

**Cheltenham Borough Council**  
**Cabinet – 10<sup>th</sup> November 2015**  
**Proposal to Update and Adopt Animal Licencing Conditions**

<b>Accountable member</b>	<b>Cllr Andrew McKinlay, Cabinet Member for Development &amp; Safety</b>
<b>Accountable officer</b>	<b>Sarah Clark, Public and Environmental Health Team Leader</b>
<b>Ward(s) affected</b>	<b>All</b>
<b>Key Decision</b>	<b>Yes (affects communities living or working in two or more wards)</b>
<b>Executive summary</b>	<p>Under the Council’s constitution Cabinet can approve the adoption of animal licence conditions to raise animal welfare standards for licenced animal premises including pet vending, animal boarding establishments and dog breeding.</p> <p>An eight week consultation period on five new sets of standard licence conditions was under taken between 14<sup>th</sup> August and 9<sup>th</sup> October 2015.</p> <p>These new licence conditions are extracted from model conditions published by the Chartered Institute of Environmental Health (CIEH) and Local Authority Co-Ordinators of Regulatory Services (LACORS). Requests for alterations from consultees and the reporting officer have been highlighted with the recommendation for adoption.</p> <p>In particular, Cabinet are requested to choose their preferred option from the choices of wording in relation to the home boarding conditions.</p> <p>Adoption of the proposed conditions would bring the Authority up-to-date with the Animal Welfare Act 2006.</p>
<b>Recommendations</b>	<ol style="list-style-type: none"> <li><b>1. That the conditions set out in ‘Model conditions for <u>Pet Vending Licencing 2013</u>’ published by the Chartered Institute of Environmental Health, September 2013 (see Appendix 4 for original and Appendix 7 for proposed) are adopted as the Authority’s licensing conditions in respect of pet vendors and shops selling companion animals; including the yellow highlighted requests for amendment made following the council’s consultation process;</b></li> <li><b>2. That the conditions set out in ‘CIEH Model Licence Conditions and Guidance for <u>Dog Breeding Establishments</u>’ published by the Chartered Institute of Environmental Health, January 2014 (see Appendix 4 for original and Appendix 8 for proposed), are adopted as the Authority’s licensing conditions in respect of dog breeders who require a licence; including the yellow highlighted requests for amendment made following the council’s consultation process;</b></li> </ol>

3. That the conditions set out in ‘**CIEH Model Licence Conditions and Guidance for Cat Boarding Establishments 2013**’ published by the Chartered Institute of Environmental Health, November 2013 (see Appendix 4 for original and Appendix 9 for proposed) are adopted as the Authority’s licensing conditions in respect of cat boarding establishments; including the yellow highlighted requests for amendment made following the council’s consultation process;
4. That the conditions set out in ‘**CIEH Model Licence Conditions and Guidance for Dog Boarding Establishments**’ published by the Chartered Institute of Environmental Health, October 1995 (see Appendix 4 for original and Appendix 10 for proposed) are adopted as the Authority’s licensing conditions in respect of dog boarding establishment using external kennels; including the yellow highlighted requests for amendment made following the council’s consultation process;
5. That the conditions set out in ‘**LACORS Model Licence Conditions for Home Boarding (Dogs), Animal Boarding Establishments Act 1963**’ published by LACORS in November 2005 along with the ‘**LACORS model home boarding conditions - Update and clarification, 14<sup>th</sup> October 2009**’ (see Appendix 5 for original and Appendix 11 for proposed) are adopted as the Authority’s licensing conditions in respect of the home boarding of dogs; including the yellow highlighted requests for amendment made following the council’s consultation process. In particular, the view of Cabinet is requested regarding the blue highlighted proposed conditions;
6. That the conditions are applied from the 1<sup>st</sup> January 2016.
7. That Cabinet approve that officers may deviate from the detail of these conditions on a case by case basis, provided the proprietor can prove that the same or higher animal welfare standards are achieved by an alternative approach.

<b>Financial implications</b>	None arising directly from this report.  <b>Contact officer: Nina Philippidis, Business Partner Accountant nina.philippidis@cheltenham.gov.uk, 01242 264121</b>
<b>Legal implications</b>	As specified in the report under “Legislation”  <b>Contact officer: vikki.fennell@tewkesbury.gov.uk, 01684 272015</b>
<b>HR implications (including learning and organisational development)</b>	There are no direct HR implications as a result of this report  <b>Contact officer: Richard Hall – HR business partner , richard.hall@cheltenham.gov.uk, 01242 77 4972</b>

<b>Key risks</b>	The key risks relate to effective enforcement capability, the promotion and raising of animal welfare standards, and business and customer concerns about licensed trade. Please see the accompanying risk assessment for full details.
<b>Corporate and community plan Implications</b>	<p>The recommendations will help to sustain and grow Cheltenham's economic and cultural vitality by:</p> <ul style="list-style-type: none"> <li>- Ensuring a level playing field for licensed animal businesses by updating conditions to a nationally recognised standard, whilst recognising the contributions of local businesses and interest groups</li> <li>- Promoting animal welfare within the borough.</li> </ul> <p>In addition, these recommendations will help people to live in strong, safe and healthy communities by:</p> <ul style="list-style-type: none"> <li>- Reducing the risk of animal to human infectious diseases (zoonosis) and animal to animal infection</li> <li>- Improving animal welfare standards meaning people in the borough have healthier pets which in turn improves human health and wellbeing.</li> </ul>
<b>Environmental and climate change implications</b>	There are no specific environmental or climate change implications.
<b>Property/Asset Implications</b>	<p>None</p> <p><b>Contact officer: David Roberts – Head of Property</b>  <b>david.roberts@cheltenham.gov.uk, 01242 264151</b></p>

## **1. Background**

- 1.1** Licencing conditions are currently in place for Pet Shops and for Animal Boarding Establishments please see the current conditions in Appendix 2. The conditions are old and were designed in-house which means they are no longer fit for purpose under the Animal Welfare Act 2006.
- 1.2** There are no conditions in place for dog breeding licences, nor are there currently any licenced businesses.
- 1.3** The Authority has currently four licenced pet shops and nine boarding establishments (six of which are home boarders).
- 1.4** Licenced animal establishments are currently inspected yearly or on a risk based programme. If problems are found at an inspection, revisits are undertaken when necessary and any appropriate action will be taken in-line with the corporate enforcement policy. Establishments demonstrating a level of high compliance and with low risk (e.g. low numbers) may be inspected every other year (this has occurred with home boarding establishments licenced for care with one or two animals).
- 1.5** Prior to this Cabinet paper, an eight week consultation exercise was undertaken which included consulting with the Licensing Committee. The Committee received a presentation as part of the process (Appendix 15) and agreed that they supported the adoption, in principle, of the model conditions by Cabinet (see Appendix 12). Further details about the consultation process are available in Section 4 of this report).

### Legislation

- 1.6** Under the Pet Animals Act 1951 (section 1(1)) any business which sells companion animals, must hold a pet shop licence issued by the local authority.
- 1.7** Section 1(3) of the Pet Animals Act 1951 enables local authorities to make conditions to secure appropriate animal accommodation, nutrition, age of sale, prevention of infection and that appropriate steps are taken in relation to fire. Please see Appendix 3 for specific legislation details.
- 1.8** Under the Breeding of Dogs 1973 (section 1(1)) & the Breeding and Sale of Dogs (Welfare) Act 1999 (section 7), any premise where the business of breeding dogs for sale is carried out, requires a licence by the local authority. Please see Appendix 3 for specific legislation.
- 1.9** Under section 1(4) of the 1973 Act a local authority may specify conditions under the dog breeders licence, in order to secure suitable; accommodation (including construction, size, number of occupants, exercising facilities, temperature, lighting, ventilation and cleanliness); animal nutrition; prevention of infection; appropriate steps in relation to emergency situations; care in transport; ensure b\*\*ches are not mated if they are less than one year old; ensure b\*\*ches do not give birth to more than six litters of puppies each; ensure that b\*\*ches do not have more than one litter of puppies in any twelve month period; and that accurate records are maintained. Please see Appendix 3 for the specific legislation.

- 1.10** Under the Animal Boarding Establishments Act 1963 no person shall keep a boarding establishment for animals ('animals' being defined as any cat or dog under the Act) except under the authority of a licence, granted by the local authority.
- 1.11** Section 1(3) of the Animal Boarding Establishments Act 1963 enables local authorities to make conditions to secure appropriate animal accommodation (including construction, size, number of occupants, exercising facilities, temperature, lighting, ventilation and cleanliness); animal nutrition, human visits, prevention of infection, appropriate steps in relation to emergency situations; and register details. Please see Appendix 3 for the specific legislation details.
- 1.12** Under section 9 of the Animal Welfare Act 2006 there is a duty on all persons deemed responsible for an animal (including a licensee) to ensure that an animals needs are met. This include the need for; a suitable environment, suitable diet, to be able to exhibit normal behaviour patterns, to be housed with, or apart from, other animals; and to be protected from pain, suffering, injury and disease. Please see Appendix 3 for the specific legislation details.

#### Model Licence Conditions

- 1.13** Appendix 4 provides web-links to the model licence conditions published by the Chartered Institute of Environmental Health (CIEH) upon which the proposed conditions are based. They were produced with guidance from the bodies listed in the Appendix which includes; veterinary professional bodies, trade representation, charities and other professional bodies including other local authorities.
- 1.14** The model conditions have been extracted from the relevant guidance documents in Appendix 4 and are the bold numbered conditions in the proposed conditions appendices 7-11.
- 1.15** The model licence conditions for dog boarding in kennels, published in 1995, is overdue for an update. New conditions are expected in the near future however at the time of writing this report they have not yet been published.
- 1.16** Appendix 5 are the model licence conditions for home boarding published by LACORS (Local Authorities Co-ordinators of Regulatory Services) in 2005 and the update made in 2009, these are not easily found on the internet. The home boarding model conditions were based on the CIEH model conditions for dog boarding published in 1995. Since 2010 'LACORS' no longer exists and has become merged into the Local Government Association. No further guidance has been published and the reporting officer is not aware of any planned conditions for home boarding to be issued.

## **2. Reasons for recommendations**

Relates to all proposed conditions except home boarding (see 2.15)

- 2.1** The model conditions published by the CIEH are the most up-to-date sets of conditions available for adoption at this time.
- 2.2** Adoption of the model licence conditions will bring the Authority in-line with other local authorities who have adopted the conditions.
- 2.3** There are currently no conditions for the breeding of dogs in this local authority area. There are currently no licenced dog breeders in the borough. Should any dog breeder wish to apply for a licence application, the process will be quicker if licence conditions are in place.
- 2.4** The current conditions for Pet Vending and Animal Boarding (see Appendix 2) are open to interpretation. This means businesses may operate differently under the same licence conditions, which does not allow for an equal competitive footing. The proposed conditions provide businesses with some specific minimum standards, clearer conditions and good direction to areas of licensable concern.
- 2.5** Where conditions are open to interpretation enforcement can be difficult to apply. The proposed conditions are considered clearer by enforcement officers and although not particularly prescriptive, they are more descriptive than the current ones. This ensures conditions are easier to enforce.
- 2.6** The model conditions expand on the current conditions in terms of animal welfare, public health, knowledge of numbers permitted and provide clearer management and training guidelines.
- 2.7** The wording in condition 23 of the Authority's current pet vending licence conditions (Appendix 2) is in breach of section 11 of the Animal Welfare Act 2006 in that it allows the sale of animals to persons under the age of 16. The Animal Welfare Act 2006 prohibits the transfer of animals by way of sale or prize to persons under 16 years of age (see Appendix 3). The reporting officer is aware that the borough's current licenced establishments have systems in place to comply with this Animal Welfare Act requirement and do not undertake sales to anyone under the age of 16.
- 2.8** The model conditions expand on what is needed in a licenced animal establishment's animal register (for current conditions see Appendix 2; pet vending condition 19 and boarding establishments' condition 8). This makes it easier for licensees to understand the requirements of a register and ensures clearer enforcement. (For proposed conditions see Appendix 7-11; pet vending condition A.4; dog breeding condition 6.5; cat boarding condition E.2; dog boarding – kennels condition 5.8; dog boarding- home boarders condition 5.7)

**2.9** Some model conditions ensure specific numbers of animals or enclosure units are stipulated on the licence (see Appendix 7 & 10: Pet vending condition, A.5.1 ; and Kennels, 4.1.1.). Expanding on this, some of the conditions requested by the lead officer ensure specific numbers of animals or units are stipulated for other licence types: Dog Breeding, requested condition 1.15.1; Catteries, requested condition A.2.1.2; and Home boarders requested condition 3.1 (see Appendix 8, 9 and 11). This will make the licenced capacities clearer and helps ensure the public understand the size of the business.

**2.10 Table of number of requests within the proposed standard conditions:**

<b>Pet vending</b> Appendix 7	3 requests	By IFAW PDSA
<b>Dog Breeding</b> Appendix 8	8 requests	By IFAW Officer PDSA
<b>Cat Boarding – Catteries</b> Appendix 9	4 requests	By Officer PDSA and Pegasus Cattery Licenced boarder
<b>Dog Boarding – Kennels</b> Appendix 10	5 requests	By Licencing Committee Officer PDSA PIF
<b>Dog Boarding - Home</b> Appendix 11	20 requests	By Bark & Call Officer PDSA PetStay PIF

**2.11** LACORS did not consult other professional bodies when setting the home boarding conditions. The 20 requests for changes may perhaps reflect the lack of consultation with the industry by LACORS before the guidance was published.

**2.12** The reporting officer believes along with the consultees that the requests highlighted in yellow within the proposed conditions offer an increase in animal welfare standards or clearer understanding of the conditions.

**2.13** There were 40 requests for changes to the model conditions. Should Cabinet Members have any questions regarding specific requests for changes, they are encouraged to ask the report writer the reasoning behind the request.

**2.14** Adoption of the yellow highlighted conditions will demonstrate the Authority’s response to listening to the various consultees who have taken their time and interest to respond to the consultation. For further information on the consultation please see section 4, consultation and feedback below.

#### Recommendation 5 (home boarding)

- 2.15 Dog boarding conditions for kennels cannot be applied to home boarders. Home boarding is where a strangers' dog lives in the home boarders house as their pet. Home boarders do not have and are not expected to have, separate external kennels. The CIEH model conditions for dog boarding establishments deals with kennels and therefore the majority of the conditions do not apply to home dog boarding. Separate home boarding conditions are therefore required.
- 2.16 The LACORS Home boarding model conditions are currently the most up-to-date conditions for home boarding.
- 2.17 Adoption of the conditions based on the LACORS home boarding model licence conditions will bring the Authority in-line with other local authorities who have adopted the conditions.

#### Cabinet Consideration of blue highlighted Home Boarding Conditions

- 2.18 Cabinet are requested to consider the blue highlighted areas within the proposed conditions for home boarding establishments (Appendix 11) and make a decision on the most appropriate condition. The conditions for consideration are 5.5.7 and 5.8.3.

#### Consultation feedback regarding the use of prescription medication proposed home boarding condition 5.5.7

- 2.19 5.5.7 reads "Precautions must be taken to prevent the spread of fleas, ticks, intestinal parasites and other parasites in both boarded and resident dogs. Proof must be maintained of all routine and emergency treatment for parasites."
- 2.20 PDSA are a veterinary based charity and requested the following be inserted to 5.5.7 "*.... Medicines to prevent these parasites should be prescription medications and only administered after consultation with a veterinary surgeon....*". PDSA requests this to ensure that business owners do not self-medicate.
- 2.21 Bark and Call our largest home boarder who have lived and worked around dogs all their lives, **do not** support this addition and have stated that the requirement to have prescription only medication would be cost prohibitive because it would require the home boarder to go to the vet for treatment of all parasites.
- 2.22 The majority of pet owners will self-medicate their dogs to treat parasites they are knowledgeable of but will go to a veterinary surgeon when they do not know what the problem is.
- 2.23 Cabinet is therefore requested to decide on what they consider to be the most appropriate condition.



Consultation feedback regarding a child in a home boarders home and level of supervision, proposed home boarding condition 5.8.3

- 2.24** Dogs can be unpredictable, for many reasons.
- 2.25** Children are not always aware of the many risks associated with dogs. Children are risk immature.
- 2.26** A home boarder taking a stranger's dog into a child's home is subject to greater risk concerns than a family who have small children and a resident dog. The stranger's dog has unknown reactions.
- 2.27** The Animal Welfare Act ensures no animal is sold to a person under 16 years of age.
- 2.28** The reporting officer is not aware of any guidance about at what age a child/dog interaction becomes safe. i.e. when a child becomes less inquisitive towards a dog and knows how not to annoy it; nor when a child can read the warning signs a dog may give and make the situation safe. It is likely to depend upon the maturity and temperament of both the child and dog.
- 2.29** The PetStay franchise holder for Gloucestershire, express their view in Appendix 14 ie that the age is raised from 5 to 7 years old.
- 2.30** No current licenced home boarders have children under 7 in their household.
- 2.31** PDSA have inserted a requirement to ensure "no people under the age of 16 years of age should be left unsupervised with boarded dogs at any time". The reporting officer considers this to be an onerous condition because it is not easy to enforce, especially if the boarding dog is to live in the home as the boarders own pet. Such a condition would prevent a teenager watching TV with the visiting dog in the same room.
- 2.32** Please note that the combined PetStay and PDSA request is supported by the Cheltenham Animal Shelter.
- 2.33** Cabinet is therefore requested to decide on what they consider to be the most appropriate condition.

Recommendation 6

- 2.34** Adoption of the conditions for the 1<sup>st</sup> January 2016 allows the conditions to be implemented with the annual pet vending and animal boarding renewals which, in line with the legislation, run from 1<sup>st</sup> January to 31<sup>st</sup> December each year.

Recommendation 7

- 2.35** Although the proposed conditions represent best practice, are very comprehensive and are specifically designed to ensure a fair and consistent approach to licensing, they do not cover all eventualities. Officers should be permitted to exercise some discretion (i.e. to achieve the same aim through a different approach) provided it is shown that the appropriate animal welfare standards will still be achieved.

### **3. Alternative options considered**

- 3.1 Cabinet may choose to operate the animal licensing service with no conditions attached to licences.
- 3.2 Cabinet may choose to enter the model conditions unaltered by consultee opinion/comment.
- 3.3 Cabinet may choose to implement their own conditions.
- 3.4 Please see the accompanying risk assessment for the potential consequences of choosing one of these alternative options.

### **4. Consultation and feedback**

- 4.1 An eight week consultation period was undertaken between 14th August and 9th October 2015.
- 4.2 Proposed licence conditions documents were available on the council website and were updated with the “requests” made throughout the consultation period. Requests for changes were discussed with the consultees on all occasions and updated to the proposed conditions when agreed upon. The only two conflicting responses received were those detailed in paras 2.19 – 2.33 above.
- 4.3 Updates were circulated to the licenced establishments or consultees who would be / or had shown, interest in the conditions affected. Please note that the PIF and IFAW consultation requests were not circulated to the licenced establishments as these come into the Authority on 9<sup>th</sup> October 2015.
- 4.4 Should Cabinet Members have any questions relating to specific requests for changes they are encouraged to ask the report writer the reasoning behind the request.
- 4.5 There were forty requests for changes made by seven contributors from the consultation alongside requests made from the reporting officer. In addition a further four responders offered their support to the proposed conditions and did not request changes.

#### Summary of Consultation Responses

- 4.6 Appendix 6 summarises who was directly contacted including licensed establishments, local vets and animal welfare charities.
- 4.7 Appendix 12 provides a summary of consultation responses. There were eleven responders who are listed in alphabetical order. Further detail of significant contributors, are alphabetically listed, in Appendix 12.
- 4.8 Significant contributors include: Bark and Call; Defra, IFAW, the Licencing Committee, PDSA, Pets at Home and Naturewatch Foundation (who also submitted a statement see Appendix 13)

## 5. Performance management –monitoring and review

- 5.1 The animal licensing officers work to statutory and council performance requirements in terms of timescales, standards and enforcement approach.
- 5.2 Operational issues are raised with the team leader as they arise, and performance monitoring is undertaken through monthly 121s.
- 5.3 The health and safety service which delivers animal licensing is subject to radical transformation through systems thinking which is likely to result in specific performance measures – for example around end to end application times.
- 5.4 In addition, the officers are members of a county animal welfare group which aims to promote best practice and consistency.
- 5.5 Further review of these conditions is anticipated when further model conditions and/or guidance is published – for example, dog boarding kennels – or if there are further legislative changes.

<p><b>Report author</b></p>	<p><b>Contact officer: Sadie Hawson, Senior Environmental Health Officer (Lead Animal Licensing Officer)</b>  <a href="mailto:sadie.hawson@cheltenham.gov.uk">sadie.hawson@cheltenham.gov.uk</a> Tel: 01242 775028</p> <p><b>Team Leader: Sarah Clark, Public &amp; Environmental Health Team Leader.</b> <a href="mailto:sarah.clark@cheltenham.gov.uk">sarah.clark@cheltenham.gov.uk</a> Tel: 01242 264226</p>
<p><b>Appendices</b></p>	<ol style="list-style-type: none"> <li>1. Risk Assessment</li> <li>2. Current CBC Animal Licence Conditions</li> <li>3. Extracted Legislation for Animal Licencing Conditions</li> <li>4. Model Licence Conditions and Contributors</li> <li>5. LACORS Model licence Conditions – Home Boarding</li> <li>6. List of Consultees</li> <li>7. Draft Proposed CBC Pet Vending Conditions</li> <li>8. Draft Proposed CBC Dog Breeding Conditions</li> <li>9. Draft Proposed CBC Cat Boarding Conditions</li> <li>10. Draft Proposed CBC Dog Boarding Conditions – Kennels</li> <li>11. Draft Proposed CBC Dog Boarding Conditions – Home Boarding</li> <li>12. Summary of Consultation Responses</li> <li>13. Naturewatch Foundation (Charity) Consultation Response</li> <li>14. PetStay’s Supporting Statement for Home Boarding Condition 5.8.3</li> <li>15. Animal Licencing Consultation Presentation</li> </ol>

<b>Background information</b>	<ol style="list-style-type: none"><li>1. Links to the model conditions are found in Appendix 4.</li><li>2. LACORS model conditions for Dog Boarding are found in Appendix 5.</li><li>3. <a href="#">Pet Animals Act 1951</a></li><li>4. <a href="#">Pet Animals (Amendment) Act 1983</a></li><li>5. <a href="#">Breeding of Dogs Act 1973</a></li><li>6. <a href="#">Breeding of Dogs Act 1991</a></li><li>7. <a href="#">Breeding and Sale of Dogs (Welfare) Act 1999</a></li><li>8. <a href="#">Breeding of Dogs (Licensing Records) Regulations 1999</a></li><li>9. <a href="#">Animal Boarding Establishments Act 1963</a></li><li>10. <a href="#">Animal Welfare Act 2006</a></li><li>11. <a href="#">Code of practice for the welfare of dogs</a></li><li>12. <a href="#">Code of practice for the welfare of cats</a></li></ol>
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## Risk Assessment

## Appendix 1

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
	If the council does not adopt <b>any</b> licence conditions in respect of animal licensing, then it will not have effective enforcement powers to deal with animal welfare or licensing issues which could result in customer complaints, reputational damage or criticism from local businesses who may believe they do not have an equal trading environment to their competitors.	SC	16.10.15	2	3	6	A	Reference would be made to Cabinet's decision not to adopt the conditions, and anyone wishing to complain would have recourse to the council's complaints procedure.	-	SC	Divisional
	If the council does not adopt <b>any</b> licence conditions, then it will be unable to adequately improve and maintain animal welfare standards, which could lead to animal ill health, animal rights challenges and reputational damage, customer complaints about licence holders, licensee complaints about other businesses or claims the council does not assist them to achieve high standards.	SC	16.10.15	2	3	6	A	As above - reference would be made to Cabinet's decision not to adopt the conditions, and anyone wishing to complain would have recourse to the council's complaints procedure. In terms of adverse publicity, the council usually has a right to reply in written media although this can be harder to manage over social media	-	SC	Divisional

	If the council does not adopt the <b>proposed</b> conditions, then it will not have comprehensive intelligence to use in event of an infectious disease or zoonosis incident, which would result in individual or widespread illness as well as loss of animal stock to local businesses.	SC	16.10.15	3	2	6	A	Public Health England could be notified in advance that the council does not hold information of this kind, although this in itself would not reduce or mitigate the risk to individual and public health.	-	SC	Divisional
	If the council does not adopt the <b>proposed</b> licence conditions in respect of animal licensing, then it will in effect support breaches of the Animal Welfare Act 2006 with regard to the legal age for the sale/transfer of animals, which could cause reputational damage and lead to challenge from the industry. DEFRA have asked to be informed of the council's approach to animal welfare and licensing in this eventuality	SC	20.10.15	1	3	3	A	The council would be unable to enforce conflicting conditions but no specific action required in order to accept the risk	-	SC	Divisional
	If the council does not adopt the <b>proposed</b> licence conditions but chooses instead to use the model conditions, or draft ones of its own, then there could be a challenge from consultees and special interest groups about the validity and appropriateness of such	SC	20.10.15	2	3	6	A	None possible other than to refer to the Cabinet decision in that eventuality	-	SC	Divisional

	conditions. These could take the form of complaints, press attention, petitions or lobbying, for example.										
<p><b>Explanatory notes</b></p> <p><b>Impact</b> – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)</p> <p><b>Likelihood</b> – how likely is it that the risk will occur on a scale of 1-6 (1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)</p> <p><b>Control</b> - Either: Reduce / Accept / Transfer to 3rd party / Close</p>											