

8 November 2023

Jeremy Quinn MP
Minister for the Cabinet Office
Houses of Parliament
London,
SW1A 0AA

By email to: publiccorrespondence@cabinetoffice.gov.uk

Dear Sir or Madam

GOV.UK Licensing Forms

The Institute of Licensing (IoL) and National Association of Licensing and Enforcement Officers (NALEO) wrote to the Cabinet Office in January 2021 expressing our concerns regarding the position, at that time, in relation to potential plans to discontinue the [GOV.UK](#) licensing forms. These forms were, then, and still are, widely in use across England and Wales.

By way of initial response, we were informed by email on 21st January 2021 that the online forms service would continue until March 2022 and, that work would be undertaken in the meantime to look at future options for the continuation of the, or a similar, service. The email stated:

Thank you for your email of 6 January raising concerns about the possible retirement of the GOV.UK Licensing platform. Please, accept our apologies for the delay in responding to you.

The Government Digital Service has been working with stakeholders to explore options to replace the current GOV.UK Licensing platform for several years. We have concerns that the platform no longer meets the current government service design requirements or the needs of some of our users. It appears the service in its current form has reached the end of its lifecycle and should be retired.

However, we have noted the concerns raised by local authorities and licensing sector stakeholders following GDS's recent consultation exercise. We understand this is a critical service for many across the public sector and that no alternative arrangements have been provided. We also appreciate that retiring the platform now will present significant difficulties given the other pressures you're facing in responding to the pandemic.

*We are therefore pleased to confirm that the GOV.UK Licensing platform will not be retired by 31 March 2021. **GDS will instead continue to work with colleagues across central and local government, and with other stakeholders, to plan for a transition to new arrangements in 2022.** GDS officials will ensure you and other relevant stakeholders are closely involved.*

I hope you find our response reassuring.

Just over 12 months later, on 16th March 2022, we were contacted by Mr Kashif Chaudhry who had joined the Cabinet Office and been tasked with looking at the online licensing forms. That marked the start of regular (monthly) online meetings between Kashif and representatives from the Home Office, IoL, NALEO and the Local Government Association (LGA). These regular meetings have been productive and positive with clear indications of the intention for GDS to provide an alternative central licensing form service through GOV.UK.

In January this year, we were able to share the commitment from the Cabinet Office to extend the existing provision for a further 2 years (until March 2025), meanwhile we continued to discuss potential solutions and worked with Kashif to put him in touch with various licensing authorities to enable him to continue to scope out the new service in direct consultation with local authority users. We had also started to discuss the potential for developing national databases for various licensing regimes including personal licences under the Licensing Act 2003, and taxi & private hire drivers, noting likely future needs for additional national databases for non-surgical cosmetic licensing which will be subject to licensing reform under the Health and Care Act 2022.

This time and effort by all parties illustrates the importance of the service to local authorities, licence applicants and their agents. The GOV.UK licensing service presents national consistency, a single online point of reference and by far the best practical means of meeting the statutory requirements of the Provision of Service Regulations 2009. The IoL chairs the National Licensing Forum (NLF) which is a stakeholder group with representatives from government, professional bodies, hospitality and retail associations, and the online forms has been a regular agenda item with NLF members reiterating the need for this service, and concerns at any potential moves to withdraw it without a replacement service.

In August 2023, we were informed that Kashif would be leaving the Cabinet Office with immediate effect. It appears that Kashif's departure has reset the entire process and wiped out all the progress we had made. It was reported to us that two new people have been appointed to GOV.UK project, Rachel Stanley (heading up licensing forms work) and Martin Lugton (head of product management at GDS). Both Rachel and Martin initially indicated to the working group that the decommissioning of the licensing portal is still potentially intended in March 2025 with no clear commitment to any replacement service.

We have expressed our concern and disappointment at what appears to be a potential backtracking on the entire project, despite the time and commitment given by all those around the table to discuss and assist in the project. We would reiterate these concerns now, and the fact that we have essentially lost 2 years in the meantime to be no further forward in achieving a suitable replacement to the current online forms.

When we initially raised our concerns, we were hearing from local authorities faced with huge budget deficits, faced with the prospect of making heavy investments into replacement licensing systems in light of the plans at that time to decommission online forms in March 2022. There was considerable consternation at the prospect, with some authorities talking about in house development of systems from scratch, and others predicting a return to manual, paper-based systems for licensing.

We consider it likely that the position is substantially unchanged at this point. There has been no clear communication from the Cabinet Office to suggest whether or not the current online form provision will be removed entirely or replaced. All our efforts in working together have been in pursuit of the latter option - a replacement system to serve licensing authorities and applicants going forward, and to meet the requirements of the Provision of Services Regulations.

While the online licensing forms are admittedly not perfect, they are substantially better than no system at all and provide a national portal for licence applicants (or their representatives) to go to in the first instance. Ending the system is a retrograde step for all concerned and removes a rare point of consistency between many councils.

The issue was also referenced in the House of Lords Licensing Review and the Government response to the follow up report published in November 2022 noted that a team has been appointed to “identify and implement the best solution”.

As previously noted, we are aware that the current system has been extended to 31st March 2025. However, that date is fast approaching and many licensing authorities may not have been able to implement or resource an online application system. We feel that it is essential to further extend the deadline to enable GDS to properly explore and develop an alternative solution for the benefit of all stakeholders.

I hope that our concerns are unfounded and that representatives from the Cabinet Office will be able to assure us that the project will remain on track. We will of course continue to support the project and would welcome the opportunity to assure all parties that a solution will be reached.

Yours faithfully



Daniel Davies
National Chairman
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John Miley
National Chairman
National Association of Licensing and Enforcement Officers

Cc
Home Office
Local Government Association
Lawyers in Local Government