



Promoting Clean and Safe Public Space in Lambeth through the Improvement of Licensing and Enforcement Systems

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Abstract

The London borough of Lambeth struggles to maintain clean and safe public spaces due to their inefficient licensing and enforcement systems. The purpose of this project was to review these systems and recommend improvements to increase public compliance and administrative efficiency. We interviewed local businesses, other borough councils, and Lambeth Council employees to identify problems and potential solutions. We created a wide variety of solutions ranging from a license fee calculator to recommending the placement of ashtrays outside of Underground stations. The Council's outdated software was the most problematic issue we discovered. We recommended 16 software features that satisfied our project's purpose and identified preexisting software that implements most of these features.

Executive Summary

Ensuring clean and safe public spaces is one of the London borough of Lambeth's highest priorities, but acts such as littering and the placement of unauthorized street clutter, such as tables and chairs (TAC), interfere with this objective. Littering alone costs Lambeth Council approximately £7.3 million a year to clean up, and unregulated street clutter makes it difficult for the public, especially people with disabilities and people with strollers for their children, to safely access public spaces (Ogundu, 2015). Lambeth Council attempts to mitigate litter and street clutter by issuing licenses to regulate excessive street clutter as well as fines to enforce legislation and license regulations. The Council has tasked the team with ensuring that their licensing and enforcement systems are effective in increasing public compliance and creating clean and safe public spaces.

The overarching goal of this project was to increase public compliance with regards to littering and street clutter and to utilize borough resources more efficiently by recommending improvements to the Council's current licensing and enforcement systems. In order to do so, the group identified tools and techniques to make the ticket issuing and license application processes more accommodating, to streamline ticketing and licensing follow up procedures, and to utilize available enforcement tools to their fullest extent. The team completed five objectives in order to achieve this goal:

1. Identify and characterize current licensing and enforcement tools and techniques employed by Lambeth.
2. Determine the perspectives of Lambeth community stakeholders regarding the ticket issuing and license application processes.
3. Determine the perspectives of Lambeth Council employees regarding the complete ticketing and licensing procedures.
4. Investigate efficient licensing and enforcement tools and techniques used by other London boroughs.
5. Recommend both small-scale and large-scale system improvements to increase public compliance and utilize borough resources.

Lambeth Council issues licenses for skips and TAC in order to regulate street clutter. Skips and TAC can become street clutter if unregulated because they make public spaces unsafe and limit public access. The Council is also concerned with the enforcement of Section 87 legislation, which details environmental offenses such as littering and dog fouling. Lambeth Council employs their own community safety officers (CSOs) as well as enforcement officials from a third-party contractor known as NSL. These officials enforce legislation, such as Section 87, and license regulations for skips and TAC by issuing on site tickets known as fixed penalty notices (FPNs). In order to create and record all license and enforcement data, Lambeth Council uses two software databases that do not interact with each other.

In order to achieve both our project goal and objectives, the team broke the problem of licensing and enforcement up into four distinct topic areas skips, tables and chairs, and software systems. When investigating these areas, the team applied its objectives by conducting interviews with employees of Lambeth Council, employees of other borough councils such as Tower Hamlets and Hackney, and local businesses that applied for TAC licenses. The team also conducted site visits and consultations with CSOs, and surveyed skip companies that operate throughout the borough. The team followed these methods for each of our four topic areas to identify problems that existed within the borough and to generate recommendations to improve the quality of public space within the borough.

The main problem regarding the skip license application process was the ability for applicants to apply through the Gov.uk website. Skip companies use the Gov.uk website to bypass Council policies and skip application fees from Gov.uk applications do not go to the council. Overall the team estimates that the council is losing 32,000 pounds of revenue from application made through Gov.uk. The team recommends that the Council redirects users away from the Gov.uk application site directly to the Lambeth Council skip application, as it would allow the Council to better allocate resources as well as make the application process more accessible for the customers.

There are also a number of improvements that can be made to the Lambeth Council skip application. The application is very difficult to find and does not highlight critical information such as license regulations and TfL controlled roads. Furthermore, the application requires companies to write their payment information down which is a breach of personal security. The team recommended that Lambeth Council uses a new payment method where they do not prompt

customers for payment information until the Council decides to approve their license and that the Council highlights critical information on the application itself.

The main problem with the TAC license application is the application fee calculation. The license fee is difficult to calculate and therefore, roughly 50% of applicants miscalculate this cost, frustrating businesses and wasting the time of the council. The difficulty of the calculation stems from the multitude of different variables which include, number of chairs, hours placed outside, and street address. The team has created an excel sheet that automates the processes of calculating the TAC license fee, which a council employee could use to verify application payments instead of calculating it themselves. Additionally, the team recommended reducing the number of factors involved in the license fee calculation.

The Council issues 40% of all FPNs issued at three Underground stations: Waterloo, Vauxhall, and Brixton. This distribution is because NSL focuses enforcement on the areas. People frequently smoke outside of Underground stations before entering, and litter their cigarettes outside of the station. The vast majority of these FPNs outside of Underground stations were Section 87 FPNs for littered cigarette butts. Though NSL's distribution of enforcement officials may generate a high number of FPNs, it may not be most effectively improving the quality of public space. Enforcing Section 87 in key public spaces, such as parks and plazas, may have a more significant impact on public opinion.

Furthermore, the Council should work with TfL to ensure that there are clearly visible ashtrays outside of those three underground stations. Providing the public with an easy and legal way to dispose of cigarettes may help to significantly reduce Section 87 offenses in those areas, allowing enforcement officials to spend time in other public spaces.

After analyzing Lambeth Council's current licensing and enforcement systems, the team identified 16 specific software features that would significantly improve administration processes and the customer experiences. The team created a recommended software system based upon those 16 features and five major aspects: data visualization, remote access, online applications, online FPN payment, and data access control.

License and enforcement data should be easy to visualize so that employees can make more informed decisions. Currently CSOs must spend significant time leaving and returning to the office to inspect licenses and issue FPNs, so employees should be able to access council data remotely. Licensing administration time could be significantly reduced by implementing smart

online applications. The Council uses an online FPN payment system, but when an offender pays for their FPN an employee must manually update the back office system. Manual entry costs council employees time and can cause significant administrative errors, such as demanding payment from an offender who has already paid their FPN. Finally, the software system must control employee's access to back office data in order to protect council data.

Software systems such as the one the team proposed are available and being implemented by other boroughs. A software company called Farthest Gate offers the borough of Hackney the Liberator software suite, which significantly reduced the administration of the borough's licensing and enforcement processes. The team recommends that the council consider the implementation of a software system like the one described above.

Authorship Page

Section Number	Section	Main Author	Main Editor
	Abstract	John, Evan	Kyle, Andrew, Evan, John
	Executive Summary	Andrew, Evan, John, Kyle	Kyle, John, Evan, Andrew
	Acknowledgements	Evan	John
1	Introduction	Kyle, Andrew, Evan, John	Kyle, Andrew, Evan, John
2	Background	Kyle, Andrew, Evan, John	Kyle, Andrew, Evan, John
2.1	Anti-social Behavior	Andrew	Evan, Kyle
2.1.1	Prosecuting Anti-social Behavior	Andrew	John
2.1.2	Criticisms of Anti-Social Behavior	Andrew	John
2.2	Public Space in Lambeth	Andrew	John
2.3	Littering	Evan	Kyle

2.4	Street Clutter	Andrew	Evan
2.4.1	Skips	Kyle	John
2.5	Transport for London	Andrew	John
2.6	Lambeth Tools	John	Kyle
2.6.1	Section 87	John	Kyle
2.6.2	Software Systems	John	John
2.6.3	Fixed Penalty Notices	Andrew	Andrew
2.6.3.1	Administration-Free FPN Model	Andrew	John
2.6.4	Community Safety Officers	Kyle	John
2.6.5	NSL	Evan	John
2.7	Tools in Other Boroughs	John	Kyle
2.7.1	Tower Hamlets	Evan	John, Kyle
2.7.2	Farthest Gate	John	Evan, Andrew
2.7.3	Kingdom Services Group	John	Evan
2.8	Licensing Policies within Lambeth	Kyle, Andrew, Evan, John	John

2.8.1	Skips License Application	Andrew	Kyle, Evan
2.8.1.1	Via Gov.uk	Andrew	Kyle, Evan
2.8.1.2	Via email	Andrew	Kyle, Evan
2.8.1.3	Applications to TfL	Andrew	John
2.8.2	Tables and Chairs Application	Evan	Kyle, Andrew
2.8.2.1	Banding	Evan	Kyle, Andrew
2.8.2.2	Application Process	Evan	Kyle, Andrew
2.8.2.3	Data Entry in Uniform	Evan	Kyle, Andrew, John
2.8.2.4	Consultation Process	Evan	Kyle, Andrew
2.9	Enforcement of Policies	Kyle	John
2.9.1	Tables and Chairs Enforcement	Kyle	Andrew, John
2.9.2	Skip Enforcement	John	Andrew, Evan, Kyle
3	Methods	John	Evan

3.1	Objective 1	Evan	John
3.2	Objective 2	Andrew	John
3.2.1	Skip Company Survey	Andrew	John
3.2.2	TAC Business Interviews	Andrew	John
3.3	Objective 3	Andrew	Kyle
3.3.1	Interviews with Lambeth Council Employees	Andrew	Kyle
3.3.2	Observations and Interviews of Enforcement Officials	Andrew	Kyle
3.4	Objective 4	Kyle	Andrew
3.5	Objective 5	John	Evan
4	Problems and Recommendations	John	Kyle
4.1	Short Term Recommendations	John	Kyle
4.1.1	Improve Skip Application Submission Process	John	Kyle
4.1.2	Highlight Lights and Marks License Regulations	Evan	Andrew
4.1.3	Inform Applicants of Road Restrictions	Evan	Andrew
4.1.4	Create Formal Skip Inspection Policy	Kyle	Andrew

4.1.5	Create Policy Regarding an Obstructed Skip Spot	John	Kyle
4.1.6	Automatically Calculate TAC License Application Fees	John	Evan
4.1.7	Reformat Online TAC Application Data	Andrew and John	Evan
4.1.8	Eliminate the Banding System	John	Kyle
4.1.9	Re-consult TAC Licenses	John	Andrew, Kyle
4.1.10	Standardize TAC Consultation Process	John	Kyle
4.1.11	Implement Quarterly TAC Licenses	Andrew	Evan
4.1.12	Automatically Email FPN Payment Information	Evan	Kyle, Andrew
4.1.13	Redistribute Enforcement Officials Throughout Lambeth	John	Evan, Andrew
4.1.14	Notify NSL Regarding Paid FPNs Immediately	John	Kyle, Evan
4.1.15	Change CSO FPN Quotas from Monthly to Biweekly	Evan	Kyle
4.2	Long Term Recommendations	John	Andrew
4.2.1	Use Software to Reduce FPN Administration Times	Andrew	Evan
4.2.2	Place Ashtrays Outside of Tube Stations	Andrew	Kyle
4.2.3	Utilize Uniform Data More Efficiently	John	Kyle
4.2.4	Use Software to Recognize Repeat Offenders	Kyle	Andrew

4.2.5	Allow Enforcement Officials to Access License Data Remotely	Andrew	John, Evan
4.2.6	Maintain Existing Software	Andrew	Kyle, Evan
4.2.7	Use Software to Streamline Application Approval and Entry Process	Andrew	John, Kyle
4.2.8	Compartmentalize Software System Information	Andrew	Kyle, Evan
4.3	Implement a New Software System	Andrew	John, Kyle
4.4	Cost Benefit Analysis	Andrew	Evan
5	Conclusion	John	Kyle
6	Works Cited	Andrew, Evan, John, Kyle	Andrew, Evan, John, Kyle
7	Appendices	Andrew, Evan, John, Kyle	Andrew, Evan, John, Kyle
7.1	Appendix A	John	Andrew
7.2	Appendix B	John	Kyle, Evan
7.3	Appendix C	Evan	Kyle
7.4	Appendix D	Kyle	John
7.5	Appendix E	Andrew	Evan
7.6	Appendix F	Andrew, John	Kyle, Evan
7.7	Appendix G	Evan, Kyle	John, Andrew
7.8	Appendix H	John	Andrew

7.9	Appendix I	Evan	John
7.10	Appendix J	Evan	Kyle
7.11	Appendix K	Andrew, Evan, Kyle, John	Andrew, Evan, Kyle, John
7.12	Appendix L	John	Kyle
7.13	Appendix M	Evan	Andrew
7.14	Appendix N	Andrew	Evan
7.15	Appendix O	Andrew, John	Kyle
7.16	Appendix P	Evan	John

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Table of Contents:

Abstract	II
Executive Summary	III
Authorship Page	VII
Acknowledgements	XIV
Table of Contents:	XV
List of Figures:	XIX
List of Tables:	XX
1 Introduction	1
2 Background	3
2.1 Anti-Social Behavior	3
2.1.1 Prosecuting Anti-Social Behavior	5
2.1.2 Criticisms of Anti-Social Behavior	7
2.2 Public Space in Lambeth	8
2.3 Littering	10
2.4 Street Clutter	12
2.4.1 Skips	12
2.5 Transport for London	12
2.6 Lambeth Tools	12
2.6.1 Section 87	13
2.6.2 Software Systems	13
2.6.3 Fixed Penalty Notices	13
2.6.3.1 Administration-Free FPN Model	14
2.6.4 Community Safety Officers	14
2.6.5 NSL	15
2.7 Tools In Other Boroughs	18
2.7.1 Tower Hamlets	18
2.7.2 Farthest Gate	19
2.7.3 Kingdom Services Group	20
2.8 Licensing Policies within Lambeth	21
2.8.1 Skips License Application	21
2.8.1.1 Via Gov.uk	22
2.8.1.2 Via email	22

2.8.1.3 Applications to TfL	23
2.8.2 Tables and Chairs Application	23
2.8.2.1 Banding	23
2.8.2.2 Application Process	23
2.8.2.3 Data Entry in Uniform	24
2.8.2.4 Consultation Process	25
2.9 Enforcement of Policies	26
2.9.1 Tables and Chairs Enforcement	26
2.9.2 Skip Enforcement	27
3 Methods	30
3.1 Objective 1: Identify and Characterize Current Lambeth Licensing and Enforcement Tools	32
3.2 Objective 2: Determine the perspectives of the Lambeth community stakeholders regarding the ticket issuing and license application processes.	34
3.2.1 Skip Company Survey	34
3.2.2 TAC Business Interviews	34
3.3 Objective 3: Determine the perspectives of Lambeth Council employees regarding the complete ticketing and licensing procedures.	35
3.3.1 Interviews with Lambeth Council Employees	35
3.3.2 Observations and Interviews of Enforcement Officials	35
3.4 Objective 4: Investigate efficient licensing and enforcement tools and techniques used by other London boroughs.	36
3.5 Objective 5: Recommend both small-scale and large-scale system improvements to increase public compliance and utilize borough resources.	37
4 Problems and Recommendations	39
4.1 Short Term Recommendations	39
4.1.1 Improve Skip Application Submission Process	39
4.1.2 Highlight Lights and Marks License Regulation	44
4.1.3 Inform Applicants of Road Restrictions	45
4.1.4 Create Formal Skip Inspection Policy	46
4.1.5 Create Policy Regarding an Obstructed Skip Spot	47
4.1.6 Automatically Calculate TAC License Application Fees	48
4.1.7 Reformat Online TAC Application Data	49
4.1.8 Eliminate the Banding System	49
4.1.9 Re-Consult TAC Licenses	50
4.1.10 Standardize TAC Consultation Process	51
4.1.11 Implement Quarterly TAC Licenses	51
4.1.12 Automatically Email FPN Payment Information	52

4.1.13 Redistribute Enforcement Officials throughout Lambeth	53
4.1.14 Notify NSL Regarding Paid FPNs Immediately	54
4.1.15 Change CSO FPN Quotas from Monthly to Biweekly	54
4.2 Long Term Recommendations	55
4.2.1 Use Software to Reduce FPN Administration Time	55
4.2.2 Place Ashtrays Outside of Tube Stations	57
4.2.3 Utilize Uniform Data More Efficiently	57
4.2.4 Use Software To Recognize Repeat Offenders	59
4.2.5 Allow Enforcement Officials to Access License Data Remotely	59
4.2.6 Maintain Existing Software	60
4.2.7 Use Software to Streamline Application Approval and Entry Process	61
4.2.8 Compartmentalize Software System Information	61
4.3 Implement a New Software System	62
4.4 Cost Benefit Analysis	63
4.4.1 Improve Skip Application Submission Process	63
4.4.2 Inform Applicants of Road Restrictions	64
4.4.3 Automatically Calculate TAC License Application Fees	64
4.4.4 Reformat Online TAC Application Data	64
4.4.5 Eliminate the Banding System	64
4.4.6 Implement Quarterly TAC Licenses	64
4.4.7 Automatically Email FPN Payment Information	65
4.4.8 Use Software to Reduce FPN Administration Time	65
4.4.9 Allow Enforcement Officials to Access License Data Remotely	65
4.4.10 Use Software to Streamline Application Approval and Entry Process	65
5 Conclusion	66
6 Works Cited	68
7 Appendices	75
7.1 Appendix A: Interview Preamble	75
7.2 Appendix B: Interview with Symology Specialist Kemi Adelaja	76
7.3 Appendix C: Interview with Skip License Application Specialist Jacqui Gayle	79
7.4 Appendix D: Interview with Uniform Specialist Dulcie Williams	80
7.5 Appendix E: Interview with NSL Administrator Anu Vialy	82
7.6 Appendix F: Interview Notes with Street Trading License Administrator Trevor Virtue	84
7.7 Appendix G: Interview and Observation of Lambeth CSO	85
7.8 Appendix H: Section 87 of Environmental Protection Act 1990	87
7.9 Appendix I: Tables and Chairs Banding Class Fee Equation	89
7.10 Appendix J: Front User Panel of Excel Calculator	90

7.11 Appendix K: Skip Company Survey	91
7.12 Appendix L: Skip Survey Results	92
7.13 Appendix M: Tables and Chairs Businesses Interviews	96
7.14 Appendix N: FPN Data	99
7.15 Appendix O: Tower Hamlets Interview	100
7.16 Appendix P: Tables and Chairs Consultation Checklist	102

List of Figures:

Figure 1: Community trigger prosecution process (Anti-social behavior powers, 2017)	6
Figure 2: Civil injunction prosecution process (Anti-social behavior powers, 2017)	6
Figure 3: Total number of anti-social behavior orders issued	8
Figure 4: Results of 2015 Lambeth resident survey	9
Figure 5: Breakdown of litter items found in River Thames 2014	11
Figure 6: FPNs by origin	16
Figure 7: Percentage of FPNs for top ten locations	17
Figure 8: Breakdown of Skip FPN types	28
Figure 9: Skip license and FPN occurrences by Lambeth ward	29
Figure 10: Goals, objectives, and tasks	31
Figure 11: Objective and task schedule	32
Figure 12: Different routes to take in order to reach skip license application	41
Figure 13: Map of Lambeth roads under TfL jurisdiction	46

List of Tables:

Table 1: Metropolitan police categories of ASB	3
Table 2: Money spent annually on cleaning graffiti in selected London boroughs	5
Table 3: Regions of England ranked for average litter	10

1 Introduction

In the United Kingdom, anti-social behavior is a common problem that covers a wide range of offenses from littering to public drinking and urination. Littering costs UK authorities approximately one billion pounds annually, and the London Underground spends ten million pounds and 70,000 man-hours every year cleaning graffiti from its trains and stations (Graffiti, 2018). Besides the high costs for local authorities, anti-social behavior can cause a number of other problems such as lower business revenue, public distress, and adverse impacts on property value, and the quality of life in the community.

Ensuring clean and safe public spaces and streets is one of Lambeth Council's highest priorities, but acts of anti-social behavior such as littering and the placement of excessive street clutter, such as tables and chairs, hinder this objective. Litter allows diseases to spread rapidly, and street clutter creates danger for pedestrians, especially those with disabilities. More extreme cases of anti-social behavior, such as the misuse of fireworks or physical violence, endanger people within the public space. Littering alone costs Lambeth Council approximately £7.3 million a year (Ogundu, 2015). Lambeth's shrinking budget, which has been halved since 2010, makes it harder for the council to implement effective tools and techniques to combat the heavy costs incurred by anti-social behavior. Like other London boroughs, Lambeth Council attempts to mitigate these forms of anti-social behavior by issuing both fines to enforce legislation and licenses to ensure that street clutter does not block public access. The Council wants to ensure that its licensing and enforcement systems are fit for use.

The overarching goal of this project was to increase public compliance with regards to littering and street clutter and to utilize borough resources more efficiently by recommending improvements to the current licensing and enforcement systems. In order to do so, the group identified tools and techniques to make the ticket issuing and license application processes more accommodating, to streamline ticketing and licensing follow up procedures, and to utilize available enforcement tools to their fullest extent. The team identified five objectives to accomplish this goal: (1) identify and characterize current licensing and enforcement tools and techniques employed by Lambeth, (2) determine the perspectives of the Lambeth community stakeholders regarding the ticket issuing and license application processes, (3) determine the

perspectives of Lambeth Council employees regarding the complete ticketing and licensing procedures, (4) investigate efficient licensing and enforcement tools and techniques used by other London boroughs, and (5) recommend both small-scale and large-scale system improvements to increase public compliance and utilize borough resources. This final report for Lambeth Council contains every identified problem and its associated recommendation to improve the overall functionality of the Council's licensing and enforcement systems.

2 Background

In this background section, we briefly review the range and definitions of anti-social behavior (ASB) in the UK and the prosecutorial system. We then focus on the costs of littering, the public space concerns of Lambeth, and the nature of the licensing and enforcement tools the Council uses to ensure quality public space.

2.1 Anti-Social Behavior

In the UK, anti-social behavior comprises a wide range of harmful activities from littering to public drinking and urination. The Crime and Disorder Act of 1998 defines anti-social behavior as “acting in a manner that caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as (the defendant).” The London Metropolitan Police Force classifies anti-social behavior into 13 specific activities (see Table 1) (MPS, n.d.). Street drinking and rowdy or inconsiderate behavior are the most common forms of ASB experienced by English and Welsh adults. Although only 5% of adults reported experiencing or witnessing littering, 30% of them identified littering as a fairly or very big problem in their area (Statistical Bulletin, 2015).

Table 1: Metropolitan police categories of ASB (MPS, n.d)

Category	Description	Percent Adults*
Vehicle abandoned	Any vehicle including damaged and "end of life" vehicles that appear to have been left by their owner.	4.0
Vehicle nuisance or inappropriate use	Vehicles being used in acts, such as street cruising, that cause annoyance to other road users.	4.0
Inconsiderate behavior	General nuisance behavior in a public place or a place to which the public have access, such as private clubs.	8.9
Rowdy or nuisance neighbors	Any rowdy behavior or general nuisance caused by neighbors, such as partying and loud music.	3.1
Littering or drugs paraphernalia	Fly posting and discarding litter, rubbish or drugs paraphernalia in any public place.	5

Animal problems	Nuisance created by animal, including uncontrolled animals, stray dogs, barking, fouling and intimidation.	.8
Trespassing	Any situation in which people have entered land, water or premises without lawful authority or permission.	No Data
Nuisance calls	Communication by phone that causes anxiety and annoyance, including silent calls and intrusive "cold calling" from businesses.	No Data
Street drinking	Unlicensed drinking in public spaces, including parties that encroach the public street.	9.9
Prostitution-related activity	Any activity involving prostitution such as loitering, displaying cards or promoting prostitution.	.3
Nuisance noise	All incidents of noise nuisance that do not involve neighbors (see "Nuisance neighbors" above).	5.5
Begging or vagrancy	Anyone begging/asking for charitable donations in public, without a license, includes sleeping outside or in communal areas.	1.1
Misuse of fireworks	The inappropriate use of fireworks, the unlawful sale or possession of fireworks and noise created by fireworks.	No Data

*Percent of adults in the UK who witnessed specific form of ASB

Anti-social behavior has significant direct and indirect negative impacts on communities. Local authorities must budget to address ASB complaints, conduct enforcement activities, and clean up as needed. Cleaning London's streets of gum alone costs the city as much as £10 million every year and the London Underground spends the same amount every year cleaning graffiti (Graffiti, 2018). Lewisham spent more than £175,000 and other boroughs spent between £3000 and £225,000 cleaning graffiti between June of 2016 and July of 2017 (see Table 2). The high costs of addressing the effects of ASB are more difficult to bear given the recent cuts to most borough budgets.

Table 2: Money spent annually on cleaning graffiti in selected London boroughs
(Capel, 2017)

London Borough	Money spent (£)
London Borough of Hillingdon	£225,480.00
London Borough of Ealing	£220,000.00
London Borough of Hounslow	£210,000.00
London Borough of Hammersmith & Fulham	£181,000.00
London Borough of Lewisham	£177,200.00
London Borough of Bromley	£158,867.58
London Borough of Wandsworth	£112,016.00
London Borough of Merton	£73,042.00
London Borough of Bexley	£68,000.00
London Borough of Brent	£64,400.00
London Borough of Islington	£35,000.00
London Borough of Sutton	£28,850.00
London Borough of Greenwich	£26,050.00
London Borough of Croydon	£25,290.12
London Borough of Camden	£10,122.00
London Borough of Havering	£4,905.75
London Borough of Tower Hamlets	£3,455.96

Indirectly, cleaning up after ASB can have more than direct budgetary costs. Closing down portions of the Underground to clean graffiti reduces citizens' access to transportation, while cleaning gum can crowd public streets. ASB also has a significant negative impact on local business, public health, and quality of life (Litter, n.d.). Litter, public urination, and graffiti damage the appearance of local communities, harming property values and business revenues. A recent study conducted by One Poll showed that in 2011, anti-social behavior cost 20% of businesses an average of £20,000 each (Anti-Social, 29 November 2017). Beyond harming business, the litter and debris left behind by anti-social behavior can be a direct risk to public health by spreading disease (Litter, n.d.).

2.1.1 Prosecuting Anti-Social Behavior

After an official reports an individual for engaging in anti-social behavior, there are prosecutorial options. The severity of the punishment depends on both the severity of the act committed and if it is a repeat offense. The least severe of the prosecution processes is the Community Trigger (Figure 1). An official implements a Community Trigger when a person or persons continually engages in anti-social behavior after receiving multiple citations, and a

victim of those behaviors activates the anti-social Case Review by supplying the details of the incidents. A formal case review determines if the repeat offender should be subject to an action plan.

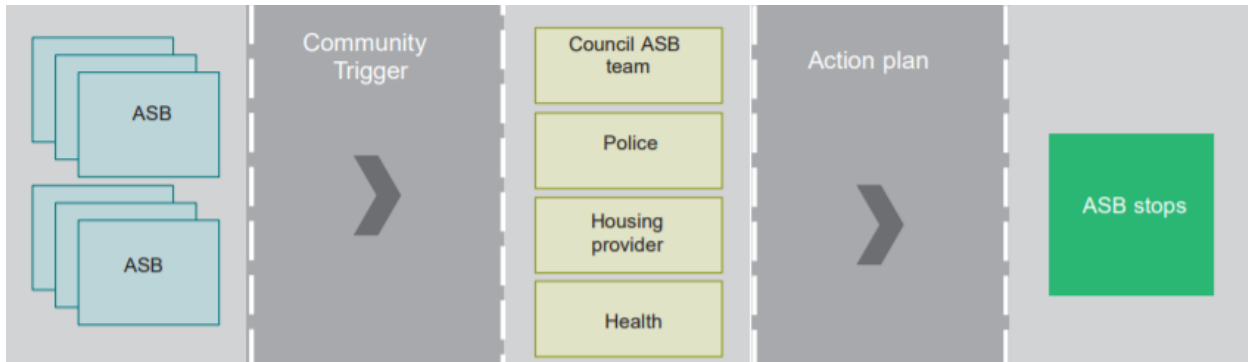


Figure 1: Community trigger prosecution process (Anti-social behavior powers, 2017)

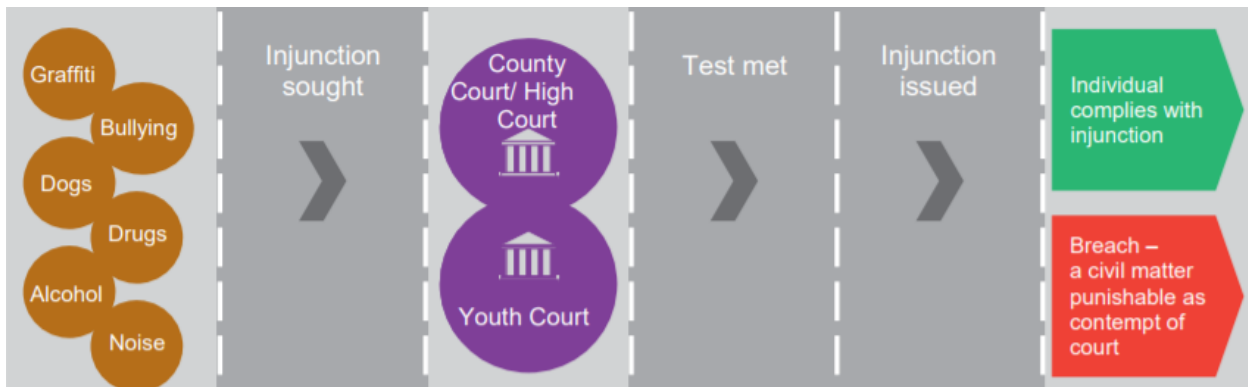


Figure 2: Civil injunction prosecution process (Anti-social behavior powers, 2017)

The courts may issue a civil injunction for prosecuting more serious cases (Figure 2). A civil injunction is “used to deal with a wide range of behaviors, many of which can cause serious harm to victims and communities in both housing-related and non-housing related situations.” (Anti-social behavior powers, 2017). These behaviors can range from acts such as bullying and abusive behavior towards others to vandalism and public intoxication. Offenders go before the High Court if they are over eighteen or the youth court if under eighteen. The courts determine if they should classify the offender’s behavior as “harassment” or “alarm” for non-housing related incidents or “nuisance” for housing-related incidents. The judge then imposes an injunction. If the offender violates the terms of the injunction, adults can face up to two years in prison or a

fine of any amount, while the courts can issue youths a curfew and other required activity, or imprisonment for up to three months in serious cases.

2.1.2 Criticisms of Anti-Social Behavior

The United Kingdom has created a number of new powers to try to deal with anti-social behaviors, including acceptable behavior contracts (ABCs), anti-social behavior orders (ASBOs), parenting orders, parenting contracts, tenancy demotion orders, and anti-social behavior housing injunctions (ASBIs). Researchers like Crawford argue that the “frenetic” creation of these new powers has left little to no time to thoroughly study the impact or effectiveness of ASB policy, causing others like Smith to argue that “much of the critique [of ASB] has been directed at the rhetoric rather than on evidence.” (Smith, 2003). Crawford (2008) argues that the open-ended definition of ASB gives the authorities enormous leeway in creating and enforcing ASB regulations, and blurs the line between crime and disorder, civil and criminal principles, and formal and informal regulatory responses.

The tendency for ASB enforcement to reflect public opinion can have adverse consequences for certain groups such as youths. According to Brown, youths are commonly seen as sources of public disorder by communities, a belief that is both propagated by the tabloid press and reaffirmed by political rhetoric (Brown, 2013). A British Crime Survey which lists "teenagers hanging around on the street" as one of seven major types of anti-social behavior supports the public distrust of youths. As one can see in Figure 3, those below the age of 18 receive over 40 percent of ASBOs issued in England and Wales (Patrycja, 2015).

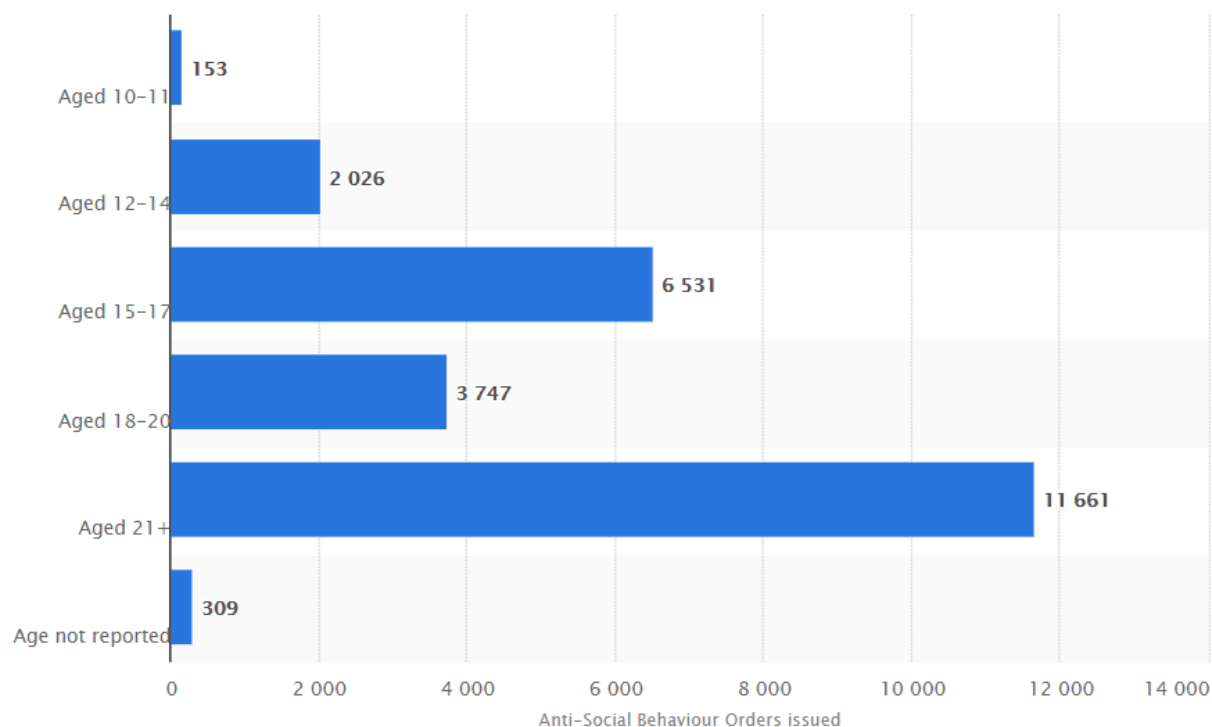


Figure 3: Total number of anti-social behavior orders issued in England and Wales from April 1999 to December 2013, by age group

Youths face significant public distrust and a high quantity of issued ASBOs, which create a persecuting atmosphere for a group that may need help from the community. Despite being a major target of ASB enforcement, youths report more victimization from anti-social behavior than adults. The tension between youths and the older citizens inhibits communication and limits access to public space for a group that feels significantly threatened and needs those resources to cope (Brown, 2013).

2.2 Public Space in Lambeth

London values its public space as places where “the public life of the city is played out and civic identity is defined.” (London, 2016). These places include roads, highways, parks, tourist attractions, public squares, and more. With London’s population projected to increase by almost one and a half million people by 2030, ensuring accessible, high quality public spaces is a

priority for boroughs and citizens alike. Of the public spaces in London, streets are particularly important, and are used in over 80 percent of all journeys in the capital (Murray, 2016).



Figure 4: Results of 2015 Lambeth resident survey

Within Lambeth, a 2015 survey of citizens (Figure 4) identified clean streets and open public highways as two of the top three most important contributors to a high quality of life within the borough. Though many forms of anti-social behavior can reduce the quality of public space, Lambeth identifies street clutter and littering as prevalent threats. In order to mitigate those threats, Lambeth uses licensing to control businesses' abilities to place street clutter such as tables, chairs, and advertisements on highways, and uses enforcement to issue on-site ticketing to reduce littering.

2.3 Littering

One of the most commonplace and costly types of anti-social behavior in the UK is littering. In the words of former Environment Secretary Andrea Leadsom, “Litter is something that affects us all – blighting our countryside, harming our wildlife, polluting our seas, spoiling our towns, and giving visitors a poor impression of our country.” While Leadsom’s comments focus on the UK in general, littering is also of great concern in London (Government, 2017). In a nationwide study of littering, London received a B grade and a score of 2.91 compared with the national average score of 2.66 (Table 3) (Priestley, 2017).

Table 3: Regions of England ranked for average litter (Priestley, 2017)

Region	Average grade	Average score
West Midlands	B+	2.43
South West	B+	2.48
East Midlands	B+	2.49
East of England	B	2.58
North East	B	2.69
South East	B	2.70
Yorkshire and The Humber	B	2.76
Greater London	B	2.91
North West	B	2.93

In an attempt to mitigate littering in the UK, Leadsom enacted a Litter Strategy for England initiative which began in April of 2017. The 2017 strategy makes a series of recommendations for borough councils to deal with littering. These include measures such as providing more public rubbish bins, lowering or removing charges for use of public disposal sites, creating an educational program to teach children about the dangers and effects of littering, and using community service to clean up litter (Government, 2017). The UK has been trying to mitigate littering for several decades but has struggled to attract political and budgetary support or change public behavior. This lack of support can cause insufficient enforcement. In 2017, only

1,571 fly-tipping convictions were made when there were over one million incidents (Department for Environment, 2017). This lack of enforcement has led to additional abuse of the system as many offenders consider the likelihood of penalties to be slim (Motion, S. A. 2015).

Litter, like anti-social behavior in general, has both tangible and intangible costs. The UK directly spends £1 billion annually on litter cleanup and enforcement costs and Greater London spends £3.8 million to remove discarded cigarette butts alone (Motion, S. A. 2015). In addition to these fiscal costs, cleaning up litter requires a tremendous amount of manpower. It took London over 3 months and £150 million to remove gum from a single street (Counting the Cost of Chewing Gum Removal 2014).

There are also numerous indirect costs. Litter harms public spaces by creating pollution, adding health hazards, and harming local businesses (Government, 2017). Pollution from litter poses dangers to wildlife and the environment (Litter Monitoring Results, 2017). London removes approximately 300 tons of litter of various types annually from the Thames River, most of which (65%) is food related waste as one can see in Figure 5 (River Thames and London's Rubbish, 2018). Littering can also cause both physical injuries, such as cuts from broken glass, and allow for the spread of disease (Illegal Dumping & Litter, n.d.). Finally, litter may have adverse effects on the financial wellbeing of neighborhoods by deterring consumers from local businesses (Priestley, 2017).

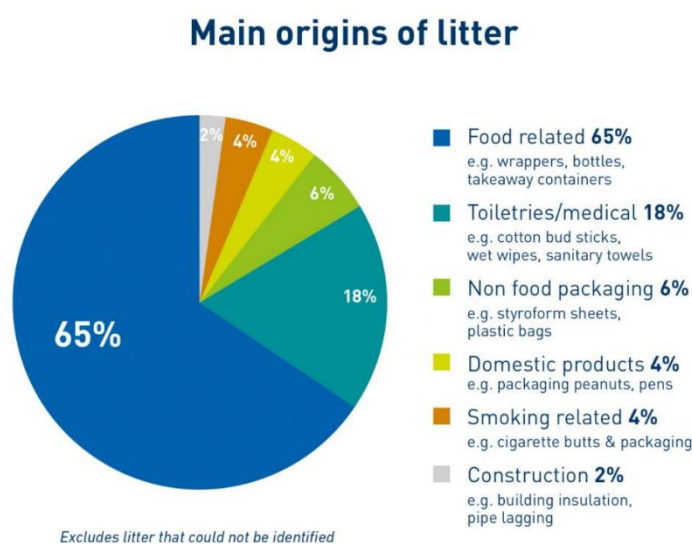


Figure 5: Breakdown of litter items found in River Thames 2014

2.4 Street Clutter

“Street Clutter” encompasses all obstructions placed in public areas from tables to garbage bins. Street clutter is a threat to the public space because it obscures walkways and lowers the appeal of parks and plazas; however, a businesses’ tables and chairs can bring noise and other forms of ASB to residential areas (Virtue Consultation, 2018). Some forms of street clutter though, such as the placement of outdoor tables and chairs, are necessary both to allow for businesses to grow and expand and to create quality community centers, while garbage bins allow for waste to be easily disposed of in an area. The council is working to strike a balance between limiting harmful street clutter while allowing the community to thrive and grow (Virtue Consultation, 2018).

2.4.1 Skips

A skip is a large, open-topped container that people can fill with debris or other waste. Lambeth requires companies to apply for licenses to place skips because they become street clutter that take up space on public highways and roadways (Fawcett, *Skips Licensing and FPN data*, 2018). When a skip company takes away a full skip, a new one can be replace it if the skip company so chooses to re-apply for their license in that specific area.

2.5 Transport for London

Transport for London (TfL) is a local authority responsible for the transport system in Greater London. It controls key road routes in the city as well as the London Underground and Overground. Lambeth, as well as some other boroughs, hand certain highway responsibilities to TfL. These responsibilities mainly include approving skip license applications for skips that companies want to place on roads controlled by TfL.

2.6 Lambeth Tools

Lambeth uses various legislation, software, and third-party contractors to assist in licensing and enforcement.

2.6.1 Section 87

Section 87 (Appendix A) is a segment of the Environmental Protection Act of 1990 that details environmental offenses such as littering, spitting, and public urination. It contains six guidelines for local authorities, such as Lambeth Council, to follow for the enforcement of environmental offenses. These guidelines specify where one cannot throw, drop, or place litter, what defines whether an environmental offense has taken place or not, and how much an environmental offense fine can be (Legislation.gov.uk, 2018).

2.6.2 Software Systems

The Council uses Symology to create and store skip license data. Currently, there are 31 steps to complete in order to process a skip license (Gayle Skip License Application Form, 2018). Employees must keystroke by hand individual license acceptance and rejection emails and must refer to a list of controlled parking zones in a separate window when reviewing a skip's address. Symology requires employees to place a marker on a virtual map exactly where a company wants to place a skip. Occasionally a company cannot place a skip in its specified location due to an obstruction such as a parked car. In this case, skip companies usually place the skip in a nearby area and contact the council, who updates the map marker based on where the skip company placed it (Adelaja, 2018).

Uniform is a database software system that Lambeth Council uses to store information including TAC license applications, fixed penalty notices, and other licensing and enforcement data (Williams, 2018).

2.6.3 Fixed Penalty Notices

Enforcement officials can issue fixed penalty notices (FPNs) for a variety of offenses. These offenses range from anti-social behavior acts, such as littering or spitting, to businesses breaking the terms of their licenses for skips or tables and chairs (TAC). FPNs do not require judicial oversight and they streamline the legal process to enforce smaller crimes more frequently. They carry fines from £40 to £400 based on the type of offense committed. If the offender does not pay the fine within 14 days, the FPN's fee increases. If an FPN is unpaid for 14 days, councils may choose to bring the offender to court (Fixed penalty notice, 2018). The

offender can pay their fine by logging into a Lambeth Council website and providing the FPN number written on their ticket, or by calling the Council directly. If the offender loses their ticket, they must contact Lambeth Council to find out their FPN number.

To issue an FPN enforcement officials in Lambeth use a carbon copy pad to collect information from the offender. The official gives the FPN to the offender along with instructions on how to pay for it. After the official issues a ticket, they must bring the ticket back to the office where it takes roughly ten minutes to enter it manually into Uniform (Vialy, 2018).

2.6.3.1 Administration-Free FPN Model

In Lambeth Council, there are currently many steps in order to process an FPN that involve various council employees in addition to the official who issued it. The borough desires to remove all administrators in the FPN issuance and payment process apart from the official who issues the FPN. Minimizing the amount of administration required to process a single FPN will reduce both the amount of time each FPN takes to process and improve the offender's overall experience by reducing the possibility of mistakes throughout the FPN process (Fawcett, 2018).

2.6.4 Community Safety Officers

In the borough of Lambeth there are a total of 13 Community Safety Officers (CSOs). The duty of the CSOs is to deal with public complaints, issue FPNs to enforce anti-social behavior, and assist in various application processes within their ward. As there are 21 wards within Lambeth some CSOs are in charge of overseeing more than one ward making the job of the CSO much more difficult because of the higher amount of area they patrol. Each individual CSO decides the order that they complete enforcement tasks, as some simply complete the tasks in the order that they receive them in, while others complete them "by prioritizing them, and attacking them one by one" (Anonymous CSO, 2018). While a CSO is patrolling their respective ward, they are also constantly on the lookout for individuals engaging in ASB. By enforcing anti-social behavior, the CSO is creating a safer environment for all of the citizens within that ward and within Lambeth as a whole.

CSOs enforce a wide range of violations by issuing FPNs and are responsible for entering the FPNs they issue into Uniform. When issuing an FPN, a CSO must write down the offender's

personal details as well as what offense they committed onto a carbon copy ticket. Once the CSO issues the FPN, they keep a copy of the ticket and return it to the Council for record keeping. When the CSO returns to the Council, they must manually enter the FPN information into Uniform, which allows the offender to pay the fine for their ticket. If a CSO does not enter an FPN into Uniform, then there is no way for the Council to keep track of that FPN. CSOs are also responsible for conducting the follow up procedure for every FPN that they issue. This procedure includes notifying an offender that their fine has escalated if they have not paid their FPN within 14 days.

Although CSOs have the power to write FPNs and enforce laws against anti-social behavior, they are not police officers, and often cooperate with police officers when investigating crimes such as drug solicitation (Anonymous CSO, 2018).

2.6.5 NSL

NSL is a third-party environmental enforcement agency that Lambeth contracts to enforce Section 87 offenses, such as littering, spitting, and public urination. They provide the borough with extra enforcement officials who the Council authorizes to patrol and issue FPNs. Currently this group has eight staff members that work within Lambeth directly, six of which are enforcement officials, one is an administrative employee, and one is a managerial liaison to the Council. Due to terms within their contract, NSL keeps any revenue from issued FPNs up to a certain amount of money annually. If the amount of revenue made from issued FPNs exceeds that certain amount, then a portion of the extra revenue goes to the Council (Vialy, 2018). Since the employment of NSL however, this amount has not been reached, and therefore the Council has not received any revenue from this contract. NSL FPN data also shows that it is highly unlikely that they will ever exceed that revenue target. Therefore, the Council will never receive a portion of that revenue (Brown, 2018). Since Lambeth employed NSL in November of 2016, there has been a considerable increase in the number of FPNs issued. NSL focuses all of their time on Section 87 enforcement whereas Lambeth CSOs focus on other tasks, such as license enforcement, as well as Section 87 enforcement. NSL issues on average roughly 19 times as many FPNs as Lambeth CSOs do per month, because they solely focus on Section 87 enforcement. One can see this FPN data in Figure 6 (FPN Data, 2018).

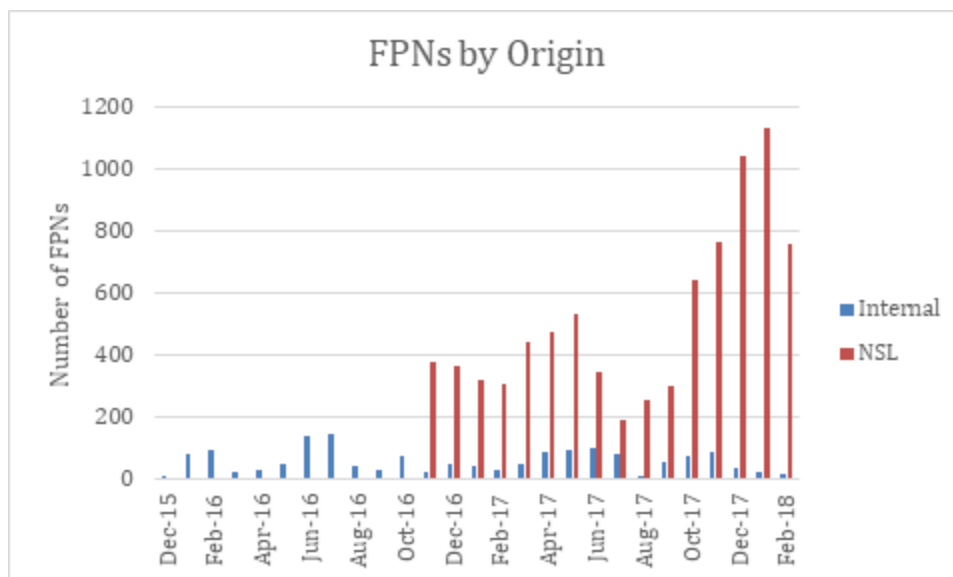


Figure 6: FPNs by origin

The Council gives NSL full autonomy regarding the ways they hire and dispatch their patrolling officials. Typically, NSL will station these officials outside of litter hotspots, the three largest of which are Waterloo Station, Vauxhall Station, and Brixton Station. Figure 7 shows that enforcement officials issue 40% of all FPNs at these three stations. The wards of Bishop, Coldharbour, and Oval have considerably more FPNs issued than all the other wards because of these Underground stations (Appendix N). Of all the FPNs that NSL issues, the vast majority of them are for dropping cigarette butts, but they also enforce acts such as spitting and dog fouling (Vialy, 2018). If an enforcement official catches an offender committing a Section 87 offense, the enforcement official approaches them, informs them of the infraction, and asks them for their information such as name and address in order to issue them an FPN. Often times the offender is not compliant though, leading the enforcement official to call the police and wait for their arrival. Should the offender flee the scene, the decision of whether or not to pursue the individual is up to the enforcement official and depends on the potential of possible danger (Vialy, 2018).

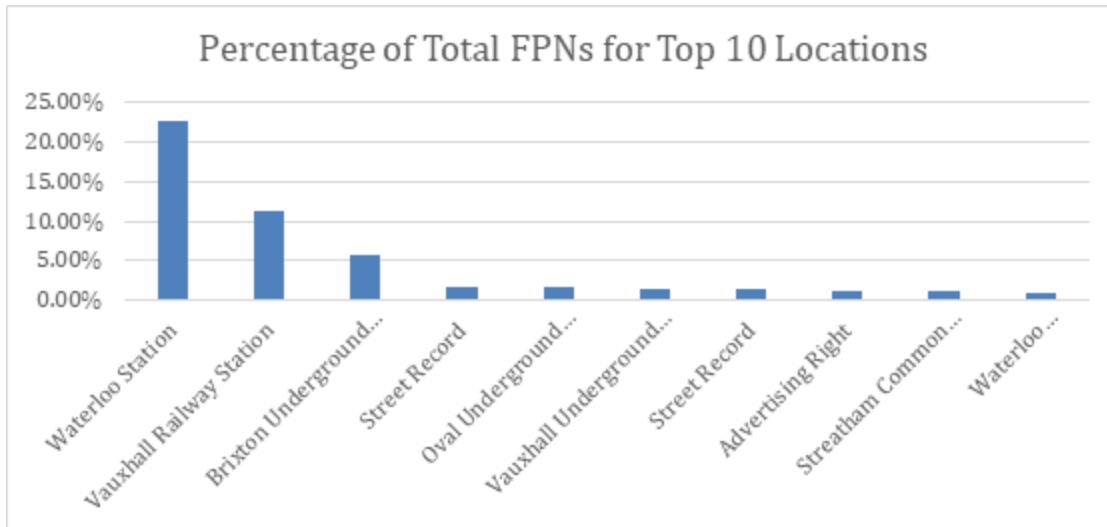


Figure 7: Percentage of FPNs for top ten locations

Unlike CSOs, NSL enforcement officials must give the carbon copies of the tickets they issue to an administrative employee who then enters them into Uniform. Additionally, the administrative employee is responsible for any follow up actions that NSL takes rather than the officials themselves. NSL has tablets and portable printers that officials who work in other boroughs use, but the officials employed by Lambeth Council cannot use them as they do not interact with Uniform. NSL does not send copies of an FPN via email to the offender because they use a paper notepad system. This system makes the ticket difficult to pay for and allows the offender to use it as an excuse as to why they have not paid their FPN. Once an enforcement official issues an FPN, the offender has to go through Lambeth Council to pay their fine, and the Council has to redirect this money to NSL. If this process takes too long or the offender does not complete it, then NSL will issue an escalation notice to the offender stating that their fine has increased (Vialy, 2018).

2.7 Tools in Other Boroughs

2.7.1 Tower Hamlets

Tower Hamlets (TH) is a borough in East London which issues licenses to businesses that allow them to put tables and chairs (TAC) outside of their premises. TH Council uses the Local London Authority Act 1990 to enforce their licenses, which is the same legislation that Lambeth Council uses to enforce their licenses. The Council does so with the goal of regulating highway traffic in order to provide a safe and accessible space to the public, and to recover administration and license printing costs (Tower Hamlets Interview, 2018). TH Council, like Lambeth Council, uses CSOs to conduct site visits as part of the license application process. During this process the CSOs measure the area that the business is applying for as well as take a picture of the area for reference. They then conduct a re-consultation every few years in order to ensure that businesses continue to comply with their license regulations.

Despite the similarities of their goals, there are several significant differences between the two borough councils' methods for issuing licenses (Tower Hamlets Interview, 2018). The first of these differences is that TH only issues temporary six-month licenses, as opposed to the permanent licenses that Lambeth issues as of 2008. The businesses within TH take advantage of this six-month system and frequently apply for more area during the nicer summer months than they do in the winter, where there is much less foot traffic. TH Council uses these temporary licenses because it allows them to revoke a license if a business is not being compliant without having to take them to court (Tower Hamlets Interview, 2018). This licensing method gives the Council more control over the licenses they issue as well as allows them to enforce licenses in the rare event of extreme anti-social behavior much easier.

Currently TH Council uses a paper system to apply for licenses and businesses can use either a check to pay or pay over the phone; however, the TH Council will be changing to a web system similar to the one Lambeth uses shortly. This web system however, still requires business owners to come into the Council to verify their identity as part of the application.

Another major difference between the two boroughs is that TH Council issues TAC licenses based upon the amount of area they occupy on the highway outside of the premises rather than Lambeth Council's method of charging the applicant per chair per hour outside. TH

Council charges an applicant £120 for the base application fee, £12.85 for shop front displays, and £1 per square meter per hour per day (Tower Hamlets Interview, 2018). They also do not use license bandings to rank areas in terms of foot traffic like Lambeth Council does. TH Council were considering adding a banding system but believed that it would be too difficult and require too much administration (Tower Hamlets Interview, 2018). Additionally, TH Council consults some other internal departments when they are deciding whether or not to approve a TAC license. For instance, they consult the Metropolitan licensing department when a business that serves alcohol applies for a TAC license. This consultation takes place to ensure that the business does not have any outstanding issues relating to alcohol induced anti-social behavior.

2.7.2 Farthest Gate

Farthest Gate is a software company that offers a wide variety of software services to different clients such as the London borough of Hackney. Farthest Gate provides Hackney with a software known as Liberator, which revolutionized the way that officials issue FPNs for Section 87 offenses and license violations, as well as the way that the Council stores license data within the borough. Before the use of the Liberator software, Hackney had an outdated and time-consuming process in place to issue and record FPNs similar to what Lambeth uses currently. An enforcement official would have to stop the offender, copy down all of their personal information into a carbon copy notebook by hand, and then return to the office at the end of their shift to personally enter all of the FPN data into their data storage system. This process allowed for the possibility of offenders lying about their personal information as the officials did not check the offender's ID. It also created problems with the payment system, as offenders would have to call Hackney Council to pay. The entire process of FPN issuance to payment took a minimum of five days. The official must also provide a personal statement that summarizes the recorded information. Writing this evidence and creating a statement by pen and paper wasted valuable time for the officials and took more of the offender's time than was necessary (Farthest Gate, 2018).

The Liberator software solved these problems by making the process of issuing and storing an FPN completely digital. An enforcement official can remotely log onto the software via a mobile android phone while on duty. The official can directly input all of the offender's information, such as name, age, address, and email address, and then verify that the information

provided is correct through Liberator's ID verification system. Once the enforcement official enters all of the offender's information into the system, they use a paired portable printer to issue the FPN to the offender. If the offender decides to run away after the official records their information, the official can still issue an FPN via email. Liberator allows the enforcement official to quickly enter detailed information for the FPN case on their mobile device and automatically stores this evidence in a file attached to the FPN. It makes adding evidence to an FPN case after the initial issuing much easier as well. Hackney does not use video evidence, but Liberator allows an official to store video files from their body camera or mobile device with the FPN case. After an enforcement official records all the information, the software automatically creates the official's personal statement for them based on that input information to save them time while on duty. Liberator also makes the offender's payment experience simpler, as they can pay for their FPN through an online portal on Hackney's website. In addition to offering Section 87 enforcement services, Farthest Gate also works on software for licensing systems such as tables and chairs licenses (Farthest Gate, 2018).

Farthest Gate works with councils to adapt their software to fit their client's needs. For example, Hackney's software calculates the fee of their tables and chairs license based upon the amount of area outside of the businesses that they will use for tables and chairs. Farthest Gate can update their software for a different borough that calculates their tables and chairs license application via the number of tables and chairs that the businesses will have (Farthest Gate, 2018).

2.7.3 Kingdom Services Group

The borough of Brent employs a third-party contractor, known as Kingdom Services Group, that deploys enforcement officials into problem areas throughout the borough to deal with environmental offenses such as littering, dog fouling, and public urination (Environmental, 2018). Rather than charging boroughs for their services, Kingdom instead recovers all of their costs by the FPN fees they recover. Kingdom has a 75% payment rate for all FPNs they issue, which is relatively high when compared to many other London boroughs. For example, Lambeth has a 70% payment rate for all FPNs that they issue, which is much better than other boroughs which are typically around 50% (Fawcett, 2018). Kingdom's enforcement officials engage in an extensive training program where they learn how to conduct themselves under strict legal

guidelines. These officials also have access to a virtual mapping software which stores local demographic data that officials use to patrol the highest priority areas at any given time (Environmental, 2018).

2.8 Licensing Policies within Lambeth

Lambeth uses licenses to regulate its businesses' placement of street clutter such as tables, chairs, skips, and advertisements in public spaces. Regulations deter needless clutter in places such as sidewalks and street corners, which must be easy to traverse.

The first of these licenses allows business and restaurants to put tables and chairs outside on public walkways to provide additional seating. In order to obtain this license, businesses must pay an initial application fee of £350 in addition to an hourly fee for each chair over two. This hourly fee varies based upon the location of the business and time of use and ranges between £10 and £50 per hour. Lambeth officials base their approval of the license on how obstructive the furniture is and the impact the furniture may have on nearby residents. The license itself lasts for a maximum of 1 year from April 1st to March 31st, after which the business must reapply (Apply for a tables and chairs license, 2017). Other licenses allow for local businesses and shops to display merchandise and advertisements on public streets. As with the licenses discussed above, the applicant must pay an application fee of £135 in addition to a license fee which ranges from a flat rate of £250 to £465 based on which district of the borough the business occupies (Apply for a shop front license 2017). The approval for and duration of these licenses is the same as the tables and chairs licenses. Finally, licenses are also used to regulate scaffolding and skips in public spaces. Waste management companies must pay a fee to that ranges from £44 to £60 in order to have a skip in a public space (Apply for a skip license, 2017). In order to erect scaffolding on a public street, a licensed contractor must pay a fee of £576 with a yearly renewal fee of £384 (Highways licenses, 2018).

2.8.1 Skips License Application

Currently, customers must use the Gov.uk application process to receive an initial license in order for Symology to have their information in it. To receive this license, the customer must have 5 million pounds of insurance. Once the customer obtains their initial license, they must

apply for a single license for every skip they wish to place. These single licenses last for one month, but skips are rarely placed for the duration of their license (Fawcett, Project Plan). There are three ways to apply for a single skip license: through the Gov.uk website, through email, or through paper mail. Customers primarily apply for licenses through either Lambeth's website or the Gov.uk website. The team will not be providing background research on the application process via paper mail as all recommendations we make for the application process via email will also apply to paper mail applications. In Lambeth, skip licenses in many areas also require a company to complete a parking suspension five to seven days before they submit their license application (Adelaja, 2018).

2.8.1.1 Via Gov.uk

The team identified two methods of reaching the Gov.uk website's application. First, their search engine will redirect applicants searching the web for "Apply for a skip license Lambeth" or similar terms to Lambeth's skip application webpage, which immediately instructs the applicant to use the Gov.uk website (and provides a link). Second the Gov.uk website can redirect applicants, who begin the process on the Gov.uk website who use the in-site search and provide a Lambeth postal code, to the same application process linked by Lambeth (Adelaja, 2018).

The application process frequently redirects users to new sites and pages, and requires the applicant to download a PDF, which requires special software such as Adobe Reader to edit, and they must then be re-uploaded. The application itself is over six pages, but the council only uses two pages of information to approve licenses. Unlike the email submission, this process requires applicants to pay for their license fully before Lambeth can approve or reject their application (Adelaja, 2018).

2.8.1.2 Via email

Customers can download, complete, and email a Lambeth-made form to the council to apply for a skip. Emails are sent to the council correspondence team and transferred into an environmental folder in Symology, so the permissions team can review them. Currently Lambeth does not advertise this method of applying on their website and directs users to the Gov.uk website instead (Adelaja, 2018).

Unlike the Gov.uk website, the email application does not require applicants to pay when they submit. Instead, they write their card information on the application form and a Lambeth council employee charges their card if and when they approve their application. Lambeth Council is currently drafting a new form which will no longer ask the customer for payment information. Instead, when the council is ready to accept an application they will send a confirmation email with a payment link, and only accept the application after the payment has been made (Adelaja, 2018).

2.8.1.3 Applications to TfL

Various roads in Lambeth are under the jurisdiction of TfL. Unlike some other boroughs, Lambeth requires customers to apply directly to TfL. Since they do not describe this rule on their website, customers occasionally submit applications directly to Lambeth which the council then has to forward from to TfL engineers (Adelaja, 2018).

2.8.2 Tables and Chairs Application

In order to regulate the placement of street clutter, Lambeth Council issues tables and chairs licenses to businesses.

2.8.2.1 Banding

The borough of Lambeth is currently broken up into three different geographic regions (or bandings) for the purpose of calculating the application fee. The council determines these banding by the amount of foot and car traffic present in the area. Band A is the busiest, whereas B and C have less traffic. Applications in busier bandings have a higher base application fee. Almost all applications fall into band A, but businesses sometimes lie on their application form and apply with a cheaper band to try and save money (Williams, 2018).

2.8.2.2 Application Process

In the borough of Lambeth, a business, or an agency working on their behalf, must apply for a license to be able to keep TAC outside of their shopfront. This process is in place to allow the council to regulate the use of public space and limit street clutter. The applicant must go onto the Lambeth Council website and either complete an online webpage application or download a

paper application that they can fill out and mail. However, as the council is moving towards a paperless system they have incentivized the use of the online application by lowering its application fee. In order to successfully apply for a license a business must provide several pieces of information on the application. The applicant must first include the number of tables and chairs they intend to put out on the premises along with the times that they will be present outside. The applicant must also provide a technical drawing of the front of the premises, which an employee can use as a factor in the decision of granting a license. A council employee must confirm this information during site consultations to ensure that these numbers are accurate. Finally, the applicant must calculate the application fee themselves and pay during the process, as either a check or online card payment. Lambeth Council only uses this application fee to recover the costs that they spend on distributing and enforcing these licenses. A reduction in costs for the council should lead to a lowering of fees paid by applicants. The fee is dependent upon a number of factors, including the number of tables and chairs to be put out, the number of hours the furniture will be left out after 7:00pm, and the banding of the street. Finally, online applications are slightly cheaper than paper ones because they require less time to process. The application fee is very difficult for the applicant to calculate. As a result, roughly half of all applications have an incorrect payment amount. In addition, the base fee is due to change from £111 to £99 soon, but council employees do not know when this change may occur and therefore are not sure what the correct cost is (Williams, 2018).

2.8.2.3 Data Entry in Uniform

Once the council receives this application council employee verifies that the information is correct, then enters it into a database called Uniform. Uniform is a database software system that Lambeth Council uses to store information including license applications, FPNs, and other licensing and enforcement data (Williams, 2018).

The council employee entering the application must verify that certain information that is frequently entered incorrectly is correct such as the banding and license fee. First, to verify the banding on the application is correct the employee must consult a list of Lambeth street addresses sorted by banding. This process takes around one minute. Second, to verify the license fee the employee must use a calculator and re-calculate the fee based on the application

information. This process can take upwards of 10 minutes to complete due to the complexity of the equation (Williams, 2018).

When entering license information Uniform has several useful features. Any information businesses, agents, or persons previously entered into Uniform can be auto-filled into new applications by the system. Furthermore, when renewing a license Uniform will import data from the previous application so that an employee will only need to change the fields that have changed since the previous application such as the dates. Additionally, Uniform the council to save incomplete licenses if some information such as payment is missing where they can finish the application later once payment is made. During this process the council employee approving the license then can use Uniform to check information such as the application fee and the banding to ensure that the business has these values correct. If there are any issues with the application the Uniform database generates a prewritten letter that a council employee edits and emails to the applicant. Applicants and council employees go through this process to apply for a TAC license (Williams, 2018).

2.8.2.4 Consultation Process

Once a Lambeth employee receives a TAC application and enters it into Uniform they dispatch a CSO to conduct a consultation to ensure that the business will follow their proposed license conditions. During this site visit the CSO measures the distance from the curb or any obstructions such as a bus stop or trees on the highway, to the table and chairs area and ensures that there is a distance of at least 1.8 meters between the edge of the licensed area and any obstruction. Additionally, the TAC cannot extend more than 1.3 meters from the shopfront into the public space, so as to not interfere with foot traffic; however, CSOs are flexible with this requirement. The CSO also tries to consider the impact that the TAC will have on the area as the council aims to bolster small businesses and community centers without having an adverse effect upon residents. Factors such as proximity to housing, the businesses' hours, how the license holders plans on dispersing patrons upon closing, and if the granting of a license will lead to an increase in anti-social behavior such as litter or public urination are all considered. Much of this process is currently done on a subjective basis where the CSO inspecting the premises makes judgment calls regarding the granting of the license. They tend to be more lenient towards smaller business when compared to chains and are more likely to approve the license if it would

lead to a better community center. This consultation then determines if the council will grant a license to the premises (Anonymous CSO, 2018).

2.9 Enforcement of Policies

The Borough of Lambeth uses a variety of enforcement tools to deter littering and regulate street clutter licenses (Fawcett Phone Interview, 2018).

2.9.1 Tables and Chairs Enforcement

When inspecting tables and chairs licenses, enforcement officials ensure that businesses hold the correct license for their area in Lambeth, have the correct quantity of furniture as defined by their license, and have placed their furniture in a non-obstructing manner. The Council can fine businesses that fail to have the appropriate license or follow a held license up to £1,000 and they can prosecute them in severe cases (Apply for a tables and chairs, 2017). The Council based these fines on two main pieces of legislation that they use to regulate as well as enforce the TAC licenses that they grant to businesses. The Highways Act of 1980 and the London Local Authorities Act 1990 both address different areas of the TAC licensing process (Virtue Legislature, 2018).

The Highways Act of 1980 covers a broad range of highway practices, and Lambeth Council uses them to enforce incidents involving tables, chairs, and other places' structures. The Highways Act of 1980 simply outlines what is, and is not, allowed in regard to placement of objects, such as tables and chairs, on public highways and how much space they can occupy before it qualifies as disrupting the public realm. An example of an offense punishable through the Highways Act of 1980 would be any object that a business places in front of their premises that causes damage to the highway itself. The punishment for this offense would be to simply pay for the necessary repairs to the highway. These punitive actions would be to ensure that they do not damage the highway in a similar manner in the future (Virtue Legislature, 2018).

The London Local Authorities Act of 1990 is the main piece of legislation used by the borough of Lambeth for enforcing the regulations outlined in the tables and chairs licenses. This act regulates all "street trading," which tables and chairs licenses fall under. The law categorizes street trading in terms of what a business is advertising through the objects within their

storefront. If a business has an advertisement in front of their store for cigarettes, but the license that they possess is for a florist, they are in violation of their license because the advertisement does not relate to the goods that the business sells and violates the “spirit of the license.” (Virtue Legislature, 2018)

The main difference between the Highways Act of 1980 and the London Local Authorities Act 1990 is that the first pertains to punitive measures that the law takes against businesses, while the latter encourages the growth of businesses by laying out what businesses can and cannot use in the public realm (Virtue Legislature, 2018). Additionally, the Highways act is a nationwide policy and the London Local Authorities Act is specific to London.

Once the Council issues a business a tables and chairs license, there is no follow up procedure that is provided by the Council. Businesses are not re-consulted in the future to ensure that their tables and chairs are in compliance with the regulations set out within their licenses. The only time a follow up consultation is held is when members of the community file a complaint about the business with regard to how they are utilizing the public space in front of their business, thus causing a disturbance to the community around them (Virtue Consultation, 2018).

2.9.2 Skip Enforcement

A similar process also exists for the placement of skips in public space. Enforcement officials inspect skips to confirm that they do not obscure public highways or create a safety hazard within the public space. Enforcement officials issue violators an FPN with a cost based on the type of violation, but skips with no company information on them can be hard to track down and issue the FPN to. Lambeth Council prosecutes all companies who do not to pay the fine (Apply for a skip, 2017).

To ensure that the businesses are following the terms of their licenses, Lambeth Council has a group of enforcement officials who travel within the borough. One of the main duties of these enforcement officials is to check the different skips throughout the borough and make sure that they are following the set of regulations laid out within their respective licenses. These regulations include factors such as having lights placed on the skip to illuminate it at night and marks to indicate what skip company placed it, placing the skip with its longer sides parallel to the street, placing skips a minimum of 18.3 meters from traffic lights, and many more

(Application, n.d.). Enforcement officials use Symology to see which skips have licenses on given streets. Symology cannot be easily accessed remotely, so officials must return to the office to compare information on skips they saw on the street with licenses stored in Symology.

These enforcement officials also issue a wide variety of tickets in relation to skips each month. The most frequently written FPN is for not having the correct lights or markings on a skip. There have been 741 FPNs written for no lights or marks, which is 100 more than all other skip FPNs issued combined since July 2016, as one can see below in Figure 8. Skip companies frequently fail to place lights on their skip and sometime place lights that do not function (Fawcett *Skips Licensing and FPN data, 2018*).

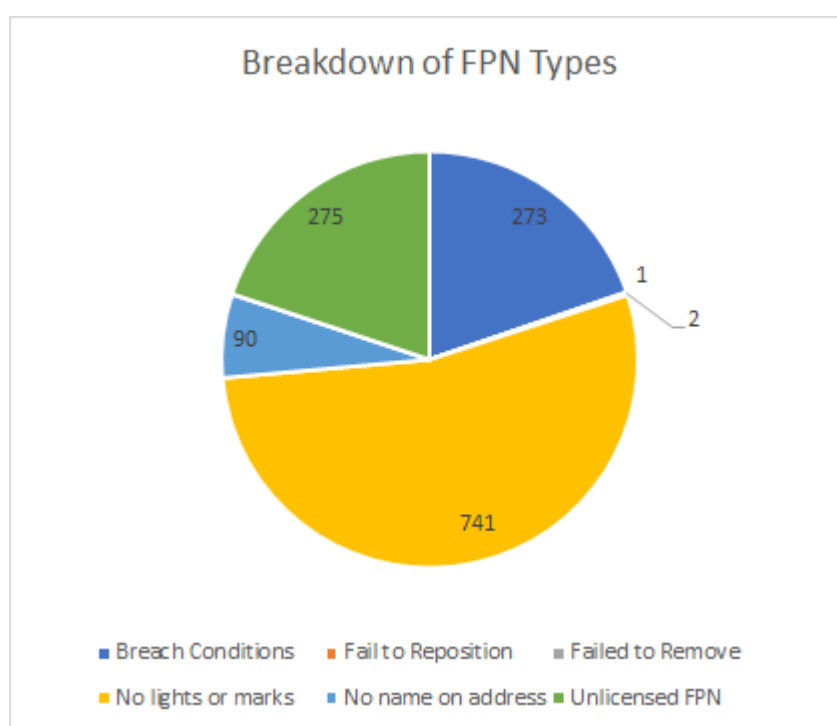


Figure 8: Breakdown of Skip FPN types

Currently CSOs have a monthly FPN quota. Some CSO focus on issuing FPNs earlier in the month by spending more time enforcing skips and other highways licenses. Currently, the Council is drafting a schedule for future CSOs. The schedule for checking skips within the borough has an equal amount of time allocated to each of the four enforcement officials to survey areas of the borough. These areas consist of the 21 Lambeth wards. Certain wards within the borough have a higher number of skips in comparison to others as one can see in Figure 9

below (Fawcett *Skips Licensing and FPN data, 2018*). For example, the southern wards usually contain more skips than the other wards. Depending on the time of the month as well, there may be more or less skips in different areas due to different license holders' needs (Fawcett, January 2018).

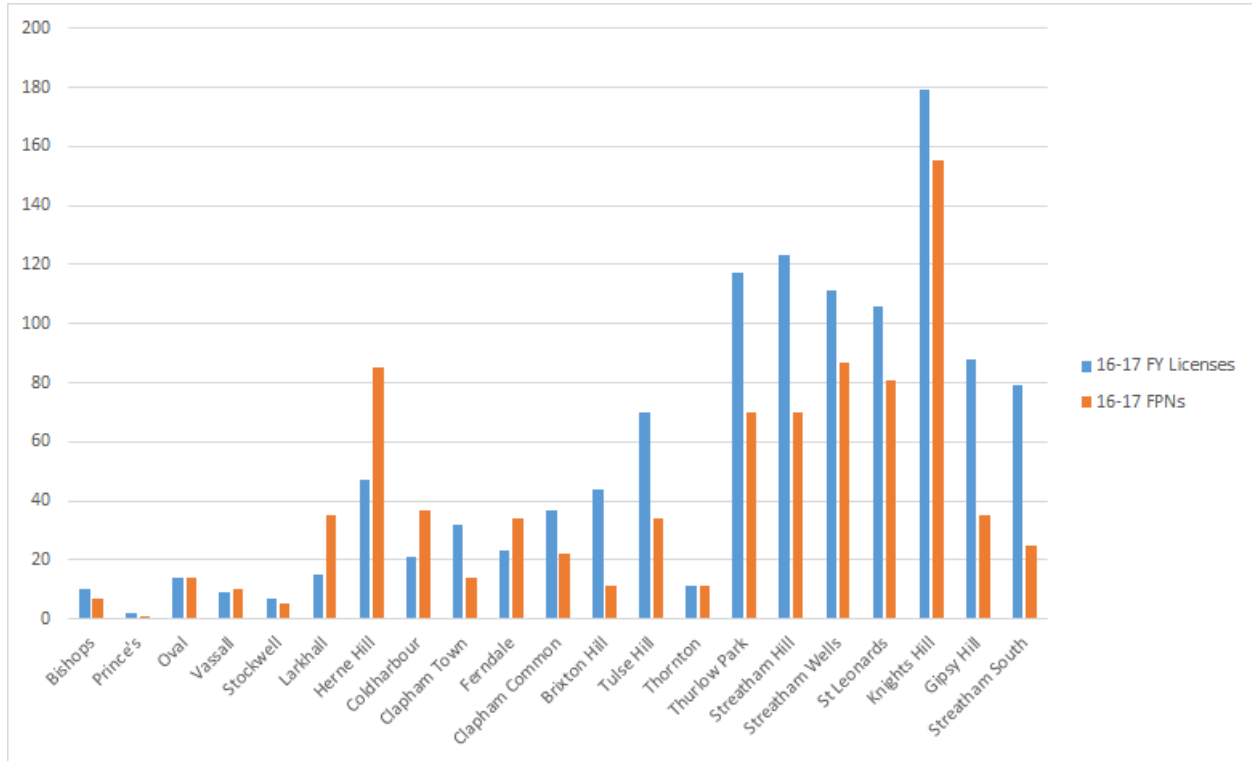


Figure 9: Skip license and FPN occurrences by Lambeth ward

3 Methods

The overarching goal of this project was to increase public compliance with regards to litter and street clutter, and to utilize borough resources more efficiently by recommending improvements to the current licensing and enforcement systems. In order to do so, the team identified tools and techniques to make the ticket issuing and license application processes more accommodating, to streamline ticketing and licensing follow up procedures, and to utilize available enforcement tools to their fullest extent. The five objectives the team set to accomplish this overarching goal are as follows:

1. Identify and characterize current licensing and enforcement tools and techniques employed by Lambeth.
2. Determine the perspectives of Lambeth community stakeholders regarding the ticket issuing and license application processes.
3. Determine the perspectives of Lambeth Council employees regarding the complete ticketing and licensing procedures.
4. Investigate efficient licensing and enforcement tools and techniques used by other London boroughs.
5. Recommend both small-scale and large-scale system improvements to increase public compliance and utilize borough resources.

From those objectives the team created a list of tasks to complete. Figure 10 demonstrates the tasks that the team completed that correspond with each objective. Due to the team's limited access to information within the Council, the team chose to address topics in the order the Council presented information, rather than follow the original schedule. The four topics that the team separated the project into were skips, tables and chairs (TAC), Section 87, and enforcement. The team spent roughly one week applying our tasks to each topic by conducting interviews, studying data, and observing employees. We summarized our findings for each topic in a series of four smaller sub reports which we merged into this final report. Figure 11 shows the schedule of our work on each topic and the final report.

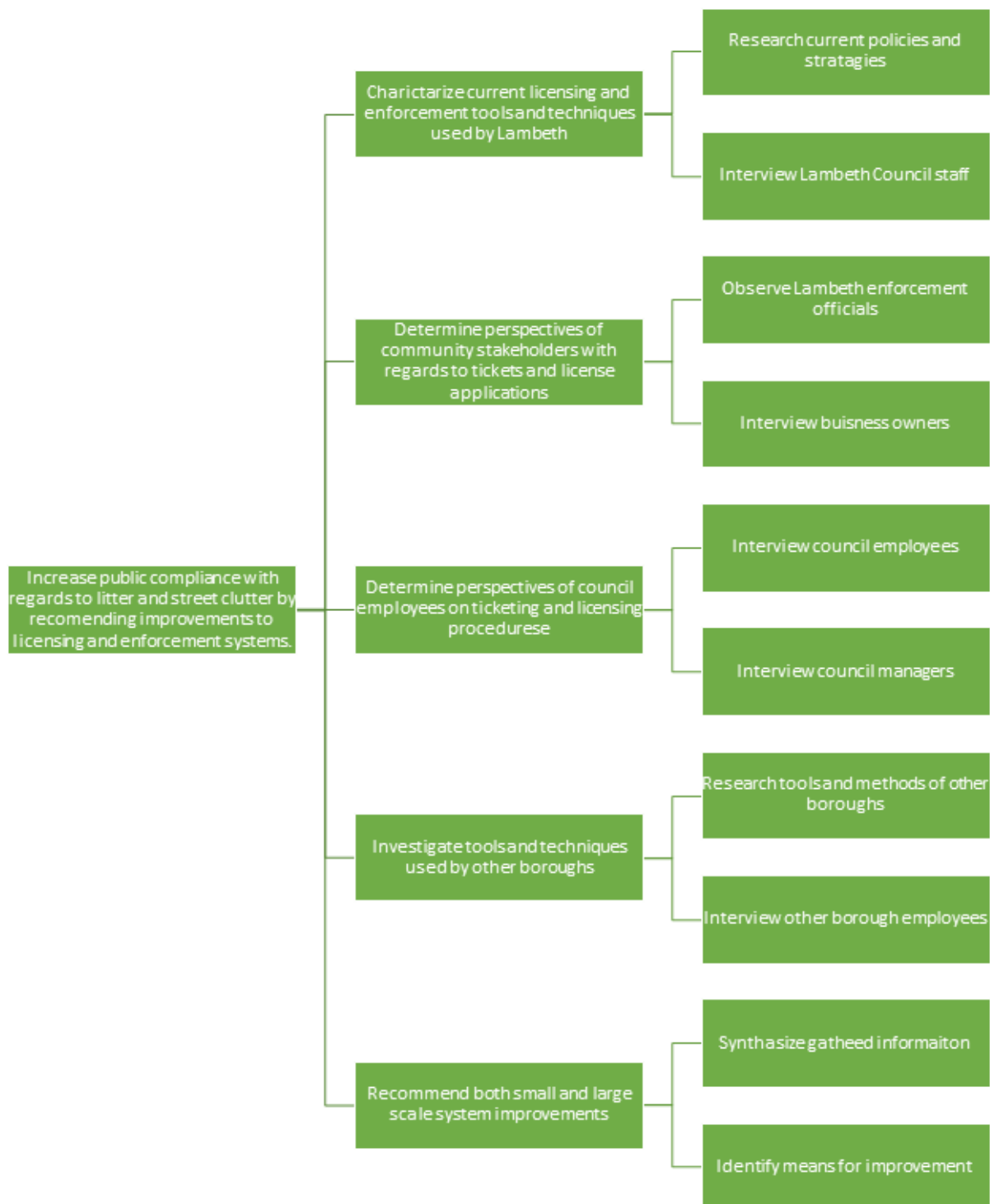


Figure 10: Goals, objectives, and tasks

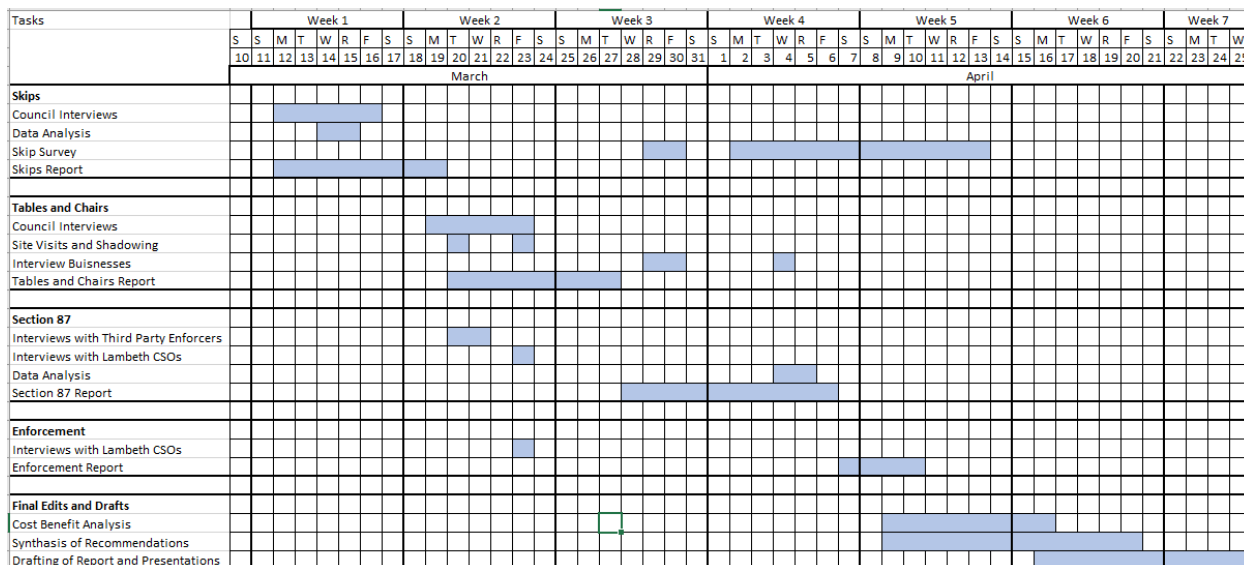


Figure 11: Objective and task schedule

3.1 Objective 1: Identify and Characterize Current Lambeth Licensing and Enforcement Tools

The first project objective the team set was to identify and characterize the current licensing and enforcement tools currently employed by Lambeth council. The team was able to identify these licensing and enforcement tools by researching current licensing and enforcement tools, studying data and reports provided by the Council, and interviewing council employees and shadowing enforcement officials within the borough. The team studied the Council’s current approach to licensing and enforcement through a review of the enabling legislation and other publicly available materials prior to the start of the project. Once the team arrived in London, they conducted further research on available council documents such as council reports analyzing the strengths and weaknesses of their current systems and spreadsheets the Council created with data such as Fixed Penalty Notices (FPNs) by ward and date. This additional research consisted of analyzing data within excel sheets pertaining to topics such as numbers and types of fines issued to skip companies. The team also researched the software systems in place at the Council in order to identify their strengths and weaknesses as well as possible improvements.

The team conducted interviews with Lambeth Council employees over the course of the project. These interviews focused on employees who worked closely with the topics of skip licenses, tables and chairs licenses, Section 87 offenses, and enforcement. The team also worked with employees who entered data and information into council database systems, Community Safety Officers (CSOs), and council managers. These employees provided detailed information on the data entry and licensing process, the ways that CSOs prioritized tasks and conducted inspections, and the Council's overall goals for the future. The team conducted these interviews face to face and were semi scripted, where the team drafted a brief list of questions to facilitate discussion. The team asked additional questions depending upon the nature of the interview and knowledge of the subject. Due to the impromptu nature of many of the interviews, not all interviews had scripts and were instead conducted as conversations. Furthermore, subjects would occasionally take the interview in an unanticipated direction, therefore limiting the use of a script. During these interviews all team members were present where one team member would facilitate most of the discussion and the other three would take notes. Although the team assigned these roles prior to the start of every interview, every team member contributed to the discussion when necessary. These interviews were with one subject at a time where the project sponsor often provided an introduction and helped facilitate pertinent discussion topics. An interview preamble was also stated to the interviewee(s), prior to discussion, to ensure consent and inform them of the reasoning behind the interview (Appendix A). The team did not record conversations in order to keep the interviewee comfortable enough to share information. The team developed interview scripts (Appendix B), when appropriate, and consulted with the faculty advisors and project sponsor to ensure they correctly met the project's needs. These interviews helped to fulfill both objective one and three, by identifying the ways in which the current licensing and enforcement systems work, and by gathering the opinions of the staff regarding the efficiency and effectiveness of these systems.

3.2 Objective 2: Determine the Perspectives of the Lambeth Community Stakeholders Regarding the Ticket Issuing and License Application Processes

3.2.1 Skip Company Survey

The team created a survey that they distributed to all skip companies operating in Lambeth. The survey asked skip companies about their opinions on the application process, the ease of access to application related information, and possible improvements to the system. The survey encouraged skip companies interested in discussing their thoughts on the skip application process in more detail to provide an email address so that the team could contact them further.

The team received the results of the survey within two weeks of its distribution. The team contacted skip companies who offered an email address in order to provide additional feedback on the licensing process or ask additional questions about the team's project. These team then used these survey results to identify any new problems and create any new recommendations for the skip licensing process.

3.2.2 TAC Business Interviews

The team interviewed local Lambeth business owners who applied for TAC licenses in order to gain their perspective on the application process. A Lambeth employee identified businesses that the team could interview and introduced the team prior to the interview. The team stated an interview preamble to the interviewee prior to the interview to gain consent and inform them to the reasoning of the interview. The team also created interview questions (Appendix D) as guidelines to gain information on business owners' thoughts towards the TAC application process, the impact of the license on their business, and any ideas they had on how to improve the process.

The interviews were semi-structured and approximately 20 minutes long. All team members were present for these interviews: one asked questions and led the discussion, while the other three took notes and added to the discussion when necessary.

3.3 Objective 3: Determine the Perspectives of Lambeth Council Employees Regarding the Complete Ticketing and Licensing Procedures

Along with gaining a complete understanding of how the license and enforcement systems work within the Council, the team also grasped different employees' opinions on these systems. The team received answers to questions that related to whether or not the systems worked well and also what improvements to these systems could make a certain employees job more efficient. To answer these questions the team interviewed key stakeholders in Lambeth's licensing and enforcement: employees who use the Council's licensing and enforcement systems and officials in charge of enforcing those systems. The team also observed enforcement officials in the field to understand the process of on-site ticketing and other enforcement duties.

3.3.1 Interviews with Lambeth Council Employees

As previously mentioned, the team conducted interviews with Council employees in Lambeth. Questions to achieve this objective were part of the interviews outlined in objective one and followed all of the procedures listed there. First, the team used interview questions (Appendix B) to ask employees to identify the current strengths and weaknesses within the current tools and systems available to them. Then, the team asked these employees for their opinions on ways to improve those systems, what specific resources they lacked, and which systems were the most critical to improve.

3.3.2 Observations and Interviews of Enforcement Officials

The team observed enforcement officials on the job in order to understand the process of on-site ticketing and other duties of enforcement officials. The team consulted our project sponsor to identify enforcement officials that the team would be able to observe while on duty, and the team only selected officials working during regular business hours. Pairs of team members then observed together in order to corroborate observations and ensure safety. Team members met with two separate enforcement officials: one was an NSL enforcement official, and

the other was a Lambeth Council CSO. Before each official began their patrol, they discussed specific practices that the team should avoid as to not interfere with their duties. Team members only observed official interactions with the public and did not intervene in enforcement activities. The purpose of this exercise was to learn more about the activities of the enforcement official. The team only interacted with the enforcement official and never attempted to do so when it may have interfered with the official's duties. The team recorded observations on the frequency of tickets issued, the reason for the ticket, and the process by which they recorded and managed tickets.

In addition to observing enforcement officials on the job, the team interviewed a set of enforcement officials (Questions in Appendix C) based on referrals by the sponsor liaison. As with the previous interview, the group read an interview preamble to the interviewee prior to the interview to gain consent and provide a reasoning for the interview. The interviews were individual and semi-scripted, and there was one primary interviewer and one note taker.

3.4 Objective 4: Investigate Efficient Licensing and Enforcement Tools and Techniques Used by Other London Boroughs.

The borough of Lambeth is not the only borough that has problems with licensing and enforcement. The team conducted in-depth research as well as a number of interviews to compile a list of all current licensing and enforcement systems and processes used by other boroughs.

The borough of Hackney had issues with their licensing and enforcement systems and processes but decided to address these issues by implementing new software. The team reviewed this strategy that streamlined, centralized, and modernized Hackney's licensing and enforcement processes in order to identify its effectiveness and potential as part of a possible solution for Lambeth Council.

The team conducted an impromptu interview with a Hackney employee regarding their new software, known as Liberator, and the third-party contractor that provides the borough with this software, known as Farthest Gate. This interview allowed the team to gain insights into how this software works, as well as how it fixed the issues that Hackney faced regarding their

previous licensing and enforcement systems and processes. All four team members were present for this discussion and demonstration which lasted an hour. Two team members took notes while the other two team members led the discussion.

The team also conducted an interview with two employees from the borough of Tower Hamlets Council in order to learn more about their TAC license application process. The team gained information regarding the enforcement of these licenses as well. The team reviewed this borough council's TAC license process in order to identify its effectiveness and potential as part of a possible solution for Lambeth Council. All team members were present for this discussion, which lasted for thirty minutes. Two team members led the discussion with the Tower Hamlets Council employees while the other two team members took notes.

Our sponsor has also been in contact with some other borough councils in order to compile a list of all current licensing and enforcement systems and processes. The team analyzed this list and identified the borough of Brent's third-party environmental enforcement contractor Kingdom Services Group as a suitable option for enforcement. The team researched this company's website to further understand their strengths and weaknesses and to identify its effectiveness and potential as part of a possible solution for Lambeth Council.

3.5 Objective 5: Recommend Both Small-Scale and Large-Scale System Improvements to Increase Public Compliance and Utilize Borough Resources

After the team completed their research, interviews, and observations they compiled all necessary data that they had gathered over the course of the project. Interviews with Lambeth council employees, enforcement officials, and local business owners assisted the team in identifying specific problems within Lambeth's current licensing and enforcement systems, while interviews from other boroughs assisted in identifying effective tools that the Council could use to improve those systems. Many of the problems that the team identified would take a great deal of time and money to resolve, while other problems would not require as much of the Council's resources. In order to address every identified problem, the team recommended both small-scale short term improvements as well as large-scale long term improvements for the

Council. The short term recommendations allowed the Council to adapt their current systems to resolve smaller issues without devoting an immense amount of resources, while the long term improvements, in an ideal situation, would reconstruct the current licensing and enforcement systems the Council uses.

4 Problems and Recommendations

This section details every problem that the team discovered within Lambeth Council's current licensing and enforcement systems and processes. For every identified problem, the team suggested a recommendation to resolve the problem. Every problem and its recommendation has a corresponding section. The team grouped these sections together based upon whether they were a short term resolution or a long term resolution for the Council. Many of our recommendations suggest new software features that could benefit the council, so we conclude with an aggregated list of all of these software system features.

4.1 Short Term Recommendations

Each subsection within this section discusses a problem with the Council's licensing and enforcement systems. For every identified problem, the team has suggested a short term recommendation to solve it. Short term recommendations include minor changes to Council practices, policies, and web content. These recommendations will require a relatively small allocation of the Council's resources to implement.

4.1.1 Improve Skip Application Submission Process

Submitting a skip license application via the Gov.uk website requires applicants to pay for their license fully prior to submission. The application fee section of the skip application is blank and requires the applicant to input the correct fee for their specific application; however, applicants frequently input the wrong value and either underpay or overpay. Refunding applications if applicants overpay can take up to four weeks because the payment goes through a separate system used by Gov.uk. This four week process requires a significant commitment of council resources towards a problem that does not occur with the other two application methods, email and mail, because the other two methods go through Lambeth Council's payment system.

The Council often issues licenses to skip companies who fail to apply for a parking suspension five to seven days prior to submitting their skip application. The Council issues these licenses because these companies apply through the Gov.uk website and the Council cannot commit resources to refunding the application fee. Applicants actively use the Gov.uk website to

bypass Lambeth's regulations. The payments that are made through the Gov.uk website also do not go to Lambeth Council. The council has requested to know where these payments have been going but have received no information yet (Kemi Adelaja Skip Application, 2018).

Although email is one of the main ways Lambeth receives skip applications, a new applicant looking online might find the application very difficult to find using this method. The Lambeth website does not intuitively direct users to the Lambeth form. As one can see in Figure 12, there are many ways the Council website can direct a user to the Gov.uk website or to web pages that no longer exist. The process for successfully finding the form through the website requires the user to scroll to the bottom of multiple pages and find a download link in a list containing nine other links. It took over ten minutes for a new user to find the Lambeth form through the Lambeth website in a team-conducted trial.

Yellow path: directed to Gov.uk **Green path:** directed to Lambeth form **Red path:** directed to broken webpage

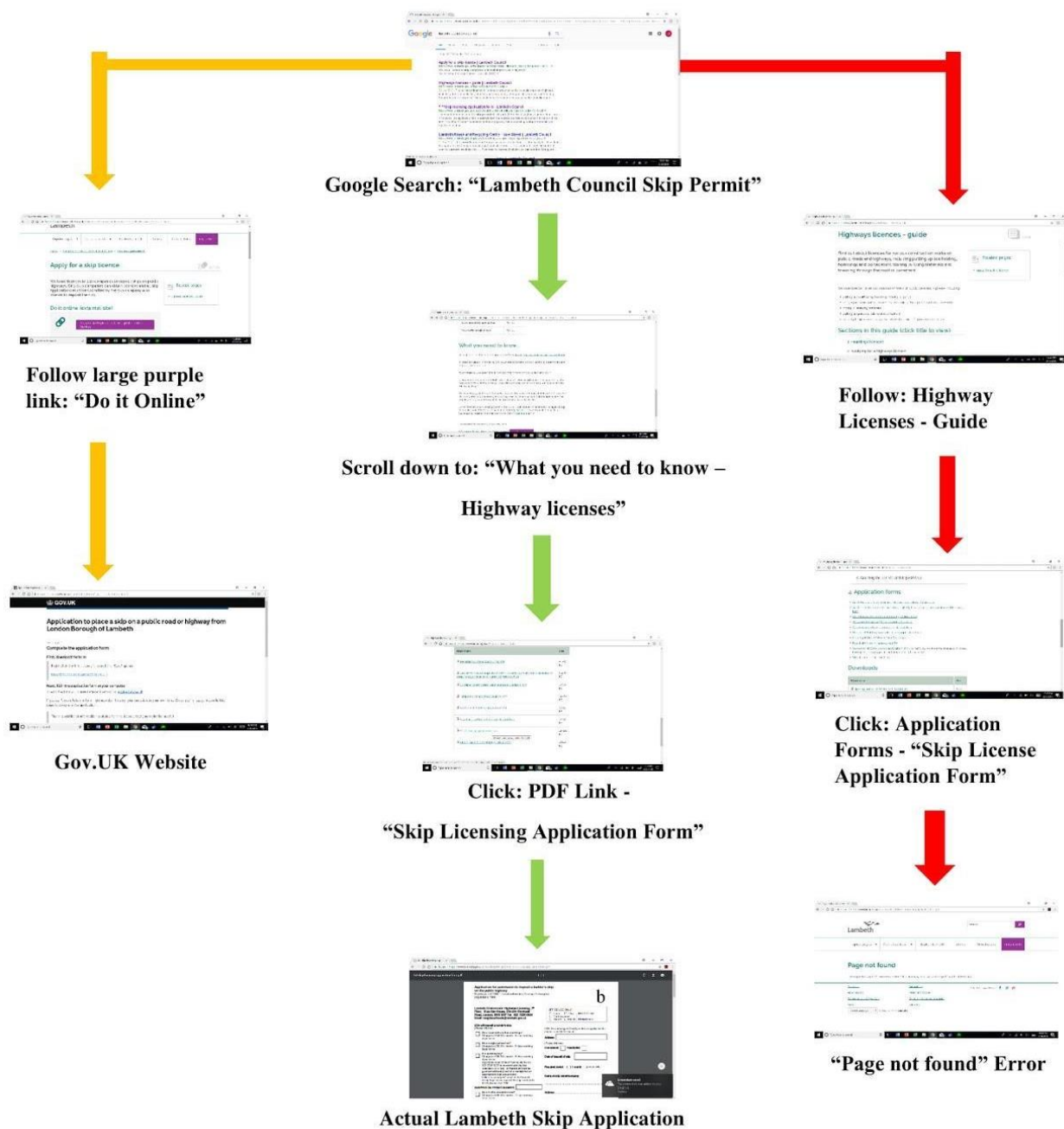


Figure 12: Different routes to take in order to reach skip license application

In order to prevent these aforementioned issues with the skip application process, the Council must disallow skip companies from applying for licenses through the Gov.uk site. To

prevent these issues from occurring, the Council should remove the link to the Gov.uk site on the Lambeth website and work with Gov.uk to have their website direct users to the Lambeth application. The Council's IT team could easily remove the Gov.uk link on the Lambeth website but redirecting the Gov.uk site to Lambeth may require significantly more work because it is not under the control of the Council. By preventing Gov.uk applications, the Council will prevent customers from incorrectly paying, saving the time of both applicants and council employees, prevent companies from bypassing Lambeth Council's application regulations, and receive the application fees that were previously missing (Adelaja, K. Skip Application, 2018).

The results of the team's skip survey (Appendix L) also show that skip companies that work with Lambeth Council, work with a number of other boroughs who do not use the Gov.uk website for license applications. If Lambeth Council removed the option to apply through the Gov.uk website, they would create better consistency between London boroughs' skip license applications and therefore improve the overall customer experience.

Although the Gov.uk website seems problematic for the council, it does have some advantages when compared to the Lambeth Council website process. Unlike the Lambeth application process, the Gov.uk website clearly directs applicants step by step on how to fill out and submit a skip license application. The Gov.uk website also provides links that redirect the applicant back to the Council's own website to provide them with the necessary information on skip licenses if they need it. Although Gov.uk payment methods cause various problems, they are completely safe and secure. Currently the other two methods of applications, email and mail, require the customer to write their credit card information on the form itself, which is a significant breach of customer privacy as it is not only sent over email but also viewed by multiple groups in the Council (Jacqui Council, 2018).

Lambeth Council is currently drafting a new application form which will no longer ask the customer for payment information. Instead, when the Council is ready to approve an application they will send a confirmation email with a payment link to the applicant and only accept the application after the payment has been made. This method of payment is a significant improvement over both the Gov.uk process and the current Lambeth form process because it does not allow preemptive payment nor compromise the customer's payment information.

Throughout the Lambeth skip application process, neither the skip page nor the guide page, as one can see in Figure 12, mention that an applicant can download, complete, and email a

Lambeth form to the correct email address: environment@lambeth.gov.uk. Text near the end of the application informs the applicant to email it to neighborhoods@lambeth.gov.uk, which is an incorrect email address. If an application is sent to this email address, the correct council employee will not receive it, and therefore it will not be approved. This process will diminish the customer experience, because the applicant will have to apply again.

In order to fix issues with customers sending their applications to the wrong email address, the skip application has to clearly label the correct submission email address. The skip application should also clearly state that a proper PDF editing software, such as Adobe Reader, is necessary in order for the customer to edit the application. The Council could easily implement these changes for little to no cost.

Overall, Lambeth Council would benefit from these changes because they would no longer have to deal with the difficulties of the Gov.uk site or the difficulties of incorrect submissions. Additionally, the skip companies would only have access to the Lambeth skip license application making their experience much simpler. If all applicants submit their applications through Lambeth Council's website, then the Council would receive all the revenue from all the applications rather than receiving no revenue from applications submitted via the Gov.uk website. New skip companies coming to Lambeth from other boroughs are also unlikely to find the removal of the Gov.uk site as an inconvenience as only two of the neighboring boroughs accept applications from the Gov.uk site.

Alternatively, the council could replace their PDF application with a web page application. Currently we believe that a PDF form of the license application is fit for use for the Council, but if the Council is updating their licensing system on a large scale they should improve the application process alongside it.

Lambeth could use a webpage for skip applications rather than a PDF submission. Using a webpage for the application process instead of a fillable PDF has many small advantages. First, it prevents applicants from entering clearly incorrect information. For example, if an applicant entered an address for a skip that was not in Lambeth, the website could prevent them from submitting the application. Currently, applicants must have the proper PDF editing software, such as Adobe Reader, installed on their computer to fill out the PDF form. If the Council got rid of the need for this PDF editing software throughout the skip application process, it could significantly improve the customer experience. Finally, a website application could automatically

submit information to the licensing storage system after the application has been approved by the council. This automated process would remove the need for the correspondence team to redirect emails to the correct employees and remove the need for employees to spend several minutes manually entering information.

If Lambeth Council used a webpage to apply for a license, the Council could also implement a skip company account system. Applicants could enter basic information such as company owner, address, postcode, and telephone number as part of a user account, or the initial license application could save all of the applicant's information into a user account. Either of these processes would eliminate the need to include redundant information for every application. This account system would significantly reduce the amount of time required to apply for a license and limit the chance of incorrect information being entered.

4.1.2 Highlight Lights and Marks License Regulation

Approximately 53% of all fixed penalty notices (FPNs) that CSOs issue to skip companies are due to the lights and marks violation (Fawcett Organizing, 2018). This skip requirement is in a region of the application that does not require any data entry, so the applicant could easily overlook this requirement when they are applying for a license. The team believes that the lack of knowledge about this regulation could be the main reason why the Council issues so many FPNs for this offense (Gayle Skip License, 2018). In order to resolve this issue, the team recommends that the skip application form display the lights and marks requirement more prominently (Fawcett Organizing, 2018). If the form emphasized this requirement by creating either a section specifically for it on the skip application or a warning on Lambeth's website, there would be fewer instances of this violation and therefore better public compliance regarding skip regulations. The team believes that this recommendation would also greatly improve the customer experience, as customers would no longer be receiving FPNs for a violation that they were unaware of.

Although we believe that highlighting the no lights and marks regulation on the skip application would reduce the number of instances that this violation occurs, the team's skip survey results (Appendix L) show that all four skip companies that responded were aware of the regulation that they violated. If companies are completely aware of the no light and marks

regulation and are still violating it, an alternative approach that the Council could take to reduce the number of these violations would be to increase the fines for them.

4.1.3 Inform Applicants of Road Restrictions

As we previously mentioned, some of the roads in Lambeth are not under the jurisdiction of the borough with regards to skip placement. These roads, which Lambeth does not have jurisdiction over, are under the control of TfL (Adelaja, 2018). Approximately two skip applications each month are wrongly sent to the Council, who then have to relay them to a TfL engineer for approval (Adelaja, 2018). This process wastes both the time of the Council employees who must redirect these forms and the applicants who must wait longer for their application approval.

There are also other roads within the borough known as traffic sensitive roads. When a skip company applies for a skip license on a traffic sensitive road, the application fee increases from £44 to £60. The results from the team's skip survey (Appendix L) show that skip companies are usually unaware of which roads are traffic sensitive and have to email a Council employee before they apply. This process wastes both the time of the Council employee who must inform the skip companies of these traffic sensitive roads and the applicants who must wait to apply for a license once the Council has informed them.

To resolve these issues, the Council could clearly state which roads are under the control of TfL and which roads are traffic sensitive on the application itself. The Council could also potentially provide a map detailing the locations of these roads, such as the map that one can see in Figure 13. If the Council informed applicants of these roads, they would prevent confusion for both the customer and the Council employees and therefore improve the customer experience, preventing delays for the application's approval, and limit the expenditure of council time. This change would be relatively low cost as it would only require the editing of the online application page.

If the council used a webpage for skip applications, they could prevent applicants from entering an address on a street that TfL controls. The webpage could provide a link directly to TfL application to expedite the customer journey. This link would prevent the need for a Council employee to forward the application to a TfL engineer. This webpage could also inform

will miss a skip violating the terms of its license. The team believes that inspecting a skip within a few days of its initial placement is ideal for the Council, as it would easily identify very common violations such as no lights or marks.

Although the Council encourages CSOs to inspect skips more than once, they tend not to do so. CSOs have many different responsibilities and they prioritize each of these responsibilities daily (Appendix G). Depending on these daily tasks, skip inspections are usually low priority and therefore CSOs do not inspect them often. If the Council wants to significantly improve skip license compliance, they need to inspect skips earlier and more frequently. It might be difficult for the Council to implement this policy however, since CSOs will have difficulties devoting extra time to skip inspections.

Additional inspections will be necessary to catch rare violations such as failed to remove, which would require inspections at the end of the license, and failed to reposition, which would require a follow-up inspection. However, both types of violations only have one recorded FPN each for the year of 2017 (Skips FPN Chart, 2017). A review of the current methods enforcement officials use to inspect skips is necessary in order to recognize if these violations are frequent enough for the Council to incorporate into the skip inspection policy. If the Council decides to implement a skip inspection policy, they could also contract a software development company to design a software that automatically notifies enforcement officials of which skips to inspect on a given day.

4.1.5 Create Policy Regarding an Obstructed Skip Spot

Sometimes an area that a skip company has recently obtained a skip license for will not be available, often due to a parked car, when they arrive to place the skip. According to the results of the team's skip survey (Appendix L), 75% of respondents have encountered an obstructed skip spot at the time that they plan on placing the skip. Currently, the Council does not have a written procedure for skip companies to follow in the event that a car obstructs a skip's spot.

The team recommends that if something is obstructing the skip location, then the company can place their skip within 10 meters of the original location on the same street in a reasonable area. If a company places a skip in a different location however, they must immediately e-mail or call Lambeth Council and provide the new location for the skip. By

immediately informing the Council of the skip's new location, a council employee can update the skip's location on the license so that a CSO will not issue an FPN for "breach conditions." This policy would improve a skip company's overall experience as it would save them the time and effort wasted by calling a Council employee and having them decide the skip's new location.

4.1.6 Automatically Calculate TAC License Application Fees

As previously mentioned, over 50% of applicants provide the wrong payment due to the complicated process of having to calculate the application fee themselves (Williams, 2018). Local businesses with TAC licenses (Appendix M) noted that the payment calculation was very complicated, and they had at least once entered the wrong payment information and needed to resolve it with the council. Significant time must be spent contacting businesses to both refund and receive payments for incorrectly paid applications. Furthermore, requesting payments from businesses who underpaid can anger business owners and diminish their customer experience. Another problem associated with the payment process is that a Council employee must manually calculate the application fee to verify that the payment the customer has sent along with their application is correct. This process adds significant time to the application verification process and allows for human error. If the employee makes a mistake calculating the cost, the application process takes even longer (Williams, 2018).

A solution to avoid these problems would be to include a feature in the online TAC application that automatically calculates the cost of the license based on input information pertaining to number of tables and chairs and range of time they will be out on the highway. Interviewed businesses believe that this recommendation would significantly improve the quality of the application process.

If having that feature as part of the website is not feasible, the Council should consider a second option to avoid these problems. A customer could submit their application to the council without payment, and then once the Council approves it, they could send the applicant an electronic bill with the correct application fee. The Council could also calculate the correct application fee using the Microsoft Excel sheet that we created by inputting the license application information on the number of tables and chairs and the time that they are outside on the highway. Tower Hamlets Council (Appendix O) uses this method to issue payment for its TAC licenses and has no problems with incorrect payment. Using this sheet would save several

minutes for each application and also minimize the possibility of human error with the calculation.

4.1.7 Reformat Online TAC Application Data

When an applicant submits an online TAC application, Uniform automatically populates an email containing the data that the applicant entered and sends it to a Lambeth employee. The format of that email is very difficult to read, as it presents all of the application data in an unformatted list. Of all of the data in that email, the time schedule for the applicant's tables and chairs is the most difficult to read. The poor formatting of this email causes application entry to take several more minutes when compared to the data entry from an application submitted via paper copy (Williams, 2018). The time that Council employees waste deciphering the poorly formatted information could be better spent focusing on a different task.

Our team recommends reformatting the email to display the information clearly. More specifically, the email currently lists the hours that tables and chairs are in use in a format of one hour per row. If the email displayed the data in the same manner as the Microsoft Excel sheet (Appendix J), a Council employee could understand this information more easily and therefore spend less time inputting it into Uniform. Ideally, if Lambeth Council had the resources, they could program their website to update its back office systems directly and remove the need for data entry altogether.

4.1.8 Eliminate the Banding System

Although banding does succeed in requiring businesses on busy streets to pay more for their TAC license, it may complicate the process more than it helps. Banding makes calculating application costs more difficult by modifying both the cost of each table and chair and the cost of each hour those tables and chairs are out on the highway. Furthermore, businesses frequently lie about their banding on their license application in an attempt to reduce the application cost. Businesses lying about which banding category they fall into, forces Lambeth employees to look up the address for every application and determine its banding manually, which wastes time during the application approval process. Charging applicants based on banding might also not be compatible with Lambeth's initiative to charge an applicant only enough to recover costs. The cost to approve and consult a license for a business operating in band A would most likely be the

same as the costs for approving and consulting an application in either band B or C. If Lambeth Council is only charging businesses enough to recover the costs of the approval process, then the Council should not charge businesses in different bandings different costs.

An easy solution to preventing applicants from lying on their applications, as well as saving council employees time from checking bandings of the addresses on these applications, would be for the Council to eliminate the banding system altogether. By eliminating this system, there would still be set rates for the number of TAC and time spent out on the highway, but the base fee for TAC licenses would be equivalent for any applicant. Tower Hamlets Council (Appendix O) decided against using banding in their TAC licenses because they believed it would add too much extra administration to their application process. Keeping this base fee equal would simplify calculations for both the applicant and the council employee therefore saving resources and improving the overall customer experience.

4.1.9 Re-Consult TAC Licenses

Although a CSO inspects every business when they first apply for a TAC license, no policy requires scheduled follow-up consultations. Many businesses with TAC licenses could be in violation of their license, and the Council would not become aware of it unless a citizen files a complaint against said businesses. There are two primary ways businesses can be in violation of their license. First, businesses may have altered the way they place their table and chairs without updating their applications. Second, TfL or Lambeth Highways may have added obstructions to the walkway outside businesses which could alter the business's impact on the street and violate their license. Previously, businesses would only be re-consulted if they were part of a community complaint that a CSO had seen.

In order to prevent businesses from violating their license due to highway additions, our team recommends that a consultation visit be made whenever TfL or Lambeth Highways makes a change to any highway outside of a license holding business. One way to obtain a list of highway changes planned by TfL and Lambeth Highways would be to request their annual construction budget. By referring to the times of each scheduled construction, the Council could create a schedule for re-inspections to assign to CSOs (Virtue, Legislature, 2018).

In order to prevent businesses from violating their license by altering their storefront without updating their license, CSOs should perform re-consultations of every license every few

years. As the Council has approved most of Lambeth's businesses for TAC licenses, CSOs completed most initial consultations and the importance of re-consultations is substantial. Tower Hamlets Council (Appendix O) reconsults its license holders every few years in order to ensure they are still in compliance. Though reconsultations have not yet begun in Lambeth, the Council has a new initiative to schedule re-consultations for TAC licenses every few years in order to make sure businesses are complying with their licenses (Virtue, Legislature, 2018).

4.1.10 Standardize TAC Consultation Process

When a CSO makes a consultation visit to a business applying for a TAC license, there are many factors that they have to take into account before making the correct judgement call to approve or deny it. These factors involve things such as how far the TACs are from the street, how far they are from the business's property, whether or not the area would make a good community space, if the license will create a possibility for more public disturbances, and if the business has a protocol for dispersing large crowds. Although CSOs have experience with these measures and can easily identify them when making a consultation, there is no set checklist for them to consider and review. Some officials may feel they do not need a checklist to follow while making a consultation; however, it could still be useful as a guideline for them. Creating this checklist could make CSOs' decisions to approve a license for a business much simpler and more objective therefore minimizing potential error. This checklist could also be shown to the public and referred to in policy with the overall goal of ensuring consistency. The team has created an example CSO guideline checklist that the Council could use as a reference for formal CSO guidelines in the future (Appendix P).

4.1.11 Implement Quarterly TAC Licenses

Local business owners holding TAC licenses (Appendix M) had negative opinions towards yearly TAC licenses because they only have TAC outside for several months during the summer. Other borough councils such as Tower Hamlets (Appendix O) offer six month TAC licenses. Six month licenses allow local businesses to save money by paying for tables and chairs only when the business uses them. Based upon feedback from local businesses, a Lambeth CSO, and Tower Hamlets Council the group recommends that Lambeth Council should implement either a six month or ideally a quarterly TAC license. This recommendation would significantly

improve businesses' opinions of the license as they would only be paying for tables and chairs during the season in which they are actually being used. However, this quarterly license would be cheaper than an annual license. Alternatively, if the Council implemented this quarterly TAC license system, it would increase the amount of administration necessary to maintain it because it is possible that businesses would apply for more than one quarterly license a year. Additionally, the Council could collect less revenue from TAC licenses if businesses only paid for one or two quarters a year.

4.1.12 Automatically Email FPN Payment Information

When issued an FPN in Lambeth by either an NSL official or a Lambeth CSO, one must use the reference number on the ticket and go online or call the Council directly to pay the accompanying fine. However, if the offender loses their physical carbon copy ticket, they will be unable to pay their fine. In order for the offender to get the reference number for their lost ticket to pay for their fine, they must contact the Council and provide their name and the date of the incident. This carbon copy ticket system has two major problems. Firstly, if an offender loses their ticket they may either decide that it is too much work to contact the Council to get their information or they will not know how to retrieve their lost information. Either of these instances will result in the offender not paying for their FPN and not complying with the law. Secondly, offenders who for some reason did not pay their FPN can use the excuse that they lost their ticket and did not know how to pay it without the ticket in the event that the council takes them to court which could introduce a loophole into the case.

These problems could be easily eliminated by providing an electronic copy of the ticket via email to the offender in addition to the paper copy. The CSO or NSL employee could issue an email version of the FPN remotely if Uniform automatically generated the email once they recorded all of the offender's information. If the Council were to implement this technology it would make the ticket reference number easily available to the offender in the case that they lost their ticket and would make the experience as easy as possible, making the offender more likely to comply. This new technology would also eliminate the validity of the excuse that the offender did not know how to recover their ticket information removing the legal issue as well.

The implementation of this recommendation would be largely beneficial to all parties involved; however, there again are some potential drawbacks. The offender may not be willing to

give out an email address and the Council would therefore likely have to collect email addresses on a voluntary basis rather than it being mandatory. Additionally, this solution would likely lead to a reduction in the fines escalating as a result of them not being paid which could lead to some lost revenue. However, the Council would likely recover this revenue shortage by the additional number of FPNs being paid and Council employees not having to waste office time by looking up reference numbers. The group believes that this recommendation would address these problems in a reasonable manner.

4.1.13 Redistribute Enforcement Officials throughout Lambeth

NSL is the third-party contractor hired by Lambeth Council to enforce Section 87 offenses. They issue approximately 85% of all Section 87 related FPNs within Lambeth as seen in Figure 6. NSL enforcement officials issue 40% of all FPNs at the Underground stations (Figure 7) located within the wards of Bishops, Coldharbour, and Oval. Tube stations have become hotspots for littering offenses because of the number of people walking in and out of them each day. NSL officials are prioritizing these locations over others within the borough and are spending the majority of their time there. NSL is able to prioritize these locations because they determine their own enforcement officials' routes.

One of the primary goals of the Council is to improve the quality of public spaces. Although committing significant enforcement resources to underground stations will reduce the amount of litter there, the borough may not be enforcing littering in other key public spaces such as parks and plazas. Furthermore, the public may have higher expectations for spaces such as parks to be litter free than underground stations.

We recommend that enforcement officials patrol public spaces such as parks and plazas much more frequently for Section 87 offenses in order to keep a larger majority of the borough clean and safe. Redistributing enforcement officials to more significant public spaces to enforce Section 87 could improve opinion of the public space without having to commit more of the Council's resources. The Council could work with NSL to change some of the enforcement officials' patrol routes in order to increase the enforcement of parks and other key public spaces.

Although the NSL hotspots may cause other public spaces to go unenforced, they allow NSL to issue the greatest number of FPNs possible with the enforcement resources it has. If the

Council wishes to maximize the number of FPNs issued, then they should allow NSL officials to prioritize Underground stations.

4.1.14 Notify NSL Regarding Paid FPNs Immediately

After an official issues an FPN, the offender has 14 days to pay their fine. If the offender does not pay within that time period, NSL will increase their fine and mail them a warning. The offender then must pay the fine to the Council. If the Council does not quickly communicate with NSL once an offender pays for an FPN, then there is a possibility that NSL sends the offender a notice of an escalation for an FPN that has already been paid for. When this lack of communication occurs, it causes confusion and anger for the offender as well as worsens their experience with the Council. It also wastes the Council's time as they then have to deal with the complaints made by the offender as well as resolving the FPN with NSL. Though this occurrence is rare, it can significantly harm the customer experience.

There are various ways to prevent this communication error from occurring. If NSL had a login for Lambeth's FPN payment website, they could directly check the payment status of an FPN before sending an escalation letter. Alternatively, the website could automatically notify NSL when an offender pays one of their FPNs by sending an automatically generated email.

4.1.15 Change CSO FPN Quotas from Monthly to Biweekly

In order to ensure that CSOs are adequately enforcing the wards under their control, Lambeth issues them a monthly quota of FPNs that they are expected to issue. CSOs therefore tend to spend the first few weeks of every month enforcing violations such as skips and Section 87 to try to issue as many FPNs as possible to meet this quota quickly. In the second half of the month they then focus on other aspects of enforcement such as community complaints and assisting the police with other larger investigations. This approach has a number of benefits and drawbacks. On one hand it does ensure that CSOs perform a wide variety of tasks and in a way forces them to split up their time between issuing FPNs and addressing other areas such as public complaints. However, it also means that for the second half of the month FPN issuance becomes very low on the list of CSO priorities. This low priority could potentially decrease enforcement and public compliance during the second half of the month, which goes against the Council's goal of increasing compliance in general.

The Council could remedy these issues by replacing the monthly quota system with a more frequent system where the Council expects enforcement officials to issue fewer FPNs. For instance, the Council could have a two week timeline for the CSOs' quota where they are only expected to issue half as many FPNs in the same timeframe. This shorter time period would prevent large gaps in FPN issuance. Additionally, there would be more uniformity between CSOs' schedules as a result of the two-week interval. The two-week intervals would allow the Council to regulate their CSOs more closely. However, the shorter time period could introduce further complications which could outweigh its benefits. Cutting the amount of time enforcement officials have to fill their quotas could create more work for office administrators as they would have to check for FPN quotas more frequently, but adequate software systems could automate this process.

4.2 Long Term Recommendations

Each subsection within this section discusses a problem with the Council's licensing and enforcement systems. For every identified problem, the team has suggested a long term recommendation to solve it. Long term recommendations include creating new software systems, collaborating with other parties to increase public compliance, and utilizing council data to decrease administration. These recommendations will require a large allocation of the Council's resources to implement.

4.2.1 Use Software to Reduce FPN Administration Time

Currently the issuance of a single FPN costs the Council significant time to process completely. Enforcement officials must return to the office each day and spend roughly ten minutes entering data for each FPN that they issued. After an employee enters an FPN into Uniform, it becomes the enforcement official's responsibility to follow up on the FPN and determine increases in the fine if the offender does not pay it promptly. Furthermore, when an offender pays an FPN, another employee must note that on the respective FPN file in Uniform. The Council issues hundreds of FPNs monthly, so removing some of these long administrative steps could save enforcement officials a significant amount of time. Enforcement officials should spend little time dealing with administrative processes so that they can focus their resources

more on enforcement. The Council already recognizes that it is a high priority to remove all administrative processes from the FPN procedure beyond the initial issuance of the ticket by the enforcement official. In order to save council employees time and help the Council achieve its objectives, the team recommends various software systems to automate most of these administrative processes.

When an official issues an FPN, they should use a phone, tablet or other mobile device to remotely enter the information into Uniform. This remote data entry removes the need for the official to return to the office early to enter each FPN into Uniform, which allows them to spend more time on patrol. Currently enforcement officials have access to tablets that interact with Uniform remotely, but Uniform does not have a good mobile interface, so enforcement officials do not use them. If purchasing an entirely new software system that allowed for remote FPN entry was not feasible, the council could instead consider hiring a company to create a mobile interface for Uniform.

Manually updating FPN payment status within Uniform wastes employee time. When an offender pays for an FPN through Lambeth Council's website, Uniform should be automatically updated. Though the Council could purchase a new software system to achieve this goal, it may be more cost efficient to interface the Lambeth Council website with Uniform to have it automatically update when offenders pay their FPNs.

Uniform should automatically send emails to offenders when the Council decides to escalate their FPNs. The Council should also send an additional warning email a few days before an FPN escalates explaining when the escalation will occur and the consequences of it. The Council should consider the negative impact that sending many emails in short period of time has on the offender's experience. Finally, if the offender has still not paid for their FPN after an escalation, Uniform should automatically notify an enforcement official to decide how to enforce it. Uniform already has the capability to automatically generate the text of emails from its data, so adding a feature to automatically send certain emails should be feasible.

Although many small additions could be made to Uniform in order to achieve an administrative-free FPN process, the Liberator software system can solve all of these problems as well. Hackney previously had a similar FPN process to Lambeth's current one, and chose to implement the Liberator software in order to drastically reduce the administration involved with each FPN. Liberator also offers a variety of other benefits for FPN issuance, such as automatic

incident report generation. The Council should consider how they approach reducing the administration of FPNs based on the resources currently available. Many of these recommendations to reduce the administration of FPNs could cost a significant amount, but they will save council employees time and improve the offender's experience by allowing them to easily pay for their ticket.

4.2.2 Place Ashtrays Outside of Tube Stations

Currently officials issue the highest concentration of FPNs outside of the Waterloo, Vauxhall, and Brixton Underground stations. The FPNs issued at these three locations are 40% of the total FPNs issued in the past 18 months (Appendix N). Figure 2 portrays this FPN data by location. Most of all FPNs are issued for littered cigarette butts (Vialy, 2018). NSL enforcement officials spend significant time outside of stations where people are frequently smoking before entering or exiting the Underground station. During site visits that the group conducted, they noted that there were no cigarette ashtrays within the station or directly outside of it, preventing individuals from easily disposing of cigarettes. Therefore, the group recommends that the council work with TfL to install ashtrays to these areas.

The team believes that if the Council installs ashtrays people would be less inclined to litter as they would have an easily accessible and legal way to dispose of their cigarettes. Ashtrays would lead to greater compliance with the law and a cleaner public space. This recommendation would be relatively low cost; however, there are some potential drawbacks. The installation of these facilities is not a simple process as the highway directly outside of the stations is under the jurisdiction of TfL authority. While the Council currently has a working relationship with them, they are hesitant to install these features as they would believe that it would detract from the aesthetics of the station as the highway outside the station is frequently cleaned anyway (Brown, 2018). In order for the Council to implement this recommendation, TfL and the Council will need to make an agreement to install these facilities that will largely be beneficial to all parties involved.

4.2.3 Utilize Uniform Data More Efficiently

Currently, the Council stores significant amounts of data within the Uniform system that could provide numerous insights towards the improvement of the TAC license application

process (Virtue, 2018). However, Council employees are not aware that they have access to all of this data. For example, when an employee is reviewing a business's TAC license application, they rarely use Uniform to review the business's FPN history (Williams, 2018). If a business applies for a TAC license but has a history of causing public complaints or a history of anti-social behavior issues, the Council should reject or reevaluate these applications. There are likely many other back office processes that the Council could improve through the retrieval of relevant information and data within Uniform.

The team suggests that employees use Uniform to look at a business's FPN and ASB history before approving their TAC license (Virtue Legislature, 2018). If the Council rejects a license due to poor business behavior before the consultation process even began, it would save CSOs valuable time by conducting fewer consultations. This recommendation would allow CSOs to focus their energy on more important tasks.

Additionally, the Council could use the data within Uniform to generate a priority based list of tasks for CSOs to follow. This list would be beneficial as it would standardize the ways that different CSOs view priority and it could optimize their patrol routes according to geographic location which would allow them to more efficiently spend their time on patrol. This list ideally would weigh factors such as what skips have recently expired, what skips have just been placed, what TAC licenses have just been issued, and community complaints.

The data contained in Uniform can also help visualize the areas in which certain FPNs are more frequently issued. The team recommends that the Council makes heat maps to show which areas within the borough of Lambeth have had FPNs issued more frequently for skips as well as Section 87 offenses such as littering. Having these visual representations of locations and frequency of previous offenses will help Enforcement Officials more effectively plan their routes when going into the field each day. The heat map for skip FPNs could focus on unlicensed skip offenses and would show enforcement officials if there are any specific roads where skip companies are consistently disregarding the regulations set out by Lambeth Council which would allow them to plan their daily routes more effectively. This skip heat map can also contain a number of different filters for different FPNs that relate to skips in order to show if different FPNs are more prevalent in different areas of the borough. The heat map for littering FPNs would show which areas of Lambeth have the most littering offenses based on the data within Uniform. Similar to how the skip's heat map will help enforcement officials better plan their day,

a littering offense heat map would give enforcement officials more insight on where to spend their time on duty most effectively. Lambeth Council will be able to use their resources more effectively by better utilizing the data stored within Uniform.

4.2.4 Use Software to Recognize Repeat Offenders

Lambeth Council does not currently possess the resources to enforce and follow up on every unpaid Section 87 FPN. The lack of unpaid FPNs being taken to court leads to the Council missing out on a significant amount of income and decreased compliance. In the current enforcement system, there is also no protocol for deciding which FPNs to prosecute. In order to effectively use its legal resources, the Council should focus on prosecuting repeat offenders. Repeat offenders should receive harsher enforcement and prosecution measures. Repeat offenders are likely to continue committing offenses and may begin to stop paying for Section 87 FPNs once they realize they are not being fully enforced.

To solve these problems, the Uniform software could filter through all FPN data to look for businesses with repeat offenses and unpaid FPNs. Once Uniform collects and filters the data, it could output a list of the highest priority offenders that the Council should notify and subsequently take to court in order to receive payment for the outstanding FPNs.

4.2.5 Allow Enforcement Officials to Access License Data Remotely

Officials must confirm that street obstructions they encounter such as skips, scaffolding, and building materials have the proper licenses. Since enforcement officials cannot easily access back office data remotely it can be difficult to determine which obstructions on a given street the Council has licensed. If an official sees a skip while on patrol, there is no way to know if it is licensed without returning to the office and searching Symology. For each street obstruction the official must spend time taking images of the obstructions and taking notes on the location to bring back to the office in order to verify that the obstruction has a license. This process happens frequently and takes significant time.

Enforcement officials should be able to use a tablet or phone to remotely search a given street and see a list of all licensed obstruction on it. This feature alone would save officials significant time when trying to identify whether an obstruction has a license or not.

If the official finds an obstruction that does not have a license or is in violation of its license, they should be able to use a phone or tablet to remotely submit images of the violation and any notes they have. Officials should be able to remotely search for skip companies and view information on their current contact information and FPN history.

4.2.6 Maintain Existing Software

Many inefficiencies in Lambeth's back office systems stem from a lack of continual software improvement and maintenance. Rather than expanding the capabilities of software systems that the council already possesses, new software is frequently purchased. These new systems are incompatible with old systems, which limits the sharing of information in the back office and significantly slows down administrative processes (Anonymous CSO, 2018). Furthermore, employees must spend significant time learning how to use new systems efficiently.

Lambeth currently does not maintain their current software systems and they cannot meet the Council's evolving needs. One Lambeth CSO noted that his team stopped using tablets to try to access back office data remotely because the software systems (such as Uniform and Symology) did not work well on small tablet screens (Anonymous CSO, 2018). Since Lambeth's software did not require easy tablet access when it was initially purchased, it did not become a working feature once CSOs actually needed it. In general, employees who frequently use software systems can easily identify many small problems that cost the Council time and money. Many of our recommendations involve small inefficiencies in the way the Council's software works. If the council worked with its contractors over the course of several years to improve their software systems, they could use employee feedback to significantly improve back office efficiency.

Ideally, the council should create contracts with software engineering companies that allow for them to add smaller features to the software over the course of the contract. Though many contractors may only provide a fixed piece of software that they update annually, others like Farthest Gate work with the council to tailor their software to the council's needs. Working with software companies who are willing to modifying their software based on a dialogue with the council will provide software that is far more fit for the council's needs.

Additionally, we suggest that Lambeth attempts to have its back office systems use as few software systems as possible. Clearly, no current software product can accommodate every need of the council, so Lambeth cannot avoid having multiple software systems. However, Lambeth currently uses many software systems that have overlapping functionalities. For example, Uniform and Symology both store license information. The fewer software systems Lambeth uses the more resources it can commit to updating and maintaining the ones it has.

4.2.7 Use Software to Streamline Application Approval and Entry Process

Currently, all forms of applications to the council require significant time to input into the database. Email applications require the correspondence team to move emails to an environment folder, and every form of application requires an employee to re-type all fields of the application into Symology, which is a highly time-consuming process.

The Council could implement a software system to remove most steps of this process. An employee could view and accept or reject incoming applications from the Lambeth website. They could automatically enter accepted applications into the system, turn them into licenses, and email them to the customer. The rejection of an application could prompt the employee to write a short description of why the Council rejected the application, which the system would insert into a pre-generated email and send to the applicant so that they can then fix the errors and re-submit the application.

4.2.8 Compartmentalize Software System Information

Currently, employees may be able to access information that is not pertinent to their role in the system. For example, the system prompts employees tasked with approving skip licenses specifically with a list of every application from the Gov.uk website and must filter out all licenses but skips. This unnecessary sharing of information is inconvenient for the employee since they have to sort through it all to find the information they need. It is also unsafe for the Council because it allows any employee to access any information whether they have the clearance to view it or not. When they are designing a new system, considerations should be made as to who can see what information.

4.3 Implement a New Software System

Many of the team's recommendations suggest that the council employ a new software system to automate processes and ease the spread of information. Introducing a new software system would cost the Council a great deal of resources and would also require employees to spend significant time learning how to use these systems. Furthermore, creating an entirely new system that does not interact with other software systems would require employees to spend more time searching for and manually transferring data.

Although a new software system would create some issues, it would resolve many more problems than the ones created. This proposed software system combines the features of Uniform, Symology, and various Council websites creating an easy flow of information. The team believes that implementing this software system would resolve many of the Council's problems because it utilizes almost all of the software features that we have previously recommended.

If purchasing an entirely new system is not feasible, the Council should still consider these features when upgrading current systems. Here the team created a consolidated list of all features they have identified that would be useful for a new software system.

- An enforcement official should be able to use a phone or tablet to
 - issue an FPN.
 - search the system for individuals and businesses to see their basic information and enforcement record.
 - enter street address and see the nearby highways licenses.
- An enforcement official should be able to view all of his current enforcement tasks and easily identify high priority tasks.
- When an enforcement official issues an FPN the system should email the offender the ticket information.
- An enforcement official should be able to visualize areas where certain FPNs are frequently issued.
- When an offender pays an FPN online, it should be automatically updated in the system.
- If the council decides to escalate an offender's FPN, an automatic email should be sent.

- The system should send an additional warning email to the offender a few days before an FPN escalates explaining when the escalation will occur and the consequences of it.
- If the offender has still not paid for their FPN after an escalation, the system should automatically notify an enforcement official.
- All parties who issue and enforce FPNs (such as NSL) should have access to up to date FPN information.
- All license applications should be completed online.
 - The application should warn applicants which roads are under the control of TfL.
 - The software system should automatically receive submitted application data.
- Businesses should be able to create an account that stores their basic information.
- Council employees should only need to approve or modify applications, not re-enter them into the system.
- The TAC application website should automatically calculate TAC application prices.
- The system should restrict a user's access to information based on their account credentials.

4.4 Cost Benefit Analysis

We have conducted a cost benefit analysis on recommendations that involved either direct monetary costs or ways that the Council could save quantifiably amounts of money by implementing our recommendations.

4.4.1 Improve Skip Application Submission Process

Preventing skip license applicants from using Gov.uk would cause all of the funds from approximately 500 applications to go to Lambeth Council. Additionally, skip companies could no longer use Gov.uk to bypass getting a parking suspension. We estimate that 10% of skip applications going through gov.uk avoid paying for a parking suspension. We believe the council would gain about £32,500 annually in revenue from avoiding Gov.uk.

Requiring council employees to send skip company applicants a bill would add roughly five minutes of administration to each license, which would cost the council roughly £1220 annually.

4.4.2 Inform Applicants of Road Restrictions

Roughly 50 applicants accidentally apply to Lambeth Council instead of TfL for skips that they wish to place on TfL roads. We estimate that a council employee would have to spend one hour corresponding with skip companies to correct them. If adding a list that warns applicants which roads are under the control of TfL addresses to the Lambeth skip application prevented all of these cases, the council would save approximately £735 annually.

4.4.3 Automatically Calculate TAC License Application Fees

It takes a council employee with an approximate hourly wage of £14.71 15 minutes to verify the cost of a particular TAC license. There are approximately 100 TAC applications annually, so if that council employee used the Excel auto calculator the team created, the council could save approximately £370 annually.

4.4.4 Reformat Online TAC Application Data

It takes a council employee with an approximate hourly wage of £14.71 one extra minute to interpret the poorly formatted information on TAC application submissions. If the data was reformatted, the council could save approximately £25 per year.

4.4.5 Eliminate the Banding System

It takes a council employee with an approximate hourly wage of £14.71 five extra minutes to verify the banding of TAC applications. If the banding system was eliminated, the council could save approximately £130 pounds per year.

4.4.6 Implement Quarterly TAC Licenses

Though this recommendation would significantly improve the customer experience, it adds to the Council's administration time. An employee with an approximate hourly wage of

£14.17 would have to process roughly twice as many applications, which each take 40 minutes to complete. This recommendation would cost the council approximately £2000 per year.

4.4.7 Automatically Email FPN Payment Information

Occasionally offenders lose their Section 87 FPNs and must contact the council to get necessary ticket information to pay. We approximate that 5% of all 5200 annual Section 87 FPNs are lost and require the offender to contact the council. An employee with an hourly wage of £14.71 must handle 260 cases annually and each case takes 10 minutes. This recommendation would save the Council £650 per year.

4.4.8 Use Software to Reduce FPN Administration Time

It takes a council employee with an hourly wage of £18.22 15 extra minutes to enter FPN data into council software systems and five extra minutes to update an FPN when it is paid. About 9,000 FPNs were issued last year so implementing these recommendations would save 3000 hours of FPN administration time. 40% of all FPNs are issued and entered by CSOs, so the council will save £22000 pounds annually. Furthermore, NSL, who is responsible for the other 60% of FPNs, will save 1800 hours administering FPNs, which would allow them to devote their resources to helping Lambeth in other ways.

4.4.9 Allow Enforcement Officials to Access License Data Remotely

For each new skip a CSO inspects he must spend ten minutes taking notes on its location and violations and spend five minutes logging into Symology and comparing the back office information with his notes. If this process was done for all 920 skip FPNs last year, then this recommendation saves CSOs 230 hours annually, saving the council £4200 per year.

4.4.10 Use Software to Streamline Application Approval and Entry Process

An employee with an approximate hourly wage of £14.17 must spend 20 minutes reentering application information, for all 1100 annual applications. This recommendation would save the council £5400 per year.

5 Conclusion

The knowledge that we obtained from researching Lambeth's current licensing and enforcement systems and interviewing Council employees allowed us to identify the strengths and weaknesses of these systems. We interviewed and surveyed Lambeth businesses in order to identify strengths and weaknesses within the license application processes. Our interviews and observations of enforcement officials provided an in-depth analysis of the processes used by the Council to enforce Section 87 and license regulations as well as an understanding of how compliant the Lambeth community is currently. Our investigation of other boroughs' tools and techniques provided us with a list of effective strategies to increase public compliance that Lambeth Council could also implement. Our sponsor helped us immensely by gathering this information from other boroughs.

Through our research, interviews, surveys, and observations we have created suggestions to improve many different problems within the Council's current licensing and enforcement systems and processes in the form of both small-scale and large-scale recommendations. The Council could easily implement some of our recommendations by allocating a small amount of their resources to do so. These recommendations, such as correcting the submission email address on a skip license application or using an excel sheet to calculate the fee of a tables and chairs (TAC) license rather than calculating the fee manually, would allow the Council to adapt their systems easily in order to resolve smaller issues. However, many of our recommendations, such as creating a formal license inspection and follow up policy, would require more of the Council's resources.

The most significant issue the Council has is with its licensing and enforcement software systems. These systems' incompatibility with each other causes major issues within the Council with license and fixed penalty notice (FPN) data. For example, Symology stores all skip license data while Uniform stores all skip license violation FPN data. The incompatibility does not allow Council employees to see correlated license and FPN data, which could lead to the issuance of an undeserved license. These systems also cannot be easily accessed remotely by enforcement officials. The lack of remote access causes enforcement officials to write FPNs manually and limits their access to an offender's prior FPN history while on duty. In order to fix many of the problems with the current systems and processes, we recommend that Lambeth Council

implements an entirely new software system resembling the one described at the end of our recommendations section (4.3).

Implementing a brand new software system may take the Council a significant amount of time and money to accomplish; however, it is vital that they continue gathering the opinions and perspectives of the Lambeth community in order to further increase public compliance. Subsequent interviews with business owners and skip companies could reveal any other underlying problems with the current license application process. It is possible that the Council could easily solve some of these issues with minimal effort and therefore improve the customer experience. If a customer has a better overall experience or relationship with the Council, they will be more likely to comply with the terms of their license. We also recommend that the Council devotes more resources to interact with the Lambeth public further. If the Council sent surveys out to Lambeth residents regarding the enforcement process, they could acquire greater knowledge on the reasoning behind the lack of compliance. They could also identify possible solutions to problems through the public's feedback, such as placing more bins at local parks or placing more ashtrays throughout the borough. We hope that the Council considers our recommendations as they work to reduce anti-social behavior in the public space.

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7 Appendices

7.1 Appendix A: Interview Preamble

Prior to Interview: We are a group of students from Worcester Polytechnic Institute's (WPI) London Project Center. We are conducting this interview to learn more about the current licensing and enforcement technologies and procedures within Lambeth. This project is being done in collaboration with Lambeth Council, and we appreciate your assistance. Your participation in this interview is completely voluntary and you may withdraw from it at any time. You may refrain from answering any questions that you would prefer not to answer. By participating in this interview, you consent that any information given can be used in our research. We would like to ask for consent to quote you by your name, but if you would prefer to remain anonymous, we will keep your identity confidential. Prior to the publication of our research, you will have the right to review any quotes or information attributable to you. If interested, we would also be happy to provide you with our results at the conclusion of our research. If you have any specific follow up questions about this research, please feel free to contact us at: lambethd18@wpi.edu. You may also contact our WPI project advisors, Professor Joel Brattin and Professor Zoe Reidinger at: jjb@wpi.edu and azreidinger@wpi.edu.

7.2 Appendix B: Interview with Symology Specialist Kemi Adelaja

Interview Notes

- When a skip license is being processed and awaiting approval, the location of the skip has to be marked on a virtual map within the application itself. This virtual map seems to have no set purpose, as the employee who inputs this license data themselves was not aware of why it was necessary. Enforcement officials do have remote access to the map in case the skip is not placed in the correct location, but whether or not these enforcement officials actually use it is unknown at this time.
- Before skip applications can be viewed by a council employee that can grant approval, they are sent to an email address that does not provide access to that said employee. This means that before any skip application can be processed, a separate council employee with access to that email must transfer the application to an “environmental” folder that grants access to an employee that can approve the license.
- After a skip license has been granted and has been shipped out to a location, there are instances where say a car is parked in the spot that the skip has to be placed in. In these instances, there is no set policy on how the skip companies should advance. With no set policy, the skip company must call the council employee that approved the license and notify him/her of the problem at hand. From there, the council employee, decides where the skip can be placed, changes its location on the virtual map, and notifies the skip company.
- Some applications sent in to the council specify that the skip must be placed in an area such as a Red Route. In these instances, the placement of the skip cannot be approved by a council employee but rather a TfL engineer.
- Any skip that is longer than six yards is actually considered a container, which is not covered by a skip license. Rarely, applicants try to apply for a skip over six yards, and I have to reject them.
- Sometimes the Gov.uk website directs applicants to the wrong borough when the applicant uses a street shared by two boroughs. This is hard to solve though, because boroughs frequently make deals to exchange responsibilities of shared streets.

- Furthermore, the Gov.uk website application is six pages, but only one page is used by Lambeth to create the license.
- Generally, new companies in the borough use the Gov.uk website.
- During peak months the borough could receive around 100 skip applications.
- Usually only businesses apply for a skip license because it requires 5 million pounds of insurance.
- Lambeth requires that applicant who are placing skips in parking restricted areas apply for the parking space 5 to 7 days earlier. Currently, the lambeth application website makes sure of that, but the Gov.uk website does not, so business apply through the gov website to bypass our rules.
- Licenses for skips on roads without parking restrictions are much simpler.
- The process for refunding applications through the Gov.uk takes around four weeks.
 - Furthermore, applications from the Gov.uk site can pay any amount they choose, so applications frequently provide too little or too much money.
- Skips are usually not kept out for the whole month. The duration of the parking space suspension application is usually an indicator of how long the applicant plans on keeping the skip there.
- Every skip must have its own unique license.
- If an FPN is issued to a skip, it cannot be attached to its Symology entry.
- Enforcement officials can use a tablet to access Symology remotely.

Symology Observations

- Applications must be re-typed into Symology.
- In addition to specifying the address of the skip, Kemi had to open a map application and specify exactly where the skip would be on the street, which took around two to three minutes.
- After the license information had been typed into Symology, a license is created through a pre-formed template; however, a confirmation email to the skip company is not automatically generated. A council employee has to personally draft a confirmation email with an attachment of the approved skip license.

- When accessing the Gov.uk website, Kemi has access to all licenses, and must spend a small amount of time filtering out all but skip licenses.

7.3 Appendix C: Interview with Skip License Application Specialist Jacqui Gayle

Interview Notes

- Out of the 18 current approved skip companies, 14 of them pay their license application fees through a debit or credit card. The other 4 companies pay through an invoice, which in turn causes problems with refunds and the council's insurance safety.
- It is a good idea to submit your recommendations to your superior (in a report) as early as possible to get their feedback on which ideas are in the scope of your project.
- Iteratively create recommendations, submit reports, and alter recommendations.
- In Lambeth Council it is ideal to make reports as informative as possible by using visuals and focusing on critical information.

7.4 Appendix D: Interview with Uniform Specialist

Dulcie Williams

Our talks with Dulcie Williams and Trevor Virtue were highly informative with respect to the licensing application and approval process. However, neither of them elaborated on license enforcement or re-consultation processes.

Dulcie Williams is responsible for entering information, approving applications, and following up on incorrect payments.

- Positives
 - Most tables and chairs applications, roughly 140 out of 150 every year, are done online.
 - It is cheaper to apply online than apply via mail.
 - Uniform lets employees enter the application information without having to approve it.
 - Employees can still hold an unpaid license and/or a non-consulted license.
 - Licenses can be consulted without being paid, but licenses that did not provide images or drawings cannot be consulted.
 - Employees will wait until the license has been properly paid before approving it.
 - There are around 150 tables and chairs licenses issued annually, and only about 5 of these licenses are new applications.
 - Uniform makes it easy to renew licenses because the only some information must be re-entered.
 - If a company does not fix their application after ten days an enforcement official will be sent to the business in order to ensure they do not have tables and chairs out.
 - Emails to inform customers of incorrect payment, either overpayment or underpayment, are automatically generated and sent back to the customer immediately.
 - From there a dialogue between an employee and the applicant may arise. These dialogues can be time-consuming, and frustrate applicants though.

- Negatives
 - The entire process for a new tables and chairs license is about 21 days.
 - Once the license application is approved the sketch provided as part of the application package is not uploaded into Uniform or saved for future reference.
 - Currently applications that are only being renewed are not consulted again and are simply approved assuming that all the information is the same. However, this year all applications are being consulted again as road alterations have changed many license curb distances.
 - Despite the push to move towards an online system, Dulcie Williams finds the paper applications are significantly easier to read and enter into Uniform than the online applications. Information from online applications are sent to her in long, unformatted text.
 - Currently the cost of these applications for tables and chairs is determined by the banding of the street that they are on which is determined by the amount of foot traffic on the sidewalk, the amount of traffic on the carriageway, and the concentration of TfL roads in the area. Most businesses that apply for tables and chairs licenses are classified as band A.
 - No record of previous FPNs issued to businesses are attached to its license.
 - It can be very hard to calculate the correct payment amount for a license.
 - Over 50% of initial payments made are above or below the actual amount that is due.
 - The employee spends a significant amount of time hand-calculating each payment, which leaves a large amount of room for human error in calculating the correct licensing cost.
 - An incorrect payment causes a significant, protracted follow up process that uses up valuable council resources unnecessarily.
 - Because the new license year is far away, Dulcie is not sure what the correct fee will be by the time the year starts. This discourages her from following up on incorrectly paid licenses.

The website is not clear about whether the fee is 99 or 111 pounds leading to issues with payment.

7.5 Appendix E: Interview with NSL Administrator Anu Vialy

Interview Notes

- Paying off a ticket goes through Lambeth Council, and Lambeth Council must contact NSL to tell them a payment has been made. Rarely, this causes people who have paid for a ticket already to get an email from NSL telling them to pay an increased fine.
- NSL has an updated tablet system like Farthest Gate, they just do not implement it in Lambeth since it won't be able to interact with Uniform, and its not a part of their contract with the council.
- Tickets for littering cannot be made to homeless people as they do not have a permanent address and cannot be made if the person litters on private property.
- When an offender does not comply, police can be called by the NSL officer if it is deemed necessary, i.e. they aren't going to run away.
- Body-cams are used by officers, but are provided by a third-party contractor, meaning the data is stored in a separate database.
- Carbon-copies are used for fixed penalty notices (FPNs), at the end of the day the officer gives an employee all the FPNs info to be entered into Uniform, takes some time per ticket. The tickets are not entered into Uniform by the officer that issues them.
 - They do this to make sure that every ticket is entered properly and to ensure that officers don't "forget" to enter tickets that their friends receive.
 - Tickets will begin to be entered when an officer returns to the office. If he returns at the end of his day (at 20:00), tickets will be entered the next day.
- After 14 days of no payment, the escalation process begins and the fine increases from 50 to 80 pounds.
- Online payments can be made before the ticket is entered into the Uniform database, the payment then correlates to ticket through a specific reference number.
- Calls made regarding NSL or the tickets that a person was issued by NSL go directly through Lambeth Council.
- The council sends a final warning three days after the 14 day escalation, which states that after the 3 days, the offender will be taken to court.

- It is rare for people to lose their ticket.
 - 2 or 3 times a month
- 99% of tickets are for cigarette butts.

7.6 Appendix F: Interview Notes with Street Trading License Administrator Trevor Virtue

- Goal: To make better, safer neighborhoods in Lambeth.
 - Expansion of businesses while mitigating anti-social behavior (ASB)
 - Less ASB will happen if people are sitting nearby constantly.
 - Keep open spaces in constant use because it promotes a better community.
 - Lambeth can only charge the amount to recover costs for each process.
 - Online applications will use less of the council's resources, resulting in the applications costing less money.
- The council hopes to improve the borough as a whole through more tables and chairs licenses.
- If a business wants to use a public highway to promote sales, they are required to have a street trading license, as per the London Local Authorities Act of 1990.
- People are less likely to indulge in ASB if there is an outdoor presence invested in public realm improvement.
- The council does not want a white elephant where they build public space, resulting in the space being left empty later on.
- The council wants to try and utilize these public spaces well.
- Venn Street have a town center Clapham didn't have a town center but built in a table and chairs agreement with local businesses and became a town center with a market and a community center.
- There are two ways that an application is submitted:
 - A manual system where the application is sent in by post as well as an online application.
 - The council is pushing for the online application because it is investing and promoting small businesses as an effort to keep costs down.
- Legislature says that fees are set to recover the council's costs, so that try to minimize costs to help small businesses
- The council is attempting to minimize costs to in turn minimize fees.

7.7 Appendix G: Interview and Observation of Lambeth CSO

Street Observation

- CSOs consider many factors when making a consultation for a tables and chairs license:
 - The tables and chairs must be farther than 1.8m from the curb of the street, or the closest street obstruction (such as a bus stop).
 - The tables and chairs must be within 1.3m of the storefront.
 - The tables and chairs must not cause significant disturbance to local residencies. For example, if an applicant wishes to have tables and chairs out until midnight, it may disturb the residents living on the second floor of the business.
 - If the business serves alcohol, do they have an effective dispersal method make sure their patrons do not cause disturbances?
 - If the business has unlicensed permanent structures then we should immediately reject this application, as they are visibly in violation.
 - Will allowing this business to put out tables and chairs contribute to a community center?
- During this observation, the applicant had two large plants in boxes outside the storefront. First of all, those plant boxes used most of the businesses 1.3 meters from the storefront, so there was no clear place for him to put the tables and chairs he was applying for. Second, those plant boxes were clearly immovable. Immovable obstructions such as those plant boxes are considered structures, which the business did not have a license for. Not only will the CSO reject his license, he is going to contact the business owner and give him 24 hours to move the boxes.

Interview

- As a CSO, his overarching duty is to deal with public complaints within his assigned wards.
- There are 13 CSO assigned to 21 wards, some CSO have more than one ward.
- This CSO lists all the tasks he has to complete by priority and focuses on complete the highest priority task first.
- This CSO's team used to use tables to access back office system in the field, but they no longer use them as the back office systems (such as Contender, Academy, and the Land Registry) were very hard to view on tablet screens. Now we simply print or copy down information from back office systems before leaving the office. Uniform requires secure network to be accessed, so it cannot be accessed while in the field.
- One of the largest problems within the council is that systems and databases are not consistently updated.
- Our team uses uniform to view and record all of our actions. "If its not on Uniform, it didn't happen."
- This CSO's team doesn't use the Contender system, so they have to reach out to other teams to receive information from this system.
- Currently the community is not contacted or informed when deciding approval for a highways license. CSOs indirectly consider license impact on the community.

7.8 Appendix H: Section 87 of Environmental Protection Act 1990

87: Offence of leaving litter.

- (1) A person is guilty of an offence if he throws down, drops or otherwise deposits any litter in any place to which this section applies and leaves it.
- (2) This section applies to any place in the area of a principal litter authority which is open to the air, subject to subsection (3) below.
- (3) This section does not apply to a place which is “open to the air” for the purposes of this Part by virtue of section 86(13) above if the public does not have access to it, with or without payment.
- (4) It is immaterial for the purposes of this section whether the litter is deposited on land or in water.
 - (4A) No offence is committed under subsection (1) above where the depositing of the litter is—
 - (a) Authorised by law; or
 - (b) done by or with the consent of the owner, occupier or other person having control of the place where it is deposited.
 - (4B) A person may only give consent under subsection (4A)(b) above in relation to the depositing of litter in a lake or pond or watercourse if he is the owner, occupier or other person having control of—
 - (a) all the land adjoining that lake or pond or watercourse; and
 - (b) all the land through or into which water in that lake or pond or watercourse directly or indirectly discharges, otherwise than by means of a public sewer.
 - (4C) In subsection (4B) above, “lake or pond”, “watercourse” and “public sewer” have the same meanings as in section 104 of the Water Resources Act 1991.
- (5) A person who is guilty of an offence under this section shall be liable on summary conviction to a fine not exceeding level 4 on the standard scale.

(6) A local authority, with a view to promoting the abatement of litter, may take such steps as the authority think appropriate for making the effect of subsection (5) above known to the public in their area.

(7) In any proceedings in Scotland for an offence under this section it shall be lawful to convict the accused on the evidence of one witness.

7.9 Appendix I: Tables and Chairs Banding Class Fee Equation

Equation used to calculate license cost

C=number of chairs

H=number of hours after 19:00

B=banding fee

Bh=hourly banding fee

A=app fee

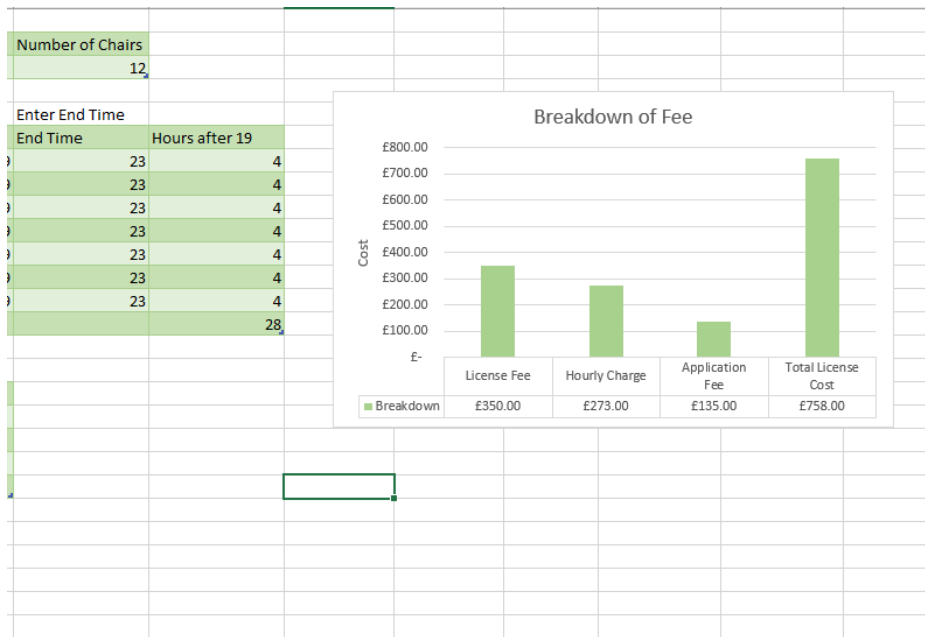
$$Total\ Cost = (C - 2) * B + \sum_{n=1}^7 H_n * Bh + A$$

Banding	A	B	C
Banding Fee	£ 51	£ 35	£ 24.5
Hourly Banding Fee	£ 16.5	£ 9.75	£ 5.75

Application Type	App fee
Mail	£ 135
Online before 14/07/18	£ 111
Online after 14/07/18	£ 99

7.10 Appendix J: Front User Panel of Excel Calculator

Enter Details of the Application		
Banding	Application Type	Number of Chairs
B	Mail	12
Enter Times that TAC will be present in 24hr i.e. 19 for 7pm		
Times	Enter Start Time	Enter End Time
	Start Time	End Time
Monday	19	23
Tuesday	19	23
Wednesday	19	23
Thursday	19	23
Friday	19	23
Saturday	19	23
Sunday	19	23
Total Hours After 19		
Program Generates Cost of License		
Breakdown of Fee		
License Fee	£	350.00
Hourly Charge	£	273.00
Application Fee	£	135.00
Total License Cost	£	758.00



7.11 Appendix K: Skip Company Survey

- Rank from strongly disagree to strongly agree
 - Filling out the Lambeth skip application is straightforward.
 - The application process takes a reasonable amount of time to complete.
 - Lambeth has good communication throughout the application process.
- How does your company most frequently apply for skip licenses? (choose one: Gov.uk, Email application form, Other)
 - How did your company learn how to apply this way? (short answer)
- Has your company worked with other boroughs? If so, which ones? (short answer)
 - How was your company's average experience with those boroughs in compared to Lambeth (much worse, worse, similar, better, much better)
- Has your company ever gone to deposit a skip and a car or other obstruction has blocked the designated spot? (yes/no)
 - If so, what did your company do? (short answer)
- Has your company ever received an FPN on a skip for lights and marks? (Yes/no)
 - If so, was your company aware of the reasoning behind the issued FPN? (Yes/no)
- Is your company aware that some roads do not fall under Lambeth's jurisdiction, but rather the jurisdiction of TfL? (yes/no)
- Does your company have any suggested improvements for the application process? (short answer)
- Does your company have any additional comments on the application process? (short answer)
- If your company would like to discuss the skip application more with Lambeth, please leave an email address where we can contact you further. (short answer)

7.12 Appendix L: Skip Survey Results

These results show answers to survey questions from four different skip companies.

Filling out the Lambeth skip application is straightforward.

Responses:

- Strongly Agree (2)
- Agree (1)
- Neither agree nor disagree (0)
- Disagree (1)
- Strongly Disagree (0)

The application process takes a reasonable amount of time to complete.

Responses:

- Strongly Agree (2)
- Agree (0)
- Neither agree nor disagree (0)
- Disagree (1)
- Strongly Disagree (0)

Lambeth has good communication throughout the application process.

Responses:

- Strongly Agree (1)
- Agree (2)
- Neither agree nor disagree (0)
- Disagree (1)
- Strongly Disagree (0)

How does your company most frequently apply for skip licenses?

Responses:

- Gov.UK (2)
- Email Application Form (3)
- Other (0)

How did your company learn how to apply this way?

Responses:

- Company 1: On the Lambeth Website
- Company 2: Lambeth Borough Website
- Company 3: Lambeth Website
- Company 4: Trial and error on computer

Has your company worked with other boroughs? If so, which ones?

Responses:

- Company 1: Yes, Sutton, Lewisham, Bromley, Croydon, Southwark, Greenwich, Kingston
- Company 2: Yes, Southwark, Hammersmith & Fulham, and Richmond
- Company 3: Yes, Wandsworth, Richmond, Lewisham, Bromley
- Company 4: Richmond, Kingston, Sutton, Croydon, Lewisham, Southwark, Merton, Surrey County Council, Wandsworth, etc.

How was your company's average experience with those boroughs in compared to Lambeth?

Responses:

- Much worse (0)
- Worse (1)
- Similar (2)
- Better (0)
- Much Better (1)

Has your company ever gone to deposit a skip and a car or other obstruction has blocked the designated spot?

Responses:

- Yes (3)
- No (1)

If so, what did your company do?

Responses:

- Company 1: Waited for the obstruction to be moved, as without bay suspension there is little we can do if the client hasn't suspended the bay
- Company 2: If no bay, placed as close to the property as possible. If in bay, left and tried another time
- Company 3: Had to bring the skip back and wait until the space was available

Has your company ever received an FPN on a skip for lights and marks?

Responses:

- Yes (4)

If so, was your company aware of the reasoning behind the issued FPN?

Responses:

- Yes (4)

Is your company aware that some roads do not fall under Lambeth's jurisdiction, but rather the jurisdiction of TfL?

Responses:

- Yes (3)
- No (1)

Does your company have any suggested improvements for the application process?

Responses:

- Company 1: Yes, If a road has extra charges I.E Traffic Sensitive Road, New Suspensions. there should be a way of knowing this before applying. right now I'm having to email KAdelaja2@lambeth.gov.uk before applying for a licence.

- Company 2: No we are happy with the process.
- Company 3: Lewisham Council only require 2 days and it's all done with an online form which takes 5 mins, and they send the permits through straightaway. I can't understand why Lambeth cannot do the same.
- Company 4: Don't make things too complicated, notice periods to obtain a licence too long, make bay suspension and licence one process.

Does your company have any additional comments on the application process?

Responses:

- Company 1: There should be a quicker renew period.
- Company 2: Yes. It is a long process with the form which you have to attach and would be easier if it was done with an online form. Also it's hard to know which roads are traffic sensitive so always have to make additional payment.
- Company 3: Sometimes the computer online service will not complete the transaction, but the staff are very helpful to help.

If your company would like to discuss the skip application more with Lambeth, please leave an email address below so we can contact you further.

Responses:

- Company 1: admin@jnskips.co.uk

7.13 Appendix M: Tables and Chairs Businesses

Interviews

Questions:

- Do you apply for this business TAC license?
- How long have you had a TAC license?
- Do you think the application process is time consuming or difficult to fill out?
- Have you ever paid the incorrect amount for the license or had difficulty determining the correct license fee?
 - How did your interaction with the council to resolve the issue go?
 - If this calculation was simpler would this be beneficial?
- Have the prices of these licenses prevented you from placing as many tables/chairs outside as you would like?
- Is your business being limited by the number of tables and chairs you are allowed to have?
- Why do you think this license exists?
- Do you think that having to apply for the license is reasonable?
- Do you apply for other business licenses for Lambeth?
 - Do you feel you frequently have to enter the same information multiple times for different applications?
 - If you could create an account and upload all of your business information once, would you save significant time applying for licenses?
- Do you have any suggestions on how to improve the process?
- Would you rather obtain a license to put out a specific number of tables and chairs (as it is now) or one to specify a designated area to put any number of tables and chairs in?

For those who don't apply

- Do you apply for any other licenses?
- Have you heard of any opinions from the person who does do TaC on the application process?
- Explain business must apply annually, pay per tac per hour

- Currently you pay for each chair, would rather be area?
- Why do think license exists?
- The license costs X, do you think that having to apply for the license is reasonable?
- Do you think your business could benefit from more TAC outside?
 - Do you know if the prices of these licenses prevented you from placing as many tables/chairs outside as you would like?

Business 1 Responses:

- He has been completing the application himself online for three years now
- He found the process to be time consuming and thought that the customer form is difficult to fill out. Section where the applicant enters in hours is not ordered logically i.e. Saturday is listed before Friday. Also, there is a confusing button after the customer submits payment that asks for them to submit payment, he found it to be confusing.
- He did pay the wrong amount once and found the payment calculation confusing. Later a Lambeth representative called him, and he paid the difference over the phone.
- He found that the price of the license did deter him from placing as many chairs as he wanted as he wanted eight chairs but did not believe it to be cost effective.
- He believed that the borough owns the land and that the licenses were there to pay for the people who clean the street.
- He overall thought that the licenses were too expensive and that the fee per chair is too high.
- He has not had a problem with entering in repetitive information but has found that the council is slow to reply and difficult to contact.
- He believed that it would be nice if the reapplication process was simpler believing that it would be better if they would just update applicants with any changes to the fee that needed to be paid and then the application could go through. Also, he believed that checkout should be easier and that an application should auto calculate the fee.
- He was fine with using the number of chairs as a way to determine price and did not see the benefit of doing it by area but said that he would be willing to try it.

Business 2 Responses:

- He has been applying himself for 5-6 years.
- He believes that it is difficult to draw tables and chairs on the application and believes that just the number of a picture of the premises included online would be easier.
- He believes that the application fee is too high and does not believe in the renewal fee.
- He thinks the license fee just exists for the payment and revenue.
- He is also unhappy with paying the license fee because he is unhappy with the street cleaning service that it provides. Often times street cleaners only come to his street once a month or even once every two months.
- He would like to have the option of paying for two months out of the year at a time rather than paying for the whole year as he only ever uses TAC for two months in the summer.

7.14 Appendix N: FPN Data

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	SEC87	SEC87														
2																
3	Total		Mont													
4	Penalty_Type1	Source	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17
5	SEC87 Litter Fixed Penalty notice Issued	Internal	3	78	88	13	22	47	134	141	39	28	73	22	47	40
6		NSL												377	365	315
7	SEC87 Spitting FPN Issued	Internal								1						
8		NSL														2
9	SEC87 Urination FPN Issued	Internal			2	7	4	3	2	3	1		1	3		1
10		NSL														
11	Grand Total		3	78	90	20	26	50	136	145	40	28	74	402	412	358

	A	B	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE
1	SEC87	SEC87																
2																		
3	Total																	
4	Penalty_Type1	Source	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Grand Total
5	SEC87 Litter Fixed Penalty notice Issued	Internal	40	27	45	87	90	98	78	2	57	75	86	34	22	17	1	1494
6		NSL	315	304	433	462	528	344	189	255	296	642	761	1039	1131	754	96	8291
7	SEC87 Spitting FPN Issued	Internal		1				1										3
8		NSL	2	2	9	9	2	1	4		1	2		3	1	1		37
9	SEC87 Urination FPN Issued	Internal	1							1		1				1		30
10		NSL			1								1					3
11	Grand Total		358	334	488	558	620	444	271	259	354	720	848	1076	1154	773	97	9858

	A	B	C	D
1	Uniform_Ref_No	FPN_Reference	Penalty_Type1	Address_of_Incident1
2			Sec 47 Fixed Penalty Notice Issued	
3			Skip - No lights or marks FPN - SEC1394A	
4			Skip - No lights or marks FPN - SEC1394A	
5			Skip - No lights or marks FPN - SEC1394A	
6			Skip - Unlicensed FPN - SEC139(3)	
7			Skip - Unlicensed FPN - SEC139(3)	
8			Skip - Unlicensed FPN - SEC139(3)	
9			Skip - Unlicensed FPN - SEC139(3)	
10			CPN FPN issued (Commercial)	
11			SEC87 Litter Fixed Penalty notice Issued	
12			SEC87 Litter Fixed Penalty notice Issued	
13			SEC87 Litter Fixed Penalty notice Issued	
14			PSPO Fixed Penalty Notice issued	
15			SEC87 Litter Fixed Penalty notice Issued	
16			SEC87 Litter Fixed Penalty notice Issued	
17			SEC87 Litter Fixed Penalty notice Issued	
18			SEC87 Litter Fixed Penalty notice Issued	
19			Sec 47 Fixed Penalty Notice Issued	
20			Skip - Unlicensed FPN - SEC139(3)	
21			Skip - Unlicensed FPN - SEC139(3)	
22			SEC87 Litter Fixed Penalty notice Issued	
23			SEC87 Litter Fixed Penalty notice Issued	
24			SEC87 Litter Fixed Penalty notice Issued	
25			SEC87 Litter Fixed Penalty notice Issued	
26			Sec 34 Fixed Penalty Notice Issued	
27			Skip - Unlicensed FPN - SEC139(3)	
28			Skip - Unlicensed FPN - SEC139(3)	
29			Skip - Unlicensed FPN - SEC139(3)	
30			Sec 34 Fixed Penalty Notice Issued	
31			Skip - Unlicensed FPN - SEC139(3)	
32			Skip - Unlicensed FPN - SEC139(3)	
33			SEC87 Litter Fixed Penalty notice Issued	
34			SEC87 Litter Fixed Penalty notice Issued	
35			SEC87 Litter Fixed Penalty notice Issued	
36			SEC87 Litter Fixed Penalty notice Issued	
37			SEC87 Litter Fixed Penalty notice Issued	
38			SEC87 Litter Fixed Penalty notice Issued	
39			SEC87 Litter Fixed Penalty notice Issued	

This image is heavily censored in order to maintain confidentiality. This image shows the first 38 FPN records of 13,490 issued from 2016 to 2018.

7.15 Appendix O: Tower Hamlets Interview

Could you describe the basic process for approving a tables and chairs license?

Business owners can go online to print a PDF, fill it out, and bring it to the council. If the council finds that the application is filled out correctly, an enforcement official will be sent to consult the premises.

In the next few months the council is getting a new software system to manage all of this. Businesses can apply online, but they still have to show up to the borough in person as per the requirement of the legislation.

What factors does an enforcement official look at during the consultation?

The enforcement official makes sure that the tables and chairs are farther than 1.8 meters from the curb. They also look for nearby highways obstruction or factors that may cause people to congregate near the business, such as bus stops. If they find that the business would not obscure the walkway too much, it is approved.

Does your council base the license on the number of tables and chairs or the area the business occupies?

Area. Businesses pay one pound per square meter per day.

Do you ever find that businesses try to lie about the area they are paying for?

We have not had problems from that, no.

When you get an application from a business, do you do any background research on them?

If the business holds a liquor license, we contact Metropolitan Licensing to see if they have a good record.

Do you do any follow up consultations or enforcement?

We try to consult businesses every few years. Also, if a patrolling enforcement official sees obstructive tables and chairs, he returns to the office to verify their license.

Do you ever revoke your licenses?

Not usually, no. We had one instance where a business was become a noise problem and we decided to revoke its license. We have the ability to do that because we issue temporary licenses. We used to issue permanent licenses that allowed business to appeal to keep their license and bring it to the Local Magistrates Court. We stopped issuing those license awhile ago, I think we got rid of them by 2008.

Do you require tables and chairs to be within a certain distance of the storefront?

Businesses have to place their tables and chairs within 1.5 meters of the storefront. This means that business can't have much more than one row of tables and chairs in front of their business. We find that if we give businesses any more room, they tend to sprawl out into the street.

Do you use a banding system to charge businesses more or less based on their street?

No. A higher up put pressure on our team to implement a banding system, but we decided against it for two reasons. First, we didn't think we could easily determine which streets had the most foot traffic without committing significant resources. Second, we thought that having to verify the banding of every business on their application would add much more time to the administrative process of every license based on the non-digital process we are currently using.

7.16 Appendix P: Tables and Chairs Consultation Checklist

Spacing

Does the TAC area extend more than 1.3m from the front of the premises?

Does the TAC area have a distance of at least 1.8m from the curb or any other obstructions i.e. bus stops or trees?

Is there a reasonable amount of space left of the public highway for foot traffic that would be typical for this area at these times?

Is there adequate room for people with less mobility to get through safely i.e. wheelchairs or baby carriages?

Licenses Details

Does the number of chairs on the application form match the amount that they plan to put out?

Is there a reasonable amount of space for these chairs and the tables that will accompany them?

Does the arrangement of tables and chairs match the drawing provided?

Disturbances to the Public Space

Do the obstructions placed on the highway seem temporary enough to be taken in easily at night?

Are there residencies near the business that would be disturbed by the placement of TAC?

Will the placement of TAC contribute to any additional ASB such as littering, spitting, or public urination?

If the premises serve alcohol, do they have a protocol for dispersing their customers?