


Stevenage

BOROUGH COUNCIL

ENVIRONMENTAL HEALTH & LICENSING

Civil and Financial Penalty Policy – as an alternative to prosecution under the Housing Act 2004 and calculation of financial penalties as prescribed in associated housing legislation

**You can comment on this policy:
By writing to:**

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Stevenage Borough Council
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1. Background

The Housing and Planning Act 2016 enables a local housing authority to impose a financial penalty of up to £30,000, as an alternative to prosecution for specific breaches of the Housing Act 2004. The Council adopted “Civil penalties under the Housing and Planning Act 2016 – policy and procedure” on 20 September 2017. Throughout this policy the terms “financial penalty” and “civil penalty” are interchangeable.

The scope of financial penalties was extended in 2020 with the introduction of the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020; breaches of regulation 3 allow for a financial penalty to be imposed up to £30,000.

In accordance with the new section 249A(4) of the 2004 Act, as amended, the amount of a financial penalty is to be determined by the local housing authority. Although the statutory guidance recommends factors a local authority should take into account when deciding on the level of penalty, it does not go into any level of detail in this regard. This revised policy is largely based on the principles set out in the Sentencing Guidelines for use in Magistrate’s Court published by the Sentencing Council in October 2019

The Council therefore has wide discretion in determining the appropriate level of civil penalty in a particular case and seeks to set out further guidance through this policy as to how it will do so.

2. Relevant guidance

The policy is produced in accordance with the following guidance:

- MHCLG Civil Penalties under the Housing and Planning Act 2016 - Guidance for Local Housing Authorities, published in April 2018 which sets out the factors which must be taken into account when deciding on the appropriate level of penalty
- Sentencing Guidelines for use in Magistrate’s Court – Sentencing Council October 2019
- Guide for local authorities: electrical safety standards in the private rented sector, a non- statutory government guide which advises that the local housing authority may wish to consider existing policies developed for financial penalties under the Housing Planning Act 2016

3. Legal references

- a. Schedule 9 of the Housing and Planning Act 2016 introduced amendments to the Housing Act 2004 that allow local housing authorities to impose financial penalties, up to a maximum of £30,000, as an alternative to prosecution for the following relevant housing offences under the 2004 Act:

- section 30 (failure to comply with improvement notice),
 - section 72 (licensing of Houses in multiple occupation (HMOs)),
 - section 95 (licensing of houses under Part 3),
 - section 139(7) (failure to comply with overcrowding notice), or
 - section 234 (management regulations in respect of HMOs).
- b. The Housing and Planning Act 2016 section 14 introduced Banning Orders for the worst offending landlords. Section 15 of the Act confers powers on local authorities to apply to the First-tier Tribunal for a banning order against a person who has been convicted of a Banning Order offence. The Housing and Planning Act (Banning Order Offences) Regulations 2018 list Banning Order offences. A Banning Order precludes a person from:
- letting housing in England;
 - engaging in English letting agency work
 - engaging in English property management work, or
 - doing two or more of those things
- c. Section 21 states that a person breaching a Banning Order commits an offence while section 23 allows the local authority to issue a financial penalty, up to the maximum of £30,000, as an alternative to prosecution.
- d. The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 (ESSR 2020) require private rented sector landlords to ensure minimum electrical safety standards are met; this includes inspection and testing of the electrical installation every 5 years. Where the local housing authority find that landlords are in breach of their duties under regulation 3 of the ESSR 2020 they allow for a financial penalty to be imposed, up to £30,000, and may apply the proceeds to meet the cost and expenses in, or associated with, carrying out any of its enforcement functions in relation to the private rented sector.

4. Decision to issue a financial penalty

The decision to issue a financial penalty comprises two stages:

- determine whether a financial penalty is an appropriate sanction in accordance with this policy, and, if appropriate
- determine the level of the proposed financial penalty.

5. Factors to be considered when deciding the level of the financial penalty

It may be that more than one of the following considerations is relevant and the importance of each must be weighed against the particular offence and offender characteristics when determining sentence:

- i. *Severity of the offence* – The more serious the offence the higher the penalty should be.
- ii. *Culpability and track record of the offender* – A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and /or they knew, or ought to have known, that they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.
- iii. *Punishment of the offender* – A financial penalty should not be regarded as an easy or lesser option compared to prosecution. While the penalty should be proportionate and reflect both severity of the offence and whether there is a pattern of previous offending, it is important that it is set at a high enough level to have real economic impact on the offender and demonstrates the consequences of not complying with their responsibilities.
- iv. *Deter the offender from repeating the offence* – The ultimate goal is to prevent any further offending and help ensure that the landlord fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set sufficiently high that it is likely to deter the offender from repeating the offence.
- v. *Deter others from committing similar offences* - While the fact that someone has received a civil penalty will not be in the public domain, it is possible that other landlords in the local area will become aware through informal channels when someone has received a financial penalty. An important part of deterrence is the realisation that a) the local housing authority is proactive in levying civil penalties where the need to do so exists and b) that the financial penalty will be set at a high enough level to both punish the offender and deter repeat offending.
- vi. *Removal of any financial benefit* - The offender may have obtained as a result of committing the offence. The guiding principle should be to ensure there is no benefit as a result of committing an offence. ie it should not be cheaper to offend than to ensure the property is well maintained and properly managed.

6. General principles to follow in setting a financial penalty

The Council will finalise the appropriate level of penalty so that it reflects the seriousness of the offence and will take into account the financial circumstances of the offender.

The level of financial penalty should reflect the extent to which the offender fell below the required standard. The financial penalty should meet, in a fair and proportionate way, the objectives of punishment, deterrence and the removal of gain derived through the commission of the offence; it should not be cheaper to offend than to take the appropriate precautions. The principle behind issuing civil penalty notices is that there is no financial gain to the alleged perpetrator of the relevant offences.

To cover the costs of the work involved in serving any financial penalty notice, the costs incurred will be added to the overall penalty, where those costs have not been recovered under other powers. The costs incurred will be calculated for each case using the officer time spent multiplied by the officer hourly rate (published in Environmental Health and Licensing “Fees and Charges”). Part hours will be rounded up to the full hour. Any other costs incurred as part of the enforcement action, not already recovered, will also be added to the overall penalty.

7. Determining the level of financial penalty

STEP ONE – Determining the offence category

The seriousness of the offence is assessed by considering:

- the culpability of the offender and;
- the harm caused by the offending

a. Culpability

Culpability is assessed with reference to the offender’s role, level of intention and/or premeditation and the extent and sophistication of planning:

Very High Culpability Deliberate	<ul style="list-style-type: none"> • intentional act or omission – the offender intentionally breached, or flagrantly disregarded the law or • Who was in high public profile and know their actions were unlawful
High Culpability Reckless	<ul style="list-style-type: none"> • acted or failed to act regardless of the foreseeable risk • Actual foresight of, or wilful blindness to, risk of offending but risk nevertheless taken
Medium Culpability Negligent	<ul style="list-style-type: none"> • failed to take steps to guard against the act or omission ; • offence committed through act or omission which a person exercising reasonable care would not commit
Low culpability	<ul style="list-style-type: none"> • act or omission with none of the above features and little fault. For example: <ul style="list-style-type: none"> a) Significant efforts were made to address the risk although inadequate on this occasion.

	<p>b) There was no warning/circumstances indicating a risk</p> <p>Failings were minor and occurred as an isolated incident</p>
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b. *Harm*

Harm was intended to have been caused, or might foreseeably have been caused (real and perceived). The factors relate to both realised harm and risk of harm. The Council will apply the following definition of harm taken from the Housing HHSRS guidance published in February 2006.

“Harm is an adverse physical or mental effect on the health of a person. It includes for example, physical injury, and illness, condition or symptoms where physical or mental. It also includes both permanent and temporary harm.”

<p>High likelihood of harm Harm Category 1</p>	<p>Adverse effect on/caused to individual victims, including where persons are vulnerable or to wider public /environmental etc. and/or having widespread impact.</p>
<p>Medium likelihood of Harm Harm Category 2</p>	<ul style="list-style-type: none"> • Adverse effects on individual(s) (not amounting to category 1) • Medium risk of an adverse effect on individual(s) or low risk of serious adverse effect • The Council and/or legitimate landlords or agents substantially undermined by offender’s activities • The Council’s work as a regulator to address risks to health is inhibited • Consumer/tenant misled
<p>Low likelihood of harm Harm category 3</p>	<ul style="list-style-type: none"> • Low risk of an adverse effect on individual(s) • Public misled but little or no risk of actual adverse effect on individual(s)

The initial assessment of harm and culpability should take no account of plea or previous convictions.

STEP TWO - Starting point and category range

Having determined the category, the Council should refer to the starting points of the Financial Matrix in section 9 below to reach an appropriate level of financial penalty within the category range.

Further adjustment can be considered within the category range for aggravating and mitigating features, as listed in Appendix A - Aggravating and Mitigating Factors to be considered.

- Identify whether a combination of these or other relevant factors should result in any upward or downward adjustment from the sentence arrived at so far.
- It is for the investigating officer to determine how much weight should be assigned to the aggravating and mitigating factors taking into account all of the circumstances of the offence and the offender. The justification of all decisions to be fully documented and available for scrutiny.
- Not all factors that apply will necessarily influence the sentence.

8. Financial Penalty Matrix

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability.

	Starting point	Range	
		Min	Max

• Low Culpability

Harm category 3	£300	£250	£350
Harm category 2	£425	£350	£500
Harm Category 1	£625	£500	£750

• Medium Culpability (Negligent)

Harm category 3	£875	£750	£1000
Harm category 2	£1500	£1000	£2000
Harm Category 1	£3250	£2000	£4500

• High Culpability (Reckless)

Harm category 3	£5250	£4500	£6000
Harm category 2	£7000	£6000	£8000
Harm Category 1	£10250	£8000	£12500

• Very High Culpability (Deliberate)

Harm category 3	£13750	£12500	£15000
Harm category 2	£17500	£15000	£20000
Harm Category 1	£25000	£20000	£30000

9. Financial Assessment

Criminal Justice Act 2003 s164(1) –“ before fixing the amount of fine the court must inquire into his financial circumstances.”

The level of fine must be proportionate to the seriousness of the offence and the financial circumstances of the offender.

It is for the offender to disclose to the Council such information as is relevant to his/her financial position on representation following service of the Notice of Intention. Where an offender fails to provide such information the Council may conclude the offender is able to pay any penalty imposed.

The officer must have consideration of rental income, market value of the property, ownership of other properties and their rental income and any other available financial information. The Council may undertake its own financial investigation within the means available to it. Please see Appendix C- Assessment of financial circumstances form to be sent with Notice of Intention.

10.Reductions

Consider any factors which indicate a reduction in the penalty and in so doing the Council should have regard to the following factors relating to the wider impacts of the financial penalty on innocent third parties; such as (but not limited to):

- impact of the financial penalty on offender's ability to comply with the law or make restitution to victims;
- impact of the financial penalty on employment of staff, service users, customers and local economy.

Reduction for early admission of guilt

The Council will take into account a potential reduction in penalty for an admission of guilt. The following factors will be considered in setting the level of reduction.

- The stage in the investigation or thereafter when the offender admitted guilt
- The circumstances in which they admitted guilt
- The degree of co-operation with the investigation
- The maximum level of reduction in a penalty for an admission of guilt will be one-third.

In some circumstances there will be a reduced or no level of discount. For example where the evidence of the offence is overwhelming or there is a pattern of criminal behaviour. Any reduction should not result in a penalty which is less than the amount of gain from the commission of the offence itself. For example the penalty must not be less than the cost of remedial work

11.Total principle

If there is more than one offence and multiple civil penalty fines are being issued the general principles of totality must be considered:

- a. Is the total fine just and proportionate to the overall offending behaviour; however, if a civil penalty is being served for each offence each penalty must be assessed individually.
- b. Simply adding the total fines together may not give a just and proportionate penalty fine. It is necessary to have regard to offending behaviour.

12. Review of Penalty

The Council should review the penalty and, if necessary adjust the initial amount reached at step two (see Section 7 above) to ensure that it fulfils the general principles set out above. The Council may increase or reduce the proposed fine reached at step two, if necessary moving outside of the range in the Financial Penalty Matrix. Any quantifiable economic benefit derived from the offence, including through avoided costs or operating savings, should normally be added to the total financial penalty arrived at in step two. Where such information is not readily available, the Council may draw on information available from enforcing authorities and others about the general costs of operating within the law. The risk that the penalty will have the effect of putting the offender out of business will be relevant but in some serious cases this might be an acceptable outcome.

13. Recording the decision

The officer making a decision about a financial penalty will record their decision giving reasons for coming to the amount of financial penalty that will be imposed. See Appendix D

14. Recovery of non-payment of a financial penalty notice

Where a person fails to pay whole or any part of a financial penalty the person is liable to pay, the Council may instigate proceedings before the County Court.

15. Costs incurred as the result of an appeal

The financial penalty does not include any sum to account for additional costs that may be incurred in responding to an appeal against the decision to impose a penalty or the amount of the penalty itself. Rule 13 of the Tribunal Procedure (First-tier Tribunal) (Property Chamber) Rules 2013 allows the Tribunal discretion to award costs where a party has acted unreasonably in bringing an appeal. The Council may seek to recover its legal costs in defending any appeal which is brought unreasonably.”

Appendix A - Aggravating and mitigating factors to be considered

Care should be taken to avoid double counting factors including those already taken into account in assessing culpability or harm

Statutory aggravating factors:

Previous convictions, having regard to:

- a) The nature of the offence* to which the conviction relates and its relevance to the current offence; and
- b) The time that has lapsed since the conviction.

***See Appendix B for non- exhaustive list of relevant convictions**

Discretionary aggravating factors include:

(Factors are not in any particular order and are not exhaustive)

Factors	
Motivated by financial gain	Where the offending is committed in a commercial context for financial gain or the avoidance of cost, this will normally indicate a higher level of culpability e.g. failing to obtain a HMO licence. Where an offence has been committed wholly or in part for financial gain or the avoidance of cost this will increase the seriousness.
Deliberate concealment of illegal nature of activity	The more sophisticated, extensive or persistent the actions to conceal the actions, the more likely it is to increase the seriousness of the offence.
Established evidence of wider/community impact	This should be supported by a Community Impact Statement
Obstruction of justice	Supporting evidence – file notes, warrant application etc
Record of providing sub-standard accommodation	Supporting evidence, consider history of landlord in respect of standard of accommodation
Record of poor management or not meeting legal requirements	Supporting evidence

Refusal of free advice or training	Supporting evidence
Exploiting the vulnerability of occupant	<p>An offence is more serious if the victim is vulnerable because of personal circumstances such as (but not limited to) age, illness, physical disability or serious medical condition requiring urgent, intensive or long term treatment or disability (unless the vulnerability of the victim is an element of the offence).</p> <p>Other factors such as the victim being isolated , incapacitated through drink or being in an unfamiliar situation may lead to the Council considering the offence is more serious.</p> <p>The extent to which any vulnerability may impact on the sentence is a matter for the Council to weigh up on each case.</p> <p>Culpability will increase if the offender targeted a victim because of an actual or perceived vulnerability. The level of harm (physical, psychological or financial) is likely to be increased if the victim is vulnerable.</p>
Blame wrongly placed on other(s)	Where the investigation has been hindered and /or others have suffered as a result of being wrongly blamed by the offender, this will make the offence more serious.
Failure to respond to warnings or concerns expressed by others about the offender's behaviour	<p>Where an offender has had the benefit of warnings or advice about their conduct but has failed to heed it, this would make the offender more blameworthy.</p> <p>This may particularly be the case when:</p> <ul style="list-style-type: none"> • Such warning(s) or advice were of an official nature or from a professional source and /or <p>The warning(s) were made at the time of or shortly before the commission of the offence</p> <p>This factor will NOT be engaged where an offender has simply exercised their right not to assist the investigation or accept responsibility for the offending.</p>

Factors reducing seriousness or reflection personal mitigation

(factors are not in any particular order and are not exhaustive)

Factors	Consideration
No previous conviction or no relevant/recent convictions	First time offenders usually represent a lower rate of reoffending; and considered as less blameworthy. See list Appendix A for list of relevant offences. Consider time gap between offences
Remorse	Need to be satisfied of genuine remorse for the offending behaviour in order to reduce the penalty. Lack of remorse must not be treated as aggravating factor.
Self- reporting	Where an offender has self- reported to the authorities, particularly where the offence may have otherwise gone undetected, this should reduce the penalty.
Cooperation with the investigation/early admissions	Assisting or cooperating with the investigation
Little or no planning	Where an offender has committed the offence with little or no prior thought, this is likely to indicate a lower level of culpability and therefore justify a reduction in fine.
The offender was in a lesser or subordinate role if action with others/ performed limited role under direction. /involved through coercion, intimidation or exploitation	Where this applies it will reduce the culpability of the offender. This may of particular relevance where the offender has been the victim of domestic abuse, trafficking or modern slavery, but my also apply in other context.
Limited awareness or understanding of the offence	Where an offender lacks capacity to understand the full extent of the offending – may reduce culpability.
Little or no financial gain	Where an offence is committed in a context where financial gain could arise, the capability of the offender may be reduced where it can be shown that the offender did not seek to gain financially from the conduct and did not in fact do so.
Activity originally legitimate	Where the offending arose from an activity which was originally legitimate but became unlawful, this may indicate

	<p>lower culpability and thereby a reduction in find.</p> <p>This factor will not apply where the offender has used a legitimate activity to mask breaches of the legislation.</p>
<p>Physical disability or serious medical condition requiring urgent, intensive or long term treatment</p>	<p>There will always be a need to balance issues personal to an offender against the gravity of the offending and the public interest in imposing appropriate punishment.</p> <p>A terminal prognosis is not in itself a reason to reduce the sentence even further. The Council must ensure the level of fine meets the aims of the civil penalty.</p> <p>Mental disorders and learning disabilities are different things, although an individual may suffer from both. A learning disability is a permanent condition developing in childhood, whereas a mental illness can develop at any time, and is not necessarily permanent; people can get better and resolve mental health problems with the help of treatment. In consider these issues officers must refer to the Sentencing Guidelines for use in Magistrates' Court – Sentencing Council October 2019 Magistrate – or most recent published guidance.</p>

Appendix B - Non-exhaustive list of relevant offences

Housing law or landlord and tenant:

Offences under:

- The Public Health Acts of 1936 and 1961
- The Building Act 1984
- The Environmental Protection Act 1990
- The Town and Country Planning Act 1990
- The Prevention of Damage by Pests Act 1949
- The Protection from Eviction Act 1977
- The Local Government (Miscellaneous Provisions) Acts of 1982 and 1976
- The Local Government and Housing Act 1989
- The Housing Act 2004

Offences involving fraud

Offences in which the victim has been deprived of money, property or other benefit by misrepresentation/deception on the part of the offender including:

- Theft
- Burglary
- Fraud
- Benefit fraud (particularly when tenants are in receipt of Housing Benefit/Universal Credit when it includes an element of housing benefit)
- Conspiracy to defraud
- Obtaining money or property by deception
- People trafficking
- Being struck off as the company director.

Offences involving violence

The conviction for the offence of:

- Murder
- Manslaughter
- Arson
- Malicious wounding or grievous bodily harm
- Grievous bodily harm with intent
- Actual bodily harm
- Robbery
- Racially aggravated criminal damage
- Common assault
- Common assault which is racially aggravated

- Assault occasioning actual bodily harm
- Possession of an offensive weapon
- Possession of a firearm

Offences involving drugs

Consideration should be given to the nature of the offence and what bearing it could have on the management of a private rented property. The nature, quantity and class of drug should be taken into account.

Offences involving sexual offences

- An offence contained in schedule 3 of the Sexual Offences Act 2003

Unlawful discrimination

- Unlawful discrimination can include findings of an Industrial Tribunal on unlawful employment and practice such as discrimination under the Disability Discrimination Act. Consideration should be given to the nature of the unlawful discrimination and what bearing it could have on the management of a licensable property.

Appendix C - Statement assets and other financial circumstances

You should complete this form and return it to Environmental Health and Licensing at Stevenage Borough Council. If you fail to provide the Council with your statement of assets and other financial circumstances, or the Council is not satisfied that it has been given enough reliable information, it is entitled to make such a decision as it thinks fit about your financial circumstances.

Please use BLOCK CAPITALS

For all your income and outgoings, please indicate if the figures are:

Weekly

Fortnightly

Monthly

I understand that if I knowingly make a statement which is false or knowingly fail to disclose any relevant fact, this will be taken into consideration when reviewing the level of the civil/financial penalty fine.

Signed

--

Date: ___/___/_____

1. Personal details:

First name(s)

--

Family name

--

Address where you live

--

Postcode

--

Home telephone number

--	--	--	--	--	--	--	--	--	--	--

Mobile telephone number

--	--	--	--	--	--	--	--	--	--	--

Email

--

Date of birth ___/___/_____

National Insurance number:

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2. Income details

If you are employed

Occupation

Employer's name

Employer's address

Postcode

Employer's telephone number

I am self-employed as

Your take home pay	£							
Any other income	£							
Total income	£							

If you are NOT employed

Please state since when

Are you in receipt of benefits Yes No

If Yes, please state below which benefit(s) you receive.

Income from property and land

List the full address and postcode and the rental income of all properties and land, (freehold or leasehold) both in UK and overseas, where you have an interest.

(Interest is registered owner/part owner, tenants in common, shareholder, company director of company owning property, manager, company director of company managing property, receipt of rental income from property, receipt of income paid as rent to a managing agent)

Address of property/land including postcode	Number of lets (if HMO each sleeping unit= 1 let) if single family dwelling whole house = 1 let	Total monthly rent for whole property	Estimated market value of property/land

3. Outgoings

You may ask the Council for extra time to pay. If you want to ask for more time, you will need to provide details and proof of your outgoings. The Council will consider your request but may not grant it.

Rent, mortgage or lodgings	£								
Council tax	£								
Insurance (home, life etc)	£								
Child maintenance	£								
Travel expenses (fuel car , public transport etc.)	£								
Utility bills (gas, water, electricity etc,)	£								
Telephone incl mobile	£								
Television subscription (licence, satellite etc.)	£								
Other fines (please specify court	£								
County court orders	£								
Loan repayments (credit card, bank etc.)	£								
Other outgoings (please specify)	£								
TOTAL OUTGOINGS	£								

4. Other information

Total savings(incl. shares, annuities, savings bonds etc)	£								
Partner's income including benefits	£								

Number of dependent children

Please add any other information (for example any assets not mentioned above) you believe the courts should know about.

Your legal obligations

This is an official request from Stevenage Borough Council. Every defendant who is issued with a notice of intention to serve a civil/financial penalty as an alternative to prosecution needs to provide financial information when asked.

In deciding the amount of any fine(s) the Council will take into account the information you have given about your financial circumstances including your assets. Any other outstanding fines that you have will be taken into account when imposing and enforcing a fine. The rest of the information on

the outgoing section is only relevant if you are unable to make full payment when the civil/financial penalty is served and ask the Council for additional time to pay. You may ask the Council for additional time to pay, which the Council will consider but not necessarily approve. If you do not pay the Council will apply to the Court to recover the fine and any expenses incurred.

External advice

If you need impartial, external advice on your rights, managing your debt or the possible consequences of not paying your fines, you can contact:

- National Debt Line: 0808 8084000 or www.nationaldebtline.co.uk
- Citizens Advice: www.citizensadvice.org.uk

Appendix D - Justification of decision

Statute:

Offence(s):

Date of offence (s)

Is it less than 6 months since SBC had evidence of the offence YES/NO

Culpability (mark as necessary)

Very High Culpability Deliberate	High Culpability Reckless	Medium Culpability Negligent	Low culpability
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Harm (mark as necessary)

High likelihood of harm Harm Category 1	Medium likelihood of Harm Harm Category 2	Low likelihood of harm Harm category 3
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Financial penalty

Starting point	Minimum	Maximum
£	£	£

Consideration of financial assessment

Reductions

Justification of level of penalty – (consider aggravating and mitigation factors Appendix A& B & total Principle, factors if moving outside of matrix etc)

Level of penalty: £

Total officer time £

TOTAL FINANCIAL PENALTY £

Additional adjustments

Name:

Signature:

Designation: Environmental Health Officer (Case officer)

Date:

Civil penalty recorded on Uniform YES/NO

Review of penalty

Does the penalty meet the general principles of the policy? YES/NO

Any additional comments:

Line manager (delete as appropriate)

- Agree with the level of the financial penalty and justification
- Disagree with the level of the financial penalty and justification.

Record of decision justification and reasoning to authorise/refuse authorisation:

Name:

Signature:

Designation: Residential and Animal Control Manager, Environmental Health and Licensing.

Date:

Senior Environmental Health and Licensing Manager

- Agree with the level of the financial penalty and justification
- Disagree with the level of the financial penalty and justification.

Additional comments:

Name:

Signature:

Designation: Senior Environmental Health and Licensing Manager

Date: