of Crime and disorder:

- Sale of alcohol when there was no designated premises supervisor (breach of condition 100) - various dates
- Sale of alcohol to a child (an offence under Section 146 of the Licensing Act 2003)
- Numerous breaches of premises licence conditions relating to CCTV, notices, age verification, personal licence holder not on premise (various dates), untrained staff
- Offer and sale of alcohol below duty price (breach of mandatory condition 491)
- Failure to make available copy of the premises licence (an offence under Section 57 of the Licensing Act 2003)
- Failure to produce traceable invoices for super strength beers (an offence under the General Food Hygiene Regulations 2013)

Public Safety:

- Breaches of premises licence conditions (conditions 100, 341, 342 343, 344 and 2470 - lack of notices re personal safety, CCTV (condition 289).

Protection of children from harm:

- Sale of alcohol to a child (an offence under Section 146 of the Licensing Act 2003)
 - Failure to adopt an age verification scheme (condition 334)
 - Failure to operate a refused sales register (condition 340)
 - Failure to display notices detailing restrictions on sales to children (condition 344) and at each point of sale stating "No proof of age - no sale" (condition 347).
14. The sub-committee is invited to revoke the licence. The premises licence already has a comprehensive list of conditions that are not on many other premises licences in Southwark but no genuine attempts have been made to ensure these are complied with and therefore trading standards do not suggest any further conditions in this application.
 15. Full details of the grounds for the review are provided within review the application. A copy of the review application is attached as Appendix A which is accompanied by an email dated 31 May 2017 which provides additional supporting information,

further to the date the review documents were served on the premises licence holder.

Representations from responsible authorities

16. The Metropolitan Police Service, this council's director of public health and this council's licensing responsible authority have submitted representations in support of the review application.
17. The Metropolitan Police Service's representation notes that the review application details a significant number of Breaches of the premises licence and a number of offences with regard to duty evaded alcohol and the Consumer Protection Act. The police fully support the application by trading standards for the review of the premises licence and the recommendation that the licence is revoked.
18. The director of public health's representation is submitted in respect of all four licensing objectives. The representation expresses concerns over the offences alleged in the review application. The director of public health fully supports that the premises licence be reviewed by the licensing sub-committee.
19. The licensing responsible authority's representation is submitted in respect of the prevention of crime and disorder, the prevention of public nuisance and protection of public safety licensing objectives. The representation notes that in addition to the evidence in the review application, the premises has been inspected by licensing officers on numerous occasions resulting in breaches of licence conditions being observed and warning letters issued to the licensees and other relevant persons. The representation also notes that the duty manager of the premises took part in an induction interview during which the licence was fully explained to the duty manager and the possible consequences of breaching licence conditions was also explained. The representation further notes that the premises were subject to a closure notice under section 19 of the Criminal Justice and Police Act 2001. The Licensing Responsible Authority have no confidence in the licensees or duty manager to operate the premises compliantly and fully support the review application and recommendation in the application that the premises licence be revoked.
20. Copies of the representations are attached as Appendix B.

Representations from other persons

21. No representations have been received by other persons.

Operating History

22. A premises licence was issued in respect of the premises on 9 April 2008. The licence was granted to the current licence holders, Mohammed Imran and Ghulam Rasool.
23. On 29 December 2012 a visit by the night time economy team inspected the premises and found, no training records, no personal licence holder on site and missing notices regarding police, awareness of pickpockets and a contact name for customers. A warning letter was sent out. Copies of all warning letters to the premises are available in Appendix B as part of the supporting representation made by the licensing authority.

24. On 6 April 2014 licensing enforcement officers attended the premises which was not compliant. No personal licence holder or DPS was at the premises.
25. On 22 August 2015 a full inspection of the premises was undertaken, despite three staff being present at the time, they were unable to show CCTV footage, so it could not be sure that it was working. In addition, there were no notices in accordance with conditions 341-345 and no full licence available.
26. On 2 November 2015, licensing enforcement officers carried out an inspection to determine whether the licensable activities at the above premises were carried out in accordance with the premises licence issued in respect of the premises.
27. During the inspection the officers witnessed the following:
 - 1) It was not possible to ascertain if the CCTV system at the premises has a 31 day recording capacity as required by **condition 289** of the premises licence.
 - 2) Footage from the CCTV system could not be made available to the inspecting officers on as required by **condition 289**.
 - 3) There was no signage displayed, as required by **condition 341**, informing customers that the police will be informed in the event of any individual being found in possession of controlled substances or offensive weapons.
 - 4) There was no signage displayed, as required by **condition 342**, informing customers about the need to be aware of pickpockets or bag snatchers, and to guard their property, or unattended bags.
 - 5) There was no signage displayed, as required by **condition 343**, displaying the name of a contact for customers if they wish to report concerns.
 - 6) Each of the matters listed above potentially constitutes a breach of the licence issued by the council under the Licensing Act 2003.
 - 7) It was apparent that the person left in charge of the premises was not aware of the premises licence issued in respect of the premises or its terms and conditions. Please ensure that all staff employed at the premises are aware of the terms and conditions of the premises licence and have received training in respect of it.
 - 8) The staff member present at the time of the visit displayed a lack of knowledge as to the acceptable forms of identification that can be accepted as proof of age in regards to the sale of alcohol – a training pack in regards to age restricted products is enclosed. All members of staff at the premises should read the training pack and complete the training record included with it.
 - 9) It is recommended that all staff members who do not have a personal licence are authorised in writing by the designated supervisor (DPS) of the premises to make sales of alcohol. Should you require it, please find enclosed a letter of authorisation template. If you use the authorisation template please keep it at the premises.
28. A warning letter was provided to the premises licence holders, a copy of that letter is attached to Appendix D.

29. On 28 January 2017, a test purchase was carried out at the request of trading standards further to information received that the designated premises supervisor had departed the business. Alcohol was sold.
30. On 31 January 2017, the premises applied for a vary DPS application, which was deemed as invalid. A letter was sent that day to advise, which is included in the supporting representation made by the licensing authority. A valid application was not received until 14 February 2017.
31. On 20 April 2017 an application was submitted by this council's trading standards service under Section 51 of the Licensing Act 2003, for the review of the premises licence held by Mohammed Imran and Ghulam Rasool in respect of the premises known as Superdeals (Food and Wine), 4 Camberwell Church Street, London SE5 8QU. The premises was visited by trading standards; the review documents were delivered. A non-personal licence holder was found to be working alone in the shop; he continued to sell alcohol despite being advised that it was an offence under the terms of the premises licence. The employee was also unable to operate the CCTV.
32. On 26 April 2017, the premises was visited by trading standards, the Metropolitan Police Service and the licensing authority. A member of staff was found to running the store alone, selling alcohol. He claimed to have a personal licence with Tower Hamlets. However, he has only made an application, which has not yet been granted. Additionally, he is a failed asylum seeker. He should not be working. He advised that he is appealing this ruling. This will therefore affect his ability to hold a personal licence.
33. No TEN's have been submitted in regards to the premises.

The local area

34. A map of the local area is attached as Appendix E. There are a number of licenced premises in the immediate vicinity, namely:

London Food and Wine, 12 Camberwell Church Street, SE5 8QU licensed for:

- The sale of alcohol to be consumed both off the premises:
 - Monday to Sunday 08:00 to 03:00 (the following day)

The Tiger , 18 Camberwell Green, London SE5 7AA licensed for:

- The sale of alcohol to be consumed on and off the premises:
 - Sunday to Thursday 09:00 to 01:30 (the following day)
 - Friday and Saturday 09:00 to 03:30 (the following day)
- The provision of late night refreshment (indoors):
 - Sunday to Thursday 23:00 to 01:30 (the following day)
 - Friday and Saturday 23:00 to 02:30 (the following day)
- The provision of regulated entertainment in the form of recorded music, live music, and performance of dance (indoors):
 - Monday to Thursday 09:00 to 02:00 (the following day)
 - Friday and Saturday 09:00 to 04:00 (the following day)
 - Sunday 09:00 to 01:00 (the following day)

Golden Grill, 20 Camberwell Green London SE5 7AA licensed for:

- The sale of alcohol to be consumed on the premises:
 - Monday to Saturday 11:00 to 02:00 (the following day)
 - Sunday 13:00 to 22:30
- The provision of late night refreshment (indoors):
 - Sunday to Thursday 23:00 to 02:00 (the following day)
 - Friday and Saturday 23:00 to 04:00 (the following day)

Hermits Cave, 28 Camberwell Church Street, London SE5 8QU licensed for:

- The sale of alcohol to be consumed on and off the premises:
 - Monday to Thursday 10:00 to 00:00 (midnight)
 - Friday and Saturday 10:00 to 02:00 (the following day)
 - Sunday 10:00 to 01:00 (the following day)
- The provision of late night refreshment (indoors):
 - Monday to Thursday 23:00 to 00:00 (midnight)
 - Friday and Saturday 23:00 to 02:00 (the following day)
 - Sunday 23:00 to 01:00 (the following day)
- The provision of regulated entertainment in the form of recorded music, live music, films, and performance of dance (indoors):
 - Monday to Thursday 10:00 to 00:00 (midnight)
 - Friday and Saturday 10:00 to 02:00 (the following day)
 - Sunday 10:00 to 01:00 (the following day)

Chicks Peri Peri Chicken, 5 Camberwell Church Street, London SE5 8TR licensed for:

- The provision of late night refreshment (indoors):
 - Sunday to Thursday 23:00 to 01:30 (the following day)
 - Friday and Saturday 23:00 to 02:30 (the following day)

Bolu Kebab Restaurant – 7 Camberwell Church Street, London SE5 8TR licensed for:

- The sale of alcohol to be consumed on the premises:
 - Monday to Thursday 09:00 to 03:00 (the following day)
 - Friday and Saturday 09:00 to 04:00 (the following day)
 - Sunday 12:00 to 03:00 (the following day)
- The provision of late night refreshment (indoors):
 - Monday to Sunday 23:00 to 05:00 (the following day)

Portuguese Café Deli – 11 Camberwell Church Street, London SE5 8TR licensed for:

- The sale of alcohol to be consumed on and off the premises:
 - Monday to Sunday 08:00 to 00:00 (midnight)
- The provision of late night refreshment (indoors)

- Monday to Saturday 23:00 to 00:00 (midnight)
- Sunday 23:00 to 23:30

Wuli Wuli – 15 Camberwell Church Street, London SE5 8TR:

- The sale of alcohol to be consumed on and off the premises:
 - Sunday to Thursday 12:00 to 23:00
 - Friday and Saturday 12:00 to 01:00 (the following day)
- The provision of late night refreshment (indoors)
 - Sunday to Thursday 23:00 to 23:30
 - Friday and Saturday 23:00 to 01:00 (the following day)

Cannon and Cannon Fine Foods – 17-21 Camberwell Church Street, Lonon SE5 8TR licensed for:

- The sale of alcohol to be consumed on and off the premises:
 - Monday to Sunday 11:00 to 23:00

Stormbird – 25 Camberwell Church Street, London SE5 8TR licensed for

- The sale of alcohol to be consumed on and off the premises:
 - Monday to Wednesday 10:00 to 00:00 (midnight)
 - Thursday 10:00 to 02:00
 - Friday and Saturday 10:00 to 03:00 (the following day)
 - Sunday 10:00 to 00:00 (midnight)
- The provision of late night refreshment (indoors):
 - Monday to Wednesday 23:00 to 00:00 (midnight)
 - Thursday 23:00 to 02:00
 - Friday and Saturday 23:00 to 03:00 (the following day)
 - Sunday 23:00 to 00:00 (midnight)
- The provision of regulated entertainment in the form of recorded music, live music, films, and performance of dance (indoors):
 - Monday to Wednesday 10:00 to 00:00 (midnight)
 - Thursday 10:00 to 02:00
 - Friday and Saturday 10:00 to 03:00 (the following day)
 - Sunday 10:00 to 00:00 (midnight).

Southwark council statement of licensing policy

35. Council assembly approved Southwark's statement of licensing policy 2016 to 20 on 25 November 2015. The policy came into effect on 1 January 2016. Sections of the statement that are considered to be of particular relevance to the sub-committee's consideration are:

- Section 3 - Purpose and scope of the policy. This reinforces the four licensing objectives and the fundamental principles upon which this authority relies in determining licence applications.
- Section 5 - Determining applications for premises licences and club premises certificates. This explains how the policy works and considers issues such as

location; high standards of management; and the principles behind condition setting.

- Section 6 - Local cumulative impact policies. This sets out this authority's approach to cumulative impact and defines the boundaries of the current special policy areas and the classifications of premises to which they apply. To be read in conjunction with Appendix B to the policy.
 - Section 7 - Hours of operation. This provides a guide to the hours of licensed operation that this authority might consider appropriate by type of premises and (planning) area classification.
 - Section 8 - The prevention of crime and disorder. This provides general guidance on the promotion of the first licensing objective.
 - Section 9 - Public safety. This provides general guidance on the promotion of the second licensing objective.
 - Section 10 - The prevention of nuisance. This provides general guidance on the promotion of the third licensing objective.
 - Section 11 - The protection of children from harm. This provides general guidance on the promotion of the fourth licensing objective.
36. The purpose of Southwark's statement of licensing policy is to make clear to applicants what considerations will be taken into account when determining applications and should act as a guide to the sub-committee when considering the applications. However, the sub-committee must always consider each application on its own merits and allow exceptions to the normal policy where these are justified by the circumstances of the application.
37. Within Southwark's statement of licensing Policy 2016 - 2020, the premises are identified as being within the Camberwell cumulative impact policy (CIP) area. Under the Southwark statement of licensing policy 2016 to 2020 the local CIP applies to night clubs, public houses and bars, off-licences, supermarkets and grocers. The closing time recommended in the statement of licensing policy for off licences, and grocers or supermarkets with off sales of alcohol in this area is 00:00 (midnight) daily.

Resource implications

38. There is no fee associated with this type of application.

Consultation

39. Consultation has been carried out on this application in accordance with the provisions of the Licensing Act 2003.

Community impact statement

40. Each application is required by law to be considered upon its own individual merits with all relevant matters taken into account.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

41. The sub-committee is asked to determine, under Section 51 of the Licensing Act 2003, following an application, made under Section 51 of the same act, for a review of premises licence. At any stage, following the grant of a premises licence, a responsible authority or any other person may ask the licensing authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.
42. The principles, which sub-committee members must apply, are set out below.

Principles for making the determination

43. Under section 52 the licensing authority must hold a hearing to determine the review and any relevant representations.
44. The four licensing objectives are:
 - The prevention of crime and disorder
 - The protection of public safety
 - The prevention of nuisance
 - The protection of children from harm.
45. Each objective must be considered to be of equal importance. The authority must, having regard to the application and any relevant representations, take such of the following steps as it considers appropriate for the promotion of the licensing objectives. The steps are to:
 - Modify the conditions of the licence by altering, omitting or adding any condition
 - Exclude a licensable activity from the scope of the licence
 - Remove the designated premises supervisor
 - Suspend the licence for a period not exceeding three months
 - Revoke the licence.
46. For the purpose of determining a relevant representation under section 52 of the Act a “relevant representation” means representations which:
 - Are relevant to one or more of the licensing objectives
 - Are made by the holder of the premises licence, a responsible authority or an other person within the prescribed period
 - Have not been withdrawn
 - If made by an other person (who is not also a responsible authority), that they are not, in the opinion of the relevant licensing authority frivolous or vexatious.
47. Modifications of conditions and exclusions of licensable activities may be imposed either permanently or for a temporary period of up to three months.

48. The authority may decide that no action is necessary if it finds that the review does not require it to take any steps appropriate to promote the licensing objectives.
49. In deciding what remedial action if any it should take, the authority must direct its mind to the causes or concerns that the representations identify. The remedial action should generally be directed at these causes and should always be no more than an appropriate and proportionate response.
50. It is of particular importance that any detrimental financial impact that may result from a licensing authority's decision is appropriate and proportionate to the promotion of the licensing objectives in the circumstances that gave rise to the application for review.

Reasons

51. Where the authority determines an application for review it must notify the determination and reasons why for making it to:
 - The holder of the licence
 - The applicant
 - Any person who made relevant representations
 - The chief officer of police for the area (or each police area) in which the premises are situated.

Hearing procedures

52. Subject to the licensing hearing regulations, the licensing committee may determine its own procedures. Key elements of the regulations are that:
 - The hearing shall take the form of a discussion led by the authority. Cross examination shall not be permitted unless the authority considers that it is required for it to consider the representations
 - Members of the authority are free to ask any question of any party or other person appearing at the hearing
 - The committee must allow the parties an equal maximum period of time in which to exercise their rights to:
 - Address the authority
 - If given permission by the committee, question any other party.
 - In response to a point which the authority has given notice it will require clarification, give further information in support of their application.
 - The committee shall disregard any information given by a party which is not relevant:
 - To the particular application before the committee, and
 - The licensing objectives.
 - The hearing shall be in public, although the committee may exclude the public from all or part of a hearing where it considers that the public interest in doing

so outweighs the public interest in the hearing, or that part of the hearing, taking place in private

- In considering any representations or notice made by a party the authority may take into account documentary or other information produced by a party in support of their application, representations or notice (as applicable) either before the hearing or, with the consent of all the other parties, at the hearing.
53. This matter relates to the review of the premises licence under section 51 of the Licensing Act 2003. Regulation 26(1) (a) requires the sub-committee to make its determination at the conclusion of the hearing.

Council's multiple roles and the role of the licensing sub-committee

54. Sub-committee members will note that, in relation to this application, the council has multiple roles. Council officers from various departments have been asked to consider the application from the perspective of the council as authority responsible respectively for environmental health, trading standards, health and safety and as the planning authority.
55. Members should note that the licensing sub-committee is meeting on this occasion solely to perform the role of licensing authority. The sub-committee sits in quasi-judicial capacity, and must act impartially. It must offer a fair and unbiased hearing of the application. In this case, members should disregard the council's broader policy objectives and role as statutory authority in other contexts. Members must direct themselves to making a determination solely based upon the licensing law, guidance and the council's statement of licensing policy.
56. As a quasi-judicial body the licensing sub-committee is required to consider the application on its merits. The sub-committee must take into account only relevant factors, and ignore irrelevant factors. The decision must be based on evidence, that is to say material, which tends logically to show the existence or non-existence of relevant facts, or the likelihood or unlikelihood of the occurrence of some future event, the occurrence of which would be relevant. The licensing sub-committee must give fair consideration to the contentions of all persons entitled to make representations to them.
57. The licensing sub-committee is entitled to consider events outside of the premises if they are relevant, i.e. are properly attributable to the premises being open. The proprietors do not have to be personally responsible for the incidents for the same to be relevant. However, if such events are not properly attributable to the premises being open, then the evidence is not relevant and should be excluded. Guidance is that the licensing authority will primarily focus on the direct impact of the activities taking place at the licensed premises on members of the public, living, working or engaged in normal activity in the area concerned.
58. Members will be aware of the council's code of conduct which requires them to declare personal and prejudicial interests. The code applies to members when considering licensing applications. In addition, as a quasi-judicial body, members are required to avoid both actual bias, and the appearance of bias.
59. The sub-committee can only consider matters within the application that have been raised through representations from other persons and responsible authorities.

60. Under the Human Rights Act 1998, the sub committee needs to consider the balance between the rights of the applicant and those making representations to the application when making their decision. The sub-committee has a duty under section 17 Crime and Disorder Act 1998 when making its decision to do all it can to prevent crime and disorder in the borough.
61. Other persons, responsible authorities and the applicant have the right to appeal the decision of the sub-committee to the magistrates' court within a period of 21 days beginning with the day on which the applicant was notified by the licensing authority of the decision to be appealed against.

Guidance

62. Members are required to have regard to the Home Office revised guidance in carrying out the functions of licensing authority. However, guidance does not cover every possible situation, so long as the guidance has been properly and carefully understood, members may depart from it if they have reason to do so. Full reasons must be given if this is the case.

Strategic Director of Finance and Governance

63. The head of community safety and enforcement has confirmed that the costs of this process are borne by the service.

BACKGROUND DOCUMENTS

Background papers	Held At	Contact
Licensing Act 2003 Home Office Revised Guidance to the Act Secondary Regulations Southwark Statement of Licensing Policy Case file	Southwark Licensing, C/o Community Safety & Enforcement, 160 Tooley Street, London, SE1 2QH	Kirty Read Phone number: 020 7525 5748

APPENDICES

No.	Title
Appendix A	Copy of the review application
Appendix B	Copies of the representations submitted by a responsible authorities
Appendix C	Copy of the premises licence
Appendix D	Warning Letter to premises dated 4 th November 2015
Appendix E	Map

AUDIT TRAIL

Lead Officer	Deborah Collins, Strategic Director of Environment & Social Regeneration	
Report Author	Andrew Heron, Principal Licensing Officer	
Version	Final	
Dated	6 June 2017	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Law and Democracy	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Cabinet Member	No	No
Date final report sent to Constitutional Team		6 June 2017