



Epping Forest District Council



SCRUTINY

REPORT OF THE LICENSING SERVICES TASK AND FINISH PANEL

MARCH 2013

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1. Chairman's Foreword



The Licensing Function at Epping Forest District Council, as the Licensing Authority, plays an important part in the general well being of the residents and businesses in the District, by making sure Licensable activities are properly registered, assessed and where granted, operate within the terms of the Licence.

The Licensing Committee have Statutory Powers across twenty two Acts pertaining to Licensing ranging from Animal Boarding Establishments Acts 1963 to Zoo Licensing Act 1981

The business of the Task and Finish Panel, has been to look at our local arrangements under the Licensing Act 2003, Gambling Act 2005 and Local Government (Miscellaneous Provisions) Act 1982 in relation to premises licences and whether or not a more flexible approach could be undertaken to accommodate members and members of the public who experience difficulties in attending day time meetings and to look at ways to inform the occupiers of neighbouring properties of applications that are under consideration.

We have looked at the original Task and Finish request in great detail over, initially three meetings and the Licensing Officers have supplied very detailed analyses and general information to the many questions that have been asked of the Panel.

It is possible, there may be a requirement for this Panel to remain operative during the forthcoming municipal year to deal with genuine side issues that have arisen because of the very nature of the changes that the original request was seeking.

Our Task and Finish Panel has been greatly assisted by the Licensing Officers, Legal Officers and Democratic Services Officers whom we thank very much for the work they have done to inform the Panel.

Councillor Penny Smith
Chairman - Review of Licensing Services Task and Finish Panel

2. Introduction

Summary of issues scrutinised

The Licensing Services Task and Finish Panel was established by the Council's Overview and Scrutiny Committee in September 2012.

Our primary objective was to undertake a review of the proposal that licensing applications were considered in a similar way to planning applications –

- (i) Move the meetings to the evening so that Councillors with full time jobs could join the committee;
- (ii) Create south, east and west licensing sub-committees, so local councillors with local knowledge could decide the cases; and
- (iii) In cases where nightclubs, pubs or shops applied for changes to the hours in which they were licensed to sell alcohol, the relevant parish/town, district and county councillors and the nearest 50 residential properties to the application premises should be informed by letter to make them aware that an application had been submitted.

The Public Interest Justification presented as part of the original proposal forms are attached as Appendix 1.

Terms of Reference

At our initial meeting, the panel developed and agreed the following Terms of Reference. These were kept under review throughout the period of our work, to ensure their continued relevance.

1. To review the operation and effectiveness of the Licensing Sub-Committees structure.
2. To have regard of the Licensing Act 2003 on consultations.
3. To review the feasibility of moving some meetings to the evening.
4. To review the feasibility of creating a new Licensing Sub-Committee structure to enable local councillors and interested persons to have more input.
5. To review the most appropriate methods of informing people of their rights to make representations in respect of Licensing Applications and review hearings.

Methodology

The Panel agreed the matters which should be taken into consideration and instructed officers to provide statistical and other information.

This information was considered at our meetings and further reports required.

3. Context

The Authority has a statutory duty to issue and enforce conditions in respect a number of different licences. The types of applications that our Panel are considering are those which relate to premises licences. The reason is that the uses proposed in the applications may adversely affect the enjoyment of neighbouring properties.

Examples of the types of licence are:

- Licence for the retail sale of alcohol which includes alcohol consumed on and off the premises,
- Licence for late night music,
- Licence for sale of hot food after 11pm,
- Licence for street trading
- Gambling Act licences.

The Licensing Act 2003 specifies the composition of a Licensing Committee. Although it is not necessary to follow these requirements for licences issued under other legislation, such as gambling and street trading, this Authority does so and has only one licensing committee for all licensing. Regulations have been made under the different Acts specifying time limits for consultations and setting dates for the application hearings etc.

The statutory requirements and the Authority's own policies require that notices giving details of the applications are displayed on or near premises and advertised in a newspaper circulating in the area. The Panel has concerns that occupiers of neighbouring properties are not always aware of consultations.

We acknowledged that these proposals would lead to additional work for the sub-committees because of evening meetings and additional representations. The Panel considered that the residents' concerns mainly related to Premises Licences however not all concerns will be relevant when making a decision in respect of an application. The various licensing regimes set out the what issues the sub-committee can take account of for example the Licensing Act 2003 specifies that members may only take account of the four licensing objectives mentioned in the Act and there are only three objectives specified in the Gambling Act. Representations on other grounds such as planning cannot be taken into account.

We considered that the majority of Taxi licensing applications should continue to be heard at a daytime meeting.

4. Summary of Recommendations

The Task and Finish Panel recommended:

Composition of Licensing Committees and sub-committees

- 1) That a Licensing Committee of 15 members continues as it is currently set up at present.
- 2) That one calendared meeting be included in a time table to be held during the day per month to consider applications relating to taxi licences.
- 3) That one calendared meeting be included in a time table to be held per month, with a 6.30pm start (with a 3pm early start for exceptional meetings) to consider all other applications regarding licences;
- 4) If there were more than one application relating to a premises licence a month additional meetings be organised for each application;
- 5) That these new procedures be reviewed after 12 months of operation;
- 6) That the Constitution and Member Services Standing Panel be asked to carry out the review;

Notification of Premises Applications

- 7) That notification of an application should be sent to the occupiers of neighbouring properties within a radius of 150 metres of the application premises;
- 8) The envelopes should state that "Important – Notice of Licensing Consultation"
- 9) That the draft sample letter informing the occupiers of the application which was considered by the Panel and as annexed be used when notifying residents provided that it is updated when required (similar letters will be prepared for other types of licences); and
- 10) An interim 6 month report be submitted to the full Licensing Sub Committee.

Financial Implications

- 11) That Cabinet agree a bid for a supplementary estimate in the sum of £58,770.72 annually together with a single payment of £5,000 as detailed in the Resource Requirements on page 13.

5. Report

COMPOSITION OF LICENSING COMMITTEES

The Licensing Committee currently comprises fifteen members who are not selected on the basis of the location of their wards. Where the Authority receives objections to applications or the applicant does not meet set criteria the sub-committee hears the case and makes a decision.

The hearings take place during the day. The sub-committee may hear more than one premises licence application in a day together with applications relating to taxi vehicle and driver's licence.

The hearings are attended by the applicants, their legal and other advisors, members of the public, authorised persons which includes the Council's own environmental officers and responsible authorities such as police, trading standards officers from County and Epping Forest's planning officers.

A Request by Members for Scrutiny Review was made on the grounds for consideration that this be altered so that:

- applications should be heard by members who represent wards in the area where the Premises are located, and
- meetings should take place in the evenings so that members with day time jobs could take part in the sub-committee hearings

We instructed officers to provide a statistical review of the Licensing Sub-Committee meetings over the last two years to ascertain:

- how many applications there had been,
- how many applications received representations and were decided by the sub-committee,
- the length of the meetings,
- the types of applications considered,
- whether the applicants had been legally represented, and
- the indicative costs of hiring outside premises.

Officers also consulted with other officers from Councils who held evening meetings.

At our meetings we noted that last year that approximately two thirds of the hearings which took place related to premises in the south of the district. We considered that only one application should be heard in one evening.



The frequency of hearings could not be ascertained in advance as there was sometimes an application for more than one premises in an area in a month and in other months there may not be any. If a local hall for the south was booked for the year then it would not always be used. There may be difficulties in booking suitable additional accommodation if more than one hearing was to take place in a month. In the north, it would not be economic to book a year ahead and it may be difficult to book suitable accommodation at short notice.

The officer's consultations had also highlighted concerns about health and safety. We therefore decided that meetings should take place in the Council's Civic offices

Consideration was given to splitting the Licensing Committee into north/south areas but this was rejected at present but the Appointments Panel be asked to consider geographic representation of the Licensing Committee.

This Panel decided that:

- 1) That a Licensing Committee of 15 members continues as it is currently set up at present.**
- 2) That one calendared meeting is included in a time table to be held during the day per month to consider applications relating to taxi licences.**

The Panel acknowledged that the Premises Licences hearings and the additional notifications of the consultations may lead to pressure being put on members if all applications were heard in the evening. Members considered delegating these decisions to the Director of Corporate Support Services and the Assistant Director (Legal) but decided that members should continue to make the decisions. Daytime meetings allow for a number of applications to be heard in one meeting.

- 3) That one calendared meeting be included in a time table to be held per month, with a 6.30pm start (with a 3pm early start for exceptional meetings) to consider all other applications regarding licences;**

The Panel agreed that the Committee Service should book the Council chamber for one meeting a month. It was noted that in a two year period there were ten months with two hearings and one month when there would be three hearings. The rooms in the Civic Offices for those additional hearing would be booked within statutory time limits.

We are proposing that the occupiers of every property within 150 metres of the application premises receive notification of the application. The panel considers that this will lead to an increase the involvement of the local residents in the licensing decisions and we understand from the experience of Westminster Council that representations are received on all applications and it receives a large number of representations in some of the cases. If our proposals meet with a similar response we would expect that there will be two meetings a month and increase in the time members of the sub-committees and legal officers will have to prepare for the meetings.

Most licensing hearings will be booked to start at 6.30pm. We heard evidence that in some cases, especially reviews, these have taken a full day. In cases where it is likely that the hearing and decision in a case will exceed three and a half hours then the case will start earlier in the day. It was noted that if it is expected that the time for the hearing is likely to continue to the next day it is a statutory requirement that the hearing takes place on consecutive days.

In addition to the extra licensing meetings, Democratic Services have been asked to cover:

- (a) a new Cabinet House Building Committee, and

(b) a Portfolio Holder Advisory Group on the Waste contract.

There has been additional pressure from the Constitution Panel and it is likely that the OS Review Panel will not complete its review in the one remaining programmed meeting.

To cover the evening meetings in addition to the requirement of day time meetings a new post would be required (c. £21,000 including on costs full time) to provide support.

4) If there were more than one application relating to a premises licence a month additional meetings be organised for each application;

We noted that officers may be required to give evidence in two hearings for applications within one month. This would cause problems if the hearings took place on the same night.

It was reported to us that the committee rooms are also more likely to be booked in an evening. The Council chamber is more easily booked for the additional meetings.

5) That these new procedures be reviewed after 12 months of operation;

6) That the Constitution and Member Services Standing Panel be asked to carry out the review;

We recognise the need to review the procedures. One concern was that elderly people may not wish to travel in an evening. However, it was considered that this should be balanced against allowing people who are in work to attend.

NOTIFICATION OF PREMISES APPLICATIONS



There are varying requirements in the legislation for consulting with members of the public. We noted that the procedure usually followed is that a public notice is published in a local newspaper and a notice of a type prescribed by statute is displayed on or near the premises.

Members had concerns that the occupiers of neighbouring properties do not always see these notices and considered that applications should be specifically brought to their attention.

The panel considered whether the notices should be sent addressed individually to named residents as it would be possible to identify occupiers from various data bases held by the Council. However, we received advice that if has obtained information for one purpose the Council cannot legally use it for another purpose e.g. Council tax information cannot be used for licensing purposes. It was agreed that any notifications sent should be addressed to 'The Occupier'.

We were informed that the Senior Licensing Enforcement Officer had consulted with Westminster Council who similarly notifies occupiers of neighbouring properties and we understand that this is a very effective way of communicating knowledge of the application and, in Westminster; representations are received in respect of every application. There is also a high level of representations received.

We decided that:

- 1) That notification of an application should be sent to the occupiers of neighbouring properties within a radius of 150 metres of the application premises;
- 2) The envelopes should state that “Important – Notice of Licensing Consultation”
- 3) That the draft sample letter informing the occupiers of the application which was considered by the Panel which is annexed be used when notifying residents provided that it is updated when required (similar letters will be prepared for other types of licences); and
- 4) An interim 6 month report be submitted to the full Licensing Committee.

FINANCIAL IMPLICATIONS

- 1) That Cabinet agree a bid for a supplementary estimate in the sum of £58,770.72 annually together with a single payment of £5,000 as detailed in the Resource Requirements on page 12.

Attendance at Sub-committee meetings

There are usually four officers who attend these meetings - the Committee Officer, Legal Advisor, the Licensing Enforcement Officer, and, the Senior Licensing Enforcement Officer. If the evening meetings finishes before 10pm the cost for officer's time will be £234.52 for an evening.

Last year there were 41 applications for premises licences but only 28 were referred to the sub-committee. It is likely that the specific notifications to neighbouring occupiers will lead to an increase in the number of hearings as well as the volume of representations received. If every application receives representations in the same way as Westminster, then there would have been 41 hearings the cost of officer's time in attendance would be £9,615.32.

The taxi licensing would continue during the day time and so these meetings would be additional to those currently attended by committee officers. The additional input from Democratic Services is recognised and a new post be created c. £21,000.

Notification of Consultations

There were 41 premises applications last year which would require notification in this way. It is intended that the Council's GIS officer would identify the properties within 150 metres of the premises concerned. He will prepare a spreadsheet that will be suitable for using with mail merge. His charges are £38.61 per hour. On average it will take about 30 minutes for an application.

The licensing officers will send the spreadsheet, a standard notification letter and a copy of the notice to Reprographics. Their charges below are based on 180 properties which would be the average in an urban area. Most applications are in an urban area.

Reprographics would print out the letters and be able to put them automatically in an envelope with the copy notice. Their costs would amount to:

Recharges from Reprographics	£1,435.00	
Envelopes with alert.	£ 217.30	
Postage	<u>£3,394.80</u>	
Total		£5,047.10

The Licensing officers will have to check the notices and input information onto their licensing software M3 to record that this has been done.

There is expected to be an increase in the numbers of telephone calls, correspondence and the need for mediation. This is work is time consuming but is an important part of the Licensing Enforcement Officer's work. Last year 28 cases went to the sub-committee out of a possible 41. Consultation suggests that representations and/or enquiries will be received in respect of all properties if notifications are sent out.

The increased workload will have to be carried out by one of the Licensing Enforcement Officers as they will have the knowledge to advise members of the public regarding the relevance of their objections and procedure at the meetings. They will also act as mediators in these types of cases. If there are 30 replies the following is the likely time taken.

- Preparing the draft letter, sending to Reprographics, checking and sending out the notification = 82 hours
- Acknowledgment sent to all respondents and saving original communication and acknowledgement on M3 (assumed 30 letters x 15 min x 41) = 307.5 hours
- Email replies to respondents – assumed required clarifications etc on 5 – 1 hour each =205 hours
- Telephone enquiries - 205 hours
- Sending out invite to sub-committee- to all making representations and responsible authorities = 307.5 hours
- The reports to sub-committee will have to make reference to all letters received and comment on whether the representations are legally correct - additional 1 ½ hours = 63 hours
- Redacting of documents – (30 letters x 15mins x 41) = 307.5 hours
- Entering all documents on M3 - saving and entering documents onto M3 = 41 hours

The total would be for routine applications 1518.5 hours. This would require another full time member of staff. However, this is an estimate of time. There are clearly likely to be cases where there will be many more representations and others where there will be very few or none. Until the notification process is introduced it will not be possible to estimate this and a temporary member of staff should be employed for one year and the workload reviewed after that time. The cost of this member of staff will be £22,317 pa.

Additional Costs

It will be necessary to add further accommodation to Licensing. It has not been possible to obtain specific costing but it is likely to be in the range of £5,000.

Draft Letter

A draft letter in respect of the Licensing Act Applications is attached as Appendix 2. If this is approved in this format a similar letter will be prepared for Gambling, Street Trading and Sex Establishments.



RESOURCE RECOMMENDATIONS.

We recommend that the following resources are made available each year to ensure that these initiatives can be introduced. The amount of additional work is unknown at present and these figures will be kept under review

Annual Costs:

Committee and Sub-committees

Officer's Time for evening attendance - £9,615.32

Notification of Application

GIS	791.30	
Reprographics	5,047.10	
Licensing Officer	<u>22,317.00</u>	
		28,155.40

Committee

Committee Officer	<u>21,000.00</u>
	£58,770.72

Additional costs

Accommodation Costs (First Year) - £5,000.

The Licensing Service must process many of the licences within statutory time limits or the licence is deemed to have been granted. There have been new statutory obligations under scrap metal licensing which have led to an increase in work as well as the introduction of changes in the charging regime for licensing fees and if taxi metering is introduced. The additional work will adversely affect other licensing work unless additional staffing resources are agreed to.

6. Conclusions

The Task and Finish Panel was set up to investigate whether there were ways in which Licensing Applications in respect of premises licences could be decided more locally and give the occupiers of neighbouring properties greater opportunities to participate in the hearings. Members who have work commitments during the daytime also wished to be involved in Licensing decisions.

We decided that the most appropriate way to do this was to hold evening meetings for applications which related to premises licences. This would allow members and those who wished to make personal representations at the hearings but who work during the day an opportunity to attend. To ensure that the occupiers of neighbouring properties were aware of the applications we further agreed to recommend that specific notifications be sent to occupiers of properties within 150 metres of the property.

The Panel considered that the applications relating to taxis should continue to be heard during the day.

We acknowledged that this would increase the number of hearings and that the implementing of these proposals will lead to additional costs. It is difficult to estimate at this stage the increase of work and this will be kept under review. It is recommended that the additional resources be approved so that the Panel's decisions can be implemented.

7. Members of the Panel

Councillors Mrs (P) Smith (Chairman), K Angold-Stephens, J Hart, R Morgan, J Philip. Mrs C Pond, D Stallan and Mrs S Watson

8. Acknowledgements

Consultations

- Members of the Public Law Partnership's Licensing Special Interest Group
- Members of the Solicitors in Local Government Group ;
- Local Government Association
- Licensing Manager fro Westminster City Council

Officers;

Rob Irwin – GIS Officer, Rob Purse – Systems Manager

Ann Hickman – Reprographics Assistant

Adrian Hendry Democratic Services Officer, Graham Lunnun – Assistant Director,

Ian Willett – Assistant to the Chief Executive

Kim Tuckey – Senior Licensing Enforcement Officer

Rosaline Ferreira – Assistant Solicitor

Alison Mitchell – Assistant Director (Legal)

Experts;

Websites; Local Government Association

Laws;

Licensing Act 2003 as amended, The Licensing Act 2003 (Hearings) Regulations 2005

The Licensing Act 2003 (Summary Review of Premises Licences) Regulations 2007

Gambling Act 2005

The Gambling Act 2005 (Proceedings of Licensing Committees and Sub-committees)(Premises Licences and Provisional Statement)(England and Wales) Regulations 2007.

Local Government (Miscellaneous Provisions) Act 1982

Local Government and Housing Act 1989

Town and Police Clauses Act 1847 and 1889

Local Government (Miscellaneous Provisions) Act 1976

Human Rights Act – Article 6 - right to a fair hearing

Background papers:

Agenda and Minutes of the Task and Finish Panel

Environmental/Human Rights Act/Crime and Disorder Act Implications:

Council policies etc.

Current list of delegations and the Council's Constitutio

APPENDIX 1

**Request by Member for Scrutiny Review
2012/13 Work Programme**



Please complete the form below to request consideration of your issue by the Overview and Scrutiny Committee

Proposers Name: James Hart	Date of Request 17.8.12
Supporting Councillors (if any): Sylvia Watson	
Summary of Issue you wish to be scrutinised: I would like to propose that the ONS committee set up a task and finish panel to look into restructuring the running of the council's licensing committee on a trial basis for the 2013/14 council year. Specifically, the proposal is to consider licensing applications in a very similar way to the way in which planning applications are decided by the council:- <ol style="list-style-type: none"> 1) Move the meetings to the evening so that councillors with full time jobs can join the committee. 2) Create south, east and west licensing sub-committees so that local councillors with essential local knowledge can decide the cases. 3) In cases involving nightclubs, pubs or shops applying for changes to the hours in which they are licensed to sell alcohol, the relevant town, district and county councillors, and the nearest 50 residential properties to the application premises, should be informed by letter to make them aware that an application has been submitted. 	
NOTE: ENTRIES BELOW RELATE TO ISSUE CATEGORIES OF THE PICK PROCESS. PLEASE REFER TO THE EXPLANATORY NOTES TO THIS FORM FOR FURTHER INFORMATION	
Public Interest Justification: The current system is far from satisfactory given the size and diversity of the district. Under the current system it is not unusual for councillors drawn from the rural north of the district to be called upon to decide upon licencing applications that have a very big impact upon the lives of residents living in towns such as Loughton or Buckhurst Hill. The councillors deciding these cases may never even have visited Loughton or Buckhurst Hill late on a Friday or Saturday night and therefore lack the essential local knowledge to decide these cases. Many of the council's 58 councillors have full-time jobs and their working commitments prevent them from joining committees, like the licensing committee, that meet during working hours. The licensing of nightclubs and pubs, and the knock-on effect on our high streets on Friday and Saturday nights, is too big an issue to effectively dis-enfranchise working age councillors from attending these meetings and representing their ward members when these cases are decided by the council. The vast majority of local residents don't even know that a local nightclub or pub has submitted an application for extensions to their licensing hours until they read about the decision of the licensing committee in the local press. Many residents feel	

APPENDIX 2 – Draft Consultation letter for premises licensed under the Licensing Act 2003

Our Ref:

Name

Date:
If Telephoning please ask for:
(01992)

Dear Occupier,

NOTIFICATION OF CONSULTATION – AN APPLICATION IN RESPECT OF PREMISES LICENCES WHICH MAY AFFECT YOU

GUIDE TO MAKING REPRESENTATIONS UNDER THE LICENSING ACT 2003

Epping Forest District Council is undertaking a public consultation details of which are set out in the notice enclosed. The consultation involves advertising in the local newspaper, site notices and advertisement on the Council's website. We encourage members of the public and local businesses to be involved in the licensing process and so we are notifying occupiers of nearby properties of this consultation.

This letter explains how you can make representations either for or against the application and how you can take part in any meeting where you have submitted a written representation.

WHAT CAN I SAY?

The Act limits the grounds upon which you may make a representation in respect of an application. These are:

- The prevention of crime and disorder;
- Public Safety;
- The prevention of public nuisance; and
- The protection of children from harm

You should state which of the above grounds you are making a representation on, the reasons for each representation and send any evidence you may have. **Please do not include representations on any other issues such as planning, as the Authority is prohibited by statute from taking these into account.**

It is important that your written representation makes the points which you wish to raise as the Council cannot hear new issues at the hearing.

Please note that if you submit a representation the Authority will inform the Applicant of your name and address. If you have concerns about this you must let the Senior Licensing Officer know your reasons for not disclosing your details or withdraw any representation.

DEADLINE FOR MAKING A REPRESENTATION

The closing date for submitting a representation is shown on the attached notice.

ATTENDING THE MEETING OF THE SUB-COMMITTEE

If you make a representation you will be informed of the date of the hearing. A copy of the agenda of the Licensing Sub-Committee will be placed on the Council's website.

If you have submitted a written representation you will be allowed to have your say about the representation. However, if you have not made any representation in writing or it has been received after the closing date mentioned on the attached notice the Authority cannot hear your representation.

If the representations are valid, i.e. relate to one of the four licensing objectives you may explain the issues to the sub-committee but not introduce new representations.

It is a good idea to arrive a few minutes earlier to collect papers and speak to the Licensing Officers who can answer any questions you may have.

If there are a number of people raising the same issues you are encouraged to appoint a spokesman. The members of the sub-committee will have read all the representations prior to the meeting and it is only necessary to clarify issues or reply to issues raised during the hearing.

SUB-COMMITTEE

The sub-committee consists of three District Councillors.

WHAT HAPPENS AT THE SUB-COMMITTEE

- Firstly, the Chairman of the sub-committee will introduce the application and explain the procedure
- Then the applicant or their representative will present their application. The sub-committee members will then ask questions and those who have made written representations will be invited to ask questions.
- Those who have submitted written representations will then have an opportunity to put their case. The members of the sub-committee and the applicant or their representative can then ask questions. Those who made written representations will then be asked to sum up to clarify any issues that have been raised.
- The applicant will then be asked to sum up again clarifying any points raised.
- Following the speeches, the items will be discussed by the Councillors who are the members of the sub-committee.

SUGGESTIONS ON HOW TO SPEAK

- If you have the right to speak please keep your comments to the points raised in your written representations.
- If you are one of a number of people who made similar representations you should consider appointing a representative to speak on behalf of the group.
- You can ask a person to represent you at a sub-committee but if you do not attend you must write a letter authorising them to speak on your behalf unless they are an Epping Forest District Councillor.
- However strongly you may feel about an issue, keep in mind the need to be polite and to respect the views of others. Avoid personal insults.

HOW MATTERS ARE DECIDED

All items are decided by a simple majority by the members of the sub-committee after the end of the discussion on each item. The decision is usually announced at that time.

The address to send any representation or to make enquiries is:

The Licensing Team,
Epping Forest District Council,
Civic Offices,
High Street,
Epping,
Essex CM16 4BZ

Or email

Yours faithfully,

K Tuckey,

Senior Licensing Officer

