

**From:** Caroline Hay <[Caroline.Hay@cityoflondon.police.uk](mailto:Caroline.Hay@cityoflondon.police.uk)>  
**Sent:** Friday, May 26, 2023 8:15 PM  
**To:** Paul Holmes <[Paul.Holmes@cityoflondon.police.uk](mailto:Paul.Holmes@cityoflondon.police.uk)>  
**Cc:** Licensing Office <[licensingoffice@cityoflondon.police.uk](mailto:licensingoffice@cityoflondon.police.uk)>  
**Subject:** RE: LETTER FAO CHIEF OFFICER OF POLICE - Conviction of Personal Licence Holder - Representation Required

I am minded to revoke, based on not only the conviction but the fail to notify. The mitigation is also pretty weak. I am also concerned about the link to alcohol and his responsibilities as a license holder. However, the act makes clear that to grant/renew, the offence must be SERIOUS in nature. Whilst I acknowledge drink drive is an extremely serious matter and the consequences can be catastrophic, in terms of CPS charging standards, home office guidance, the gravity matrix, I do not consider this offence to fall within the categories below.

*Convictions for offences which are relevant for the purposes of the determination of applications for the grant or renewal of a personal licence include:*

- *those involving serious crime*
- *those involving serious dishonesty*
- *those involving the supply of drugs*
- *certain sexual offences*

As noted by the Corporation, he has been convicted and is suffering the consequences of that suspension. Therefore, I agree with the Corporation, that a revocation is not necessary in these circumstances.

I have noted a similar case in Lincolnshire, however, there is a significance difference in that the licence holder sought to blatantly deceive the licensing authority. Although this holder has not satisfied the requirements of him, it cannot be shown that this was malicious or intentional. [South Kesteven District Council - Agenda item - Licensing Act 2003: Suspension or revocation of a personal licence](#)

I note that this decision could be interpreted differently with differing rationale. However, we are given this responsibility and should be clear with our rationale. I have applied the PLAN scale, proportionality/legality/accountability/necessity and have used the NDM to come to my decision.

Kind regards,

Caroline



[caroline.hay@cityoflondon.pnn.police.uk](mailto:caroline.hay@cityoflondon.pnn.police.uk)  
[www.cityoflondon.police.uk](http://www.cityoflondon.police.uk) †  
[www.twitter.com/WeCopsCaroline](https://www.twitter.com/WeCopsCaroline)